

Euston Tower, Camden

Independent Review of ES Addendum (Trium, December 2024)

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author **Patrick Little**

date **26/02/2025**

approved **Mark Crowther**

signature 

date **26/02/2025**

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1 Introduction

1.1 Background

Buro Happold has been commissioned by the London Borough of Camden ('LB Camden') to provide independent Environmental Impact Assessment (EIA) advice, in relation to the proposed redevelopment of Euston Tower, located at 286 Euston Road, London, NW1 3DP (the 'application site'), in the London Borough of Camden.

British Land Property Management Limited (herein 'the Applicant') submitted a planning application in December 2023 to LB Camden. This was for the redevelopment of the site, including the partial retention, disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace and office, retail, café and restaurant space and learning and community space at ground, first and second floors, as well as other associated improvement works.

An Environmental Statement (ES) (Trium, December 2023) was submitted alongside the planning application. On behalf of LB Camden, CBRE undertook an independent review of the ES, as well as subsequent information submitted by Trium on behalf of the Applicant. CBRE's most recent review of the ES was issued in September 2024.

Subsequently, the Applicant held consultations with LB Camden, as well as local residents and other stakeholders, and in response to comments provided by LB Camden, a number of design changes have now been made to the scheme, primarily focused on the façade design and building massing. On behalf of the Applicant, Trium has submitted an ES Addendum, comprising three volumes and a technical summary (Trium, December 2024), which updates the EIA assessments to account for the proposed amendments.

Buro Happold has been appointed by LB Camden to undertake an independent peer review of the ES Addendum. The purpose of this document is to report the outcome of this review to help inform LB Camden's determination of the planning application.

1.2 The proposed development

The December 2023 planning application sought planning permission for:

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

As set out in Chapter 1 of the main volume of the ES Addendum, the proposed amendments comprise:

- Changes to the Tower:
 - Tower massing has been adjusted to create a simpler, rectangular form; the tower is rounded at the corners and breathing spines are pushed inwards to separate the tower into four quadrants;
 - Façade design has incorporated an upstand into the horizontal elements that wrap the rounded massing corners. Vertical elements now span the tower top to bottom through which natural ventilation can occur;
 - Minor adjustment to vertical transportation strategy via level change from lift banks;

- Four double height amenities have been relocated relative to their previous quadrants/levels;
- Column grid adjusted to 9m bays and offset from façade by 2m;
- The crown of the building has a double height amenity façade treatment such that the building is perceived the same from all angles;
- There is no change to the building height;
- Changes to the amount of publicly accessible space, adjusted at ground and first floor levels;
- Changes to the Podium;
 - Number of podium levels has increased from four to six (L00-L05);
 - Podium Massing has been adjusted with rounded corners, increasing ground floor open space along Hampstead Road;
 - Layout of public space in Enterprise Space has been adjusted and its entrance along Hampstead Road adjusted from triple height to double height;
 - The escalator and stair layout of lobby space has been adjusted to be more space efficient;
- Minor updates have been made to the design and location of planters and trees in the public realm; and
- End of trip facilities entrance and access has been adjusted from a ramp to a bicycle stair and lift. External access remains from the southwest corner of the ground floor.

Hereafter, these are referred to as the 'proposed development amendments', forming the 'amended proposed development'.

1.3 The proposals in the context of EIA

The proposed development is not a Schedule 1 development, for which Environmental Impact Assessment (EIA) would be mandatory. It is however of a type listed within the descriptions of development contained within Schedule 2 of The Town and County Planning (Environmental Impact) Regulations 2017 (as amended in 2018) (the 'EIA Regulations 2017'), falling under category 10(b) urban development projects (including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas). Under the regulations, EIA is required for Schedule 2 development where the development is "likely to have significant effects on the environment by virtue of factors such as its nature, size or location".

The proposed development does not lie within a sensitive area, as defined in the EIA Regulations; and it falls below the Schedule 2 thresholds/criteria. However, given the scale of the proposals and the presence of sensitive receptors in the surrounding area, the Applicant has recognised there is the potential for significant environmental effects to arise. The Applicant has therefore elected to undertake an EIA without the submission of a request for a screening opinion.

2 Review Methodology

2.1 Review Overview

Buro Happold's review of the ES Addendum has been undertaken by an experienced EIA co-ordinator / environmental generalist, taking into account technical review comments from a variety of statutory consultees.

The review has included consideration of:

- Whether the ES Addendum adequately addresses the amendments to the proposed development, and also the lapse in time, since the original ES was prepared – in the context of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [1] (as amended in 2018 [2]) - herein referred to as the 'EIA Regulations 2017';
- Whether all of the information requested within the scoping opinion (and through subsequent consultation) has been provided by the Applicant;
- Whether the technical assessments reported in the ES Addendum are based on consistent scheme information; and
- Whether the mitigation measures proposed in the ES Addendum are considered sufficient and whether the proposed mechanisms for securing the mitigation measures are acceptable.

Relevant statutory consultee comments have been summarised in the main body of the report. The consultee comments are provided in full in Appendix A.

2.2 Buro Happold Expertise

Under Regulation 4(5), of the EIA Regulations 2017:

"The relevant planning authority or the Secretary of State must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement."

Buro Happold's review has been led by Patrick Little, a Technical Director with over 14 years of EIA and environmental planning consultancy experience. Patrick leads the company's EIA and environmental planning services in London & the South East and has led the provision of independent EIA peer review services on multiple projects in Camden on behalf of LB Camden. Patrick's CV is provided in Appendix B.

2.3 The ES Addendum and prior EIA documents

The ES Addendum comprises the following documents, which have been reviewed by Buro Happold:

- Replacement Non-Technical Summary;
- Volume 1: ES Main Report:
 - Chapter 1: Introduction, Proposed Design Amendments and ES Addendum Approach
 - Chapter 6: Socio-Economics;
 - Chapter 7: Traffic and Transport;
 - Chapter 8: Air Quality;
 - Chapter 9: Noise and Vibration;
 - Chapter 10: Daylight, Sunlight, Overshadowing, and Solar Glare;

- Chapter 11: Wind Microclimate;
 - Chapter 12: Climate Change and Greenhouse Gases;
 - Chapter 13: Summary & Conclusions;
- Volume 2: Townscape, Visual & Built Heritage Assessment; and
- Volume 3: ES Addendum Technical Appendices:
 - Appendix: Introduction, Proposed Design Amendments and ES Addendum Approach;
 - Appendix: Daylight, Sunlight, Overshadowing and Solar Glare;
 - Appendix: Wind Microclimate; and
 - Appendix: Climate Change and Greenhouse Gases.

Given Buro Happold’s lack of prior involvement in the project, to inform the peer review the following prior EIA documents have also been reviewed where necessary for information purposes:

- EIA Scoping Report & EIA Scoping Opinion;
- ES Volume 1: Main Report;
- ES Volume 2: Townscapes, Visual and Built Heritage Assessment;
- ES Volume 3: Technical Appendices;
- ES Review Report (CBRE, September 2024); and
- Summary of Responses to ES Clarifications and Potential Regulation 25 Items (Trium, letter dated November 2024).

2.4 The IEMA Criteria

This independent ES Addendum review has been undertaken using the criteria-based approach developed by the Institute of Environmental Management and Assessment (IEMA) (hereafter ‘the IEMA criteria’). IEMA is the world’s largest professional body for EIA specialists. The IEMA criteria address:

- EIA regulatory compliance [3];
- EIA context and influence (addressing scoping, alternatives, including iterative design, and consultation) [4];
- EIA presentation (addressing ES quality and the Non-Technical Summary (NTS)) [5]; and
- EIA content (addressing baseline conditions, assessment of impacts and environmental mitigation and management) [6].

The EIA Quality Mark grading system [7], which comprises a traffic lights system, has been used to grade the review findings.

2.4.1 EIA regulatory Compliance

The IEMA EIA regulatory compliance criteria are set out in Table 2-1.

Table 2-1 IEMA EIA regulatory compliance criteria

| Criteria | |
|----------|--|
| A | Does the ES contain a clear section, or sections, providing a description of the development comprising information on the site, design and size of the development during construction and operation? |
| B | Does the ES contain a section, or sections, that outline the main alternatives studied by the developer and an indication of the main reasons for their choice, taking into account the environmental effects? |
| C | Does the ES contain a clear section, or sections, that provides the data required to identify and assess the main effects which the development is likely to have on the environment? |

| Criteria | |
|----------|---|
| D | In the light of the development being assessed has the ES identified, described and assessed effects on: <ul style="list-style-type: none"> • Population • Fauna & Flora • Soil • Water • Air • Climatic factors • Landscape • Cultural Heritage • Material Assets • Other* |
| E | Does the ES attempt to set out the interaction between the factors set out in COM3 D) above? |
| F | Does the ES contain a section, or sections, that describe the likely significant effects of the proposed development on the environment, including as reasonably required: direct, indirect, secondary, cumulative, short, medium, long-term, permanent and temporary, positive and negative effects? |
| G | Does the ES contain a clear section, or sections, that provides a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects? |
| H | Has a Non-Technical Summary been produced containing an outline of the information mentioned in COM3 A) to G)? |
| I | Does the ES contain a section, or sections, that outline any difficulties encountered by the developer in compiling the information presented in the ES? |

* This is considered to include the additional technical topics required under the EIA Regulations 2017

To ensure the review is suitably robust, Buro Happold has also used additional EIA regulatory compliance criteria in line with Regulation 18 and Schedule 4 of the EIA Regulations 2017, as shown in Table 2-2 below.

Table 2-2 Additional EIA regulatory compliance criteria in line with Regulation 18 and Schedule 4 of the EIA Regulations 2017

| Criteria |
|--|
| An ES must, where a scoping opinion or direction has been issued in accordance with regulation 15 or 16, be based on the most recent scoping opinion or direction issued (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion or direction). Has the ES been based on the based on the most recent scoping opinion? |
| An environmental statement must include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment. Has this been provided? |
| An environmental statement must be prepared, taking into account the results of any relevant UK environmental assessment, which are reasonably available to the person preparing the environmental statement, with a view to avoiding duplication of assessment. Has this been undertaken? |
| In order to ensure the completeness and quality of the environmental statement the developer must ensure that the environmental statement is prepared by competent experts; and the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts. Has this been undertaken? |
| Does the ES include a reference list detailing the sources used for the descriptions and assessments included in the ES? |

2.4.2 EIA context and influence

The IEMA EIA context and influence criteria are set out in Table 2-3

Table 2-3 IEMA EIA context and influence criteria

| Criteria |
|---|
| Scoping |
| Has the ES clearly stated what environmental topics will be addressed and how this decision was reached? |
| Are the main sensitive receptors and their locations clearly identified with an explanation of the risks posed from the development? |
| Does the ES identify the environmental topics, raised during the scoping process, that will not be assessed and explain why they are not being considered further? |
| For those environmental topics scoped into the EIA, is it clear that the assessment has focussed on sub-issues relevant to the proposed development effects on each topic? |
| Alternatives, including iterative design |
| Does the ES set out the main alternatives / iterations that were considered at different points during the development of the proposal? |
| Are the main reasons, environmental or otherwise, for the selection of the proposal over distinct alternatives and design iterations easily identifiable? |
| Does the ES clearly indicate how the EIA process, environmental effects and consultee responses influenced the iterative design process that led to the proposed development? |
| Consultation |
| Does the description of any consultation include an indication of those contacted, including statutory and non-statutory consultees, and the public? |
| Does the main text of the ES provide a summary of the main issues, pertinent to the EIA, raised by consultees? |
| Does the ES set out if any of the issues pertinent to the EIA raised by consultees will not be dealt with in the ES? If so is clear justification set out as to why the issue was scoped out? |

2.4.3 EIA presentation

The IEMA EIA presentation criteria are set out in Table 2-4.

Table 2-4 IEMA EIA presentation criteria

| Criteria |
|---|
| ES quality |
| Does the ES make effective use of maps, figures, tables and diagrams? In particular covering: - the location of the site, its boundary and site layout; - operational appearance (where available); - main environmental receptors; and - environmental effects (where visual representation is appropriate). |
| Is the proposed development site clearly described? |
| Are the anticipated timescales of construction, operation and (where appropriate) decommissioning of the proposed development clearly set out in the main text? |
| Is the ES presented in a manner that would allow a member of the public to logically locate the environmental information they were seeking? |
| Are technical terms kept to a minimum, with a glossary (/ list of acronyms) provided? |
| Is the length of the main text of the ES appropriate to the: proposed development, sensitivity of the receiving environment and significant environmental effects identified? |

| Criteria |
|---|
| Non-Technical Summary (NTS) |
| Does the NTS provide sufficient information for a member of the public to understand the significant environmental effects of the proposed development without having to refer to main text of the ES? |
| Are maps and diagrams included in the NTS that, at a minimum, illustrate the location of the application site, the boundary of the proposed development, and the location of key environmental receptors? |
| Is it clear that the NTS was made available as a separate stand-alone document? |

2.4.4 EIA content

The IEMA EIA content criteria are set out in Table 2-5.

Table 2-5 IEMA EIA content criteria

| Criteria |
|--|
| Baseline |
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? |
| Is the 'sensitivity' of the baseline environment clearly evaluated? |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? |
| Assessment |
| Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined? |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? |
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? |
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? |
| Environmental mitigation & management |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? |
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? |

2.4.5 EIA Quality Mark grading system

The IEMA EIA Quality Mark grading system criteria are set out in Table 2-6.

Table 2-6 IEMA EIA Quality Mark grading system criteria

| Criteria | Interpretation |
|-----------------|---|
| Pass | The review provided effective evidence of compliance with the requirements of the EIA commitment/review criterion. Limited issues, inadequacies, or omissions may be identified but they do not amount to 'Concerns'. |
| Concerns | The review could not find sufficient evidence to award full compliance with the EIA commitment/relevant criterion. Whilst the review found evidence of an attempt to meet the specific requirements, the inadequacies, omissions, or issues identified meant a 'Pass' grade could not be given. Submission of additional information (a clarification) is required from the applicant to clarify the inadequacy/omission/issue, such that a pass/fail judgement can then be made by the reviewer. |
| Fail | The review found significant omissions or inadequacies in relation to an EIA commitment/relevant criterion and there was an insufficient explanation to justify the failing identified. Submission of additional information in accordance with a Regulation 25 request is required from the applicant. |

2.5 Scoring

For each technical chapter review, a critique of the assessment has been provided. Any inadequacies, omissions or issues identified by Buro Happold or by the consultees in their consultation responses have been clearly identified.

Where a review of the core scope of the assessment identifies issues that would result in a 'fail' grade, this may inherently lead to subsequent sections of the review being graded as 'concerns' deriving from the initial core assessment scope failure. In such an instance, rectifying the initial core scope issues may be sufficient to resolve any subsequent elements marked as having 'concerns'. However, if the approach described in a subsequent section is also considered insufficient, then this would also be given a 'fail' grade.

2.6 Clarifications and Additional Information Requests (Regulation 25)

It is important to differentiate between requests for clarifications and requests made under Regulation 25 of the EIA Regulations 2017 ('Regulation 25 requests'). Regulation 25 requests are made where missing information means that the submitted statement does not meet the requirements of the regulations and additional information must be provided, directly relevant to reaching a reasoned conclusion on the likely significant effects, for it to be an 'environmental statement' in line with the regulations. Further information submitted in response to a Regulation 25 request must be re-advertised and LB Camden would not be able to determine the planning application until 30 days after the receipt of the additional information was advertised. Clarifications, meanwhile, address minor queries/inconsistencies within the documentation, which can sometimes arise given the volume of documentation that is submitted alongside an application of this nature and scale.

Tables summarising the review findings and specifying any clarifications and/or Regulation 25 additional information requests to be made to the applicant are provided in each technical review chapter of this report. For ease of reference, where requests are described in the main text, these have been highlighted in bold type. The Applicant is invited to respond/submit further information to address any clarification points/Regulation 25 requests raised.

2.7 Review Report structure

This report is structured as follows:

- Chapter 3: assessment of the regulatory compliance of the ES;
- Chapter 4: review of the EIA context and influence (including scoping, alternatives (including iterative design) and consultation). The topics that have been scoped out are also reviewed in this chapter;
- Chapter 5: review of the presentation and quality of the ES and Non-Technical Summary;
- Chapter 6: review of the Introduction, Proposed Design Amendments and ES Addendum Approach ES Addendum chapter (ES Addendum Chapter 1);
- Chapters 7-14: technical topic specific reviews relating to each technical topic scoped into the ES Addendum; and
- Chapter 15: review if Chapter 13: Summary & Conclusions; and
- Chapter 16: Summary and Conclusions.

3 Regulatory Compliance

Table 3-1 sets out a review of the regulatory compliance of the ES Addendum/updated ES in line with the IEMA EIA Regulatory Compliance Criteria.

Table 3-1 Review of EIA regulatory compliance (IEMA EIA Regulatory Compliance Criteria)

| Criteria | Compliant? | |
|----------|---|--|
| A | Does the ES contain a clear section, or sections, providing a description of the development comprising information on the site, design and size of the development during construction and operation? | Yes. Chapters 3, 4 and 5 of ES Volume 1 describe the application site, the proposed development, and the construction strategy respectively. The proposed development amendments are described in Chapter 1 of Volume 1 of the ES Addendum. |
| B | Does the ES contain a section, or sections, that outline the main alternatives studied by the developer and an indication of the main reasons for their choice, taking into account the environmental effects? | Yes. Chapter 3 of ES Volume 1 provides a description of the alternatives that have been considered and the design evolution that has taken place up to submission of the planning application. Subsequent design evolution that has taken place to realise the amended proposed development is described in Chapter 1 of Volume 1 of the ES Addendum. |
| C | Does the ES contain a clear section, or sections, that provides the data required to identify and assess the main effects which the development is likely to have on the environment? | Yes. Chapters 4 and 5 of ES Volume 1 and Chapter 1 of the ES Addendum provide the necessary information on the amended proposed development and its construction. Topic specific data is provided in each of the technical chapters in ES Volume 1 and ES Volume 2, which have been updated in the ES Addendum (ES Addendum Volume 1, Chapters 6-12, and Volume 2). |
| D | In the light of the development being assessed has the ES identified, described and assessed effects on: <ul style="list-style-type: none"> • Population • Fauna & Flora • Soil • Water • Air • Climatic factors • Landscape • Cultural Heritage • Material Assets • Other* | Yes. For the technical topics scoped into the ES, this information is provided in the technical chapters in ES Volume 1 and ES Volume 2, which have been updated in the ES Addendum (ES Addendum Volume 1, Chapters 6-12, and Volume 2). For the topics scoped out of the ES, this approach was agreed with LB Camden in the EIA Scoping Opinion. Further consideration of the appropriateness of scoping out these topics in the context of the proposed development amendments is provided in Chapter 1 of Volume 1 of the ES Addendum. |
| E | Does the ES attempt to set out the interaction between the factors set out in COM3 D) above? | Yes. Chapter 13 of ES Volume 1 considers the potential for effect interactions, or intra-development cumulative effects, in regard to the technical topics scoped in to the ES. An updated consideration of the potential intra-development cumulative effects in the context of the proposed development amendments is provided in Chapter 13 of Volume 1 of the ES Addendum. |
| F | Does the ES contain a section, or sections, that describe the likely significant effects of the proposed development on the environment, including as reasonably required: direct, indirect, secondary, cumulative, short, medium, long-term, permanent and temporary, positive and negative effects? | Yes. Each technical chapter in ES Volume 1 (Chapters 6-12) and ES Volume 2 includes a section on 'Residual Effects' and a section on 'Likely Significant Effects'. These chapters have been updated in the ES Addendum. |
| G | Does the ES contain a clear section, or sections, that provides a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects? | Yes. Each technical in ES Volume 1 (Chapters 6-12) and ES Volume 2 include a section titled 'Mitigation, Monitoring and Residual Effects'. These chapters have been updated in the ES Addendum. |

| Criteria | | Compliant? |
|----------|--|--|
| | | which clearly sets out any measures required to avoid and reduce significant effects. |
| H | Has a Non-Technical Summary been produced containing an outline of the information mentioned in COM3 A) to G)? | Yes. A stand-alone NTS, which reports on components A to G above, was submitted alongside the planning application. The NTS has been revised to account for the proposed development amendments and has been provided within the ES Addendum submission. |
| I | Does the ES contain a section, or sections, that outline any difficulties encountered by the developer in compiling the information presented in the ES? | Yes. Each technical chapter in ES Volume 1 (Chapters 6-12) and ES Volume 2 include a section on 'Assumptions and Limitations'. These chapters have been updated in the ES Addendum. |

Table 3-2 sets out a review of the regulatory compliance of the ES Addendum/updated ES in line with Regulation 18 and Schedule 4 of the EIA Regulations 2017.

Table 3-2 Review of EIA regulatory compliance (additional criteria based on Regulation 18 and Schedule 4 of the EIA Regulations 2017)

| Criteria | | Compliant? |
|----------|--|--|
| | An ES must, where a scoping opinion or direction has been issued in accordance with regulation 15 or 16, be based on the most recent scoping opinion or direction issued (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion or direction). Has the ES been based on the based on the most recent scoping opinion? | Yes. The ES Addendum/updated ES broadly complies with LB Camden’s Scoping Opinion and references to comments raised in the Scoping Opinion have been made throughout the ES documents. Where any comments raised have not been addressed in the ES Addendum, this is set out in the review of each ES chapter below. |
| | An environmental statement must include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment. Has this been provided? | Yes. This information is provided in the technical chapters in ES Volume 1 and ES Volume 2, which have been updated in the ES Addendum (ES Addendum Volume 1, Chapters 6-12, and Volume 2). |
| | An environmental statement must be prepared, taking into account the results of any relevant UK environmental assessment, which are reasonably available to the person preparing the environmental statement, with a view to avoiding duplication of assessment. Has this been undertaken? | N/A |
| | In order to ensure the completeness and quality of the environmental statement the developer must ensure that the environmental statement is prepared by competent experts; and the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts. Has this been undertaken? | Yes. A Statement of Competence has been provided in Annex 1 of Appendix 1 Introduction (ES Volume 3) for all of the companies that contributed to the EIA/ES. |
| | Does the ES include a reference list detailing the sources used for the descriptions and assessments included in the ES? | Yes. References have been provided throughout the ES as footnotes. |

As set out in the tables above, the ES is considered to meet the necessary regulatory requirements.

4 EIA context & influence

4.1 Scoping

Regulation 15 of the EIA Regulations 2017 makes provision for an applicant to seek a formal scoping opinion from a Local Planning Authority (LPA). The Applicant submitted a Request for an EIA Scoping Opinion 'EIA Scoping Report' in August 2023. As set out in CBRE's ES review, CBRE reviewed the EIA Scoping Report and conformed their agreed with the topics proposed to be scoped in and scoped out of the ES.

