

Address:	105 - 121 Judd Street London WC1H 9NE		2
Application Number(s):	2022/1817/P	Officer: Patrick Marfleet	
Ward:	Bloomsbury		
Date Received:	19/04/2022		
<p>Proposal: Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services.</p>			
<p>Drawing Numbers: 4608-ST-07-GA-120, 4608-31-PL-208 A, 4608-31-PL-207 A, 4608-31-PL-206 A, 4608-31-PL-205 A, 4608-07-PR-204 B, 4608-07-PR-203 B, 4608-07-PR-202 B, 4608-07-PR-201 B, 4608-07-PR-302 A, 4608-07-PR-301 A, 4608-07-GA-106 A, 4608-07-GA-105 A, 4608-07-GA-104 A, 4608-07-GA-103 A, 4608-07-GA-102 A, 4608-07-GA-101 A, 4608-07-GA-100 A, 4608-07-GA-099 A, 4608-07-DM-105 A, 4608-07-DM-103 A, 4608-07-DM-102 A, 4608-07-DM-101 A, 4608-07-DM-100 A, 4608-07-DM-099 A, 4608-07-DM—204 A, 4608-07-DM-203 A, 4608-07-DM-202 A, 4608-07-DM-201 A, 4608-07-EX-304 A, 4608-07-EX-301 A, 4608-07-EX-204 A, 4608-07-EX-203 A, 4608-07-EX-202 A, 4608-07-EX-201 A, 4608-07-EX-105 A, 4608-07-EX-104 A, 4608-07-EX-103 A, 4608-07-EX-102 A, 4608-07-EX-101 A, 4608-07-EX-100 A, 4608-07-EX-100 A, 4608-07-EX-099 A, 4608-ST-EX-01-101 A, 4608-ST-EX-00-001 A</p>			
<p>Background Papers and Supporting Documents: Flood Risk Assessment & SUDS Strategy Parts 1-7, Phase 1 Land Contamination Report 11121-A2SI-XX-XX-RP-X-0001-00, Townscape, Heritage and Visual Impact Assessment March 2022, Air Quality Assessment 4th March 2022, Statement of Community Involvement April 2022, WLCA 13th April 2022, Energy Statement Parts 1-3 13th April 2022, Circular Economy Statement 13th April 2022, Preliminary Ecological Appraisal February 2022, Urban Greening Factor February 2022, Biodiversity Impact Assessment April 2022, Planning Statement April 2022, Operational Waste Management Strategy March 2022, Transport Statement March 2022, Sustainability Statement 13th April 2022, Structural Planning Report parts 1-9, Noise Assessment March 2022, Fire Statement 3rd March 2022, Draft Employment, Skills and Supply Plan, GIA Daylight & Sunlight Assessment parts 1-2, Gerald Eve cover letter 12th April 2022, Assessment of development proposals which would accord with BRE Daylight Guidance 28/07/2022.</p>			

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to section 106 legal agreement.

Applicant:	Agent:
105 Judd Street Limited 105 - 121 Judd Street London WC1H 9NE	Gerald Eve LLP 72 Welbeck Street London W1G 0AY

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	Class E - Office		7,026
Proposed	Class E - Office		8,898
	Total		8,898 (+1872)

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	0	0
Proposed	0	0

OFFICERS' REPORT

Reason for Referral to Committee: Major development involving the construction of a building or extension resulting in an increase of more than 500sqm of non-residential floor-space [clause 3(ii)].

EXECUTIVE SUMMARY:

The application site is located on the western side of Judd Street and relates to a four storey, plus basement, office building (Class E). The host building is not listed but is located in the Bloomsbury Conservation area and adjoins two terraces of Grade II listed buildings to the south on Judd Street and Thanet Street. The site is also located within the Central London Area and the Knowledge Quarter Innovation District.

The proposals include the retention and refurbishment of the host building along with alterations and extensions to the existing third floor level and the erection of a two storey roof extension (plus plant enclosure) to create a new fourth and fifth floor level at the site. The proposed works are all in association with the continued commercial use of the building (Class E) and will be designed to accommodate lab enabled space for life science uses.

The proposal has been through a thorough pre-application process, including review by the independent Design Review Panel, and is considered to represent a high quality design that respects the original character and proportions of the host building and preserves the character and appearance of the surrounding Bloomsbury Conservation Area.

The proposals would have an impact on the residential amenity of neighbouring residents, namely those living in Thanet House directly to the west and Jessel House to the east, particularly in terms of daylight and sunlight. However, these impacts are considered acceptable overall given the Central London location of the site and the retained daylight/sunlight levels, and are discussed in more detail in section 9 of the report.

In land use terms, the proposals are considered to satisfy a number of the Local Plan's economic and employment policies, which seek to locate office developments of this size in the Central London Area whilst also promoting development of the Knowledge Quarter growth sector. The proposals would bring forward a good package of employment benefits including the provision of affordable workspace, construction phase apprenticeships and end use work placements. A financial contribution towards affordable housing would also be secured.

The proposals are considered to represent a highly sustainable form of development, not least because they are seeking to retain and refurbish the existing building to bring it up to modern day office standards, which is the Council's preference for all sites where building reuse is a viable option. The proposed development would also improve the energy efficiency of the building through a variety of measures in order to achieve the BREEAM "Excellent" target the applicant is aiming for.

The proposed development is therefore considered to be acceptable in terms of the key considerations, namely: the principle of development / land use; design; neighbouring amenity; transport; waste and recycling; energy and sustainability; flood risk and drainage. The section 106 legal agreement will secure obligations to mitigate the impact of the proposal on neighbouring properties; the transport impacts of the scheme and sustainability impacts.

1 SITE

- 1.1 The application site relates to an existing four storey, plus basement, office building located on the north-western side of Judd Street, at its junction with Hastings Street. The property is a red brick Edwardian building which has frontages on to Judd Street to the east, Hastings Street to the north and Thanet Street to the west, and was constructed as a purpose-built office in two phases. The first phase was an L-shape section on Thanet Street and Hastings Street which was constructed between 1900-1910, whilst the second phase completed the Judd Street elevation and was built between 1922-1939.
- 1.2 The building was occupied by the Salvation Army from 1911 until 2000 and the Royal National Institute of Blind People (RNIB) from 2004 until present. However, the RNIB are now planning to move out of the building to a nearby site as part of their modernisation programme.
- 1.3 The site is located within the Central London Area, Knowledge Quarter Innovation District and the Bloomsbury Conservation Area. The building is not listed but is identified in the Bloomsbury Conservation Area Appraisal and Management Strategy (2011) as making a positive contribution to the character of this part of the conservation area.



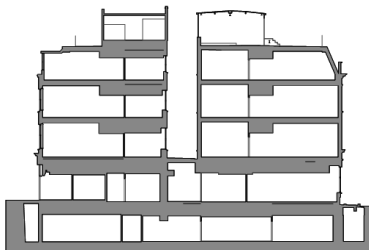
Street view south on Judd Street of existing building

- 1.4 The properties surrounding the site are predominantly Victorian and Edwardian red brick mansion blocks which are between 5 and 7 storeys in height. To the south, the site is bound by two terraces of residential properties on Judd Street and Thanet Street which are Grade II listed.

2 THE PROPOSAL

- 2.1 Planning permission is sought for the retention and refurbishment of the existing building including partial demolition and erection of set-back extensions at third floor level, as well as the erection of a two storey roof extension, plus plant enclosure, to create a new fourth and fifth floor at the site. The proposed extension(s) would provide additional office floorspace in connection with the continued commercial use of the building (Class E), and have been specifically designed and laid out to allow for lab enabled knowledge quarter uses to be accommodated at the site.

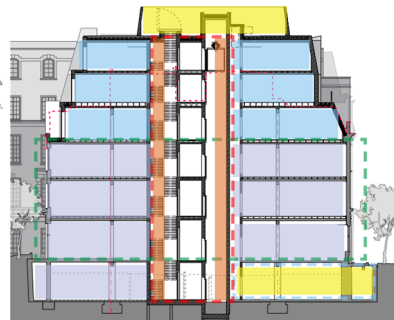
Existing section



Proposed section

LAB-ENABLEMENT DRIVERS - SECTION

- Efficient central core arrangement
- High ceiling heights for high level servicing strategy
- Primary Lab-enabled zones
- Primary Write up/ office spaces
- Increased riser provision for maximum tenant flexibility & future proofing
- Enhanced plant to afford Lab-enabled capability - basement, roof & potential on-floor plant where feasible



- 2.2 The proposals also include alterations at ground floor level such as the reconfiguration of the existing main entrance on Judd Street, installation of a platform lift, reinstatement of the original north eastern entrance and the inclusion of a café area which would be accessed via the main entrance to the building. Public realm improvements are also proposed along Judd Street and Thanet Street which include additional planting and paving upgrades as well as the widening of the pavement on Thanet Street to provide additional soft landscaping.
- 2.3 Roof terraces are proposed at third, fourth, and fifth floor level for use by the occupants of the building and will only be accessible during daytime hours Monday to Friday. A green roof is also proposed at main roof level, surrounding the proposed plant enclosure.
- 2.4 Approximately 102sqm of affordable workspace is proposed at lower ground floor level which would be secured at 50% discount of typical market rates for a period of 20 years.

3 RELEVANT HISTORY

The site

3.1 **2021/3922/P** - Temporary change of use of the Second and Third Floors of 105 Judd Street from Offices (Class E) to Education (Class F1) up until 31 January 2023. **Approved 11/10/2021.**

3.2 Pre-application

The current application has been shaped by a pre-application process which has involved meetings with planning officers and discussions between the applicant and Council officers. The early iteration proposals were also taken to Camden's Design Review Panel the feedback from which is discussed in the design section of the report assessment below.

4 CONSULTATION SUMMARY

4.1 The statutory consultation period ran from 04/05/2022 until 30/05/2022. Site notices were displayed around the site and a press notice was published in the local newspaper. Consultation responses were received from neighbouring residents and interested parties.

4.2 Consultation responses have been summarised below. They are presented in the following order:

- Statutory
- Local groups/stakeholders
- Individual responses

Statutory

4.3 **Historic England**

- The proposal would considerably and conspicuously increase the scale and absolute height of the building, with both sheer bookend extensions and an expressive mansard-type extension. Both would stress the building's relationship of character and appearance with the buildings to its north. A contrast in scale between Bloomsbury's Georgian townscape and the large buildings of Euston Road already exists in the vicinity of the site; but substantially increasing the size of historic buildings set within the Bloomsbury Conservation Area in order to accommodate demand for development could bring a lot of incremental change to its character and appearance such that it would risk cumulative harm to its significance. Our Historic Environment Good Practice Advice in Planning, 2: Managing Significance in Decision-Taking in the Historic Environment (2015) deals with cumulative harm (p.8) and local distinctiveness (p.15).
- We suggest that you continue to seek the views of your specialist conservation advisors, as relevant.

4.4 Thames Water

- No comment.

