

Director of Economy, Regeneration and Investment
Regeneration and Planning
London Borough of Camden
5 Pancras Square
London
N1C 4AG

FAO: Sam Fitzpatrick

14 April 2025

Our Ref: GBR/EMOU/AME/U0016297

Dear Sir,

105-121 Judd Street, WC1H 9NE
Section 73 of the Town and Country Planning Act (1990) (as amended)
Application for Amendments Under Section 73

We write on behalf of our client, 105 Judd Street Limited ("the Applicant"), to apply for a minor-material amendment under Section 73 of the Town and Country Planning Act (1990) to planning permission reference 2022/1817/P dated 10 May 2023 ("the Original Planning Permission").

The proposed description of development is as follows:

"Application under S73 of the Town and Country Planning Act 1990 (as amended) to allow the variation of Condition 2 (Approved Drawings) and Condition 20 (Fire Safety) of planning permission ref. 2022/1817/P dated 10 May 2023 to allow for the following amendments:

- i) Provision of new louvres in existing openings at lower ground, ground and first floor levels;
- ii) Infill of existing windows to south elevation;
- iii) Provision of extended bridge link over existing lightwell to Thanet Street;
- iv) Design and massing amendments to plant enclosure at roof level;
- v) Extension of southwest second stair core;
- vi) Provision of five extract flues at roof level;
- vii) New main entrance doors to north east corner with addition of accessible ramp and amendments to permitted steps;
- viii) Works to south and west parapets in brickwork and stone; and
- ix) Adjustment of levels of approved main entrance plinth for alignment with internal levels."

Background

Nos. 105-121 Judd Street ("the Site") is a four storey, plus basement, commercial building located on the north-western side of Judd Street, at its junction with Hastings Street. It has three street frontages, with Thanet Street to the west. The property is a red brick Edwardian building which was completed in two phases. It was originally occupied by the Salvation Army from 1911 to 2000 and then more recently by the Royal National Institute of Blind People (RNIB), before its relocation to alternative premises nearby on Pentonville Road.

The Site is located within the Central London Area, Knowledge Quarter Innovation District, and Bloomsbury Conservation Area. The building is not listed but its frontages make a positive contribution to the conservation area. Bloomsbury is a mixed-use area and there are residential properties in proximity at all four sides of the building, including directly adjacent to the south on Judd Street and Thanet Street.

The long lease of the building was acquired by Ashby Capital and Native Land who, following consultation with Officers at the London Borough of Camden and the local community, in 2022 brought forward a planning application (ref. 2022/1817/P) which proposed to carry out a partial demolition, refurbishment and extension scheme to provide lab enabled commercial accommodation suitable for knowledge quarter users, which was granted planning permission on 10 May 2023. A non-material amendment to the planning permission allowing for a series of design changes was granted on 19 February 2024 (ref. 2023/2979/P).

The planning permission was implemented in Autumn 2024 when cut and carve works started, at which point Section 106 (circa £1.8m) and Community Infrastructure Levy payments (circa £590,000) were made. Demolition works are now largely complete with construction works continuing.

Rationale for Proposed Amendments

Throughout 2024, the Applicant undertook discussions with LifeArc regarding it taking a lease for the entire building upon completion, which at this point is due to be in November 2026.

LifeArc is a British medical research charity, focused on turning scientific discoveries that have the potential to change people's lives into treatments and cures for people with rare diseases and in global health.

LifeArc has been attracted to this building given its previous use by charities, the sustainability aspirations of the development proposals, and its location within the Knowledge Quarter, close to other institutions which it collaborates with. LifeArc is proposing to consolidate operations within this building and provide circa 400 jobs in total, it currently has a smaller office on Tavistock Square.

The permitted scheme was designed on a speculative basis to allow for lab enabled knowledge quarter uses. Now that there is an identified tenant who seeks to take the entire building for office and lab use, it has specific requirements, and it is these which form the proposals as part of this amendment application.

LifeArc intend to provide a split of uses within the building, with back of house facilities in the basement, space for industry events at the ground and part first floor, lab and write up space at part first floor and second floor, with offices at levels three to five.

