

<b>Address:</b>	London Tunnels accessed by Chancery Station House 31-33 High Holborn London WC1V 6AX		<b>1</b>
<b>Application Number(s):</b>	2023/5103/P	<b>Officer:</b> Sam FitzPatrick	
<b>Ward:</b>	Holborn and Covent Garden		
<b>Date Received:</b>	30/11/2023		
<b>Proposal:</b>	Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works.		

**Background Papers, Supporting Documents and Drawing Numbers:**

Existing Drawings:

01820-WEA-XX-ST-PD-A-0001 Rev 00; 01820-WEA-XX-ST-PD-A-0002 Rev 00; 01820-WEA-01-00-PD-A-0100 Rev 00; 01820-WEA-XX-ST-PD-A-0003 Rev 01; 01820-WEA-01-W-PD-A-2050 Rev 00; 01820-WEA-01-N-PD-A-2051 Rev 00; 01820-WEA-01-S-PD-A-2052 Rev 00; 01820-WEA-01-E-PD-A-2053 Rev 00; 01820-WEA-01-W-PD-A-2054 Rev 00; 01820-WEA-01-B1-PD-A-1049 Rev 00; 01820-WEA-01-00-PD-A-1050 Rev 00; 01820-WEA-01-01-PD-A-1051 Rev 00; 01820-WEA-01-02-PD-A-1052 Rev 00; 01820-WEA-01-02-PD-A-1053 Rev 00; 01820-WEA-01-03-PD-A-1054 Rev 01; 01820-WEA-01-03-PD-A-1055 Rev 01; 01820-WEA-01-05-PD-A-1056 Rev 01; 01820-WEA-02-N-PD-A-2150 Rev 00; 01820-WEA-02-S-PD-A-2151 Rev 00; 01820-WEA-02-E-PD-A-2152 Rev 00; 01820-WEA-02-W-PD-A-2153 Rev 00; 01820-WEA-02-B1-PD-A-1149 Rev 00; 01820-WEA-02-00-PD-A-1150 Rev 00; 01820-WEA-02-AA-PD-A-3250 Rev 00; 01820-WEA-03-M1-PD-A-0949 Rev 00; 01820-WEA-03-00-PD-A-0950 Rev 00; 01820-WEA-03-01-PD-A-0951 Rev 00; 01820-WEA-03-02-PD-A-0952 Rev 00; 01820-WEA-03-03-PD-A-0953 Rev 00; 01820-WEA-03-03-ZZ-A-0960 Rev 00; 01820-WEA-03-03-ZZ-A-0961 Rev 00; 01820-WEA-03-03-ZZ-A-0962 Rev 00.

Demolition Drawings:

01820-WEA-01-RF-PD-A-0150 Rev 00; 01820-WEA-01-00-PD-A-0151 Rev 00; 01820-WEA-01-W-PD-A-0152 Rev 01; 01820-WEA-02-00-PD-A-0250 Rev 00; 01820-WEA-02-N-PD-A-0251 Rev 00; 01820-WEA-02-S-PD-A-0252 Rev 00; 01820-WEA-02-W-PD-A-0253 Rev 00; 01820-WEA-03-M1-PD-A-0349 Rev 00; 01820-WEA-03-00-PD-A-0350 Rev 00; 01820-WEA-03-01-PD-A-0351 Rev 00; 01820-WEA-03-02-PD-A-0352 Rev 00; 01820-WEA-03-02-PD-A-0353 Rev 00.

Proposed Drawings:

01820-WEA-01-00-PD-A-0101 Rev 00; 01820-WEA-02-00-PD-A-0200 Rev 00; 01820-WEA-01-W-PD-A-2100 Rev 01; 01820-WEA-01-N-PD-A-2101 Rev 00; 01820-WEA-01-S-PD-A-2102 Rev 01; 01820-WEA-01-E-PD-A-2103 Rev 01; 01820-WEA-01-W-PD-A-2104 Rev 01; 01820-

WEA-01-B3-PD-A-1097 Rev 00; 01820-WEA-01-B2-PD-A-1098 Rev 00; 01820-WEA-01-B1-PD-A-1099 Rev 02; 01820-WEA-01-00-PD-A-1100 Rev 04; 01820-WEA-01-01-PD-A-1101 Rev 00; 01820-WEA-01-02-PD-A-1102 Rev 01; 01820-WEA-01-03-PD-A-1103 Rev 00; 01820-WEA-01-04-PD-A-1104 Rev 00; 01820-WEA-01-05-PD-A-1105 Rev 00; 01820-WEA-01-RF-PD-A-1106 Rev 00; 01820-WEA-02-N-PD-A-2200 Rev 00; 01820-WEA-02-S-PD-A-2201 Rev 00; 01820-WEA-02-E-PD-A-2202 Rev 00; 01820-WEA-02-W-PD-A-2203 Rev 00; 01820-WEA-02-B1-PD-A-1199 Rev 00; 01820-WEA-02-00-DR-A-1200 Rev 00; 01820-WEA-01-ZZ-PD-A-3050 Rev 00; 01820-WEA-01-AA-PD-A-3100 Rev 01; 01820-WEA-01-BB-PD-A-3101 Rev 01; 01820-WEA-01-CC-PD-A-3102 Rev 01; 01820-WEA-01-AA-PD-A-3103 Rev 01; 01820-WEA-01-CC-PD-A-3105 Rev 00; 01820-WEA-01-CC-A-3107 Rev 01; 01820-WEA-02-AA-PD-A-3200 Rev 00; 01820-WEA-02-BB-PD-A-3201 Rev 00; 01820-WEA-02-AA-PD-A-3300 Rev 00; 01820-WEA-01-ZZ-A-4150 Rev 00; 01820-WEA-01-00-A-4151 Rev 02; 01820-WEA-01-ZZ-PD-A-5101 Rev 01; 01820-WEA-01-ZZ-PD-A-5102 Rev 01; 01820-WEA-01-ZZ-PD-A-5103 Rev 01; 01820-WEA-01-ZZ-PD-A-5104 Rev 01; 01820-WEA-01-ZZ-PD-A-5105 Rev 01; 01820-WEA-01-ZZ-PD-A-5106 Rev 00; 01820-WEA-01-ZZ-PD-A-5107 Rev 01; 01820-WEA-01-ZZ-PD-A-5108 Rev 01; 01820-WEA-03-M1-PD-A-0099 Rev 00; 01820-WEA-03-00-PD-A-1000 Rev 00; 01820-WEA-03-01-PD-A-1001 Rev 00; 01820-WEA-03-02-PD-A-1002 Rev 00; 01820-WEA-03-03-PD-A-1003 Rev 00; 01820-WEA-03-ZZ-PD-A-1010 Rev 01; 01820-WEA-03-ZZ-PD-A-1011 Rev 01; 01820-WEA-03-ZZ-PD-A-1012 Rev 01; 01820-WEA-03-ZZ-PD-A-1013 Rev 01.

Documents:

Accessibility Statement (prepared by David Bonnett Associates, dated 30/11/2023); Adaptation to Climate Change Report (prepared by WSP, dated 15/11/2023); Air Quality Assessment (prepared by WSP, dated 30/11/2023); Archaeological Desk-Based Assessment (prepared by Mills Whipp, dated 29/11/2023); Basement Impact Assessment Audit (prepared by Campbell Reith, dated 13/06/2024); BREEAM Pre-Assessment Report (prepared by WSP, dated 30/11/2023); Circular Economy Statement (prepared by WSP, dated 30/11/2023); Construction Traffic Management Plan (prepared by WSP, dated 30/11/2023); Contaminated Land Preliminary Risk Assessment (prepared by WSP, dated 30/11/2023); Cover Letter (prepared by Montagu Evans, dated 30/11/2023); Cultural Plan (prepared by Future City, dated 30/11/2023); Delivery and Servicing Plan (prepared by WSP, dated 16/05/2024); Design and Access Statement (prepared by WilkinsonEyre, dated 30/11/2023); Energy Statement and Overheating Assessment (prepared by WSP, dated 30/11/2023); Equality Impact Assessment (prepared by Montagu Evans, dated 03/05/2024); Fire Statement (prepared by WSP, dated 30/11/2023); Flood Risk Assessment and Outline Drainage Strategy (prepared by WSP, dated 30/11/2023); Flood Risk Evacuation Strategy (prepared by WSP, dated 14/05/2024); Framework Travel Plan (prepared by WSP, dated 16/05/2024); Geotechnical Basement Impact Assessment (prepared by WSP, dated 30/11/2023); Geotechnical Basement Impact Assessment – Fulwood Place (prepared by WSP, dated 15/05/2024); Health Impact Assessment (prepared by Montagu Evans, dated 18/12/2023); Heritage Statement (prepared by Montagu Evans, dated 30/11/2023); Lighting Strategy Report (prepared by WSP, dated 12/04/2024); Noise and Vibration Impact Assessment (prepared by WSP, dated 30/11/2023); Planning Statement (prepared by Montagu Evans, dated 30/11/2023); Pre-Demolition & Retrofit Audit (prepared by WSP, dated 30/11/2023); Security Report (prepared by WSP, dated 30/11/2023); Socio Economic Assessment (prepared by Volterra, dated 30/11/2023); Statement of Community Involvement (prepared by London Communications Agency, dated 30/11/2023); Structural Report (prepared by WSP, dated 30/11/2023); Sunlight & Daylight Assessment (prepared by GIA, dated 30/11/2023); Supplementary Clarification 02 (prepared by WilkinsonEyre, dated 16/05/2024); Supplementary Clarification 04 (prepared by WilkinsonEyre, dated 16/05/2024); Sustainability Assessment (prepared by WSP, dated 30/11/2023); Transport Assessment (prepared by WSP, dated 16/05/2024); Waste Management Plan (prepared by WSP, dated April 2024); Whole Life-Cycle Carbon Assessment (prepared by WSP, dated 30/11/2023).

**RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement**

<b>Applicant:</b>	<b>Agent:</b>
C/O Agent	Peter Bovill Montagu Evans 70 St Mary Axe London EC3A 8BE

**ANALYSIS INFORMATION**

<b>Schedule of Areas</b>			
Site Section	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
38-41 Furnival Street (City of London)	1,423	2,467	+ 1,044
31-33 High Holborn (Camden)	329	329	0
Tunnel Network (Camden and City of London)	7,829	7,829	0
<b>Total</b>	<b>9,581</b>	<b>10,625</b>	<b>+ 1,044</b>

<b>Area Split</b>			
Site Section	Camden GIA (sqm)	City of London GIA (sqm)	Total GIA (sqm)
38-41 Furnival Street	0	2,467	2,467
31-33 High Holborn	329	0	329
Tunnel Network	2,718	5,111	7,829
<b>Total</b>	<b>3,047</b>	<b>7,578</b>	<b>10,625</b>

<b>Land use floorspaces (entire site)</b>				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Class F1	Visitor and cultural attraction (Camden and City of London)	0	10,341	+ 10,341
None (Sui Generis)	Bar (Camden)	0	284	+ 284

None (Sui Generis)	Deep level tunnels (Camden and City of London)	8,352	0	- 8,352
Class E	Offices (City of London)	1,229	0	- 1,229

<b>Parking details (entire site)</b>			
Car Type	Existing spaces	Proposed spaces	Difference
Car – General parking spaces	0	0	0
Car – Accessible parking spaces	1	1	0
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – long stay	0	14	+ 14
Cycle – short stay	7	125	+ 118

## **EXECUTIVE SUMMARY**

- i) The application site consists of two above ground plots located at 31-33 High Holborn and 38-41 Furnival Street, which are linked by deep level tunnels below ground (also known as ‘The Kingsway Tunnels’, not to be confused with the separate ‘Kingsway Tram Tunnel’ to the west of the site). The site crosses the boundary between the London Borough of Camden and the City of London, with the part of the site at Furnival Street falling within the latter. The tunnels themselves run underneath the boundary of the two local authorities, with the north and the west mostly falling within Camden’s control and the south falling within the City of London’s control. The above ground site that sits within Camden’s boundaries is often referred to as the ‘Fulwood Place’ site, given that the side entrance to the building that provides access to the tunnels is on the Fulwood Place passageway that links to High Holborn.
- ii) The Fulwood Place site consists of a building known as Chancery Station House, that was originally used as a public transport access point but is now used for office and retail at lower levels, with residential above. The tunnels below were constructed principally in the 1940s and 1950s, originally for use as a deep-level shelter but subsequently as a document storage facility and later a communication exchange.
- iii) The proposal is for the change of use of the site to a visitor and cultural attraction, including a permanent heritage exhibition and a suite of temporary exhibition spaces. The proposal also includes a bar within the tunnels, and there are proposed works to the two sites above ground to facilitate the change of use. This includes the demolition and redevelopment of the existing buildings at Furnival Street, and the creation of a new visitor entrance at Fulwood Place.



- iv) The part of the proposal falling within the boundary of Camden would be the works to create a new entrance at the Fulwood Place site, and the change of use of the tunnels. As such, the demolition and rebuilding proposed to take place on Furnival Street is not considered as part of this assessment.
- v) The proposed use of the tunnels as a visitor and cultural attraction and the works to Chancery Station House would not result in the loss of existing businesses and would be considered to protect and enhance the role and character of the Holborn Central London Frontage, contributing to its success and vibrancy, as well as that of the wider Central London Area (as defined in the Camden Local Plan) and the Central Activities Zone (as defined in the London Plan and referenced in the Local Plan). The use would also result in a number of employment and economic benefits, including apprenticeships and provisions for local employment and procurement.
- vi) Neither the change or use nor the limited external alterations would negatively impact the character or appearance of the host building or any part of the Bloomsbury Conservation Area. Although the proposed use would necessarily result in an increase in visitors to the site, the impact in terms of noise and disturbance is deemed to be acceptable, and would be managed by an Operational Management Plan. Similarly, transport contributions and obligations have been secured that would alleviate any subsequent impacts on transport infrastructure, including a Travel Plan, a highways contribution, and a Pedestrian, Cycling, and Environmental Improvements contribution, all of which would also deliver wider public benefits.
- vii) The development would be designed so as to minimise carbon use on site, achieving a total carbon reduction of 41.4% below Part L requirements, which meets the policy target of 35%. The development does involve substantial demolition, however not within the borough of Camden, so this part of the scheme does not feature in the assessment. The proposal is currently just under BREEAM Excellent, though it is targeted for this at a later stage; a post-planning pre-assessment has indicated good potential to achieve this, and an obligation has been secured to ensure that this target is reached.
- viii) Subject to the recommended conditions and obligations to be secured by S106 legal agreement, officers are satisfied that the proposal would help deliver a scheme that would support both the Central London Area and Central Activities Zone, as well as provide employment and economic benefits. It is also considered that the proposal would not negatively impact the character or appearance of the Bloomsbury Conservation Area and would not cause unacceptable harm to residential amenity. It would also comply with the Council's policies, including with regards to sustainability and transport matters, and all representations have been considered and taken into account – though there were no objections. Overall, the proposed development complies with the development plan as a whole and is acceptable and in accordance with development plan policies, so it is recommended that conditional planning permission is granted subject to a Section 106 legal agreement.

- ix) It should be noted that the City of London Planning Application Sub-Committee considered an identical application to this, with their assessment being against their policies and based on considerations relevant to the parts of the development located within their boundaries only. The City of London resolved to grant the application on 11<sup>th</sup> June 2024, subject to conditions and a legal agreement.

## OFFICER REPORT

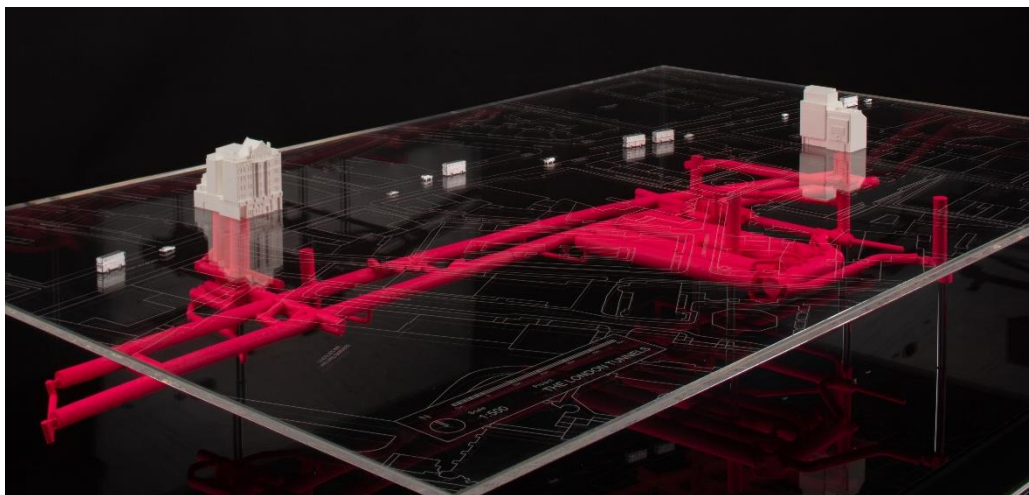
### Reason for Referral to Committee:

Change of use resulting in the provision of more than 1,000 sqm of non-residential floorspace [Clause 3(ii)].

## 1. SITE AND BACKGROUND

### *Location*

- 1.1. The application site covers an area of approximately 1.06 hectares (10,625 sqm) across two above ground sites and a network of deep level tunnels primarily situated directly below High Holborn. The above ground portion of the site that sits within Camden's boundaries is Chancery Station House, 31-33 High Holborn, which is located on the north side of High Holborn, just north of the intersection with Chancery Lane (see Figure 1). Fulwood Place is also located immediately to the rear (north) of the site, and can be accessed through a side passage running alongside the building.



*Figure 1: 3D visual to show tunnel network beneath Fulwood Place site (left) and Furnival Street site (right).*

- 1.2. The tunnels themselves were originally constructed as a deep-level shelter during the Second World War. They have since been used primarily as a telephone exchange managed by British Telecom, who are responsible for their maintenance – though began phased closure from the 1980s, since which they have been vacant.

- 1.3. The tunnels primarily comprise of two longer but smaller in diameter tunnels running from west to east and four shorter but wider in diameter tunnels running from north to south, as shown in figure 2. The two longer tunnels are known as 'streets' and the four perpendicular tunnels are known as 'avenues'. Only the north 'street' and part of the south 'street' lie within Camden's boundaries. The rest of the tunnel system and the above ground part of the site at Furnival Street sit within the boundary of the City of London.

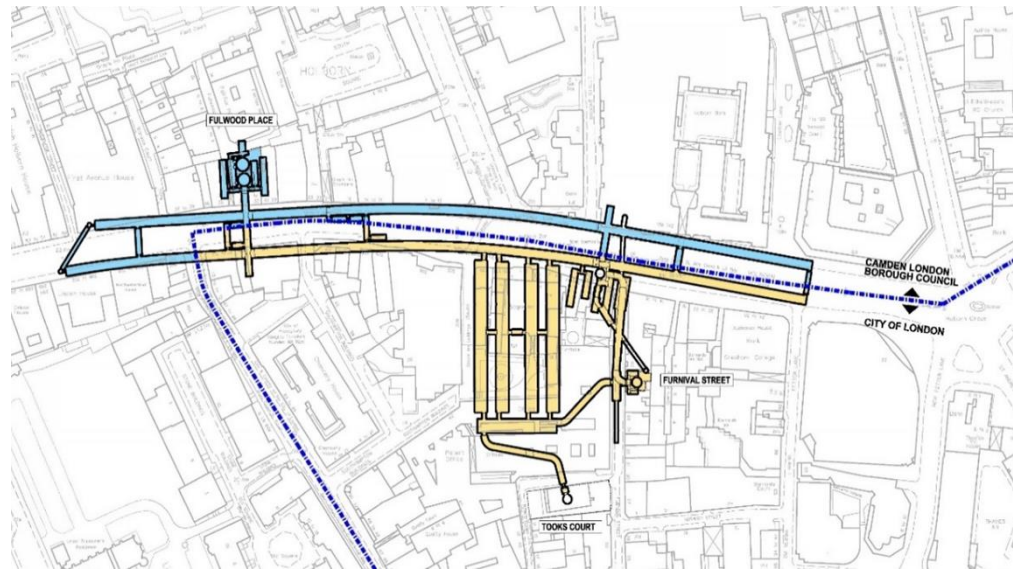


Figure 2: Site plan showing below ground tunnel system.

- 1.4. The existing building at 31-33 High Holborn was initially the main access point to Chancery Lane Station until the 1930s, when the Central London Railway was brought under public ownership and the station moved a short distance to the east. Now the building is primarily used for commercial and residential purposes, with office space at ground level and residential units on the floors above, all of which are accessed from High Holborn (see Figure 2). The office at ground level is also only located at the front of the site, with the rear ground level of the building hosting the lift shaft and reinforced concrete walls. The area of the existing building that contains the lifts to the tunnels is accessible from Fulwood Place via the side alley that connects to High Holborn.
- 1.5. The application site is located within the 'Holborn' Central London Frontage of the Central London Area, as set out in CPG 'Town Centres and Retail', and 31-33 High Holborn is a designated primary frontage within this. The character of the surrounding area is typified by commercial premises at ground floor and a concentration of office development, the entrances of which often break up the continuity of shop premises. There are also a number of residential buildings nearby, including at the intersection of Gray's Inn Road and High Holborn, around

Fulwood place, and around Furnival Street. The buildings around the site are typically between four and seven storeys and vary in age and style.



Figure 3: Existing front elevation of 31-33 High Holborn (Fulwood Place passage shown to left of frontage).

- 1.6. The application site also falls within the Central Activities Zone (CAZ), which is defined in the London Plan as “*the vibrant heart and globally iconic core of London*”, containing various functions of London-wide, national, and international significance, including culture, retailing, and tourism. Policy SD4 of the London Plan looks to support this area by encouraging the growth of a diversity of uses, including cultural and entertainment functions.
- 1.7. The site has a Public Transport Accessibility Level (PTAL) of 6b (excellent), which indicates the best possible rating and that the site is in close proximity to frequent public transport services. The nearest London Underground Station is Chancery Lane, which is located approximately 120 metres to the east of the site. Holborn is also approximately 470m to the west, and Farringdon Station is around a 10-15 minute walk from the site, the latter of which also provides National Rail and Elizabeth Line services. There are also numerous bus routes serving High Holborn, Theobalds Road, Kingsway, and Gray’s Inn Road. 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. The nearest Santander cycle hire docking stations are located on Red Lion Street, Holborn Circus, New Fetter Lane, and Hatton Garden.



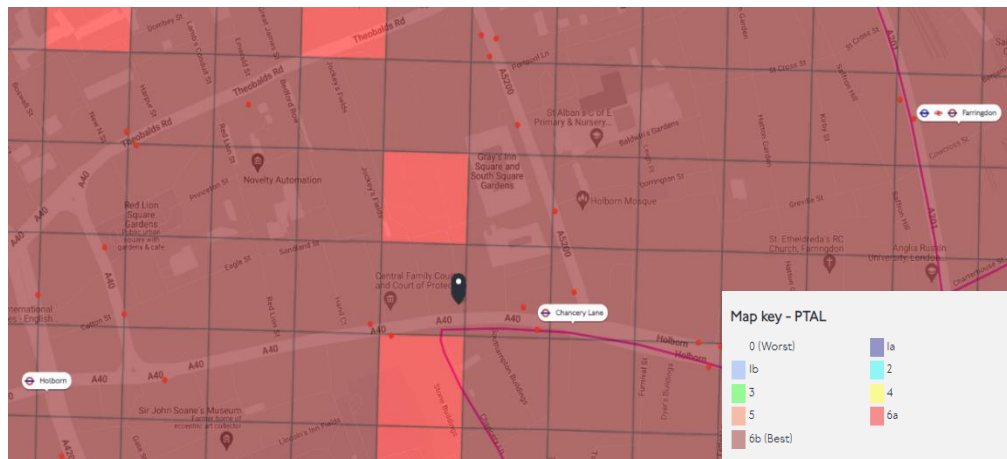


Figure 4: PTAL map of the site (31-33 High Holborn marked with grey pin).

- 1.8. The site is located within the Bloomsbury Conservation Area and 31-33 High Holborn is noted as a positive contributor in the Bloomsbury Conservation Area Statement, however, is not listed. There is little mention of the tunnels in the same statement, which are not listed either. The nearest listed buildings are the Cittie of Yorke pub and gatehouse leading to Gray's Inn and fronting High Holborn.

## 2. THE PROPOSAL

- 2.1. The proposal is for the change of use of the existing deep-level tunnels (Sui Generis) that run below High Holborn to a visitor and cultural attraction (Use Class F1), including a bar (Sui Generis). This would involve the redevelopment of existing buildings at 38-41 Furnival Street, where there is existing access to the tunnel system below, and minor works to the secondary entrance at 31-33 High Holborn (also accessible via Fulwood Place), including to improve the front façade. The Furnival Street access point, located within the City of London, would provide the main entrance to the cultural attraction, including ancillary retail space and office accommodation, and the Fulwood Place access point, located within the London Borough of Camden, would provide a secondary entrance to the cultural attraction and the primary entrance to the bar.
- 2.2. A duplicate application has been submitted to the City of London, as the development site area extends across the borough boundary. Both applications had the same description of development, which reads as follows:

*“Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance*

*(including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works.”*

- 2.3. The attraction would operate with most visitors arriving at the Furnival Street entrance, which sits outside Camden’s boundaries and within the City of London. Although it is not considered as part of this assessment, the proposed works are briefly outlined so that the site can be contextualised in its totality.

