

Address:	Network Building (95-100 Tottenham Court Road) 76-80 Whitfield Street) and 88 Whitfield Street London W1T 4TP		3
Application Numbers:	2020/5624/p	Officer: Gavin Sexton	
Ward:	Bloomsbury		
Date Received:	02/12/2020		

Proposal: Outline application for demolition of office building (95-100 TCR & 76-80 Whitfield St) and 7 flats (88 Whitfield Street) and construction of a new building to provide for a maximum of 17746 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. Details of layout and appearance are reserved.

CONSULTATION NOTE: Application is linked to redevelopment of 14-19 Tottenham Mews (ref 2020/5633/P) and Reserved Matters details for office building (ref 2020/5631/P) and Reserved Matters details for lab-enabled building (ref 2020/5638/P).

Supporting Documents and Drawing Numbers:

Proposed Outline Parameter Plans :

Prefix: 13538-A-: L-1-07-099 Basement Plan Rev01, L00-07-100 Ground Floor Plan Rev01, L01-07-101 First Floor Plan Rev01, L02_L06-07-102_106 Second - Sixth Floor Plan (Typical) Rev01, L08-07-108 Eighth Floor Plan Rev01, L09-07-109 Roof Plan Rev01;

Proposed Outline Parameter Elevations and Sections :

Prefix 13538-A-: E01-07-140 East Elevation Rev01, E02-07-141 South Elevation Rev01, E03-07-142 West Elevation Rev01;

Control Documents:

Revised Development Specification 28 May 2021 V2;
Design guidelines (as contained in Design & Access Statement Outline Application Rev 01) ;

Supporting drawings:

Existing drawings :

13538-A-LXX-03-001 Site Location & Proposed Site Plans; Prefix 13538-A-: LG-01-099 Basement Floor Plan, L00-01-100 Rev 1 Ground Floor Plan, L01-01-101 First Floor Plan, L02_L03-01-102_103 Second & Third Floor Plan, L04-01-104 Fourth Floor Plan, L05-01-105 Fifth Floor Plan, L06-01-106 Sixth Floor Plan, L07-01-107 Seventh Floor Plan, RF-01-108 Roof Plan, S01-01-110 North / South Section 01, S02-01-111 North / South Section 02, S03-01-112 East / West Section 01, E00-

01-120 East Elevation, E01-01-121 South Elevation, E02-01-122 West Elevation, E03-01-123 East Elevation (Cypress Place), E04-01-124 North Elevation (Cypress Place);

Demolition drawings:

13538-A-L08-02-100 Demolition Plan; 13538-A-E01-02-110 Demolition Elevation - Howland Street;

Supporting documents:

Design & Access Statement Outline Application Rev 01 (incorporating Design Guidelines); Archaeological desk-based assessment Issue 2 11/11/20 by MOLA; Energy Statement The Network Building Issue 01 (30 October 2020) by Tft; Air Quality Assessment: J4320A/1/F3 19 November 2020 air Quality Consultants; Preliminary Ecological Appraisal Issue 2.0 10/11/20 by The Ecology Consultancy; Arboricultural Impact Assessment April 2021 ref 200914-PD-11 by Tim Moya Associates; Tree Schedule 200914-PD-10 (BS5837) by Tim Moya Associates; Impact Assessment by WYG Final Nov 2020; Heritage Statement and Townscape and Visual Impact Assessment by Donald Insall Associates Nov 2020; Construction Management Plan (and Proforma) Version 1 19/10/20 by Caneparo Associates; Workplace Travel Plan by Caneparo Associated Nov 2020; Statement of Community Involvement by Concilio; Planning Statement by DP9 Nov 2020. Tree survey 200914-P-10 Sept 2020; Daylight and sunlight report by Point 2 Surveyors Nov 2020 v: Planning V1 ref : P1618; Plant Noise Assessment 27891/PNA1/OA.Rev1 19/11/20 by Hann Tucker; Revised Office GLA_WLC_assessment_template_TNB_April21_V2.xlsx; Revised Life Science GLA_WLC_assessment_template_TNB_April21_V2.xls; Circularity Strategy Table 1 of Appendix 2 of completed GLA Circular Economy Guidance table; Fire Strategy Rev: 2 Issued: 11/12/20 by Norman Disney & Young; Access Statement by Proudlock Associates, Nov 2020; Surface Water Drainage Statement rev P2 10.05.21 by Elliottwood; Transport Statement Nov 2020 by Caneparo Associates; Sustainability Statement [200151/DVPL] by Tft 2020 ; Financial Viability Assessment with Appendices 1-7 by DS2 18 May 2021; Health Impact Assessment by WYG Final Nov 2020; Heritage Statement and Townscape and Visual Impact Assessment by Donald Insall Associates Nov 2020; Construction Management Plan (and Proforma) Version 1 19/10/20 by Caneparo Associates; Workplace Travel Plan by Caneparo Associated Nov 2020; Statement of Community Involvement by Concilio; Planning Statement by DP9 Nov 2020.

RECOMMENDATION SUMMARY:

Grant conditional Outline Planning Permission following (i) referral to Mayor of London for his direction and (ii) completion of the section 106 Legal Agreement

[This recommendation is subject to Planning Committee having made a resolution to Grant Conditional Planning Permission subject to section 106 Legal Agreement for Item 4 on this agenda relating to Tottenham Mews (Ref 2020/5633/P)]

Applicant:	Agent:
Derwent Valley Property Development Limited & LMS Offices Limited, Network Building, 95-100 Tottenham Court Road, W1T 4TP	DP9 100 Pall Mall London SW1Y 5NQ

ANALYSIS INFORMATION

NETWORK BUILDING FLOORSPACE (GIA)		
USE	Existing GIA m²	Maximum Proposed GIA m²
Office	7085	17225
Retail	1156	521
Residential	844	0
TOTAL	9085	17746 (+8611sqm)

FLOORSPACE SUMMARY – TWO SITE PROPOSALS			
Building	Existing GIA m²	Proposed GIA m²	Uplift
Network Building	9085 (commercial/retail and residential)	Max 17746 (commercial and retail, Class E)	8611 GIA
Tottenham Mews	706 (non-residential institution)	2578 (residential Class C3 and workspace Class E)	1872 GIA
TOTAL	9791	20324	10483

OFFICERS' REPORT

Reason for Referral to Committee

Major development involving the construction of more than 1000m² of non-residential floorspace [clause 3(i)] and the making of an obligation or agreement under Section 106 of the Town and Country Planning Act 1990 or other legislation ('the obligation') that secures more than £50,000 of non-standard financial contributions or other public benefits of estimated capital value [clause 3(iv)].

This application is referable to the Mayor Of London under the provisions of category 1C of the Schedule to The Town & Country Planning (Mayor of London) Order 2008 : "Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."

Once Camden has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

Executive Summary

The re-development of the Network Building is part of a two site approach proposed by a pair of linked planning applications. This application is for outline planning permission to redevelop the site for commercial uses. The linked application, for 14-19 Tottenham Mews, proposes 23 off-site affordable homes (10 social-affordable rent and 13 intermediate rent) and affordable workspace, and is item 4 on the agenda.

The application seeks Outline Planning Permission to demolish the Network Building and the 7 adjacent homes and replace them with a new wholly commercial building with retail units on Tottenham Court Road. The outline application provides details of all matters except appearance and layout which are reserved. The outline application provides sufficient flexibility to construct either a life science building *or* an office building, and has been submitted to support the applicant's aspiration to incorporate life sciences within the building, but to provide flexibility in the event that no life science tenant is available at the time the building is brought forward.

Strategic policy supports the principle of a two site approach where it would deliver *'the greatest benefit to the key priorities of the Plan'*. Site specific policies identify commercial uplift as the priority land use aim for the Network Building, and strongly support new housing on the Mews site. The development would provide a net gain of 16 homes, although the overall number of homes delivered by the two site approach falls short of the capacity of the sites projected in the draft Site Allocation Local Plan, and should therefore be considered in the context of the Council's obligations through the Housing Delivery Plan. In addition, paragraph 11 of the NPPF is engaged, which puts a presumption in favour of approving schemes which deliver housing. Balancing the public benefits of the certainty of delivering 23 wholly *affordable* homes, all off-site, against the possibility of securing a greater number of homes on both sites as part of some future development proposal, officers consider that the delivery of 23 affordable homes carries greater weight and justifies the proposed approach to development across two sites. Planning permission for the Tottenham Mews development would need to be granted in order to contribute housing and affordable workspace to the

overall outcomes, which are necessary to justify the re-development of the Network Building for wholly commercial use.

The proposals are for a speculative development, which may come forward as an office building or a life-science enabled building. Draft policy KQ1 expects all major development in the Knowledge Quarter Innovation District to contribute to beneficial social and economic outcomes for local communities. Therefore the recommendation includes s106 obligations for end-user employment measures irrespective of the building type, including apprentices, work placements, obligations for London Living Wage for on-site employees and contractors and support for the Good Work Camden programme.

The new building would require the closure of Cypress Place as a public through route, however a financial contribution to local streetscape improvements would offset the loss of the public realm area. The closed route would support the on-site servicing of the urban block, keeping service vehicles away from pedestrians and cyclists, which is welcomed, and through proper management and care is likely to bring local community safety benefits at the same time.

The height, mass and bulk permitted by the parameter plans would cause no harm to local residential amenity, nor to the setting of the nearby conservation areas. Subject to control by conditions, the minor encroachments into the Mayor's protected viewing corridor from Parliament Hill to the Towers of Westminster Palace would not be significant enough to cause harm to the viewer's appreciation of the Towers.

The building would restrict some local views of the grade-II listed BT Tower as seen from Tottenham Court Road, causing harm to the setting of the designated heritage asset. This harm would be at the lower end of ***less than substantial harm***. The application of Section 66 of the Listed Buildings Act imposes a duty to treat harm to a designated heritage asset as a consideration to which the decision-maker must give '**considerable importance and weight**' when carrying out the balancing exercise, and that it is not open to the decision-maker merely to give the harm such weight as they think fit, in the exercise of their planning judgment. NPPF paragraph 196 instructs that "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal*".

Officers consider that despite the weight of presumption of s66 of the Listed Buildings Act, the package of benefits which would accompany the proposed development would outweigh the less than substantial harm to the designated heritage asset.

The issues raised by the Mayor in the Greater London Authority's (GLA) Stage 1 letter have been addressed through further clarifications and measures which would be secured by s106 legal agreement or by condition. Three control documents comprising Parameter Plans, Development Specification and Design Guidelines set out the requirements and guidelines for appearance and layout that reserved matters applications for the development of the building would need to comply with.

Two concurrent applications for Reserved Matters (RM) providing the appearance (design) and layout of the building, are assessed in the committee report for Items 5&6 on this agenda. The 1st RM application ('office RM') proposes an office building (Class E) of basement, ground and eight upper floors. The 2nd RM application (life-science-RM) proposes a life science building of basement, ground and seven upper floors.

1. SITE

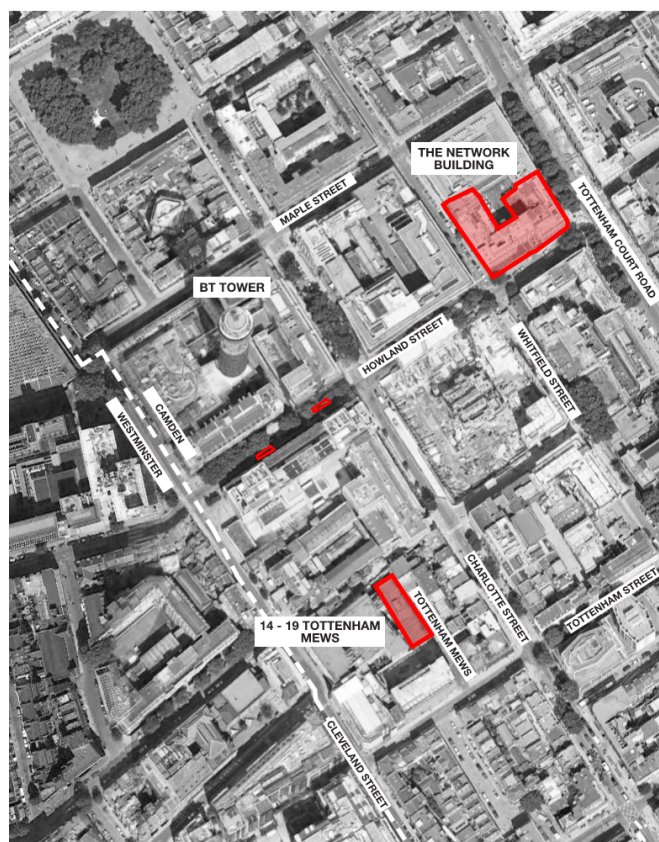


Figure 1.1: Site location (also showing Tottenham Mews site)

- 1.1 The Network Building (95-100 Tottenham Court Road), 76-80 Whitfield Street and 88 Whitfield Street occupy the southern half of the urban block bounded by Tottenham Court Road (east), Howland Street (south), Whitfield Street (west) and Maple Street (north).
- The Network Building provides office accommodation across 6 floors above retail units on the Tottenham Court Road elevation.
 - 76-80 Whitfield Street provides offices from ground to level 5.
 - The adjoining building at 88 Whitfield Street is an 8 storey block of 7 two-bed flats, designed and constructed as part of the re-development of the northern half of the urban block ('the Qube'), completed in c2007. The commercial building comprising the Qube itself is 90 Whitfield Street.



Figure 1.2 Network Building (Tottenham Court Road elevation)

- 1.2 Cypress Place runs north/south through the site as part of the public highway, linking Maple Street in the North to Howland Street in the South, via a single storey under-croft to the Network Building and the adjoining Qube Building. It is a secondary access road primarily used for servicing the Network Building and the Qube with a central open yard to the rear of each building. Cypress Place also provides access to the existing basement car park under 76-80 Whitfield Street.

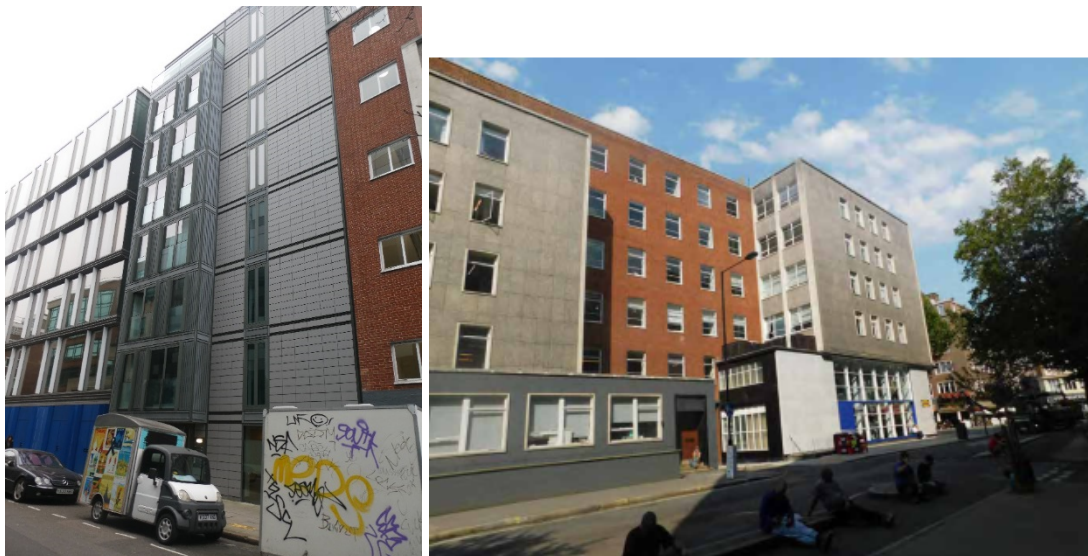


Figure 1.3: 88 Whitfield Street (left). South elevation to Howland St. (right)

- 1.3 Tottenham Court Road and Howland Street have recently seen significant intervention as part of the West End Project.

- 1.4 The majority of the site is within the protected view of the Mayor’s London View Management Framework (LVMF) Assessment Point 2B.1 (Parliament Hill) towards the Palace of Westminster.
- 1.5 The site is not in a Conservation Area, but is located within the setting of the Fitzroy Square, Bloomsbury and Charlotte Street Conservation Areas. Nearby listed buildings include BT Communication Tower (Grade II), Heal And Son Limited, including Habitat, 191-199, Tottenham Court Road (Grade II*), Glen House, 200-208 Tottenham Court Road (Grade II) and 2 Maple Street (Grade II).
- 1.6 Other site designations/attributes include:
- The highest Public Transport Accessibility Level rating of 6b
 - Site is in Central London Activities Zone
 - Tottenham Court Road side of the building is part of a Central London Frontage
 - Site is in the Knowledge Quarter Innovation District (see Site Allocations Local Plan 2020)
 - Site IDS1 in the Draft Site Allocations Local Plan
 - Opportunity site 12 in the Howland Street Character Area of the Fitzrovia Area Action Plan.



Figure 1.4 Extract from Fitzrovia Area Action Plan Character Area plan

- 1.7 The building currently provides offices on the upper floors, with the ground floor retail units on Tottenham Court Road occupied by Ikea, a pizza restaurant and Pret-a-manger (sandwich and coffee shop).

PROPOSAL

- 1.8 The application seeks outline planning permission to demolish the Network Building and the 7 adjacent homes and replace them with a new commercial

building. The outline application provides details of all matters except appearance and layout which are reserved.

1.9 Three control documents are submitted for approval which set out the requirements and guidelines that any future Reserved Matters applications for the development of the building would need to comply with. The documents are as follows:

- **Parameter Plans:** A set of 9 drawings comprising 6 plans and 3 elevations which define the extent of the building using maximum dimensions (for example height, width). These indicate a built envelope which would provide up to a maximum of 19,974 sqm GEA, to a maximum parapet height of 59.01m AOD (31.15m above street level);
- **Development Specification:** a table of proposed min- and max- floorspace and uses, and confirmation of building dimensions that would be permitted.
- **Design Guidelines:** contained within the Design & Access Statement, the Design Guidelines will inform and direct applications for Reserved Matters. The key topics covered by the Design Guidelines are:
 - Land use: locating ground floor uses and entrances.
 - Access & Servicing: location of servicing access points
 - Development massing: boundary limits at each level, heights, maximum basement depth, roof arrangements, measures to minimise impact on London View Management Framework (LVMF) viewing corridor

1.10 The outline parameters have been designed to allow for two different types of commercial building to be constructed: for use as an office building or for use as a life science building with a significantly higher proportion of ancillary space for plant equipment and supporting waste management etc.

1.11 The proposed Development is brought forward by Derwent Ltd. Derwent's vision is *'to create a new first class office building providing modern, attractive and flexible office accommodation at the Network Building site and high quality residential floorspace with a mix of tenures at the Tottenham Mews site'*.

1.12 Two concurrent applications for Reserved Matters (RM) providing the appearance (design) and layout of the building, are assessed in the committee report for Items 5&6 on this agenda. The 1st RM application ('office RM') proposes an office building (Class E) of basement, ground and eight upper floors. The 2nd RM application (life-science-RM) proposes a life science building of basement, ground and seven upper floors.

1.13 Both designs are understood to be proposed speculatively, without a specific intended occupier.

LAND USE SUMMARY

1.14 The development proposals are summarised in the table below, alongside the floorspace figures for the re-development of Tottenham Mews, which is linked to this application.

Use	Building	Existing (GIA m2)	Minimum (Life-science) (GIA m2)	Maximum (Office scheme) (GIA m2)
Non-residential institution	Network	0		
	T.Mews	706		
Office/labs	Network	7085	15,549 (lab) (Uplift:8464sqm)	17,225 (office) (Uplift:10140sqm)
	T.Mews	0	364 (Affordable)	364 (Affordable)
Retail/food and drink	Network	1156	487 Reduction of 669	521 Reduction of 635sqm
	T.Mews	0	0	
Non-residential TOTAL	Mews	706	364 (uplift:-342)	364 (uplift:-342)
	Network building	8241	16036 (uplift:7795)	17746 uplift:9505)
Housing	Network	844	0	0
	T.Mews	0	2214	2214
Residential TOTAL	Both Sites	844	2214 (1370 uplift)	2214 (1370 uplift)
Overall totals		9791	18614sqm (8823 uplift)	20324sqm (10533 uplift)

Table 1. Summary of floorspace mix and quantum of uses across the two sites

Revisions

1.15 The following revisions were received during the course of this application:

- Revisions to parameter plans relating to maximum boundary (building) lines at ground floor and roof level;
- Rooftop element moved further back along Howland Street;
- The plant screen has been set back at the northern end of Whitfield Street to reduce visibility from the street;
- Design Guidelines completely revised;

- Max building height in Development Specification revised;
- Commitment to increased area of blue roof, sustainable urban drainage systems (SUDs) and biodiversity/Urban Green Factor results;
- Detailed Basement Impact Assessment submitted;
- Clarification of Energy/Sustainability outcomes including revised Whole of Life Carbon statistics
- Fire Strategy submitted;
- Transport Assessment clarifications received (in response to TfL request); and
- Financial Viability Assessment revised to reflect financial contributions as part of proposed s106 legal agreement heads of terms

2. RELEVANT HISTORY

Application site:

Application for Reserved Matters, see related item 5 on Committee Agenda.

2020/5631/P: Reserved Matters details of layout and appearance for an office building comprising one basement level, ground floor and eight upper floors, and details required by conditions 4 (Basement Impact Assessment), 5 (Energy details), 6 (Design and access statement), 7 (Cycle facilities) and 37 (Waste & recycling), associated servicing and all necessary enabling works, associated with planning application reference 2020/5624/P [for the demolition of office building (95-100 TCR & 76-80 Whitfield St) and 7 flats (88 Whitfield Street) and construction of a new building to provide for a maximum of 17746 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'].

Application site:

Application for Reserved Matters, see related item 6 on Committee Agenda.

2020/5638/P: Reserved Matters details of layout and appearance for a building with lab-enabled use comprising one basement level, ground floor and seven upper floors, and details required by conditions 4 (Basement Impact Assessment), 5 (Energy details), 6 (Design and access statement), 7 (Cycle facilities) and 37 (Waste & recycling), associated servicing and all necessary enabling works, associated with planning application reference 2020/5624/P [for the demolition of office building (95-100 TCR & 76-80 Whitfield St) and 7 flats (88 Whitfield Street) and construction of a new building to provide for a maximum of 17746 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'].

14-19 Tottenham Mews, London W1T 4AA

Application for full planning permission, see related item 4 on Committee Agenda.

