

Address:	2 Waterhouse Square 140 Holborn London EC2N 2ST		1
Application Number(s):	2023/3419/P	Officer: Christopher Smith	
Ward:	Holborn & Covent Garden		
Date Received:	04/08/2023		
Proposal (full planning application): Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) at 2 Waterhouse Square including external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.			

Existing Plans and Drawings (all Rev. C01 unless specified):

WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan

WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan

WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan

WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan

WHS-ORM-2W-04-DR-A-12504 Existing General Arrangement Fourth Floor Plan

WHS-ORM-2W-05-DR-A-12505 Existing General Arrangement Fifth Floor Plan

WHS-ORM-2W-06-DR-A-12506 Existing General Arrangement Sixth Floor Plan

WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan

WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A

WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan

WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B

WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C

WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D

WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation

WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E

WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan

WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation

WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation

WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation

Proposed Plans and Drawings (all Rev. C01 unless specified):

WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan

WHS-ORM-2W-00-DR-A-12600 (Rev. C02) Proposed Demolition Ground Floor Plan

WHS-ORM-2W-00-DR-A-12700 (Rev. C04) Proposed General Arrangement Ground Floor Plan

WHS-ORM-2W-01-DR-A-12601 Proposed Demolition First Floor Plan

WHS-ORM-2W-01-DR-A-12701 (Rev. C02) Proposed General Arrangement First Floor Plan

WHS-ORM-2W-02-DR-A-12602 Proposed Demolition Second Floor Plan

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WHS-ORM-2W-03-DR-A-12603 Proposed Demolition Third Floor Plan

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WHS-ORM-2W-06-DR-A-12606 Proposed Demolition Sixth Floor Plan

WHS-ORM-2W-06-DR-A-12706 (Rev. C02) Proposed General Arrangement Sixth Floor Plan

WHS-ORM-2W-07-DR-A-12707 (Rev. C02) Proposed General Arrangement Seventh Floor Plan

WHS-ORM-2W-AA-DR-A-12140 Proposed Planning Section A-A

WHS-ORM-2W-B1-DR-A-12699 Proposed Demolition Basement 1 Plan

WHS-ORM-2W-B1-DR-A-12799 (Rev. C02) Proposed General Arrangement Basement 1 Plan

WHS-ORM-2W-BB-DR-A-12141 Proposed Planning Section B-B

WHS-ORM-2W-CC-DR-A-12142 Proposed Planning Section C-C

WHS-ORM-2W-DD-DR-A-12143 Proposed Planning Section D-D

WHS-ORM-2W-EA-DR-A-12349 Proposed Planning Bay Study 10

WHS-ORM-2W-EA-DR-A-12350 Proposed Planning Bay Study 11

WHS-ORM-2W-EA-DR-A-12351 Proposed Planning Bay Study 12

WHS-ORM-2W-EA-DR-A-12352 Proposed Planning Bay Study 13

WHS-ORM-2W-EA-DR-A-12372 (Rev. C02) Proposed Planning R7 Heritage Block East Facade

WHS-ORM-2W-EE-DR-A-12144 Proposed Planning Section E-E

WHS-ORM-2W-LG-DR-A-12698 Proposed Demolition Lower Ground Floor Plan

WHS-ORM-2W-LG-DR-A-12798 (Rev. C02) Proposed General Arrangement Lower Ground Floor Plan

WHS-ORM-2W-NO-DR-A-12330 Proposed Planning North Elevation

WHS-ORM-2W-NO-DR-A-12331 (Rev. C03) Proposed Planning East Elevation

WHS-ORM-2W-NO-DR-A-12340 Proposed Planning Bay Study 01

WHS-ORM-2W-NO-DR-A-12341 Proposed Planning Bay Study 02

WHS-ORM-2W-NO-DR-A-12342 Proposed Planning Bay Study 03

WHS-ORM-2W-NO-DR-A-12343 Proposed Planning Bay Study 04

WHS-ORM-2W-NO-DR-A-12344 Proposed Planning Bay Study 05

WHS-ORM-2W-NO-DR-A-12345 Proposed Planning Bay Study 06

WHS-ORM-2W-NO-DR-A-12346 Proposed Planning Bay Study 07

WHS-ORM-2W-NO-DR-A-12347 Proposed Planning Bay Study 08

WHS-ORM-2W-NO-DR-A-12348 Proposed Planning Bay Study 09

WHS-ORM-2W-NO-DR-A-12371 Proposed Planning R7 Heritage Block North Facade

WHS-ORM-2W-RF-DR-A-12607 Proposed Demolition Roof Plan

WHS-ORM-2W-SO-DR-A-12332 Proposed Planning South Elevation

WHS-ORM-2W-SO-DR-A-12353 Proposed Planning Bay Study 14

WHS-ORM-2W-SO-DR-A-12370 Proposed Planning R6 Heritage Block South Facade

WHS-ORM-2W-WE-DR-A-12333 Proposed Planning West Elevation

WHS-ORM-2W-WE-DR-A-12354 Proposed Planning Bay Study 15

WHS-ORM-2W-WE-DR-A-12355 Proposed Planning Bay Study 16

WHS-ORM-2W-ZZ-DR-A-12360 Proposed Planning Entrance Elevations

Supporting Documentation:

Design and Access Statement, and Townscape Assessment (July 2023)

Planning Statement (November 2023)

Planning Report (July 2023)

Noise Impact Assessment (July 2023)

Sustainability Statement (August 2023)

Daylight, Sunlight and Overshadowing Report (July 2023)

Construction/Demolition Management Plan (July 2023)

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Heritage Assessment (July 2023)

Statement of Community Involvement (August 2023)

Operational Waste Management Strategy (July 2023)

Drainage Strategy Report (October 2023)

Air Quality Assessment (October 2023)

Active Travel Zone Assessment Technical Note (November 2023)

RECOMMENDATION SUMMARY:

Grant conditional planning permission following:

- (i) Completion of Section 106 Legal Agreement.**

Applicant:			Agent:	
Prudential Assurance Company Limited			Gerald Eve LLP	
Address:		2 Waterhouse Square 140 Holborn London EC2N 2ST		2
Application Number(s):		2023/3420/L	Officer: Christopher Smith	
Ward:		Holborn & Covent Garden		

Date Received:	04/08/2023
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Proposal (listed building consent application): Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) at 2 Waterhouse Square including external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.

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Active Travel Zone Assessment Technical Note (November 2023)	
RECOMMENDATION SUMMARY: Grant conditional listed building consent	
Applicant:	Agent:
Prudential Assurance Company Limited	Gerald Eve LLP

Land Use Details:			
	<i>Use Class</i>	<i>Use Description</i>	<i>Floorspace (GIA sqm)</i>
Existing	Class E(gi) – Offices		29,226
	EXISTING TOTAL		29,226
Proposed	Class E (Commercial, business and service use)		29,531
	Class E (Commercial, business and service use)		322
	PROPOSED TOTAL		29,853 (+627)

Parking Details:		
	Car Parking Spaces (General)	Cycle Parking Spaces
Existing	11	36
Proposed	0 (zero)	457

Addendum to previous report and the earlier Planning Committee meeting

1. Summary

- 1.1. On 14th December 2023 the applications referenced above were presented to the Planning Committee (agenda items 7(1) and (2)). The Committee voted to defer the items subject to the provision of further information relating to the impact of the proposed development on the nearby St Mungo's homeless accommodation building in respect of equalities and day/sunlight

impacts. Further information was also requested during the meeting in respect of the proposed development's impact on the adjacent Leather Lane market, details of how the affordable housing contribution has been calculated, and details of how responses to the public consultation for the development had been taken into account as part of these applications.

1.2. Furthermore, since the date of the Planning Committee referenced above there have also been changes to the planning history and heads of terms, due to the finalisation of the paperwork for a lawful development certificate at this site and the provision of additional planning obligations following discussions with the applicant. Further details on these points are provided in the Sections 8 & 9 below.

1.3. The Council has also undertaken an Equalities Impact Assessment, which is provided in Appendix 1; this is specifically in order to address the concerns raised by Members in relation to St Mungo's homeless accommodation. Additional information has been submitted by the applicant in the form of an addendum daylight and sunlight assessment and this is provided in Appendix 2. The applicant has also met with St Mungo's to discuss these applications and details of these discussions are included in Appendix 3. The officer report to the 14th December Planning Committee (updated to include changes from the supplementary agenda and late tabled paper) and minutes from that committee are provided in Appendices 4A and 4B.

1.4. These matters referenced above are considered in further detail below, under the following headings:

- 2. Equalities impact assessment**
- 3. Land use – removal of the bar**
- 4. Impact on the Leather Lane market**
- 5. Affordable housing contribution**
- 6. Daylight and sunlight impacts**
- 7. Public consultation**
- 8. Planning history**
- 9. Heads of terms update**

2. Equalities impact assessment

2.1. The Council has undertaken an Equalities Impact Assessment to assess the potential impact of the development on protected groups; more particularly any such groups that reside in St Mungo's homeless accommodation facility located at 16 Brooke Street on the northern side of Brooke's Market. The applicant has also undertaken further conversations with St Mungo's.

2.2. As such, following the further analysis of equalities matters the equalities issues relevant to this application are assessed below.

Public Sector Equality Duty

2.3. Section 149 of the Equality Act 2010, sets out the Public Sector Equality Duty (PSED). A public authority must, in the exercise of its functions, have due regard to the need to— (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

2.4. To advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, involves having due regard, in particular, to the need to take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

Equalities Impact Assessment Overview

2.5. An Equalities Impact Assessment (EqIA) has been carried out to assess the potential impact from the proposed development on protected groups and whether it could cause direct or indirect discrimination. The full EqIA is included in Appendix 1 and is also summarised below.

2.6. The existing site contains an office building and the proposal is for its extension and remodelling to provide additional office space, and additional Class E commercial space on the ground floor, this would not have any on-site negative impacts on individuals with protected characteristics. However, there is residential accommodation within some buildings surrounding the site that could potentially be negatively impacted by the proposed development. The EqIA has reviewed the potential for these impacts in respect of their potential to impact on equalities issues. The impact of the proposed development on other planning matters is discussed in the officer report (see Appendix 4A below) or elsewhere in this addendum report.

2.7. The EqIA indicates that the nearby St Mungo's homeless accommodation building and buildings containing social housing could accommodate residents that have one or more protected characteristics. Neither being homeless, nor being a social housing tenant, is considered a protected characteristic itself. However, these characteristics are 'additional characteristics' where the

Council has an interest in limiting and mitigating negative impacts and as such they have been considered as part of the EqIA process.

Equalities Impact Assessment Review

- 2.8. The St Mungo's homeless accommodation is occupied by both long- and short-term tenants. People identifying as homeless are more likely to be male, to be LGB+, to have either no religion or be Muslim, to be non-white, to be unmarried, and to be disabled than the remainder of the UK population (according to available statistics, which includes data from the Office for National Statistics and the 2021 Census). Typically, homeless people are more likely to be younger than the general UK population (over 50% of the homeless population in the UK are between 15 and 34 years of age) although it is understood that residents at St Mungo's are generally mostly older than this (mid-30s to late 70s currently).
- 2.9. There are two buildings adjacent to the application site that are understood to be occupied by social housing – these are 1-10 Cranley Buildings (opposite the site to the north, on the eastern side of Brooke's Market) and part of the Brooke's Court Estate (which backs onto the western side of Brooke's Market). Social housing occupiers are more likely to be disabled than those in other housing tenures. They are also more likely to be female than male.
- 2.10. The EqIA identifies that some negative impacts on nearby residents with the protected characteristics identified above could occur and that these impacts would generally occur as the result of construction works, such as blocking of local pedestrian pathways and roads, and general disturbance from noise, dust, odours, and other construction-related issues. Construction work is a temporary nuisance that is mainly controlled by environmental legislation. Further planning controls would be secured as part of these applications in the form of a construction management plan (CMP), a CMP implementation support contribution (£29,943), a CMP impact bond (£31,497) and a requirement for the developer to set up a construction working group that includes representatives from the local community. These would be secured through a Section 106 legal agreement should planning permission be granted.
- 2.11. The daylight and sunlight impact of the proposed development also has the potential to impact on occupiers of these nearby sensitive buildings. This matter was considered in detail as part of the report to the 14th December committee (see Appendix 4A – Section 11). The impact on the residents of St Mungo's has also been considered further (see Section 5 below). To summarise, the daylight and sunlight impacts of the development on nearby residents is considered acceptable within this urban environment context.

- 2.12. It is also relevant to note that there are significant public benefits that this development would bring to the local community which includes investment in the local economy, new commercial uses, increased passive surveillance onto local streets, access to new jobs both in construction and the end commercial uses, and a financial contribution towards affordable housing.

EqlA Summary

- 2.13. The EqlA identified that there could be some negative impacts to individuals with protected characteristics as part of this development proposal. However, it is considered that the benefits to the residents with protected characteristics would outweigh the potential harm in this case. There would not be a direct impact from the development on those with protected characteristics. However, it is acknowledged that some indirect impact is possible, as described above. This impact is anticipated to generally be limited and temporary in nature. Planning obligations have been secured to mitigate any negative impacts as far as is possible within the limits of the planning process.
- 2.14. Furthermore, it is considered that any negative impacts would be outweighed by the positive impacts of the development in terms of provision of new jobs and affordable housing, as well as local economic development.
- 2.15. As such, the proposed development is considered acceptable in terms of its equalities impact. Furthermore, it is considered that the EqlA demonstrates the Council has fulfilled the Public Sector Equality Duty and has had due regard to the requirements of Section 149 of the Equality Act.

3. Land use – removal of the bar

- 3.1. The proposed development included an option for one of the ground floor commercial units to be occupied by a bar (sui generis use). Following further consideration of the objections to this specific use from local residents and acknowledging the location of the St Mungo's homeless accommodation in close proximity to the site, the applicant has confirmed that this use will be removed from the proposals. The commercial unit will instead be occupied by a Class E activity, which potentially includes a range of uses with a commercial, business and service character.
- 3.2. The amended description for the proposed development is therefore (wording removed from the development description has been shown with a ~~strikethrough~~):

Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) ~~and flexible commercial/bar (Class E/sui generis) space~~ at 2 Waterhouse Square including external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.

3.3. This does not affect the overall proposed floor space quantum of the development, which remains at 29,853sqm (an increase of 627sqm), see table below for confirmation:

Use	Existing sqm (GIA)	Proposed sqm (GIA)	Change sqm (GIA)
Class E	29,226	29,853	+627

4. Impact on the Leather Lane market

4.1. Further clarification has been sought from the Council's Markets team as to the impact of the development proposal on the adjacent Leather Lane market.

4.2. The Markets team confirmed that they do not object to the proposed development in principle. They have stated that the new entrance to the refurbished office, which would be located on the eastern side of the building facing towards Greville Street, could lead to pressure to amend the layout of market stalls in the future. One market stall plot to the south of the market could obstruct pedestrian movements between Greville Street (point 1 shown in Figure 1 below) and the proposed new office building entrance (point 2 shown in Figure 1 below).

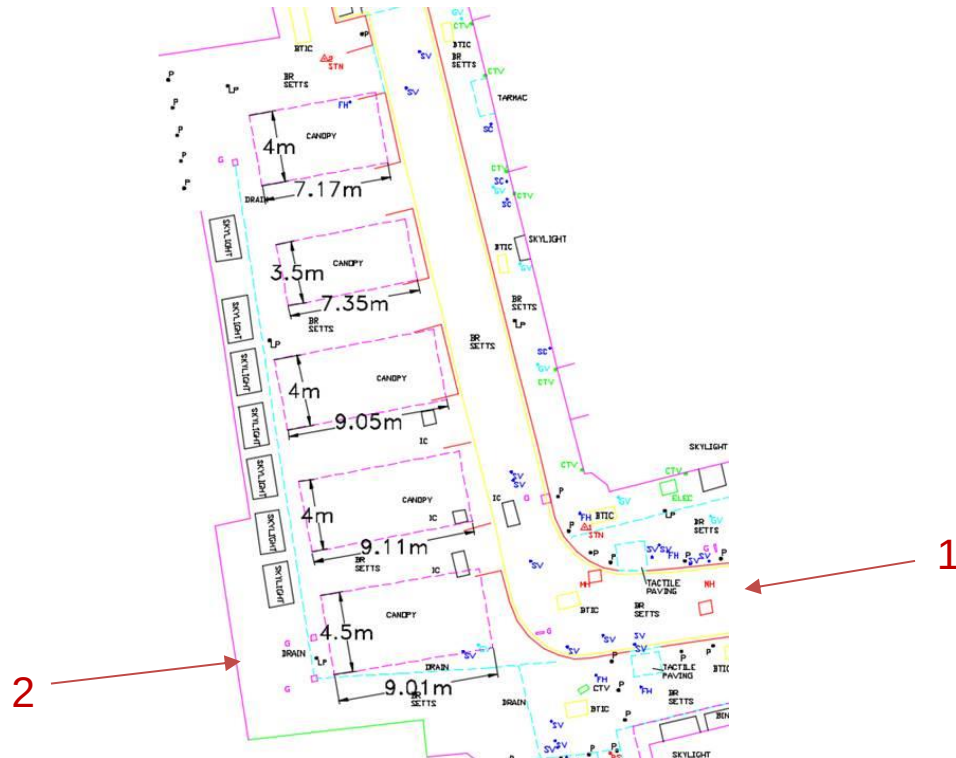


Figure 1: Map showing typical market layout on Leather Lane (east of site)

4.3. The Markets team have requested that further conversations take place with the applicant as to the future layout and management of the market stalls. These conversations can take place at a later date through a liaison officer secured through Section 106 legal agreement.

4.4. As such, the list of heads of terms has been updated (see Section 7 below).

5. Affordable housing contribution

5.1. The financial contribution in lieu of housing being provided on site, secured as part of this development proposal in accordance with Policy H2 of the Local Plan, is £470,250. The calculation for this figure to be reached was not described in the report for the 14th December committee and therefore it is instead provided below.

5.2. The requirement of Policy H2 is 50% housing on site unless this can be demonstrated not to be feasible. The reasons for the non-provision of housing on site are described in detail in paragraphs 8.8-8.11 of the report for the 14th December committee. The uplift in floor space from the development is 627sqm. 50% of 627sqm is 313.5sqm, which is the housing floorspace shortfall on site. 313.5sqm multiplied by £1,500 (the payment in lieu rate as described in CPG Housing) is £470,250. This financial contribution will be secured through Section 106 legal agreement.

6. Daylight and sunlight impacts

- 6.1. Daylight, sunlight and overshadowing impacts from the development proposal were considered in the report to the 14th December committee in paragraphs 11.3 to 11.18.
- 6.2. The Daylight, Sunlight and Overshadowing Report (dated 20th July 2023) originally submitted with the application assessed the impact of the development on the day and sunlight conditions of several buildings around the application site including building no. 8, which was erroneously referred to as 'Evelyn's Buildings' and which was assessed as being occupied by residential dwellings. Building no. 8 is now known to have the address 'The Lodge, 16 Brookes Market' and is also now known to be occupied by the St Mungo's homeless charity. The building includes a range of facilities and activities including office space for staff, and communal spaces, bathrooms and sleeping accommodation for residents. Bedrooms are predominantly located on the second floor and above of the six-storey building. St Mungo's have confirmed that the building is occupied by both short and longer-term residents. Noting that these bedrooms would be the only private space for residents within the building these spaces are therefore considered to be more sensitive to day and sunlight impacts, compared to standard residential bedrooms.
- 6.3. The applicant has submitted an addendum daylight and sunlight assessment (ADSA – see Appendix 2) which looks again at The Lodge and assesses the bedrooms of St Mungo's as if they were main habitable rooms (i.e. living rooms in a typical owner/occupier property).
- 6.4. The ADSA has assessed the day/sunlight impact to all windows on the southern elevation of The Lodge, which fronts onto Brooke's Market, except for those which provide light to hallways and staircases only. This includes existing office areas, which are not private spaces but which the ADSA acknowledges may have been used for communal space in the past and may be again the future.

Daylight Assessment

- 6.5. In terms of daylight both Vertical Sky Component (VSC) and No Sky Line (NSL) assessments were undertaken and presented within the ADSA in terms of the proposed development's impact on The Lodge. The Building Research Establishment (BRE) guidance considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.

6.6. The VSC test showed a maximum reduction in daylight of 7.31% to any room, which is relatively low in the context of the 20% reduction threshold. All but three rooms would have a retained VSC of more than 27% and which are therefore considered to be well-lit rooms. The low daylight reductions overall are well below the thresholds set by the BRE as demonstrating a noticeable light reduction.

6.7. In terms of NSL, the BRE consider that the NSL figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value). Seven rooms would experience reductions beyond the 20% BRE guideline. Two of these rooms would be affected only marginally beyond the 20% threshold (20.3% and 20.6%), three more would be affected by a less than 25% reduction (24.2%, 24.6% and 24.9%) and two more would be affected by a less than 30% reduction (28.6% and 28.8%). Although the loss of NSL in these cases means that the reduction in daylight would be noticeable the quality of access to daylight is still considered to be good as all reductions would be less than 30%, which is considered an acceptable level of daylight in a highly urbanised environment such as central London. As such, it is considered that the daylight impact on rooms is also acceptable in terms of NSL.

Sunlight Assessment

6.8. In terms of sunlight, Annual Probable Sunlight Hours (APSH) assessments have been undertaken. This is a measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive. The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if they result in a sunlight provision that is less than these targets, and if sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value.

6.9. The sunlight assessment undertaken shows that each room would retain a very good level of sunlight. The lowest proportion of retained sunlight is 52%, which is well above the BRE's 25% threshold. As such, the sunlight impacts of the development would be acceptable.

Summary

6.10. The initial assessment of the amenity impacts on neighbouring properties undertaken as part of the report to the 14th December committee stated that the relatively limited loss of daylight and sunlight to some residential properties would not cause an unacceptable level of harm to nearby residents, and also noted that the daylight or sunlight conditions to some properties would improve as a result of the proposed development. The impact of the proposal

on The Lodge (formerly referred to as 'Evelyn's Buildings') has been reassessed with the existing typology of accommodation in mind.

6.11. The reassessment found there would be a minor adverse impact on the daylight conditions at The Lodge in terms of a reduction in NSL only. The level of reduction is considered acceptable in a highly urbanised environment. Impact on daylight in terms of VSC is within the acceptable limits as stated by the BRE guidelines. Sunlight levels to The Lodge would continue to be very good, and also in accordance with BRE guidelines.

6.12. Overall, the proposed impact on daylight and sunlight amenity levels to rooms at The Lodge, and to other properties nearby, would be acceptable.

7. Public consultation

7.1. The applicant has been in discussions with St Mungo's and met with them on 18th January 2024 to seek their views on the proposed development directly. Details of these discussions are provided at Appendix 3.

7.2. As described in Section 2 above, to ensure that the impact of the development on the local community, including the residents of the St Mungo's homeless accommodation facility at The Lodge at 16 Brooke Street, is minimised the previously proposed bar use option for the commercial unit on the north-east corner of the site has been removed from the proposal. This represents an amendment to the scheme following consideration of the comments received as part of the application process.

7.3. The applicant has stated that they have taken on board comments made before and during the application process and have made changes to the development proposal where possible. An additional head of term has been secured to ensure that liaison continues with the local community post-permission, should this application be granted permission.

8. Planning history

8.1. Since the 14th December planning committee an application for this site that had been under assessment has been decided, as follows:

2023/1167/L. Infill of existing atria to provide additional office space. Certificate of lawfulness granted 16th November 2023.

- Granted as the works would be permitted development.

9. Heads of terms update

9.1. The list below shows the list of heads of terms that were presented as part of the documentation to the December 14th committee meeting and includes additional heads of terms (shown in **bold**) that have been agreed since that meeting (as described in the relevant sections above).

Contribution	Amount (£)
Travel plan, monitoring and measures	£11,221
Short stay cycle parking	£6,000
Car free	n/a
Disabled parking space	£4,000
CMP implementation support	£29,943
Impact bond	£31,497
Highways	£20,000
Brooke's Market public realm	£60,000
PCE contribution (HLN, cycle lanes, and micromobility)	£50,000
Construction working group	n/a
DSP	n/a
Energy plans & BREEAM	n/a
Mixed use/housing contribution	£470,250
Apprenticeships	£1,700 (1no. apprentice per £3m build costs = 1 x £1,700)
Employment and skills initiatives	• 20% local recruitment • Local procurement code (10% of build costs to be spend locally) • End user staff to be paid London Living Wage • End user apprenticeships • STEAM objectives
Community Liaison Officer	• Establishment of a post-permission role to enable the ongoing liaison and engagement with occupiers of properties close to the site, St Mungo's, the Council's Markets team and traders of Leather Lane market.

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Before beginning this equality impact assessment (EqIA) form, you should use the [EqIA screening tool](#) to decide whether you need to complete an EqIA for your activity and read the [EqIA guidance](#).

The term “activities” is used by the Council to mean a range of things, such as policies, projects, functions, services, staff restructures, major developments or planning applications.

Most significant activities that affect Council stakeholders will require an EqIA when they are in the planning stage. Many will also require an EqIA to monitor their impact on equality over time or if there is a significant change that prompts a review, such as in local demographics.

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard¹ to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;
- promote equality of opportunity between those who share a protected characteristic and those who don’t; and
- promote good relations between people who share a protected characteristic and those who don’t.

The way that we demonstrate that we have due regard for these three aims, and therefore that we are complying with the public sector equality duty, is by undertaking an EqIA.

EqIAs will almost certainly be required when a new activity affecting people who share the protected characteristics is being developed and when reviewing or changing such activities.

They will also be likely required before and during any staff re-organisations.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities such as services and projects should also be regularly reviewed for their impact.

An EqIA should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated. You can indicate the version of the EqIA below.

For more complex enquiries on EqIAs, in the first instance please contact equalities@camden.gov.uk where you will be able to receive dedicated support.

EqIAs should be signed off by the relevant sponsor, director or Head of Service.

¹ [Due regard](#) is a legal requirement and means that decision makers have to consider the equality implications of a proposal before a commissioning or policy decision has been made that may affect people who share each of the protected characteristics. Paying ‘due regard’ means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

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Title of the activity	
Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) and flexible commercial/bar (Class E/sui generis) space at 2 Waterhouse Square including external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works	
Officer accountable for the EqIA (e.g. director or project sponsor)	
Full name:	Bethany Cullen
Position:	Head of Development Management
Directorate:	Supporting Communities
Email:	bethany.cullen@camden.gov.uk
Lead person completing the EqIA (author)	
Full name:	Christopher Smith
Position:	Principal Planning Officer
Directorate:	Supporting Communities
Email:	christopher.smith1@camden.gov.uk
Person reviewing the EqIA (reviewer)	
Full name:	Aidan Brookes
Position:	Principal Lawyer
Directorate:	Corporate Services
Email:	aidan.brookes@camden.gov.uk
Version number and date of update	
1	

Step 1: Clarifying aims

1.a Is it a new activity or one that is under review or being changed?

- ☒ New
☐ Under review
☐ Being changed

1.b. Which groups are affected by this activity?

- ☐ Staff
☒ Residents
☐ Contractors
☒ Other (please detail): St Mungo's homeless charity

1.c Which Directorate does the activity fall under:

- ☐ Supporting People
☒ Supporting Communities
☐ Corporate Services
☐ More than one Directorate. Please specify:

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Camden Council Equality Impact Assessment Form

1.d Outline the aims/objectives/scope of the activity. (You should aim for a summary, rather than copying large amounts of text from elsewhere.)

Planning permission is sought for a commercial development for partial demolition of the existing building to provide additional Class E floor space intended for use as offices and retail space. In total, the application proposes 29,853sqm of non-residential floorspace which includes an overall floorspace uplift of 627sqm.

The existing seven storey building would be partially demolished and its façade replaced. The existing atrium would be removed, with a new glass roof installed to allow light to penetrate into the re-instated historic courtyard below. The development would provide a modernised seven storey building that is greater in height than the existing by a maximum of 4 metres. The development would have contemporary architecture that responds to the historic fabric of Waterhouse Square and which provides highly sustainable and flexible internal accommodation with an active public realm.