***Proposals for the site***

- 2.4. The existing buildings at 38-41 Furnival Street would be demolished and reconstructed, allowing for the excavation and enlargement of the basement and lift shaft to the tunnels. Currently, 38-39 and 40-41 Furnival Street operate and appear as two separate structures, but the new construction would link these internally whilst still visually reading as two independent buildings. The part of the new structure that replaces 38-39 would maintain the existing brick and louvred façade to replicate the building’s historical character, whilst the part replacing 40-41 would be commercial in appearance with translucent glass bricks (see figure 4). This would serve as the main entrance point where visitors would arrive for their visit. Upon arrival, they would pass through security checks and have the opportunity to store personal belongings in lockers. From there, they would then be able to access the tunnels.



*Figure 5: CGI of proposed main entrance on Furnival Street in City of London*

- 2.5. The tunnels themselves would be split into three main parts. The first of these would be what is referred to as the ‘streets’, which is made up of the two longest tunnels that run horizontally. The second section is the ‘avenues’, which are the vertical shorter tunnels running perpendicular to

the south of the 'streets'. The third section is the bar, which is located in the most western point of the 'streets', in the south tunnel.

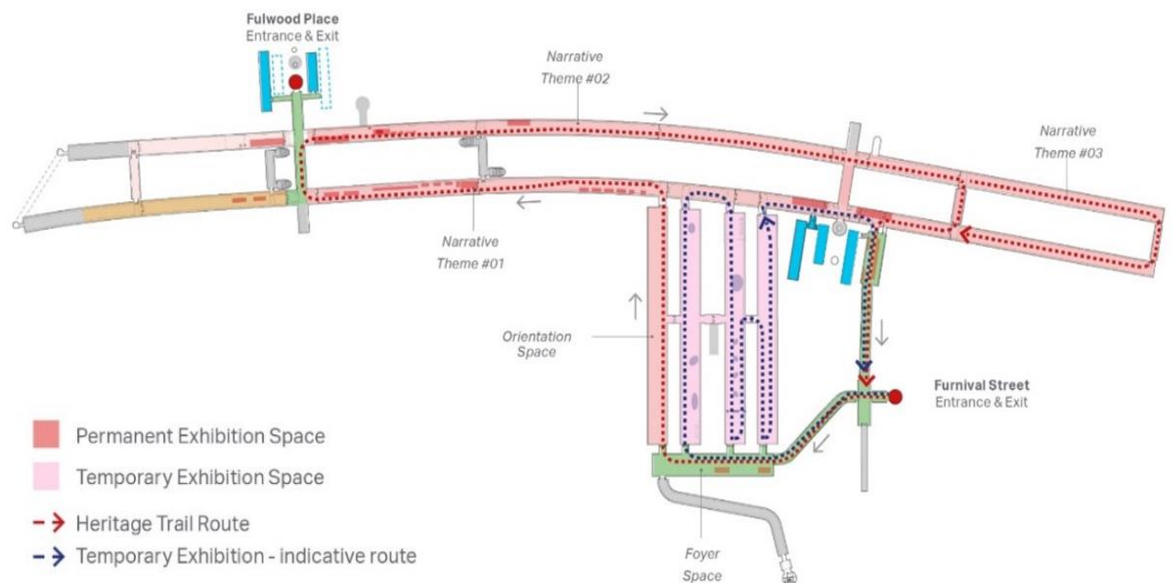


Figure 6: Map of tunnels showing routes through exhibitions.

- 2.6. Upon arrival at the site, visitors would be able to visit the permanent exhibition or the temporary exhibition, depending on which ticket they purchase. These two exhibitions would make up the main visitor attraction, and would be open to visitors from 10:00-20:00 (secured by condition 5). Based on their ticket, they would then follow a set route that takes them through either the 'streets' or the 'avenues', as shown in figure 5 above. The average duration of a visit is expected to be around one hour and twenty minutes. These types of visits would be commenced through the Furnival Street entrance/exit, whereas school visits would enter via the Fulwood Place entrance/exit and take a different route through the exhibitions.
- 2.7. The attraction is designed to accommodate a peak occupancy of 750 visitors at any given time, though this would only be expected on approximately 20 of the busiest days of the year. Typical occupancy is instead predicted to be around 560 visitors per hour, and it should be noted that the bar would operate independently with a capacity of 160 people. It is estimated that the attraction would bring up to two million visitors per year.
- 2.8. The 'streets' would host the heritage exhibition that would be a permanent feature of the attraction, and is intended to focus on the history of the tunnels. This would include exhibitions on their use during the Second World War throughout the Blitz, their hosting of the wartime Special Operations Executive from 1940, and their operation as a telecommunications exchange during the Cold War. These three



narratives would form three separate sections of the journey through the tunnels, and immersive augmented reality and digital interactives would be used throughout.

- 2.9. The 'avenues' would function as temporary exhibition spaces that could be adapted for various different cultural events. These would be unique and adaptable spaces that could provide multi-sensory experiences and be used for a multitude of different events, facilitated by the use of digital screens, projectors, and scent-emitting technology. The intention would be for this space to be able to host a wide range of appropriate uses, including arts and culture exhibitions, fantasy environments, fashion shows, music events, dinner, and corporate hire events.
- 2.10. The bar would sit within the 'streets' at the western point of the south tunnel, which is the site of the historic bar and recreation rooms that previously existed at the site. This would serve as a stopping point for the permanent heritage exhibition route, but would also be available to visit after hours. The bar would be open from 10:00 until 01:00 at the latest, though it may not regularly operate to these hours (these are secured by condition 6). After the closure of the main visitor attraction at 20:00, visitors to the bar would gain access through the Fulwood Place site only, and they would only be able to visit the bar, with no access to the exhibition spaces in the rest of the tunnels. There is also a small space in the western point of the north tunnels that would be used for hosting school groups and providing an area for orientation.

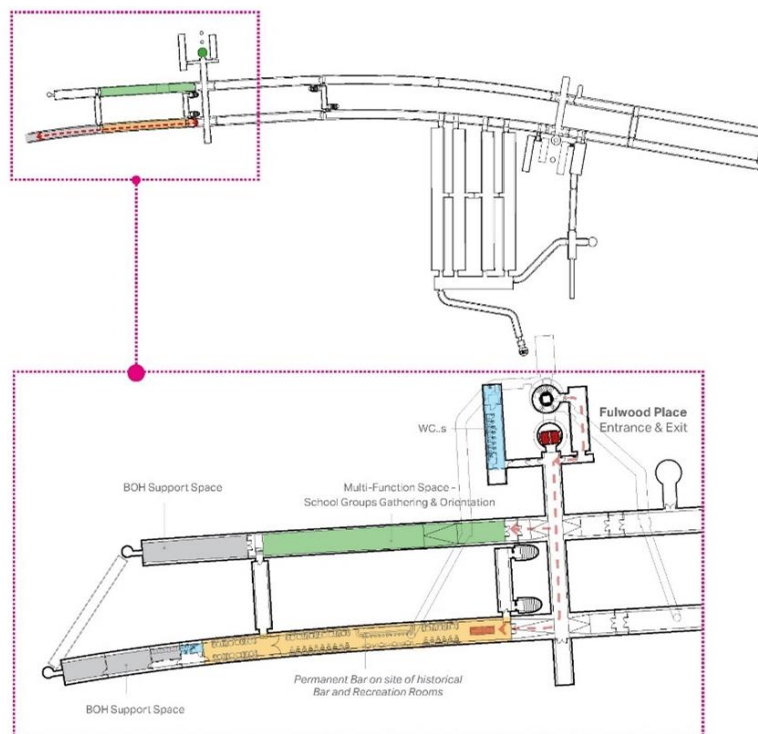


Figure 7: Map showing the location of the bar within the tunnel system.

- 2.11. The entrance to the attraction at Fulwood Place would be located at the side of the building, where there are already service doors leading to the lift shaft. This would be where school groups and visitors to the bar would arrive and exit the tunnels. For the purposes of improving the appearance of the host building, the façade facing High Holborn would undergo alterations to the existing frontage, but this would not serve as an entrance to the site or the tunnels. The passageway leading to Fulwood Place would remain the only access point to the tunnels. There is currently no signage proposed, and any future signage would require advertisement consent.



Figure 8: Existing (top) and proposed (bottom) façade of 31-33 High Holborn.

- 2.12. There would be some other minor alterations to the rest of the Fulwood Place part of the site, including installation of ventilation louvres to the side elevation and external lighting to the passageway to serve as wayfinding to the tunnels entrance.



Figure 9: Proposed north (top) and west (middle) elevations and indicative lighting strategy to the passageway (bottom).

### **Assessment of the application**

- 2.13. The National Planning Practice Guidance on making applications states that, “where a site which is the subject of a planning application straddles one or more local planning authority boundaries, the applicant must submit identical applications to each local planning authority”. In line with this guidance, applications were submitted to the respective local authorities, and the two applications were each publicised separately.

- 2.14. The planning applications are each to be determined by the respective local planning authorities in accordance with the considerations of the local authority's development plan, as well as any other material considerations, as set out by Section 70 of the Town and Country Planning Act 1990. Each planning application is assessed independently by each local planning authority, with each being entitled to reach its own decision on the application submitted to them in the usual way.
- 2.15. The Council has previously dealt with similar cross-borough applications of this kind. Applications extending across the boundaries of multiple local authorities have previously been assessed separately alongside a parallel application submitted to the neighbouring borough, including at the Mount Pleasant site (ref. 2013/3807/P) located between the boroughs of Camden and Islington, and the Kings Cross Triangle Site (ref. 2008/0057/P), also located between the boroughs of Camden and Islington.
- 2.16. In considering this application, Officers have reviewed the parts of the scheme that fall within the boundaries of the London Borough of Camden, and have assessed these against the local planning authority's development plan. However, whilst elements of the scheme that fall only within the boundaries of the City of London (such as the demolition and rebuild at Furnival Street) are not assessed against Camden's development plan, it should be noted that officers have considered the application as a whole. This is with the understanding that officers from the City of London will review the elements falling within their boundaries against their development plan, as Camden officers have considered elements falling within Camden's boundaries against its own development plan. The relevant policies are noted in section 6 of this report.
- 2.17. It should also be noted that officers have been in regular and continuous liaison with City of London officers throughout the application process, having shared the material planning considerations of the development and the assessment taken by each local planning authority so as to ensure that any concerns or objections have been adequately addressed to the satisfaction of both authorities. It should also be noted that on 11<sup>th</sup> June 2024, the City of London Planning Applications Sub-Committee resolved to grant the application submitted to their local authority, subject to a Section 106 legal agreement. Final determination will await the completion of an associated legal agreement, but the resolution to grant is a material consideration in the determination of this application.
- 2.18. If both authorities grant planning permission, each authority will grant permission in so far as it relates to land in their respective administrative area.



### 3. ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

- 3.1. A screening opinion for the proposal was provided by the Council on the 13<sup>th</sup> June 2024, which confirmed that, whilst the proposal is by definition a Schedule 2 development, it is expected that the characteristics, type, location, and expected impact of the development would not be significant enough to warrant an Environmental Impact Assessment.

### 4. RELEVANT HISTORY

- 4.1. The following sets out the most relevant planning history for the site and the surrounding area, and is only relevant to the planning history of the parts located within the London Borough of Camden.

#### *The application site*

- 4.2. **2024/1587/P** – Request for screening opinion under Regulation 6 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017 for the change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works. **EIA not required 13/06/2024.**
- 4.3. **2022/0918/A** – Display of non-illuminated projecting sign at entry to Fulwood Place. **Advertisement consent granted 14/10/2022.**
- 4.4. **2021/1896/P** – Proposed conversion of 2<sup>nd</sup> floor of building at 31-33 High Holborn from offices (Class E) to form five self-contained flats (Class C3). **Permission refused 31/01/2022 and dismissed at appeal 01/04/2022.**

#### Reasons for refusal:

- 1) The submitted drawings do not accurately represent the current building on site in the existing or proposed drawings, and therefore the drawings could not be implemented without other significant works of demolition and repair which have not formed part of the application.
- 2) The proposed development, in the absence of sufficient justification demonstrating that the premises is no longer suitable for continued business use would fail to support economic activity in Camden and result in the loss of employment opportunities within the Borough.

- 3) The proposed development, in the absence of sufficient information demonstrating the noise impact and noise mitigation from the proposed plant, there is likely to be harm to the amenity of neighbouring occupiers.
- 4) The proposed residential accommodation would not prioritise the Council's dwelling size priority for market homes (2 and 3 bed properties), with large homes (3 bed or larger).
- 5) The proposed residential flats, in the absence of adequate outlook, would result in overlooking and substandard accommodation.
- 6) The proposed development, in the absence of a legal agreement for car-free housing, would be likely to contribute unacceptably to parking stress and congestion in the surrounding area.
- 7) The proposed development, in the absence of a legal agreement securing a contribution to affordable housing, would fail to meet the needs of households unable to access market housing.

4.5. **2010/3671/P** – Retention of refurbished front elevation at ground/mezzanine level of 31-33 High Holborn, including repair/restoration of archways, new windows in archways at mezzanine level, alterations to ground floor access points and associated alterations. **Permission granted 16/09/2010.**

4.6. **2010/0460/P** – Revisions to planning permission 2008/2588/P, dated 25/03/2009, for change of use of upper floors of 31-33 High Holborn from retail/office uses (Class A1 and B1) to residential use (Class C3) to provide 9 units, including extension and refurbishment of the upper floors, retention of ground and mezzanine floors as retail (Class A1), alterations to ground floor entrance, refuse storage and existing spiral stair/escape provision. Revisions comprise erection of mansard roof extension at fifth floor level (on west side of High Holborn front elevation) to provide additional residential accommodation for approved Flat 8. **Permission granted subject to a Section 106 legal agreement 18/03/2010.**

4.7. **2010/0445/P** – Revisions to planning permission 2008/2588/P, dated 25/03/2009, for change of use of upper floors of 31-33 High Holborn from retail/office uses (Class A1 and B1) to residential use (Class C3) to provide 9 units, including extension and refurbishment of the upper floors, retention of ground and mezzanine floors as retail (Class A1), alterations to ground floor entrance, refuse storage and existing spiral stair/escape provision. Revisions comprise an enlarged mansard roof extension at fifth floor level (on east side of High Holborn front elevation) and associated alterations for approved Flat 8 (compared with that granted by planning permission 2009/4519/P, dated 10/12/2009). **Permission granted subject to a Section 106 legal agreement 18/03/2010.**

- 4.8. **2009/4519/P** – Revisions to planning permission 2008/2588/P, dated 25/03/2009, for change of use of upper floors of 31-33 High Holborn from retail/office uses (Class A1 and B1) to residential use (Class C3) to provide 9 units, including extension and refurbishment of the upper floors, retention of ground and mezzanine floors as retail (Class A1), alterations to ground floor entrance, refuse storage and existing spiral stair/escape provision. Revisions comprise extension at fourth floor level and mansard roof extension above at fifth floor level and alterations at ground floor level, including a new staircase, lift and an enlarged cycle store. **Permission granted subject to a Section 106 legal agreement 10/12/2009.**
- 4.9. **2008/2588/P** – Change of use of upper floors of 31-33 High Holborn from retail/office uses (Class A1 and B1) to residential use (Class C3) to provide 9 units, including extension and refurbishment of the upper floors, retention of ground and mezzanine floors as retail (Class A1), alterations to ground floor entrance, refuse storage and existing spiral stair/escape provision. **Permission granted subject to a Section 106 legal agreement 25/03/2009.**
- 4.10. **8602270** – Provision of a new spiral staircase from 4<sup>th</sup> floor to first floor level of 31-33 High Holborn to provide alternative means of escape in case of fire including altering an existing window to form a door for access to the second internal spiral staircase. **Permission granted 18/02/1987.**
- 4.11. **8700585** – Erection of a suspended walkway next to the first floor wall of 31-33 High Holborn at the side of the premises to reach a new staircase leading down to ground level in Fulwood Place. **Permission granted 06/08/1987.**
- 4.12. **8703532** – Erection of an enclosed spiral fire escape stairway to 31-33 High Holborn, extending down from a previously approved 1st floor level parapet to ground level in Fulwood Place as an alternative to the straight flight of stairs previously approved. **Permission granted 17/12/1987.**
- 4.13. **N15/25/B/1966** – The foundation of a new facade on the front elevation at ground floor level at 31-33, High Holborn, Camden. **Permission granted 23/06/1966.**

## 5. CONSULTATION

### ***Statutory consultees***

#### Historic England – Greater London Archaeological Advisory Service (GLAAS)

5.1. No objection given and in principle support for the re-use of the tunnels for proposed use, however recommended that The Kingsway Tunnels themselves should be considered a non-designated heritage asset because of their historical interest. As such, the following is noted/suggested:

- It is recommended that historic building recording is carried out in advance of redevelopment, to be secured by condition. This would ensure that the applicants record the significance of the heritage asset that the development could cause harm to.
- The planning application lies within an area of archaeological interest, as Holborn was the site of a number of noteworthy events and locations across different periods of history. A precautionary condition is suggested to secure investigation to avoid harm to any archaeological remains, though it is noted that this would not be required if groundworks are negligible.

*Officer response: Officers agree with the recommended condition to secure historic building recording, which has been added to the recommendation (condition 34); however, it is not considered that the groundworks proposed within the boundaries of the London Borough of Camden are significant enough to warrant the archaeological investigation condition. As noted in Historic England's response, this would not be required if the works were negligible; as demonstrated in section 16 of this report, the groundworks are not considered significant, so this condition is not sought. Please see section 9 for more detail regarding heritage and conservation.*

#### Transport for London (Infrastructure Protection)

5.2. No objection in principle to the proposed development – however, due to potential constraints on the redevelopment of a site close to London Underground railway infrastructure, suggested a condition to ensure that the development does not impact on the aforementioned infrastructure.

*Officer response: Officers note the request for the condition and have included it as part of this recommendation (condition 33).*

#### Transport for London (Spatial Planning)

5.3. No response was received from Transport for London's Spatial Planning team, however the City of London did receive a response to the request



for consultation that they submitted as part of their identical application. This response reviewed the proposal in its entirety, so it is considered that the same concerns raised by this response apply directly to the assessment of this application also. The response received by City of London can be summarised as follows:

- Pedestrian comfort levels are considered to be acceptable.
- Wayfinding measures in the station and on the street would help offset impact on public transport and improve pedestrian experience.
- Further work is needed to improve long-stay cycle parking, including with regards to design and access.
- The blue-badge bay is considered to be acceptable, subject to the location and operation being considered acceptable by both planning authorities.
- More clarity is required on whether taxis or private hire vehicles would be restricted from accessing Furnival Street, and a more robust coach management plan is requested to ensure that safety and operation of nearby highways is not impacted.
- The operation of Delivery and Servicing would need to be ensured to be able to be appropriately managed, and the final Delivery and Servicing Plan should be secured.
- Further detail is required on construction logistics related to the demolition and construction works at Furnival Street.
- The submitted Travel Plan is supported but additional measures including wayfinding and incorporation of Santander cycle hire would be encouraged.
- An Operational Management Plan is suggested to provide sufficient mechanisms and proposals that could be adapted once the venue is operational.
- Request that the City of London and the London Borough of Camden work with dockless bike providers to provide a no parking zone surrounding the access locations – due to the constraint nature of the access points and potential implications of the bikes being in inconvenient locations.

*Officer response: The concerns raised in the above points have been fully considered and are reviewed in the 'Transport' section of this report (section 12). It should also be noted that concerns relating solely to Furnival Street and the areas of the site within the boundary of the City of London have been considered with regard to the City of London's development plan as part of their recommendation to approve the planning application. Planning obligations and conditions have been suggested relating to transport that are outlined in the relevant section.*

#### Metropolitan Police (Design Out Crime)

5.4. No objection in principle but made a number of comments and recommendations – all specific to the High Holborn part of the development and are summarised below:

- Important that the site is protected against illegitimate entry/intrusion, including through emergency doors, alarm systems, etc.
- Clarity is sought on the entrance operation, specifically with relation to the passage that leads to Fulwood Place due to the tendency of areas such as this potentially attracting crime and antisocial behaviour.
- Suggestions made that the venue should issue identification measures to aid security and ticketing.
- The doors and windows of the venue are recommended to be reinforced with security rated and certified alterations, including to the front façade.
- Short stay parking should have excellent natural surveillance and would be preferred to be London stands rather than Sheffield stands.
- CCTV and lighting strategies that focus on increasing surveillance and improving wayfinding are recommended.
- Further clarification is needed regarding the issue of coach parking and school transport.

*Officer response: See section 11 of this report for details relating to safety and security. Due to the nature of the works and limited external alterations proposed, it is not considered reasonable to impose restrictions or requesting additions that fall outside the scope of the proposal or planning considerations, such as means of identifying visitors or requiring window/door replacement. However, the Security Report includes measures that would be considered to cover these concerns, and an informative has been added to advise the applicant to involve the DOCO throughout later stages of the design process.*

#### Counter-Terrorism Security Advisor (CTSA)

5.5. Whilst there was not a formal consultation made to the CTSA for this application, the CTSA did respond to the City of London's identical application. As part of their response, CTSA visited the site and read through the submitted Security Report. Separate advice was provided to the applicant that would not require planning conditions, however the applicant is advised to consult CTSA throughout as plans evolve; an informative has been added to this effect. Details of security measures for the site are confidential and as such are not available in the public domain.

### London Fire Brigade

5.6. The London Fire Brigade (LFB) raised no objection to the application, but did outline some general comments to be considered as the application progresses. These can be summarised as follows:

- The proposal states that the methodology outlined in BS 7974:2019 would be followed which is supported, though LFB advises that a Qualitative Design Review process should be undertaken, the process of which LFB would expect to be involved in as a key stakeholder – both in their capacity as an emergency response agency for fires and other emergencies, but also as the future enforcing authority. No specific methodology would necessarily lead to an acceptable outcome, and the detail of any risks identified and/or decisions made may require revision throughout the design and construction phases. There should also be an assessment of system failures or foreseeable events which may negatively impact on the fire safety of the proposal.
- Caution should be taken when applying recommendations of BS 9992 to tunnels that do not form part of railway infrastructure, as although some recommendations of the code of practice may be applicable, the assumptions made for sub-surface railway infrastructure are quite different than for other types of purpose group/occupancy. It is expected that suitable smoke ventilation/control systems would be provided in conjunction with suitable and compatible automatic fire suppression systems would be provided – subject to the outcome of the performance-based design process and stakeholder engagement.

5.7. Additionally, the LFB outlined a number of specific fire safety design issues that would be expected to be addressed as the fire safety design develops. These include:

- Extended travel distances for occupant means of escape and firefighter access/intervention due to the nature of the tunnel infrastructure. This would need to be addressed by undertaking evacuation analysis using fire and evacuation modelling, and would involve consideration of both horizontal and vertical firefighting intervention.
- Inclusive design and means of escape for persons with relevant protected characteristics. Special consideration must be given to persons of restricted mobility, specifically with regards to the use of the lifts.
- Radio communications coverage for firefighters and other emergency responders.
- Use of electric powered personal vehicles and the risk they bring from failure of lithium-ion powered electric vehicles.

- Construction phase fire safety and assurance that suitable means of escape is provided for construction operatives.

*Officer response: The concerns raised by LFB have been considered and are covered in the 'Safety and security' section of this report (section 11). As noted by LFB, a number of the above concerns are not necessarily planning considerations, and where necessary, other regimes will secure assurances that ensure fire safety is properly considered. Notwithstanding this, conditions have been included in this recommendation where necessary and relevant (conditions 10 and 11).*

#### City of Westminster

- 5.8. Due to the nature of the proposed works and the distance to the borough boundary with the City of Westminster, no request for observations was made to the City of Westminster by the London Borough of Camden. However, City of London did request consultation from the City of Westminster, for which no objection was received.

#### City of London

- 5.9. Although the City of London would ordinarily have been consulted, the nature of the duplicate planning applications submitted to both boroughs involved in the proposed development means that no request for observations was necessary. Nonetheless, the City of London's resolution to grant permission forms a material consideration in this report's assessment of the proposal.

#### **Local groups**

##### Bloomsbury CAAC

- 5.10. No response was received from the Bloomsbury Conservation Area Advisory Committee.