4.5 Transport for London

- The site of the proposed development is located less than 120 metres from the A501, Euston Road which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN, and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.
- The development is also under 400 metres from Upper Woburn Place, which forms part of the Strategic Road Network. TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.
- The footway and carriageway of the surrounding streets should not be blocked during the construction of the development. Temporary obstruction should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the surrounding roads, including cycleway 6 along Judd Street.
- TfL support the provision of no car parking in line with London Plan Policy T6 (Car Parking) and the Mayors Transport Strategy (MTS) 2018.
- The proposed cycle parking numbers are compliant with London Plan Policy T5 (Cycling) and TfL acknowledge and support the extra provision.
- With regards to the proposed public realm enhancements, the footway width on Hastings Street, Judd Street and Thanet Street, should all be in line with TfL's Streetscape Guidance.
- A full Construction Logistics Plan (CLP) should be provided to TfL. TfL request to see vehicle swept paths and details of the parking and loading arrangements for construction vehicles as well as any highway works proposed for construction. This is to determine if the CLP complies with London Plan policy.
- TfL are concerned with the routing of HGVs due to them turning over the Cycle Route 6. The CLP should assess the risk and mitigate it through training or provision of information, in the form of gold FORS and avoiding the local cycle peaks.
- If hoarding is proposed, the design should be of neutral design and colour scheme, as not to distract drivers or cyclists, or distress pedestrians using the pathway.
- The proposed trip generation of the site is acceptable.

Local groups and representatives

4.6 Bloomsbury Residents Association Group (BRAG)

- BRAG objects strongly to the above Planning application for the RNIB building. The addition of 2 storeys plus a roof plant is excessive, extremely visible in the public realm, intrusive to other listed buildings next door and

in and around Judd Street and completely out of keeping with its surroundings in this historical Conservation Area.

- Moreover, this application involves plans for unnecessary demolition rather than refurbishment, which goes against the Government's new Planning Guidelines, which now strongly favours 'Refurbishment' to demolition for obvious reasons.

4.7 Jessel House Residents Association

- The proposed development is not in keeping with the stylistic context of our neighbourhood. The brash glass extension proposed to the building clashes with all of the neighbouring buildings and is not suitable for a conservation area.
- The proposed upward extension will severely overlook the living and bed rooms of Jessel House immediately opposite across Judd Street (nearly all of the living and bed rooms of Jessel House are on the West side of the building).

4.8 Bloomsbury CAAC

- We would like to object to the above application on the grounds of causing unacceptable harm to the significance of the surrounding listed buildings and the Bloomsbury conservation area as a whole.
- The multiple additional storeys would exacerbate the buildings existing overbearing presence on the two storey terraces on Thanet Street and to a less extent the four storey terraces on Judd Street. To prevent damaging the setting of these listed buildings, a one storey set back extension might be acceptable.
- The increased massing of the roof makes the building look 'top heavy' detracting from the existing decorative dormers and turret. The mansard roof overwhelms the host building and makes no positive contribution. We believe that the proposed projecting dormer detail to the northeast and northwest elevations do not successfully reference the character of the existing dormers.
- The proposed roof terraces would also cause unacceptable overlooking of neighbouring properties.
- There are no public benefits that outweigh the harm caused to heritage assets and the application should therefore be refused.

Individual responses

Letters of objection

- 4.8 A total of 28 objections were received from neighbouring residents and interested parties, on the issues outlined below.

Consultation

- The developers claim in their Statement of Community Involvement that local properties were leafleted about the proposed plans. As a local resident, I can confirm that neither myself nor my neighbours received any such leaflet.

- As our property is next door to 105 Judd Street and we share the boundary wall, we understand that Camden Council has a legal obligation to inform and consult with us about the planned development of 105 Judd Street by Native Land. We have not received such a letter and wish to lodge our significant concerns that this has not happened.

Land use

- Developments of this scale should contribute to affordable housing in the area, yet these plans make no provision for this.
- This whole area is well provided with office space and new provision is being made all the time. This sort of speculative building should not be allowed in an area already over-provided with office space, especially at a time when fewer people are regularly working in centralised offices.
- Object to the idea of needing a community space and cafe. A small, independent cafe nearby has already been struggling since the lockdown, so to add another as competition will only make things more difficult for the owner and neighbouring businesses in the area.
- Locating life science facilities in a residential area endangers life and the environment.

Amenity

- Proposals will cause a significant loss of natural light and a deterioration in visual amenity, as well as overshadowing and loss of privacy to neighbouring residential properties on Judd Street and Thanet Street.
- The applicant's own Daylight and Sunlight Report concludes that of the 231 windows tested for VSC in Thanet House, 47% will not adhere to BRE guidelines for Vertical Sky Component.
- Proposed roof terrace will look directly into properties at Jessel House and will result in noise from social gatherings.
- Dust and debris caused by the proposed demolition and any other aspects of the refurbishment will have harmful impact on neighbouring residents and businesses.
- Noise from the construction works and the proposed plant equipment will cause unacceptable disturbance to neighbouring properties.
- Proposed increase in height would cause harmful loss of light to living room windows of properties directly facing the site on Thanet Street.
- Servicing will take place in Thanet Street. However, it is stated in the application that the incoming tenant is unknown therefore they do not know how many vehicles will be using our street and what hours. How can the Air Quality Assessment be accurate if this point is unknown? We hope servicing will be restricted by the Local Planning Authority.
- The daylight and sunlight report falsely states that the windows in Thanet House facing the site "typically serve bedrooms or very small kitchens". The window in Flat 157 is for a living room, and receives direct sunlight for many hours each day.
- Proposed extension would cause loss of light to neighbouring gardens immediately to the south.
- It is not clear how noise from the proposed terraces will be controlled or whether events will be held on them.

Transport

- We are concerned about the new layby and cycle access to Thanet Street and the impact this will have on disturbance through noise and traffic.
- It is noted that there is a servicing layby proposed on Thanet Street. We are concerned on the impact on noise from the positioning of this layby within close proximity to our properties. Information on servicing arrangements for the development have not been provided and we are concerned that this means we are unable to ascertain the exact impact that this arrangement will have on our properties.
- It is noted that the spaces along the north of Thanet Street alongside the building are to be removed. It is not clear how this would impact on parking demand in the immediate locality.

Design/Heritage

- Design of the extension will cause harm to the appearance of the conservation area.
- The proposed external changes and contrasting design of the roof extension would cause unacceptable harm to the historical integrity of the existing red brick Edwardian building.
- Object to the proposal to demolish 25% of the existing building in order to significantly increase its height and massing, which will cause harm to the Bloomsbury Conservation Area.
- The site is located close to the Grade II listed Camden Town Hall where there was an initial proposal to increase its height to provide additional floorspace, but in the end sense prevailed and these plans were abandoned. As a result, the building (including the roof) will have been repaired and refurbished to provide modern amenities but it will look much the same as when it was constructed in 1934. There is an opportunity to refurbish the building at 105 Judd Street in this same way without changing the historic roofline or causing harm to the Conservation Area.
- 105 Judd Street is adjacent to a row of listed Georgian houses. The addition of several extra floors will dwarf these houses and alter the street scape of this part of Judd Street.

5 POLICIES & GUIDANCE

5.1 National Planning Policy Framework (2021)

5.2 National First Homes Policy (Written Ministerial Statement May 2021)

5.3 NPPG

5.4 The London Plan (2021)

5.5 Mayor's Supplementary Planning Guidance

5.6 Camden Local Plan (2017)

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
- C5 Safety and security
- C6 Access for all
- A1 Managing the impact of development
- A3 Biodiversity
- A4 Noise and vibration
- D1 Design
- D2 Heritage
- E1 Economic development
- E2 Employment premises and sites
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

5.7 **Supplementary Planning Policies**

Camden Planning Guidance

- CPG Design
- CPG Housing
- CPG Employment sites and premises
- CPG Energy efficiency and adaptation
- CPG Amenity
- CPG Air Quality
- CPG Transport
- CPG Trees
- CPG Water and flooding
- CPG Developer contributions

Draft Site Allocations Plan 2020

Planning Statement on the Intermediate Housing Strategy and First Homes (March 2022)

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

ASSESSMENT

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

6	Land use
7	Design
8	Accessibility
9	Impact on neighbouring amenity
10	Land contamination
11	Air quality
12	Sustainable design and construction
13	Flood risk and drainage
14	Trees, landscaping and biodiversity
15	Transport
16	Safety and security
17	Refuse and recycling
18	Employment and training opportunities
19	Planning obligations
20	Mayor of London's Crossrail CIL
21	Camden CIL
22	Conclusion
23	Recommendations
	Legal comments
	Conditions and Informatives

6 LAND USE

Policy Context

6.1 Policy G1 of the Local Plan expects development to take place throughout the borough with the most accessible growth expected to be delivered through:

- The growth areas of King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road; and
- Other highly accessible locations, in particular Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead.

Proposed office space

6.2 Policy E1 of the Local Plan seeks to direct new office development to the growth areas mentioned above, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. The policy also seeks to support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross.

6.3 The application site is an existing office building (Class E) located within the Central London Area and the Knowledge Quarter Innovation District. The proposed development would deliver 1,872sqm GIA of additional office floorspace at the site and the entire building would be fitted out to accommodate Knowledge Quarter uses. As such, the proposed increase in office floorspace is considered acceptable and would be in accordance with Policy E1 of the Local Plan.

Affordable Workspace

6.4 Policy E2 of the Local Plan encourages the provision of employment premises and sites in the borough and will consider higher intensity redevelopment of premises or sites that are suitable for continued business use. This support for higher intensity employment premises is subject to ensuring the provision of suitable benefits for the people of Camden including: The provision of floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable and, securing increased employment opportunities for local residents, including training and apprenticeships.

6.5 The Council's supplementary guidance document *Employment Sites and Business Premises* offers further advice on how affordable workspace should be secured and sets out how the Council will seek to use planning obligations to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA or gross internal area). It also advises that the Council's Inclusive Economy Team will work with developers to agree appropriate terms of affordability on a case by case basis.

6.6 The proposed development includes the provision of 102sqm of affordable workspace at lower ground floor level which would be let at 50% of comparable market rates for a period of 20 years. The affordable workspace has been confined to the lower ground floor area for reasons of marketability, so the ground floor and floors above to have the potential to be let to one company.

Notwithstanding this, the lower ground floor still benefits from generous floor to ceiling heights and natural light. Furthermore, the applicant has confirmed that this area of the lower ground floor would be fitted out in a manner that would allow tenants to occupy the space at no additional cost to them. The affordable workspace offer has been discussed in conjunction with the Council's Inclusive Economy Team who are satisfied that the proposed 50% discount for 20 years would provide genuinely affordable workspace in the Central London Area. The affordable workspace would be secured as part of the associated s106 legal agreement and an affordable workspace plan would need to be submitted and approved prior to occupation of the space.

- 6.7 It is important to note that alongside the affordable workspace, the proposals also include a range of construction and end use apprenticeships/work placements which would provide employment and training opportunities to the people of Camden. These are discussed in more detail in section 18 of the report and would be secured as part of the s106 agreement.

Mixed use policy H2

- 6.8 Policy H2 of the Local Plan promotes a mix of uses in new developments, including a contribution to the supply of housing. In the Central London Area, where development involves additional floorspace of more than 200sqm (GIA), the Council requires 50% of the additional floorspace to be provided as self-contained housing. This is required to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Policy H4 (Maximising the supply of affordable housing) sets out when we will seek affordable housing, and the quantity and type of affordable housing we expect. Parts b) and g) of Policy H4 are particularly relevant to the current scheme, see extract below:

- 6.9 We will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more:

b) targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home;

g) where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;

- 6.10 The proposed development would result in an uplift of 1872sqm of office (Class E) floorspace which generates a requirement for 936sqm of the overall uplift to be provided as self-contained residential housing. Therefore, the mixed use requirement for this level of housing (less than 1,000sqm) would be for entirely market housing.