At the Site, LifeArc would undertake cutting edge research into the discovery and development of new drugs, diagnostics and data solutions that could be used to treat patients living with rare conditions and infectious disease. LifeArc has robust and extensive safety procedures and systems in place to protect laboratory staff, office staff and the local community. All scientific activities are highly regulated to ensure the highest safety standards are maintained. Containment measures are designed to protect both the laboratory personnel and the surrounding community from any potential hazards associated with scientific work.

Of note, significant aspects of the permitted scheme remain generally unchanged, including the extent of the proposed massing, design quality, end of trip facilities, and commitment to improved public realm around the building.

Proposed Amendments

The below is a summary of the changes which are proposed given the specific requirements of the prospective tenant:

- Change in footprint of the rooftop plant enclosure from 440 sqm to 520 sqm, an 18% increase. An increase in height by 0.26m;
- Changes to the detailed design of the plant enclosure to ensure it is bespoke and to increase its visual attractiveness, including a raked design at the north-east corner, fins and piers introduced to the west elevation, and piers introduced to the south elevation;
- New louvers at lower ground, ground and first floor; including 10 integrated upper sash window louvers at first floor, and frosted glazing at three windows, all on Hastings Street and Thanet Street;
- Five flues at rooftop level finished in grey matt stainless steel. These have been located in the centre of the roof and are aligned, to limit visibility from street and private views. They would extend three metres above the height of the plant enclosure;
- A new external access ramp to the re-introduced original main entrance on the corner of Judd Street and Hastings Street;
- Extension to the southwest stair core from third to fifth floor level (this is a general fire requirement, not specific to the prospective tenant); and
- Minor changes to the ground floor treatment at the Thanet Street frontage.

Given the proposals are being brought forward alongside the likely future tenant, an enhanced offer is proposed in terms of affordable workspace and end use jobs training. The 102 sqm of affordable workspace would be located at the first floor, rather than the basement, and be provided at zero rent, rather than at a 50% reduction as currently secured within the Section 106 agreement. It would be made available to charities and SMEs who operate within the life science ecosystem and consist of workstations, break out spaces and a meeting room. An updated affordable workspace plan forms part of this application. With regard end use apprenticeships, two positions are offered for a ten-year period, rather than the five-year period currently secured.

Following additional surveys and design work, the proposed scheme would result in a small reduction in floorspace (51 sqm GIA) compared against the permitted position.

Pre-Application Engagement

These proposals have come forward following significant consultation with both Officers and the local community, during which time the size of the roof top plant enclosure has been reduced and the extent of louvers minimised. The rooftop plant enclosure has been repositioned to limit visibility from street views and the design of the plant screens made more detailed to ensure its attractiveness from points where it is visible. The accompanying Heritage report sets out that the proposed amendments would preserve the character and appearance of the Bloomsbury Conservation Area and the setting of nearby listed buildings compared to the permitted scheme.

To address comments provided in relation to the suitability of this permitted use at the building, technical information covering noise & vibration, odour, and air quality forms part of this submission – confirming that relevant guidelines and policies would be met. An updated Fire Statement which is consistent with the revised design forms part of this submission, which would require the wording of Condition 20 to be updated. The submitted Daylight and Sunlight Assessment Letter of Conformity confirms that GIA conclude that the proposed scheme amendments would not give rise to a noticeable change in daylight

amenity, when assessed against the permitted development. Updated energy modelling to reflect the amendments has also been undertaken.

Overall, these amendments have been designed as sensitively as possible to allow the extended building to be used for a specific lab enabled knowledge quarter use, as permitted under the existing consent. They would meet the requirements of the prospective tenant, a world class medical charity, which would further promote and ensure the success of this designated Knowledge Quarter. This would support an industry which is provided with particular encouragement at paragraph 86a of the National Planning Policy Framework. It is considered that the proposed amendments are consistent with development plan policy and therefore that planning permission should be granted. As part of this, a deed of variation to the Section 106 agreement would be required, including updated versions of the highways and affordable workspace plans.

