

Address:	212-214 High Holborn London WC1V 7BW		2/3
Application Number(s):	i) 2018/3833/P ii) 2018/3834/L	Officer: Sam FitzPatrick	
Ward:	Holborn & Covent Garden		
Date Received:	25/07/2018		
Proposal:	<p>i) Alterations and extensions to existing building including: demolition at mezzanine and fourth floor levels; removal of modern additions at basement, ground, first, second, and third floor levels; construction of six storey rear extension above ground floor level to provide an increase in office (Class E) floorspace.</p> <p>ii) Internal refurbishment and alterations to layout; demolition of listed building at mezzanine level and fourth floor level; partial demolition of listed building including removal of modern additions at basement, ground, first, second, and third floor levels; construction of six storey above ground floor level rear extension.</p>		
Background Papers, Supporting Documents and Drawing Numbers:			
<p>Existing Drawings: (8918-): L01; L02; L03; L04; L05A; L06; L07D; L08C; L09A; P09.</p> <p>Demolition Drawings: (8918-): P25B; P26B; P27A; P28A; P29A; P30D; P31; P32; P33A; P34; P35A.</p> <p>Proposed Drawings: (8918-): P11D; P12G; P13D; P14D; P15D; P16D; P17E; P18H; P19F; P20F; P21G; P22H; P23E; P24E; Green/Blue Roof Proposal (prepared by Studio Moren).</p> <p>Documents: Sustainability and Energy Statement Revision A (prepared by JS Lewis, dated November 2024); Structural Assessment Ref: 2892-16_Rev.C (prepared by Partington & Associates Ltd, dated 23/06/2018); Transport Statement and Framework Travel Plan Ref: TR001_V1.3 (prepared by WSP, dated June 2018); Heritage Statement Ref: 2941 (prepared by Heritage Collective, dated May 2018); Design and Access Statement (prepared by Cassidy & Ashton, dated June 2018); Daylight and Sunlight Study (prepared by Right of Light Consulting, dated 29/06/2018); Daylight and Sunlight Report (Neighbouring Properties) (prepared by Right of Light Consulting, dated 29/06/2021); Archaeological Desk-based Assessment (prepared by Thames Valley Archaeological Ref: HHL16/205 (TQ 3046 8149), dated December 2016); Air Quality Assessment Ref: EGE_170_Rev.D (prepared by Eden Green Environmental, dated 05/09/2018); Ventilation Filtration Statement (prepared by Project 23, dated 28/09/2018); Planning Statement Addendum (prepared by Savills, dated July 2019); Email from Savills dated 16/07/2019; Floor area Schedule (unnumbered) received 06/09/2019; Cycle Storage details (unnumbered) by Falco.</p>			
RECOMMENDATION SUMMARY:			

i) Grant conditional planning permission subject to a Section 106 Legal Agreement ii) Grant conditional listed building consent	
Applicant:	Agent:
Austringer Capital Limited	Savills 33 Margaret Street London W1G 0JD

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Class E	Commercial, business and service	1,316	2,549	+ 1,233
Class E	Ancillary staff flat	80	0	- 80
Total	All uses	1,396	2,549	+ 1,153

EXECUTIVE SUMMARY

- i) The application is for the refurbishment and extension of the existing building at the application site, in order to facilitate its use for commercial purposes. The building is Grade II listed and has been vacant for a number of years, with some areas of the site (such as the upper levels) having been vacant for a longer period of time prior to the application being submitted. The existing building is four storeys high (plus basement) and formerly operated as a bank, with offices above and an ancillary residential unit. It is situated within the Bloomsbury Conservation Area.
- ii) The proposal seeks to remove the existing roof extension, erect a six storey extension to the rear, and make internal alterations. It would result in an uplift of 1,153 sqm, and the building would fall entirely under Class E use, with a retail unit to the front at basement, ground, and mezzanine levels, and office space making up the rest of the site. The main building and historic front elevation would largely remain as existing, and the rear extension would be constructed with a contemporary design, predominantly of glazing, aluminium, and terracotta tiling.
- iii) Due to the uplift of 1,153 sqm, the development is required to contribute to housing in accordance with policy H2, however due to the constraints of the site it is accepted that on-site delivery is not possible and there is no donor site available, so the policy will be met in the form of a payment-in-lieu, totalling £864,750 which represents the full policy compliant amount.

- iv) The proposed works are considered to preserve the significance of the listed building, as well as the character and appearance of the conservation area. There would also be no harm to neighbouring or nearby heritage assets.
- v) Although the increase in height and massing would result in a reduction in daylight and sunlight to the closest neighbouring residential properties, the impacts are considered acceptable; the impacts are largely localised to the lower levels of the neighbouring building, which itself is built very close to the site boundary line, and the affected rooms would mostly already not meet BRE guidelines. Additionally, the building is located in a dense urban environment that is characterised by short distances between buildings and tight grain, so the impact is not considered to be so great as to result in significant harm to residential amenity. Otherwise, most surrounding buildings are commercial, and there are not considered to be significant impacts on amenity in terms of other considerations, such as privacy, outlook, noise, or disturbance.
- vi) The development would not result in harm to the local transport network or infrastructure subject to the recommended conditions and S106 obligations and the development would also provide a sustainable development which meets local and regional energy and sustainability policies. The proposal would also deliver an employment and training package that would provide a number of economic benefits to residents of the borough, including affordable workspace provision in the form of a designated area of floorspace with discounted rent, two construction apprentices with support fee, two construction work experience placements, a target of ten end use work experience opportunities, end use apprentices (such that two are employed at any one time), and a contribution of £28,189 towards employment and training initiatives within the borough.
- vii) In summary, the proposal provides a number of public benefits and would comply with the development plan as a whole. As such, it is recommended that planning permission and listed building consent are granted, subject to conditions and a Section 106 legal agreement to secure planning obligations.

OFFICER REPORT

Reason for Referral to Committee:

The construction of a building or extension resulting in an increase of more than 500 sqm of non-residential floorspace [Clause 3(ii)].

1. SITE AND BACKGROUND

Description

- 1.1 The application site is located on the south side of High Holborn, just west of the intersection with Kingsway and directly south of Southampton Place. It consists of a Grade II listed building set over the basement, ground, mezzanine, and four upper floors of nos.212-214, and is located within the Bloomsbury Conservation Area (sub-area 8), immediately abutting the Kingsway and Seven Dials Conservation areas. The site forms part of the defined Central London Area, a Central London Frontage, and adjoins the boundary of the Holborn Growth Area.

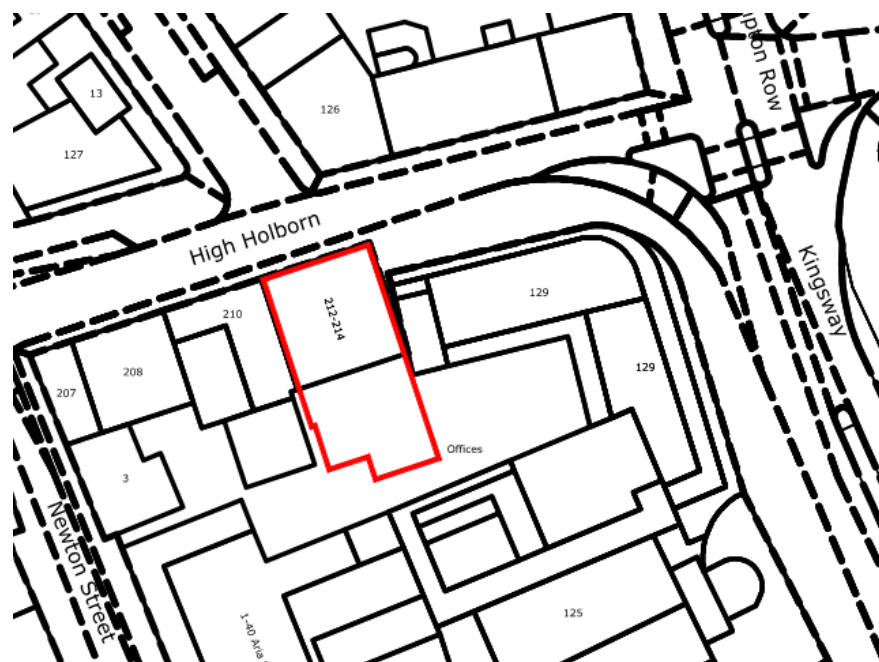


Figure 1: The application site

- 1.2 The site covers an area of approximately 0.0437 hectares (437sqm), and is highly accessible by a range of sustainable transport modes, with a PTAL rating of 6b (excellent); less than 100m directly to the east of the site is Holborn Underground Station, with Tottenham Court Road, Russell Square, Chancery Lane, and Covent Garden all within an approximate 10 minute walk. It is located within the Crossrail Area, and a London Suburbs Archaeological Priority Area. The surrounding area is largely commercial in nature, though Aria House to the south (rear) contains 40 residential flats.

- 1.3 The building comprises a total of five storeys (with basement); the basement, ground, and mezzanine of the existing building was most recently occupied by offices for Natwest bank (now Use Class E), but has been vacant since 2022. The remaining office floorspace at first, second, third, and fourth floor level (Use Class E) has been vacant for in excess of 10 years. As such, the site is considered to almost entirely fall under Class E use.
- 1.4 It should be noted that there is a small residential unit at the site, located within the third and fourth floor extension of the building. Although permission was granted for this residential unit in 1986, it would appear that its use was never occupied as a private self-contained dwelling but rather used as ancillary to the bank use, with the accommodation available for the manager of the bank. It also does not benefit from rational access, as it is not accessible other than through a shared entrance with the commercial units. Its use is therefore accepted by officers to have always remained as purely ancillary to the main office use of the building. As with the rest of the upper levels of the site, the residential unit has been vacant for an extended period of time.
- 1.5 The property forms one of a group of mid-to-late 19th century developments with classically influenced details on the southern side of High Holborn, though the area is mixed in terms of its overall height, age, and design of properties. The immediately adjacent property to the east is seven storeys high, largely glazed, and has a curved block with a frontage wrapping on to Kingsway. No.210, which adjoins the site to the west, is identified as a positive contributor to the conservation area; it is a 20th century stone faced bank building of seven storeys (including roof additions), with large vertical openings on the upper floors subdivided by metal spandrel panels and the roof level is accentuated by gables. However, it is noted that the building has been largely extended with modern additions to the rear.
- 1.6 The application site has a prominent street frontage, and is visible in long views predominantly along Southampton Place (facing the frontage), but also in views along High Holborn. To the rear of the building, the site is currently occupied by a large single storey extension at ground level, which extends to the rear boundary of the site. The rear extension provides a small courtyard, but this cannot be used as a service yard due to the lack of access to any highway, having been blocked off by buildings at all sides. At the upper levels, a third storey rear addition and fourth storey roof extension were consented and constructed in the 1980s, which provided additional office space and the aforementioned residential unit.

