

Address:	The Courtyard 1-7 Alfred Place, 22 Store Street and 220-226 Tottenham Court Road London WC1E 7EB		7
Application Number(s):	2024/4840/P	Officer: Christopher Smith	
Ward:	Bloomsbury		
Date Received:	04/11/2024		
Proposal:	Refurbishment and extension of the building to provide commercial, business and service use (Class E) including infill extension, roof extension and replacement facades to Alfred Place, reconfiguration of entrances and servicing arrangements, rooftop plant equipment, PV panels, new landscaping, provision of cycle parking and other ancillary works.		

Background Papers, Supporting Documents and Drawing Numbers:

Drawings:

TCB-EMR-ZZ-B1-DR-A-00101 PL02
TCB-EMR-ZZ-00-DR-A-00102 PL02
TCB-EMR-ZZ-01-DR-A-00103 PL02
TCB-EMR-ZZ-02-DR-A-00104 PL02
TCB-EMR-ZZ-03-DR-A-00105 PL02
TCB-EMR-ZZ-04-DR-A-00106 PL02
TCB-EMR-ZZ-RL-DR-A-00107 PL02
TCB-EMR-ZZ-ZZ-DR-A-00108_Elevation 1 PL02
TCB-EMR-ZZZ-ZZ-DR-A-00109_Elevation 2 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-00110_Elevation 3 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-00111_Elevation 4 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-00112_Section AA PL01
TCB-EMR-ZZZ-ZZZ-DR-A-00113_Section BB PL02
TCB-EMR-ZZZ-ZZZ-DR-A-01101 PL01
TCB-EMR-Z00-B01-DR-A-02101 PL03
TCB-EMR-Z00-000-DR-A-02102 PL02
TCB-EMR-Z00-001-DR-A-02103 PL01
TCB-EMR-Z00-002-DR-A-02104 PL01
TCB-EMR-Z00-003-DR-A-02105 PL01
TCB-EMR-Z00-004-DR-A-02106 PL01
TCB-EMR-Z00-005-DR-A-02107 PL01
TCB-EMR-Z00-R01-DR-A-02108 PL01
TCB-EMR-ZZZ-ZZZ-DR-A-04101 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-04102 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-05101_Elevation 1 PL01
TCB-EMR-ZZZ-ZZZ-DR-A-05102_Elevation 2 PL01

TCB-EMR-ZZZ-ZZZ-DR-A-05103_Elevation 3 PL01
TCB-EMR-Z00-B01-DR-A-70201 PL02
TCB-EMR-Z00-000-DR-A-70202 PL01
TCB-EMR-Z00-001-DR-A-70203 PL01
TCB-EMR-Z00-002-DR-A-70204 PL01
TCB-EMR-Z00-003-DR-A-70205 PL01
TCB-EMR-Z00-004-DR-A-70206 PL01
TCB-EMR-Z00-R0L-DR-A-70207 PL01
TCB-EMR-ZZZ-ZZZ-DR-A-70401 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-70402 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-70403 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-70404 PL02
Swept Path Analysis Plan Drawing TR002
Existing Highway Arrangement Drawing 001 Rev A
65211993-SWE-Z00-B01-DR-P-03100 Rev P02 drainage plan
65211993-SWE-Z00-005-DR-P-03106 Rev P02 drainage plan
65211993-SWE-Z00-004-DR-P-03105 Rev P02 drainage plan
65211993-SWE-Z00-003-DR-P-03104 Rev P02 drainage plan
65211993-SWE-Z00-002-DR-P-03103 Rev P02 drainage plan
65211993-SWE-Z00-001-DR-P-03102 Rev P02 drainage plan
65211993-SWE-Z00-000-DR-P-03101 Rev P02 drainage plan
65211993-SWE-C01-005-DR-ME-08208 Rev P02 plantroom layout
65211993-SWE-C01-005-DR-ME-08209 Rev P02 plantroom layout

Documents:

Energy and Sustainability Strategy Rev 01, dated 2 February 2025
Plant Screen Updates, dated 14 February 2025 (to follow)
Sustainable Drainage Strategy, dated 7 January 2025
Greenfield run off rates, dated 7 January 2025
Existing Brownfield run-off rates, dated 7 January 2025
Indoor Air Quality Plan, dated 19 September 2024
Additional Viewpoint 4, dated 4 December 2024
Air Quality Assessment Rev 02, dated 10 December 2024
Planning Fire Safety Strategy, dated 13 December 2024
Arboricultural Impact Assessment, dated 28 October 2024
Ecological Impact Assessment, dated 23 October 2024
Planning Noise Report, dated 25 October 2024
Design and Access Statement, dated 24 October 2024
Planning Statement, dated 25 October 2024
Cover Letter, dated 25 October 2024
Draft Delivery, Servicing & Waste Management Plan, dated October 2024
Transport Statement, dated October 2024
Biodiversity Net Gain Exemption Letter, dated 17 October 2024
BREEAM Travel Plan, dated October 2024
Draft Construction Management Plan, dated October 2024

Pre-demolition Audit, dated 23 October 2024
 Daylight Sunlight Report, dated 23 October 2024
 Urban Greening Factor Assessment, dated 10 October 2024
 Built Heritage Statement including Visual Impact Appraisal (VIA), dated October 2024

RECOMMENDATION SUMMARY:

Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:

Knighton Estates Limited, a wholly owned subsidiary of GPE Plc
 c/o Agent

Agent:

Lucy Hale
 Gerald Eve LLP
 One Fitzroy, 6 Mortimer Street
 London, W1T 3JJ

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Class E(g)(i)	Office Use	4,740	6,616	+1876
Class E	Commercial / Business / Service Use	2,596	1,708	-888
Total	All uses	7,336	8,324	+988

Parking details				
Type	Existing spaces	Proposed long stay	Proposed short stay	Difference
Car parking	0	0	0	+/-0
Cycle parking (non-residential)	0	66	0	+66

EXECUTIVE SUMMARY

- i) The application is a commercial development for partial demolition and extension of the existing building to provide refurbished office and retail space including an extension at roof level and an infilled rear elevation. In total, the application involves 8,324sqm of non-residential floorspace including an uplift in floorspace of 988sqm.

- ii) The proposed land uses are similar to those already on the site and in the local area. The amount, density and quality of the office uses on site would increase and the increased number of modernised Class E uses at ground floor would improve the activation of surrounding streets, and the vitality and viability of the existing commercial frontages, including for the Central London Frontage on Tottenham Court Road. The proposed development cannot incorporate housing and as such a financial contribution in line with policy would be provided in lieu of this on-site housing provision, secured through Section 106 agreement.
- iii) The development proposal would partially demolish, refurbish and extend a building that is a positive contributor to the Bloomsbury Conservation Area. Demolition would be kept to a minimum and would only occur to improve the quality and functionality of the refurbished internal accommodation, including to facilitate connections between three formerly separate buildings, and to improve the appearance of the building from public areas. There would be no harm to the conservation area and as such it is considered the proposed development would preserve the character and appearance of the Bloomsbury Conservation Area and would not negatively impact the setting of other nearby heritage assets.
- iv) The proposed development would have high-quality architecture demonstrated through its well-considered composition and detailing and as such it would improve the character and appearance of the host building and the surrounding area. The refurbishment of the ground floor commercial units would improve their viability and vitality and bring greater activity onto local streets thus supporting the Central London Area commercial district.
- v) The proposed development has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight, outlook and privacy. The proposed end uses would also not create significant levels of additional noise disturbance.
- vi) The proposed development would be car-free and would support sustainable transport methodologies through the provision of a quality purpose-built cycle parking area and through the provision of financial contributions in support of local transport and public realm improvements, to be secured through Section 106 legal agreement.
- vii) The proposed development includes energy efficiency and thermal improvements to the existing building including the addition of air source heat pumps, PV panels, green/blue roofs and other building upgrades meaning that it minimises energy demand and is BREEAM 'excellent'.
- viii) Construction and demolition work necessary for this proposed development would be required to adhere to a detailed demolition/construction management plan, supported by appropriate financial contributions secured through Section 106 legal agreement, which would protect the amenity of nearby residents and minimise the impact on the local public realm.
- ix) The scheme complies with the development plan as a whole and therefore is recommended for approval, subject to conditions and a Section 106 legal agreement.

OFFICER REPORT

Reason for Referral to Committee:

Minor development where this involves the construction of upwards of 500 sq. mtrs of non-residential floorspace (Clause 3(ii)), and; subject to the completion of a legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)).

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Town Centre (TC)	Central London Area / Fitzrovia Area Action Plan
Local Plan Centre & Frontage	Tottenham Court Road
Conservation Area	Bloomsbury
PTAL (Public transport accessibility)	6B (best)
Underground development constraints and considerations	- Subterranean (groundwater) flow - Slope stability - TfL zone of influence

Table 1 - Site designations and constraints

Description

1.2 The site is located on the eastern side of Tottenham Court Road, on the northern side of the junction with Store Street. It also fronts onto the western side of Alfred Place. It covers an area of 1,770 sqm.



Figure 1 – Existing site location plan

- 1.3 The existing buildings are four storeys in height onto Tottenham Court Road and Store Street, with five-storeys onto Alfred Place. The site was formerly occupied by retail and restaurant businesses at ground floor, with offices on the floors above and is now mostly vacant, although the Nationwide bank (which does not form part of this application) and Busaba restaurant premises remain open.

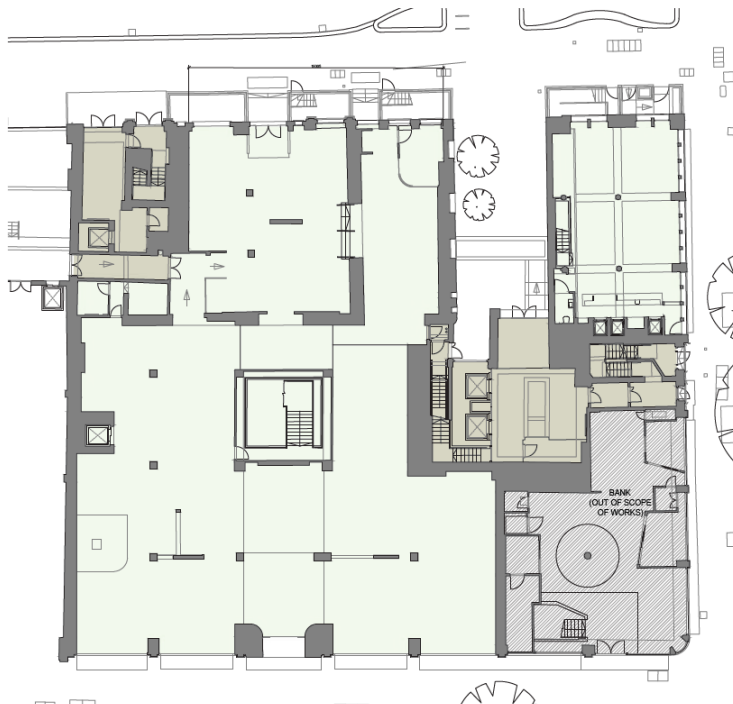


Figure 2 – Existing ground floor plan

- 1.4 The area surrounding the site has a similar commercial character with most buildings featuring retail or restaurant/café uses on the ground floor and office space above. There is also residential accommodation above some shops in the local area.



Figure 3 – Existing site aerial image

- 1.5 The site is located within the Bloomsbury Conservation Area. Opposite the site to the west is the Charlotte Street Conservation Area. The site is not listed, but is considered a positive contributor to the conservation area. The Rising Sun public house opposite the site on Tottenham Court Road is Grade II listed.
- 1.6 The Grade II listed street lamps shown in the image below were recently moved further to the north and as such are no longer located in the vicinity of the site.

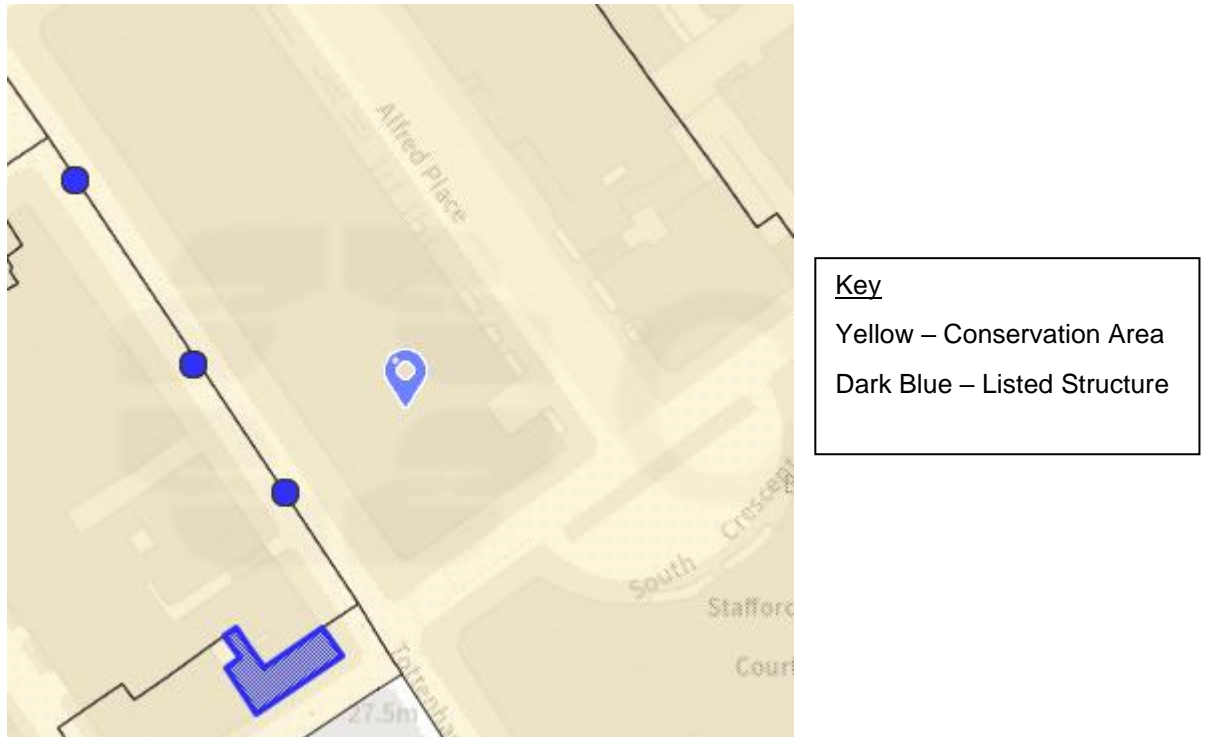


Figure 4 – Map of local heritage designations

- 1.7 The site has a Public Transport Accessibility Level (PTAL) rating of 6B (Best) and is close to several London Underground Stations (particularly Goodge Street, which is located on the opposite side of Tottenham Court Road, and a short walk to the north), as well as a range of bus services.