Proposed Variation to Conditions

The S73 application seeks to update the documents and drawings list referenced under Condition 2, alongside the fire statement referenced under Condition 20. Permitted and proposed drawing references are set out in the drawing schedule which forms part of this application. It is not proposed to revise the description of development as part of this application.

Condition No.	Existing Wording	Proposed Wording
Condition 2	<p>The development hereby permitted shall be carried out in accordance with the approved plans:</p> <p>Drawing Numbers: 4608-ST-07-GA-120, 4608-31-PL-208 A, 4608-31-PL-207A, 4608-31-PL-206A, 4608-31-PL-205A, 4608-07-PR-204B, 4608-07-PR-203B, 4608-07-PR-202B, 4608-07-PR-201B, 4608-07-PR-302A, 4608-07-PR-301A, 4608-07-GA-106A, 4608-07-GA-105A, 4608-07-GA-104A, 4608-07-GA-103A, 4608-07-GA-102A, 4608-07-GA-101A, 4608-07-GA-100A, 4608-07-GA-099A, 4608-07-DM-105A, 4608-07-DM-103A, 4608-07-DM-102A, 4608-07-DM-101A, 4608-07-DM-100A, 4608-07-DM-099A, 4608-07-DM-204A, 4608-07-DM-203A, 4608-07-DM-202A, 4608-07-DM-201A, 4608-07-EX-304A, 4608-07-EX-301A, 4608-07-EX-204A, 4608-07-EX-203A, 4608-07-EX-202A, 4608-07-EX-201A, 4608-07-EX-105A, 4608-07-EX-104A, 4608-07-EX-103A, 4608-07-EX-102A, 4608-07-EX-101A, 4608-07-EX-100A, 4608-07-EX-099A,</p>	<p>The development hereby permitted shall be carried out in accordance with the approved plans:</p> <p>Drawing Numbers: 4608-ST-07-GA-120^D, 4608-31-PL-208 A, 4608-31-PL-207A, 4608-31-PL-206A, 4608-31-PL-205A, 4608-07-PR-204^F, 4608-07-PR-203^G, 4608-07-PR-202^F, 4608-07-PR-201^G, 4608-07-PR-302^E, 4608-07-PR-301^E, 4608-07-GA-106^E, 4608-07-GA-105^E, 4608-07-GA-104^E, 4608-07-GA-103^E, 4608-07-GA-102^E, 4608-07-GA-101^E, 4608-07-GA-100^F, 4608-07-GA-099A, 4608-07-DM-105A, 4608-07-DM-103A, 4608-07-DM-102A, 4608-07-DM-101A, 4608-07-DM-100A, 4608-07-DM-099A, 4608-07-DM-204A, 4608-07-DM-203A, 4608-07-DM-202A, 4608-07-DM-201A, 4608-07-EX-304A, 4608-07-EX-301A, 4608-07-EX-204A, 4608-07-EX-203A, 4608-07-EX-202A, 4608-07-EX-201A, 4608-07-EX-105A, 4608-07-EX-104A, 4608-07-EX-103A, 4608-07-EX-102A, 4608-07-EX-101A, 4608-07-EX-100A, 4608-07-EX-099A, 4608-ST-EX-01-101A, 4608-ST-EX-00-001A, 4608-07-PR-210C, 4608-07-PR-211C</p> <p>Background Papers and Supporting Documents: Flood Risk Assessment & SUDS Strategy Parts 1-7, Phase 1 Land</p>