2. THE PROPOSAL

Background

2.1 It should be noted that this application was originally received in 2018. Since submission, the application has been revised to amend the design of the rear extension by setting back the fifth and sixth floors, so the levels are largely detached from the main listed building. Following this, a recommendation to grant planning permission was not able to be made, as the applicant objected to the planning obligations that were sought, and attempted to demonstrate that the proposal would not be viable whilst these were required. After a process involving independent viability surveyors BPS, the applicant has since agreed to pay the financial obligations as required.

Proposed development

2.2 It is proposed to bring the site back into use as a commercial building through significant external and internal alterations, including the erection of a six-storey extension to the rear of the building, the replacement of the existing roof extension, and reconfiguring the internal layout. These works would all be in order to facilitate the commercial use of the building, all under Class E use, and would include the removal of a small residential unit at third and fourth floor level. In total, the proposals would involve an uplift of 1,153 sqm gross internal area (GIA).

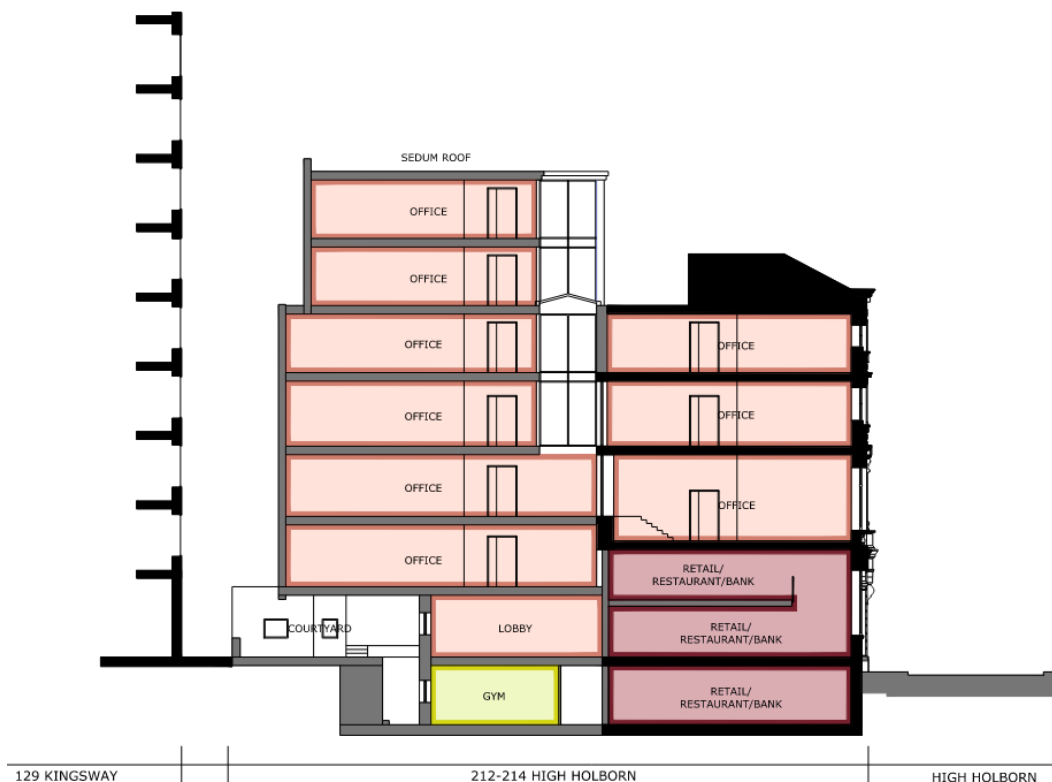


Figure 2: Section of application site with proposed extension (n.b. the areas annotated as 'lobby', 'gym', and 'courtyard' are roughly the location and massing of the existing rear additions).

2.3 At basement level, alterations would be solely internal, and would involve removing existing partitions to create a retail unit to the front of the site, with

an ancillary gym and changing rooms to the rear, associated with the office use above.

- 2.4 Similarly, at ground floor level no external alterations are proposed. The ground floor would be subdivided to create space for the aforementioned retail unit to the front of the site (the basement and the ground levels would be linked with a spiral staircase). To the rear of the site, ancillary space for the rest of the building would be located, including a lobby area, corridors, and cycle storage. This would be accessed through the pre-existing entrance at no.212 towards the west of the frontage (fronting High Holborn), while the retail unit would use the existing entrance to the east of the frontage also fronting High Holborn, which previously served the Natwest bank.
- 2.5 The existing mezzanine would be demolished and replaced with an extended mezzanine to cover much of the footprint of the building and the new rear extension, with the exception of a 2.9m setback from the internal front elevation of the building, creating a void. The rest of this level would accommodate additional floorspace for the retail unit (also accessed by the spiral staircase) and office floorspace.
- 2.6 Above mezzanine level, the existing parts of the building would remain mostly unchanged, including in terms of plan form, though there would be the removal of some partitions at third floor level to form a more open plan office. At the rear of the building, the new extension would be constructed, which would be up to approximately 15m in depth and would continue up to fourth floor level. The extension would have an open plan internal layout and would have a slightly reduced depth at the fourth and fifth floor, where the rear of the extension would be pulled in by approximately 1.2m. The fourth floor modern roof extension would be removed, reinstating a more complete roof form to the front of the site, with a flat roof located behind. A roof terrace would be introduced to the flat roof, set between the front traditional roof form and the modern extension to the rear.
- 2.7 The frontage of the main building would largely remain as existing, however the rear element would be finished in large aluminium curtain walling with terracotta rainscreen cladding. The front elevation of the fourth and fifth floors of the rear extension would have a dark grey aluminium finish too, though there would be limited visibility due to the setback from the main building and height difference between the two parts of the site. The rear extension would also have a green roof above.

3. RELEVANT HISTORY

The site

- 3.1 **2022/4528/P** – Removal of existing fascia signage, projecting sign and ATMs and reinstatement of stonework to front façade. **Planning permission granted 10/03/2023 and implemented.**

- 3.2 **2022/5128/L** – Removal of existing fascia signage, projecting sign and ATMs and reinstatement of stonework to front façade. Internal works including removal of all non-original furniture, fixtures and fittings relating to the bank use. **Listed building consent granted 10/03/2023 and implemented.**
- 3.3 **2020/1922/L** – Refurbishment of failed roof coverings and associated reinstatement of internal building fabric suffering from water damage. **Listed building consent granted 02/09/2020 and implemented.**
- 3.4 **8501862** – Alterations and extensions involving: 1. The erection of a rear extension at third floor level for office usage; 2. The provision of a new residential unit at third and fourth floor level. **Planning permission granted 30/04/1986 and implemented.**
- 3.5 **8570338** – Alterations and extensions involving: 1. The erection of a rear extension at third floor level for office usage; 2. The provision of a new residential unit at third and fourth floor level; 3. Internal alterations involving the formation of a lift shaft and toilet areas. **Listed building consent granted 30/04/1986 and implemented.**

The area

210 High Holborn (adjoining west)

- 3.6 **2022/0696/P** – Installation of plant at roof level and associated grilles. **Planning permission granted 07/06/2022.**
- 3.7 **8900188** – Demolition behind retained store facade to High Holborn frontage and redevelopment of building providing retail accommodation on part ground and basement floors with offices on part ground and basement and the whole of first to sixth floors. **Planning permission granted 08/08/1989.**
- 3.8 **8800209** – Demolition behind retained stone facade to High Holborn frontage and redevelopment of building providing retail accommodation on part ground and basement floors with offices on part ground and basement and whole of 1st to 6th floors. **Planning permission granted 29/09/1988.**
- 3.9 **8870083** - Demolition behind retained stone facade to High Holborn frontage. **Listed building consent granted 29/09/1988.**

193-197 High Holborn (approx.100m to west)

- 3.10 **2018/3874/P** – Erection of fifth floor rear roof extension (southwest side of the building) incorporating new roof terrace to provide additional commercial accommodation, installation of 2 x roof top plant areas with 9 air condition units and 1 heat pump, installation of roof light, replacement enclosure of lift overrun and associated external servicing pipework.. **Planning permission granted subject to a Section 106 legal agreement 05/06/2019.**

- 3.11 **2018/4545/L** – Erection of fifth floor rear roof extension (southwest side of the building) incorporating new roof terrace to provide additional commercial accommodation, installation of 2 x roof top plant areas with 9 air condition units and 1 heat pump, installation of roof light, replacement enclosure of lift overrun and associated external and internal servicing pipework. **Listed building consent granted 05/06/2019.**

4. CONSULTATION

- 4.1 It is noted that this proposal was originally consulted on when first received, in August 2018. Following the revisions and due to the length of time since original consultation (see 'background' in section 2 of this report), the application was reconsulted on in June 2024, with site and press notices reissued.
- 4.2 No additional responses were received from members of the public or external consultees, and the following summarises the responses received in respect of the latest response from each consultee.

Statutory consultees

Historic England

- 4.3 Historic England confirmed that they would not be expressing any views on the merits of the proposals and authorised the Council to determine the application for listed building consent as seen fit.

Greater London Archaeological Advisory Service (GLAAS)

- 4.4 GLAAS responded to note that the planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: London Suburbs. Whilst the archaeological desk-based assessment provides a detailed assessment of the archaeological potential of the site, it was noted that the submission did not provide sufficient detail on the type of groundworks required for enabling or during the development. Following clarification that groundworks and foundations would have limited and localised impacts, GLAAS advised that an archaeological watching brief would be sufficient to mitigate the archaeological impact, and requested the following condition to be secured this:

- “No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and:
 - A) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;

B) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015."

Transport for London (TfL)

4.5 TfL were consulted on the application, and whilst the Infrastructure Protection Team did not raise any objection in principle to the proposed works, the Spatial Planning Team objected. Their respective comments are summarised below.

Infrastructure Protection Team

4.6 No objection but potential constraints of site are noted due to close proximity to underground tunnels and infrastructure. The following condition is therefore requested:

- "The development hereby permitted shall not be commenced until detailed design, method statements and load calculations (in consultation with London Underground), have been submitted to and approved in writing by the local planning authority which:
 - a) Provide a technical submission that demonstrates that there will be no impact on the Central Line tunnels through ground movement from any change of loading."

Spatial Planning Team

4.7 Objected to the application due to a number of issues, noting that these could be resolved through additional information and amendments, rather than the objection being an objection in principle. Their objections are summarised:

- The provision of cycle parking is inadequate and does not meet the minimum standards set out in the London Plan – a minimum of 20 long-stay and 9 short-stay cycle parking spaces should be provided. The applicant should also consider future-proofing the development by increasing provision to 39 long-stay and 12 short-stay spaces.
- The Construction Management Plan is lacking in detail and a proper assessment cannot be made. A Construction Logistics Plan should be produced with TfL's template and secured by condition.
- The servicing arrangement does not make clear how deliveries and servicing will be conducted and managed. A Delivery and Servicing Plan

should be provided, which could be secured by condition rather than provided beforehand.

- The site is within the Central London charging area wherein Section 106 contributions for Crossrail will be sought.

