



Network Building

**Planning Statement**

(FOR OUTLINE PLANNING APPLICATION, RESERVED MATTERS 1  
AND RESERVED MATTERS 2)

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## 1. INTRODUCTION

### *Purpose and structure of the report*

- 1.1 This planning statement has been prepared by DP9 Ltd on behalf of Derwent Valley Property Developments Ltd and LMS Offices ('the Applicant') in support of an Outline Planning Application with layout and appearance reserved, and two Reserved Matters Applications for the development of the Network Building, 95-100 Tottenham Court Road, 76-80 Whitfield Street and 88 Whitfield Street.
- 1.2 The application site occupies the southern half of the block bounded by Tottenham Court Road on the east, Whitfield Street to the west and Howland Street to the south. The existing building is a six-storey office building with retail units at ground level.
- 1.3 The Outline planning application seeks permission for the *"demolition of the existing building and construction of a new building to provide for a maximum of 17275 sqm (GIA) of 'commercial business and service' floorspace (use Class E) along with details of access, scale and landscaping and other works incidental to the application (with details of layout and appearance reserved)."*
- 1.4 The Reserved Matters application 1 (RM01) seeks permission for the *"Details of layout and appearance associated with the erection of an office building (E Class) comprising one basement level, ground floor and eight upper floors and associated cycle parking, servicing and all necessary enabling works."*
- 1.5 The Reserved Matters application 2 (RM02) seeks permission for the *"Details of layout and appearance associated with the erection of a life science building (E Class) comprising one basement level, ground floor and seven upper floors and associated cycle parking, servicing and all necessary enabling works."*
- 1.6 This document will provide an overview of the site and the proposed developments and considers the relevant planning policies and sets out a justification for their development.

1.7 This Planning Statement comprises six sections following this introduction, as follows:

- Section 2: Provides a description of the site and context;
- Section 3: Sets out a summary of the proposed development;
- Section 4: Provides information on the pre-application process;
- Section 5: Sets out the Planning Policy Framework;
- Section 6: Assesses the proposed development against the relevant national and local planning policy;
- Section 7: Sets out the planning benefits associated within the scheme
- Section 8: Sets out the draft heads of terms associated within the development; and
- Section 9: Sets out the conclusions.

***Outline Application***

1.8 The Outline application comprises the three control documents titled, the Parameter Plans, the Development Specification' and the Design Guidelines. The purpose of these documents are as follows:

- The Parameter Plans define the extend of the building using maximum dimensions.
- The Development Specification' sets out a written account of the Parameter Plans and details of the description of the proposed development and the type and quantity of development that could be provided.

- The 'Design Guidelines' sets out the rules, requirements and guidelines that any future reserved matters applications for the development of the building defined in the Parameter Plans would need to comply with.

1.9 The Outline application should be read in conjunction with the following documents submitted:

- Application Forms
- Existing Drawings
- Demolition Drawings
- Parameter Plans
- Development Specification
- Design Guidelines (within the Design and Access Statement)
- Design and Access Statement
- Planning Statement (including social value)
- Tree Survey
- Historic Building Report and Townscape Assessment
- Health Impact Assessment
- Structural Engineering Report
- Plant Noise Assessment
- Air Quality Assessment
- Archaeological Assessment
- Construction Management Plan (and Proforma)
- Transport Assessment (including delivery, servicing and waste)
- Travel Plan
- Sustainability Strategy
- SUDS Statement
- Daylight and Sunlight report
- Access Statement
- Statement of Community Involvement

- 1.10 The Reserved Matters applications details how the reserved matters scheme have evolved, and the application proposal complies with the control documents referred to in paragraph 1.8 submitted as part of the Outline application.
- 1.11 Two Reserved Matters applications have been submitted for the site, one for office use (Class E) and one for life science use (Class E).
- 1.12 The Reserved Matters application should be read in conjunction with the following documents:

RM01 (Office)

- Application Form
- CIL Form
- Existing drawings (floor plans, section and elevations)
- Proposed drawings (floor plans, section and elevations)
- Design and Access Statement
- Planning Statement
- Access Statement
- Heritage Statement and Townscape Visual Impact Assessment Compliance Statement
- Archaeology Assessment
- Plant Noise Assessment
- Air Quality Lab Emissions Study
- Transport Compliance Statement
- Delivery and Servicing Waste Management Plan
- Sustainability Statement
- Energy Statement
- Structural Engineering and Basement Impact Report
- Health Impact Assessment Compliance Statement
- Daylight and Sunlight Compliance Statement

RM02 (Life Science)

- Application Form
- CIL Form
- Existing drawings (floor plans, section and elevations)
- Proposed drawings (floor plans, section and elevations)
- Design and Access Statement
- Planning Statement
- Access Statement
- Heritage Statement and Townscape Visual Impact Assessment  
Compliance Statement
- Archaeology Assessment
- Lab Emissions Study
- Plant Noise Assessment
- Air quality Assessment
- Transport Compliance Statement
- Delivery and Servicing Waste Management Plan
- Sustainability Statement
- Energy Statement
- Structural Engineering and Basement Impact Report
- Health Impact Assessment Compliance Statement
- Daylight and Sunlight Compliance Statement

***Objectives of the Outline Planning Application***

1.13 The decision to make an outline application is based on the Applicant's aspiration to incorporate life sciences within the building. At this current time, the life science market is relatively unproven and there are no discernible list of tenants that require a life science building. This is different to the more established office market within London. The Applicant is therefore seeking flexibility if it is the case that there is no apparent life science tenant at the

time the building is bought forward (subject to planning permission being granted). In light of this, there are two Reserved Matters Applications that are being submitted in parallel for the same site, one for an office scheme and one for a life science scheme. This is possible due to the fact that both the office and life science fall within the same 'use class'. The permissions would establish the key principles whilst ensuring as much flexibility as possible in order to create a building which meets the requirements of both office and lab tenants.

- 1.14 The intention has been to provide as much detail as part of the outline application as possible. The Outline application establishes the parameters of a building required to deliver approximately a maximum GIA of 17,796sqm and a minimum of GIA of approximately 16,072sqm. Due to the differences between an office and life science building, the outline application reserves layout and appearance. All other details of use, scale, massing, access, landscaping, Sustainability Targets, Foul Sewage/Sustainable Drainage, Daylight and Sunlight, Townscape and Visual Impacts and public realm is provided within the Outline Application.

#### ***Objectives of Reserved Matters Application***

- 1.15 Two separate Reserved Matters applications have been submitted based on the maximum parameters for the site. The reserved matters provides further details associated with the layout and appearance of both an office building and life science building. At the time, the building is bought forward, both reserved matters schemes will meet the requirements of a potential life science tenant and an office tenant and will allow for a swift response in delivering a new building within a defined framework.

#### ***Tottenham Mews***

- 1.16 A separate full application has been submitted for the redevelopment of 14-19 Tottenham Mews. Within Camden, under planning policy H2, there is a requirement to provide residential as part of non-residential developments



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above 200sqm. The site at Tottenham Mews is the off-site housing site and seeks permission for 23 residential (affordable housing) dwellings. This application will be linked via a section 106 agreement.

## 2. DESCRIPTION, DESIGNATIONS AND PLANNING HISTORY

- 2.1. The site was constructed in the 1950s and comprises a purpose-built office building of part 4/part 6 storeys with basement, with retail units at ground floor along Tottenham Court Road. The building is located between the junctions of Tottenham Court Road, Howland Street and Whitfield Street. A small mews, Cypress Place, runs through the centre of the site, linking Howland Street with Maple Street to the north. The building footprint is a C shape, and there is a small courtyard in the centre of the site within which are located several car parking spaces and refuse storage, accessed from Cypress Place.
- 2.2. The building immediately to the north is nos. 101-107 Tottenham Court Road (TCR), which was refurbished following the grant of planning permission in 2004 (ref: PSX0104726) with an extension of the commercial floorspace at the rear and provision of 7 residential units at 88 Whitfield Street. These units are dual aspect and overlook the central courtyard between 101-107 TCR and the Network Building.
- 2.3. The site is not within a conservation area but is immediately adjacent to Bloomsbury Conservation Area, Fitzroy Square Conservation Area and Charlotte Street Conservation Area. East Marylebone Conservation Area is located 240 metres south west of the site whilst Harley Street Conservation Area and Regent's Park Conservation Area are approximately 400 and 500 metres from the site respectively. The Grade II listed BT Tower is located 150 metres west of the site.
- 2.4. The site has a PTAL (Public Transport Accessibility Level) rating of 6b, the highest possible rating. Godge Street underground station is 300m to the south and Warren Street underground station is 450m to the north. There are numerous bus stops in close proximity along Tottenham Court Road.

### ***Surrounding Area***

- 2.5. The surrounding area contains a range of built forms and scales with 6-7 storey buildings with retail at ground floor facing on to Tottenham Court Road and other large office buildings to the south and north. The 3 storey Carpenter's Arms public house is located on the southern side of Howland Street, but the majority of surrounding buildings are between 5-7 storeys in height.
- 2.6. The site is not located in or adjacent to a conservation area, nor in close proximity to any listed buildings. The majority of the site (the eastern end) lies within the Strategic Viewing Corridor of View 2B.1 Parliament Hill to Palace of Westminster.

#### ***Site Designations***

- 2.7. Within current policy, the site is located within the Central London Activities Zone, and the Tottenham Court Road side of the building is within a Central London Frontage. The site is also within the Fitzrovia Area Action Plan (2014) (FAAP).
- 2.8. The site is designated within the FAAP for business uses. The designation states:  
*"The priority for the Network Building is to retain business uses and to provide public open space, whilst retaining the Cypress Place mews which runs through the centre of the site. Redevelopment could potentially provide around 5,500sqm of additional floorspace, subject to complying with the following development principles..."*
- 2.9. The site is also identified in the draft Site Allocation Document (2019) within policy IDS1 and is allocated for *"office and retail led development that also retains and adds to existing permanent self-contained housing."*

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***Planning History***

- 2.10. The site has a limited planning history, which primarily relates to the installation of plant and air handling equipment. There are several planning permissions for improvements to the retail units along Tottenham Court Road and the office entrance for no. 97 (ref: 2011/3716/P).

### 3. THE PROPOSED DEVELOPMENT

#### *Outline Planning Application*

- 3.1. In summary, this application seeks Outline planning permission for the *“Demolition of the existing building and construction of a new building to provide for a maximum of 17275 sqm (GIA) of E class use floorspace along with details of access, scale and landscaping and other works incidental to the application (layout and appearance reserved).”*
- 3.2. The brief for the proposed development is as follows:
- A target of approximately 17,000sqm GIA of E Class Use;
  - Large and flexible floorplates suitable for office and life science;
  - Creation of a high-quality new building on a prominent corner site;
  - Increasing public realm and connectivity;
  - Significant improvements to the quality of the public realm including the widening of pavements, connection of busy footways, planting of new trees and ecologically beneficial landscaping.
  - A highly sustainable building and ecologically responsible building;
  - Increasing the extent of active street frontage particularly along Howland Street and Whitfield Street;
  - A building of a minimum of 16,072sqm;
  - A maximum height of 32.28 metres above ground.
- 3.3. Due to the nature of the different office and life science uses, layout and appearance are reserved. A full description of the proposed development is set out in the Design and Access Statement and a summary is presented below.
- 3.4. The vision for the site is to provide a high-quality sustainable development of exemplary design which complements and integrates with the surrounding context; whilst meeting the objectives of the Camden Local Plan (2017) and London Plan (2016).

- 3.5. This section should be read in conjunction with the proposed applications and the design and access.

***The parameters of the proposed development***

- 3.6. The 'Development Specification' sets out a 'written account' of the 'Parameter Plans' and details the description of the development and the type and quantity of development that could be provided. A brief summary is also provided below.
- 3.7. The proposed development is for a sustainable, high quality office/ life science building. The parameters allow to flexibility for a future tenant to create a floorplate and internal layout that best meets their needs.
- 3.8. The Parameter Plans define the maximum extent of the development (the maximum development zone). In summary, the proposed development will provide a maximum of 20,001 sqm GEA and rise to a maximum height of 60.14m AOD. A minimum building volume has also been established based on the minimum NIA total target required, which generates a minimum GEA of 17,930 sqm GEA.
- 3.9. The maximum above ground development zone has been informed by the need to accommodate a viable floorplate suitable for office and life science. As part of the final detailed design, it will be possible for the proposed building to sit anywhere within the maximum above ground development zone.
- 3.10. Principal pedestrian access to the Class E(g) use will be provided from mid-way along the Howland Street frontage, while a secondary access will be provided from Whitfield Street. Pedestrian access to the Class E(a)(b) retail use will be provided from Tottenham Court Road. Pedestrian access will also be provided to the rear from Cypress Place, however, it will be limited to servicing, waste

and operational access. Cyclist access will be provided from Whitfield Street at the northern end of the site frontage.

- 3.11. Vehicle access will be provided to the rear of the site via Cypress Place; this will comprise access for servicing, waste collection, and disabled car parking access.

### ***Design Guidelines***

- 3.12. The Design Guidelines establish the rules and requirements that any future applications for approval of 'reserved matters would need to comply with (i.e. RM01 and RM02).
- 3.13. 10 guidelines are provided and submitted for approval. This section provides a summary of the design aspirations for the proposed development based on the rules set out in the design guidelines.
- 3.14. The objective of the design of the proposed development is to design a building that will be responsive to its context and characterised by excellence in sustainable design. The building will represent a coherent addition to the streetscape along Howland Street and Whitfield Street.
- 3.15. The final building must conform with the maximum parameter volume however there is flexibility for a future tenant to influence the final form of the building at the reserved matters stage. The design guidelines sets the relationship of the building with the Parliament Hill Viewing Corridor and identifies the maximum allowable scenario in terms of encroachment for any of the Reserved Matters proposal.
- 3.16. The Design Guidelines specify that the public realm proposal define what key improvements will part of both Reserved Matters applications, with no scope of variation accounted for.