The development would include two new pedestrian access points within the external Waterhouse Square building fabric, one to the northern side of the easternmost new commercial unit and another directly from Leather Lane into the Waterhouse Square courtyard via existing access corridors.

Continue on next page if more space is needed.

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Step 2: Data and evidence

What data do you have about the people affected by the activity, for example those who use a service? Where did you get that data from (existing data gathered generally) or have you gone out and got it and what does it say about the protected characteristics and the other characteristics about which the council is interested?

Is there currently any evidence of discrimination or disadvantage to the groups?

What will the impact of the changes be?

You should try to identify any data and/or evidence about people who have a **combination, or intersection, of two or more characteristics**. For example, homeless women, older disabled people or young Black men.

2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- ☐ Age
- ☐ Disability, including family carers²
- ☐ Gender reassignment³
- ☐ Marriage and civil partnership
- ☐ Pregnancy and maternity
- ☐ Race
- ☐ Religion or belief
- ☐ Sex
- ☐ Sexual orientation

Age

The Office for National Statistics (ONS) identifies that the median age of people identified as homeless in England and Wales is 8 years younger than the rest of the population, and that over half of homeless people were between 15 and 34 years of age.

Specifically relating to St Mungo's, the 40 guests staying at the lodge on 18th January 2024 were between the ages of mid-30s to late 70s.

The English Housing Survey (ENS) identifies that social renters (53 years of age) were older on average than private renters (41 years) but younger than owner occupiers (57 years).

² This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

³ This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

Camden Council Equality Impact Assessment Form

Disability, including family carers

The ONS identifies that approximately 44% homeless people are disabled, which is more than double the percentage (17.5%) for the rest of the population.

Over half (54%) of social rented households had a household member with a long-term illness or disability, according to the ENS. Disability was more prevalent among social renters (54%) than owner occupiers (30%) or private renters (30%).

Gender reassignment

No relevant information is available.

Marriage and civil partnership

Most people (82.8%) that identified as homeless reported never being married or registered in a civil partnership. The percentage of people identified as homeless who were married (5.4%) was much lower than the rate in the rest of the England and Wales population (44.4%).

Pregnancy and maternity

No relevant information is available.

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Race

A smaller percentage of people identified as homeless in Census 2021 identified within the "White" ethnic group (67.0%), compared with 81.7% in the rest of the England and Wales population. Concurrently, a larger proportion of people identified as homeless identified within the "Black, Black British, Black Welsh, Caribbean or African" (15.0%), "Mixed or Multiple ethnic groups" (5.1%), or "Other ethnic group" (6.1%) high-level categories, when compared with the rest of the population of England and Wales (4.0%, 2.9%, and 2.1%, respectively).

The majority of households in the social rented sector identify as white. Households identifying as ethnic minorities were more prevalent among social renters (19%) than owner occupiers, according to the ENS. Social renters are more likely to identify as black (9%).

Religion or belief

People identified as homeless are more likely to have no religion (45.9%) or to be Muslim (10.9%) than they are compared to the same groups in the general population (37.2% and 6.5% respectively). They are significantly less likely to be Christian (28.4% compared to 46.2% in the general population). Figures for other religions demonstrate insignificant differences between the statistics for the homeless and wider populations.

Over half of social renters (51%) identify as Christian, which is higher than the proportion of private renters (43%) and lower than the proportion of owner occupiers (55%). 39% identify as having no religion and 6% identify as Muslim. Other religions account for less than 3% of social renters, according to the ENS.

Sex

Of all people identified as homeless, around two-thirds were male and one-third were female (67.1% males compared with 32.9% females). The percentage of males identified as homeless was higher than the rest of the population of England and Wales, but lower than females (49.0% males compared with 51.0% females).

Specifically relating to St Mungo's, the 40 guests staying at the lodge on 18th January 2024 included 38 men and 2 women.

Social renters are more likely to identify as female (57%) than male, according to the ENS.

Sexual orientation

Of people identified as homeless, more than double identified as lesbian, gay, bisexual, or "other" (LGB+) (7.7%) than in the rest of the population of England and Wales (3.2%).

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Intersectional Groups

The information available regarding homelessness and social housing, and also relating to protected characteristics, is not comprehensive enough to identify the intersection between specific groups.

2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- ☐ Foster carers
- ☐ Looked after children/care leavers
- ☐ Low-income households
- ☐ Refugees and asylum seekers
- ☐ Parents (of any gender, with children aged under 18)
- ☐ People who are homeless
- ☐ Private rental tenants in deprived areas
- ☐ Single parent households
- ☐ Social housing tenants
- ☐ Any other, please specify

Foster carers

Relevant data not available.

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Looked after children/care leavers

Figures from the Department of Levelling Up, Housing and Communities (DLUHC) show the number of 18-20 year old care leaver households in England facing homelessness has risen from 2,790 in 2018-19 to 3,710 (33% increase) in 2022-23. This is greater than the number of households facing homelessness in the general population which has risen by 11% over the same period, from 269,510 to 298,430.

Low-income households

Relevant data not available, although it is assumed given the nature of homelessness regarding lack of ability to afford residential accommodation that a very large proportion of homeless people are, or are from, low-income households.

Rates of full-time employment were lower for social renters (29%) than for owners (52%) and private renters (62%) according to the ENS. The ENS also categorises 87% of social renters as being either 'financially stretched' or in 'urban adversity'.

Refugees and asylum seekers

Relevant data not available.

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Parents (of any gender, with children aged under 18)

Relevant data not available relating to homelessness.

The ENS identifies that 31% of social rented households had dependent children, which is similar to the proportion of private renters (31%) and greater than the proportion of owner occupiers (24%).

People who are homeless

St Mungo's is a homelessness charity that has been in operation for over 50 years. The site on Brooke's Market provides temporary housing for those who would otherwise be homeless. Both long and short term residents are provided accommodation. The length of stay of individual residents can vary. The building includes rooms for individual habitation as well as communal spaces and administrative areas for staff. All of the data provided in section 2a relates to homeless individuals and groups.

Private rental tenants in deprived areas

The lower super output area (LSOA) within which the application site and St Mungo's are both located is one of the 20% most deprived within England, according to the Index of Multiple Deprivation statistics (MGCLG 2019). This is the only deprived area within the Holborn and Covent Garden Ward. 49% of properties in this ward are privately rented (data from 2020).

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Single parent households

Camden Council data shows that within the Holborn and Covent Garden ward the percentage of households that are single parent households is 10% (data from 2020). This is lower than the London and UK averages (19.9% and 14.9% respectively).

Among social renters, the ENS identifies that the most common household type was single person households (43%), followed by lone parents with dependent children (18%). Lone parent households were more common among social renters than owners (3%) and private renters (12%).

Social housing tenants

In Camden the percentage of households in the social rented sector is 34.9% (2021).

Any other, please specify

N/A

Camden Council Equality Impact Assessment Form

2.c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.

The available data focuses on single characteristics and not intersectionality. There is no specific protected characteristic that is at particular risk of homelessness according to the available data and articles/studies that have been reviewed. Homelessness can affect anyone regardless of their protected characteristics. As such, it is considered that there is no relevant data available on which to base assumptions relating to intersectionality, other than that already referenced relating to homelessness in sections 2a and 2b.

Data is available comparing the characteristics of occupiers of social housing against the occupiers of other housing types, however again this lacks sufficient detail through which to successfully analyse intersectionality.

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Step 3: Impact

Given the evidence listed in step 2, consider and describe what potential **positive and negative impacts** this work could have on people, related to their **protected characteristics** and the **other characteristics** about which the Council is interested.

Make sure you think about all three aims of the public sector equality duty. Have you identified any actual or potential discrimination against one or more groups? How could you have a positive impact on advancing equality of opportunity for a particular group? Are there opportunities within the activity to promote "good relations" – a better understanding or relationship between people who share a protected characteristic and others?

3.a Potential negative impact on protected characteristics

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Age	No	There could be some loss of accessibility on local streets during the course of the construction process, affecting general and emergency access to St Mungo's and social housing in the local area, as well as more general impacts from construction including temporary issues regarding noise, dust, and other construction-related pollution.
Disability including carers	Yes	There could be some loss of accessibility on local streets during the course of the construction process, affecting general and emergency access to St Mungo's and social housing in the local area, as well as more general impacts from construction including temporary issues regarding noise, dust, and other construction-related pollution.
Gender reassignment	No	No impacts specifically related to those with the gender reassignment protected characteristic are anticipated.
Marriage/civil partnership	No	No impacts specifically related to those with the marriage/civil partnership protected characteristic are anticipated.

Camden Council Equality Impact Assessment Form

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Pregnancy/ maternity	Yes	There could be some loss of accessibility on local streets during the course of the construction process, affecting general and emergency access to St Mungo's and social housing in the local area, as well as more general impacts from construction including temporary issues regarding noise, dust, and other construction-related pollution.
Race	No	There could be some loss of accessibility on local streets during the course of the construction process, affecting general and emergency access to St Mungo's and social housing in the local area, as well as more general impacts from construction including temporary issues regarding noise, dust, and other construction-related pollution.
Religion or belief	No	There could be some loss of accessibility on local streets during the course of the construction process, affecting general and emergency access to St Mungo's and social housing in the local area, as well as more general impacts from construction including temporary issues regarding noise, dust, and other construction-related pollution.
Sex	No	There could be some loss of accessibility on local streets during the course of the construction process, affecting general and emergency access to St Mungo's and social housing in the local area, as well as more general impacts from construction including temporary issues regarding noise, dust, and other construction-related pollution.
Sexual orientation	No	There could be some loss of accessibility on local streets during the course of the construction process, affecting general and emergency access to St Mungo's and social housing in the local area, as well as more general impacts from construction including temporary issues regarding noise, dust, and other construction-related pollution.

Camden Council Equality Impact Assessment Form

3.b Potential positive impact on protected characteristics

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	The development would include new office and retail space and would provide new job opportunities for the local community, and in particular for younger people with lower levels of qualifications and experience that are more at risk of homelessness, including through jobs in the construction process and apprenticeships. Access to affordable housing in the borough would also increase thanks to the affordable housing contribution.
Disability including carers	Yes	The development would provide new retail space with accessible thresholds for use by disabled people. The general accessibility throughout the new building would be significantly improved, for example through new lifts and level thresholds. Access to affordable housing in the borough would also increase thanks to the affordable housing contribution.
Gender reassignment	Yes	Relevant data regarding gender identity and homelessness not available. However, the new office and retail development would provide the same increased access to retail facilities and job opportunities as the wider population and as such there is an overall benefit. Access to affordable housing in the borough would also increase thanks to the affordable housing contribution.
Marriage/civil partnership	Yes	Homeless individuals are more likely to be single and the new office and retail development would allow unmarried individuals to benefit from the same increased access to retail facilities and job opportunities as the wider population, as well as an increased access to affordable housing in the borough thanks to the affordable housing contribution.

Camden Council Equality Impact Assessment Form

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Pregnancy/ maternity	Yes	It is considered that persons who are pregnant or who have very young children as they would benefit from the same increased access to retail facilities and job opportunities and affordable housing from the development as the wider population.
Race	Yes	The new office and retail development would allow people whatever their race to benefit from the same increased access to retail facilities and job opportunities, and increased affordable housing in the borough provided through the financial contribution.
Religion or belief	Yes	The new office and retail development would allow people whatever their religion to benefit from the same increased access to retail facilities and job opportunities, as well as a generally increased access to affordable housing as the result of the financial contribution secured from this development.
Sex	Yes	The new office and retail development would allow people whatever their sex to benefit from the same increased access to retail facilities and job opportunities, as well as increased access to affordable housing as the result of the financial contribution secured from this development.

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Sexual orientation	Yes	The new office and retail development would allow people whatever their sexual orientation to benefit from the same increased access to retail facilities and job opportunities, as well as increased access to affordable housing as the result of the financial contribution secured from this development.

3.c Potential negative impact on other characteristics

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Foster carers	No	It is considered that the new office and retail development would not negatively impact foster carers as they would benefit from the same increased access to retail facilities and job opportunities, plus increased provision of affordable housing, as the wider population.
Looked after children/care leavers	No	It is considered that the new office and retail development would not negatively impact looked after children and care leavers as they would benefit from the same increased access to retail facilities and job opportunities as the wider population as well as improved access to affordable housing in the borough as the result of the financial contribution secured as part of this application.

Camden Council Equality Impact Assessment Form

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Low-income households	No	It is considered that the new office and retail development would not negatively impact low income households as they would benefit from the same increased access to retail facilities and job opportunities as the wider population. Low income families would benefit from greater access to apprenticeships as well as greater provision of affordable housing in the borough as the result of the financial contribution secured as part of this development.
Refugees and asylum seekers	No	It is considered that the new office and retail development would not negatively impact refugees and asylum seekers as they would benefit from the same increased access to retail facilities and job opportunities as the wider population. Refugees and asylum seekers would benefit from greater provision of affordable housing in the borough as the result of the financial contribution secured as part of this development.
Parents (of any gender, with children aged under 18)	No	It is considered that the new office and retail development would not negatively impact parents as they would benefit from the same increased access to retail facilities and job opportunities as the wider population, as well as from the greater provision of affordable housing in the borough as the result of the financial contribution secured as part of this development.

Camden Council Equality Impact Assessment Form

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
People who are homeless	Yes	St Mungo's is a homelessness charity that has been in operation for over 50 years and which is located opposite the development site across Brooke's Market. Residents of this building could be considered vulnerable for a range of reasons including increased likelihood of mental health issues, drug and alcohol dependency, and other issues. The building would be more than 30 metres from the development site. The development could impact on the building in terms of a loss of sun and daylight. The loss of daylight would be within acceptable limits and the levels of sunlight would continue to be good. Increases in noise levels from use of surrounding streets and from the retail and office accommodation and related terraces could
Private rental tenants in deprived areas	No	It is considered that the new office and retail development would not negatively impact local private renters as they would benefit from the same increased access to retail facilities and job opportunities as the wider population. Private renters would also benefit from greater provision of housing in the borough as the result of the financial contribution secured as part of this development, which would contribute to reducing demand for housing overall.
Single parent households	No	It is considered that the new office and retail development would not negatively impact single parent households as they would benefit from the same increased access to retail facilities and job opportunities as the wider population. Single parent households would also benefit from a greater provision of affordable housing in the borough as the result of the financial contribution secured as part of this development.

Camden Council Equality Impact Assessment Form

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Social housing tenants	No	It is considered that the new office and retail development would not negatively impact social housing tenants as they would benefit from the same increased access to retail facilities and job opportunities as the wider population. Social housing tenants would also benefit from greater provision of affordable housing in the borough as the result of the financial contribution secured as part of this development
Any other, please specify	N/A	N/A

Camden Council Equality Impact Assessment Form

3.d Potential positive impact on other characteristics

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Foster carers	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.
Looked after children/care leavers	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.
Low-income households	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.

Camden Council Equality Impact Assessment Form

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Refugees and asylum seekers	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.
Parents (of any gender, with children aged under 18)	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.
People who are homeless	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Private rental tenants in deprived areas	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.
Single parent households	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.
Social housing tenants	Yes	Increased access to retail facilities and job opportunities as the wider population, as well as affordable housing through the financial contribution secured as part of this development.
Any other, please specify	N/A	N/A

Camden Council Equality Impact Assessment Form

3.e Consider intersectionality.⁴ Given the evidence listed in step 2, consider and describe any potential positive and negative impacts this activity could have on people who have a combination, or intersection, of two or more characteristics. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

The available data focuses on single characteristics and not intersectionality. there is no specific protected characteristic that is at particular risk of homelessness according to the available data and articles/studies that have been reviewed. Homelessness can affect anyone regardless of their protected characteristics. As such, it is considered that there is no relevant data available on which to base assumptions relating to intersectionality, other than that already referenced relating to homelessness in sections 3a and 3b.

⁴ Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

Camden Council Equality Impact Assessment Form

Step 4: Engagement - co-production, involvement or consultation with those affected

4.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁵	If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?
St Mungo's	- potential vulnerability of residents who have a history of rough sleeping - 38 men and 2 women staying at the site currently - age range from mid-30s to late 70s - residents like neighbouring square at Brooke's Market but it has a history of attracting anti-social behaviour - only one person supporting 40 residents at weekends can lead to additional risks during this period (security of local streets will be improved from the development through passive surveillance and security related to the new office) - impact from contractors parking (no parking in local streets will be permitted other than relating to construction works which are
Malcom Cox (residents liaison contact)	- light pollution to St Mungo's and residents (any increase in light emissions from the building would be within acceptable limits) - uses are to include a bar (this has since been removed from the proposals) - loss of natural light to some rooms (any loss of light would be within acceptable limits) - construction works management (construction works are to be controlled and managed through planning obligations and contributions) - emergency service access arrangements (construction works are to be controlled and managed through planning obligations and contributions)

⁵ This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

Camden Council Equality Impact Assessment Form

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁶	If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?

Camden Council Equality Impact Assessment Form

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁶	If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?

Camden Council Equality Impact Assessment Form

4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

The Planning Department has engaged with the applicant to minimise the potential impact. A bar that was proposed as part of the application has been removed from the plans (prior to the writing of this report). Further measures such as provision of security measures, controls of hours and types of use, and improvements to public realm areas would be controlled by conditions attached to the planning permission, should it be given a resolution to grant by the planning permission. The applicant has re-assessed day and sunlight impact and it has been confirmed that the potential impacts would be within acceptable limits. Further controls, via s106 legal agreement, would be secured to manage construction works and also to secure a payment for the provision of affordable housing off-site which would provide significant benefits in terms of improving access to affordable housing for the local community.

Camden Council Equality Impact Assessment Form

Step 5: Informed decision-making

5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqlAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.	Minor negative impacts to people with a disability, those with pregnancy/maternity considerations and people who are homeless has been identified. Other temporary disturbances from construction works would also occur. These impacts would typically be managed through a construction management plan which will mitigate negative impacts during construction where possible, including ensuring access for emergency vehicles to all local properties at all times. Construction works are considered to be a temporary nuisance that can be adequately controlled by relevant clauses secured through a section 106 legal agreement. Further s106 clauses have also been secured through this development including a construction working group that ensures liaison with local residents and a construction impact bond and construction implementation contributions that secures closer monitoring and management of a construction management plan
2. Continue the work as it is because no potential negative impacts have been found	

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3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)	
4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact	

Camden Council Equality Impact Assessment Form

Step 6: Action planning

6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

Action	Due	Owner
The completed development would not require any mitigation but steps will be taken to address potential impacts on St Mungo's and local residents during the construction process through	On publication of planning permission (early 2024)	Christopher Smith (Principal Planning Officer)

Camden Council Equality Impact Assessment Form

[illegible]

Camden Council Equality Impact Assessment Form

Step 7: EqlA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqlA and ask them to review the EqlA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqlA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at equalities@camden.gov.uk

Camden Council Equality Impact Assessment Form

Step 8: Sign-off

EqlA author	Name Job title Date	CHRISTOPHER SMITH PRINCIPAL PLANNER 5/2/2024
EqlA advisor / reviewer	Name Job title Date	AIDAN BROOKES PRINCIPAL LAWYER 5/2/2024
Senior accountable officer	Name Job title Date	BETHANY CULLEN HEAD OF DEVELOPMENT MANAGEMENT 5/2/2024

Appendix 2 – Addendum Daylight and Sunlight Report

NB: a full set of appendices for this addendum day/sunlight report are available to view online.

Camden Regeneration and Planning Department
5 Pancras Square
London
N1C 4AG

FAO: Planning Officer Christopher Smith

22 January 2024



Dear Sirs

RE: PROPOSED REDEVELOPMENT OF 2 WATERHOUSE SQUARE, 140 HOLBORN, LONDON EC1N –
DAYLIGHT AND SUNLIGHT ASSESSMENTS IN RELATION TO EVELYN'S BUILDINGS, 16 BROOKES
MARKET (ALSO KNOWN AT THE LODGE AND OCCUPIED BY THE ST MUNGO'S HOMELESS CHARITY)
APPLICATION REF: 2023/3419/P

- 1.1. We are instructed by the applicant, the Prudential Assurance Company Limited, to advise on the potential daylight, sunlight and overshadowing impacts that may occur to the surrounding properties and amenity spaces as a result of the proposed redevelopment of 2 Waterhouse Square (the Proposed Development).
- 1.2. Further to our report dated 20 July 2023 and clarification letter dated 20 December 2023, we write to produce an addendum report providing further commentary and supporting information on the daylight and sunlight effects that may occur to The Lodge, 16 Brookes Market occupied by the St Mungo's Homeless Charity.
- 1.3. The daylight and sunlight impacts to The Lodge were considered in the submitted daylight and sunlight report dated 20 July 2023. Within this report the Lodge was referred to as Evelyn's Buildings, Brookes Market. Overall, the conclusions are that the impact on The Lodge will be very small and unnoticeable to the occupants, but further information is set out below.
- 1.4. The Lodge is located to the northwest corner of the Waterhouse Square. The location of the building is labelled No.8 on the plan below and street view image of the front elevation is given at Figure 2.



Figure 1: Site Plan Showing the location of The Lodge (No.8)



Figure 2: Street View of Front Elevation

RIGHTS TO LIGHT | DAYLIGHT & SUNLIGHT | DAYLIGHT DESIGN | PARTY WALL & NEIGHBOURLY MATTERS | MEASURED SURVEYING | BIM
LONDON OFFICE: 17 SLINGSBY PLACE, LONDON, WC2E 9AB | 0207 836 5828
OXFORD OFFICE: 7 OASIS PARK, EYNHAM, OXFORD, OX29 4TP | 01865 881 882

point2.co.uk

Point 2 Surveyors Ltd. is a Limited Company with Company Registration Number 08612250

- 1.5. The Lodge is understood to be occupied by St Mungo's Charity and provides circa 40 rooms for the homeless.
- 1.6. We have found partial floor plans for the building, which when coupled with our external observations indicated that there are communal areas such as offices and a dining room on the ground floor, a sitting room and some bedrooms on the first floor and further bedrooms on the second, third, fourth and fifth floors. Images of the floor plans found are given below.

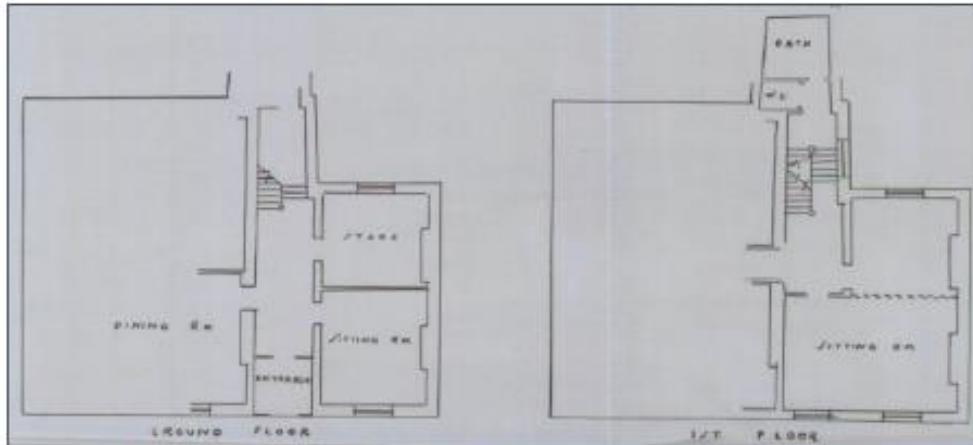


Figure 3: Partial Floor Plans for Ground and First Floors

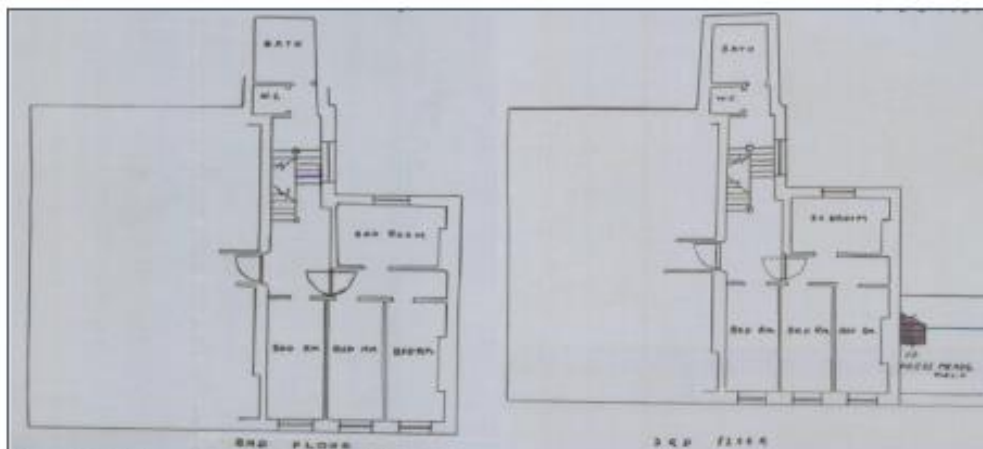


Figure 4: Partial Floor Plans for Second and Third Floors

- 1.7. Given the use of the property, and as the bedrooms are likely to be the only personal space the occupants have, the building is considered to be sensitive to any daylight and sunlight effects. We have therefore assessed The Lodge as if it was a residential building in accordance with the BRE guidelines and considered the impact on each bedroom as if it were a living room given the multiple occupancies of the building.



Figure 5: Partial Floor Plans for Fourth and Fifth Floors

- 1.8. Whilst it could be argued that the office areas on the ground floor (evident from external observation) do not need to be assessed, it is recognised that the plans show that the space could be a communal sitting room. All windows to the building have therefore been assessed except for those to the entrance hallway and the staircase windows on the 4th and 5th floors to the eastern side of the building. These windows are highlighted in red at Figure 3 below. This assessment scope is in accordance with the BRE guidelines.

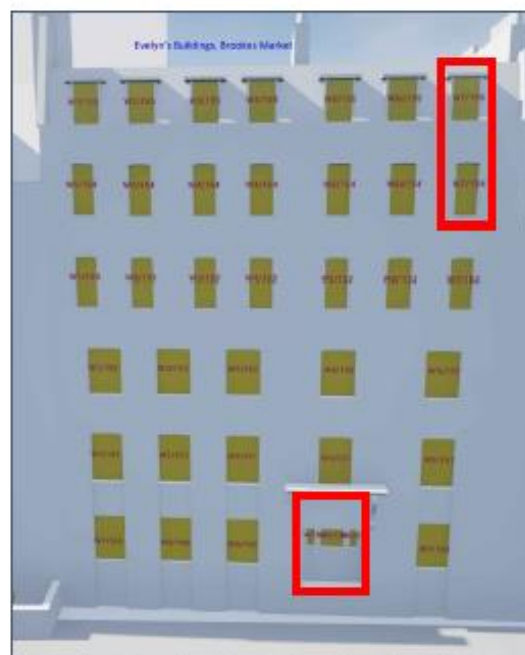


Figure 6: Front Elevation of The Lodge showing the windows in red that were excluded from the assessment as they are understood to serve non-habitable rooms.