Paragraph 2.24, Chapter 2, in Volume 1 of the ES identifies the topics scoped in to the ES. The EIA scoping process is also described in Chapter 2. The sub-topics that have been considered in each technical chapter, as agreed through the scoping process, are clearly set out in the 'key considerations' row of the summary table included at the beginning of each technical chapter in the ES and ES Addendum.

The topics scoped out of the ES are listed in Paragraph 2.25, Chapter 2, ES Volume 1. The text here confirms that this was agreed as part of the EIA scoping exercise and makes reference to the EIA Scoping Report and Scoping Opinion for the justification as to why this is appropriate. Both of these reports are provided as appendices to Chapter 2 of ES Volume 1. In their review of the ES, CBRE concluded that the topics scoped into and out of the ES was acceptable.

The list of scoped in and scoped out topics is reiterated in Paragraphs 1.61 and 1.63, Chapter 1, in Volume 1 of the ES Addendum. Trium advise that, in their view, the topics to be scoped in and out are still appropriate. Given the nature and scale of the proposed development amendments, Buro Happold agree.

Individual sensitive receptors (e.g. individual residential properties) are not listed in the introductory chapters of the ES. However, relevant receptors are set out in the Site and Surrounding Context Section of Chapter 3, ES Volume 1. Individual receptors are also identified within the relevant technical chapters in the ES and ES Addendum. In their review of the ES, CBRE concluded that what had been provided in the ES was sufficient. Buro Happold agree that the additional information provided in the ES Addendum is also sufficient in this regard.

A summary of the findings of the review of the scoping exercise is provided in Table 4-1.

Table 4-1 Summary of Review Against IEMA EIA Context & Influence Criteria: Scoping

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Has the ES clearly stated what environmental topics will be addressed and how this decision was reached? | Pass | None |
| Are the main sensitive receptors and their locations clearly identified with an explanation of the risks posed from the development? | Pass | None |
| Does the ES identify the environmental topics, raised during the scoping process, that will not be assessed and explain why they are not being considered further? | Pass | None |

4.2 Alternatives, including iterative design

The main alternatives studied during the design development process are set out in Chapter 3, Volume 1 of the ES. This includes a 'do nothing scenario', alternative designs, and design evolution. No alternative sites were considered, on the basis that the Applicant has ownership of the site and it is considered an appropriate location for the

development. Chapter 3 in ES Volume 1 also identifies the pre-application consultations undertaken and how they have influenced the design process. The Design Evolution section of Chapter 3, ES Volume 1, sets out the reasons for the selection of the scheme design, including:

- Pre-application discussions with LB Camden;
- Current policy allocation and surrounding land uses;
- Existing poor air quality and noise resulting in a building which is 'not ideal' for residential use;
- Daylight, sunlight and overshadowing considerations;
- Wind conditions;
- Embodied carbon emissions; and
- Protected views.

In their review of the ES, CBRE concluded that the alternatives and iterative design information in the ES was acceptable, with the exception of one clarification, which was subsequently resolved through submission of further information by Trium (letter dated 25 July 2024), and confirmed as acceptable by CBRE in their updated ES Review (September 2024).

The ES Addendum includes a Design Evolution' section in Chapter 1, ES Volume 1. This provides a through description of the evolution of the design following submission of the planning application. Trium advise that the revisions were made in response to feedback from LB Camden Officers, local stakeholders and residents, including the Regents Park Conservation Area Advisory Committee and statutory consultees, including Historic England and The Greater London Authority. They also advise that the amended proposed development design has been heavily influenced by townscape and views. The information provided in the ES Addendum in this regard is considered acceptable.

A summary of the findings of the review of the consideration of alternatives, including iterative design, in the ES Addendum/updated ES is provided in Table 4-2.

Table 4-2 Summary of Review Against IEMA EIA Context & Influence Criteria: Alternatives, including iterative design

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES set out the main alternatives / iterations that were considered at different points during the development of the proposal? | Pass | None |
| Are the main reasons, environmental or otherwise, for the selection of the proposal over distinct alternatives and design iterations easily identifiable? | Pass | None |
| Does the ES clearly indicate how the EIA process, environmental effects and consultee responses influenced the iterative design process that led to the proposed development? | Pass | None |

4.3 Consultation

The consultations undertaken throughout the pre-application stage are discussed in Chapters 2 and 3 of Volume 1 of the ES, and where appropriate in each of the technical chapters of the ES (Chapters 6 to 12). The key statutory consultees who have been contacted are set out in Chapter 3, ES Volume 1. A public consultation exercise was undertaken and a summary of the key themes raised during this process is provided. Comments from LB Camden and the statutory consultees provided in the Scoping Opinion are summarised in tables at the front of each of the technical ES chapters. In their review of the ES, CBRE concluded that the EIA consultation information provided in the ES was acceptable.

Stakeholders consulted with following the submission of the planning application are discussed in Paragraph 1.5, Chapter 1, of the ES Addendum and comments from LB Camden and the statutory consultees provided in the Scoping Opinion are still summarised in the tables at the front of each of the updated technical ES chapters provided in the ES Addendum. Buro Happold considers this information acceptable.

A summary of the findings of the review of the EIA consultation exercise is provided in Table 4-3.

Table 4-3 Summary of Review Against IEMA EIA Context & Influence Criteria: Consultation

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|-----------------------------|---|
| Does the description of any consultation include an indication of those contacted, including statutory and non-statutory consultees, and the public? | Pass | None |
| Does the main text of the ES provide a summary of the main issues, pertinent to the EIA, raised by consultees? | Pass | None |
| Does the ES set out if any of the issues pertinent to the EIA raised by consultees will not be dealt with in the ES? If so is clear justification set out as to why the issue was scoped out? | Pass | None |

5 EIA Presentation & Quality

5.1 ES Quality

In their review of the ES, CBRE concluded that the ES quality was acceptable. They noted the good use of figures, the sensible ES structure and clear signposting in the introduction chapter, the clear description of the site, and the inclusion of a glossary of terms and abbreviations.

The ES Addendum is also sensibly structured, with each section appropriately signposted in Chapter 1. The ES Addendum is also of an appropriate length and there is a good use of figures, including previous and amended red line boundary plans and scheme visualisations. The glossary has been updated in Table 1.1. The current construction programme is provided in Table 1.3. The information provided in the ES Addendum in this regard is considered acceptable.

A summary of the findings of the review of the ES quality is provided in Table 5-1 below.

Table 5-1 Summary of Review Against IEMA EIA Presentation Criteria: ES Quality

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES make effective use of maps, figures, tables and diagrams? In particular covering: - the location of the site, its boundary and site layout; - operational appearance (where available); - main environmental receptors; and - environmental effects (where visual representation is appropriate). | Pass | None |
| Is the proposed development site clearly described? | Pass | None |
| Are the anticipated timescales of construction, operation and (where appropriate) decommissioning of the proposed development clearly set out in the main text? | Pass | None |
| Is the ES presented in a manner that would allow a member of the public to logically locate the environmental information they were seeking? | Pass | None |
| Are technical terms kept to a minimum, with a glossary (/ list of acronyms) provided? | Pass | None |
| Is the length of the main text of the ES appropriate to the: proposed development, sensitivity of the receiving environment and significant environmental effects identified? | Pass | None |

5.2 Non-technical Summary

In their review of the ES, CBRE concluded that the NTS was acceptable. They noted the presentation of the NTS is clear and figures have been used effectively to illustrate the location of the site, proposal, and likely significant effects of the development. They also noted that *'the NTS provides sufficient information to summarise the relevant information reported on in Volume 1 of the ES and provides links to where further information could be obtained should the reader wish to know more. The length of the NTS is considered to be proportionate to the effects identified in relation to the proposed development. The language used is also considered to be appropriate for the purpose of the document and the intended audience.'*

A 'Replacement' NTS has been submitted as part of the ES Addendum. The format is mostly consistent with the previous version, with changes made where necessary to account for the ES updates. The Replacement NTS is considered acceptable.

A summary of the findings of the review of the NTS is provided in Table 5-2 below.

Table 5-2 Summary of Review Against IEMA EIA Presentation Criteria: NTS

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES set out the main alternatives / iterations that were considered at different points during the development of the proposal? | Pass | None |
| Are the main reasons, environmental or otherwise, for the selection of the proposal over distinct alternatives and design iterations easily identifiable? | Pass | None |
| Does the ES clearly indicate how the EIA process, environmental effects and consultee responses influenced the iterative design process that led to the proposed development? | Pass | None |

6 Review of Chapter 1: Introduction, Proposed Design Amendments and ES Addendum Approach

Chapter 1 of Volume 1 of the ES Addendum sets out the introduction to the ES Addendum, as well as information on the proposed design amendments and the ES Addendum methodology.

6.1 Consultation

No responses have been received from consultees in relation to this ES Addendum chapter.

6.2 Euston Tower Addendum Introduction

The introductory information provided in this section, including information on the background to the scheme amendments, an updated glossary, and a summary of the amendments, is considered acceptable.

6.3 Approach to the ES Addendum

The EIA methodology, set out in Chapter 2 of the main volume of the ES, was reviewed by CBRE. With the exception of one clarification that was requested, the methodology was deemed acceptable. The clarification that was raised is as follows:

"Paragraph 2.51 explains different classifications for the duration of effects, including; short-term, medium-term, long-term, temporary and permanent. However, no definitions or specific durations are provided (e.g short-term equates to 6 months). This kind of distinction is recommended. Clarification should be provided to confirm if these terms have been provided consistently throughout the ES."

In their second response to the ES Review (letter dated November 2024), Trium advised that *"In the ES Addendum for the post submission design changes, each topic will provide a definition of short term, medium term and long term as relevant."*

Buro Happold has reviewed the updated technical chapters provided in the ES Addendum and definitions for 'short term', 'medium term' and 'long term' do not appear to have been provided. This clarification request therefore remains outstanding.

The approach to the ES Addendum methodology is clearly explained in this section of Chapter 1, including aspects that remain consistent with the approach set out in the ES. The information is considered acceptable.

6.4 Design Evolution

This section has been reviewed in Chapter 4 of this ES Addendum review.

6.5 Amended Proposed Development

The proposed development description, set out in Chapter 4 of the main volume of the ES, was reviewed by CBRE. CBRE concluded that the chapter was acceptable, with the exception of one clarification, which was subsequently resolved

through submission of further information by Trium (letter dated 25 July 2024), and confirmed as acceptable by CBRE in their updated ES Review (September 2024).

The Amended Proposed Development section of Chapter 1 of the ES Addendum sets out a thorough description of the aspects of the proposed development that have been amended. The information is considered acceptable.

6.6 Deconstruction & Construction

The proposed demolition and construction strategy, set out Chapter 5 of the main volume of the ES, was reviewed by CBRE. CBRE concluded that the chapter was acceptable, with the exception of one clarification, which was subsequently resolved through submission of further information by Trium (letter dated 25 July 2024), and confirmed as acceptable by CBRE in their updated ES Review (September 2024).

The Deconstruction & Construction section of Chapter 1 of the ES Addendum sets out a description of the aspects of the deconstruction and construction works that have been amended, including an updated deconstruction and construction programme and construction material quantities. The information is considered acceptable.

6.7 Structure of the 2021 ES Addendum

The proposed approach to scoping in and scoping out topics from the ES/ES Addendum has been reviewed in Chapter 4 of this ES Addendum review.

Changes in planning policy since the ES was submitted have been discussed in this section. The latest version of the National Planning Policy Framework (NPPF) considered in the ES Addendum is the December 2023 version. There is now a more recent version (December 2024); however, this was published following the submission of the ES Addendum and, as such, consideration of the December 2023 version is acceptable. Changes in legislation, policy, and guidance have also been discussed in each of the updated technical chapters; however the updated December 2023 version of the NPPF is not referenced in these sections. **Clarification is requested as to whether the December 2023 version of the NPPF has been considered in each of the updated chapters/assessments.**

No additional cumulative schemes have been identified and, as such, the cumulative scheme list remains unchanged.

The information in this section is considered acceptable.

Provided in Table 6-1 is a summary of the required clarifications and Regulation 25 requests in relation to this chapter.

Table 6-1 Summary of Review of ES Addendum Chapter 1 Introduction, Proposed Design Amendments and ES Addendum Approach

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|-----------------------|----------------------|--|
| ES Addendum Chapter 1 | Concerns | <p>Clarifications:</p> <ul style="list-style-type: none"> • Definitions for 'short term', 'medium term' and 'long term' effects should be provided for each technical topic chapter scoped into the ES/ES Addendum. • Changes in legislation, policy, and guidance have been discussed in each of the updated technical chapters; however the updated December 2023 version of the NPPF is not referenced in these sections. Clarification is requested as to whether the December 2023 version of the NPPF has been considered in each of the updated chapters/assessments. <p>Regulation 25 requests: None</p> |

7 Review of Chapter 6: Socio-economics

Chapter 6 of Volume 1 of the ES Addendum comprises an updated version of the Socio-economics ES chapter, taking into account the proposed development amendments.

7.1 Consultation

No consultation responses have been received in relation to this ES Addendum chapter.

7.2 CBRE ES Review

In their review of the ES, CBRE awarded the Socio-economics ES chapter a pass and raised no clarification requests.

7.3 Buro Happold ES Addendum Review

7.3.1 Baseline

The baseline conditions are reported in the Baseline Conditions section of the original version of the chapter. This section is detailed, with information presented clearly and consistently, including descriptions of local population demographics, the local economy and social infrastructure provision. CBRE awarded this a pass. Trium advise in the updated version of the chapter that baseline conditions have not materially altered from those set out in the December 2023 ES, and therefore they have not been revisited. Buro Happold agree this is acceptable.

The criteria for assigning receptor sensitivity are set out in Paragraph 6.27 of the original version of the chapter. The criteria are based on variations in existing capacity and geographic scales, and unemployment levels. In their review, CBRE noted that an element of professional judgement is required to assign sensitivity for social infrastructure and in particular open space. The criteria were awarded a pass by CBRE. No changes have been made to the criteria in the updated chapter. Buro Happold considers this acceptable.

The receptors considered in the assessment, and the sensitivity of these receptors, are set out in Table 6.5 in the original ES chapter. CBRE awarded the sensitivity assessment a pass. Given that no changes have been made to the receptors or the baseline conditions, Table 6.5 has not been updated in the updated chapter. Buro Happold considers this acceptable.

A summary of the findings of the baseline review is provided in Table 7-1.

Table 7-1 Summary of Chapter Review Against IEMA EIA Content Criteria: Baseline

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? | Pass | None |
| Is the 'sensitivity' of the baseline environment clearly evaluated? | Pass | None |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? | Pass | None |

7.3.2 Assessment & Environmental Mitigation & Management

The criteria for assessing impact magnitude and effect significance are set out in Paragraph 6.28 and Table 6.2 in the original version of the chapter respectively. The criteria were awarded a pass by CBRE. No changes have been made to the criteria in the updated chapter. Buro Happold considers this acceptable.

The original ES chapter assesses the likely effects of the deconstruction and construction stage, the completed development stage and inter-development cumulative effects in combination with other forthcoming developments in the local area. It gives appropriate consideration to both adverse and beneficial effects. The various aspects of the assessment were awarded a pass by CBRE.

The assessment has been amended in the updated ES chapter to account for anticipated changes to the number of jobs generated and associated local expenditure during both the construction and operational stages, brought about by the scheme amendments. The assessment approach, including the use of a 'best-case scenario' and 'most likely worst-case scenario', remains unchanged. Where there have been changes to the previous assessment results, the change has generally been highlighted clearly in the text. The significance of effect results, including cumulative effects, remain unchanged. The updated assessment is considered acceptable.

No embedded or additional mitigation has been proposed. As such, the residual effects remain consistent with the pre-mitigation effects.

A summary of the assessment and environmental mitigation and management review is set out in Table 7-2.

Table 7-2 Summary of Chapter Review Against IEMA EIA Content Criteria: Assessment & Environmental Mitigation & Management

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined? | Pass | None |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? | Pass | None |
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? | Pass | None |
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? | Pass | None |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? | Pass | None |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? | Pass | None |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? | Pass | None |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? | Pass | None |
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? | Pass | None |

8 Review of Chapter 7: Traffic & Transport

Chapter 7 of Volume 1 of the ES Addendum comprises an updated version of the Traffic & Transport ES chapter, taking into account the proposed development amendments.

8.1 Consultation

Responses have been received from the following consultees in relation to this ES chapter:

- Transport for London (TfL); and
- Transport Strategy Service, LB Camden.

8.2 CBRE ES Review

In their review of the ES, CBRE awarded the Traffic & Transport ES chapter a pass. They raised three clarification requests, which were subsequently resolved through submission of further information by Trium (letter dated 25 July 2024), and confirmed as acceptable by CBRE in their updated ES Review (September 2024), as set out in Table 8-1 below.

Table 8-1 Summary of CBRE ES Review Clarification Requests for this ES chapter

| CBRE Clarification Request | Trium Response | CBRE Review of Response |
|---|---|--|
| There is no discussion of the effect that the relocation of the bus stop on Hampstead Road would have during the Deconstruction and Construction stage. While it is identified to be a temporary long-term effect (i.e. more than 5 years), it is not clear from the Transport Chapter, or Chapter 5, whether the relocation of the bus stop would be a permanent alteration. It is therefore requested that the Applicant should clarify this. | The relocation of the bus stop along Hampstead Road will not be permanent. As The bus stop will be relocated approximately 15-20m north of its current location during the deconstruction and construction of the Proposed Development and will be returned to its existing location once construction is complete. | Clarification response noted. No further information needed. |
| The anticipated total person trip rates have been generated using the TRICS database. The Transport Strategy Service request that the Applicant provide the full TRICS output. | The full TRICS output is included in Appendix A of Trium letter dated 25 July 2024. | TRICS output noted. It is assumed that this has also been sent by the Applicant to the Transport Strategy Service. |
| While it is considered that any trips associated with the disabled car parking would be negligible, the Applicant should provide clarification as to whether this trip generation exercise includes any daily trips associated with the disabled car parking spaces proposed. | No trip assessment was undertaken for the two blue badge parking spaces provided as part of the Proposed Development as any trips associated with these bays were considered to be negligible as set out in the 'Impact Assessment Methodology' section of ES Volume 1, Chapter 7: Traffic and Transport. | Clarification response noted. No further information needed. |

8.3 Buro Happold ES Addendum Review

8.3.1 Baseline

The baseline conditions are reported in the Baseline Conditions section of the original version of the chapter. It includes a generally thorough description of the relevant conditions. For the purpose of the assessment, it has been assumed that no trips are generated from the site in the baseline situation (as this constitutes a more conservative assumption when considering changes in vehicle trips from the development when compared to the baseline). CBRE awarded this a pass. Trium advise in the updated version of the chapter that baseline conditions remain unchanged from those set out in the December 2023 ES, and therefore this has not been revisited. Buro Happold agree this is acceptable.

The criteria for assigning receptor sensitivity are set out in Table 7.5 of the original version of the chapter, with further supporting explanation and receptor sensitivity judgements set out in Paragraphs 7.166 to 7.171 and Table 7.11. The criteria take into account the specific users of each link, their usage volumes, and whether interactions between different users could arise. Clear justification has been provided for each of the sensitivity judgements. The criteria were awarded a pass by CBRE. No changes have been made to the criteria in the updated chapter. Buro Happold considers this acceptable.

The assumptions and limitations of the assessment are set out in Paragraphs 7.87 and 7.88 of the original version of the chapter. In their review, CBRE confirmed that in their view, these are acceptable, stating *“these assumptions and limitations are typical for an assessment of this type and are not expected to affect the validity of the outcome of the assessment.”* The assumptions and limitations remain unchanged in the updated chapter. Buro Happold considers this acceptable.

A summary of the findings of the baseline review is provided in Table 8-2.

Table 8-2 Summary of Chapter Review Against IEMA EIA Content Criteria: Baseline

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? | Pass | None |
| Is the ‘sensitivity’ of the baseline environment clearly evaluated? | Pass | None |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? | Pass | None |

8.3.2 Assessment & Environmental Mitigation & Management

The criteria for establishing the magnitude of impact and scale and significance of effect are set out in Tables 7.6 and 7.7 respectively in the original version of the chapter, with further explanation provided in the prior text. The methodology is primarily based on the IEMA Guidance: Environmental Assessment of Traffic and Movement (July 2023). Whilst the impact magnitude criteria for pedestrian and cyclist delay, bus delay and vehicle delay are all based on professional judgement with no quantitative elements included, justification for each impact magnitude judgement has been provided later in the chapter, which helps to give some transparency/repeatability to the methodology. CBRE awarded the approach a pass. No changes have been made to the criteria in the updated chapter. Buro Happold considers this acceptable.

The original ES chapter assesses the likely effects of the deconstruction and construction stage and the completed development stage, as well as the inter-development cumulative effects in combination with other forthcoming developments in the local area. It gives appropriate consideration to both adverse and beneficial effects and the data/information required to understand how the assessment judgements have been reached has been provided (include further clarifications submitted by Trium in July 2024). Where there is uncertainty, a conservative scenario has been assessed. The various aspects of the assessment were awarded a pass by CBRE. Trium advise in the updated chapter that this information remains unchanged. Buro Happold considers this acceptable.

Following the discussion of the effects in the Potential Effects section in the original version of the chapter, the proposed mitigation and anticipated residual effects are set out. The chapter clearly sets out how each mitigation measure will be secured and implemented. This aspect was awarded a pass by CBRE. Trium advise in the updated chapter that the mitigation, and therefore also the residual effects, remain unchanged. Buro Happold considers this acceptable.

CBRE awarded the inter-development cumulative assessment reported in the original version of the chapter a pass. One change to the cumulative assessment has been given consideration in the updated chapter – the announced recommencement of the High Speed Two (HS2) rail infrastructure project, which could result in cumulative construction traffic impacts on local roads. Qualitative consideration has been given to this potential cumulative impact. Due to various factors, including the minimal construction programme overlaps and the ambition for the applicants/developers to work together to manage potential effects, significant cumulative effects are not anticipated. Buro Happold considers this acceptable.

Subject to a number of planning conditions and planning obligations, both TfL and LB Camden’s Transport Strategy Service confirmed the amended proposed development is acceptable in terms of transport implications.

A summary of the assessment and environmental mitigation and management review is set out in Table 8-3.

Table 8-3 Summary of Chapter Review Against IEMA EIA Content Criteria: Assessment & Environmental Mitigation & Management

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Are the methods for establishing the ‘magnitude’ of effects on the receiving environment clearly defined? | Pass | None |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? | Pass | None |
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? | Pass | None |
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? | Pass | None |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? | Pass | None |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? | Pass | None |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? | Pass | None |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? | Pass | None |

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? | Pass | None |

9 Review of Chapter 8: Air Quality

Chapter 8 of Volume 1 of the ES Addendum comprises an updated version of the Air Quality ES chapter, taking into account the proposed development amendments.