- 6.11 Policy H2 provides a set of criteria which will be considered when determining whether self-contained housing is required as part of a mix of uses. These include:

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

- b. site size, and any constraints on developing the site for a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. whether the development is publicly funded or serves a public purpose.

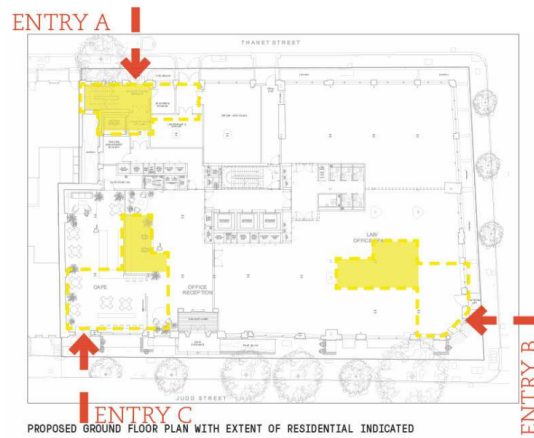
6.12 In support of the above criteria, Policy H2 states that where housing is required as part of a mix of uses, we will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

Residential study

6.13 During pre-application discussions the applicant produced a detailed residential study which explored the implications of providing a scheme with 50% residential provision (6 flats) and 25% residential provision (3 flats). The study identified that the provision of residential dwellings on site would result in the following outcomes:

- The proposal seeks to provide a flexible commercial building in the Knowledge Quarter and Central Activities Zone (CAZ) which can be adapted for future commercial tenants and would be one of the first knowledge quarter / lab enabled developments in the Knowledge Quarter to be undertaken by way of the refurbishment of an existing building. Residential provision would compromise the ability to do this and would result in a greater loss of building fabric to provide a separate residential core and potentially new floor slabs, which would reduce the sustainability credentials of the building.
- Provision of residential on the same floor slabs as the lab enabled facilities would potentially lead to issues such as contamination and vibration transfer.
- Given the constraints of the site the quality of the new housing would be poor. Flats would have no external space and would have an unusual shape given the configuration of the building which would result in poor outlook and light to the rear.

6.14 The matter of on-site housing provision was subject to considerable discussion, officers agreed that the only feasible location for the residential entrance to be provided was to the south eastern corner of the building (Entry C), as it would be adjacent to the existing residential terrace on Judd Street and least disruptive to the overall scheme. The applicant was asked to consider this option in more detail.



6.15 The applicants team drafted up two options for each on-site residential scenario (50% and 25% provision). In each case it was felt that the layouts required in order to accommodate either 2 flats at first, second and third floor level as part of the 50% provision, or 1 flat on each floor as part of the 25% provision, were suboptimal and also compromised the quality and flexibility of the proposed commercial space whilst also failing to provide a good standard of residential accommodation.

Layouts A and B for 50% provision



6.16 As can be seen above, both options for 50% provision would result in oversized 2 bed market flats (2 bed flats being noted as a higher priority in the local plan than 1 beds) which would be predominantly single aspect with at least two of the flats having a poor outlook onto the existing light well to the rear which would face the commercial windows directly opposite.

Layout for 25% provision



- 6.17 As can be seen above, the proposed layout for the 25% provision would again result in 3 oversized 2 bed market flats which would have their main living spaces looking out onto the rear light well and would not have any external amenity space.
- 6.18 Therefore, given the impact on-site residential provision would have on the quality and layout of the existing and proposed commercial space, the poor standard of private market flats it would deliver, the further demolition it would require and the potential issues of noise/vibration and contamination it could subject future residents to, officers are satisfied in this instance that it on site provision of residential accommodation would not be the optimal solution in this case.
- 6.19 The applicant does not have any land ownership interests in any other site close to the application site and so the provision of off-site housing is not considered feasible in this instance. The difficulty of finding additional sites to provide off site housing is also noted in the Housing CPG (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”*.

Payment in lieu of housing

- 6.20 Policy H2 states that where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council’s satisfaction that no appropriate site is available for housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation. For non-residential schemes such as this a rate of £1,500 per sq m GIA will generally apply to shortfalls in the provision of market or affordable housing. The applicant has agreed to make a payment in lieu (PIL) of self-contained housing being provided which will be secured as part of the s106 agreement. The total figure is **£1,404,000** and is calculated as follows:

Total addition to floorspace	1872sqm
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Self-contained housing floorspace target	1872 x 50% = 936sqm GIA
On site addition to self-contained housing floorspace	0sqm
Self-contained housing shortfall	936sqm GIA
Total payment in lieu of self-contained housing (shortfall GIA x £1500 psm)	936 x £1500 = £1,404,000

First homes

- 6.21 The national First Homes policy has now come into effect for developments that trigger an affordable housing contribution. First Homes are a new type of discount housing for sale. National policy indicates that First Homes should form 25% of the affordable housing sought in a development, and that where a payment in lieu (PIL) is sought in place of affordable housing, 25% of the value should be used to deliver First Homes. However, the Council has adopted a Planning Statement on the Intermediate Housing Strategy and First Homes, which indicates that First Homes in Camden would not be affordable to median income residents, and consequently First Homes will not be sought in the borough. Having regard to the national and local policies relating to First Homes, any funds arising from PIL and deferred affordable housing contributions are expected to contribute to the Council's preferred affordable housing types identified by Local Plan Policy H4 and CPG Housing 2021, namely social-affordable housing and intermediate rented housing.

Conclusion

- 6.22 Given the application site is an existing commercial building located within the CAZ and Knowledge Quarter Innovation District, the refurbishment and intensification of the existing office use is considered appropriate in this location, and the development would contribute towards a successful and inclusive economy. Although no on-site housing is provided in this instance for reasons of feasibility, a financial contribution towards self-contained housing is proposed. Therefore, on this basis, and given the other public benefits arising from the scheme including the provision of affordable workspace, the development is considered to accord with the Camden Local Plan and the London Plan and is acceptable in land use terms.

7 DESIGN & HERITAGE

- 7.1 Local Plan Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area. Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Pre-application and DRP

7.2 The proposals were presented to the Camden Design Review Panel (DRP) twice, a summary of the Panel's comments is provided below:

Meeting 1 – 08/10/2021



- The panel supports the conversion proposed for 105 Judd Street and believes additional height can be successfully added, but considers that the design approach to the proposed roof extensions requires further development to ensure the proposals deliver the highest possible quality building.
- The panel feels that the addition of brick and stone elements that rise above the current roofline add unnecessary weight and visual clutter. This has resulted in extra storeys of brick rising above the smaller street, which adds inappropriate massing. The panel considers that brickwork above the existing roofline should be reduced, and that it should be expressed in a more delicate way that breaks down rather than emphasises scale.
- Staff amenity space, including terraces, should be sufficient to cater for the number of people expected to work in the building and should be designed for amenity use as well as greening.
- It is important to consider all options for residential units as well as commercial space. This area of Bloomsbury is characterised by the combination of commercial and residential uses and this mix should be strengthened unless in exceptional circumstances.
- The panel supports the proposals to activate the frontages around the building. Ground floor improvements are focused on Judd Street but the panel encourages the design team to give further consideration to how the building can improve its other frontages. The project should aim to introduce public realm improvements on Hastings Street and Thanet Street.
- The panel feels that the south-west corner elevation on Thanet Street adds excessive bulk in relation to adjoining houses. The corner should be reduced in height.

Meeting 2 – 11/02/2022



- The panel considers that significant positive progress has been made since the previous review and the proposed designs, subject to some further development have the potential to result in a high quality building.
- The panel thinks that the revised roofline is a success. The shaped, decorative dormer windows work well to give definition to the top of the building.
- The panel considers that lowering the building at the north-west and south-west corners is a considerable improvement. However, the dormer level corner ‘bookend’ elements at the north-west and south-west corners are still too heavy. Work should be done to lighten them by introducing more subtle variation or by adding recess details between pairs of windows.
- The panel also supports the reduction in mass and the design of the rooftop plant enclosure, specifically the way it echoes the peaked dormer window forms below.
- The landscape and streetscape designs are progressing well. The panel is encouraged by the design team’s commitment to addressing local concerns over anti-social behaviour by providing as much animation and surveillance at street as possible, including on Thanet Street.

Assessment of the submitted proposals

- 7.3 The following section of the report sets out an appraisal of the existing building’s townscape value followed by the officers’ assessment of the success of the scheme in responding to Camden’s design policies and the requirement to preserve or enhance the character and appearance of the conservation area and the setting of nearby listed buildings.

Policy Background

- 7.4 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“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 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 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) is relevant. 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.

7.6 The effect of this section of the Act is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas. Considerable importance and weight should be attached to their preservation. Should the Council define ‘harm’ it would only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the harm. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 16).

7.7 NPPF section 16 paras. 199 to 202 in particular, NPPG section 18a, London Plan policies 7.1 to 7.7, Camden Local Plan policies D1 and D2 and CPG (Design) are relevant with regards to design and conservation. The overarching aims of these policies are to secure high quality design that will preserve and where appropriate enhance heritage assets and their setting.

7.8 Paragraph 203 further recognises the importance of non-designated heritage assets, stating that:

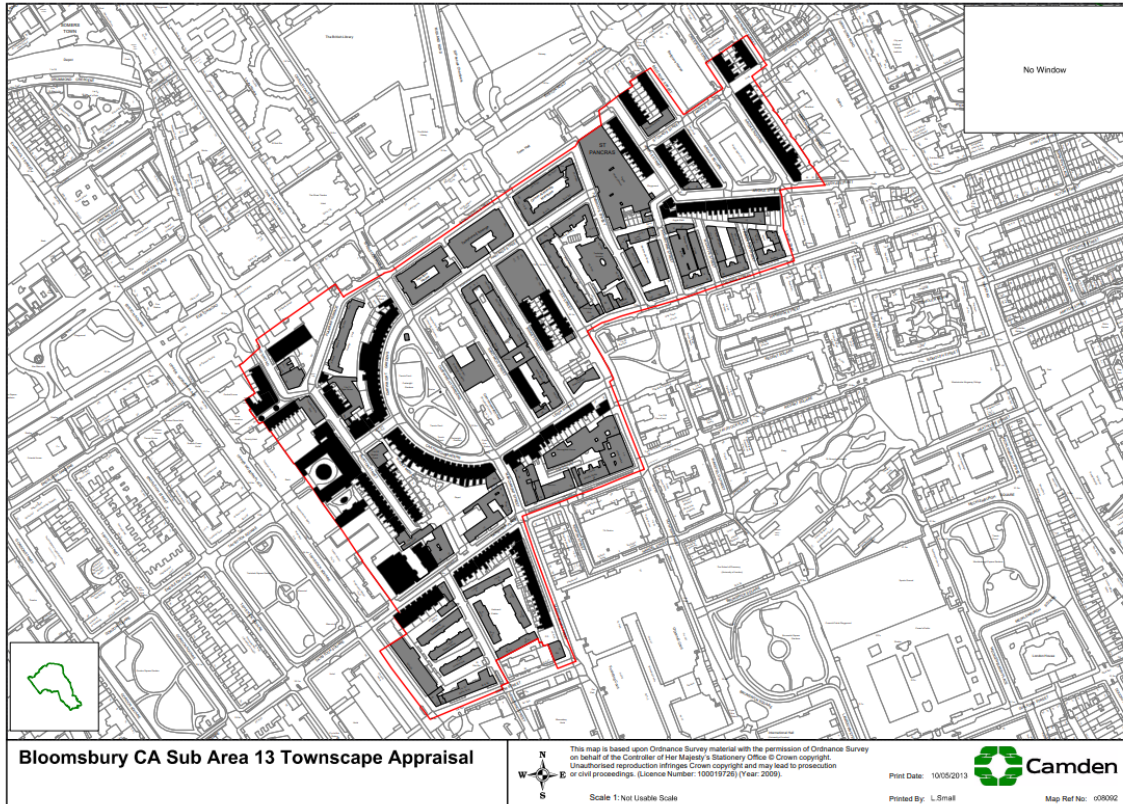
‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’