	<p>4608-ST-EX-01-101A,4608-ST-EX-00-001A</p> <p>Background Papers and Supporting Documents: Flood Risk Assessment & SUDS Strategy Parts 1-7, Phase 1 Land Contamination Report 11121-A2SI-XX-XX-RP-X-0001-00, Townscape, Heritage and Visual Impact Assessment March 2022, Air Quality Assessment 4th March 2022, Statement of Community Involvement April 2022, WLCA 13th April 2022, Energy Statement Parts 1-3 13th April 2022, Circular Economy Statement 13th April 2022, Preliminary Ecological Appraisal February 2022, Urban Greening Factor February 2022, Biodiversity Impact Assessment April 2022, Planning Statement April 2022, Operational Waste Management Strategy March 2022, Transport Statement March 2022, Sustainability Statement 13th April 2022, Structural Planning Report parts 1-9, Noise Assessment March 2022, Fire Statement 3rd March 2022 Draft Employment, Skills and Supply Plan, GIA Daylight & Sunlight Assessment parts 1-2, Gerald Eve cover letter 12th April 2022, Assessment of development proposals which would accord with BRE Daylight Guidance 28/07/2022.</p>	<p>Contamination Report 11121-A2SI-XX-XX-RP-X-0001-00, Townscape, Heritage and Visual Impact Assessment March 2022, Air Quality Assessment April 2025, Statement of Community Involvement April 2022, WLCA 13th April 2022, Energy Statement Parts 1-3 13th April 2022, Circular Economy Statement 13th April 2022, Preliminary Ecological Appraisal February 2022, Urban Greening Factor February 2022, Biodiversity Impact Assessment April 2022, Planning Statement April 2022, Operational Waste Management Strategy March 2022, Transport Statement March 2022, Sustainability Statement 13th April 2022, Structural Planning Report parts 1-9, Noise Assessment April 2025, Fire Statement April 2025 Draft Employment, Skills and Supply Plan, GIA Daylight & Sunlight Assessment parts 1-2, Gerald Eve cover letter 12th April 2022, Assessment of development proposals which would accord with BRE Daylight Guidance 28/07/2022.</p> <p>Townscape, Heritage and Visual Impact Assessment April 2025, Odour Impact Assessment April 2025, Daylight and Sunlight Letter of Conformity and Appendices April 2025, Section 73 Amendments Design Pack April 2025, Statement of Community Involvement April 2025.</p>
Condition 20	<p>The development shall be carried out in accordance with the provisions of the Fire Statement prepared by NDY dated 03/03/2022 unless otherwise approved in writing by the Local Planning Authority.</p>	<p>The development shall be carried out in accordance with the provisions of the Planning Fire Statement prepared by Marshall Fire dated 14 April 2025 unless otherwise approved in writing by the Local Planning Authority.</p>

Policy Framework

For the purposes of Section 38(6) of the Planning & Compulsory Purchase Act 2004, the relevant parts of the development for the Site are:

- The London Plan (2021); and

- The Camden Local Plan (2017)

National policy guidance is produced by central government in the form of the National Planning Policy Framework (NPPF) (2024) which is a material consideration in the determination of this application.

Since the determination of the original planning permission in May 2023, the NPPF has been updated. Additionally, Camden is in the process of preparing a new Local Plan. The Regulation 18 Draft New Camden Local Plan was consulted on from 17 January to 13 March 2024.

In respect of the alterations proposed under this application, changes within the updated documents are not materially relevant. In summary, there are no significant changes to the planning policy position that apply to these revised proposals.

Planning Considerations

Design and Townscape

Policy Context

Policy D3 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design and that proposals should deliver high quality people focused spaces, which are convenient and welcoming with no disabled barriers.

Policy D1 of the Camden Local Plan seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use. The policy lists the characteristics the London Borough of Camden will expect to achieve this policy objective including requiring development to respect local context and character, preserves or enhances the historic environment and is of sustainable and durable construction. Policy D2 of the Camden Local Plan relates to Camden's approach to heritage assets and their settings.

Assessment

In respect of design and townscape, Paragraph 7.28 of the Committee Report for the Original Planning Permission concluded that:

"The overall size, scale and design of the proposed extension is considered to represent a high quality development that would respect the original character and proportions of the host building and its surrounding context whilst providing a contextual and sympathetic contemporary extension above it. The proposals are therefore considered to preserve and enhance the character and appearance of the surrounding conservation area, in accordance with policies D1 and D2 of the Local Plan"

The proposed amendments have been assessed in respect of townscape, built heritage and visual impact and this assessment is contained within the Townscape, Visual Impact and Heritage Statement, prepared by Portico Heritage which forms part of this submission.