9.1 Consultation

Responses have been received from the following consultees in relation to this ES chapter:

- Greater London Authority (GLA).

9.2 CBRE ES Review

In their review of the ES, CBRE awarded the Air Quality ES chapter a pass. They raised one clarification request, which was subsequently resolved through submission of further information by Trium (letter dated 25 July 2024), and confirmed as acceptable by CBRE in their updated ES Review (September 2024), as set out in Table 9-1 below.

Table 9-1 Summary of CBRE ES Review Clarification Requests for this ES chapter

| CBRE Clarification Request | Trium Response | CBRE Review of Response |
|--|--|---|
| <p>It is noted that there is no assessment of energy plant as the size and emission rate of the two options being considered is not currently known. The formal request for an EIA Scoping Opinion, states “life safety generator, sprinklers and wet riser are currently being considered. If the details of the plant are available, the emissions will be initially screened against IAQM guidance, in combination with their proposed location, operating profile and dispersion parameters, to identify whether a detailed assessment of emissions is required”. While the applicant has made it clear that full details of the life safety generator are not known, it is queried whether a conservative assessment could be undertaken based on the available information. The applicant makes no reference of the likelihood of either energy plant option resulting in significant environmental effects and recommends (paragraph 8.57) that the selected option is assessed to discharge a planning condition attached to any future consent. While this is not uncommon, the applicant should either provide limits that would be achieved to ensure no significant effects would occur or undertake an assessment of the plant likely to be included to identify that with its intended limited use, no significant effects would be anticipated.</p> | <p>The Applicant is not seeking to provide on-site life safety generators within the Proposed Development, however, for completeness a space planning exercise was undertaken such that in the unlikely event that a life safety generator is required, this can be accommodated within the design of the Proposed Development. As such, an assessment of life safety generator emissions was not undertaken as there is insufficient information available with which to undertake a meaningful assessment. Any assessment would require a number of worst-case assumption for parameters such as NOx emissions and flue temperatures, which are unlikely to reflect the final design of the life safety generator which may be installed. Therefore, it is suggested that an assessment is undertaken if it is determined that a life safety generator is required, and the plans for the life-safety generator have been finalised, to confirm air quality effects associated with the use of the life safety generator are likely. It is proposed that this is secured via an appropriately worded planning condition. If the assessment identifies a risk of significant effects, the design of the life safety generator will be revised, to ensure there are no significant impacts on local air quality.</p> | <p>Clarification response notes. On the basis that generators are not anticipated as part of the Proposed Development. CBRE agree that further assessment can be undertaken to discharge a condition attached to any future planning permission should they be proposed. No further information needed.</p> |

9.3 Buro Happold ES Addendum Review

9.3.1 Baseline

The baseline conditions are described in Paragraphs 8.91 to 8.105 in the original version of the chapter. Both existing and introduced receptors have been considered. The approach to receptor sensitivity is set out in Paragraphs 8.65 to 8.69 and 8.111 to 8.113, including the approach taken to the identification of representative 'worst case' existing receptors for inclusion in the construction and operational traffic assessment. CBRE awarded the baseline conditions and approach to receptor sensitivity a pass. The updated version of the chapter advises that the baseline conditions remain similar to those set out in the original chapter, and therefore they have not been revisited. The assessment methodology also remains unchanged. Buro Happold agree this is acceptable.

Limitations of relevance to the baseline conditions are set out in the original chapter and remain unchanged in the updated chapter.

A summary of the findings of the baseline review is provided in Table 9-2.

Table 9-2 Summary of Chapter Review Against IEMA EIA Content Criteria: Baseline

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? | Pass | None |
| Is the 'sensitivity' of the baseline environment clearly evaluated? | Pass | None |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? | Pass | None |

9.3.2 Assessment & Environmental Mitigation & Management

In their review of the ES, CBRE stated that, in their view, the assessment criteria set out in the 'Assessment Criteria' and 'Impact Assessment Methodology' sections of the original ES chapter are considered appropriate and awarded a pass.

The original chapter clearly identifies the likely effects of the proposed development during the deconstruction and construction stage, the completed development stage and cumulatively with other forthcoming developments in the surrounding area. It sets out the mitigation proposed in order to ensure that no significant effects would occur and how these would be secured, e.g. 'by suitably worded planning condition'. CBRE awarded all of these aspects a pass and the one clarification raised was subsequently resolved (as set out above).

As set out in the updated chapter, the change to the construction programme leads to completion a year later than assessed in the original chapter, which assessed a first year of occupation of 2030. However, considering an earlier assessment year is considered 'worst-case' because emission factors and background concentrations are expected to reduce with each year to reflect the transition in the vehicle fleet composition towards cleaner vehicles along with the implementation of local air quality measures. The amendments are also expected to lead to a minor decrease (by approximately 2 trips per day) in the HGV trips generated during the peak construction year from those considered in the original chapter. The previous assessment is therefore considered to already assess a worst case and, as such, does not need to be updated. Buro Happold agree with this approach.

Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction v2.2, was published in January 2024 and replaces the old IAQM guidance document which was used in the previous

assessment. The dust emission magnitude of the earthworks would change from medium to small under the new guidance, resulting in a requirement for less stringent earthworks mitigation measures. Given that a worst case scenario has already been assessed, further assessment has not been considered necessary. Buro Happold agree with this approach.

Similarly the amendments are, at most, expecting to result in non-material changes to the operational phase effects, with the previous assessment still representing a worst case in each case. The significance of the anticipated effects remain unchanged. Buro Happold agree with this approach.

The proposed mitigation and residual effects remain unchanged. Whilst the cumulative effects are also expected to remain consistent despite the announced recommencement of the High Speed Two (HS2) rail infrastructure project. Buro Happold agree this is acceptable.

In their consultation response to the ES Addendum, the GLA confirm that no further response is required in regard to air quality matters and have recommended planning conditions.

A summary of the findings of the assessment and environmental mitigation and management review is set out in Table 9-3.

Table 9-3 Summary of Chapter Review Against IEMA EIA Content Criteria: Assessment & Environmental Mitigation & Management

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined? | Pass | None |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? | Pass | None |
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? | Pass | None |
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? | Pass | None |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? | Pass | None |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? | Pass | None |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? | Pass | None |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? | Pass | None |
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? | Pass | None |

10 Review of Chapter 9: Noise & Vibration

Chapter 9 of Volume 1 of the ES Addendum comprises an updated version of the Noise & Vibration ES chapter, taking into account the proposed development amendments.

10.1 Consultation

Responses have been received from the following consultees in relation to this ES chapter:

- LB Camden Environmental Health.

10.2 CBRE ES Review

In their review of the ES, CBRE awarded the Noise & Vibration ES chapter a pass and raised no clarification requests.

10.3 Buro Happold ES Addendum Review

10.3.1 Baseline

The baseline conditions of relevance to the scheme are presented in paragraphs 9.57 to 9.59 in the original version of the chapter. Existing receptors considered in the assessment are set out in Table 9.16 and the sensitivity of those receptors have been assessed in accordance with the criteria set out in Table 9.6. CBRE awarded the baseline conditions and approach to receptor sensitivity a pass in their ES review. The updated version of the chapter advises that the baseline conditions remain unchanged, and therefore they have not been revisited in the updated chapter. The assessment methodology also remains unchanged. Buro Happold agree this is acceptable.

Assumptions and limitations of relevance to the baseline conditions are clearly identified in paragraphs 9.38 to 9.41 in the original chapter and remain unchanged in the updated chapter.

A summary of the findings of the baseline review is provided in Table 10-1.

Table 10-1 Summary of Chapter Review Against IEMA EIA Content Criteria: Baseline

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? | Pass | None |
| Is the 'sensitivity' of the baseline environment clearly evaluated? | Pass | None |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? | Pass | None |

10.3.2 Assessment & Environmental Mitigation & Management

The magnitude of impact criteria are set out for each individual element in the original ES chapter, alongside references to the guidance documents which have informed each criterion. A significance matrix is provided in Table 9.12 and Table 9.13 provides an explanation of the classification of the effects. Table 9.13 also identifies how each

scale / significance of effect category relates to the LOAEL and SOAE. In their review, CBRE awarded a pass to the assessment methodology.

The original chapter clearly identifies the likely effects of the proposed development during the deconstruction and construction stage, the completed development stage and cumulatively with other forthcoming developments in the surrounding area. The measures proposed to be implemented to mitigate the effects of the deconstruction and construction stage are anticipated to be implemented through a Construction Management Plan and Section 61 consent. This includes monitoring to ensure that Best Practicable Means are sufficient to reduce the significant noise effect on the residential Triton Building (receptor B). The chapter clearly sets out the effectiveness of the mitigation presented, with all significant effects being reduced to ‘not significant’ following their implementation. In their ES consultation response, the LB Camden Environmental Health Officer stated no objections, and that they were “satisfied that the submitted acoustic submission meets our local plan guidelines and therefore acceptable in environmental health terms”. Mitigation was not required in relation to the operational phase. CBRE awarded a pass to all of these aspects in their ES review.

As set out in the updated chapter, the amendments are expected to lead to a minor decrease (by approximately 2 trips per day) in the HGV trips generated during the peak construction year from those considered in the original chapter. The previous construction traffic noise assessment is therefore considered to already assess a worst case and, as such, does not need to be updated. No changes are anticipated to the construction noise assessment. Buro Happold agree this is acceptable.

Despite the amendments, the noise from operational road traffic from the proposed development remains as predicted in the original chapter. The plant noise limits and methods to control atmospheric plant noise emissions also remain as previously presented. Buro Happold agree this is acceptable.

The proposed mitigation and residual effects remain unchanged. Due to various factors, including distance between the sites, minimal overlap between construction programmes, and the assumed implementation of the proposed measures set out in the High Speed Two Phase One Information Paper E23: Control of Construction Noise and Vibration, the inter-development cumulative effects are also expected to remain broadly consistent with those reported in the original chapter, despite the announced recommencement of the High Speed Two (HS2) rail infrastructure project. Buro Happold agree this is acceptable.

In their consultation response to the ES Addendum, LB Camden’s Environmental Health team have confirmed that they are satisfied with the noise assessment and have no objection to the application.

A summary of the assessment and environmental mitigation and management review is set out in Table 10-2

Table 10-2 Summary of Chapter Review Against IEMA EIA Content Criteria: Assessment & Environmental Mitigation & Management

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Are the methods for establishing the ‘magnitude’ of effects on the receiving environment clearly defined? | Pass | None |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? | Pass | None |
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? | Pass | None |

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? | Pass | None |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? | Pass | None |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? | Pass | None |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? | Pass | None |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? | Pass | None |
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? | Pass | None |

11 Review of Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare

Chapter 10 of Volume 1 of the ES Addendum comprises an updated version of the Daylight, Sunlight, Overshadowing and Solar Glare ES chapter, taking into account the proposed development amendments.

11.1 Consultation

No consultation responses have been received in relation to this ES Addendum chapter.

11.2 CBRE ES Review

In their review of the ES, CBRE awarded the Daylight, Sunlight, Overshadowing and Solar Glare ES chapter a pass and raised no clarification requests.

11.3 Buro Happold ES Addendum Review

11.3.1 Baseline

In their review of the original ES chapter, CBRE awarded a pass to the approach to the assessment of receptor sensitivity and the reporting of the baseline conditions. They also commented that the assumptions and limitations set out in the chapter are *"typical for an assessment of this type and are not expected to affect the validity of the outcome of the assessment"*.

The updated version of the chapter has not led to any changes to these aspects. This information has been retained and is presented in the same format in the updated chapter. Buro Happold considers this acceptable.

A summary of the findings of the baseline review is provided in Table 11-1.

Table 11-1 Summary of Chapter Review Against IEMA EIA Content Criteria: Baseline

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? | Pass | None |
| Is the 'sensitivity' of the baseline environment clearly evaluated? | Pass | None |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? | Pass | None |

11.3.2 Assessment & Environmental Mitigation & Management

In their review of the original ES chapter, CBRE awarded a pass to the various aspects of the assessment methodology, and the reporting of the assessment results. The assessment has focused on the operational phase of the scheme, as agreed with CBRE. Other than embedded mitigation, no mitigation was proposed and, as such, no assessment of residual effects was undertaken. Due to their distance from the site, it was judged that none of the cumulative

schemes had the potential to result in significant cumulative effects in combination with the proposed development and, as such, an inter-development cumulative assessment was also scoped out.

The assessment methodology and the format of the reporting of the results remain unchanged in the updated chapter. The approach to mitigation and inter-development cumulative effects also remains unchanged. The main changes are the inclusion of one additional viewpoint in the solar glare assessment and the assessment has been completed again in its entirety to account for the scheme design amendments. There has also been a change to the reporting of the residual effects in Table 10.12. In the original chapter, negligible effects were reported for properties where a sunlight assessment was not considered necessary and was therefore scoped out. In the updated chapter, sunlight effects for these properties have instead been reported as 'n/a'. Buro Happold agree this is a more accurate approach to reporting. Overall, Buro Happold considers the assessment reported in the updated chapter acceptable.

A summary of the assessment and environmental mitigation and management review is set out in Table 11-2.

Table 11-2 Summary of Chapter Review Against IEMA EIA Content Criteria: Assessment & Environmental Mitigation & Management

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined? | Pass | None |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? | Pass | None |
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? | Pass | None |
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? | Pass | None |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? | Pass | None |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? | Pass | None |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? | Pass | None |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? | Pass | None |
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? | Pass | None |

12 Review of Chapter 11: Wind Microclimate

Chapter 11 of Volume 1 of the ES Addendum comprises an updated version of the Wind Microclimate ES chapter, taking into account the proposed development amendments.

12.1 Consultation

No consultation responses have been received in relation to this ES Addendum chapter.

12.2 CBRE ES Review

In their review of the ES, CBRE awarded the Wind Microclimate ES chapter 'concerns'. They raised four clarifications, some of which were resolved through the submission of further information by Trium as set out in Table 12-1 below. Trium have proposed to resolve the remaining clarifications through the inclusion of additional information in the updated ES chapter, within the ES Addendum.

Table 12-1 Summary of CBRE ES Review Clarification Requests for this ES chapter

| CBRE Clarification Request | Trium Response (July 2024) | CBRE Review of Response | Trium Response (November 2024) |
|---|---|--|---|
| The inclusion of private off-site balconies as a receptor was requested through the Scoping Opinion. The ES chapter has referenced this request and has scoped out further consideration of off-site balconies on the basis that all balconies that could be affected by the development already include some form of sheltering. However, it is the opinion of CBRE that off-site balconies should have been included in the assessment as they are identified as a critical pedestrian-level location / monitoring location in City of London Wind Microclimate Guidelines. Further testing of the effects at these receptors should be provided. | <p>The wind microclimate assessment within ES Volume 1, Chapter 11: Wind Microclimate utilises the Lawson Comfort Criteria (the London Docklands Development Corporation (LDDC) version) as the basis of assessment, and not the City of London Wind Microclimate Guidelines as set out in the EIA Scoping Report and which was agreed as part of LBC's EIA Scoping Opinion. The Lawson LDDC Criteria does not provide target thresholds for occasional use 'good weather' spaces, such as off-site balconies.</p> <p>However, a target wind condition of 'Standing' or better in the summer condition, as described by the Lawson LDDC criteria, was selected to represent a comfortable threshold for off-site balconies. Using professional judgement, given all the balconies within the zone of influence of the Proposed Development, include one or more significant sheltering features (e.g. solid balustrades, porous screening elements etc.), these areas are considered to experience acceptably calm wind conditions and are not expected to be adversely affected by any</p> | <p>While it is noted that the LDDC criteria has been used, paragraph 7 of the Wind Microclimate Topic Sheet references balconies as onsite receptors. The topic sheet goes on to state that the assessment will consider the "usability for a range of pedestrian and amenity activities as set out above at paragraph 7". CBRE's Euston Tower. EIA Scoping Report Review notes this and also stated "the applicant should also give consideration to any off-site balcony locations." Therefore, consideration should have been given to on and off-site balconies. Outcome remains as 'Concerns'</p> | <p>Qualitative narrative will be provided in the ES Addendum Chapter on off-site balconies.</p> <p>As discussed with CBRE in the meeting on the 23 October, off site balcony assessments cannot be undertaken and are not a policy or guidance requirement in the LBC.</p> <p>However, professional judgment based on a wealth of experience and the large amount of wind tunnel testing in the area will be utilised to provide a summary of anticipated conditions at off-site balconies and their acceptability.</p> |

| CBRE Clarification Request | Trium Response (July 2024) | CBRE Review of Response | Trium Response (November 2024) |
|--|---|---|--|
| | changes created by the Proposed Development. | | |
| <p>It is acknowledged in paragraph 11.160 that no separate cumulative configuration has been tested on the basis that only one cumulative scheme is located within the defined study area and, as this is partially built, this has been included in Configurations 2 and 3. CBRE consider this approach to be broadly acceptable, however clarification is sought as to whether this scheme was also included in Configuration 1 as well.</p> | <p>The cumulative schemes (Network Building (95-100 Tottenham Court Road), 76- 80 Whitfield Street and 88 Whitfield Street, London, W1T 4TP) was not included within Configuration 1. However, from a qualitative review of the size and location of the cumulative scheme (located more than 300m south-east of the site), it is considered that the presence of the building would not have a material impact on the baseline condition presented within Configuration 1. As acknowledged, these buildings were included in Configurations 2 and 3.</p> | <p>The inclusion of this scheme in all configurations would have been preferred in order to ensure that the changes are as a result of the Proposed Development only. However, appreciating the distance and size of the cumulative scheme from the site, and no further information is needed.</p> | <p>Clarification closed out.</p> |
| <p>It is however noted that off-site mitigation in the form of existing Transport for London (TfL) trees is being relied on. CBRE appreciate that testing has been done without the TfL landscaping (configuration 2) and that the Applicant has acknowledge that these trees have an impact on the local wind conditions. However, CBRE have concerns that there is no way to secure this mitigation. Therefore, the Applicant is requested to confirm how the effects would be managed should this be removed.</p> | <p>The proposed landscaping is currently being reviewed by the Applicant and Design Team. Further testing will be undertaken and additional information will be submitted to LBC, which will detail the landscaping tested, and how it will be secured.</p> | <p>No comment can be provided until the further information is provided. Outcome remains as 'Concerns'</p> | <p>The existing trees are not specific mitigation introduced by the Applicant, they form part of the existing baseline. It is common practise in wind assessments to utilise existing baseline conditions and is in line with the EIA Regulations.</p> |
| <p>Paragraph 11.158 identifies that the final mitigation has not been tested and is determined based on professional judgement, while it is acknowledged that this provides a useful commentary on the likely outcome of the implementation of this mitigation, CBRE would expect this to be confirmed by additional testing. It would be anticipated that this would be completed to discharge a suitably worded planning condition. It is not clear as to why the additional mitigation was not tested along with all the other measures. Clarification is sought as to why this was not done. Clarification is also sought as to how this mitigation measure would be secured to ensure its implementation.</p> | <p>Additional testing of the final proposed mitigation will be undertaken and the conclusions this testing will included as part of further information to be submitted to LBC by the Applicant.</p> | <p>No comment can be provided until the further information is provided. Outcome remains as 'Concerns'</p> | <p>As discussed with CBRE on 23 October, all final proposed mitigation will be tested within the wind tunnel and form part of the proposals and ES Chapter.</p> |

12.3 Buro Happold ES Addendum Review

12.3.1 Baseline

In their review of the original ES chapter, CBRE confirmed that the reporting of the baseline conditions was acceptable, as was the approach to the consideration of receptor sensitivity. The limitations and assumptions were also considered acceptable. The updated version of the chapter has not led to any changes to these aspects.

The sensitive receptors considered in the original ES chapter were also generally accepted by CBRE, with the exception of the approach to the consideration of off-site balconies. Trium subsequently submitted further justification and have provided a more thorough qualitative consideration of potential impacts on the off-site balconies in the updated chapter.

Buro Happold note the technical challenges associated with attempting to model off-site balconies in the wind tunnel. We also note the presence of existing sheltering features in the balconies (including some that are recessed) and that a more thorough qualitative assessment undertaken by the wind specialist set out in the updated chapter has concluded that significant effects are unlikely to arise. On this basis, and taking into account that these are private, rather than public spaces, Buro Happold agree that the approach applied in the updated chapter is acceptable.

A summary of the findings of the baseline review is provided in Table 12-2.

Table 12-2 Summary of Chapter Review Against IEMA EIA Content Criteria: Baseline

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? | Pass | None |
| Is the 'sensitivity' of the baseline environment clearly evaluated? | Pass | None |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? | Pass | None |

12.3.2 Assessment & Environmental Mitigation & Management

In their review of the original ES chapter, CBRE confirmed their agreement with the various aspects of the pre-mitigation assessment methodology, and the reporting of the assessment results. The assessment has focused on the operational phase of the scheme, as agreed with CBRE. CBRE confirmed their agreement with the cumulative assessment approach. Due to their distance from the site, only one scheme fell within the bounds of the wind tunnel model. However, as this scheme was partially built, the decision was made to include it in the proposed development scenarios, rather than in a separate inter-development cumulative effects scenario.

The assessment methodology and the format of the reporting of the results remain unchanged in the updated chapter. The approach to inter-development cumulative effects also remains unchanged. Other than the additional commentary on the likely effects on off-site balconies, discussed above, the main change to the updated chapter comprises an update to the assessment in its entirety to account for the scheme design amendments. Buro Happold considers the amended pre-mitigation assessment reported in the updated chapter acceptable.

Whilst CBRE were generally in agreement with proposed mitigation set out in the original ES chapter, they raised concerns regarding two aspects of the mitigation approach. The first clarification request was as follows:

“off-site mitigation in the form of existing Transport for London (TfL) trees is being relied on. CBRE appreciate that testing has been done without the TfL landscaping (configuration 2) and that the Applicant has acknowledge that these trees have an impact on the local wind conditions. However, CBRE have concerns that there is no way to secure this mitigation. Therefore, the Applicant is requested to confirm how the effects would be managed should this be removed.”

In their November 2024 response, Trium clarified that *“the existing trees are not specific mitigation introduced by the Applicant, they form part of the existing baseline. It is common practise in wind assessments to utilise existing baseline conditions and is in line with the EIA Regulations.”* Buro Happold agree that it is typical practice to include such aspects in the baseline. The approach to the consideration of the existing TfL trees in updated assessment is considered acceptable.

CBRE also queried why the final mitigation had not been wind tunnel tested and why the residual effects had therefore only been considered based on professional judgement. In response, the updated chapter includes three additional mitigation scenarios (Scenarios 4a, 4b, and 4c) that have been fully tested in the wind tunnel. The proposed mitigation in Scenario 4a successfully mitigated the majority of anticipated adverse effects, whilst the additional mitigation tested in Scenarios 4b and 4c focused on resolving the remaining comfort exceedances at a small number of balcony and terrace locations within the proposed development. With the incorporation of the proposed mitigation, all residual effects are expected to be negligible. The updated testing of the mitigation measures and the reporting of the results in the updated chapter are considered acceptable by Buro Happold.