- 3.17. The visual impact of the proposed development has been assessed in key views, including a number of London Management Framework views and in relation to local townscape and designated heritage assets. This assessment has demonstrated that the proposed development will generally enhance local townscape, through the provision of a development that better relates to the surrounding character and will be a coherent addition to Tottenham Court Road, Howland and Whitfield Street.

#### *Sustainability*

- 3.18. The Outline planning application is supported by a Sustainability Statement. The environmental considerations are a key focus of the development considered from the outset of the design with a holistic approach to the development to ensure and result in an excellent energy and low carbon performance and a future-proofed asset for decades to come.
- 3.19. The Applicant is part of the Derwent London PLC Group which sets itself apart from other businesses by considering sustainability as intrinsic for delivering and managing developments. They recognise that their activities are responsible, both directly and indirectly, for a variety of environmental, social and economic benefits and impacts. They are committed to maximising the positive impacts their business has on the environment and local communities through the continuous improvement of their performance and through the responsible design, delivery and operation of their assets.
- 3.20. The application has incorporated sustainable design and construction principles from the outset, ensuring alignment with the Greater London Authority and Local Planning requirements and demonstrating best practice across the breadth of sustainability.
- 3.21. There are a range of potential certifications that seek to demonstrate a building's sustainability credentials at design stage. The proposals will demonstrate compliance against the latest BREEAM 2018 standards to target



an Excellent rating and target a minimum of 3 BREEAM water efficiency credits via water efficient sanitaryware fittings and plumbing. Pre-assessment reports will be prepared for each RM application based on early design stage engagement to demonstrate a strategy for achieving an Excellent rating.

3.22. The sustainability statement submitted alongside sets out the key aspirations for the development and provides confirmation that the development has embedded best practice design and construction principles within the proposals which can be summarised as follows:

- Carbon efficient development that considers whole life cycle carbon emissions with the aspiration to minimise energy demands and exceed minimum policy requirements.
- Application of the energy hierarchy, best practice industry standards for fabric performance alongside the incorporation of zero carbon technologies.
- Designed for climate resilience and UHI mitigation, embedding mitigation measures to ensure a future proofed development.
- Significantly enhances the proposals green infrastructure through intensive and extensive green roof design and soft landscaping.
- Application of principles of circularity to optimise material efficiency, future flexibility and adaptation and minimising waste on site.
- Use of low toxicity, healthy, and sustainably sourced material to ensure user wellbeing and contribute to improving internal air quality.
- Healthy and comfortable internal environments for occupant wellbeing and satisfaction, placing the user front and centre to enhance experiences of the development.

#### ***RM01 (Office)***

3.23. The RM01 seeks permission for “*details of layout and appearance associated with the erection of an office building (E Class, g i) comprising one basement*

*level, ground floor and eight upper floors and associated cycle parking, servicing and all necessary enabling works.”*

3.24. The application still seeks permission for class E but specifically relates to office use. Provided below are the details that were not submitted within the outline application;

- Layout
- Appearance

3.25. The proposed office scheme comprises the following:

- A Ground plus 8 storeys and a basement level;
- High quality retail for the sale of goods E(a) and/or food & drink E(b) facing Tottenham Court Road to the East and Howland Street to the South;
- Class E-g(i) Office use across all floors, with two high quality retail units on Tottenham Court Road;
- Centralised double height reception with flexible and adaptable adjoining spaces;
- Retention of an office entrance on Whitfield Street serving Ground Floor (and associated) office units;
- Highly flexible office floor plates, easily adaptable to allow for changing work practices;
- Terraces on Level 08 and 09, providing a shared amenity for all tenants at roof level;
- Cyclist facilities in basement; and
- ‘Dynamic’ use of office space encouraged at street level in corner of Whitfield Street and Howland street.

3.26. The massing of the proposed office scheme in RM01 fits within the maximum envelope of the Outline Application. All plant equipment at high level sits below the plant enclosure.

- 3.27. The design of the Whitfield façade of RM01 is different to RM02 due to the use requirements of the building. Within RM01, all facade bays to ground floor (Whitfield Street elevation) to have glazing (curtain walling system) with pre-cast concrete vertical piers on either side of glazed bay.
- 3.28. On level 09 there is a roof terrace proposed to provide shared amenity space for building tenants, creating the opportunity for significant greening with clear benefits for the building's sustainability and wellness credentials. Outdoor built-in seating combined with landscape proposals create a unique outdoor space which can be used as an extension of the workspace. A curved glazed facade to a recessed courtyard provides a garden enclosure making the terrace more suitable for outdoor working. The access to the Level 9 terrace will be via the Level 8 core, through an external courtyard, which will include a staircase and a platform lift for wheelchair users, granting level access to the roof terrace.

### ***RM02 (Life Science)***

- 3.29. The RM02 seeks permission for *“Details of layout and appearance associated with the erection of a life science building (E Class) comprising one basement level, ground floor and seven upper floors and associated cycle parking, servicing and all necessary enabling works.”*
- 3.30. As illustrated in the supporting Design and Access Statement, the building has been designed to accommodate a wide variety of life science tenants at different stages of growth from early start-ups that could rent a single bench in a communal incubator laboratory all the way to large companies that could lease the whole building. This flexibility also provides an opportunity for the building to accommodate a whole ecosystem of life science companies that may consist of a large anchor tenant together with wide range of company types and sizes representing the core industry as well as support services.

3.31. The application still seeks permission for class E but specifically relates to life science use (Class E g ii). The proposed life science scheme comprises the following:

- The proposed scheme is comprised of ground floor plus 7 storeys and a basement level.
- High quality retail facing Tottenham Court Road to the East and Howland Street to the South
- Class E-g(ii) research & development of products or processes on floors 02 to 06, with Class E-g(i) office use on ground, first and 7th floors; two high quality retail units on Tottenham Court Road
- Centralised double height reception with flexible and adaptable adjoining spaces.
- Retention of an office entrance on Whitfield Street serving Ground Floor (and associated) office units
- Flexible wet-lab-enabled floorplates(L2-L6)
- Terrace on Level 07
- Cyclist facilities in basement
- 'Dynamic' use of office space encouraged at street level in corner of Whitfield Street and Howland Street

3.32. The massing of the proposed life science fits within the maximum envelope of the outline application. With the exception of exhaust flues positioned outside of the viewing corridor, all plant equipment at high level sits below the plant enclosure.

3.33. There is no accessible roof terrace proposed on level 9. At the level 07 terrace, seating combined with landscape proposals create a unique outdoor space which can be used as an extension of the workspace. There are opportunities for significant greening at roof level provide clear benefits for the sustainability and wellness credentials of the building. There is also an allowance for the

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provision of PV panels at roof level, improving the energy efficiency of the proposal.

- 3.34. The floor to floor heights are 4m (higher than the office scheme) which in turn equates to one less floor. There is a variation on the Whitfield façade design for RM02. Additional plant rooms are required to be positioned internally against the Whitfield Street elevation. As a consequence, some facade bays at ground floor will have opaque / back-painted instead of clear glass

## 4. PRE-APPLICATION DISCUSSIONS & CONSULTATION

- 4.1. The proposed development represents the culmination of extensive pre-application discussions with a wide range of stakeholders over a significant period of time. These stakeholders include LBC, the Greater London Authority (GLA), the Environment Agency, local businesses and landowners, local resident's groups and other organisations with an interest in Fitzrovia.
- 4.2. The application is referable to the GLA as it exceeds the relevant thresholds set out in the Town and Country Planning (Mayor of London) Order 2008) as amended). Accordingly, the GLA has been involved in formal pre-application discussions with the Applicant and LBC.

### *Pre-application Discussions*

- 4.3. Formal pre-application discussions have been undertaken with LBC and GLA on the evolving scheme since 2019. The meetings have included discussions on the following matters:
  - Land Use;
  - Height and massing;
  - Townscape and local views;
  - Public Realm
  - Façade and materiality;
  - Viability;
  - Transport and servicing; and
  - Sustainability.
- 4.4. The scheme has been developed in response to these discussions.

### *Meetings with Camden*

- 4.5. Pre-application meetings have been taking place with LBC since January 2019. This has included presentations to the Strategic Panel, the Design Review Panel and standalone meetings with design, planning, transport and sustainability officers. A summary of the consultation is detailed below.

*Land Use & Design*

- 4.6. LBC outlined that in land use terms, the provision of retail, office and/or life science floorspace is supported in line with local policies.
- 4.7. Within the Strategic Panel meeting, Councillors queried the tenant the Applicant had in mind for the office space and outlined that Fitzrovia is the 'knowledge quarter' and whether the tenants the Applicant had in mind would fall into this sector.
- 4.8. Officer queries relating to the lab scheme mainly revolved around how the life science scheme differed from the office scheme, particularly the environmental performance.
- 4.9. From an early stage, Officers at Camden requested that contextual analysis was carried out to provide a more considered justification of the approach to massing and design.
- 4.10. Officers considered that the Tottenham Court Road elevation needed to have a strong retail base which contributes to supporting the retail character of the street and which provides flexibility of retail space and an engaging and characterful edge to the street. Further information was requested on the southern end of Whitfield Street, towards Howland Street and requested that the design response on this elevation must be to enliven the streetscape, from street level upwards.

- 4.11. The building line along Howland Street was discussed in detail and Officers thought a more generous set pavement frontage would be appropriate. Officers confirmed their support for improving the public realm around the site. This was reinforced in the Strategic Panel Feedback where Councillors and Senior Offices outlined their support for increased public realm and infrastructure for the new tenants in the building.

#### *Carbon*

- 4.12. From the outset, the principle of carbon reduction and whole of life carbon assessments have been discussed with Officers at Camden. At an early stage, the Applicant issued a pack of information that gave an understanding of what the carbon implications of the application were and undertook an analysis of the principle of demolition/rebuild of the building vs refurbishment. The Council confirmed that they were happy with the approach taken at pre-application and confirmed that the aim to reduce the embodied carbon to below 500kg/CO<sub>2</sub>/m<sup>2</sup> for the rebuild scenario is noted and welcomed. Further commentary was also provided on what should be provided as part of the application. Please refer to the energy and sustainability strategy which responds to the feedback received.

#### *Design Review Panel*

- 4.13. The Applicant presented the office and life science schemes to the Design Review Panel on 11 September 2020.
- 4.14. Overall, the Panel were 'impressed' with the architectural quality of proposed designs for the Network Building, but suggested refinements that will enhance the design in its setting. The feedback outlined that If the closure of Cypress Place and additional bulk / footprint were justified, the proposed public realm improvements must return significant value to the area. The panel encouraged the design team to consider moving back both the building line and the



recessed entrance to create a more generous relationship with Howland Street. Upper storeys should be set back to respond to the height of the Qube building. The specification of planting and future maintenance of public realm requires further consideration, to ensure high quality public realm is delivered.

4.15. The panel welcomed the relocation of the office entrance to Howland Street and suggested that the curve in the façade line could be more pronounced, to create additional breathing space on the pavement at the threshold.

4.16. The panel were supportive of the proposed materiality and architectural expression, relating the building to high quality neighbours such as the Heal's Building. In particular, it enjoys the asymmetric profile of the pre-cast concrete façade panels.

4.17. The panel noted that landscaping was an integral part of the design and appropriate tree specification is important on Howland Street. The panel encouraged the incorporation of London Plane trees rather than Field Maples, to provide continuity with Tottenham Court Road and the trees further west on Howland Street. The panel also suggested that rain gardens, rather than benches, could be located on the far side of the pavement from the building, at the corner of Howland Street and Whitfield Street, to help provide sustainable drainage capacity.

4.18. Following the design review panel, the Applicant has responded to and incorporated design changes where possible.

#### ***Greater London Authority***

4.19. A meeting was held with the GLA on 02 October 2020. The GLA confirmed that the principle of a redevelopment of the site to provide office/lab-enabled space within the CAZ is supported in principle.

- 4.20. The increase in both quantity and quality of public realm, including the setback on the ground floor, was considered a significant benefit of the scheme.
- 4.21. The GLA noted that the proposals would result in a slight increase in height compared to the existing building, but the proposed height and massing of the building would appear to sit comfortably in its context and is supported. The GLA supported the location of the ground floor uses and noted that these uses were likely to significantly improve the street-level experience around the site. Integration of furniture into the ground floor facade is a welcome addition and is supported.
- 4.22. The GLA were supportive of the facade design and materials palette which were considered restrained and of a high-quality, reflecting the status of the building and site, and are therefore supported.
- 4.23. The GLA officers were satisfied that the applicant has sought to mitigate the impacts of the overruns with both development options. Based on the plans provided, Officers did not consider that there would be harm to strategic views caused by either option (office/life science). This encroachment to the viewing corridor would need to be fully demonstrated in a planning application.
- 4.24. The Applicant was recommended to submit a completed Carbon Emissions Reporting spreadsheet alongside the application to confirm the anticipated carbon performance of the development and should clearly set out the carbon emission factors they are proposing to use in their energy assessment.