##### **Adjoining occupiers**

- 5.11. Site notices were displayed in the vicinity of the site within Camden's boundaries – these included to Fulwood Place and at multiple points on High Holborn – both outside Chancery Station House and in close proximity to Fournival Street. These site notices were displayed from the 24<sup>th</sup> January 2024 and expired on the 17<sup>th</sup> February 2024. A press advert was also published in the Camden New Journal on the 25<sup>th</sup> January 2024, expiring on the 18<sup>th</sup> February 2024, and a digital site notice was published on Camden's website.
- 5.12. Prior to making this recommendation, no objections have been received, and 14 letters of support were received. The subjects raised in letters of support were as follows:

- The proposal would restore the tunnels and the historic role they played in the country's history.
- The economic benefits from a new tourist attraction would be welcomed, especially due to the impact that covid has had on the Holborn area.
- The tunnels would be a popular tourist attraction that would attract visitors to London.
- The location of the proposed attraction would mean it is accessible by public transport and there would be limited impact on surrounding highways.

5.13. One letter was received that did not object to the proposal, but requested clarification regarding logistical concerns, such as whether the proposal was feasible and, if so, when it was likely to be implemented. Whilst not technically a comment on the proposal, officers explained that the Council would only look to recommend schemes for approval if implementable, and that this report would cover all relevant planning considerations.

## 6. POLICY

### ***National and regional policy and guidance***

[National Planning Policy Framework 2023 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

[London Plan 2021 \(LP\)](#)

[London Plan Guidance](#)

### ***Local policy and guidance***

[Camden Local Plan \(2017\) \(CLP\)](#)

[Policy G1 Delivery and location of growth](#)

[Policy C1 Health and wellbeing](#)

[Policy C3 Cultural and leisure facilities](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E2 Employment premises and sites](#)

[Policy E3 Tourism](#)

[Policy A1 Managing the impact of development](#)

[Policy A4 Noise and vibration](#)

[Policy A5 Basements](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[Policy D3 Shopfronts](#)

[Policy D4 Advertisements](#)

[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 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](#)  
[Basements - January 2021](#)  
[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](#)  
[Public open space - January 2021](#)  
[Town centres and retail - January 2021](#)  
[Transport - January 2021](#)  
[Water and flooding CPG - March 2019](#)

*Other guidance:*

[Bloomsbury Conservation Area Appraisal and Management Strategy \(2011\)](#)

### Draft Camden Local Plan

The council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for consultation (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications, but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

### Draft Holborn Supplementary Planning Document (2024)

The Council has published the 'Holborn Vision', a [Draft Holborn Supplementary Planning Document](#) for consultation, which is a material consideration and can be taken into account in the determination of planning applications, but has limited weight at this stage.

## **7. ASSESSMENT**

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

<b>8</b>	<b>Land use</b>
<b>9</b>	<b>Design and heritage</b>
<b>10</b>	<b>Amenity</b>
<b>11</b>	<b>Safety and security</b>
<b>12</b>	<b>Transport</b>
<b>13</b>	<b>Sustainability and energy</b>
<b>14</b>	<b>Air quality</b>
<b>15</b>	<b>Flood risk and drainage</b>
<b>16</b>	<b>Basement considerations</b>
<b>17</b>	<b>Contaminated land</b>
<b>18</b>	<b>Economy and employment</b>
<b>19</b>	<b>Community Infrastructure Levy (CIL)</b>
<b>20</b>	<b>Conclusion</b>
<b>21</b>	<b>Recommendation</b>
<b>22</b>	<b>Legal comments</b>
<b>23</b>	<b>Conditions</b>
<b>24</b>	<b>Informatives</b>

## **8. LAND USE**

- 8.1. The application site is part of the Central London Area as defined by CPG 'Town centres and retail', and more specifically is part of the Holborn Central London Frontage, within which 31-33 High Holborn is noted as being a primary frontage. The Holborn Central London Frontage largely operates as a town centre for workers and the nearby residential community, and is characterised by retail use and financial and professional services, though food, drink, and entertainment uses are also present, albeit interspersed throughout the area.
- 8.2. The designation as a Central London Frontage means that Holborn has an international, national, or London wide role in the services it provides. Additionally, its central location means that there is good public transport provisions and busy, commercial streets with limited residential development. As such, this makes the area an appropriate location of new entertainment uses, provided that this is balanced against the need to protect retail functions and protect the amenity of any nearby residents.

- 8.3. Policy TC2 (Camden's centres and other shopping areas) of the Local Plan seeks to promote and ensure successful and vibrant centres throughout the borough to serve the needs of residents, workers, and visitors. The policy aims to protect and enhance the role and unique character of each of Camden's centres by providing for a range of shops including "*food, drink, and entertainment and other suitable uses to provide variety, vibrancy, and choice*".
- 8.4. Policy TC4 (Town centre uses) of the Local Plan seeks to ensure that the development of shopping, services, food, drink, entertainment, and other town centre uses does not cause harm to the character, function, vitality, and viability of a centre, the local area, or the amenity of neighbours. To this end, the Council will consider the effect of development on shopping provision and the character of the centre in which it is located, as well as the cumulative impact of food, drink, and entertainment uses, taking into account the number and distribution of existing uses.
- 8.5. Policy C3 (Cultural and leisure facilities) of the Local Plan states that cultural facilities will be supported in the borough, including where opportunities for new such facilities arise. The supporting text to the policy states that facilities such as national and internationally important museums and the mix of galleries and venues supporting the arts contribute to townscape value and the special character of conservation areas, as well as contribute to Camden's tourism and businesses investment, and the general vibrancy and success of town centres.
- 8.6. Policy SD4 (The Central Activities Zone) of the London Plan includes High Holborn/Kingsway as part of the Central Activities Zone (CAZ), which has an international, national, and London-wide role through its mix of strategic functions and local uses. The policy specifically states that the "*unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions should be promoted and enhanced*".
- 8.7. The proposed use of the application site as a visitor and cultural attraction would have the main focus of providing a new heritage exhibition space in the 'streets' portion of the site, which would explore the history of the tunnels and their strategic importance through modern history, specifically during World War Two and the Cold War. The attraction would be presented in an interactive fashion, allowing visitors to take part in an immersive experience. There would also be a flexible exhibition space provided in the 'avenues' portion of the tunnels that would allow for temporary instalments and events to taken place independently of the historic exhibition area, as well as the repurposed bar, also located within the tunnels themselves.
- 8.8. The supporting documents state that the cultural use would attract as estimated two million visitors annually, with a peak occupancy of 750



visitors per hour at peak times and an average expected occupancy of 560 visitors per hour (though the tunnels are capable of accommodating 1,310 persons, as set out in the submitted fire statement). This would generate an increase in footfall in the surrounding area, subsequently contributing to activity within and growth of the CAZ and the Holborn Central London Frontage.

- 8.9. Although the proposed use does not fit neatly into any one clearly defined category, the use as a visitor and cultural attraction would be considered to provide a cultural facility in the spirit of those outlined in the aforementioned policy; the permanent heritage exhibition providing a use comparable to that of a museum, and the flexible exhibition space providing a use more akin to that of an arts venue or archive/collection. As such, the proposal would support the Council's policies to encourage cultural and leisure facilities.
- 8.10. The potential for the site to attract large amounts of visitors also would help support the objectives of the Council with regards to tourism; Policy E3 (Tourism) of the Local Plan recognises the importance of the visitor economy in Camden and states that new, large-scale tourism development would be located in Central London, particularly the growth areas – including Holborn. The location of the proposed attraction within the Holborn growth area and the CAZ would make it an appropriate place for tourism development of this kind, particularly due to its close proximity to public transport.
- 8.11. It should also be noted that the area of Holborn has suffered particularly since the Covid pandemic, largely due to its nature as a commercial hub and since the rise in virtual working. As a result, footfall levels have fallen and are still yet to recover to pre-pandemic levels; the draft Holborn Vision document notes that footfall has now stabilised, but is considerably lower than pre-pandemic levels. The expected numbers of visitors that the proposed attraction would bring would contribute significantly to supporting the vibrancy and function of the area.
- 8.12. The tunnels and portion of the site located at 31-33 High Holborn are currently vacant, and have only been used for storage since approximately 1990. The proposed use would create an estimated 105 new staff roles, which would comply with Policies E1 (Economic development) and E2 (Employment premises and sites) of the Local Plan. Further detail on this element of the development is provided in section 18 of this report, but in principle, the proposed land use is acceptable in that it would bring a currently vacant site into employment use, providing new jobs in the process.
- 8.13. The proposal would be providing an appropriate leisure and entertainment use that would keep the centre vibrant and attractive, as well as benefitting

the local economy through a potential increase in footfall. The close proximity to public transport in practically all directions would also allow for easy accessibility to and from the site. The subterranean nature of the development and use of Chancery Station House as a secondary access point would also mean that there is not expected to be any significant impacts on nearby residential uses – this is discussed further in section 10 of this report. Regardless, the grant of permission is recommended subject to a Section 106 legal agreement that would secure an Operational Management Plan, which would ensure that the proposed change of use does not result in unacceptable harm to the amenity of nearby residents and that it would continue to be acceptable in land use terms. The operational hours of the development would also be secured by condition (conditions 5 and 6), as set out in the ‘amenity’ section of this report.

- 8.14. A condition has been recommended that would restrict the use of the site to the approved use only, and prevent the use for any other purposes (condition 3). This would give the Council greater control over the site so it can be guaranteed that the use continues to contribute to the area. Similarly, a separate condition would secure the provision of the respective uses in terms of floor area, to give greater control over the site (condition 4). These match conditions imposed by the City of London.
- 8.15. Overall, the proposed use is considered to be protect and enhance the role and unique character of the Holborn Central London Frontage, providing variety and vibrancy for visitors to the area. The use would also support the growth of tourism, contributing to economy of the area, the borough, and London more widely. As such, the proposed development is considered to be in accordance with Policies TC2, TC4, E1, E2, and E3 of the London Borough of Camden Local Plan, and is therefore acceptable in terms of land use.

## **9. DESIGN AND HERITAGE**

- 9.1. The Council’s design policies are aimed at achieving the highest standard of design in all developments. Policy D1 (Design) of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance, and character of the area, whilst Policy D2 (Heritage) states that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas. Camden’s Local Plan policies are supported by the Camden Planning Guidance ‘Design’ and the Bloomsbury Conservation Area Appraisal and Management Strategy.
- 9.2. The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) provides a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas and their settings. Considerable importance and weight should be attached to

their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption.

- 9.3. The duties imposed by the Listed Buildings Act are in addition to the duty imposed by section 38(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicated otherwise.
- 9.4. The National Planning Policy Framework (NPPF) requires its own exercise to be undertaken as set out in Chapter 16 – ‘Conserving and enhancing the historic environment’. Paragraph 201 requires local planning authorities to identify and assess the particular significance of any heritage assets that may be affected by a proposal. Paragraphs 205-208 require consideration as to the impact of a proposed development on the significance of a designated heritage asset, including an assessment and identification to any harm/the degree of harm. Paragraph 209 requires the effect of development on the significance of non-designated heritage assets to be considered when determining the application.
- 9.5. The proposal involves the change of use of the tunnels, the redevelopment of the existing buildings on Furnival Street, and the creation of a new pedestrian entrance at 31-33 High Holborn. Although the redevelopment at Furnival Street includes the demolition and rebuilding of an existing building, this falls within the boundary of the City of London and so is not considered as part of this assessment. There are very limited external works within the boundary of the London Borough of Camden, mostly restricted to the alterations to the existing building at 31-33 High Holborn to create a pedestrian entrance.
- 9.6. The nearest listed buildings and scheduled monuments to 31-33 High Holborn are the Cittie of Yorke Public House and Gatehouse fronting onto High Holborn (both Grade II listed). The access point at Fulwood Place is located within the Bloomsbury Conservation Area, and the tunnels run



underneath the Hatton Garden conservation area (though at no point is there any above ground access point in the latter). The heritage assets in proximity of the site, including listed buildings and conservation areas, are shown in figure 7 below.

*Figure 10: Map showing nearby heritage assets including Conservation Areas and listed buildings.*

- 9.7. No part of the development is listed, though the tunnels are considered by officers to be a non-designated heritage asset due to their uniqueness and historic interest. Historic England's consultation response to this application confirmed they also shared this view.
- 9.8. The building at 31-33 High Holborn is a striking five-bay red brick commercial building of Edwardian appearance. Although the upper storeys are asymmetrical, the stone-faced ground floor (that formerly served as the entrance to Chancery Lane Underground Station) has a central arched doorway flanked by pairs of loosely Baroque arched openings. The building is considered to make a positive contribution to the Bloomsbury Conservation Area.
- 9.9. The existing arrangement to the ground level arches of the front façade consist of an alley on the furthest left arch, two inset full height glazed doorways to the left-of-centre and centre arches, and two full-height glass shopfronts to the two arches on the right, which are bisected by a low-quality fascia. The proposal seeks to install three sets of doors in the apertures and a fully glazed shopfront to the furthest right arch. These would aim to give the front façade a more historic appearance that is more appropriate for the character of the building. The proposal is acceptable in principle, but the level of glazing is more than would generally be encouraged. However, given the existing condition of the shopfront, the works would be considered to be an improvement that would serve to enhance the character and appearance of the conservation area, particularly given the removal of the fascia boards. Due to the fact that the drawings provided at this stage are more indicative in nature, further details would be sought by condition (condition 9), allowing the Council to ensure that any alterations are acceptable and preserve or enhance the character and appearance of the conservation area.
- 9.10. The proposal does also include minor alterations to the alleyway leading to Fulwood Place, as well as the rear of the site. These involve the installation of lighting for wayfinding purposes and the replacement of existing block windows at the north elevation with louvres for use in the event of emergency. Intake louvres for ventilation would also be installed to the western façade, which would be at high level and match the utilitarian appearance of this part of the building, so are acceptable. As before, the documents that have been provided at this stage are indicative,

but the general principle of the additions are acceptable – further details would again be secured by condition (condition 9).

- 9.11. Should any further external alterations be required in the future, these would need to be the subject of a separate planning application, as required. This includes any changes to the building's signage, which would require an advertisement consent application.
- 9.12. Whilst land use can to some degree affect the significance of a heritage asset – be it a building or conservation area, in this case the proposed development involves a suitable change to the structure's use (including the tunnels), and would not be considered to affect the significance of the Bloomsbury Conservation Area. The repurposing of the tunnels for the purposes proposed would be suitable, particularly due to the link with the heritage value of the tunnels and their historic importance.
- 9.13. As such, the proposed development would not impact the character or appearance of the host site (including both the building and the tunnels), nor the Bloomsbury Conservation Area, and so would be in accordance with Policies D1 and D2 of the London Borough of Camden Local Plan.

## **10. IMPACT ON NEIGHBOURING AMENITY**

- 10.1. Policies A1 (Managing the impact of development) and A4 (Noise and vibration) of the Local Plan seeks to protect the amenity of Camden's residents by ensuring that the impact of development is fully considered and does not harm the amenity of neighbouring residents. This includes light, privacy, outlook, and noise disturbance. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.
- 10.2. Due to the extremely limited nature of the proposed external alterations within the Camden boundaries, it is not expected that there would be any impact on the amenity of residents of the borough in terms of opportunities for overlooking, privacy, outlook, daylight, or sunlight. The principal considerations therefore would be the potential impact of noise and disturbance arising from the proposed use itself and from visitors arriving at, entering, and leaving the premises.
- 10.3. The section of the site located at 31-33 High Holborn, otherwise referred to as the 'Fulwood Place' section of the site, provides the secondary entrance to the attraction. It is intended for this entrance to be used primarily for school visits and VIP visitors to the tunnels, as well as users of the bar. The access to this part of the site is through a side door located on the Fulwood Place passage that runs along the side elevation of the building.

- 10.4. The nearest residential properties and noise-sensitive receptors are located above the site, in the residential units at the upper levels of 31-33 High Holborn. Otherwise, there is a relatively low concentration of residential units, in part due to the commercial nature of the area and the close proximity to High Holborn, a busy main road (see figure 8 above).



Figure 11: Map showing nearby residential uses.

#### **Noise, disturbance, and operational management**

- 10.5. Given that the Fulwood Place entrance to the site is secondary in nature and as such would have limited use, it is not considered that there would be any significant disturbance from the proposed change of use. The proposed hours for the main attraction are 10:00-20:00, which would not be considered to cause disruption or negatively impact residential amenity. The proposed hours of the bar are 10:00-01:00 (the following day), though the applicant has suggested that it would be unlikely to operate this late most of the time, with a closing time of 23:00 potentially being more likely. However, the potential of special events that run later mean opening hours until 01:00 are sought. Given the subterranean nature of the bar, it is not expected that there would be any disruption in terms of noise breakout that would negatively impact amenity. The hours are considered reasonable given the location of the site within a busy commercial area, and subject to controls surrounding operation and access to and from the site.
- 10.6. This entrance would primarily be used for school visits, which would only take place in the daytime. The secondary use would be to provide access to the bar; once the main attraction closes, the bar would remain open, but visitors would arrive and depart via the Fulwood Place entrance so as to avoid having to move through the tunnels. Access to the bar would be through pre-booking only, so visitors would not be able to simply arrive at the door, and visitors would only be able to access the bar and no other

part of the tunnels. Due to the relatively small capacity of 160 (including staff, security, and customers), the arrival of visitors to the site would be able to be managed with minimal impact, and there is sufficient space within the building to accommodate visitors whilst they wait to take the lifts down into the tunnels. Additionally, the nature of egress from the site by way of lift means that it is not likely or indeed necessarily possible for there to be mass departures from the site at any one time that would cause significant disturbance.

- 10.7. The site itself is predominantly subterranean in nature, but the above-ground Fulwood Place part of the site is located in the context of a busy London centre on one of the busier roads in the borough. As noted in the 'land use' section of this report, this part of the borough is considered to be appropriate for entertainment and leisure uses, and this must be factored into consideration; it should also be noted that residents in this part of the borough already live in a very commercial area, and this proposal would not be expected to result in significant impacts or exacerbation of this.
- 10.8. It should also be noted that the bar will be subject to licensing controls from the licensing regime, which is one of the main tools for managing night-time entertainment venues. This sits separately from the need for planning permission and any controlling conditions.
- 10.9. Nonetheless, it is recommended that an Operational Management Plan is secured by way of legal agreement. This would cover the management and operation of the site, and would be expected to cover and provide details on elements such as the following:
  - Details of opening and operating hours;
  - Details of measures to manage occupancy levels;
  - Details of measures to manage arrival at and departure from the site, including customer queuing;
  - The role of security in managing entry to the site, specifically the bar when operating outside of the main attraction hours (e.g. 20:00-01:00). This should include measures such as bag checking, pre-booking, and ticket management;
  - Evidence of consultation with community groups;
  - Details of code of conduct shared with all visitors setting out expected standards within and in the immediate vicinity of the site;
  - Information about a representative (including name and contact details) who would be made available to the Council and all local residents at all times to ensure any issues or concerns are dealt with in an efficient and effective manner – including details of a formal complaints procedure to be adopted so that complaints are formally logged and dealt with;

- A review mechanism that allows for reviewing and updating the Operational Management Plan as reasonably required by the Council and/or City of London.
- 10.10. Given the nature of the development, the Operational Management Plan would be discussed and agreed with both Camden and the City of London, so that concerns are dealt with in a sensible and rational manner and the plan can be effectively implemented.
- 10.11. Details of how the occupancy levels at the site would be managed, as well as the specific details regarding arrivals and dispersal, would be secured within the Operational Management Plan. This would help alleviate any potential impact on residential amenity in the immediate area. Similarly, the capacities and operating hours of both the main attraction and the bar would be secured by condition (conditions 5-8), which would reduce any potential impact on amenity from late-night access or egress, along with the provisions within the Operational Management Plan.
- 10.12. The applicant has also provided a noise and vibration impact assessment as part of the submission, which outlines any potential impact from the plant equipment associated with the proposed use. The configuration and layout of plant at this point is not yet known, and will not be able to be established until a later point in the detailed design stages of the scheme. At this point, the applicant has stated that a further assessment of the plant noise emissions would be provided. If in the future any plant equipment is proposed that would be external, this would require a separate application for planning permission.
- 10.13. The above assessment has been reviewed by the Council's Environmental Health Officer, who has confirmed that the proposal is acceptable in environmental health terms. Appropriate noise guidelines have been followed within the submitted report and the plant noise criteria have been adequately predicted, taking into consideration distance losses, surface acoustic reflections, and where applicable, screening provided by the building.
- 10.14. The precise configuration and layout of the fixed plant equipment is yet to be finalised; although the Council would ordinarily want to see details of the proposed plant prior to determination of an application, it is understood that in this specific scenario, the number and nature of plant equipment is difficult to define at this stage of the scheme. As mentioned previously, any external plant would require an application for planning permission, but the internal plant is acceptable in principle and could be covered by condition. Therefore, conditions are recommended (condition 27-29) to require a further noise impact assessment, anti-vibration measures, and odour abatement and extract system to be submitted and approved once detailed design has made it possible to establish the exact details



regarding plant equipment. This will enable a more accurate determination of the potential impact on noise-sensitive receptors and the implementation of any noise mitigation measures.

### **Construction**

- 10.15. Due to the nature of the extensive refurbishment throughout the site, it is considered necessary to secure a Construction Management Plan, which would help to ensure that the amenity of residents is protected, in accordance with Policy A1. This is covered in more detail in the 'transport' section of this report, specifically paragraphs 12.38 - 12.45.

### **Access**

- 10.16. Policy C6 (Access for all) of the Local Plan states that the Council will seek to promote fair access and remove barriers preventing equal access to facilities – this includes through expecting all buildings and places to meet the highest practicable standards of accessible and inclusive design so that they can be used safely, easily, and with dignity by all.
- 10.17. The nature of the subterranean aspect and existing structure of the tunnels are worth noting, as these do result in subsequent constraints with regards to accessibility. However, the Design and Access Statement submitted with the application includes a specific section on accessibility, which confirms that the proposed development has been carefully designed around the constraints of the existing buildings and structures to ensure that the access needs of all users have been considered.
- 10.18. Although outside the boundaries of Camden and therefore not subject to Camden's policies, the new construction at Furnival Street has been designed to allow for step-free access, which is welcomed. The Fulwood Place section of the site would also provide step-free access, the details of which is secured by condition (condition 9).
- 10.19. It should be noted that the lifts in the Fulwood Place section of the site that provide access to the tunnels do not appear to meet the recommended size set out by BS 8300-2:2018 for users of larger mobility vehicles. This has been discussed with the applicant, who has confirmed that they will be able to accommodate an increased lift size within the existing shaft structure that would be compliant – this is particularly important given the involvement of the lifts in the evacuation strategy, detailed later in the 'safety and security' section of this report. The details of the lifts are secured by condition (condition 10) so that these can be reviewed and confirmed to be compliant.
- 10.20. Within the tunnels themselves, internal alterations would ensure that the publicly accessible parts of the attraction are accessible, including for those with limited mobility. All tunnels vary in width between 3m and 7m,

allowing sufficient space for wheelchairs to pass each other, and corridors to access facilities such as toilets would be no less than 1.2m wide. The tunnels are mostly level, with some sloping/ramped sections that will be refurbished to comply with Part K. Routes to restricted areas are stepped, as well as one toilet block, but a wheelchair-accessible toilet will be provided on an accessible route nearby.

- 10.21. Given the above details that have been provided, the applicant has demonstrated that the proposed development has considered and provided assurance that provisions are made for visitors with limited mobility – including older people or those with disabilities. As such, the Council is satisfied that the proposal has demonstrated how those with protected characteristics have been considered in the design of the development, in accordance with the Public Sector Equality Duty.
- 10.22. In summary, the details provided, obligations secured, and conditions suggested would ensure that the impact of the proposal on the amenity of neighbouring residential properties would be limited. This includes consideration of the proposal in terms of noise, disturbance, and construction impacts. As such, the proposal is considered to comply with Policies A1 and A4 of the London Borough of Camden Local Plan.

## **11. SAFETY AND SECURITY**

- 11.1. Policy C5 (Safety and security) of the Local Plan requires that development incorporate design principles that contribute to community safety and security, as well as ensure that vulnerabilities to crime and terrorism are addressed. Policy D11 of the London Plan also requires schemes to work with Designing Out Crime Officers (DOCOs) from the Metropolitan Police Service to design and maintain a safe and secure environment, ensuring that development includes measures to design out crime in proportion to the risk.
- 11.2. As part of the proposal, the DOCO that advises Camden was consulted, whose response is detailed in the earlier 'consultation' section of this report.
- 11.3. A Security report has been prepared and submitted as part of this application, which focuses primarily on internal attacks in the tunnels and proposes mitigation measures to alleviate any concerns. These includes measures such as the introduction of bag scanning and searching system at check-in, pre-booking of any and all visits, and the provision of locker rooms at ground level, where visitors could leave personal items that cannot be taken into the tunnels. The visits themselves would also operate with a grouping system to ensure an appropriate flow of visitors through the attraction. The site would be monitored through video surveillance systems, and CCTV would be utilised throughout to monitor and prevent

illegitimate entry. The site would also be lit at points that would otherwise potentially risk generating anti-social behaviour – in particular to the passageway that links High Holborn and Fulwood Place. Further details of the lighting strategy would be secured by condition (condition 26).