Daylight Assessment Results

- 1.9. In accordance with the BRE guidelines, two daylight tests have been run, the Vertical Sky Component (VSC) test and the No-Sky Line (NSL) test. The NSL test is often regarded as secondary to the VSC test as the NSL results can often be misleading as to the actual effect that may be experienced by an occupant.
- 1.10. The VSC test results show that the maximum percentage reduction as a result of the Proposed Development is 7.31%. As the BRE guidelines suggest that a percentage reduction of up to 20% is unlikely to be noticeable to the occupants, we can be confident to conclude that a percentage reduction of 7.31% or less will create an unnoticeable effect on the building's amenity. A copy of the VSC results is enclosed.
- 1.11. The second daylight test is known as the No-Sky Line (NSL) test. This test considers how the available daylight (measured at the window using the VSC tests) is likely to be distributed within the room. A copy of the NSL results in tabular form, and on plan, are enclosed.
- 1.12. The NSL results show that all rooms except for 7 bedrooms on the third floor (3 bedrooms) and fourth floors (4 bedrooms) will experience percentage reductions within the BRE guidelines. A summary of the NSL and VSC results for these 7 rooms, along the retained percentage NSL area and VSC is as follows:

Floor Level	Room Label	Room Use	% Loss of NSL	Retained NSL Area	% Loss of VSC	Retained VSC
Third	R2/153	BEDROOM	24.6	55%	6.49	26.93%
Third	R3/153	BEDROOM	24.9	55%	6.65	26.81%
Third	R4/153	BEDROOM	24.2	62%	6.71	26.68%
Fourth	R2/154	BEDROOM	28.8	67%	6.24	28.87%
Fourth	R3/154	BEDROOM	28.6	66%	6.44	28.76%
Fourth	R4/154	BEDROOM	20.3	75%	6.52	28.66%
Fourth	R5/154	BEDROOM	20.6	77%	6.54	28.60%

Figure 7: Summary of the No-Sky Line and Vertical Sky Component tests to the 7 rooms that experience reductions beyond the BRE guidelines.

- 1.13. As can be seen from the table above, the percentage reductions in NSL to the 7 rooms that experience reductions beyond the BRE guidelines are between 20.3% and 28.8%. As the results are within 30%, the significance of these effects (when considered in isolation) would be considered minor adverse. When considering if these minor adverse effects can be considered acceptable, consideration of the retained NSL values and the VSC results needs to be given before conclusions can be drawn.
- 1.14. The retained No-Sky Line levels are well above what is typically found across central London (which we consider to be around 50%). In addition, the NSL contour plots show that a good proportion of the room in front of the window will be able to continue to receive some direct daylight.
- 1.15. The VSC results show that the maximum percentage reduction to these 7 rooms is 6.71% which is well within the BRE guidelines recommendations. In addition, the retained levels of VSC are very close to, or above, 27% which is recommended in the BRE guidelines. These levels of

daylight are usually found in sub-urban areas and therefore considered a very good level of retained daylight for an urban area.

- 1.16. Overall, whilst the NSL results in isolation suggest that 7 rooms may experience a minor adverse effect, the overall effect to each room when considering the retained NSL levels and VSC results is not considered to be material.

Sunlight

The sunlight tests show the effects are within the BRE guidelines criteria. The results also show that each room will retain a very good level of sunlight with the proposed development in place. For example, the lowest total retained sunlight result is 52% APSH (Annual Probable Sunlight Hours) which is more than double that recommended by the BRE guidelines (which is 25% APSH). A copy of the APSH results is enclosed.

Conclusions

In conclusion and based on the calculations undertaken, we can conclude that the daylight and sunlight amenity impact on The Lodge will be very small and unnoticeable to the occupants.

Yours faithfully



Andrew Cartmell
Senior Director

a.cartmell@point2.co.uk 0771 943 6698



Appendix 3 – Minutes from meeting between applicant and St Mungo's



CO-RE – 2 WATERHOUSE SQUARE
ST MUNGO'S MEETING
24 JANUARY 2024

Meeting date:
Thursday 18 January 2024 at 2.30pm

Meeting place:
The Lodge at St Ursula's, Brooke Street, EC1N 7RB

Attendees: REDACTED

(SD) began by explaining that he has very little knowledge of the planning relating to this site and that his main concerns are for very vulnerable guests and the potential for any new drinking establishments.

He explained that residents at St Mungo's have a history of rough sleeping and non-engagement along with addictions and mental health issues. He said that the ethos of the Lodge is to keep people off the streets in warm beds in the service and link them with other services. He explained that some guests stay for long periods and others are gone relatively quickly.

SD then gave a breakdown of guests currently staying at the Lodge – 38 men and 2 women ranging in age from mid-30's to late 70's. He said that guests are very proud of the Lodge.

(MC) explained that he acts as a liaison between local residents and the Lodge and that a lot of hard work has been undertaken over the years to make it work well between the Lodge, its guests and the local community.

(SW) then ran through a presentation of the proposals – copies of this presentation were left with SD and colleagues.

Following the presentation, SD commented that the area is generally very quiet and that the proposed new entrance on Greville Street / Leather Lane may change the volume of people in the area. Once SD had properly orientated himself, he realised he had mistaken where the entrance is proposed for and that this would not actually have much if any impact.

MC said that there is sensitivity in traffic going through the square and that while residents like it, it attracts gangs because it is quiet and there are five entrances which can be used as a means of escape. He said he is worried that disturbing the status quo could cause concerns. He said it's what happens on weekends and at night that causes the difference. SD added that at night and weekends

there is only one person at the Lodge supporting the 40 guests which is worrying for the safety of residents and staff.

SW and the team explained that the proposals will include improved security and surveillance as well as natural surveillance.

MC brought up light pollution from the proposed glazed part of the building and SD said that parking is a nightmare and it causes issues when they have contractors coming to do repairs. SW said that no vehicles associated with the building would be parking on the streets.

SD said that existing public realm is not very nice and that it would be lovely for this to be improved with some trees included.

The volunteer in attendance asked about noisy works and timings. The team explained that noisy works will be subject to two hours on, two hours off in a number of slots throughout the day and restricted to taking place between 8.30am and 5pm from Monday to Friday (excluding Bank Holidays). If works are required outside these times, the contractor will need to apply for a special license which is subject to Camden Council's approval.

MC said that there are three main areas of concern. These being:

1. The potential for a bar(s) – citing that the terrace of the Argyle Pub is controversial locally and they do not want any more of that type of thing
2. The potential loss of natural light with some rooms impacted more than others
3. How contractors and lorries are managed with a focus on keeping access for emergency services.

(AN) explained that there is one single unit that could potentially be a bar but that would still need licensing. He also said that there hasn't been a decision on whether the team want this to be a bar but that the intention is to apply for a flexible use for the particular unit.

He explained on daylight and sunlight that there was some confusion at committee regarding whether the Lodge had been assessed. He said that it had been assessed under the name of the Evelyn Buildings and treated as 'residential' with all findings within BRE guidelines. (DH) added that any impact would be below the guidelines of perceptibility.

The team explained that there will be condensed report produced outlining this and that the intention is to share this with the Lodge, LBC officers and Planning Committee members when ready. *This has now been shared with the Lodge.*

On construction impact, AN explained that the team has put forward what they believe could be good solutions but that it will be impossible to discuss in full detail until a contractor is in board and that it will need to go through a consultation and sign off process. (DJH) added that the team would consult the local community on a detailed draft of the Construction Management Plan (CMP) once it is ready. DH said that while the team will be meeting regularly with the community, we would also be happy to facilitate separate and regular meetings with the Lodge to address and mitigate any specific concerns they might have.

MC said that there are also concerns coming from the use of the proposed terraces. AN explained that these will be conditioned and team agreed to follow up with what those conditioned hours are likely to

be. This has now been shared with the Lodge and the proposed hours for the external terraces is that they shall not be used outside of 8am-9pm Mondays to Saturdays.

The meeting was brought to a close and DJH said that the team very much sees this as the start of many conversations going forward and that if there is anybody else at the Lodge or St Mungo's more generally who would like to discuss the proposals with us, we would be happy to do so.

END

Appendix 4A – Officer Report to 14th December Committee (Updated with information amended through supplementary report and late tabled paper)

Address:	2 Waterhouse Square 140 Holborn London EC1N 2ST		1
Application Numbers:	2023/3419/P	Officer: Christopher Smith	
Ward:	Holborn & Covent Garden		
Date Received:	04/08/2023		
Proposal (planning application): Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) and flexible commercial/bar (Class E/sui generis) space at 2 Waterhouse Square including external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.			
Existing Plans and Drawings (all Rev. C01 unless specified): WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan WHS-ORM-2W-04-DR-A-12504 Existing General Arrangement Fourth Floor Plan WHS-ORM-2W-05-DR-A-12505 Existing General Arrangement Fifth Floor Plan WHS-ORM-2W-06-DR-A-12506 Existing General Arrangement Sixth Floor Plan			

WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan

WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A

WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan

WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B

WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C

WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D

WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation

WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E

WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan

WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation

WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation

WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation

Proposed Plans and Drawings (all Rev. C01 unless specified):

WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan

WHS-ORM-2W-00-DR-A-12600 (Rev. C02) Proposed Demolition Ground Floor Plan

WHS-ORM-2W-00-DR-A-12700 (Rev. C04) Proposed General Arrangement Ground Floor Plan

WHS-ORM-2W-01-DR-A-12601 Proposed Demolition First Floor Plan

WHS-ORM-2W-01-DR-A-12701 (Rev. C02) Proposed General Arrangement First Floor Plan

WHS-ORM-2W-02-DR-A-12602 Proposed Demolition Second Floor Plan

WHS-ORM-2W-02-DR-A-12702 (Rev. C02) Proposed General Arrangement Second Floor Plan

WHS-ORM-2W-03-DR-A-12603 Proposed Demolition Third Floor Plan

WHS-ORM-2W-03-DR-A-12703 (Rev. C02) Proposed General Arrangement Third Floor Plan

WHS-ORM-2W-04-DR-A-12604 Proposed Demolition Fourth Floor Plan

WHS-ORM-2W-04-DR-A-12704 (Rev. C02) Proposed General Arrangement Fourth Floor Plan

WHS-ORM-2W-05-DR-A-12605 Proposed Demolition Fifth Floor Plan

WHS-ORM-2W-05-DR-A-12705 (Rev. C02) Proposed General Arrangement Fifth Floor Plan

WHS-ORM-2W-06-DR-A-12606 Proposed Demolition Sixth Floor Plan

WHS-ORM-2W-06-DR-A-12706 (Rev. C02) Proposed General Arrangement Sixth Floor Plan

WHS-ORM-2W-07-DR-A-12707 (Rev. C02) Proposed General Arrangement Seventh Floor Plan

WHS-ORM-2W-AA-DR-A-12140 Proposed Planning Section A-A

WHS-ORM-2W-B1-DR-A-12699 Proposed Demolition Basement 1 Plan

WHS-ORM-2W-B1-DR-A-12799 (Rev. C02) Proposed General Arrangement Basement 1 Plan

WHS-ORM-2W-BB-DR-A-12141 Proposed Planning Section B-B

WHS-ORM-2W-CC-DR-A-12142 Proposed Planning Section C-C

WHS-ORM-2W-DD-DR-A-12143 Proposed Planning Section D-D

WHS-ORM-2W-EA-DR-A-12349 Proposed Planning Bay Study 10

WHS-ORM-2W-EA-DR-A-12350 Proposed Planning Bay Study 11

WHS-ORM-2W-EA-DR-A-12351 Proposed Planning Bay Study 12

WHS-ORM-2W-EA-DR-A-12352 Proposed Planning Bay Study 13

WHS-ORM-2W-EA-DR-A-12372 (Rev. C02) Proposed Planning R7 Heritage Block East Facade

WHS-ORM-2W-EE-DR-A-12144 Proposed Planning Section E-E

WHS-ORM-2W-LG-DR-A-12698 Proposed Demolition Lower Ground Floor Plan

WHS-ORM-2W-LG-DR-A-12798 (Rev. C02) Proposed General Arrangement Lower Ground Floor Plan

WHS-ORM-2W-NO-DR-A-12330 Proposed Planning North Elevation

WHS-ORM-2W-NO-DR-A-12331 (Rev. C03) Proposed Planning East Elevation

WHS-ORM-2W-NO-DR-A-12340 Proposed Planning Bay Study 01

WHS-ORM-2W-NO-DR-A-12341 Proposed Planning Bay Study 02

WHS-ORM-2W-NO-DR-A-12342 Proposed Planning Bay Study 03

WHS-ORM-2W-NO-DR-A-12343 Proposed Planning Bay Study 04

WHS-ORM-2W-NO-DR-A-12344 Proposed Planning Bay Study 05

WHS-ORM-2W-NO-DR-A-12345 Proposed Planning Bay Study 06

WHS-ORM-2W-NO-DR-A-12346 Proposed Planning Bay Study 07

WHS-ORM-2W-NO-DR-A-12347 Proposed Planning Bay Study 08

WHS-ORM-2W-NO-DR-A-12348 Proposed Planning Bay Study 09

WHS-ORM-2W-NO-DR-A-12371 Proposed Planning R7 Heritage Block North Facade

WHS-ORM-2W-RF-DR-A-12607 Proposed Demolition Roof Plan

WHS-ORM-2W-SO-DR-A-12332 Proposed Planning South Elevation

WHS-ORM-2W-SO-DR-A-12353 Proposed Planning Bay Study 14

WHS-ORM-2W-SO-DR-A-12370 Proposed Planning R6 Heritage Block South Facade

WHS-ORM-2W-WE-DR-A-12333 Proposed Planning West Elevation

WHS-ORM-2W-WE-DR-A-12354 Proposed Planning Bay Study 15

WHS-ORM-2W-WE-DR-A-12355 Proposed Planning Bay Study 16

WHS-ORM-2W-ZZ-DR-A-12360 Proposed Planning Entrance Elevations

Supporting Documentation:

Design and Access Statement, and Townscape Assessment (July 2023)

Planning Statement (November 2023)

Planning Report (July 2023)

Noise Impact Assessment (July 2023)

Sustainability Statement (August 2023)

Daylight, Sunlight and Overshadowing Report (July 2023)

Construction/Demolition Management Plan (July 2023)

Transport Assessment (July 2023)

Heritage Assessment (July 2023)

Statement of Community Involvement (August 2023)

Operational Waste Management Strategy (July 2023)

Drainage Strategy Report (October 2023)

Air Quality Assessment (October 2023)

Active Travel Zone Assessment Technical Note (November 2023)

RECOMMENDATION SUMMARY:

Grant conditional planning permission following:

(i) Completion of Section 106 Legal Agreement.

Applicant:

Prudential Assurance Company Limited

Agent:

Gerald Eve LLP

Address:	2 Waterhouse Square 140 Holborn London EC1N 2ST		2
Application Numbers:	2023/3420/L	Officer: Christopher Smith	
Ward:	Holborn & Covent Garden		
Date Received:	04/08/2023		

Proposal (listed building consent application):

Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) space at 2 Waterhouse Square including reconfiguration of entrances and other external alterations, internal refurbishment of and alterations to the historic fabric, and other ancillary works.

Background Papers, Supporting Documents and Drawing Numbers:

Existing Plans and Drawings (all Rev. C01 unless specified):

WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan

WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan

WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan

WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan

WHS-ORM-2W-04-DR-A-12504 Existing General Arrangement Fourth Floor Plan

WHS-ORM-2W-05-DR-A-12505 Existing General Arrangement Fifth Floor Plan

WHS-ORM-2W-06-DR-A-12506 Existing General Arrangement Sixth Floor Plan

WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan

WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A

WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan

WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B

WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C

WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D

WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation

WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E

WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan

WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation

WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation

WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation

Proposed Plans and Drawings (all Rev. C01 unless specified):

WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan

WHS-ORM-2W-00-DR-A-12600 (Rev. C02) Proposed Demolition Ground Floor Plan

WHS-ORM-2W-00-DR-A-12700 (Rev. C04) Proposed General Arrangement Ground Floor Plan

WHS-ORM-2W-01-DR-A-12601 Proposed Demolition First Floor Plan

WHS-ORM-2W-01-DR-A-12701 (Rev. C02) Proposed General Arrangement First Floor Plan

WHS-ORM-2W-02-DR-A-12602 Proposed Demolition Second Floor Plan

WHS-ORM-2W-02-DR-A-12702 (Rev. C02) Proposed General Arrangement Second Floor Plan

WHS-ORM-2W-03-DR-A-12603 Proposed Demolition Third Floor Plan

WHS-ORM-2W-03-DR-A-12703 (Rev. C02) Proposed General Arrangement Third Floor Plan

WHS-ORM-2W-04-DR-A-12604 Proposed Demolition Fourth Floor Plan

WHS-ORM-2W-04-DR-A-12704 (Rev. C02) Proposed General Arrangement Fourth Floor Plan

WHS-ORM-2W-05-DR-A-12605 Proposed Demolition Fifth Floor Plan

WHS-ORM-2W-05-DR-A-12705 (Rev. C02) Proposed General Arrangement Fifth Floor Plan

WHS-ORM-2W-06-DR-A-12606 Proposed Demolition Sixth Floor Plan

WHS-ORM-2W-06-DR-A-12706 (Rev. C02) Proposed General Arrangement Sixth Floor Plan

WHS-ORM-2W-07-DR-A-12707 (Rev. C02) Proposed General Arrangement Seventh Floor Plan

WHS-ORM-2W-AA-DR-A-12140 Proposed Planning Section A-A

WHS-ORM-2W-B1-DR-A-12699 Proposed Demolition Basement 1 Plan

WHS-ORM-2W-B1-DR-A-12799 (Rev. C02) Proposed General Arrangement Basement 1 Plan

WHS-ORM-2W-BB-DR-A-12141 Proposed Planning Section B-B

WHS-ORM-2W-CC-DR-A-12142 Proposed Planning Section C-C

WHS-ORM-2W-DD-DR-A-12143 Proposed Planning Section D-D

WHS-ORM-2W-EA-DR-A-12349 Proposed Planning Bay Study 10

WHS-ORM-2W-EA-DR-A-12350 Proposed Planning Bay Study 11

WHS-ORM-2W-EA-DR-A-12351 Proposed Planning Bay Study 12

WHS-ORM-2W-EA-DR-A-12352 Proposed Planning Bay Study 13

WHS-ORM-2W-EA-DR-A-12372 (Rev. C02) Proposed Planning R7 Heritage Block East Facade

WHS-ORM-2W-EE-DR-A-12144 Proposed Planning Section E-E

WHS-ORM-2W-LG-DR-A-12698 Proposed Demolition Lower Ground Floor Plan

WHS-ORM-2W-LG-DR-A-12798 (Rev. C02) Proposed General Arrangement Lower Ground Floor Plan

WHS-ORM-2W-NO-DR-A-12330 Proposed Planning North Elevation

WHS-ORM-2W-NO-DR-A-12331 (Rev. C03) Proposed Planning East Elevation

WHS-ORM-2W-NO-DR-A-12340 Proposed Planning Bay Study 01

WHS-ORM-2W-NO-DR-A-12341 Proposed Planning Bay Study 02

WHS-ORM-2W-NO-DR-A-12342 Proposed Planning Bay Study 03

WHS-ORM-2W-NO-DR-A-12343 Proposed Planning Bay Study 04

WHS-ORM-2W-NO-DR-A-12344 Proposed Planning Bay Study 05

WHS-ORM-2W-NO-DR-A-12345 Proposed Planning Bay Study 06

WHS-ORM-2W-NO-DR-A-12346 Proposed Planning Bay Study 07

WHS-ORM-2W-NO-DR-A-12347 Proposed Planning Bay Study 08

WHS-ORM-2W-NO-DR-A-12348 Proposed Planning Bay Study 09

WHS-ORM-2W-NO-DR-A-12371 Proposed Planning R7 Heritage Block North Facade

WHS-ORM-2W-RF-DR-A-12607 Proposed Demolition Roof Plan

WHS-ORM-2W-SO-DR-A-12332 Proposed Planning South Elevation

WHS-ORM-2W-SO-DR-A-12353 Proposed Planning Bay Study 14

WHS-ORM-2W-SO-DR-A-12370 Proposed Planning R6 Heritage Block South Facade

WHS-ORM-2W-WE-DR-A-12333 Proposed Planning West Elevation

WHS-ORM-2W-WE-DR-A-12354 Proposed Planning Bay Study 15

WHS-ORM-2W-WE-DR-A-12355 Proposed Planning Bay Study 16

WHS-ORM-2W-ZZ-DR-A-12360 Proposed Planning Entrance Elevations

Supporting Documentation:

Design and Access Statement, and Townscape Assessment (July 2023)

Planning Statement (November 2023)

Planning Report (July 2023)

Noise Impact Assessment (July 2023)

Sustainability Statement (August 2023)

Daylight, Sunlight and Overshadowing Report (July 2023)

Construction/Demolition Management Plan (July 2023)

Transport Assessment (July 2023)

Heritage Assessment (July 2023)

Statement of Community Involvement (August 2023)

Operational Waste Management Strategy (July 2023)

Drainage Strategy Report (October 2023)

Air Quality Assessment (October 2023)

Active Travel Zone Assessment Technical Note (November 2023)

RECOMMENDATION SUMMARY:

Grant conditional listed building consent.

Applicant:

Prudential Assurance Company Limited

Agent:

Gerald Eve LLP

ANALYSIS INFORMATION

Land Use Details:			
	<i>Use Class</i>	<i>Use Description</i>	<i>Floorspace (GIA sqm)</i>
Existing	Class E(gi) – Offices		29,226
	EXISTING TOTAL		29,226
Proposed	Class E (Commercial, business and service use)		29,531
	Class E (Commercial, business and service use)		322
	PROPOSED TOTAL		29,853 (+627)

Parking Details:		
	Car Parking Spaces (General)	Cycle Parking Spaces
Existing	11	36
Proposed	0 (zero)	457

OFFICERS' REPORT

Reason for Referral to Committee: 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

- i. The application is a commercial development for partial demolition of the existing building to provide additional Class E floor space intended for use as offices and retail space and a retail/bar unit in Class E/Sui Generis use. In total, the application proposes 29,853sqm of non-residential floorspace which includes an overall floorspace uplift of 627sqm.
- ii. The proposed land uses are similar to those already on the site and in the local area and would increase the density and quality of the office uses as well as providing ground floor uses that activate surrounding streets, increasing commercial and pedestrian activity, improving safety and security on local streets and ensuring the vitality and viability of the existing commercial frontages. The existing market on Leather Lane would be respected and the site's relationship with it would be enhanced. It is not possible to provide housing on site and a financial contribution would be provided in lieu of this on-site provision.
- iii. The new building would partially demolish, refurbish and extend a recent extension of no noted architectural merit. It would be of a high quality, would respect key local views and would appropriately contrast with the listed building. It would not detract from the conservation area or the setting of the listed building. The works to the listed building would help retain the building in its optimum viable use as a commercial space and thus the low level of less than substantial harm that is created would be outweighed by these public benefits. It is therefore considered that propose development would, on balance, preserve the Grade II* listed Waterhouse Square, and would also preserve its setting and the character and appearance of the Hatton Garden Conservation Area.
- iv. The proposal would have high-quality architecture demonstrated through its well-considered composition and detailing and thus would significantly improve the experience of the urban block from the street and would enhance the public realm around the site. The design creates an open, publicly accessible, commercial ground plane with active ground floor frontages that would improve the safety and security of, and bring life to, local streets.

- v. The scheme has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight, outlook, privacy, and in terms of preventing additional noise disturbance..
- vi. The proposed development would involve the partial demolition, refurbishment and extension of the existing extension on-site. 83% of the volume of the existing extension would be retained and the development would have a substantial carbon saving across the lifetime of the development compared to alternative refurbishment options due to its very low energy demand. The development would also be car free would make the best use of the site in an accessible location. Officers are satisfied with the proposed development in terms of sustainability and energy use.
- vii. The building phase of the proposed development would be required to adhere to a detailed construction management plan to protect the amenity of nearby residents and would also provide financial contributions towards local public realm improvements.
- viii. As such, it is recommended that planning permission and listed building consent is granted subject to conditions and a Section 106 legal agreement.

1 SITE

- 1.1 The site is formed of the northern part of Waterhouse Square at 138-142 Holborn, (also known as Holborn Bars complex) which is located between Beauchamp Street (north), Holborn (south), Leather Lane (east) and Brooke Street (west). Waterhouse Square is split into three separate buildings and the site consists of 2 Waterhouse Square only.

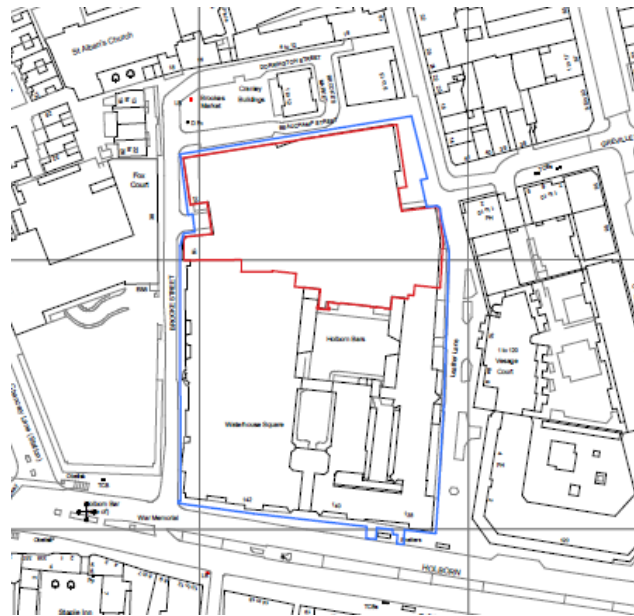


Figure 1: Application site edged in red.

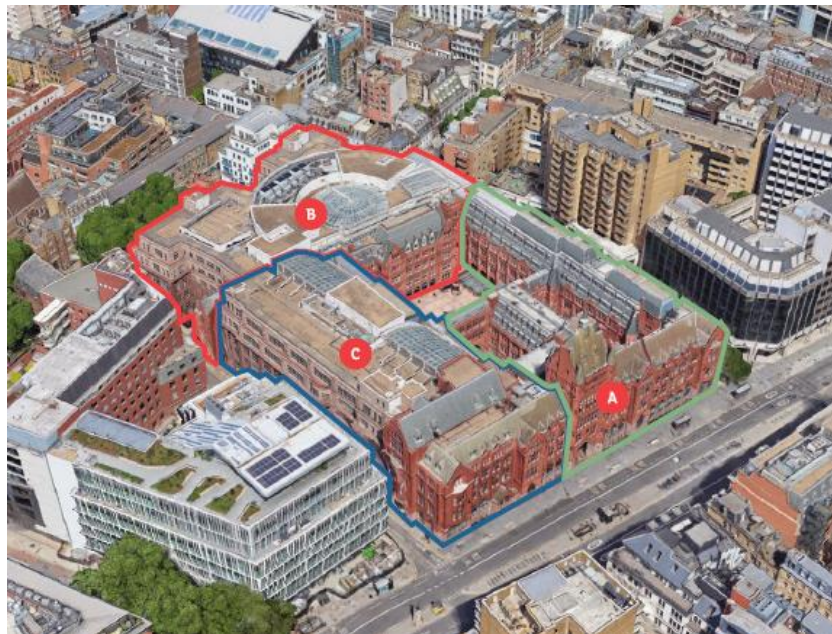


Figure 2: Application site is Block B. Blocks A and C are also part of Waterhouse Square.

- 1.2 Waterhouse Square was built in phases between 1876 and 1901 and was listed Grade II* in 1972. There have been numerous changes to the buildings over the intervening period. 2 Waterhouse Square specifically was subject to substantial demolition, extension and rebuild in 1993. It contains some original fabric but is predominately comprised of a non-original extension. The extension has no significance in the context of the listed building and is considered to 'lack interest' by the Hatton Garden Conservation Area Appraisal and Management Strategy (2017).
- 1.3 2 Waterhouse Square is between five and seven storeys in height (max. AOD 48.2m) with a staggered form that steps back from the building frontage as the floor height increases. The building also includes lower ground and basement levels. The building was most recently in use as offices and is currently vacant.
- 1.4 The surrounding area is a mix of commercial properties at ground floor, with a mix of offices and residential accommodation on the floors above. Local character includes a mix of contemporary and historic architectural styles.
- 1.5 The site lies within the Hatton Garden Conservation Area, the Holborn Growth Area, the Central London Area, three protected vistas to St Paul's Cathedral (from each of Blackheath Point, Greenwich Park Wolfe Statue and Primrose Hill Summit) and an Archaeological Priority Area. It is also designated as being within the Knowledge Quarter as part of the draft Site Allocations document (2019).
- 1.6 There are other notable historic buildings and designations in the vicinity of the site including St Alban's Church (Grade II*) and the St Alban's Clergy House at No. 18 Brooke Street (Grade II). Opposite the site to the north is Brookes Market Open Space.
- 1.7 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). Chancery Lane underground station is located less than 100m from the site to the south-west. There are also several bus routes available nearby.