### ***Consultation***

- 4.25. The objectives of the consultation were to ensure that local residents, community groups, interested parties and elected representatives were made aware of the emerging proposals and had an opportunity to participate in shaping the plans. The Applicant therefore implemented a comprehensive

programme of community engagement which began in July 2020 and included the following:

- Digital Consultation Website — A digital website was created and has been live since 5<sup>th</sup> October featuring information about the scheme, exhibition boards to download and a survey designed to gather feedback and comments on the proposals.
- Engagement with locally elected representatives — From the outset, the Applicant sought to engage with the site’s Ward Councillors from Camden City Council as well as the Cabinet Member for Investing in Communities, Culture and an Inclusive Economy
- Engagement with community groups and local stakeholders— The Applicant sought to engage with local community groups throughout the process and have offered an initial briefing and a further briefing to groups such as The Charlotte Street Association, The Fitzrovia Partnership BID, Bloomsbury Conservation Area Advisory Committee, Fitzrovia Neighbourhood Association and the Bloomsbury Association.
- Direct liaison with residents and businesses — The Applicant ensured that members of the project team were able to discuss the plan with residents and businesses who wished to be involved in the application process undertaking targeted hand delivered letter to gather feedback by directing people to the online consultation. The Applicant also engaged with members of its Community Fund throughout the process ensuring they were informed and had the opportunity to provide comment.

4.26. Full details of the pre-application consultation process and responses received are included within the Statement of Community Involvement (SCI) prepared by Concilio which accompanies the planning application

## 5. PLANNING POLICY FRAMEWORK AND OVERVIEW

- 8.1. This section provides a brief summary of the key planning policies relevant to the site and its redevelopment. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level there is both planning policy and guidance which combine to provide the framework for consideration of the proposed development. The key planning policy documents taken into account at this stage and referred to in this planning statement include those listed below
- 8.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless other material considerations indicate otherwise.
- 8.3. The proposed development should be considered against relevant policies contained in the current adopted Development Plan for Camden comprising of the following planning policy documents:
- London Plan (“LP”) (2016, as amended in January 2017)
  - Camden Local Plan (“CLP”) (2017)
  - Fitzrovia Area Action Plan (2014)

### ***Other Material Considerations***

#### *The NPPF*

- 8.4. The replacement NPPF was published in February 2019, and establishes the overarching principles of the planning system, including the requirement of the system to ‘drive and support development.’ The NPPF retains the main principles of the previous version and should be read as a whole.
- 8.5. Paragraph 11 confirms that at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 confirms that: - for decision taking, this means;

*c) approving development proposals that accord with an up to date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless: -*

*i) the application of policies in this framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.”*

8.6. Paragraph 12 confirms that: *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up to date development plan... permission should not usually be granted. Local authorities may take decisions that depart from an up to date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”*

8.7. Chapter 4 of the NPPF relates to decision making. Paragraph 38 states that: - *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permissions in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible.”*

8.8. The NPPF introduces a new section on making effective use of land. This states that planning policies and decisions should promote an effective use of land in

meeting the need for new homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

- 8.9. Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account identified needs, market conditions, the availability of infrastructure, the desirability of preserving an areas character or promoting regeneration and change, and the importance of securing well designed, attractive and healthy places.
- 8.10. Paragraph 124 states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps to make development acceptable to communities.
- 8.11. Paragraph 127 provides criteria for policies and decisions to ensure developments function well, have good architectures, are sympathetic to local character and history, establish a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe inclusive and accessible.
- 8.12. The NPPF sets out a range of measures to promote healthy and safe communities, including open space and recreation; to promote sustainable transport, and achieve well designed places. Applicants are advised to work closely with the community, (paragraph 128) and local authorities should make appropriate use of processes for improving design, including design advice and reviews, including the recommendations of design review panels. (paragraph 129)
- 8.13. Paragraph 130 states that, inter alia: -  
*“Planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and*

*quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to development.”*

- 8.14. Section 16 of the NPPF relates to conserving and enhancing the historic environment. This updates the previous NPPF, but largely restates the well-established principles set out in the previous version and by subsequent legal decisions. In summary, paragraph 193 restates the general principle that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be) This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

*Draft New London Plan*

- 8.15. The New London Plan was initially published for consultation on 1st December 2017, and minor suggested changes published in July 2018. The draft new London Plan was considered at an Examination between January and May 2019 and the panel of inspectors issued their report on 8 October 2019. The Mayor released an Intended to Publish London Plan on 9 December 2019. The SoS issued a letter on 13 March 2020 directing that the Mayor cannot publish the new London Plan until he has incorporated Directions set out by the SoS. Due to the advanced stage of the draft new London Plan it is a material consideration of some weight; once published it will become part of the Development Plan.

*Local Planning Policy: Camden Local Plan (2017)*

- 8.16. At the local level, Camden's Local Plan (2017) was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

*Draft Site Allocations DPD*

- 8.17. Following the adoption of the Local Plan in 2017, Camden is reviewing the Sites Allocations Document. This document sets out the Council's approach to future development on key sites across the borough. Once adopted this Plan will replace policies in the 2013 Site Allocations Plan. It will be used alongside other policies in Camden's Development Plan to assess development proposals on key sites and areas. Consultation on the draft Site Allocations Local Plan took place between early 2020. Camden is currently preparing a statement setting out information about the consultation. This statement will be updated and published at each stage of the plan-making process and submitted to the Inspector for consideration as part of the examination of the Plan. At the time of writing this allocations document holds little weight in the determination of the planning application.

***Supplementary Planning Guidance and Supplementary Planning Documents***

- 8.18. Supplementary Planning Guidance and Documents (SPGs and SPDs) are also material planning considerations. Relevant SPDs and SPGs are noted below.

*Mayoral SPGs and SPDs:*

- 8.19. Supplementary Planning Guidance and Documents (SPGs and SPDs) are also material planning considerations. Relevant SPDs and SPGs are noted below.
- The Mayor's Air Quality Strategy (2010);
  - The Mayor's Energy Strategy (February 2010);



- The Mayor's Transport Strategy (May 2010);
- Central Activities Zone (CAZ) SPG (March 2016); and
- Accessible London: Achieving an Inclusive Environment (2014).

### *Local*

8.20. LBC has also prepared a number of supplementary documents to provide guidance on adopted policies. These documents form material considerations but do not form part of the Development Plan. Of relevance to the development are following supplementary planning documents (SPD).

- Camden Planning Guidance - Design (March 2019);
- Camden Planning Guidance - Basements (March 2018);
- Camden Planning Guidance - Interim Housing (March 2019)
- Camden Planning Guidance - Employment Sites and Business Premises (March 2018);
- Camden Planning Guidance 3 (CPG3) - Sustainability (July 2015, updated March 2018);
- Camden Planning Guidance - Energy Efficiency and Adaptation (March 2019);
- Camden Planning Guidance 6 - Amenity (September 2011, updated March 2018);
- Camden Planning Guidance - Public Open Space (March 2018);
- Camden Planning Guidance - Air Quality (March 2019);
- Camden Planning Guidance - Transport (March 2019);
- Camden Planning Guidance - Trees (March 2019);
- Camden Planning Guidance - Developer Contributions (March 2019);
- and;
- Camden Planning Guidance - Water and Flooding (March 2019).

## 6. PLANNING POLICY ASSESSMENT

- 6.1. This section assesses the proposed development against relevant planning policy and planning guidance.

### *Principle of Development*

- 6.2. The principle of the proposed development accords with current and emerging planning policy guidance. National policy, the London Plan and the Local Plan all seek to ensure that development achieves the highest possible intensity of use compatible with the local context in order to deliver a scale of development which makes the most effective and efficient use of land.
- 6.3. Paragraph 7 of the NPPF outlines that *“the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*
- 6.4. Camden Council’s overarching objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for their residents and businesses.
- 6.5. The Council has developed a series of objectives for the Local Plan to achieve its vision. The strategic objectives of the Plan are as follows:
1. Developing new solutions with partners to reduce inequality and improve health and wellbeing;
  2. Creating conditions for and harnessing the benefits of economic growth; and;
  3. Investing in our communities to ensure sustainable neighbourhoods.

- 6.6. The principle of the redevelopment of the site is established within the Fitzrovia Area Action Plan, which identifies the site as an ‘opportunity site’ where development is expected to take place. Development is expected to *“make the maximum reasonable contribution to additional business space and housing whilst respecting the surrounding context and will be required to maintain active shopfronts along Tottenham Court Road. Development should be of a height which does not harm the viewing corridor from Parliament Hill to the Palace of Westminster.”*
- 6.7. The FAAP confirms that the site could potentially provide 5,500sqm of additional floorspace, subject to an appropriate design.
- 6.8. The regeneration proposals for the site, in terms of their mix of uses, architectural quality and the provision of a new commercial building, meets the above policy requirements and will set an excellent benchmark for future developments within Fitzrovia.
- 6.9. The proposed development is considered to achieve sustainable development since it meets all the above key planning principles for redevelopment of the site. The proposal is a mixed-use redevelopment of a brownfield site located in a highly accessible location by public transport in London.
- 6.10. For the reasons outlined above, the principle of the proposed development is consistent with the broad objectives of planning policy and in accordance with the Government’s overarching objectives for sustainable growth. The proposed development is acceptable in principle and should be supported in this location.

### ***Land Use***

*Office (Reserved Matters 1)*

- 6.11. The principle of developing this site to deliver a high-quality office (Use Class E) is well established through all levels of planning policy.
- 6.12. The NPPF (2019) at Chapter 6 seeks to provide policies that contribute towards building a strong, competitive economy. Paragraph 80 states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It is stated that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 6.13. Accordingly, policy 4.2, Offices, of the adopted London Plan (2016) states that at a strategic level, the Mayor will, and other stakeholders and boroughs should, support the management and mixed-use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises. Policy also states that all parties should recognise and address strategic as well as local differences in implementing this policy to meet the distinct needs of central London's office market, by sustaining and developing its unique and dynamic clusters of 'world city' and other specialist functions and business environments. Renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility is also encouraged at the strategic level.
- 6.14. Policy G1 (delivery and location of growth) outlines that Camden will deliver growth by securing high quality development and promoting the most efficient use of land and buildings. Specifically, for office use, Camden is seeking to provide 695,000sqm of office floorspace up 2031. One of the key priorities for delivering growth and harnessing its benefits include *"supporting businesses and job provision by providing or retaining suitable premises to support businesses staying or expanding within Camden."*

- 6.15. The Fitzrovia Area Action Plan (2014) outlines within the site allocation that the *“priority for the Network Building is to retain business uses and to provide public open space, whilst retaining the Cypress Place mews which runs through the centre of the site. Redevelopment could potentially provide around 5,500sqm of additional floorspace, subject to complying with the following development principles.”*
- 6.16. The draft Site Allocation Document Policy ISD1 – Network Building and 88 Whitfield Street states that *“additional office and retail space on this site will help to meet the needs identified by the Camden Local Plan and support Central London functions.”*
- 6.17. The provision of additional office accommodation in this location accords with Policy E1: Economic Development, which states that the Council will direct new office development to Central London and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. The intensification of the site for commercial use also complies with the key objectives in the Fitzrovia Area Action Plan. The proposed scheme (RM01) provides a total of 17,275 (GIA) of office floorspace (an uplift of 8,190sqm which will make a significant contribution towards the target set out in Policy E1.
- 6.18. Policy E2 outlines that the council will encourage the provision of employment premises and sites in the Borough. For existing business sites, the council supports higher intensity redevelopment of premises or sites that are suitable for continued business provided that the level of employment floorspace is increased or at least maintain and where the scheme would increase employment opportunities for local residents, including training and apprenticeships. The proposed development would provide a significant uplift of economic activity, with the office space expecting to accommodate circa

1024 jobs<sup>1</sup> (an uplift of approximately 595 jobs over what currently exists on site) contributing to Camden's overarching objectives within the Local Plan.

*Life Science (Reserved Matters 2)*

- 6.19. Innovation is considered fundamental to the growth of London, encouraging collaboration across different sectors, promoting links between business and providing support for innovative activities and fostering entrepreneurial skills.
- 6.20. London Plan policy E8 outlines that *"Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education providers and other relevant research and innovation organisations should be encouraged."*
- 6.21. The site is located within the CAZ which as set out in the Intend to Publish London Plan paragraph 2.4.7 *"has important clusters in areas such as tech, the creative industries and life sciences, adding to its strengths in the business, professional and financial services sector, arts and culture, health, education and law."*
- 6.22. Within Camden's Local Plan 2017, the terms 'business' and 'employment' are used to refer to offices, **research and development** and light industry (Use Class B1). Policies E1 and E2 as set out in paragraphs 6.17 and 6.18 also apply here.
- 6.23. The principle of life science in this location accords with Policy E1 Economic development which seeks to maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources. The policy goes on to state that Camden will support the development of Camden's health and education sectors and promote the development of the Knowledge

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<sup>1</sup> The existing and proposed jobs have been calculated as set out in the Homes and Communities Agency Employment Density Calculator Second Edition (2015)

Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan.