2. THE PROPOSAL

- 2.1 The proposal is for the partial demolition, refurbishment and extension of the existing building to provide improved and additional commercial, business and service floor space (Class E). The proposed development seeks to provide extended and improved office space on the upper floors with the ground and basement levels re-arranged and refurbished to provide renewed commercial space for a range of uses within Class E, as well as some ancillary service areas for the office uses on the floors above.
- 2.2 The extensions include a rear infill extension onto Alfred Place and a two-storey roof extension to provide 988sqm of additional office and storage space. Replacement facades would be provided to Alfred Place and other external amendments are also proposed that would reconfigure the building's entrance and servicing arrangements.
- 2.3 The development would facilitate a significant internal reconfiguration that would improve the internal experience of the spaces including through simpler access arrangements and level floor-to-floor layouts.

3. RELEVANT HISTORY

The site

3.1 There have been numerous applications submitted for the addresses that form part of the application site over the years. Most of these are small-scale applications relating to provision of adverts or minor alterations to the buildings and these applications are not repeated here as they are not relevant to the proposal.

3.2 Applications for planning permission that have been submitted since 2015 are reported below for reference:

225-226 Tottenham Court Road

3.3 2016/3712/P. Alterations to front and side elevations for ground floor unit (Use A2). Granted 18th August 2016.

3.4 2017/0167/P. Alterations to front facade (facing Tottenham Court Road) on ground floor of existing bank (Class A2). Granted 2nd March 2017.

3.5 2024/0928/P. Installation of new fascia sign to front and side elevations. Granted 20th June 2024.

22 Store Street

3.6 2016/7046/P. Retention of 4 heaters to Store Street elevation. Granted 16th March 2017.

4. CONSULTATION

Statutory consultees

Transport for London

4.1 No objections. Support for cycle parking layout. Request for financial contributions towards construction management, travel planning and vehicle loading measures.

Transport for London - Crossrail

4.2 No objections subject to a condition that secures the safeguarding of future Crossrail 2 infrastructure.

Thames Water

4.3 No objections.

Local groups

Charlotte Street Association

4.4 Objection covering the following issue(s):

Design

- Support proposals to raise cupola and the visually contrasting approach to the roof extension.
- White colouration to the rear infill extension is inappropriate.
- Infill extension should be recessed.

Officer response: Support for the proposals at roof level is noted. A contrasting approach to the infill extension is considered appropriate by the Council's Design and Conservation Officers. See Section 3: Heritage and Design below for details of the case officer's assessment.

Charlotte Street CAAC

4.5 No comments received.

Bloomsbury Association

4.6 Objection covering the following issue(s):

Heritage

- Additional height may adversely impact on the setting of buildings on Bedford Square, which are Grade I listed.
- A visual impact assessment should be undertaken.

Other

- Expressed support for comments made by Charlotte Street Association.

Officer response: The additional height is not significantly visible from most surrounding streets and will not be visible from Bedford Square. The appearance of the roof extension is considered appropriate by the Council's Design and Conservation Officers. A visual impact analysis has been submitted with the application. See Section 3: Heritage and Design below for details of the case officer's assessment.

Bloomsbury CAAC

4.7 Comment covering the following issue(s):

Design

- Roof extension should not take its cue from the cupola.
- Design and materials of the roof extension are inappropriate.
- Brick material finish should be considered.

Officer response: The appearance of the roof extension is considered appropriate by the Council's Design and Conservation Officers. See Section 3: Heritage and Design below for details of the case officer's assessment.

Fitzrovia Neighbourhood Association

4.8 No comments received.

Adjoining occupiers

4.9 Four site notices were displayed on Alfred Place, Store Street, Chenies Street and Tottenham Court Road. The notices were displayed on 20th November 2024 until 14th December 2024 and the application was advertised in the local paper on 28th November 2024 (expiring 22nd December 2024).

4.10 No objections have been received from adjoining occupiers.

5. POLICY

National and regional policy and guidance

National Planning Policy Framework 2024 (NPPF)

National Planning Practice Guidance (NPPG)

London Plan 2021 (LP)

SD4 The Central Activities Zone (CAZ)

SD5 Offices, other strategic functions and residential development in the CAZ

SD6 Town centres and high streets

HC1 Heritage conservation and growth G6 Biodiversity and access to nature

SI 1 Improving air quality

SI 2 Minimising greenhouse gas emissions

SI 4 Managing heat risk

SI 6 Digital connectivity infrastructure

SI 7 Reducing waste and supporting the circular economy

SI 12 Flood risk management

SI 13 Sustainable drainage

T1 Strategic approach to transport

T2 Healthy Streets

T3 Transport capacity, connectivity and safeguarding

T4 Assessing and mitigating transport impacts

T5 Cycling

T6 Car parking

T7 Deliveries, servicing and construction

T9 Funding transport infrastructure through planning

DF1 delivery of the plan and planning obligations

London Plan Guidance (LPG)

Accessible London SPG

Be Seen energy monitoring LPG

Energy Planning Guidance

The control of dust and emissions in construction SPG

Whole life carbon LPG

Sustainable transport, walking and cycling SPG

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy G1 Delivery and location of growth

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

Policy C5 Safety and security

Policy C6 Access for all

Policy E1 Economic development

Policy E2 Employment premises and sites

Policy A1 Managing the impact of development

Policy A3 Biodiversity

Policy A4 Noise and vibration

Policy A5 Basements

Policy D1 Design

Policy D2 Heritage

Policy D3 Shopfronts

Policy CC1 Climate change mitigation

Policy CC2 Adapting to climate change

Policy CC3 Water and flooding

Policy CC4 Air quality

Policy CC5 Waste

Policy TC1 Quantity and location of retail development

Policy TC2 Camden's centres and other shopping areas

Policy TC4 Town centre uses

Policy TC5 Small and independent shops

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

Local area action plan

Fitzrovia Area Action Plan (2014) (FAAP)

Policy F1 Planning decisions in Fitzrovia

Principle 1 Housing and affordable housing

Principle 4 Small and medium enterprises

Principle 5 Retail provision

Principle 9 Residential amenity

Principle 10 Sustainability and local energy networks

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
Biodiversity CPG - March 2018
Design - January 2021
Developer Contribution CPG - March 2019
Digital Infrastructure CPG - March 2018
Employment sites and business premises - January 2021
Energy efficiency and adaptation - January 2021
Planning for health and wellbeing - January 2021
Town centres and retail - January 2021
Transport - January 2021
Trees CPG - March 2019
Water and flooding CPG - March 2019

Other guidance

Planning Statement - Intermediate Housing Strategy and First Homes (2022)
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 consultation closed on 13 March 2024. The DCLP is a material consideration 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).

6. ASSESSMENT

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

7.	Land use
8.	Impact on neighbouring amenity
9.	Heritage and design
10.	Sustainability and energy
11.	Trees, greening and biodiversity
12.	Air quality
13.	Flood risk and drainage
14.	Transport
15.	Employment and training opportunities

16.	Community infrastructure levy (CIL)
17.	Conclusion
18.	Recommendation
19.	Legal comments
20.	Conditions
21.	Informatives

7. LAND USE

- 7.1 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved.
- 7.2 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site.
- 7.3 Policy F1 of the Fitzrovia Area Action Plan (FAAP) states that when considering development proposals within the boundary of the FAAP the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
- Ground floor commercial floor space***
- 7.4 Camden Local Plan Policy E1 states that the Council will create the conditions for economic growth and will harness the benefits for local residents and businesses. To achieve this the Council will support businesses of all sizes, including small and medium-sized enterprises. It will ensure there is a stock of premises for a range of businesses with differing resources and shall recognise the benefits of the range of employment generating uses including retail uses.
- 7.5 Local Plan Policy TC1 states that there should be significant retail provision on Tottenham Court Road, whilst Policy TC2 states that Camden's town centres, including those in Central London, shall be promoted in order to serve the needs of residents, workers and visitors. Policy TC4 states that new development should not cause harm to the character, function, vitality and viability of the town centre, the local area or neighbouring amenity.
- 7.6 Principle 4 of the Fitzrovia Area Action Plan states that the Council will support the development of flexible business space to ensure it can be occupied by small and medium-sized businesses. Principle 5 of the same

document aims to secure larger-scale retail-type units on Tottenham Court Road.

7.7 There would be an overall increase in floor space on site. The proposed roof and rear infill extensions would accommodate a significant increase in office floor space. There would be a slight reduction in the amount of retail floor space that is currently provided at ground floor level, as this space is reconfigured and partially replaced by areas that are ancillary to the expanded office areas.

7.8 Until April 2023 the large retail frontage onto Tottenham Court Road was occupied by a furniture store. This store took up most of the ground floor area and thus was also accessible from a smaller shop frontage on Alfred Place. The same unit also benefited from additional commercial floor space at basement level. The main proposed change to the ground floor layout is that this large retail unit across the ground and basement floors would be split into five separate units. There would be three smaller units fronting onto Tottenham Court Road, two of which would incorporate basement level floor space. A new single unit would also be created fronting onto Alfred Place. The existing restaurant at the corner of Alfred Place and Store Street would be mostly retained in its current layout.

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Class E(g)(i)	Office Use	4,740	6,616	+1876
Class E	Commercial / Business / Service Use	2,596	1,708	-888
Total	All uses	7,336	8,324	+988

Table 2 – Existing and proposed and use floorspaces

7.9 The remaining space at ground and basement levels which does not form part of these recalibrated retail areas would become ancillary reception, service and supporting areas for the expanded and refurbished office areas. Hence the subdividing of the former furniture store and conversion of part of the store’s floor space to ancillary office space leads to a reduction in the amount of Class E space at ground level that could be used for commercial activities such as retail or restaurants.

7.10 The smaller flexible Class E units are expected to provide refurbished retail space more in keeping with the requirements of contemporary retail businesses. These retail units are more likely to be occupied than a unit with a larger floorplate would be in this area, which is now increasingly characterised by finer grain retail operations. The units would also be of

greater benefit to small and medium-sized enterprises rather than larger occupiers. The increase in smaller flexible retail spaces is therefore welcomed, noting the wider context of the development which will bring an increased overall provision of commercial floor space to the site.

Proposed office uses

- 7.11 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site. The Council anticipates Central London playing a key role in facilitating that growth. The supporting text to Policy G1 states that the Council shall promote and encourage high-quality developments with high densities to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of the borough, whilst also seeking to improve the quality of the environment, protect the amenity of occupiers and neighbours and meet other relevant planning objectives.
- 7.12 Policy E1 of the Local Plan states that the Council will support businesses of all size, and that offices are considered suitable uses within the Central London Area. The demand for office space in Camden is expected to increase by 695,000sqm between 2014 and 2031 as noted in the Local Plan.
- 7.13 Policy E2 of the Local Plan states the Council will protect suitable business sites for continued and higher density business use provided that the amount of business floor space is maintained or increased and the function of the Central London Area will not be affected.
- 7.14 The site is located within a part of the Central London area with the highest possible transport accessibility (PTAL of 6b). The proposed development would utilise the site more effectively through increasing both the amount of office floor space and the density of the activities on it. The applicant has stated that the number of jobs on site (all uses – but predominantly from the office activities given the split and nature of the floor space on site) would increase from 398 to 995, which is an approximate 2.5 times increase in the employment level on site.
- 7.15 The additional office space would contribute towards meeting the increased demand for office space in Camden and also would support the ongoing functioning of the Central London Area.
- 7.16 Policy E1 requires the provision of high-speed digital infrastructure. It is expected that a high-quality refurbished office space such as that proposed would connect to such infrastructure and this can be secured by condition (Condition 21).

7.17 As such, the increased provision of office floor space at a higher employment density is supported in principle in land use terms.

Non-provision of self-contained housing

7.18 Policy H2 of the Local Plan states that where new non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses. The policy continues to state that, in the Central London Area (CLA), development providing more than 200sqm of additional floorspace will require 50% of all additional floorspace to be self-contained housing, subject to considerations relating to the character of the area, development and site, site-specific constraints, compatibility with existing and proposed uses, and other relevant matters.

7.19 Policy H2 also states that the required amount of housing should be provided on-site, unless this is not practical or the housing could be more appropriately provided elsewhere, including on alternative sites nearby. The policy notes that developments where less than 1,000sqm of new floor space is proposed may not be suitable for on-site self-contained housing. In exceptional circumstances the Council will accept an appropriate payment in lieu of on-site self-contained housing.

7.20 Principle 1 of the Fitzrovia Area Action Plan states that the Council will promote the development of permanent self-contained housing unless there are strong economic reasons why such development would be inappropriate.

7.21 The proposed development would increase the amount of non-residential floor space on site by 988sqm which results in a requirement for 494sqm of self-contained housing.

7.22 The applicant has submitted a detailed analysis of the reasons why self-contained housing cannot be provided on-site as part of this development which is summarised within pages 86 and 87 (with further elaboration in the appendices) of their *Design and Access Statement*.

7.23 The applicant was asked to explore the feasibility of on-site provision during pre-application discussed and a range of locations within the upper floors of the building were assessed as to whether they would be appropriate locations for new residential units. Options locating residential units on the eastern (Alfred Place) side of the building and at the corner of Alfred Place and Store Street were identified as being most achievable and were subsequently investigated further.

7.24 The investigations identified fire safety requirements as a principal reason why such a combination of uses on the upper floors could not be achieved, as the necessary additional sprinkler, smoke ventilation and backup power supply systems, combined with evacuation lift and additional structural requirements, would mean that the residential units would compromise the

proposed retail space and frontages at ground and basement level, would require additional demolition of the building and a related loss of historic building fabric, and would lead to a critical loss of development floor plan efficiency overall. Such a loss of efficiency and compromised quality of the office spaces means that the development proposal would also be significantly compromised from an economic perspective.

- 7.25 As such, it is considered that on-site housing is not suitable in the specific circumstances relating to this development proposal.
- 7.26 The applicant has investigated whether any of the other sites within their property portfolio locally could be suitable for housing instead. The applicant owns nos. 31-32 and 33-34 Alfred Place. This site has been through a very recent refurbishment and is now partially operational as an office. It is therefore considered not to be appropriate for conversion to housing. The applicant also owns Whittington House (19-30 Alfred Place) which is a visually prominent office building designed by Richard Seifert and Partners. It is a visually iconic building that makes a positive contribution to the Conservation Area which is built right up to the street frontage on its northern and western sides and is otherwise surrounded by existing development. This site is also considered not to be appropriate for conversion to housing. They do not own any other sites in the vicinity.
- 7.27 The highly developed nature of the urban environment locally also means that there are no other appropriate developable sites immediately available nearby where self-contained housing could be provided instead.
- 7.28 Therefore, Policy H2 allows that, in an exceptional situation such as this, a payment in lieu of providing new housing on-site may be secured instead. This has been calculated at £741,000 (988sqm x 50% x £1,500) and shall be secured through S106 legal agreement.

8. IMPACT ON NEIGHBOURING AMENITY

- 8.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise.
- 8.2 Principle 9 of the Fitzrovia Area Action Plan (FAAP) requires the Council to have regard to the impacts on residential amenity that arise from the dense mix of land uses in the FAAP area.
- 8.3 Impacts from construction works are also relevant but are dealt with in the 'Transport' section rather than here. 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.