- 11.4. The bar component of the site would also be pre-booked, with no potential visitors being able to arrive and attend without making a booking beforehand. The primary access for the bar would be via Fulwood Place, where security controls would be in place, but access may also be integrated into the standard tours offered as part of the attraction. Further details of this would form part of the Operational Management Plan, secured by legal agreement. This would involve details relating to crowd management, access and egress from the site, dispersal, and management of visitor levels throughout the site, and would help prevent anti-social behaviour and alleviate risk to public safety.
- 11.5. The Camden DOCO has reviewed the proposal, and Counter-Terrorism Security Advisers (CTSA) have reviewed the application submitted to the City of London. As the applications are identical, their response is valid with regard to this assessment also. CTSA visited the site and provided advice based on this and the Security Report; this does not necessitate planning conditions, however the applicant has been advised to consult CTSA throughout as plans evolve; an informative has been added to this effect. Similarly, an informative has been added to advise the applicant to consult the Camden DOCO throughout later design stages to ensure the site is protected from the risk of crime as the detailed design and plans for the site develop. Details of security measures for the site are confidential and as such are not available in the public domain.
- 11.6. Taking into account the responses received from CTSA and DOCO and the assurances secured by the Operational Management Plan, officers are satisfied that the proposed development would comply with Policy C5 of the London Borough of Camden Local Plan, specifically with relation to security and the risk from crime, anti-social behaviour, and terrorist threat.

### ***Fire safety***

- 11.7. Policy D12 of the London Plan specifically relates to fire safety, and states that development proposals must achieved the highest standards of fire safety, ensuring that schemes are designed to incorporate appropriate features reducing risk and provide suitable means of escape with associated evacuation strategies. This is supported by Policy D5, which requires that development provides safe and dignified emergency evacuation for all building users – including those who require level access. This involves a minimum of at least one lift per core to be a suitably sized fire evacuation lift that can be used in the event of emergency.

- 11.8. The application has been submitted with a Fire Statement in accordance with London Plan policies and fire safety regulations. This addresses the fire safety considerations for the project, which are particularly unusual given the subterranean nature of the development and the subsequent unique circumstances arising from this. The statement confirms that the project's unique nature means that traditional guidance documents are insufficient to meet the objectives of Part B of the Building Regulations; an engineered and risk-based design approach is proposed, which incorporates a Basis of Design document that draws from other guidance to ensure sufficient safety and compliance with fire safety regulations.
- 11.9. In the event of fire within the tunnels, the installed water-based suppression system would be the first line of defence, whilst a separate smoke detection and alarm system would shut off the fire shutters of the fire compartment. This compartmentation would provide multiple fire separation layers between occupants and the source of fire so that visitors would be able to move towards the protected lobbies and the evacuation shafts. Refuge lobbies would not feature any combustibile materials and would be pressurised so that smoke can be easily cleared in the event of fire.
- 11.10. In line with the aforementioned policies of the London Plan, two vertical evacuation lifts would be available at both main entrances to the site. Furnival Street would provide the emergency exit for the east side of the tunnels, and Fulwood Place would provide the emergency exit to the west side of the tunnels. Vertical evacuation would be possible through these lifts, and firefighters would be able to simultaneously access the tunnels through separate lifts at the same time as evacuation takes place, by way of designated firefighting lifts. The proximity of the Fulwood Place shaft to High Holborn would mean that firefighting emergency services would be able to park on the highway when accessing the tunnels.
- 11.11. The Council's Building Control Officer has reviewed the submitted fire statement and confirmed that they consider it satisfactory for the purposes of the London Plan Policies D5 and D12. Access provisions are noted to be satisfactory for the purposes of building regulations but would be developed further at detailed design RIBA stages – however, the principles of access into and egress from the building have been established in accordance with requirements.
- 11.12. Due to the concerns surrounding fire safety and the unusual nature of the site, the London Fire Brigade (LFB) were consulted on the application, who have provided comments on the application. These include a number of measures and areas that would need to be considered at the post-planning stage, as well as recommendations for potential conditions to be attached to any decision.

- 11.13. The LFB advises that the general approach outlined by the applicant is supported, by recommends that the Qualitative Design Review process should involve LFB as a key stakeholder. This process would take place post-planning and so is not a planning consideration, as this would fall under the Building Regulations regime. However, it should be noted that there are several areas of concern that have been identified for review, including extended travel distances, inclusive design, radio communications, use of electric powered vehicles, and construction phase fire safety. These matters would be expected to be covered and considered as part of the Qualitative Design Review process, and an informative has been added to remind the applicant that the LFB would be expected to be involved as a key stakeholder at the post-planning stage. Nonetheless, a condition has been attached (condition 11) to secure the provision of a fire statement prior to occupation, which would take into account any changes or revisions that may have come out of the detailed design stage.
- 11.14. Notwithstanding the above, the applicant has provided a response to LFB's concerns. This notes the issues raised in the consultation response and confirms measures that would be taken to address these where relevant/feasible – such as clarity regarding the placement of landing valves (fire main outlets) and a commitment to assess alternative communication systems during design stage. Crucially, this also includes details regarding inclusive design – specifically the utilisation of Personal Emergency Evacuation Plans (PEEPs) for individuals with limited or restricted mobility and/or other disabilities, as well as provision of alarm systems that provide visual as well as audio signals.
- 11.15. The applicant's response and details provided (including the Access Plan noted in the previous section on amenity) would provide assurance that provisions are made for visitors with limited mobility – including older people or those with disabilities. As such, the Council is satisfied that the proposal has demonstrated how those with protected characteristics have been considered in the design of the development, in accordance with the Public Sector Equality Duty.
- 11.16. In summary, the details provided and the commitment of the applicant to work with the London Fire Brigade at the post-planning stage are satisfactory. The proposed development is therefore considered to meet the requirements of Policies D5 and D12 of the London Plan.

## **12. TRANSPORT**

### ***Policy Review***

- 12.1. The Council's transport policies are aimed at promoting sustainable methods and means of transport so as to improve the health of the

borough's residents, improve air quality, and strengthen communities. The Camden Planning Guidance 'Transport' supports these policies.

- 12.2. Policy T1 (Prioritising walking, cycling, and public transport) of the Local Plan requires developments to promote sustainable transport by prioritising walking, cycling, and public transport through methods such as improving the pedestrian environment and creating a safe and accessible environment for cyclists.
- 12.3. Policy T2 (Parking and car-free development) seeks to limit the availability of parking and require all new developments to be car-free, including by using legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits.
- 12.4. Policy T3 (Transport infrastructure) sets out how the Council will seek improvements to transport infrastructure in the borough, including by protecting existing and proposed routes and facilities.
- 12.5. Policy T4 (Sustainable movement of goods and materials) addresses how the Council will promote the sustainable movement of goods and materials including encouraging transportation by methods such as canal, rail, and bicycle and minimising the movement of materials by road.
- 12.6. As noted in the 'policy' section of this report, the Council has published its Draft Camden Local Plan, which sets out the vision for future development in Camden for the next 15 years. Of particular importance to this development is the Holborn Liveable Neighbourhood (HLN) scheme, which is an infrastructure priority that is relevant to this case and discussed later in this section of the report.
- 12.7. 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 our objectives, policies, and measures for achieving this goal. 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
- 12.8. In 2023, the Council reviewed its progress so far on the CTS and also set out our delivery plan for the period covering 2024/25. This was presented to the Culture and Environment Scrutiny Committee on 6<sup>th</sup> February 2024.

The plan includes commitments, all of which are pertinent to this application, and which will be expanded upon later in this report, to:

- Implement proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists by significant road safety improvements via the Holborn Liveable Neighbourhood scheme
- Continue to expand our dockless bike and e-scooter hire network
- Contribute towards the implementation of the CTS Cycling Action Plan

12.9. Camden's Clean Air Action Plan and Climate Action Plan also contain policies which are relevant to the transport assessment of this application.

12.10. The London Plan's policies on transport (specifically T1-T7 and T9) are relevant to this application. Policy T1 (Strategic approach to transport) states that Development Plans should support and development proposals should facilitate the delivery of the Mayor's strategic target of 95% of all trips in central London to be made by foot, cycle, or public transport by 2041. The policy also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

***Site location and access to public transport***

12.11. The site is located in the Holborn district of Central London and in its totality, extends across both The London Borough of Camden and the City of London. The 'tunnels' section of the site is located approximately 32 metres below ground and runs underneath High Holborn. There are two existing ground level access points, the first of which is located at 31-33 High Holborn in the London Borough of Camden and the second of which is located at 38-41 Funnival Street in the City of London.

12.12. The site is located within Holborn part of the Central London Area. High Holborn (that the tunnels run under) 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. Fulwood Place is also in close proximity to Farringdon Road, which is part of TfL's Transport for London Road Network (TLRN).

12.13. 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 Fulwood Place are Chancery Lane and Holborn, which are located approximately 100m to the east and 600m to the west,

respectively. Farringdon Station is also located approximately 600m to the west, which also provides National Rail and Elizabeth Line services. The closest bus stops to Fulwood Place are located on High Holborn near Chancery Lane Underground.

12.14. 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, Kings Cross, and St Pancras railway stations. The nearest Santander cycle hire docking stations are located on Red Lion Street, Holborn Circus, New Fetter Lane, and Hatton Garden.

12.15. 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.

#### Holborn Liveable Neighbourhood

12.16. The Council is currently developing proposals which will transform the public realm in the area and aim to 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 where Fulwood Place is located, is currently estimated as approximately £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”*.

12.17. The Council will therefore seek to secure financial contributions towards the overall scheme costs from development funding. To this end, a contribution from this particular development is discussed later in this section of the report. Construction of the Holborn Liveable Neighbourhood 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. A condition has also been attached to secure a wayfinding strategy (condition 12) that would work towards the aims of the Holborn Liveable Neighbourhood.



### **Trip generation**

- 12.18. The trip generation submitted with this application was calculated by reviewing the theoretical capacity for the 20 busiest days of the year (bank holidays, etc) based on a density of 6.53 sqm per person in the tunnels, which equates to a maximum of 1,020 visitors on site with 750 pp/hr in the tunnels. A normal day (weekday) was calculated at 10sqm per person which equates to 490pp/hr in the tunnels and 760pp/hr across the site. There will be 85 members of staff between all land uses on-site and 14 off-site management staff.
- 12.19. Annually, the proposal is expected to attract approximately 2.4 million visitors. A standard visitor is estimated to spend a total of 1 hour and 20 minutes at the site. To calculate the number of two-way visitor trips at the site, the maximum capacity of the tunnels and the capacity of the vertical transportation, i.e. lifts, was considered. The calculation estimates 1,500 two-way visitor trips per hour.
- 12.20. The London Postal Museum, which is located 965m away from the site and similarly provides an underground experience with exhibitions, was used to offer understanding on the likely mode share, which is based on its 2013 Transport Statement produced by SKM Colin Buchanan. It should be noted that the Postal Museum did not include coach trips, whilst the proposal is projected to generate coach and taxi trips. Therefore, an adjustment to the mode share includes a 5% modal share for coach travel.
- 12.21. Table 6.5 in the Transport Assessment, which is reproduced below for ease (figure 9), presents a Multi-Modal Trip Generation for the proposed development.

**Table 6-2 – Mode Share Comparison**

<b>Mode</b>	<b>Museum of London (Smithfield) (%)</b>	<b>Museum of London Docklands (%)</b>	<b>Hackney City Farm (%)</b>	<b>London Eye (%)</b>	<b>London Transport Museum (%)</b>
Pedestrian	15	26	56	27	39
Public Bus	12	5	11	15	16
Train / Underground	65	60	4	51	42
Car	1	1	6	0	0
Cyclist	0	8	22	7	4
Taxi	1	0	0	0	0
Coach	6	0	0	0	0

*Figure 12: Table 6.5 from Transport Assessment showing Multi-Modal Trip Generation.*

- 12.22. As shown above, considering the car-free nature of the proposal and the excellent availability of public transport services, a significant proportion of trips are expected to be taken by foot, bicycle, or public transport – approximately 92%.
- 12.23. Fulwood Place will provide access for staff, VIP guests, school children and public visitors to the bar, whilst 38-41 Furnival Street in the City of London will be the primary access for visitors. The proportion of trips using Fulwood Place/Furnival Street entrances is not known. The bar, accessed from Fulwood Place, has a capacity of 120 people, and is proposed to be opened between 10am and 1.00am. According to 'Figure 4-5 - Bar Access Route' presented in the Transport Assessment, the visitors entering the exhibition at Furnival Street would gain access to the bar, and then exit via Fulwood Place. This will result in additional trips at Fulwood Place.
- 12.24. The anticipated high volume of the walking trips to and from Fulwood Place entrance is likely to be made from the London Underground stations at Chancery Lane, Farringdon (also providing rail services), and Holborn, as well as the bus stops on High Holborn.
- 12.25. An Active Travel Zone (ATZ) assessment included in the TA focuses on six routes to key destinations from the site, such as the British Museum and Farringdon Station. Analysis shows that most routes would benefit from the more frequent provision of benches and places for stopping to enable an improved hospitable environment to pedestrians. The improvement of the pedestrian experience along these routes is part of the reason that a pedestrian, cycling, and environmental improvements contribution is sought, as detailed later in this section.

### ***Travel planning***

- 12.26. A Travel Plan was submitted in support of the planning application. This is welcomed given its demonstration of a commitment to encouraging and promoting trips by sustainable modes of transport. The Travel Plan would be secured by legal agreement, along with an associated monitoring and measures contribution of £11,348.

### ***Access and permeability***

- 12.27. The Fulwood Place entrance is reached via an alley of approximately 20m in length and 2m in width at its narrowest point, on the northern side of High Holborn. Fulwood Place itself is a well-lit pedestrian only street, and the Pedestrian Comfort Level Assessment shows no negative impact of development on Fulwood Place, with the additional pedestrian traffic being comfortably accommodated at this location.

### ***Cycle parking***

- 12.28. The Council requires high quality cycle parking to be provided in accordance with the Local Plan Policy T1, CPG 'Transport', the London Cycling Design Standards (LCDS), and the London Plan Policy T5. It is proposed to provide cycle parking in line with London Plan D1 land use 'Other', which is 1 long stay space per 8 FTE staff, and 1 short stay space per 100 sqm (GEA).
- 12.29. Based on the minimum standards set out in the London Plan, there would be a requirement for 11 long stay spaces and 125 short stay spaces. According to the Travel Plan, it is proposed to provide 112 short stay cycle parking spaces within the public realm and 12 cycle parking stands within the development for staff use. The long stay spaces would all be provided within the Furnival Street building or the tunnels themselves, both within the boundary of the City of London. It has been agreed to split the provision of short stay spaces between the two boroughs, with the City of London accommodating 80% of the required provision and the London Borough of Camden accommodating the remaining 20%. Given the constraints and nature of the site, it is accepted that the provision can be provided off-site at a nearby location, with an area suggested within Fulwood Place. This area would be sufficient for Sheffield type stands, so a financial contribution of £4,800 would be sought as payment in lieu of cycle provision on-site, which would approximately provide 22 spaces (or 11 Sheffield stands) and therefore quantify approximately 20% of the short stay provision. This contribution would be secured by legal agreement.

### ***Car parking and vehicle access (including coaches and taxis)***

- 12.30. Fulwood Place is located in controlled parking zone CA-D (Kings Cross Area), which operates 08:30-18:30 Monday to Friday, and 08:30-13:30 on Saturday.
- 12.31. The development is proposed car-free, which is in accordance with Local Plan policies and would be secured by legal agreement. The existing blue-badge space located on Furnival Street in the City of London is proposed to serve the development, and there would also be an additional bay for blue-badge parking provided – also on Furnival Street, a short distance south of the site in close proximity to the existing bay. This complies with the London Plan requirements, though is not assessed by the policies of the Camden Local Plan (given it falls outside the borough boundaries).
- 12.32. Officers expect the large majority of visitors to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'electric vehicles only' parking bay within the controlled parking zone. The uptake of electric vehicles is increasing significantly, and there are many electric vehicle resident permit holders in the vicinity of the site. This

would put pressure on infrastructure that has been provided primarily for local stakeholders, so officers therefore suggest an additional electric vehicle charging point (fast charger) is provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 towards this is sought, which would be secured by legal agreement.

- 12.33. As a result of the nature of the proposed use, the development is likely to generate coach trips for both school trips and general visitors. It is expected that the majority of coach trips will be linked to visits to other London attractions, which is likely given that the tour of the site is only estimated to take between 60-90 minutes (on average). No dedicated coach parking will be provided, and the applicant has committed in the submitted Transport Assessment to actively discourage travel to the site by coach including through the travel plan and advertising.
- 12.34. It has previously been suggested that, were a coach to arrive near the site, the coach bay on High Holborn outside the Rosewood Hotel could be utilised. However, this coach bay no longer exists, so coaches cannot set down and pick passengers there. The possibility of coaches setting down and picking up from the southern part of Kingsway was also raised, however this would not be supported by the Council; buses currently experience reliability issues with journey times on Kingsway, and bus priority measures are being considered to be introduced there, so coach activity may conflict with this.
- 12.35. To alleviate any concerns regarding the possibility of the site attracting the arrival of coach parties that would cause delays and safety issues on Holborn and in close vicinity of the site (which may be outside the applicant's control), it has been agreed to prevent any coach party bookings from being offered at the site, as well as a restriction on customers being picked up or dropped off by coach at any time directly outside the site's entrance at 31-33 High Holborn. These assurances would be secured by legal agreement.
- 12.36. It is likely that some school visits may travel to the site by coach. Whilst they would not be able to set down directly outside the site, there would be sufficient areas in the general vicinity that could be used to drop off school children with only a short walk to the site. They would then be able to walk to the Fulwood Place entrance aided by wayfinding signage and members of staff of the London Tunnels. Coach drivers would not be permitted to wait on High Holborn, in line with existing restrictions.
- 12.37. There is no dedicated taxi drop off and pick up areas proposed, with taxis being able to pick up and drop off on the highway in line with the existing situation for surrounding land uses.

### ***Construction management***

- 12.38. Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). An Outline Construction Traffic Management Plan was submitted. The primary construction access point will be at 38-41 Furnival Street (City of London) where the existing building is proposed to be demolished and rebuilt, and the Fulwood Place lift shaft will be used to enable continuous access to the site, including for fit-out and refurbishment works to the tunnels.
- 12.39. Considering the demolition and construction programme will involve Fulwood Place, a Construction Management Plan using the Council's CMP pro-forma is required to be provided in support of the planning application. Given that there are no demolition works proposed within Camden, it is not considered that a Demolition Management Plan would be required in this instance. The applicant is requested to refer to the London Borough of Camden's guidance on construction management.
- 12.40. The site is partially located within the Hatton Garden Conservation Area to the north of Holborn, which forms part of the Strategic Road Network (SRN). Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day during the regular working week. The Council's primary concern is public safety, but it also must be ensured that construction traffic does not create or add to existing traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. More detailed Construction Management Plan (CMP) documents will therefore be secured by legal agreement in accordance with Local Plan policies.
- 12.41. The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. Considering the proximity of St Alban's CE Primary School to the site, 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 with Camden Council.
- 12.42. The 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.

- 12.43. The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.
- 12.44. In association with the aforementioned Construction Management Plan, an implementation support contribution of £30,513 and impact bond of £32,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan policies.
- 12.45. A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction would also be secured by legal agreement.

#### ***Delivery and servicing***

- 12.46. A draft Delivery and Servicing Plan (DSP) was submitted with the application. Furnival Street within City of London will be the primary service point for the site, with Fulwood Place not being used for delivery and servicing activities. If these arrangements were to change, LB Camden should be notified accordingly. The proposed deliveries for the bar to take place on the north side of Holborn outside the bus lane operational hours is considered to be acceptable. A detailed Delivery and Servicing Plan would be secured by legal agreement.

#### ***Highways works***

- 12.47. The proposal would not require any physical alterations to the public highway in the vicinity of Fulwood Place, and it is felt that significant damage to the public highway is unlikely to be caused during demolition and construction. However, Fulwood Place will need to be used during the demolition phase to allow for continuous access to the tunnels, which will require a lane closure on High Holborn. Therefore, it is suggested that a modest highways contribution of £20,000 be secured by legal agreement.

#### ***Pedestrian, cycling, and environmental improvements***

- 12.48. Given the Fulwood Place site entry location in Holborn, and in line with the anticipated increase in cycle and walking trips generated by the proposed development and further promoted by the Travel Plan, a modest financial contribution of £150,000 towards the Holborn Liveable Neighbourhood (HLN) scheme is sought. This would be secured by legal agreement. For further information about this ambitious project, the applicant is requested to visit [HLN website](#).

#### ***Micromobility improvements***

- 12.49. Parking bays for dockless rental e-bikes and rental e-scooters are located in the nearby area. However, these merely provide capacity for existing

usage by residents and people who work in or visit the area. In the event that planning permission were granted and the development implemented, officers anticipate significant demand for more parking bays to be provided in the area. Additionally, it is anticipated that staff and visitors may 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 micromobility vehicles. A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured by legal agreement. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (both by expanding existing bays and providing additional bays).

### ***Transport conclusion***

12.50. The proposal would therefore be acceptable in terms of transport implications, subject to the obligations secured by legal agreement that have been set out throughout this section of the report. To summarise, these obligations would consist of the following:

- Car-free development;
- Construction Management Plan (CMP) alongside CMP implementation support contribution of £30,513 and CMP impact bond of £32,000;
- Requirement to form a construction working group consisting of representatives from the local community;
- Travel Plan and associated monitoring and measures contribution of £11,348;
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000;
- Delivery and Servicing Plan;
- Highways works contribution of £20,000;
- Off-site cycle parking contribution for cycle parking stands of £4,800;
- Pedestrian, Cycling, and Environmental Improvements contribution of £150,000;
- Micromobility Improvements contribution of £10,000;
- Restriction on coach bookings and picking up/dropping off customers by coach outside site's entrance at 31-33 High Holborn.

12.51. Provided that the above contributions are secured, the proposal would be considered to be acceptable in transport terms and compliant with policies T1, T2, T3, and T4 of the London Borough of Camden Local Plan.

## **13. SUSTAINABILITY AND ENERGY**

13.1. 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.

- 13.2. In line with London Plan policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan policies CC1 (Climate change mitigation), CC2 (Adapting to climate change), CC3 (Water and flooding), and CC4 (Air quality), 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.

***Redevelopment strategy***

- 13.3. The proposals seek to reuse and refurbish the existing tunnels which would align with Policy CC1 to improve existing buildings.
- 13.4. The proposals do not include substantial demolition within the borough of Camden and it is not of a scale which would require a Whole Life Carbon assessment, however a Whole Life Carbon assessment has been provided to show that the development has considered the carbon impact of the construction and use of the building over its lifetime. We would look for the results to be in line with the GLA Whole Life Carbon assessment guidance and benchmarks. As there are no benchmarks for this type of development the closest relevant benchmark of 'retail' has been considered.
- 13.5. The efficient use of materials in addition to designing out waste throughout the design and construction process has led to reductions in embodied emissions.
- 13.6. In this case, a Circular Economy Statement has been provided including a Pre demolition audit, which identifies the waste expected from the development in terms of volume, weight, and recoverable proportion. A commitment is made to achieving the London Plan targets of 95 per cent reuse/recycling/recovery of construction and demolition waste and for 95 per cent of excavation waste to be put to beneficial use.
- 13.7. The development plan promotes circular economy principles and Local Plan policy CC1 and London Plan policy SI7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building and to optimise resource efficiency.
- 13.8. In this case, the proposal retains and refurbishes the existing development.
- 13.9. To ensure greater resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and



demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use (condition 13).

**Whole Life Carbon**

- 13.10. The 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. This is split into modules that assess each stage of the building’s life.
- 13.11. The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).
- 13.12. The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are “regulated emissions” and so are considered separately and in detail in relation to the zero-carbon target (see the “Energy and carbon reductions” section below).
- 13.13. The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).
- 13.14. Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again at the end of its life (when it decomposes), so it is included in the total A-C-Modules.
- 13.15. The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square meter of gross internal area in kilograms of carbon equivalent (kgCO<sub>2</sub>e/m<sup>2</sup> GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The tables below show how the development performs against the retail benchmarks, as well as the aspirational targets.

<b>Modules</b>	<b>Benchmark for RETAIL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Aspirational Benchmark for RETAIL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Proposal High Scenario (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>
A1-A5	<850	<550	906
B-C	<200	<140	1427

(ex B6 & B7)			
Total A-C (ex B6&B7 but inc sequestration)	<1050	<690	2333

*Table 1: Summary of Whole-Life Carbon results for the retail development when assuming the proposal is operating with the high energy use scenario.*

<b>Modules</b>	<b>Benchmark for RETAIL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Aspirational Benchmark for RETAIL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Proposal High Scenario (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>
A1-A5	<850	<550	745
B-C (ex B6 & B7)	<200	<140	914
Total A-C (ex B6&B7 but inc sequestration)	<1050	<690	1652

*Table 2: Summary of Whole-Life Carbon results for the retail development when assuming the proposal is operating with the medium energy use scenario.*

13.16. In this case, it is noted that the development is not required to provide a Whole Life Carbon assessment, as there is no substantial demolition within the Camden parts of the development, and the scale is not large enough to be required by the London Plan. However, an assessment has been provided and considered. It is noted that despite the development retaining a majority of the existing development, it fails to meet the retail benchmarks as shown in Table 1 above for the high scenario. The medium scenario would improve on this, but would still only meet the benchmark for the embodied carbon due to the reuse of the tunnel structure. The in use carbon is significantly above the benchmarks for all scenarios – mainly due to the impact of the mechanical, electrical, and plumbing services. It is recommended that the applicant continues to reassess and consider ways to reduce the whole life carbon impact of the scheme and provides an updated report of the actual scenario pre implementation, and is encouraged to aim to at least meet the GLA Benchmarks. A condition is recommended that would secure a post-construction assessment of Whole Life Carbon to be completed and provided for monitoring and compliance (condition 14).