Heritage appraisal

7.9 The application site is located within Sub Area 13 (Cartwright Gardens/Argyle Square) of the Bloomsbury Conservation Area. The conservation area appraisal notes that the interest of the sub area derives from the formal 19th Century street pattern and layout of open spaces, and the relatively intact surviving terraces of houses. However, the sub area also comprises a tranche of relatively consistent later development stretching from Mabledon Place in the west to Loxham Street in east. These later developments include a large number of mansion blocks flats and commercial buildings from the turn of the 20th Century which range from 4 to 8 storeys in height.

7.10 The appraisal goes on to describe the application site (105-121 Judd Street) as a red brick Edwardian building with a turret at the junction with Hastings Street. It describes the three/four-storey building as being of a larger, commercial scale, occupying the depth of the Judd Street and Thanet Street blocks, and therefore has a strong relationship with the former telephone exchange to the north. The appraisal also notes that further south, flanking the southern end is a three storey terrace of Grade II listed townhouses.

7.11 The map of the sub area below clearly shows this juxtaposition where low level 19th Century terraces are generally located to the east and west whilst the centre of the sub area, where the application site is located, is characterised by larger 20th century mansion block and commercial buildings.



Impact on the significance of the host building

7.12 105-121 Judd Street is identified in the Bloomsbury Conservation Area Appraisal as making a positive contribution to the character of the surrounding conservation area. The building has a strong physical presence within the street scene, reinforced by the square-pyramidal spire that occupies the corner roof area, and the baroque-inspired detailing and dormer windows at third floor. That said the building, is considered to have the slight air of appearing unfinished and the latter mansard floor that has been added add third floor level is underwhelming and of low design quality.

7.13 The proposed extensions work to complement the character of the local environment, with a massing that reflects the typical scale of development and using details and materials that are found commonly within the area. The visibility and prominence of the existing turret on the corner of Judd Street and Hastings Street is maintained, with the proposed massing of the extensions carved away on this corner to preserve the silhouetted view. Furthermore, whilst the proposals would result in the part loss of the existing third floor, this would be largely limited to existing mansard and dormer windows at this level which aren't considered to be particularly high quality or important in terms of their contribution to the overall appearance of the building.

7.14 Given the above, officers note that the proposed development would add a noticeable amount of additional height to the building. However, the high quality design and proportions of the extensions, which respond to the varying contexts of the site, are considered to create an architectural composition that enhances the form and features of the building which are integral to its status as a positive contributor, rather than harm them. Furthermore, the proposed roof extension is considered to complete the building at upper floor level which is something officers feel is currently missing from the existing arrangement. In doing so, the proposed extensions are considered to reinforce the grand size, scale and presence of the building and are an example of how modern design interventions can enhance the appearance of a historic building and ensure it continues to make a positive contribution to its surroundings.

Impact on the conservation area

7.15 Officers note the concerns raised by local groups and neighbouring residents with regard to the impact the proposed increased height of the building would have on the character and appearance of the surrounding conservation area. Historic England, whilst not objecting to the proposals, did also comment on the incremental change that could be brought about as a result of the demand to accommodate further development of this kind to surrounding buildings in the area.

7.16 However, as mentioned earlier in this section of the report, the application site is considered to represent a transitional site in this particular part of the conservation area where the low level Georgian Terraces are replaced by large commercial and mansion block buildings which vary between 5 and 7 storeys in height. As such, the erection of two additional storeys at the site, which would create a six storey building overall, is considered to represent a proportionate form of development that would sit comfortably within its setting. Therefore, whilst the proposed extensions would be seen in short and longer range views from the public realm, particularly along Judd Street and Thanet Street, they are considered to blend in with the surrounding townscape and make a positive contribution to the appearance of the host building and wider area.

7.17 Furthermore, the design of the proposed extensions pays careful reference to the historic character and detailing of the existing building by drawing out the features that contribute to the buildings significance and reinterpreting them in a contemporary fashion, which is considered to enhance rather than harm the character of the surrounding conservation area.

Impact on nearby listed buildings

7.18 Officers note the concerns of the Bloomsbury CAAC with regard to the overbearing impact the proposed extension would have on the setting of the adjoining Grade II listed terraces to the south, particularly the two storey properties on Thanet Street. As noted earlier in this section of the report, the site is characterised by smaller scale terraces in close juxtaposition with Edwardian and later development of a much greater and bulkier scale. This proposal continues that relationship and is therefore in keeping with the existing character of sub area 13. However, as can be seen on the images below, the existing four story brick 'bookend' of the host building, which faces Thanet Street and adjoins the terrace immediately to the south, would remain unchanged by the proposals ensuring this existing relationship

between the two buildings in closer range views at least, is maintained and any visible added height would therefore appear recessed as a background element.

Existing



Proposed



- 7.19 Additionally, the proposed roof extensions have been purposely set back on the southern side in order to provide further relief to the neighbouring terraces of residential properties. The mansard style sloping roof design also helps to further soften this impact to these properties. As such, the size, scale, design and set back of the proposed extensions are considered to represent carefully formed and sympathetic additions that would maintain rather than harmfully exacerbate the existing difference in heights between the host and neighbouring buildings.

Proposed height, scale and massing

- 7.20 The site is a four storey group of buildings plus basement which is bounded by Hastings Street to the north, Judd Street to the east, Thanet Street to the west. The existing condition has a principal elevation to Judd Street and the first portion of Hastings Street, with more humble elevations to Hastings and Thanet Street. The prominent bay on Judd Street accentuates the main entrance and the feature turret at the corner of Judd Street and Hastings Street performs a useful townscape role in creating a focal point.

- 7.21 The wider setting is predominantly Victorian and Edwardian red brick mansion blocks which are between 5 and 7 storeys in height. In this context the proposal for 6 storeys with an additional set back floor of plant above is deemed an acceptable response to the general size and proportions of the buildings surrounding the site. The design has responded to the varying existing conditions found on each of the 3 streets and to the existing terraces and gardens to the south. The use of set-back massing and a mansard arrangement reduces the potential impact on the street and neighbouring buildings whilst allowing the proposal to have a character that is derived from the existing building.

Detailed design

- 7.22 The majority of visible alterations to the existing buildings are through additions at the upper levels. These have been carefully designed to respond to the existing facades and neighbouring buildings, with features that incorporate references to the existing context.

- 7.23 On the east façade facing Judd Street, the existing 3rd floor dormer windows are retained and a new line of dormer windows proposed above that extend across the 4th and 5th floors. This articulation of the new upper façade achieves rhythm and crenellation to the sky that reference the existing windows. On the north façade facing Hastings Street, this language is extended to reference the existing dormer windows found here. On the north west corner the existing 2nd floor eaves level is

raised by a floor to strengthen the street corner and respond to the height of the corner on Sinclair House to the west side of Thanet Street. This extension will be in brick and with details to match the existing façade beneath.

- 7.24 On the west façade facing Thanet Street the proposal removes the existing dormer windows and pitched roof with the new extension formed in terraces that step back from the building line to mitigate impact to the street. The form is broken by a series of brick piers that respond to the brickwork and massing found in the façade of Sinclair House on the opposite side of the street. The new 3rd floor is clad in matching brick to provide a continuous datum around the building with hung-tile clad elevations above. On the south, facing the lower residential terraces and gardens, the proposal has sensitively set away from the boundary to reduce impact to these properties and street based views from the south. The existing lightwell within the buildings has been carried through to the rooftop extensions that assists with the proposal settling in to the general grain and urban scale of the context.
- 7.25 A plant enclosure is located above the proposed roof extensions at 6th floor level. The location and general scale of this is necessary for the proposed use, with the full extents of the equipment enclosed within an elegant bespoke screen that has been designed to extend the façade design from the floors below. The positioning on the roofscape has been considered so that it minimises any visibility within views from street level. The screening is broken up both with materials and form so that it carries a rhythm similar to the dormer windows found beneath.
- 7.26 The materials proposed include a palette of those found locally and complemented with modern interpretations where necessary. The dominant red brick is included on lower parts of the extension. This transitions into a hung brick tile on the taller sections to achieve a roof-like appearance to these elements. Areas of metalwork are given a visual richness with simple patterned ornamentation that is derived from the existing corner turret.

Sustainability in design and construction

- 7.27 The primary sustainability benefit of the scheme is the proposed retrofit and extension approach to adapting the building. The retention of 75% of the existing structure ensures a minimisation of embodied carbon. Furthermore, the new steel frame aligns with the existing structure, with the main extent of demolition limited to roof level. An approach to a circular economy with consideration for future use and standardised sizes considers the long term adaptability of the building. As an all electrical development boilers and CHP plant are omitted to align with the continuing decarbonisation of the grid. The extension floors include a glazing ratio (window-to-wall) of approximately 28% to minimise solar overheating potential whilst optimising natural daylight, thus reducing cooling demand. This is discussed further in section 12 below.

Conclusion

- 7.28 The overall size, scale and design of the proposed extension is considered to represent a high quality development that would respect the original character and proportions of the host building and its surrounding context whilst providing a contextual and sympathetic contemporary extension above it. The proposals are therefore considered to preserve and enhance the character and appearance of the

surrounding conservation area, in accordance with policies D1 and D2 of the Local Plan.

8 ACCESSIBILITY

- 8.1 Policy C6 of the Local Plan seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.
- 8.2 The proposal provides an increased permeability of the ground floor with a reactivated street frontage, whilst main level access is provided from Judd Street including a publicly accessible café within the reception area of the proposed development. The secondary entrances from Thanet Street are also provided step-free with the level difference between entrances on the ground floor resolved with internal ramps. Internal circulation is provided to conform with modern standards including new lifts to access all floors.
- 8.3 Given the above, the proposed development is considered acceptable with regards to accessibility and would comply with Policy C6.

IMPACT ON NEIGHBOURING AMENITY

Relevant policies

- 8.4 Policies A1 and A4 of the Local Plan seek to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents which includes loss of daylight and sunlight, outlook, privacy and noise.