- 6.24. Policy KQ1 of the draft site allocations document relates to the Knowledge Quarter Innovation District (KQID). The Network building site is located within the identified District set out in figure 3.1 of the draft allocations. Notwithstanding this, it is noted that the proposed uses within the Individual Development Sites allocation does not refer to knowledge quarter uses. Whilst this policy currently holds limited weight in the determination of the planning application, an assessment has been undertaken below.
- 6.25. Draft Policy KQ1 states that *“to ensure the sustainable growth and success of the Knowledge Quarter Innovation District, major proposals for additional employment, research and/or learning floorspace within it must:*
- a. Demonstrate that they have been developed in a collaborative way with other key stakeholders in the wider innovation district and potentially beyond to meet the needs of the knowledge sector;*
  - b. Be supported by evidence that the type of floorspace being provided appropriately reflects current and emerging needs of the knowledge economy and would complement and support other institutions and companies that contribute directly to the success of the innovation district*
  - c. Seek to prioritise the creation of suitable floorspace for priority growth sectors within the district such as life sciences, digital collections and machine learning*
  - d. Provide for a suitable mix of workspace types including business accelerators, start-up and move on spaces*
  - e. Ensure that buildings are designed to support future reconfiguration for different activities and where possible include flexible floorplates, plant room and mechanical and electrical systems that allow a change from offices to laboratories*
  - f. Ensure that at least 20% of additional employment floorspace is affordable workspace*

*g. Ensure development and its occupiers contribute to reducing inequalities and increasing life chances in neighbouring communities and the borough generally through maximising social value at the planning, construction and end user phases, including supporting increased access to jobs, skills training and education opportunities. Social value frameworks should be used to secure commitments to ensure that nobody gets left behind*

*h. Contribute towards the provision of new physical and social infrastructure to support the Knowledge Quarter Innovation District, such as new homes, public realm enhancements and transportation improvements including transforming pedestrian and cyclist movement within, around and across the Euston Road corridor.”*

6.26. Significant research within the UK and America has been undertaken by the Applicant with respect to the integration of life sciences within this building within Camden. This application is seeking to prioritise the creation of suitable floorspace for priority growth sectors within the district for life sciences in accordance with part c of draft policy KQ1.

6.27. The architect of the proposed life science scheme is HOK. HOK’s Science + Technology practice specialises in creating spaces that advance innovative scientific discovery in buildings of every shape and size. By blending technical innovation with design excellence, they produce flexible, sustainable facilities designed from the inside-out and the outside-in. HOK have experience within Camden and were the architects on the Francis Crick Institute. The proposed floorspace has therefore been designed in accordance with parts b to appropriately reflect current and emerging needs of the knowledge economy and complement and support other institutions and companies that contribute directly to the success of the innovation district.

6.28. There is a growing need from the Life Sciences industry for commercial properties that are capable of accommodating laboratory activity, this need is particularly apparent in Central London. The Network building in accordance



with part c and d looks to respond to this demand by providing commercial workspace for the growing knowledge economy within London's prime knowledge cluster, with a particular focus on the Life Sciences sector.

- 6.29. The building's design has been tailored to accommodate the widest possible cross-section of biotech, pharma, med-tech and digital health companies, ranging from those seeking a 100% office style layout to organisations running full laboratory operations at various stages of growth. In accordance with part e of draft policy KQ1 which seeks to *"ensure that buildings are designed to support future reconfiguration for different activities and where possible include flexible floorplates..."*
- 6.30. The Network Building has been 'lab-enabled' to provide modular and flexible 'wet' life sciences laboratories with predefined chemistry capability. It is designed with an inherent flexibility allowing for easy change between uses at a given time, and as market conditions evolve. Emphasis has been placed on the understanding and identification of specific requirements associated with laboratory functions.
- 6.31. Part g of draft policy KQ1 requires that *"development and its occupiers contribute to reducing inequalities and increasing life chances in neighbouring communities and the borough generally through maximising social value at the planning, construction and end user phases, including supporting increased access to jobs, skills training and education opportunities. Social value frameworks should be used to secure commitments to ensure that nobody gets left behind."*
- 6.32. In accordance with part g, the Applicant's aspiration is to enable value creation and develop and maintain strong relationships within the communities in which we operate. They primarily engage with and support the communities their buildings are located within through their Community Fund. The Fund forms part of their ongoing sustainability programme and desire to establish long term relationships with local groups. The Fund aims to support grassroots

projects that will bring benefits to the local community, in particular focusing on increasing and improving employment opportunities for disadvantaged local people, health and wellbeing initiatives, small public space improvements, arts and culture events and educational projects. Starting in 2013 Derwent London committed £250,000 to the Community Fund over a three-year period initially supporting 17 local projects in the Fitzrovia area. Since then the Fund has invested a total of £700,000 into almost 100 projects throughout London with a further £100,000 allocated for the next funding year. To date Community Fund investment in the London Borough of Camden is c.£190,000.

- 6.33. The relationships borne out of the conversations Derwent London have had with recipients of the Community Fund have also paved the way for many of the volunteering opportunities, pro bono work and work experience programmes they have undertaken. Over the years young people from Fitzrovia Youth in Action have spent time with Derwent London as part of their work experience and mentoring programme, and they gave the basement space of Suffolk House to them in order for the space to be set up as a youth led community centre in which their young leaders could develop skills and plan their community projects.
- 6.34. In order to ensure local groups can access the benefits Derwent London buildings can bring to an area we positively engage the local community at the earliest opportunity when they undertake significant development activity. They work with their supply chains to actively search and support local training and employment opportunities. Derwent London recognise the importance of local prosperity by buying and promoting local businesses wherever possible and encouraging their supply chains to do the same. Derwent London also use measurement criteria to ensure that the levels of community engagement and benefits are maximised and that the supply chain remains as committed as they are to operate responsibly.

- 6.35. Derwent London's sustainability framework for development sets out their standards during the design and delivery of our developments. Within this document is a clear breakdown of what they expect at each project stage and, more recently, they have bolstered this to reflect the adoption of the science-based carbon targets, most notably with the introduction of their carbon map. Their commitment to the local area runs through the life cycle of their new development schemes, and it is imperative that their contractors also understand the importance of establishing good community links and engage with the local community from the outset. By way of example the main contractor appointed at their latest development in Camden, 80 Charlotte Street, organised 102 community events and activities.
- 6.36. Derwent London includes comprehensive criteria within their development contracts which set out their expectations and requirements in accordance with the part g of the draft policy. As a London Living Wage accredited employer, they recognise the importance of such issues as fair wages in accordance with the Living Wage Foundation guidelines. Similarly, assurances surrounding the promotion of an inclusive workplace will be sought for the proposed development. Targets will also be set for local employment as part of the proposed development, such as apprenticeships, work experience placements and careers events. 80 Charlotte Street provided 26 new apprentices, 11 work experience placements, 19 careers events attended, and 115 Camden and Islington jobseekers engaged during the construction phase.
- 6.37. The Applicant's aspirations for the local area mirror those of Camden's Renewal Commission; to support an inclusive economy, to support people in their self-development and employment skills, and to take measures to become a net zero carbon business by 2030.

- 6.38. In accordance with part h of the draft policy, the Applicant is bringing forward significant public realm and transport improvements. Significant improvements are being proposed to the quality of the public realm, including the widening of the pavements, which in turn allows inclusion of ecologically beneficial rain gardens improving biodiversity, increasing permeability and connecting footways and planting of new trees. The changes will significantly enhance the experience at ground floor level for the tenants of the building but also other local residents and businesses. The proposal is coming forward as a car free development (except disabled parking) and will result in the removal of 31 existing car parking spaces. The site's public transport facilities combined with the absence of general car parking provision, and cycle parking in excess of policy minimum standards will maximise the sustainability of the site in accordance with local regional and national policy and will promote a sustainable form of development.
- 6.39. The proposed development will enhance London's research facilities and reinforce the geographic focus of Camden as a centre for medical research. The concentration of medical research institutions will create the environment for start-ups and spin-off to thrive, supporting small and medium size enterprises.

*Affordable Workspace*

- 6.40. The London Plan promotes and supports the provision of affordable workspace. It does not, however, specify the percentage quantum of new development that should be affordable workspace, nor the rate at which it should be priced. It is delegated to the local authority to decide on such matters.
- 6.41. London Plan (draft) Policy E3: also promotes and supports the provision of affordable workspace but does not specify the percentage quantum of new development that should be affordable workspace, nor the rate at which it

should be priced. Similarly, to the current London Plan, these decisions are delegated to the local planning authority.

- 6.42. CLP Policy E2 states that ‘higher intensity’ redevelopment, e.g. medium and major scale office-based developments must: *“include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;”* (part f.) The LBC policy position is similar to the London Plan in the respect that it does not specify an explicit quantum of floorspace that is required to be set at affordable rates within their local plan.
- 6.43. Camden Planning Guidance Employment Sites and Business Premises (2018) acts as a planning guidance document, which is supplementary to the Camden Local Plan. Within this document it is stated that LBC will: *“Seek to use planning obligations to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA or gross internal area) or more. The cost per square foot or per workstation that would be considered affordable will vary according to a range of factors such as location, type, quality, etc.”*
- 6.44. The Applicant is proposing 375sqm of affordable workspace to be located offsite at 14-19 Tottenham Mews. Due to the viability of bringing forward both sites together, the proposed is the maximum amount that can be provided.

#### *Residential*

- 6.45. Policy H3 of the CLP outlines that the Council will aim to ensure that existing housing continues to meet the needs of existing and future households by *“resisting development that would involve a net loss of residential floorspace, including any residential floorspace provided.”*
- 6.46. The Fitzrovia Area Action Plan sets forward a target of 200 additional homes by 2025 and requires all identified opportunity sites to provide on-site accommodation in accordance with policy requirements.

- 6.47. The existing 7 private apartments are all assured shorthold tenancy owned by the Applicant. The intention would be to re-provide the existing 7 private residential (converted to affordable) units within the proposed development at 14-19 Tottenham Mews (linked application). There would therefore be no net loss of residential dwellings overall.
- 6.48. Paragraph 21 of the NPPF states that Local Plans should support existing business sectors, taking account of whether they are expanding or contracting, and policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. It stipulates that plans should plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.
- 6.49. As outlined in paragraph 6.17 the provision of additional office accommodation in this location accords with Policy E1: Economic Development, which states that the Council will direct new office development to Central London and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. The intensification of the site for commercial use also complies with the key objectives in the Fitzrovia Area Action Plan.
- 6.50. The residential being provided on Tottenham Mews, provides an opportunity (subject to design) to provide approximately an additional 973 sqm of E Class g (i) (office) floorspace. This equates to circa 64 additional jobs on site contributing to the targets set out in policy E1 which is vital to maintaining and developing Camden's successful economy. The priority therefore should be to encourage additional floorspace to help continue to contribute to the successfulness of the area.
- 6.51. By relocating the residential off site, the Network building would comprise large, clear and efficient floorplates that meet the BCO guidelines and needs

of modern occupiers, particularly in terms of floorplate depths, access to daylight, optimized core to facade distances and flexibility in the subdivision of floors to suit different scales of businesses.

- 6.52. National policy, the London Plan, the Camden Local Plan all seek to ensure that development achieves the highest possible intensity of use compatible with the local context in order to deliver a scale of development which makes the most effective and efficient use of land. Providing solely commercial use within the Network building and relocation of the residential to Tottenham Mews provides the most efficient and effective use of land.
- 6.53. Whilst it is understood that there is already residential on site, there are a number of reasons as to why we believe that the existing residential would be more appropriately located on another site and have considered the criteria set out in policy f to j in policy H2 and policy A1.
- 6.54. Policy A1 outlines that the council seeks to protect the quality of life of occupiers and neighbours. The criteria outlined will be useful in determining the ongoing impacts of providing residential on surrounding neighbours. The following factors/impacts should be considered.
- *visual privacy, outlook;*
  - *sunlight, daylight and overshadowing;*
  - *transport impacts,*
  - *impacts of the construction phase*
  - *noise and vibration levels; and*
  - *microclimate.*
- 6.55. The existing residential does not wholly comply with current day to day space standards. The floor to floor heights of the existing residential (2.9) are less than current guidance recommends. If the existing residential units were re-provided, these would be designed to meet all current London and Camden residential space standards. Currently on site, there are 7, two bedroomed

units. These units will be converted to affordable residential and will be provided in a more appropriate mix/tenure in line with Camden's requirements.

- 6.56. Removing residential from the Network building facilitates more active frontage to Whitfield Street. There would be additional activity and natural surveillance at ground floor. The FAAP identifies Tottenham Court Road as a preferred location for large shops, food, drink and entertainment uses. The FAAP states that new development should provide high specification shop units to the Tottenham Court Road frontage with generous ceiling heights.
- 6.57. Currently there are three different uses on the Network site (retail, office and residential). By relocating the residential on site, this would simplify the existing servicing arrangements, as it will maximise the opportunity to activate Whitfield Street & Howland Street as servicing entrances are via Cypress Place.
- 6.58. Should planning permission be granted for the redevelopment of the Network building and replacement and provision of extra residential on Tottenham Mews it will lessen the construction noise and vibration impacts to the existing residential on site. Whilst this is only a short-term impact, this should be considered in the overall planning balance.
- 6.59. Taking the above into consideration, the relocation of the residential to Tottenham Mews is appropriate and by bringing forward the two sites comprehensively provides a significant and unique opportunity to provide a new wholly commercial development and a residential development site incorporating high quality (grade a) office and/or life science, retail and affordable residential floorspace.

*Mixed Use*



6.60. Policy H2 states that to support the aims of policy H1, where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses.