Daylight and sunlight – non-residential premises

8.4 Paragraph 3.7 of the CPG states:

“Although it is normally only residential uses that are assessed, there may also be non-residential uses, existing nearby or proposed as part of the application, that are particularly sensitive to light and so justify a report.”

8.5 In the case of this development proposal, the majority of non-residential properties nearby are non-sensitive uses such as retail shop units, restaurants/cafés and offices that are well-separated from the application site given the existing layout of local street blocks. The impact of the proposed development on these non-residential activities is therefore considered minimal and as such limited weight is attached to any impacts.

Daylight and sunlight – residential premises

8.6 A *Daylight and Sunlight Assessment* has been submitted as part of the application which considers potential impacts upon neighbouring properties.

8.7 The area surrounding the site is predominantly commercial. The nearest residential properties are those at 21A Store Street opposite the site to the east and 46, 47, 51 and 53-54 Tottenham Court Road opposite the site to the west.

8.8 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 ‘Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice’ (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.

8.9 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

8.10 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:

- **Vertical Sky Component (VSC)** – The daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.

- *The BRE considers daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.*
- **No Sky Line (NSL)**, also known as **Daylight Distribution (DD)** – The daylight penetration into a room. It measures the area at desk level (“a working plane”) inside a room that will have a direct view of the sky.
- *The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
- **Annual Probable Sunlight Hours (APSH)** - The amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
- *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. If below this, impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.*
- **Sun-hours on Ground (SoG)**, also known as **Overshadowing** – The amount of direct sunlight received by open spaces.
- *The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on 21 March (spring equinox), and the area which can receive some sun on 21 March is less than 0.8 times its former value.*

Assessment

- 8.11 The *Daylight and Sunlight Assessment* states that all windows of those closest residential properties would be compatible with the BRE guidelines with the proposed development in place, with respect to both daylight impacts and sunlight impacts.
- 8.12 The nature of the proposed development as infilling existing space within the host site and adding recessed floors to the roof of the existing building means that there would be no significant additional overshadowing of Alfred Place from the proposed development.
- 8.13 As such, the proposed development is compatible with both the London Plan and Camden’s Local Plan with regard to daylight and sunlight impacts, and in terms of overshadowing of nearby public spaces.

Outlook and Privacy

- 8.14 For similar reasons to the day/sunlight assessment above, noting that the existing building is already occupied by offices on the upper floors and retail/restaurant units on the ground floor, given that the additional floors at roof level would be set back from the main elevations of the building and also

given that the development proposal would infill an existing building recess, it is considered there would be no negative impact to the outlook and privacy of nearby residential and non-residential uses.

Noise

- 8.15 Although the intensity of the uses within the building is expected to increase as a result of this proposal the site is already located in a busy commercial part of the Central London Area and as such the noise associated with comings and goings to and from the site, as well as the office and retail uses themselves, is not expected to be disturbing to local residents or businesses above and beyond the existing situation.
- 8.16 As regards noise from plant equipment, noise from the proposed plant has been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building and the proposed development itself. The *Planning Noise Report* submitted with the applicant indicates that the proposed plant installations should be capable of achieving the Camden's environmental noise criteria at the nearest and most affected noise sensitive receptors, i.e. the closest residential properties.
- 8.17 The Council's Environmental Health Officer has raised no objections subject to conditions (Conditions 7 & 8) that would control noise and vibration emissions from the proposed plant equipment.
- 8.18 As such, it is considered there would be no unacceptable impacts on nearby residential properties in terms of disturbance from excessive noise, subject to conditions.

9. DESIGN AND HERITAGE

- 9.1 The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 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; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. Camden's Local Plan is supported by CPG (Design).

Site and its surroundings - summary

- 9.2 The site takes up a city block on the intersection of Tottenham Court Road and Store Street and is comprised of two different buildings with a front and back. The two original buildings, 220-226 Tottenham Court Road and 3-7

Alfred Place, were built around the turn of the 20th century and around the same time as the adjoining block at 217-219 Tottenham Court Road.



Figure 5 – View of site from corner of Alfred Place and Store Street



Figure 6 – View of site from Store Street



Figure 7 – View of site from Tottenham Court Road

9.3 The front of the building faces onto Tottenham Court Road, a busy town centre thoroughfare, and the back onto Alfred Place gardens, a quiet green pedestrianised street and play space. Alfred Place has recently been subject to public realm improvements that have turned it into a planted pedestrian thoroughfare. The ground floor comprises of retail floor space fronting onto Tottenham Court Road, creating a clear retail frontage, and a restaurant fronting onto Store Street. Alfred Place has a more utilitarian appearance than the well-defined retail character on Tottenham Court Road.

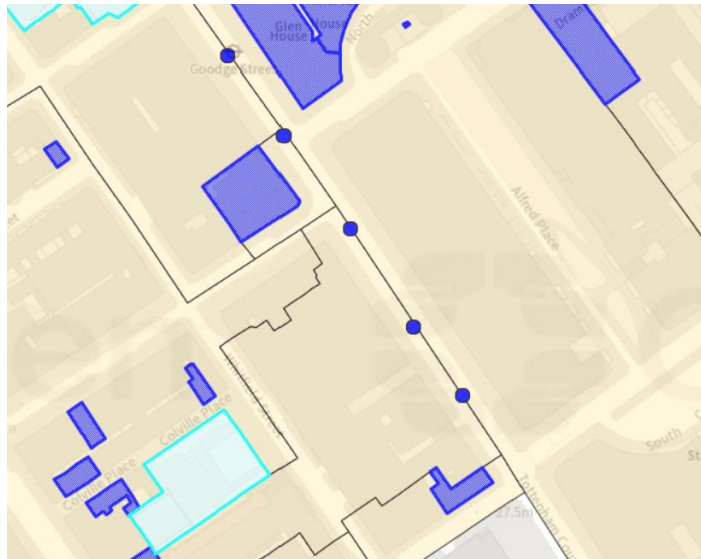
Designated and non-designated heritage assets

9.4 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.

9.5 The application site is located within the Bloomsbury Conservation Area. The western side of Tottenham Court Road, opposite the site to the west, is located within the Charlotte Street Conservation Area.

9.6 Opposite the site to the west at 46 Tottenham Court Road is the Rising Sun Public House which is Grade II listed. Further to the north is the Grade II listed former Catesby's Store at 64-67 Tottenham Court Road and 2-8 Goodge Street. Glenn House and Minerva House, located beyond the north of Alfred Place (on North Crescent) are also Grade II listed buildings.

9.7 There is also a Grade II listed war memorial at the northern end of Alfred Place, fronting onto Chenies Street. It should also be noted that the heritage designations map provided below shows Grade II listed lamp posts in the centre of Tottenham Court Road opposite the site. However, these lamp posts were moved north to a location outside of Heal's (196 Tottenham Court Road) several years ago and as such no longer form part of the setting of the site. Other listed or locally listed buildings shown on the map below are not visible from the application site.



Key	
Yellow	– Conservation Area
Dark Blue	– Listed Structure (Grade II)
Light Blue	– Locally Listed Structure

Figure 8 – Expanded map of local heritage designations

9.8 The impact of the proposed development on these key heritage assets is discussed in the sections below.

Bloomsbury and Charlotte Street Conservation Areas – no harm

9.9 The main impact of the proposals would be on the Bloomsbury Conservation Area, which covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln’s Inn Fields in the south and from Tottenham Court Road in the west to King’s Cross Road in the east.

9.10 The original street layouts, which followed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area.

9.11 The area’s underlying townscape combined with the influence of the major institutional uses that became established in the district and expanded over time is evident across the large parts of the Conservation Area. Some patterns of use have changed over time, for example, offices and hotels came to occupy former family dwelling houses as those families moved out of central London to the suburbs during the later 19th and 20th centuries. However, other original uses have survived and help to maintain the area’s distinctive and culturally rich character (the most notable include hospitals, university and academic uses, cultural institutions such as museums, legal uses, and on a smaller scale, specialist retailers including booksellers and furniture shops).

9.12 The site is also adjacent to (and visible from within) the Charlotte Street Conservation Area. The area is a part of Fitzrovia that was developed speculatively as a primarily residential area in a relatively short space of time (1750-1770). During the later 18th and 19th centuries the area declined in

popularity as a residential suburb and became more mixed, attracting artists, craftsmen and communities from Europe who then established businesses. Shops and public houses were developed or inserted into older buildings and a mix of residential uses, cafes and small businesses established at ground level.

- 9.13 The contribution of the positively contributing host building to the significance of the conservation areas derives from its evidential value as a substantial piece of architecturally treated commercial architecture from the pre-1880 to 1940 period. The other late C19th buildings on this part of Tottenham Court Road typically share a consistency of scale and massing. The façades are constructed from a variety of materials and embellished with a range of decorative motifs to give visual interest and a distinct character to their public face, particularly at upper floor and roof level.
- 9.14 The Bloomsbury Conservation Area appraisal highlights the prominence of 220-226 Tottenham Court Road's two small roof turrets which feature in views along Tottenham Court Road. The site makes a positive contribution to the character and appearance of the Bloomsbury Conservation Area primarily through its historic character.



Figure 9 – Image of the infill extension on Alfred Place

- 9.15 The proposed white faience brick infill extension fronting onto Alfred Place will be clearly visible in the local streetscape. It would replace an existing awkward opening in the building line which currently features an out-of-character modern glazed link. The new infill would effectively blend into the existing row of buildings that currently line the western side of Alfred Place due to its high quality and well-considered scale, building line, proportions

and fenestration pattern. The existing awkward opening and uncharacteristic glazed infill would be removed from part of this view, which is considered to be a heritage benefit.



Figure 10 – Image of the proposed Alfred Place elevation

- 9.16 The proposed roof pavilion element would be constructed of a complementary turquoise/blue material and would be set-back recessively from the parapet line. It would represent only a minor change to a small number of public views from within the conservation area that would in any case, during parts of the year, be partially screened by large street trees and the proposed roof level planting. Although the proposed additional height and massing would be appreciable at high level and to the skyline, this change to the conservation area would otherwise sit comfortably within the prevailing building heights and varied roofscape of the townscape as seen in local views.



Figure 11 – Image of the roof extension from Store Street in winter months

- 9.17 The proposed uplifted cupola to 220-226 Tottenham Court Road will be legible as a small introduction of built form at roof level within views on that street. The cupola would lead to an improvement of this view by increasing the visibility of a characterful waymarking feature of a building. The accurate visual representation (AVR) views provided by the applicant show that the proposed rooftop pavilion would only be slightly visible in views from the south behind 220-226 Tottenham Court Road's existing parapet line due to the setting back of this part of the extension.
- 9.18 The proposed roof pavilion will be most visible when looking towards Store Street from the western side of Tottenham Court Road (see Figure 12B below). Even then, only the upper levels of the pavilion will be legible. Although additional height and massing will be appreciable at high level and to the skyline, this change would otherwise sit comfortably on the host building and within the prevailing building heights and varied roofscape. The proposed roof planting is considered a minor visual component of the view but one that will contribute to its visual amenity.



Figures 12A (top) & 12B (bottom) – Images of the existing and proposed site with roof extension and relocated cupola visible

- 9.19 The host building is currently mostly unoccupied, and the proposed development would restore its former uses albeit in a differing and upgraded format. This aspect of the proposals would both sustain and enhance the character and appearance of the surrounding conservation area in contributing positively to its mixed-use character, and the vitality and vibrancy of this local area. In upgrading this part of the urban block, these proposals seek to retain and reuse its fabric and key historic and architectural features, which contribute strongly to the street scene and local views, whilst also delivering development in a sympathetic manner and to a high standard

of architectural design, including the provision of a roof level addition that is respectful to the existing central cupola (which would be reused and re-presented).

- 9.20 Although there is some demolition to the rear elevation of the building as a result of this proposal it is considered that the demolition is necessary to significantly improve the connectivity internally, throughout a single building that was originally two separate buildings and which is currently ineffectively connected by a dated glazed infill extension, and noting that the demolition would enable a more holistic approach that enables a better proportioned and more comprehensive infill extension to be provided. The Conservation Officer considers that, overall, the proposal would improve the character and appearance of the street frontage on Alfred Place and would be respectful of the heritage character of the Bloomsbury Conservation Area.



Figure 13 – Proposed demolition (in red) of parts of façades on Alfred Place

- 9.21 The proposed development would be able to deliver a number of public heritage benefits that would enhance and better reveal the significance of this designated heritage asset, such as securing the long-term viable use of an existing positive contributor in a use category which is comparable to their original function; optimising the existing mixed commercial use of the site in a way that would contribute to the characteristic vibrancy and vitality of the local area; reinstating and maintaining active and visually interesting frontages on Tottenham Court Road and Store Street; contributing positively to the use and animation of the recently completed public realm at Alfred Place; improving the character and appearance of the existing historic building elevations through the undertaking of necessary repairs, upgrades and the reinstatement of lost or damaged architectural features, materials and detailing (principally to Tottenham Court Road and Store Street as part

of this scheme of works); improving the efficiency and usability of the roof level of the building, and; re-presenting the distinctive cupola that would increase its presence and appreciation in local and some longer views along Tottenham Court Road.

- 9.22 Furthermore, the proposal would remove the poorly designed existing modern glazed service core and replace the entrance bay to the gap in the building line to Alfred Place, which are not positive features of the character and appearance of the host building or the surrounding conservation area, and would replace these features with new infill built development that would create a more consistent building line and enclosure to Alfred Place, as well introducing new contemporary architectural design of a very high quality that responds appropriately and positively to the distinctive characteristics of the host building and local townscape. In particular, the development would reflect the established elevational proportions, rhythm and use of materials and detailing as visible on Alfred Place.
- 9.23 The Council's Conservation Officer has stated that the proposed development has paid due consideration to the historic townscape context and distinctive characteristics of this prominent Central London location and that due regard has been given to the conservation of heritage assets as part of the design process and scheme development, in adopting a sympathetic approach to the particular significance, setting and shared views for these assets. It is therefore determined that there would be no harm to either of these conservation areas.

Rising Sun Public House – no harm

- 9.24 This public house built in 1896 by Treadwell and Martin is a four-storey building with an elaborate Art Nouveau Gothic façade on two sides. Its ground floor is a pilastered public house frontage with entrance in a splayed corner, that was altered at some point in the twentieth century.
- 9.25 The site is located immediately to the east of this listed building across Tottenham Court Road and can be seen in combination with the pub in some local and middle-distance views along Store Street and Tottenham Court Road. In these views this listed building is seen as part of a wider and mixed character local built context. The chief relationship between the two buildings is their inter-visibility as contemporary pieces of late Victorian streetscape.
- 9.26 The proposed introduction of a fourth-floor pavilion and plant enclosure above would not harm the appreciation of the architectural or historic interests of the Rising Sun Public House within its setting. In most local views the new roof level additions will only be episodically and minimally visible as a recessive background element to the wider roofscape, underlined by the deliberate set back of this element from the parapet edge to Tottenham Court Road, its sculpted form, and appropriate use of materials.