Daylight, Sunlight and Outlook

- 8.5 A Daylight and Sunlight Report by GIA has been provided with the application documents. The report assesses sunlight and daylight against the guidelines set out in the BRE Report "Site layout planning for daylight and sunlight - A guide to good practice 2022" (hereafter referred to as the BRE guidance). The BRE guidance states that if the Vertical Sky Component (VSC) at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. reduction of more than 20%), the reduction in skylight will be noticeable and the building may be adversely affected. This is not to say that a transgression of more than 0.8 would cause unacceptable harm to neighbouring amenity and a degree of flexibility needs to be taken when applying this guidance.
- 8.6 With regard to No-Sky Line (NSL), the guidance states that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. reduction of no more than 20%).
- 8.7 The report assesses the impact on the following properties:
- 97 Judd Street
 - 99 Judd Street
 - 101 Judd Street
 - 103 Judd Street

- 114 Judd Street
- 14 Thanet Street
- 15 Thanet Street
- 16 Thanet Street
- 17 Thanet Street
- Queen Alexandra Mansions
- Thanet House
- Jessel House

8.8 The following properties would all comply with the numerical criteria stated above and would not experience reductions to VSC and NSL which would exceed the 20% threshold.

- 97 Judd Street
- 99 Judd Street
- 101 Judd Street
- 103 Judd Street
- 114 Judd Street
- 14 Thanet Street
- 15 Thanet Street
- 16 Thanet Street
- 17 Thanet Street
- Queen Alexandra Mansions

8.9 The impacts of the proposed development on the two remaining properties are discussed below:

Thanet House

8.10 With regards to Thanet House, a 6-storey residential mansion block opposite the development, of the 231 windows tested, 122 would continue to adhere to the BRE guidance for VSC, which is to say that the windows would maintain a value of at least 27% or would not experience a loss of more than 20%.

8.11 Of the 109 windows that do not meet the BRE VSC criteria, 103 will experience an alteration of between 20% and 30%, which is typically considered to be a minor adverse impact, and six will experience an alteration of between 30% and 40%, which is considered to be a moderate adverse impact. It is also important to note that 15 of these windows will only experience a percentage alteration of between 20.1% and 21%, which only marginally exceeds the 20% threshold of the BRE guidance.

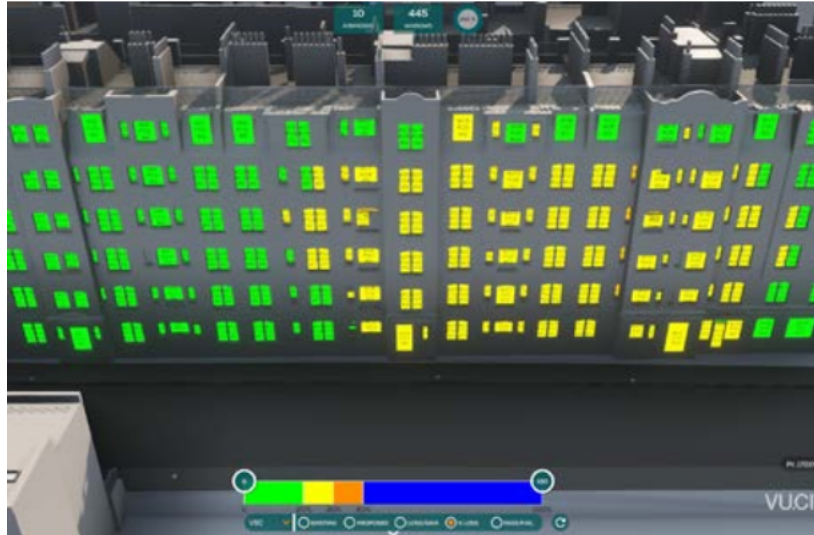


Figure 29: VSC % Loss

- 8.12 In dense urban locations such as this where properties are located in such close proximity to each other, it is common for a lower, more realistic benchmark to be used when assessing VSC impacts. As has been shown in the contextual analysis provided within the GIA report, on similar sized developments in the borough which have similar impacts on neighbouring daylight, a target value in the mid-teens is used as an alternative to the 27% BRE target. Examples of these developments include the Royal Nose, Ear and Throat Hospital at 330 Gray's Inn Road; St Pancras Commercial Centre in Camden Town and Belgrove House opposite Kings Cross Station.
- 8.13 Therefore, whilst officers note that there would be VSC transgressions as noted above, these impacts are considered to be minor or moderately adverse. The majority of the living room windows affected at Thanet House would largely maintain VSC levels of 15% and above which is considered to be acceptable in the context of similar sized applications approved in the borough and given the constrained Central London location of the site. Where there are transgressions that retain lower values than 15%, these would generally be limited to a small number of windows on the ground floor of the building which already experience light levels well below the 27% VSC target. Therefore, whilst they would experience further impacts, the reductions are close to the 20% threshold stated in the BRE guidance and so the impact in absolute terms is not considered to be significant.
- 8.14 Officers note the concerns raised by neighbours regarding the assertions made in GIA's executive summary about the types of rooms at Thanet House that would be affected by the proposals (mainly bedrooms and small kitchens). The comments from residents have made clear that some of the rooms affected by the proposals would be main living room spaces which officers acknowledge. However, the VSC results tables included in GIA's report do include the room types for each window affected and whilst a lot of those windows do serve kitchens and bedrooms, which are considered less sensitive in daylight terms, it is clear that there are several windows which do serve main living room spaces.
- 8.15 The impacts on these windows varies as you move up the building with windows on the lower floors, which generally already have existing VSC values below 27%,

experiencing slightly lower losses than those on the upper floors of the building which benefit from increased daylight levels and largely have VSC values of 27% and above. Therefore, whilst the proposed extension would result in reductions to the daylight reaching windows on the eastern elevation of Thanet House, these reductions are considered to be within the limits of acceptability for a scheme such as this in an historic urban street-plan context where distances between buildings are often lower than 18 metres.

Jessel House

- 8.16 The VSC results demonstrate that the majority of properties at Jessel House would maintain VSC readings of above 27%. Where there are reductions these would not exceed 20% of the former value. The proposed development is therefore considered compliant in VSC terms.
- 8.17 With regards to NSL, of the 80 windows tested, 65 would be fully compliant with BRE guidelines. Of the 15 rooms that do not meet the criteria, 9 would experience a loss of between 20-30% and 6 would experience a loss of between 30-40%. These windows are located in the centre of the building and highlighted in yellow/orange on the image below.

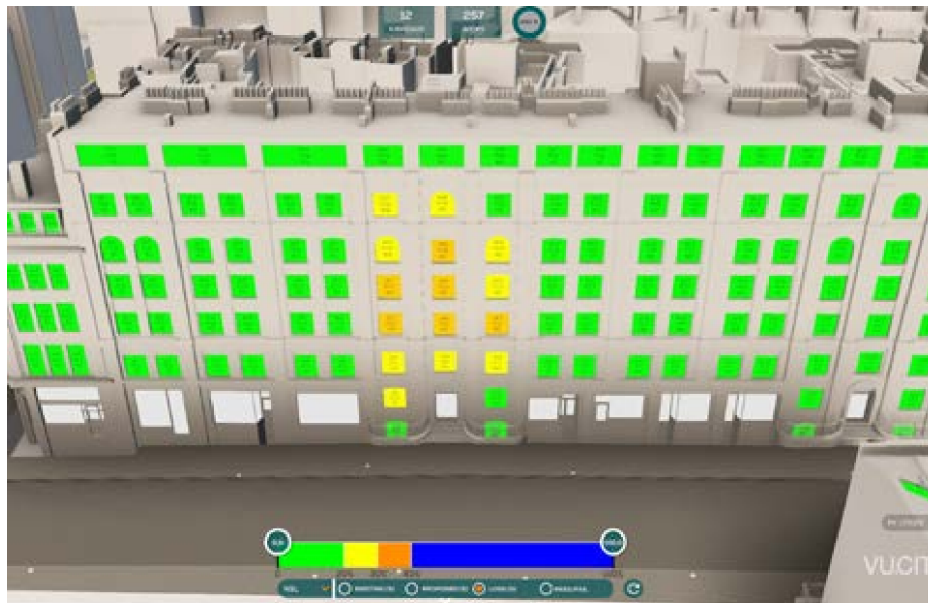
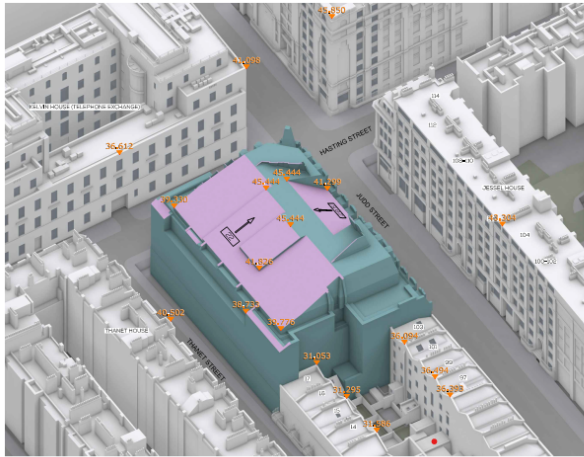


Figure 31: NSL % Loss

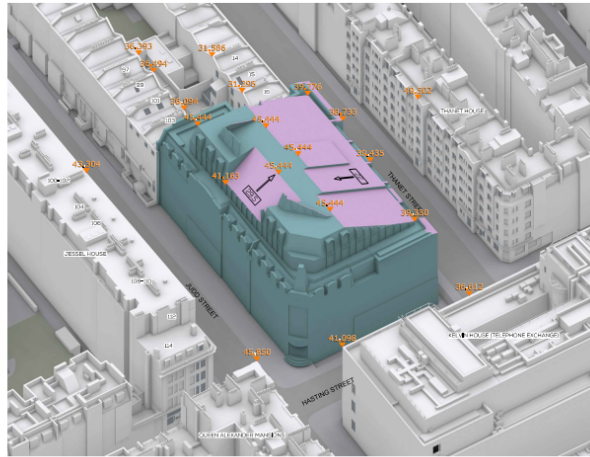
- 8.18 Therefore, whilst there would be some NSL transgressions to a small number of windows in the centre of the building, these impacts are considered acceptable on balance as all windows would maintain compliant VSC and APSH (Annual Probable Sunlight Hours) values.
- 8.19 It is important to note that the BRE guidance was amended in June 2022 (after submission of the current application). However, in terms of the assessments outlined within the guidelines for external assessments, i.e. methodologies undertaken to consider neighbouring buildings, these remain consistent with the superseded 2011 BRE Guidelines and therefore there is no change to how we assess the impacts.

Assessment of a development that would be fully compliant with BRE guidance

8.20 As part of their submission, the applicant has provided a massing study which demonstrates the maximum additional bulk that could be accommodated at the site which would fully accord with the BRE daylight/sunlight guidance. See images below which have been prepared by GIA.



Day Light Model View from the South West



Day Light Model View from the North East

8.21 The above images show the massing of the proposed development and in pink/purple, the areas where this would need to be cut back to ensure that the scheme would be fully compliant with BRE daylight guidance. This would result in the loss of part of the proposed fourth floor, the majority of the fifth floor and the entire plant enclosure above that which would be a floorspace reduction of about 830sqm. Clearly this would impact severely on the deliverability of a scheme which seeks to adapt an existing historic building for modern purposes and accommodate the additional floorspace to make it viable as well as the space-hungry plant and other operational requirements.