2020/5633/P : Erection of a six storey building (and basement) to provide office (use Class E) at part ground and basement levels and self-contained flats (use class C3) at ground and floors one to five; with associated landscaping, cycling parking and

enabling works. *CONSULTATION NOTE: Application is linked to redevelopment of Network building and flats (ref 2020/5624/P).*

The Qube (101-107 Tottenham Court Road, aka 90 Whitfield Street)

PSX0104726 : planning permission was granted 13th January 2004 for “Alterations and extension involving 6 storey extension at rear to provide additional office (class B1) floorspace and additional plant at roof level. Partial change of use of existing office floorspace to form 5no residential flats (class C3) fronting Whitfield Street. Elevational changes, involving recladding, additional retail space at ground floor, including relocation of office entrance to Whitfield Street frontage”

3. CONSULTATION SUMMARY

3.1 *Historic England*

- Existing buildings are not of any special architectural or historic interest.
- The site is in the setting of multiple conservation areas, being in close proximity to the Bloomsbury, Fitzroy Square and Charlotte Street Conservation Areas.
- The site falls within the protected view from Parliament Hill to the Palace of Westminster World Heritage Site (London View Management Framework Assessment Point 2B.1). The Palace is a Strategic Landmark and is subject to a Landmark Viewing Corridor and Wider Setting Consultation Area, forming a Protected Vista. All three towers of the Palace are visible in this strategic view and the majority of the site is within the designated viewing corridor.
- The proposals conflict with the adopted policy of the LVMF SPG and the emerging New London Plan policy, as the development rises above the viewing corridor threshold of the Protected Vista. Although the possible height infractions are relatively minor, the width of the proposed development and its positioning in front of the Victoria Tower in middle ground views could result in it beginning to have an undesirable visual impact.
- The nature of the visual impact should be clarified with alternative visuals (taken in winter for example). LVMF SPG images are slightly clearer than submitted ones and allow individual buildings to be read in the middle ground.
- Nevertheless we consider it unlikely that there would be an adverse impact on the Outstanding Universal Value of the World Heritage Site. The visual relationship between the towers of the palace would clearly be maintained and the proposed development may not be perceptible in reality.
- The defined vista is designed to prevent incremental and cumulative impacts and proactively encourage the removal of existing developments which presently interrupt protected vista thresholds.
- Local Planning Authority should be satisfied that all reasonable opportunities to avoid breaching the threshold of the protected vista have been taken in determining the parameters of the proposed outline development.

Historic England Recommendation

- Further visual studies should be undertaken to clarify the impact, and encourages that further opportunities to reduce the maximum height of the

proposed outline parameters are explored where possible.

- Camden should take these representations into account and seek amendments, safeguards or further information as set out in our advice.

3.2 **Greater London Archaeological Advisory Service (GLAAS)**

- The proposal is unlikely to have a significant effect on heritage assets of archaeological interest.
- The site does not lie within an archaeological priority area.
- Having reviewed the submitted information it is clear that the archaeological potential for this site would be limited to evidence of 18th century quarrying activity and the fragmentary remains of subsequent houses and buildings. Such remains would be of low significance.
- Although the proposals include the excavation of extensive, new basement levels, the limited archaeological potential means that the proposed development would not result in a significant archaeological impact.
- No further assessment or conditions are therefore necessary.

3.3 **Crossrail 2**

- The application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.
- Crossrail Limited does not wish to make any comment on the application as submitted.

3.4 **TFL Infrastructure safeguarding**

- No objection in principle to planning application but there are a number of potential constraints from location close to underground tunnels and infrastructure.
- Request condition is added to planning permission to secure details to demonstrate to the satisfaction of LUL engineers that the development will not have any detrimental effect on our tunnels and structures either in the short or long term.

Officer comment: condition 17 secures this

3.5 **Thames Water**

- On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application
- The proposed surface water discharge rate is far too high for the size of the site and needs to be reduced closer to the greenfield runoff rate of 2.4l/s.
- With regards to foul water we need the proposed and existing point of connection and the proposed pump rate for the basement flows.
- Request conditions requiring developer agree:
 - Method for meeting waste water infrastructure needs of the development.
 - Method for meeting the surface water infrastructure needs of the development.
 - Piling method statement which ensures protection of underground water infrastructure.

Officer comment: conditions 33, 34 and 35 secure these measures

Greater London Authority – Stage 1 feedback (summarised)

3.6 Principle of development:

- The redevelopment of the site within the CAZ to provide an office or life-science scheme to include retail floorspace is acceptable in accordance with Policies SD4, E1 and E8 of the London Plan (2021); subject to addressing issues relating to the loss of housing, heritage, transport and environment.

3.7 Central Activities zone

- No affordable workspace is proposed on site, which does not align with the expectations of Policy E2 of the London Plan (2021). However the applicant is proposing the provision of 375sqm of affordable workspace at 14-19 Tottenham Mews. In line with Policy E3 of the London Plan 2021, the Council should ensure rents are maintained below the market rate for that space for a specific social, cultural or economic development purpose. The s106 should appropriately link the two sites.
- Retail uses would be provided at ground floor which is welcomed. The proposed development reduce the retail offer by 635sqm to 521sqm which is related to retail floorspace currently provided at basement level and is unlikely to be used for trading. The proposed loss of retail does not raise any strategic concern.

3.8 Housing:

- The redevelopment of the site results in the loss of 7 private residential units. In order to address this loss and meet local office policy, the applicant is proposing to provide 23 affordable units on a linked site at 14-19 Tottenham Mews. In order to comply with Policy H8, the outline application must be linked to the Tottenham Mews site in the s106.

3.9 Urban design:

- The proposals would result in a slight increase in height when compared to the existing building, and in line with the Camden Local Plan, is not considered a tall building. The increase in quantity and quality of public realm is considered a significant benefit of the scheme. The facade design and materials palette are acceptable and can be secured through the parameter plans.
- The maximum extent of the proposals is 32.28 metres above ground and 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 acceptable.
- The parameter plans suggest that the upper floors could cantilever over the pavement by up to 1.7 metres which is a significant oversailing over the public highway and will transform the character of Howland Street. Subject to transport considerations, the detailing of the cantilever and soffit should be conditioned to ensure a high quality of design is achieved and secured.
- The location of the ground floor uses is acceptable and these uses are likely to significantly improve the street-level experience on Howland Street and Fitzroy Street (sic) in particular. The integration of street furniture into the ground floor facade is a welcome addition and is supported.

3.10 **Strategic views:**

- The proposed development would be within the viewing corridor from Parliament Hill to the Palace of Westminster and as such is contrary to Policy HC4. The applicant should ensure that all opportunities to reduce encroachment into the view and the impact on the World Heritage Site (WHS) are explored. Further information is required setting out the impact on the WHS.

3.11 **Public realm**

- The increase in both quantity and quality of public realm, including the setback on the ground floor, is considered a significant benefit of the scheme. The public realm strategy should include indicative plans for improvements beyond the site boundary where appropriate, and the mechanism for delivery of these improvements should be secured through s106 agreement.
- The decision to stop up Cypress Place is a missed opportunity to improve the permeability of the area by creating a new pedestrian route through a large city block. However, the closure does not create design issues at a strategic scale.

3.12 **Heritage:**

- The increase in massing would result in the visibility of the slender lower section of the Grade II listed BT Communications Tower being obscured by the upper levels of the development and less than substantial harm would be caused to this heritage asset. The applicant should clearly set out the public benefits of the scheme so that GLA officers can assess whether the harm is outweighed by benefits. In addition, the applicant should confirm that other heritage assets and conservation areas identified but not assessed would not be harmed as a result of the proposal.

3.13 **Environment:**

- Additional energy efficiency measures should be modelled. The applicant should confirm the carbon shortfall and offset payment, increase the UGF score and provide information regarding the removal of trees. Further information is required on CES, heat pumps, district and communal heating and a WLC is required.

3.14 **Transport:**

- An amended TA should be provided to analyse trip generation by station, line and direction. Concern is raised regarding access via Cypress Place and potential safety hazards that may arise. Short stay cycle parking should be increased, and existing car parking bays should not be re-provided. A Travel Plan, Delivery and Servicing Plan and Construction, Demolition and Management Plan should be secured.

3.15 **Recommendation:**

- That Camden Council be advised that the application does not yet comply with the London Plan (2021) for the reasons set out in the Stage 1 report; however, the possible remedies set out in that paragraph could address these deficiencies.

Charlotte Street Association

Sustainability

- The demolition of the existing and construction of the new building will generate a large amount of carbon in the critical years of the climate emergency 2030/2050.

Mixed Use

- The scheme changes the building from a mixed to a single use.

Housing

- The amount of Housing proposed falls materially short of Plan requirements of 6205sqm (5225sqm the uplift of Commercial floor space plus 800sqm replacement for the of loss of 8 unit) ; of this 2979 should affordable. This equates to a requirement of 62 units including 27 affordable.
- The scheme includes no market housing and only 23 affordable units (2340sqm) all off site.

Public Open Space

- The Plan requirement for POS amounts to 440 square metres. None is offered on the applicant's land. The area proposed for the tree planting is in the Council's ownership. Furthermore the area of public realm presently provided in Cypress Place is not being replaced but subsumed in the new building.
- Not only is Fitzrovia identified as an area with a critical shortage of POS. The Site is in close proximity to an area of high deprivation to the north.

Design

- Unsurprisingly given its 40% increase in floor space the proposed building represents gross overdevelopment in terms of height and bulk. Together with its banal design it is wholly without merit and would be damaging to its surroundings. Beauty or delight are not qualities associated with this monolith.

Individual Responses

3.16 Site notices were displayed from 9th December 2020 inviting comments until 2nd January 2021. A local press advert was placed on 10th December 2020 inviting comments until 3rd January 2021. One letter objecting to the proposals was received.

3.17 Principle of demolition and rebuild

- Object to demolish-and-rebuild rather than a refurbishment because of environmental harm.

3.18 Mixed use at Network Building

- Policy requires a mix of housing and commercial use on the site. However, the plans would remove the existing seven flats making the entire street block a purely commercial site.
- The proposal should, instead, deliver an increase in housing on site not remove it. Object to this aspect of the planning application.

3.19 Housing

- Strongly object to the lack of housing and affordable housing that would be created from this development. Under policy the housing target is about 62 homes with up to 27 affordable homes, however only 23 homes are offered and just ten of these at social rent. The proposals deliver a net loss of market homes and an insufficient number of affordable homes.

3.20 **Public open space**

- Policy A2 requires 440 square metres of open space to meet the demands of 595 additional jobs compared to the existing building, plus additional space to make up for the loss of public realm and permeability through the site from the stopping up of Cypress Place. However the proposals offer nothing by way of policy-compliant public open space.
- Instead the application proposes removing the existing plinth that contains the underground car park vents, and several public parking spaces to widen the pavement in Whitfield Street; and add some seating, plant some trees, and create some rain gardens. Private amenity space on terraces does not make up for the lack of public open space particularly in an area with a deficiency of such space.
- Object to the lack of any public open space created from the development of this site.

3.21 **Network Building design**

- The development is the maximum that could possibly be fitted on this site right up against the height restricted by the strategic viewing corridor; with the Howland Street and Whitfield Street elevations pulled forward of the existing frontages. This is overdevelopment particularly on the Whitfield Street elevation that towers above the modern buildings which are its immediate neighbours, and creates a canyon-like effect along this section of the street. This will have a very negative effect on the street and the amenity of residents opposite to the site to the north on the corner of Maple Street. I object to this aspect of the application.

APPLICANT'S OWN CONSULTATION

3.22 The submitted Statement of Community Involvement (SCI) sets out the engagement and consultation measures taken by the applicant. Between August and October 2020 the applicant and their design team engaged with local stakeholder groups. Local engagement initiatives included:

A digital consultation website:

- Live from 5th October 2020
- Publicised by letters delivered to 1,745 addresses
- 278 people viewed the online exhibition website
- Three (3) completed surveys were received as feedback (1 resident, 1 local business/employee/1 community representative. Two of the respondents supported the proposals and one strongly objected.

Met representatives from **Bloomsbury Conservation Area Advisory Committee.**

- Attended by the Chair and representatives
- No major comments but welcomed the early consultation.

Received a response from the **Fitzrovia Neighbourhood Association**.

- Held a digital meeting on 8th October.
- Attended by a representative who made a number of comments regarding the scheme.

STRATEGIC PANEL

3.23 Two options for redevelopment of the Network Building and Tottenham Mews were presented to the *Strategic Panel on Emerging Planning Proposals* in Sept 2019.

- **Option 01:** Commercial redevelopment of the Network Building, with Whitfield Street homes relocated to Tottenham Mews alongside additional market flats and 15 affordable homes (5 social rented and 10 intermediate).
- **Option 02:** Commercial redevelopment of the Network Building, with Whitfield Street homes retained on site. Mix of 23 new homes at Tottenham Mews to be 7 social rented, 4 intermediate and 12 market flats.

3.24 The Panel feedback is summarised below:

- Support the principle of re-development where it brings wider public benefits alongside commercial priorities.
- Housing and open space are key priorities for the local communities. Proposals should deliver tangible benefits which make a real difference to local people's quality of life, in particular genuinely affordable homes, affordable workspace and access to improved public realm and open space, whilst delivering sustainable buildings which respond positively to their context.
- First preference is to provide on-site housing, however we may also support a two site approach where it responds to Camden's housing targets with a significant housing component. Given the limited development capacity of the Mews site, our priority is for the proposals to maximise the opportunity to provide housing at London Affordable Rents, including crucially homes for families. Our expectation is that all the homes provided on the mews should be at London Affordable Rents or at the least all the additional homes.
- Based on the two options, the scenario which keeps the market flats on Whitfield Street delivers the most housing at London Affordable Rents and would therefore appear to bring the most public benefit. However the relatively small number of genuinely affordable new homes on the Mews site, and the absence of an affordable workspace proposition are not sufficient to balance the harm from the relocation of the market homes and the loss of public space in Cypress Place.
- In the event that Knowledge Quarter uses are proposed we would expect to see the design and specification of the building tailored to complement the key knowledge economy activities identified in the Science & Innovation Audit.

- We expect a strong employment, skills and business support package including a meaningful element of affordable workspace. In addition to a proportion of the commercial uplift on the Network Building site being provided as affordable workspace we would encourage you to explore maximising options for affordable workspace as the priority use within the lower levels of Tottenham Mews rather than focusing solely on healthcare facilities.
- Fitzrovia is acknowledged as having a deficit of good quality public open space. We expect proposals to be ambitious and we are keen to understand how the environments of Howland Street and Whitfield Street could be made greener and better for pedestrians. We encourage you to work further with the Council's transport and highways teams to explore further options.

DESIGN REVIEW PANEL 11th Sept 2020

3.25 Summary

- The panel is impressed with the architectural quality of proposed designs for the Network Building, but suggests refinements that will enhance the design in its setting.
- If the closure of Cypress Place and additional bulk / footprint are to be justified, the proposed public realm improvements must return significant value to the area. The panel encourages 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. The comments are expanded below.

3.26 Massing

- Recommend pushing massing back at key points to improve its townscape quality.
- Suggest setting back floors six and seven to respond to the height of the Qube.
- Note that the stopping up of Cypress Place requires provision of sufficient areas of high quality public space in its place.
- Suggest moving building line of upper floors back along the Howland Street frontage and setting ground floor level further back to provide a more generous pavement width.
- Note that office entrance on Howland Street is positive and suggests that the curve in the façade line could be more pronounced, to create additional pavement at the threshold.

3.27 Architecture

- Support the proposed materiality and architectural expression, in particular the asymmetric profile of the pre-cast concrete façade panels.

- Note that the corner on Tottenham Court Road is important and highly visible. Suggests that the curved corner treatment at ground and first floor level could be continued through the full height of the building.
- Note that the building could do more to reflect the scale and variety of Whitfield Street and should avoid a completely closed façade at street level. Suggests that the ground floor should aim to offer a more bespoke and public element to the street, for example by including smaller scale entrances and shopfronts.

3.28 Landscape design

- Encourage the incorporation of London Plane trees rather than Field Maples along Howland Street to provide continuity with Tottenham Court Road and the trees further west on Howland Street.
- Recommend that the building should not step forwards at upper floor levels so that street trees have sufficient space at canopy level.
- Suggest 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.
- Encourage seeking further opportunities to include planting at roof level, to achieve the required urban greening factor.
- Identify importance of agreeing future maintenance responsibility with Camden to ensure planting and public realm are maintained.
- Recommend that green amenity spaces could be considered inside the building, perhaps at the corners, to provide a further level of benefit to employees.

4. POLICIES

- 4.1 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these are expected to be applied. It must be taken into account in preparing the Development Plan, and is a material consideration in planning decisions. The revised NPPF was published 24 July 2018 and updated on 19 February 2019.
- 4.2 The Camden Local Plan was adopted by the Council on 3 July 2017. Other local documents which are of relevance include the Proposals Map and Camden Planning Guidance (CPG).
- 4.3 The site identified as IDS1 in the 2020 consultation draft of the Site Allocations Local Plan (SALP). The text of the draft policy is provided in Appendix A. The 2020 draft of the SALP has completed public consultation and is under review. The SALP must be consistent with development plan policy. Once the SALP text reaches its final adopted form, policy IDS1 will supersede the relevant policy in the FAAP. The SALP has some material planning weight.
- 4.4 The site is site 13 in the Howland Street character area of the Fitzrovia Area Action Plan (March 2014). The London Plan 2021 and the Mayor's Supplementary Planning Guidance (SPG) are important considerations as are

sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

4.5 In making any decisions as part of the planning process, account must be taken of all relevant statutory duties including section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 149 of the Equality Act 2010 is also relevant to the determination of the applications. It sets out the Public Sector Equality Duty, which states that a public authority must have due regard to eliminate discrimination, harassment and victimisation; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

4.6 The relevant **Camden Local Plan 2017** policies are listed below:

- G1 (Delivery and location of growth)
- H1 (Maximising housing supply)
- H2 (Maximising the supply of self-contained housing from mixed-use schemes)
- H4 (Maximising the supply of affordable housing)
- C1 (Health and wellbeing)
- C5 (Safety and security)
- C6 (Access for all)
- E1 (Economic development)
- E2 (Employment premises and sites)
- A1 (Managing the impact of development)
- A2 (Open space)
- A3 (Biodiversity)
- A4 (Noise and vibration)
- A5 (Basements)
- D1 (Design)
- D2 (Heritage)
- D3 (Shopfronts)
- CC1 (Climate change mitigation)
- CC2 (Adapting to climate change)
- CC3 (Water and flooding)
- CC4 (Air quality)
- CC5 (Waste)
- TC1 (Quantity and location of retail development)
- TC2 (Camden's centres and other shopping areas)
- TC4 (Town centre uses)
- T1 (Prioritising walking, cycling and public transport)
- T2 (Parking and car-free development)
- T3 (Transport infrastructure)
- T4 (Sustainable movement of goods and materials)
- DM1 (Delivery and monitoring)

4.7 Site Allocations Local Plan (SALP) (Draft, March 2020)

- KQ1 Supporting growth in the Knowledge Quarter Innovation District

- IDS1 Network Building

4.8 Fitzrovia Area Action Plan (March 2014)

4.9 Relevant supplementary planning guidance is listed below:

Camden Planning Guidance (CPG):

CPG Access for all

CPG Amenity (Jan 2021)

CPG Air Quality (Jan 2021)

CPG Basements (Jan 2021)

CPG Biodiversity

CPG Design (Jan 2021)

CPG Developer contributions

CPG Employment sites and business premises (Jan 2021)

CPG Energy efficiency and adaptation (Jan 2021)

CPG Planning for health and wellbeing (Jan 2021)

CPG Public open space (Jan 2021)

CPG Town centres and retail (Jan 2021)

CPG Transport (Jan 2021)

CPG Trees

CPG Water and flooding

5. ASSESSMENT

5.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

6	Land Use Principles and cascade of two site approach
7	Design, Character and Appearance, Impact on Heritage Assets Introduction, context and opportunities Building design Heritage assessment
8	Open space, Landscaping, Trees, Nature and Biodiversity Impact on Public Open Space Landscaping/Biodiverse Roofs/ biodiversity/trees
9	Basement
10	Neighbouring Amenity Daylight/sunlight, overshadowing, outlook, light pollution Microclimate / Privacy, noise and vibration impacts
11	Transport and Highways Car & Cycle parking / Trip generation & Travel planning / Deliveries and servicing / Construction management Public realm improvements/ Pedestrian, Cycling and Environmental improvements/ Highway works
12	Sustainable Design and Construction
13	Air Quality
14	Flooding and Drainage

15	Accessibility
16	Community Safety
17	Land Contamination and Archaeology
18	Waste Management
19	Economic Benefits, Local Employment and Procurement
20	Health and Wellbeing
21	Equality
22	Fire Safety
23	Phasing and Delivery
24	Community Infrastructure Levy (CIL)
25	Conclusion
26	Recommendations
27	Legal Comments & Conditions
28	Informatives
App. A	Draft policy text from Site Allocation Local Plan

6. LAND USE

- 6.1 The development proposes an intensification of employment activities on site by removing the on-site housing and providing a larger building in commercial use only. The development is part of a two site approach to responding to planning policy, with housing provided off-site. A number of development plan policies therefore apply to the land use considerations.
- 6.2 Policy G1 expects the most significant growth in the borough be delivered through a concentration of development in the growth areas, in particular Central London and within the Central London Zone (CLZ). The policy identifies that the Council can support the multi-site approach *“as part of an agreed coordinated development approach where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan”*.
- 6.3 The site features as FAAP opportunity site 13 which identifies the land use priorities for the Network Building as:
- Retention of business uses.
 - Matching non-residential uplift with housing addition, subject to policy criteria for mixed-use development.
 - Support for additional retail space.
- 6.4 The Draft Site Allocation Local Plan Policy IDS1 (see Appendix A for full consultation draft wording) identifies the Network Building and 88 Whitfield Street as allocated for office and retail led development that also retains and adds to existing permanent self-contained housing.

Mixed-use policy: requirement for housing?

- 6.5 Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) establishes the principle that non-residential development in the Central London Zone should generally include self-contained homes as part of a mix of uses. The policy sets out a number of key criteria to be taken into account when considering whether on-site housing is a requirement of the development.
- 6.6 Many parts of Fitzrovia have local resident populations, but the site falls within an area where larger office buildings predominate and housing is not so common. However, there are no particular site constraints or characteristics which would mean housing would *not* be a suitable use as part of an overall approach to redevelopment and in general there are no principle incompatibilities between housing and office or lab-enabled facilities sharing the same city block on this site. These considerations confirm that the redevelopment of the Network Building site must include a contribution to housing, in accordance with the first part of policy H2.

Mixed-use policy: On-site or off-site housing?

- 6.7 The second part of policy H2 considers whether the housing should be provided on-site or off-site. The key issue relates to criteria (h – i), and in particular the economics and financial viability of the development.
- 6.8 During pre-application discussions officers emphasised the policy aims of securing mixed use developments in Central London. Various scenarios were tested during the pre-app including the retention of the existing homes on Whitfield Street and options to incorporate new homes into additional development on site. The testing concluded that the additional cores, service risers and structural issues would compromise the commercial floors and undermine the developer's overall aim of providing large, efficient and flexible commercial floorplates.
- 6.9 The developer has consistently raised concerns about the impact on the economic feasibility of the overall development if the quality and quantity of their commercial floorspace prerogatives are compromised by on-site housing. As a result Tottenham Mews is proposed as the donor site for providing the housing component of the overall development. The Mews would provide wholly affordable homes, of which 10 are Social-Affordable rented homes and 13 are Intermediate Rent. A summary of the outcomes of the housing assessment (quantum, mix, tenures) for Tottenham Mews, is provided below.
- 6.10 The applicant submitted a Financial Viability Assessment (FVA) to demonstrate the viability of the scheme. The FVA was updated during the assessment to reflect the financial contributions in the s106 legal agreement and the revisions to both the building and the development at Tottenham Mews. The outcome of the FVA is that the development proposals (across the two sites) are not viable. The FVA has been audited by BPS, the Council's independent viability

consultants. BPS conclude that the scheme currently generates a deficit of c. -£18.57 m when the developer profit targets [15% on GDV for all commercial revenue and 6% for the affordable residential revenue] are considered. This deficit equates to 7.5% of the schemes Gross Development Value. BPS's report is provided in Appendix B to this report.