**Energy and carbon reductions**

13.17. To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy

SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. 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). The final step is to monitor, verify, and report on energy performance (be seen).

13.18. After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

Energy and carbon summary

13.19. The following summary table shows how the proposal performs against the policy targets for operational carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

13.20. It should be noted that the below table only considers the ‘regulated’ carbon considered within building regulations, so will include the energy used for heating, cooling, lighting, and hot water – but will not include the ‘unregulated’ energy for the screens and exhibitions themselves. The applicant has presented energy information in three potential scenarios of energy – low, medium, and high. Due to the large amounts of screens which will potentially create large amounts of heat, the high scenario would include significantly higher regulated energy for cooling. The Energy Strategy provides carbon calculations against Part L for the mid scenario only, as the calculations and result is underpinned by the Notional Calculation Method and it is not possible to change the internal gains and usage profiles.

<b>Policy requirement (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Be lean stage (low demand): LP policy SI2	15%	0.3 %
Be green stage (renewables): CLP policy CC1	20%	41.2 %
Total carbon reduction: LP policy SI2 and LP CC1	35%	41.4 %

*Table 3: Carbon saving targets and the site wide scheme results.*

<b>Policy requirement (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Be lean stage (low demand): LP policy SI2	15%	1.6 %
Be green stage (renewables): CLP policy CC1	20%	56.1 %
Total carbon reduction: LP policy SI2 and LP CC1	35%	56.8 %

*Table 4: Carbon saving targets and the 31-33 High Holborn (Fulwood Place) scheme results.*

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	0.4 %
Be green stage (renewables): CLP policy CC1	20%	43%
Total carbon reduction: LP policy SI2 and LP CC1	35%	43.2%

*Table 5: Carbon saving targets and the Kingsway Tunnels scheme results.*

13.21. The operational carbon savings and measures set out below will be secured under an **Energy and Sustainability Strategy secured by Section 106 legal agreement** which includes monitoring, in compliance with the development plan.

Be lean stage (reduce energy demand)

13.22. London Plan policy SI 2 sets a policy target of at least a 15% (non-residential) reduction through reduced energy demand at the first stage of the energy hierarchy.

13.23. In this case, the development does not meet the policy target of 15% (non-residential), reducing emissions by only 0.3 % at this stage through energy efficient design. However, it must be taken into account that this is a unique site with significant elements existing underground which will provide a high level of thermal efficiency. Due to the proposed use expecting to attract over 2 million visitors per year and the potential inclusion of screens which will produce heat that will need to be removed, there is a high cooling element expected which has the result of impacting on the Be Lean savings. The High Holborn building is expected to save 1.6% at Be Lean and will include only replacement of glazing and draught proofing as there are limited opportunities for other improvements. The Tunnels will only save 0.4% but will use high efficiency lighting throughout and the domestic hot water system uses a step-up heat pump system linked to the cooling, so a high percentage of the water heating is provided from heat recovery.

Be clean stage (decentralised energy supply)

13.24. London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible, establishing a new network.

13.25. In this case an assessment of the existing London heat map has been made and there is potential for exporting waste heat from the cooling from the site. Contact has been made with the Citigen network in the CoL area and further investigations have been initiated into the potential for opportunities to export the heat to neighbouring buildings including potential opportunities in Camden. The connection should be future proofed with pipes to the boundary of the development from the plant area to enable easy connection. A condition is recommended that would require future connections to be fully investigated and connection safeguarded (condition 15), as well as a condition to provide a feasibility study investigating potential connections to a heat network (condition 16).

#### Be green stage (renewables)

13.26. Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO<sub>2</sub> emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.

13.27. In this case, the development exceeds the policy target of 20%, reducing emissions by 41% site wide, 56% for the High Holborn part of the site, and 43% within the Tunnels at this stage through renewables, in compliance with the development plan. The proposal includes heat pumps but PV is not possible in the Camden part of the development.

#### Total carbon reductions

13.28. Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.

13.29. This is charged at £95/tonne CO<sub>2</sub>/yr (over a 30-year period) which is 43.5 tonnes x £95 x 30 years = £123,975 for the whole development across both Camden and the City of London. This amount will be spent on delivery of carbon reduction measures in the boroughs.

13.30. In this case, the development meets the policy target of 35% reductions, achieving an overall on-site reduction of 41.4% below Part L requirements as shown in Table 3 above. Camden's share of the carbon offset of £123,975 will be secured by Section 106 legal agreement to bring it to zero carbon, in compliance with the development plan.

Be seen (energy monitoring)

- 13.31. The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development completed the planning stage requirements for the Be Seen GLA spreadsheet and confirmed target dates for subsequent submissions.
- 13.32. The **Energy and Sustainability Strategy secured by Section 106 legal agreement** will secure reporting to the GLA in line with their published guidance.

***Climate change adaption and sustainable design***

- 13.33. 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 initial Pre Assessment submitted overall score of 67.1% did not meet the 70% required for BREEAM Excellent. The credits targeted for Water met the requirement of 60% with 77.8%, and for Materials met the requirement of 40% with 46%. However, the targeted Energy credits of 53.8% did not meet the 60% minimum.
- 13.34. The applicant has advised that a post planning BREEAM pre-assessment has been produced and has demonstrated that the scheme achieves a scoring of 70.03%, which just meets the Excellent rating – but this has not been submitted as part of the proposal. They also state that further studies will be undertaken to increase the compliance margin of the Excellent rating during detailed design stages. It is recommended that the legal agreement secures BREEAM Excellent with at least 60% for energy, 77% for water, and 46% for materials.
- 13.35. Due to the nature of the development not being possible to achieve natural ventilation and due to the internal heat gain, modelling shows that without both mechanical ventilation and active cooling, the development would overheat. Therefore, in this case active cooling is considered justified.
- 13.36. The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 13.37. In this case, the works to 31-33 High Holborn and the Fulwood Place section of the site are minor and only include alterations to the front façade and new intake louvres to the side (west) elevation and pressure relief louvres to the rear (north) elevation. The works do not increase the flood risk through any increase in the impermeable area, but it is not possible to incorporate sustainable drainage (SuDS) such as a blue/green roof or

attenuation tanks to reduce flood risk. The site is not located in a Local Flood Risk Zone or on a previously flooded street and therefore is not considered to be in an area at risk of flooding. There is a medium risk of surface water in the vicinity of the front of the property on High Holborn. As such a Flood Risk Emergency Plan will be required. Flood risk is covered further in the 'Flood risk and drainage' section of this report, in section 15.

## **14. AIR QUALITY**

- 14.1. Policy CC4 (Air quality) of the Local Plan seeks to ensure that the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. The policy is also supported by CPG 'Air quality'.
- 14.2. Development that involves significant demolition, construction, or earthworks will also be required to assess the risk of dust and emissions impacts in an air quality assessment, including appropriate mitigation measures to be secured in a Construction Management Plan. An air quality assessment has been provided in support of the application, and it should be noted that, although much of this relates to the demolition and construction within the boundaries of the City of London, an assessment would be required in line with Camden's policies due to the site location and nature of the work involving substantial refurbishment and change of use.
- 14.3. The proposed development is located on High Holborn, which is a busy road and noted to be an area of poor air quality.
- 14.4. The proposed development will be car-free and is heated with air source heat pumps, so heating and cooling would be non-combustion and all electric. This is particularly welcome in an area of poor air quality, such as the area that the application site is within. The development is considered to be Air Quality neutral.
- 14.5. The proposal involves the installation of a 550kVA emergency generator, which are generally discouraged due to air quality concerns. Where such equipment is proposed, it would need to be justified in terms of size (appropriate for life safety functions only unless clearly justified for other reasons), consideration of alternative technologies to diesel (e.g. UPS), and demonstration of minimisation of testing. In order to alleviate these concerns, a condition has been recommended that would secure further details of any proposed generator prior to installation (condition 18).

- 14.6. Due to the nature of the subterranean tunnels, concern has been raised by officers regarding the location of ventilation intakes and specifically whether pollutant levels at these points would be acceptable. Similarly, the underground tunnels that host the attraction may suffer from elevated levels of particulate pollution which could potentially be harmful to human health. The area itself is also highly sensitive to dust emissions, and it is noted that the construction phase will create a high magnitude of impact – therefore, four air quality monitoring locations would need to be agreed.
- 14.7. In order to mitigate the risk of the aforementioned concerns, conditions have been recommended that would secure an indoor air quality report covering the air pollution environment within the deep level tunnels (condition 19), air quality monitoring of the construction related impacts (condition 17), restriction on the use of any non-road mobile machinery unless compliant with NRMM Low Emission Zone requirements and registered for use on the NRMM register (condition 20), and details of mechanical ventilation (condition 21).
- 14.8. Subject to the above conditions, the proposed development would accord with Policy CC4 of the London Borough of Camden Local Plan, and would therefore be acceptable in terms of air quality.

## **15. FLOOD RISK AND DRAINAGE**

- 15.1. Policy CC3 (Water and flooding) of the Local Plan seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. When considering development proposals, the Council will consider the impact of development in areas at risk of flooding, incorporate flood resilient measures in areas prone to flooding, and utilise Sustainable Drainage Systems where possible.
- 15.2. Policy SI 13 of the London Plan states that London is at particular risk from surface water flooding and that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Policy GG6 seeks to ensure that London becomes more efficient and resilient, and that development is designed to take account of a changing climate, including natural hazards like flooding.
- 15.3. According to the Environment Agency, the application site is located within Flood Zone 1; there are three flood zones as defined by the Environment Agency, with Flood Zone 1 being least likely to flood and Flood Zone 3 being most likely to flood. The site lies within an area of low risk of sewer flooding, very low risk of fluvial and tidal flooding, and low risk of groundwater flooding. The site's footprint generally consists of areas of very low risk of surface water flooding, with some areas at low to medium risk, including along High Holborn and in front of the property, where the



tunnels run under. However, public highways such as this can offer overland flow routes during exceedance storms events, and surface water maps do not account for the presence of existing drainage infrastructure that manage flows below ground. The only potential areas for surface water ingress would be at the two shaft sites at Fulwood Place and Furnival Street. Nonetheless, the subterranean nature of the tunnels means that appropriate measures are required to ensure that the risk of flooding is alleviated, particularly due to the potentially serious consequences of flooding to the tunnels.

15.4. A Flood Evacuation Plan was submitted over the course of the application, in addition to the Flood Risk Assessment and Outline Drainage Strategy. These demonstrate measures for flood risk mitigation, including:

- Routes for surface water ingress protected by comprehensive threshold drainage, finished floor levels rising a minimum of 500mm above adjacent street levels, or external ground levels that fall away from the proposed building thresholds;
- Where practicable, all electrical and life safety infrastructure is provided a minimum of 300mm above finished floor levels, or where not practicable, such equipment is designed to be flood resilient or protected by an appropriate drainage system; and
- Waterproofing measures deployed throughout the site to manage the risk of groundwater seepage and underfloor drainage and pumping systems to remove any residual seepage.

15.5. It is also proposed to introduce sustainable urban drainage systems to alleviate flood risk, including rainwater capture, blue roofs, and storage tanks. It is likely that sustainable urban drainage system components would be centred around the new construction at Furnival Street, located within the boundaries of City of London. The Fulwood Place section of the development only includes minor alterations to the facades, including changes to the glazing and installation of intake louvres and pressure relief louvres. As such, the works do not increase flood risk through any increase in the impermeable area, and it is not feasible to incorporate sustainable drainage such as a blue/green roof or attenuation tanks to reduce flood risk. Nonetheless, a condition is recommended to secure details of any sustainable urban drainage system components that may be installed (condition 22), alongside a condition to secure flood prevention measures (condition 23).

15.6. The Flood Evacuation Plan also sets out proposed egress and access routes, both internal and external that would be directed through unflooded areas. When reviewed alongside the outlined measures to mitigate flood risk secured by condition, it is considered that the information provided would ensure that the risk of flooding is acceptable. However, a condition

is recommended to secure the Flood Evacuation Plan prior to occupation of the site, so that it can be assessed again at a later point (condition 23).

- 15.7. On the basis of the above conditions, the proposed development would accord with Policy CC3 of the London Borough of Camden Local Plan, and would therefore be acceptable in terms of flood risk and drainage.

## **16. BASEMENT CONSIDERATIONS**

- 16.1. Policy A5 (Basements) of the Local Plan states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) neighbouring properties;
- b) the structural, ground, or water conditions of the area;
- c) the character and amenity of the area;
- d) the architectural character of the building; and
- e) the significance of the heritage assets.

- 16.2. The policy goes on to note that, in determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment (BIA) and, where appropriate, a Basement Construction Plan (BCP).

- 16.3. As part of the proposal, significant basement works are proposed at the Furnival Street section of the site, located within the boundaries of the City of London. However, the Fulwood Place section of the development, located at 31-33 High Holborn, only involves extremely limited excavation to slightly widen the diameter of an existing shaft present beneath the site, located approximately 27m below ground level. In order to demonstrate that the minor excavation works would be unlikely to result in any specific land or slope stability, groundwater, or surface water issues, the applicant has provided a Basement Impact Assessment that consists of an assessment of the geology and ground conditions, a basement screening assessment, a scoping exercise, a construction methodology, and consideration of the potential impacts identified by screening and scoping.

- 16.4. In line with Policy A5 of the Local Plan and CPG 'Basements', the submitted Basement Impact Assessment has been independently verified to ensure compliance with Camden guidance by Campbell Reith.

- 16.5. Following review of the Basement Impact Assessment, Campbell Reith have issued a final audit report that concludes that the BIA complies with the requirements of CPG 'Basements'. The proposed works to the shaft at Fulwood Place are confirmed to comprise of the extension of an existing shaft by approximately 6m, with the base of the existing shaft being 27m below ground level. Due to the depth of the proposed excavations, it is accepted that the development will not impact the hydrogeology of the area, the hydrology of the area, and that differential surface movement will be less than 1/1000, which will result in 'negligible' damage to neighbouring properties (Burland Category 0).
- 16.6. Details of the appointed engineer to oversee the basement works will need to be approved by the Council to ensure suitable qualifications (condition 24), and a condition is also recommended to ensure that the basement works are undertaken in accordance with the Basement Impact Assessment and the Campbell Reith Audit Report (condition 25). With these conditions, officers are satisfied that the proposed development meets the requirements of Policy A5 of the London Borough of Camden Local Plan.

## **17. CONTAMINATED LAND**

- 17.1. Policy A1 (Managing the impact of development) of the Local Plan seeks to protect the amenity of residents of the borough by ensuring consideration is given to contamination of land when assessing development proposals. The reason for this is that development on contaminated land can expose people to a wide range of health risks, so it is necessary to assess that risk and to secure remediation as appropriate. Without proper management of risks and appropriate remediation, disturbing the land could release contaminants into the local environment, impacting on local environment and those who occupy or visit the land – both during and following excavation and construction.
- 17.2. Evidence of certain historical uses on and around the site mean that there may be potential risks of land contamination. Notably, this includes records of high explosive bombs that have previously fallen on the area surrounding the site, meaning the risk from unexploded ordnance (UXO) is considered to be high. The applicant has provided a contaminated land preliminary risk assessment with the submission, which specifically investigates the potential risks at the Fulwood Place section of the site.
- 17.3. The investigations revealed that risk to future site users and third party neighbours from contamination is considered to be low, however the risk to construction and maintenance workers from contamination is considered to be low to moderate – though it is noted that this risk can be managed with health and safety protocols. The risk from ground gas has been assessed as low, based on the assumption that the buildings and

below ground structures will be subject to appropriate ventilation and waterproofing, the risk to groundwater bodies underlying the site from contamination has been assessed as low, and the risk to underground structures and services is considered to be low to moderate.

- 17.4. The risk assessment recommends that a more intrusive investigation should be undertaken to identify any plausible contaminant linkages and any remedial measures that may be required. It is also suggested that a piling risk assessment should be undertaken to assess the risk to the aquifers underlying the site from piling activities – however there is no piling proposed as part of the development on the Camden side of the boundary divide. The need to give consideration to detailed UXO risk assessment and mitigation prior to intrusive works at the site is also noted, as well as further radon monitoring and assessment, given the provision of occupied below ground spaces within basements, shafts, and tunnels.
- 17.5. The submitted report has been reviewed by the Council's Contaminated Land Officer, who has confirmed that they have no objections to the proposal in principle, but noted the recommendations made in the report. The officer has therefore recommended that more detailed phased investigation and assessment is secured by condition, which is therefore recommended (condition 30). This condition would secure further investigation, as well as any remediation measures that would come forward as a result.
- 17.6. Given the above, the proposal is acceptable and in compliance with the Council's policies in terms of contaminated land, subject to conditions securing a written programme of ground investigation and remediation measures.

## **18. ECONOMY AND EMPLOYMENT**

- 18.1. Policies E1 (Economic development) and E2 (Employment premises and sites) of the Local Plan are aimed at securing a successful and inclusive economy in Camden by supporting employment generating uses, including leisure and tourism. The Council's policies state that employment and training opportunities for local residents and opportunities for businesses based in the borough to secure contracts to provide goods and services will be sought for developments such as this.
- 18.2. Although there is no uplift in floorspace within the boundaries of Camden, the size of the development in terms of build cost would trigger the requirement for apprenticeships, given the scheme would exceed £3 million. The applicant is required to recruit one construction apprentice paid at least London Living Wage for each £3 million of build costs, with a support fee of £1,700 paid to the Council for each apprentice, as per section 63 of the CPG 'Employment sites and business premises'.

- 18.3. The applicant has confirmed that the build cost of the development is expected to be approximately £87.8 million. Given the split in floor area across the two local authorities is approximately 70:30, with Camden's floor area the latter, the applicant would be required to recruit 9 construction apprentices, as well as pay the Council a total support fee of £15,300. The requirement to recruit these apprentices would be secured as an obligation as part of the legal agreement.
- 18.4. The Council's standard local recruitment target is 20%, and the applicant is expected to meet this. It is also required for the applicant to work with the Euston Skills Centre to recruit vacancies, advertising for no less than a week before the roles are advertised more widely. It is suggested in the socio-economic statement that there are recruitment opportunities during the construction phase.
- 18.5. The applicant would also be required to sign up to the Camden Local Procurement Code, as per section 61 of CPG 'Employment sites and business premises'. The Council's local procurement code sets a target of 10% of the total value of the construction contract, so it would be expected that the development fulfils this. The submitted documents suggest that the applicant is willing to work with and support the local area, so this would provide an opportunity to do so. The Council expects the developer or their contractor to be proactive in their own research on procurement or supplies within the borough, however the Council's inclusive economy team would be able to liaise with and assist when the proposal is implemented.
- 18.6. In terms of employment in the completed development, the applicant would be expected to commit to ensuring that the site offers local employment benefits in the long term. The submitted Socio-Economic assessment states that the applicant is committed to providing employment and skills opportunities for local residents, and in line with this, the Council would look to secure an appropriate number of end use apprenticeships, as well as work experience placements through the new attraction.
- 18.7. Additionally, the applicant would be expected to work with Camden Learning and Camden Science, Technology, Engineering, Arts, and Mathematics (STEAM) on school engagement. The applicant has demonstrated a commitment to offering free tickets to all primary school children in Camden and the City of London, which would present a good opportunity to work with Camden Learning and STEAM on history lessons and field work related to the heritage aspects of the attraction.
- 18.8. With regards to recruitment, the applicant has stated that their aim is to recruit locally for jobs within the development. The submitted documents already state that it is expected that the proposed development will result

in 105 jobs, equivalent to 85 full time equivalent roles. This is greatly supported, and the Council would request that the applicant joins the Council's Inclusive Business Network, and commits to working with Good Work Camden and the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, potentially through supported employment initiatives.

- 18.9. Additional support to the local community through measures such as discounted tickets for special groups including old age pensioners, students, and those on universal/pension credit, is noted in the Socio-Economic assessment. This would ensure greater accessibility and inclusivity, and would be supported, so this commitment is therefore secured by legal agreement.
- 18.10. The submitted Cultural Plan also refers to the creation of a figurative 'Lab', that would constitute a partnership project involving universities, tech-institutions, creative communities, and other local and London-wide communities to support generating and providing content in the cultural spaces. This could provide the opportunity for the exhibition spaces to be used in conjunction with important events throughout the year, such as LGBTQ History Month, Black History Month, and International Women's Day. The Council would look to secure this commitment to work with community groups as an obligation to ensure that the opportunities for inclusive development are utilised.
- 18.11. It is considered that many of the above commitments and provisions could be secured as part of one Employment and Training Plan. This would specifically include the commitment to work with Camden Learning, STEAM, Good Work Camden, and the Council's Inclusive Economy service, joining the Inclusive Business Network, and providing opportunities to work with local community groups and schools.
- 18.12. As noted earlier in this section, the Socio-Economic assessment sets out a commitment to provide free school trips for all primary schools in both the City of London and the London Borough of Camden to the proposed development. Given the learning opportunity that the proposed historic attraction could provide (as well as any potential wider cultural opportunities through the temporary exhibits or otherwise), this would be strongly supported by the Council. The document specifically notes the possibility of providing two class trips per week, which is the estimated figure that would allow for all primary school students within the two local authorities to visit the tunnels. This commitment would be sought to be included in the Employment and Training Plan.
- 18.13. The proposed development would be considered acceptable in terms of contributing to the success of Camden's economy, subject to the securing

of the above commitments that have been set out in this section of the report. To this end, the obligations would consist of the following:

- Commitment to recruitment of 9 construction apprentices and total payment of support fee of £15,300;
- Commitment to minimum of 20% local recruitment;
- Commitment to sign up to the Camden Local Procurement Code
- Employment and Training Package (including the commitments detailed in this report and the submitted documents).

18.14. Provided that the above contributions and commitments are secured, the proposal would be considered to be acceptable in terms of economic development and inclusive economy, and would comply with Policies E1, E2, and E3 of the London Borough of Camden Local Plan.

## **19. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

19.1. The Community Infrastructure Levy (CIL) applies to all proposals which add 100m<sup>2</sup> of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m<sup>2</sup>) multiplied by the rate in the CIL charging schedule. Camden collects two types of Community Infrastructure Levy: Mayoral CIL and Camden CIL.

### ***Mayoral CIL***

19.2. The proposal will be liable for the Mayor of London's CIL, which 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 land payment, and subject to indexation in line with the construction costs index. The contributions would be calculated following the grant of permission, with final amounts to be provided in demand notices.

### ***Camden CIL***

19.3. The proposal would also be liable for the Camden CIL. Again, the contributions would be calculated following the grant of permission, and final amounts would be provided in demand notices.

## **20. CONCLUSION**

20.1. In conclusion, the proposal would be considered acceptable and appropriate with regards to all material considerations. The proposed use would be acceptable for the area and would be considered to contribute to the viability and vitality of both the Central London Area and the Central Activities Zone, and would be bring a currently vacant site into use. The development would involve very limited external alterations, and neither these nor the change of use would be considered to cause harm to the character and appearance of the Bloomsbury Conservation Area, nor the

site itself. Subject to the conditions and obligations secured by legal agreement, the proposed development would operate without harmful disturbance to neighbours or transport infrastructure, and would deliver public benefits through contributions. The development would minimise carbon use on-site, and achieves a total carbon reduction that meets policy targets. Both the construction and operation phase would bring economic support for the local area and borough more widely, contributing to the economy of both. Taking account of the policies of the development plan and all material planning considerations, the proposal would deliver significant economic and cultural benefits, as detailed below.

***Public benefits***

20.2. No harm has been identified to heritage assets but if the committee decides there is harm, there are a number of public benefits that could weigh against that harm.

- Support for the growth of a designated Camden centre through the creation of a new tourist attraction.
- Economic benefits of increasing footfall in an area of the borough that has been negatively impacted by the covid pandemic.
- Bringing new jobs and investment to the borough, alongside securing an Employment and Training package that includes apprenticeships, local employment, and local procurement.
- The cultural benefits of a new visitor attraction, including to schools and groups that would be provided with discounts or free entry.
- Transport package including contributions towards Council priorities such as pedestrian, cycling, and environmental improvements and micromobility.