A summary of the assessment and environmental mitigation and management review is set out in Table 12-3.

Table 12-3 Summary of Chapter Review Against IEMA EIA Content Criteria: Assessment & Environmental Mitigation & Management

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Are the methods for establishing the ‘magnitude’ of effects on the receiving environment clearly defined? | Pass | None |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? | Pass | None |
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? | Pass | None |
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? | Pass | None |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? | Pass | None |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? | Pass | None |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? | Pass | None |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? | Pass | None |
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? | Pass | None |

13 Review of Chapter 12: Climate Change and Greenhouse Gases

Chapter 12 of Volume 1 of the ES Addendum comprises an updated version of the Climate Change and Greenhouse Gases ES chapter, taking into account the proposed development amendments.

13.1 Consultation

Responses have been received from the following consultees in relation to this ES chapter:

- Greater London Authority (GLA); and
- LB Camden Energy & Sustainability.

13.2 CBRE ES Review

In their review of the ES, CBRE awarded the Climate Change and Greenhouse Gases ES chapter a pass. They raised several clarifications, some of which were resolved through the submission of further information by Trium as set out in Table 13-1 below. Trium have proposed to resolve the remaining clarifications through the inclusion of additional information in the updated ES chapter, included in the ES Addendum.

Table 13-1 Summary of CBRE ES Review Clarification Requests for this ES chapter

| CBRE Clarification Request | Trium Response (July 2024) | CBRE Review of Response | Trium Response (November 2024) |
|--|---|--|--------------------------------|
| Part A Climate Change Resilience & Adaptation | | | |
| With regards to the ICCI assessment, no overarching methodology has been provided. Therefore, CBRE request that further clarity on the overarching ICCI assessment methodology is provided (with reference to the sensitivity and vulnerability of receptors). | The ICCI assessment utilises a qualitative approach as outlined within paragraph 12.5 of the ES chapter and paragraph 15 of the Climate Change Technical Note, included within ES Volume 3, Appendix: Climate Change and Greenhouse Gases – Annex 5. In line with the IEMA guidance and based on the approach, methodology and significance criteria relevant to the technical assessment, each technical specialist has considered the future climate scenario in respect of potential alterations to the following: <ul style="list-style-type: none"> • The sensitivity of identified receptors; • The magnitude of impacts; • The resultant effects; and • Any additional mitigation that might be required to address the future climate scenario. | In accordance with IEMA’s Climate Change Resilience Report, CBRE would expect to see consideration of susceptibility and vulnerability in relation to identified sensitive receptors. While this is not explicitly stated, it is assumed that this has been considered in relation to the future climate scenario. Therefore, no further information needed. | Clarification closed out |
| It is noted that the design would “minimise the exposure of future workers and visitors to health-related issues which could be | The health related issues which could be accentuated by climate include risks to human health, wellbeing and productivity from increased exposure | Clarification response noted. No further information needed. | Clarification closed out |

| CBRE Clarification Request | Trium Response (July 2024) | CBRE Review of Response | Trium Response (November 2024) |
|---|---|---|--|
| <p>accentuated by climate change”. It is not clear from this section which health-related issues or design measures are being referred to. CBRE have assumed that this relates to the risks set out in paragraph 12.49. However, this should be confirmed.</p> | <p>to heat in homes and other buildings. The design measures incorporated into the Proposed Development which will minimise these risks include, but not limited to:</p> <ul style="list-style-type: none"> • Methods to minimise internal heat generation, such as energy efficient lighting, insulation of heating and hot water pipework and energy efficient equipment with low heat output; • A high performance curtain wall façade to minimise the risk of summertime overheating; and • Passive ventilation measures and openable, solid panels to provide internal cooling. | | |
| <p>The assessment notes that people travelling via active modes would be sensitive to climate change. Table 12.1, sets out the sensitivity and vulnerability for the ICCI assessment in relation to transport receptors. However, the sensitivity noted in this table for certain receptors is lower than the sensitivity assigned to them in Chapter 7, i.e. pedestrians and cyclists are both high sensitivity in Chapter 7 but appear to be assigned as medium in Chapter 12. Further to this, after Table 12.1, there appears to be no consideration of how these changes in sensitivity would follow through the assessment, with respect to magnitude and scale and significance of effect.</p> | <p>The methodology for determining sensitivity in relation to the In-Combination Climate Change Impacts (ICCI) Assessment differs to that to the Traffic and Transport Assessment included within ES Volume 1, Chapter 7: Traffic and Transport. Pedestrians and cyclists are considered more sensitive to impacts considered within ES Volume 1, Chapter 7: Traffic and Transport, and have therefore been assigned ‘high’ sensitivity, compared to their sensitivity to climate change.</p> | <p>Clarification response regarding the different methodology noted. However, it is unclear how the different sensitivity relates to the wider assessment of effects, as the chapter confirms that the effects of the proposed development would not alter under the future climate (paragraph 12.16)</p> | <p>The sensitivity will be re-considered in the ES Addendum and justification provided for the sensitivity of receptors to climate change in ES Chapter 12: Climate Change and Greenhouse Gases.</p> |
| <p>Part B Greenhouse Gas Emissions Assessment</p> | | | |
| <p>No commentary is provided on which of the land use options have been considered in the assessment; therefore it is not possible to comment on whether the assessment provides a robust position. Clarification is therefore sought to understand which land use option has been assessed, and why that is considered appropriate.</p> | <p>A description of development which forms the basis of assessment is provided in paragraph 12.68 of the ES chapter. However, the assumption of land use is not relevant to this assessment and does not impact the results and conclusions presented.</p> | <p>The original clarification related to the various land use classes included as part of the Proposed Development (e.g. offices and lab workspace) and whether the predicted energy use was based on a robust, likely scenario for how the building would be used.</p> | <p>Clarification will be provided in the ES Addendum on the land use options and assumptions made for the Greenhouse Gas Assessment.</p> |
| <p>CBRE would expect that End Of Life Stage (Modules C1-4) emissions associated with these</p> | <p>The Whole Life Carbon Report submitted with the planning application confirms that the</p> | <p>Clarification response noted. No further information needed.</p> | <p>Clarification closed out</p> |

| CBRE Clarification Request | Trium Response (July 2024) | CBRE Review of Response | Trium Response (November 2024) |
|--|--|-------------------------|--------------------------------|
| pre-construction activities should be quantified in this assessment. | demolition and temporary works for the existing building on site have been considered in the results presented. The C1-C4 modules of the existing site have been considered within the A1 – A5 modules for the Proposed Development. As such, emissions associated with these pre-construction activities are considered within this assessment. | | |

13.3 Buro Happold ES Addendum Review

13.3.1 Baseline

Part A Climate Change Resilience & Adaptation

In their review of the original ES chapter, CBRE confirmed that the reporting of future climate projections was acceptable. This has remained unchanged in the updated ES chapter.

CBRE requested clarity regarding the approach to the assessment of sensitivity and vulnerability to climate change in the traffic and transport section of the ICCI assessment. CBRE’s clarification request is as follows:

“The assessment notes that people travelling via active modes would be sensitive to climate change. Table 12.1, sets out the sensitivity and vulnerability for the ICCI assessment in relation to transport receptors. However, the sensitivity noted in this table for certain receptors is lower than the sensitivity assigned to them in Chapter 7, i.e. pedestrians and cyclists are both high sensitivity in Chapter 7 but appear to be assigned as medium in Chapter 12. Further to this, after Table 12.1, there appears to be no consideration of how these changes in sensitivity would follow through the assessment, with respect to magnitude and scale and significance of effect.”

Trium’s response to this point in the updated ES chapter does not suitably clarify the approach. It is unclear what criteria have informed these sensitivity and vulnerability judgements (the sensitivity criteria in the traffic and transport chapter do not include any consideration of climate change) and it is also unclear how these judgements have been taken into account in regard to influencing the final significance of effect judgement on the receptors. Under good EIA practice, assessment methodologies should be transparent and repeatable. Due to the limited information provided, this is not the case with the current approach. It is requested that the Applicant provides further clarity on the ICCI methodology, including the climate change sensitivity and vulnerability criteria that have been used, and how these factors have been taken into account in the significance of effect judgements.

Part B Greenhouse Gas Emissions Assessment

In their review of the original ES chapter, CBRE confirmed their agreement with the baseline assessment reported in this section of the chapter, include the conservative assumptions that have been made in regard to current emissions from the application site. They also raised no concerns with the approach to receptor sensitivity and the assumptions and limitations of the assessment. These aspects remain unchanged in the updated ES chapter. Buro Happold consider this acceptable.

Overall

A summary of the findings of the baseline review is provided in Table 13-2.

Table 13-2 Summary of Chapter Review Against IEMA EIA Content Criteria: Baseline

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? | Pass | None |
| Is the 'sensitivity' of the baseline environment clearly evaluated? | Concerns | <p>Clarifications:</p> <ul style="list-style-type: none"> Trium's response to this point in the updated ES chapter does not suitably clarify the approach. It is unclear what criteria have informed these sensitivity and vulnerability judgements (the sensitivity criteria in the traffic and transport chapter do not include any consideration of climate change) and it is also unclear how these judgements have been taken into account in regard to influencing the final significance of effect judgement on the receptors. Under good EIA practice, assessment methodologies should be transparent and repeatable. Due to the limited information provided, this is not the case with the current approach. It is requested that the Applicant provides further clarity on the ICCI methodology, including the climate change sensitivity and vulnerability criteria that have been used, and how these factors have been taken into account in the significance of effect judgements. <p>Regulation 25 requests:</p> <ul style="list-style-type: none"> None |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? | Pass | None |

13.3.2 Assessment & Environmental Mitigation & Management

Part A Climate Change Resilience & Adaptation

In their review of the original ES chapter, CBRE requested clarity on the overarching ICCI assessment methodology:

“With regards to the ICCI assessment, no overarching methodology has been provided. Therefore, CBRE request that further clarity on the overarching ICCI assessment methodology is provided”

Sufficient clarity has not been provided in the updated ES chapter. It is requested that the Applicant provides further clarity on the ICCI methodology, including the climate change sensitivity and vulnerability criteria that have been used, and how these factors have been taken into account in the significance of effect judgements.

CBRE also raised a clarification request in regard to the socio-economics section of the ICCI assessment; however, this was subsequently resolved through the submission of further information by Trium in July 2023. They also raised a

comment on the lack of clarity regarding how mitigation measures would be secured; however this was also resolved via subsequent discussions with Trium.

CBRE did not raise any other concerns with the assessment reported in Part A of the chapter. These aspects of the chapter have remained broadly unchanged in the updated version.

Part B Greenhouse Gas Emissions Assessment

In their review of the original ES chapter, CBRE confirmed their agreement with the assessment methodology used in Part B of the chapter, including the approach to the assessment of effect significance. The methodology has remained broadly unchanged in the updated version of the chapter. Buro Happold consider this acceptable.

However, CBRE highlighting the limited information provided in regard to how the emissions have been quantified, particularly noting uncertainty as to what land use scenarios have been assessed and how robust they are. Further clarity has been provided in this regard in the updated chapter, confirming that a conservative scenario has been used. This is considered acceptable.

CBRE raised one other clarification request regarding the consideration of emissions associated with the deconstruction of the current building on site. Trium confirmed in subsequent correspondence that this has been taken into account in the construction stage assessment (Modules A1 – A5). This is considered acceptable.

Whilst CBRE had some other comments on this part of the chapter, they were generally accepting of the approach and awarded a pass, with no clarification requests. Whilst the GHG emission calculations have been updated to take account of the scheme amendments, much of the reporting of emissions and the effect significance results has remained broadly unchanged. Changes such as the new opening year have been taken into account. Buro Happold note that it appears that some errors were made in the GHG emissions summary table (Table 12.8) in the original chapter (e.g. regarding the end of life stage emissions); however these errors appear to have been corrected in the updated chapter. This is considered acceptable.

The GLA and LB Camden Energy & Sustainability have provided comments on documents that have informed the updated Climate Change and GHG Emissions ES chapter but have not directly commented on the chapter itself. Provided the comments do not necessitate any further changes to the proposed development that would require updates to the ES chapter, this section of the updated chapter is considered acceptable.

Overall

A summary of the assessment and environmental mitigation and management review is set out in Table 13-3.

Table 13-3 Summary of Chapter Review Against IEMA EIA Content Criteria: Assessment & Environmental Mitigation & Management

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined? | Concerns | Clarifications: <ul style="list-style-type: none"> Sufficient clarity has not been provided in the updated ES chapter. It is requested that the Applicant provides further clarity on the ICCI methodology, including the climate change sensitivity and vulnerability criteria that have been used, and how these factors have been taken into account in the significance of effect judgements. Regulation 25 requests: |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? | | |
| | | None |

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|----------------------|--|
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? | Pass | None |
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? | Pass | None |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? | Pass | None |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? | Pass | None |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? | Pass | None |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? | Pass | None |
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? | Pass | None |

14 Review of Volume 2: Townscape Visual and Built Heritage Assessment

Volume 2 of the ES Addendum comprises an updated version of the Townscape Visual and Built Heritage Assessment, taking into account the proposed development amendments.

14.1 Consultation

Responses have been received from the following consultees in relation to this ES volume:

- Greater London Authority (GLA);
- Historic England;
- Regent’s Park Conservation Area Advisory Committee; and
- Royal Parks.

14.2 CBRE ES Review

In their review of the ES, CBRE awarded the Townscape Visual and Built Heritage Assessment ES volume a ‘Concern/Fail’ grade. They raised several clarifications and potential Regulation 25 requests, some of which were resolved through the submission of further information by Trium as set out in Table 14-1 below. Trium have proposed to resolve the remaining clarifications through the inclusion of additional information in the updated ES volume, included within the ES Addendum.

Table 14-1 Summary of CBRE ES Review Clarification Requests for this ES volume

| CBRE Clarification Request | Trium Response (July 2024) | CBRE Review of Response | Trium Response (November 2024) |
|--|--|---|--|
| Clarifications | | | |
| There does not appear to be a clear section setting out any assumptions or limitations that exist with the baseline information presented. The Applicant should confirm what, if any, assumptions / limitations exist. | The relevant assumptions and limitation of the Townscape, Visual and Built Heritage Assessment (TVIHA) are as follows: <ul style="list-style-type: none"> • The assessment of effects is informed by relevant policy and guidance and also by professional judgement. Judgements on the scale and nature of effects, while they follow the clear process of sub-assessments set out in the ‘Assessment Methodology’ section, are always subjective to an extent, as acknowledged in the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) in respect of townscape and visual effects (paragraphs 2.23 – 2.25). The assessment narratives in this volume have been set out as clearly and transparently as possible with descriptions of the factors and judgements that have informed the assessment; | Clarification raised related to the baseline conditions of the site and surrounding area. The response largely focuses on the assessment. | To be provided in updated assessment in the ES Addendum. |

| CBRE Clarification Request | Trium Response (July 2024) | CBRE Review of Response | Trium Response (November 2024) |
|--|--|--|---|
| | <ul style="list-style-type: none"> The cumulative assessment is an assessment of the likely effects of the Proposed Development in the context of the cumulative schemes. It assumes that all cumulative schemes are of high quality because they have been approved or submitted following a period of design development in consultation with LBC officers (or the relevant LPA officers where cumulative schemes are located outside of the LBC); and The identification of relevant heritage assets and their heritage interest is based on publicly available records maintained by Historic England and the LBC, and it has been assumed that the information contained in these records is accurate. | | |
| Potential Regulation 25 requests | | | |
| <p>Minimal consideration is given to the effects of the deconstruction and construction stage. Paragraph 6.6 states that “there would be no effects on the heritage significance or appreciation of heritage significance of the heritage assets as a result of the deconstruction and construction process”. No justification is provided as to why this is considered to be the case. Paragraphs 6.7 and 6.8 set out the outcome of the townscape character and views assessments for the deconstruction and construction stage respectively, however as noted above, no reasoning is given to the evaluation of the effect and why that scale of effect / significance has been determined. Given the length of the construction period, this is considered to be inadequate and therefore, it is requested that the Applicant provide further evidence of this assessment.</p> | <p>The rationale for the assessment of deconstruction and construction effects is set out in Section 6, and particularly in paragraph 6.4. This includes explanation of the evaluation of effect as follows:</p> <p>“The likely scale and nature of effects identified as part of this assessment represent a precautionary worst-case based on the maximum potential effect on each receptor across the deconstruction and construction process as a whole, including the assumption that under-construction buildings have the same magnitude of impact as that of the finished buildings. The appearance of under-construction buildings is taken to be without full external cladding, and therefore generally adverse in nature.”</p> <p>In respect of heritage assets, while under construction, the Proposed Development would not enhance the ability to appreciate the significance of any heritage assets, it is also considered that this commonplace and temporary situation would not detract from the appreciation of any heritage assets. This is particularly the case as there is already an existing building on site of an equivalent size to that of the under-construction Proposed Development at full massing. It is therefore assessed that there would be no effect on the significance or appreciation of the significance of the identified heritage assets.</p> <p>In respect of townscape and visual effects, the scale and nature of effect is set out for each Townscape Character Area in paragraph 6.7 and for each view in paragraph 6.8. This is considered</p> | <p>It is recommended that additional justification and explanation of the assessment of deconstruction and construction effects, particularly in relation to the heritage, is included in the forthcoming environmental assessment accompanying the updates to the Proposed Development.</p> <p>Additionally, the text should consider deconstruction and construction noise, and the additional presence of construction vehicles, and where this could affect the setting of any of the heritage assets.</p> | <p>To be provided in updated assessment in the ES Addendum.</p> |

| CBRE Clarification Request | Trium Response (July 2024) | CBRE Review of Response | Trium Response (November 2024) |
|---|--|---|--|
| | a proportionate assessment for deconstruction and construction effects. | | |
| <p>Additional verified views have also been requested in the consultation response from the Royal Parks. These views have been requested to "assess if the Tower will be visible from Greenwich Park, including the view from One Tree Hill". They also note that it would be useful for nighttime views to be provided from all three Parks, namely Regent's Park, Kensington Gardens and Greenwich Park. Additional assessment from these viewpoints should be considered by the Applicant.</p> | <p>The additional viewpoints requested by the Royal Parks will be considered as part of the additional information to be submitted to the LBC by the Applicant.</p> <p>Regarding nighttime views, having reviewed the opening times for Regent's Park, Kensington Gardens and Greenwich Park, it was concluded that these would not be necessary for the assessment, given that all these parks close at dusk.</p> | <p>No comment can be provided until views and associated assessment is provided. Outcome remains as 'Concerns/Fail'</p> | <p>To be provided in updated assessment in the ES Addendum</p> |
| <p>For the townscape assessment, the assessment of the completed development stage effects on townscape is set out in Chapter 6 and specifically, Table 6.2. The table provides a clear description of the magnitude of impact, making reference to relevant views to aid the reader, and the scale and nature of effect. The table approach allows the reader to easily follow the application of the assessment criteria relating to the sensitivity, magnitude and effect scale. However, no assessment of the proposed development alongside cumulative schemes appears to have been provided in relation to townscape. It appears to CBRE that only the Network Building would be of particular relevance to this assessment, however paragraph 3.30 references the full list of cumulative schemes as "the cumulative schemes relevant to this assessment". The Applicant should provide the cumulative assessment relating to townscape, otherwise provide justification as to why this is not needed.</p> | <p>The cumulative assessment for the townscape assessment is provided at the end of Section 6 of the TVIHA, within paragraph 6.101. As noted by CBRE, it is only the Network Building that is considered relevant to townscape cumulative assessment, and it is assessed that it does not result in any change to the effect of the Proposed Development in the cumulative scenario in respect of the Townscape Character Areas.</p> | <p>Clarification response noted. No further information needed.</p> | <p>Clarification closed out</p> |

14.3 Buro Happold ES Addendum Review

14.3.1 Baseline

In their review of the original ES volume, CBRE confirmed that the reporting of the baseline conditions was acceptable, as was the approach to the consideration of receptor sensitivity. There have been no changes to the receptor sensitivity methodology or sensitivity judgments in the updated volume and the changes to the baseline descriptions are extremely minor. Buro Happold considers this acceptable.

CBRE requested clarification as to whether any assumptions or limitations have affected the baseline assessment. A new assumptions and limitations section has been included in Section 3 of the updated volume, which includes consideration of factors relevant to the baseline assessment. Buro Happold considers this acceptable.

A summary of the findings of the baseline review is provided in Table 14-2.

Table 14-2 Summary of Volume Review Against IEMA EIA Content Criteria: Baseline

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|---|----------------------|--|
| Does the ES describe the condition of those aspects of the environment that are likely to be significantly affected by the development? | Pass | None |
| Is the 'sensitivity' of the baseline environment clearly evaluated? | Pass | None |
| Where limitations in the baseline information exist, which could influence the assessment findings, are they easily identifiable? | Pass | None |

14.3.2 Assessment & Environmental Mitigation & Management

In their review of the original ES chapter, CBRE confirmed the assessment methodology, including the approach to the assessment of impact magnitude and effect significance, was acceptable. These aspects have remain unchanged in the updated ES volume.

CBRE raised a potential Regulation 25 request in relation to the assessment of the deconstruction and construction stage:

"Minimal consideration is given to the effects of the deconstruction and construction stage. Paragraph 6.6 states that "there would be no effects on the heritage significance or appreciation of heritage significance of the heritage assets as a result of the deconstruction and construction process". No justification is provided as to why this is considered to be the case. Paragraphs 6.7 and 6.8 set out the outcome of the townscape character and views assessments for the deconstruction and construction stage respectively, however as noted above, no reasoning is given to the evaluation of the effect and why that scale of effect / significance has been determined. Given the length of the construction period, this is considered to be inadequate and therefore, it is requested that the Applicant provide further evidence of this assessment."

Trium submitted further justification in July 2024 but CBRE subsequently responded requesting additional justification be provided in the updated ES volume. They specifically requested that the text *"should consider deconstruction and construction noise, and the additional presence of construction vehicles, and where this could affect the setting of any of the heritage assets."*

More detailed consideration has been given to the deconstruction and construction stage assessment of the amended proposals in the updated ES volume, including consideration of the effects of construction noise and construction

vehicle movements, as well as more justification for the potential effects on heritage assets in Section 6. A full list of receptor sensitivity, impact magnitude and effect significance results on a receptor-by-receptor basis is also provided in Appendix E at the rear of the volume. The appendix is incorrectly referenced as Appendix H in Section 6, which is not helpful to readers, but given that it has been provided in the submission, no further information needs to be requested from the Applicant.