The assessment makes the following conclusions:

"The proposed scheme complies with paragraph 214 of the NPPF – it certainly does not lead to 'substantial harm to or total loss of significance of a designated heritage asset'. It also complies with Paragraph 215 for the reasons given above – following and assessment of heritage context we do not believe that the proposals will cause any harm to its significance – as was regarded to be the case in the 2022 consent."

In terms of Camden's Local Plan the proposal fully respects and comply with the LB Camden's' policies in relation to Design (D1) and Heritage (D2). The development is a high-quality design that respects local context and character and will preserve and enhance the character and appearance of the Bloomsbury Conservation Area and the setting of nearby listed buildings.

This report has shown how the significance of surrounding heritage assets, including any contribution made to their setting, has been taken into consideration in the design of the proposed works thus satisfying Camden's Planning Guidance in relation to Design.

The consented proposal was regarded as having a positive effect upon townscape significance and quality, adding visual interest in a sensitive fashion as well as re-purposing a positive contributor in the conservation area. Through careful design and consultation, the amended proposals ensure this positive effect is maintained. We therefore believe that the s.73 proposals comply with legislation, national and local planning policy and guidance for the historic built environment and townscape”.

In accordance with Policy D3 of the London Plan and Policies D1 and D2 of the Camden Local Plan, as per the original planning permission, the proposed development remains of the highest architectural quality. The proposed amendments do not alter the previous assessment of the Original Planning Permission, neither would the amendments be considered to alter the conclusion of the Committee Report and are therefore considered to be acceptable in design, townscape and visual impact terms.

Daylight and Sunlight

Policy Context

London Plan Policy D6 states the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space.

Policy A1 of the Camden Local Plan sets out how the Council will manage the impact of development to protect the quality of life of occupiers and neighbours. The policy states that planning permission will be granted unless it causes unacceptable harm to residential amenity. To protect residential amenity, the Council will consider a variety of factors including sunlight, daylight and overshadowing.

Assessment

In respect of daylight and sunlight, Paragraph 8.31 of the Committee Report for the Original Planning Permission concluded that:

“...officers note that there would be some impact on the amenity of neighbouring residents to the east and west of the site in terms of loss of daylight. However, these impacts are considered to be within the limits of acceptability and would ensure residents continue to receive sufficient levels of daylight to their properties. It is also important to note that compliance with BRE guidance is not mandatory and a degree of flexibility often needs to be applied when assessing applications for developments in a dense urban environment such as this. Whilst the proposed building would alter the outlook from these properties, this impact is not harmful, and the proposals are not considered to cause unacceptable harm in terms of increased overlooking or noise disturbance subject to the suggested conditions. As such, the proposals are considered to accord with policies A1 and A4 of the Local Plan.”

This application is supported by a Daylight and Sunlight Letter of Conformity prepared by GIA which assesses the potential changes in daylight and sunlight to neighbouring properties as a result of the proposed amendments at roof level.

In line with the BRE guidance and consistent with the daylight and sunlight report dated March 2022 that supported the original planning application, each habitable room was assessed for VSC and NSL as the two daylight assessments, and APSH as the sunlight assessment (considered in the winter and the overall annual rate). In preparing this Letter of Conformity which forms part of this application, GIA has conducted two further sets of analyses. The primary analysis, Existing vs Proposed, examines the daylight and sunlight levels currently experienced by neighbouring properties and how they would change following the implementation of the proposed development.

The second analysis compares the daylight and sunlight levels in the consented vs proposed scenario, assessing the neighbouring properties' light levels with the consented development in place against those with the Proposed Development. This approach aligns with Appendix F2 of the BRE Guidelines, which permits the VSC and APSH of the consented development to be used as alternative benchmarks for evaluating light loss to existing neighbouring windows.

When comparing the compliance rates of the proposed development with those of the consented development, both schemes remain fully compliant with BRE Guidelines in relation to sunlight. For daylight, the No Sky Line ("NSL") compliance remains at 71% for both scenarios and to Vertical Sky Component ("VSC"), the proposed development achieves a compliance rate of 74%, compared to 79% for the consented development.