6.61. In the Central London Area where the site is located, where development involves additional floorspace of more than 200sqm (GIA), Camden will require 50% of all additional floorspace to be self-contained housing. In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:

*a. the character of the development, the site and the area;*

*b. site size, and any constraints on developing the site for a mix of uses;*

*c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;*

*d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and*

*e. whether the development is publicly funded or serves a public purpose.*

*Where housing is required as part of a mix of uses, we will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, they will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.*

6.62. In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:

*f. the need to add to community safety by providing an active street frontage and natural surveillance;*

*g. the extent of any additional floorspace needed for an existing user;*

- h. the impact of a mix of uses on the efficiency and overall quantum of development;*
- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and*
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.*

6.63. Policy H2 will be triggered as the scheme provides additional floorspace greater than 200sqm. The next section provides an assessment of the scheme against policy H2 and why the most appropriate option in this case is to provide the residential required under policy H2 as set out above as an off-site solution. It will then go on to detail the residential provision provided at Tottenham Mews.

*Response to Policy H2*

*l) Where housing is required as part of a mix of uses, Camden will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed*

6.64. There is a strong policy basis for providing office floorspace on this site. The site lies within the Central London Area and benefits from a series of land use designations, all formulated to encourage growth and regeneration.

6.65. The site is located within the Central Activities Zone (CAZ). The CAZ is the vibrant heart and globally iconic core of London. It is one of the world's most attractive and competitive business locations. Policy 2.11 of the London Plan sets out the strategic functions of the CAZ. The Policy outlines that Councils should seek solutions to constraints on office provision imposed by heritage designations, without compromising local environmental quality, including through high quality design to complement the designation.

- 6.66. Intend to Publish Local Plan (2019) Policy SD4 states that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.
- 6.67. Intend to Publish London Plan Policy SD5 states that *“new residential development should not compromise the strategic functions of the CAZ.”* It goes on to state that *“Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in all other areas of the CAZ except: 1) the Vauxhall, Nine Elms, Battersea and Elephant & Castle Opportunity Areas, where offices and other CAZ strategic functions are given equal weight relative to new residential; and 2) wholly residential streets or predominantly residential neighbourhoods (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters).”*
- 6.68. Specifically, in relation to office use, Policy 4.2 of the London Plan outlines that Councils should support the renewal and modernisation of existing office stock in viable locations to improve its quality and flexibility and to seek increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities. Policy 4.2D of the London Plan notes that the scope for the re-use of otherwise surplus large office spaces for smaller units should also be examined.
- 6.69. Policy E1 of the Intend to Publish London Plan aims to promote the improvement to the quality, flexibility and adaptability of office spaces of different sizes. Policy E1 of the Camden Local Plan (CLP) notes that the Council will support businesses of all sizes and maintain a stock of premises that are suitable for a variety of business activities, for firms of different sizes, available on a range of terms and conditions, with differing resources.

- 6.70. The strategic importance of office in this location is clear. There is an opportunity to provide a significant office offer that will ‘support and improve’ the CAZ for its residents and workers. Incorporating additional residential would be contrary to the flexibility that the applicant is seeking in this instance and the site would be less attractive to potential occupiers.
- 6.71. Policy at a national, regional and local level all support economic growth within the Central Activities Zone. The Intend to Publish Local Plan recognises that new residential development should not compromise the strategic function of the CAZ and offices and other functions.
- 6.72. In light of the policy listed, the design team explored the opportunities for residential floorspace onsite at the Network Site as part of the pre-application process. The quantum of residential floorspace explored has been tested against the considerations contained within Policy H2, in particular the impacts of providing residential floorspace on the character of the development, the quantum of residential floorspace required and the compatibility with the existing office uses already on site.
- 6.73. Piercy and Co provided a housing study during pre-application to show where residential floorspace could theoretically be incorporated. Various scenarios were provided including the retention and/ or extension of the existing residential homes on Whitfield Street as well as the option of including new residential floorspace configured laterally on the upper or lower levels. The testing concluded that it was not practically or economically feasible to include on-site residential provision. A summary of the key reasons is included below:
- Any residential on-site at Network would be single aspect due to the depth of the existing and proposed commercial floorplates;
  - Additional cores and service penetrations resulting in a loss of floorspace, impacting on scheme efficiencies, adversely affecting the viability of development.

- Retention of existing residential not feasible due to poor floor to ceiling heights and complexities of 'tying' this into the new commercial development of different floor heights;
- Retention of existing residential not feasible due and outdated fire safety configuration;
- Impacts at basement level by introducing additional residential elements (likely to be further residential required).
- Noise and pollution impacts on residential occupiers where residential homes face onto Tottenham Court Road and Howland Street; and
- Impact on long term investment value of providing residential on top of, or in the midst of, commercial, adversely affecting the viability of development.

6.74. Whilst residential floorspace could theoretically be incorporated on site, it would be considered sub-standard in a high value area. Not only would introducing residential decrease the level of office floorspace provided, but it would compromise the office/ life science floorplate. The principle of this would be a concern for tenants, and it would likely cause amenity issues in terms of any potential service programme for the building.

*i)Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, they will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.*

#### *Principle*

6.75. Considering the economic impacts noted above the delivery of residential floorspace off-site enables greater amount of non-residential floorspace at the Network Building, thereby improving the viability of the development as a whole, which in turn allows for a greater amount of affordable housing to be viably delivered at Tottenham Mews, than would have otherwise been

possible. This principle of ‘additionality’ as a result of optimising the main application site is noted within the Local Plan supporting text at paragraph 3.55.

- 6.76. The Applicant is proposing to provide the residential at 14-19 Tottenham Mews. 23 residential dwellings including 10 homes for Social Rent and 13 homes for Intermediate Rent is proposed. In accordance with Local Plan paragraph 3.56 Tottenham Mews is located in the same ward as the Network Building, being only 500m away. Given the site is located south of the Euston Road where there is typically a scarcity of suitable sites for affordable housing, the close proximity of Tottenham Mews to the Network Building is also considered to weigh favourably when determining the acceptability of off-site provision of housing.
- 6.77. The affordable housing at Tottenham Mews will be constructed, owned and managed by a Registered Provider. A number of affordable partners from the Council’s approved list have been involved in the design of the scheme, including layouts, communal areas etc. Combined, this ensures that the service costs are kept to a minimum, protecting long term affordability for affordable residents.
- 6.78. On balance, the provision of significant number of affordable homes, over and above that which would have been possible as part of the standalone redevelopment of the Network Building, within close proximity to the application site, and which have been designed to a high standard in collaboration with Council Officers and Registered Providers, is considered to justify the provision of off-site residential housing.

#### *Quantum*

- 6.79. Policy H2 will be triggered as the scheme provides additional floorspace greater than 200sqm. As the Network Building and Tottenham Mews will be bought forward together, the required provision of residential has been

calculated for both sites (including market and affordable) under policy H2 and H3 as per Camden's Interim Guidance March 2019 and in accordance with discussions with LBC who confirmed that the housing target is 50% of the total net uplift (residential plus non-residential) across the two nominated sites.

Building	Use	Floorspace		Uplift		
		Existing	Proposed Development (maximum)	Non-resi	Resi	
Network	residential	844	0		-844	
	office	7085	17275	10190		
	retail	1156	521	-635		
Mews	residential	0	2339		2339	
	D1 space	706.34	0	-706.34		
	Office	0	375	375		
				<b>Total non-resi</b>	9223.7	
				<b>Total resi</b>		1495
				<b>TOTAL UPLIFT</b>	10,718.7 <sup>2</sup>	
				<b>Housing target under H2</b>	5359	
				<b>Private Target plus 'lost' floorspace</b>	2679.5 + 844 = 3523	
				<b>Affordable Housing Target</b>		2679.7
				<b>AH Shortfall</b>		340.7

6.80. Across both the Network building and Tottenham Mews, the uplift in floorspace (residential and non-residential) is 10,718 sq. m. 50% of any uplift in floorspace is required to be self-contained housing 5,359sq m (GIA), of which 2,679 sq. m GIA (50%) is to be affordable housing. Finally, the 844 sq. m of existing market residential housing at Whitfield Street must also be included in the total private housing target area. Taking into account, the existing residential, there is requirement to provide 6203sqm overall.

<sup>2</sup> Requirement under policy H2 not including 844

- 6.81. The Development proposes no market housing but includes 2,339 sqm of affordable housing at Tottenham Mews. The shortfall in provision of market housing is, when considered against the delivery of a wholly affordable scheme at Tottenham Mews, considered to be aligned with the Council's housing objectives which prioritise affordable housing over market housing.
- 6.82. There is a very small shortfall in affordable housing floorspace when the target of 2,679 sq. m, is considered against the provision at Tottenham Mews of 2,339 sq. m. A Financial Viability Assessment ("FVA") has been submitted as part of the planning application which demonstrates the Development is providing maximum reasonable amount of affordable housing. An FVA was also submitted to the Council as part of pre-application discussions and which was independently reviewed by the Council's viability consultant who agreed with the overall conclusions. Local Plan policies H2 part i) and H4 part o) both give weight to the specific economics and financial viability of development. Please refer to the planning application submitted in parallel for Tottenham Mews which detail further the split of tenure and discussions held with the Registered provided.

#### *Retail*

- 6.83. London Plan Policy 4.8 supports a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need. It notes that Boroughs should take a proactive approach to planning for retail, including the need to bring forward capacity to secure a sustainable pattern of provision.
- 6.84. Policy E9 of the Intend to Publish London Plan states that "*a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres*" and that Boroughs should



*“secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies.”*

- 6.85. Policy TC1 of the Local Plan 2017 outlined that the Council will focus new shopping and related uses in Camden’s designated growth areas and existing centres, having regard to the level of capacity available in these locations. The policy goes on to states that the Council will seek *“additional provision as part of redevelopment schemes in the growth areas of Tottenham Court Road, Holborn and West Hampstead Interchange.”*
- 6.86. The FAAP identifies Tottenham Court Road as a preferred location for large shops, food, drink and entertainment uses. The FAAP states that new development should provide high specification shop units to the Tottenham Court Road frontage with generous ceiling heights.

*Reserved Matters 1 & Reserved Matters 2*

- 6.87. High Quality Retail for the sale of goods E(a) and/or food & drink E(b) facing Tottenham Court Road to the East and Howland Street to the South is proposed. Ground floor uses (shops, restaurants, cafes and office space) significantly improve the relationship between the building and the street on two important corners facing Tottenham Court Road and Fitzrovia providing an increase of activation along the street of c.26 metres.
- 6.88. The application proposes a reduction of retail area over what exists currently. The reduction would result in a modest reduction in the overall area of retail floorspace proposed, but this would not be noticeable since it relates purely to below ground area which is unlikely to be used as front of house trading area. The slight reduction in retail floorspace will not have a significant impact on the retail function in this location and would continue to support the Central London Frontage Area. The retail provided would be of higher specification

over what currently exists on site in accordance with the objectives of the FAAP.

### **Design**

6.89. This planning statement addresses the land use context of the proposed development, showing how the proposal will meet the land use objectives for the site and complement existing land uses in the area. The Design and Access Statements accompanying the planning application provides an analysis of the constraints and opportunities presented by the site and how the design of the proposed development has evolved and responds to these. It sets out the design objectives, urban design principles and building design principles which have informed the final design of the proposals. Three separate Design and Access Statements accompany this application:

- Outline Design and Access Statement (providing details save for appearance and layout).
- Reserved Matters Design and Access Statement 1 (Office)
- Reserved Matters Design and Access Statement 2 (Life Science)

6.90. The proposed development has been the subject of extensive pre-application discussions with planning and design officers at both LBC, GLA and neighbouring properties and the local community (please refer to SCI) and the design has evolved in response to these discussions.

6.91. Chapter 12 of the NPPF (2019) concerns the achievement of well-designed places. It advises that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.

6.92. Paragraph 131 provides that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

- 6.93. The adopted London Plan (2016) requires all buildings and structures to be of the highest architectural quality, and be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. Buildings, especially tall ones, should not cause unacceptable harm to the amenity of surrounding land and buildings. Buildings should provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces. Buildings should optimise the potential of Sites.
- 6.94. Local Plan policy D1 outlines that the Council will seek to secure high quality design in development. The Council will require that the “*development*”:
- a. respects local context and character;*
  - b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
  - c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
  - d. is of sustainable and durable construction and adaptable to different activities and land uses;*
  - e. comprises details and materials that are of high quality and complement the local character;*
  - f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
  - g. is inclusive and accessible for all;*
  - h. promotes health;*
  - i. is secure and designed to minimise crime and antisocial behaviour;*
  - j. responds to natural features and preserves gardens and other open space;*
  - k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
  - l. incorporates outdoor amenity space;*

- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.”*

*The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.*

6.95. The intention for the Network Building is to create an expressive building with a clear character and identity. In the development of the design a number of specific principles have been established that have informed the design concept for the Network Building:

- Design spaces that encourage creative use and facilitate sharing of knowledge.
- Create a building that is generous to its surroundings and engages meaningfully with public life.
- Use of depth and relief in surfaces to create variation across the facades and encourage dynamic reading of light / shadow.
- Human Focused - use of flowing forms, tactile surfaces and natural materials particularly in situations where there is 1:1 engagement with the building materials
- Expressive detailing allowing enjoyment of the building at close range
- Maximise access to outdoor spaces, landscaping and use of planting as an integral part of the building's composition.

6.96. The proposed facade design on Howland street seeks to remove the existing obstruction of the basement car parking vents at street level and offers this area back to the public footpath. The facade line at ground and first floor therefore would sit slightly back from the established facade line to the West Howland Street, with no obstructions at street level offering a much more generous circulation at street level. The removal of the existing basement car parking vents on Whitfield Street, combined with the new, extended kerb line

will provide more than double the existing pavement width, playing a key role in the strategy to activate the corner junction of Howland and Whitfield Streets.