- 9.27 One of the key views from where the distinctive architecture and roofline of the Rising Sun Public House can be appreciated is from the other side of Tottenham Court Road immediately to the east. This view will remain unaffected by the proposed development.
- 9.28 In those longer shared views north and south along Tottenham Court Road the raising of the original cupola on the subject site enhances the existing visual relationship between this and the characteristic roofscape of the listed public house nearby is retained as an interesting feature of this skyline. The proposed improvements to the shopfronts of the subject site also enhance the setting of the listed public house by creating a more traditional commercial street frontage opposite it.
- 9.29 As such, the proposed development would preserve the significance of the Grade II listed Rising Sun Public House, and to a degree enhance the character and appearance of this part of its immediate townscape setting and shared views, including the contribution made to the character and appearance of the two conservation areas. As such, there is no harm to this heritage asset from the proposed development.

Former Catesby's Store, 64- 67 Tottenham Court Road and 2-8 Goodge Street – no harm

- 9.30 This is a former carpet and linoleum store, with former public house at corner, which has been sub-divided into retail use on ground floor, with office uses above. It is a Free Renaissance style building by Henry Alfred Whitburn 1903, with possibly earlier range to west facing onto Goodge Street. It is listed principally for its exceptionally exuberant facades, which embody the commercial confidence of Edwardian London and which are spirited examples of eclectic historicism in architecture.
- 9.31 The historic metropolitan route of Tottenham Court Road contributes to its significance because it contains a variety of other coarse grain Victorian and early 20th century retail and commercial buildings that were originally built for the purpose of the furniture trade. The proposed development on the application site will not change this primary contributing element of that former store's setting in terms of the appreciation of that historic character and former uses.
- 9.32 The proposed new pavilion at roof level, and centralised plant enclosure above, will sit comfortably within the depth of the plan of the site, and so ensure that the principal frontage of this historic building retains its prominence and primacy in local and also longer distance views from and along Tottenham Court Road.
- 9.33 The raising of the cupola on site in order to increase its presence and appreciation in longer views along the street will also ensure that the existing visual relationship between this and the taller tower and characteristic

roofscape of the listed building is retained as an historic feature of the shared skyline.

9.34 The remaining viewpoints from where the distinctive architecture of the former Catesby's Store can be best appreciated are from the other side of Tottenham Court Road looking westwards or looking north to the marked corner turn with Godge Street. These viewing experiences are each orientated away from the host site and thus would be unaffected by the proposed development.

9.35 The proposed development would therefore preserve the setting of the Grade II listed Former Catesby's Store, and to a degree enhance the character and appearance of this part of its wider townscape setting including its contribution to the character and appearance of the conservation area. Therefore, it is considered that there is no harm to the setting of this heritage asset.

Glen House, Minerva House and the North Crescent War Memorial – no harm

9.36 These structures north of the site, fronting North Crescent, form a group of architectural value. The buildings have concave elevations which follow the line of the crescent and are uniform in terms of heights.

9.37 These heritage assets are located more than 100 metres from the site and beyond the northern elevation of the street block within which the host building is sited (on its southern end). The proposed development would not be clearly visible from outside of these buildings/structures. As such, there would be no harm to these heritage assets from the development.

Bedford Square – no harm

9.38 Comments have been made concerning the potential visibility of the development proposals from Bedford Square, which is over 100 metres away to the south and screened from the site by buildings up to six storeys in height. The established street pattern, density of surrounding built development, topography, and mature vegetation mean that the main areas where the proposed additional built form would be visible primarily includes the roads running past or close to the site boundary, such as Tottenham Court Road, Store Street, North Crescent, South Crescent, Windmill Street, Alfred Place and Chenies Street. The townscape analysis provided by the applicant indicates that there would not be any notable visual impacts from the new roof level alterations within nearby public open space of Bedford Square including within the skyline setting of its listed buildings.

9.39 As such, it is considered there would be no harm to these heritage assets from the development.

Design analysis

- 9.40 The proposed design stitches the originally separate parts of the existing building together through adjusting levels internally, creating smoother, accessible circulation routes that create better use of the floor plate. The infill fronting onto Alfred Place provides a modern yet sensitive addition to the historical buildings through its well-considered use of scale and materiality. The upgrades provided to the ground floor frontages would create a more inviting feel.
- 9.41 The ground floor on Alfred Place would contain the main office entrance lobby, a reception and casual meeting area for the offices as well as a back of house entrance for cycles / delivery of larger goods to the building. Visitors would arrive into a generous lobby area with a reception to the left, directly in front of the entrance and would be drawn up into a wide inviting staircase that brings them to the covered amenity courtyard space. The space spans upwards by four floors, with occupants at each level being able to look into the atrium; the glazed atrium also helps to improve daylighting throughout the depth of the floor plate.
- 9.42 Floor plans are relatively consistent throughout the first to third floors, with access to office space possible through the two cores either side of the building. This significantly improves the accessibility of site and represents a notable upgrade to the building in terms of there being level access throughout.

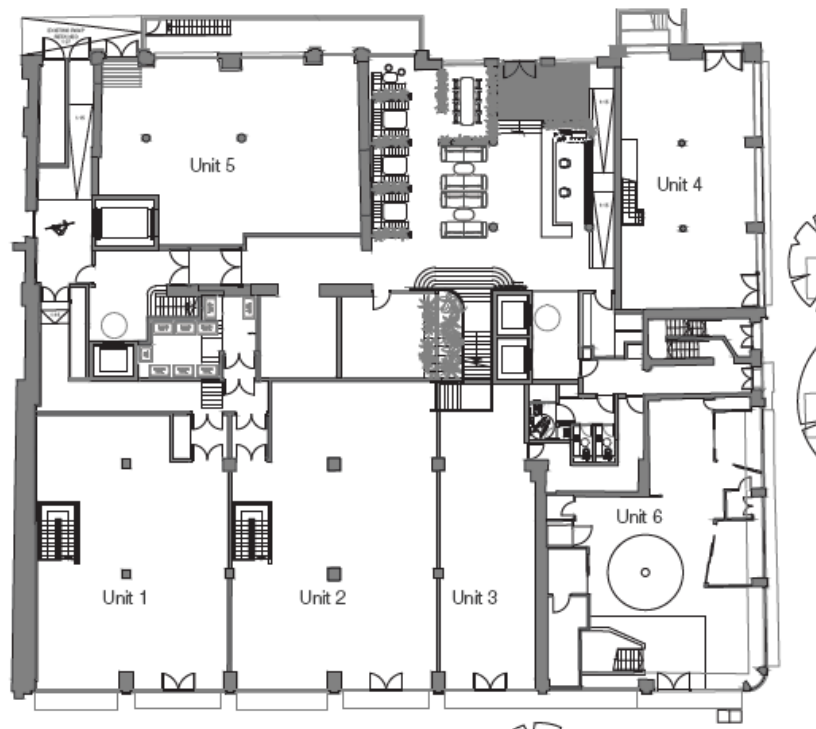


Figure 14 – Proposed ground floor plan featuring large reception area

- 9.43 The proposed fourth floor 'pavilion' provides more office space, and creates opportunity for valuable amenity at roof level, with terraces onto both east and west as well as associated plant for the building.
- 9.44 The infill of the terrace facing onto Alfred Place provides a positive addition to the street scene, and removing the glazed contemporary addition creates a sense of continuousness that is more in keeping with the materiality and form of the street.
- 9.45 The additional fourth floor is set back to maintain the prominence and definition of the existing building and creates external amenity space for occupants. The massing steps away from the west to reveal the raised cupola, making this the tallest element of the proposal and celebrating this feature.
- 9.46 The proposals present a contemporary response to the architectural expression found in the surrounding historic area. The proposed development incorporates design features which reference those within the surrounding townscape such as structured rhythm of openings; traditional brick material; detailing to windows; contrasting embellishment and variation in ground floor façade arrangement, reflecting uses.

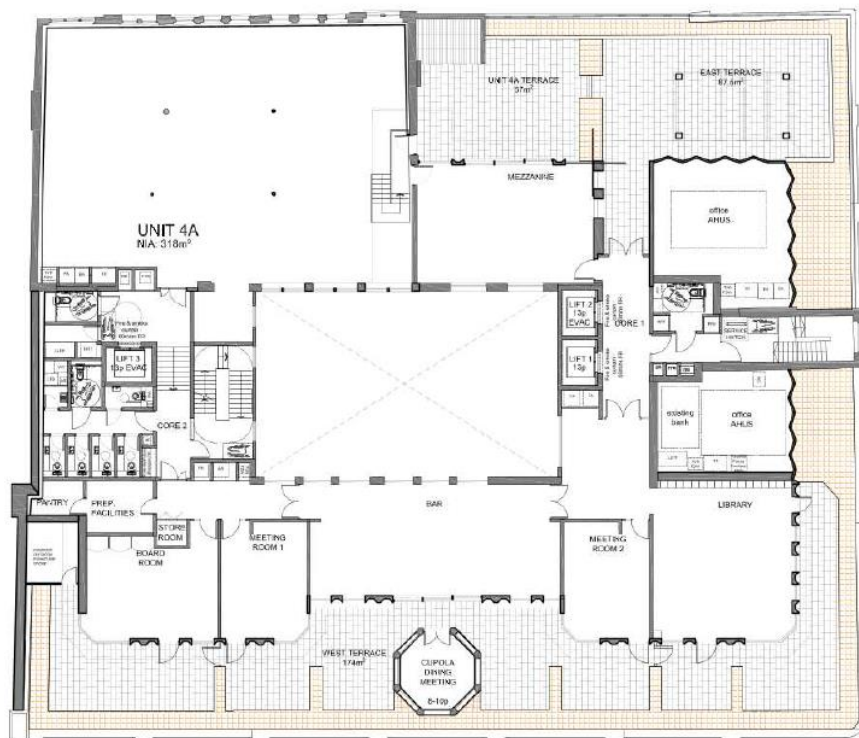


Figure 15 – Proposed fourth floor plan showing roof extension plus related amenity and landscaped areas

- 9.47 The infill to Alfred Place helps reinstate the rhythm of narrow building plots in a classical style and creates different types and scales of openings on each floor, imitating the playful yet ordered fenestration pattern found on the

existing building. Use of teal and white glazed bricks contrasts yet complements the existing colours found in the host building, and relates back to the teal pavilion, creating a distinction between what is new and what is old. The infill would be set back from the main building frontage to accentuate its separation from the historic fabric on either side and draw attention to its nature as a contemporary infill feature.

- 9.48 At ground floor, the infill reinstates a horizontal datum across the two elevations onto Alfred Place through introducing modern cornicing and reinforces the vertical pattern through four columns. A header bond of alternating glazed brick fills the top portion of the façade opening, with bronze framed glazing and bronze infill kickplate around half a meter off the ground, taking up the rest.
- 9.49 Arched windows and lintels, the use of brick and a Flemish bond to match existing brickwork in the area; the use of contrasting colour bands within the brickwork to express horizontal elements and arches; the expression of the parapet line through solid courses; these design features work together to complement the existing detailing on the host building and echo the wider context of the Bloomsbury Conservation Area.
- 9.50 The roof extension would be a lightweight structure and has a bold teal colouration that would highlight and respond to the colour found on the existing cupola. This also contrasts and complements the red colour of the brick, making it clear that this is a new addition to the building. Whilst contrasting, the new roof pavilion also creates visual harmony and connection to the host building, by aligning its openings with the facades and through the introduction of a protruding horizontal roofline that echoes the pronounced cornicing on the host building. This roofline projects over the main façade to provide shading to the terraced area. The façade treatment of the pavilion takes cues from the octagonal form of the cupola, creating undulating solid cladding elements that provide detail, texture and interest. The glazing system proposes bronze frames to match ground floor glazing.
- 9.51 The plant screen is functional in appearance and form but is set back from both the ground floor and the new pavilion level, thereby minimising its impact on the street scene. It would only be visible in very limited glimpses from public areas – mainly from Store Street and its colouration and materiality would match that of the roof extension it would be located above, which would further contribute to minimising its visual impact.

Design and Heritage Summary

- 9.52 It is considered that there is no harm arising to the Bloomsbury Conservation Area nor to the setting of any other heritage assets as the result of the proposed development, as described above. From a design perspective the development would be a well-considered and high-quality contemporary

addition to the building which accords with the character and appearance of the local area.

- 9.53 The proposal would create a high quality office and retail environment with active frontages that would be of benefit to users of the building and which would improve the passive surveillance and vitality of this Central London area.
- 9.54 Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the conservation area, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.
- 9.55 Special regard has also been attached to the desirability of preserving nearby listed buildings and their features of special architectural or historic interest, under s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.
- 9.56 Therefore, it is considered that the proposed development is acceptable in design and heritage terms.

10. SUSTAINABILITY AND ENERGY

- 10.1 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.
- 10.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, 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

- 10.3 The development aims to refurbish the existing building to provide high quality renewed office and retail accommodation, which includes significant improvements to the energy performance of the building. An approach has been proposed that focusses on the long-term benefits of carbon reduction. However, it is important to note that the prominent siting of the building in the conservation area, and its designation as a positive contributor, also means that the optimisation of the energy improvements has occurred with due consideration to heritage matters.
- 10.4 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.

10.5 In this case, the proposed development retains as much historic building fabric as possible, including internally, whilst also providing a holistic design solution that accords with local character and heritage context, and which enables significant improvements in the experiential quality of the internal environment including improvements to level access throughout the building, entrance security and welcome facilities and access to sustainable transport options.

10.6 The development aims to achieve resource efficiency through recycling and reuse of materials and as such a condition will be secured requiring a minimum of 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% or greater of demolition/strip out and construction waste will be diverted from landfill and put to beneficial use (condition 18).

Energy and carbon reductions

10.7 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). 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).

Total carbon reductions

10.8 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline for non-residential developments now already includes low carbon heating measures (such as ASHP) before the reduction is calculated.

10.9 For office extension and refurbishment schemes of between 500sqm and 1000sqm of new floor space, such as this, on-site carbon should be reduced as much as possible as part of every development proposal in accordance with Policy CC1 of the Local Plan. There is no specific percentage reduction target to meet and instead the requirement is to maximise reductions as far as possible.

10.10 The table below shows the level of carbon reduction the proposed development would achieve.

Table 8.3.3: reported CO₂ emissions for the Proposed Development (**site-wide**) after each stage of the Energy Hierarchy for Non-Domestic Buildings.

Energy Planning – Greater London Authority guidance on preparing energy assessment – Site Wide	Carbon Dioxide Emissions (Tonnes CO ₂ per Annum)		
	Regulated Energy	Total CO ₂ Reductions	Regulated Energy % Reduction
Building Regulations 2021 Part L Compliant Development	61.0	-	-
LEAN - After energy demand reduction	47.3	13.7	22%
CLEAN – After Clean Technology	47.3	0.0	0%
GREEN - After Renewable Energy	37.4	3.9	6%

10.11 In this case, using the up-to-date Part L 2021 carbon calculations, the development does not meet the carbon reductions policy target for major developments of a 35% reduction overall, achieving an overall on-site reduction of 28% below Part L requirements as shown in Table 8.3.3 above.

10.12 However, it is considered that, as noted above, this is likely to be down to the primarily refurbishment nature of the project and the difficulties for non-residential development in meeting these targets since the building regulations were updated, which is acknowledged by both the Council’s Sustainability Officer and the Greater London Authority. It is also relevant to note that this is not an application for major development and therefore the 35% policy target does not need to be met in this case.