Officer response: It is noted that the amount of cycle parking has changed since original consultation due to revisions to the scheme. Additionally, given the length of time that has passed since the original period of consultation and this recommendation, Crossrail has now been completed. As such, the Crossrail contribution no longer applies. All other concerns relating to transport are covered in section 11 of this report.

Crossrail

- 4.8 Crossrail were consulted on the application and did not object to the proposal, however noted that due to the site's position within the limits of land subject to consultation under the Safeguarding Direction, the implications of the Crossrail proposals for the application have been considered and the detailed design of the proposed development needs to take account of the construction of Crossrail. The following conditions are recommended should the Council be minded to grant planning permission:

Crossrail condition for foundation design, noise, vibration, and settlement

- "None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of 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 structures including tunnels, shafts, and temporary works;
 - (ii) Mitigate the effects of noise and vibration arising from the operation of the Crossrail railway within the tunnels and other structures;
 - (iii) Mitigate the effects on Crossrail, of ground movement arising from development.

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 1(i), 1(iii) and 1(iv) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied."

Crossrail condition for concurrent working

- "None of the development hereby permitted shall be commenced until a method statement has been submitted to, and approved in writing, by the Local Planning Authority to include arrangements to secure that, during any period when concurrent construction is taking place of both the

permitted development and of the Crossrail structures and tunnels in or adjacent to the site of the approved development, the construction of the Crossrail structures and tunnels is not impeded.”

Officer response: Given the length of time that has passed since the original period of consultation and this recommendation, Crossrail has now been completed. As such, conditions relating to impact of concurrent construction or accommodation of proposed Crossrail structures are not considered necessary. Additionally, the nature of the proposal and lack of excavation mean that it is not considered reasonable to secure the conditions as suggested by Crossrail.

Thames Water

- 4.9 Thames Water responded to confirm that no objection was raised with regards to waste water network and waste process infrastructure capacity. Similarly, no objection was raised with regards to surface water drainage, but it was advised that where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. It was also noted that the applicant should incorporate measures to avoid the risk of backflow during storm conditions, and that the developer should demonstrate what measures would be undertaken to minimise groundwater discharges into the public sewer.

Officer response: Informatives have been included as part of this recommendation to cover the concerns raised by Thames Water.

Councillors or MPs

- 4.10 None.

Local groups

Bloomsbury CAAC

- 4.11 The Bloomsbury Conservation Area Advisory Committee were consulted on the application, but no response was received.

Adjoining occupiers

- 4.12 As noted above, the application was advertised in both August 2018 and June 2024. Both times, five sites notice were displayed, located outside the site in all directions, including on High Holborn, Newton Street, and at multiple points on Kingsway. The notices were displayed on 29/08/2018 until 22/09/2018, and then again on 07/06/2024 until 01/07/2024. The application was also advertised in the local paper on 30/08/2018 (expiring 23/09/2018) and again on 13/06/2024 (expiring 07/07/2024).

- 4.13 No objections or responses were received during either of these consultation periods or at any other point prior to this recommendation being made.

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](#)

[E1 Offices](#)

[E2 Providing suitable business space](#)

[E3 Affordable workspace](#)

[HC1 Heritage conservation and growth](#)

[SI 1 Improving air quality](#)

[SI 2 Minimising greenhouse gas emissions](#)

[SI 13 Sustainable drainage](#)

[T1 Strategic approach to transport](#)

[T3 Transport capacity, connectivity and safeguarding](#)

[T4 Assessing and mitigating transport impacts](#)

[T5 Cycling](#)

[T6 Car parking](#)

[T6.2 Office Parking](#)

[T7 Deliveries, servicing and construction](#)

[London Plan Guidance \(LPG\)](#)

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 H3 Protecting existing homes](#)

[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 TC2 Camden's centres and other shopping areas](#)

[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](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Air Quality - January 2021](#)

[Amenity - January 2021](#)

[Biodiversity CPG - March 2018](#)

[Design - January 2021](#)

[Developer Contribution CPG - March 2019](#)

[Employment sites and business premises - January 2021](#)

[Energy efficiency and adaptation - January 2021](#)

[Holborn Vision – January 2025](#)

[Housing - January 2021](#)

[Town centres and retail - January 2021](#)

[Transport - January 2021](#)

[Water and flooding CPG - March 2019](#)

Other guidance:

[Bloomsbury Conservation Area appraisal and management strategy \(2011\)](#)

[Kingsway Conservation Area appraisal and management strategy \(2001\)](#)

[Seven Dials \(Covent Garden\) Conservation Area appraisal and management strategy \(1998\)](#)

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).

Holborn Vision

The Council adopted the [Holborn Vision](#) Supplementary Planning Document (SPD) on 29 January 2025, which is an SPD to Camden's adopted Local Plan. The SPD builds on the policies to guide development and investment around Holborn, seeking to improve places and spaces and enhance the experience of living, working, and visiting this area.

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
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8	Design and heritage
9	Impact on amenity
10	Sustainability and energy
11	Transport
12	Employment and training opportunities
13	Biodiversity Net Gain (BNG)
14	Community Infrastructure Levy (CIL)
15	Conclusion
16	Recommendation
17	Legal comments
18	Conditions
19	Informatives

7. LAND USE

Proposed office E use

- 7.1 The proposed development would deliver an increase of 1,153sqm of floorspace (GIA), which would all fall under Class E use. The site is located within the Central London Area's Central Activities Zone, which the London Plan identifies as a nationally important strategic office location. It is also a primary frontage of the Holborn Central London Frontage, as set out in the 'Town centres and retail' CPG.
- 7.2 Policy E1 of the Local Plan supports the provision of a range of business and employment floorspace including the intensification of existing employment sites, and seeks to direct new office development to the growth areas, Central London, and town centres to meet expected demand. Policy E2 is clear the council will resist loss of a business use to a non-business use unless it has been explored whether there is possibility for that use to continue. It also states that where premises or sites are suitable for continued business use, the Council will consider higher intensity redevelopment schemes which improve functional efficiency, maintain or, preferably, increase the amount of employment floorspace and number of jobs. Any re-provided employment floorspace on the proposal site should be designed flexibly to be able to accommodate a range of business types and sizes, in particular small and medium-sized enterprises (SMEs) and businesses in growth sectors such as the creative industries.

- 7.3 The proposals involve the intensification and improvement of the existing employment use with the refurbishment and extension of the existing building to provide high quality, flexible, and adaptable office floorspace which would be able to cater for future changes in demand. The existing office floorspace is currently vacant, and as such, there would be no impact on existing businesses or occupiers.
- 7.4 The 'Employment Sites and Business Premises' CPG sets out how the Council will seek to use planning obligations to secure an element of affordable SME workspace from large scale employment developments with an uplift in floorspace of 1,000sqm (GIA or gross internal area) or more. As the employment floorspace uplift is above 1,000sqm, this requirement is triggered; this consideration is assessed in further detail in section 12 of this report.
- 7.5 Given the site's location within the Central Activities Zone and as a primary frontage of the Holborn Central London Frontage, the uplift and improvement of the existing employment floorspace is considered appropriate development in this location which would contribute towards a successful and inclusive economy, in accordance with both local and national policies, including policies G1, E1, and E2 of the Camden Local Plan, and London Plan policies GG1, GG2, E1, and SD4.

Mixed use policy and residential accommodation

- 7.6 Policy H2 promotes a mix of uses in new developments, including a contribution to the supply of housing. In the Central London Area, where development involves additional floorspace of more than 200sqm (GIA), the Council requires 50% of the additional floorspace to be provided as self-contained housing. This is required to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. The proposed development would involve an uplift of 1,153sqm of floorspace which triggers the requirements as set out in Policy H2.
- 7.7 The first part of Policy H2 provides a set of criteria which will be considered when determining whether self-contained housing is required as part of the mix of uses on site. These include:
- a) the character of the development, the site, and the area;
 - b) site size, and any constraints on developing the site for a mix of uses;
 - c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
 - d) whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
 - e) whether the development is publicly funded or serves a public purpose.

7.8 Taking into account the above, it is considered that self-contained housing is required as part of a mix of uses. The policy goes on to note that the Council may seek provision of housing as a payment-in-lieu, where the Council is satisfied that providing on-site housing, or failing this off-site housing at an alternative nearby site, are not practical. The method of housing provision is required to be fully explored in succession, with payment in lieu only being accepted once the lack of on-site delivery has been justified, then subsequently off-site provision shown to be fully considered and discounted. In considering whether housing should be provided on site, the Council will take into account the following additional criteria:

- f) the need to add to community safety by providing an active street frontage and natural surveillance;
- g) the extent of any additional floorspace needed for an existing user;
- h) the impact of a mix of uses on the efficiency and overall quantum of development;
- i) the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j) whether an alternative approach could better meet the objectives of this policy and the Local Plan.

7.9 In this case, the key issues relate to criteria (h) to (j), and the economics and financial viability. The applicant submitted a letter from Farebrother, a real estate advisory firm, to make the case that it would not be possible to facilitate residential on-site. This included the fact that the site constraints would mean that it would not be possible to introduce a new entrance location elsewhere at the site, so there would have to be a shared office and residential entrance. This raises concerns regarding the lettability of the building, as well as introducing security concerns that would need to be mitigated through other mechanisms or arrangements. Additionally, the applicant has raised concerns regarding the inability to fit three uses (namely commercial, office and residential) within the envelope, the nature of the property as a Grade II listed building that would potentially be harmed by the creation of a separate access core for residential, and the operational requirements of future businesses requiring pavement access not only for customers, but for servicing/delivery/waste collection and other matters.

7.10 Although the Council's preference is for mixed-use development, it is accepted that existing site constraints can make this arrangement more difficult to achieve in specific circumstances. In this instance, the applicant does not own or have access to other sites in the nearby area that could suitably provide the required housing. Additionally, it is noted that the surrounding area is highly developed, so it is accepted that in these specific circumstances that off-site provision would not be feasible. Given the issues outlined above, it is accepted that a payment-in-lieu would be more suitable

on this occasion. As such, a contribution of £864,750 is required (1,153 x 50% x £1,500), which shall be secured through Section 106 legal agreement.

- 7.11 Subject to the agreement to make the policy compliant payment in lieu of providing housing on site, the proposal is considered to comply with the requirements of Policy H2.
- 7.12 Policy H3 of the Local Plan makes clear that the Council will aim to ensure that existing housing continues to meet the needs of existing and future households, including by resisting development that would involve a net loss of residential floorspace.
- 7.13 There is an existing unit located on the fourth and fifth floors laid out as residential use, consisting of 80sqm of floorspace. It is understood to have never been used as a self-contained single residential dwelling but for the occasional use of the management of the former bank on the site and their family. This is considered to make its use ancillary to the main Class E use and not a separate residential use (Class C3) in its own right. The unit is not considered to provide a particularly good standard of accommodation, and due to its location within the site, would not be compatible with the commercial use of the rest of the building. There is no segregated residential entrance. The residential unit appears to have been vacant since the late 1990s. Given the history of the existing unit it is not considered that the normal protection of residential accommodation under policy H3 would apply in this instance and its replacement within the development has not been seen as a requirement by officers.