8.22 Therefore, officers consider this study to be useful in demonstrating the constraints full BRE compliance would have on development in the Central London Area/ Knowledge Quarter District, where new development sites are limited and the majority of development opportunities are likely to come from the adaptation and extension of existing buildings.

Outlook and overlooking

8.23 The proposals include a roof terrace area on the western elevation at third floor level and a roof terrace surrounding the perimeter of the newly created fourth floor. Several concerns have been raised from neighbouring residents with regards to the impact of the proposed roof terrace.

8.24 Officers note the concerns that have been raised from neighbouring residents with regard to the impact the proposed terraces would have on their amenity in terms of increased overlooking.

8.25 However, the distance between the fourth floor terrace area and the neighbouring residential block (Thanet House) directly to the west is approximately 15 metres. Therefore, this distance coupled with the height and location of the terrace would ensure only relatively oblique views would be allowed to the windows of the

neighbouring property opposite which are not considered to cause harmful levels of overlooking. Furthermore, the western side is the narrowest part of the terrace, and therefore people are unlikely to congregate in significant numbers which further limits the impact.

- 8.26 Similarly on the eastern side of the terrace facing Jessel House, the distance between the terrace and the neighbouring windows would be 18m which is considered a sufficient distance to ensure no harmful levels of overlooking would occur, particularly as the relationship in terms of mutual overlooking between this terrace and the windows opposite simply continues that of all the existing windows on the building below.
- 8.27 The largest parts of the terrace are located to the north, which faces an existing commercial building, and a small section to the south east corner close to the adjoining properties on Judd Street. However, the height and location of the area to the south, coupled with its set in from the edge of the roof would ensure no harm is caused to these neighbouring properties with regards to loss of privacy.

Noise and disturbance

- 8.28 Officers note the concerns from local residents with regards to the increased noise and disturbance that would occur as a result of the proposed plant equipment and roof terraces.
- 8.29 The Council's environmental health officer has reviewed the submitted noise report and confirmed compliance with the Council's noise standards with regard to the proposed plant to be installed on the roof. The on-going compliance with these standards will be secured by condition.
- 8.30 In order to mitigate any noise impact to neighbouring residents from the proposed roof terraces, a condition has been added to the decision notice which restricts the hours in which they can be accessed from 08:00 to 20:00 Monday to Friday. A condition has also been added which restricts any music emanating from the site being audible to neighbouring properties and streets.

Conclusion

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

9 LAND CONTAMINATION

- 9.1 The application is accompanied by a Phase 1 site investigation report, which has been reviewed by the Council's land contamination officer who has confirmed the assessment is acceptable, and the risk to end users from exposure to potentially contaminated soils is considered to be low.
- 9.2 Notwithstanding this the report recommends a Phase II site investigation. This should include a ground gas risk assessment given the Low to Moderate gas risk identified for the site (associated with made ground from former development on the site), along with soil sampling and testing for the contaminants of concern identified within the desk study report. These details will be secured by condition.
- 9.3 As such, the proposed development is considered acceptable with regards to land contamination.

10 AIR QUALITY

- 10.1 Camden Local Plan policy CC4 is relevant with regards to air quality and seeks to ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.
- 10.2 The applicant has submitted a detailed Air Quality Assessment (AQA) with the application which includes an assessment of the proposed developments impact on air quality during the construction and operational phases, as well as an Air Quality Neutral Assessment.

Construction Impacts

- 10.3 Overall, the Dust Risk Assessment identifies the site as having a medium risk of causing impacts during demolition works, and mitigation measures consistent with a medium-risk site should therefore be implemented in order to ensure the impact of the construction phase would not be significant. These measures will be secured by condition and as part of the s106 legal agreement.

Table 5-3. Impact Description of Construction Activities without Mitigation

Source	Summary Risk of Impacts Prior to Mitigation		
	Dust Soiling	Health Effects of PM ₁₀	Ecological
Demolition	Medium	Negligible	N/A
Earthworks	N/A	N/A	N/A
Construction	Low	Negligible	N/A
Trackout	Low	Negligible	N/A

Operational Phase

- 10.4 The air quality assessment considers the operational phase of the proposed development and the impacts on local air quality due to emissions from vehicular traffic associated with the operation of the site. The proposal does not include any on or off street parking and would be secured as car free as part of the s106 agreement.

However, there is likely to be increased delivery and servicing vehicles travelling to the site as a result of the works.

- 10.5 The submitted Air Quality Neutral Assessment (AQNA) demonstrates that the transport emission associated with the development for NO_x and PM₁₀ would be below the benchmark emissions for these categories and are thus considered acceptable. See tables 7.7 and 7.8 below.

Table 7-7. Calculation of Benchmarked NO_x emissions Using Transport Emissions Benchmarks for Each Land-use Category

Land Use Class	GIA m ²	NO _x Transport Emissions Benchmarks (gNO _x /dwelling.annum)	PM ₁₀ Transport Emissions Benchmarks (gNO _x /dwelling.annum)	NO _x Benchmarked Emissions (kgNO _x /annum)	PM ₁₀ Benchmarked Emissions (kgNO _x /annum)
Office & Commercial (E(c))	8,781	11.4	2.05	100.10	18.00
Total Benchmarked Transport Emissions				100.10	18.00

Table 7-8. Calculation of Air Quality Neutral Transport Emissions

Land Use / Area	Land Use Class	Annual Trips	NO _x Emission Factor (g/vehicle-km)	PM ₁₀ Emission Factor (g/vehicle-km)	Average Distance Travelled (km)	NO _x Transport Emissions (kg/annum)	PM ₁₀ Transport Emissions (kg/annum)
Office & Commercial	E(c)	5,475	0.370	0.0665	7.7	15.60	2.80
Total Calculated Transport Emissions (kg/annum)						15.60	2.80

- 10.6 Given the above, it is considered the development would be in accordance with policy CC4 of the Local Plan.

11 SUSTAINABLE DESIGN AND CONSTRUCTION

Relevant policies

- 11.1 The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use of decentralised energy and renewable energy technologies. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. It requires all developments to achieve a 20% reduction in CO₂ emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures.

Retention, extension and refurbishment of existing building

- 11.2 One of the strengths of the current scheme is that it proposes the retention of the building in its entirety (aside from some minor demolition works at third floor level to accommodate the proposed roof extensions), which is largely a result of the generous floor to ceiling heights in the existing building. The proposal therefore complies with a fundamental part of Policy CC1 which states that the possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed. A condition is included to ensure 95% of waste from demolition works is diverted from landfill.

Energy Hierarchy

- 11.3 Policy SI2 of the London plan requires development to be designed in accordance with the energy hierarchy: Be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). This part of the London Plan sets out

the need for schemes to be net carbon zero and secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013.

Carbon Reduction

- 11.4 With regard to CO2 reductions, the Council's Energy and Sustainability Officer has reviewed the submitted documents and confirmed the development would achieve a 54% reduction in CO2 emissions, which significantly exceeds the minimum 35% reduction requirement.
- 11.5 Notwithstanding this, the Council will seek to secure a carbon offset payment of £192,375 in respect of the London Plan zero carbon target and based on the current carbon offset rate of £2,850/tonne. Carbon offset payments are sought when a Local Planning Authority is satisfied that a particular development has maximised on-site reductions, but the development is still falling short of achieving net zero carbon. This payment will be secured as part of the associated s106 legal agreement.

Renewables

- 11.6 Officer's note that despite the development complying with the requirement to secure a minimum reduction in CO2 emissions of 35%, it is also required to achieve 20% of this target through renewable technologies. The proposed development would achieve a 'Be Green' figure of 14.9% (extended part of the building) and 44% (within the refurbished parts) above the 20% target, which is largely a result of ASHP's being used to provide the main source of heating and cooling for the proposed building.

Sustainability

- 11.7 The application is supported by a Sustainability Statement which details the sustainable design features of the proposal and provides a summary of the BREEAM Pre-Assessment and credits which are being targeted. Overall, a BREEAM score of 74.6% (Excellent) is currently being targeted. This will be secured as part of the s106 legal agreement.
- 11.8 Given the above, and subject to the suggested conditions and a Sustainability and Energy Plan being secured by S106 agreement, the proposed development is considered to comply with policies CC1 and CC2 of the Local Plan.

12 FLOOD RISK AND DRAINAGE

- 12.1 Camden Local Plan policy CC3 is relevant with regards to flood risk and drainage. Part (e) requires development to utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible.
- 12.2 A Flood Risk Assessment (FRA) has been submitted as part of this application which identifies low risk of surface water flooding. The FRA states "A total area of 416.9m² (~23% of the site area) is unable to drain to the proposed blue roofs via gravity which include mansard roofs, building extrusions and lightwells. These

areas are proposed to discharge unrestricted as existing to the TW sewer at a peak rate of 26.8 l/s for the 1 in 100 year + 40% climate change peak storm event.”

- 12.3 The proposed flooding and drainage details have been reviewed by the Councils Flood Risk Officer who is satisfied that the feasible areas are being drained into the Councils preferred attenuation of blue roofs. The applicant has also provided a written letter from Thames Water confirming they accept the run off rate of 31l/s from the whole site.
- 12.4 As such, the proposed development is considered acceptable with regard to flood risk and drainage.

13 TREES AND LANDSCAPING

- 13.1 Policy A3 of the Local Plan are relevant with regard to the proposed public open space and landscaping works.
- 13.2 The proposals include some minor improvements to the public realm including the installation of planters along Judd Street and Thanet Street as well as the widening and cleaning of the existing pavements surrounding the site and the replacement of any broken paving/kerb stones. All existing street trees surrounding the building would be retained and their pits made uniform and re-surfaced, which is welcomed. The proposals also include soft landscaping to the proposed roof terrace areas and a green roof which is welcomed, particularly in sustainability terms.
- 13.3 Details of all landscaping and public works will be secured by condition and as part of the s106 legal agreement. As such the proposals are considered to be in accordance with Policies A2 and A3 of the Local Plan.

14 TRANSPORT

Relevant policies

- 14.1 Camden Local Plan policies T1, T2, T3 and T4 and Supplementary Guidance Document CPG (Transport) are relevant with regards to transport issues. The overarching aims of the Council’s transport policies is to consider the impacts of movements to, from and within a site, including links to existing transport networks.

Site

- 14.2 The site occupies the entire of 105-121 Judd Street, which has frontages on Judd Street, Hastings Street and Thanet Street. The site is in close proximity to Kings Cross Station and St Pancras Station. There are also several bus stops serving various routes located nearby on Euston Road. The location is easily accessible by public transport with a PTAL rating of 6b (best). The existing site is made up of 7026 m² of office space (class E), and proposes to increase this by 1872sqm.

Cycle parking

Long stay

- 14.3 The proposal is required to provide long stay cycle parking spaces which meet the minimum standards within the London Plan, in accordance with Policy T1 of the

Local Plan. The proposals include the provision of 153 long stay spaces made up of 4 enlarged cycle spaces and 14 sheffield stands for accessible bikes, 120 two-tier rack spaces and 15 foldable locker spaces. The Transport Assessment (TA) and proposed plans confirm that 5% of spaces will be configured to accommodate non-standard cycle designs including those for users with mobility impairments.