- 6.11 The FVA comprises an evaluation for each site, and it is evident that neither development proposal is viable. The -£18.57M deficit is split between development sites, with the Tottenham Mews affordable housing scheme having a deficit of -£9.86M and the Network Building a deficit of -£8.76M. BPS note that their sensitivity analysis shows that the Network Building office and retail rents would need to increase by c. 9% in order for the scheme to reach a breakeven position. The viability issues associated with the development give considerable weight to criterion (i) (*'the economics and financial viability of the development'*) of policy H2 when considering how best to apply flexibility towards the location of housing provision.
- 6.12 Taking the housing CPG to its ultimate conclusion, developers should exhaust the potential for off-site locations to provide the remainder of the shortfall until such time as other factors such as viability preclude further progress. Housing SPG acknowledges the difficulties with findings additional sites (para 5.28) "*in recent years opportunities to acquire potential delivery sites at relatively low costs have diminished, and it has no longer been possible for developments to meet initial off-site targets in full*". The Financial Viability Appraisal demonstrates that the development proposals are not viable and therefore the proposed housing is the full extent of the development's ability to contribute to housing targets. It furthermore demonstrates that the development is delivering the maximum reasonable amount of affordable housing, in a suitable mix of tenures and unit sizes, as required by policy H4 (maximising the supply of affordable housing).
- 6.13 The proposals fall short of the housing requirements and therefore in order to capture potential future improvements in the viability of the development, BPS recommend securing a Deferred Affordable Housing Contribution (DAHC) mechanism in the s106 legal agreement. This would recover contributions to the outstanding payment in-lieu costs for the housing shortfall (see Table 6.1 for the maximum amounts) in the event that the viability of the schemes improves to provide a surplus. This is consistent with text supporting policy H2 (3.65). The DAHC mechanism would be guided by the Housing CPG, which expects a late-stage review once the development has been completed and a substantial proportion has been let.

Network Building & Tottenham Mews	Minimum uplift (Life-science scheme)	Maximum uplift (Office-scheme)
Total uplift across two sites	8823sqm	10533sqm
Housing requirement (50% of total uplift)	4412sqm	5267sqm
Market housing requirement (add 844sqm for displaced housing)	3050sqm	3477sqm
Market housing shortfall (payment in-lieu @ £1500/sqm)	3050sqm (£4,575,000)	3477sqm (£5,215,500)
Affordable housing requirement (50% of housing target)	2206sqm	2633sqm
Affordable housing (AH) provision	2214sqm	2214sqm
Affordable housing shortfall (payment in-lieu @ £1500/sqm)	Provision exceeds target	419sqm (£628,875)

Table 6.1: Deferred housing contribution requirements

- 6.14 It is understood that the applicant purchased Tottenham Mews to provide housing as part of the re-development of the Network Building. Tottenham Mews is c. 200m from the site as the crow flies, and would deliver a net gain in housing in the borough, notably affordable housing in the same Ward as the Network Building. Tottenham Mews has been purchased by the applicant to enable a 2-site approach and so there is a strong degree of certainty attached to delivery of the new housing alongside the commercial development at the Network Building. This is a positive factor in considering the principle of off-site housing and is consistent with the preferences for certainty of delivery set out in the supporting text of policy H2.
- 6.15 The outcome of the viability assessment suggests that it is highly *unlikely* that the Mews site would yield 23 affordable homes as part of a conventional single-site development proposal for the Mews, and therefore the current two-site approach represents a more certain outcome for the delivery of this many affordable homes. The developer's position has consistently been that moving the residential floorspace off-site from 88 Whitfield Street enables a greater amount of non-residential floorspace at the Network Building, which improves the viability of the development as a whole and in turn allows for more affordable housing to be delivered than would have otherwise been possible. Officers understand that freeing up additional space for commercial uses on site is key to enabling the development to proceed, and in the current development context

it seems unlikely that redevelopment of the Network Building as a standalone site would deliver additional homes.

Housing targets

6.16 For the Central London Area policy H2 requires major developments to contribute housing across 50% of all additional floorspace, subject to certain considerations. An affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings, which applies in this instance **Table 6.2** summarises the housing targets for two development approaches: (A) a theoretical single-site approach with **on-site** housing and (B) the development proposals for a two-site approach, with **off-site** housing. Two development densities are shown for each approach: an office building providing maximum floorspace, and a lower density life-science building. **Table 6.2** demonstrates that the two site approach expects a greater quantum of new homes than the single site approach.

Development scenario		Minimum uplift (Life-science scheme)	Maximum uplift (Office-scheme)
A. Single site approach: Network Building only (theoretical)	a. Non-residential uplift on-site only	7795sqm	9505sqm
	b. Housing requirement (50% of uplift)	3898sqm	4753sqm
	c. Affordable housing requirement (50% of housing)	1949sqm	2376sqm
B. Two site approach: Current applications for Network Building & Tottenham Mews	d. Total uplift across two sites	8823sqm	10533sqm
	e. Housing requirement (50% of total uplift)	4412sqm	5267sqm
	f. Affordable housing requirement (50% of housing target)	2206sqm	2633sqm
	g. Market housing requirement (add 844 existing)	3050sqm	3477sqm

Table 6.2: Housing requirements (GIA sqm)

- 6.17 The proposed development would deliver **2214sqm** of off-site affordable housing. Comparing this quantum with scenarios A and B in **Table 6.2** it is evident that if the life-science building is constructed the affordable housing provision of **2214sqm** would exceed the policy requirements for affordable housing whether delivered on-site or off-site (row c and f respectively). However, if the office building is constructed, with its higher housing targets, the off-site affordable housing delivery would fall 162sqm short of the on-site (2376sqm) target in row c, and 419sqm short of the off-site (2633sqm) target in row f.
- 6.18 Policy H2 provides flexibility for supporting off-site housing based on the presumption that the housing offer would be better in terms of quantity and/or quality than a single site approach. While on-site housing concept scenarios were examined during the pre-app, the information available was not sufficient to draw detailed conclusions about the *quality* of potential on-site housing options. The committee report for Tottenham Mews concludes that the affordable housing would meet the expectations of policy H4 in respect of tenure mix. Furthermore the housing layout and mix of unit sizes targets high-priority 2- and 3-bed units for 4- and 5- person households, and includes and includes two 2b-4p fitted wheelchair homes at ground floor, which are strongly welcomed. Therefore, while the proposed two-site approach will provide no market homes, the off-site arrangement would deliver good quality affordable housing that would exceed the offsite requirements for the life-science scenario.
- 6.19 Giving considerable weight to the financial viability of the scheme and the tenure and quality of the housing in Tottenham Mews, officers conclude that the certainty of 23 good quality *affordable* homes at the Mews (a net gain of 16 homes across the two sites) means that the housing component of the development would be more appropriately provided off-site, in accordance with policy H2.
- 6.20 The FAAP land use principle of matching commercial uplift with new housing on site is consistent with the aims of policy H2 and as concluded above, the delivery of off-site housing meets the overall objectives of the policy. The SALP presumption for retaining the existing housing on site echoes the aims of housing policy H3 (protecting existing homes) and the mixed-use aims of policy H2. While the re-development of the Network Building would see the removal of the on-site market housing, the overall improved viability would enable a net gain in housing across the two sites compared with the alternative scenario of developing the sites individually. The proposals are therefore in accordance with policy H3 and the FAAP.

Retail uses

- 6.21 The site frontage to Tottenham Court Road and the corner with Howland Street are designated by policy TC1 (Quality and location of retail development) as Central London Frontage. In this location the policy has a strong presumption

in favour of retaining retail shops in the frontage. The existing site has three tenants, with Ikea occupying the large corner site including a mezzanine and a pizza restaurant and Pret-a-manger sandwich shop in the other two shop units.

- 6.22 The Development Specification proposes 487-521sqm GIA of Class E (A retail, B food & drink) at ground floor level on the Tottenham Court Road frontage and corner of Howland Street. This would be a reduction of 635-669sqm of retail space from the existing arrangement, most of which is accounted for by the loss of ancillary basement space. The location of the retail space and zones for entrances is shown on the Outline Parameter Plans. Despite the reduction the development would maintain the key principle of providing a strong retail function on the Central London Frontage, as required by policy.
- 6.23 Use Class E is very broad in range but the application documentation and Development Specification clearly state that the proposal along the frontage is for uses within parts A (retail) and B (on-site food & drink) of Class E. The outline parameters allows for flexibility to accommodate either a single large tenant or multiple smaller occupiers. This is generally consistent with Principle 5 of the FAAP which states that larger retail spaces should be located within the Central London Frontage whilst smaller and independent shops should be located away from Tottenham Court Road within the neighbourhood centre.
- 6.24 Policy TC4 expects food and drink uses to take account of local character, function, vitality and viability and the amenity of neighbours. Camden's CPG on retail uses expects the lawful use of a minimum of 80% of shop units in frontages on Tottenham Court Road to be in retail use. The outline application does not specify the number of proposed shop units along the frontage so the number may change from the existing 3. The site is part of a frontage of 9 shop units. Two units in the frontage operate lawful food & drink uses (78% of the units).
- 6.25 Mindful of the strong policy emphasis on retaining retail uses, condition 8 secures a minimum of 487sqm of retail floor space of which food & drink uses shall occupy no more than one shopunit in no more than 50% of the floorspace. The condition would also ensure that ground floor frontage in retail use shall at all times include a shopfront display to the street.
- 6.26 The illustrative landscaping material shows tables and chairs on the Tottenham Court Road frontage which is broadly consistent with the existing arrangements, however the area falls outside of the redline and would require a separate Tables & Chairs application for the relevant license in order to place furniture on the public footway.
- 6.27 With condition 8 in place, the retail proposals would comply with policies G1 (Location of growth), A1 (Amenity), TC1 (Quantity and location of retail), TC2 (Camden's Centres) of the Local Plan, policy IDS1 (Network Building) of the draft SALP and FAAP opportunity site 13.

Employment uses

- 6.28 Draft SALP policy KQ1 gives direction to strategic objectives for the Knowledge Economy that should be sought for major commercial re-development of sites within the Knowledge Quarter Innovation District. The outline application seeks approval for a speculative development, which has the flexibility to deliver offices or a life-science building. With reference to policy KQ1, the application documents state that the applicant has:
- undertaken research into integrating life-sciences into the building;
 - prioritised floorspace which is suitable for priority growth sectors within the district for life sciences ; and
 - designed the floorspace to reflect current and emerging needs of the knowledge economy.
- 6.29 In response to KQ1 Tottenham Mews would provide 443sqm (GEA) of affordable workspace. This is a positive component of the two-site proposals and is discussed in more detail in section 19 (economic benefits), which discusses how the s106 legal agreement would secure inclusive economy and local employment benefits from the development, consistent with policy KQ1. For this speculative development, specific knowledge-economy outcomes would be largely dependent on future (unknown) occupiers and their participation in Knowledge Economy activities. It is considered that both development outcomes (office or life-science building) have the potential to support the wider aims of the Knowledge Quarter Innovation District, in accordance with policy KQ1, with the life-science building implicitly providing a greater opportunity for such participation. The commercial proposals therefore generally accord with policy KQ1.

Housing as a priority land use

- 6.30 Camden's Local Plan policies seeks to ensure that assessed housing needs to 2031 are met; the requirement is for the provision of 16,800 additional homes, equivalent to 1,120 additional homes per year. Policy G1 expects that much of this need will be met in the designated growth areas and in other highly accessible locations. The Local Plan acknowledges that meeting the increased housing target of 1,120 per year will be challenging and the emphasis of policies H1 and H2 is to prioritise the delivery of self-contained housing as part of a mix of uses.
- 6.31 In 2018, the Government introduced the Housing Delivery Test as a formal measure of whether development is providing the number of homes required. The NPPF indicates that planning decisions should reflect the outcome of the Housing Delivery Test. Under the provisions of the NPPF, where delivery falls below 95% of the housing required, authorities must prepare an action plan to indicate how delivery will be increased, and where delivery falls below 85%, authorities must add 20% to their five year housing supply – this means they

need to have enough housing sites "ready to build" to meet their requirements for the next six years. In the light of the Camden's 87% delivery in 2019, the Council published an action plan in 2020. Following the borough's 79% delivery in 2021, we will also be required to identify enough "ready to build" housing sites to meet our requirements for the next six years- at least 6,720 homes, based on the annual target of 1,120 in the Local Plan. Officers currently estimate that we have land ready to provide 4,500 to 5,000 homes, equivalent to 4 to 4.5 years' supply. On this basis, paragraph 11 of the NPPF is engaged, which puts a presumption in favour of approving schemes which deliver housing.

- 6.32 Policy IDS1 in the draft SALP attaches an indicative figure for delivery of 13 new homes at the Network Building site, assuming the existing 7 homes are retained. Policy IDS2 identifies a potential capacity of 12 for Tottenham Mews. The proposal for 23 new homes at the Mews is just 2 short (8%) of the total capacity figures for the two sites, but is 9 short (39%) when the loss of the existing market homes is added. The development proposals for Tottenham Mews are close to the upper limits of acceptable massing and density on the site. The proposals would deliver 23 affordable homes, which is a net increase of 16 homes across the two sites, but is less than the SALP projected housing potential across the two individual sites. However, that projection does not factor in the affordability of the new homes, and Housing CPG acknowledges (5.40) that *"the Council might accept an off-site housing contribution that does not meet the initial off-site housing target, but all the housing is provided as affordable housing"*.
- 6.33 Officers consider that the applicant has demonstrated significant commitment to delivering housing as part of the overall two-site approach, by purchasing a donor site and progressing a planning application for affordable housing delivery to a brief which responds well to housing policy on mix, quality and amenity. The developer has also worked closely with officers and Registered Providers on the brief for the affordable housing in order to ensure it meets the needs identified by the Housing Commissioning and Partnerships team to ensure it is deliverable.
- 6.34 Policy G1 supports the multi-site approach where it would contribute to achieving the wider aims of the development plan. The applicant proposes that the two site approach represents the best opportunity to meeting the objectives of the Local Plan by providing high quality employment floorspace and other associated benefits at the Network Building site, while providing new affordable housing and affordable workspace at Tottenham Mews. Furthermore they make it clear that the benefits of the development are dependent on the two site approach: with the Network Building providing commercial floorspace (potentially as a knowledge economy building) and Tottenham Mews providing affordable housing and affordable workspace. In addition to the affordable housing and affordable workspace, the development would also contribute to better quality, safer and more accessible public realm (see section 8 on open

space) and the potential for beneficial Knowledge Economy outcomes (section 19).

6.35 Officers consider that the Housing Delivery Plan should be taken into account when considering how mixed-use developments respond to the policy targets for housing delivery. Furthermore paragraph 11 of the NPPF is engaged, which puts a presumption in favour of approving schemes which deliver housing. The development would deliver fewer homes than the SALP anticipates across the two sites, but the following factors need consideration:

- The applicant has made it clear that viability considerations preclude housing coming forward on the Network Building site as part of a commercial re-development of the site.
- If the current building proposals for Tottenham Mews were brought forward as a standalone housing site the affordable housing requirement would be 1076sqm (46%), which is less than half of the affordable floorspace currently on offer;

6.36 Noting that the IDS1 and FAAP policy presumption for the Network Building site is for commercial-led development, on balance, officers consider that the relative certainty of the delivery of 23 new affordable homes across the two sites brings greater immediate public benefit than the possibility of a greater number of homes being delivered by a different development concept in the future. On this basis, officers consider that the proposals achieve the aims of policy G1 (d) *“supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan”*, and the aims of policies H2 and H3 and is acceptable.

7. DESIGN, CHARACTER & APPEARANCE, IMPACT ON HERITAGE ASSETS

7.1 The outline application documentation sets limits on the height, massing and building lines but reserves detailed design (appearance) and layout for future applications. This chapter assesses the outline design parameters and the impact of the proposals on local heritage assets. The chapter is structured as follows:

- Policy and statutory provisions
- Site: context, opportunities, heritage assets
- Overview of documentation
- Design matters in outline decision notice

Policy & Statutory Provisions

- 7.2 The site is neither listed nor in a conservation area. The majority of the site is located within the protected view from Assessment Point 2B.1 (East of the summit of Parliament Hill) towards the Palace of Westminster in the London View Management Framework Supplementary Planning Guidance 2012 (LVMF SPG). It is not located in any locally identified or protected Conservation Area Views.
- 7.3 The statutory provisions principally relevant to the determination of these applications are sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”).
- 7.4 Section 66 of the Act requires that in considering whether to grant planning permission for development which affects the setting of a listed building the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or Historic interest which it possesses.
- 7.5 Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area. The effect of S.72 provides the statutory basis for a presumption in favour of preserving or enhancing the character and appearance of Conservation Areas. **Considerable importance and weight should be attached to this presumption.** A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations to outweigh the harm. The NPPF provides guidance on the weight that should be accorded to such harm and in what circumstances such harm might be justified.

The National Planning Policy Framework 2019 (NPPF)

- 7.6 Government guidance on how to carry out those duties is found in the National Planning Policy Framework, Feb 2019 (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where conserving heritage in a manner appropriate to their significance is one of the 12 core principles. NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter (paragraph 8c) including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are interdependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
- 7.7 Chapter 16 (Conserving and enhancing the historic environment) sets out how the historic environment should be conserved and enhanced.

- 7.8 Harm to significance should require clear and convincing justification. Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is 'substantial', or 'less than substantial'. If the defined harm is 'substantial', the advice is that it should be refused. If the harm is deemed to be 'less than substantial', the NPPF requires that harm to be weighed against the public benefits of the proposals. If the public benefits identified do not outweigh the harm, it should be refused. The relevant paragraphs are reproduced below:

"193. 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.

194 [in part]. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.....

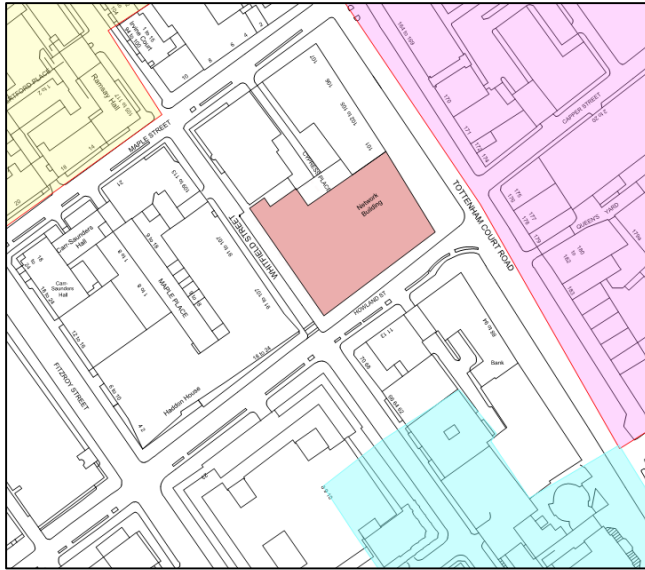
196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use

London View Management Framework SPG (2012)

- 7.9 The LVMF Supplementary Planning Guidance (SPG, Mayor of London, March 2012) includes Visual Management Guidance for Protected Vista 2B.1. It states that *'The viewer's ability to perceive the visual relationship between the Clock Tower, the Central Tower and the Victoria Tower should be maintained or enhanced. Any development proposals that would undermine this relationship should be refused. A Protected Vista, incorporating the full width of the Palace of Westminster, reinforces this requirement' (p50, Para 109)*.
- 7.10 The SPG also includes general policies regarding Protected Vistas. It states that *"where there is a Protected Vista... development that exceeds the threshold height of a Landmark Viewing Corridor should be refused"* (Policy 7.12 F, p15). This policy is incorporated in the London Plan (2021) at Policy HC4 which states *"Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."*

CONTEXT

- 7.11 The urban blocks in this area would have originally comprised relatively low density, small buildings, creating a fine urban grain. However, this part of Fitzrovia has changed significantly since the Second World War and the latter part of the 20th century saw the introduction of larger buildings that support the varied range of commercial educational and medical activities that take place locally. The different land uses in the immediate context of the Network Building reflect a recent change in use which is in line with the evolution of the urban grain. Large commercial, educational and medical buildings have become part of the new Fitzrovia character and established its relationship with the Knowledge Quarter.
- 7.12 The Fitzrovia Area Action Plan characterises the Howland Street character area as *“predominantly developed with post-war steel and concrete buildings. The scale and grain is significantly larger than the rest of Fitzrovia, and building heights around 5-7 storeys.”* In the Fitzroy Square character to the north of the site, residential buildings with commercial units at ground floor are still predominant, reflecting the areas in which the original urban fabric has remained broadly unchanged. Tottenham Court Road remains dominated by retail uses, emphasising its character as major shopping street populated with shops, cafes and restaurants. It is a wide, tree-lined street with mid-rise buildings and has recently benefited from major public realm improvement works as part of the West End Project.
- 7.13 Opposite the Network Building, on the southern side of Howland Street, is 90 Tottenham Court Road, a 6/7 storey building which is accessed via Howland St. On the Corner of Whitfield Street is the Carpenters Arms Pub.
- 7.14 Howland Street is a primary vehicle and cycle route, providing one-way westerly access into Fitzrovia, Marylebone and beyond. Whitfield Street is a tertiary single-lane street with a southbound carriageway to Howland Street and contraflow cycle route. Between Howland Street and Maple Street, this part of Whitfield Street is dominated by service and secondary access points to buildings on both sides of the road, although it also provides the residential entrance to 88 Whitfield Street.



The site is not in a Conservation Area (CA). Bloomsbury CA is to the east on the east side of Tottenham Court Road (shown in pink). Charlotte Street CA incorporates buildings along Whitfield Street to the south (shown in blue). Fitzroy Square CA reaches Maple Street to the north (shown in yellow) in Figure 7.1.

Figure 7.1: Site and Conservation Areas

DESIGNATED HERITAGE ASSETS

7.15 There are a number of listed buildings in the setting of the site, as follows:

- BT Communication Tower (Grade II)
- Heal And Son Limited, including Habitat, 191-199, Tottenham Court Road (Grade II*)
- Glen House, 200-208 Tottenham Court Road (Grade II)
- 2 Maple Street (Grade II)

7.16 The Network Building's prominent corner site means it forms part of the wider setting of the Grade II listed BT Communication Tower which rises from Cleveland Mews, two blocks to the west. Two blocks to the southeast of the site on the opposite side of Tottenham Court Road are the premises of Heal and Son Limited (Grade II*) and Glen House (Grade II). Where the building is seen as part of the wider setting to these listed buildings it makes a neutral contribution.. No.2 Maple Street (Grade II) is closer to the site but the proposals are not part of the Maple Street setting. 88 Whitfield Street has only a single street facing elevation and does not contribute to the wider setting of nearby listed buildings.

Conservation areas

7.17 The building forms part of the setting of the western boundary of Bloomsbury Conservation Area. The site has no visual impact on the formal squares which form the principal significance of the conservation area and the Tottenham Court Road elevation of the building makes a neutral contribution to the setting of the Bloomsbury Conservation Area.

7.18 Charlotte Street Conservation Area is located to the south and views of the current building from within the CA are limited to locations just within the

northern boundary of the CA. The building has a largely neutral impact in the views from Whitfield Street.

- 7.19 The Fitzroy Square Conservation Area is northwest of the site and the site is only visible from within the CA in a view from the corner of Whitfield Street and Maple Street. The impact of the site on the setting of the conservation area is therefore very limited.