2 THE PROPOSAL

- 2.1 The application is a for the partial demolition, refurbishment and extension of 2 Waterhouse Square to provide 29,853sqm of commercial floor space (uplift of 627sqm) in the form of 29,531sqm of commercial floorspace (Class E) and a 322sqm of commercial/bar (Class E/Sui Generis) space.



Figure 3. Images of extension adjacent to main Waterhouse Square buildings (two separate images shown above).

- 2.2 The existing seven storey building would be partially demolished and its façade replaced. The existing atrium would be removed, with a new glass roof installed to allow light to penetrate into the re-instated historic courtyard below. The development would provide a modernised seven storey building that is greater in height than the existing by a maximum of 4 metres. The development would have contemporary architecture that responds to the historic fabric of Waterhouse Square and which provides highly sustainable and flexible internal accommodation with an active public realm.



Figure 4. Proposed ground floor plan.

- 2.3 The development would include two new pedestrian access points within the external Waterhouse Square building fabric, one to the northern side of the easternmost new commercial unit and another directly from Leather Lane into the Waterhouse Square courtyard via existing access corridors. The number of cycle spaces would be increased by 421.

3 RELEVANT HISTORY

2 Waterhouse Square

- 3.1 The following applications have been submitted for the application site in recent years:
- 3.2 2023/0985/P. Infill of existing atria to provide additional office space. Certificate of lawfulness granted 16th November 2023.
- Granted as the works do not constitute development.
- 3.3 2023/1167/L. Infill of existing atria to provide additional office space. Under assessment.
- 3.4 2012/3633/L. Internal alterations to include the insertion of partition walls, new flooring and lighting alterations at first and second floor level of existing offices (Class B1a). Listed building consent granted 18th September 2012.
- 3.5 2011/5218/P. Installation of seats and planters to the external courtyards of offices. Permission granted 15th December 2011.
- 3.6 2011/5219/L. Installation of seats and planters in the external courtyards of offices. Listed building consent granted 1st December 2011.
- 3.7 2010/2347/P. External alterations including the replacement of shopfronts by new window openings to the east elevation at ground floor level and installation of new main entrance doors, frameless lobby and associated alterations to southern elevation on inner courtyard of office (Class B1). Planning permission granted 25th June 2010.
- 3.8 2010/2371/L. Internal and external alterations, including the installation of new main entrance doors, frameless lobby and associated alterations to southern

elevation on inner courtyard, and various internal alterations and refurbishments to ground floor lobby and atrium of office. Listed building consent granted 7th July 2010.

- 3.9 2006/5392/P. Change of use from retail use (Class A1) to office use (Class B1). Permission granted 18th January 2007.

Adjacent Site – 1 Waterhouse Square

- 3.10 This adjacent site has been subject to numerous planning and listed building consent applications in recent years. Those submitted since 2015 are listed below:

- 3.11 2023/0560/L. The proposed works are to be undertaken to the external building fabric of the following locations: RHS of Holborn, LHS of Leather Lane, Courtyard A, Courtyard B/C archway and Courtyard C. Works are to include the following: Overflow Chutes - Core drill of c. 50mm diameter holes from the inside of the parapet gutter through to the external side of the wall. - Line the core drilled bore hole with lead and dress into the inside of the parapet. - The chute will protrude from the elevation c.50-60mm. The variance will depend on any obstructions below the protrusion point to ensure no water runs down the facade. Pigeon Wire - Drill small holes at intervals of c. 1.50m and install 25mm masonry rivets for the stainless steel posts to be inserted into and grouted into place. Enough room is to be left at either end of the runs for an anchor point, c. 115mm. - Install the anchor point via a small drill hole and again, a 25mm masonry rivet. - Install the bird wire as per the manufacturers guidance. Listed building consent granted 4th May 2023.
- 3.12 2019/6389/L. Fit out of space to 7th floor and minor additions to first floor of Grade II* listed building. Listed building consent granted 23rd March 2020.
- 3.13 2019/4403/L. Fit out of spaces to part ground and lower ground floors of Grade II* listed 1 Waterhouse Square. Listed building consent granted 18th November 2019.
- 3.14 2019/3508/L. Installation of one satellite dish to central roof area. Listed building consent granted 3rd September 2019.
- 3.15 2019/2605/L. Fit out of spaces to lower ground, ground, fourth and sixth floors. Listed building consent granted 16th July 2019.

- 3.16 2019/2053/P. Installation of 6no condenser units flat roof area at fourth floor level. Listed building consent granted 2nd July 2019.
- 3.17 2019/1938/L. Listed Building Consent for the installation of 6no condenser units flat roof area at fourth floor level. Listed building consent granted 2nd July 2019.
- 3.18 2018/3457/L. Interior fit out of basement, ground, first second, fourth and fifth floors of 1 Waterhouse Square, including the strip out of existing lightweight partitioning and ceiling systems. Construction of new lightweight partitions, new M+E installation and refurbishment of toilets. Listed building consent granted 3rd December 2018.

Adjacent Site – 3 Waterhouse Square

- 3.19 This adjacent site has been subject to numerous planning and listed building consent applications in recent years. Those submitted since 2015 are listed below:
- 3.20 2023/1376/P. Erection of single storey rooftop plant screen. Permission granted 29th June 2023.
- 3.21 2023/1807/L. Erection of single storey rooftop plant screen. Listed building consent granted 29th June 2023.
- 3.22 2016/5996/L. Interior fit of fourth and fifth floor office areas. Listed building consent granted 18th January 2017.
- 3.23 2016/5515/L. Interior fit of ground floor reception area. Listed building consent granted 6th December 2016.
- 3.24 2016/4358/L. Interior fit-out of part ground and first floor of 3 Waterhouse Square, including strip-out and replacement of lightweight partitioning and ceiling systems, new mechanical and electrical installation and refurbishment of WCs. Listed building consent granted 13th September 2016.
- 3.25 2015/6703/L. Interior fit out of the 2nd and 3rd Floor existing office accommodation at 3 Waterhouse Square within the Holborn Bars complex. Listed building consent granted 9th February 2016.

4 CONSULTATION SUMMARY

Statutory Consultees

4.1 Historic England – No objection

Summary

Historic England recognises the benefits of replacing part of the EPR extension to Waterhouse Square with a new building that appears more sympathetic to the listed building's areas of high significance, as well as the Hatton Garden Conservation Area. Although some modest harm would arise from these proposals, we consider there to be a number of heritage benefits that could help to outweigh the harm in accordance with the NPPF.

Additional comments from the National Planning Casework Unit

Officials have considered the information provided above on behalf of the Secretary of State and do not intend to require the application concerned to be referred.

4.2 Greater London Archaeological Advisory Service (GLAAS) – No archaeological requirements.

4.3 Transport for London – No objection.

4.4 Crossrail – No comment.

4.5 London Underground – No objection.

4.6 Thames Water – No objection.

4.7 Metropolitan Police – No objection, subject to recommendations and a condition to achieve secured by design accreditation. [Condition 25].

Adjoining occupiers

- 4.8 Four site notices were displayed around the site from the 23rd August 2023, expiring on the 16th September 2023. A press advert was placed in the Camden New Journal on the 31st August 2023, expiring 24th September 2023.
- 4.9 After the applicant submitted revised plans for the ground floor of the development showing the provision of a flexible commercial/bar unit the proposal was re-advertised. Four site notices were displayed around the site from the 27th October 2023, expiring on the 20th November 2023. A press advert was placed in the Camden New Journal on the 2nd November 2023, expiring 26th November 2023.

Representations summary

- 4.10 Letters of objection were received from 19 separate addresses, which are:

- Nos. 1, 3, 5, 7 & 10 Beauchamp Building
- Nos. 62 & 90 Vesage Court
- No. 702, 7 High Holborn
- 11 Grove Terrace (comment only)
- 97 Calabria Road
- Marriner House, 32-34 Greville Street
- 6 Cranley Buildings
- Nos. 2 & 11 Langdale House, 4-12 Dorrington Street
- No. 2, 20-22, 32 Leather Lane
- No. 14 Vetro Building, 20 Clere Street
- Address not given

- 4.11 One further letter of comment was also received from the Gamages Tenants and Residents Association.

- 4.12 The letters received raised the following issues:

Land Use

- No demand for office accommodation.
- No community facilities provided.
- Bar is inappropriate use for area.

Officer's response: See Land Use section below.

Heritage and Conservation

- All of the existing buildings which contribute to the character and appearance of the conservation area should be retained.

Officer's response: See Heritage section below.

Design

- Low quality architecture and materiality.
- Out of keeping with local character.
- Excessive height.

Officer's response: See Urban Design section below. The height of the new development would be only slightly greater than the existing building (52m AOD compared to 48.2 AOD).

Amenity

- Loss of sunlight and daylight to nearby properties.
- Increased noise from bar/commercial activities and plant equipment.
- Loss of public green space.
- Overshadowing of nearby open space.
- Increased anti-social behaviour.
- New benches would increase public disturbances.
- Increased light spill from the development.
- Increased cost of property maintenance.
- Increased air pollution.
- Noise, dust, dirt, fumes/smoke and other impacts from construction works.
- General health impacts from construction works.

Officer's response: See Amenity and Transport sections below. Construction works are a temporary nuisance that is typically controlled by environmental legislation. It can also be controlled through planning, in this case if permission is granted it is recommended that it is subject to a Construction Management Plan which would be secured by S106 legal agreement. No new benches are proposed in the public realm as part of this application. No green space would be lost as part of this application.

Transport

- Loss of available parking spaces.
- Increased traffic congestion.
- Additional vehicle movements locally.
- Disturbance from construction traffic.

Officer's response: See Transport section below. Construction works would be controlled through a Construction Management Plan and related contributions (implementation support fee and bond) secured by S106 legal agreement.

Sustainability

- Demolition is unjustified due to embodied carbon.
- Development should not be considered sustainable.

Officer's response: See Sustainable Design and Construction section below.

Consultation and Process

- Lack of public consultation.
- Poorly communicated public consultation.

Officer's response: The applicant has undertaken pre-application consultations with relevant parties as required by the Council's Statement of Community Involvement. The Council has consulted on the planning application in accordance with the legislation and its Statement of Community Involvement.

Others

- Loss of property value.

Officer's response: Loss of property value is not a material planning consideration that can be taken into account during the assessment of a planning application.

4.13 3 letters of support were received from the Central District Alliance and Hatton Garden Business Improvement Districts, and from 36 Laney House, raising the following points:

- Development is sympathetic to local heritage.
- Enhanced public realm.
- New workspace and community spaces.
- Highly accessible location for development.
- Improvements to local economy.
- High internal sustainability.

5 POLICY

National and regional policy and guidance

National Planning Policy Framework 2023 (NPPF)

National Planning Practice Guidance (NPPG)

Written Ministerial Statement on First Homes (May 2021)

London Plan 2021 (LP)

London Plan Guidance

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy G1 Delivery and location of growth

Policy H1 Maximising housing supply

Policy H2 Maximising the supply of self-contained housing from mixed-use schemes

Policy C1 Health and wellbeing

Policy C2 Community facilities

Policy C4 Public houses

Policy C5 Safety and security

Policy C6 Access for all

Policy E1 Economic development

Policy E2 Employment premises and sites

Policy A1 Managing the impact of development

Policy A2 Open space

Policy A3 Biodiversity

Policy A4 Noise and vibration

Policy D1 Design

Policy D2 Heritage

Policy D3 Shopfronts

Policy CC1 Climate change mitigation

Policy CC2 Adapting to climate change

Policy CC3 Water and flooding

Policy CC4 Air quality

Policy CC5 Waste

Policy TC1 Quantity and location of retail development

Policy TC2 Camden's centres and other shopping areas

Policy TC4 Town centre uses

Policy TC6 Markets

Policy T1 Prioritising walking, cycling and public transport

Policy T2 Parking and car-free development

Policy T3 Transport infrastructure

Policy T4 Sustainable movement of goods and materials

Policy DM1 Delivery and monitoring

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

Access for All CPG - March 2019

Air Quality - January 2021

Amenity - January 2021

Biodiversity CPG - March 2018

Community uses, leisure and pubs - January 2021

Design - January 2021

Developer Contribution CPG - March 2019

Employment sites and business premises - January 2021

Energy efficiency and adaptation - January 2021

Planning for health and wellbeing - January 2021

Public open space - January 2021

Town centres and retail - January 2021

Transport - January 2021

Water and flooding CPG - March 2019

Other guidance:

Hatton Garden Conservation Area appraisal and management strategy (2017)

6 ASSESSMENT

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

7	Principle of Development
8	Land use
9	Conservation and Heritage
10	Urban design
11	Amenity of neighbouring properties
12	Sustainable design and construction
13	Air quality

14	Flood risk and drainage
15	Nature conservation, landscape and biodiversity
16	Transport
17	Safety and security
18	Employment and training opportunities
19	Planning obligations
20	Mayor of London's Crossrail CIL
21	Camden CIL
22	Conclusion – planning and listed building consent applications
23	Recommendations
24	Legal comments
25	Conditions (planning application)
26	Informatives
27	Conditions (listed building consent)

7 PRINCIPLE OF DEVELOPMENT

- 7.1 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved.
- 7.2 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site. The Council anticipates Central London playing a key role in facilitating that growth. The supporting text to Policy G1 states that the Council shall promote and encourage high-quality developments with high densities to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of the borough, whilst also seeking to improve the quality of the environment, protect the amenity of occupiers and neighbours and meet other relevant planning objectives.
- 7.3 The site is located within a Central London area with the highest possible transport accessibility (PTAL of 6b). The proposed development would utilise the site more effectively through increasing the density of the activities on it. The development would reuse a large proportion of the existing building structure and would provide a building that is of a high-quality internal layout and overall design. An assessment of the proposed building's impact on the local built environment is provided in the heritage and design sections (Sections 9 and 10) below. The development's impact on the occupiers of nearby residential properties is discussed in the amenity section (Section 11) below.
- 7.4 As such, the principle of partially demolishing, refurbishing and extending the existing building to create a higher density commercial development is considered acceptable in respect of the objectives of the NPPF and the Camden Local Plan subject to the consideration of all other relevant matters as described below.

8 LAND USE

Introduction

- 8.1 The proposed development is for the partial demolition, refurbishment and extension of the existing buildings on the site, including replacement of the existing façade, to form a new seven storey building providing replacement commercial space (Class E) and retail/bar space (Class E/Sui Generis).
- 8.2 The existing and proposed land uses on the site are as follows:

Use	Existing sqm (GIA)	Proposed sqm (GIA)	Change sqm (GIA)
Class E	29,226	29,531	+305
Class E / sui generis (bar)	0	322	+322
<i>Total</i>	<i>29,226</i>	<i>29,853</i>	<i>+627</i>

Figure 5. Existing and proposed land uses on the site (GIA)

Increased Commercial Space

- 8.3 Local Plan policy E1 seeks to secure a successful and inclusive economy and encourages economic growth. Policy E2 encourages the provision of employment premises and sites. Policy G1 seeks a mix of uses in accessible parts of the borough (including self-contained housing where appropriate), including the provision of 695,000 of office floor space and 30,000sqm of new retail space by 2031. Policy G1 states that the most significant growth will be expected in the borough's growth areas which includes Holborn.
- 8.4 Policy TC1 of the Local Plan seeks additional provision of retail and other town centre uses such as food, drink and entertainment activities in growth areas such as Holborn. Policy TC4 states that new town centre uses should not cause harm to the character, function, vitality and viability of the local area, and that potential harm shall be managed through conditions and planning obligations. Policy C4 of the Local Plan states that the Council will support the provision of new public houses in appropriate sites in growth areas, highly accessible areas and town centres.
- 8.5 There would be an increase of 627sqm in commercial floorspace at this site in the form of Class E (office, retail) and Class E/sui generis (retail/bar) floor space. The new Class E and Class E/bar spaces would be provided at ground floor level in corner locations that would activate the surrounding streets. The office activities would be located on the floors above.
- 8.6 The existing site contains office uses and as such re-providing reconfigured and higher density office floorspace in this highly accessible growth location is acceptable. The improved quality of the offices would help to attract and retain businesses in the area and would act as a catalyst to re-activate this currently vacant existing office site. Local plan policies also support the provision of town centre uses such as retail, food and drink premises, including new drinking establishments, in highly accessible growth areas such as Holborn.

The local area is already highly commercial at ground floor level and this proposal would reflect that character and function. The proposed development, through the high-quality of the new ground floor commercial uses and the increased density of its office uses on the upper floors, would be expected to bring increased pedestrian activity into the area thereby increasing spending, improving the vitality of the local area and the viability of existing commercial activities in the surrounding streets.

- 8.7 The scheme results in a net increase of employment floorspace of 627sqm and therefore doesn't trigger the requirement set out in the CPG for affordable workspace (trigger is 1,000sqm).

Non-provision of self-contained housing

- 8.8 Policy H2 of the Local Plan states that where new development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses. The policy continues, that in the Central London Area (CLA) development providing more than 200sqm of additional floorspace will require 50% of all additional floorspace to be self-contained housing, unless there are practical reasons relating to development character, function and ability to meet policy requirements as to why this cannot be achieved. If the site and development are considered unsuitable for new housing a financial contribution in lieu of housing shall be secured instead. The supporting text to Policy H2 describes that developments with greater than 1,000sqm of new floorspace will generally be able to provide new housing on-site. As such, it is considered more difficult for developments with new floor areas below this threshold to achieve on-site housing.
- 8.9 The local area includes multiple properties with residential on upper floors and as such local character is not a valid reason for failing to provide residential accommodation at this site. However, the development represents a relatively small increase in commercial space. Furthermore, the design of this development proposal has placed a strong emphasis on replacing large areas of inactive frontage that currently exist onto Leather Lane, Beachamp Street and Brookes Street (as the result of the large proportion of service and administrative functions at ground level) with active uses and a new prominent main entrance. Providing residential uses on the floors above would increase the amount of service, storage, core and other ancillary residential space needed at ground floor, leading to reduced urban design and community safety improvements from the development. It would also reduce the functionality and comprehensiveness of the office re-configuration on the upper floors, which would reduce the applicant's incentive to bring this scheme forward for development given that the overall floorspace uplift is relatively small for a central London location.
- 8.10 The requirement for an additional residential core at the site would also lead to further demolition of the building, which the developer has attempted to minimise in accordance with the Council's sustainability policies.

8.11 As such, it is considered that the provision of on-site housing is not suitable as part of the proposed mix of uses in the specific circumstances relating to this development proposal, as described above. The nature of the dense urban environment of the local area also means that there are no other appropriate developable sites immediately available nearby where housing could be provided instead. Therefore, Policy H2 allows that, in an exceptional situation such as this, a payment in lieu of providing new housing on-site may be secured instead. This has been calculated at £470,250 and shall be secured through S106 legal agreement.

Impact on Adjacent Street Market

8.12 The site is located adjacent to the Leather Lane market which operates Monday to Friday. Policy TC2 of the Local Plan states that the Council will support Camden's markets and policy TC4 states that the impact on markets shall be considered as part of new town centre development. Policy TC6 states that markets in Camden will be protected and promoted.

8.13 The proposed development has taken into account the existing neighbouring street market on Leather Lane. The market caters specifically to providing street food and the proposed Class E and Class E/bar units have been designed to complement and not replicate the character and activities of the market. The new units are expected to enhance the existing retail offer through providing high quality new retail units adjacent to the Leather Lane local centre. The ground floor retail units would have a fairly typical contemporary commercial design that allows for a flexible range of activities, such as a shop unit, café, small restaurant or ancillary office space to be accommodated, but which would not suit a dedicated market-style layout. The very nature of street food markets means they are best suited to either large floor plan or fully open-air spaces, which is not the type of commercial space being provided as part of this development. The proposal is instead expected to increase the density and quality of office and other commercial floor space, which should act to attract more pedestrians and other potential customers into the local area. The Council's Markets Officer has been consulted on this application and has raised no objections to the proposed uses.

8.14 The applicant has confirmed they are committed to working with the market traders including potentially providing access to development facilities where this is appropriate. Further details of the relationship between the market and the development shall be the subject of separate discussions between the applicant and market traders at a later date.

8.15 As such, it is expected that the proposed development would enhance and not be of detriment to the existing street market on Leather Lane.

Summary

8.16 The proposed reconfiguration and extension of the existing office use is strongly welcomed and will bring economic, employment and training benefits to the area.

The provision of flexible Class E floor space at ground floor, which includes potential for a small bar, is also supported as it would maximise the vitality of this town centre local, contribute towards overall local commercial viability, and bring urban design benefits such as improved activity and surveillance onto local streets. The existing street market on Leather Lane would be respected and enhanced as part of this development.

8.17 It is acknowledged that the development would provide no new housing and thus falls short of the 50% target in Policy H2, however it is acknowledged in this case that providing housing on-site would significantly erode other benefits of the scheme including the proposed improvements to ground floor activity and safety, the vitality and viability of the town centre, the quality of the reconfigured office space, a reduction of the sustainability of the development by virtue of requiring additional demolition. Furthermore, there are no suitable sites available nearby for new off-site housing, and thus the provision of a payment in lieu is exceptionally considered acceptable in this case.

8.18 As such, it is considered that the development proposal is acceptable in land use terms and for all other reasons, subject to further consideration of the relevant matters in the sections below.

9 CONSERVATION AND HERITAGE

Policy Summary

9.1 Policies D1, D2 and CPG Design of the Camden Local Plan are relevant to conservation and design. The supporting text of policy G1 seeks development of the highest quality.

9.2 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") are relevant with regards to impacts on heritage assets. 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 and S.66 imposes a similar requirement in relation to listed buildings and their settings when considering applications relating to land or buildings within that area. The effect of these sections is that there are statutory presumptions in favour of the preservation of the character and appearance of Conservation Areas, the impact of works to the listed building and the impact of those works on the setting of listed buildings.

9.3 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 12). Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. Para 195 states that local authorities, when considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal. Para 197

states that in determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

- 9.4 Para 199 states that when considering the impact of a proposed development on a heritage asset (including through its setting), local planning authorities should give 'great weight' to preserving the asset's significance (and that the more important the asset the greater the weight should be). The decision-maker must give "considerable importance and weight" to any finding of harm, and any harm or loss requires clear and convincing justification (paragraph 200).
- 9.5 The NPPF also states in para 202 that where less than substantial harm is identified, it should be weighed against any public benefits and that considerable importance and weight must be attributed to the harm in such balancing exercise. Para 203 states that a balanced judgement on the effect of proposals on non-designated heritage assets is required, having regard to the scale of harm that would be caused to them.



Figure 6. Waterhouse Square building frontage (from Holborn).



Figure 7. Waterhouse Square building entrance, close up (from Holborn).



Figure 8. 1990s rear extension to 2 Waterhouse Square (from Brooke's Market).



Figure 9. 1990s rear extension to 2 Waterhouse Square (from east on Greville Street).

Site and surrounding context, and their significance

- 9.6 Waterhouse Square, also known as Holborn Bars or the Prudential Assurance Building, was built between 1885 and 1901 as a large office complex for the Prudential Assurance Society and remains in office use. It was designed by Alfred Waterhouse - a celebrated 19th Century English architect and a leading proponent of the High Victorian Gothic style.
- 9.7 Externally, the complex is dominated by its dramatic front range, known as the Furnival's Inn block, constructed in striking red brick and terracotta on a granite base, and composed of a central tower terminated by corner turrets and hipped roof with fleche. The tower is flanked by tall decorative wings. It is an imposing and striking historic landmark in views along High Holborn.
- 9.8 The tower features a large carriageway arch at its base which leads to a series of decorative and enclosed courtyard areas, two of which are publicly accessible with additional arched entrances on Leather Lane and Brooke Street. The courtyard plan evokes the layout of Furnival's Inn which previously occupied the site, and is a defining component of the listed building's plan form and architectural character.

- 9.9 Significant interiors survive particularly within the Furnival's Inn block, and whilst much of the complex has undergone numerous office refurbishments over the years, high quality circulation spaces are evident throughout.
- 9.10 The building complex was altered and extended in 1930-32 EM Joseph which introduced larger floorplates and Art Deco decoration to the building complex. Much of that phase of development was replaced in 1989-93 by EPR Architects who introduced a large extension to the rear and extensively redeveloped the Brooke Street range behind the inner courtyard facades.
- 9.11 The EPR work maintains the general building height of the Waterhouse Square complex, and its Post-Modernist elevations are built in polished pink granite which complements the materiality of the original building. The EPR work has an architecturally unresolved junction with the brickwork façade along Leather Lane by Greville Street. Its relationship with the retained 1878-9 fragments along the Brook Street façade is similarly unsuccessful. The existing offices do retain some striking Victorian architectural features including decorative columns, ceilings and panelling, as well as glazed brickwork and tiles in the circulation spaces.
- 9.12 Waterhouse Square remains a building complex of considerable architectural and historic interest as recognised in its high level of listing at Grade II*. Its significance is within the parts of the site erected to the designs of Alfred Waterhouse, evidential value, its architectural design and materials, and its townscape contribution including its positive contribution to the character and appearance of the Hatton Garden conservation area. Waterhouse Square is considered a key landmark within Sub Area 4 of the Conservation Area.
- 9.13 The Hatton Garden Conservation Area Appraisal and Management Strategy (HGCAAMS, 2017) stresses that the EPR additions "lack interest". The negative qualities of the extension are also highlighted in relation to Brooke's Market. The Appraisal states that "Brooke's Market has a strong character which comes from a series of brick buildings whose frontages directly address the central open space and its mature trees, but the south side of Brooke's Market and Brooke Street suffer from the inactive frontages of the Waterhouse Square development".

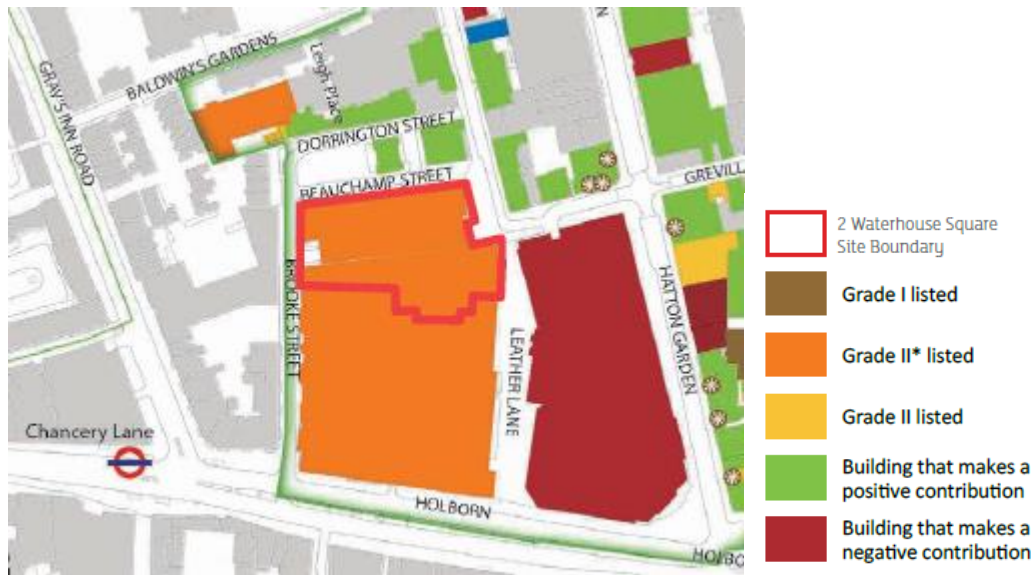


Figure 10. Historic buildings in this part of Holborn (from HGCAAMS)

9.14 The Hatton Garden Conservation Area Appraisal and Management Strategy identifies the C19th/early C20th parts of Waterhouse Square as making a positive contribution to the character and appearance of the conservation area whereas the late C20th parts are noted as not contributing positively to the character and appearance of the conservation area. The buildings adjacent to the part of the site proposed for redevelopment (Beauchamp Street, Dorington Street, and Leather Lane north of Greville Street) are predominately positive contributors. As well as containing the Grade II* listed Waterhouse buildings the site forms the setting of several listed buildings. Those most immediately affected by the proposals are: 18 Brooke Street (Grade II), Church of St Alban the Martyr Grade II*, 10-11 Greville Street (Grade II).