Conclusion

- 7.14 The refurbishment and extension to the existing commercial building is considered appropriate in this location within the Central London Area. The development would contribute towards a successful and inclusive economy in accordance with Local and Regional policies. Although no housing would be provided on-site or off-site, officers are satisfied that it is not practical to do so and a payment-in-lieu is therefore acceptable which will go towards providing new affordable housing in the Borough. As such, the proposals would comply with the requirements of policies G1, E1, E2, H2, and H4 of the London Borough of Camden Local Plan and policies GG2, D3 and E1 of the London Plan.

8. DESIGN AND HERITAGE

- 8.1 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 surroundings – summary

- 8.2 The site consists of a Grade II listed building situated on the south side of High Holborn, just west of the intersection with Kingsway. The building was constructed as a bank in the mid 19th century, and is a four storey structure (plus basement). It is located within the Bloomsbury Conservation Area, but immediately abuts the Kingsway and Seven Dials Conservation Areas, to the east and south, respectively.

Designated and non-designated heritage assets

- 8.3 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.
- 8.4 The application site is located within the Bloomsbury Conservation Area, with the Kingsway Conservation Area located to the east and the Seven Dials Conservation Area located to the south. Directly opposite the site on the corner of High Holborn and Southampton Place is no.127-129 High Holborn (Grade II listed), and to the west of the site is the Princess Louise public house (Grade II* listed), which is separated from the application site by a non-listed building. To the south of the site, also separated by a non-listed building, is Aviation House (Grade II listed).



Figure 3: Map of local heritage designations (application site shown centrally). Yellow = Conservation Area; Blue = Listed structure (Grade II); Green = Listed structure (Grade II*).

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

212 High Holborn – no harm

- 8.6 The host building was constructed as a bank in 1854, and forms one of a group of mid-to-late 19th century developments with classically influenced details on the southern side of High Holborn. The building is constructed of Portland stone and consists of 4 storeys with a basement. The building has already been altered to the rear, including through the addition of rear extensions and a fourth storey roof extension.
- 8.7 The list entry of the building notes the five-bay symmetrical façade in Palladian style, the projecting entrance bays, and the segmental arched ground floor windows. Similarly, arched doorways, columns, and balustraded balconies are all noted as contributing to the building's significance. The interior was not inspected, and no reference is made to this.
- 8.8 The proposed works would not obscure or impact any of the architectural features that contribute to the significance of the host building, and as such would have no negative impact to this part of the application site. The rear extension would be visible from the front of the site, however it would not change the setting to a significant degree when compared to the visual impact of the extant tall building of 129-133 Kingsway, which wraps behind 212 High Holborn, nor would the proposed structure disrupt any views of the front elevation. As a result, there would be no harm to the setting of the listed building.
- 8.9 The removal of the fourth floor roof extension would not harm the significance of the building, as this addition is not original. Similarly, the slight change to the roof form would maintain the pitched appearance and would be acceptable.
- 8.10 Inside the building, the ground floor has little in the way of historic partitions, and the proposed alterations are considered not to harm the plan form through the addition of new internal walls. The replacement of the mezzanine would be acceptable and would not harm the significance of the listed building. The historic partitions at first and second floor would be preserved, which is supported. There would be some minor removal of historic fabric throughout, however none of the alterations would harm the significance of the building, so would not be considered to harm the heritage asset.

Bloomsbury Conservation Area – no harm

- 8.11 The site is situated within the Bloomsbury Conservation Area, which covers an area extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south. The proposed development is therefore situated at the very south of the area. The Conservation Area is typified by

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

- 8.12 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).
- 8.13 The Bloomsbury Conservation Area Appraisal and Management Strategy makes reference to the application site by noting its alignment with the prevailing building height of five or six storeys and its contribution to the variety of materials present in this area of the conservation area.
- 8.14 The proposed works would retain the existing stone-faced Palladian style front elevation, and the building would appear largely as currently existing from the front, with the bulk of the extension largely screened from public views by the host building and adjacent properties. There is also the existing tall building of 129-133 Kingsway rising behind the site. As such, the new development would give a similar appearance to the existing streetscape and would be clearly appreciable except from high level and to the skyline, though the change would still sit comfortably within the prevailing building heights and varied roofscape of the surrounding area.
- 8.15 The host building is currently unoccupied and has been fully vacant for a number of years now. The proposal would restore the previous commercial use, and this aspect of the proposal 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.
- 8.16 The limited demolition involved in the proposal is to remove the unoriginal roof extension that currently accommodates the upper level of the residential unit. This demolition would help return a more traditional roof form to the front of the site and would remove an inappropriate addition, so would modestly enhance the character and appearance of the conservation area.
- 8.17 Overall, it is considered that the works would preserve the character and appearance of the Bloomsbury Conservation Area. The proposed extension would introduce an element which has a similar visual relationship with the

host building as part of 129-133 Kingsway, which raises behind the site giving a similar relationship to the setting of the host building and local townscape, with limited visibility from the public realm.

127-129 High Holborn

- 8.18 This building is a Grade II listed building constructed in the very early 20th century by H Percy Adams and Charles Holden. It primarily consists of Portland stone with granite at the ground floor, and has four storeys with a roof level above. The site has more recently been used as office space and a bank.
- 8.19 This building is directly opposite the application site, and the two buildings can be appreciated together in some local and middle-distance views along High Holborn, both from the east and the west, and south along Southampton Place. However, due to the nature of surrounding development and the mixed-character of the built context, the two do not have any particular relationship with one another, and the proposed development at the application site will not have any significant impact on the significance of the listed building.
- 8.20 The proposed roof addition will not be clearly visible in relation to 127-129 High Holborn due to its set back design, and where it has greater visibility from Southampton Place, it will read in a similar way to the existing development located to the south of the application site. The works would not undermine the prominence of the building, and would contribute to the established mixed character of this local area.
- 8.21 The proposed development would therefore preserve the significance of the Grade II listed building, including its setting and its contribution to the character and appearance of the conservation area. Therefore, it is considered that there is no harm to this heritage asset.

Princess Louise public house

- 8.22 This public house is Grade II* listed and was constructed in the mid-19th century by William B Simpson and Sons. The building is constructed of yellow brick with stone and terracotta dressings, and is four storeys with red granite columns and pilasters at the ground floor façade.
- 8.23 The site is located two buildings along from this listed building, so the two structures are separated by a non-listed building. The listed building can be seen in local and middle-distance views along High Holborn, where it can be appreciated as part of a wider and mixed-character built context. The chief relationship between the two buildings is their position as components of the mixed façade, as noted in the Bloomsbury Conservation Area Statement.
- 8.24 Due to the mid-terrace position of the application site and the height of neighbouring buildings, the new additions to the host building will have

extremely limited visibility, and would not be able to be appreciated in the context of the Princess Louise public house.

- 8.25 As such, the proposed development would preserve the significance of the Grade II* listed public house, including its setting and its contribution to the character and appearance of the conservation area. Therefore, there is no harm to this heritage asset from the proposed development.

Kingsway and Covent Garden Conservation Areas

- 8.26 The application site directly abuts two different conservation areas, with the Covent Garden Conservation Area directly to the south and the Kingsway Conservation Area directly to the east.

- 8.27 Although the site is in extremely close proximity to these two conservation areas, the nature of the surrounding development means that it bears very little relationship with either, as it is effectively bordered on both sides by large, dominant buildings. The proposed development would not exceed the height of the surrounding buildings, and as such would remain a subordinate and characteristic addition to the streetscape and roofline. It would therefore align with the established street pattern and density of surrounding built development, so would not negatively impact on the character or appearance of either conservation area.

- 8.28 As such, it is considered that there would be no harm to these heritage assets from the proposed development.

Design assessment

- 8.29 The proposed design clearly separates the rear addition from the original main building. The existing roof extension to the rear of the main pitched roof is proposed to be removed, and the roof of the main building replaced. The replacement roof would be similar in design, with a pitched tiled roof behind the original parapet. Behind this, there would be a flat roof terrace with the new extension to the rear of the site. The rear extension would rise two storeys above the highest level of the existing building, and would appear as a modern yet sensitive addition to the historic building.

- 8.30 The floorplates of the second and third floors would be level across the historic building and the rear extension, but below this there would be a slight level difference due to the existing structure constraints. The fourth and fifth storeys of the rear extension would have no connection through to the existing building given that the roof level of the latter is lower.

- 8.31 The appearance of the front elevation would remain relatively unchanged from its existing appearance. It is noted that the removal of the ATMs has already been approved under a previous application. From long views down Southampton Place, the modern extension would be visible behind the historic front elevation, which would read as an appropriate addition in the

context of this dense and commercial urban area. The rear extension would have limited visibility from other surrounding streets due to neighbouring buildings.

- 8.32 The modern extension to the rear consists mainly of aluminium curtain walling, aluminium cladding coloured grey, and terracotta rainscreen cladding. The proposed increase in height and massing are considered to be acceptable due to the stepping back from the front elevation and the higher surrounding buildings. Although undeniably visible in longer views, particularly when viewed from the front, the additional height and massing will be of an acceptable design and appearance and is not considered to be overbearing or out of character with the existing streetscape when read against the prevailing development in this area, nor would it overwhelm the neighbouring buildings.
- 8.33 The proposed materiality of the extension and façade details and proportions are considered to be architecturally appropriate in respect of the site's surroundings. In terms of townscape, it is considered that the proposals would provide a high-quality development that would be a positive addition to the local area while respecting the sensitivities of the surrounding context and responding to the constraints of the existing listed building. A sample panel of the proposed materials indicating the colour and finish would be secured by condition, as well as detailed and coloured drawings of each elevation and sections of windows and doors, in order to ensure the necessary standard of design is delivered on site.

Conclusion

- 8.34 It is considered that there would be no harm arising from the proposed development to the identified heritage assets, including the host listed building, nearby listed buildings, host conservation area, or adjacent conservation areas. From a design perspective, the proposed development would be a well-considered and high quality contemporary addition to the existing building, which accords with the character and appearance of the surrounding local area.
- 8.35 The proposal would create a high quality office and retail environment and return a vacant site to active use, bringing 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.
- 8.36 The proposal would preserve the character and appearance of the host and surrounding conservation areas overall. It would also preserve the special architectural or historic interest of the host listed building and surrounding listed buildings. The Council has had special regard to the desirability of preserving the character and appearance of all the relevant Conservation

Areas, and the listed buildings, their setting, and their features of special architectural or historic interest.

- 8.37 As such, it is considered that the proposed development would comply with Policies D1 and D2 of the London Borough of Camden Local Plan 2017.

9. IMPACT ON NEIGHBOURING AMENITY

- 9.1 Policies A1 and A4 of the Local Plan 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. Impact from construction works is also relevant but dealt with in the 'Transport' section. 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

- 9.2 A Daylight and Sunlight Report has been submitted as part of the application which details any impacts upon neighbouring properties (this report was submitted in 2021 in addition to an earlier Daylight and Sunlight Study that was submitted with the initial submission). The 'Amenity' CPG and the BRE Guidelines focus on impacts to residential properties with protection of their amenity being given greater weight. 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.”