LVMF

- 7.20 The majority of the site is located within the protected view from LVMF Assessment Point 2B.1 (Parliament Hill) towards the Palace of Westminster. The base of the viewing corridor threshold is 58.95m AOD.

Context: opportunities

- 7.21 The existing building was designed and built for the Coal Industry Nominees Ltd. by architects Downton & Hurst in 1955 to replace the southern half of a bomb-damaged urban block. The building is not considered to be of any special architectural or historic interest. While its overall scale is unobtrusive and similar to the surrounding buildings, the building finishes now appear dated and worn and its tired appearance detracts from the local townscape.
- 7.22 The site is bisected by Cypress Place which is a public right of way and as an access road for servicing the Network Building and the Qube. Cypress Place has an uninviting back-of-house character and the vehicle access point mid-block on Howland Street interrupts the busy pedestrian pavement. The interface between the building and the street environment is harmed by the basement ventilation plinth along Howland Street and Whitfield Street, which also restricts the pavement width.
- 7.23 The re-development of the Network Building offers the opportunity to:
- Enhance this prominent corner of Tottenham Court Road through the introduction of a high quality piece of architecture;
 - Make a positive contribution to the setting of the nearby conservation areas and listed buildings;
 - Provide an environmentally responsible building that is flexible and adaptable ensuring its long-term sustainability;
 - Improve the relationship of the building with the street through the introduction of active frontages along Howland Street and Whitfield Street;
 - Remove the basement vents and create meaningful improvements to the character and identity of the streetscape on all sides of the building;
 - Improve the quality of the public realm around the building including the widening of pavements, connection of busy foot-ways, planting of new trees and ecologically beneficial landscaping.

Revisions

7.24 The following revisions were received during the course of the assessment:

- The ground floor and first floor facade have been set back to improve the pavement width on Howland Street, Whitfield Street and Tottenham Court Road;
- Design Guidelines revised;
- The roof storey has been set back to a minimum distance of 3.6m from the Howland Street building line to reduce the visibility of the top floor when viewed from street level;
- The plant screen has been set back at the northern end of Whitfield Street to reduce visibility from the street;
- Components of maximum building heights clarified in parameter plans and development specification;
- Improvements to extent of SUDS (green roof / blue roof);
- Improvements to landscape arrangements at street level on Whitfield Street.

Demolition

7.25 The outline application seeks to demolish the Network Building, 78 Whitfield Street and 88 Whitfield Street. The existing buildings are not considered to be of any special architectural or historic interest and therefore there are no design objections to demolishing the building. The environmental impact of demolition is considered separately in section 12 (sustainability) below.

Building: massing, height and grain

7.26 The parameter plans set out the maximum width, height and depth of the building. The outline documents show that the building massing would be composed of three volumes: base, middle and top. It would occupy a similar footprint to the existing buildings, although it would incorporate Cypress Place and make some adjustments to the building lines. The base would comprise ground and 1st floors; the middle element would rise from 2nd floor to parapet and the top would be a setback roof level.

7.27 At the base, the building line would curve from Tottenham Court Road around the corner to a concave form on Howland Street, providing wider pavements following the removal of the basement plinth. Along Whitfield Street the new building line would also support wider pavement space and the curved corners at street level would ease pedestrian movement around the building. The concave entrance on Howland Street would distinguish the lower floors from the main volume of the building above.

- 7.28 The middle section (upper floors) would project outwards to align with the ownership line of the site along Howland Street. The upper floors would therefore extend c1.7m further into Howland Street than the existing building, which would be a noticeable and significant increase in overall massing. From street level the additional mass would be perceived as greater enclosure of Howland Street at its east end where it meets Tottenham Court Road, although the pavement would be widened and the separation distance from the facing building on the other side of Howland Street (88-94 Tottenham Court) would be broadly comparable with other separation distances between large scale commercial buildings further west along the street. The additional enclosure would have implications for local views and setting of the Grade-II* listed BT Tower, which are discussed below. The building line (from ground to parapet) along Tottenham Court Road would remain as existing.
- 7.29 Along Whitfield Street the upper floors also come forward of the base to match the top floor building line of the Qube, providing an overhang of up to 0.9m close to the join with the Qube. This would also add to the sense of enclosure along Whitfield Street, however the revisions to the design of the base of the building along the street and public realm improvements next to the building will help to mitigate the impact.
- 7.30 The roof level would comprise office space and plant equipment, inset from the lower elevations and reading as a separate roof form. This would reduce the perceived height of the building as experienced at street level. On Howland Street, the roof level accommodation has been set back further through discussions with officers to reduce the perception of mass at street level, and now ranges from 3.6m to 4.5m behind the parapet on Howland Street along its length, due to its gentle concave curved form. This will soften the building and make the upper floor appear more recessive in local views. The setback creates a generous south-facing terrace, providing the building users with access to outdoor amenity.
- 7.31 In the centre of the urban block the building would expand to incorporate an area currently used for street level parking, servicing and a ramp to the basement carpark (which would be removed). The centre of the urban block would remain open to the sky.
- 7.32 The Development Specification and the Parameter Plans limit the height of the roof parapet to 59.01m AOD, which allows for a maximum height of 31.15m to the parapet of the roof. In townscape terms the principle of a building of this height and size is acceptable. It would be slightly taller than it's near neighbours, but sits comfortably within the established mid-rise townscape and would accommodate 8/9 commercial storeys. This scale is present along Tottenham Court Road and in the surrounding streets. Throughout Fitzrovia, a general trend of large footprint mid-rise commercial buildings can be observed and as such a building of this scale is considered appropriate here. The setback roof element would help to soften the impact of the additional height.

7.33 Draft SALP policy IDS1 sets out a series of urban design-related expectations, including :

- Use entrances and windows to provide activity and visual interest on the Whitfield Street frontage;
- Respond to the smaller plot-sizes and building widths found in the wider Fitzrovia area;
- Remove the low plinth on the Whitfield Street and Howland Street facades;
- Make the eastern end of Howland Street more pleasant for pedestrians.

7.34 The supporting text (10.5-6) sets out the background to these expectations, highlighting that *“the blocks immediately to the east and south of the site are dominated by large institutional and commercial buildings. Many of the facades are featureless and provide no activity or visual interest”*. The aim is to *“introduce activity and visual interest to Whitfield Street frontage, and seek to respond to the rhythm created by the smaller plot sizes and building-widths found in the wider area”*.

7.35 The existing building is composed of a number of elements which break down its visual form and provide variety along the street, although a number of these components such as the basement plinth and the lightwells/Cypress Place entrance on Howland Street also serve as impediments to ease of movement and provide limited wider benefits to the streetscape. The development seeks to rationalise the whole plot into a more homogenous single form, but with active frontages and entrances on all sides and supported by high quality architecture. While the scale and grain of the building would not provide smaller plot sizes or building widths, officers consider that the building would be an improvement on how the other large commercial buildings in the area interact with the public realm, with the lower floors supporting variety, activity and quality of interface with the street (see *land uses, entrances and servicing* below). The building would therefore accord with policy IDS1.

Massing and height: impact on LVMF

7.36 The protected LVMF viewing corridor threshold is 58.95m AOD across the site and therefore the maximum parapet height of 59.01m proposed by the Development Specification encroaches 0.06m (60mm) into the viewing corridor. The parameter plans also propose that further breaches would occur as follows:

- Three lift overruns covering an area of 74sqm (3.5% of the building footprint) to 60.14m AOD (1.19m above the threshold);
- Glazed balustrade/handrail of the roof level terrace to 59.96m (1.01m above the threshold); and
- Angled photovoltaic panels (0.62m above the threshold).

7.37 The Mayor’s LVMF SPG states that *“development that exceeds the threshold height of a Landmark Viewing Corridor should be refused”* (Policy 7.12 F, p15).

Historic England (HE) commented that the encroachment conflicts with London Plan policy which protects the viewing corridor, although they also comment that they “*consider it unlikely that there would be an adverse impact on the Outstanding Universal Value of the World Heritage Site. The visual relationship between the towers of the palace would clearly be maintained and the proposed development may not be perceptible in reality*”. HE have requested for clarification of the impact through further visual studies and for exploration of opportunities to reduce the maximum height of the proposed outline parameters to avoid the conflict. The GLA echo HE’s request for clarification and further study.

7.38 The conflict identified by the consultees could be remedied by lowering the building by 60mm so that it sits entirely below the threshold. However, officers consider that the encroachment of the roof parapet by 60mm (0.19% of the proposed height of 31.15m) is not material, would not be perceived from the viewing point on Parliament Hill, and therefore lowering the building height by 60mm is not necessary. Officers also consider that each individual breach (a-c above) would not be readily discernible and is very unlikely to have a material impact on “*the viewer’s ability to perceive the visual relationship between the Clock Tower, the Central Tower and the Victoria Tower*” (LVMF SPG para 102) and the development proposals would not undermine this relationship. Cumulatively, the impact of a number of encroachments has greater potential to cause foreground clutter. Possible remedies include:

- lowering the building by c.1m to bring the offending items below the threshold; or
- removing the breaches by prohibiting the use of the roof as a terrace, finding alternative means of generating on-site renewable energy and removing the lift to the top floor.

7.39 Officers acknowledge the benefits of each of the items which cause a breach. None of these remedies is straight forward and each would have an impact on the quality of the commercial space or the performance of the building, although the area of the rooftop terrace has been reduced by 20% as part of the design revisions. The applicant has also submitted further detail in a hi-resolution image to demonstrate that the cumulative impact would not be significant. Officers therefore consider that the minor incursions are acceptable, as they would not undermine the viewer’s ability to perceive the visual relationship between the three towers of the Palace. However in order to minimise the risk of the building contributing visual clutter in the protected view, it is considered reasonable and necessary to ensure that no structures, either temporary/moveable or permanent, are added within the viewing corridor. Condition 12 secures this requirement. It is noted that a small portion of the roof along Whitfield Street is outside of the viewing corridor and flues for the life-science building would be located in that zone.

Massing and height: impact on setting of Listed Buildings

- 7.40 Local Plan Policy D2 states that the council will resist development that would cause harm to significance of a listed building through an effect on its setting. Annex 2 of the NPPF defines the setting of a heritage asset as '*the surroundings in which a heritage asset is experienced*'.
- 7.41 The Grade-II listed BT Tower, located in Cleveland Mews which is not in a conservation area, is a highly visible landmark in long views across London, but it is also prominent in some local views. The Tower is noted in the Fitzroy Square and Charlotte Street CA statements as a local landmark which is visible from various points within the two CAs. The development would *not* obstruct the views identified in the statements.
- 7.42 The Tower is not mentioned in the Bloomsbury CA Statement, but the development would be prominent in the foreground of views from within the CA along the east side of Tottenham Court Road and along Capper Street. The GLA have identified that the increase in massing and height would obscure the visibility of the slender lower section of the BT Tower, causing less than substantial harm to the setting of the heritage asset, as demonstrated in Verified View 02, looking west from along Capper Street.
- 7.43 The applicant has submitted further illustrations of the impact of the development on local views of the BT Tower in order to demonstrate the extent of impact on the setting of the asset. The illustrations demonstrate that the views are kinetic and relatively small changes in the viewer's position may obscure or reveal views of the Tower. The southern pavement of Capper Street starting from Huntley Street provides a westerly view of the Tower along a stretch of no more than 100m and therefore while the Tower is prominent from Capper Street it is a very *local* view. Views of the lower segments of the Tower become screened by the existing building as the viewer approaches Tottenham Court Road. This kinetic experience would be retained by the proposed building, although the additional height of the development would shorten the length along which the view would be experienced.
- 7.44 From the east side of Tottenham Court Road, much of the Tower's full height, including its lower segments and an indication of where it reaches street level, is clearly exposed in winter views west along Howland Street. The new building line along Howland Street and the additional height would combine to reduce the locations from which the full extent of the Tower would be appreciated. The Tower is made up of different segments and a key part of its protected significance lies in its slender and towering presence. It is noted that the Tower would not be entirely obscured from the affected viewing points with the upper drum still apparent in even the most oblique view and so its role as a landmark would not be significantly diminished. However, the development would reduce the vantage points from which the composition and elegance of the Tower would be observed, and this would cause less than substantial harm to the setting of the designated heritage asset. The impact on the setting would not be lessened

by an improved architectural approach, only by a significant reduction of massing and height.

Massing and height: conclusions

7.45 The massing and height of the proposed building, with boundary limits prescribed by the parameter plans and development specification, would sit comfortably within the wider context of large-scale commercial buildings in this part of Fitzrovia. The impact of the development on the protected view of the LVMF would be marginal and unlikely to be noticeable. Condition 12 would protect it from future erosion. It is therefore not considered any harm would result cumulatively or otherwise to the appreciation of the strategic view. The impact on the setting of the BT Tower would be limited to autumn/winter views from a small area of the public realm, and would constitute the lower end of less than substantial harm. In applying Section 66 of the Listed Buildings Act the harm must be weighed against the public benefits of the development, whilst giving **considerable importance and weight to the presumption against causing harm**. This is considered further in the overall conclusion (section 25). The limitations on height and building lines (boundaries) at all levels would be secured by condition 2. The development would have no impact on the setting of the other listed buildings identified above.

Land uses, entrances and servicing

7.46 The street level experience of the existing building presents few entrances, lengths of blank frontages, a vehicle access point to Cypress Place and a basement plinth. Cumulatively these provide a poor quality interface between activities inside the building and passers-by. Officers welcome the development's aims to improve the extent of active frontages and the quality of the public realm experience around the site.

7.47 The design guideline ('relationship between the street and building') sets the tone of the ambition with *"the new architecture will completely transform the relationship between the building and the street (and the consequent pedestrian experience) when compared with the existing site condition, improving not only the pedestrian circulation around the building, but also creating new dialogues between the public realm and the activity of the building's internal spaces"*. A key element of the developer's aspiration is the landscaping works outside of the site ownership, adjacent to the building. These works are discussed in detail in section 8 (open space, landscaping).

7.48 The predominant use of the building would be commercial offices or life sciences, within use Class E, but policy TC1 (see section 19) expects a prominent retail component in the primary shopping frontage along Tottenham Court Road and around into Howland Street. The Parameter Plans and the Design Guideline identify the retail frontage. Access to the retail units on Tottenham Court Road are defined by clear and visible entrances to Tottenham Court Road, which will support the high street frontage. Condition 8 would

secure shop front displays to all retail floorspace in order to ensure that the frontages are active and engage with the street.

- 7.49 The main office lobby is accessed from mid-block on Howland Street, improving the identity of the building on this stretch the street which currently lacks definition. The closure of Cypress Place enables the reconnection of the footway on Howland Street, which would improve the pedestrian environment here. A secondary entrance at the south end of the Whitfield Street elevation provides the opportunity to subdivide the ground floor/basement office space and create a self-contained office, adding positive engagement with the street. The majority of the frontage along Whitfield Street would be commercial, although the northern half of the frontage may serve back-of-house functions to support the building configuration for life-sciences. The building will integrate c.20m seating into the façade design as a prominent street-level detail on the corner of Howland and Whitfield Streets, in order to promote engagement between the public and the building.
- 7.50 The parameter plans are not prescriptive on the internal sizes or typologies of the commercial occupiers, but officers' strong preference is for as much street level frontage as possible to have the potential to be active and engaging. However, it is accepted that some commercial uses may have greater demand for back of house facilities, and in any event it is not considered reasonable or enforceable to regulate or prescribe the nature of activation along office frontages where the occupant is not known. Overall it is considered that the new frontages along Tottenham Court Road and Howland Street would be a significant improvement on the existing building. The removal of the basement plinth and the changes along Whitfield Street would also provide greater opportunity for better interaction between activities in the building and life in the street.
- 7.51 Servicing of all uses in the building would be from the yard within Cypress Place, accessed via Maple Street which is welcomed as it would reduce the demands on the public street frontage. Servicing is discussed in more detail in section 11.

Detailed Design

- 7.52 The design guidelines set out a series of principles to inform the detailed design concept and create '*an expressive building with a clear character and identity*', such as using depth and relief in surfaces to create variation across the facades and encourage dynamic reading of light/shadow, using flowing forms, tactile surfaces and natural materials and using expressive detailing to allow enjoyment of the building close up. The indicative materials palette includes pigmented recon-stone and profiled pre-cast concrete and internal timber finishes.
- 7.53 The proposed facade composition of three volumes (base, middle, top) draws influence from the department store typology seen in Heals and Habitat and allows variation in architectural detailing between elements. The guidelines

provide a detailed overview of the grid structure of the central volume, with illustrations of the articulation and asymmetric profile of the piers and projecting horizontal spandrels. The pared back approach to materiality across the building will give prominence to the shaping and composition of the panels and allow the changing texture provided by the light to act as another dimension of the material palette.

- 7.54 The top level volume would be set back from the street on all three sides and during the assessment the Howland Street setback was increased in response to officers concerns about the impact of the massing of the top of the building in the context of smaller properties along Whitfield Street. The increased setback is welcomed and would be ensured as part of the parameter plans. The office accommodation on the top floor would be finished with a glazed metal framed façade so that it would be distinct from the more solid appearance of the main volume of the building. The setback plant screen in the northern half of the roof level would be wrapped in a 'tray-profiled' metal panel plant screen.
- 7.55 The illustrative material and design guidelines show that the parameter plans allow for a substantial retail base and shopfront onto Tottenham Court Road, with a 3.7m zone, framed by precast masonry vertical panels which help to ground the building and bring a human scale to the ground floor.
- 7.56 The final design will rely on the quality and subtlety of materials and detailing. The proposed material palette responds contextually to the area and confirmation of the choices would accompany applications for reserved matters. Reserved Matter decisions notices would use conditions as necessary to secure final details of the shopfront design, building materials and design detailing, to ensure the building is designed to the highest quality with a durable finish that weathers gracefully.

Sustainability & design

- 7.57 The design guidelines include sustainability principles which will inform the detailed design of the building, including how the building facade would incorporate solar shading. The principles also include a circular economy approach to optimising material efficiency and waste reduction, adaptability, durability and design for disassembly at the end of the building's life, whilst balancing user comfort, climate resilience and future adaptability and operational energy performance of the building. See section 19 for further details.

Response to Design Review Panel

- 7.58 The proposals were reviewed by the Camden Design Review Panel prior to submission (See section 3 for details). The panel were confident that the developer could deliver a building of high architectural quality. The following comments summarise the design response to the points raised by the Panel:

- Improvements have been made to the ground and first floor façade, setting them back and improve the pavement width on the surrounding streets. The double height base on Whitfield Street has been reduced to single storey as it joins the Qube, improving the response of the building to the secondary street. The developer has also increased their financial contribution to public realm improvements in the immediate area.
- The scale of the ground floor expression has been reduced on Whitfield Street to better reflect and respond to the scale of the street. Public benches have been incorporated into the façade of the building to provide activity and further public realm improvements to Whitfield Street.
- Tree species other than London Planes are proposed to be introduced along Howland Street based on discussions with Camden’s arboricultural officers in order to increase biodiversity.
- Rain gardens have been introduced along Howland Street and Whitfield Street, and a green roof is proposed in order to increase the urban greening factor
- The panel raised concerns about the upper building line along Howland Street. It will change the character of this part of the street, but is not an unusual condition further west along Howland Street. The increased pavement width, new entrances, landscape improvements and high quality architecture will have a positive impact on the street and officers consider that the increased sense of enclosure is acceptable in this context.

Other design matters

7.59 The Design & Access Statement refers to external lighting in three zones across the building: ground floor entrance lighting and perimeter up-lighting; office floor CLT soffit illumination and top floor/terrace down-lights. Design CPG notes (4.60) that while adequate lighting is required, the intensity of lighting should be appropriate to its function and care should be taken not to over-light which can lead to unnecessary light pollution, energy consumption and can become a nuisance to neighbouring residential properties. The new scale of the building will ensure it is highly prominent in this location, and officers consider that the lighting strategy should be low-key and not seek to draw additional attention to its presence. Condition 11 secures details of a lighting strategy.

Design Conclusion:

7.60 Listed buildings and conservation areas are subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”). With regard to applications for planning permission affecting the setting of statutory listed buildings, Section 66 of the Act states that “*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may*

be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- 7.61 Section 72 of the Listed Buildings Act requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area.
- 7.62 The site is not in a conservation area although it would be prominently visible from within the boundaries of Bloomsbury, Charlotte Street and Fitzroy Square Conservation Areas. The massing and scale of the building responds to the local context including the character of the CAs, and subject to acceptable appearance (design) being secured as part of the reserved matters the development would cause no harm to the setting of the nearby Conservation Areas.
- 7.63 The development would improve the architectural quality of this prominent corner in Central London and to engage more successfully with the streets on all three sides of the building. The scale and massing of the building is acceptable in townscape terms and accords with the established mid-rise Fitzrovia character. The proposals show generosity to the public realm and would help to activate Howland Street and enhance this part of the town centre. The Design Guidelines establish a baseline of principles and design expectations for the reserved matters applications. They provide an overview of the composition and detailing which are well considered. The indicative material and design guidelines show care and attention to the composition of the façade, choice of material palette and integration of angled elements, textures and finishes would result in a building that interprets materials and details characteristic of exemplar buildings in the area, and would sit well within the context. Overall the application control documents demonstrate that the outline permission will be capable of supporting a high quality building which demonstrates a good example of how to positively plan for growth in an established town centre. Condition 6 requires applications for reserved matters to be accompanied by a design statement which sets out how the appearance and layout accord with the parameter plans and the design guidelines. A head of term ‘Retention of Architect’ is included in the s106 legal agreement which requires the developer to retain an architect of appropriate skill and experience to ensure that the development is delivered to a suitably high standard and finish.
- 7.64 As set out above, the additional massing and height of the proposals would obscure the views of the Grade-II listed BT Tower from a limited area of public pavement to the east along Tottenham Court Road. This would cause less than substantial harm to the setting of the designated heritage asset. Any significant change to the massing of the existing building would result in some loss of view of the Tower and therefore redevelopment of the site would be unlikely to be

viable without some impact on the setting. The application of section 66 of the Listed Building Act imposes a duty to treat harm to a designated heritage asset as a consideration to which the decision-maker must give 'considerable importance and weight' when carrying out the balancing exercise, and that it is not open to the decision-maker merely to give the harm such weight as he thinks fit, in the exercise of his planning judgment. The overall balance of harm against public benefits is presented in section 25 (Conclusions and Recommendations).

8. Open space, Landscaping, Trees, Nature Conservation & Biodiversity

Loss of public realm

- 8.1 The existing building occupies most of the site with the exception of Cypress Place, which is adopted public highway and runs north-south through the middle of the site. Cypress Place provides access to the car-parking in the existing basement and servicing for the existing building and the offices in the adjoining Qube building. These back-of-house functions are reflected in its unattractive and unwelcoming character. The proposals would close Cypress Place at the south end which would halt the public through-route and effectively convert Cypress Place from a publicly accessible route and servicing space to a private service yard. The MET police have welcomed the proposals to close the route, due to anti-social behaviour and community safety issues.
- 8.2 Due to its character and use, Cypress Place is more accurately described as public realm rather than public open space and therefore its closure is not as significant as a loss of public open space when assessed against policy A2 (Open Space). However, officers consider that the policy emphasis is such that there should still be no net loss of area of public realm. Cypress Place also serves as a public through route and a right-of-way, which contributes to the permeability of the local streets. The closure of the south end of Cypress Place would convert this stretch of public highway into a private service yard and remove the possibility of public movement. The FAAP expresses a presumption for its retention.
- 8.3 The closure would allow significant improvement of the public realm along the Howland Street frontage following the removal of the vehicle access point. Local permeability would not be significantly hindered or harmed by removing the north/south route, because the narrow dimensions of the urban block mean that Whitfield Street and Tottenham Court Road are close at hand and attractive and well-used alternatives. Therefore, officers are supportive of the principle of its closure, subject to suitable *replacement* public realm to ensure no net loss.
- 8.4 New on-site public realm would be the ideal replacement and policy preference, however there is no capacity on site and no evident opportunities elsewhere in the immediate area to convert private land to public realm. Officers have therefore focused on finding opportunities for improving existing public realm, largely through re-purposing vehicle space for wider and more varied use by pedestrians and cyclists. The application documents illustrate enhancements

to the streets adjacent to the site, which is consistent with policy in the FAAP and IDS1. The developer also places significant emphasis on the benefits which accrue from their illustration of wider pavements with seating, rain gardens and new street furniture on Whitfield Street and Howland Street. Officers are supportive of the principles illustrated in the plans, which would provide a significant improvement on the local streetscape and greater contribution to public life than Cypress Place currently allows.