Proposal and Assessment

9.15 Impact on Significance of Listed Building Fabric

9.16 The works affecting the listed building are predominantly internal and includes works such as revealing internal window heads through the removal of the internal dropped ceilings, reinstatement of an entrance way in the internal porch area, greater revealing of existing walls within the new atrium area and general retention and restoration of original Waterhouse fabric throughout the site. Although there would be some demolition to parts of the later 1990s extension the fabric of that part of the site is not listed and therefore results in no loss of heritage significance.

9.17 In terms of the listed fabric there are also external changes proposed, which are the creation of two new openings on the northern and eastern elevations of the historic part of the development. One opening would provide access into the easternmost

new Class E unit from Leather Lane/Greville Street. The other opening would provide access directly from Leather Lane into an existing corridor and onto the Waterhouse Square internal courtyard. This second entrance would also require removal of railings and a wall adjacent to Leather Lane.

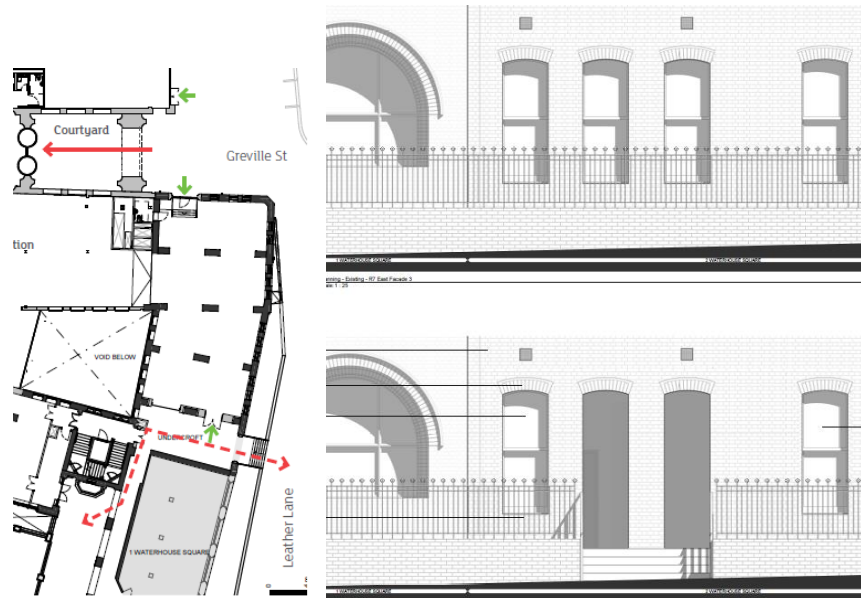


Figure 11 and 12. Proposed new northern (to top of Class E unit) and eastern (to right of undercroft) entrances [left image]; and existing (top) and proposed (bottom) view of location of new eastern entrance [right image].



Figure 13. Existing (left) and proposed (right) view of new northern entrance.

9.18 These works would demolition and alter the Grade II* building's 19th Century fabric and would create harm to its significance due to the loss of this historic fabric and plan form. It is also considered that there would be a loss of evidential value to the site as the original building was not intended to be accessed in the manner proposed. However, it is considered that the entrances are sensitively designed from

a heritage perspective with an architectural language used that is appropriate for each opening within the context of its host elevation and proposed activity. As such, although there is harm it is considered that this is less than substantial harm and at the lower end of the less-than-substantial scale.

9.19 Para 202 of the NPPF dictates that where less than substantial harm is identified, it should be weighed against any public benefits. The use of the building was originally as commercial space and the proposed accesses would help to facilitate the ongoing commercial use of this site, as well as increasing activity on the ground floor through improving public access to underused parts of the existing site. As such it is considered that securing the optimum viable use of the site, increased commercial activity and increased public safety and security would be sufficient public benefits to outweigh the low level of less than substantial harm in this case. This position is supported by both the Council's Conservation Officer and Historic England.

9.20 Impact on Significance of the Conservation Area and the Setting of the Listed Building

9.21 The Hatton Garden Conservation Area Appraisal and Management Strategy (HGCAAMS) states that the recent extension to Waterhouse Square "lacks interest and is at odds with the character of the area". This recent extension would be replaced with a structure that is slightly higher, and of slightly greater scale and massing overall, but which would have a more articulated form and would feature an improved and more active street frontage, compared to the existing building. The articulation of the new facades would be well-considered in terms of the use of relatively restrained materials, punctuated by high-quality detailing, and the rhythm of bay widths which reflects that on the historic Waterhouse Square buildings. The proposed development would therefore engage better with the surrounding public realm compared to the existing extension which is noted in the HGCAAMS to be of relatively low design quality.



Figure 14. Image of new development from Brooke's Market (north).

- 9.22 The limited increase in the massing and scale to the north block means that the proposed development would not obstruct any key views of the historic buildings in the local area. Furthermore, the relatively restrained external materiality, as well as the overall design improvements referenced above, would ensure those historic buildings have prominence in the surrounding public realm. This would preserve the character and appearance of the conservation area and would not detract from the setting of the Grade II* listed building when compared to its current appearance and setting which includes the existing extension.
- 9.23 When viewed from within the main internal Waterhouse Square courtyard to the south of the site, the existing rear extension is partially visible, which encroaches on the silhouette of the existing historic building. The proposed building would appear reduced in height, compared to the appearance of the existing extension, when viewed from this internal courtyard area. This would reduce the level of existing harm to the listed building as a result.



Figure 15. Images of the existing extension (left image) and the proposed development (right image), see top left corner of both images, from the Waterhouse Square courtyard.

9.24 Given that a low quality existing extension would be replaced, and given that the proposed development would have a restrained yet improved design that respects key local heritage views and local context, including improving heritage views from within the Waterhouse Square courtyard, it therefore is considered that the proposed development would meet the statutory obligation to have due regard to the character and appearance and setting of statutorily designated heritage assets (the conservation area and listed building) and would result in a neutral to mildly beneficial impact on the setting of the listed building and preserve the character and appearance of the conservation area.

9.25 London View Management Framework

9.26 Policy HC4 of the London Plan states that developments should not harm the characteristics and composition of Strategic Views.

9.27 The building would sit underneath the location of the closest protected view of the London View Management Framework (5A.2 Greenwich Park to Central London, which is at 52.3m AOD) and as such the development would not harm any strategic view.

Conclusion – Impact on significance

9.28 The proposals comprise **less than substantial harm**, at the lower end of the scale as regards the introduction of new openings into the historic fabric of the Grade II* listed building on Greville Street and Leather Lane.

9.29 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the harm caused to it. As there is less than substantial harm caused to the significance of designated heritage assets, this harm should be weighed against the public benefits of the proposals in reaching a decision in accordance with para 202 of the NPPF.

9.30 The use of the building was originally as commercial space and the proposed new accesses would help to facilitate the ongoing commercial use of this site, as well as increasing activity on the ground floor through improving public access to underused parts of the existing site. As such, it is considered that securing the optimum viable

use of the site, increased commercial activity and increased public safety and security would outweigh the low level of less than substantial harm in this case.

9.31 As such, on balance, the proposed development is acceptable in heritage terms.

Archaeology

9.32 The site is located within an Archaeological Priority Area (Tier II). The Greater London Archaeological Advisory Service were consulted and have no objection to this development proposal.

10 URBAN DESIGN

10.1 Camden Local Plan policy D1 and D2, and CPG Design, are relevant to the consideration of design when assessing planning applications, and reference the protection of strategic views. Policy D3 requires well-designed shop fronts. The CLP identifies the Holborn Growth Area as a part of Camden where significant growth is expected to be concentrated.

Site appraisal and opportunity

10.2 The existing extension on the site extended the original Waterhouse Square development north over Greville Street. The square to the east of the building was created as a result and is an important pause in the townscape with Leather Lane opening up at the junction of Greville Street. The existing extension is faced with pink granite which is sympathetic in tone to the red brick finish of the historic Waterhouse Square buildings, though it is also noted that the conservation area guidance document considers it a low quality feature in the local neighbourhood. At ground floor there is very little activity or engagement with the streets around the building other than at the vehicular service entrance on Brooke Street.

10.3 There is potential to improve the contribution this site makes to the local streetscape through:

- Increasing the number of entrances at ground floor to improve safety of the streets in and around the site;
- Introducing high quality public realm improvements including new routes, street planting and greenery to improve safety and permeability;
- Improving access to the publicly accessible courtyard within the Waterhouse Square complex;
- Improving the safety of Brooke's Market;
- Enhancing the relationship with the heritage assets and refurbishing and restoring the listed buildings;
- Improving the sustainability credentials of 2 Waterhouse Square and the wider estate; and

- Creating a richer mix of uses across the ground floor and contributing to the improvement of the public realm.

Assessment of proposals

Key features of the proposed development

10.4 The development would appear as a comprehensive redesign of the existing extension, albeit in practice 83% of the volume of the existing building including a large part of the steel frame and the foundations, would be retained. The development proposes to extend the life of the existing building as far as possible, and to achieve this an element of demolition is required in order to achieve the necessary improvements in internal quality. Parts of the existing extension's internal structure would be demolished to be replaced with a wider, lighter internal atrium and a new courtyard, accessed through an archway feature that acts as a continuation of Greville Street. These works would also enable improved access to and through the building and its floors.

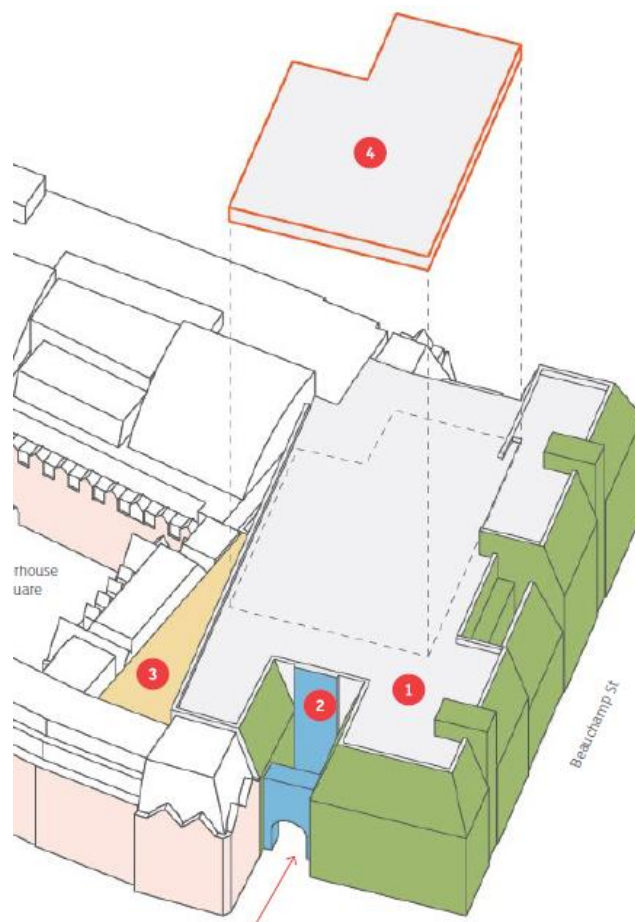


Figure 16. Key features of the design include the new façades (1), an arched entrance to a new courtyard (2), a large glazed internal atrium (3) and a set-back additional storey.

- 10.5 The external granite cladding will be predominantly replaced, with some being retained as part of a ground floor plinth. Other parts of the cladding would be reused in the existing building, including as part of pre-cast concrete panels and internal design features.



Figure 17. The internal layout and building quality improvements, including new cores, raised floor levels and active ground floor frontages, necessitate the removal of most of the existing granite cladding (areas removed in red).

- 10.6 Upper floors of the building would be re-articulated and infilled as appropriate to maximise the quantum and quality of the internal floorspace. An additional storey would be added onto the roof. The roof levels would be staggered on the northern side of the site to enable terraces to be integrated and to ensure the scale and massing of the structure on that side is limited.



Figure 18. Before and after images of the existing rear extension and the proposed development, demonstrating the similar siting, scale and massing.

Design Review Panel

- 10.7 On 9th June 2023, the emerging proposals were presented to the Design Review Panel (DRP). The panel welcomed the distinction between the extension and the historic Waterhouse Square building. There was support for the massing, the

treatment of the original Waterhouse fabric, the reinstatement of the internal courtyard and the overall architectural principles.

10.8 The panel took the view that a colonnade onto Leather Lane (a feature included in previous pre-application versions of the scheme) was unnecessary and that the Greville Street entrance appeared unresolved and too dominant. The sustainability approach was welcomed but further justification required in relation to the façade replacement. Following the DRP review, these recommendations were taken on board and are reflected within the development as it is currently proposed. The colonnade was removed, and the Greville Street entrance was amended to have a more subtle relationship with the listed building. Further justification for the internal demolition and façade replacement have been provided and are described above and in Figure 17.

10.9 It is considered that the changes made following the DRP review sufficiently addressed the comments made by the panel, resulting in an improved proposal, and therefore no further review is required.

Design response

10.10 The proposed site wide strategy would create an improved ground floor experience in and around Waterhouse Square. Through positive engagement with its surroundings and the introduction of active frontages, the proposals would deliver sensitive and high-quality new architecture, with improved connections provided to and through this unique complex of historic buildings and an improved active contribution to the surrounding public realm also provided.

10.11 Through the reworking of the existing extension, with existing materials being reused and recycled, the proposed development reimagines the existing building to create a resilient new building that respects its sensitive historic context and which substantially bolsters its environmental performance in the process.

Ground floor layout, uses and public realm

10.12 The proposed development would feature offices on upper floors and a mix of commercial uses at ground level to ensure the ground floor would be significantly more engaging and characterful.

10.13 The new office entrance on Greville Street would connect through to the existing entrance to the site from the south on Waterhouse Square. A new cycle entrance would be provided within the Brooke's Market elevation, thus further increasing the degree of activation to the currently blank frontage in this area. A new public route through the site would be introduced from Leather Lane to Waterhouse Square and a new commercial unit fronting onto Greville Street would sit within the historic building fabric. The new arrangement would provide more active frontage to the perimeter of the site whilst also providing a greater degree of connectivity

through the site which accords with the requirements of policy D1. The significantly higher degree of active frontage would also contribute positively to the vibrancy and economic vitality of Leather Lane.

- 10.14 The main servicing provision is on Brooke Street which is the same as the current arrangement. Its location on Brooke Street ensures vehicular servicing movements are kept away from the most well used areas of public realm at Greville Street, Leather Lane and Brookes Market.



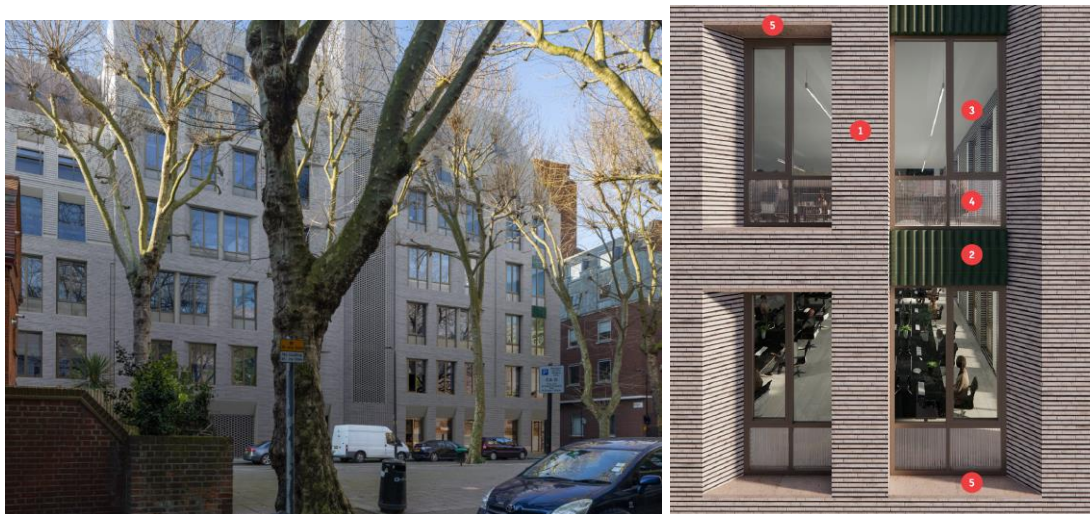
Figure 19. Image of the proposed Leather Lane elevation shows how ground floor passive surveillance of local streets would be improved.

10.15

- 10.16 It is understood that the applicant has an aspiration to work with the Central District Alliance Business Improvement District, which covers this part of Holborn, to help create a vision for surrounding public realm areas including Brookes Market, which is welcomed. Public realm improvements in the form of financial contributions towards the local pedestrian and cycling environment, and towards improvements on Brooke's Market, will be secured through s106 legal agreement.

Scale and massing

- 10.17 The proposed development would partially demolish, refurbish and extend the existing extension to form a seven storey building on the site. The massing of the development would successfully balance its relationship with both the Waterhouse Square courtyard and the public realm of Brooke's Market to the north. It would also have a relatively limited impact on the amenity of existing properties in the local area, and this is discussed in further detail in the relevant section below (Section 11).
- 10.18 The proposed building would have a maximum datum of 52.0m. This would be only 3.8 metres greater than the maximum height of the existing extension (48.2m) and it is considered that this relatively minor increase does not present any townscape concerns as a result.
- 10.19 A series of measures have been employed as part of the proposal to break down the bulk of the building and ensure it responds well to its context. The Hatton Garden Conservation Area is characterised by narrower plot widths with a more vertical emphasis. In response, the proposal would create a more modulated and sculptural form that reads as a series of distinct volumes. Along the northern elevation to Brooke's Market, the building is subdivided into bays, with the existing staircases punctuating the façade, accentuating the verticality of the proposed building and further breaking down its mass. This creates a more contextual and softer southern edge to Brooke's Market and Beauchamp Street.



Figures 20 & 21. Image (right) shows revised articulation onto Brooke's Market and (left) shows detailed example of window reveals

- 10.20 A varied roofscape is proposed. Gables reveal where the blocks shift in height which responds to the character of the area. Additionally, the roof pitches back to create a softer edge when viewed from street level and to maintain light to Brooke's Market. There are a series of existing windows in the Cranley Building on its southern facade. To address these, the proposed massing will step down, in a

similar manner to the current building to allow more daylight to reach these properties.

- 10.21 The roof pavilion would be most prominently read from within Waterhouse Square itself but is also visible from longer views along Greville Street. The proposed architectural response results in an undulating roofscape with depth, layering and the expression of arches which creates interest when seen in glimpsed views. It appears as a more refined composition than the existing roofscape when viewed from Waterhouse Square.



Figure 22. Image (right) shows new arched entrance which forms a continuation of Greville Street

Architectural approach

- 10.22 The proposals present a contemporary response to the architectural expression found in the Hatton Garden Conservation Area. The design references features that are visible within the surrounding townscape including the introduction of a sense of narrower plot widths, and the expression of gables; the proposal has a more sculpted form and a more characterful and engaging ground floor. Architecturally the extension has been designed to relate well to the existing listed building, albeit with a different aesthetic, to form a well-considered piece of townscape.
- 10.23 The design of the proposed facades applies the above principles to create interesting and varied elevations. The façade is treated in a single material to the

walls and roof to maintain a sculptural quality; within this the fenestration shifts to create larger and smaller openings, bringing articulation and richness to the façade. Larger openings will be subdivided to allow for openable windows which is welcomed. At the building's corners balconies would soften the edges of the building.



Figure 23. Close up image of junction of Leather Lane and Brooke's Market

10.24 At ground floor there is a greater level of visual transparency with larger window openings to improve the level of engagement. The consistent scale and detailing of the design would unify the ground plane and the public realm experience around the perimeter of the building.

10.25 A new entrance is proposed on the Greville Street axis, set-back within an external courtyard to better define the main access point and provide some respite and calm from the busy market, which operates daily. The proposed entrance expression takes inspiration from the surrounding Waterhouse Square architecture. Waterhouse used enlarged arches to define entrances and routes into the site. With this new entrance, an arched link bridge between blocks leads into a landscaped courtyard. Beyond that main arch is another archway that marks the entrance to the historic building. The windows above the entrance and bridge are of a tighter scale to reinforce the definition of a new route into the site.

Materiality

10.26 The pink granite material on the existing Waterhouse Square extension is not commonly found elsewhere in the conservation area. The proposed new facades would include a buff brick as the primary facing material with masonry shingles at roof level. The use of brick as a finishing material is more consistent with the

surrounding brick buildings of Brooke's Market and the wider conservation area, whilst also being complimentary to the historic terracotta facades of the Waterhouse Estate. The proposals state that the pink granite would be re-used where possible, which is welcomed. The first re-use option is for it to be incorporated into the ground floor building plinth. The viability of this option is still being explored. Precast panels are another design option and the granite may also be re-used in a range of building features including terrazzo flooring, planters and landscaping, waste-based bricks or in building aggregate. Further details of material re-use shall be secured through condition (Condition 11).

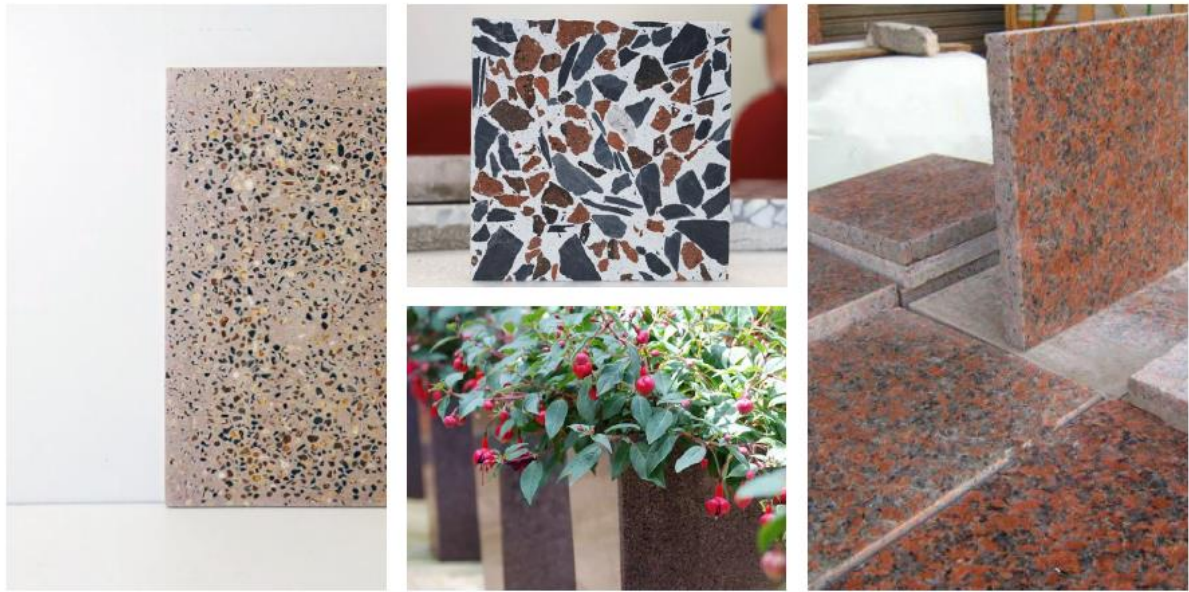


Figure 24. Potential uses for the granite façade includes being part of the ground floor plinth finish, part of stone-faced building cladding, part of the flooring or part of a planter.

- 10.27 The material palette and details as described within the submission documents are of a high quality and are considered to respond appropriately to the character of the area in line with policies D1 and D2 of the Local Plan. Given that the brick and masonry shingle will be the primary facing material, careful consideration has been given to its tone and quality to ensure the successful relationship with the surrounding buildings. Materials and detailing are therefore conditioned [Conditions 3 and 4] to ensure a building of the highest quality with durable finishes that would weather gracefully.

Conclusion

- 10.28 The proposal would significantly improve the experience of the urban block from the street and would enhance the public realm around the site. The design creates an open, publicly accessible, commercial ground plane with active ground floor

frontages, and a new route connecting into the courtyard of Waterhouse Square from Leather Lane.

- 10.29 This increased granularity of uses reflects the positive qualities of Leather Lane, and a continuity of street life and character, and begins to bridge the severance to the urban grain that has been created over time by large footprint, overly defensive monumental buildings with fewer entrances, single use blocks and long blank frontages.
- 10.30 The proposed building would knit the development into its context creating a cohesive and coherent townscape that makes a positive contribution to the surrounding streets.
- 10.31 The high-quality architecture demonstrated through its composition and detailing has been well considered and this proposal demonstrates a high-quality example of how development can enhance the setting of designated heritage assets.
- 10.32 As such, the design of the development is considered acceptable and is in accordance with the requirements of policies D1 and D2 of the Local Plan.

11 AMENITY OF NEIGHBOURING PROPERTIES

- 11.1 Camden Local Plan policies A1 and A4 and the Amenity CPG are relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impacts from construction works are also relevant and these are dealt with in the 'Transport' section below. The thrust of the policies is that the quality of life of residents should be protected and development which causes an unacceptable level of harm to amenity should be refused.
- 11.2 The closest residential properties are located on Beauchamp Street, Brooke's Market and Dorrington Street to the north of the site, on Greville Street and Leather Lane to the east and on Brooke's Street to the west.

Daylight, sunlight and overshadowing

- 11.3 A Daylight, Sunlight and Overshadowing Report (DSOR) was submitted as part of the application.
- 11.4 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes. However, the guidance should not be applied rigidly and should instead be used to quantify and understand potential impacts when making a balanced planning judgement.

- 11.5 Paragraph 125 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making the efficient use of a site, as long as the resulting scheme would provide acceptable living standards overall.
- 11.6 The BRE assessment methodology has been used for assessing the effects on existing surrounding properties, including daylight (the two-part assessment of VSC and NSL) and sunlight (the two-part assessment of APSH annually and in winter) to buildings and sun-on-ground to amenity spaces.
- 11.7 Detailed tabulated results have been provided showing the daylight and sunlight levels in the existing and proposed conditions, the absolute loss (existing value minus proposed) and relative loss (absolute loss divided by existing value, expressed as a percentage).
- 11.8 To assist understanding of the magnitude of the impacts the terms 'negligible', 'low', medium' and 'high' for the magnitude of impact are used, based on the categorisation set out in the table below.

Impact satisfies the BRE guidelines	Impact does not satisfy the BRE guidelines		
	20.1% to 29.9% loss	30% to 39.9% loss	more than 40% loss
Negligible impact	Low magnitude impact	Medium magnitude impact	High magnitude impact

Figure 28 – Categorisation of magnitudes of effect

- 11.9 The methodology and criteria used for the assessment are based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:
- Vertical Sky Component (VSC) – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
 - *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.*
 - No Sky Line (NSL), also known as Daylight Distribution (DD) – This relates to daylight penetration into a room. The area at desk level ("a working plane") inside a room that will have a direct view of the sky.
 - *The NSL figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).*
 - Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground

across the whole year and also as a measure over the winter period. The main focus is on living rooms.

- The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.
- The overshadowing of open spaces is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on Ground assessment has been undertaken which uses the BRE methodology.
- The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March; if below that the area which can receive some sun on the 21st March should not be reduced to less than 0.8 times its former value.

11.10 The map below in Figure 25 shows the location of the surrounding properties tested. Not all properties have been tested and testing of all nearby properties is not considered necessary as those which have been tested can be used as a guide for untested properties in a similar location. The tested properties have been assessed in terms of daylight for both VSC (Vertical Sky Component) and NSL (No Sky Line) and with regards to sunlight for APSH (Annual Probable Sunlight Hours).

