

	Fox Court, 14 Gray's Inn Road London WC1X 8HN		3
Application Number(s):	2023/5130/P	Officer: Elaine Quigley	
Ward:	Holborn and Covent Garden		
Date Received:	04/12/2023		
Proposal:	Demolition of existing facades, retaining existing reinforced concrete frame and basement structures; refurbishment and reconfiguration of the existing office (Use Class E) building for continued office use including extensions with new facades to the west elevation fronting Gray's Inn Road (9 storeys), to the northern courtyard elevation facing Brookes Court (9 storeys), to the existing 5 storey north-east wing fronting Brook Street (3 storeys) and to the south elevation (8 storeys); external alterations, provision of rooftop amenity terraces, landscaping and associated works		
<p>Background Papers, Supporting Documents and Drawing Numbers:</p> <p>Existing Drawings: 1195-BGY-XXX-XXXX-DR-A-04010 rev A; 1195-BGY-XXX-XXXX-DR-A-04011 rev A; 1195-BGY-XXX-098B-DR-A-04098 rev A; 1195-BGY-XXX-099B-DR-A-04099 rev A; 1195-BGY-XXX-100L-DR-A-04100 rev A; 1195-BGY-XXX-101L-DR-A-04101 rev A; 1195-BGY-XXX-102L-DR-A-04102 rev A; 1195-BGY-XXX-103L-DR-A-04103 rev A; 1195-BGY-XXX-104L-DR-A-04104 rev A; 1195-BGY-XXX-105L-DR-A-04105 rev A; 1195-BGY-XXX-106L-DR-A-04106 rev A; 1195-BGY-XXX-107L-DR-A-04107 rev A; 1195-BGY-XXX-108L-DR-A-04108 rev A; 1195-BGY-XXX-109L-DR-A-04109 rev A; 1195-BGY-XXX-120S-DR-A-04120 rev A; 1195-BGY-XXX-125S-DR-A-04125 rev A; 1195-BGY-XXX-124S-DR-A-01204 rev A; 1195-BGY-XXX-127S-DR-A-01207 rev A; 1195-BGY-XXX-300E-DR-A-04130 rev A; 1195-BGY-XXX-300E-DR-A-04131 rev A; 1195-BGY-XXX-300E-DR-A-04132 rev A; 1195-BGY-XXX-300E-DR-A-04133 rev A; 1195-BGY-ZZZ-208S-DR-A-01208 rev A.</p> <p>Demolition Drawings: 1195-BGY-XXX-098B-DR-A-04198 rev A; 1195-BGY-XXX-099B-DR-A-04199 rev A; 1195-BGY-XXX-100L-DR-A-04200 rev A; 1195-BGY-XXX-101L-DR-A-04201 rev A; 1195-BGY-XXX-102L-DR-A-04202; 1195-BGY-XXX-103L-DR-A-04203 rev A; 1195-BGY-XXX-104L-DR-A-04204 rev A; 1195-BGY-XXX-105L-DR-A-04205 rev A; 1195-BGY-XXX-106L-DR-A-04206 rev A; 1195-BGY-XXX-107L-DR-A-04207 rev A; 1195-BGY-XXX-108L-DR-A-04208 rev A; 1195-BGY-XXX-109L-DR-A-04209 rev A; 1195-BGY-XXX-230E-DR-A-04230 rev A; 1195-BGY-XXX-231E-DR-A-04231 rev A; 1195-BGY-XXX-231E-DR-A-04232 rev A; 1195-BGY-XXX-231E-DR-A-04233 rev A.</p> <p>Proposed Drawings: 1195-BGY-XXX-098B-DR-A-04298 rev A; 1195-BGY-XXX-099B-DR-A-04299 rev A; 1195-BGY-XXX-100L-DR-A-04300 rev B; 1195-BGY-XXX-101L-DR-A-04301 rev B; 1195-BGY-XXX-102L-DR-A-04302 rev B; 1195-BGY-XXX-103L-DR-A-04303 rev B; 1195-BGY-XXX-104L-DR-A-04304 rev B; 1195-BGY-XXX-105L-DR-A-04305 rev B; 1195-BGY-XXX-106L-DR-A-04306 rev B; 1195-BGY-XXX-107L-DR-A-04307 rev B; 1195-BGY-XXX-108L-DR-A-04308 rev B; 1195-BGY-XXX-109L-DR-A-04309 rev B; 1195-BGY-XXX-320S-DR-A-04320 rev B; 1195-BGY-XXX-325S-DR-A-04325 rev A; 1195-BGY-ZZZ-XXXX-DR-A-20204 rev A; 1195-BGY-XXX-330E-DR-A-04330 rev B; 1195-BGY-XXX-331E-DR-A-04331 rev B; 1195-BGY-XXX-332E-DR-A-04332 rev B; 1195-BGY-XXX-333E-DR-A-04333 rev B; 1195-BGY-XXX-334E-DR-A-04334 rev A; 1195-BGY-XXX-335E-DR-A-04335 rev A; 1195-BGY-XXX-336E-DR-A-04336 rev A; 1195-BGY-XXX-337E-DR-A-04337 rev A; 7267-MTT-ZZ-B1-SK-MEP-2000 rev P1; FCP667-AL-SK-025; 1195-BGY-ZZZ-XXXX-DR-A-20207 rev A; WIE-19467-SA-0006-P02 rev P02; 1195-BGY-ZZZ-208S-DR-A-20208 rev A.</p> <p>Documents:</p>			