- 8.5 The closure of Cypress Place is a key enabler of the proposed development, providing a prominent and accessible front for the commercial entrance and facilitating an efficient and commercially attractive internal layout at ground floor. While just 195sqm of Cypress Place would be *built on* by the proposals, the net loss of highway available for public use would be c.426sqm, which is considered to be the appropriate quantum to form the basis for replacement measures.
- 8.6 The illustrated pavement build-outs along Whitfield Street and Howland Street would re-purpose 190sqm of existing roadway along Whitfield Street, 75sqm along Howland Street and c.80sqm recovered from the removal of the basement plinth and lightwell, giving a total of 345sqm, which would still result in a net loss of space. Therefore it is considered that these measures alone are not sufficient to justify the closure of Cypress Place and so various further options for improvements in the local area have been explored. It is considered that improvements to Tottenham Mews to create a pedestrian-focussed environment would serve various public purposes, including:
- Supporting the quality of amenity and environment for the increasing residential population of the Mews; and
 - Improve the legibility and desirability of the future link between the Mews and Bedford Passage.
- 8.7 The costs of works to install York Stone paving throughout the Mews, a raised table to introduce traffic calming at the entrance to the Mews, planters and improved street lighting has been costed at c.**£262,000**. The cost of implementing the illustrated works to Whitfield Street and Howland Street, including new street trees, widened pavements, a raised crossing and up to 185sqm of SUDs/soft landscaping, alongside the cost of 20 years of green space maintenance of the soft landscaping and litter picking of the SUDs, has been estimated at **£515,457**. The sum of these two figures (**£777,457**) would be secured as a s106 head of term 'Public Realm Replacement'.

New Public Open Space

- 8.8 FAAP policy for the site identifies new Open Space among the priorities for delivery as part of re-development, however the proposed development would cover the full extent of the site and therefore no new public open space is provided within the redline of the site. Local Plan policy A2 requires new

development to respond to the demands that they place on public open space. Where new open space is not provided on site the contribution takes the form of a payment in lieu, secured by s106 head of term 'Open Space contribution'. Public open space CPG Jan 2021 identifies a requirement of 0.74sqm / worker, based on a projected uplift in on-site employees. The s106 wording will secure the contribution for the agreed uplift in occupancy. By way of illustration:

- the planning statement predicts a potential uplift in FTE jobs on site of 595 for the employees of the denser (office) scheme, which gives an equivalent open space requirement of 440sqm. CPG formula therefore identifies a maximum financial contribution of $440 \times £270 = £118,800$;
- The life-science building would have a lower level of employee occupation estimated at 565 (uplift of 135 FTE) due to the extent of lab space and the size of workstation areas, with a consequent contribution of £26,973.

Landscaping and biodiversity

- 8.9 The submitted biodiversity report concluded that the site has no habitats present but has the potential to support widespread breeding birds. Therefore condition 13 will ensure demolition of the building takes place outside of the nesting bird season of March to August.
- 8.10 The proposed building would occupy the full extent of the site, with new hard landscaping provided to widen the footpath between the inset building line at ground floor and the surrounding public highway. The full site coverage means that there is little scope to provide soft landscaping at street level within the site.
- 8.11 The Outline Sustainability statement uses the Mayor's Urban Greening Factor (UGF) to evaluate and quantify the levels of greening in the development. Following officer advice, the proposals were revised during the assessment to include a greater area of living roof and greater biodiversity potential from deeper substrates. The proposals are now for a minimum of 581sqm of green roof, comprising at least 370sqm of intensive (150-300mm of growing medium). Condition 16 would secure these minima, alongside implementation of the recommendations of the ecology report which identifies that the living roofs should :
- Have a specification which is be drawn up by a company with a proven track record in delivering these features in London;
 - Any biodiverse green roof should support at least 25 plant species of value to wildlife;
 - Combining a biodiverse roof with PV panels (biosolar roof) would provide benefits; and
 - The green roof should follow UK standards (GRO, 2014) and include additional habitat features such as deadwood and varying substrate depths,

habitat bricks, temporary pools and deadwood/log piles. This will provide good habitat for a range of insects and birds including black redstart.

8.12 The target UGF score for the site is 0.3. Condition 15 (landscaping & biodiversity) secures details of how the final building design would achieve the UGF target and incorporate biodiversity measures which respond to the ecology report recommendations of:

- Wildlife planting integral to the soft landscaping to include native species and/or species of recognised wildlife value
- Use of good horticultural practice including use of peat-free composts, mulches and soil conditioners
- A prairie style of border planting for areas of planting beds to enhance the site for birds and bats
- Installation of bird boxes for declining species such as house sparrow and starling;
- Use of bespoke invertebrate habitats.

8.13 Condition 16 would secure the minimum area, design and specification/maintenance details of the green roof, in accordance with the recommendations of the ecology report.

Trees

8.14 There are no trees on site, however four Category A London Planes (T3-T6) are adjacent to the site on Tottenham Court Road and a Field Maple (T2) and Ornamental Pear (T1) are located next to the building on Whitfield Street and Howland Street respectively. An Arboricultural Impact Assessment (AIA) was submitted during the assessment to address impact on the existing trees.

8.15 The London Planes make a significant contribution to the character and appearance of the area and a high level of amenity to the public and would be retained with their western crowns reduced to establish a suitable separation during demolition and construction works. Maintenance and care of the trees is the responsibility of the Council's Green Space team, and the Council's contractors would carry out any pruning works. In order to facilitate the proposed development, T1 and T2 are to be removed and replaced. The illustrative proposals from the applicant indicate 13 replacement trees, of appropriate maturity, next to the building. No objection is raised to their removal and replacement by varieties chosen for diversity, resilience and appropriateness for location. A financial contribution towards replacement tree planting would be secured as part of the 'public realm replacement' head of term in the s106 legal agreement. Condition 14 requires tree protection measures to be installed before any works commence on site, in accordance with the AIA. Subject to these measures the proposals will preserve the health and value of the trees in the immediate vicinity of the site, as required by policies D1, A2 and A3 of the Camden Local Plan 2017.

9. Basement

- 9.1 Policy A5 (basements) requires developers to demonstrate that schemes maintain the structural stability of the building and neighbouring properties, avoid adversely affecting drainage and runoff or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area. The basement policy does not distinguish between the requirements for outline planning applications and full planning applications.
- 9.2 The existing basement would be expanded in footprint to cover the full extent of the plot ownership with a maximum basement finished floor level of 6.7m below ground level, as set by the design guidelines. This is a large comprehensively planned site and therefore policy A5 allows for a basement of the scale and depth proposed. The basement would contain floorspace which is ancillary to the primary end use of the building, including plant and cycle storage facilities.
- 9.3 The submitted Structural Engineering report did not include sufficient assessment and evidence to confirm that the requirements of policy A5 would be met within the defined parameters of the outline application. Therefore the applicant has submitted detailed Basement Impact Assessment (BIA) for each of the two Reserved Matters applications. The plan area of the proposed basement would be approximately the same for the two schemes, with a key difference being the building load which derives from the superstructure. A lightweight CLT/steel approach is proposed for the office scheme and concrete flat slab for the life-science approach. The basement slab for the life-science building would be twice the thickness of the office slab.
- 9.4 LUL/TfL and Thames Water have expressed an interest in the basement and piling works. The interfaces between the basement works and third party infrastructure providers would be addressed as follows:
- A head of term would be added to the s106 securing the need for 'Approval In Principle' (AIP) agreements with the associated with the Council's Highways department.
 - Condition 35 requires a Piling Method Statement to be agreed with Thames Water in advance of basement works
 - Condition 17 requires agreement to be reached with London Underground Ltds (LUL) on basement related works as they may impact on LUL's infrastructure.
- 9.5 A ground movement assessment (GMA) is presented for each of the two building designs, supported by evidence justifying the projected results. Campbell Reith (CR) conclude that the two proposed basement will meet the requirements of policy and CPG. The conclusions of the BIAs demonstrate that two distinctly different building superstructures with their diverse loading conditions and basement designs, can be achieved on site within the

requirements of policy A5 and the parameter plans. It is therefore considered that the outline basement proposals are acceptable.

- 9.6 Condition 18 requires the engagement of a suitably qualified engineer for the final basement design and the duration of the construction works. Condition 4 requires Reserved Matters applications to submit a detailed Basement Impact Assessment to demonstrate compliance with policy A5 and the basement parameters in the parameter plans. Subject to these conditions and the Heads of Term for AIP, the basement proposals accord with the requirements of policy A5 and Camden Planning Guidance and are acceptable

10. AMENITY OF NEIGHBOURS

- 10.1 Policy A5 expects development to take account of the impact on local amenity. The majority of the closest neighbouring properties are office or commercial buildings.

Daylight and sunlight

- 10.2 A 'Daylight and Sunlight' report has been submitted which provides an assessment of the potential impact of the development on sunlight and daylight and overshadowing, which is based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide (2011)'. The report assesses the impact on neighbouring residential properties. Table 13.1 shows that the impact of the proposals on daylight to the nearest residential windows is not significant and raises no concerns.

Address	Impact on daylight /sunlight	Comment
68-70 Whitfield Street (Carpenters Arms)	No noticeable reduction to ground or 1 st floor pub windows.	Premises license shows 2 nd floor windows serve pub toilets and are therefore not sensitive to daylight reduction.
170, 177-178, Tottenham Court Road	No noticeable reduction	
109-113 Whitfield St	No noticeable reduction	

Table 10.1 : Impact on daylight in nearest residential properties

Light pollution, outlook and privacy

- 10.3 The nearest residential properties are 30m away on the opposite side of Tottenham Court Road and 25m diagonally opposite at 109-133 Whitfield Street (Montagu House). Therefore there is no significant potential for the development to cause light nuisance to the nearest sensitive residential

windows, nor for the additional bulk of the building to have an impact on outlook from habitable windows. The areas of the roof reserved for roof terraces (level 7 facing Howland Street) and level 8 on the rooftop of the office pavilion, would be sufficiently far from the nearest habitable windows to ensure there would be no significant harm to the privacy of nearby homes. However they are of a size which would allow for significant gatherings of people which give rise to concerns about their hours of use. Condition 17 therefore apply controls to the hours of use of the terraces and condition 21 adds a restriction on the playing of music, so as to preserve local residential amenity, consistent with other developments of this type in the area, in accordance with policies G1, A1, A4 and TC2.

Noise and disturbance - plant

- 10.4 The building will require basement and rooftop plant equipment. The submitted Plant Noise Assessment documents the background noise survey and sets plant noise emission criteria to achieve at the nearest residential windows, in order for the acoustic impact to achieve Camden's noise requirement of 10dB below background levels. The report identifies the nearest residential at the Carpenters Arms which is 20m from the site, but does not mention the flats in 109-113 Whitfield Street, which are c.5m further away from the proposed rooftop plant areas. Despite this oversight, as they are roughly equidistant from the rooftop plant, the acoustic requirements are the same for both sensitive elevations and the recommendations of the Assessment remain valid.
- 10.5 Environmental Health officers have reviewed the details and accept the findings of the noise report, which ensures that the Council's noise thresholds (Local Plan appendix 3) are met. Condition 20 requires the plant equipment to achieve Camden's noise requirements and requires confirmation prior to operation that the noise standards would be met by all plant equipment operating cumulatively. Condition 29 limits the hours of use and noise limits of the rooftop emergency generators, and condition 22 which requires anti-vibration measures to be fitted to plant equipment.
- 10.6 In accordance with policies A1 and A4, in order to ensure that any hot food cooking in the ground floor retail units does not cause harm to local amenity from an odour or noise perspective, condition 23 requires details of how cooking fumes would be suitably odour controlled and extracted/ducted to a high level away from the street. This would avoid the need for unsightly low level extract/intake louvres at street level above the retail shopfronts.
- 10.7 Subject to these conditions the noise impact of the proposals is acceptable and the proposals accord with policy A1 (amenity) and A4 (noise and vibration).

11. TRANSPORT & HIGHWAYS

- 11.1 The site is bordered by adopted highway to the east (Tottenham Court Road), west (Whitfield Street) and south (Howland Street). In addition, Cypress Place,

which is adopted highway, runs through the centre of the site (see Figure 11.1). The site is very well located for ease of access to public transport, with the highest score on the scale of Public Transport Access Level (PTAL). Godge Street and Warren Street underground stations are within 320m and the nearby area is served by 5 bus routes.

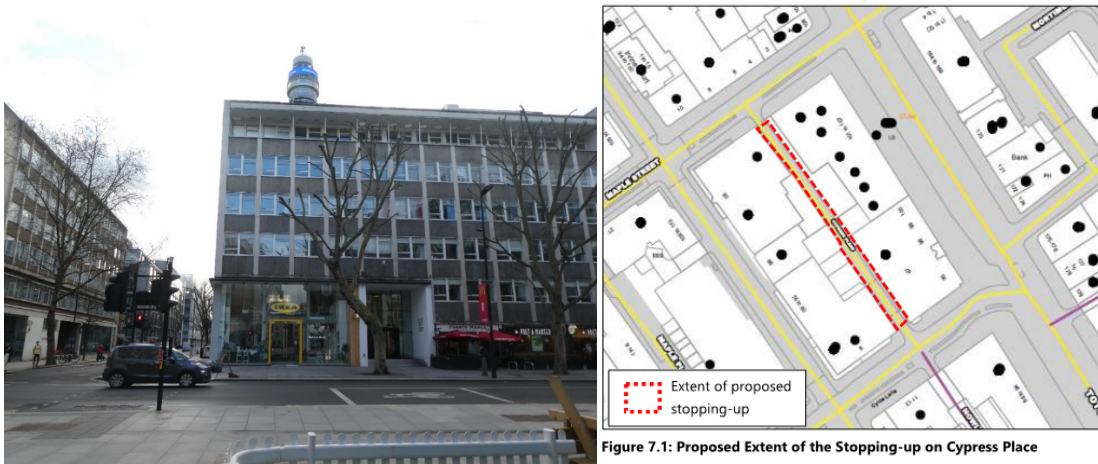


Figure 11.1: images of existing building and location of Cypress Place.

- 11.2 London Plan policy T1 (Strategic approach to transport) states that proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. It also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Car parking

- 11.3 The redevelopment of the site would remove the existing basement parking for 17 cars and the 14 spaces at grade in Cypress Place. This is welcomed and the whole development would be subject to a car-free planning obligation secured by s106 legal agreement in accordance with policy T2. Limited existing parking and loading bays within Cypress Place which serve the adjacent office development (the Qube, 90 Whitfield Street) would be retained and are not a consideration for the current application. A single additional disabled parking space is proposed at-grade within Cypress Place. This complies with CPG Transport clause 5.19 and is acceptable.

Cycle parking

- 11.4 The Transport Assessment (TA) sets out that the long stay cycle parking provision in the basement would meet the minimum provision of the London Plan (Table 10.2). The TA commits to supporting the promotion and ease of use of the cycle facilities by providing a dedicated cycle access point to the building, with appropriately-sized cycle lift and stairs with cycle channel, and the

provision of changing facilities, showers (minimum ratio of 1 per 10 cycle spaces), 1:1 lockers and larger/adapted spaces. The proposed principles of cycle provision are acceptable and condition 7 would secure all such measures.

- 11.5 As there is no space within the curtilage of the site for short stay cycling at street level, the spaces would need to be provided in the public realm. The majority of the stands required to meet London Plan requirements arise from the retail component of the development. The TA purports that existing on-street stands cater adequately for retail provision and therefore propose a reduced number of stands. However, officers consider that the short stay cycle standards should be met in order to achieve the strategic aim of significantly increasing cycle use. As the cycle stands will have to be located on the public highway the Council will secure funding of £250 per stand (2 cycle spaces) required to meet the London Plan standards, through a head of term in the s106 'Short Stay Cycle Contribution'.

Trip generation

- 11.6 The submitted TA includes details of trip generation analysis from the TRICS trip generation software. The results predict the proposed development would generate a maximum of 493 trips in the AM peak and 493 trips in the PM peak. The pedestrian impact in the immediate vicinity of the site is underestimated and is considered to be significant. A submitted draft workplace travel plan demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. A strategic workplace travel plan and associated monitoring and measures contribution of £9,762 would be secured by a section 106 planning obligation
- 11.7 Further information about the impact of the scheme on the capacity of the Underground was received during the assessment in response to TfL's requests. TfL are now satisfied that the development will not have a significant impact.

Deliveries and other servicing activities

- 11.8 The existing site and adjoining Qube building are serviced from Cypress Place. The proposal would re-purpose Cypress Place as a dedicated service yard for the city block, with access from Maple Street. Off-street servicing is welcomed. Once Cypress Place is closed as a right of way, the delivery route from Maple Street via the Qube undercroft would need to be protected to ensure servicing is safeguarded. A Service Yard Safeguard head of term would be secured by the s106 legal agreement to protect the right of access from Maple Street and to enable the use of the yard for servicing for the lifetime of the development.
- 11.9 The two loading bays will provide sufficient capacity for the predicted number of deliveries, and space is provided to allow vehicles to enter, turn and leave in a forward gear. Effective management of the limited number of bays will be essential deliveries to avoid a negative impact on the surrounding street

network. A Delivery, Servicing and Waste Management Plan would be secured by s106 legal agreement, with a specific focus on the need for :

- a coordinated and scheduled delivery booking system between occupiers of the building and with the relevant facilities management in the Qube building, with consideration of dwell times and capacity of the service yard;
- encouraging and enabling consolidation of deliveries and waste collection and sustainable freight; and
- the management of any deliveries or collections which may involve materials with specific health and safety implications, such as may be associated with life science activities.

Stopping up

11.10 The development would require Cypress Place to be closed as a public highway, across an area of c.425sqm. A stopping up order would need to be agreed through a separate highways process. A movement study of Cypress Place indicates modest levels of existing use of the route and the applicant has advised that there are no services running under Cypress Place which will require diversion. The route closure would have limited impact on the freedom or ease of public movement in the local area, however the loss of public realm and a right-of-way is a significant consideration and would require mitigation. This is considered in detail in section 8 Open Space above. A Head of Term ‘Stopping up Application’ would be added to the s106 legal agreement, requiring the developer to apply for a Stopping-Up Order prior to commencement.

Managing and mitigating the impacts of construction

11.11 The site is in Camden’s Central London Cumulative Impact Area for considering the effects of construction. A framework Construction Management Plan (CMP) has been submitted in support of the planning application which indicates that the construction programme will take three years, with a proposed start date of June 2022. Further details would be secured once construction contractors are engaged prior to commencement and would be secured by a head of term on the s106 legal agreement for a Demolition and Construction Management Plan. The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network and due to the location of cycle and pedestrian routes adjacent to the site. The CMP would need to take account of the potential cumulative impacts on the local highway network arising from other developments which are ongoing or planned in the locality. Once a contractor is retained engagement will start on the CMP with local residents/businesses, Members and officers. Where consultees identify sufficient interest or concern about impact on local amenity the s106 will require a Construction Working Group to be convened for the duration of the works.

CMP Implementation Support Contribution

- 11.12 A CMP Implementation Support Contribution will be required in order to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with and the planning objectives achieved. The development falls within the High Impact/Large development category in the February 2021 advice note on Implementation Support Contribution levels and the support contribution is therefore £28,520, and would be secured by s106 legal agreement.

Construction Impact Bond

- 11.13 Construction activity can cause disruption to daily activities, however a well-run site that responds to the concerns of residents can greatly improve the situation. While most sites deal quickly and robustly with complaints from residents, and reinforce the requirements of the CMP with site operatives, there can be situations where this does not occur and officers in the Council are required to take action. Due to the scale of the development, duration of works and sensitive location of the site, a bond of £30,000, in accordance with the Council's published note on Construction Impact Bonds, would be secured as a head of term in the s106 legal agreement. The bond will be fully refundable on completion of works, with a charge only being taken where contractors fail to take reasonable actions to remediate issues upon notice by the Council.

Excavation in close proximity to the public highway

- 11.14 The proposal would involve significant basement excavations in close proximity to the public highway adjacent to the site. In order to ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations the applicant would be required to submit Approval In Principle (AIP) reports to Camden's Highways Structures & Bridges Team (Engineering Services) for assessment. The AIP reports would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site and an explanation of any mitigation measures which might be required. The necessary AIP reports and an associated assessment fee of £1,800 (per report) would need to be secured as s106 planning obligations. It is advised that the applicant and the construction contractor liaise with the Council's structure manager to determine the number of reports required.

Pedestrian, cycling and environmental improvements

- 11.15 The development would introduce a substantial increase in new office related trips to the area, as detailed in the Trip Generation section above. The Council, through its policies and strategies aims to encourage active travel such as walking and cycling as the primary mode of transport for short journeys within the borough, and is committed to improving cycling and pedestrian routes in the area. The Council will seek to secure a Pedestrian, Cycling and Environmental (PCE) improvements contribution of £370,586. This figure is based on estimates of concept work to Chitty Street which would close one end of the

street, provide build-outs on Charlotte Street to support easier pedestrian crossing links to Bedford Passage on the west, plant new street trees and areas of greening/SUDs if feasible and the funds stretch to future maintenance.

11.16 The resulting financial contributions are identified as follows:

- **£370,586** : Pedestrian and Environmental Improvements contribution based on concept landscaping and public realm improvements locally.

11.17 It is therefore proposed to include a Head of Term in the s106 legal agreement to secure financial contributions as set out above as part of the local Pedestrian, Cycling and Environmental (PCE) improvements contribution. At this stage the Council cannot commit to delivery of specific proposals, not least because of the need to engage the public and stakeholders/statutory bodies in consultation on the design and implementation of the various components. However, where possible and appropriate the local improvements would incorporate the principles of the indicative proposals, notably the focus on :

- greening the streetscape and where possible incorporating rain gardens;
- planting street trees;
- pavement build-outs on Charlotte Street and Whitfield Street;
- short stay cycle parking spaces, and
- relocating parking bays where possible to support greening initiatives.

Highway works

11.18 The Council would need to undertake remedial works to repair any damage to the adjoining pavements and potentially the road surface on Whitfield Street following completion of the proposed development. The cost of these Highways Works have been estimated by the Council's highways team at £153,188 and comprise reinstatement of pavement and kerb around the building, carriageway along Whitfield St and setts on the junction of Howland and Whitfield streets. These works would be undertaken by Camden contractors and would generally follow the completion of the mains works on site. The costs would be secured by s106 legal agreement. A separate head of term would secure details of the interface/levels between the new building and the adjoining public highway.