14.4 The level of provision exceeds the minimum requirements set in the London Plan and the additional 20% stated in *CPG Transport* for the floor space of the entire building, which is welcomed. Changing and shower facilities, along with 153 lockers are also proposed. The cycle store is accessed via a lift which meets minimum requirements. The provision and ongoing retention of the cycle parking and associated facilities would be secured by condition.

Short stay

14.5 The development is required to provide a minimum of 17 short stay spaces in accordance with the London Plan. These spaces will be provided in the public realm adjacent to the building and in the vicinity of the site. There are 8 spaces currently located on Thanet Street, directly adjacent to one of the buildings entrances, and these spaces will be re-provided as part of the public realm works.

14.6 If the additional spaces required can't be provided within the ownership boundary on Judd Street, the Council will look to introduce these spaces on the public realm in the vicinity of the site, which will likely be on Judd Street adjacent to the entrance to the building and the cafe. The cost for the implementation of re-providing the existing spaces and providing new spaces will be provided for within the Highways Contribution.

Trip Generation

14.7 The submitted Transport Assessment (TA) includes details of trip generation analysis from the TRICS trip generation software. The results predict the proposed development would generate a total uplift of 61 trips in the AM peak and 55 trips in the PM peak compared to the existing use of the site.

14.8 Using travel to work data from census data and adjusting for the fact the development is car free, the following modal share and trip generation has been calculated and summarised in the table below:

Mode	Share %	8:00-9:00 two-way tips	17:00-18:00 two-way trips
Underground	40%	93	84
Rail	30%	69	62
Bus	11%	24	22
Motorcycle	2%	3	3
Taxi	0%	0	0
Cycle	8%	26	24
Walk	7%	13	12
Total	100%	229	208

- 14.9 The results of the assessment suggest that the proposed development as a whole will attract a large number of trips to the site. The majority of these trips are likely to be via public transport, however the Council anticipates that a higher modal share for cycling and walking can be achieved via a travel plan and the implementation of public realm improvements in the local area to make cycling and walking more attractive to staff and visitors.

Travel Plan

- 14.10 As detailed above, there is a significant number of predicted trips associated with the site. A draft travel plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport.
- 14.11 A workplace travel plan and associated monitoring and measures contribution of £5,196 will be secured as a section 106 planning obligation if planning permission were granted. The Travel Plan would be targeted towards the office use to encourage staff and visitors to make walking, cycling and travel by public transport the natural choice for day-to-day trips.

Car parking

- 14.12 The development will be secured as car free, restricting occupiers from obtaining business parking permits. The proposed development is unable to provide any internal servicing area for vehicles and no car parking is provided. A car-free planning obligation would be secured by s106 legal agreement in accordance with Policy T2 if planning permission were granted.

Deliveries and Servicing

- 14.13 The applicant has prepared a Draft Delivery and Servicing Plan which has been reviewed by the Council's transport officer.
- 14.14 The majority of the servicing activity will take place from Thanet Street, which will allow direct access to the servicing entrance and refuse stores to the building. The reconfiguration of the building will also mean refuse bins will be stored within the building and wheeled out to the roadside for collection. There are also single yellow lines on Judd Street outside the proposed main entrance which would allow for vehicles to load/unload.
- 14.15 As Judd Street forms part of the C6 cycleway, all deliveries will need to take place outside of the AM and PM peak periods. The servicing related trips should have a limited impact on the surrounding highway network as long as they are managed effectively. To ensure that deliveries, refuse and recycling collections and other servicing vehicles do not have a severe impact on the area, a servicing management plan will be secured as a section 106 planning obligation if planning permission were granted.
- 14.16 Officers note the comments received from TfL who, whilst not objecting to the application, have requested that a Construction Logistics Plan is provided showing vehicle swept paths and details of the parking and loading arrangements for construction vehicles as well as any highway works proposed for construction.

These details will be included within the Construction Management Plan (see below) secured as part of the s106 legal agreement and will need to be agreed with TfL prior to the commencement of development on site.

- 14.17 A delivery and Servicing Management Plan will be secured as a section 106 planning obligation if planning permission were granted.

Public Realm Improvements and Highways Works

- 14.18 The development includes proposals for public realm improvements both within the site boundary and on the public highway in the surrounding streets adjacent to the development site. These changes are summarised below.

Judd Street

- 14.19 Improvements within the site boundary include introducing benches and raised planters, seating for the café, reconfiguration of the building access and repaving to better match the public highway. Improvements to the public highway includes improvements to tree pit surrounds, replacing kerbs and artificial paving stones with natural York stone.

Hastings Street

- 14.20 Improvements to the public highway includes improvements to tree pit surrounds, replacing kerbs and artificial paving stones with natural York stone.

Thanet Street

- 14.21 Improvements to the public highway includes improvements to tree pit surrounds, removing redundant crossovers, new kerbs and new natural York stone paving where required, a new ramp for refuse/recycling bins, cycle parking stands, two new planted/SUDs areas and a location for service vehicles to load and unload.

- 14.22 The estimate for the works will include the provision of an additional 9 short stay cycle parking spaces.

- 14.23 The carriageway and footway directly adjacent to the site is likely to sustain significant damage as a result of the proposed demolition and construction works required. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development. The remedial work will form part of the public realm work discussed above.

- 14.24 A contribution would need to be secured as a section 106 planning obligation if planning permission is granted. This would allow the Council to repair any other damage to the public highway in the general vicinity of the site and provide the public realm improvements on the public highway discussed above. A combined financial contribution of £79,697.70 would be secured as part of the s106 agreement. The works to the public highway would be implemented by the Council's highways contractor on completion of the development. All designs and work will be subject to detailed design and any consultation that is required, and will only be implemented if deemed feasible by the council.

14.25 While improvements proposed to the public realm are welcomed by the Council, it should be noted that the final design will be at the Council's discretion, and all designs and work will be subject to detailed design and any consultation that is required and will only be implemented if deemed feasible by the council.

Managing and mitigating the impacts of construction

14.26 Construction management plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Our primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

14.27 A draft CMP has been provided as part of the planning application. While the information provided in the draft is useful, a more detailed CMP would be required if planning permission is granted. The final CMP would require significant input from Council officers, local residents and other stakeholders before being approved. A CMP implementation support contribution of £9,455.63 would be secured via a Section 106 planning obligation if planning permission were granted.

14.28 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. This is very important due to the location of cycle and pedestrian routes adjacent to the site. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

Construction Impact Bond

14.29 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 nature of the development and the location of the site, the Council may have to allocate resources to monitor and support the delivery of obligations secured through the CMP. A construction impact bond of £15,000 would need to be secured via a Section 106 planning obligation if planning permission were granted.

Conclusion

14.30 The proposal would be acceptable in terms of transport implications subject to the following section 106 planning obligations being secured:

- Car free
- A condition securing the provision of 153 CPG Transport compliant long/short stay cycle spaces

- Delivery and Servicing Management Plan
- Local Level Workplace Level Travel plan and associated monitoring and measures contribution of £5,196
- Pedestrian, Cycling and Environmental Improvements contribution & Highways contribution – £79,697.70
- Construction impact bond - £15,000
- Construction Management Plan (CMP) and CMP implementation support contribution of £9,455.63

15 SAFETY AND SECURITY

15.1 Local Plan policy C5 (safety and security) and CPG (Design) are relevant with regards to secure by design.

15.2 The current application relates to the extension of an existing building and is not considered to generate increased issues of crime and anti-social behaviour at the site. Notwithstanding this, the proposals include a series of improvement works to the building at ground floor level (and within the public realm) which seek to activate the three elevations of the building. The removal of window vinyl's and reopening of closed off entrances to the building, as well as the inclusion of a café at ground floor level, are all considered to improve the activity of the building at ground floor and would improve passive surveillance at the site.

15.3 The applicant will continue to liaise with the Police with the aim of achieving Secured by Design accreditation.

Fire safety

15.4 The application is accompanied by a fire statement which details 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 would be made within the site to enable fire fighters to gain access to the building. A condition ensuring compliance with this document is attached to the recommendation.

16 REFUSE AND RECYCLING

16.1 Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.

16.2 The proposed reconfiguration of the existing building has allowed for the waste storage area to be located within the internal envelope of the building with bins being wheeled out to the roadside for collection. This is considered to be an improvement on the current waste storage arrangements at the site, where bins are stored externally in a locked enclosure.

16.3 An Operational Waste Management Plan (OWMP) has been included as part of the proposals which is useful. However, this plan will need to be updated prior to

occupation of the building when the waste management proposals for the building are more developed. Details of an OWMP and as well as a delivery servicing management plan will be secured as a section 106 planning obligation to ensure any impacts to highway and pedestrian safety, as well as neighbouring amenity, are sufficiently mitigated.

16.4 Given the above, the current proposals are considered to provide adequate waste storage facilities for the proposed development.

17 EMPLOYMENT AND TRAINING OPPORTUNITIES

17.1 The proposed development is considered large enough to generate local economic benefits. Camden Local Plan policies E1 and E2 and Camden Planning Guidance (Employment Sites and Business Premises) state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services. This would include:

17.2 Construction phase

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per section 68 of the Employment sites and business premises CPG.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be confirmed) of construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 70 of the Employment sites and business premises CPG.
- The applicant must recruit 10 construction apprentices (1 per £3million of build costs) and pay the council a support fee of £1,700 per apprentice as per section 65 of the Employment sites and business premises CPG.
- The applicant to sign up to the Camden Local Procurement Code, as per section 71 of the Employment sites and business premises CPG.
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

End use phase

- Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers
- Working with Camden Learning/STEAM on school engagement
- Working with end use occupiers to offer work experience placements
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally.
- Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives.

- A s106 contribution to be used by the Inclusive Economy service to support employment and training activities and local procurement initiatives. This contribution would be calculated as follows:

Net increase in floorspace (sqm GIA) 1872sqm / 12sqm [space requirement per full time employee] = 156 full time jobs created

Full time jobs created 156 x 21% [% of Camden residents who work in Camden] = 32 jobs for Camden Residents

32 x 35%[% of employees requiring training] = 11 employees who need training

11 x £3,995 [£ per employee requiring training] = **£43,945.00**
employment and training contribution.

17.3 This package of recruitment, apprenticeship and procurement measures will be secured via the associated s106 legal agreement. The proposals are therefore in accordance with the guidance set out in CPG (Employment sites and premises) and policies E1 and E2 of the Camden Local Plan.

18 PLANNING OBLIGATIONS

18.1 The following financial contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

Contribution	Amount (£)
Highways and pedestrian, cycling and environmental contributions	£79,697.70
Travel plan monitoring contribution	£5,196
CMP implementation support contribution	£9,455.63
Construction impact bond	£15,000
Carbon offset payment	£192,375
Affordable housing PIL	£1,404,000
Employment and training contribution	£43,945.00
TOTAL	£1,749,669.33

19 COMMUNITY INFRASTRUCTURE LEVY

Mayor of London's Crossrail CIL

19.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the addition of more than 100sqm floorspace. Based on the Mayor's CIL charging schedule and the information provided as part of the application, the Mayoral CIL is based at £185 per sqm for development within Band 1. £185 x 1872sqm = **£346,320**. This would be collected by Camden after

the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

20 **Camden CIL**

20.1 The proposal would be liable for the Camden Community Infrastructure Levy (CIL). The site is located within Zone A of the Council's recently updated CIL charging schedule. The estimate based on an uplift in floorspace of 1872sqm, is **£205,920**.