CBRE noted a number of the consultee comments in their review of the original ES volume related to the visualisations included in the document. The Regent's Park Conservation Area Advisory Committee (RPCAAC) requested two further views from within the conservation area. They also advised that the colour of the proposed development would markedly worsen the harm caused by the building, this is contrary to the findings of the NPPF assessment reported in the original ES volume. Additional verified views were also requested in the consultation response from the Royal Parks to "assess if the Tower will be visible from Greenwich Park, including the view from One Tree Hill". They also noted that it would be useful for nighttime views to be provided from all three Parks, namely Regent's Park, Kensington Gardens and Greenwich Park. In their review of the ES, CBRE advised that additional assessment from these viewpoints should be considered by the Applicant.

In response to the consultee comments on the original ES volume, various changes have been made to the visualisations in the updated ES volume, including an increase in the number of supplementary verified views provided in Appendix A from 24 to 29. As stated in 3.45 of the updated volume, "verified wireline Views 8 and 9 have been replaced with renders at the request of LBC officers. In Appendix A, View A8 is modelled in render rather than wireline at the request of GLA officers, Views A25 – A29 are new verified renders from Tottenham Court Road requested by LBC officers and from Regent's Park by the RPCAAC. In Appendix B, View B25 is a new non-verified wireline from the Greenwich Park One Tree Hill view point requested by The Royal Parks."

The request by The Royal Parks for nighttime views from Kensington Gardens, Greenwich Park and Regent's Park has not been carried out "since access to all of these parks closes at dusk. As such there is no public viewing potential from within these spaces after dark." It is stated that this was included by Gerald Eve in the post-submission Consultation Response to The Royal Parks, no response was received on this topic.

In their consultation responses to the ES Addendum, the GLA, RPCAAC, and Royal Parks have not requested any additional views.

In their review of the original ES volume, CBRE also raised a potential Regulation 25 request regarding the inter-development cumulative effects assessment. However additional justification was provided in Trium in July 2023 and CBRE subsequently confirmed that the clarification was sufficient.

CBRE confirmed they broadly accepted the other aspects of the assessment and reporting of the results in the original ES volume. The scope and format of the ES volume remains consistent with the previous version, in regard to these aspects, with a number of changes made throughout the document to account of the amended scheme design. The text that has been amended is provided in blue (in contrast to the previous black text), which helps the reader easily identify the changes. Despite the various amendments, the significance of effect results have remained unchanged. Buro Happold consider these updates acceptable.

In their consultation responses to the ES Addendum, both Historic England and the GLA are generally supportive of the design changes and do not have any objection to the scheme or the assessment approach. RPCAAC, and Royal Parks continue to raise concerns with the impacts of the amended proposed development.

A summary of the assessment and environmental mitigation and management review is set out in Table 14-3.

Table 14-3 Summary of Volume Review Against IEMA EIA Content Criteria: Assessment & Environmental Mitigation & Management

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|--|-----------------------------|---|
| Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined? | Pass | None |
| Where the ES sets out a generic method for evaluating significance, is this applied throughout the ES? Where an over-arching approach is not followed are the specific methods used to evaluate significance for each environmental topic clearly justified? | Pass | None |
| Does the evaluation of significance consider the different stages of development (construction, operation) and relate the effects identified to the condition of the baseline environment? | Pass | None |
| Does the ES give appropriate prominence to both positive and negative effects relative to their significance? | Pass | None |
| Does the ES identify the significance of effects that are anticipated to remain following the successful implementation of any mitigation described in the ES? | Pass | None |
| Is it clear that the EIA has considered inter-relationships in order to identify secondary, cumulative and synergistic effects? | Pass | None |
| Does the ES describe the measures proposed to be implemented to avoid, reduce, or offset significant adverse effects of the proposed development? | Pass | None |
| Is an attempt to indicate the effectiveness of the influence of the stated mitigation measures on the significance of the environmental effects provided? | Pass | None |
| Does the ES set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies? | Pass | None |

15 Review of Chapter 13: Summary and Conclusions

Chapter 13 of Volume 1 of the ES Addendum sets out the summary and conclusions of the ES Addendum, taking into account the proposed development amendments. It includes updates to Chapter 14 Likely Significant Effects and Conclusions and Chapter 15 Environmental Management, Mitigation and Monitoring Schedule in the original ES.

15.1 Consultation

No consultation responses have been received in relation to this ES Addendum chapter.

15.2 CBRE ES Review

In their review of the ES, CBRE raised one clarification request in regard to Chapter 15, which was subsequently resolved through submission of further information by Trium (letter dated 25 July 2024), and confirmed as acceptable by CBRE in their updated ES Review (September 2024), as set out in Table 15-1 below.

Table 15-1 Summary of CBRE ES Review Clarification Requests for this ES chapter

| CBRE Clarification Request | Trium Response | CBRE Review of Response |
|--|--|---|
| <p>For the majority of measures, how that measure would be implemented is identified within Table (e.g. appropriately worded planning condition), however this is not the case for all rows. The Applicant should provide clarification for the way in which each measures would be implemented.</p> | <p>Table 15.1 lists the Management Plans / Documents which have been prepared in draft to accompany the planning application or are committed to being prepared and implemented. These Management Plans / Documents will be secured through obtaining planning permission for the Proposed Development and their drafting, agreement and implementation will be subject to appropriately worded planning conditions attached to the planning permission. The additional environmental mitigation, design commitments and monitoring outlined in Table 15.2 are measures that the LBC will need to secure for the project, either via appropriately worded planning conditions (related to the planning permission) or through the planning obligations to be secured by the Section 106 Agreement.</p> | <p>Clarification response noted. It is therefore assumed that the following will be secured through planning conditions attached to any future permission:</p> <ul style="list-style-type: none"> • A detailed Unexploded Ordnance Risk Assessment; • Written Scheme of Investigation (WSI) • Construction Management Plan, and associated documents listed in Table 15.1 of Chapter 15; • Ground Movement Monitoring during deconstruction of the existing building; • Vegetation clearance outside of nesting bird season, or site checks by suitably qualified ecologist; • Car Parking Design and Management Plan; • Operational Waste Management Plan; • Ecological Management Plan; and • Further wind mitigation testing. |

15.3 Buro Happold ES Addendum Review

As set out above, the one clarification requested by CBRE in relation to Chapter 13 to 15 in the original ES main volume, was subsequently resolved. CBRE raised no other concerns regarding these chapters. The small number of changes to the effect significance results and mitigation across the updated ES chapters are clearly set out in Chapter 13 of the ES Addendum. The effects interactions are not expected to change as the effect significance changes would not influence the effects that could result in effect interactions. Buro Happold confirm the chapter is acceptable.

Provided in Table 15-2 is a summary of the required clarifications and Regulation 25 requests in relation to this chapter.

Table 15-2 Summary of Review of ES Addendum Chapter 13: Summary and Conclusions

| Criteria | Buro Happold Finding | Summary of Clarifications / Regulation 25 Requests |
|------------------------|----------------------|--|
| ES Addendum Chapter 13 | Pass | None |

16 Summary & Conclusions

Buro Happold has been commissioned by LB Camden to provide independent EIA advice, in relation to the proposed redevelopment of Euston Tower, located at 286 Euston Road, London, NW1 3DP (the 'application site'), in the London Borough of Camden.

The tables in Chapters 3 to 15 of this ES Addendum Review provide a summary of the outcome of the review. The results range from 'Pass' to 'Concerns'. Where concerns are noted, this indicates that clarifications have been requested in relation to this criterion. The Applicant is expected to submit additional information in response to these requests. No Regulation 25 requests have been made.

Upon review, should the additional information be considered sufficient then a pass will be awarded. If, however, the additional information is not sufficient, CBRE may either request additional clarifications or additional information in accordance with a Regulation 25 request.

Appendix A Consultee Comments



Brent

BRENT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – NO OBJECTION

Application No: 25/0047

To: London Borough of Camden
Regeneration and Planning Development Management
Town Hall
Judd Street
WC1H 9JE

I refer to your consultation letter dated 07/01/2025 regarding:

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

Proposal: 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.

Reference: 2023/5204/P

The London Borough of Brent, the Local Planning Authority, have considered the proposal and have NO OBJECTION.

Date: 03/02/2025

Signature:

David Glover
Head of Planning and Development Services

nObsRnoD

INFORMATIVES

From: Location Enquiries

Sent: 23 January 2025 18:49

To: David Fowler; Planning

Subject: RE: Consultee letter for Planning Application: 2023/5240/P

Good afternoon,

Application: 2023/5240/P

Address:

Euston Tower

286 Euston Road

London

NW1 3DP

The Proposed Work:

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.

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be

demonstrated to the satisfaction of TfL Infrastructure Protection engineers that:

- our right of support is not compromised;
- the development will not have any detrimental effect on our structures either in the short or long term;
- the design must be such that the loading imposed on our structures is not increased or removed;
- we offer no right of support to the development or land.

Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.

1. Before the pre-commencement/demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) provide an overview of the overall development including both design on temporary and permanent works;
- b) provide demolition details;
- c) accommodate the location of the existing London Underground structures and roads;
- d) accommodate ground movement arising from the development construction thereof;
- e) mitigate the effects of noise and vibration arising from the adjoining railway operations and roads;
- f) provide details on the use of tall plant/scaffolding for the demolition phase;

- g) No claims to be made against TfL or London Underground by the Local Authority, purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.

2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) provide detailed design for foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent);
- b) site specific Risk Assessments and Method Statements (RAMS) for any activities (basement excavation, groundworks, piling) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.

3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) provide detailed design for all superstructure works (temporary and permanent);
- b) site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering

Transport for London

7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



Mitigating risk - while helping London develop.

| | |
|----------------------------|---|
| To: | David Fowler, Deputy Team Leader |
| Author: | Joze Stivan, Senior Transport Planner |
| Reviewer(s): | Steve Cardno, Lead Principal Transport Planner Brenda Busingye, Transport and Travel Planning Team Manager Sam Margolis, Head of Transport Strategy and Projects |
| Date: | 19/03/2024 |
| Address: | Euston Tower 286 Euston Road London NW1 3DP |
| The Proposed Work: | Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work. |
| Planning Reference: | 2023/5240/P |
| Key points: | Acceptable from a transport point of view subject to conditions and various planning obligations being secured via legal agreement. |

Thank you for consulting Transport Planning, our considerations are covered below:

- Policy review
- Site location and access to public transport
- Trip generation
- Travel planning
- Access and permeability
- Public realm
- Cycle parking
- Car parking and vehicle access
- Construction management
- Deliveries and servicing
- Transport Assessment
- Highway works
- Pedestrian, Cycling and Environmental Improvements
- Micromobility Improvements

Policy review

Policy T1 of the Local Plan 2017 promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.

Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.

The Council is consulted on the [Draft new Local Plan](#) from Wednesday 17 January to Wednesday 13 March 2024. The document sets out our vision for future development in Camden for the next 15 years. The applicant is encouraged to explore the new planning policies which will start gaining weight in the coming months. Policy S1 – South Camden includes the support and delivery of several infrastructure schemes in this area, towards which the Council will seek the appropriate contributions. Pertinent to this development are:

- The delivery of High Speed 2 and station improvements at Euston.
- The transformation of Euston Road and the removal of the King's Cross Gyratory.
- The delivery of new and improved pedestrian and cycle links in accordance with the Council's Transport Strategy.
- The roll-out of the Council's neighbourhood-based Safe and Healthy Streets schemes across this area, delivering through-traffic reduction and other Healthy Streets measures.

[Camden's Transport Strategy](#) (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets our objectives, policies, and measures for achieving this goal.

Our priorities include:

- increasing walking and cycling
- improving public transport in the Borough
- reducing car ownership and use
- improving the quality of our air
- making our streets and transport networks safe, accessible, and inclusive for all.

In 2023 we reviewed our progress so far on the CTS and also set out our delivery plan for the period covering 2024/25. This was presented to [Culture and Environment Scrutiny Committee on 6th February 2024](#). The plan includes commitments, all of which are pertinent to this application, and which will be expanded upon in later sections, to:

- i. introduce a segregated cycle route in at least one direction, possibly two, along the length of Albany Street segregated cycle corridor (primary route), which form part of a borough wide '*Healthy Routes - strategic cycling corridors*' programme of works, and the southern extent of which falls within 500m of the proposed site;

- ii. deliver the wider [Regent's Park Area Safe & Healthy Streets](#) programme, for which extensive stakeholder engagement activities took place in 2023, the scheme area of which is in the immediate vicinity of the site;
- iii. implement Euston Road corridor and junction improvements, led by TfL with support from the Council, which form part of HS2 works and longer term Euston Healthy Streets vision and which directly borders the site,;
- iv. continue to expand our dockless bike and e-scooter hire network, including for locations in the immediate vicinity of the site, and
- v. to contribute in delivering the above schemes towards the implementation of the CTS Cycling, Walking & Accessibility, EVCP and Road Safety Action Plans.

Camden's [Clean Air Action Plan](#) and [Climate Action Plan](#) also contain policies which are relevant to our transport observations.

London Plan policies on transport of relevance include:

- Policy T1 (Strategic approach to transport)
- Policy T2 (Healthy Streets)
- Policy T3 (Transport capacity, connectivity, and safeguarding)
- Policy T4 (Assessing and mitigating transport impacts)
- Policy T5 (Cycling)
- Policy T6 (Car parking)
- Policy T7 (Deliveries, servicing, and construction)
- Policy T9 (Funding transport infrastructure through planning)

London Plan Policy T1 (Strategic approach to transport) states that Development Plans should support, and development proposals should facilitate, the delivery of the Mayor's strategic target of 95% per cent of all trips in central London to be made by foot, cycle, or public transport by 2041.

London Plan Policy T1 also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

We have developed a draft [Freight and Servicing Action Plan \(FSAP\)](#) to support safe, clean and efficient deliveries, freight and servicing operations in our borough. It will help us meet the objectives in the Camden Transport Strategy. The Plan is expected to be adopted in the Summer 2024.

The site sits within the [Knowledge Quarter area – King's Cross, St. Pancras, Euston, Bloomsbury](#). One of the four strategic priorities of [KQ2050](#) is '*to identify and support work that improves our local environment, creating a great place for people to live, work and visit*'. The strategy further states '*This strategic area requires us to identify, advocate for and support work to improve our local sustainable environment in partnership with local councils, TfL, GLA and other organisations*'. To support these strategic goals, we are developing improvement schemes on our highways network in this area, towards which will be seeking s106 contributions from this development.

Site location and access to public transport

The Site is bounded by Euston Road (A501) to the south, Hampstead Road (A400) to the east, Brock Street (pedestrians only) to the north, and Regent's Place (pedestrians only) to the west.

Tottenham Court Road (also A400) located approximately 50m south of the site, forms part of the Strategic Road Network (SRN). The Council is the highway authority for this road and is therefore responsible for its maintenance. However, Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.

Euston Road and Hampstead Road form part of TfL's Transport for London Road Network (TLRN).

The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent).

Warren Street, Euston Square and Great Portland Street (London Underground) stations are located approximately 160m south, 300m east and 340m west of the site, respectively. Euston Railway station is located approximately 550m to the east.

The closest bus stops are located on Hampstead Road next to the site and also on Euston Road outside Regent's Place.

The site is easily accessible from the Strategic Cycle Network, with Cycleway C27 located directly south of Euston Road in close proximity of the site.

The nearest Cycle Hire docking stations are located opposite the site on Hampstead Road and on Warren Street opposite Warren Street station. The Council is liaising with TfL to increase the provision of Cycle Hire docking station to improve accessibility to the site from the north.

Dedicated parking bays for dockless rental e-bikes and rental e-scooters are located on Drummond Street and Osnauburgh Street. However, these bays are already showing signs of overcapacity and increasing demand. The Council has plans to expand the network of bays in the area and it is hoped that additional bays could be provided in the future via developer contributions.

Immediately south of Euston Road, the proposed Fitzrovia Area Safe & Healthy Streets scheme will improve walking and cycling to the site.

Trip generation

The site has been vacant since 2021. The proposals will increase the existing floor area by 26,499 sqm (GIA) to provide 77,542 sqm (GIA) space for office, research and development, retail, café, restaurant and learning and community uses.

The TRICS database was used to derive the anticipated total person trip rates generated by the proposed new development. The applicant is requested to provide the full TRICS output.

The total morning and afternoon peak trip generation for the proposed development is presented in table 7.5 of the Transport Assessment (TA) and reproduced here:

Table 7-15: Total Development Trips by Mode

| Mode | AM Peak Hour (0800-0900) | | | PM Peak hour (1700-1800) | | |
|----------------|--------------------------|------------|-------------|--------------------------|-------------|-------------|
| | In | Out | Total | In | Out | Total |
| Pedestrians | 121 | 10 | 131 | 8 | 113 | 121 |
| Cyclists | 175 | 15 | 190 | 11 | 163 | 174 |
| Bus | 188 | 16 | 204 | 12 | 175 | 187 |
| Underground | 710 | 59 | 769 | 44 | 661 | 705 |
| Rail | 576 | 48 | 624 | 36 | 536 | 572 |
| Car drivers | 0 | 0 | 0 | 0 | 0 | 0 |
| Car passengers | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 1770 | 148 | 1918 | 111 | 1648 | 1759 |

The analysis shows that the proposal will result in a significant increase in person trips, the majority of which are projected to be taken by public transport and active travel. Given the fact that the site has been vacant since 2021, it is appropriate to consider the net impact based entirely on the proposed development, rather than in comparison to the permitted use.

Based on other developments in the area, it is anticipated that a high volume of the walking trips are likely to be made from Warren Street, Euston Square and Great Portland Street (London Underground) stations, the bus stops on Hampstead Road, Euston Road, and Tottenham Court Road, and also from rail stations at Euston, King’s Cross, and St Pancras.

Considering the significant increase in active travel to and from the site, the applicant will be requested to provide financial contributions towards the aforementioned pedestrian and cycle links, and Regent’s Park Area Safe and Healthy Streets schemes in the vicinity of the site.

An Active Travel Zone (ATZ) assessment included in the TA identifies five routes to key destinations. The analysis shows some opportunities to enhance the pedestrian and cyclist environment on Euston Road and improve local conditions to increase active travel. Euston Road forms part of the TLRN which is managed by TfL. The Council would support TfL in securing financial contributions towards active travel improvements on Euston Road, and also Hampstead Road.

Travel planning

An outline Travel Plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. The targets for active travel will be updated following the results of the initial travel survey. Modal share projections for walking and cycling will need to be in accordance with Camden’s Transport Strategy and the Mayor’s Transport Strategy.

A Travel Plan and associated monitoring and measures contribution of £11,348 will be secured by legal agreement if planning permission is granted.

Access and permeability

The west and north areas of the Euston Tower are pedestrianised, with Regent's Place Plaza, located to the west, consisting of a large pedestrianised square.

All pedestrian entrances will be provided at ground level. The office and laboratory entrances are located on Euston Road to the south side of the building. The community entrance to the public learning facility is accessed from the north and east of the site via Brock Street and Hampstead Road. The retail/restaurant uses will be located at Level 1 and accessed via Regent's Place Plaza or Hampstead Road.

A dedicated cycle access, proposed to the south-west of the site, provides access to the basement via a dedicated cycle ramp or lift.

The new public realm will provide active frontage, and pedestrian-prioritised and landscaped footways.

Public realm

Regent's Place Plaza, located to the west of Euston Tower, is a large pedestrianised square regularly used for exhibitions and events. The Plaza features large, planted seating platforms and low planting. At the intersection of Euston and Hampstead Roads, trees of various species and sizes are planted at grade with two formalized seating planters further north along Hampstead Road. Brock Street features a linear arrangement of plane trees planted in pits at grade, between which are a series of basement vents, wooden benches, and cycle stands.

The proposed development will provide active frontage, pedestrian-prioritised and landscaped footways, and new public realm. No stopping up of the public highway is required to implement the proposed development.

The landscaping proposals are designed to accommodate vehicle access to the development for the delivery of specialist gases associated with the proposed life science uses, and to allow cyclists to access to the entrance to the cycle store without compromising pedestrian flows along Euston Road (further detail is provided in the Cycle parking section).

In line with the Healthy Streets approach, the public realm improvements will include footways resurfacing with paving, new planting, seating and secure cycle stands. The proposed footway widths range from 2.1m to 7.1m, which is in accordance with the guidance set out in Manual for Streets.

Cycle parking

The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for:

- A1 use (food retail)
 - first 1000 sqm 1 space per 175 sqm, thereafter 1 space per 1000 sqm (GEA) long stay,

- first 750 sqm 1 space per 20 sqm, thereafter 1 space per 150 sqm (GEA) short stay.
- B1 use (business offices)
 - 1 space per 75 sqm (GEA) long stay,
 - first 5,000 sqm 1 space per 500 sqm, thereafter 1 space per 5,000 sqm (GEA) short stay.
- B1 use (light industry and research and development)
 - 1 space per 250 sqm (GEA) long stay,
 - 1 space per 1000 sqm (GEA) short stay.
- D2 use (public)
 - 1 space per 8 FTE staff long stay,
 - 1 space per 100 sqm (GEA) short stay.

A dedicated entrance on Euston Road to the southwest of the proposed development will provide cycle access to the basement using a shallow gradient (1:12) ramp and a dedicated cycle lift, both able to accommodate larger cycles. Further measures like mirrors or see-through balustrades will be explored to enhance visibility to other cyclists using the ramp. A proposed shared-use space was designed to a minimum width of 4.5m in line with the LCDS to minimise any potential conflict between cyclists accessing the site and pedestrians.

Cycle parking will be provided in line with the London Plan standards: 861 long stay and 89 short stay spaces. Long stay cycle parking is provided in the basement level, and consists of the previously agreed:

- 646 two-tier parking spaces (75%),
- 86 foldable bicycle parking spaces (10%),
- 86 spaces / 43 Sheffield stands (10%),
- 43 Enlarged Sheffield stands (5%).

Male and female changing rooms will also be provided, including 574 lockers and 72 showers.

The short-stay cycle parking spaces will be located within the public realm close to the building, with two enlarged spaces provided to the south of the dedicated cycle access ramp.

The cycle parking details will be secured by condition.

Car parking and vehicle access

The site is located in controlled parking zone CA-G Somers Town Area, which operates 08:30-18:30 Monday to Friday, with variable controlled hours on Saturdays and none on Sundays. At present, additional controls on Saturday for Residents Bays and Paid for Bays apply 08:30-13:30 to streets west of Eversholt Street only. However, in Autumn 2024, Saturday controls 8:30am - 1:30pm and single yellow lines will be implemented in the remainder of the CPZ, as a trial.

The development is proposed car-free, which would be secured by legal agreement if planning consent were granted. The existing 102 car parking spaces will be removed.

Two blue-badge parking spaces are proposed within the Euston Tower basement, accessed from the Drummond Street car park ramp. This provision complies with the London Plan standards. It is requested that both parking bays are equipped with active electric vehicle charging points. A Car Parking Design Management Plan was submitted in support of the application.