Cycle Hire

11.19 TfL have highlighted that the cycle hire stands in Fitzrovia are very busy and have requested a contribution of £120,000 towards a new 30-bike docking station. A Head of Term would be added to secure the 'TfL bike hire contribution'.

Summary and Conclusions

11.20 The site is well located to optimise an opportunity for re-development by capitalising on the extensive public transport network which is available in the

central London area. The intensified use of the site would lead to a notable increase in trip movements associated with the building, however it is expected that the extensive provision of on-site cycling facilities, improvements to the local public realm and the successful implementation of a Travel Plan should mean that a high proportion of visitors and workers on the site will choose walking and cycling as a key means for arrival and departure at the site.

- 11.21 Overall the proposals have the potential to contribute to significant improvements to the streetscape and public highway around the site, with limited impact on the local transport network. Subject to the attached conditions and obligations secured via legal agreement, the proposed development is considered to comply with policies T1, T2, T3 and T4 of the Camden Local Plan and relevant London Plan policies.

12. SUSTAINABLE DESIGN & CONSTRUCTION

Demolition

- 12.1 London Plan policy SI2 (F) requires referable developments to undertake a Whole Lifecycle Carbon assessment and Lifecycle Assessment. Local Plan policy CC1 (part e) which requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building.
- 12.2 During the pre-application process, options for retaining the building were explored with a view to establishing whether the demolition was necessary and the outcomes are summarised in the Design & Access Statement. The brief for the studies was agreed with officers. Two options for retaining the structure whole or in part would involve release of less embodied carbon than the re-development approach. However both placed significant constraints and shortcomings on the development potential and the flexibility of the resulting building. A Lifecycle Assessment (LCA) was started at the beginning of the concept design stage and ensured early project team engagement in design decisions which would achieve flexibility and availability of carbon reduction opportunities. The submitted sustainability statement identifies aspirational Whole of Life Carbon (WLC) benchmarks for ensuring that the development is designed to achieve relatively low levels of embodied carbon levels. Subject to securing ambitious low embodied energy targets through the s106 legal agreement, officers consider that the benefits of the development outweigh the carbon cost of retaining the structure.
- 12.3 Condition 25 would secure use of circular economy principles during design and construction. Condition 26 would require the developer to submit post construction results to the GLA's WLC assessment template to help demonstrate actions taken to reduce life-cycle carbon emissions.

- 12.4 It is noted that the pre-demolition audit undertaken on the existing building will inform the demolition contractor of resources that could be repurposed and any materials that cannot be reused or reclaimed will be recycled, with a minimum diversion from landfill target of 95% set for demolition waste. This target would be secured by s106 legal agreement as part of the Energy and Sustainability Strategy.

Energy

- 12.5 Condition 5 will require a detailed Energy Statement to be submitted as part of any reserved matters applications, to demonstrate how the building design and performance has been informed against the relevant targets of each stage of the energy hierarchy (London Plan policy SI2: Be Lean, Be Clean, Be Green) and delivered carbon emission reductions for each relevant stage in accordance with Camden policies CC1 and CC2. The sustainability statement provides an overview of guiding principles for carbon reduction, embodied energy considerations, climate change resilience, water use, energy performance, material efficiency & waste minimisation and biodiversity & greening. The applicant is targeting BREEAM 'excellent', which is the minimum policy requirement for major developments, incorporating minimum targets of 60% in energy and water categories and 40% in materials. The Energy Statement would identify the means of renewable energy production in the building design and future reserved matters decisions would secure their implementation.
- 12.6 A carbon offset financial payment would be secured by s106 legal agreement to cover any shortfall on meeting net zero carbon and would be based on the carbon offset cost per tonne which is in place at the time of the approval of relevant a reserved matters application. The current price is £95 per tonne, and is applied over a 30-year term, as set out in CPG Energy.
- 12.7 A s106 head of term for 'Energy and Sustainability Plan' would secure the following measures as part of the resulting development:
- Embodied carbon targets of 550-600 kg CO₂e/m² GIA for modules A (Product sourcing and construction life cycle stage) and 250-300 kg CO₂e/m² GIA for modules B (Operational use) and C (end of life) (to be demonstrated in a Whole of Life Carbon (WLC) assessment;
 - BREEAM: Pre-assessment demonstration of achieving Excellent as minimum target with sub-targets of 60% in Energy and Water and 40% in Materials categories.
- 12.8 Policy expects sites within 1km of potential District Heat Networks to future proof for potential connection unless it is demonstrated to be unfeasible. The s106 head of term "Energy Strategy" will ensure the space is reserved in the building, for potential connection, subject to future feasibility once a connection becomes practicable.

- 12.9 The GLA energy hierarchy includes a new level 'Be Seen' which requires developments to monitor, verify and improve their energy performance during operation. Condition 24 would secure details of a transparent monitoring system and a requirement for the energy data to be uploaded to the GLA database at each stage of the development.
- 12.10 Subject to these measures, the proposals would meet the requirements of policies CC1 and CC2.

13. AIR QUALITY

- 13.1 The proposed development will be provided with heat and hot water via heat recovery from electric systems with no significant local emissions to air. The proposals include two emergency diesel back-up generators which will be tested monthly and a diesel-operated sprinkler pump which will only be used in an emergency. It is accepted that there will be the need for backup generators, however condition 29 would secure further information on the justification of the proposed size and consideration of alternatives technologies which do not generate diesel emissions.
- 13.2 The building is in an area of poor air quality, with the predicted annual mean concentration of 46.8µg/m³ at the ground floor façade exceeding the UK annual mean objective for NO₂ and above the WHO guidelines for particulate matter. Therefore consideration should be given to reducing the exposure to poor air quality for the workers in the building. The building will be subject to mechanical environmental control within air inlets provided at roof level, at a suitable distance from the roof flues. Condition 27 secures final details of the air handling system and air inlet locations.
- 13.3 The risk from construction-related dust was re-evaluated by the development team during the assessment and revised from 'low' to 'medium'. The proposed mitigation is acceptable for a medium risk site. Mitigation measures to control construction-related air quality impacts would be secured in the Construction Management Plan (CMP) as per the standard CMP Pro-Forma and air quality monitoring would be required on site. Condition 28 requires details of the proposed location, specification and operation of at least two air quality monitors. Condition 30 would ensure that all non-road mobile machinery meets the relevant emission standards.
- 13.4 Subject to the mitigation measures discussed above, the development would meet the air quality requirements of policies A1 and CC4 of the Local Plan.

14. FLOODING & DRAINAGE

- 14.1 The site is not within a Local Flood Risk Zone, however CPG expects greenfield run-off rates as the ideal outcome from new development. This would require rainwater attenuation of 160m³ and is not achievable by the proposals, however, during the assessment the rooftop areas were re-designed and the

extent of blue roof catchment areas was almost doubled. The proposals now include 125m³ of surface water storage from a blue roof area of 1227m² (with a catchment of c.1550m²). The revised measures would reduce the peak surface water runoff rate by 72% which comfortably exceeds the minimum 50% reduction in run off expected by CPG and London Plan policy and is acceptable. These measures would be secured as a minimum by condition 31.

- 14.2 Conditions 33, 34, and 35 have been added at Thames Water's request in order to secure methods for ensuring that the waste water and surface water infrastructure needs of the development are met, and a piling methodology which ensures protection of underground water infrastructure.
- 14.3 The absence of sufficient space for an appropriately sized tank have been cited as the reason why the proposals do not include rainwater harvesting. However, CPG (Water and Flooding) expects (para 2.14) major developments to demonstrate that grey water harvesting is not feasible. Therefore condition 32 requires a feasibility study to be submitted once the design details of the building are more certain.
- 14.4 The drainage and water management details have been assessed by the Council's Lead Local Flood Authority (LLFA) and are determined to be in accordance with policies CC2 and CC3 and are acceptable subject to conditions.

15. ACCESSIBILITY

- 15.1 Local Plan policy C6 (Access for all) and London Plan policy D5 (Inclusive Design) promote fair access for all and for barriers that prevent everyone from accessing facilities and opportunities to be removed.
- 15.2 The submitted Access Statement states that the developer is committed to ensuring that the facilities provided will give all building users the opportunity to participate independently whatever their use of the building, and maximize their individual abilities while enjoying safe and, wherever possible, independent participation. It confirms that the design would meet the technical aspects of Approved Document M of the Building Regulations. Inclusive access will be an essential consideration of the detailed design of the building and therefore condition 6 requires all Reserved Matters applications to be accompanied by a detailed access statement which sets out how policy C6 and the Building Regulation requirements for accessibility design would be met by the design.

16. CRIME & COMMUNITY SAFETY

- 16.1 Policy C5 of the Local Plan requires developments to demonstrate that they have incorporated design principles that contribute to community safety and security.

- 16.2 The Met police Design-out-crime officers welcome the closure of Cypress Place as it has been a focus of crime and anti-social behaviour due to its location, lack of natural surveillance and poor lighting. They have recommended that the newly enclosed service yard needs protecting with a vehicle barrier and separate pedestrian gate.
- 16.3 While the closure of Cypress Place may remove a concern about community safety and crime in the public domain, the newly enclosed service yard will require management and surveillance to ensure that it doesn't attract crime and community safety concerns from the surrounding streets. Following advice from officers, the revised design guideline on servicing and access acknowledges the concern and indicates that controlled access to the yard may be required and details would be worked up during the project. A new gate would be located outside of the application redline, but on land in the developer's ownership. Therefore a s106 legal agreement Head of Term 'Service Yard Safeguarding and Safety' would secure details of an holistic review of the community safety and servicing controls for the yard with a focus on public and private safety and security in mind.
- 16.4 The existing design allows limited engagement between the activities within the building and the public realm on Whitfield and Howland Streets and the proposed building would improve this arrangement significantly, allowing greater passive surveillance of the adjoining streets by occupants of the building.
- 16.5 Subject to the 'Service Yard Safeguarding and safety' s106 Head of Term, the proposals accord with policy C5 of the Local Plan 2017.

17. Land Contamination and Archaeology

- 17.1 The site investigation report includes an assessment of the risk of site contamination. A site conceptual model was prepared and strategies for dealing with the residual risk have been presented. Environmental Health colleagues have assessed the details and agree that they meet the terms of with policies G1, D1, A1, and DM1, subject to condition 36 which secures a verification report.

Radon

- 17.2 Environmental health officers have also raised a concern about the potential risk to future occupiers from exposure to radon gas and recommend that it may be prudent to consider radon reduction at the design stage. Officers consider that the risk of radon gas exposure has not been identified as sufficiently high to justify requiring a pre-commencement precautionary condition. However, the development team have acknowledged the Health & Safety Executive (HSE) obligations with respect to radon exposure in basements, and will ensure that this is factored into the development process. An informative would is added to

the decision notice drawing attention to the need to accord with the HSE obligations.

18. WASTE MANAGEMENT

- 18.1 Camden Local Plan policy CC5 (Waste) aims to make Camden a low waste borough by reducing the amount of waste produced in the borough and increasing recycling and the reuse of materials.
- 18.2 As discussed in section 11 above, servicing and waste collection vehicles will access the site via Cypress Place from Maple Street, as per the existing situation. The planning statement sets out that waste storage will be provided in accordance with British Standard (BS) 5906:2005 (as required by Camden Planning Guidance). Furthermore the waste storage and collection areas will be within the site and will not require use of the public highway. Condition 37 requires details of the location, design and method of waste storage and removal including recycled materials for all parts of the development. Final details of the movement, control and management of waste vehicles coming to the site will be required as part of the Delivery Servicing and Waste Management plan head of term, secured by s106 legal agreement.

19. ECONOMIC BENEFITS, LOCAL EMPLOYMENT & PROCUREMENT

- 19.1 Development Plan policy E1 (Economic development) and SALP Strategic Policy KQ1 (consultation draft wording is set out in Appendix A) set out presumptions for how major proposals for additional employment floorspace within the Knowledge Quarter Innovation District should contribute to creating and supporting the conditions for positive growth of the local Knowledge Economy and a successful and inclusive economy in Camden.
- 19.2 The development has the potential to provide employment opportunities for local people during both the construction and end-use phases. Policies E1, draft KQ1 and the Employment & Premises CPG expect development to provide employment and training obligations in order to bring opportunities to local communities, by creating pathways into good quality work and addressing inequalities. CPG notes (para 51) *“Developers may need to fund or provide construction training opportunities for local residents related to a development, help create work experience placement opportunities and career education opportunities across different roles and specialisms, either through recognised local initiatives or partnerships (e.g. Kings Cross Construction Skills Centre (KXCSC)), or Camden STEAM, or through in-house training schemes operated by their contractors and agreed with the Council’s Inclusive Economy Team.”*
- 19.3 The draft SALP policy text places an emphasis on ensuring *“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.*

London Plan policy E11 (Skills and opportunities for all) states *that “Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases”*.

- 19.4 A head of term ‘Employment & Training Plan: Construction Phase’ would be added to the s106 legal agreement which will require the developer and future occupants to commit to **Construction** employment related benefits from the development. These outcomes will include:

Construction stage:

- The project construction contract cost is estimated to be c.£65M. CPG expects one construction apprentice position per £3M construction contract, which equates to **22 apprentices** over the duration of the office build; paid at least London Living Wage, and pay the Council a support fee of £1,700 per apprentice. Recruitment of construction apprentices should be conducted through the Council’s King’s Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council’s Economic Development team.
 - Work to CITB benchmarks for local employment when recruiting for construction-related jobs
 - Provide one construction work placement opportunity per 500smq of net additional floorspace, of not less than two weeks each, to be undertaken over the course of the development, to be recruited through the Council’s King’s Cross Construction Skills Centre. *[By way of illustration, for the reserved matters applications this equates to 17 posts for the office building and 14 for the life-science building.]*
 - Sign up to the Camden Local Procurement Code to work towards a local procurement target of 10% of total procurement value and include promotion of local businesses to construction workers
 - Provide a local employment, skills and local supply plan setting out a plan for delivering the above requirements in advance of commencing on site
 - Facilitate at least 1 supplier capacity building workshops/Meet the Buyer events to support Camden SMEs to tender for construction contracts in relation to the development
- 19.5 It is estimated that the office-based approach to development would support an uplift of approximately 595 jobs on site. The life-science approach would have a lower employment density (estimated uplift of 135 jobs) due to the additional floorspace required for the laboratories and support space. As a speculative development, specific knowledge-economy outcomes would be largely dependent on future (unknown) occupiers and their participation in Knowledge Economy activities, however it is considered that both development outcomes (office or life-science) have the potential to support the wider aims of the Knowledge Quarter Innovation District, in accordance with policy KQ1. By virtue of its more targeted approach, the life-science building provides a more direct opportunity for participation in KQID activities and related social value outcomes than the office building, but the latter also holds potential for

occupation by occupier(s) whose business is significantly involved in the knowledge economy. A head of term 'Employment & Training Plan: End User Phase' (see list below) would be added to the s106 legal agreement which will require the developer and future occupants to commit to **End User** employment related benefits from the development.

- 19.6 In order to maximise the potential of the development to deliver beneficial Knowledge Economy outcomes, as expected by draft policy KQ1, officers consider it is important to maximise the prospect of the building being occupied by tenants who are primarily active in the priority Knowledge Economy sectors identified in the Science & Innovation Audit (SIA). Therefore a Knowledge Economy Occupier Strategy would be secured alongside the End User Employment head of term for the life science building. The Occupier Strategy would require the marketing of a life-science based development to focus on seeking tenants in the three SIA priority areas. The End User outcomes would be ring fenced (as far as possible) to Camden schools and residents in order to ensure that the opportunities have a positive local impact.

End User (future occupants) stage:

- Pay London Living Wage as a minimum salary for all direct and indirect (contractor) on site workers/employees
- Provide end-user work placements linked to future occupancy levels, for Camden students, preferably aged 16+, to be recruited through the Council's Inclusive Economy team or directly with Camden state schools/college; *[by way of illustration for the current reserved matters applications, this would equate to 8 end-user placements in the office building and 4 in the life-science building]*
- Provide rolling end-use apprentice positions linked to future occupancy levels, for age 16+, paid at least London Living Wage, up to Level 4 standard, ring-fenced to Camden schools and preferably targeting Knowledge Economy sectors of employment; *[by way of illustration for the current reserved matters applications, this would equate to 4 rolling end-user apprentices in the office building and 2 in the life-science building]*
- Promoting the Camden STEAM programme and the Camden STEAM employer pledge;
- Provide Employment & Training contribution linked to future occupancy (as per formula in Employment CPG) to be used by the Inclusive Economy service to support employment and training activities and local procurement initiatives. *[by way of illustration for the current reserved matters applications, this would equate to £174,711 for the office building or £39,640 the life-science building];*
- Support the Good Work Camden programme by:
 - Joining the Inclusive Business Network and committing to provide supported employment opportunities such as supported internships
 - Advertising vacancies in partnership with Good Work Camden and its relevant local employment support providers to create pathways into knowledge economy jobs

- Committing to attend job fairs to promote opportunities to local residents
 - Join Camden Climate Change Action and support local circular economy initiatives relating to waste reduction, recycling and re-use.
- 19.7 Draft policy KQ1(f) in the SALP seeks to secure at least 20% of additional employment floorspace as affordable workspace. A viability study has been commissioned to test the assumptions of the SALP, and it is likely that the 20% figure in the SALP will be subject to review once the study is complete and published in due course. Although responses to the SALP consultation have raised concerns about the justification for the 20% figure, it is consistent with examples given in CPG (Employment sites and business premises, March 2018) which include:
- 20% of the workspace to be provided at 50% of comparable market values;
 - an element of the floorspace to be offered to an affordable workspace provider (to be approved by the Council) at a peppercorn rent (i.e. a very small or token rent);
 - 20% of the desks in the open workspace (hot-desking) area to be offered at 50% of market value.
- 19.8 The redevelopment of the Tottenham Mews site includes 364sqm of affordable workspace at ground and basement representing 3.8-4.7% of the employment floorspace uplift across the sites. The workspace is included as part of the two-site response to the policy expectation set out above. Officers' preference would be for the affordable space to be on the Network Building site, but accept that Tottenham Mews, which is a brief walk from the Network Building, and still within the Knowledge Quarter Innovation District, is an acceptable location. Furthermore the location of the affordable workspace on the corner of the Mews site sits more comfortably next to the link with Bedford Passage than residential use would, due to the proximity to passers-by.
- 19.9 The full details of the affordable workspace assessment are assessed in the Tottenham Mews committee report which finds the proposals acceptable, subject to securing the relevant terms of affordability, fitout etc through s106 legal agreement. A delivery clause is included in the Outline Application s106 legal agreement which requires that the affordable workspace at Tottenham Mews is transferred to a workspace provider and made available for occupation prior to the occupation of the Network Building.
- 19.10 Subject to securing the details set out above in the s106 legal agreement, the proposals are welcomed and are in accordance with policies E1 and E2 of the Camden Local Plan and KQ1 of the draft SALP.

20. HEALTH AND WELLBEING

- 20.1 The submitted Health Impact Assessment (HIA) has been drafted to address the requirements of policy C1 (Health & Wellbeing) which aims to improve and

promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural welling and reduce inequalities.

- 20.2 The document contains a matrix assessing the proposal in 11 key areas which contribute towards the overall health of occupiers and visitors of the development, including contributions to community-accessible facilities, air quality, crime reduction, open space and minimising the use of resources.
- 20.3 Amongst other benefits, the HIA identifies positive health impacts from the contribution that the development will make to improvements in the local public realm, the promotion and support for cycling facilities and reduction of on-site car parking. The proposal is considered to be acceptable in terms of its contribution to improving health and accords with policy C1.

21. EQUALITY

- 21.1 Section 149 of the Equality Act 2010 sets out the Public Sector Equality Duty (PSED). A public authority must, in the exercise of its functions, have due regard to the need to:
- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 21.2 As part of this application officers have considered equalities impacts, particularly on groups with protected characteristics. The development itself would not introduce any specific function or feature that favours or disadvantages a specific grouping within the nine protected characteristics nor that discriminates against age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and therefore a formal Equalities Impact Assessment has not been undertaken by the Council.
- 21.3 Officers are not aware of any specific associations between the existing or proposed use of the site and any group with protected characteristics. As discussed throughout other sections of this Committee Report, it is considered that none of the neighbouring occupiers are unduly harmed or would be threatened by the development, either by the temporary construction works or ongoing use.

22. FIRE SAFETY

- 22.1 Policy D12 (Fire safety) of the Publication London Plan requires all major development proposals to be submitted with a Fire Statement. The application

has been supported by a Fire Statement which includes details of the fire strategy.

- 22.2 The fire strategy for the non-residential areas is based on guidance in BS9999: 2017 Fire safety in the design, management and use of buildings – Code of practice. The above ground levels will be served by one firefighting stair and one protected escape stair. Both stairs will discharge at ground level, via protected exit passageways, to Cypress Place at the rear of the building. Disabled refuges will be located within the protected stairways at every level, each with emergency voice communication networked to the building manager's room at ground floor. Two external disabled refuges will be located at roof level to serve the terrace occupants. Sprinkler protection will be installed throughout the Network Building to compensate for the introduction of exposed CLT within its superstructure.
- 22.3 Given the emerging weight in the planning process for fire safety, condition 38 would require a further Fire Statement to be produced by an independent third party and submitted for approval prior to first works on the building envelope. The submitted details would be assessed by the Council's Building Control department.

23. PHASING and DELIVERY

- 23.1 The application is accompanied by an indicative programme for construction (accompanying the Construction Management Plan) which indicates 36 elapsed months (150 weeks) of construction and fitout is required to complete the building from Site Set-up to Practical Completion.
- 23.2 It is understood that the developer is keen to start work on site as soon as practicable. Officers welcome the commitment to delivery and are strongly supportive of timely commencement. In order to keep track of the linked delivery programmes for the housing at Tottenham Mews and the Network Building, the s106 legal agreement would secure a 'Development Delivery Plan' for the two schemes, so that all parties may stay informed of progress, milestones and dependencies. As part of a two site approach to development it is essential that the public benefits of the affordable housing and affordable workspace are completed and ready for occupation prior to first occupation of the Network Building, in order to meet the policy requirements of G1 (Delivery & Location of Growth), H2 (Maximising the supply of self-contained housing from mixed-use schemes), H4 (Maximising the supply of affordable housing), E1 (Economic Development), KQ1 (Supporting growth in the Knowledge Quarter Innovation District) and IDS1 (Network Building). The s106 legal agreement includes a requirement for the Mews development to be completed prior to occupation of the Network Building.

24. COMMUNITY INFRASTRUCTURE LEVY

24.1 Since 2012, all developments in London which result in the addition of over 100sq. m GIA floorspace (with exceptions given to affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG.

24.2 The development is dependent on a number of CIL factors which make it complex to demonstrate the likely CIL liability, including:

- The floorspace uplift secured as part of reserved matters (within the maximum limits of the parameter plans);
- Where lawful use is demonstrated (ie the building is not vacant) only the uplift in floorspace is liable for CIL. In order to secure occupancy/in-use CIL credit for floorspace, evidence of occupation is required for at least 6 months over 3 years before the decision; and
- Credit for existing uses can only be applied where the uses prevail in the new development.