Out of the 13 properties assessed, 11 properties comply with BRE recommendations under both the proposed and consented development scenarios. The two properties that fall short of BRE guidance are Thanet House and Sinclair House. Thanet House and Sinclair House will remain compliant in respect of APSH and will experience the same level of compliance for NSL under both the permitted and proposed scenarios. While some windows within these properties will experience reductions in VSC that are technically considered noticeable under the BRE recommendations, the additional 19 windows which do not meet the recommendations for VSC, will either see high levels of retained VSC or see very minor effects.

GIA therefore conclude that the results demonstrate that the proposed amendments would perform comparably to the consented development, reflecting the relatively minor massing amendments between the two schemes. Given that the VSC and NSL results remain consistent with those of the permitted scheme, GIA conclude that the proposed scheme amendments would not give rise to a noticeable change in daylight amenity.

The proposed amendments are therefore considered to be in accordance with Policy D6 of the London Plan and Policy A1 of the Camden Local Plan by virtue of not causing unacceptable harm to residential amenity.

Noise and Vibration

Policy Context

London Plan Policy D14 details the ways in which development proposals should manage noise including through avoiding significant adverse noise impacts, mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and separating new noise-sensitive development from major noise sources using distance, screening, layout, orientation, uses and materials. Where it is not possible to achieve separation of noise-sensitive development and noise sources, Policy D14 allows for any potential adverse effects to be controlled and mitigated through applying good acoustic design principles.

At a local level, Camden Local Plan Policy A1 seeks to manage the impact of adverse effects from noise and vibration. Policy A4 of the Camden Local Plan sets out that noise and vibration in developments will be managed, and planning permission will only be granted for noise generating equipment (including plant and machinery) if it can be operated without causing harm to amenity.

Assessment

The S73 application is supported by a Noise and Vibration Assessment prepared by NDY. The report assesses noise levels for proposed building services plant, noise within the internal office and laboratory spaces of the building and the magnitude of existing vibration upon the building. The report also assesses compliance with the planning conditions attached to the Original Planning Permission.

Regarding noise levels for the proposed building services plant, the report confirms that subject to the proposed attenuation, the noise levels are at least 10dB below the existing background noise level during the worst-case night-time period at the closest sensitive receptor locations and therefore is in accordance with London Borough of Camden guidance. The report confirms that the proposed amendments would not impact upon the ability to comply with the requirements of Condition 13 (Plant Equipment and Equipment – Noise Compliance) of the Original Planning Permission.

An assessment has also been taken to assess noise within the internal spaces of the proposed office and laboratory areas. The results demonstrate that with mitigation measures specified within the assessment, internal noise levels would meet the relevant criteria.

Regarding vibration, the results demonstrate that worst-case vibration effects would not exceed the relevant criteria and vibration should therefore not present any significant barrier to vibration-sensitive equipment across the Site.

In noise and vibration terms, it is concluded that the proposed development would protect neighbouring amenity and therefore is in compliance with policies D13 and D14 of the London Plan and Policies A1 and A4 of the Camden Local Plan.

Odour

Policy Context

Policy A1 of Camden's Local Plan sets out that the Council will seek to ensure that the quality-of-life occupiers and neighbours are protected from the impact of development. The relevant factors considered include odour, fumes, and dust.

Assessment

This application is supported by an Odour Impact Assessment, prepared by NDY. The assessment has been undertaken to assess laboratory operation odour emissions in relation to the proposed roof level fume extract fans. The report concludes following modelling that the predicted odour concentrations at the neighbouring receptor locations would be well below established odour benchmarks.

The assessment concludes that the proposed development is considered to be acceptable in terms of odour impacts and is compliant with Policy A1 of the Camden Local Plan.

Air Quality

Policy Context

London Plan Policy SI 1 requires that development proposals do not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits and create unacceptable risk of high levels of exposure to poor air quality. To meet these requirements, development proposals must be at least Air Quality Neutral and design solutions should be used to prevent or minimise increased exposure to existing air pollution.

Camden Local Plan Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough.