Be lean stage (reduce energy demand)

10.13 London Plan policy SI 2 sets a policy target of at least a 15% reduction through reduced energy demand at the first stage of the energy hierarchy for commercial developments.

10.14 In this case, the development exceeds the policy target of 15% by reducing emissions by 22.5% at this stage through energy efficient design, in compliance with the development plan. The proposed development includes upgraded insulation and glazing, low energy lighting and energy efficient plant. The cooling hierarchy has been utilised to minimise overheating through measures such as green roofs, low heat LED lighting and the use of low G-value glazing on the higher levels. It is acknowledged that some active cooling (air conditioning) will be required due to the historic nature of the host building, which means that incursions into the building fabric such as reducing window sizes are not available to minimise heat gain in this case.

10.15 The proposal would include energy efficient mechanical ventilation systems with heat recovery to help keep the building at suitable temperatures. The central air handling units make use of integrated air source heat pumps to meet the baseline ventilation heating and cooling loads.

Be clean stage (decentralised energy supply)

- 10.16 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.
- 10.17 Principle 10 of the Fitzrovia Area Action Plan (FAAP) promotes connections to local energy networks, and states that a connection should be provided wherever this is feasible and viable.
- 10.18 It is important to note in this case that, although the proposed development includes a substantial refurbishment of the existing building, it is only a minor planning application.
- 10.19 An assessment of the existing London heat map has been made and there is an existing local network present within connectable range of the scheme. The network is part of University College London (UCL) and is specific to their UCL campus area. It broadly covers an area between Euston Road in the north and Torrington Place to the south. The applicant has contacted the operator of this network, and it is understood there are no current plans to extend the network closer to the site. As such, for the time being this existing heat network ends at a point more than 200 metres from the application site.
- 10.20 The Council's preference is for all large developments to connect to a local heat network and to be designed to secure such a connection in future, should there be a reasonable chance of this occurring, if that is not possible on first occupation of the development. However, in this case, noting that the only network in the area is currently more than 200 metres away from the site, given that the operator of the existing network does not plan to extend closer to the site in the near future, and given that there are no other networks proposed in the area, it is considered that a connection to a local heat network would not be feasible or viable at this time and thus cannot be insisted upon in for this development proposal.
- 10.21 The development would instead include a high efficiency decentralised heating and cooling system, which is considered acceptable in the circumstances. Furthermore, it is noted that there is no policy basis on which the Council can insist on a connection to a heat network, as this is a requirement for major developments only, as stated by Policy SI3 of the London Plan.
- 10.22 Although it is not possible to connect to a heat network immediately, the development would contribute towards enabling a future connection to the heat network by providing pipework that will enable a heat network

connection onto Alfred Place in the future. This potential future heat network connection will therefore be safeguarded by Section 106 legal agreement.

Be green stage (renewables)

- 10.23 Camden Local Plan Policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 10.24 In this case, the development fails to meet the policy target of 20%, reducing emissions by only 6% at this stage through renewables. The applicant has stated that they have maximised renewable energy generation on site and are heavily restricted by the structural limitations of the existing building, particularly given that additional floors are already being added to the roof, and also given the competing requirements to provide amenity space (in the form of terraces) for building users, storage for mechanical plant and space for green and blue roofs. The proposal includes the provision of PV panels on the roof.
- 10.25 The Council's Sustainability Officer accepts that these restrictions significantly limit the available space for PV panels and is generally supportive of the overall carbon reductions achieved, despite the development's lack of compliance with the policy target for renewable energy.
- 10.26 It is considered there may be more scope for photovoltaic panels at roof level through measures such as combining them with green/blue roofs. Further consideration of this matter can be adequately secured by condition (Condition 19) to bring the development closer to the 'be green' policy target, if that is possible.
- 10.27 Monitoring of the energy output from the development would be secured through Section 106 legal agreement.

Be seen (energy monitoring)

- 10.28 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 has committed to undertaking this reporting, which shall be undertaken via automated building management and energy monitoring equipment.
- 10.29 The Section 106 legal agreement will secure reporting to the GLA in line with their published guidance.
- 10.30 Summary

10.31 It is acknowledged that the development proposal falls below the policy targets for renewable energy provision on site and, had the proposed development been large enough (over 1,000sqm of new floor space) to be considered a major development it would also not have met the policy target as regards the overall carbon reductions from the scheme, when measured against the Building Regulations Part L 2021. However, as this is not a major development (988sqm of new floor space) the proposal is considered acceptable in terms of its carbon reduction measures overall as it is deemed to have maximised these, in accordance with Policy CC1 of the Local Plan. It is also acknowledged that the space available for PVs at roof level is heavily restricted given the competing requirements of the development and that non-residential developments typically struggle to meet the overall carbon reduction targets given the 2021 changes to the building regulations, which is an issue recognised by both the Council's Sustainability Officer and the GLA.

10.32 As such, it is considered that the proposed development is acceptable in terms of its carbon reduction measures.

Climate change adaption and sustainable design

10.33 Local Plan policy CC2 expects non-residential development to meet BREEAM Excellent and the application meets this requirement by achieving a target score of 79%. This will be secured through s106 legal agreement.

10.34 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.

Figure 11.5.2.1: Proposed Extent of Blue roof systems for the Proposed Development with 125mm depth systems (blue, red and green) and 165mm depth systems (orange) across the various roof and terraces spaces.

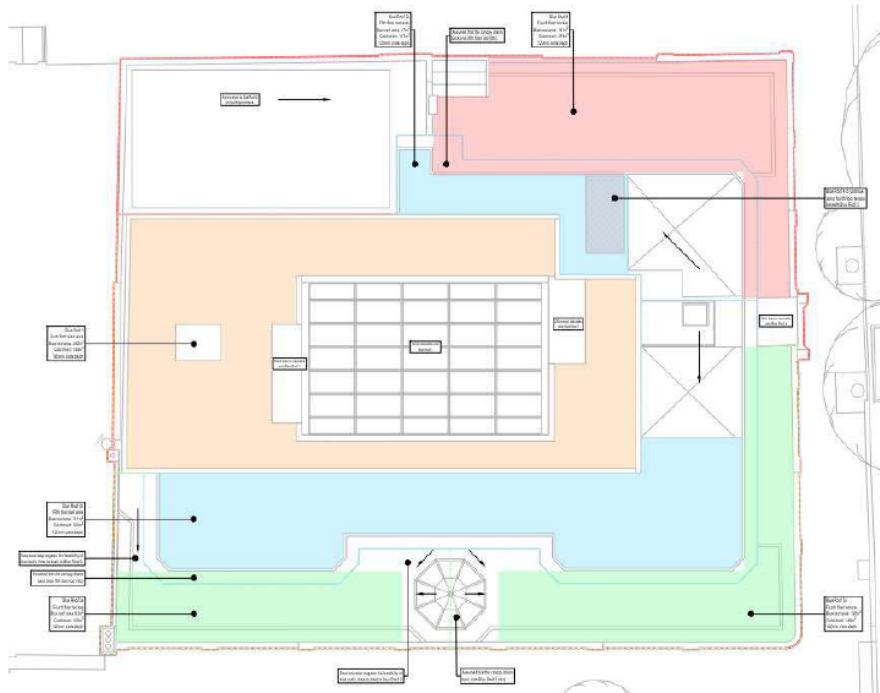


Figure 16 – Details of the green and blue roof areas.

- 10.35 The development incorporates SUDS in the form of 967sqm of green/blue roof provided at roof level, which includes a variation in substrate depth. This will minimise surface water runoff and maximise site greening and biodiversity. Further details can be secured by condition (Condition 17). The development would also incorporate grey water recycling and water efficient sanitary measures (Condition 20).
- 10.36 Flood risk is covered in more detail in the ‘Flood risk and drainage’ section of this report.

11. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 11.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation.
- 11.2 The supporting documentation indicates there was a single tree on site, within the recessed area accessible from Alfred Place, prior to submission of this application that has recently been removed. The photographs of this

area provided with the application show that there were two tree pits installed within this recess and recent photographs of the site show that there were indeed two trees located in this area.

- 11.3 Both trees were formerly characterful features that contributed to the greening of the local townscape. Though it is unfortunate that both trees have now been removed, it is understood that this would have been necessary in any case to facilitate the proposed development which will infill the site of these former trees with an extension. Both trees were understood to be Category C pear trees, and their trunk diameters were sufficiently narrow that they could be removed without notification to the Council in advance (less than 75mm at 1.5 metres from ground).



Figure 17 – Historic photo showing two small trees in the Alfred Place recess.

- 11.4 There is significant tree planting already in the local area, including on Store Street, Tottenham Court Road and a recently completed comprehensive public realm scheme on Alfred Place. However, there is space on these local streets for additional street tree planting. Additional street tree planting would therefore be secured by Section 106 legal agreement.
- 11.5 Existing trees on Store Street would need to be pruned to facilitate the proposed development. The Council's Tree Officer does not object to this pruning. Both intensive and extensive green roof areas are proposed at roof level in addition to the proposed areas of blue roof as described in the sections above. An urban greening factor (UGF) of 0.15 would be secured. This does not meet the 0.3 UGF factor for major developments but as this is a minor development proposal this does not constitute a failure to meet policy in the circumstances and it is instead welcomed that the development would secure an uplift in planting and biodiversity on site overall.

- 11.6 The Council's Tree Officer is in support of the proposal subject to conditions relating to tree protection, green roof quality and landscaping (Conditions 12 to 15).
- 11.7 The Council's Nature Conservation officer also supports the proposal subject to a condition that secures the biodiversity uplift recommendations as referenced in the submitted Ecological Impact Assessment – namely provision of two bat boxes, two swift boxes, two boxes for other birds, details of their installation, a landscape and ecology management plan, nesting bird protection measures and the removal of butterfly bush (an invasive species identified on the roof) from site. A relevant condition (Condition 16) would therefore be secured.
- 11.8 Given the above, the proposals are considered acceptable in terms of trees, greening and biodiversity in line with the development plan.

Statutory Biodiversity Net Gain

- 11.9 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 11.10 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.
- 11.11 This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits.
- 11.12 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this scheme will not require the approval of a BGP because it is below the *de minimis* threshold. This is because it does not impact an on-site priority habitat and impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero, and less than 5 metres in length of onsite linear habitat.
- 11.13 An appropriate informative will added to any planning permission, should it be granted.

12. AIR QUALITY

- 12.1 Camden Local Plan policy CC4 is relevant with regards to air quality. An Air Quality Assessment (AQA) has been undertaken and submitted as part of the sustainability documentation for this application.

- 12.2 The AQA included a desk study of local air quality which states that local air quality conditions are suitable for office and retail use without further mitigation requirements. Air inlets for the heating and cooling equipment would be from Alfred Place and not from the much busier Tottenham Court Road where local air quality is lower. Internal areas that typically have lower air quality such as kitchens and the bin store will exhaust to roof level.
- 12.3 The proposals would be car free and the impact on local traffic activity would be negligible. Energy and hot water would be provided without the use of combustion plant and the back-up power supply for the proposed building would be via battery or a separate electrical connection and not a diesel generator. As such, the development would be neutral in terms of its transport and operational air quality impacts.
- 12.4 Air quality impacts from construction works shall be monitored by condition (Condition 9). More information on this is available in the Transport section below.

13. FLOOD RISK AND DRAINAGE

- 13.1 Policy CC3 is relevant with regards to flood risk and drainage. The site is located within a Flood Zone 1, which is an area that is least likely to flood. The site is at low risk of fluvial, tidal and groundwater flooding. The level of potential surface water flooding is also not significant in this area.
- 13.2 The development would include sustainable drainage systems at roof level in the form of blue and green roofs to minimise water run-off. These have been described in the sections above. The surface water drainage system has been designed such that there is no flooding on site for the 1 in 100-year storm event plus an appropriate allowance for climate change. All water flows for such events will be contained safely within the site boundary. All new drainage has been designed to protect the building from sewer surcharge.
- 13.3 Thames Water have not objected to these proposals and the Council's Lead Local Flood Officer also raised no objections subject to a condition (condition 17) that secures the proposed run off rate of 8.93l/s for 1 in 100yr (+40% for climate change) and clarifies the details of the SUDS measures.
- 13.4 As such, the proposed measures are considered acceptable in terms of flood risk and drainage.

14. TRANSPORT

Policy context

- 14.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit

the availability of car parking and requires all new developments in the borough to be car-free.

- 14.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.
- 14.3 Camden's Transport Strategy (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets our objectives, policies, and measures for achieving this goal.
- 14.4 The Council's priorities include:
- (a) increasing walking and cycling
 - (b) improving public transport in the Borough
 - (c) reducing car ownership and use
 - (d) improving the quality of our air
 - (e) making our streets and transport networks safe, accessible, and inclusive for all
- 14.5 On 13th November 2024, Camden Council's Cabinet agreed to implement the next phase of [CTS for 2025 to 2028](#), investing in more environmentally friendly, healthier forms of travel and creating more welcoming streets and neighbourhoods. The strategy includes commitments, all of which are pertinent to this application, and which will be expanded upon in later sections, to:
- (a) implement proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists via the Holborn Liveable Neighbourhood (HLN) scheme.
 - (b) develop a comprehensive network of electric vehicle charge points (EVCPs) that both responds to existing demand for EV infrastructure and provides for and accelerates the uptake of cleaner vehicles in the future, in line with our [Electric Vehicle Charging Point Action Plan](#).
 - (c) continue to expand our dockless bike and e-scooter hire network, and
 - (d) to contribute towards the implementation of the CTS Cycling Action Plan, Walking and Accessibility Action Plan, and Road Safety Action Plan.
- 14.6 Camden's Clean Air Action Plan and Climate Action Plan also contain policies which are relevant to our transport observations.
- 14.7 London Plan 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% per cent of all trips in central London to be made by foot, cycle, or public transport by 2041, and 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 context

- 14.8 The site is bounded by Alfred Place to the northeast, Store Street to the southeast and Tottenham Court Road to the southwest. Tottenham Court Road forms part of the Strategic Road Network (SRN). The Council is the highway authority for this road and is therefore responsible for its 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.
- 14.9 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6B (excellent). Goodge Street London Underground Station is located approximately 180 metres north of the site. Tottenham Court Road London Underground Station, which also offers Elizabeth Line services, is located approximately 450 metres south of the site.
- 14.10 The site is easily accessible from the Strategic Cycle Network, with Cycleway C10 to the east on Bloomsbury Street providing access to Euston station. The nearest Santander cycle hire docking station is located on Store Street directly opposite the property. This nearest dedicated parking bays for dockless rental e-bikes and rental e-scooters are located on Chenies Street to the north, and Bayley Street to the south of the development. These bays are already showing signs of overcapacity and increasing demand.
- 14.11 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander bicycles, E-scooters, and Cycle Hire bays. The STAL analysis shows grades of 4 and 5 in the vicinity of the site, which indicates opportunities for improvement, considering it is the Council's aspiration (and target) for the STAL score to be 6b. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.