**21. RECOMMENDATION**

21.1. Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- Operational Management Plan (OMP) with review mechanism
- Car free development
- Construction Management Plan (CMP) and CMP implementation support contribution of £30,513 and CMP impact bond of £32,000
- Travel Plan and associated monitoring and measures contribution of £11,348
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000
- Delivery and Servicing Plan
- Highways works contribution of £20,000
- Off-site cycle parking contribution for cycle parking stands of £4,800



- Pedestrian, Cycling, and Environmental Improvements contribution of £150,000
- Micromobility Improvements contribution of £10,000
- Restriction on coach bookings and picking up/dropping off customers by coach outside site's entrance at 31-33 High Holborn.
- Requirement to form a construction working group consisting of representatives from the local community
- Carbon offset payment – estimated £123,951
- Energy and Sustainability Strategy
- BREEAM Excellent (at least 60% for energy, 77% for water, and 46% for materials)
- Measures to ensure future connection to a local energy network
- Construction apprenticeships paid London Living Wage (9 in total) and support fee of £1,700 per apprentice (£15,300)
- Local Procurement Strategy (including Camden Local Procurement Code)
- Employment and Training Plan (including work experience placements, 20% local recruitment target, and engaging with Camden schemes)

21.2. The Heads of Terms secured by the City are mostly in alignment with the above Heads of Terms sought by Camden, however there are inevitably some differences due to the respective Local Plans, context of the parts of the development falling on different sides of the Borough boundary, and separate assessments of the proposal. As such, some obligations are sought by one authority and not the other, such as the Employment and Training Plan included in Camden's Heads of Terms, and the Access Management Plan included in the City's Heads of Terms.

21.3. The legal teams of the two boroughs will be in consultation with each other both during the drafting of the respective legal agreements and, where appropriate, in the process of discharging relevant obligations. For example, where Heads of Terms are only present in one of the legal agreements, the other borough will be consulted on where appropriate.

21.4. Consideration may also be given to the boroughs being a party to the other borough's legal agreement to acknowledge that, where relevant, the obligations are enforceable across the whole of the development site.

## **22. LEGAL COMMENTS**

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



**23. CONDITIONS**

1	<p><b>Three years from the date of this permission</b> This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p><b>Approved drawings</b> The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p>Existing Drawings: 01820-WEA-XX-ST-PD-A-0001 Rev 00; 01820-WEA-XX-ST-PD-A-0002 Rev 00; 01820-WEA-01-00-PD-A-0100 Rev 00; 01820-WEA-XX-ST-PD-A-0003 Rev 01; 01820-WEA-01-W-PD-A-2050 Rev 00; 01820-WEA-01-N-PD-A-2051 Rev 00; 01820-WEA-01-S-PD-A-2052 Rev 00; 01820-WEA-01-E-PD-A-2053 Rev 00; 01820-WEA-01-W-PD-A-2054 Rev 00; 01820-WEA-01-B1-PD-A-1049 Rev 00; 01820-WEA-01-00-PD-A-1050 Rev 00; 01820-WEA-01-01-PD-A-1051 Rev 00; 01820-WEA-01-02-PD-A-1052 Rev 00; 01820-WEA-01-02-PD-A-1053 Rev 00; 01820-WEA-01-03-PD-A-1054 Rev 01; 01820-WEA-01-03-PD-A-1055 Rev 01; 01820-WEA-01-05-PD-A-1056 Rev 01; 01820-WEA-02-N-PD-A-2150 Rev 00; 01820-WEA-02-S-PD-A-2151 Rev 00; 01820-WEA-02-E-PD-A-2152 Rev 00; 01820-WEA-02-W-PD-A-2153 Rev 00; 01820-WEA-02-B1-PD-A-1149 Rev 00; 01820-WEA-02-00-PD-A-1150 Rev 00; 01820-WEA-02-AA-PD-A-3250 Rev 00; 01820-WEA-03-M1-PD-A-0949 Rev 00; 01820-WEA-03-00-PD-A-0950 Rev 00; 01820-WEA-03-01-PD-A-0951 Rev 00; 01820-WEA-03-02-PD-A-0952 Rev 00; 01820-WEA-03-03-PD-A-0953 Rev 00; 01820-WEA-03-03-ZZ-A-0960 Rev 00; 01820-WEA-03-03-ZZ-A-0961 Rev 00; 01820-WEA-03-03-ZZ-A-0962 Rev 00.</p> <p>Demolition Drawings: 01820-WEA-01-RF-PD-A-0150 Rev 00; 01820-WEA-01-00-PD-A-0151 Rev 00; 01820-WEA-01-W-PD-A-0152 Rev 01; 01820-WEA-02-00-PD-A-0250 Rev 00; 01820-WEA-02-N-PD-A-0251 Rev 00; 01820-WEA-02-S-PD-A-0252 Rev 00; 01820-WEA-02-W-PD-A-0253 Rev 00; 01820-WEA-03-M1-PD-A-0349 Rev 00; 01820-WEA-03-00-PD-A-0350 Rev 00; 01820-WEA-03-01-PD-A-0351 Rev 00; 01820-WEA-03-02-PD-A-0352 Rev 00; 01820-WEA-03-02-PD-A-0353 Rev 00.</p> <p>Proposed Drawings: 01820-WEA-01-00-PD-A-0101 Rev 00; 01820-WEA-02-00-PD-A-0200 Rev 00; 01820-WEA-01-W-PD-A-2100 Rev 01; 01820-WEA-01-N-PD-A-2101 Rev 00; 01820-WEA-01-S-PD-A-2102 Rev 01; 01820-WEA-01-E-PD-A-2103 Rev 01; 01820-WEA-01-W-PD-A-2104 Rev 01; 01820-WEA-01-B3-PD-A-1097 Rev 00; 01820-WEA-01-B2-PD-A-1098 Rev 00; 01820-WEA-01-B1-PD-A-1099 Rev 02; 01820-WEA-01-00-PD-A-1100 Rev 04; 01820-WEA-01-01-PD-A-1101 Rev 00; 01820-WEA-01-02-PD-A-1102 Rev 01; 01820-WEA-01-03-PD-A-1103 Rev 00; 01820-WEA-01-04-PD-A-1104 Rev 00; 01820-WEA-01-05-PD-A-1105 Rev 00; 01820-WEA-01-RF-PD-A-1106 Rev 00; 01820-WEA-02-N-PD-A-2200 Rev 00; 01820-WEA-02-S-PD-A-2201 Rev 00; 01820-WEA-</p>

02-E-PD-A-2202 Rev 00; 01820-WEA-02-W-PD-A-2203 Rev 00; 01820-WEA-02-B1-PD-A-1199 Rev 00; 01820-WEA-02-00-DR-A-1200 Rev 00; 01820-WEA-01-ZZ-PD-A-3050 Rev 00; 01820-WEA-01-AA-PD-A-3100 Rev 01; 01820-WEA-01-BB-PD-A-3101 Rev 01; 01820-WEA-01-CC-PD-A-3102 Rev 01; 01820-WEA-01-AA-PD-A-3103 Rev 01; 01820-WEA-01-CC-PD-A-3105 Rev 00; 01820-WEA-01-CC-A-3107 Rev 01; 01820-WEA-02-AA-PD-A-3200 Rev 00; 01820-WEA-02-BB-PD-A-3201 Rev 00; 01820-WEA-02-AA-PD-A-3300 Rev 00; 01820-WEA-01-ZZ-A-4150 Rev 00; 01820-WEA-01-00-A-4151 Rev 02; 01820-WEA-01-ZZ-PD-A-5101 Rev 01; 01820-WEA-01-ZZ-PD-A-5102 Rev 01; 01820-WEA-01-ZZ-PD-A-5103 Rev 01; 01820-WEA-01-ZZ-PD-A-5104 Rev 01; 01820-WEA-01-ZZ-PD-A-5105 Rev 01; 01820-WEA-01-ZZ-PD-A-5106 Rev 00; 01820-WEA-01-ZZ-PD-A-5107 Rev 01; 01820-WEA-01-ZZ-PD-A-5108 Rev 01; 01820-WEA-03-M1-PD-A-0099 Rev 00; 01820-WEA-03-00-PD-A-1000 Rev 00; 01820-WEA-03-01-PD-A-1001 Rev 00; 01820-WEA-03-02-PD-A-1002 Rev 00; 01820-WEA-03-03-PD-A-1003 Rev 00; 01820-WEA-03-ZZ-PD-A-1010 Rev 01; 01820-WEA-03-ZZ-PD-A-1011 Rev 01; 01820-WEA-03-ZZ-PD-A-1012 Rev 01; 01820-WEA-03-ZZ-PD-A-1013 Rev 01.

**Documents:**

Air Quality Assessment (prepared by WSP, dated 30/11/2023); Archaeological Desk-Based Assessment (prepared by Mills Whipp, dated 29/11/2023); Basement Impact Assessment Audit (prepared by Campbell Reith, dated 13/06/2024); BREEAM Pre-Assessment Report (prepared by WSP, dated 30/11/2023); Contaminated Land Preliminary Risk Assessment (prepared by WSP, dated 30/11/2023); Delivery and Servicing Plan (prepared by WSP, dated 16/05/2024); Energy Statement and Overheating Assessment (prepared by WSP, dated 30/11/2023); Geotechnical Basement Impact Assessment (prepared by WSP, dated 30/11/2023); Geotechnical Basement Impact Assessment – Fulwood Place (prepared by WSP, dated 15/05/2024); Noise and Vibration Impact Assessment (prepared by WSP, dated 30/11/2023); Pre-Demolition & Retrofit Audit (prepared by WSP, dated 30/11/2023); Security Report (prepared by WSP, dated 30/11/2023); Structural Report (prepared by WSP, dated 30/11/2023); Sunlight & Daylight Assessment (prepared by GIA, dated 30/11/2023); Sustainability Assessment (prepared by WSP, dated 30/11/2023); Transport Assessment (prepared by WSP, dated 16/05/2024); Waste Management Plan (prepared by WSP, dated April 2024); Whole Life-Cycle Carbon Assessment (prepared by WSP, dated 30/11/2023).

Reason: For the avoidance of doubt and in the interest of proper planning.

3

**Land use**

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the entirety of the site, excluding the bar, shall only be used as a Visitor and Cultural Attraction (Use Class F1 (b)(c), including any ancillary spaces, and for no other purpose (including any other purpose with Class F).

	<p>Reason: To safeguard the amenity of the adjoining premises and the area generally and to promote the success and vibrancy of the centre in accordance with policies A1, A4, and TC2 of the London Borough of Camden Local Plan 2017.</p>
4	<p><b>Floor area</b></p> <p>The development shall provide (all figures GIA and excluding plant):  10,341 sqm of Visitor and Cultural Attraction (Class F1(b)(c))  284 sqm of Bar Use (Sui Generis)</p> <p>Reason: To ensure that the development is carried out in accordance with the approved plans and for the avoidance of doubt and in the interests of proper planning.</p>
5	<p><b>Operational hours – Tunnels</b></p> <p>The use of the Visitor and Cultural Attraction (Use Class F1(b)(c)) hereby permitted shall not operate other than within the hours of 10:00 and 20:00.</p> <p>Reason: To safeguard the amenity of the adjoining premises and the area generally in accordance with Policies A1, A4, TC2, and TC4 of the London Borough of Camden Local Plan 2017.</p>
6	<p><b>Operational hours – Bar</b></p> <p>The use of the bar (Sui Generis) hereby permitted shall not operate other than within the hours of 10:00 and 01:00.</p> <p>Reason: To safeguard the amenity of the adjoining premises and the area generally in accordance with Policies A1, A4, TC2, and TC4 of the London Borough of Camden Local Plan 2017.</p>
7	<p><b>Capacity – Tunnels</b></p> <p>The maximum occupancy of the Visitor and Cultural Attraction (F1(b)(c)) hereby approved shall not exceed 1,310 people (including visitors and staff) at any one time.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with Policies A1, A4, TC2, and TC4 of the London Borough of Camden Local Plan 2017.</p>
8	<p><b>Capacity – Bar</b></p> <p>The maximum occupancy of the bar (Sui Generis) hereby approved shall not exceed 160 people (including visitors and staff) at any one time.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with Policies A1, A4, TC2, and TC4 of the London Borough of Camden Local Plan 2017.</p>

<p>9</p>	<p><b>Details to be submitted</b></p> <p>Before the relevant part of the work is begun, 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:</p> <ul style="list-style-type: none"> <li>a) Plan, elevation, and section drawings including glazing panels of any alterations to the shopfront facing High Holborn at a scale of 1:10;</li> <li>b) Details including sections at 1:10 of all ventilation grilles, external doors, and louvres;</li> <li>c) Details of all works to the Fulwood Place entrance and passageway, including threshold details, lighting type and illumination, and materials.</li> </ul> <p>The relevant parts 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.</p> <p>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.</p>
<p>10</p>	<p><b>Details of lift</b></p> <p>Prior to implementation, details of the proposed lifts, including how they shall be able to accommodate mobility vehicles, shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and retained for the duration of the development.</p> <p>Reason: To ensure that the details would provide a safe and secure development in accordance with Policy C6 of the London Borough of Camden Local Plan 2017 and Policies D5 and D11 of the London Plan 2021.</p>
<p>11</p>	<p><b>Fire Statement</b></p> <p>Prior to occupation, a Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The development shall be carried out in accordance with the approved details.</p> <p>Reason: Above ground development must not commence before this condition is discharged to ensure every element of the development and construction provides a safe and secure development in accordance with Policy D11 of the London Plan 2021.</p>

12	<p><b>Wayfinding Strategy</b></p> <p>Prior to the occupation of the building, a Signage and Wayfinding Strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, cultural exhibition areas, and any other relevant facilities shall be submitted to and approved in writing by the local planning authority.</p> <p>Reason: In the interests of visual amenity and satisfactory pedestrian circulation of the site, in accordance with Policies C6, D1, D2, and T1 of the London Borough of Camden Local Plan 2017.</p>
13	<p><b>Reuse and recycling of demolition waste</b></p> <p>The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021</p>
14	<p><b>Whole Life Carbon – Post Construction Assessment</b></p> <p>Prior to the occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to <a href="mailto:ZeroCarbonPlanning@london.gov.uk">ZeroCarbonPlanning@london.gov.uk</a> and <a href="mailto:SustainabilityPlanning@camden.gov.uk">SustainabilityPlanning@camden.gov.uk</a>, along with any supporting evidence as per the guidance.</p> <p>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with policies CC1, CC2, CC3, and CC4 of the London Borough of Camden Local Plan 2017 and policies, SI1, SI2, SI3, SI4, SI5 and SI7 of the London Plan.</p>
15	<p><b>Heat Connection</b></p> <p>The development shall be designed to allow for connection into a district heating network if this becomes available during the lifetime of the development. This is to include a strategy with relevant plan drawings for: equipment, allocation of plant space, and a protected route for connection in and out of the site. This is in addition to the requirement to find a beneficial use for the waste heat produced through the development's operations.</p> <p>Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with policies CC1, CC2, CC3, and CC4</p>

	of the London Borough of Camden Local Plan 2017 and policies, SI1, SI2, SI3, SI4, SI5 and SI7 of the London Plan.
16	<p><b>Waste heat provision feasibility study</b></p> <p>Prior to commencement, a detailed feasibility study of potential connection to a heat network or supply of waste heat to a neighbouring building should be submitted and approved in writing by the Local Planning Authority. Prior to occupation, evidence demonstrating that the approved measures have been implemented shall be submitted and approved in writing by the Local Planning Authority.</p> <p>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 Policies and London Plan Policy SI 3.</p>
17	<p><b>Air Quality – Monitoring</b></p> <p>Air quality monitoring should be implemented on site. No development shall take place until:</p> <ul style="list-style-type: none"> <li>a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA’s Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</li> <li>b) a confirmation email should be sent to <a href="mailto:airquality@camden.gov.uk">airquality@camden.gov.uk</a> no later than one day after the monitors have been installed with photographic evidence in line with the approved details.</li> <li>c) prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.</li> </ul> <p>The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.</p>
18	<p><b>Air Quality – Generator</b></p>



	<p>Prior to the installation of any generator, a report to show what alternatives have been considered shall be submitted to and approved in writing by the local planning authority. This report should include alternative such as a secondary electrical power supply, battery backup, or alternatively fuelled generators such as gas fired or hydrogen, as well as the details of the proposed generator. If it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available and shall be used solely on brief intermittent and exceptional occasions, such as where required in response to a life-threatening emergency and for the testing necessary to meet that purpose, and shall not be used at any other time.</p> <p>Reason: To manage and mitigate the impact of the development on the air quality and dust emissions in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policies A1, A4, and CC4 of the London Borough of Camden Local Plan 2017 and policy SI1 of the London Plan.</p>
19	<p><b>Air Quality – Indoor Air Quality Report</b></p> <p>Prior to occupation, an Indoor Air Quality report should be submitted to and approved in writing by the local planning authority. The report should detail the air pollution environment within the deep level tunnels and that the requirement to ensure suitable air quality is maintained for the proposed development.</p> <p>Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the London Borough of Camden Local Plan 2017 and policies GG3 and SI 1 of the London Plan.</p>
20	<p><b>No non-road mobile machinery</b></p> <p>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).</p> <p>Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the London Borough of Camden Local Plan 2017 and policies GG3 and SI 1 of the London Plan.</p>
21	<p><b>Mechanical Ventilation with NO2 and Particulate Filtration</b></p> <p>Prior to commencement of development excluding demolition and site preparation works, full details of the mechanical ventilation system including:</p> <ul style="list-style-type: none"> <li>a) air inlet locations. Air inlet locations should be located away from busy roads and any other emission sources and as close to roof level as possible, to protect internal air quality.</li> <li>b) appropriate NO2 and Particulate filtration system on the mechanical ventilation intake has been installed and a detailed mechanism to secure maintenance of this system shall be submitted to and approved by the local planning authority in writing.</li> </ul>

	<p>c) the development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.</p>
22	<p><b>Sustainable Urban Drainage System</b></p> <p>Prior to commencement of development, full details of any sustainable urban drainage system shall be submitted to and approved in writing by the local planning authority. Such system shall be based on details set out within the Flood Risk Assessment hereby approved. The details shall include a lifetime maintenance plan. The system shall be implemented as part of the development and thereafter retained and maintained for the duration of the development.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with Policies CC1, CC2, and CC3 of the London Borough of Camden Local Plan 2017.</p>
23	<p><b>Flood Risk / Prevention Measures</b></p> <p>Prior to commencement, flood risk should be minimised through flood protection measures and a Flood Risk Emergency Plan in accordance with the aims and objectives of the ADEPT/Environment Agency Flood Risk Emergency Plans for New Development guidance should be submitted to and approved in writing by the local planning authority.</p> <p>Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.</p>
24	<p><b>Basement Impact Assessment – Engineer</b></p> <p>The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, check for compliance with the design (as approved by the local planning authority and building control body) and monitor the critical elements of both permanent and temporary basement construction works throughout their duration. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.</p> <p>Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of Policies D1, D2, and A5 of the London Borough of Camden Local Plan 2017.</p>
25	<p><b>Basement Impact Assessment – Compliance</b></p>

	<p>The development shall not be carried out other than in strict accordance with the methodologies, recommendations and requirements of the Basement Impact Assessment (TLT-WSP-XX-XX-RP-CV-00005, dated 15/05/2024) and subsequent audit ('14006-77', dated 13/06/2024) hereby approved, and the confirmation at the detailed design stage that the damage impact assessment would be limited to Burland Category 0.</p> <p>Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1, D2, and A5 of the London Borough of Camden Local Plan 2017.</p>
26	<p><b>Lighting Strategy</b></p> <p>Prior to the commencement of the relevant works, a full Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the local planning authority, which should include full details of:</p> <ul style="list-style-type: none"> <li>a) all luminaires including decorative, functional, or ambient (including associated infrastructure);</li> <li>b) lighting layouts;</li> <li>c) a lighting control methodology;</li> <li>d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;</li> <li>e) all external, semi-external, and public-facing parts of the building and of any internal lighting in relation spaces and terraces so far that it creates visual or actual physical impact on the lit context to show how the façade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;</li> <li>f) the impact on the public realm, including typical illuminance levels, uniformity, colour appearance, and colour rendering.</li> </ul> <p>All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and Lighting Strategy thereafter.</p> <p>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.</p>
27	<p><b>Plant equipment details and mitigation</b></p> <p>Prior to commencement of the development, details shall be submitted to and approved in writing by the Council, of the external sound level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external sound level emitted from plant, machinery/ equipment will be lower than the lowest existing background sound level by at least 10dBA in order to prevent any adverse impact. The assessment shall be made in accordance with BS4142:2014+A1:2019</p>

	<p>“Methods for rating and assessing industrial and commercial sound.” at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. A post installation noise assessment shall be carried out where required to confirm compliance with the sound criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>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.</p>
28	<p><b>Anti-vibration measures</b></p> <p>Prior to commencement of the development, details of anti-vibration measures shall be submitted to and approved in writing by the Council. The measures shall ensure that [machinery, plant/ equipment] [extract/ ventilation system and ducting] are mounted with proprietary anti-vibration isolators and fan motors are vibration isolated from the casing and adequately silenced. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>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.</p>
29	<p><b>Odour abatement and extract system</b></p> <p>Prior to commencement of the use, details shall be submitted to and approved in writing by the Council, of the installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and vertical discharge outlet, in accordance with the ‘EMAQ+Control of Odour and Noise from Commercial Kitchen Exhaust Systems. Approved details shall be implemented prior to the commencement of the use and thereafter be permanently retained</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
30	<p><b>Contaminated land</b></p> <p>No development shall commence until the following:</p> <ul style="list-style-type: none"> <li>a) A site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority. The site investigation should assess all potential risks identified by the desktop study and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an</li> </ul>

	<p>assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>b) A remediation method statement (RMS) is submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>c) Following the completion of any remediation, a verification report demonstrating that the remediation as outlined in the RMS have been completed should be submitted to and approved in writing by the local planning authority. This report shall include (but may not be limited to): details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil and waste management documentation. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours, and other offsite receptors, in accordance with Policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
31	<p><b>Cycle parking</b></p> <p>Prior to the occupation of the building for the use hereby permitted, details of all long stay cycle parking and facilities linked to the cycle stores shall be submitted to and approved in writing by the local planning authority. The cycle parking shall thereafter be implemented in full in accordance with the approved details before the use hereby permitted commences and shall thereafter be retained solely for its designated use.</p> <p>Reason: To ensure adequate cycle parking is available on site, to promote sustainable modes of transport, and so safeguard the visual amenity of the area in accordance with policies A1 and T1 of the London Borough of Camden Local Plan 2017.</p>
32	<p><b>Heat pumps</b></p> <p>Prior to commencement of the relevant part of the development, details, drawings, and data sheets showing the location, Seasonal Performance Factor of at least 2.5 and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed to the buildings, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include a commitment to monitor performance of the system post construction. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by</p>

	<p>the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
<p>33</p>	<p><b>Transport for London Infrastructure Protection</b></p> <p>The development hereby permitted shall not commence until the following documents, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority, which:</p> <ul style="list-style-type: none"> <li>a) provide details on the use of scaffold/tall plant i.e cranes and lifting equipment;</li> <li>b) accommodate ground movement impact on all identified LU assets arising from the development construction. A Ground Movement Assessment (GMA) should be submitted to TfL IP for approval;</li> <li>c) mitigate the effects of noise and vibration arising from the adjoining operations within the railway structures and tunnels;</li> <li>d) no works to commence near or on the boundary with London Underground assets until any party wall agreements required with TfL Engineering, TfL Property or TfL Legal have been agreed and signed by all parties. As shown on Title No. LN170205, London Underground own the Fulwood Place Vent Shaft and other assets located at 31-33 High Holborn;</li> <li>e) demonstrate that the Fulwood Place Vent Shaft and its ancillary equipment/facilities will not be impacted by the development;</li> <li>f) demonstrate that no ventilation or exhaust gases are discharged into TfL / LUL assets or airspace;</li> <li>g) demonstrate that TfL access to the vent shaft from Fulwood Place is not impeded or altered.</li> </ul> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with Policy T3 of the London Plan 2021 and Policy T3 of the London Borough of Camden Local Plan 2017.</p>
<p>34</p>	<p><b>Historic England – Historic Building Recording</b></p> <p>Prior to commencement, a written scheme of historic building investigation (WSI) has been submitted to and approved by the local planning authority in writing. For buildings and structures that are included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and</p> <ul style="list-style-type: none"> <li>a) The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;</li> <li>b) The programme for post-investigation assessment and subsequent analysis, publication &amp; dissemination and deposition of resulting</li> </ul>