- 6.97. In the upper floors the building projects out to align with the position of the existing basement vents. This projection falls within the building ownership line and aligns closely with other similar high-level projecting facades on Howland Street such as the rain screen facade of 13 Fitzroy Street.
- 6.98. Significant setback is proposed at ground floor and Level 01 to improve the public realm experience and increase the clear pavement width on Howland Street. The set-back plays a key role when responding to the corner condition of the building, allowing a more comfortable pedestrian flow from Tottenham Court Road and at the corner of Howland Street and Whitfield Street.
- 6.99. The proposal does represent an increase in massing at higher level when compared with that of the existing building, however it retains a street width, height and profile that is comparable to and in keeping with that of the two adjacent blocks to the west. The GLA and the Design review panel were supportive of the increase to the height and massing over the existing building.
- 6.100. The entrance to the main building has been relocated to Howland Street which gives greater identify and character as well as helping to activate the street in accordance with the principles set out in policy D1.
- 6.101. The proposals have been designed by -acclaimed architects Piercy and Co. The building development will:
- Create a building of architectural distinction that will improve the quality of the immediate area and contribute to the architectural richness of Fitzrovia
  - Responds positively to surrounding context as set out in the Design and Access Statements.

- Be of an exceptional design quality shown through the materials and of an architectural expression that would complement the appearance of the area;
- Provide a highly permeable and active ground floor which works with the public realm proposals to transform the Site and its immediate surroundings in terms of permeability, legibility and the quality of the pedestrian environment.
- Provide outdoor amenity space at level 9 for the building tenants creating the opportunity for significant greening with clear benefits for the building's sustainability and wellness credentials, while appreciating the views towards the south and south West. Outdoor built-in seating combined with landscape proposals create a unique outdoor space which can be used as an extension of the workspace.
- Key focus on environmental considerations and which were considered from the outset of the design with a holistic approach to the development to ensure and result in an excellent energy and low carbon performance and a future-proofed asset for decades to come.
- Designed for climate resilience, embedding mitigation measures to ensure a future proofed development.
- Significantly enhances the proposals green infrastructure through intensive and extensive green roof design and soft landscaping.
- Application of principles of circularity to optimise material efficiency, future flexibility and adaptation and minimising waste on site.

#### *Outline Application*

6.102. A full explanation of the design approach that has been adopted is contained within the Design and Access Statement. In summary, the objectives for the design of the proposed development is to create a building that will be responsive to its context and characterised by excellence in sustainable design.

6.103. The outline application provides details of the development but reserves layout and appearance for approval within the Reserved Matters 1 and 2. The Guidelines provide a strong foundation for a significant improvement to the surrounding area. The key principles relating to the design and established within the Design guidelines are:

- To establish the bulk and massing that best responds to the site conditions, allowing a small degree of variation between the two Reserved Matter Applications (guideline 1)
- The building must fit within the dimensions set out in the maximum building extents (guideline 3)
- The Material Palette defines a clear strategy for the use of materials across the building with no scope for variation accounted for (guideline 7)
- Public realm and landscape proposals define what key improvements will be part of both Reserved Matters applications, with no scope of variation accounted for (guideline 9)
- Sustainability strategy adopted reflects the Applicants objectives and is in line with the current London Plan, demonstrating alignment also against the draft New London Plan policy. The key objectives should be upheld in any of the Reserved Matters proposals (guideline 10)

#### ***Reserved Matters 1 (Office)***

6.104. RM01 proposal seeks permission for an expressive, generous and highly sustainable new building providing modern, attractive and flexible office accommodation at the Network Building site with Retail fronting on Tottenham Court Road and Howland Street. The office entrance on Whitfield street will be retained entrance on Whitfield Street serving Ground Floor (and associated) office units. The Whitfield Street entrance is to include a potential self-contained duplex office unit to ensure its use throughout the day.

- 6.105. The proposed scheme is comprised of ground floor plus 8 storeys and a basement level. The massing of the proposed office scheme fits within the maximum envelope of the Outline Application (60.14 at top of the lift overrun and 32.38m height). All plant equipment at high level sits below the plant enclosure.
- 6.106. The majority of the Network Building site is located within protected view from LVMF Assessment Point 2B.1 (Parliament Hill) towards the Palace of Westminster. As set out in the Outline Application, the only roof elements that will sit above the Viewing Corridor plane in the Office Scheme are the lift overruns and the roof terrace balustrade, with all of the plant equipment sitting within the footprint and height of the L08 plant screen. To minimize the footprint of the lift overruns encroaching into the Viewing Corridor, only 3 of the 5 passenger lifts (plus goods lift) terminate at Level 8, with the remaining 2 passenger lifts terminating at Level 7, occupying an area of c. 36 sqm.

***Reserved Matters 2 (Life Science)***

- 6.107. There is a growing need from the Life Sciences industry for commercial properties that are capable of accommodating laboratory activity, this need is particularly apparent in Central London.
- 6.108. The Network building looks to respond to this demand, by providing commercial workspace for the growing knowledge economy within London's prime knowledge cluster, with a particular focus on the Life Sciences sector.
- 6.109. The proposed scheme is comprised of ground floor plus 7 storeys AOD at top of lift overruns = 60.14m (Maximum building height = 32.28m) and a basement level Class E-g(ii) research & development of products or processes on floors 02 to 06, with Class E-g(i) office use on ground, first and 7th floors; two high quality retail units on Tottenham Court Road. There will be flexible wet-lab-enabled floorplates on levels 2 to level 6.



6.110. The Massing of the proposed Lab Scheme in RM02 fits within the maximum envelope of the Outline Application. With the exception of exhaust flues positioned outside of the viewing corridor, all plant equipment at high level sits below the plant enclosure. The key difference between RM01 and RM02 is that the floor to floor heights (4m) are greater than the floor to floor height for an office (3.43m). This is due to internal requirements of the life science scheme. The overall heights of the schemes remain the same.

### **Public Realm**

6.111. London Policy 7.6 states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

6.112. Policy T1 of the Local Plan states that the council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. In order to promote walking in the borough and improve the pedestrian environment, they will seek to ensure that developments improve the pedestrian environment by supporting high quality public realm improvement works.

6.113. Policy A2 states that the Council will protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure.

6.114. The FAAP outlines that the priority for the Network building is to retain business uses and to provide public open space, whilst retaining the Cypress Place mews which runs through the centre of the site. The FAAP designation also requires the on-site provision of public open space.

6.115. Detailed discussions have been undertaken with Officers at LBC regarding the proposed loss of Cypress Place. Cypress Place is a narrow two-way road that

runs through the site between Maple Street to the north and Howland Street to the south. The road acts primarily as a servicing and access route for vehicles servicing the site and the adjacent 90 Whitfield Street building. Cypress Place also provides access to the existing basement car park within the site. The proposal includes the termination of the southern end of Cypress Place to allow for the development thus altering Cypress Place from a two-way through route to a cul-de-sac.

- 6.116. The retention of Cypress Place would compromise the proposed office accommodation, resulting in a compromised split office core, and split back of house servicing. The closure of Cypress Place would allow for a higher quality office building and offers the opportunity to give a positive identity to Howland street and significantly improves the corner conditions at Tottenham Court Road and Whitfield St.
- 6.117. During pre-application discussions, Officers outlined that they would be supportive of the closure of Cypress Place as a public right of way and the loss of the area of public realm can be supported in principle where a suitable contribution to improving public open space is provided as part of any scheme.
- 6.118. Stopping-up of Cypress Place has been proposed as a key strategy to improve the Network Building efficiency, while bringing key benefits to the public realm, like reconnecting the footway on Howland Street. In terms of ownership, the stopping-up will extend to the North end of Cypress Place, at the junction with Maple Street.
- 6.119. Along with the improved facade design and reconfigured building arrangement the proposed significant widening of the pavements on Howland Street and Whitfield Street, along with the proposed stopping up of Cypress Place, unlocks a number of opportunities to dramatically enhance the quality of the

public realm around the building. These improvements are summarised as follows:

- Stopping-up of Cypress Place will allow reconnection of footway on Howland Street;
- Main office entrance and reception activates Howland Street, improving its sense of identity;
- Increased pavement width on Howland Street and Whitfield Street providing more generous pedestrian circulation;
- Significant opportunities for tree-planting and ecologically beneficial landscaping providing increased greening at street level and buffering the pavement from a busy road;
- A curved corner helps pedestrian flow at pinch point of busy pavement;
- High quality Retail Frontage along Tottenham Court Road with external zone allocated to enable external dining;
- Dedicated goods delivery and refuse all via Cypress Place, reducing service traffic on Howland Street;
- New entrance to add activity and interest to Whitfield Street;
- Civic benches incorporated in facade design to improve public realm experience in key corner of the building;
- Removal of stairs and basement car parking vents on Howland Street and Whitfield Street which currently provide obstruction to the pavement;
- Widening of pavement allows inclusion of ecologically beneficial rain gardens improving biodiversity and reducing surface water run off (target: c.105 sqm); and
- Widening of pavement allows reinstatement of 'green corridor of Plane trees connecting those to the west on Howland Street with those of Tottenham Court Road.

6.120. In general, the proposals will transform the public realm around the site to one cohesive high quality, connected space which will integrate the new buildings

with their surroundings, aid orientation and legibility and provide more direct and pleasant routes for people who walk through the area on a daily basis.

### Heritage

- 6.121. National planning guidance on the historic environment is provided by the NPPF. It defines what constitutes the historic environment, including ‘heritage assets’ (which can be designated or undesignated), and sets out the policy approach to assessing development proposals which affect heritage assets either directly or in terms of their setting.
- 6.122. Designated heritage assets include World Heritage Sites, listed buildings and conservation areas among other designations.
- 6.123. Chapter 7 focuses on policies relating to the built environment, both the historic built environment and new development. These policies have been taken into careful consideration in the formation and assessment of these proposals. Of particular relevance are Policy 7.1 Lifetime neighbourhoods, Policy 7.2 which promotes the highest standards of accessible and inclusive design and Policies 7.4 and 7.5, which protect local character and public realm. Policy 7.6 which makes provision for the highest architectural quality (7.6Ba) and requires that architecture should make a positive contribution to the city (7.6A).
- 6.124. Policies 7.8 to 7.10 consider the Historic Environment, 7.8C states that ‘development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail’ (p.287). Paragraph 7.31 expands on the Policy 7.8, stating that:

*“Heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form. development*

*that affects the setting of heritage assets should be of the highest quality of architecture and design and respond positively to local context and character.”*

6.125. Intend to Publish London Plan HC1 States that heritage conservation and growth will replace Policy 7.8 of the adopted London Plan (Ref 1-7) and states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.

6.126. Camden Local Plan Policy D2 (Heritage) outlines that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. The policy goes on to state that the Council “will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings...” The policy also goes on to state that “*in order to maintain the character of Camden’s conservation areas, the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area... resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.”*

#### *Relevant Heritage Assets*

6.127. The site at 95-100 Tottenham Court Road is not located within a conservation area; however, there are a number of conservation areas in the immediate vicinity. These include Bloomsbury Conservation Area in the LBC the western boundary of which adjoins Tottenham Court Road; Charlotte Street Conservation Area (Camden) to the south; and, Fitzroy Square Conservation Area (Camden) to the northwest. At the west end of Howland Street is the eastern boundary of the East Marylebone Conservation Area, located in the

London Borough of Westminster. This conservation area is located some distance away, and due to the nature of the local townscape, views of the site are limited to the south end of Howland Street. As such the building has little to no impact on the setting of the conservation area.

6.128. The Network Building, located on a prominent corner site, also forms part of the wider setting of Heal and Son Limited (Grade II\*) and Glen House (Grade II) both of which are situated to the south on the east side of Tottenham Court Road. The building also forms part of the wider setting of the Grade II listed BT Communication Tower. Where the building is seen as part of the wider setting of these listed buildings it makes a neutral contribution to this setting. No.2 Maple Street (Grade II) is in closer proximity to the site but the buildings on the site are not seen in the context of its immediate Maple Street setting as they are separated from it by the substantial Qube development. As 88 Whitfield Street has only a single street facing elevation fronting onto the fairly narrow Whitfield Street, it is entirely concealed in views from the neighbouring streets and as a result has no impact on, and makes no contribution to, the wider setting of the nearby listed buildings

#### ***Effects on heritage assets***

6.129. A Historic Building and Townscape report has been prepared by Donald Insall and Associates. An assessment of the significance of The Network Building and 88 Whitfield Street and their individual contribution to the setting of the nearby Bloomsbury, Charlotte Street and Fitzroy Square Conservation Areas and nearby listed buildings has been undertaken. The report states that the present building is *“not considered to be of any special architectural or historic interest; and neither is it considered to be a non-designated heritage asset.”* In addition, the building at 88 Whitfield *“is not considered to be of any special architectural or historic interest; and neither is it considered to be a non-designated heritage asset. The building makes a neutral contribution to the streetscape of Whitfield Street, largely due to its narrow frontage being*

*unobtrusive and only visible in views north and south along Whitfield Street, and is otherwise concealed from local views within the area.”*

6.130. As set out in the Historic Building Report and Townscape and Visual Impact Assessment it is considered that overall the Network Building makes a neutral contribution to the setting of these nearby conservation areas, but certain elements detract where it is seen in partial views from the south. No.88 Whitfield Street makes no contribution to the setting of the Bloomsbury and Charlotte Street Conservation Areas and a neutral contribution where it is visible in the view south along Whitfield Street from the southern boundary of the Fitzroy Square Conservation Area.