- 9.3 The submitted report investigates any impact on neighbouring residential properties at 1-40 Aria House and 1-3 Newton Street. It also tests properties that have commercial/office occupiers, and the report identifies 123-126 and 127-129 High Holborn as having unknown uses. Upon review, it is believed that these properties house only commercial and office (non-residential) occupiers. The majority of non-residential properties nearby are non-sensitive uses and minimal weight is therefore attached to any impacts.
- 9.4 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 9.5 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

9.6 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.*

9.7 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.

9.8 Whilst BRE cites 27% VSC as the benchmark “minimum” for good daylight potential, for urban development densities found more typically in Camden such as Holborn, Covent Garden and Hatton Garden, planning officers have noted that VSC values of 15% to 20% can be tolerated as an acceptable

norm. There will always be the higher values of 27% and above found in dwellings on upper floors or facing across open spaces like parks, squares and larger gardens, while at the same time VSC values of less than 10% are common, more usually for secondary windows such as those facing into alleyways and lightwells. The reliance on artificial lighting for such rooms can be accepted, especially where the room itself also serves a secondary function or used more at night-time such as a bedroom.

Assessment

9.9 The Daylight and Sunlight Assessment confirms that all habitable rooms pass the Vertical Sky Component (VSC) test, with the exception of 10 windows at 1-40 Aria House. These are windows 105, 106, 107, 112, 113, 114, 116, 117, 118, and 122.

9.10 The report does note that of the aforementioned 10 windows, four fall only marginally short of the VSC target (windows achieve a reduction ration of 0.7 and above against the target of 0.8). The table below shows the VSC impacts in terms of percentage loss for the ten windows falling short of the target. It is also noted that the windows at Aria House facing the application site are located on an elevation that is sited close to the boundary, meaning a higher degree of obstruction is generally inevitable with any development. The report also outlines that there is likely to be a bigger degree of daylight impact where modern interventions are made to an historic area, as is the case here.

Reference	Room use	Before	After	Loss	Ratio
Window 105	Bedroom	15.1%	7.6%	7.5%	0.5
Window 106	Bedroom	18.6%	10.8%	7.8%	0.58
Window 107	Bedroom	22.7%	15.8%	6.9%	0.7
Window 112	Bedroom	14.7%	8.0%	6.7%	0.54
Window 113	Bedroom	18.2%	11.3%	6.9%	0.62
Window 114	Bedroom	22.5%	16.4%	6.1%	0.73
Window 116	Bedroom	13.7%	8.4%	5.3%	0.61
Window 117	Bedroom	17.2%	11.9%	5.3%	0.69
Window 118	Bedroom	21.6%	17.1%	4.5%	0.79
Window 122	Kitchen	10.3%	7.5%	2.8%	0.73

Table 1: Vertical Sky Component (VSC) results for 10 windows short of BRE targets.

9.11 The most impacted windows as a result of the development are mostly located at the lowest levels and closest to the development. Upon review of the floorplans of Aria House, the floorplate is repeated at first to fourth floors, and the windows closest to the development serve bedrooms, with only one

of the ten windows not meeting the VSC target serving a kitchen. BRE guidelines state that daylight is required in living rooms, kitchens, and bedrooms, but that bedrooms are less important in terms of daylight distribution.

9.12 Similarly, the Daylight Distribution (DD) test confirms that 12 rooms at 1-40 Aria House fall short of the DD test, however 10 of these rooms are bedrooms. The table below shows the DD impacts in percentage loss for the twelve windows falling short of the target. Whilst the reduction in both VSC and DD are concerned for the affected rooms, the proximity of the affected windows to the site boundary combined with their low level within the building in a back-land setting mean that they will always be vulnerable to loss of light in an urban, built-up context such as this. However, given the aforementioned importance of bedrooms in relation to other habitable rooms combined with the fact that the windows failing to meet BRE targets represent a very small proportion of the overall number of windows in the building, it is considered that the impact in terms of VSC and DD is acceptable in the dense urban context of the application site.

Reference	Room use	Before	After	Loss	Ratio
Window 105	Bedroom	84	20	64	0.24
Window 106	Bedroom	85	24	61	0.28
Window 107	Bedroom	90	37	53	0.41
Window 112	Bedroom	74	31	43	0.42
Window 113	Bedroom	76	34	42	0.45
Window 114	Bedroom	80	48	32	0.6
Window 116	Bedroom	76	50	26	0.66
Window 117	Bedroom	78	54	24	0.69
Windows 127 & 128	Living/Dining	58	38	20	0.66
Windows 129 & 130	Living/Dining	67	42	25	0.63
Window 146	Bedroom	29	22	7	0.76
Window 148	Bedroom	42	32	10	0.76

Table 2: Daylight distribution (DD) results for 12 windows short of BRE targets.

9.13 All windows which face within 90 degrees of due south have been tested for direct sunlight. All habitable room windows pass both the total annual sunlight hours test and the winter sunlight hours test. The proposed

development therefore satisfies the BRE direct sunlight to windows requirements.

9.14 There are no nearby gardens or amenity areas directly to the north of the development. The proposed development will therefore not create any new areas which receive less than two hours of sunlight on 21st March. The proposed development satisfies the BRE overshadowing to gardens and open spaces requirements.

9.15 As noted above, the results of the Daylight and Sunlight Report do show that the proposed development will not fully comply with BRE guidelines. However, when assessing the impact on neighbouring light levels, the BRE guidance notes that the numerical data must be interpreted flexibly and the assessment of the effects of a development is also a matter of judgement as to whether that deterioration would be acceptable in the circumstances.

Daylight and sunlight conclusion

9.16 Given a number of factors including the nature of the windows most impacted, the close proximity to the site boundary of neighbouring buildings, and the context of the application site as within a historic city centre characterised by modern tall buildings, high density, and close proximity, it is considered that the impact to daylight and sunlight would be acceptable.

9.17 When considering the data as a whole, the fact that the significant impacts are predominantly limited to windows at lower levels and that the building is located within a fairly dense urban environment with a tight grain and short distances between neighbouring buildings, combined with the fact that many rooms do not meet BRE recommended values in the existing situation and the inflated impact this can have on the percentage loss, the potential impacts to daylight and/or sunlight are not considered to be so great as to cause significant harm to the amenity of the residents within this building or to warrant refusal of the application on this ground.

Outlook

9.18 The proposals involve the erection of a six-storey rear extension, which would undoubtedly introduce massing to the rear that would impact on outlook for neighbouring properties. It is acknowledged that the closest residential occupiers to the rear at Aria House would be most affected, being some 5m away at the closest point.

9.19 However, whilst the proposal would clearly have an impact on the level of outlook to properties, particularly at lower levels, the existing context already means that there is limited outlook at this location; the surrounding buildings are all at least four storeys with many much taller, and the proposed development would mostly be infilling an existing recess. As such, there

would be no substantial worsening of the outlook of nearby residents, and subsequently no significant impact to amenity.

Noise and disturbance

- 9.20 No external plant is proposed as part of the application, with plant continuing to be located at basement level, as existing. This is considered acceptable, subject to conditions regarding the noise level and anti-vibration measures.
- 9.21 It is noted that a roof terrace would be introduced to the flat roof of the building, between the pitched section of roof at the front of the development and the rear extension. Typically, the Council would seek to secure a condition restricting the hours of use of the roof terrace in the interests of neighbouring amenity. In this instance however, the terrace would be flanked by development at either side. The front of the terrace would also be obscured by the existing roof of the building. There are also no residential occupiers who would be impacted by the use of the terrace, as residential properties are located to the rear. As such, a condition is not required to control the hours of use of the terrace.
- 9.22 Whilst the proposal would result in an intensification of the site as a result of the increase in office floorspace, it would be a continuation of the existing use, utilising the same access points in this largely commercial area. The proposed development is therefore unlikely to result in unduly harmful levels of noise and disturbance to surrounding occupants.
- 9.23 Noise during construction is covered in the 'transport' section of this report.

Overlooking and privacy

- 9.24 The proposed rear extension would contain large aspects of glazing. This would primarily face eastwards, though glazing would also face west and south. The location of the windows has been sited to avoid overlooking to neighbouring occupiers at Aria House. Whilst views may be achievable from the south and west facing windows, these would be at an oblique angle and would not constitute undue harm to the occupiers. The windows would otherwise face towards neighbouring commercial units. On this basis, it is considered that the proposal would not represent an unduly harmful impact to neighbouring properties in terms of overlooking and privacy.

Conclusion

- 9.25 It is considered that there would be no harm to amenity arising from the proposed development. Whilst there would be some impact to daylight and sunlight, this would not be significant and is considered acceptable in the context of the site and surrounding context. The proposed works would be appropriate in terms of overlooking, privacy, noise, and outlook, subject to conditions where required. As such, it is considered that the proposal would

comply with Policies A1 and A4 of the London Borough of Camden Local Plan 2017.

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 proposed development comprises the refurbishment and extension of the existing building to provide high quality office/retail accommodation and to optimise and increase office floorspace. This includes significant improvements to the energy performance of the building and improvement of the building's sustainability credentials. The development strategy improves the overall energy performance and delivers lower embodied carbon over its lifecycle. However, it is important to note that the building's listed status 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 seeks to retain as much historic fabric as possible, so there is limited demolition proposed. The most significant areas of demolition are the removal of the existing roof extension at fourth floor level and internal partitions throughout; therefore, it is considered that there is no substantial demolition.

10.6 Given the above, there is no requirement for a Whole Life Carbon (WLC) assessment.

10.7 The development aims to achieve resource efficiency through recycling and reuse of materials, so to this end, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% or greater of demolition/strip out waste to be diverted from landfill and put to beneficial use.

Energy and carbon reductions

- 10.8 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

Energy and carbon summary

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

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	47 %
Be green stage (renewables): CLP policy CC1	20%	40%
Total carbon reduction: LP policy SI2 and LP CC1	35%	87%

Table 3 - Carbon saving targets (for majors) and the scheme results

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

Total carbon reductions

- 10.11 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021).

- 10.12 In this case, the development significantly exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 87% below Part L requirements, as shown in Table 1 above. Therefore, a carbon offset contribution is not required.

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.

- 10.14 In this case, the development significantly exceeds the policy target of 15%, reducing emissions by 47% at this stage through energy efficient design, in

compliance with the development plan. The proposals involve high performance insulation, low air permeability, efficient glazing, and addresses the requirements of the cooling hierarchy to reduce the level of active cooling. The proposal includes energy efficient measures like mechanical ventilation, passive ventilation, and low energy light fittings.

Be clean stage (decentralised energy supply)

10.15 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.

10.16 In this case an assessment of the existing London heat map has been made and demonstrated that there are no existing local networks present within connectable range of the scheme.

Be green stage (renewables)

10.17 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.

10.18 In this case, the development exceeds the policy target of 20%, reducing emissions by 40% at this stage through renewables, in compliance with the development plan. The proposal includes PV panels on the roof and details air source heat pumps (with full details of both being secured by condition).