21 **CONCLUSION**

21.1 Overall, the proposed development is considered to be a carefully conceived and high quality scheme which is a result of extensive pre-application discussions. The size, scale and design of the proposed extensions are considered to represent sympathetic additions that champion modern design whilst being respectful to the historic value of the site and surrounding conservation area.

21.2 In land use terms the proposed extension of an existing office building in the Central London Area and Knowledge Quarter District is supported, and would satisfy a number of the Council's local plan policies whilst delivering a variety of employment benefits including affordable workspace. Whilst the absence of any on-site housing is regrettable, it is considered acceptable in this instance given the nature of the proposed use and the difficulties in providing good quality residential accommodation as part of a mix of uses at the site. The lack of housing in the scheme would be mitigated by the financial contribution (payment in lieu) toward affordable housing which would be secured as part of the s106 legal agreement.

21.3 The development has been designed as sensitively as possible to have regard to the amenity of neighbouring residents. Whilst there would be some daylight/sunlight impacts to neighbouring residents, these impacts are considered acceptable overall and would ensure neighbouring properties continue to receive light levels commensurate with a finely grained central London location such as this.

21.4 The proposals are also considered to represent a highly sustainable form of development by adapting and extending an existing commercial building for modern purposes, which is an approach that is fully supported by the Council and will act as an example for future development sites to follow.

21.5 The application is therefore recommended for approval subject to conditions and the signing of a s106 legal agreement.

22 **RECOMMENDATIONS**

22.1 **Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement securing the following Heads of Terms.**

1 Housing

- Affordable Housing PIL - £1,404,000

2 Employment and training

- **Employment and Training Plan** - Local Employment, Local Procurement, Construction Apprentice Default Contribution, Construction Apprentice Support Contribution, Employment Post Construction
- **Affordable workspace** – 102m², subsidised at 50% of comparable rents for a 20 year period
- **Employment and Training Contribution** – £43,945.00

3 Energy and sustainability

- Carbon Offset Contribution - £192,375
- Energy Efficiency and Renewable Energy Plan
- Sustainability Plan - BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%)

4 Transport

- Car free
- Construction Management Plan (CMP), including construction logistics plan and associated requirement for a Construction Working Group to be formed prior to commencement.
- CMP implementation support contribution - £9,455.63
- Construction impact bond - £15,000
- Local level workspace travel plan - £5,196
- Financial contribution of £79,697.70 for highways works and pedestrian, cycling and environmental improvements in the general vicinity of the site
- Delivery, Servicing and Operational Waste Management Plan

25 LEGAL COMMENTS

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

Conditions

1	Three years from the date of this permission The development hereby permitted must be begun not later than the end of three years from the date of this permission. Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).
2	Approved drawings The development hereby permitted shall be carried out in accordance with the following approved plans:

	<p>Drawing Numbers: 4608-ST-07-GA-120, 4608-31-PL-208 A, 4608-31-PL-207 A, 4608-31-PL-206 A, 4608-31-PL-205 A, 4608-07-PR-204 B, 4608-07-PR-203 B, 4608-07-PR-202 B, 4608-07-PR-201 B, 4608-07-PR-302 A, 4608-07-PR-301 A, 4608-07-GA-106 A, 4608-07-GA-105 A, 4608-07-GA-104 A, 4608-07-GA-103 A, 4608-07-GA-102 A, 4608-07-GA-101 A, 4608-07-GA-100 A, 4608-07-GA-099 A, 4608-07-DM-105 A, 4608-07-DM-103 A, 4608-07-DM-102 A, 4608-07-DM-101 A, 4608-07-DM-100 A, 4608-07-DM-099 A, 4608-07-DM—204 A, 4608-07-DM-203 A, 4608-07-DM-202 A, 4608-07-DM-201 A, 4608-07-EX-304 A, 4608-07-EX-301 A, 4608-07-EX-204 A, 4608-07-EX-203 A, 4608-07-EX-202 A, 4608-07-EX-201 A, 4608-07-EX-105 A, 4608-07-EX-104 A, 4608-07-EX-103 A, 4608-07-EX-102 A, 4608-07-EX-101 A, 4608-07-EX-100 A, 4608-07-EX-100 A, 4608-07-EX-099 A, 4608-ST-EX-01-101 A, 4608-ST-EX-00-001 A</p> <p>Background Papers and Supporting Documents: Flood Risk Assessment & SUDS Strategy Parts 1-7, Phase 1 Land Contamination Report 11121-A2SI-XX-XX-RP-X-0001-00, Townscape, Heritage and Visual Impact Assessment March 2022, Air Quality Assessment 4th March 2022, Statement of Community Involvement April 2022, WLCA 13th April 2022, Energy Statement Parts 1-3 13th April 2022, Circular Economy Statement 13th April 2022, Preliminary Ecological Appraisal February 2022, Urban Greening Factor February 2022, Biodiversity Impact Assessment April 2022, Planning Statement April 2022, Operational Waste Management Strategy March 2022, Transport Statement March 2022, Sustainability Statement 13th April 2022, Structural Planning Report parts 1-9, Noise Assessment March 2022, Fire Statement 3rd March 2022, Draft Employment, Skills and Supply Plan, GIA Daylight & Sunlight Assessment parts 1-2, Gerald Eve cover letter 12th April 2022, Assessment of development proposals which would accord with BRE Daylight Guidance 28/07/2022.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Detailed drawings/samples</p> <p>Prior to commencement of the relevant part of the development, detailed drawings, information or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council</p> <p>a) Plan, elevation and section drawings, of all external windows, window reveals and doors at a scale of 1:20;</p> <p>b) Samples and manufacturer's details at a scale of 1:20, of all facing materials including windows and door frames, glazing, brickwork and cladding;</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and each</p>

	<p>development shall be carried out in accordance with the approval given.</p> <p>c) Details of all hard and soft landscaping within the public realm;</p> <p>d) Details of landscaping features and plant species to be incorporated within the roof terraces;</p> <p>e) Details of proposed CCTV and lighting strategy</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the surrounding conservation area in accordance with the requirements of policy D1 and D2 of the Camden Local Plan 2017.</p>
4	<p>Landscaping - replacement planting</p> <p>All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development. Any trees or 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: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
5	<p>Tree protection</p> <p>Prior to the commencement of any works on site, details demonstrating how trees to be retained shall be protected during construction work shall be submitted to and approved by the local planning authority in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". 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 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 London Borough of Camden Local Plan 2017.</p>

6	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the Camden Local Plan 2017.</p>
7	<p>Air quality – construction impacts</p> <p>Air quality monitoring shall be implemented on site. No development shall take place until</p> <p>a. prior to installing 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 have been installed in line with guidance outlined in the GLA’s Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</p> <p>b. prior to commencement, evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date.</p> <p>The monitors shall be retained and maintained on site for the duration of the development 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 (Managing the impact of development) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.</p>
8	<p>Non-road mobile machinery</p> <p>All Non-road Mobile Machinery (NRMM) used during the course of the development that is within the scope of the GLA ‘Control of Dust and Emissions during Construction and Demolition’ Supplementary Planning Guidance (SPG) dated July 2014, or any successor document, shall comply with the low emission zone requirements therein and be registered for use on the NRMM register (or any superseding register).</p> <p>Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017, and policy 7.14 of the London Plan and the Mayor’s SPG: The Control of Dust and Emissions</p>

	During Construction and Demolition.
9	<p>Land contamination – site investigation</p> <p>Prior to commencement of any development other than works of demolition, site clearance & preparation, a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas shall be submitted to and approved by the local planning authority in writing.</p> <p>Site investigation shall be carried out in accordance with the approved programme and the results and a written scheme of remediation measures [if necessary] shall be submitted to and approved by the local planning authority in writing.</p> <p>The remediation measures shall be implemented strictly in accordance with the approved scheme and a written report detailing the remediation shall be submitted to and approved by the local planning authority in writing prior to occupation.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
10	<p>Roof terrace hours</p> <p>The proposed roof terraces hereby approved shall only be accessed between the hours of 08:00 and 20:00 Monday to Friday.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy A1 of the London Borough of Camden Local Plan 2017.</p>
11	<p>Roof terrace noise</p> <p>No music shall be played on the premises 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, CC1, D1, A1, and A4 of the London Borough of Camden Local Plan 2017.</p>
12	<p>Plant and equipment – acoustic isolation</p> <p>Prior to occupation, the approved plant shall be provided with acoustic isolation, sound attenuation and anti-vibration measures in accordance with the scheme approved in writing by the local planning authority. All such measures shall thereafter be retained and maintained in accordance with the</p>

	<p>manufacturers' recommendations.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy G1, A1, A4, D1 and CC1 of the London Borough of Camden Local Plan 2017.</p>
13	<p>Plant and equipment – noise compliance</p> <p>Noise levels at a point 1 metre external to sensitive facades shall be at least 10dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 15dB(A) below the LA90, expressed in dB(A).</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
14	<p>Cycle parking</p> <p>The cycle storage space as shown on the plans hereby approved shall provide 153 CPG Transport (2021) compliant long stay cycle parking spaces at the site. The facilities shall be provided in their entirety prior to first occupation of the relevant part of the development, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>
15	<p>Bird and bat boxes</p> <p>Prior to first occupation of the development a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of policy A3 of the Camden Local Plan 2017.</p>
16	<p>Living roof details</p> <p>Prior to commencement of the relevant part of the development full details of the biodiverse, substrate-based extensive living roofs to be incorporated into the development shall be submitted to and approved in writing by the local</p>

	<p>planning authority. The design and planting scheme should be informed by the Ecological Appraisal and should reflect the local conditions and species of interest. The details shall include:</p> <ul style="list-style-type: none"> - detailed maintenance plan; - details of its construction and the materials used; - a section at a scale of 1:20 showing substrate depth averaging 130mm with added peaks and troughs to provide variations between 80mm and 150mm; - full planting details including species showing planting of at least 16 plugs per m². The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the premises are first occupied. <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, CC2 and CC3 of the London Borough of Camden Local Plan policies.</p>
17	<p>Air source heat pumps</p> <p>Prior to commencement of the relevant part of the development, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the buildings, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include a commitment to monitor performance of the system post construction. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
18	<p>Diversion of waste from landfill</p> <p>The demolition works hereby approved shall divert 95% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.</p>

	Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017.
19	<p>Waste storage</p> <p>The ground floor refuse and recycling store shall be provided prior to the first occupation of the building and permanently retained thereafter.</p> <p>Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policies A1 and CC5 of the Camden Local Plan 2017.</p>
20	<p>Fire Safety</p> <p>The development shall be carried out in accordance with the provisions of the Fire Statement prepared by NDR dated 03/03/2022 unless otherwise approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12</p>
21	<p>SUDs</p> <p>The sustainable drainage system as approved shall be installed as part of the development 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 and to achieve a run off rate of 3l/s.</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 and Policy SI 13 of the London Plan 2021.</p>

Informatives

1	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
2	This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant

	<p>licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
3	<p>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 are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.</p>
4	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319 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)</p> <p>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.</p>
5	<p>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</p>