Officers expect the large majority of visitors to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Officers therefore suggest that an additional electric vehicle charging point (fast charger installed on an island buildout) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.

Servicing access will take place from Longford Street via the existing ramp.

Construction management

Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft Construction/Demolition Management Plan using the Council's CMP pro-forma is provided in support of the planning application. However, in absence of a principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly.

The site is located on the corner of Euston Road and Hampstead Road which form part of part of TfL's Transport for London Road Network (TLRN). Tottenham Court Road (A400) is located just to the south of the site, and forms part of the Strategic Road Network (SRN). Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network.

The contractor will be required to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.

More detailed DMP and CMP documents will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.

Implementation support contributions of £30,513 and impact bonds of £32,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.

A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by legal agreement if planning permission is granted.

Deliveries and servicing

A draft Delivery and Servicing Plan (DSP) was submitted with the application.

The existing servicing vehicle access from Longford Street to the servicing area in the basement will be retained, with Regent's Place Management continuing to manage all servicing arrangements. The basement servicing area will cater for office, life science and ancillary retail land uses.

The proposed development is projected to attract 91 daily servicing trips, with 14 vehicles in the peak hour. Servicing trips were calculated from delivery log data provided by the Regent's Place Management Team. It is confirmed that the Regent's Place Management data is comparable with the servicing trip generation obtained from TRICS.

The servicing area provides eight loading bays, shared between Euston Tower and Brock Street office building. There are two 10m loading bays, two 8m bays and four 6m bays. The loading bays are located at a lower level than the Euston Tower and Brock Street back-of-house accesses and platform lifts are used to transport goods and bins between the two levels. The swept paths analysis provided for a Rigid Vehicle and a 7.5t Panel Van accessing the 10m and 8m loading bays is considered acceptable. All vehicles will enter and exit the servicing area in a forward gear. The applicant is requested to equip four loading bays with EVCPs.

From the data received from Regent's Place Management, Brock Street buildings receive 15-16 deliveries per day. Servicing trip capacity assessment, which takes account of peak time deliveries, vehicle dwell time and loading bays capacity, shows that five loading bays are required in the peak hour for both the Proposed Development and the other buildings on Brock Street. It is therefore considered that the proposed eight loading bays provide sufficient capacity to accommodate the servicing demand generated by the proposed development.

Once vehicles have accessed a loading bay, the driver will unload the goods, and the management team will take receipt of the delivery and transfer it to either the parcel/post room or to its intended destination in the building. Some deliveries may

need to be received by their recipient directly, like laboratory samples; in these circumstances, the recipients will come to the loading bay to collect their delivery.

Two cargo bike parking bays will be also provided, with deliveries received by a member of on-site staff. It is welcomed to see that the DSP encourages the use of the cargo bikes. It is suggested that this activity is monitored to provide further cycle parking should demand arise in the future.

The draft DSP expresses a desire for exploring the use of consolidation centres. It is requested that the applicant commits to freight consolidation, in order to reduce the level of deliveries by 50%. The applicant should also refer to the aforementioned FSAP which details further measures to achieve efficient, safe, and clean deliveries and servicing.

The DSP also outlines the proposed specialist delivery arrangements for Life Science, and the next section is an extract from the plan. The vehicle swept paths are provided and appear acceptable.

'Dependent upon the tenants, additional specialist bottled/liquid gas deliveries along with the regular deliveries will be required. The liquid and bottled gas deliveries cannot take place within the basement and need to be at ground level with blue-sky above them. At this stage it is therefore proposed that a certain degree of flexibility is allowed to design for different volumes, types, and delivery methods of liquids/ gases.'

All specialist delivery activity is proposed to be at ground-level to the northwest corner of the building. The proposed specialist delivery location will enable deliveries to be made safely and directly into the ground-level gas store. The vehicle will access the delivery bay from Drummond Street via Triton Square and stop in an area close to the gas store. An area will be cordoned off to pedestrians between the proposed planter to the north and the building. An alternative pedestrian route is provided to the north of the planter.

All vehicle movements across the Regent's Place Plaza and the delivery process will be fully managed by trained staff with a 'banksman' provided to guide the vehicles across and manoeuvre within the plaza. It is proposed that gas deliveries will be scheduled to be undertaken outside of peak pedestrian times where less people will be within the plaza.

Once the servicing vehicle has arrived, the delivery can be transferred into the building. For liquid nitrogen (LN2) deliveries, LN2 may be pumped directly to an on-site tank via a hose. If a Dewar exchange solution is adopted, full and empty Dewars will be transferred between the building and the LN2 store. Gas bottles will be brought directly into the store from the delivery vehicle using trollies and directly to the gas store at ground level.

Specialist life science gas deliveries are projected at one to three deliveries per week, with a maximum of one delivery per day.'

A more detailed DSP will be secured by legal agreement if planning permission is granted. This will help to ensure that any operational impacts associated with delivery and servicing movements could be mitigated.

Highway works

The applicant would be financially responsible for any works relating to changes or repairs to the highway. Whilst it is expected that significant damage to the public highway is unlikely to be caused during demolition and construction, given the extent of the required works, it is suggested that a modest highways contribution of £30,000 be secured by legal agreement if planning permission is granted.

Pedestrian, cycling and environmental improvements

The Council is developing proposals which will transform the public realm and make many streets more attractive to pedestrians and cyclists in The Regent's Park estate area immediately surrounding the Euston Tower. To tackle the significant deprivation of this area, we have developed a project called the [Regent's Park Safe and Healthy Streets Scheme](#). An extensive stakeholder consultation in 2023 confirmed the most frequently raised issues around high traffic speeds, poor pedestrian crossings, traffic congestion and rat running, and inadequate pavement surface, width, and accessibility. The most frequent suggestions for changes focused on reduction in traffic volumes, new / safer crossings, and creating safer pedestrian routes, more seating, greenery, artwork and improved cleanliness, and more cycling infrastructure. We are now in the process of identifying and developing the Healthy Streets Projects on key hotspots: Augustus Street, Albany Street, Cumberland Market, Hampstead Road, Robert Street and William Road. These infrastructure improvements schemes will directly benefit the local community and the proposed development.

In line with the anticipated increase in cycle and walking trips generated by the development and further promoted by the Travel Plan, we will seek a contribution of £1,600,000 towards public realm improvement schemes to enhance the pedestrian and cycling environment in the vicinity of the site. This will include:

- contributing towards the delivery of the wider Regent's Park Area Safe & Healthy Streets programme,
- introducing a segregated cycle route in at least one direction, possibly two, along the length of Albany Street segregated cycle corridor (primary route), which form part of a borough wide '*Healthy Routes - strategic cycling corridors*' programme of works,
- Fitzrovia Area Safe & Healthy Streets scheme.
- Highway improvement schemes developed to meet the strategic priorities of the Knowledge Quarter.

Micromobility improvements

Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area. The Council has commissioned a project to identify Shared Transport Access Level (STAL) which mirrors a PTAL rating, however it only includes shared transport modes. The analysis shows STAL grades vary from 2 to 6A throughout the site, which indicates opportunities for improvement. Officers anticipate significant demand for more parking bays to be provided in the area should planning permission be granted. A micromobility improvements contribution of £10,000 would

therefore be secured as a Section 106 planning obligation if planning permission is granted. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

Conclusion

The proposal is acceptable in terms of transport implications subject to the following conditions and planning obligations being secured by legal agreement:

- Travel Plan and associated monitoring and measures contribution of £11,348.
- Car-free development.
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- Construction Management Plan (CMP), CMP implementation support contribution of £30,513, and CMP Impact Bond of £32,000.
- Requirement to form a construction working group consisting of representatives from the local community.
- Delivery and Servicing Plan.
- Highway works contribution of £30,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £1,600,000.
- Micromobility improvements contribution of £10,000.

Document checking and sign off

Author: Joze Stivan
Position: Senior Transport Planner
Team: Transport Planning and Programmes



Signed:

Dated: 12/03/2024

Checked by: Steve Cardno
Position: Lead Principal Transport Planner
Team: Transport Planning and Programmes



Signed:

Dated: 12/03/2024

Checked by: Brenda Busingye
Position: Transport and Travel Planning Team Manager
Team: Transport and Travel Planning

Signed:

Dated: 19/03/2024

Approved by:

Sam Margolis

Position:

Head of Transport Strategy and Projects

Team:

Transport Strategy and Projects

Signed:

A handwritten signature in black ink, appearing to read "Sam Margolis". The signature is written in a cursive, slightly slanted style.

Dated: 20/03/2024



**ENVIRONMENTAL HEALTH
SUPPORTING COMMUNITIES**

| | |
|--------------------|---|
| To: | <i>David Fowler</i> , Planning Officer, Development Management, 5 Pancras Square |
| From: | <i>Edward Davis</i> (Environmental Health Officer) |
| Date: | 16 February 2024 |
| Re: | <i>Euston Tower 286 Euston Road London NW1 3DP</i> |
| Proposal: | <i>Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work.</i> |
| Reference: | <i>Planning application ref. 2023/5240/P</i> |
| Key Points: | The proposals are acceptable in environmental health terms |

ENVIRONMENTAL HEALTH OBSERVATIONS

A noise assessment has been submitted by the applicant for a site on Euston Road.

The proposals are for redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces

Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, BS 4142:2014 “Methods for rating and assessing industrial and commercial sound” but the applicant has slightly misinterpreted the Camden Council’s Local Plan, version June 2017.

The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.

The assessment indicates that the proposed plant should be capable of achieving the proposed environmental noise criteria at the nearest and potentially most affected noise sensitive receptors.

I am satisfied that the submitted acoustic submission meets our local plan guidelines and therefore acceptable in environmental health terms. I offer no objections to the application and suggest the following should you be mindful to grant the application.

Suggested conditions:

The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS 4142:2014 "Methods for rating and assessing industrial and commercial sound" at the nearest and/or most affected noise sensitive premises, with installation operating at maximum capacity and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017

Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017

Emergency generator:

Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24 hour LA90, 15 mins) by more than 10dB one metre outside any premises.

The emergency plant and generators hereby permitted may be operated only for essential testing, except when required by an emergency loss of power.

Testing of emergency plant and generators hereby permitted may be carried out only for up to one hour in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with

the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017

Construction noise:

Construction and demolition works and associated activities at the development, audible beyond the boundary of the site should not be carried out other than between the hours of 07:00 – 18:00 Monday to Friday daily, 08:00 – 13:00 on Saturdays and at no other times, including Sundays and Public/Bank Holidays, unless otherwise agreed with the Environmental Health Officer.

At least 21 days prior to the commencement of any site works, all occupiers surrounding the site should be notified in writing of the nature and duration of works to be undertaken. The name and contact details of a person responsible for the site works should be made available for enquiries and complaints for the entire duration of the works and updates of work should be provided regularly. Any complaints should be properly addressed as quickly as possible.

Best Practicable Means (BPM) should be used, including low vibration methods and silenced equipment and machinery, in accordance with the Approved Codes of Practice of BS5228:2009 for noise and vibration control on construction and open sites.

The following noise and vibration limits are to be set as monitoring limits

| Day | Relevant Time Period (hrs) | Averaging Time, T | *Threshold Level for Construction Noise (dB _{LAeq, T}) |
|------------------|----------------------------|-------------------|--|
| Monday to Friday | 07.00 to 08.00 | 1 hr | 70 |
| Saturday | 07.00 to 08.00 | 1 hr | 70 |
| | 08.00 to 13.00 | 5 hr | 75 |

- All units are expressed as “A” weighted decibels ((dB(A)).
- L_{Aeq} shall be defined as BS 5228, Part 1.
- The noise limits set in 7.0 above are the maximum values when measured one metre from the facade of the nearest dwelling.
- Exceptionally consent for work outside the hours specified in 7.0 may be given after necessary consultation. The procedure for obtaining consent for out of hours working is specified under the dispensation procedures in this Schedule.

The following vibration limits are prescribed to control levels of ground vibration arising from the works:

| Type of Activity | Limit (mm/sec PPV) |
|--|----------------------------|
| Activities causing continuous vibration not exceeding a total of half an hour over the working day | 1.0 (Residential Premises) |
| | 3.0 (Commercial Premises) |
| Activities causing continuous vibration exceeding a total of half an hour over the working day | 1.0 (All Premises) |

Regards

Edward Davis
Pollution Planning Officer
Supporting Communities
London Borough of Camden
Telephone: 02079745550/ Mobile: 07967 652382



David Fowler
Regeneration and Planning
London Borough of **Camden** 2nd Floor,
5 Pancras Square

Design Out Crime Office
North West DOCO Office,
Ruislip Police Station,
The Oaks,
Ruislip,
HA4 7LE
Telephone: 0208 7333703
Email:
DOCOMailbox.NW@met.pnn.police.uk
www.met.police.uk
Your ref: 2023/5240/P
Our ref: NW 7547
(24/01/2025)

Good morning,

Thank you for allowing me to comment on the **Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and 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.**

I have had previous meetings with the architects in relation to this proposed development.

The site falls within the policing ward of Regents Park. The top reported crimes for this ward for the month of November 2024 (taken from the police UK website) are theft from the person, violence and sexual offences, antisocial behaviour and other theft. Other crimes of note within this area are public order, criminal damage, robbery and drugs.

I have had previous meetings in regards to this development from the architect.

Please refer to Appendix A for illustration of crime figures and local as well as national planning policy

I do not object to the proposal but also have the following comments and recommendations:

There are several concerns for this proposed development which I have raised during the previous meetings, it is believed that this can be achieved.

- Separation of public realm, commercial and office/lab space will be key (within the building). There should be no areas of crossover that could lead to potential conflict.
- Landscaping to provide clear access routes with excellent lines of sight. Visibility lowers the fear of crime. There should be no opportunities for concealment which could increase the risk of robbery, burglary and theft. Concealment also includes the stashing of weapons, drugs and other illicit items. Management of this area will be key and include both security and maintenance patrols.
- Lighting will also be important within this development and externally should meet BS 5489-1 2020. Any lighting need to complement the existing or any proposed CCTV system

Other considerations:

- Compartmentation will be key to mitigating the risk of anti-social behaviour and acquisitive/opportunistic crime. Drugs are also a key issue for the borough of Camden and the development must not become a kindly habitat for gangs to enter and take control. It is noted that this area has the added benefit of a security team that patrols the environs and actively monitors CCTV.
- With the possibility of lab space it must be acknowledged that (dependant on the company and lab usage) protests may occur. Consider an area for this to be facilitated which will have the least impact upon other buildings/businesses as well as road users and pedestrians.
- With the large amount of landscaping around the tower and the numerous areas which are public/semi-public including under crofts it will be down to the security teams to manage this space. It should not fall to local policing resources to tackle issues potentially created in this area.

It is strongly recommended that this location have security rated products to mitigate against the risk of theft and other forms of acquisitive crime to provide some protection for residents that will be housed at this location.

I am happy to make further recommendations for this development through consultation with the applicant.

I strongly recommend that the following conditions be placed upon this application.

- 1. Prior to construction proof that the plans can achieve secured by design accreditation must be submitted to the design out crime officer and local planning office.**
- 2. For the site to achieve a secured by design accreditation to silver award and to maintain this standard through the life of the development.**

Further consultation is required in the pursuit of achieving SBD certification for the development. If yourself or the applicant wishes to discuss any of my recommendations further then please feel free to contact me. The advice I have provided has been taken from the following guides:

https://www.securedbydesign.com/images/HOMES_GUIDE_2023_web.pdf

https://www.securedbydesign.com/images/COMMERCIAL_GUIDE_2023_web.pdf

The advice has been adjusted taking into consideration crime statistics and analysis of the area. Further consultation is required in the pursuit of achieving SBD certification for the development.

Kind regards

Aran

Appendix A

Camden planning response template – NPPF and Camden local plan references

Section 17 of the Crime and Disorder Act 1988

“It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in it’s area”, as clarified by PINS953.

The NPPF and Camden’s own local guidance can support this proposal:

Section 91 of the NPPF states:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;.....”

Section 127 of the NPPF further adds:

Planning policies and decisions should ensure that developments..

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”

Taken from the Camden Supplementary Guide to Design (January 2021 revision)

- *The Council requires that developments demonstrate that they have been designed to contribute to community safety and security.*
- *Security features must be fully considered and incorporated at an early stage in the design process.*
- *Designing-against crime features, safe access and security measures must complement other design considerations and be considered as part of a holistic approach to designing and maintaining safer environments for all.*
- *Better designed environments support safer and healthier communities.*
- *Consideration will be given to the impact of measures on the surrounding area to ensure that there is not displacement of activity into surrounding neighbourhoods.*
- *Safer environments support healthier communities.*

In accordance with Local Plan Policy C5 Safety and Security, the Council will require applicants to demonstrate that all impacts of their proposal on crime and community safety have been considered and addressed. Applicants should be able to demonstrate that they have consulted Met Police Designing Out Crime Officer (details of which can be found at www.securedbydesign.com) and that proposals take into account the advice given and achieve Secured by Design certification, where appropriate.

Policy C5 Safety and security (From the Camden Local Plan)

The Council will aim to make Camden a safer place. We will:

- (a) work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;*
- (b) Require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;*
- (c) Require appropriate security and community safety measures in buildings, spaces and the transport system;*
- (d) Promote safer streets and public areas;*
- (e) Address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town, Central London and other centres and ensure Camden's businesses and organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design; and*
- (f) Promote the development of pedestrian friendly spaces.*

We strongly encourage security features to be incorporated into a scheme from the beginning of the design process and complement other key design considerations. Internal security measures are preferred. Further information on designing safer environments is set out in our supplementary planning document Camden Planning Guidance on design.

It is important to take a proactive approach at an early stage to reduce risks and opportunities for crime and ASB to occur, rather than relying on reactive measures such as

CCTV, which should only be used as part of a package of measures to reduce crime. Incorporating designing out crime features into a development should complement other key design considerations and high quality architecture and design should still be achieved.

Considering good design early in the design process will lead to a better quality development overall.

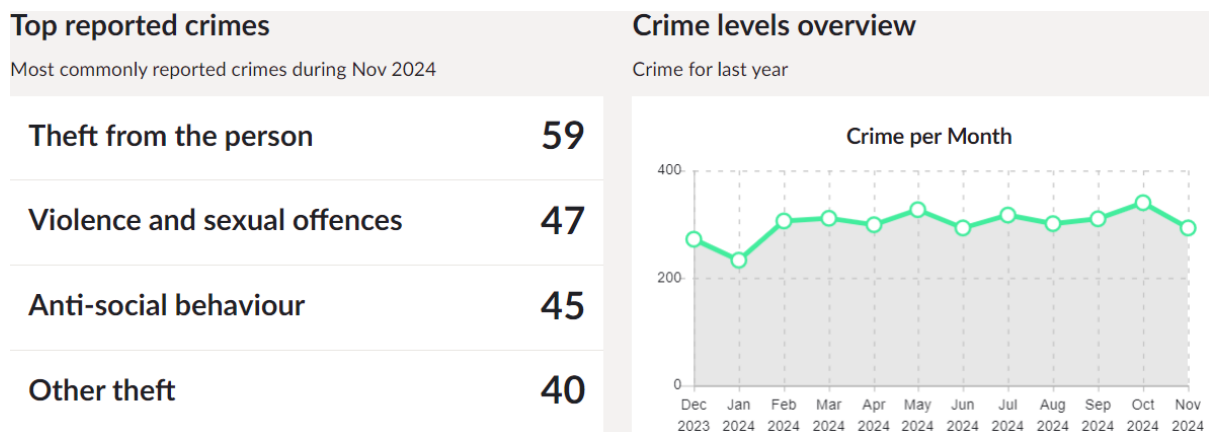
The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered. Careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would

encourage antisocial behaviour. The use of the site and layout should also be carefully considered as these can also have a major impact on community safety.

From the Camden local plan;

“Camden’s food, drink and licensed entertainment premises contribute to the attractiveness and vibrancy of the borough but, where there is a concentration of late night activity, there can also be problems such as noise and disturbance, littering, antisocial behaviour, crime and violence. The cumulative impact of these uses will therefore be assessed in line with our town centre policies, particularly Policy TC4 Town centre uses and Policy A1 Managing the impact of development. The Council will also take into consideration any concerns raised from stakeholders within adjoining areas beyond Camden’s boundaries. Alcohol related crime and late night disorder have been identified as significant issues, particularly within Camden Town and the Seven Dials area of Central

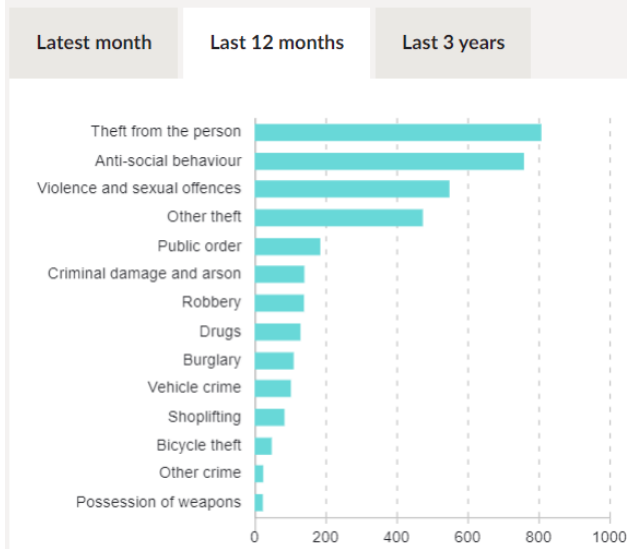
London. Camden’s Statement of Licensing Policy sets out the Council’s approach to licensing and special licensing policies apply to these areas.”



Line graph showing the number of crimes over the last twelve (12) months for Regents Park ward.

Crime types description

for the last 12 months (from Dec 2023 to Nov 2024)



Bar chart indicating the types of recorded crimes over the last twelve (12) months on Regents Park ward

| Type | Total | Percentage |
|------------------------------|-------|------------|
| Anti-social behaviour | 761 | 21.1% |
| Bicycle theft | 50 | 1.4% |
| Burglary | 112 | 3.1% |
| Criminal damage and arson | 142 | 3.9% |
| Drugs | 131 | 3.6% |
| Other theft | 476 | 13.2% |
| Possession of weapons | 25 | 0.7% |
| Public order | 187 | 5.2% |
| Robbery | 141 | 3.9% |
| Shoplifting | 86 | 2.4% |
| Theft from the person | 810 | 22.5% |
| Vehicle crime | 104 | 2.9% |
| Violence and sexual offences | 551 | 15.3% |
| Other crime | 26 | 0.7% |

Number of crimes on Regents Park ward over the last twelve (12) months

The primary objective of an efficient Police Service is the prevention of crime

Crime Prevention advice can be found on the Metropolitan Police Service Website –

<http://content.met.police.uk/site/crimeprevention>

(Crime figures obtained from www.police.uk and are as most recent as available)

'Crime prevention advice is given freely without the intention of creating a contract. Neither does the Metropolitan Police Service take any legal responsibility for the advice given. You must abide by the fire and safety regulations and if you are in any doubt consult the Fire Prevention Officer and the Council's Building Control Officers.'