Be seen (energy monitoring)

10.19 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 reporting. The **Energy and Sustainability Strategy secured by Section 106 legal agreement** will secure reporting to the GLA in line with their published guidance.

Climate change adaption and sustainable design

10.20 Local Plan policy CC2 expects non-residential development involving an increase in floor area of 500sqm or more to meet BREEAM Excellent. The submitted pre-assessment for the proposed development indicates that it is expected to achieve BREEAM Excellent and comply with the Council's policies, with the following targets being met:

- Energy – 91.67% available credits are targeted which would exceed the minimum requirement of 60%

- Water – 87.5% available credits are targeted which would exceed the minimum requirement of 60%
 - Materials – 75% of available credits are targeted which would exceed the minimum requirement of 40%
- 10.21 It is noted that the proposal does include some active cooling, which the sustainability statement confirms would use variable refrigerant flow type heating and cooling as a low carbon option. The applicant has provided a basic cooling statement as part of their energy and sustainability statement, which notes the scheme responses to the cooling hierarchy. This includes explanation of efficient design approach such as locating glazing to the north and east, incorporating low energy lighting, and insulation of servicing pipes, as well as incorporation of mechanical ventilation systems throughout the development. Further details to expand on and demonstrate the need for cooling are secured by condition, which will demonstrate that the cooling hierarchy has been clearly followed and implemented where possible.
- 10.22 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.
- 10.23 The proposal incorporates sustainable drainage in the form of a green/blue roof with a holding capacity of approximately 8,470 litres and achieving runoff of 0.8 litres/second. Given the site constraints and the heritage considerations of the existing building, the applicant is not proposing any additional SUDS features, which is accepted. The blue roof only covers the roof of the new extension, and does not extend to the original building. The green/blue roof would also integrate with the aforementioned solar panels, and details will be secured by condition.

Flood risk and drainage

- 10.24 Local Plan Policy CC3 is relevant with regards to flood risk and drainage. Given the combined floor area of the proposed extension and the refurbished areas would be over 1000sqm, the development is expected to strive to meet the targets set out in Policy CC3. As this is an aspiration, failure to comply with this would not form a reason for refusal.
- 10.25 As noted above, a green/blue roof is proposed that would reduce the runoff from the application site, and consists of a suitable capacity to slow runoff rates accordingly. It is noted that whilst the run off from the catchment areas of the green/blue roof areas is greenfield run off rate, this does not necessarily mean that the proposal as a whole meets greenfield run off rates, as green/blue roofs only cover a proportion of the roof area. However, as previously discussed, the existing site constraints and listed nature of the host building meant that this is accepted.

Air quality

- 10.26 The whole of the Borough of Camden was declared an Air Quality Management Area (AQMA) in 2002 due to concern over the achievement of long-term NO₂ AQS objective and short-term PM₁₀ AQS objective.
- 10.27 Camden's Local Plan requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality.
- 10.28 As a result of the time since submission of the application and this recommendation being made, the air quality assessment requires updating. As such, a condition has been included to secure a revised air quality assessment at least three months prior to commencement, which will demonstrate that the development will be at least "air quality neutral". This condition will also secure any mitigation that may be required to ensure that the development is neutral in terms of its impact to air quality. Subject to this condition, the proposal is acceptable in air quality terms.
- 10.29 With regards to impacts from demolition and construction works, the overall risk from the construction are determined to be low risk and appropriate mitigation measures are proposed to ensure this is negligible. These measures shall be secured as part of the Construction Management Plan secured by S106 agreement.

Conclusion

- 10.30 In summary, the proposed energy and sustainability strategy is acceptable, and would meet targets in terms of carbon reductions and on-site renewables. The operational carbon savings and measures set out above will be secured under an Energy and Sustainability Strategy secured by Section 106 legal agreement, in compliance with the development plan. Additionally, the proposal would appropriately reduce flood risk through the inclusion of a green/blue roof, and measures are secured to ensure that the development is at least air quality neutral. As such, the proposal complies with policies CC1, CC2, CC3, and CC4 of the London Borough of Camden Local Plan.

11. TRANSPORT

Policy review

- 11.1 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.
- 11.2 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% of all trips in inner London to be made by foot, cycle, or public transport by 2041. The policy also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

- 11.3 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. The Council has also developed a [Freight and Servicing Action Plan \(FSAP\)](#) to support safe, clean and efficient deliveries, freight and servicing operations in the borough. It will help meet the objectives in the Camden Transport Strategy, and the Plan was adopted on 1 July 2024.
- 11.4 The Council consulted on the [Draft new Local Plan](#) from 17th January to 13th March 2024. The document sets out the Council's vision for future development in Camden for the next 15 years. Of particular importance to this development is the Holborn Liveable Neighbourhood (HLN), which is an infrastructure priority scheme.
- 11.5 It is the Council's intention to transform Holborn into a place for people with attractive, healthy, accessible, and safe streets for everyone, and ensure getting around by sustainable and healthy types of transport is easier and faster. To achieve this, the Council is creating ideas for transforming the area through changes like widening pavements, making some areas car free, improving cycle routes, adding public spaces and plants and trees.
- 11.6 [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 objectives, policies, and measures for achieving this goal. The priorities include:
- Increasing walking and cycling;
 - Improving public transport in the Borough;
 - Reducing car ownership and use;
 - Improving the quality of our air;
 - Making our streets and transport networks safe, accessible, and inclusive for all.
- 11.7 In 2023, the Council reviewed its progress so far on the CTS and also set out our delivery plan for the period covering 2024/25. This was presented to [Culture and Environment Scrutiny Committee on 6th February 2024](#). The plan includes commitments, all of which are pertinent to this application, and which will be expanded upon in later sections, to:

- Implement proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists by significant road safety improvements via the Holborn Liveable Neighbourhood (HLN) scheme;
 - 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](#);
 - Continue to expand our dockless bike and e-scooter hire network; and
 - To contribute towards the implementation of the CTS Cycling Action Plan, Walking and Accessibility Action Plan, and Road Safety Action Plan.
- 11.8 Camden's [Clean Air Action Plan](#) and [Climate Action Plan](#) also contain policies which are relevant to our transport observations.

Site location and access to public transport

- 11.9 The site is located in the Central London Area on High Holborn, which forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.
- 11.10 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). Holborn London Underground station is located approximately 80m metres east of the site, and the closest bus stop is located in front of the property, with further bus stops available on Bloomsbury Way and Kingsway.
- 11.11 The site is easily accessible from the Strategic Cycle Network, with Cycleway C52 on Newton Street offering connections to Covent Garden to the south, and St Pancras and Euston Railway stations to the north.
- 11.12 The nearest Santander cycle hire docking station is located on Southampton Place directly opposite the development. This location also offers a dedicated parking bay for dockless rental e-bikes and rental e-scooters. However, this bay is already showing signs of overcapacity and increasing demand. Camden Transport has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared transport modes: Car Clubs, Santander bicycles, E-scooters, and Cycle Hire bays. It is our aspiration for the STAL score to be 6b in the area. 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

- 11.13 The proposal will increase the floor area by approximately 1,153 sqm of additional office and commercial floorspace.
- 11.14 The TRICS database was used to derive the anticipated total person trip rates. Table 4 presented in the TA shows a net change in AM and PM peak trip generation between the existing and proposed use.
- 11.15 Based on other developments in the area, it is anticipated that a high volume of the walking trips is likely to be made from Holborn London Underground station, nearby bus stops, and commercial, entertainment, shopping, and restaurant venues in Holborn.
- 11.16 Considering the increase in active travel to and from the site, the applicant will be requested to provide a financial contribution towards the aforementioned HLN project.

Travel planning

- 11.17 A Framework Travel Plan was included in the TA. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport.
- 11.18 However, the Travel Plan appears light in content and does not include projected modal share for cycling and walking. Modal share projections for walking and cycling will need to be in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.
- 11.19 A full Travel Plan covering an associated monitoring and measures contribution of £11,348 will be secured by legal agreement if planning permission is granted.

Access and permeability

- 11.20 Only pedestrian and cycle access involving four shallow steps is available to the site from High Holborn. The current scheme does not propose any changes to the existing access, though it is noted that due to the listed status of the building, any alteration to improve access may result in harm to the significance of the listed building. Therefore, the current set-up is considered acceptable given the site context.

Cycle parking

- 11.21 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG 'Transport', the London Cycling Design Standards (LCDS), and London Plan Policy T5 for:
- A1 use (non-food retail): 1 long-stay space per 250 sqm (for first 1000 sqm), thereafter 1 space per 1000 sqm, and 1 short-stay space per 60 sqm (for first 1000 sqm), thereafter 1 space per 500 sqm.

- B1 use (business offices): 1 long-stay space per 75 sqm and 1 short-stay space per 500 sqm (for first 5,000 sqm).
- 11.22 Based on the retail and office use floor areas of 338 sqm and 2211 sqm, respectively, 30 long stay spaces and 10 short stay spaces are required in accordance with the London Plan policies and guidance. The proposed ground floor includes a covered cycle store to the rear, with additional cycle spaces within the rear courtyard – both of which are part of the existing building structure. The size of this would only allow for 33 cycle spaces, which is noted to be slightly below the policy requirements. However, given the minor difference between the number of provided spaces and the policy target, as well as the constraints of the site as a listed building and the additional alterations that would be required to expand the cycle store further, it is considered that the proposed cycle spaces would be acceptable in this instance. The provision of the 33 cycle spaces would be secured by condition to ensure compliance with the relevant standards and policy.

Car parking and vehicle access

- 11.23 The site is located in controlled parking zone CA-C (Single Yellow lines), which operates 08:30-18:30 Monday to Friday and 08:30-18:30 on Saturday, with 24hrs Residents Bays.
- 11.24 The development is proposed as car-free, which would be secured as a planning obligation by the Section 106 legal agreement.
- 11.25 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '*...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.*' Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: '*All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.*'
- 11.26 Paragraph 5.19 of the Camden Planning Guidance on Transport states: '*For all major developments the Council will expect that disabled car parking is accommodated on-site.*' Paragraph 5.20 further informs: '*...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site.*'
- 11.27 'National disability, accessibility and blue badge statistics: 2021 to 2022' published on 18 January 2023, report that on 31 March 2022, 4.3% of the population held a Blue Badge, an increase of 3.6% since March 2021.
- 11.28 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.

11.29 Officers expect the large majority of users of the site, including staff and visitors, to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an ‘Electric Vehicles Only’ parking bay in the controlled parking zone. The uptake of electric vehicles is increasing significantly, and 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. Therefore, an additional electric vehicle charging point (fast charger) should be provided on the public highway in the general vicinity of the site; a financial contribution of £20,000 will be secured by legal agreement to go towards the provision of this electric vehicle charging point.

CPZ review

11.30 Objective 2 of the CTS sets out to reduce car ownership and use, and motor traffic levels in Camden, and features several measures in support of achieving this objective. One of the measures is 2d, which states that the Council will *‘undertake a study to provide a robust evidence base using all relevant data and local context to identify where amendments to Controlled Parking Zone (CPZ) hours of control or size will have an impact on car ownership and car use, and use that study to help guide future reviews and decisions’*.