Trip generation

- 14.12 The TRICS database was used to derive the anticipated office person trip rates. There would be a net uplift in person trips generated by the proposed office redevelopment as the result of the additional floor space provided. The majority of trips will involve public transport and active travel.

- 14.13 Based on other developments in the area, it is anticipated that a high volume of the walking trips are likely to be made from Goodge Street and Tottenham Court Road London Underground Stations, nearby bus stops, and commercial, entertainment, shopping, and restaurant venues in the Holborn area. Given this increase in active travel to and from the site, the applicant has agreed to provide a financial contribution of £80,000 towards a number of public realm improvements in the local area as well as pedestrian, cycle and environmental improvements.

Cycle parking

- 14.14 The existing units do not benefit from any cycle parking provision and as such the proposed arrangements constitute a significant improvement on the existing situation.
- 14.15 In total there would be 75 long-stay cycle parking spaces provided. The ground floor uses will have a shared cycle store for seven long-stay spaces at basement level, except for the Store Street unit which will have its own two long-stay spaces provided internally. This level of provision is in line with London Plan minimum standards for new developments.
- 14.16 A dedicated office cycle store with 66 cycle spaces will be provided at basement level, comprising of 44 x two-tier spaces i.e. 22 two-tier racks (67%); 12 x Sheffield spaces i.e. 6 stands (18%); 6 x foldable bike lockers (9%); and 4 x accessible/larger spaces (6%). The long-stay office cycle parking provision does not fully meet the London Plan requirements for the proposed office space of 93 spaces, however the proposal is considered a significant improvement on the existing situation and is therefore acceptable. Transport for London are also supportive of the proposed cycle parking arrangements.
- 14.17 Access to the basement cycle stores and facilities would be via the shared cycle / goods lift, which is not the preferred solution. However, the cycle store would be a significant improvement on the size and quality of the existing cycle facilities, with a good mix of stands including accessible stands provided, and lockers, showers, changing rooms and a repair station available. This is likely to maximise take-up of cycling amongst occupiers of the development and as such is considered acceptable.
- 14.18 In terms of short-stay cycle parking, there are already on-street cycle parking spaces locally, including the Santander cycle stand opposite the site on Store Street, which are able to cover a relatively small amount (two) of additional short stay visitor cycle parking demand arising from the increase in office floor space from this proposed development.

Car Parking

- 14.19 The site is located in the controlled parking zone CA-E Bloomsbury Area, which operates 08:30-18:30 Monday to Friday and 08:30-18:30 on Saturday. The development is proposed as car-free, which would be secured by legal agreement.
- 14.20 London Plan Policy T6.5 requires all non-residential developments to provide access to at least one on or off-street disabled persons parking bay. The Council's Transport CPG requires disabled car parking on-site and also notes that the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site.
- 14.21 'National disability, accessibility and blue badge statistics: 2021 to 2022' published on 18 January 2023, reports that on 31 March 2022, 4.3% of the population held a Blue Badge.
- 14.22 Therefore, it is considered appropriate to seek an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location within 50m from the site given the lack of disabled parking proposed on-site.
- 14.23 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 in the controlled parking zone. The uptake of electric vehicles is increasing significantly in the local area. There are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Officers therefore suggest that an additional electric vehicle charging point (fast charger) be provided on the public highway in the general vicinity of the site. A financial contribution of £10,000 will therefore be secured by legal agreement.

Micro and shared mobility improvements

- 14.24 The dockless rental e-bike/e-scooter bays located nearby provide capacity only for usage by existing residents and people who work in or visit the area. The Council is aiming to expand the network of dockless rental e-bike/e-scooter bays, car club bays, and electric vehicle bays in the area, noting the STAL grades locally, the likely rise in demand for such modes from this proposal, and wider aims to relieve pressure on and support existing public transport modes.
- 14.25 As such, it is appropriate that additional bays are secured through a financial contribution of £10,000 secured via s106 legal agreement.

Travel planning measures

- 14.26 A framework travel plan aimed at staff and visitors was submitted in support of the planning application, which shows the proposed development would

be encouraging and promoting trips by sustainable modes of transport. The targets for active travel are acceptable. More detailed Workplace Travel Plan measures, and an associated monitoring contribution of £11,348, has been secured by S106 legal agreement.

Pedestrian, cycling and environmental improvements

- 14.27 The Council is developing proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists.
- 14.28 This development proposal, in line with the anticipated increase in walking and cycle trips expected to be generated by it and further promoted by the requested Travel Plan, has secured a financial contribution of £80,000 through s106 legal agreement towards implementing public realm improvements in the local area.

CPZ Review

- 14.29 As stated above the site is within the Bloomsbury Area CA-E CPZ. Camden's Controlled Parking Zones (CPZ) Review final report, which was published in February 2023, independently appraised all of Camden CPZs using a multi-criteria assessment. The findings show that there is a greater need to manage parking demand in the borough through the hours of CPZ controls. The CPZ Assessment Results show that CA-E CPZ performed poorly in terms of the impact of its current hours of control in helping manage demand. The review recommends, amongst others, that the CA-E hours of operation are extended subject to consultation and decision-making processes.
- 14.30 At present, the CA-E CPZ control hours do not extend into the evening, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This has a potential to increase on-street parking pressure which may drive demand for CPZ reviews.
- 14.31 The CTS 3 Year Delivery Plan for 2025-26 to 2027-28 states that during this period the Council will continue to review Controlled Parking Zones, beginning with undertaking reviews of CA-C, CA-D and CA-E and exploring with stakeholders ideas to extend parking hours of control and/or size of zones/sub-zones. Given the scale and the location of the proposed development, a contribution has been secured for £15,000 towards this CA-E CPZ review.

Construction management

- 14.32 A draft Construction/Demolition Management Plan using the Council's CMP pro-forma has been provided in support of the planning application. However, in absence of a principal contractor, the document lacks some of

the necessary detail. The Council must be assured that the development would not significantly add to traffic congestion, adversely affect public safety or lead to local amenity issues. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed with Camden Council.

- 14.33 The development will require input from Council officers at demolition and construction stage. This guidance 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. As such, a detailed CMP document can be secured by legal agreement. Implementation support contributions of £30,513 and a construction impact bond of £32,000 for the demolition and construction phases of the development works will be also secured by legal agreement, as will a necessary requirement to set up and manage a construction working group consisting of representatives from the local community prior to commencement of any demolition or construction works.
- 14.34 The extensive demolition and construction works proposed could damage to the public highway. A highways contribution of £20,000 would be secured by legal agreement if planning permission is granted.

Deliveries and servicing

- 14.35 A Delivery and Servicing Plan (DSP) was provided with the application. Servicing activity will remain in line with the existing arrangements, utilising the loading bays on Tottenham Court Road and Alfred Place. Waste would be collected from Alfred Place as per the existing situation. Machinery would be needed to help waste operatives drag bins to Store Street as the distance from the collection location to the street would exceed the maximum permitted. The Council's Waste Officer does not object to this collection arrangement. In order to secure appropriate long-term management of delivery and servicing arrangements and related mitigation measures if necessary a detailed DSP will be secured by S106 legal agreement.

Summary

- 14.36 The proposal is acceptable in terms of transport implications subject to the securing of planning obligations through s106 legal agreement, as described in the paragraphs above.

15. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 15.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is more than 1,000sqm or £3mill construction costs. To ensure local people benefit from these opportunities in line with Local Plan Policy E1, the Economic

Development Team will work with the developer to deliver several benefits from the development.

- **Apprenticeships** - the applicant will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs (or every 1,000sqm GIA newbuild) with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's Euston Skills Centre.
- **Construction Work Experience Placements** - the applicant should provide two construction work placement opportunities of not less than 2 weeks, to be undertaken over the course of the development construction. This would be recruited through the council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.
- **Local Recruitment** - the applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than a week before the roles are advertised more widely.
- **Local Procurement** - the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area. The Economic Development Team will liaise and assist with the developer to provide details of local suppliers and subcontractors.

15.2 The above measures would be included in a package of Employment and Training measures secured by s106 agreement in accordance with CLP policy E1 and the CPG.

16. COMMUNITY INFRASTRUCTURE LEVY (CIL)

16.1 The CIL applies to all proposals which add 100m² of new floorspace. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.

16.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of **£49,000** (988sqm x £50). Indexing has not been applied to this figure.

16.3 The proposal will also be liable for the Camden Community Infrastructure Levy (CIL). The site lies in Zone A (central) where CIL is calculated using rates based on the relevant proposed uses. The estimated Camden CIL liability is **£108,680** (988sqm x £110). Indexing has not been applied to this figure.

17. CONCLUSION

- 17.1 The application is a commercial development for partial demolition and extension of the existing building to provide refurbished office and retail space including an extension at roof level and an infilled rear elevation. In total, the application proposes 8,324sqm of non-residential floorspace including an uplift in floorspace uplift of 988sqm.
- 17.2 The proposed land uses are similar to those already on the site and in the local area. The amount, density and quality of the office uses on site would increase and the increased number of modernised Class E uses at ground floor would improve the activation of surrounding streets, and the vitality and viability of the existing commercial frontages, including for the Central London Frontage on Tottenham Court Road. The proposed development cannot incorporate housing and as such a financial contribution in line with policy would be provided in lieu of this on-site housing provision, secured through Section 106 agreement.
- 17.3 The development proposal would partially demolish, refurbish and extend a building that is a positive contributor to the Bloomsbury Conservation Area. Demolition would be kept to a minimum and would only occur to improve the quality and functionality of the refurbished internal accommodation, including to facilitate connections between three formerly separate buildings, and to improve the appearance of the building from public areas. There would be no harm to the conservation area and as such it is considered the proposed development would preserve the character and appearance of the Bloomsbury Conservation Area and would not negatively impact the setting of other nearby heritage assets.
- 17.4 The proposed development would have high-quality architecture demonstrated through its well-considered composition and detailing and as such it would improve character and appearance of the host building and the surrounding area. The refurbishment of the ground floor commercial units would improve their viability and vitality and bring greater activity onto local streets thus supporting the Central London Area commercial district.
- 17.5 The proposed development has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight, outlook and privacy. The proposed end uses would also not create significant levels additional noise disturbance.
- 17.6 The proposed development would be car-free and would support sustainable transport methodologies through the provision of a quality purpose-built cycle parking area and through the provision of financial contributions in support of local transport and public realm improvements, to be secured through Section 106 legal agreement.

- 17.7 The proposed development includes energy efficiency and thermal improvements to the existing building including the addition of air source heat pumps, PV panels, green/blue roofs and other building upgrades meaning that it meets the overall minimises energy demand and is BREEAM 'excellent'.
- 17.8 Construction and demolition work necessary for this proposed development would be required to adhere to a detailed demolition/construction management plan, supported by appropriate financial contributions secured through Section 106 legal agreement, which would protect the amenity of nearby residents and minimise the impact on the local public realm.
- 17.9 The scheme complies with the development plan as a whole and therefore is recommended for approval, subject to conditions and a Section 106 legal agreement.

Public benefits

- 17.10 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.
- Effective re-use of a currently vacant building that contributes positively to the Bloomsbury Conservation Area.
 - Increased density of employment space.
 - Permanent jobs on-site and temporary jobs construction.
 - Apprenticeships and work experience placements.
 - Improved energy efficiency, site greening and surface water retention
 - Provision of dedicated cycle parking and financial contributions towards wider sustainable transport improvements.
 - Financial contribution towards public realm improvements.

18. RECOMMENDATION

- 18.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:
- Affordable Housing Payment in Lieu of £741,000
 - Construction Management Plan and Implementation Support Fee of £30,513
 - Construction Management Plan Impact Bond of £32,000
 - Highways Contribution of £20,000
 - Construction Working Group
 - Delivery and Servicing Plan
 - Car Free Development
 - Disabled Parking Space Contribution of £4,000
 - Electric Vehicle Charging Point Contribution (Fast Charge) of £10,000

- CPZ Review Contribution of £15,000
- Off-site Micromobility Parking Contribution of £10,000
- Workplace Travel Plan and Monitoring and Measures fee of £11,348
- Pedestrian Cycling and Environment contribution of £80,000
- Energy and Sustainability Report
- 'Be Seen' Energy Monitoring
- Future Heat Network Pipework Connection Plan
- Street Tree Planting (2 x Trees)
- Employment and Training Measures
 - 10 Construction Apprentices and Associated Support Fee of £1,700 per Apprentice (£17,000)
 - Two Work Experience Placements
 - Local Recruitment (Target of 20% of Workforce, Working with Euston Skills Centre)
 - Local Procurement (Target of 10% of Value of Construction Contract, Camden Local Procurement Code)

19. LEGAL COMMENTS

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

20. CONDITIONS

1. *Time limit*

The development hereby permitted must be begun not later than three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. *Approved drawings*

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Drawings:

TCB-EMR-ZZ-B1-DR-A-00101 PL02
TCB-EMR-ZZ-00-DR-A-00102 PL02
TCB-EMR-ZZ-01-DR-A-00103 PL02
TCB-EMR-ZZ-02-DR-A-00104 PL02
TCB-EMR-ZZ-03-DR-A-00105 PL02
TCB-EMR-ZZ-04-DR-A-00106 PL02
TCB-EMR-ZZ-RL-DR-A-00107 PL02
TCB-EMR-ZZ-ZZ-DR-A-00108_Elevation 1 PL02
TCB-EMR-ZZZ-ZZ-DR-A-00109_Elevation 2 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-00110_Elevation 3 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-00111_Elevation 4 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-00112_Section AA PL01
TCB-EMR-ZZZ-ZZZ-DR-A-00113_Section BB PL02
TCB-EMR-ZZZ-ZZZ-DR-A-01101 PL01
TCB-EMR-Z00-B01-DR-A-02101 PL03
TCB-EMR-Z00-000-DR-A-02102 PL02
TCB-EMR-Z00-001-DR-A-02103 PL01
TCB-EMR-Z00-002-DR-A-02104 PL01
TCB-EMR-Z00-003-DR-A-02105 PL01
TCB-EMR-Z00-004-DR-A-02106 PL01
TCB-EMR-Z00-005-DR-A-02107 PL01
TCB-EMR-Z00-R01-DR-A-02108 PL01
TCB-EMR-ZZZ-ZZZ-DR-A-04101 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-04102 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-05101_Elevation 1 PL01
TCB-EMR-ZZZ-ZZZ-DR-A-05102_Elevation 2 PL01
TCB-EMR-ZZZ-ZZZ-DR-A-05103_Elevation 3 PL01
TCB-EMR-Z00-B01-DR-A-70201 PL02
TCB-EMR-Z00-000-DR-A-70202 PL01
TCB-EMR-Z00-001-DR-A-70203 PL01

TCB-EMR-Z00-002-DR-A-70204 PL01
TCB-EMR-Z00-003-DR-A-70205 PL01
TCB-EMR-Z00-004-DR-A-70206 PL01
TCB-EMR-Z00-R0L-DR-A-70207 PL01
TCB-EMR-ZZZ-ZZZ-DR-A-70401 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-70402 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-70403 PL02
TCB-EMR-ZZZ-ZZZ-DR-A-70404 PL02
Swept Path Analysis Plan Drawing TR002
Existing Highway Arrangement Drawing 001 Rev A
65211993-SWE-Z00-B01-DR-P-03100 Rev P02 drainage plan
65211993-SWE-Z00-005-DR-P-03106 Rev P02 drainage plan
65211993-SWE-Z00-004-DR-P-03105 Rev P02 drainage plan
65211993-SWE-Z00-003-DR-P-03104 Rev P02 drainage plan
65211993-SWE-Z00-002-DR-P-03103 Rev P02 drainage plan
65211993-SWE-Z00-001-DR-P-03102 Rev P02 drainage plan
65211993-SWE-Z00-000-DR-P-03101 Rev P02 drainage plan
65211993-SWE-C01-005-DR-ME-08208 Rev P02 plantroom layout
65211993-SWE-C01-005-DR-ME-08209 Rev P02 plantroom layout

Documents:

Energy and Sustainability Strategy Rev 01, dated 2 February 2025
Plant Screen Updates, dated 14 February 2025 (to follow)
Sustainable Drainage Strategy, dated 7 January 2025
Greenfield run off rates, dated 7 January 2025
Existing Brownfield run-off rates, dated 7 January 2025
Indoor Air Quality Plan, dated 19 September 2024
Additional Viewpoint 4, dated 4 December 2024
Air Quality Assessment Rev 02, dated 10 December 2024
Planning Fire Safety Strategy, dated 13 December 2024
Arboricultural Impact Assessment, dated 28 October 2024
Ecological Impact Assessment, dated 23 October 2024
Planning Noise Report, dated 25 October 2024
Design and Access Statement, dated 24 October 2024
Planning Statement, dated 25 October 2024
Cover Letter, dated 25 October 2024
Draft Delivery, Servicing & Waste Management Plan, dated October 2024
Transport Statement, dated October 2024
Biodiversity Net Gain Exemption Letter, dated 17 October 2024
BREEAM Travel Plan, dated October 2024
Draft Construction Management Plan, dated October 2024
Pre-demolition Audit, dated 23 October 2024
Daylight Sunlight Report, dated 23 October 2024
Urban Greening Factor Assessment, dated 10 October 2024

Built Heritage Statement including Visual Impact Appraisal (VIA), dated October 2024.