Financial Viability Assessment prepared by DS2 dated 28/08/2025; Heritage, Townscape and Visual Impact Assessment Addendum prepared by The Townscape Consultancy dated August 2025; Design and Access Statement Addendum prepared by Buckley Gray Yeoman dated 20/07/2025; Landscape Design Statement prepared by Grant Associates dated October 2023; Tree Survey Report prepared by Tetra Tech dated August 2025; Arboricultural Impact Assessment prepared by Tetra Tech Limited dated August 2025; Archaeological Desk-based Assessment prepared by Hawk Heritage dated October 2023; Operational Waste Management Strategy prepared by Waterman Infrastructure and Environmental Limited dated November 2023; Preliminary Contamination Risk Assessment rev 2 prepared by GEA dated October 2023; Environmental Noise Survey and Noise Impact Assessment Report prepared by Quantum Acoustics dated October 2023; Planning Fire Statement prepared by The Fire Surgery dated July 2025; Statement of Community Involvement prepared by Lowick dated November 2023; Bat Survey Report prepared by Aven Ecology dated October 2023; Biodiversity Report and Ecological Management Plan prepared by Aven Ecology dated October 2023; Biodiversity Report and Ecological Management Plan Addendum prepared by Aven Ecology dated July 2025; Preliminary Ecological Appraisal prepared by Aven Ecology dated October 2023; The Biodiversity Metric 4.0 – Calculation Tool; Flood Risk Assessment prepared by Elliott Wood dated 31/07/2025; Circular Economy Statement prepared by Sustainable Building Services Solutions dated July 2025; Whole Life-Cycle Carbon Report prepared by Sustainable Building Services Solutions dated July 2025; Energy and Sustainability Statement prepared by Sustainable Building Services Solutions dated July 2025; Daylight and Sunlight Statement prepared by Point 2 dated October 2023; Daylight and Sunlight Statement prepared by Point 2 dated August 2025; Daylight and Sunlight Technical Note prepared by Point 2; Overshadowing Studies prepared by Point 2 dated October 2025; Air Quality Assessment Revision A prepared by Create Consulting Engineers Ltd dated October 2023; Transport Assessment Addendum prepared by Waterman Infrastructure & Environment Ltd dated October 2025; Delivery and Servicing Plan prepared by Waterman Infrastructure & Environment Ltd dated November 2023; Framework Travel Plan prepared by Waterman Infrastructure & Environment Ltd dated November 2023; Drainage Strategy prepared by Elliott Wood dated 31/07/2025; Preliminary Contaminated Ris Assessment prepared by GEA dated October 2023; Employment, Training and Regeneration Statement prepared by General Projects and AND London dated November 2023; Access Statement prepared by David Bonnett Associates dated November 2023.