11.31 In alignment with that action, 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-C CPZ performed relatively poorly in terms of the impact of its current hours of control in helping manage demand, and was attributed a “Red” RAG status, which present the greatest need and/or justification for increasing the regulation parking. The review recommends, amongst others, that the CA-C hours of operation are extended subject to consultation and decision-making processes.

11.32 In 2023, the Council reviewed its progress so far on the CTS and also set out the delivery plan for the period covering 2024/25. This was presented to [Culture and Environment Scrutiny Committee on 6th February 2024](#). The Council has committed to deliver a package of Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough including:

- Controlled Parking Zone (CPZ) hours extensions
- Workplace Parking Levy
- EVCP roll out

11.33 At present, the CA-C CPZ control hours do not extend into the evening, nor do they cover Sundays, 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. Considering the scale and the location of the proposed development, it is appropriate to request a contribution of £10,000 towards the CA-C CPZ review, which is likely to take place in 2025/26.

Construction management

11.34 Policies A1 and T4 state that Construction Management Plans should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process. The policies also relate to how development is connected to the highway network. For some developments, this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP).

11.35 The site is located on High Holborn which forms part of the Strategic Road Network (SRN) and is in close proximity to strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. The Council's primary concern is public safety, but it must also be ensured that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

11.36 Given the nature of the site, surrounding area, and proposed development, a CMP will be secured by legal agreement in accordance with Policy A1. This should be prepared using the Council's CMP pro-forma in line with [LB Camden guidance on construction management](#). The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.

11.37 Implementation support contributions of £30,513 and construction impact bonds of £32,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1.

- 11.38 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by legal agreement.

Deliveries and servicing

- 11.39 A Delivery and Servicing Plan (DSP) was not provided. It is proposed that servicing takes place in line with the existing arrangements. Due to the constraints of the site, the building can only be serviced from the front elevation, so the proposed development would continue to operate in line with this established arrangement. The site is located on a wide-laned road with lay-bys on either side of the street, and there are a number of offices and retail units that currently are able to successfully manage deliveries and servicing. It is therefore considered that any likely impacts from deliveries and servicing could be easily managed through a DSP. Therefore, a detailed DSP will be secured by legal agreement, to help ensure that any operational impacts associated with delivery and servicing movements are mitigated.

Highways works

- 11.40 The proposed development will require some demolition and construction works which may cause damage to the public highway. It is suggested that a highways contribution of £30,000 be secured by legal agreement. This is a standard request applicable to all developments where construction works might result in repairs required to public highway.

Pedestrian, cycling, and environmental improvements

- 11.41 The Council is developing proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists. The estimated cost of delivering these proposals, which will be delivered under the Holborn Liveable Neighbourhood (HLN) scheme is currently estimated as circa £40M including fees, subject to detailed design. Under Objective 1 of the CTS, which is to “*transform our streets and places to enable an increase in walking and cycling*”, the Council has set out “investment priority” schemes – these being schemes which “*identify priorities for this objective where the Council will require substantial additional funds, including inward investment & partnership in delivery from TfL/ other relevant organisations, in the short to medium term, to help realise these overall goals*”.
- 11.42 Construction of the HLN scheme will take place as funds become available. Implementation of some changes to roads in the area has now started using secured funding, with subsequent phases of construction subject to financial approval as funding becomes available. It is also worth noting that Theobald’s Road will be a “primary” segregated cycle corridor within the HLN, which will improve and enhance the cycling experience in the area.

11.43 Given the site location in Holborn, a financial contribution of £150,000 towards the HLN scheme would be secured by legal agreement. This is especially relevant, considering planned improvement works on Newton Street, which will benefit future employees and visitors to the proposed development. The contribution would go towards:

- Upgrading cycleway 52;
- Widening the pavement and adding plants and trees;
- Changing the road and pavement materials; and
- Evaluating parking and loading.

Micromobility improvements

11.44 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area.

11.45 The STAL analysis shows a medium grade of 4 throughout in the area which indicates opportunities for improvement, considering it is our aspiration (and target) for the STAL score to be 6b. Officers anticipate significant demand for more parking bays to be provided in the area were this development to be approved and constructed.

11.46 A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

Conclusion

11.47 The proposal is acceptable in terms of transport implications subject to the following planning obligations being secured by legal agreement:

- Travel Plan and associated monitoring and measures contribution of £11,348;
- Car-free development;
- Off-site contribution of £4,000 for a disabled parking space;
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000;
- CA-C CPZ review contribution of £10,000;
- Construction management plan (CMP) implementation support contribution of £30,513 and CMP Impact Bond of £32,000;
- Requirement to form a construction working group consisting of representatives from the local community;

- Delivery and Servicing Plan;
- Highway works contribution of £30,000;
- Pedestrian, Cycling and Environmental Improvements contribution of £150,000;
- Micromobility improvements contribution of £10,000.

11.48 Assuming the above are secured, the application would be compliant with Policies T1, T2, T3, and T4 of the London Borough of Camden Local Plan.

12. EMPLOYMENT AND TRAINING OPPORTUNITIES

12.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is more than 1,000sqm or £3million construction costs. To ensure local people benefit from these opportunities in line with CLP policy E1, the Economic Development Team will work with the developer to deliver several benefits from the development.

During construction

- **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 (moved to a new location hence a new name). With an estimated build cost of £6.4 million, this would mean two construction apprentices and a £3,400 support fee.
- **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 Euston 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.

Post construction

12.2 Policy E2 of the CLP also encourages end uses to support employment opportunities through apprenticeships and training placements. The CPG advises this and applies to major commercial developments which will result in a net increase of 1,000sq m (GIA) or more of employment space including office, hotel, and leisure developments.

12.3 The proposal involves the uplift of 1,153 sqm of office space, and as such would meet the criteria for end use phase obligations. In line with the requirements set out in Policy E2 and the CPG 'employment sites and business premises, the following would be required:

- **End use apprenticeships** - The development should provide a rolling programme of end use apprenticeships, such that two apprentices are employed on site at any one time. Apprentices should be recruited through the Camden Apprenticeships team.
- **End use work experience** - Opportunities for end use work experience should be provided, with the target of 10 per year. These should be brokered through Good Work Camden and Camden Learning.
- **Camden STEAM** - Measures to promote the Camden Science, Technology, Engineering, Arts, and Mathematics programme to occupiers on the site should be secured.
- **Employment and training contribution** - A financial contribution of £28,189 should be secured, which would be used by the council's economic development service to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden.
- **Affordable workspace provision** - Given that the proposed development exceeds 1000 sqm, the provision of affordable workspace is required. This will be provided as a proportion of the office floorspace secured at a discounted rate from comparable market values. The Council's inclusive economy team will work with the applicant to agree an acceptable offering of affordable workspace, with policy and planning guidance generally seeking a benchmark of 20% of the office workspace at 50% discount.

12.4 The above measures would be included in a package of **Employment and Training measures secured by s106 agreement**. Subject to the securing of the above, the proposed development would be in accordance with policies E1 and E2 of the London Borough of Camden Local Plan.

13. BIODIVERSITY NET GAIN (BNG)

13.1 Biodiversity Net Gain (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.

- 13.2 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.
- 13.3 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 the application was made before 12 February 2024.

14. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 14.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. 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.
- 14.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of **£213,305.00**. This is based on the charging schedule of £185 per sqm for uplift in office floorspace within Central London (£185 x 1,153 = 213,305).
- 14.3 The proposal will also be liable for the Camden Community Infrastructure Levy (CIL). The site lies in Zone A where CIL is calculated using rates based on the relevant proposed uses – for offices, this is £110 per sqm. The estimated Camden CIL liability is therefore **£126,830** (£110 x 1153 = 126,830).
- 14.4 The figures above are estimates and would be confirmed by the Council's CIL officers were the application to be approved and the legal agreement signed.

15. CONCLUSION

- 15.1 The proposed development is a well-considered scheme that would be in accordance with local and national policies. The site is suitable for the refurbishment and intensification of the existing commercial use, and the works to provide high quality, flexible office space within the Central Activities Zone would be appropriate. No housing would be provided onsite, however the financial contribution provided in lieu of onsite provision would be fully policy compliant.
- 15.2 The host building and surrounding conservation areas and listed buildings would not be harmed by the proposal, so all affected heritage assets would be preserved. The development would be sympathetic, subordinate, and of a high standard of design quality and materiality. The provision of retail at

ground level would improve the viability and vitality of the site and the surrounding area.

- 15.3 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.
- 15.4 The development would be car-free and would support sustainable transport methodologies through the provision of cycle parking and financial contributions in support of local transport and public realm improvements. In terms of sustainability, the development would make energy efficiency and thermal improvements and minimise energy demand.
- 15.5 Paragraphs 10 and 11 of the National Planning Policy Framework state that at the heart of the Framework, there is a presumption in favour of sustainable development. When making decisions, the Council should consider the dimensions of economic, social, and environmental; the proposed development would result in benefits through all three strands without any adverse impacts significantly or demonstrably outweighing them. The proposal is considered to be a favourable sustainable development that is in accordance with relevant National and Regional Policy, the Camden Local Plan, Camden Planning Guidance, and other supporting policy guidance for the reasons noted above

Public benefits

- 15.6 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 – these are as follows:
- Bringing a currently vacant listed building into effective use and allowing it to continue to contribute positively to the conservation area;
 - Increased density of employment space in an area of the borough that designated as a growth area;
 - Contribution towards housing within the borough in the form of a payment-in-lieu;
 - Employment opportunities at both construction and end use stage, including permanent and temporary jobs;
 - Apprenticeships and work experience placements;
 - Improved energy efficiency to move towards the Council's climate targets; and
 - Contributions towards transport and public realm improvements.

16. RECOMMENDATION

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

- Payment in lieu of onsite housing of £864,750
- Construction Management Plan (CMP)
- CMP Implementation support contribution of £30,513
- CMP Impact bond of £32,000
- Pedestrian, Cycling, and Environmental contribution of £150,000
- Highways contribution of £30,000
- Electric vehicle contribution of £20,000
- Travel Plan and associated monitoring and measures contribution of £11,348
- Micromobility contribution of £10,000
- CA-C CPZ review contribution of £10,000
- Disabled parking contribution of £4,000
- Car free development
- Delivery and Servicing Plan
- Construction Working Group
- Energy and Sustainability Strategy (including BREEAM Excellent)
- Employment and Training Package
 - 2 construction apprentices and £1,700 support fee each (£3,400)
 - 2 work experience placements
 - Local recruitment (targeting 20% working with Euston Skills Centre)
 - Local procurement (targeting 10% of total construction contract)
 - 2 end-use apprentices employed onsite at any one time
 - End use work experience opportunities (targeting 10 per year)
 - Promotion of Camden STEAM
 - Employment and training contribution of £28,189
 - Affordable workspace provision (provided in the form of discounted workspace within the development)

17. LEGAL COMMENTS

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

18. **CONDITIONS**

2018/3833/P – Full Planning Permission

Standard 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:

Existing Drawings:

(8918-): L01, L02, L03, L04, L05A, L06, L07D, L08C, L09A & P09.