#### **Townscape and Views**

6.131. In terms of townscape significance, The Network Building (95-100 Tottenham Court Road and 76-80 Whitfield Street) and 88 Whitfield Street stand on a site surrounded by a varied mixture of townscape elements; much of the immediate area was completely destroyed by bombs during the Second World War and as a result many of the sites nearby have been redeveloped or are currently under redevelopment. On Tottenham Court Road some of the 19th century commercial development remains, and the street has a number of examples of notable buildings dating from the mid-19th century to the post-war period, the most significant being Heals and Son Ltd (Grade II\*). The significance of the site today therefore lies in its prominent corner location, on a major commercial street in London. The site provides an opportunity to provide a new building of the highest architectural quality which would enhance the townscape and the setting of the nearby designated heritage assets.

6.132. An assessment of the impact of the proposals on local and strategic views is provided in the accompanying ‘Historic Building Report and Townscape and Visual Impact Assessment’ prepared by the Donald Insall.

- 6.133. The London View Management Framework (LVMF) designates, protects and manages twenty-seven views of London and some of its major landmarks. Policy 7.11, London View Management Framework, of the London Plan, identifies that the Mayor has designated a list of strategic views that he will keep under review. These views are seen from publicly accessible and well used places. They include significant buildings or urban landscapes that help to define London at a strategic level. Within the views, the Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's authenticity, integrity, significance and Outstanding Universal Value.
- 6.134. Policy D1 outlines that the Council will seek to secure high quality design in development and will require that development "*preserves strategic and local views.*"
- 6.135. The building on site is not considered a tall building. As set out in CLP tall buildings are defined as building which are "*substantially taller than their neighbours or which significantly change the skyline.*"
- 6.136. The majority of the site is located within the protected view from Assessment Point 2B.1 (Parliament Hill) towards the Palace of Westminster in the London View Management Framework. It is not however located in any locally identified and protected Townscape Views or Conservation Area Views.
- 6.137. The selection of the views for assessment has been determined in part by planning policy, with the inclusion of designated views from the London View Management Framework View 2.B1 Parliament Hill: east of the summit, and local viewpoints that have been selected for the purposes of assessing the proposed development and its potential impact upon the site and surrounding area.



- 6.138. The views selected for the Visual Assessment have been agreed in consultation with LBC. 10 views have been assessed, including one strategic view 2B.1 London Panorama Parliament Hill LVMF 2B.1.
- 6.139. In summary and as set out in the view's assessment, the impact on the designated LVMF View 2B.1 would be neutral, with little discernible change to the view. Views V01, V02, V06 and V09 are from the boundary of the Bloomsbury Conservation Area and the effects would be major beneficial to neutral based on what is visible and can be assessed in the view. View V04 is from the northern boundary of the Charlotte Street Conservation Area and the effects on the townscape and view would be major beneficial. View V05 is from the northern boundary of the Fitzroy Square Conservation Area where the effects on the townscape and view would also be major beneficial. V03, V07 and V08 are outside any designated conservation areas and the effects would once again be major beneficial.
- 6.140. Where the proposals are visible in views around the site and from within the nearby conservation area or where it is viewed within the setting of Heal and Son Limited (Grade II\*) and Glen House (Grade II) and the BT Tower (Grade II) the effect would be positive and the development would preserve and enhance that setting. As concluded in the Historic and Townscape Report, the *“overall effect of the proposed development on the setting of heritage assets would therefore be major, beneficial as ‘The proposed development would substantially enhance the character of the townscape and identified view or setting of any designated heritage assets, either through the removal of visually detracting or harmful elements, or through the introduction of positive elements that build on the character of the townscape and setting of any designated heritage assets.’”*

**RM01 & RM02**

6.141. As the Historic Building and Townscape Report assesses the maximum parameters, Donald Insall have confirmed within compliance statements that the details provided for the Reserved Matters Applications will not materially alter the conclusions within the Heritage Statement and Townscape Visual Impact Assessment submitted with the outline planning application.

### **Transport**

#### *Accessibility and public transport impact*

6.142. Paragraph 103 of the NPPF states that the planning system should actively manage patterns of growth, focussing significant development on locations which are or can be made sustainable, to limit the need to travel and offer a genuine choice of transport modes. Paragraph 111 requires developments that will generate significant amounts of movement to provide a Travel Plan and a Transport Assessment, so that the likely impacts can be assessed. Paragraph 110 states that applications for development should give priority to pedestrians and cycle movements, both within the scheme and with neighbouring areas, and second – so far as possible – facilitate access to high quality public transport, with layouts and appropriate facilities that encourage public transport use.

6.143. Policy 6.3 of the London Plan (2016) states that *“development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. development should not adversely affect safety on the transport network.”*

6.144. Camden Local Plan 2017 Policy T1 – Prioritising walking, cycling and public transport states: *“The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough”.*

6.145. Policy T2 – Parking and car-free development states “The Council will limit the availability of parking and require all new developments in the borough to be car-free.” The Council aims to:

- a) Not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on street parking permits;*
- b) Limit on-site parking to i. spaces designated for disabled people where necessary, and/or ii. essential operational or servicing needs;*
- c) Support the redevelopment of existing car parks for alternative uses; and*
- d) Resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.*

#### ***Outline Planning and Reserved Matters Applications***

6.146. In line with London Plan policy 6.3 a Transport Assessment has been provided to support the Outline planning application and two compliance statements to support the Reserved Matters. The transport assessment has assessed the ‘worst case’ scenario of a development on site based on the maximum floorspace. This assessment is therefore relevant for both the Outline and Reserved Matters application. Where there is some minor differences these have been outlined within the supporting compliance statements submitted with the application.

6.147. Planning policy at all levels advocates locating new developments in areas which are easily accessible by sustainable travel. The proposed development location achieves a PTAL rating of 6b, which is categorised as ‘excellent’. The site is located within proximity of several London Underground stations, rail stations, and local bus services.

6.148. The proposed development will also be car-free and substantially remove existing car parking, while including additional parking provision for disabled motorists on site. In addition, cycle parking will be provided in line with the

Intend to Publish London Plan standards and will also reflect the policy aspirations of the Camden Planning Guidance. A mix of cycle parking will be available (including 5% provision for larger/adapted cycles), along with the provision of folding bicycle lockers, and provision of showers, lockers and changing facilities.

6.149. The proposal makes direct provision for deliveries and servicing and will provide sufficient waste storage (including recycling) to ensure that the development can be adequately and safely serviced.

6.150. As set out within this statement, the proposals have identified significant potential improvements to the public realm, which would prioritise pedestrian and cyclist movement. This is in line with national policy, as well as the Healthy Streets Approach and aspirations of the Camden Planning Guidance, which aims to have all new developments make the movement of people in and around the site a key priority.

#### *Car Parking*

6.151. The proposal includes the removal of the existing basement level parking (17 spaces), accessed from Cypress Place, along with 14 parking spaces within Cypress Place. Two disabled accessible parking bays, two standard parking bays, and two loading bays within Cypress Place that serve the adjacent office development (90 Whitfield Street) will be retained.

6.152. The quantum of disabled parking required for commercial land uses is dictated within the Draft London Plan (Intend to Publish version 2019) at Paragraph A, Policy T6.5 – Non-residential disabled persons parking – which states: *“all non-residential elements should provide access to at least one on or off-street disabled persons parking bay”*. On this basis, a single additional disabled parking space is proposed at-grade within Cypress Place.

- 6.153. In light of the above, the proposal will result in the removal of a total of 17 parking bays within the existing basement car park. In addition, as a result of the proposed stopping-up and reconfiguration of Cypress Place, a total of 14 standard parking bays will be removed, therefore the proposal includes for the removal of a total of 31 car parking bays. A total of two standard parking bays will be retained within Cypress Place; these are currently allocated to existing tenants of the 90 Whitfield Street development, however, are seldom used.
- 6.154. This proposed approach to parking provision is considered to be in accordance with transport policy, which seeks to discourage travel to/from the site by the private car. It will also further reduce the level of traffic generated by the site and should be viewed as a net benefit of the proposal.

#### *Cycle Parking*

- 6.155. Cycle parking will be provided in accordance with the above minimum requirements and will be located at basement level. Access will be via a dedicated cycle access with appropriately sized cycle lift and stairs with cycle channel. The proposal will also include provision of showers at a minimum ratio of 1:10 cycle parking spaces, lockers at a minimum ratio of 1 per cycle parking space and changing facilities.

#### *Delivering and Servicing*

- 6.156. Servicing activity will be undertaken from Cypress Place with two loading bays provided within a 'servicing zone' located immediately adjacent to the northern façade of the building. A 'Goods In' entrance and will be provided adjacent to the servicing zone for ease of access to / from the building.
- 6.157. Waste will be stored at ground floor level and managed by the Site Management Team. All waste at the site will be collected by a private waste collection company, with waste collection vehicles able to stop within the

servicing zone, immediately adjacent to the waste store. The frequency of collection will be flexible to meet with the development requirements.

6.158. Servicing and waste collection vehicles will access the site via Cypress Place from Maple Street, as per the existing situation. Given the proposals include the termination of the southern section of Cypress Place, vehicles would then turn and exit Cypress Place onto Maple Street.

6.159. The proposed development will generate an additional 15 servicing vehicles per day (30 two-way vehicle movements), when compared to the existing use of the site. If it is assumed that each servicing vehicle will undertake loading activity for up to 15 minutes on average. The loading bays will be managed on a time-booking system and each vehicle will be allocated a 30-minute timeslot, therefore based on servicing between 07:00 and 19:00, the servicing zone can accommodate 48 vehicles per day. Allowing exclusive use of the servicing zone for one hour per day for waste collection, the capacity of the servicing zone would be 44 vehicles per day, which is sufficient capacity for the development proposed.

#### *Waste*

6.160. Waste storage will be provided in accordance with British Standard (BS) 5906:2005, which requires the following weekly waste storage:

- Office - 50 litres of storage per employee;
- Retail (A1) - 10 litres per sales floor area; and
- Retail (A3) - 75 litres per cover.

6.161. The guidance in BS5906 does not specify the proportion of required recycling storage, however it is proposed that a minimum of 65% of total waste storage will be provided for recyclable materials.

6.162. Waste storage will be provided at ground floor, with direct access provided to the loading bays located externally to provide ease of access for waste collection personnel.

### **Energy and Sustainability**

6.163. Paragraph 148 of the NPPF notes that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

6.164. At paragraph 154 the NPPF states that in determining planning applications, local planning authorities should expect new development to:

1. comply with any development Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
2. take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

6.165. Policy 5.2 of the London Plan (2016) advises that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

6.166. The policy also states that the Mayor will work with boroughs and developers to ensure that major developments meet the stated targets for carbon dioxide

emissions reduction in buildings. Policy 5.3 requires the highest standards of sustainable design and construction to be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

- 6.167. London Plan Intend to Publish Policy SI3 outlines that Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure rising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development. Energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options. Energy masterplans should identify:
- 1) major heat loads (including anchor heat loads, with particular reference to Sites such as universities, hospitals and social housing)
  - 2) heat loads from existing buildings that can be connected to future phases of a heat network
  - 3) major heat supply plant
  - 4) possible opportunities to utilise energy from waste
  - 5) secondary heat sources
  - 6) opportunities for low temperature heat networks
  - 7) possible land for energy centres and/or energy storage
  - 8) possible heating and cooling network routes
  - 9) opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
  - 10) infrastructure and land requirements for electricity and gas supplies
  - 11) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector



6.168. In line with the new guidance from GLA, the energy statement for the development will assess carbon savings using the new carbon emission factors (SAP10). Cooling mitigation strategies will be evaluated to avoid overheating risk within building spaces.

### ***Outline Planning Application***

6.169. The outline application sustainability statement demonstrates the proactive approach from the design team to ensure the scheme aligns with the global, national and local sustainability objectives and planning policy requirements. The sustainability sets out that the Applicants environmental and social sustainability aspirations and that the development has embedded best practice design and construction principles within the proposals which can be summarised as follows:

- Carbon efficient development that considers whole life cycle carbon emissions with the aspiration to minimise energy demands and exceed minimum policy requirements
- Application of the energy hierarchy, best practice industry standards for fabric performance alongside the incorporation of zero carbon technologies
- Designed for climate resilience and UHI mitigation, embedding mitigation measures to ensure a future proofed development.
- Significantly enhances the proposals green infrastructure through intensive and extensive green roof design and soft landscaping.
- Application of principles of circularity to optimise material efficiency, future flexibility and adaptation and minimising waste on site.
- Use of low toxicity, healthy, and sustainably sourced material to ensure user wellbeing and contribute to improving internal air quality.
- Use of low flow sanitaryware fittings and a design strategy to minimise external water use.

- Healthy and comfortable internal environments for occupant wellbeing and satisfaction, placing the user front and centre to enhance experiences of the development.
- Inclusive design that is accessible to all and a design that promotes and contributes to a healthy city.

6.170. The sustainability statement sets out that the application has incorporated sustainable design and construction principles from the outset, ensuring alignment with the Greater London Authority and Local Planning requirements and demonstrating best practice across the breadth of sustainability. Where there are specific sustainable commitments made as part of the design development for either the office or life science scheme these have been detailed in the respective reserved matters applications.

#### ***RM01 (Office)***

6.171. The heating, cooling and electrical demands of the proposed development will be met, whilst at the same time energy consumption and associated CO2 emissions to the atmosphere will be reduced, in accordance with the national, regional and local planning policy requirements and considering the site-specific necessities. From the early design stage analysis, the following energy strategy has been identified for the proposed development:

- Specification of energy efficient and passive design measures, with associated savings in CO2 emissions of 38 tonnes over the baseline building (regulated energy); and
- Renewable heat recovery chiller and heat pump systems providing space heating, cooling and DHW supplemented by a PV array achieve a further reduction in CO2 emissions of circa 76 tonnes.