	CIL Liability (Camden + Mayoral)	
Proposed use & floorspace (sqm GIA)	Minimum liability (uplift only**) Camden CIL2 Zone A/ Mayor CIL Band 1	Max liability Camden CIL2 Zone A/ Mayor CIL Band 1
Office (Class E g(i)) 17225sqm (10140sqm office uplift)	Camden : £1,115,400 (10140sqm@£110/sqm) + Mayor: £1,892,935 (10140sqm@186.68/sqm)	Camden: £1,894,750 (17225@£110/sqm) + Mayor : £3,215,563 (17225@186.68/sqm)
Retail (A1-A3): 521sqm (max)	No uplift	Camden: £16672 (521sqm@£32/sqm) + Mayor: £86226 (521sqm@165.50/sqm)
Lab-research (Class E g(ii)): 16022 sqm (8450sqm total commercial uplift)	Camden: £929,500 (8450@£110/sqm) + Mayor: £1,577,446 (8450sqm@186.68/sqm)	Camden: £1,762,420 (16022@£110/sqm) + Mayor: £2,990,987 (16022@186.68/sqm)
Retail (A1-A3): 487sqm (max)	No uplift	Camden: £15584 (487sqm@£32/sqm) + Mayor: £8,0599 (487sqm@165.50/sqm)
Total: Office building	£3,008,335 (min)	£5,213,211 (max)
Total:	£2,506,946 (min)	£4,849,590 (max)

Lab building		
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** In order to secure CIL credit for occupied floorspace, evidence of occupation is required for at least 6 months over 3 years before the decision;

24.3 Please note that the floor areas noted above are approximate and sums are indicative. Final payable contributions would be calculated following approval of the scheme by the Council's CIL officers.

25. CONCLUSION

25.1 The applicant's vision for the site is to provide a high-quality sustainable flexible office/life-science building of exemplary design which complements and integrates with the surrounding context.

25.2 The viability of the commercial re-development of the site is predicated on locating all housing associated with the redevelopment of 14-19 Tottenham Mews, which is the subject of item 4 on the committee agenda. Commercial development on the Network Building site and residential development on the Mews site are identified as the primary respective land use aims of the two site-specific policies in the Fitzrovia Area Action Plan and the draft Site Allocations Local Plan (SALP). The two-site proposal is for 23 affordable homes to be located in Tottenham Mews, which is an uplift of 16 homes across the two sites, taking account of the existing housing on the application site. The Mews site would also provide 364sqm of affordable workspace at ground and basement levels.

25.3 The applicant has set out that delivering housing off-site enables a greater amount and improved quality of non-residential floorspace at the Network Building, which improves the overall viability of the development and therefore allows for a greater amount of affordable housing to be delivered at Tottenham Mews than would have otherwise been possible. The submitted viability assessment, which has been audited by the Council's independent viability consultants, confirms that the development is not currently viable and that the development makes the maximum reasonable contribution to the provision of affordable housing.

25.4 The two-site approach would not achieve the SALP capacity estimates for the sum of the two sites. Under the housing delivery provisions of the NPPF paragraph 11 is engaged and this puts a presumption in favour of approving schemes which deliver housing. Balancing the public benefits of the certainty of delivering 23 wholly *affordable* homes, all off-site, against the possibility of securing a greater number of homes on both sites as part of some future development proposal, officers consider that the delivery of 23 affordable homes carries greater weight and justifies the proposed approach to development across two sites.

25.5 The existing building makes a limited contribution to the surrounding townscape and the principle of its demolition is not resisted on design grounds. The whole

of life carbon cost of demolition and re-development is projected to be greater than extensive refurbishment. However, refurbishment would yield significantly less floorspace and would be unlikely to be viable. The proposed benefits arising from the re-development outweigh the environmental arguments against demolition.

- 25.6 The height, mass and bulk permitted by the parameter plans would lead to no significant loss of daylight or sunlight to sensitive neighbouring windows, and a number of controls on the use of roof terraces, plant noise and the control of odour from potential restaurants would ensure that the development would not have a detrimental impact on the quality of amenity of local residents.
- 25.7 The Design Guidelines ensure that the proposed building would improve the architectural quality of this prominent corner of Tottenham Court Road and engage more successfully with the streets on all three sides of the building. The proposals show generosity to the public realm, with good use of green infrastructure and would help to activate Howland Street and enhance this part of the town centre. Composition and detailing have been well considered and the proposals demonstrate a high quality example of how to positively plan for growth in an established town centre.
- 25.8 The closure of Cypress Place as a public through route which is required in order to deliver the development would be offset by a financial contribution to local improvements to the public realm. The illustrative proposals show vehicle road space re-purposed as wider pavements, space for street trees and soft landscaping which provides sustainable urban drainage (SUDs). Officers are supportive of these measures, which would be subject to separate highways design and public engagement processes.
- 25.9 The increased size of the development would make this site significantly more prominent in local views, but the design guidelines would require applications for reserved matters to demonstrate that the building would be of significantly higher architectural quality than the existing and would contribute positively to the streetscape, preserving the setting of the nearby conservation areas.
- 25.10 The parameter plans allow the height of the building parapet to exceed the London View Management Framework threshold by 60mm and would also permit minor additional features of the building (lift overruns and terrace balustrades) to add to the breach. London Plan policy HC4 requires conflicts with the protected viewing corridors to be avoided, however officers therefore consider that the minor incursions are acceptable, as they would not undermine the viewer's ability to perceive the visual relationship between the three towers of the Palace and therefore there is no conflict with the aims of the policy.
- 25.11 The building would restrict some local views of the grade-II listed BT Tower as seen from Tottenham Court Road, causing harm to the setting of the designated heritage asset. This harm would be at the lower end of ***less than substantial harm***. Section 66 of the Listed Buildings Act states that "*In considering whether*

to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.” The application of section 66 imposes a duty to treat harm to a designated heritage asset as a consideration to which the decision-maker must give ‘**considerable importance and weight**’ when carrying out the balancing exercise, and that it is not open to the decision-maker merely to give the harm such weight as they think fit, in the exercise of their planning judgment.

25.12 The development at the Network Building gives rise to significant public benefits in the form of social, economic and environmental outcomes, as follows:

- A building which provides flexibility for future employment uses and responds to the needs of the knowledge economy;
- Construction and end-user employment measures including apprentices, work placements, obligations for London Living Wage for on-site employees and contractors, support for the Good Work Camden programme;
- Contribute to enhanced public realm around the building and in the wider area;
- Significant enhancement in street level interaction between the building and the surrounding streets; and
- A highly sustainable building of exemplary design, with considerations of whole of life carbon integrated into decisions of design and construction.

25.13 In order for the re-development of the Network Building to be acceptable in terms of planning policies on mixed-use development, housing, and economic development, the linked application for Tottenham Mews would also need to be granted planning permission subject to s106 legal agreement. The following beneficial outcomes from the re-development of Tottenham Mews would therefore be added to the above list:

- Affordable homes (23 in total: 10 social affordable rent and 13 intermediate rent);
- Affordable workspace (50% discount on market rate for 10 years)

25.14 The development would deliver significant public social benefit as set out above. It would also cause less than substantial harm to the setting of the grade-II listed BT Tower. NPPF paragraph 196 instructs that “*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal*”. However it must be clear that section 66 of the Listed Building Act imposes a duty to treat harm to a designated asset as a consideration to which the decision-maker must give ‘considerable importance and weight’, and not un-tilted balance. Officers consider that despite this weight

of presumption, the package of benefits which would accompany the proposed development are considerable and sufficient to outweigh the extent of harm identified to the affected views of the BT Tower.

25.15 The issues raised by the Mayor in the Greater London Authority's (GLA) Stage 1 letter have been addressed through further clarifications and measures which would be secured by s106 legal agreement or by condition.

25.16 The proposed development is therefore recommended for approval.

26. RECOMMENDATION

26.1 **Grant conditional Planning Permission following (i) referral to Mayor of London for his direction and (ii) completion of section 106 Legal Agreement to secure the Heads of Terms set out below.**

[This recommendation is subject to Planning Committee having made a resolution to Grant Conditional Planning Permission subject to section 106 Legal Agreement for Item 4 on this agenda relating to Tottenham Mews (Ref 2020/5633/P)]

LEGAL AGREEMENT HEADS of TERMS

Housing

- **Deferred Affordable Housing PIL contribution (capped according to scheme shortfall @ £1500/sqm)**
- **Deferred Market Housing PIL contribution (capped according to scheme shortfall)**
- **Delivery of Off-site affordable housing**
 - Transfer of completed Affordable Homes at Tottenham Mews site to Registered Provider prior to first occupation of Network Building.

Transport/highways

- **Car-free development**
- **s278 and Level Plans**
- **Stopping Up Application**
- **'Approval In Principle' agreements with the Council's Highways department for basement works adjacent to public highway on three sides**
- **Construction and Demolition Management Plans (C/DMPs)**
- **CMP implementation support contribution of £28,520**
- **Construction Impact Bond - £30,000**
- **Short Stay Cycle contribution – £250 per stand (2 spaces) to meet London Plan standards for RM approvals**
- **Service and Waste Management Plan**
 - Including requirement for site FM to liaise and coordinate management and scheduling of service yard with adjoining occupiers of Qube (90 Whitfield Street)

- **Highways costs of £153,188.11** - cost of highways works comprising reinstatement of footways adjacent to building;
- **Strategic workplace Travel Plan Monitoring & Measures**
 - Including monitoring contribution of £9762
 - TRICS survey results to be shared with TfL and Camden
- **Pedestrian and Environmental Contribution**
 - Financial contribution of £370,586
- **Service Yard Safeguarding & Safety**
 - Protect the right of access from Maple Street and to enable the use of the yard for servicing for the lifetime of the development.
 - Review of the community safety and servicing controls for the yard with a focus on public and private safety.
- **TfL Cycle Hire scheme contribution:**
 - £120,000 to be applied to new docking station nearby.

Design and construction

- **Retention of Architect**
- **Development Delivery plan**
 - A programme and milestones for delivery of the Network Building

Environmental

- **Carbon Offset Contribution**
 - To be paid pre-implementation of approved RM at £95/tonne on net zero shortfall from RM details
- **District Energy Network Futureproofing**
- **BREEAM Interim and Final Certificates Submission –**
 - Excellent as a minimum
- **Energy and Sustainability Strategy**
 - Securing policy targets in each of Be Lean, Be Clean, Be Green measures
- **Open Space:** Financial contribution based on uplift in occupancy [*By way of illustration, for the reserved matters applications this equates to (£118,800 for the office building, £26,973 for life-science building)*]
- **Public Realm Replacement:**
 - Financial contribution of **£777,457** towards replacing the loss of Cypress Place public realm;
 - Subject to separate highways process, works to include : tree planting; SUDs; pavement widening; maintenance and street cleaning/litter picking of soft landscaping (including SUDs) over a 20 year period;

Employment

- **Off-site affordable workspace:**
 - Handover of completed affordable workspace at Tottenham Mews to affordable workspace provider prior to first occupation of Network Building.
- **Knowledge Economy Occupier Strategy**
 - Marketing strategy for life-science building to ensure vacant space is suitably marketed for occupation by operators principally involved in

knowledge economy activities and to use the building's capacity for lab-based uses.

- **Employment and Training Plan: Construction Phase**

- Work to CITB benchmarks for local employment when recruiting for construction-related jobs
- Advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of one week before marketing more widely
- Provide one construction work placement opportunity per 500smq of net additional floorspace, of not less than two weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre. *[By way of illustration, for the reserved matters applications this equates to 17 posts for the office building and 14 for the life-science building.]*
- Recruit 22 construction apprentices (one per £3 million of **£65M build costs**), paid at least London Living Wage, and pay the Council a support fee of £1,700 per apprentice. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
- Sign up to the Camden Local Procurement Code to work towards a local procurement target of 10% of total procurement value and include promotion of local businesses to construction workers
- Provide a local employment, skills and local supply plan setting out a plan for delivering the above requirements in advance of commencing on site
Facilitate at least 1 supplier capacity building workshops/Meet the Buyer events to support Camden SMEs to tender for construction contracts in relation to the development

Employment and Training Plan: *End-user phase*

- Pay London Living Wage as a minimum salary for all direct and indirect (contractor) on site workers/employees
- Provide end-user work placements linked to future occupancy levels, for Camden students, preferably aged 16+, to be recruited through the Council's Inclusive Economy team or directly with Camden state schools/college; *[by way of illustration for the current reserved matters applications, this would equate to 8 end-user placements in the office building and 4 in the life-science building]*
- Provide rolling end-use apprentice positions linked to future occupancy levels, for age 16+, paid at least London Living Wage, up to Level 4 standard, ring-fenced to Camden schools and preferably targeting Knowledge Economy sectors of employment; *[by way of illustration for the current reserved matters applications, this would equate to 4 rolling end-user apprentices in the office building and 2 in the life-science building]*
- Promoting the Camden STEAM programme and the Camden STEAM employer pledge;

- Provide Employment & Training contribution linked to future occupancy (as per formula in Employment CPG) to be used by the Inclusive Economy service to support employment and training activities and local procurement initiatives. *[by way of illustration for the current reserved matters applications, this would equate to £174,711 for the office building or £39,640 the life-science building];*
- Support the Good Work Camden programme by:
 - Joining the Inclusive Business Network and committing to provide supported employment opportunities such as supported internships
 - Advertising vacancies in partnership with Good Work Camden and its relevant local employment support providers to create pathways into knowledge economy jobs
 - Committing to attend job fairs to promote opportunities to local residents
- Join Camden Climate Change Action and support local circular economy initiatives relating to waste reduction, recycling and re-use.

27. LEGAL COMMENTS AND CONDITIONS

27.1 Members are referred to the note from the Legal Division at the start of the Agenda.

28. CONDITIONS AND REASONS

1	<p>Reserved Matters Approval</p> <p>No part of the Development hereby approved in outline shall be commenced until details of (a) Appearance and (b) Layout (the "Reserved Matters") have been submitted to and approved in writing by the Local Planning Authority.</p> <p>Applications for approval of the Reserved Matters shall be made to the Local Planning Authority before the expiration of 3 years from the date of this Decision Notice.</p> <p>The development must be begun not later than either three years from the date of this permission or two years from the final approval of the first Reserved Matters application, whichever is the later.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Control and support drawings & documents</p> <p>The development hereby permitted and all Reserved Matters applications made pursuant to condition 1 shall be in accordance with the approved plans and documents below, other than where those details are altered pursuant to the requirements of the conditions of this planning permission:</p> <p>Proposed Outline Parameter Plans : Prefix: 13538-A-: L-1-07-099 Basement Plan Rev01, L00-07-100 Ground Floor Plan Rev01, L01-07-101 First Floor Plan Rev01, L02_L06-07-</p>

102_106 Second - Sixth Floor Plan (Typical) Rev01, L08-07-108 Eighth Floor Plan Rev01, L09-07-109 Roof Plan Rev01;

Proposed Outline Parameter Elevations and Sections :

Prefix 13538-A-: E01-07-140 East Elevation Rev01, E02-07-141 South Elevation Rev01, E03-07-142 West Elevation Rev01;

Control Documents:

Revised Development Specification 28 May 2021 V2; Design guidelines (as contained in Design & Access Statement Outline Application Rev 01) ;

Supporting drawings:

Existing drawings : 13538-A-LXX-03-001 Site Location & Proposed Site Plans; Prefix 13538-A-: LG-01-099 Basement Floor Plan, L00-01-100 Rev 1 Ground Floor Plan, L01-01-101 First Floor Plan, L02_L03-01-102_103 Second & Third Floor Plan, L04-01-104 Fourth Floor Plan, L05-01-105 Fifth Floor Plan, L06-01-106 Sixth Floor Plan, L07-01-107 Seventh Floor Plan, RF-01-108 Roof Plan, S01-01-110 North / South Section 01, S02-01-111 North / South Section 02, S03-01-112 East / West Section 01, E00-01-120 East Elevation, E01-01-121 South Elevation, E02-01-122 West Elevation, E03-01-123 East Elevation (Cypress Place), E04-01-124 North Elevation (Cypress Place);

Demolition drawings: 13538-A-L08-02-100 Demolition Plan; 13538-A-E01-02-110 Demolition Elevation - Howland Street;

Supporting documents:

Archaeological desk-based assessment Issue 2 11/11/20 by MOLA;
Energy Statement The Network Building Issue 01 (30 October 2020) by Tft;

Air Quality Assessment: J4320A/1/F3 19 November 2020 air Quality Consultants;

Preliminary Ecological Appraisal Issue 2.0 10/11/20 by The Ecology Consultancy;

Arboricultural Impact Assessment April 2021 ref 200914-PD-11 by Tim Moya Associates;

Tree Schedule 200914-PD-10 (BS5837) by Tim Moya Associates;

Tree survey 200914-P-10 Sept 2020;

Daylight and sunlight report by Point 2 Surveyors Nov 2020 v: Planning V1 ref : P1618

Plant Noise Assessment 27891/PNA1/OA.Rev1 19/11/20 by Hann Tucker
Revised Office GLA_WLC_assessment_template_TNB_April21_V2.xlsx
Revised Life Science

GLA_WLC_assessment_template_TNB_April21_V2.xls

Circularity Strategy Table 1 of Appendix 2 of completed GLA Circular Economy Guidance table;

Fire Strategy Rev: 2 Issued: 11/12/20 by Norman Disney & Young
Access Statement by Proudlock Associates, Nov 2020

Surface Water Drainage Statement rev P2 10.05.21 by Elliottwood;

Transport Statement Nov 2020 by Caneparo Associates;

Sustainability Statement [200151/DVPL] by Tft 2020 ;

	<p>Financial Viability Assessment with Appendices 1-7 by DS2 18 May 2021; Health Impact Assessment by WYG Final Nov 2020; Heritage Statement and Townscape and Visual Impact Assessment by Donald Insall Associates Nov 2020; Construction Management Plan (and Proforma) Version 1 19/10/20 by Caneparo Associates; Workplace Travel Plan by Caneparo Associated Nov 2020; Statement of Community Involvement by Concilio; Planning Statement by DP9 Nov 2020.</p> <p>Reason: Any change to the development from the particulars assessed as above might have an impact which has not been identified and assessed. To ensure that the Development is undertaken in accordance with the approved drawings and documents, and otherwise conforms to the principles of sustainable development as described in the National Planning Policy Framework 2019</p>
<p>3</p>	<p>Outline parameters: Uses and floorspace permitted</p> <p>The quantum of built floorspace shall not exceed the maximum floorspace figures specified below in respect of each permitted land use:</p> <ul style="list-style-type: none"> (a) 17225 sqm (GIA) of commercial, business and service uses within Class E(g)(i) (Offices to carry out any operational or administrative functions) and E(g)(ii) (research and development of products or processes); (b) 521 sqm (GIA) of retail within class E(a) and/or food & drink for consumption (mostly) on the premises within E(b); (c) The total amount of floorspace in the Development shall not exceed 19974qm GEA as stated in the approved Development Specification. <p>Reason: To ensure that the Development is carried out in accordance with the approved plans and other submitted documents and to ensure that the quantum of floorspace remains within the approved parameters.</p>
<p>4</p>	<p>Reserved Matters: Basement Impact Assessment</p> <p>Applications for Reserved Matters shall be accompanied by a Detailed Basement Impact Assessment which demonstrates that</p> <ul style="list-style-type: none"> a. the finished floor level of the basement would be no deeper than 6.7m below ground level; b. the basement dimensions accord with the parameter plans as approved; and c. the basement proposals would not cause harm to neighbouring properties and the structural, ground, and water conditions of the area. <p>All works of basement design and construction shall be carried out in accordance with the detailed Basement Impact Assessment thus approved.</p>

	<p>Reason: To safeguard the appearance and structural stability of neighbouring buildings and the structural, ground and water conditions of the general area in accordance with the requirements of policy A5 of the London Borough of Camden Local Plan 2017.</p>
<p>5</p>	<p>Reserved Matters: Energy details</p> <p>Applications for Reserved Matters shall be accompanied by a Detailed Energy Statement which sets out how the development has followed the first three stages of the energy hierarchy (Be Lean, Be Clean, Be Green) and estimates the regulated CO2 emissions and savings achieved at each stage of the hierarchy.</p> <p>All works of basement design and construction shall be carried out in accordance with the detailed Energy Statement thus approved.</p> <p>Reason: To ensure that the development is designed to minimise the effects of climate change and meet the highest feasible environmental standards in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
<p>6</p>	<p>Reserved Matters : Design and Access statement</p> <p>Applications for approval of Reserved Matters pursuant to this permission shall be accompanied by a Design Statement which</p> <ol style="list-style-type: none"> a. explains the underlying approach of the design and explain how it addresses each of the Design Guidelines (as contained in Design & Access Statement Rev 01); and b. demonstrates how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the development and how inclusion will be maintained and managed by the development, in accordance with the advice and guidance set out in the Access Statement by Proudlock Associates Nov 2020.. <p>All inclusive measures and features (including those which go beyond Building Regulation requirements such as inclusive facilities management) shall be implemented in accordance with the details thus approved.</p> <p>Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy C6 of the London Borough of Camden Local Plan 2017.</p>
<p>7</p>	<p>Reserved Matters : Cycle facilities</p> <p>Applications for Reserved Matters shall include details of how the development would achieve the level of cycle parking set out in Table 10.2 of the London Plan and its supporting paragraphs, including facilities for disabled cyclists and supporting facilities, and how the facilities would be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.</p>

	<p>The development shall not be occupied until such time as the cycle parking and associated facilities this approved have been installed and made available for use. All such facilities shall be retained and maintained thereafter.</p> <p>Reason: To ensure a comprehensive and sustainable development and in order to provide satisfactory provision for cyclists in the development in accordance with policy T5 of the London Plan and T1 of the Camden Local Plan 2017.</p>
<p>8</p>	<p>Retail floorspace</p> <p>Within the area identified as Class E (a-b) on the parameter plans, the development shall provide floorspace of no less than 487sqm GIA of uses within Class E (A retail) and (B sale of food and drink for consumption on the premises) in accordance with the Development Specification and the floorspace shall be retained in retail/food & drink uses for the lifetime of the development.</p> <p>No more than one shop unit and 50% of the Class E (a/b) floorspace thus provided shall be in food & drink use.</p> <p>The ground floor of all retail Class E (a) uses shall at all times include a shop front display to the street.</p> <p>Reason: To ensure that the Development is carried out in accordance with the approved plans and other submitted documents and to safeguard the character, function, vitality and viability of the area and to secure an active retail frontage to assist with passive surveillance and pedestrian activity along Tottenham Court Road in accordance with policies G1, A1, TC1 and TC2 of the Camden Local Plan 2017.</p>
<p>10</p>	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, cctv cameras, television aerials, light fixtures or satellite dishes shall be fixed or installed on the external face of the buildings, other than those shown on the drawings approved as part of Reserved Matters planning approvals.</p> <p>Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
<p>11</p>	<p>Lighting strategy</p> <p>Prior to commencement of the relevant part of the development, a lighting strategy for the building and details of light fittings and fixtures to the exterior of the building and to all internal areas within 3m of the external glazing, shall be submitted to and approved in writing by the local planning authority.</p>