Demolition Drawings:

(8918-): P25B, P26B, P27A, P28A, P29A, P30D, P31, P32, P33A, P34 & P35A.

Proposed Drawings:

(8918-): P11D, P12G, P13D, P14D, P15D, P16D, P17E, P18H, P19F, P20F, P21G, P22H, P23E & P24E; Green/Blue Roof Proposal (prepared by Studio Moren).

Documents:

Sustainability and Energy Statement Revision A (prepared by JS Lewis, dated November 2024); Structural Assessment Ref: 2892-16_Rev.C (prepared by Partington & Associates Ltd, dated 23/06/2018); Transport Statement and Framework Travel Plan Ref: TR001_V1.3 (prepared by WSP, dated June 2018); Heritage Statement Ref: 2941 (prepared by Heritage Collective, dated May 2018); Design and Access Statement (prepared by Cassidy & Ashton, dated June 2018); Daylight and Sunlight Study (prepared by Right of Light Consulting, dated 29/06/2018); Daylight and Sunlight Report (Neighbouring Properties) (prepared by Right of Light Consulting, dated 29/06/2021); Archaeological Desk-based Assessment (prepared by Thames Valley Archaeological Ref: HHL16/205 (TQ 3046 8149), dated December 2016); Air Quality Assessment Ref: EGE_170_Rev.D (prepared by Eden Green Environmental, dated 05/09/2018); Ventilation Filtration Statement (prepared by Project 23, dated 28/09/2018); Planning Statement Addendum (prepared by Savills, dated July 2019); Email from Savills dated 16/07/2019; Floor area Schedule (unnumbered) received 06/09/2019; Cycle Storage details (unnumbered) by Falco.

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

Pre-start conditions (any works)

3 Air Quality Assessment

At least 3 months prior to commencement, a revised air quality assessment report, written in accordance with the relevant current guidance, for the existing site and proposed development shall be submitted to and approved in writing by the Local Planning Authority.

The development shall be at least “Air Quality Neutral” and an air quality neutral assessment for both buildings and transport shall be included in the report.

The assessment shall assess the current baseline situation in the vicinity of the proposed development. The report shall include all calculations and baseline data, and be set out so that the Local Planning Authority can fully audit the report and critically analyse the content and recommendations.

If required a scheme for air pollution design solutions or mitigation measures based on the findings of the report shall be submitted to and approved in writing by the Local Planning Authority prior to development. This shall include mitigation for when air quality neutral transport and building assessments do not meet the benchmarks or if mitigation is not adequate then an air quality neutral offset payment may be agreed.

The approved design or mitigation scheme shall be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with Policy CC4 of the London Borough of Camden Local Plan 2017 and Policy SI1 of the London Plan 2021.

4 Air Quality Monitoring

No demolition or development shall commence until air quality monitoring has been implemented on site, and the following have been complied with:

- a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA’s Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;
- 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.
- 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: To safeguard the amenity of adjoining premises and the area generally, to 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 the requirements of policies A1, A4, and CC4 of the London Borough of Camden Local Plan 2017 and policy SI1 of the London Plan 2021.

5 Written scheme of investigation

No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and:

- a) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
- b) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Reason: In order to safeguard the significance of heritage assets within the borough in accordance with the requirements of Policies D1 and D2 of the London Borough of Camden Local Plan 2017.

6 London Underground Protection

The development hereby permitted shall not be commenced until detailed design, method statements and load calculations (in consultation with

London Underground), have been submitted to and approved in writing by the local planning authority which:

- a) Provide a technical submission that demonstrates that there will be no impact on the Central Line tunnels through ground movement from any change of loading.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with Policy T3 of the London Plan 2021 and Policy T3 of the London Borough of Camden Local Plan 2017.

Pre-start conditions (other than demolition or site clearance)

7 Detailed design drawings and samples

Notwithstanding the details shown on the approved plans, prior to commencement of works (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) Coloured elevations and section drawings of all elevations of the rear extension at a scale of 1:20, including annotations of materials;
- 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 on site to include typical window with all neighbouring materials and details;
- 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 policies D1 and D2 of the London Borough of Camden Local Plan 2017.

8 Mechanical Ventilation Details

Prior to commencement of development (other than demolition and site clearance), full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the boiler/ CHP stack or any other emission sources and as close to roof level

as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with Policy CC4 of the London Borough of Camden Local Plan 2017 and policy SI1 of the London Plan 2021.

9 Air Source Heat Pump Details

Prior to commencement of above ground works (other than demolition and site clearance), details, drawings, and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more, or SCOP of 3.4 or more), details of the refrigerant proposed (expected to be of low global warming potential unless otherwise justified), and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.

10 Active cooling

Prior to commencement of above ground works (other than demolition and site clearance), an overheating assessment including dynamic thermal modelling in line with the cooling hierarchy should be undertaken submitted to and approved by the Local Planning Authority in writing. The overheating assessment should demonstrate that measures to adapt to climate change have been considered and that overheating risk has been managed. It needs to demonstrate that the development has reduced cooling demand as far as possible and that the cooling hierarchy has been followed and any feasible measures shall be provided. If active cooling is justified proposals should consider the energy and environmental impact and details of proposed plant. Details including the energy efficiency and global warming potential of refrigerants, information on the building's cooling load and cooling demand shall have been submitted to and approved by the Local Planning Authority in writing. Measures and equipment shall be installed prior to first occupation in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure that all development reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with policy CC2 of the London Borough of Camden Local Plan 2017.

Prior to relevant works

11 Details of green or living roof

Prior to commencement of the relevant works, full details of the green/blue roof in the areas indicated on the approved roof plan '8918_P24E' shall be submitted to and approved in writing by the local planning authority. The details shall include:

- a) a detailed scheme of maintenance;
- b) sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used;
- c) full details of planting species and density.

The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2, and A3 of the London Borough of Camden Local Plan 2017.

12 Solar PV and green roofs

Prior to commencement of the relevant works, a feasibility assessment with the aim of maximising the provision of solar photovoltaics whilst retaining the approved green/blue roof should be submitted to the local planning authority and approved in writing. The building shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities and contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.

Compliance conditions

13 Cycle storage

Prior to occupation of the development hereby permitted, the cycle parking (as shown by drawing '8918_P12G') shall be provided in full, to provide 33 secure and covered cycle parking spaces. The cycle parking shall thereafter be retained solely for its designated use for the duration of the development.

Reason: To ensure adequate cycle parking is available on site, to promote sustainable modes of transport, and so safeguard the visual amenity of the area in accordance with policy T1 of the London Borough of Camden Local Plan 2017.

14 Roof materials of main building

Notwithstanding any indication given on the approved plans, any alterations to the main roof of the existing building hereby permitted (as shown by drawing '8918_P24E') shall be finished in roof tiles matching the existing roof.

Reason: To safeguard the appearance of the building and the character of the area in accordance with policies D1 and D2 of the London Borough of Camden Local Plan 2017.

15 Sustainable urban drainage system

The sustainable drainage system as approved (by drawings '8918_P24E' and 'Green/Blue Roof Proposal (prepared by Studio Moren)') shall be installed as part of the development to achieve 0.8 litres/second from the green/blue roof. The system shall include 8.5m³ blue roof capacity as stated in the approved drawings and shall thereafter retained and maintained in accordance with the approved maintenance plan.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017 and Policy SI13 of the London Plan 2021.

16 Non-road mobile machinery (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 safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017.

17 Noise limits for plant

The external noise level emitted from plant, machinery or equipment at the development, with any specified noise mitigation hereby approved, shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest 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 site and surrounding properties is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

18 Anti-vibration isolators for plant

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.

19 Demolition waste

The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017 and Policy SI 7 of the London Plan 2021.

20 No additional external 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 Roof terraces

No flat roofs within the development shall be used as terraces/amenity spaces unless marked as such on the approved plans, without the prior approval in writing of the Local Planning Authority.

Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy A1 of the London Borough of Camden Local Plan 2017.

2018/3834/L – Listed Building Consent

1 Time limit

The works hereby permitted shall be begun not later than the end of three years from the date of this consent.

Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2 Approved drawings

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

Existing Drawings:

(8918-): L01; L02; L03; L04; L05A; L06; L07D; L08C; L09A; P09.

Demolition Drawings:

(8918-): P25B; P26B; P27A; P28A; P29A; P30D; P31; P32; P33A; P34; P35A.

Proposed Drawings:

(8918-): P11D; P12G; P13D; P14D; P15D; P16D; P17E; P18H; P19F; P20F; P21G; P22H; P23E; P24E; Green/Blue Roof Proposal (prepared by Studio Moren).

Documents:

Structural Assessment Ref: 2892-16_Rev.C (prepared by Partington & Associates Ltd, dated 23/06/2018); Heritage Statement Ref: 2941 (prepared by Heritage Collective, dated May 2018); Archaeological Desk-based Assessment (prepared by Thames Valley Archaeological Ref: HHL16/205 (TQ 3046 8149), dated December 2016).

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the London Borough of Camden Local Plan 2017.

3 Work to match existing

All work of making good shall be carried out to match the existing adjacent work as closely as possible in materials and detailed execution.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the London Borough of Camden Local Plan 2017.

19. INFORMATIVES

2018/3833/P – Full Planning Permission

1	<p>Community Infrastructure Levy</p> <p>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.</p>
2	<p>Building regulations</p> <p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
3	<p>Party Wall</p> <p>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.</p>
4	<p>Camden Minimum Requirements</p> <p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319 or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444).</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
5	<p>Public Highway</p>

	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
6	<p>Advertisement consent</p> <p>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.</p>
7	<p>Legal Agreement</p> <p>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.</p>
8	<p>Construction air-quality impacts</p> <p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>
9	<p>Thames Water</p> <p>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.</p> <p>Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to the Thames Water website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services</p> <p>A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without</p>

	<p>a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwgriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.</p>
10	<p>Written scheme of investigation</p> <p>The written scheme of investigation required by condition will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p>
11	<p>Biodiversity Net Gain – Exemption</p> <p>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:</p> <p>(a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below.</p> <p>Based on the information available, this will not require the approval of a BGP before development is begun the planning application was made before 12 February 2024.</p> <p><u>Summary of statutory exemptions for biodiversity gain condition:</u></p> <ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> - 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

	<p>biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).</p> <ul style="list-style-type: none"> - 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	<p>Biodiversity Net Gain</p> <p><u>Irreplaceable habitat:</u></p> <p>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.</p> <p><u>The effect of section 73(2D) of the Town and Country Planning Act 1990:</u></p> <p>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 the post-development value of the onsite habitat, or any arrangements made to compensate irreplaceable habitat, as specified in the earlier BGP.</p> <p><u>Phased development:</u></p> <p>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</p>

2018/3834/L – Listed Building Consent

1	<p>Building Control</p> <p>You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.</p>
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Planning Committee

03 April 2025

2018/3833/P & 2018/3834/L

212-214 High Holborn
London
WC1V 7BW