From: [Emily Leslie](#)
To: [David Fowler](#); [Sophie Hinton](#)
Subject: Euston Tower - environmental comments (GLA ref: 2024/0174/S2, LPA ref: 2023/5240/P)
Date: 07 February 2025 17:26:24
Attachments: [2024-0174 \(Stage 2\) GLA Consultation - AO Memo v1.0.xlsx](#)
[10. Euston Tower GLA CE Memo Stage 2 22.01.25.xlsx](#)
[20240174 \(20240087\) Euston Tower \(Post Stage 1\) GLA Consultation - Energy Memo 2023.xlsx](#)

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Hi David and Sophie,

Please see Post Stage 1 environment comments in relation to the Euston Tower proposals, attached and below:

1. **Energy**

Please see attached updated Energy Memo and short summary of comments below. The majority of the comments are unresolved as applicant has provided an updated energy statement without providing response directly on the energy memo, some Be Lean methodology amendment is needed. Further information is required on:

- GLA spreadsheet
- Be Lean - clarifications on specification, amendment of discrepancies and further measures required.
- Be Clean - heat network correspondence required.
- Be Clean - heat network drawings required
- Be Clean - non-domestic should be connected to heat network or further justification should be provided.
- Be Clean - confirmation of heat network compatibility
- Be Green - PV roof plan further maximisation
- Be Green - ASHP information
- Confirmation of compliance with Be Seen
- Draft S106

2. **Circular economy (CE)**

Please see attached updated CE Memo and short summary of comments below:

The Applicant has provided a revised Circular Economy Statement and GLA CE template in response to previous comments and subsequent scheme changes, which is welcomed.

It is welcomed that the Applicant is taking actions at this stage to maximise potential for high value reuse and recycling of components and materials on the site. The Applicant should illustrate this breakdown in the Recycling and Waste Reporting table in the GLA CE template. The Applicant should provide additional information to explain how the implementation of these processes will be ensured, particularly where these go beyond standard practice in terms of demolition processes.

The Applicant should review the Bill of Materials and provide clarification, including revision as necessary where the reporting varies by ~10,000,000kg between the CES and WLCA. The Applicant should provide reused and recycled content calculations at this stage in response to the GLA target. Clarification should be provided with respect to the Operational Waste Management Strategy which does not appear to have been updated at this stage.

Please refer to the attached document for detailed comments. It is noted that responses were

not provided in the GLA CE memo. Where there were specific requests for additional information to be provided at this stage, best attempts have been made to locate this. However, please can the Applicant team provide responses in the memo next time to indicate the relevant documents, sections and subsections where this information has been included, due to the extent of the Circular Economy Statement submission and its associated documents.

3. **Biodiversity**

The GLA Green infrastructure team has advised the following in relation to biodiversity: “The previous Stage 1 requested that the applicant should confirm that the trading rules have been satisfied. As the scheme has been updated since Stage 1, the applicant has provided an updated Biodiversity Net Gain assessment. The applicant has confirmed that the proposal delivers 3.35 habitat units on site and 0.07 habitat units off site, which results in an overall increase of 0.86 habitat units. This is equivalent to a biodiversity net gain in habitat units of 35.39%. The applicant has confirmed that the trading rules have been met. However, the applicant should review the metric used following the issue of the statutory metric on 12th February 2024 or provide robust justification. This should be provided as soon as possible to demonstrate compliance with Policy G6”.

4. **Air quality (AQ)**

Please find a memo from the GLA AQ officer attached. No further response is required on AQ matters during planning stage. Recommended conditions are included in the spreadsheet.

5. **Transport, design and heritage matters**

My colleague, Melvyn Dresner at TfL, has responded on transport matters separately. I am awaiting feedback internally from colleagues in relation to design and heritage matters, and I will provide our comments on this element of the scheme as soon as I can (I expecting to do so by the end of next week).

Kind regards,

Emily Leslie

Principal Strategic Planner, Development Management, Planning

Greater London Authority

Union Street, London SE1 0LL

Mob: 07825592508

My pronouns are she/her

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From: [Emily Leslie](#)
To: [David Fowler](#); [Sophie Hinton](#)
Subject: Euston Tower, Camden - post Stage 1 - transport, design and heritage (GLA ref: 2024/0174/S2)
Date: 19 February 2025 18:07:49
Attachments: [RE Euston Tower - Revised Application.msg](#)
[20235240P Euston Tower 286 Euston Road \(GLA ref GLA20240087S101\).msg](#)

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Hi David and Sophie,

Please see Post Stage 1 comments in respect of transport, design and heritage matters relevant to the revised scheme, set out below and attached:

1. **Transport**

As requested, please see correspondence between TfL and the applicant's transport consultant. I note Melvyn (TfL) has also emailed again this morning - I have attached this in case it was not received.

2. **Urban design**

Summary

Overall, GLA Officers support the proposed changes to the scheme, which are positive. Most notable changes relate to the buildings form, expression and materials which have resulted in an improved building silhouette and reduction in the building perceived bulk. Moreover, the impact on strategic views is also improved, the buildings calmer and paler palette would not appear dominant in panoramic and river prospect views.

The changes to the architectural approach and detailing are acknowledged and supported.

There is a strong visual relationship between the base, podium, and main part of the building achieved by using similar and complimentary materials and supported by the detailed design.

Overall, the building has a strong aesthetic which resonates strongly with the context and other tall buildings in the area (Centre Point). The detailed design is well considered and successful leading to a sculptural textured building that considers the buildings appearance of immediate, mid-range and long-range views.

GLA Officers are supportive of the podium and base of the building that relates well to the human scale where buildings lines allow for generous public realm and soft landscaping. The threshold level changes between the building and Regents Place Plaza create an effective transition between the two spaces. Overall, the pedestrian experience would be an improvement of the existing condition and Stage 1 design iteration.

The proposal has gone through a robust design review as part of the pre-application and post-application process with input and guidance from LB Camden DRP, community consultation and LB Camden officers. This has led to a scheme that GLA Officers are broadly supportive of in terms of the design.

Urban design: Built form, height, and massing

The reduction in mass along the Hampstead Road elevation is supported. This has several benefits including an improved building form and silhouette, as well as reducing the overall perceived bulk of the building particularly in near and far views.

The set back from Hampstead Road also increases the public realm offering which is strongly supported.

The proposal to break up the mass of the building into quadrants is effective in breaking up the buildings mass and creates elegant vertical proportions.

The fillet edges to the tower create a gentle curve that softens the buildings edges, which is supported.

Urban design: architecture and materials

Although elevations are calmer, they retain a sculptural quality mainly due to upstands that are skilfully integrated into the elevation, giving depth and relief.

The change in facade colour is supported. The previously proposed orange hue appeared quite prominent in views including from LVMF Views 2A.2, 2B.1 at Parliament Hill and 4A.2 at Primrose Hill. The updated views demonstrate that the calmer cooler palette works well in the context and in townscape views.

The TVBHA includes LVMF 2B.1 'Parliament Hill: east of summit - at the prominent oak tree (VIEW A8). In this view the proposal would not intrude in the protected vista and have a similar impact to the existing condition albeit a lighter tone. There would be no impact from Lambeth Bridge LVMF19A.1 and 19A.2.

The principle of a base, tower and top is supported.

GLA Officers support the rationalisation of the base of the tower which makes the tower appear more grounded, less imposing and relates well to the human scale. There is a strong visual relationship between the base and the rest of the tower which is supported.

GLA Officers support expressing the upper storeys of the buildings as the 'crown' and the principle of a sculptured crown. The top of the building is clearly defined.

The breathing spines appear recessive and detailed appropriately.

3. **Heritage**

Assessment of impacts

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

| Table of indirect (setting) impacts | | | |
|--|-------------------------|-----------------------|---|
| Heritage asset | Category of harm | Extent of harm | View reference |
| Westminster World Heritage Site and associated listed buildings; | No harm | No harm | Views 01, 02, 03, A1, A2, A3, A4, A5, A6, A7 |
| Regents Park Registered Park and Garden, Grade I and Conservation Area and the listed buildings within them; | Less than substantial | Very low | Views 04, 05, 06, 07, 08, 16, A13, A14, A15, A16, A20, A21, B2, B3, B4, B13 |
| BT Communication Tower, listed Grade II; | Less than substantial | Very low | Views 01, 02, 03, 04, 09, 10, 11, 20, A8, A12, A17, A18, B5, B15 |
| Number 131 Drummond Street and The Crown and Anchor Public House, listed Grade II; | Less than substantial | Very low | View 12 |
| Fitzroy Square Conservation Area nearby to the south and the listed buildings within it; | Less than substantial | Low to middle | Views 19, 22 |

| | | | |
|--|-----------------------|----------|---|
| Bloomsbury Conservation Area to the southeast and the listed buildings within it including the Church of St Pancras, Grade I and Euston Fire Station, Grade II*; | Less than substantial | Very low | Views 13, 14, 17, 18, 20, 21, 22, 29, A22, B15, B21 |
| Harley Street Conservation Area to the southwest and the listed buildings within it; | No harm | No harm | Views A20 |

The existing Euston Tower is tall (152.380m AOD) for its context and falls into the setting of many highly graded heritage assets. Because the existing building is dark in colour and the mixture of black and turquoise glass elements, arranged in stripes, along with the complex and orthogonal massing, increases these impacts, in many cases it is harmful to settings. The proposed development (as amended) is very slightly taller (153.300m AOD) and somewhat wider. It therefore tends to perpetuate (and, from certain angles, slightly increase) the harm caused by the existing building and this is reflected in the assessment in the table above. The proposed development has been redesigned, with the following changes made:

- The sloped facades have been removed and the building now has vertical sides;
- The articulation of the facades has been simplified;
- The corners are curved to reduce the perception of width;
- The massing is broken up by an inset element in the centre of each façade;
- The massing has been set back along Hampstead Road;
- Changes have been made to the crown and podium datums;
- The material has changed in type and colour and is now white/grey GRC which resembles Portland stone;
- Changes have been made to the ground floor to simplify the articulation.

These changes result in a visually calmer building and go some way to mitigating the harm. This is reflected in the reassessment of the levels of harm in the table above.

It is noted that the submitted TVBHA (at Para 6.88) takes a similar approach: “The Proposed Development would therefore continue to give rise to ‘harm’ in NPPF terms to the significance of heritage assets in the study area. This harm is in all instances judged to be at the same scale as that caused by the existing Euston Tower, which is ‘less than substantial’, generally at the lower end of the scale but in some instances at the middle of that scale.”

The increased width of the building affects the visibility of the BT Communication Tower as the viewer moves south along Hampstead Road and this is noticeable in Views 09, 10 and 11, causing a degree of harm to the setting of the BT Tower, since they reduce the primacy and singularity of the asset in the view.

Kind regards,

Emily Leslie

Principal Strategic Planner, Development Management, Planning

Greater London Authority

Union Street, London SE1 0LL

Mob: 07825592508

My pronouns are she/her

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From: David Fowler
To: Patrick Little
Subject: FW: 2023/5240/P - Euston Tower December submission - Energy and Sustainability
Date: 14 February 2025 17:03:34
Attachments: image01.png
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 image04.png
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****External Email. This email originated from outside Buro Happold.****

Hi Patrick,

Please see Energy and Sustainability comments below.

Thanks,

David

David Fowler
 Deputy Team Leader

Telephone: 0207 974 2123

From: Katherine Frost <Katherine.Frost@camden.gov.uk>
Sent: 14 February 2025 13:55
To: David Fowler <David.Fowler@camden.gov.uk>
Cc: Nicola Tulley <Nicola.Tulley@camden.gov.uk>
Subject: 2023/5240/P - Euston Tower December submission - Energy and Sustainability

David

Thank you for consulting us on the updated application for Euston Tower. Apologies for the delay in responding there has been a significant amount of information for consideration. Please see comments and issues on Energy and Sustainability below.

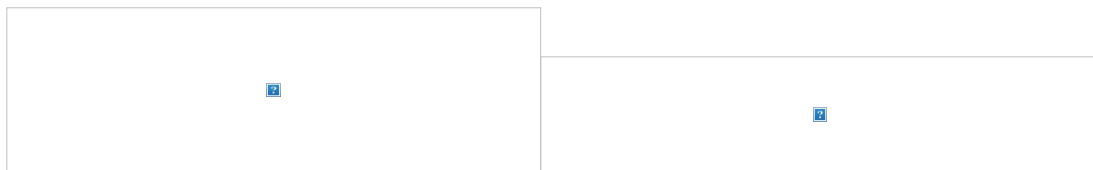
| GLA spreadsheet v2 | Non-residential new-build | | |
|--------------------|---------------------------|-----------------------|--------------------|
| | Total tCO2 | Stage reduction, tCO2 | Stage reduction, % |
| Baseline | 297.76 | N/A | N/A |
| Be Lean | 275.11 | 22.7 | 7.6% |
| Be Clean | 275.11 | 0.0 | 0.0% |
| Be Green | 251.24 | 23.9 | 8.7% |
| TOTAL | 251.24 | 46.5 | 15.6% |
| On-site target | | 104.2 | 35.0% |
| Shortfall | | - | - |
| Overall target | | 297.8 | 100.0% |
| Shortfall | | 251.2 | 84.4% |
| Offset payment | £716,023 | | |

- Overall carbon reduction of 15.6% does not meet the requirement for 35% minimum on site. It is noted that Part L 2021 baseline for commercial developments assumes low carbon heating so reductions from the baseline are harder to achieve for commercial developments
- Overall carbon reduction of 15.6% does not meet the requirement for net zero carbon and therefore a carbon offset payment of £716,023 is required (251.236 tonnes at £95 per tonne for 30 years)
- A reduction of 7.6% in carbon emissions through energy efficiency measures at Be Lean stage does not meet the requirement of 15% for commercial developments
- A reduction of 15.6% in carbon emissions at Be Green stage does not meet the requirement of 20% from onsite renewable energy

Comment: The proposals do not meet the policy targets for carbon reduction but it is noted that due to the changes to building regulations initially non-residential developments may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35 per cent improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments. However, planning applicants will still be expected to follow the energy hierarchy to maximise carbon savings before offsetting is considered.

Issue 1: Zero carbon has not been achieved and therefore a carbon offset of £716,023 is required (251.236 tonnes at £95 per tonne for 30 years. **ACTION: Secure carbon offset payment of £716,023 through S106**

EUI – Energy Use Intensity

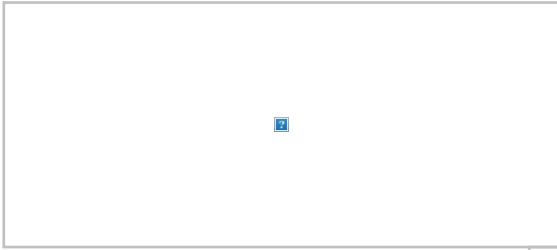


Comment: It should be noted that the main argument for significant demolition is that the floor to ceiling heights and layout would not be able to accommodate lab enable spaces – therefore it is reasonable to assess the application on the energy use of lab enabled spaces. The results show that the most energy consumption is associated with 'unregulated loads' of equipment/ small power and therefore cooling, along with lifts and escalators (other). In this case, the equipment energy consumption is particularly high due to the requirement of the lab enabled spaces.

Issue 2: The proposals will require significant electricity. Confirmation required that UKPN will have sufficient grid capacity for energy consumption peak including with lab tenants. **ACTION: Further information required.**

Issue 3: There is inconsistency in results in table 11 in the main report and table 12 in the Appendix. Clarification on the figures and an updated Energy Strategy should be provided. With the figures presented energy intensity is 158.3 kW/m2 for the Baseline Office/lab which is significantly above the 55 target for offices. What are the key reasons this is so high and what has been done to reduce it as far as possible. **ACTION: Further information required.**

Be Lean



Comment: The proposals include LED throughout, good air tightness, all electric systems ASHP, waste heat to hot water, on floor AHU's shut off unoccupied floors and peak cooling topped up by air cooled chillers (higher efficiency cooling than ASHP when no simultaneous heating load). Low g-value 0.3 of glazing to limit peak solar gain to acceptable levels and some exposed thermal mass but not assumed natural ventilation (but potential allowed). **Curtain walling is significantly less thermally efficient than a wall** would be required to be under building regulations limiting values and is expected to have a similar efficiency to a window (max of 1.6W/(m².K) for curtain walling or windows vs 0.26 W/(m².K) for wall). The proposed curtain wall system is more efficient than the baseline for curtain walling in Building Regulations at 1.24W/m².K but the inclusion of curtain walling rather than other facades impacts on the overall thermal efficiency of the building.

Issue 4: It is not clear on what basis the natural ventilation option would be delivered for the development Page 13 of the Energy Strategy states this will be explored at the next stage. Would vent opening be linked to automatic deactivation of active cooling systems and how would this work in terms of zoning on floors (if one vent is open would the whole floor turn off). A condition is recommended to secure details and ensure that the proposals are fully considered and will deliver energy savings in operation. Also see further comments later on ventilation and overheating.
ACTION: Further information required. Condition recommended.

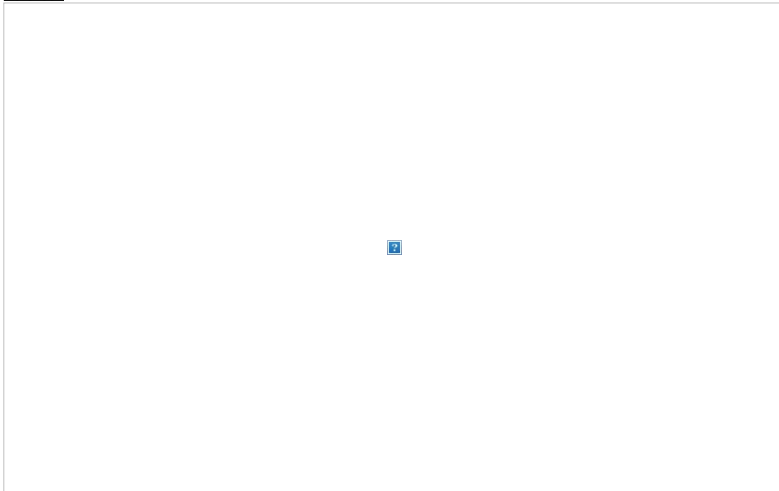
Issue 5: The choice of curtain walling is significantly less efficient than a wall at 1.24W/m².K and this impacts on the overall thermal efficiency of the building. The Energy Statement states that numerous façade options were explored informing the previous planning submission – details of the options should be provided to clearly justify this choice despite concerns being raised at the previous submission stage. **ACTION: Further information required.**

Be Clean:

7.1 states "Sleeves through the basement walls will be provided to allow pipework to pass through and connect into a future district heating network. Suitable space in the basement area will be allocated for the installation of heat exchangers as may be required in the future for heat network connection.

Issue 6: Proposal to future proof connection welcomed. Confirmation required that the proposed system is communal low temperature heating which is compatible with future heat network connection. **ACTION : Further information required and Secure future proofing through s106**

Be Green



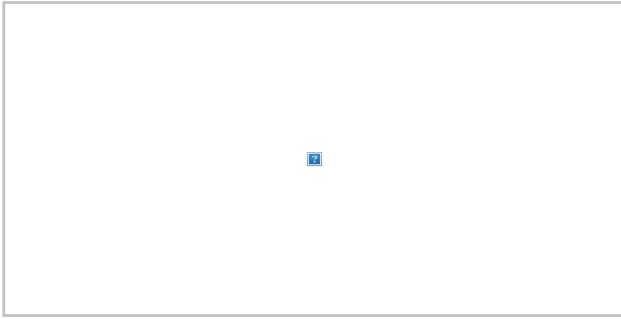
Comment: A variety of technologies for renewable energy have been considered with solar PV and air source heat pumps considered to be the only feasible options. Ground source heat pumps were not considered feasible due to the retention of the existing basement slab. Limited space is stated to be available for Solar PV space due to demands on roof space. Consideration was made to additional PV on the 'open void' areas but these are steep slopes with directions blades with a passive design to drive air into the chillers to improve their efficiencies so are not considered suitable for additional PV.

Issue 7: Given the proposals do not meet the 20% Be Green target and the long build time of this scale of development and expected further consideration of PV at stage 4, then a condition is recommended for Solar PV to be reassessed at future design stage to ensure high efficiency and maximum coverage. **ACTION: Condition recommended to secure minimum 63 panels and 23.31kWp and consideration of any additional areas or increase capacity of solar PV**

Maximising Solar PV

Prior to commencement of development other than site clearance & preparation, a feasibility assessment with the aim of maximising the provision of solar photovoltaics should be submitted to the local planning authority and approved in writing. The proposals should include as a minimum the approved no.63 panels with energy generation capacity at least 23.31kWp. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities and contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local plan Policies



Be Seen

Issue 8: Building Management System proposed and GLA's Be Seen reporting spreadsheet will be submitted. **ACTION: Condition/ S106 requirement recommended to ensure Be Seen reporting post construction.**

Be Seen' energy monitoring

Clauses

a) Prior to each Building being occupied, the Owner shall provide updated accurate and verified 'as-built' design estimates of the 'Be Seen' energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the 'As-built stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance (or any document that may replace it). All data and supporting evidence should be submitted to the GLA using the 'Be Seen' as-built stage reporting webform ([Be seen' energy monitoring guidance \London City Hall](#)). The owner should also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in the 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it).

b) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it). All data and supporting evidence should be submitted to the GLA using the 'Be Seen' in-use stage reporting webform ([Be seen' energy monitoring guidance \London City Hall](#)). This obligation will be satisfied after the Owner has reported on all relevant indicators included in the 'In-use stage' chapter of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it) for at least five years.

c) In the event that the 'in-use stage' evidence submitted under Clause b) shows that the 'As-built stage' performance estimates derived from Clause a) have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures identified in Clause b) shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.