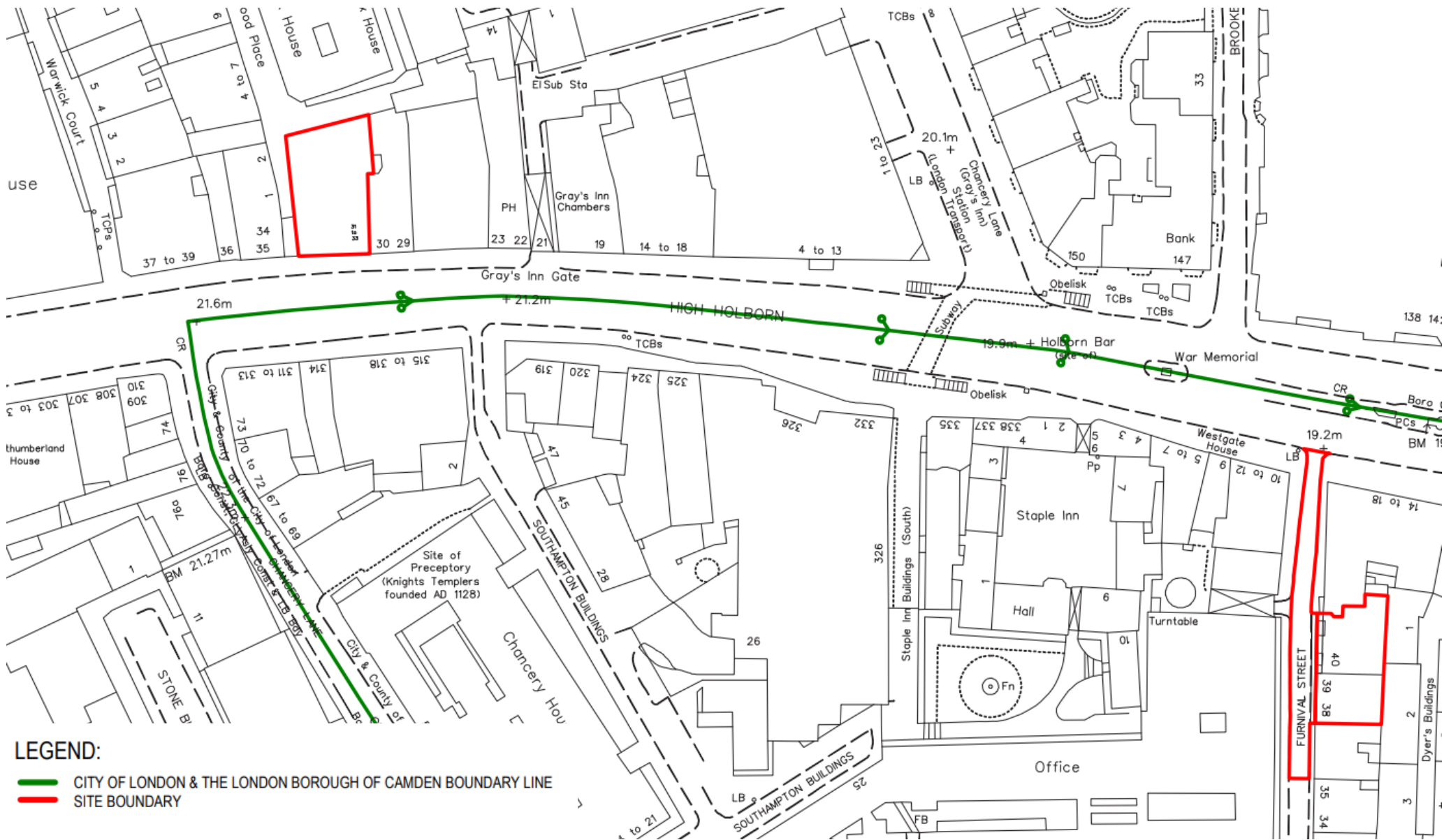
	<p>material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.</p> <p>Reason: In order to safeguard the significance of heritage assets within the borough in accordance with the requirements of Policies D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
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## 24. INFORMATIVES

1	<p>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).</p>
2	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at <a href="http://www.camden.gov.uk">www.camden.gov.uk</a>) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444).</p>
3	<p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
4	<p>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 &amp; Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
5	<p>The applicant is reminded that, should any further external alterations be required in the future, these would need to be the subject of a separate planning application. This includes any changes to the building's signage, which would require an advertisement consent application.</p>

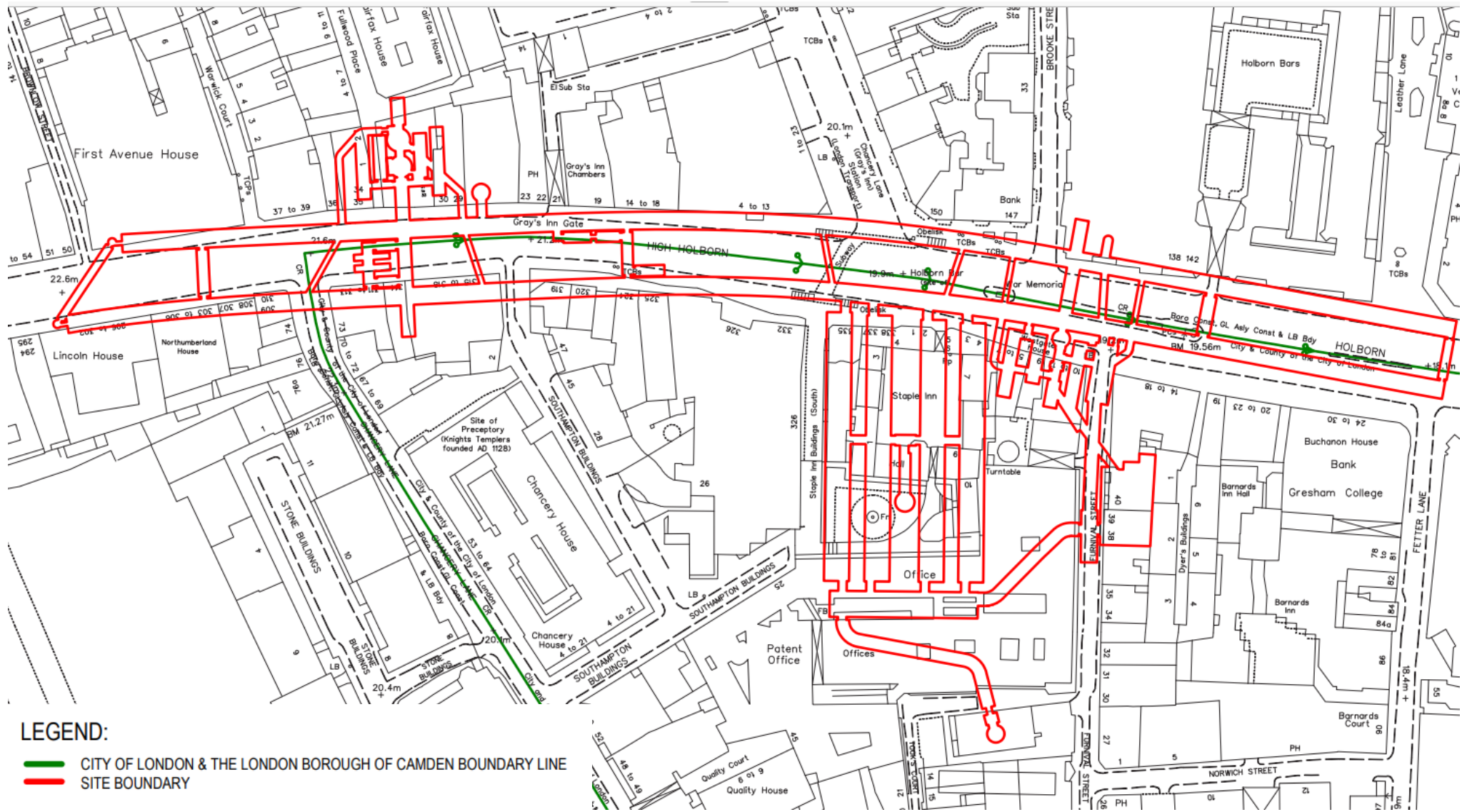
6	The Designing Out Crime Officer for the London Borough of Camden should be consulted with regards to guidance and advice on security, crime prevention, and safety at later post-permission stages of the scheme. They are able to be contacted at <a href="mailto:DOCOMailbox.NW@met.pnn.police.uk">DOCOMailbox.NW@met.pnn.police.uk</a> .
7	The Counter Terrorism Security Advisor for this area should be consulted with regards to guidance and advice on security, crime prevention, and safety at later post-permission stages of the scheme. They are able to be contacted at <a href="mailto:PSOMailbox-.CTSA@met.pnn.police.uk">PSOMailbox-.CTSA@met.pnn.police.uk</a> .
8	Transport for London should be consulted at detailed design stage, specifically with regards to any works impacting the public realm or involving wayfinding and signage.
9	The applicant is reminded that the London Fire Brigade should form a key stakeholder at detailed design stage, including the Qualitative Design Review process, fire precautions, and certification stages.
10	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.





**LEGEND:**

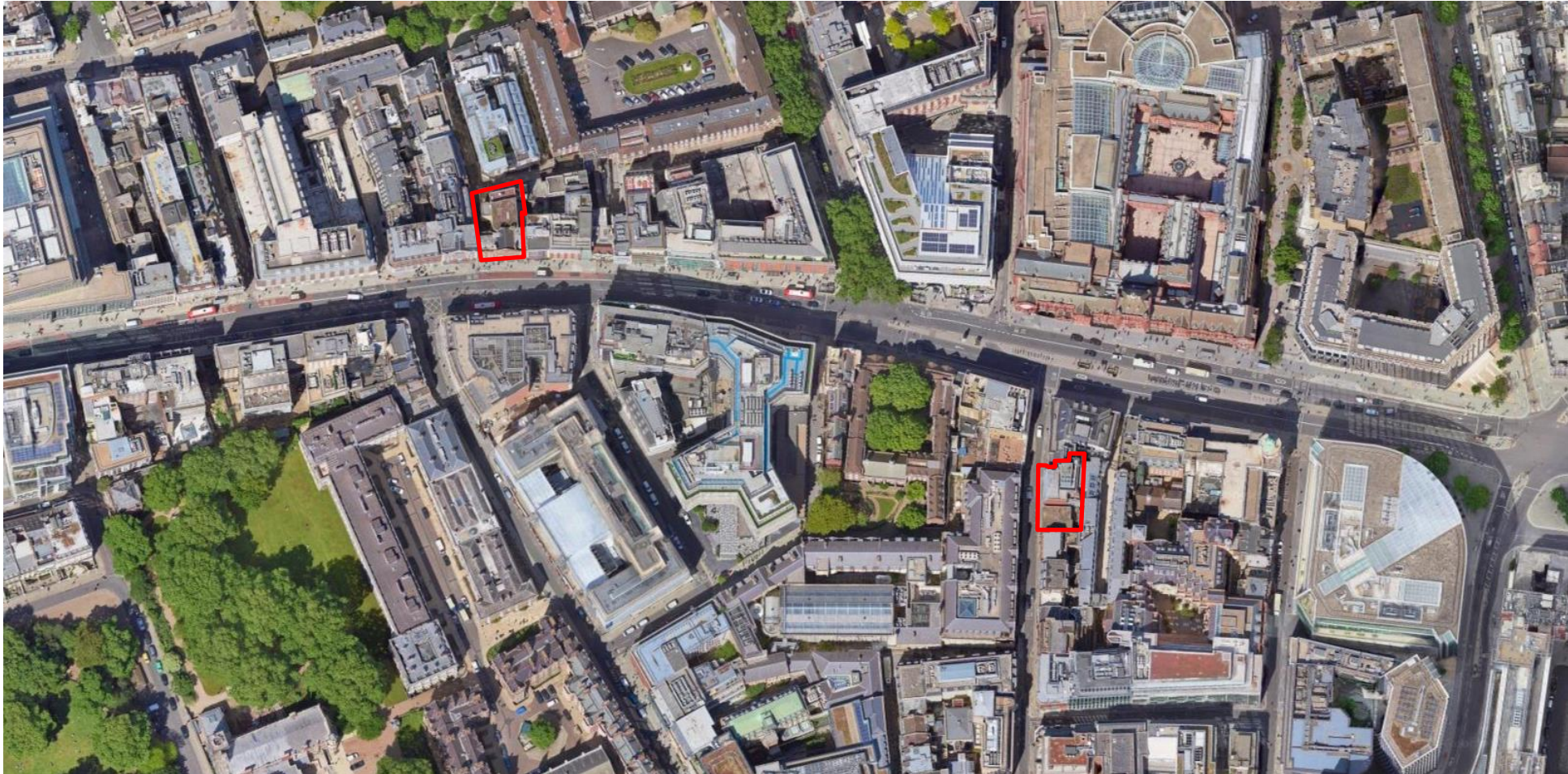
- CITY OF LONDON & THE LONDON BOROUGH OF CAMDEN BOUNDARY LINE
- SITE BOUNDARY



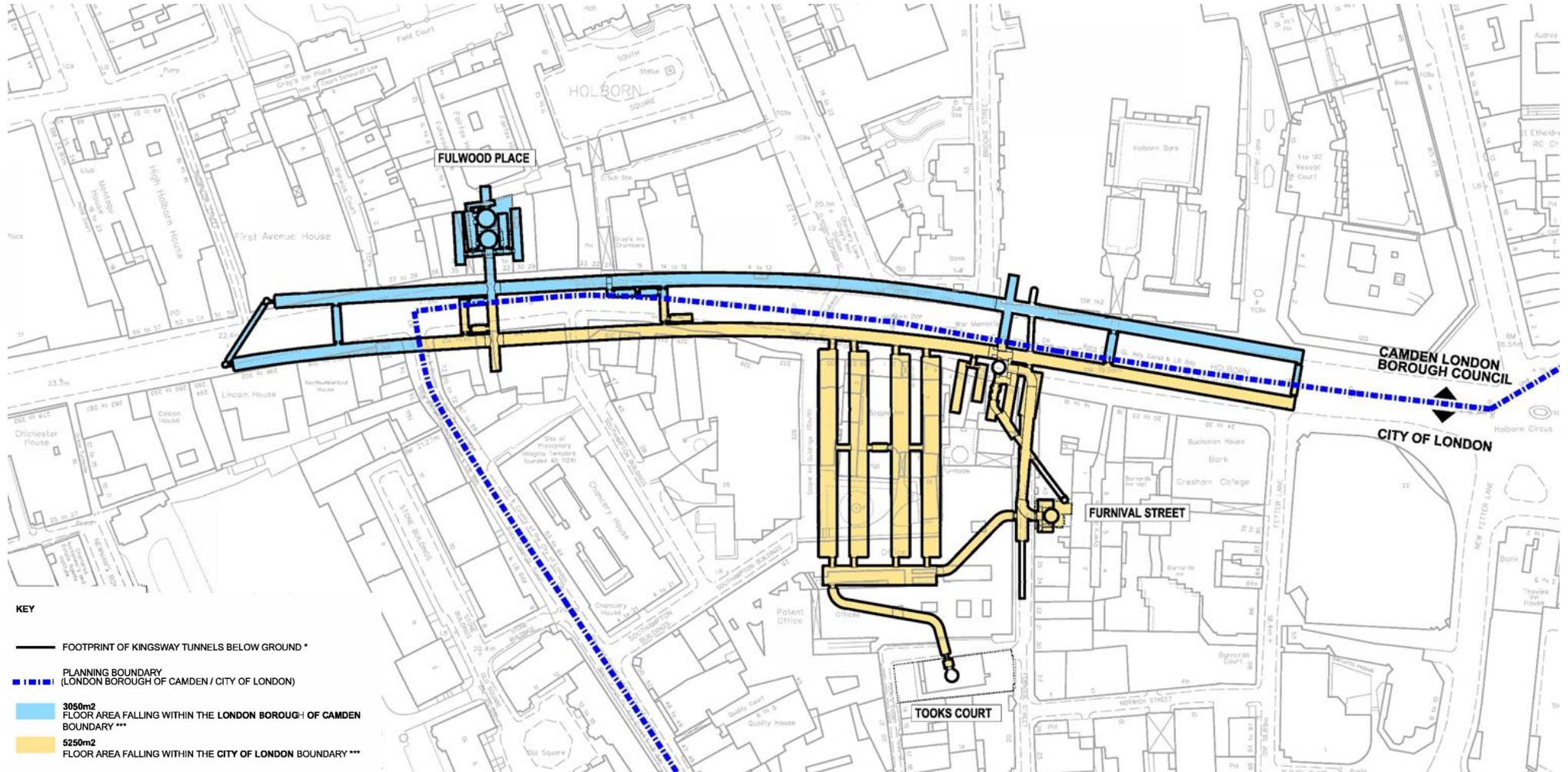
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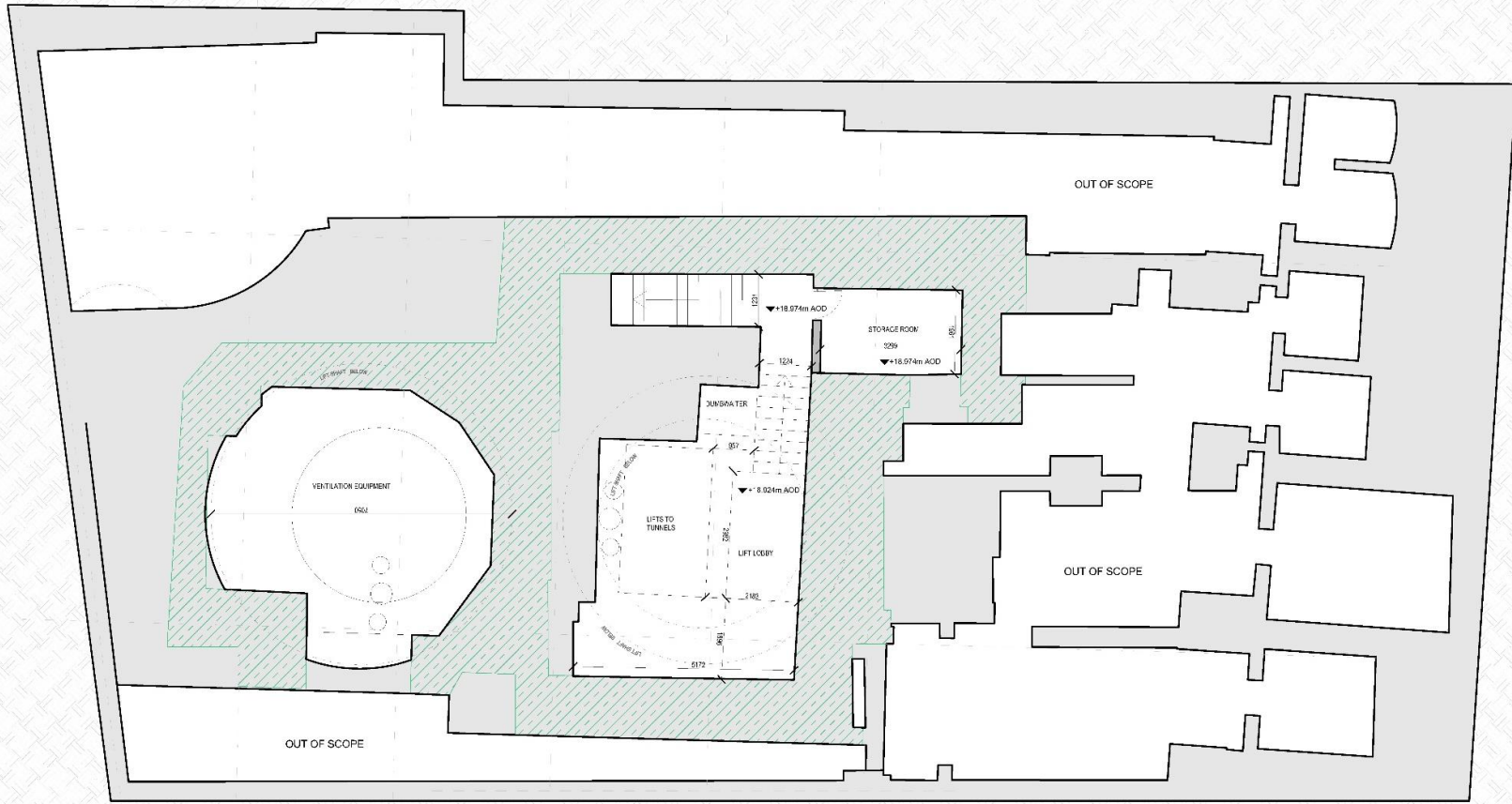