6.172. In total, this energy strategy will allow the proposed development to achieve up to 43% reduction in regulated CO2 emissions over the baseline, with energy

efficiency measures providing 15% reduction and the proposed LZC technologies contributing additional 29% to the overall CO2 emissions reduction.

6.173. As such, the proposed development will meet all Draft London Plan aspirational targets for energy efficiency and minimum carbon reduction. The potential CO2 emissions savings achievable have been maximised through introduction of passive design and energy efficiency measures. In addition, the application site's potential for installation of renewable technologies has been fully utilised by the design team and the improvements achieved by this energy strategy over the baseline are supportive of the objectives of the local and regional policy.

6.174. For further information please refer to the Energy and Sustainability statements prepared by TFT.

### ***RM02 (Life Science)***

6.175. An energy statement has been prepared by Arup for the life science scheme and it presents the results of modelled carbon emission improvements against a defined baseline and outlines strategies to mitigate these emissions. The assessment is structured according to the Mayor's energy hierarchy

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

#### *Stage 1: Use Less Energy*

6.176. A selection of passive demand reduction measures (including heat recovery systems and optimising u-values) are employed to reduce demand.

#### *Stage 2: Supply Energy Efficiently*

6.177. The proposed laboratory-enabled network building is not near-by to any existing or planned heat networks in the area; therefore, it has not been possible to propose to connect to a DHN at this stage. The building will, however, be designed such that it can connect to a DHN in the future should one become known. CHPs do not align with Camden's air quality policies therefore is not appropriate to install at this site.

*Stage 3: Use Renewable Energy*

6.178. This stage of the energy hierarchy identified air source heat pumps (ASHPs) and solar photovoltaic (PV) panels as appropriate renewable technologies to be installed at the site.

6.179. Following the Mayor's energy hierarchy assessment methodology, the proposed energy strategy allows the development to achieve an overall 34% reduction in regulated CO2 emissions under SAP.

**Environmental effects**

6.180. The proposed development has been assessed in terms of its potential for impacts on a number of environmental issues, which include, inter alia;

- 1) Daylight, sunlight and overshadowing;
- 2) Flood Risk;
- 3) Noise; and
- 4) Air quality

6.181. The accompanying environmental reports provide a full assessment of the proposals in relation to each of these matters. A brief summary of each is provided below.

**Daylight and Sunlight**

- 6.182. The basis for the technical analysis and methodology employed for sunlight and daylight and overshadowing is derived from The Building Research Establishment Guidelines entitled Site Layout Planning for Daylight and Sunlight 2011 by P J Littlefair (The BRE Guidelines).
- 6.183. The NPPF, at paragraph 123 (part c) 'achieving appropriate densities', states that 'local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a Site (as long as the resulting scheme would provide acceptable living standards)'.
- 6.184. The report considers the daylight and sunlight effects to the existing surrounding residential properties in regard to the proposed outline application (maximum development) for the redevelopment of The Network Building, 85 -100 Tottenham Court Road and 76-80 Whitfield Street.
- 6.185. The detailed results of our daylight and sunlight assessments demonstrate that the effects caused by the development will be almost completely compliant with the BRE numerical targets, with the exception of a small number of windows within The Carpenter's Arms Public House at 68-70 Whitfield Street. The majority of this building is in use as a public house and therefore in accordance with the BRE Guidelines does not require a detailed daylight and sunlight assessment, however given the uncertainty surrounding the use of the second-floor accommodation, this building has been included within the technical assessments for absolute completeness.
- 6.186. The analysis demonstrates that the ground and first floor levels of the public house will generally maintain good levels of daylight and sunlight for an urban

environment and the majority of windows and rooms will meet the BRE Guideline criteria. There will be some transgressions of the daylight assessments at second-floor level, although this is in part due to the inherent limiting effect of the buildings own projecting roof eaves rather than the development. In the context of a built-up urban environment, such as the application site, a degree of flexibility in respect of the BRE daylight and sunlight guidance is recommended, however the vast majority of windows and rooms within the surrounding residential properties will comfortably meet the BRE Guidelines. Point 2 conclude that the proposed development will have limited effect upon the amenity enjoyed by neighbouring properties.

### **Flood Risk/ Surface Water Drainage**

#### ***Outline and RM01 & RM02***

- 6.187. The existing site is located within Flood Zone 1 and is considered to be at low risk of flooding from fluvial and tidal sources. The development site area is less than 1 hectare in plan area, and not located in an area identified by the London Borough of Camden as a Local Flood Risk Zone. As a result, in accordance with Paragraph 103 footnote 20 of the NPPF, a site-specific flood risk assessment is not required for planning.
- 6.188. Following the advice and guidance provided by the London Borough of Camden; a SuDS strategy has been produced for the planning application associated with The Network Building.
- 6.189. The SuDS Hierarchy has been followed in order to employ the most suitable and practicable SuDS techniques to improve surface water run off rates from the site. The proposed development will restrict surface water run off to the public sewer to a peak discharge of 37.4l/s for the site. This provides a betterment on existing of over 54% for the 1 in 100-year event + 40% climate change event.

- 6.190. A blue roof system over the main roof area and terraces at Level 05 will provide surface water attenuation above ground level and help restrict these areas of the site to a peak discharge rate of 1.4l/s for the 100 year + 40% climate change return period. A partial green roof at level 08 and 09 will help with the reduction in peak runoff from the site and also improve the biodiversity of the site and help reduce the urban heat island effect. Due to the available build-up depth for the other roof terraces, it is not possible to drain all areas through the blue roof system. It is therefore proposed to allow the remaining areas to drain freely to the sewer. The site achieves an improvement of over 55% in the 1 in 100-year event + 40% climate change event, which is in line with the minimum 50% reduction stated by LBC in the guidance documents.
- 6.191. Through the use of SuDS techniques and following the guidance and policy provided by the London Borough of Camden, the surface water management of the proposed site will see a significant betterment from the existing case.

### **Noise Impacts**

- 6.192. Policy 7.15 within the London Plan (2016) concerns the reduction and management of noise. At a strategic level the transport, spatial and design policies of the London Plan will be implemented in order to reduce and manage noise to improve health and quality of life and support the objectives of the Mayor's Ambient Noise Strategy.
- 6.193. Amongst other objectives, the policy states that development proposals should seek to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development, mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development. Proposals should also separate new noise sensitive development from major noise sources.

- 6.194. A detailed 24-hour survey has been carried out and the existing LA<sub>max</sub>; LA<sub>eq</sub> and LA<sub>90</sub> environmental road, rail and air traffic noise levels at 4 “secure” on-site position have been established, by means of fully computerised unmanned monitoring equipment. Plant noise emission criteria have been recommended based on the results of the noise survey and with reference to the Local Authority’s requirements.
- 6.195. The assessment indicates that the proposed plant, subject to compliance with the indicated limiting noise levels and mitigation measures, should be capable of achieving the proposed environmental noise criteria at the nearest noise sensitive residential window.

### **Air Quality**

#### ***Outline and Reserved Matters***

- 6.196. Policy 7.14, Improving air quality of the London Plan (2016) states that The Mayor recognises the importance of tackling air pollution and improving air quality to London’s development and the health and wellbeing of its people. He will work with strategic partners to ensure that the spatial, climate change, transport and design policies of this plan support implementation of his Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimize public exposure to pollution.
- 6.197. The air quality impacts associated with the proposed development have been assessed. The air quality assessment has been based on the ‘maximum parameters’ and therefore assesses the worse case scenario and is relevant to all three applications.
- 6.198. The assessment has considered the impacts of the proposed development on local air quality in terms of dust and particulate matter emissions during construction, emissions from road traffic generated by the completed and occupied development, and emissions from the emergency generators and



diesel fire sprinkler pump. It has also identified whether or not the proposed development is air quality neutral (as required by the London Plan).

- 6.199. The assessment has demonstrated that the incremental changes to traffic flows on the local road network will be below recognised screening thresholds, and that the effects of road traffic on existing sensitive receptors will be insignificant.
- 6.200. The assessment has also demonstrated that the operation of the generators will lead to insignificant changes to annual mean concentrations, both in terms of nitrogen dioxide and particulate matter. In terms of the short-term objectives, the testing of the generators will not result in an exceedance of either the 1-hour mean nitrogen dioxide, or the 24-hour mean PM10 objectives.
- 6.201. The overall operational air quality effects of the proposed development are judged to be 'not significant'. This conclusion is based on the proposals having an insignificant effect on local air quality.
- 6.202. The building and transport related emissions associated with the proposed development are both below the relevant benchmarks. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral.

## 7. PLANNING BENEFITS

7.1 The proposal has been carefully and sensitively developed over an iterative design process. For clarity, key aspects of this approach are summarised below and should be given full and significant weight.

7.2 The result of this iterative and considered approach is the delivery of an exemplar and well-designed scheme that will deliver the following substantial public benefits that form material considerations of the planning application that should be afforded full weight in the determination of the application.

7.3 It is considered that overall, the proposed development accords in all material respects with the relevant policies and delivers significant benefits through:

- Significant increase in employment floorspace (8711 sqm GIA)
- Providing a building designed by an award-winning architectural practice which will be of a high-quality and based on a clear understanding of the site and its relationship with its context;
- Providing a significant uplift of economic activity, with the office space expecting to accommodate circa 1024 jobs (an uplift of approximately 595 jobs over what currently exists on site) contributing to Camden's overarching objectives within the Local Plan.
- The provision of additional office and life science accommodation will help to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031.
- Provision of affordable workspace providing a 100% uplift over what currently exists on site (0%).
- Contributing to the growing need from the Life Sciences industry for commercial properties that are capable of accommodating laboratory activity and responding to demand by providing commercial workspace for the growing knowledge economy within London's prime knowledge cluster, with a particular focus on the Life Sciences sector.

- Widening of pavements which allows for inclusion of ecologically beneficial rain gardens improving biodiversity and reducing surface water run off (target: c.105 sqm);
- Providing a sustainable development which seeks to achieve BREEAM 'Excellent' with renewable energy technologies maximised;
- Providing a carbon efficient development that considers whole life cycle carbon emissions with the aspiration to minimise energy demands and exceed minimum policy requirements.
- Incorporating a blue roof system over the main roof area and terraces at Level 05 will provide surface water attenuation above ground.
- Removal of commercial car parking at Network;
- Providing an increase of activation along the street of c.26 metres;
- New cycle and welfare facilities for office and life science users;
- Rooftop amenity space for tenants;
- Sustainable, wellness, connectivity; and
- Creating inclusive and accessible buildings.

## 8. PLANNING OBLIGATIONS

Draft Heads of Terms for Section 106 Agreement

8.1 It is envisaged that the following planning obligations will be necessary to make the development acceptable in planning terms, subject to discussion with the Local Planning Authority:

- Public realm and highway works;
- Employment and Skills Plan
- Landscape and public realm strategy
- Affordable workspace
- Delivery and servicing management plan
- Affordable Housing
- Travel plan
- Carbon Reduction
- Section 278 agreement
- Monitoring

## 9. CONCLUSIONS

- 9.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development Plan unless other material considerations indicate otherwise.
- 9.2. This planning statement has been prepared by DP9 Ltd on behalf of Derwent Valley Property Developments Ltd & LMS Offices in support of an Outline Planning Application with layout and appearance reserved, and two Reserved Matters Applications for the development of the Network Building, 95-100 Tottenham Court Road and 76-80 Whitfield Street. The decision to make an outline application is based on the Applicant's aspiration to incorporate life sciences within the building. There are two Reserved Matters Applications that are being submitted in parallel for the same site, one for an office scheme and one for a life science scheme. This is possible due to the fact that both the office and life science fall within the same 'use class'. The permissions would establish the key principles whilst ensuring as much flexibility as possible in order to create a building which meets the requirements of both office and lab tenants.
- 9.3. The proposed development accords with the NPPF and represents sustainable development which accords with the development Plan. The design process for the scheme has taken into account the full range of stakeholder views.
- 9.4. This Planning Statement assesses the development against the development Plan and other relevant national, regional and local planning policy, including the aspirations established in the draft Local Plan and the draft London Plan. It is considered that the principle of the development accords with current and emerging planning policy and guidance.
- 9.5. The proposed development would provide a significant uplift of economic activity, with the office space expecting to accommodate circa 1024 jobs (an

uplift of approximately 595 jobs over what currently exists on site) contributing to Camden's overarching objectives within the Local Plan.

- 9.6. Innovation is considered fundamental to the growth of London, encouraging collaboration across different sectors, promoting links between business and providing support for innovative activities and fostering entrepreneurial skills.
- 9.7. The building's design for RM02 has been tailored to accommodate the widest possible cross-section of biotech, pharma, med-tech and digital health companies, ranging from those seeking a 100% office style layout to organisations running full laboratory operations at various stages of growth.
- 9.8. The impacts of the development have been fully assessed by the supporting application documents and mitigation measures have been identified where necessary. The development is considered to be entirely appropriate for the site, and the area.
- 9.9. The development proposals are considered to accord with the development Plan, and therefore benefit from the presumption in s38(6) of the 2004 Act. Furthermore, it accords with the policies of the NPPF as a whole and is deemed to be 'sustainable development' in terms of Paragraph 14, and therefore the development should be granted full planning permission.