Assessment

The application is supported by an Air Quality Assessment, prepared by NDY. The assessment has been undertaken to present the findings of the impact of the proposed fume cupboard exhaust emissions from the fume exhaust flues on the local air quality. The report concludes that the predicted long-term emission impacts at the nearby residential receptor locations from the operation of the laboratory under the identified emission limits have been assessed and the long-term impacts are determined to be 'negligible'. The effects of the facility operations on the local area are considered to be 'insignificant'.

The proposed laboratory fume cupboards at the proposed development are assessed to have a 'negligible' and 'insignificant' impact on local air quality. The proposed development is therefore considered to be acceptable in terms of effects upon air quality in accordance with Policy SI1 of the London Plan and Policy CC4 of the adopted Local Plan.

The Air Quality Assessment that was submitted alongside the original application (ref. 2022/1817/P) included detail on the operational impacts in relation to dispersion modelling of traffic pollutants. For the avoidance of doubt, the operational transport impacts are not subject to change as a result of the amendments proposed under this application.

Fire Safety

Policy Context

London Plan Policy D5 states development proposal should achieve the highest standards of accessible and inclusive design. They should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

London Plan Policy D12 promotes the highest standards of fire safety for all developments. The policy requires development to, inter alia, be designed to incorporate appropriate features which reduce risks from fire, constructed in a way to minimise the spread of fire and provide suitable means for escape. Supporting text at Paragraph 3.12.9 requires all major development to submit a Fire Statement.

Assessment

As a result of the amendments proposed under this application, an updated fire statement is submitted in support of the application. The Planning Fire Statement, prepared by Marshall Fire reviews, the proposed development in the context of the requirements of the London Plan and Planning Gateway One. Marshall Fire conclude that they consider the proposed development to meet Planning Gateway

One and the requirements of the London Plan. In order to regularise the updated fire statement, this S73 application seeks to update Condition 20 to refer to the updated document.

Conclusion

The proposals represent a minor material amendment to the proposals permitted under the original planning permission. The submission of the Section 73 application follows pre-application engagement with the London Borough of Camden in which the principle of the proposed amendments was discussed with Officers. The documentation submitted in support of the S73 confirms that the proposed minor material amendments are acceptable in design and environmental terms.

Amendments to the S106 Agreement

A Deed of Variation to the signed Section 106 agreement is required to capture the amendments proposed under this application. Namely, to update two drawings appended to the S106 agreement to ensure consistency with the approved plans ('Highways Works Plan' and 'Affordable Workspace Provision Plan' as submitted as part of this application on a for information basis). The full details are to be agreed with the London Borough of Camden in due course, along with contact details for the applicant's solicitor.

Application Documentation

In accordance with London Borough of Camden's validation requirements, the following documentation is enclosed alongside this covering letter as part of this S73 application:

- Application Form, prepared by Newmark;
- Community Infrastructure Levy Form, prepared by Newmark;
- Approved and Proposed Drawings, prepared by Stiff + Trevillion;
- Section 73 Amendments Design Pack, prepared by Stiff + Trevillion;
- Townscape, Visual Impact and Heritage Statement, prepared by Portico;
- Noise and Vibration Assessment, prepared by NDY;
- Odour Report, prepared by NDY;
- Statement of Community Involvement, prepared by LCA;
- Energy Statement, prepared by NDY;
- Air Quality Assessment, prepared by GIA;
- Daylight and Sunlight Assessment Letter of Conformity, prepared by GIA;
- Affordable Workspace/Apprenticeships note, prepared by LifeArc; and
- Fire Planning Statement, prepared by Marshall Fire.

The requisite fee of £2,085 (inclusive of the planning portal administration fee of £85), has been paid online via the planning portal. We trust the above and enclosed is sufficient to formally validate this application. If you have any queries, please contact Gary Brook (██████████ / ██████████) or Emma Mounsey (██████████ / ██████████) of this office.

Yours faithfully

A handwritten signature in blue ink that reads "Newmark". The signature is written in a cursive, slightly stylized font.

Newmark



Enc. As above