11.11 In analysing the submitted DSOR it is relevant to note that the separation of the proposed building from existing properties is relatively large for a dense urban environment. The site is separated from the buildings on the north of Dorrington Street (Evelyn's Buildings, Langdale House, and 17-29 Leather Lane) by 30 metres and from the buildings on the eastern side of Leather Lane (nos. 16, 18, 20-22 and 24-26) by up to 15 metres. It is also relevant to note that the overall height of the building would not change significantly as part of this proposal, with its overall height increasing by 3.8m metres from 48.2m to 52m.



Figure 25: Location of buildings analysed for day/sunlight impacts.

- 11.12 In terms of VSC only one of the windows surveyed would fail the BRE guidelines. There would be a medium (38.89% loss) impact to one window (W8 to Baldwin's Gardens) which already experiences a very low degree of daylight. Furthermore, the other window to the same room (W7) would not be significantly affected (5% loss only) and thus it would still receive a reasonable degree of daylight for an urban area. All other properties would experience a negligible VSC impact in accordance with the BRE guidelines.
- 11.13 In terms of NSL most nearby homes would experience a negligible impact according to the BRE guidelines, with only 15 rooms experiencing a 20% or greater loss of NSL. 1-12 Cranley Buildings (8 rooms) and Evelyn's Buildings (7 rooms) would be most affected. No room would experience a loss of 30% or greater, which means all rooms failing to meet the BRE guidelines for NSL would experience only a low loss of daylight penetration on the working plane (i.e. desk level).
- 11.14 It is notable that all of the residential accommodation assessed would retain good daylight values against at least one of either the VSC or NSL tests, and that where impacts are beyond the BRE guidelines these impacts are considered to be low. As such, the development proposal would not cause an unacceptable level of harm in terms of its daylight impact on nearby residents.
- 11.15 In terms of ASPH, reductions in annual sunlight levels would be generally low to all properties with reductions mostly well below 10%. Some properties, such as at 2 Greville Street (specifically rooms R4/92, R4/93 and R4/94) receive significantly improved daylight levels. Room R5 to Baldwin's Gardens and four rooms to 1-12 Cranley Buildings, would receive annual sunlight losses of between 20-30% which is considered to be either a low impact or at the very low end of the medium level of impact. Where losses to annual sunlight levels are beyond the thresholds of the BRE guidelines the loss of winter sunlight levels would be zero. Where winter sunlight losses are beyond 20% the annual sunlight levels do not exceed a 10% (very low level) reduction. Therefore, the development would not cause an unacceptable level of harm at nearby properties in terms of an overall loss of sunlight.
- 11.16 Overshadowing of Brooke's Market open space would increase by 50% on 21st March, which is beyond BRE guidelines. This space is already significantly overshadowed by existing buildings and tree planting on all sides and as such on 21st March currently just 12% of this open space receives two hours of sunlight. This would reduce to 6%. The situation would be made a bit worse by the proposal. However, the open space already has a transient character that is predominantly hardstanding no benches or lawn areas where an individual or group may wish to spend a long period of time enjoying sunlight. As such, the level of sunlight received is considered appropriate and reasonable for the specific characteristics of this open area. Furthermore, it should be noted that in periods of hot weather shaded

spaces can be considered desirable. During summer months this space would still continue to receive 2 hours of sunlight..

- 11.17 This space is likely to be subject to public realm improvements in the near future. This proposal would provide a financial contribution towards improving this open space, secured by legal agreement, and any future design proposals would consider both improving and responding to access to sunlight in the context of the layout of the space and the wishes of local residents.
- 11.18 As such, the impact on local amenity due to increased overshadowing would be low in this case as the usability of Brooke's Market open space would not significantly change, this open space would still receive reasonable levels of sunlight for its anticipated use throughout the year and the applicant would contribute financially towards appropriate design and layout improvements to this space in the future.

Outlook and Privacy

- 11.19 The locations of the external façades for the proposed development would be in very similar locations to the external façades of the existing building. Furthermore, the total height of the building would increase by just 3.8 metres. There would be some infilling of current recessed areas on the upper floors, but this would not be significant enough to lead to excessive increases in the massing of the building. Therefore, as the scale and massing of the building would not change significantly, it is considered that there would be no significant loss of outlook to nearby properties.
- 11.20 Similarly in terms of the proposed development's impact on the privacy of nearby residents the building's windows on all sides would not be significantly closer to existing residential properties and amenity areas. Furthermore, the proposed office use of the upper floors of the development would be the same as that of the existing building. On many floors the width of individual window apertures would reduce which would help to reduce the potential for overlooking. There would be additional terrace areas on the proposed building though these would be located at a high enough level of the building (fifth floor and above) and set away from site boundaries so that direct overlooking into the windows and amenity areas of nearby residential properties would not be significant. As such, it is considered that there would be no significant loss of privacy to nearby properties.

Noise

- 11.21 A Noise and Vibration Impact Assessment was submitted which assesses the noise impacts associated with the proposed development. This document was reviewed by the Council's Environmental Health Officer.

- 11.22 External plant equipment associated with the proposed development would comprise of four air source heat pumps and two chillers to be located at roof level on 2 and 3 Waterhouse Square. Emergency plant would comprise a single diesel generator for life-safety functions. This would be located within the loading bay at ground floor level and ducted through the northern façade and has been approved in June 2023 as part of planning application and listed building consent refs. 2023/1376/P and 2023/1807/L.
- 11.23 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, Camden's Local Plan 2017 and BS 4142:2014 "Methods for rating and assessing industrial and commercial sound". The submitted plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 11.24 The assessment indicates that the proposed installation should be capable of achieving "Low Observed Adverse Effect Level (LOAEL) of the NPSE and NPPG and achieves the aims of National Planning Policy Framework (NPPF)" at the nearest and potentially most affected noise sensitive receptors. The Environmental Health Officer is satisfied with the proposal in terms of the predicted noise outcomes. Conditions [Conditions 13-17] will be secured that ensure noise from plant, machinery and other equipment shall not exceed existing background levels and in order to appropriately regulate the use and testing of any emergency equipment.
- 11.25 Operational noise associated with the proposed office use is anticipated to be low and not significantly in excess of that which is emitted from the existing uses on site. The hours of use of the proposed terrace areas would be restricted to prevent late night use and this can be secured by condition [Condition 7]. The ground floor uses are not anticipated to be particularly noise creating, given the location of the site in the Central London Area and adjacent to a local centre which already features pubs and restaurants. Although one of the proposed commercial units has the potential to be used as a drinking establishment, such uses are not uncommon in the local area and the unit would be relatively small in size, which would necessarily limit the number of patrons. Management of the premises would be controlled by licensing legislation. Hours of use of all commercial units would be controlled by condition [Condition 6].

Conclusion

- 11.26 An assessment of the amenity impacts on neighbouring properties has been undertaken. The relatively limited loss of daylight and sunlight to some residential properties would not cause an unacceptable level of harm to nearby residents. It is relevant to note in this context that the daylight or sunlight conditions to some properties would improve. The scheme has also been designed to minimise the loss of privacy and outlook to neighbouring properties. The overshadowing of Brooke's

Market open space would increase to a degree in excess of BRE guidelines. However, this space is already significantly overshadowed and improvements to the design and layout of this space have been secured through a financial contribution. Design measures to increase sunlight to this open space would form a part of those future public realm improvements. The proposals are also acceptable in terms of noise impact, subject to conditions.

12 SUSTAINABLE DESIGN AND CONSTRUCTION

- 12.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.
- 12.2 Camden Local Plan policies CC1, CC2, CC3, and CC4 state that development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.
- 12.3 A Sustainability Statement and Planning Report (on the building's structure) have been submitted with this application. Further information on sustainability is also provided in the Design and Access Statement.

Whole life carbon and circular economy

- 12.4 Camden Local Plan policy CC1 requires proposals to optimise resource efficiency, including calculation of whole life-cycle carbon emissions and demonstration of actions taken to reduce life-cycle carbon emissions so these impacts can be considered in assessing a proposal. Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal.
- 12.5 Part of the building would be demolished, whilst the rest is retained, refurbished and extended at roof level. The proposed development would retain the steel frame and foundations of the existing building, which equates to 83% of the existing structure volume. The removal of some floorspace is required to improve access arrangements to all floors via upgraded building cores and to improve daylighting as part of the wider sustainability and longevity improvements to the existing building. Removal of some floorspace also enables a new arched entrance a courtyard to be provided which is a prominent and welcoming entrance to the building that is supported in design terms.

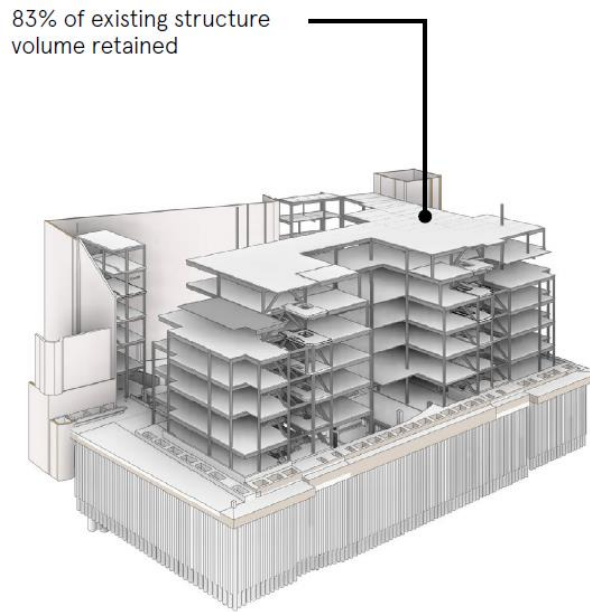


Figure 26: 83% of the existing structure volume would be retained, including the steel frame and foundations.

12.6 The existing façade is unable to be retained as part of these comprehensive building improvements. An upgraded façade in high-performance contemporary materials would be provided instead. As well as having a beneficial visual impact on the public realm, as described in the design section above, the new façade would provide sustainability and longevity improvements to the building through minimising water ingress and facilitating improvements in heat management through reductions in heat gains and heat losses. The new window layout has been designed to maximise natural light whilst also minimising solar gain in summer. The façade replacement would also facilitate comprehensive provision of new mechanical and engineering systems, allied to other design and security improvements such as the provision of an active ground floor frontage.

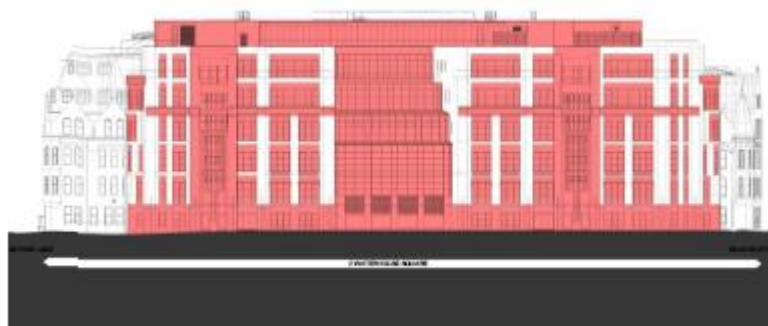


Figure 27. The internal layout and building quality improvements, including new cores, raised floor levels and active ground floor frontages, necessitate the removal of most of the existing granite cladding (areas removed in red).

Figure 28. The 'planning scheme' (Scenario 4 in the chart above) is the most carbon efficient development option of the four scenarios tested. All of the others include retention of the façade.

- 12.7 The Sustainability Statement submitted with the application shows that the carbon savings from the development would be much greater than various less invasive development options over the long term. Assuming a 60 year development lifespan, the proposal (Scenario 4, see Figure 28 above) would result in at least 58 fewer kilograms of carbon dioxide than the next best scenario (Scenario 2 above). The proposed development would result in 240 fewer kilograms of carbon compared to the full façade retention option (Scenario 1) over the lifetime of the development. Without the façade being replaced in full, many of the key sustainability features of this development, such as the increased daylighting of internal floors (though relocated windows) and communal areas (though a new partially glazed archway and courtyard), increased thermal efficiency (new insulation) and glazing heating reductions (through increased U-values), would not be possible in the comprehensive manner that it is currently proposed. As such, the carbon saving would be either lost or significantly reduced.
- 12.8 As such, it is considered that the significant operational sustainability improvements to the building that would be facilitated by this proposed development justify the replacement of the building façade in this case.
- 12.9 The Council's Sustainability Officer has reviewed the submitted documentation and agrees that the extensive external interventions, allied to other internal improvements proposed, would significantly improve the building's energy performance which is subsequently reflected in lower whole life carbon values.
- 12.10 The development seeks to divert all construction and demolition waste from landfill with the vast majority of this (at least 95%) being reused or recycled. At least 20% of the material elements of the proposed development would be comprised of recycled or reused content. The Council's Sustainability Officer supports these objectives. The exact approach to management of construction and demolition waste be secured by condition [Condition 11].

Energy and carbon reductions

- 12.11 To minimise operational carbon new development should follow the energy hierarchy set out in the London Plan. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green).

12.12 On-site carbon should be reduced as much as possible.. The following summary table shows how the proposal performs against the policy targets for carbon reductions in major schemes (noting that this scheme is a minor development of less than 1,000sqm of new floorspace), as set out in the London Plan and Camden Local Plan.

Policy target (on-site)	Min. policy target	Proposed reductions
Total carbon reduction: LP policy SI2	35%	49.6%
Be lean stage (low demand): LP policy SI2 (commercial use)	15%	48.6%
Be green stage (renewables): CLP policy CC1	20%	1%

Figure 29 –Carbon saving calculations

12.13 In this case, using the up-to-date Part L 2021 carbon calculations, the development would meet the policy target for major developments as set out in the London Plan of 35% reductions, achieving an overall on-site reduction of 49.6% below Part L requirements as shown in the table above, through the installation of air source heat pumps as well as other energy efficiency measures associated with the refurbishment of this building. This is a good achievement for a minor development of less than 1,000sqm uplift in floor space. The 'be lean' target for major development is also comfortably exceeded.

12.14 It is noted that the 20% carbon reduction target for renewables (such as photovoltaic panels) would not be met. The applicant has stated that they have maximised renewable energy generation on site and are heavily restricted by the historic character of the retained buildings, the need to provide amenity space (in the form of terraces) for building users, the need for mechanical plant storage and the provision of green and blue roofs. The Council's Sustainability Officer accepts these restrictions and is supportive of the overall carbon reductions achieved, despite the development's inability to meet the policy target for renewable energy, which would generally be significantly above the policy target for major applications as described above. It is considered there may be more scope for photovoltaic panels at roof level through measures such as combining them with green/blue roofs. Further consideration of this matter can be adequately secured by condition [Condition 9] in order to bring the development closer to the 'be green' target.

Climate change adaption and sustainable design

- 12.15 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. The CPG Energy Efficiency and Adaptation sets out in section 11 an expectation for at least 60% of the available credits in Energy, 60% in Water and 40% in Materials categories to be achieved to give the greatest environmental benefits.
- 12.16 The development would exceed the BREEAM excellent 70% target (80.21%) and would also meet the energy, water and materials credits targets as required by the Council's CPG Energy Efficiency and Adaptation.
- 12.17 These targets would be secured through the S106 legal agreement.

13 AIR QUALITY

- 13.1 Camden Local Plan policy CC4 is relevant with regards to air quality. An Air Quality Assessment (AQA) has been submitted as part of this application which was assessed by the Council's Sustainability Officer.
- 13.2 The AQA included a desk study of local air quality which found that local air quality conditions are suitable for office use without further mitigation requirements. The applicant has stated that air filtration would be included as part of the development, however this is not necessary due to the current reasonable and improving good air quality levels and given it would result in reduced energy optimisation for the development as a whole. Details of filtration measures can be resolved by condition at a later date [Condition 17].
- 13.3 Emergency generators are proposed. Flues from the generators must be at least 1m above the height of the tallest building in a 20m radius. A condition [Condition 15] is attached requiring the flue to meet this requirement.
- 13.4 The proposals would be car free and the impact on local traffic activity would be negligible. Energy and hot water would be provided without the use of combustion plant. As such, the development would be neutral in terms of its transport and operational air quality impacts.
- 13.5 The Sustainability Officer has noted that there is a low risk from the development works with regard to general human health impacts and localised dust soiling. Air quality during demolition and construction would be managed through a detailed construction management plan, which will be required prior to commencement of works and is secured by S106 legal agreement as appropriate.

14 FLOOD RISK AND DRAINAGE

- 14.1 Policy CC3 is relevant with regards to flood risk and drainage. The site is located within a Flood Zone 1, which is an area that is least likely to flood. The site has a very low fluvial risk of flooding, medium surface water risk and low groundwater risk of flooding. The site is not on a previously flooded street or in a Local Flood Risk Zone.
- 14.2 The development would include sustainable drainage systems at roof level in the form of blue roofs and vegetated areas to minimise water run-off. An attenuation tank would also help with rainwater storage. Potable water use would be minimised and carefully monitored. Rainwater re-use and grey-water recycling is under consideration and further information on the adoption of such measures can be secured by conditions [Conditions 10 and 27].
- 14.3 These measures would improve drainage on the site by 74% to achieve a minimum of 76.3 l/s in a 1 in 100 rainfall event.
- 14.4 The Lead Local Flood Authority is happy with the proposals subject to conditions [Conditions 23 and 24] on SUDS and water efficiency. Given the above, the proposed measures are considered acceptable in terms of flood risk.

15 NATURE CONSERVATION, LANDSCAPE AND BIODIVERSITY

- 15.1 Camden Local Plan policies A2 and A3, and Camden CPG Biodiversity, seek to protect existing trees and secure additional tree planting and vegetation and to protect and promote biodiversity.

Trees and Landscaping

- 15.2 The site currently has a very poor natural ecology and low landscape quality. The site's roof is primarily used for plant equipment storage and other functional purposes and there are large areas of hardstanding around the site. The area in general suffers from an ecological deficiency, although there are some trees visible in the local area, notably on Brooke's Market.
- 15.3 No trees would be removed as part of the proposed development. The Council's Tree Officer has assessed the proposals and confirms that the high-value trees located off the site on Brooke's Market could be impacted upon during demolition and construction and should be protected and retained. Appropriate tree protection measures can be secured by conditions [Condition 20].
- 15.4 The development would not encroach upon Leather Lane or Brooke's Market thus retaining these areas as public spaces. The development's ground floor active uses would help increase passive surveillance over local open and public realm spaces thus improving the safety and usability of these areas.

- 15.5 The development would include several roof and terrace areas which would be secured as green and blue roofs where appropriate. Further details on the location and quality of these roofs, as well as general soft landscaping improvements on the upper levels, would be secured by conditions [Conditions 10 and 19].
- 15.6 Further conditions would also be included to secure details of appropriate biodiversity improvements, such as bird and bat boxes, and lighting controls [Conditions 21 and 22].
- 15.7 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms. The proposals would significantly enhance the natural value of the site.

16 TRANSPORT

- 16.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 16.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.
- 16.3 Camden's Transport Strategy (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets out objectives, policies, and measures for achieving this goal.
- 16.4 The Council's priorities include:
- increasing walking and cycling
 - improving public transport in the Borough
 - reducing car ownership and use
 - improving the quality of our air
 - making our streets and transport networks safe, accessible, and inclusive for all
- 16.5 In 2022, the Council reviewed its progress so far on the CTS and also set out our delivery plan for the period covering 2022/23 - 2024/25. This was presented to Cabinet on 14th December 2022. The plan includes commitments to:

- i. implement proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists via the Holborn Liveable Neighbourhood (HLN) scheme.
- ii. continue to expand our dockless bike and e-scooter hire network, and
- iii. expand significantly our Electric Vehicle Charging Point network.

16.6 Camden's Clean Air Action Plan and Climate Action Plan also contain policies which are relevant to our transport observations.

Site location and access to public transport

- 16.7 The site is located within the Hatton Garden Conservation Area to the north of Holborn (A40). The site is also bounded by Brooke Street to the west, Leather Lane to the east, Beauchamp Street to the north and Holborn to the South.
- 16.8 Holborn (A40) forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is also close to Farringdon Road, which is part of TfL's Transport for London Road Network (TLRN).
- 16.9 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). The closest London Underground stations to the site are Chancery Lane, located approximately 200m from Building 2 on A40 Holborn, Farringdon, located approximately 450m to the east of the site and Holborn located approximately 850m to the west of the site. Farringdon station also provides national rail and Elizabeth Line services. The closest bus stops to the site, Holborn Circus/Fetter Lane, are located on A40 Holborn adjacent to the site's southern boundary.
- 16.10 The site is accessible from the Strategic Cycle Network with Cycleway C6 to the east at Farringdon Road and C11 to the west at Red Lion Street. Both Cycleways link the site with Euston railway station. The nearest Santander cycle hire docking stations are located on Red Lion Street, Holborn Circus, New Fetter Lane, and Hatton Garden.
- 16.11 The Council is developing proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists. The estimated cost of delivering these proposals, which will be delivered under the Holborn Liveable Neighbourhood (HLN) scheme is currently estimated as circa £40 million including fees, subject to detailed design. Under Objective 1 of the CTS, which is to "transform our streets and places to enable an increase in walking and cycling", we have set out "investment priority" schemes – these being schemes which "identify priorities for this objective where we will require substantial additional funds, including inward investment & partnership in delivery from TfL/other relevant

organisations, in the short to medium term, to help realise these overall goals.” One of those investment priorities is “Unravelling the Holborn gyratories and reducing traffic dominance as part of an area wide ‘Liveable Neighbourhood’ project that enables active travel modes.”

- 16.12 The Council will therefore seek to secure financial contributions towards the overall scheme costs from development funding. Construction of the HLN scheme will take place as funds become available. Implementation of some changes to roads in the area are likely to start in 2024 using secured funding, with each subsequent phase of construction subject to financial approval as funding becomes available.
- 16.13 There are dedicated parking bays for dockless rental e-bikes and rental e-scooters in the area, namely on Red Lion Street and Holborn Circus. However, these bays are already showing signs of overcapacity and increasing demand. The Council has plans to expand the network of bays in the area and it is hoped that additional bays could be provided in the future via developer contributions.

Trip generation

- 16.14 The proposed development is for an overall ‘modest’ uplift in floor space of 627 sqm (GIA) to provide 29,531 sqm office space and 322 sqm retail use.
- 16.15 The proposal would be a car free development which is acceptable given the excellent availability of public transport services in this area. As such, a significant proportion of trips are expected to be taken by foot, bicycle, or public transport.
- 16.16 The anticipated high volume of the walking trips is likely to be made from London Underground stations at Chancery Lane, Farringdon (which also provides rail services) and Holborn, and from the bus stops on Holborn Circus/Fetter Lane.
- 16.17 An Active Travel Zone (ATZ) assessment has been completed. The ATZ assessment identifies several opportunities for improvements to walking and cycling environment, as follows:
- widen the pedestrian refuge island, install guard railing and repair tactile paving to reduce trip hazards on Holborn near Chancery Lane station.
 - segregated cycle lanes on Red Lion Street.
 - yellow box or a signal-controlled junction at Red Lion Street/Holborn.
 - provide tactile paving on both sides of the crossing and reinstate dropped kerbs to remove a trip hazard for pedestrians on a section of Greville Street.

- 16.18 A financial contribution towards pedestrian, cycling and other environmental improvements in the local area would be secured through s106 legal agreement and some or all of these and other public realm improvements would be secured as part of that contribution.

Travel planning

- 16.19 A draft travel plan was not submitted in support of the planning application. A travel plan targeted towards staff and visitors, outlining aims and objectives, active travel targets, action plan and monitoring can be secured by legal agreement and a financial contribution towards this, associated monitoring and other measures of £11,221 will be secured by legal agreement if planning permission is granted.

Access and permeability

- 16.20 The site is accessible to pedestrians from the north, east, south, and west. Waterhouse Square includes a pedestrianised square, which connects to Leather Lane to the north. There is a one-way system between Brooke Street and Dorrington Street. Brooke Street to the west of the site provides a vehicular route with pavements on both sides.
- 16.21 The main pedestrian accesses would be from within the courtyard of Waterhouse Square, which exists at present, and a new entrance which is proposed directly onto Greville Street.
- 16.22 The proposal would remove the existing 11 car parking spaces. No changes are proposed to the site's vehicular access from Brooke's Street which would continue to be used for servicing activity.

Cycle parking

- 16.23 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1 CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5.
- 16.24 The proposed development would provide 422 long-stay cycle parking spaces at lower ground level, accessed via two cycle lifts and two sets of shallow stairs with wheeling ramps. Showers, lockers, changing rooms and drying facilities would be provided at the basement level, directly below the cycle store, accessed via stairs and lifts. There should be a minimum spacing of 1m between Sheffield stands, and 500mm between two-tier stands. The mix and quality of cycle parking shall be secured by condition [Condition 18].
- 16.25 35 short-stay cycle parking spaces will be provided, with 16 spaces for the office use located at ground floor level. The remaining 19 spaces cannot be sited within the

site boundary and therefore the remaining short-stay spaces would be provided on the public highway at Brooke's Market or Beauchamp Street. As such, an off-site cycle parking contribution towards new on-street cycle parking of £6,000 would be secured by legal agreement.

Car parking and vehicle access

- 16.26 The site is within controlled parking zone CA-D (Kings Cross Area), which operates 08:30-18:30 Monday to Friday, 08:30-13:30 on Saturday, and not at all on Sunday.
- 16.27 Vehicular access to the site, including for service access, is from Brooke Street via A40 Holborn. The development would be car-free, which would be secured by legal agreement if planning permission were granted. The removal of 11 car parking spaces from the site is supported. However, no accessible parking space is provided for disabled vehicle users. As such, an off-site contribution of £4,000 is required for the provision of a disabled parking space in order to support users of the development with accessible parking needs. This can be secured by legal agreement.

Construction management

- 16.28 Construction management plans (CMPs) help to minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft Construction/Demolition Management Plan using the Council's CMP pro-forma has been provided with the planning application.
- 16.29 The A40 forms part of the Strategic Road Network (SRN). Traffic congestion is a significant problem in this part of the borough, particularly during peak periods and at other times throughout the day on Monday to Friday. The proposal would potentially create some short-term amenity issues for local people such as noise/vibration, dust and a temporary loss of parking. The development must be implemented in a manner that is not excessively detrimental to local amenity or the safe and efficient operation of the highway network in the local area. As such, detailed Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents must be secured by legal agreement in accordance with Local Plan policy A1.
- 16.30 The development and assessment of the DMP/CMP, as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction, will require close scrutiny by the Council and as such implementation support contributions of £29,943 and impact bonds of £31,497 for all (demolition and construction) phases of the development works will be secured by s106 legal agreement.
- 16.31 Construction vehicle movements to and from the site must be scheduled to avoid peak periods to minimise the impacts of construction on the transport network and

sensitive local receptors. St Alban's CE Primary School is located 80 metres from the site and pedestrian/vehicle movements during the morning and evening peak could also lead to avoidable impacts. As such, it will be necessary to restrict construction traffic to the hours of 9.30am and 3.00pm on weekdays. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed in advance by the Council. This shall be secured as part of the DMP/CMP secured through s106 legal agreement.

- 16.32 Once appointed, the development contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety. These matters shall be secured as part of the DMP/CMP secured through s106 legal agreement.
- 16.33 Furthermore, a construction working group consisting of representatives from the local community must be set up prior to the commencement of demolition and construction works, and shall be required to meet regularly during the development process, which shall also be secured by legal agreement.

Deliveries and servicing

- 16.34 The Transport Assessment states that deliveries and servicing for the commercial aspect of the development will continue to be from the existing loading area on the ground floor, which will be reconfigured to provide three 8m bays. Further information is required regarding servicing arrangements for the office use. Servicing (including waste collections) and deliveries would not be permitted to occur on street.
- 16.35 A detailed delivery and servicing plan for all land uses would be secured by legal agreement which will ensure that any operational impacts associated with delivery and servicing movements will be mitigated.