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

3. Detailed design drawings and samples

Notwithstanding the details shown on the approved plans, prior to commencement of the relevant part of the approved works (and other than demolition and site clearance), 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 before the relevant part of the work is begun:

- a) Detailed drawings including plans, coloured elevations and sections of all windows (including jambs, head and cill), external doors, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20;
- b) Plan, coloured elevation and section drawings of the new shopfronts at a scale of 1:20;
- c) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details; and
- d) Typical details of railings and balustrades at a scale of 1:20, including method of fixing.

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the Camden Local Plan 2017.

4. Use times (hours of operation)

The premises (other than the Class E(g)(i) office use) hereby permitted shall not operate other than within the following times:

0730 Hours to 2300 Hours – Monday to Friday

0730 Hours to 2300 Hours – Saturdays

0800 Hours to 2230 Hours – Sundays, Bank Holidays and Public Holidays.

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.

5. *No audible music played on terrace*

No music shall be played on the approved terraces in such a way as to be audible within any adjoining premises or on the adjoining highway.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, D1, A1, and A4 and TC1 and TC2 of the London Borough of Camden Local Plan 2017.

6. *Crossrail 2*

The development hereby permitted shall not be commenced until detailed design and construction method statements for all the ground floor structures, foundations and basements and for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Local Planning Authority which:

- (i) Accommodate the proposed location of the Crossrail 2 structures including tunnels, shafts and temporary works,
- (ii) Accommodate ground movement arising from the construction thereof,
- (iii) Mitigate the effects of noise and vibration arising from the operation of the Crossrail 2 railway within the tunnels and other structures.

The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i), (ii) and (iii) of this condition shall be completed, in their entirety, before any part of the building is occupied.

Reason: In accordance with Policy T3 of the Local Plan 2017 which seeks to protect and enhance the Borough's transport infrastructure.

7. *Noise levels*

The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained.

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.

8. *Anti-vibration*

Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

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.

9. *Air monitoring*

No demolition or development shall commence until all the following have been complied with:

- a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. 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;
- b) A confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details; and
- 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.

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.

Reason: Development must not commence before this condition is discharged 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 Camden Local Plan 2017 and policy SI1 of the London Plan.

10. Generator

No diesel generator is to be installed on site without prior written consent of the Local Planning Authority.

Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017, and policy GG3 and SI 1 of the London Plan.

11. NRMM

No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).

Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017, and policy GG3 and SI 1 of the London Plan.

12. Tree protection

Prior to the commencement of any works on site, details demonstrating how trees to be retained shall be protected during construction work shall be submitted to and approved by the local planning authority in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the London Borough of Camden Local Plan 2017.

13. Landscaping

Prior to the commencement of the relevant part of the development details of hard and soft landscaping and means of enclosure of all un-built, open areas must have been submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.

14. Landscaping maintenance

All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.

15. Green roofs

Prior to commencement of the relevant part of the above-ground development, full details in respect of the green roof in the area (at least 519.6m² – including 139 m² of intensive green roof and 380.6 m² of extensive green roof) indicated on the approved roof plan shall be submitted to and approved in writing by the local planning authority.

Details of the green roof provided shall include: species, planting density, substrate and a section at scale 1:20 showing that adequate depth (expected to be at least 150mm for substrate at the intensive green roof) is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green roof. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the London Borough of Camden Local Plan policies.

16. LEMP

Prior to the first occupation of the development hereby approved details of ecological mitigation, enhancement and monitoring shall be submitted to the Local Planning Authority for its written approval in the form of a Landscape and Ecology Management Plan (LEMP). The LEMP shall include the following information, as explained on ps.24-25 of the submitted Ecological Impact Assessment:

- a) Confirmation of timing of works outside of nesting season or an appropriate nesting bird check
- b) Removal of butterfly bush from the site
- c) Provision of 2 x bat tubes or equivalent
- d) Provision of 2 x swift eco habitats or equivalent
- e) Provision of 2 x sparrow terraces or equivalent
- f) Details of monitoring proposed for the first five years of development.

Elevational drawings, brochure details and other supporting information as appropriate shall be submitted as part of the LEMP.

Once approved the development shall be carried out in accordance with the approved details.

Reason: To improve the biodiverse nature of the site in accordance with Policy A3 of the Camden Local Plan 2017 and the Council's Biodiversity SPG 2018.

17. *SUDS details*

Prior to commencement of above-ground development, full details of the sustainable drainage system including blue/green roofs with 119.41m³ combined storage capacity shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to the run-off rate of 8.93l/s for 1 in 100yr +40% for climate change approved by the Local Planning Authority. An up-to-date drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including:

- a) The proposed SuDS or drainage measures including storage capacities
- b) The proposed surface water discharge rates or volumes
- c) Drainage drawing showing the outfall to the sewer, with any control points indicated.
- d) The design of the green roof including at least 150mm substrate depth.

- e) Evidence of Thames Water approval regarding the proposed connection should be provided.
- f) Proposed mitigation measures to resist potential flooding from surface water.
- g) Provides a Flood Risk Emergency Plan.

Systems shall thereafter be retained and maintained in accordance with the approved details.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017 and Policy SI 13 of the London Plan 2021.

18. Construction/demolition waste management

Prior to commencement of development, a waste management plan shall be submitted demonstrating how 95% of construction and demolition waste will be reused/recycled/recovered and 95% of excavation waste used for beneficial purposes. The plan shall thereafter be delivered in accordance with the approved details.

Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the London Plan 2021.

19. Solar PV maximisation

Prior to commencement of development other than site clearance & preparation, a feasibility assessment with the aim of maximising the provision of solar photovoltaics and green/blue roofs should be submitted to the local planning authority and approved in writing. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities and contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local plan Policies

20. Greywater recycling

Prior to commencement of development other than site clearance & preparation, details of greywater recycling proposals should be submitted to the local planning authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.

21. High speed digital infrastructure

Prior to the first occupation of the development hereby approved there shall be provided to the Council for its written approval written confirmation that a high-speed digital infrastructure connection has been made available for the occupiers of the business accommodation located on site.

Reason: To provide high quality digital infrastructure in accordance with the requirements of policy E1 of the London Borough of Camden Local Plan 2017.

22. No additional fixtures

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 or any subsequent or superseding orders, no lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the building, without the prior approval in writing of the local planning authority.

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.

21. INFORMATIVES

1. Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

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

3. 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).

4. Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.

5. All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at <https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319> or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444).

6. 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.

7. This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.

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

9. Transport for London is prepared to provide to information about the proposed location of the Crossrail 2 tunnels and structures. It will supply guidelines about the design and location of third party structures in relation to the proposed tunnels, ground movement arising from the construction of the tunnels and noise and vibration arising from the construction and use of the tunnels. Applicants are encouraged to discuss these guidelines with the Crossrail 2 engineer in the course of preparing detailed design and method statements.

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

11. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan.

The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.

Based on the information provided, this will not require the approval of a BGP before development is begun because it is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).

++ Summary of transitional arrangements and exemptions for biodiversity gain condition

The following are provided for information and may not apply to this permission:

1. The planning application was made before 12 February 2024.
2. The planning permission is retrospective.
3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.
4. The permission is exempt because of one or more of the reasons below:
 - It is not “major development” and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.
 - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).
 - The application is a Householder Application.
 - It is for development of a “Biodiversity Gain Site”.
 - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding).
 - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).

12. + Irreplaceable habitat:

If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.

++ The effect of section 73(2D) of the Town and Country Planning Act 1990

If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission (“the earlier BGP”), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.

++ Phased development

In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.

