	<p>The strategy shall be developed with input from a specialist lighting engineer accredited by the Institute of Lighting Engineers and shall incorporate (inter alia) consideration of the impact of the lighting design on contributing to reducing crime, residential properties around the site, maintenance, whole life cost and energy use.</p> <p>Reason: To maintain a high quality of amenity and a safe environment, in accordance with Policies D1 and A3 of the Camden Local Plan 2017.</p>
<p>12</p>	<p>LVMF height restrictions</p> <p>The height of development within the bounds of LVMF strategic view 2B.1 (Parliament Hill towards the Palace of Westminster) shall not exceed the relevant limits 1-6 set out in the Roof Parameter Plan description of the Development Massing Design Guideline 4.3.5. (as found in the Design & Access Statement rev 1).</p> <p>No temporary or permanent structures or fixtures shall be present above the parapet line of the building at 59.01m AOD with the exception of the items identified in Design Guideline 4.3.5 (as found in the Design & Access Statement rev 1).</p> <p>Reason: In order to ensure that roof top accretions do not detract from the appearance of the building, does not detract from the visual amenity of the area and does not infringe or harm protected viewing corridors passing over the application site in accordance with policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017 and Policy HC4 London View Management Framework.</p>
<p>13</p>	<p>Nesting birds</p> <p>No vegetation and built structures potentially suitable as a bird habitat shall be removed except outside of the bird nesting season (Feb-August inclusive).</p> <p>Where this is not possible, an ecologist shall be engaged to assess any vegetation and built structures for active signs of nesting and in the event a nest is found an appropriate exclusion zone should be implemented around it until the young have fledged.</p> <p>Reason: In order to safeguard protected and priority species, in accordance with the requirements of Policy A3 of the Camden Local Plan 2017.</p>
<p>14</p>	<p>Tree protection</p> <p>Prior to the commencement of works on site, tree protection measures shall be installed and working practices adopted in accordance with the</p>

	<p>Arboricultural Impact Assessment by Tim Moya Associates dated April 2021 ref: 200914-PD-11.</p> <p>All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with BS5837:2012 and with the approved protection details.</p> <p>Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the Camden Local Plan.</p>
<p>15</p>	<p>Landscaping & biodiversity</p> <p>Full details of hard and soft landscaping, including a detailed strategy for sustainable maintenance, shall be submitted to and approved in writing by the local planning authority before the relevant part of the development commences.</p> <p>The details shall identify how the development responds to the Urban Green Factor target of 0.3, and incorporates the recommendations of the Preliminary Ecological Appraisal (Issue 2.0 10/11/20 by The Ecology Consultancy) including:</p> <ol style="list-style-type: none"> a. Wildlife planting to include native species and/or species of recognised wildlife value; b. Use of good horticultural practice including use of peat-free composts, mulches and soil conditioners; c. A prairie style of border planting for areas of planting beds to enhance the site for birds and bats; d. Installation of bird boxes for declining species such as house sparrow and starling; and e. Use of bespoke invertebrate habitats. <p>All such measures shall be installed/carried out in accordance with the details thus approved and maintained in accordance with the maintenance strategy.</p> <p>Any areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.</p> <p>Reason: In order to ensure a good quality of amenity and to secure appropriate features to conserve and enhance wildlife habitats and</p>

	<p>biodiversity measures within the development, in accordance with the requirements of policies A1, A3 and D1 of the Camden Local Plan 2017.</p>
<p>16</p>	<p>Living roofs</p> <p>The building shall incorporate no less 581sqm of green roof of which no less than 370sqm shall be intensive living roof with a substrate of 150-300mm.</p> <p>Prior to commencement of the building superstructure, full details in respect of the living roofs shall be submitted to and approved in writing by the local planning authority.</p> <p>Such details shall be incorporate the recommendations of the Preliminary Ecological Appraisal (Issue 2.0 10/11/20 by The Ecology Consultancy), including :</p> <ul style="list-style-type: none"> a. a specification which is be drawn up by a company with a proven track record in delivering these features in London; b. Any biodiverse green roof should support at least 25 plant species of value to wildlife; c. Consideration of combining biodiverse roof with photovoltaic panels (biosolar roof); and d. following UK standards (GRO, 2014) and include additional habitat features such as deadwood and varying substrate depths, habitat bricks, temporary pools and deadwood/log piles to provide habitat for a range of insects and birds including black redstart. <p>And shall also include:</p> <ul style="list-style-type: none"> e. a detailed maintenance strategy; f. details of construction and the materials used and sections at a scale of 1:20 showing substrate depth and where appropriate incorporating peaks and troughs to provide variations in habitat; and g. full planting details including species showing planting of at least 16 plugs per m2. <p>Prior to first occupation the living roofs shall be completed in accordance with the details thus approved and shall thereafter be maintained in accordance with the approved maintenance strategy.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3 and CC3 of the Camden Local Plan 2017.</p>
<p>17</p>	<p>LUL infrastructure protection</p> <p>Prior to the commencement of development, confirmation that agreement has been reached between the developer and London Underground on the</p>

	<p>detailed design and method statements for each stage of the development and demolition, shall be submitted to and approved in writing by the local planning authority.</p> <p>The detailed design and method statements shall address each stage of the development for demolition and shall:</p> <ol style="list-style-type: none"> a. Include details on all structures, including foundations, basement and ground floor structures and any other structures below ground level, including piling (temporary and permanent); b. demonstrate how the development accommodates the location of the existing London Underground structures and tunnels; c. accommodate ground movement arising from the construction thereof; and d. mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels. <p>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements.</p> <p>No part of the development shall be occupied until such time as all structures and works required by the agreed design and method statements are completed in their entirety.</p> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with policy T3 of the Local Plan 2017 and London Plan policy T3.</p>
<p>18</p>	<p>Basement engineer</p> <p>No development shall commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with a design which has been checked and approved by a building control body.</p> <p>Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development.</p> <p>Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.</p> <p>Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of Policies D1 and A5 of the London Borough of Camden Local Plan 2017.</p>
<p>19</p>	<p>Terraces hours of use</p>

	<p>The use of any roof terraces associated with the development shall not be carried out outside the following times :</p> <p>0730-2100 Mondays to Saturdays and 0830-2000 on Sundays and Bank Holidays.</p> <p>Reason: To safeguard the amenities of the nearest residential properties and the area generally in accordance with the requirements of policies G1, A1, A4 and TC2 of the London Borough of Camden Local Plan 2017.</p>
20	<p>Plant Noise</p> <p>The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:1997 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.</p> <p>Reason: To safeguard the amenities of neighbouring noise sensitive receptors in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
21	<p>No audible music played on terrace</p> <p>No music shall be played on the roof terraces in such a way as to be audible within any adjoining premises or on the adjoining highway.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, D1, A1, and A4 and TC1 and TC2 of the London Borough of Camden Local Plan 2017.</p>
22	<p>Vibration</p> <p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To ensure that the amenity of occupiers of the development / surrounding premises is not adversely affected by noise from mechanical installations/ equipment, in accordance with Policy A4 of the Camden Local Plan 2017.</p>
23	<p>Plant associated with Retail/Food & Drink uses</p> <p>Prior to commencement of any hot food cooking in the Class E (b) food & drink floorspace hereby approved, details of how the kitchen extract</p>

	<p>systems associated with the uses would be ducted to a high level, shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Such details shall also include details of the ventilation and filtration equipment to suppress and disperse fumes and/or smells created from cooking activities on the premises.</p> <p>No primary cooking shall take place within the relevant premises unless all such measures as approved have been installed and are in full working order.</p> <p>The equipment and any associated odour or noise mitigation measures shall be installed in accordance with the details thus approved and shall thereafter be maintained in accordance with the manufacturers' recommendations.</p> <p>In the event of no satisfactory ventilation being provided, no primary cooking shall take place in the relevant premises.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1, A4 and TC4 of the Camden Local Plan 2017.</p>
24	<p>Energy monitoring</p> <p>Prior to implementation, accurate and verified estimates of the 'be seen' energy performance indicators for the consented development, (see the 'Planning stage' chapter of the GLA 'Be seen' energy monitoring guidance document) shall be submitted to the GLA's monitoring portal in accordance with the 'Be seen' energy monitoring guidance.</p> <p>Prior to first occupation, updated accurate and verified estimates of the 'be seen' energy performance indicators for each reportable unit of the development (as per the methodology outlined in the 'As-built stage' of chapter of the GLA 'Be seen' guidance) shall be uploaded to the GLA's monitoring portal, alongside all data and supporting evidence. The submission shall also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators (as outlined in the 'In-use stage' chapter of the guidance document).</p> <p>Upon completion of the first year of occupation following the end of the defects liability period and for the following four years, the legal Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each reportable unit of the development as per the methodology outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document. All data and supporting evidence should be uploaded to the GLA's monitoring portal. This condition will be satisfied after the legal Owner has reported on all</p>

	<p>relevant indicators included in Chapter 5 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document for at least five years.</p> <p>Reason: In order to ensure that actual operational energy performance is minimised and demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan.</p>
<p>25</p>	<p>Circular Economy</p> <p>The development shall be designed and constructed in accordance with the Circular Economy Strategy as set out in Table 1 of Appendix 2 of the GLA Circular Economy Guidance table.</p> <p>Reason: In order to ensure resource conservation, waste reduction, increased material re-use and recycling, and reductions in waste going for disposal in accordance with circular economy principles in accordance with policies CC2 (Adapting to climate change) and CC5 (waste) of the London Borough of Camden Local Plan and Policy S17 (Reducing waste and supporting the circular economy) of the London Plan.</p>
<p>26</p>	<p>Whole of life carbon</p> <p>Prior to first occupation and following completion of the building (upon commencement of RIBA Stage 6), the post-construction Whole Life-Cycle Carbon (WLC) Assessment shall be submitted to the Greater London Authority (GLA) using the GLA's WLC assessment template in line with the criteria set out in the GLA's WLC Assessment Guidance and should be submitted along with any supporting evidence required by the guidance.</p> <p>Reason: In order to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards in accordance with policies CC1 (Climate change mitigation) and CC2 (adapting to climate change) of the London Borough of Camden Local Plan and Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan.</p>
<p>27</p>	<p>Mechanical Ventilation</p> <p>Prior to commencement of the superstructure, full details of the mechanical ventilation system including air inlet locations and a scheme of maintenance shall be submitted to and approved by the local planning authority in writing.</p> <p>Air inlet locations should be located away from busy roads and any other emission sources and as close to roof level as possible, to protect internal air quality.</p> <p>All such measures shall be put in place prior to first occupation of the development and shall thereafter be maintained in accordance with the approved details.</p>

	<p>Reason: To protect the amenity of occupiers in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy 7.14</p>
<p>28</p>	<p>Air Quality Monitoring (construction)</p> <p>Air quality monitoring should be implemented on site. No development shall take place until</p> <ul style="list-style-type: none"> a. prior to installing at least 2 monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance; and b. prior to commencement of development, evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date. <p>The monitors shall be retained and maintained on site for the duration of the works of demolition and construction, in accordance with the details thus approved.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.</p>
<p>29</p>	<p>Emergency generators</p> <p>Prior to commencement of the superstructure, details of the emergency generators shall be submitted to and approved by the Local Planning Authority in writing.</p> <p>Such details to include :</p> <ul style="list-style-type: none"> a. consideration of alternative low-NOx/renewable energy technologies and b. specification, type, emission details, location and exhaust mechanisms for the chosen plant. <p>Emergency plant and generators hereby permitted may be operated only for essential testing, except when required by an unplanned/unforeseen loss of power.</p> <p>Testing of emergency plant and generators hereby permitted may be carried out only for up to one hour in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.</p> <p>Noise emitted from any emergency plant and generators hereby permitted shall not increase the representative/typical assessed background noise level (expressed as the lowest 24 hour LA90, 15 mins) by more than 10 dB one metre outside any premises.</p>

	<p>The maintenance and cleaning of the equipment shall be undertaken in accordance with manufacturer's specifications.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.</p>
<p>30</p>	<p>Construction machinery</p> <p>All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the demolition and construction phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the demolition and construction phase of the development.</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Policies A1, A4 and CC4 of the Camden Local Plan 2017.</p>
<p>31</p>	<p>Sustainable Urban Drainage (SUDs)</p> <p>The development shall provide rain water storage in a blue roof with a minimum of 125 cubic metres of storage volume, collecting from a minimum catchment area of 1550sqm.</p> <p>Prior to commencement of the superstructure, full details of the sustainable drainage system for the building shall be submitted to and approved in writing by the local planning authority, including details to demonstrate:</p> <ul style="list-style-type: none"> a. System design to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water; b. Blue roof runoff rate of no more than 2.7litres/second; and c. A lifetime maintenance strategy. <p>All such systems as approved shall be installed prior to first occupation of the development, and thereafter retained and maintained in accordance with the approved maintenance strategy.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies</p>

<p>32</p>	<p>Rainwater Harvesting feasibility</p> <p>Prior to commencement of the superstructure, a feasibility study into providing a greywater harvesting system in the development shall be submitted to and approved in writing by the local planning authority.</p> <p>The study shall include evidence of detailed consideration of:</p> <ul style="list-style-type: none"> a. The design and cost of the system; b. cost savings for owner/occupier over a 10 -20 year period; c. projected grey water generation; d. projected demand for use of grey water; e. water savings as a result of the grey water system; f. a maintenance strategy; and g. payback for the system. <p>Where the study finds the system to be feasible, having had regard to the above considerations, it shall be installed prior to first occupation in accordance with the submitted details and it shall be retained thereafter and maintained in accordance with the approved maintenance strategy.</p> <p>Reason: To reduce the consumption of in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies.</p>
<p>33</p>	<p>Waste Water infrastructure</p> <p>Prior to first occupation of the development, details confirming that the developer has reached agreement with Thames Water (or the relevant statutory undertaker) on the waste water infrastructure needs of the development, shall be submitted to and approved in writing by the local planning authority. The confirmation details shall demonstrate that either</p> <ul style="list-style-type: none"> 1. Waste water infrastructure capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with Thames Water, or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed. <p>Where a development and infrastructure phasing plan is agreed under (2), the development shall not be occupied other than in accordance with the agreed development and infrastructure phasing plan.</p> <p>Reason: To ensure that the waste water infrastructure has sufficient capacity to cope with additional demand, in order to safeguard the</p>

	<p>amenities of the area generally, in accordance with the requirements of policies A1 (Managing the impact of development) and CC3 (Water and Flooding) of the Camden Local Plan 2017.</p>
<p>34</p>	<p>Surface Water infrastructure</p> <p>Prior to first occupation of the development, details confirming that the developer has reached agreement with Thames Water (or the relevant statutory undertaker) on the surface water infrastructure needs of the development, shall be submitted to and approved in writing by the local planning authority.</p> <p>The confirmation details shall demonstrate that either</p> <ol style="list-style-type: none"> 1. all surface water network upgrades required to accommodate the additional flows from the development have been completed; or 2. a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. <p>Where a development and infrastructure phasing plan is agreed under (2), the development shall not be occupied other than in accordance with the agreed development and infrastructure phasing plan.</p> <p>Reason: To ensure that the surface water infrastructure has sufficient capacity to cope with additional demand, in order to safeguard the amenities of the area generally, in accordance with the requirements of policy A1 (Managing the impact of development) and CC3 (Water and Flooding) of the Camden Local Plan 2017.</p>
<p>35</p>	<p>Piling Methodology</p> <p>No piling shall take place until details confirming that the developer has reached agreement with Thames Water (or the relevant statutory undertaker) on the piling method statement for the development, has been submitted to and approved in writing by the local planning authority.</p> <p>The piling method statement to be agreed shall detail the depth and type of piling to be undertaken, the equipment to be used, and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works.</p> <p>All piling carried out as part of the development must be undertaken in accordance with the terms of the agreed piling method statement.</p> <p>Reason: To safeguard the existing public sewer infrastructure, controlled waters and the structural stability of the neighbouring structures, in accordance with the requirements of policies A5 and CC3 of the Camden Local Plan 2017.</p>

<p>36</p>	<p>Contaminated Land</p> <p>Prior to commencement of the basement floor slab, a verification report demonstrating that the contamination remediation works set out in chapters 8 and 9 of the 'Geotechnical and Geo-environmental Interpretative Report Rev 0 October, 2020 by CGL' are complete, shall be submitted to approved in writing by the local planning authority.</p> <p>Any investigation and risk assessment must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11 / now LCRM). In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported in writing immediately to the local planning authority.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
<p>37</p>	<p>Waste and recycling</p> <p>Prior to commencement of the superstructure, details of the location, design and method of waste storage and removal including recycled materials, for each permitted use in the development, shall be submitted to and approved by the local planning authority in writing.</p> <p>Prior to first occupation of each permitted use, the relevant facilities shall be provided as approved and made available for use by the occupiers of the premises. The facilities shall thereafter be retained and the space shall not be used for any other purpose.</p> <p>Reason: In order to ensure adequate facilities are available and in order to support resource conservation, waste reduction, increased material re-use and recycling, and reductions in waste going for disposal in accordance with circular economy principles in accordance with policies CC2 (Adapting to climate change) and CC5 (waste) of the London Borough of Camden Local Plan and Policy S17 (Reducing waste and supporting the circular economy) of the London Plan.</p>

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Fire statement

No works shall commence to the building envelope/facades until a Fire Statement has been submitted to and approved in writing by the Local Planning Authority.

The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building.

The development shall not be implemented other than in accordance with the Fire Statement thus approved.

Reason: In order to provide a safe and secure development in accordance with policy D12 of the Publication London Plan 2020.

29. INFORMATIVES

Construction management

You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at <https://beta.camden.gov.uk/web/guest/construction-management-plans> or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.

CIL

This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice. Camden adopted new CIL rates in October 2020 which can be viewed at the above link.

The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation and construction methods

Works to LB Camden owned and managed tree are to take place by the council's term tree contractors only, contact should be made with the council's tree team via trees@camden.gov.uk.

Thames Water underground assets:

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other [structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes](https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes). Should you

require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development

Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.

You are reminded of the need to accord with the requirements of the Health & Safety Executive about the potential risk to future occupiers from exposure to radon gas in the basement.

All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)

Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.

This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, www.camden.gov.uk/planning or the Camden Contact Centre on Tel: 020 7974 4444 or email env.devcon@camden.gov.uk.

Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted.

Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

APPENDIX A: Consultation draft wording of relevant policies from Site Allocations Local Plan.

Policy KQ1: Supporting growth in the Knowledge Quarter Innovation District

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.

Development proposals for specific sites within the Knowledge Quarter Innovation District must also accord with any relevant individual site allocation. Development proposals on non-allocated sites within the area should contribute to the principles set out above where these are relevant to the development and commensurate with its nature and scale.

KQ1: Consultation responses to draft wording

7.1 During the public consultation on the draft wording a number of responses were received, including on behalf of the applicant, who raised concerns about aspects of the text. In particular it has been suggested that:

- *The use of the term 'must' in the opening paragraph should be amended to allow more flexibility,*
- *The requirement to collaborate with key stakeholders in the KQID when developing proposals needs clarification and details of how it would be assessed and measured*
- *It would be helpful to understand how the suitability of types of floorspace bring provided in the KQID would be monitored to ensure it captures the needs and future demand*
- *Provision of affordable workspace should be linked to uplift in floorspace and viability. Would support a payment-in lieu approach as an alternative where affordable workspace cannot be delivered as part of a development*
- *Parts d, e and f should be merged to a more general range of flexible workspace typologies*
- *Delivering innovation and knowledge floorspace is the key priority for the area, and therefore contributing towards new homes needs to be carefully balanced with other competing land use priorities and policy objectives*
- *Request for definition of 'Social Value Frameworks' and would welcome the opportunity to work with Camden on the detail*
- *Support for the need to demonstrate collaborative working with stakeholders, although further information as to what would exactly be expected would be useful*

7.2 Collectively officers consider that these comments amount to a request for more flexibility in the wording, but do not seek to undermine the strategic aims of the policy. The policy is supported by adopted Local Plan policy G1 (supporting text paras 2.49 and 2.52), H2 (supporting text para 3.61), E1 (policy wording and supporting paras 5.23, 5.33) and C2 (supporting text para 4.32).

Policy IDS1 – Network Building and 88 Whitfield Street

The Network Building and 88 Whitfield Street are allocated for office and retail led development that also retains and adds to existing permanent self-contained housing. Development must:

- a. Not harm the designated strategic view from Parliament Hill*
- b. Use entrances and windows to provide activity and visual interest on the Whitfield Street frontage*
- c. Respond to the smaller plot-sizes and building widths found in the wider Fitzrovia area*
- d. Remove the low plinth on the Whitfield Street and Howland Street facades*
- e. Respond to the priority given in Fitzrovia to creation of additional publicly accessible open space*
- f. Make the eastern end of Howland Street more pleasant for pedestrians*

The site is identified as having a capacity for 13 additional homes as part of an uplift in commercial floorspace.

IDS1: draft wording consultation responses

7.3 As with the text of KQ1, responses were received during the public consultation on the wording of this policy. Of particular relevance to this consideration, issues were raised with:

- It should be factored into the Allocation that the existing Network site may not be the most appropriate location to replace/relocate these units if development comes forward. These residential flats are better suited on the nearby site at 14-19 Tottenham Mews.
- Providing solely commercial use within the Network building and relocation of the residential on Tottenham Mews provides the most efficient and effective use of land
- Disagree that site could accommodate 13 additional homes
- Consider that there is more opportunity for public open space along the north section of Whitfield Street by developing ways in which street and the ground floor active street frontage interface.
- Some employment sites may not be appropriate for small businesses and are more suitable for buildings with larger floorplates for larger businesses. Policy should avoid prescribing location of affordable workspace and should allow for sites where it is best suited.

Officers consider that these comments seek more flexibility in the wording and in the manner that development of the site responds to wider policy considerations, but do not seek to undermine the strategic aims of the policy.

Policy IDS2: Former Tottenham Mews Day Hospital

The former Tottenham Mews Day Hospital site is allocated for a housing led development providing at least twelve permanent self-contained homes. Housing led development could also include an alternative small-scale community or healthcare use.

Development must:

- a) Provide a welcoming, spacious and safe pedestrian-cycling connection north-west from Tottenham Mews to join the east-west link from Chitty Street to Foley Street;*
- b) At street level, include windows that provide views into the buildings and out of them, to enhance community safety and visual interest along the Mews and the pedestrian-cycling routes;*
- c) At street level and above, respect the building line established by the adjacent housing block;*
- d) Respond to the scale, plot-sizes and building widths of buildings opposite the site in Tottenham Mews;*
- e) Respond to the priority given in Fitzrovia to creation of additional publicly accessible open space.*

The site is identified as having a capacity for 12 additional homes.

IDS2: draft wording consultation responses

7.4 Responses were received during the public consultation on the wording of this policy. Of particular relevance to this consideration, feedback was provided by the applicant and the Bloomsbury CAAC:

- Agree with the land use principles and believe that residential development is most appropriate for the site*
- Believe that site has capacity for up to 23 dwellings (dependant on housing mix).*
- Supportive of the principles and aspirations to enhance community safety, visual interest along the Mews and the pedestrian-cycling routes.*
- Agree that any new building on this site should respect its siting but believe “adopting a building line that matches the residential block currently under construction” is too prescriptive and should be judged when development comes forward.*
- Support the allocation of this site for housing*
- Strongly support Policy IDS2(c) respecting the roofline of adjacent buildings.*
- Would like to see materials, proportions, and solid-to-void ratios added to list of considerations in IDS2(d).*
- Suggest that planning obligations are secured to carry out enhancements to the historic environment of the mews, by reinstating historic street surfacing and lighting. Believe this would also help to achieve policy objective IDS2(b): improvement of community safety and visual interest.*

The feedback provides support for the proposed land use, and helpful feedback on design and capacity considerations. The feedback does not raise issues with the strategic aims of the policy.

Appendix B: Financial Viability Assessment Audit Report by BPS.