Pedestrian, cycling, highway and other environmental improvements

- 16.36 Given that the site is located in Holborn a financial contribution of £50,000 towards pedestrian, cycling and environmental improvements has been secured from the development. This would be secured by legal agreement. In accordance with the Council's Transport Strategy (CTS) Delivery Plan it would include a financial contribution towards introducing segregated cycle lanes on Charterhouse Street, as well as improvements to cycle/e-scooter hire capacity (see para 16.38 below) in the local area, and wider improvements to the Holborn Liveable Neighbourhood (HLN) public realm scheme.
- 16.37 The applicant is also required to provide a contribution towards improvements on Brooke's Market which are proposed as part of the draft Holborn Vision & Urban Strategy CPG. Works to Brooke's Market are expected to include high quality

paving, bin storage and other measures. A financial contribution of £60,000 towards these public realm improvements will be secured through s106 legal agreement.

- 16.38 Parking bays for dockless rental e-bikes and rental e-scooters are available nearby. However, these are already well-used and increased demand for cycle parking bays would be expected as the result of this development. Staff and visitors would be likely to use these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by bus. As such, a cycle/e-scooter hire improvements contribution would therefore be secured through legal agreement to allow the Council to provide additional capacity for rental e-bikes and e-scooters in the local area through the expansion of existing bays and the provision of additional bays.
- 16.39 The proposal would not require any physical alterations to the public highway. Damage to the public highway is possible during demolition and construction and therefore a modest highways contribution of £20,000 shall be secured by legal agreement to cover local highway improvements.

Conclusion

- 16.40 The proposed development is acceptable in terms of transport impact subject to conditions as described in the paragraphs above and the following planning obligations being secured by legal agreement:
- Travel Plan and associated monitoring and measures contribution of £11,221.
 - Car-free development.
 - Off-site contribution of £4,000 for a disabled parking space.
 - Construction management plan (CMP), and if necessary, a separate Demolition Management Plan (DMP), CMP implementation support contribution of £29,943, and CMP Impact Bond of £31,497.
 - Requirement to form a construction working group consisting of representatives from the local community.
 - Delivery and Servicing Plan.
 - Highway works contribution of £20,000.
 - Pedestrian, Cycling and Environmental Improvements contribution £50,000 (including HLN scheme, micromobility and cycle lane improvements).
 - Brooke's Market public realm improvements contribution (£60,000).
 - Off-site cycle parking contribution of £6,000 for 10 short-stay cycle parking stands with a capacity of 20 spaces.

17 SAFETY AND SECURITY

- 17.1 Camden Local Plan policy C5 and CPG1 (Design) are relevant with regards to development security objectives.

- 17.2 The Designing Out Crime Officer was consulted prior to the application being submitted and was involved in the design process. This officer raised no objections to the proposals. The scheme has been designed in accordance with Secure by Design principles.
- 17.3 The proposed design would increase passive surveillance on local streets through increased pedestrian activity and active ground floor commercial uses. The development would include CCTV cameras and security staff would patrol main access points and other parts of the new building. Details of CCTV and security would be secured by condition [Condition 28]. As such, it is anticipated that the proposed development would help to reduce anti-social behaviour in the local area through these measures.
- 17.4 The new entrance off Leather Lane would be gated in the evenings in accordance with the gate management arrangements for the existing Waterhouse Square. This arrangement would also be secured by condition [Condition 28].

18 EMPLOYMENT AND TRAINING OPPORTUNITIES

- 18.1 The proposed development would be likely to generate increased employment opportunities during the construction phase, and as such, the Council aims to ensure that local people benefit from these opportunities by securing a package of employment and training obligations through a Section 106 legal agreement.
- 18.2 The employment and training package in line with the Employment, Sites and Business Premises CPG will cover the following:
- 18.3 Apprenticeships - The applicant must recruit 1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. The applicants planning statement indicates that a minimum of one apprentice will be recruited.
- 18.4 Construction Work Experience Placements - The applicant should provide a minimum of one 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 69 of the Employment sites and business premises CPG.
- 18.5 Local Recruitment – The Council's standard local recruitment target is 20%. The applicant should work with the Kings Cross Construction Skills Centre to recruit to

vacancies, advertising with us for no less than a week before the roles are advertised more widely.

18.6 Local Procurement – The applicant must also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. Our local procurement code sets a target of 10% of the total value of the construction contract.

18.7 The scheme results in a net increase of employment floorspace of 627sqm and therefore doesn't trigger the requirement set out in the CPG for occupation phase employment and skills obligations. The applicant has also agreed to secure other provisions relating to community and market trader access to retail spaces and other facilities as appropriate, with details to be secured through s106 legal agreement and confirmed at a later date.

18.8 Overall, the employment and training proposals would meet the aims and objectives of policies E1 and E2 of the Camden Local Plan.

19 PLANNING OBLIGATIONS

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

Contribution	Amount (£)
Travel plan, monitoring and measures	£11,221
Short stay cycle parking	£6,000
Car free	n/a
Disabled parking space	£4,000
CMP implementation support	£29,943
Impact bond	£31,497
Highways	£20,000
Brooke's Market public realm	£60,000
PCE contribution (HLN, cycle lanes, and micromobility)	£50,000
Construction working group	n/a
DSP	n/a
Energy plans & BREEAM	n/a
Mixed use/housing contribution	£470,250
Apprenticeships	£1,700 (1no. apprentice per £3m build costs = 1 x £1,700)
Employment and skills initiatives	20% local recruitment

	• Local procurement code (10% of build costs to be spend locally) • End user staff to be paid London Living Wage • End user apprenticeships • STEAM objectives
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20 MAYOR OF LONDON'S CROSSRAIL CIL

20.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the addition of new office space. 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. The current Mayoral CIL rates for this site (indexing not applied) are as follows:

- Office - £185 per sqm (Central London)
- Retail - £165 per sqm (Central London)
- All other Development - £80 per sqm (Band 1 – Camden)

20.2 The above calculation is based on today being the decision and is also based on the information provided with the application. The above is an estimate only and would be subject to the verification of the proposed floor areas and calculations by the Council's CIL team.

20.3 Should the applicant consider that any deductions apply to this calculation they will need to provide completed forms for relief along with any supporting evidence.

21 CAMDEN CIL

21.1 The proposal would be liable for the Camden Community Infrastructure Levy (CIL). CIL tariff for sites located within Central Camden (Zone A) are charged at the following rates:

- Office - £110 per m²
- Hotel - £110 per m²
- Retail - £32 per m²
- Residential (10 or more dwellings) - £193 per m²
- Other commercial uses - £32 per m²

22 CONCLUSION – PLANNING AND LISTED BUILDING CONSENT APPLICATIONS

- 22.1 The application is a commercial development for partial demolition of the existing building to provide additional Class E floor space intended for use as offices and retail space and a retail/bar unit in Class E/Sui Generis use. In total, the application proposes 29,853sqm of non-residential floorspace which includes an overall floorspace uplift of 627sqm.
- 22.2 The proposed land uses are similar to those already on the site and in the local area and would increase the density and quality of the office uses as well as providing ground floor uses that activate surrounding streets, increasing commercial and pedestrian activity, improving safety and security on local streets and ensuring the vitality and viability of the existing commercial frontages. The existing market on Leather Lane would be respected and the site's relationship with it would be enhanced. It is accepted that it is not possible to provide housing on site but a full financial contribution towards affordable housing would be provided in lieu.
- 22.3 The new building would partially demolish, refurbish and extend a recent extension of no noted architectural merit. It would be of a high quality with a limited increase in height and massing, well-considered articulation and finishing materials, and the provision of active ground floor frontages. The new building would respect key local views and would appropriately contrast with the listed building, and would thus not detract from the conservation area or the setting of the listed building. The works to the listed building, including the creation of two new entrances, would help retain the building in its optimum viable use as a commercial space and thus the low level of less than substantial harm that is created by these works would be outweighed by these public benefits. It is therefore considered that propose development would, on balance, preserve the Grade II* listed Waterhouse Square, and would also preserve its setting and the character and appearance of the Hatton Garden Conservation Area..
- 22.4 The proposal would have high-quality architecture demonstrated through its well-considered composition and detailing and thus would significantly improve the experience of the urban block from the street and would enhance the public realm around the site. The design creates an open, publicly accessible, commercial ground plane with active ground floor frontages that would improve the safety and security of, and bring life to, local streets.
- 22.5 The scheme has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight, outlook, privacy, and in terms of preventing additional noise disturbance.
- 22.6 The proposed development would involve the partial demolition, refurbishment and extension of the existing extension on-site. 83% of the volume of the existing extension would be retained and the development would have a substantial carbon

saving across the lifetime of the development compared to alternative refurbishment options due to its very low energy demand. The development would also be car free would make the best use of the site in an accessible location. Officers are satisfied with the proposed development in terms of sustainability and energy use.

22.7 The building phase of the proposed development would be required to adhere to a detailed construction management plan to protect the amenity of nearby residents and would also provide financial contributions towards local public realm improvements.

22.8 As such, it is recommended that planning permission and listed building consent is granted subject to conditions and a Section 106 legal agreement.

23 RECOMMENDATIONS

23.1 Planning Permission is recommended to be granted subject to conditions and a Section 106 Legal Agreement covering the aforementioned Heads of Terms.

23.2 Listed building consent is recommended to be granted subject to conditions.

24 LEGAL COMMENTS

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

Waterhouse Square list of conditions

CONDITIONS – PLANNING APPLICATION

1	Three years from the date of this permission This development must be begun not later than three years from the date of this permission. Reason: In order to comply with the provisions of Section 92 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: Existing Plans and Drawings (all Rev. C01 unless specified): WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan WHS-ORM-2W-04-DR-A-12504 Existing General Arrangement Fourth Floor Plan WHS-ORM-2W-05-DR-A-12505 Existing General Arrangement Fifth Floor Plan WHS-ORM-2W-06-DR-A-12506 Existing General Arrangement Sixth Floor Plan WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan

	WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A
	WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan
	WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B
	WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C
	WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D
	WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation
	WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E
	WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan
	WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation
	WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation
	WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation
	Proposed Plans and Drawings (all Rev. C01 unless specified):
	WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan
	WHS-ORM-2W-00-DR-A-12600 (Rev. C02) Proposed Demolition Ground Floor Plan
	WHS-ORM-2W-00-DR-A-12700 (Rev. C04) Proposed General Arrangement Ground Floor Plan
	WHS-ORM-2W-01-DR-A-12601 Proposed Demolition First Floor Plan
	WHS-ORM-2W-01-DR-A-12701 (Rev. C02) Proposed General Arrangement First Floor Plan
	WHS-ORM-2W-02-DR-A-12602 Proposed Demolition Second Floor Plan
	WHS-ORM-2W-02-DR-A-12702 (Rev. C02) Proposed General Arrangement Second Floor Plan
	WHS-ORM-2W-03-DR-A-12603 Proposed Demolition Third Floor Plan
	WHS-ORM-2W-03-DR-A-12703 (Rev. C02) Proposed General Arrangement Third Floor Plan

WHS-ORM-2W-04-DR-A-12604 Proposed Demolition Fourth Floor Plan
WHS-ORM-2W-04-DR-A-12704 (Rev. C02) Proposed General Arrangement Fourth Floor Plan
WHS-ORM-2W-05-DR-A-12605 Proposed Demolition Fifth Floor Plan
WHS-ORM-2W-05-DR-A-12705 (Rev. C02) Proposed General Arrangement Fifth Floor Plan
WHS-ORM-2W-06-DR-A-12606 Proposed Demolition Sixth Floor Plan
WHS-ORM-2W-06-DR-A-12706 (Rev. C02) Proposed General Arrangement Sixth Floor Plan
WHS-ORM-2W-07-DR-A-12707 (Rev. C02) Proposed General Arrangement Seventh Floor Plan
WHS-ORM-2W-AA-DR-A-12140 Proposed Planning Section A-A
WHS-ORM-2W-B1-DR-A-12699 Proposed Demolition Basement 1 Plan
WHS-ORM-2W-B1-DR-A-12799 (Rev. C02) Proposed General Arrangement Basement 1 Plan
WHS-ORM-2W-BB-DR-A-12141 Proposed Planning Section B-B
WHS-ORM-2W-CC-DR-A-12142 Proposed Planning Section C-C
WHS-ORM-2W-DD-DR-A-12143 Proposed Planning Section D-D
WHS-ORM-2W-EA-DR-A-12349 Proposed Planning Bay Study 10
WHS-ORM-2W-EA-DR-A-12350 Proposed Planning Bay Study 11
WHS-ORM-2W-EA-DR-A-12351 Proposed Planning Bay Study 12
WHS-ORM-2W-EA-DR-A-12352 Proposed Planning Bay Study 13
WHS-ORM-2W-EA-DR-A-12372 (Rev. C02) Proposed Planning R7 Heritage Block East Facade
WHS-ORM-2W-EE-DR-A-12144 Proposed Planning Section E-E
WHS-ORM-2W-LG-DR-A-12698 Proposed Demolition Lower Ground Floor Plan
WHS-ORM-2W-LG-DR-A-12798 (Rev. C02) Proposed General Arrangement Lower Ground Floor Plan
WHS-ORM-2W-NO-DR-A-12330 Proposed Planning North Elevation

WHS-ORM-2W-NO-DR-A-12331 (Rev. C03) Proposed Planning East Elevation
WHS-ORM-2W-NO-DR-A-12340 Proposed Planning Bay Study 01
WHS-ORM-2W-NO-DR-A-12341 Proposed Planning Bay Study 02
WHS-ORM-2W-NO-DR-A-12342 Proposed Planning Bay Study 03
WHS-ORM-2W-NO-DR-A-12343 Proposed Planning Bay Study 04
WHS-ORM-2W-NO-DR-A-12344 Proposed Planning Bay Study 05
WHS-ORM-2W-NO-DR-A-12345 Proposed Planning Bay Study 06
WHS-ORM-2W-NO-DR-A-12346 Proposed Planning Bay Study 07
WHS-ORM-2W-NO-DR-A-12347 Proposed Planning Bay Study 08
WHS-ORM-2W-NO-DR-A-12348 Proposed Planning Bay Study 09
WHS-ORM-2W-NO-DR-A-12371 Proposed Planning R7 Heritage Block North Facade
WHS-ORM-2W-RF-DR-A-12607 Proposed Demolition Roof Plan
WHS-ORM-2W-SO-DR-A-12332 Proposed Planning South Elevation
WHS-ORM-2W-SO-DR-A-12353 Proposed Planning Bay Study 14
WHS-ORM-2W-SO-DR-A-12370 Proposed Planning R6 Heritage Block South Facade
WHS-ORM-2W-WE-DR-A-12333 Proposed Planning West Elevation
WHS-ORM-2W-WE-DR-A-12354 Proposed Planning Bay Study 15
WHS-ORM-2W-WE-DR-A-12355 Proposed Planning Bay Study 16
WHS-ORM-2W-ZZ-DR-A-12360 Proposed Planning Entrance Elevations
Supporting Documentation:
Design and Access Statement, and Townscape Assessment (July 2023)
Planning Statement (November 2023)
Planning Report (July 2023)
Noise Impact Assessment (July 2023)

	Sustainability Statement (August 2023) Daylight, Sunlight and Overshadowing Report (July 2023) Construction/Demolition Management Plan (July 2023) Transport Assessment (July 2023) Heritage Assessment (July 2023) Statement of Community Involvement (August 2023) Operational Waste Management Strategy (July 2023) Drainage Strategy Report (October 2023) Air Quality Assessment (October 2023) Active Travel Zone Assessment Technical Note (November 2023) Reason: For the avoidance of doubt and in the interest of proper planning.
3	Matching materials All new external work to the listed parts of 2 Waterhouse Square shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application. Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.
4	Detailed drawings/samples Prior to commencement of development (with the exception of demolition, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority: a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors and canopies b) Plan, elevation and section drawings, of all ground floor facades at a scale of 1:10;

	c) Typical plan, elevation and section drawings of balustrading to terraces and balconies; d) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and sample panels at a minimum of 1mx1m of those materials (to be provided on site). e) Details of cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof terrace levels; f) Typical elevation (minimum 2m x 2m in size) of each building including a glazed opening showing reveal and header detail and facing materials g) Details of relevant gates, railings, doors and louvres on all parts of the building which face the public realm. The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works for the relevant building. Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.
5	External fixtures 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, without the prior approval in writing of the Council. Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of Camden Local Plan policies D1 and D2.
6	Hours of Use – Commercial Uses

	The ground floor uses hereby permitted shall not be carried out outside the following times: 08:00 to 23:00 Mondays to Saturdays and 08:00 to 22:00 on Sundays and Bank Holidays. 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.
7	House of Use – Terraces The external terraces for the proposed Class E use as shown on the approved drawings shall not be used outside of 08.00 to 21.00 hours Mondays to Saturdays. Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies D1, A1 and A4 of the London Borough of Camden Local Plan 2017.
8	Carbon reductions (a) Prior to commencement of development (with the exception of demolition) the development hereby approved shall submit an energy statement to the Local Planning Authority to be approved in writing demonstrating how reductions in carbon dioxide emissions at 'Be Green' have been maximised and a minimum 49.6% reduction in beyond Part L 2021 Building Regulations in line with the energy hierarchy has been achieved. (b) Prior to first occupation of the development hereby approved evidence demonstrating that the approved measures have been implemented shall be submitted to and approved in writing by the Local Planning Authority and these measures shall be retained and maintained for the lifetime of the development.

	Reason: To ensure the development contributes to minimising the effects of and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan 2017.
9	Solar PV panels Prior to commencement of development (with the exception of demolition), drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall be submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter. 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.
10	PVs and green/blue roof co-location Prior to commencement of development (with the exception of demolition), a feasibility assessment with the aim of maximising the provision of solar photovoltaics and green and blue roofs should be submitted to the local planning authority and approved in writing. The building shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter. Reason: To ensure the development provides adequate on-site renewable energy facilities and contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.
11	Resource and waste management Prior to commencement of development, a resource and waste management plan shall be submitted to and agreed in writing by the local planning authority. This shall include a pre-demolition audit and shall demonstrate how a minimum

	of 95% of construction and demolition waste will be reused/recycled/recovered. The development shall thereafter be delivered in accordance with the approved details. Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan 2017.
12	Non-road mobile machinery No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register). Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.
13	Plant noise The external noise levels emitted from plant, machinery and/or equipment shall ensure that the rating level of the noise emitted from the proposed installation located at the site shall not exceed the existing background level at any noise sensitive premises when measured and corrected in accordance with BS4142:2014 +A1:2019 "Methods for rating and assessing industrial and commercial sound." with all machinery operating together at maximum capacity. Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.
14	Anti-vibration Prior to their first use and machinery, plant or equipment required for the development hereby approved shall be mounted with proprietary anti-vibration

	isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such thereafter. Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.
15	Back-up generators Prior to commencement of development (with the exception of demolition) the details of the proposed Emergency Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, with alternatives to diesel or oil fully considered and testing minimised. The flue from the generators shall be at least 1 metre above the height of the tallest building in a 20m radius. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications. Details of emission certificates by an accredited MCERTS organisation shall be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State. Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017.
16	Emergency plant Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24-hour LA90, 15 mins) by more than 10 dB one metre outside any premises, and shall be operated only for essential testing, except when required due to an emergency loss of power. Testing of the emergency plant and generators hereby permitted may be carried out for up to one hour only in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.

	Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017
17	Mechanical Ventilation Prior to commencement of development (with the exception of demolition) the full details of the mechanical ventilation system including air inlet locations and confirmation of any filtration measures shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details. Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan 2017 Policy CC4.
18	Cycle parking Prior to the commencement of development (with the exception of demolition) the details of the bicycle parking layout and access arrangements for the development hereby approved shall be submitted to the Local Planning Authority for its written approval. The following bicycle parking spaces and arrangements shall be shown: • 422 long-stay and 16 short-stay spaces • Details of stands which should include a mix of Sheffield and two-tier stands and spaces for larger cycles to be parked • Locations of showers, lockers, changing and drying facilities • Lift, door, wheeling ramp and other access arrangement details The approved facilities shall be provided in their entirety prior to first occupation of the development and thereafter be permanently maintained and retained.

	Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Camden Local Plan policies T1 and T2, and CPG Transport.
19	Landscaped areas No development (with the exception of demolition) shall take place until full details of hard and soft landscaping of all terrace areas within the development have been submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the approved details and maintained as such thereafter. Any trees or areas of planting within the development site 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. Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.
20	Tree Protection Strategy Prior to the commencement of any works on site details demonstrating how trees to be retained in the local area 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 near to the site shall be retained and protected from damage in accordance with the approved tree protection details. 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.
21	Bird and bat boxes Prior to commencement of development (with the exception of demolition), a plan detailing bird and bat box locations and types 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 permanently retained. 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 the London Plan and policy A3 of the Camden Local Plan 2017.
22	Lighting Prior to the commencement of development (with the exception of demolition) details of the proposed lighting scheme, to include a lux levels plan, shall be submitted to and approved in writing by the Local Planning Authority. The approved lighting scheme and mitigation measures should be implemented in accordance with the approved details prior to occupation and retained and maintained as such thereafter. Reason: In the interest of ecology, visual amenity and promoting a safe and secure environment in accordance with policies A1, A2, A3 and C5 of the Camden Local Plan 2017.
23	SuDS: Construction in accordance with details The sustainable drainage system as approved in Drainage Strategy Report, Rev. 05 November 2023 by Heyne Tillett Steel 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 76.3 l/s run-off rates in a 1:100 year storm with a 40% provision for climate change (74% betterment in existing run-off rates). The system shall include volumes of at least 355.89m³ of blue roofs and an attenuation tank of 74.6m³ as stated in the approved document and drawings and shall thereafter be retained and maintained in accordance with the approved maintenance plan. 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 2017.
24	SuDS: Evidence of installation Prior to occupation, evidence that the system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan by a named maintenance owner. 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 2017.
25	Secured by Design Prior to commencement of development (with the exception of demolition) evidence shall be submitted to the Local Planning Authority to be agreed in writing demonstrating the ability of the plans to meet secured by design accreditation, or justification submitted in any respect where the accreditation requirements cannot be met. Secured by design measures shall be implemented in accordance with the relevant accreditation achieved for the development prior to first occupation and the measures maintained in accordance with the approved details. Reason: To ensure the proposals are safe and secure in accordance with policy C5 of the Camden Local Plan 2017.

26	Air Source Heat Pumps Prior to commencement of development (with the exception of demolition) details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more) and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. 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. 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.
27	Rain/greywater harvesting Prior to commencement of development (with the exception of demolition) a feasibility assessment for rainwater/greywater recycling should be submitted to and approved in writing by the local planning authority. If considered feasible, details shall be submitted to the local authority and approved in writing prior to the commencement of above ground works. The development shall thereafter be constructed in accordance with the approved details. Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.
28	CCTV and security measures

	Prior to commencement of development (with the exception of demolition) details of locations and management of CCTV cameras at entrances to the development and around the building works hereby approved shall be submitted to the Local Planning Authority for its written approval. Details shall also be submitted of the design, siting, hours of opening/closing and other relevant management arrangements for gates to new entrances that form part of the development hereby approved. Once agreed in writing, the development shall thereafter be constructed and managed in accordance with the approved details. Reason: To ensure the development is well-designed and is safe and secure in accordance with policies A1 and C5 of the Camden Local Plan 2017.
29	For the avoidance of doubt and notwithstanding any details shown on the drawings hereby approved the ground floor unit facing onto Leather Lane shall only be used for activities within the Class E use class and for no other purposes including as a bar or other form of drinking establishment. Reason: To comply with Policy A1 of the Camden Local Plan 2017.

INFORMATIVES – PLANNING APPLICATION

1	Legal agreement Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
2	CIL This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.
2	Non-road mobile machinery Non-road mobile machinery (NRMM) is any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The Emissions requirements are only applicable to NRMM that is powered by diesel, including diesel hybrids. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit "http://nrmm.london/".
3	Air Quality Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.

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

	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. Further restrictions to these times may be required by the approved Demolition/Construction Management Plans. 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.
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CONDITIONS – LISTED BUILDING CONSENT

1	Three years from the date of this permission This development must be begun not later than three years from the date of this permission. Reason: In order to comply with the provisions of Section 92 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: Existing Plans and Drawings (all Rev. C01 unless specified): WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan WHS-ORM-2W-04-DR-A-12504 Existing General Arrangement Fourth Floor Plan WHS-ORM-2W-05-DR-A-12505 Existing General Arrangement Fifth Floor Plan WHS-ORM-2W-06-DR-A-12506 Existing General Arrangement Sixth Floor Plan WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A

	WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan
	WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B
	WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C
	WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D
	WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation
	WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E
	WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan
	WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation
	WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation
	WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation
	Proposed Plans and Drawings (all Rev. C01 unless specified):
	WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan
	WHS-ORM-2W-00-DR-A-12600 (Rev. C02) Proposed Demolition Ground Floor Plan
	WHS-ORM-2W-00-DR-A-12700 (Rev. C04) Proposed General Arrangement Ground Floor Plan
	WHS-ORM-2W-01-DR-A-12601 Proposed Demolition First Floor Plan
	WHS-ORM-2W-01-DR-A-12701 (Rev. C02) Proposed General Arrangement First Floor Plan
	WHS-ORM-2W-02-DR-A-12602 Proposed Demolition Second Floor Plan
	WHS-ORM-2W-02-DR-A-12702 (Rev. C02) Proposed General Arrangement Second Floor Plan
	WHS-ORM-2W-03-DR-A-12603 Proposed Demolition Third Floor Plan
	WHS-ORM-2W-03-DR-A-12703 (Rev. C02) Proposed General Arrangement Third Floor Plan
	WHS-ORM-2W-04-DR-A-12604 Proposed Demolition Fourth Floor Plan

WHS-ORM-2W-04-DR-A-12704 (Rev. C02) Proposed General Arrangement Fourth Floor Plan
WHS-ORM-2W-05-DR-A-12605 Proposed Demolition Fifth Floor Plan
WHS-ORM-2W-05-DR-A-12705 (Rev. C02) Proposed General Arrangement Fifth Floor Plan
WHS-ORM-2W-06-DR-A-12606 Proposed Demolition Sixth Floor Plan
WHS-ORM-2W-06-DR-A-12706 (Rev. C02) Proposed General Arrangement Sixth Floor Plan
WHS-ORM-2W-07-DR-A-12707 (Rev. C02) Proposed General Arrangement Seventh Floor Plan
WHS-ORM-2W-AA-DR-A-12140 Proposed Planning Section A-A
WHS-ORM-2W-B1-DR-A-12699 Proposed Demolition Basement 1 Plan
WHS-ORM-2W-B1-DR-A-12799 (Rev. C02) Proposed General Arrangement Basement 1 Plan
WHS-ORM-2W-BB-DR-A-12141 Proposed Planning Section B-B
WHS-ORM-2W-CC-DR-A-12142 Proposed Planning Section C-C
WHS-ORM-2W-DD-DR-A-12143 Proposed Planning Section D-D
WHS-ORM-2W-EA-DR-A-12349 Proposed Planning Bay Study 10
WHS-ORM-2W-EA-DR-A-12350 Proposed Planning Bay Study 11
WHS-ORM-2W-EA-DR-A-12351 Proposed Planning Bay Study 12
WHS-ORM-2W-EA-DR-A-12352 Proposed Planning Bay Study 13
WHS-ORM-2W-EA-DR-A-12372 (Rev. C02) Proposed Planning R7 Heritage Block East Facade
WHS-ORM-2W-EE-DR-A-12144 Proposed Planning Section E-E
WHS-ORM-2W-LG-DR-A-12698 Proposed Demolition Lower Ground Floor Plan
WHS-ORM-2W-LG-DR-A-12798 (Rev. C02) Proposed General Arrangement Lower Ground Floor Plan
WHS-ORM-2W-NO-DR-A-12330 Proposed Planning North Elevation
WHS-ORM-2W-NO-DR-A-12331 (Rev. C03) Proposed Planning East Elevation

WHS-ORM-2W-NO-DR-A-12340	Proposed Planning Bay Study 01
WHS-ORM-2W-NO-DR-A-12341	Proposed Planning Bay Study 02
WHS-ORM-2W-NO-DR-A-12342	Proposed Planning Bay Study 03
WHS-ORM-2W-NO-DR-A-12343	Proposed Planning Bay Study 04
WHS-ORM-2W-NO-DR-A-12344	Proposed Planning Bay Study 05
WHS-ORM-2W-NO-DR-A-12345	Proposed Planning Bay Study 06
WHS-ORM-2W-NO-DR-A-12346	Proposed Planning Bay Study 07
WHS-ORM-2W-NO-DR-A-12347	Proposed Planning Bay Study 08
WHS-ORM-2W-NO-DR-A-12348	Proposed Planning Bay Study 09
WHS-ORM-2W-NO-DR-A-12371	Proposed Planning R7 Heritage Block North Facade
WHS-ORM-2W-RF-DR-A-12607	Proposed Demolition Roof Plan
WHS-ORM-2W-SO-DR-A-12332	Proposed Planning South Elevation
WHS-ORM-2W-SO-DR-A-12353	Proposed Planning Bay Study 14
WHS-ORM-2W-SO-DR-A-12370	Proposed Planning R6 Heritage Block South Facade
WHS-ORM-2W-WE-DR-A-12333	Proposed Planning West Elevation
WHS-ORM-2W-WE-DR-A-12354	Proposed Planning Bay Study 15
WHS-ORM-2W-WE-DR-A-12355	Proposed Planning Bay Study 16
WHS-ORM-2W-ZZ-DR-A-12360	Proposed Planning Entrance Elevations
Supporting Documentation:	
Design and Access Statement, and Townscape Assessment (July 2023)	
Planning Statement (November 2023)	
Planning Report (July 2023)	
Noise Impact Assessment (July 2023)	
Sustainability Statement (August 2023)	

	Daylight, Sunlight and Overshadowing Report (July 2023) Construction/Demolition Management Plan (July 2023) Transport Assessment (July 2023) Heritage Assessment (July 2023) Statement of Community Involvement (August 2023) Operational Waste Management Strategy (July 2023) Drainage Strategy Report (October 2023) Air Quality Assessment (October 2023) Active Travel Zone Assessment Technical Note (November 2023) Reason: For the avoidance of doubt and in the interest of proper planning.
5	Detailed drawings/samples Detailed drawings, or samples of materials as appropriate, in respect of the following elements of the works to the listed building, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun: a) Details of all proposed new architectural features including cornices, skirtings, fireplaces and surrounds b) Plan, elevation and section drawings of all new internal doors at a scale of 1:10 with typical moulding and architrave details at a scale of 1:1. c) Plan, elevation and section drawings, including jambs, head and cill, of all proposed new and replacement external window and door openings. d) Plan, elevation and section drawings of all new windows at a scale of 1:10 with typical glazing bar details at 1:1. A schedule is required showing window design, details, and opening mechanism for traditional sash casements. e) Details of any proposed new roof finishes and proposed rainwater goods. Reason: To safeguard the historic appearance and character of the building in accordance with the requirements of Camden Local Plan 2017 Policy D2.
6	Method Statement

	A method statement of any external repairs including repointing shall be submitted to and approved by the Local Planning Authority prior to commencement of such works. Reason: To safeguard the historic appearance and character of the building in accordance with the requirements of Camden Local Plan 2017 Policy D2.
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Appendix 4B – Printed Minutes for 14th December Committee

THE LONDON BOROUGH OF CAMDEN

At a meeting of the **PLANNING COMMITTEE** held on **THURSDAY, 14TH DECEMBER, 2023** at 7.00 pm in Council Chamber, Town Hall, Judd Street, London WC1H 9JE

MEMBERS OF THE COMMITTEE PRESENT

Councillors Heather Johnson (Chair), Edmund Frondigoun (Vice-Chair), Lotis Bautista, Danny Beales, Tommy Gale, Lloyd Hatton, Liam Martin-Lane and Tom Simon

MEMBERS OF THE COMMITTEE ABSENT

Councillors Sagal Abdi-Wali, Nasrine Djemai, Andrew Parkinson and Sue Vincent

The minutes should be read in conjunction with the agenda for the meeting. They are subject to approval and signature at the next meeting of the Planning Committee and any corrections approved at that meeting will be recorded in those minutes.