Definitions

"Defects Liability Period" means such period of time following Practical Completion of a Building in which a contractor may remedy defects as may be included in the building contract for the relevant Building;

"Reportable Unit" means a Reportable Unit (Energy Centre), Reportable Unit (Residential) or Reportable Unit (Non-Residential);

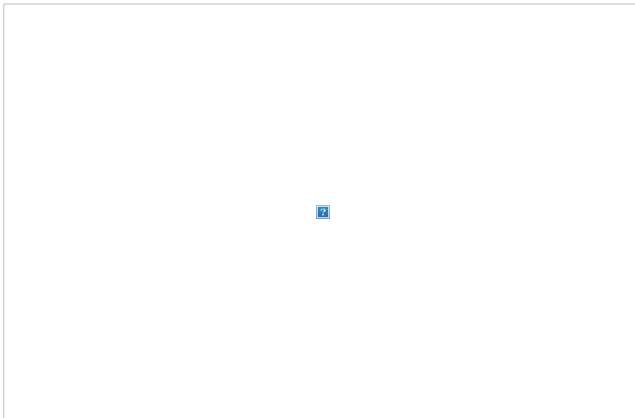
"Reportable Unit (Energy Centre)" means either a connection to a third-party District Heating Network, a self-contained Energy Centre serving multiple residential/non-residential properties (within the Site) or a self-contained energy system serving multiple residential properties (within a Block or Building);

"Reportable Unit (Residential)" means an individual Block or Building of five or more flats or a group of five or more houses;

"Reportable Unit (Non-Residential)" means a Building with a single occupier/tenant (including block of flats' communal areas) or a Building with multiple tenants;

Sustainability

Overheating:



Comment: See above for Be Lean / Issue 2 - Low g-value 0.3 of glazing to limit peak solar gain to acceptable levels and some exposed thermal mass but not assumed natural ventilation (but potential allowed).

Issue 9: The cooling hierarchy requires consideration of passive ventilation where feasible unless constrained (for example in Laboratories). The office floors should have natural ventilation unless proven to not be feasible. Further details are required on the external blind integrated into the Closed Cavity Façade. The area weighted average (MJ/m²) and total (MJ/year) cooling demand for the actual and notional building has not been provided (as per GLA guidance) and the applicant should demonstrate that the actual building's cooling demand is lower than the notional. **ACTION: Further information required.**

BREEAM

A BREEAM pre assessment has been undertaken for the Retail and the Office and Research Development areas

Retail Areas:

Overall – BREEAM Very Good (63.25%) does not meet the Excellent requirement. Note: Potential for 8.36% additional credits – should be targeted to achieve 71.61% which would be BREEAM

Excellent

Energy -1 out of 13 credits targeted = 7.69% does not meet the 60% minimum standard. Note: Potential credits 4 would bring this to 5/13 or 38% which is still well below the requirement

Water - 3 out of 3 credits targeted = 100% meets the 60% minimum standard

Materials - 7 out of 10 credits targeted = 70% meets the 40% minimum standard

Office with Research Development areas:

Overall – BREEAM Excellent 87.9% meets the requirement

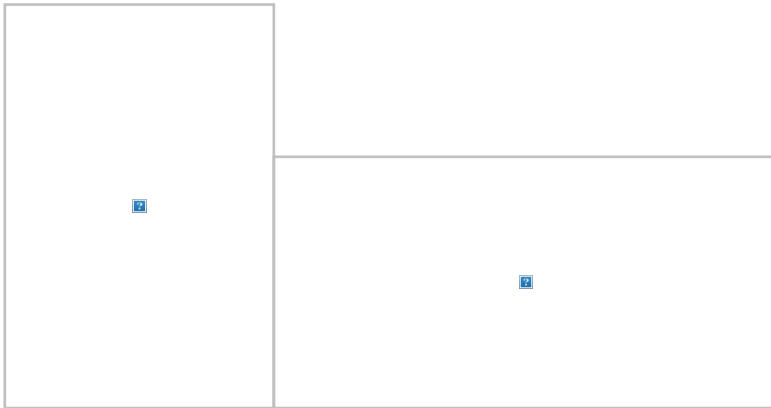
Energy – 19 out of 22 credits targeted = 86% meets the 60% minimum standard

Water – 7 out of 10 credits targeted = 70% meets the 60% minimum standard

Materials – 9 out of 13 credits targeted = 69% meets the 40% minimum standard

Issue 10: BREEAM Excellent is not currently targeted for the Retail areas but could potentially be achieved. However the 60% for Energy is not achievable but the current targeting of only 1 out of 13 credits for energy is unacceptable. Further detail required on why this is performing so poorly and why further credits cannot be achieved. All potential credits should be targeted. **ACTION: Not targeting BREEAM excellent and targeting of only 1 out of 13 credits for energy for the retail areas is unacceptable. Further information required. Secure BREEAM Excellent and targets through s106.**

Whole Life Carbon:



Comment: Whole Life Carbon assessment is required for this scale of development which is 'Referable to the Mayor'.

| Modules | Min benchmark for OFFICE (kgCO ₂ e/m ² GIA) | Aspirational Benchmark for OFFICE (kgCO ₂ e/m ² GIA) | Proposal (kgCO ₂ e/m ² GIA) |
|--|---|--|---|
| A1-A5 | <950 | <600 | 703 |
| B-C (excl B6 & B7) | <450 | <370 | 537 |
| Total A-C (ex B6&B7 inc sequestration) | <1400 | <970 | 1225 |

Issue 11: The proposals meet the minimum benchmarks for modules A1-A5 and overall total including sequestration but do not meet the aspirational benchmarks. It is also noted that they do not meet the minimum benchmark for offices for modules B-C which is stated to be largely due to the extent of MEP (mechanical and electrical plant) which is proposed for the lab enabled spaces (which make up 30% of the proposal) which are not reflected in the benchmarks. The proposed refrigerant for the plant has an assumed global warming potential of over 650. Whilst lower than some, this has an impact on the whole life carbon for the development and lower carbon options for this and other aspects should be considered at design stage 4. A post construction assessment of whole life carbon should be completed in line with GLA guidance. **ACTION: Conditions recommended**

Whole Life-Cycle Carbon Assessment

You must apply to us for approval of an updated version of the Whole Life Carbon Assessment hereby approved at each of the following stages of development:

- (a) Prior to commencement of any work on site including all works of deconstruction and demolition.
- (b) Prior to commencement of any construction works.

Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 703kgCO₂e/m² and/or Whole Life Carbon (A1-C4) above 1225kgCO₂e/m², which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised. You must not commence any work on site and/or construction works (as appropriate pursuant parts (a) and (b) above) until we have approved the updated assessment you have sent us. You must then carry out works, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

Reason: To ensure the development minimises carbon emissions throughout its whole life cycle and optimises resource efficiency in accordance with Policy SI2 in the London Plan 2021 and Policy CC1 of the Camden Local Plan.

Whole Life-Cycle Carbon Assessment Reporting

Prior to the occupation of the development:

- a) the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance and
- b) confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings

Circular Economy:

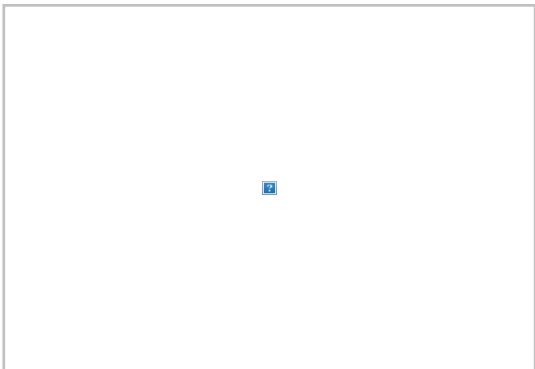
GLA WLC spreadsheet tonnages vs Circular Economy spreadsheet vs CES report...





Comment: A Circular Economy Statement and spreadsheet have been provided which includes a Pre demolition Audit and a Bill of Materials. The proposals state they seek to retain 31% of the existing structure by volume. The London Plan Policy SI 7 looks to reduce waste and support the circular economy by keeping products and materials at their highest use for as long as possible. Both Camden and London Plan guidance require justification of demolition.

Issue 12: There is a difference of 10,328,235 tonnes of material between the 80,637,20kg reported in the GLA Whole Life Carbon spreadsheet and the 70,308,885 reported in the Circular Economy statement. A large proportion of this seems to be related to missing of 10,324,160 tonnes of excavation waste from the substructure reported in the WLCA from the CE spreadsheet. Further the CE report refers to 37,521 tonnes of excavation waste in section 3.2.3 but aligns with the WLCA spreadsheet and reports 10,324t in section 3.3.1 but refers to 30,408tonnes in 3.4.2 and the recycling and waste reporting table on page 252. There is also mention of retention of 31% of the existing structure by volume but I was unable to locate how this was calculated. Figures on the tonnes of material to be retained also seemed to vary throughout the document – 2.4.2 refers to c.17,000 tonnes of concrete and 2.2.1 refers to 14,471 tonnes of concrete being retained. **ACTION: Corrections, clarifications and further information required.**



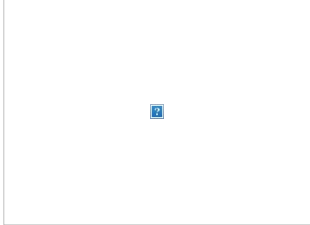
Issue 13: The proposed targets of 98% diverted from landfill for construction and demolition waste, 96% diverted from landfill for construction waste and 95% diverted from landfill for excavation waste are welcomed and should be secured through condition. **ACTION: Condition Recommended**

Construction and Demolition Waste: Delivered in accordance with details.
The Circular Economy Statement as approved [\(include reference to documents\)](#) shall be delivered to achieve at least 95% reuse/recycling/recovery of construction and demolition waste and 95% beneficial use of excavation waste.

Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.

Post-construction monitoring report
Prior to the occupation of the development a postconstruction monitoring report and spreadsheet should be completed in line with the GLA's Circular Economy Statement Guidance. The post-construction monitoring report shall be submitted to the GLA, currently via email at: circularconomystatements@london.gov.uk along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the development.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials



Kind regards
Katherine

Katherine Frost
Senior Sustainability Officer (Planning)

Environment and Sustainability
Supporting Communities
London Borough of Camden

Tel: 020 7974 5922
Web: camden.gov.uk

5 Pancras Square
London N1C 4AG



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Environment Department

Katie Stewart

Executive Director Environment



Camden Council
Attn David Fowler

Telephone 020 7332

Fax 020 7332 1806

Email

John.Grierson@cityoflondon.gov.uk

Your ref

Our ref 25/00020/OBS

Case Officer

John Grierson

Date 12 February 2025

Town and Country Planning Act 1990

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

In response to your notification received on 9 January 2025, Please see our comments below:

SCHEDULE

Application Number: **25/00020/OBS**

Location: **Euston Tower 286 Euston Road London NW1 3DP**

Proposal : Consultation by London Borough of Camden on an application for proposed 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 (LBC ref. 2023/5240/P).

- 1 The City of London Corporation raises no objection to the proposal.

City of London PO Box 270, Guildhall, London EC2P 2EJ

Switchboard 020 7606 3030

www.cityoflondon.gov.uk

www.cityoflondon.gov.uk/plans

A handwritten signature in black ink, appearing to read "D. Gwyn Richards". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Gwyn Richards

Planning and Development Director

Date of issue: 12 February 2025



Mr David Fowler
London Borough of Camden
Development Management
Town Hall
Judd Street
London
WC1H 9JE

Direct Dial: 020 7973 3091

Our ref: P01570554

22 January 2025

Dear Mr Fowler

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**EUSTON TOWER 286 EUSTON ROAD LONDON NW1 3DP
Application No. 2023/5240/P**

Thank you for your letter of 2 January 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

We previously raised concerns about the harmful impact of the proposed redevelopment on surrounding heritage assets, including the Fitzroy Square Conservation Area and Regent's Park (letter dated 22.01.24). The materials, colour and articulation of the building, combined with the increase in bulk compared to the existing Euston Tower, would have made it a more distracting element in their settings.

The revised design has a calmer and more ordered façade design, alongside a more muted colour. These changes help to make the proposed development less assertive and so would reduce the level of harm. We are pleased to see that our advice has been taken into account and consider that our previous concerns have largely been addressed.

Recommendation

Historic England has no objection to the application on heritage grounds. The proposed design changes have largely addressed previous concerns.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Alexander Bowring

Inspector of Historic Buildings and Areas

E-mail: Alexander.Bowring@historicengland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

David Fowler
Development Management
London Borough of Camden
Town Hall
Judd St
London
WC1H 9JE

20 February 2025

Dear David Fowler,

RE: Planning Application: 2023/5240/P

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

Thank you for providing The Royal Parks (TRP) the opportunity to comment on amendments to the above-mentioned planning application.

The Royal Parks is the charity responsible for managing London's eight Royal Parks on behalf of the Department for Culture, Media and Sport, and ultimately, the Crown. There are eight Royal Parks within Greater London covering almost 2,000 hectares. All of the Royal Parks are designated as Metropolitan Open Land (MOL) under Policy G3 of the London Plan (March 2021). MOL comprises strategic open land within the urban area that "*protects and enhances the open environment*".

The Regent's Park, Kensington Gardens and Greenwich Park are designated heritage assets, being Grade I listed on Historic England's Register of Parks and Gardens, as well as Conservation Areas. In addition, Greenwich Park is a Special Area of Conservation and forms part of the UNESCO World Heritage Site of Maritime Greenwich. Primrose Hill is a designated heritage asset and is listed Grade II on Historic England's Register of Parks and Gardens.

One of The Royal Parks' charitable objects is to protect, conserve, maintain and care for the Royal Parks, including their natural and designed landscapes and built environment, to a high standard consistent with their historic, horticultural, environmental and architectural importance. This includes protecting them from potential harm – notably visual harm - caused by proposed development outside the Royal Parks.

Having reviewed the additional information submitted in this planning application, we believe that Euston Tower will still be visible from The Regent's Park, Kensington Gardens and possibly from Greenwich Park (note it is hard to assess from the views supplied). The Tower will be highly visible from many sites within Regent's Park, most notably the view from the summit of Primrose Hill, which is a designated strategic view, as set out in the London Plan. The supplied visuals also show that the Tower will be visible from the Round Pond in Kensington Gardens.

In light of our charitable objects, TRP is concerned that the additional massing of the proposed development would be detrimental to the views and visual amenity experienced by visitors to the aforementioned Royal Parks. We therefore object to this planning application, and hope that this will be considered in your determination.

We welcome the opportunity to comment further on this matter should the need arise. Please send your correspondence to estatesandprojects@royalparks.org.uk.

Yours sincerely,

Katherine Drew
Estates Manager
The Royal Parks



SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0002

Date of issue of this decision: 05/02/2025



LBS Reg. No.: 25/OB/0002

Date of Issue of Decision: 05/02/2025

Your Ref No.:

Applicant Mr D Fowler - Camden
London Borough of Camden

NO COMMENTS made in reference to your consultation on the following development:

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.

At Euston Tower 286 Euston Road London NW1 3DP

In accordance with your letter received on 8 January 2025 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

London Borough of Camden
Development Control
Town Hall Extension Argyle Street
London
WC1H 8EQ

Our ref: NE/2024/136584/01
Your ref: 2023/5240/P
Date: 11 January 2024

Dear planning development team,

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

Redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works.

Thank you for consulting us on the above application on 3 January 2024.

Environment Agency Position

Based on the information currently available, the development raises no environmental concerns for us. We therefore have **no comment** on the application or associated environmental statements.

Advice to LPA

The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites.

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NO_x), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM₁₀ and PM_{2.5}). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

Cont/d..

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Contaminated Land

This development site appears to have been the subject of past industrial activity which poses a high risk of pollution to controlled waters.

However, we are unable to provide site-specific advice relating to land contamination as we have recently revised our priorities so that we can focus on:

- Protecting and improving the groundwater that supports existing drinking water supplies
- Groundwater within important aquifers for future supply of drinking water or other environmental use. We recommend that you refer to our published '[Guiding Principles for Land Contamination](#)' which outlines the approach which should be adopted when managing this site's risks to the water environment.

We also advise that you consult with your Environmental Health/Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This approach is supported by paragraph 180 of the National Planning Policy Framework.

Advice to applicant

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

Commercial/Industrial developments

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

Pre Application Advice

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Isabel Smith
Planning Advisor

E-mail: HNLsustainableplaces@environment-agency.gov.uk | Tel: 02077142206

| Application No: | Consultees Name: | Received: | Comment: | Response: |
|-----------------|--|---------------------|----------|--|
| 2023/5240/P | Richard Simpson for Regent's Park CAAC | 27/01/2025 17:49:29 | OBJ | <p>Advice from The Regent's Park Conservation Area Advisory Committee 12A Manley Street, London NW1 8LT</p> <p>06 January 2025</p> <p>London Borough of Camden</p> <p>Euston Tower – 2023/5240/P revised scheme December 2024</p> <p>1. The Advisory Committee reviewed the revised application scheme at our meeting on 6 January 2025 when this advice was agreed. The RPCAAC noted that it had considered the developing proposals for the Euston Tower in a lengthy series of reviews. The RPCAAC considered pre-app information at its meeting on 6 November 2023, and the formal application at its meeting on 8 January 2024 when it agreed its advice to Camden objecting to the application. At its meeting on 6 September 2024 the RPCAAC reviewed revisions presented as work in progress in August 2024 and agreed written informal comments subject to review when further changes and CGI views were made available. RPCAAC members attended the public consultation on 7 and 9 November 2024, and the Advisory Committee reviewed the revised scheme at our meeting on 2 December 2024 when we agreed further written comment.</p> <p>2. In these reviews the RPCAAC consistently advised (see RPCAAC advice to Camden 8 January 2024 (paras 4-5)) that changes to the existing Tower should mitigate and not exacerbate the impact of the Tower on Regent's Park and its component heritage assets, that is, its Listed Buildings, the conservation area, and the settings and views of and from these assets. In assessing the proposals in these terms the RPCAAC identified as areas of concern: the bulk and massing of the application building; the detailed forms of the elevations, and the colour of the elevations.</p> <p>Bulk and massing – detailed forms of elevations</p> <p>3. While we welcomed the modification of the detailed forms of the elevations in terms of their impact on the apparent massing of the building in our comments of 6 September 2024 (para. 4-5) and 2 December 2024 (para. 4-5), we found that overall the building would be bulkier than the existing tower. We sought CGIs to test the extent of this increase in massing and its impact. Now that we can see the CGI showing the bulk and massing of the building ('Environmental Statement Addendum' volume 2 view B3 at pp. 285-287) it is clear that the increase in massing – even allowing for the August/November 2024 modifications to the elevations – is significant and fails to mitigate the harm to the heritage assets identified. It fails to preserve or enhance the character and appearance of the conservation area.</p> <p>4. In our original advice of 8 January 2024 (para 6) we welcomed the decision not to increase the height of the Tower. We object to the increase in height now shown in 'Environmental Statement Addendum' volume 2 view B3 at pp. 285-287.</p> <p>Colour of elevations</p> <p>5. In our original advice to Camden of 8 January 2024 (at paras 11-12) we advised 'that the colours [terracotta] proposed for the Tower exacerbate rather than mitigate the harm to the setting of the Listed Buildings and the</p> |

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character and appearance of the conservation area.' We explained that '... The warmer colours currently proposed for the Tower conflict with the subtler, cool colours – perhaps more characteristic of northern European light' which we argued blended 'better with the blue/grey colours of the roofscapes of the Park buildings and the luminosity of the sky'.

6. We support the colour (white/grey/blue) proposed in the revised application scheme which addresses our objection to the colour of the original application scheme especially when seen in longer views and in the heritage context (see 'Environmental Statement Addendum' volume 2 view A14 pp. 228-230). We noted that the lower stories would use the terracotta colour which harmonises better with the lower height buildings in the more immediate vicinity.

7. However, we asked in our 6 September 2024 comments (para. 7) for further details, all of which remain outstanding. These include: the colour range, including luminosity, of the proposed cladding; the reflectivity of the GRC panels; how would the panels be expected to weather; and how to be maintained? What options are there for the reflectivity and colour tones of the glazing itself? These points are important in achieving the mitigation of harm sought by the agreed change of colour.

8. In our 6 September 2024 comments (para. 8) we raised the question of the lighting of the building at night. How would light pollution be avoided given the aspirations of the Park to 'dark skies' and the impact on the ecology of the conservation area? This important issue also remains outstanding.

9. We recalled that in September 2024 (para. 9-10) we had sought an enhanced dynamic between the external landscape and the animation of the public spaces indicated within the podium. We were also concerned as to whether the wind-tunnel effect of the present building would be mitigated by the new design: it would diminish the value of the landscape if it wasn't.

10. We would expect to see a traffic management scheme included in a CMP in any consent: the congestion in Hampstead Road is already severe as a result of the HS2 works.

11. We would be happy to undertake further discussion of the developing scheme, as well as review of the up-dated CGIs.

Richard Simpson FSA
Chair RPCAAC

Appendix B Buro Happold CVs



Patrick Little BSc (Hons), MSc, PIEMA

Patrick joined Buro Happold in November 2023 as a Technical Director in the London office. He is a client-focused & solutions-orientated environmental consultant, with over 14 years of consultancy experience, specialising in EIA, environmental planning, and climate change assessment. Patrick brings with him a wealth of knowledge, having previously led the EIA and environmental planning service line at CBRE. At Buro Happold, Patrick leads the team's EIA and environmental planning services in London and the southeast.

Patrick has a proven track record of leading the delivering of high-quality EIAs & other environmental services for sustainable developments on sites with complex environmental and planning constraints across the UK. In addition to leading all stages of the EIA process, Patrick is also experienced in advising local planning authorities in an independent EIA peer review capacity, having advised on over 15 such projects in the UK.

Key project information

EIA Advisor to LB Camden (Multiple Projects)

Patrick has advised the London Borough of Camden in an EIA peer review capacity on five projects between 2019 and 2025, including healthcare, research and development, mixed-use, residential, retail, and office developments in the borough.

Patrick's role has included providing technical and strategic EIA advice; reviewing EIA scoping reports and preparing output reports to inform the LPA's scoping opinion; reviewing the ES, including incorporating responses from statutory consultees, advising on appropriate conditions to secure necessary mitigation measures, and preparing a list of clarifications and Regulation 25 requests; and reviewing ES addenda.

EIA Advisor to LB Lambeth (Multiple Projects)

Patrick advised the London Borough of Lambeth in an EIA peer review capacity on 10 projects between 2016 and 2023, including mixed-use, residential, commercial, healthcare, and tourism and leisure developments in the borough.

Patrick's role included providing technical and strategic EIA advice; reviewing EIA scoping reports and preparing output reports to inform the LPA's scoping opinion; reviewing the ES, including incorporating responses from statutory consultees, advising on appropriate conditions to secure necessary mitigation measures, and preparing a list of clarifications and Regulation 25 requests; reviewing ES addenda; and attending planning committee meetings. In some instances, Patrick also assembled and managed a multidisciplinary team of consultants to provide technical reviews and advice to the LPA in instances where statutory consultees were not able to provide comprehensive coverage of the technical topics being assessed.

EIA Advisor to Cannock Chase District Council (Land North of Wyrley Common)

Patrick advised CCDC in an EIA peer review capacity on a proposed outdoor go karting facility project. Patrick's role included providing technical EIA advice and reviewing the ES.

Patrick Little
Buro Happold Limited
Level 5-8, The Featherstone Building
66 City Road
London, EC1Y 2AL
UK

T: +44 (0)207 927 9700

F: +44 (0)870 787 4145

Email: [Click here to enter text.](#)