Existing Tottenham Court Road elevation



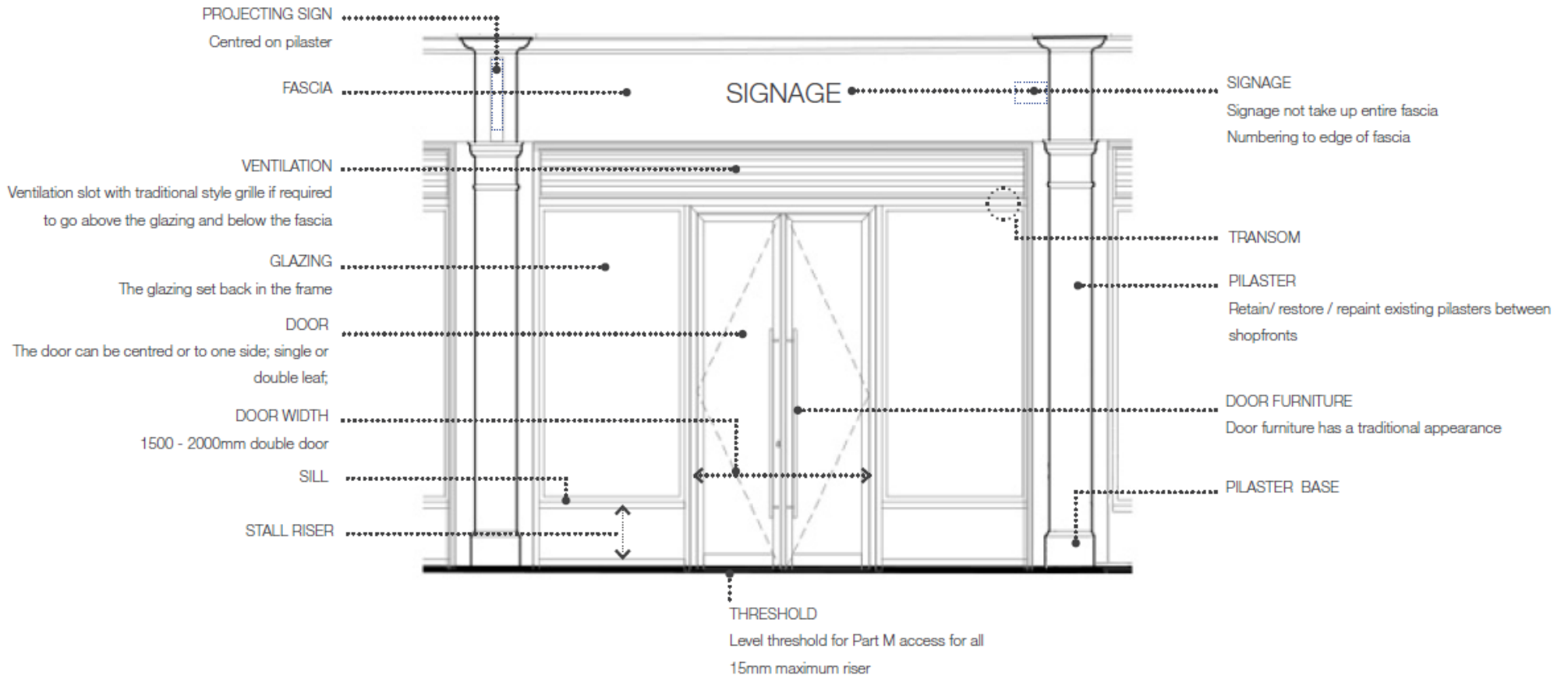
Proposed Tottenham Court Road elevation



Existing Alfred Place elevation



Proposed Alfred Place elevation

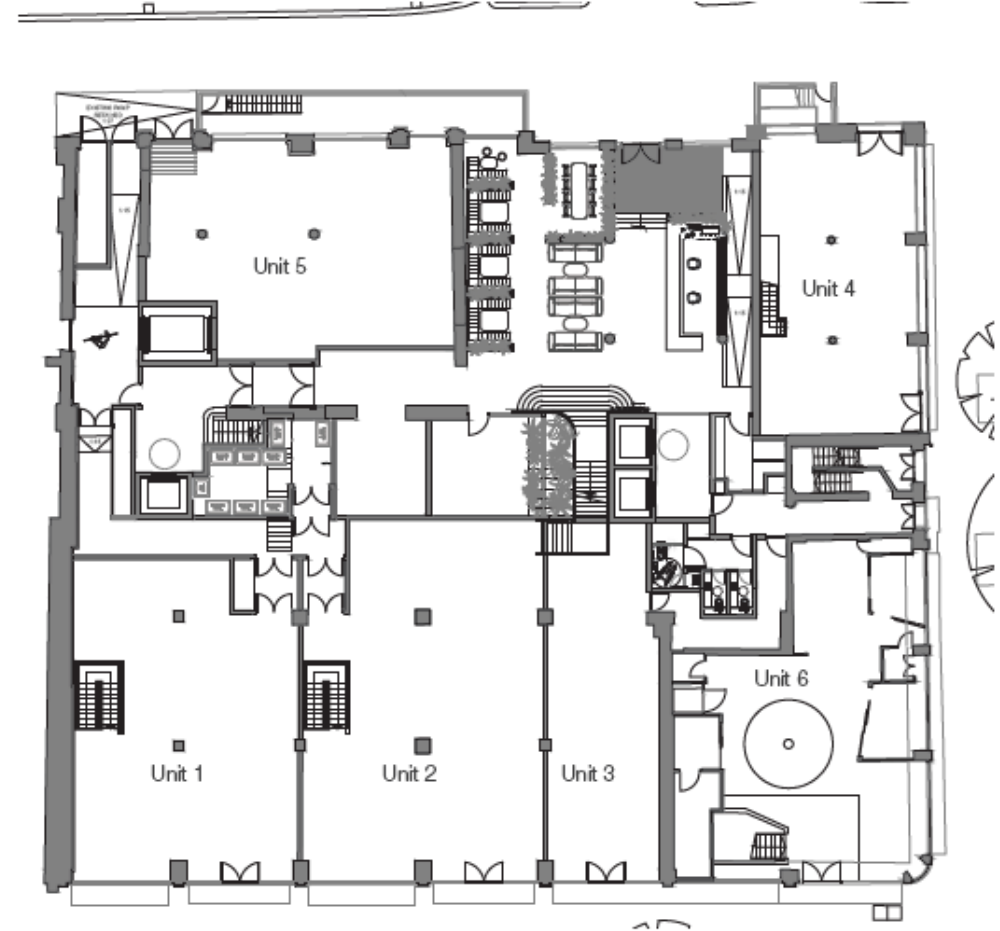




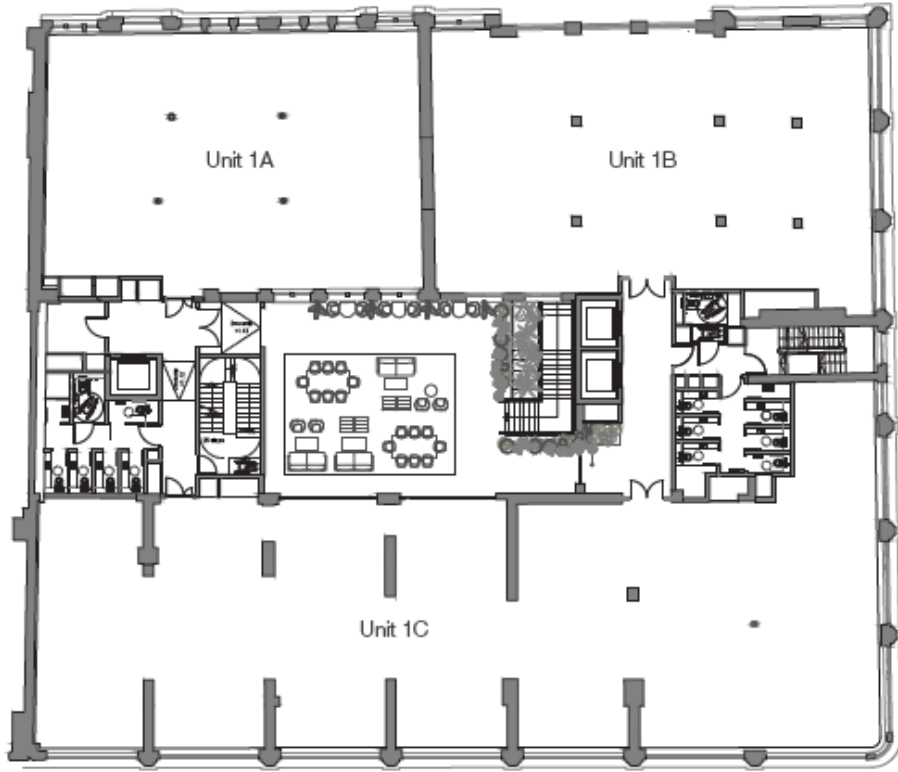




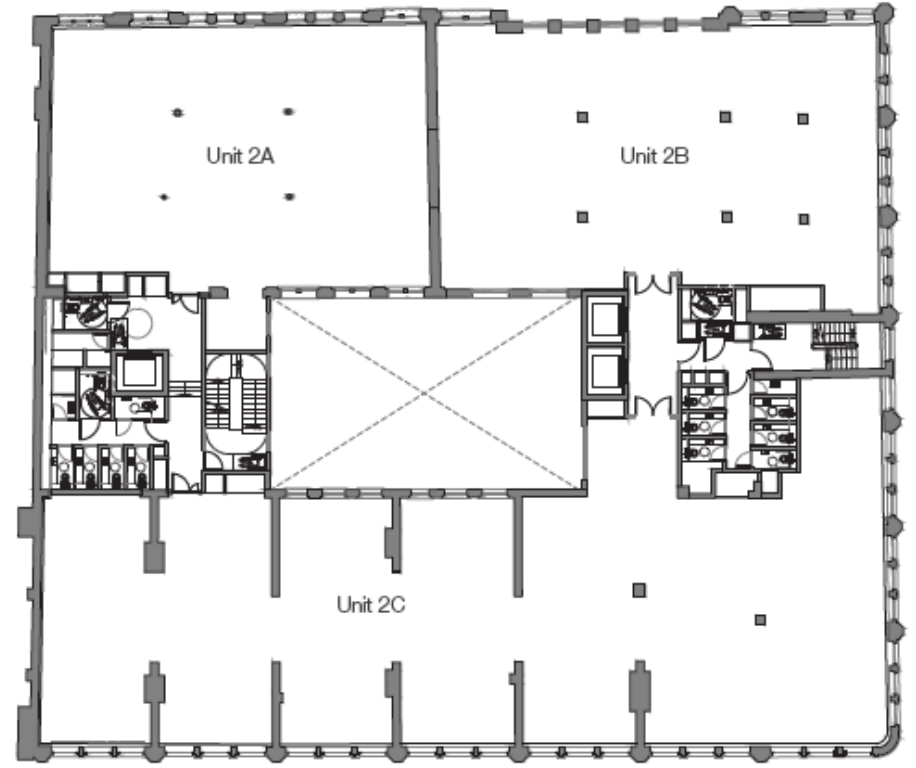
Proposed basement plan



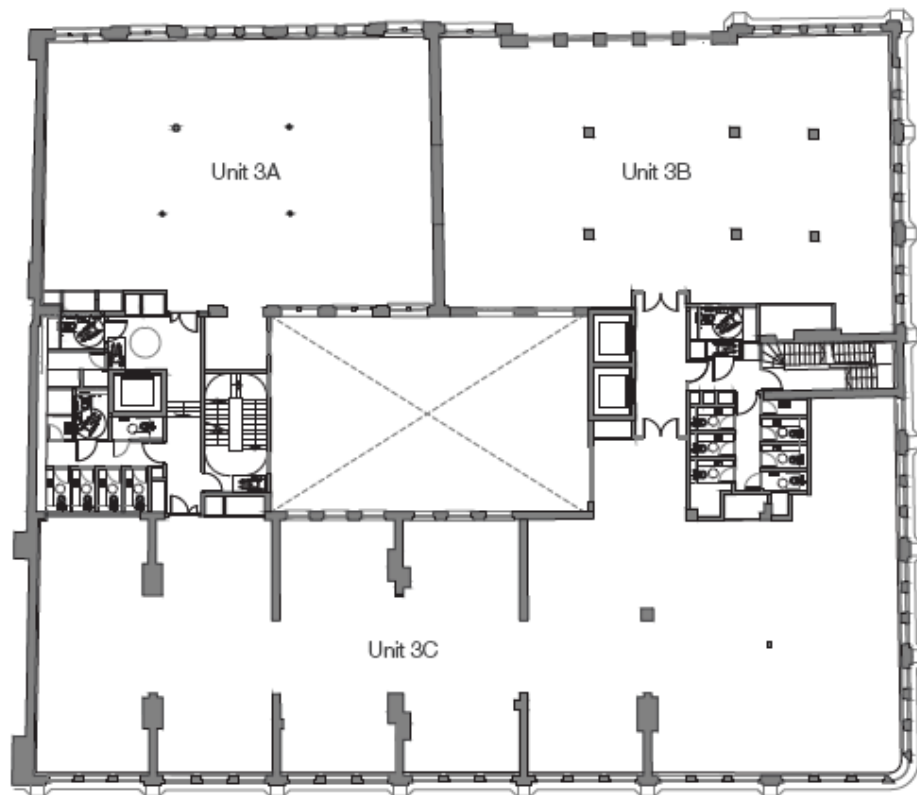
Proposed ground floor plan



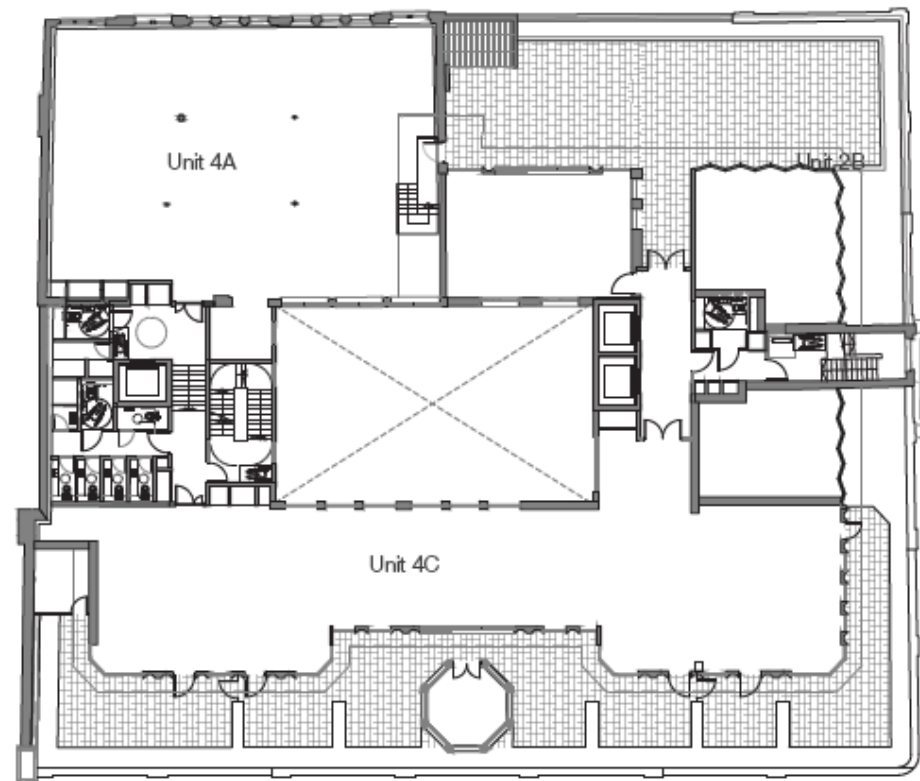
First floor plan



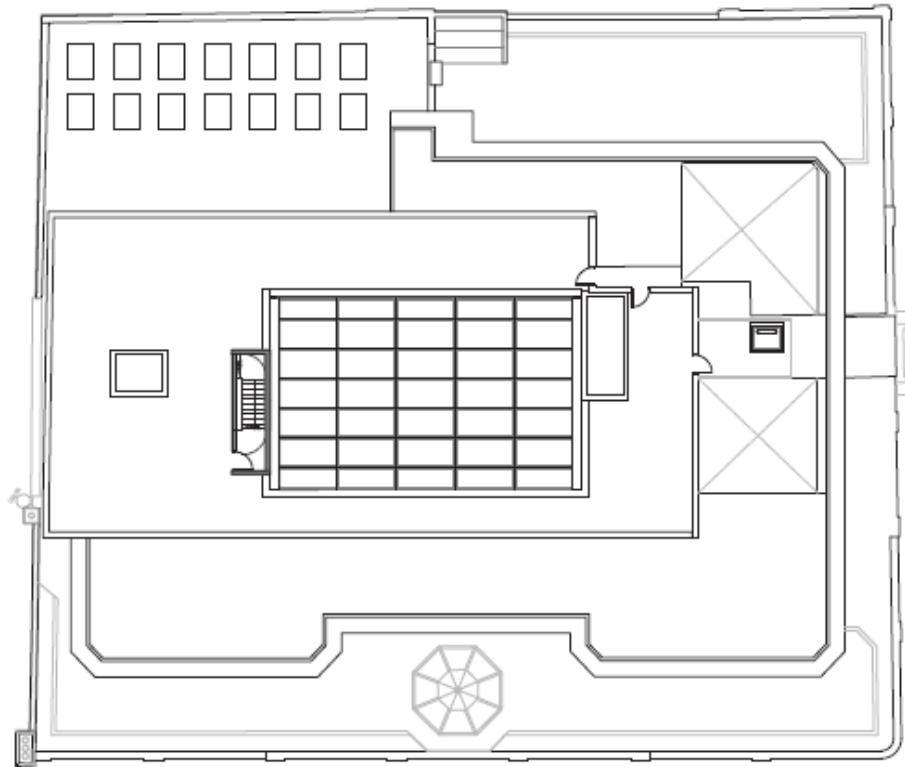
Second floor plan



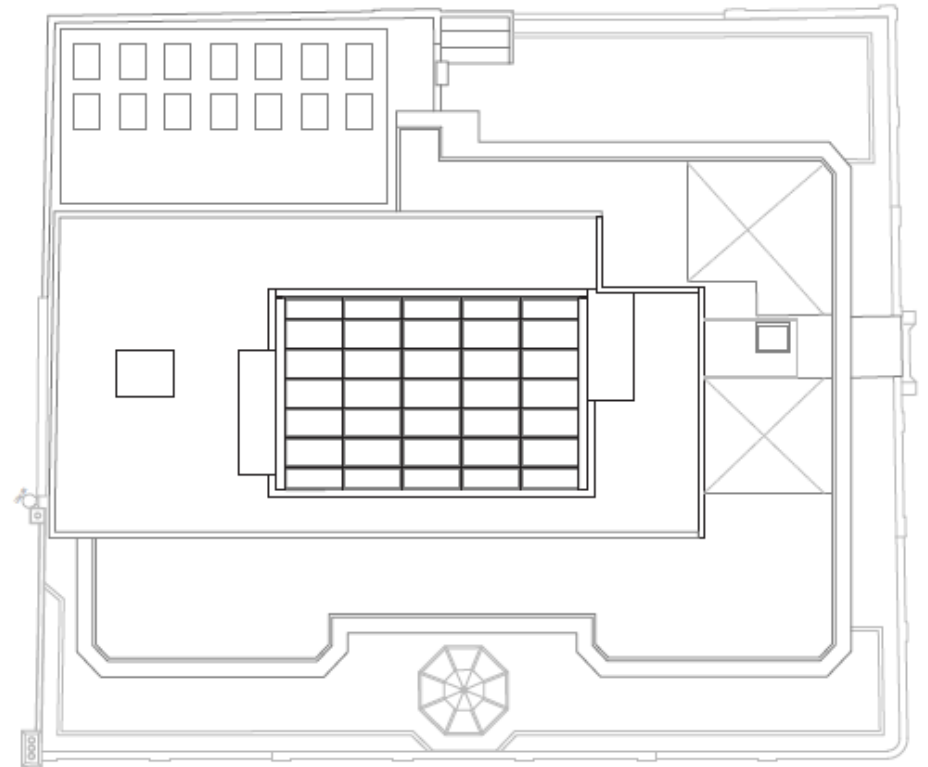
Third floor plan



Fourth floor plan



Fifth floor plan



Roof plan