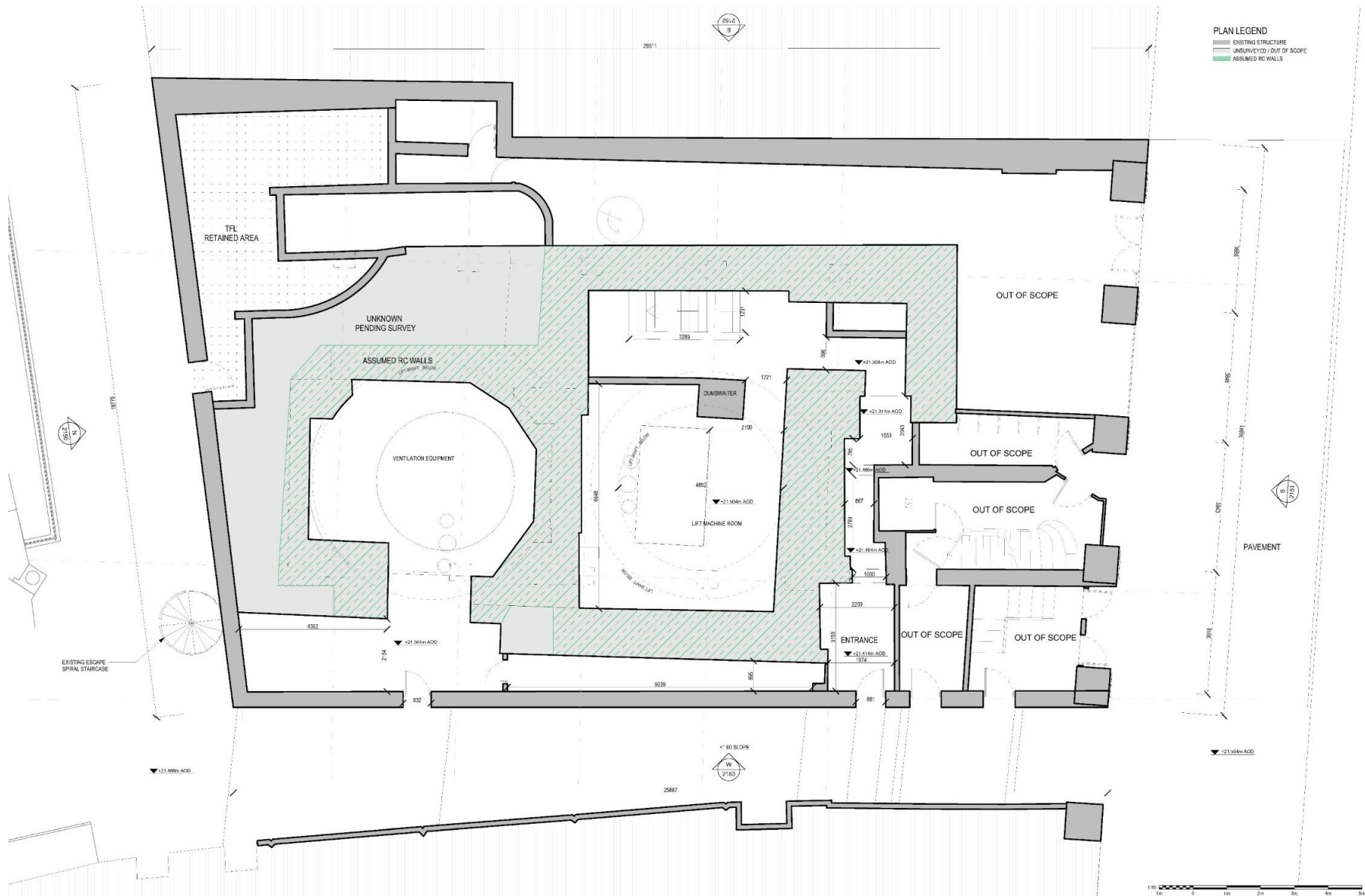




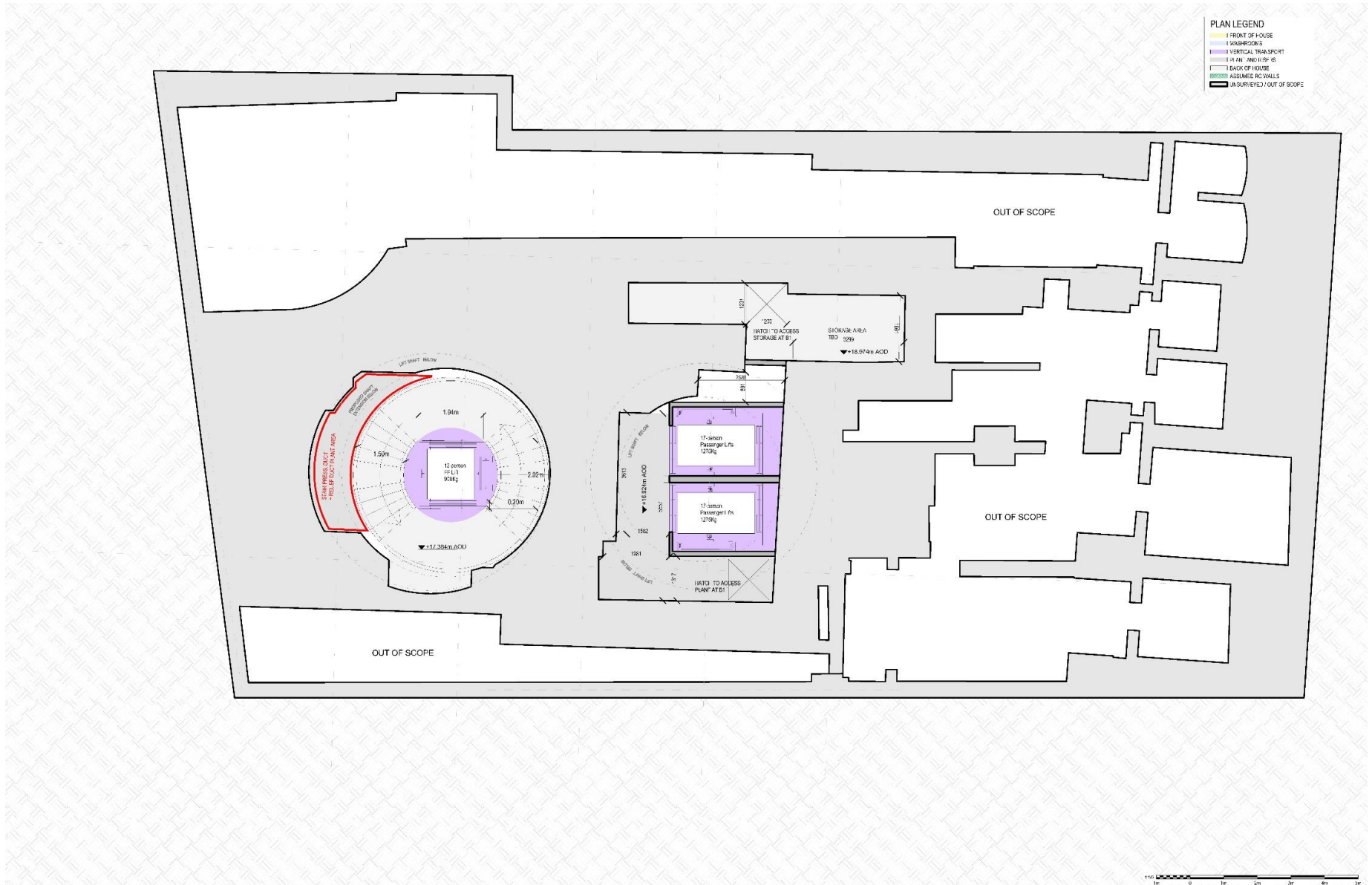


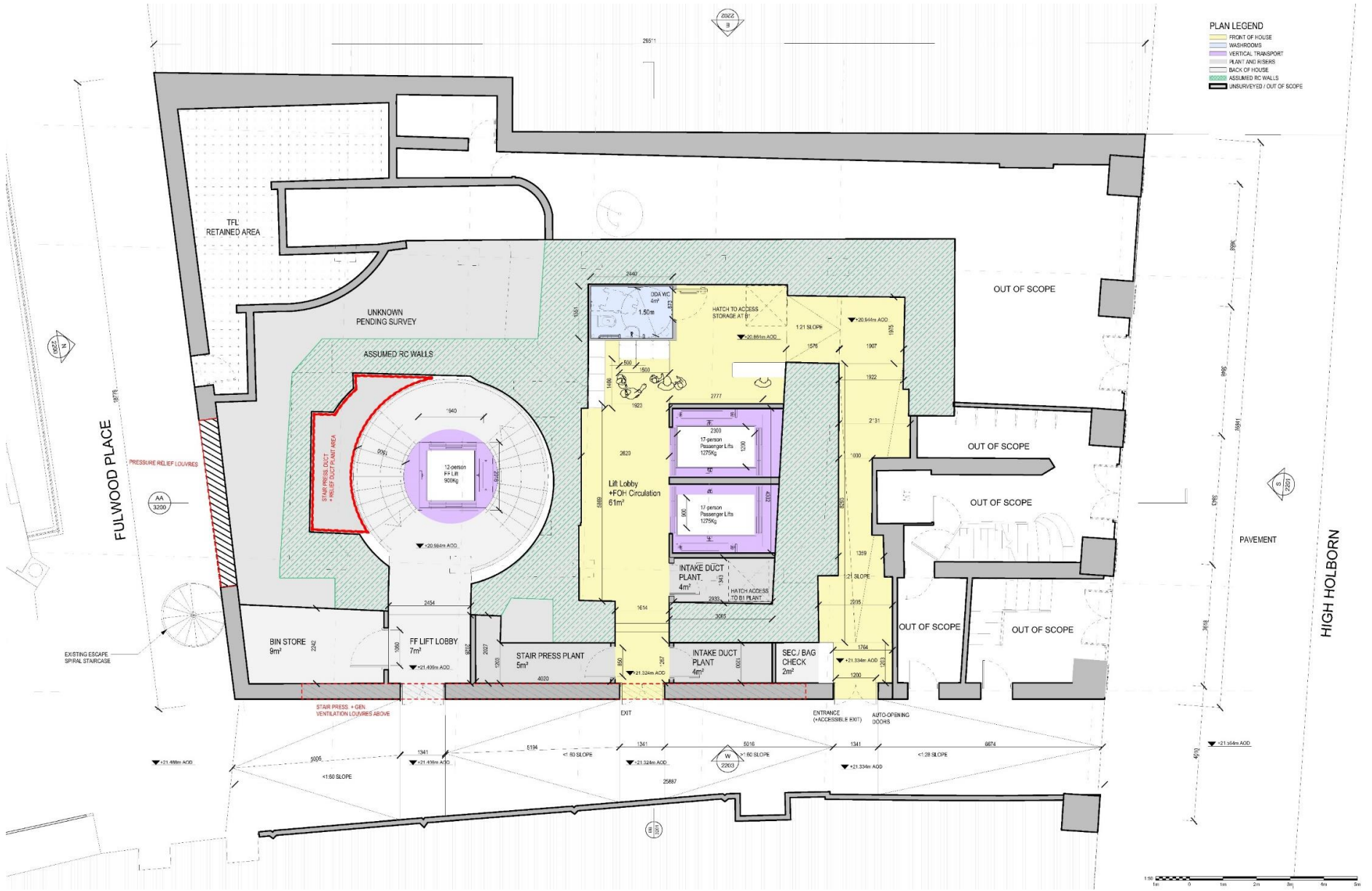
PLAN LEGEND  
EXISTING STRUCTURE  
UNASSIGNED / OUT OF SCOPE  
ASSUMED RW WALLS



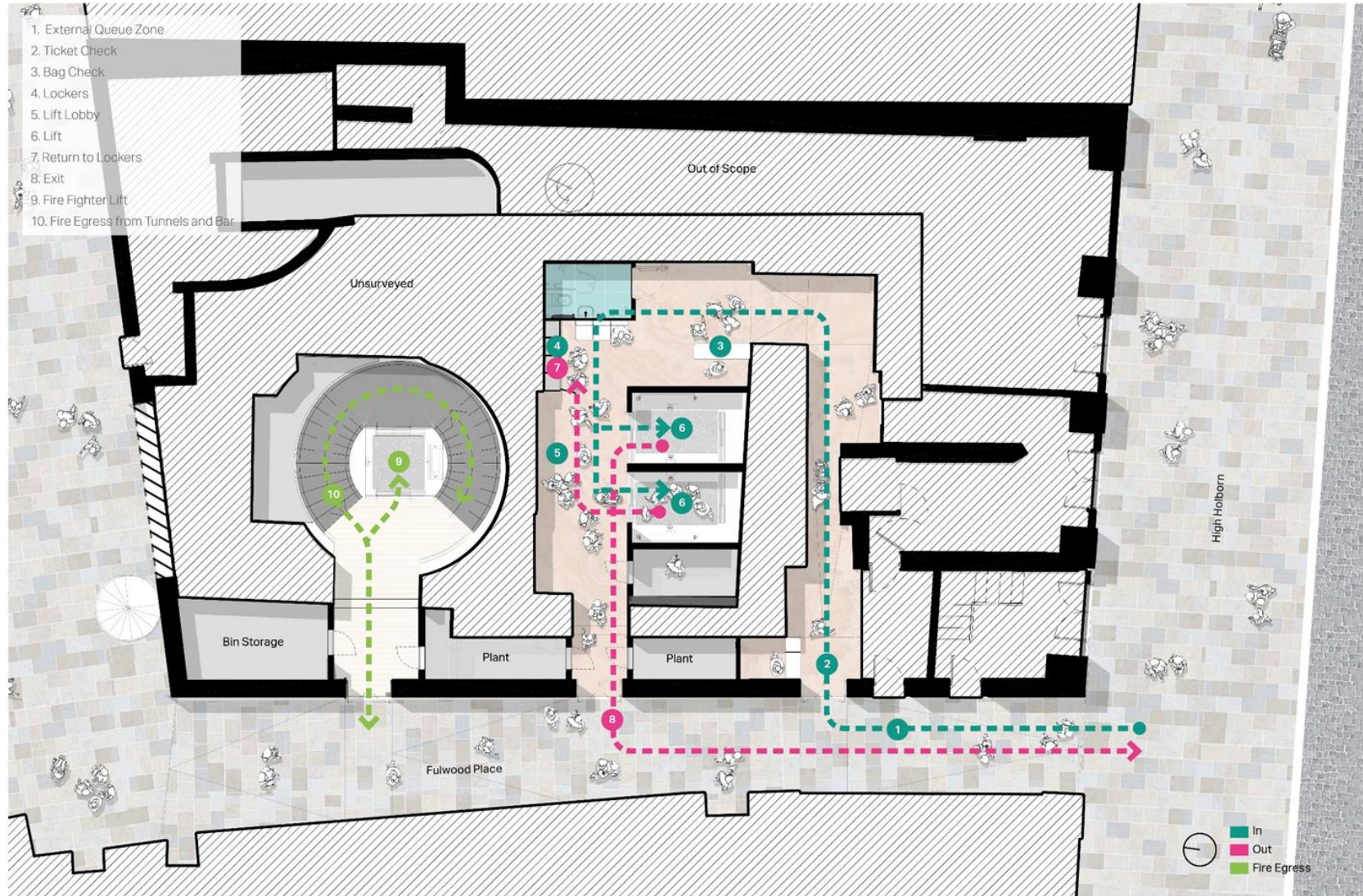




















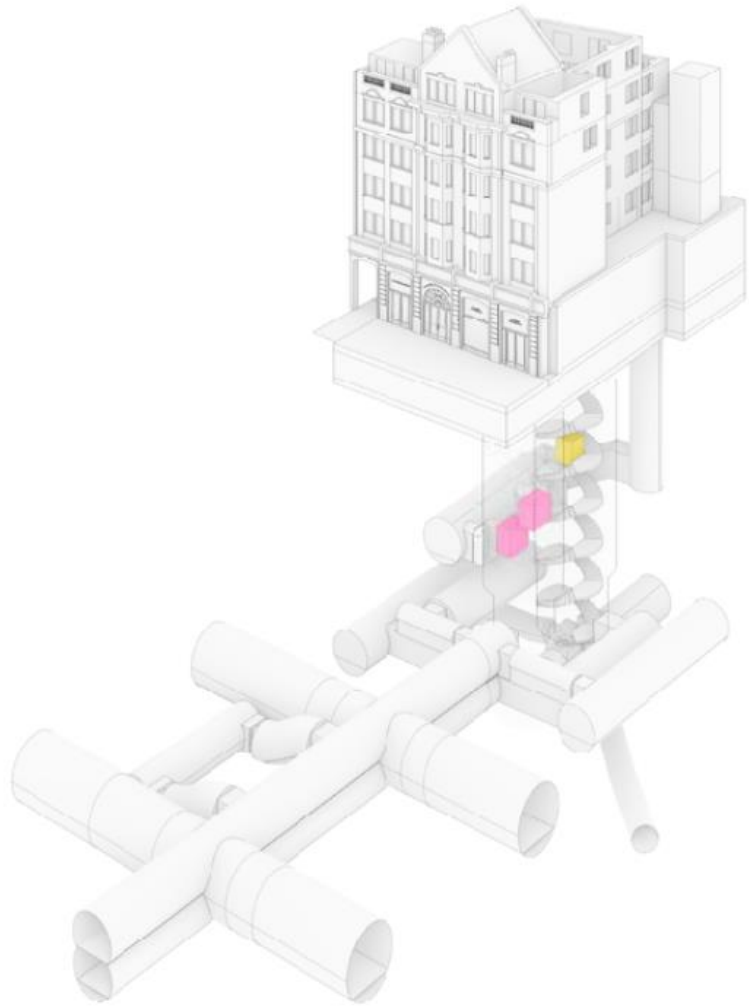




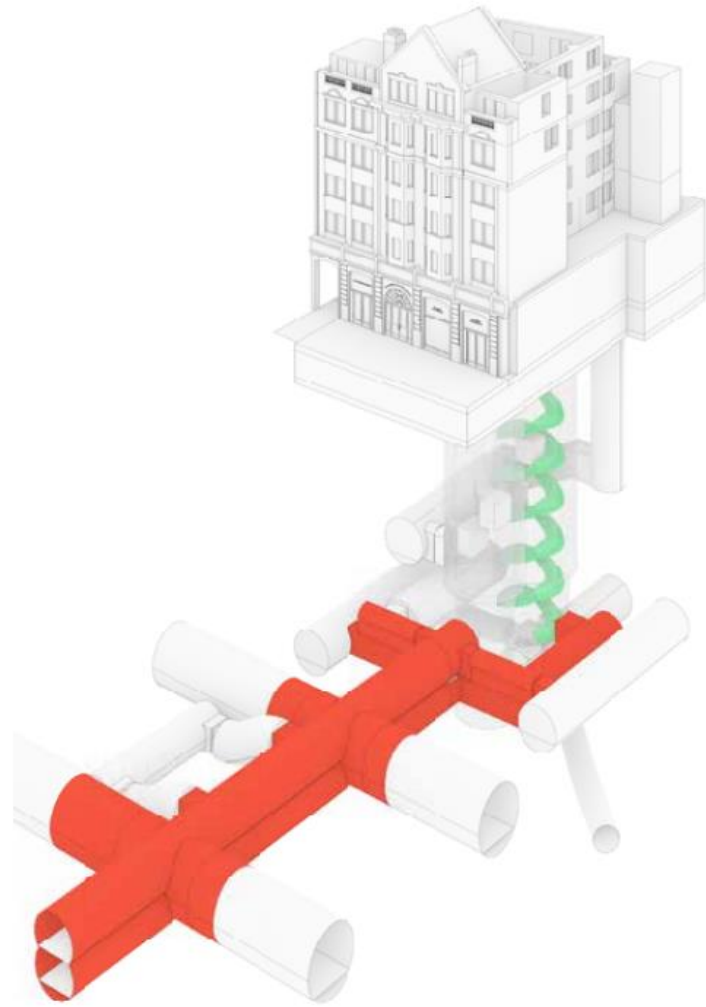








Visitor and Emergency Lifts  
FF Lift



Escape Stair  
Fire Protected Lobby



1 Trunk Exchange



2 Generator

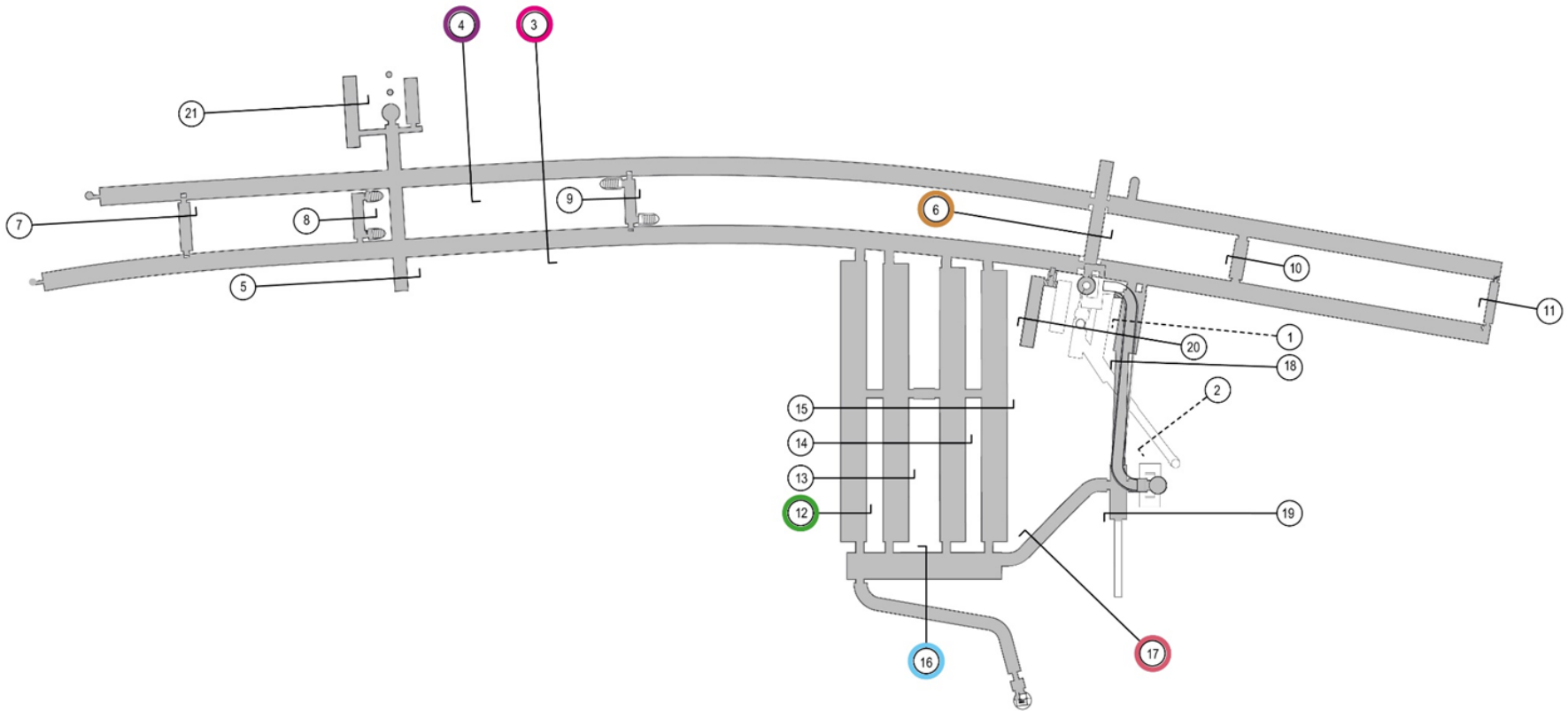


3 Generator



4 Main Distribution Frame

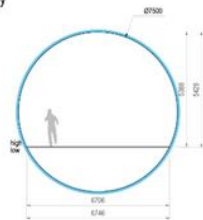




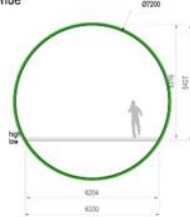
Section 17  
Entrance Corridor



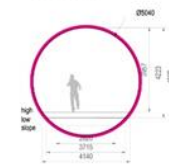
Section 16  
Lobby



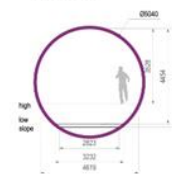
Section 12  
Avenue



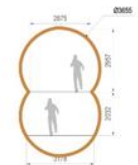
Section 3  
South Street

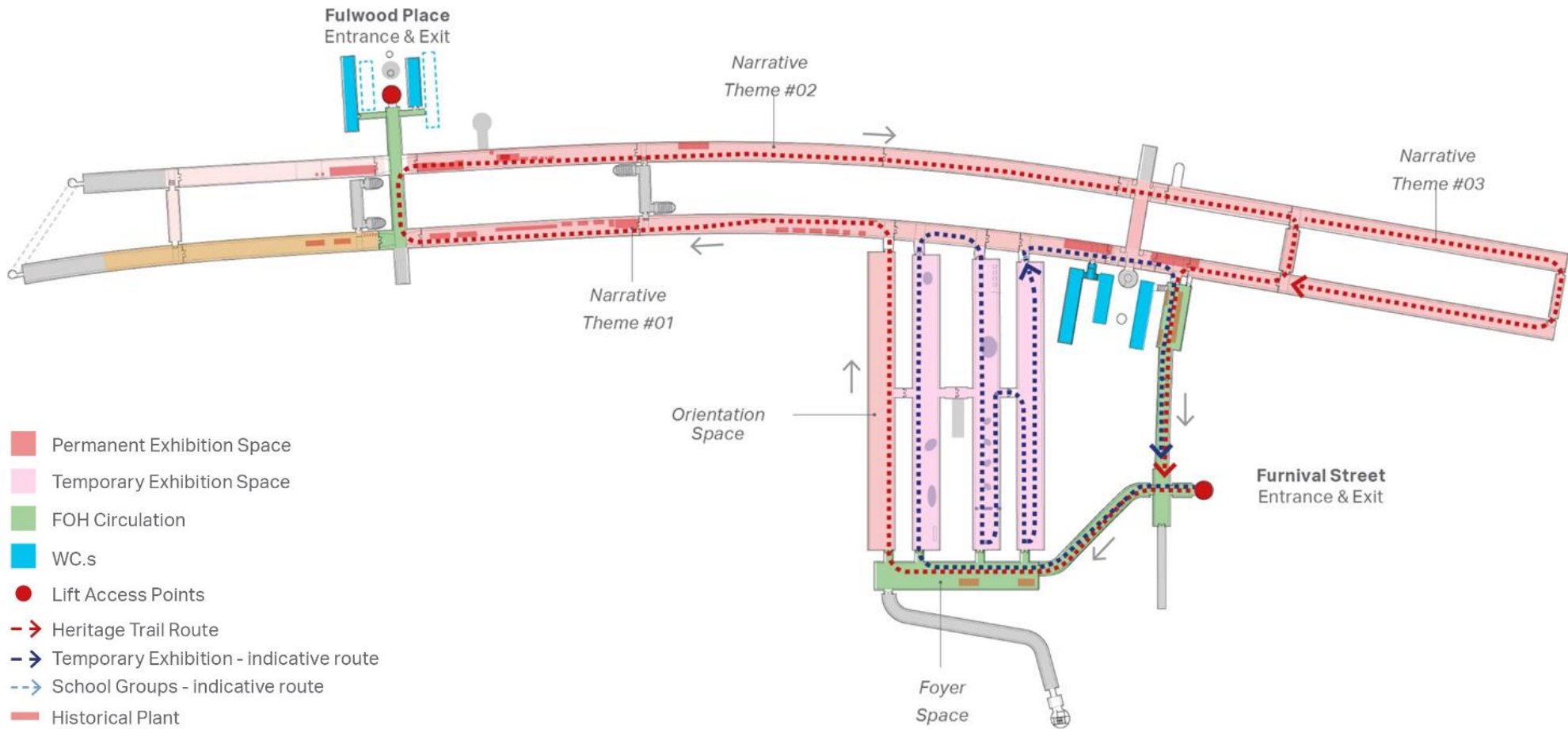


Section 4  
North Street



Section 6  
Double-decker Alley









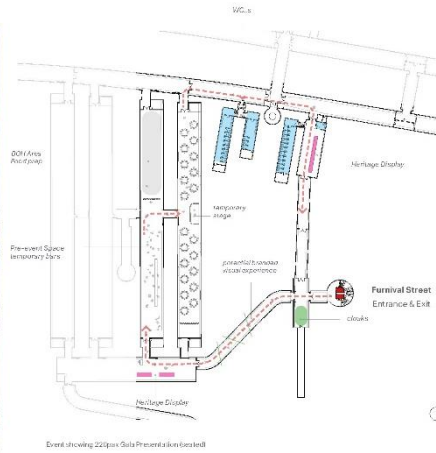




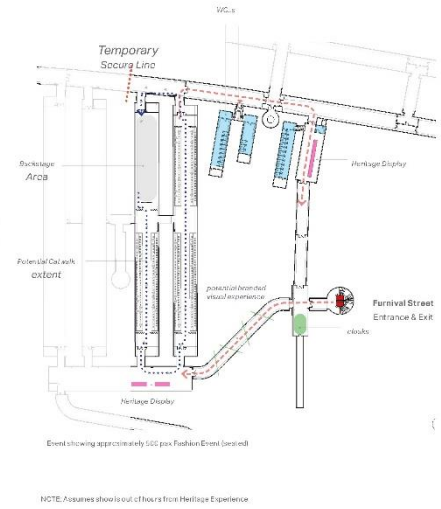




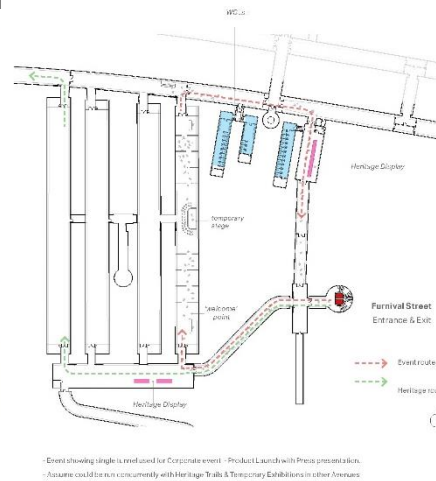
## Gala Event



## Fashion Show



## Product Launch



## Flower Show