MINUTES

1. APOLOGIES

Apologies for absence were received from Councillors Sagal Abdi-Wali and Sue Vincent.

2. DECLARATIONS BY MEMBERS OF STATUTORY DISCLOSABLE PECUNIARY INTERESTS, COMPULSORY REGISTERABLE NON-PECUNIARY INTERESTS AND VOLUNTARY REGISTERABLE NON-PECUNIARY INTERESTS IN MATTERS ON THIS AGENDA

There were no such declarations.

3. ANNOUNCEMENTS

Webcasting

The Chair announced that the meeting was being broadcast live to the internet and would be capable of repeated viewing and copies of the recording could be made available to those that requested them. Those seated in the Chamber were deemed to be consenting to being filmed. Anyone wishing to avoid appearing on the webcast should move to one of the galleries.

Order of Business

The Chair also announced that a request was received to hear Agenda Item 7(3) as the first substantive item, as such the Committee considered the application in respect of 55 Tottenham Court Road W1T 2EL & 16-24 Whitfield Street London W1T 2RA first.

4. REPRESENTATIONS TO THE COMMITTEE

RESOLVED –

THAT the written submissions and deputation requests contained in the supplementary agenda be accepted.

5. NOTIFICATION OF ANY ITEMS OF BUSINESS THAT THE CHAIR DECIDES TO TAKE AS URGENT

There was no such business.

6. MINUTES

Consideration was given to the Minutes of the previous meeting.

RESOLVED –

THAT the Minutes of the meeting held on 30th October 2023 be agreed and signed as an accurate record of the meeting.

7. PLANNING APPLICATIONS

Consideration was given to the report of the Executive Director Supporting Communities.

7(1) 2 WATERHOUSE SQUARE, 140 HOLBORN LONDON EC1N 2ST &

7(2) RELATED APPLICATION

Consideration was also given to the information provided in the Supplementary Agenda, and the written submissions and deputation requests referred to in Agenda Item 5 above.

The Planning Officer introduced the application and notified members that late objections had been received from Councillor Awale Olad, Ward Councillor for Holborn and Covent Garden and from a local resident.

The Planning Officer responded to a question about the calculation of the mixed use policy housing contribution of £470,250 by explaining that the contribution was based on floorspace and was calculated using the standard formula that was set out in Camden Planning Guidance. The Head of Development Management added that the formula was set out in guidance as a response to Policy H2, and specified that the commercial floorspace uplift, which for the scheme was 632 square metres, had been used alongside a set figure to work out the payment-in-lieu.

The Applicant Team responded to questions from Members, setting out their view as follows:

- The application had proposed a flexible space, that could accommodate any commercial Class E use or a bar which was outside a use class and was referred to as Sui Generis.
- There would be a significant period of time until completion, so the applicant felt that they needed flexibility for this space and added that a bar could be positive for the area in the context of it being in a central London location.
- As for mitigating the impact on residents, the flexible space was not in the immediate vicinity of the rough sleeper accommodation and controls on its operation would be in place via the licensing regime, should it be used as a bar.
- In terms of consultation, engagement had been underway since the spring, and since that time around 70 individuals had been directly communicated with via email and phone. Flyers, that included a link to a website with information on the development, and newsletters, had been sent out to 5000 homes and businesses.
- Furthermore, residents and ward councillors had been met with on several occasions.
- All feedback was recorded as part of the Statement of Community Involvement.
- One key topic during consultation was Anti-Social Behaviour (ASB), and it was thought that a contributing factor to ASB in the area was the existing large vacant building with a dead frontage onto Brookes Market, as such, it was anticipated that the proposed development would help to reduce ASB.
- The applicant advised that they were committed to engaging with residents through the Construction Management Plan process once a contractor was appointed.
- The applicant expressed a desire to continuously work with the local community throughout the development process.

The deputy responded to a question from the Committee regarding consultation and reported that they personally had not received any information about the proposed development until September 2023. Upon finding out about the forthcoming application they had informed other local residents about the scheme and encouraged them to share their views with the applicant. However, the deputy felt that their views had not been taken on board and expressed serious concern about some aspects of the application, especially the proposal for a bar on site.

A Committee Member had considered the deputation request submitted by St Mungo's and was highly concerned that due consideration had not been given to how the scheme might impact the vulnerable residents residing at The Lodge at St Ursula's, which was a residential provision for rough sleepers run by St Mungo's. As such, information on the potential impact of those residents was sought.

The Planning Officer reported that no formal equality impact assessment had been undertaken. It was also reported that a light impact assessment had not been undertaken on The Lodge, which was located at the back of the market, because assessment had been undertaken on the residential buildings which were in closer proximity to the development, and it was found that there would be negligible light impact on these buildings. A Committee Member commented that due to the nature of the accommodation at The Lodge, the rooms would likely be single aspect and therefore potential light impacts may be more significant.

Responding to a question about discharging statutory duties in relation to equalities, the Committee's Legal Adviser informed Members that if the Committee were minded to make a decision on the application, consideration had been given to the potential impacts on equalities, fulfilling the legal duty to do so. However, the Committee were entitled to seek further information before coming to a decision.

The Committee then discussed deferring the decision on the application, as they were of the view that there was not enough information relating to the following points:

- The impact of the scheme, particularly the flexible space which could be used as a bar, on the occupants of The Lodge, St Mungo's, especially in relation to equalities.
- The light impact of the proposed development on The Lodge, St Mungo's.
- The consultation process and how residents at this property and neighbouring residents had been engaged with.

Committee Members also requested further information and that an Officer from the Market Team be present to comment on the impact on Leather Lane Market when the application returned to the Committee for further consideration.

ACTION: Director of Economy, Regeneration & Investment

Therefore, on being put to the vote, it was unanimously

RESOLVED –

THAT consideration of the applications, in respect of 2 Waterhouse Square, 140 Holborn, London EC1N 2ST, be deferred to a future meeting of the Committee, pending the receipt of further information, as detailed above.

ACTION BY: Director of Economy, Regeneration & Investment

**7(3) 55 TOTTENHAM COURT ROAD W1T 2EL & 16-24 WHITFIELD STREET
LONDON W1T 2RA**

Consideration was also given to the information provided in the Supplementary Agenda, and the written submissions and deputation requests referred to in Agenda Item 5 above.

The Planning Officer introduced the application and reported that since the publication of the report and supplementary agenda, the pedestrian, cycling and environmental improvements developer contribution had been amended to £50,000.

The Head of Development Management clarified the wording of the planning obligation (para 3.8) which had been included in the section 106 Legal Agreement securing the mural as part of the redevelopment scheme approved in November 2000. The Legal Agreement stated:

"The Owner the Developer APS and LUL covenant with the Council to permit the installation of the Public Art Features in the position indicated on Drawing No. L277/P(O)/109A forming part of the Application and to co-operate with the Council in facilitating the installation of the Public Art Features and thereafter (save with the Council's written consent given in accordance with the requirements of this Agreement such consent not to be unreasonably withheld) to retain and maintain the Public Art Features in that position throughout the duration of the use of the Development."

It was explained that the mural was specifically there to obscure the windows from public view, due to the building formally being a British Transport Police Station.

In response to a question about environmental concerns and energy efficiency, officers advised that the proposed building would retain most of the existing structure, which minimised the environmental impact of the development. Furthermore, the development exceeded the London Plan policy target of a 35% reduction in carbon emissions, achieving an overall reduction of 68.92% and other measures such as green roofs were also proposed.

The Committee sought clarity on the proposed relocation of the mural. Officers explained that the Green Spaces Team would provide an estimate of the costs associated with retaining and maintaining the mural in Crabtree Fields. It had been proposed that a protective film could be applied to the mural, however detail on this was yet to be finalised. The full details of retaining, relocating and maintaining the mural would be worked up in the section 106 legal agreement.

In terms of affordable workspace, Officers confirmed there would be a 50% discount on market rent, available for 15 years. Further details would be finalised in the section 106 legal agreement, the Inclusive Economy Team would be consulted and would assist in finding a suitable occupier.

The Committee were favourable of the application, with one Member commenting that the proposed design was a welcome improvement and seemed more in keeping with the setting than the existing building.

Therefore, on being put to the vote, which was unanimous in favour of the officer recommendation, it was

RESOLVED –

THAT Planning Permission be granted subject to conditions and Section 106 obligations, as set out in the agenda, and the amended pedestrian, cycling and environmental improvements contribution.

**ACTION BY: Director of Economy, Regeneration & Investment
Borough Solicitor**

**7(4) BASEMENT BUILDING C "TRIANGLE BUILDING", STABLES MARKET,
CAMDEN LOCK PLACE, LONDON NW1 8AB**

On being put to the vote, which was unanimous in favour of the officer recommendation, it was

RESOLVED –

THAT Planning Permission be granted subject to conditions, as set out in the agenda.

ACTION BY: Director of Economy, Regeneration & Investment

8. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

There was none.

The meeting ended at 8.45 pm.

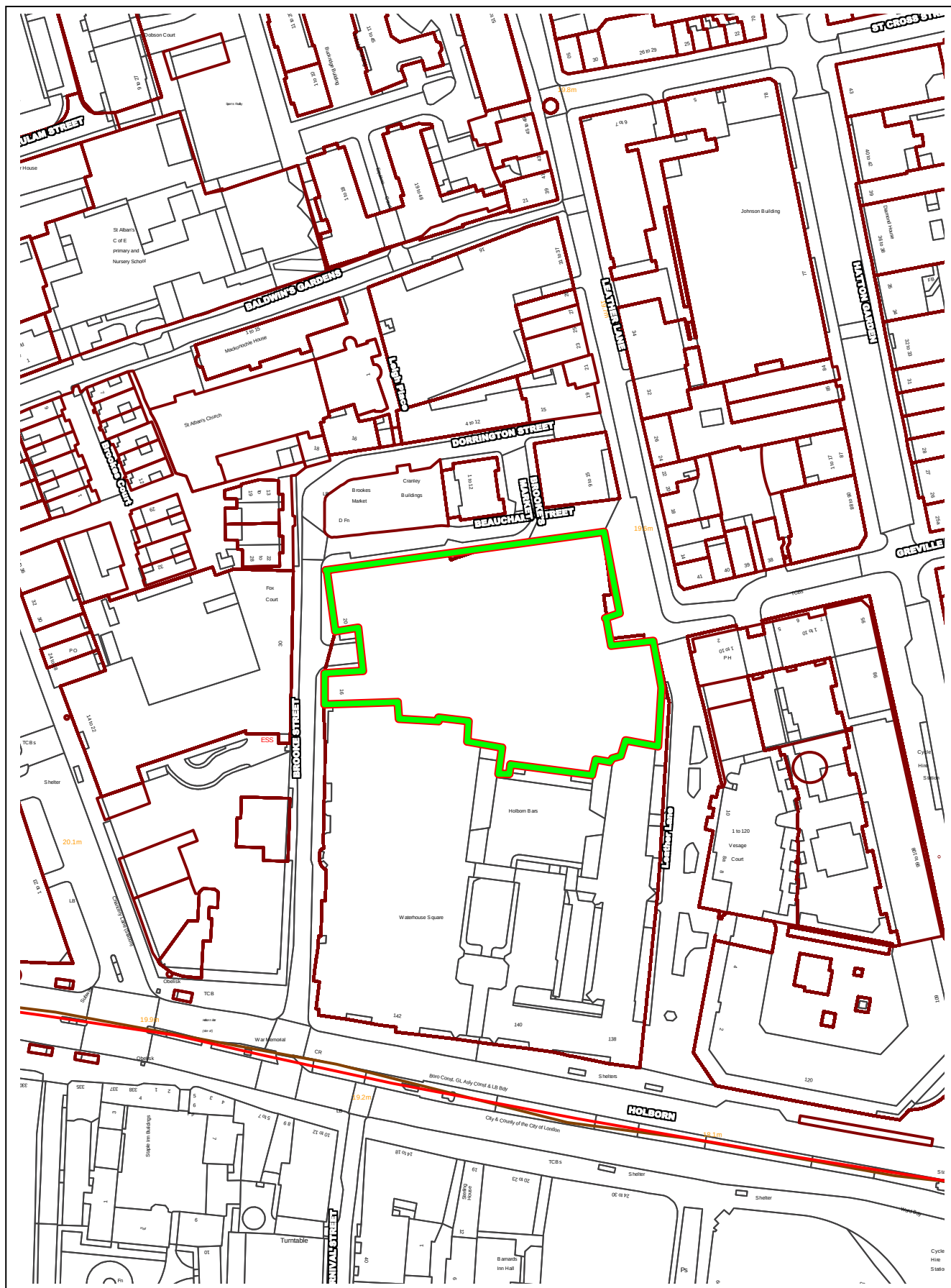
CHAIR

Contact Officer: Rebecca Taylor

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MINUTES END



Application No: 2023/3419/P

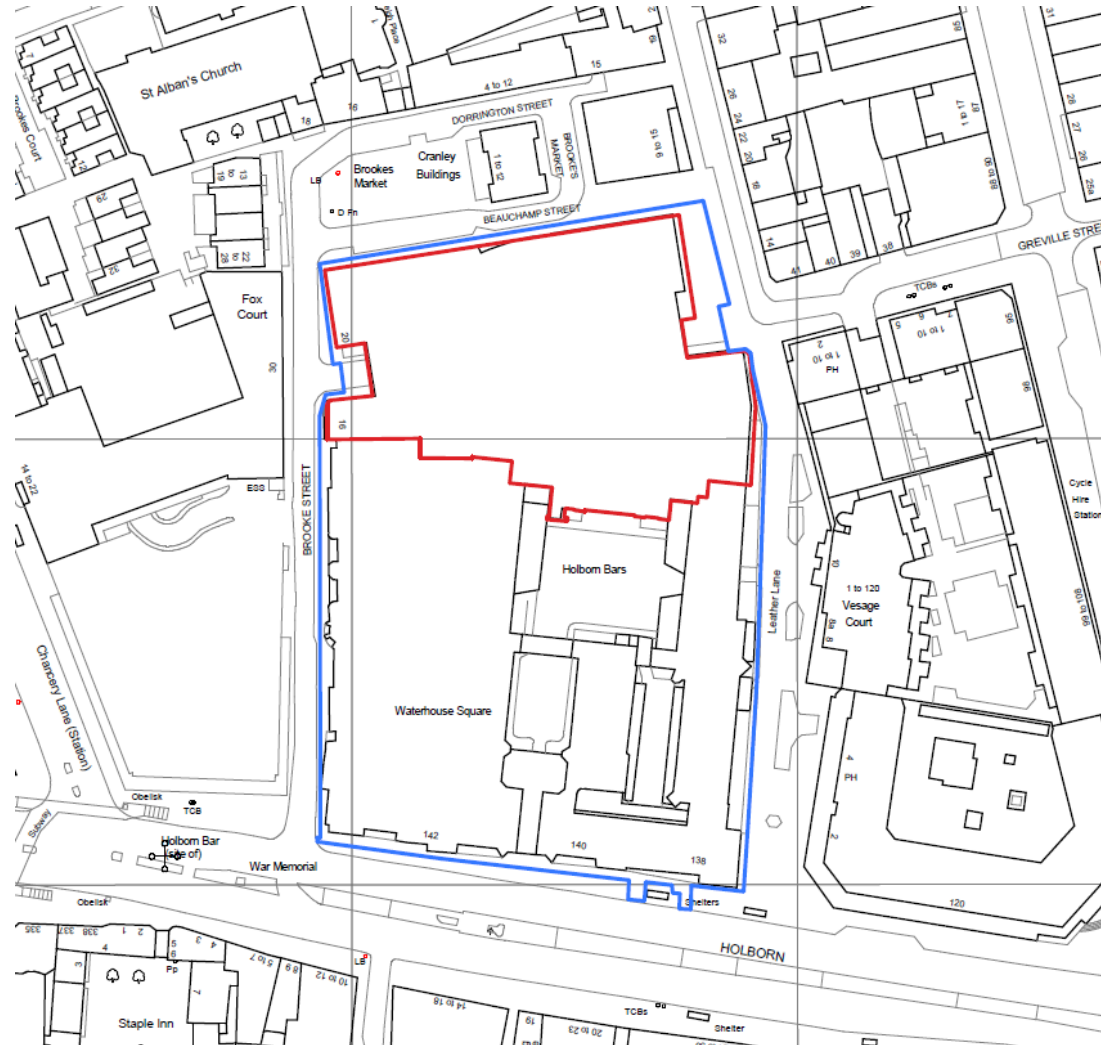
2 Waterhouse Square
140 Holborn, London EC1N 2ST

Scale:
1:1527

Date:
5-Dec-23



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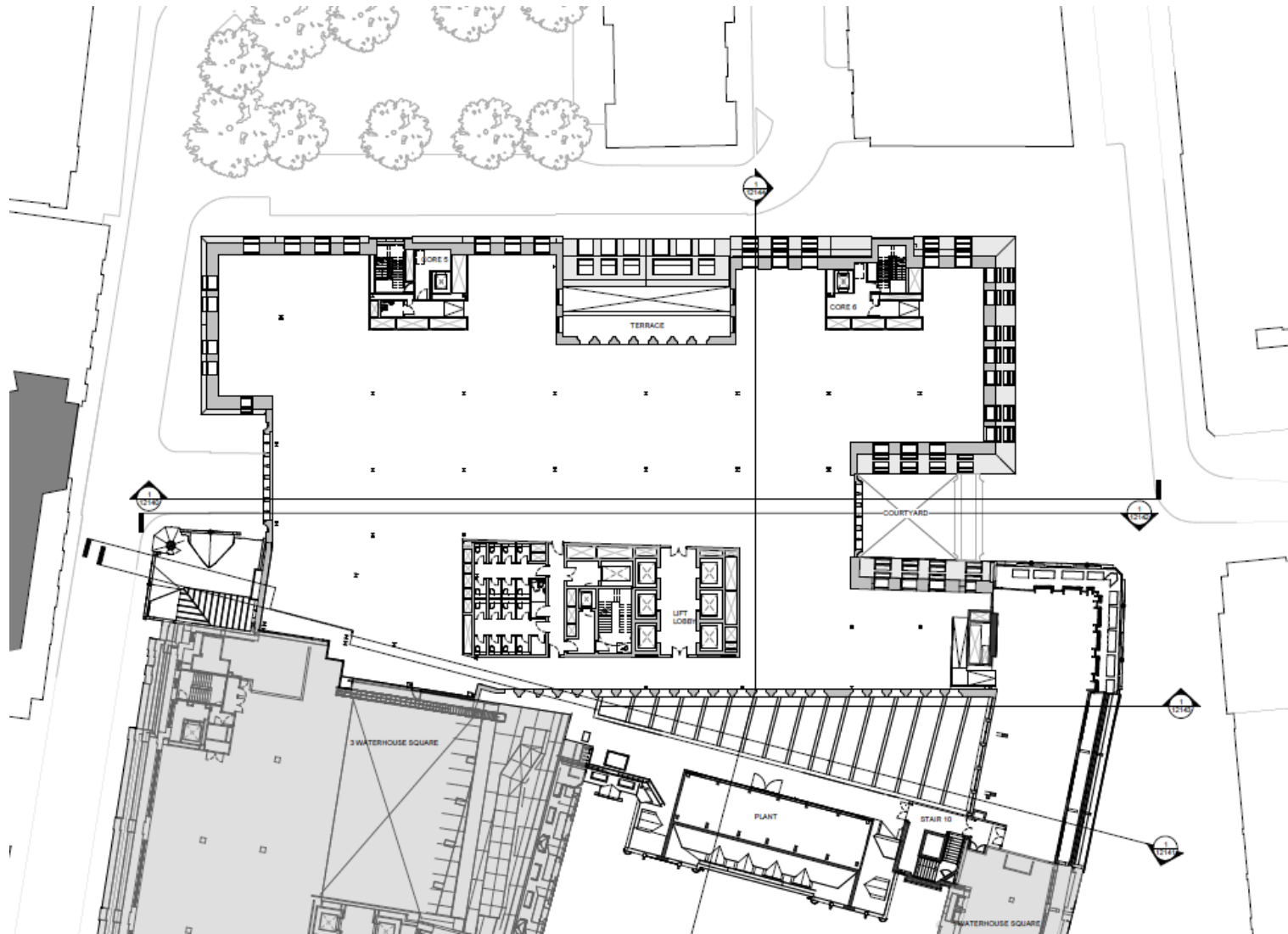


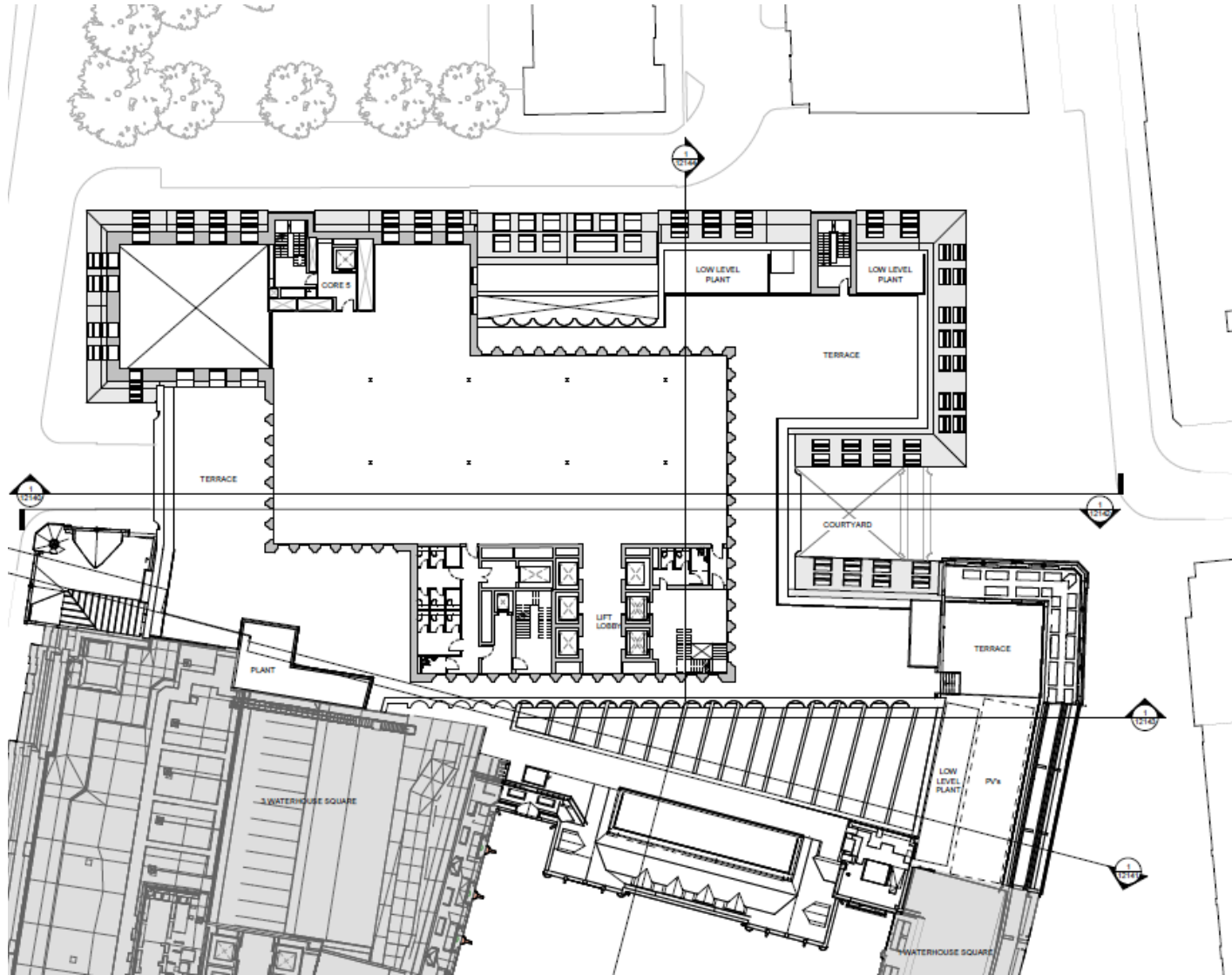












83% of existing structure
volume retained