RECOMMENDATION SUMMARY: Grant conditional Planning Permission subject to Section 106 Legal Agreement

Applicant:	Agent:
C/O	DP9 100 Pall Mall London Borough SW1Y 5NQ

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Class E	Offices	14,287	22,544	+8,257
Class E	Cafe	0	57	+57

Total	All uses	14,287	22,601	8,314
Parking details				
Car Type	Existing spaces	Proposed spaces	Difference	
Car - General	26	0	-26	
Car - Disabled accessible	0	1	+1	
Cycle Type	Existing spaces	Proposed spaces	Difference	
Cycle – offices long stay	0	394	+394	
Cycle – short stay (all uses)	0	17	+17	

EXECUTIVE SUMMARY

- i) The site is a largely vacant office building from the 1960's with some alterations carried out in the 1970's. It is located within the Central London Area where growth is expected to happen.
- ii) The application is to retain the office use and to extend the building to the north towards Brookes Court, Baldwin Gardens filling in the open courtyard area at the northern side of the building, and extending upwards. The majority of the existing building structure would be retained under the proposals.
- iii) In 2013 there was a previous application on this site for the erection of a 4 storey building within the courtyard area for retail and office purposes. This was granted, however, it was never implemented and has now expired.
- iv) The significant increase in employment floorspace is welcomed and supported by planning policy as it is bringing a recently vacant building back into use and optimizing the site density in a highly accessible location. Given the significant floorspace uplift proposed, the development is required to make a contribution towards the delivery of self-contained housing. Officers accept that it would not be practicable to provide the housing requirement on site, therefore that a payment in lieu of the required housing is appropriate. A payment in lieu of on-site housing of £3,000,000 has been negotiated, which equates to just under the 50% of the full policy H2 compliant amount. Whilst it is disappointing that the full affordable housing payment is not being made, taking account of the viability circumstances of the scheme, as we are required to do by policy, officers consider that this is acceptable.
- v) The development has been carefully designed and the facades treated to respect and respond to its differing contexts. The design and scale of the building would cause less than substantial harm to the setting of the Bloomsbury Conservation Area when viewed from South Square. Given the heritage asset is assessed as a whole, the level of harm is at the lowest end of less than substantial harm. In this respect there is conflict with development plan Policy D2 of the Local Plan and HC1 of the London Plan. Considerable weight must be given to that harm and paragraph

215 of the NPPF requires this harm to be weighed against the public benefits of the proposal. The public benefits that would be delivered by the scheme are set out in full in the conclusion, but include a number of environmental benefits (retention of parts of the building, improvements to the architectural quality of the building and public realm improvements); social benefits (a contribution of £3,000,000.00 towards the delivery of affordable housing in the borough and a significant package of employment, training and community benefits), and economic benefits (creating more employment opportunities). Officers consider the heritage harm identified would be outweighed by the benefits.

- vi) The proposed development would result in some noticeable impacts on the daylight and sunlight levels of surrounding properties, but most would be commensurate with the local context and the nature of Central London as it continues to support growth and effective use of land. However, there are some major adverse impacts, most notably to two living spaces in no. 33 Brooke Street. The impacts are significant and considered to be in conflict with policy A1 which seek to protect the amenity of communities and neighbours. However, considering the benefits of the scheme (listed in full below), officers consider that on balance the impact on light is acceptable and in compliance with the development plan as a whole.
- vii) Likewise, there would be a notable impact from the scheme in terms of overshadowing on Baldwins Gardens community amenity space and Brookes Street Market with less than 50% of these spaces seeing at least 2hrs of direct sunlight on 21 March, contrary to BRE guidance. However, when looking at the impacts across April to June, it can be seen that the spaces achieve BRE compliance with the sunlight levels rising significantly throughout April, May, and June. Considering UK growing seasons, the greatest impacts would be over winter when many plants are dormant. Nevertheless, there may be impacts on planting in Baldwins Gardens amenity space and it is therefore considered necessary to secure a contribution of £71,750 to mitigate these impacts and allow for adaptation and replanting in the amenity space to ensure there is not a major adverse impact on the quality of the space and its value as an amenity space for the residents of Brookes Court, Baldwins Gardens. A contribution of £30,750 towards public realm improvements in Brooke Street Market would also be secured (£102,500 in total).
- viii) This proposal delivers a high-quality, contextual building that significantly improves on the existing structure through a retention-focused approach, minimising carbon impact and maximising reuse. The enhanced ground floor, which will be redesigned elevates the pedestrian experience and enhances security along Gray's Inn Road. New façades, employing quality materials and intricate detailing, respond to local character, while taller upper storeys are carefully designed to respect views and heritage assets. Driven by sustainability objectives, the design targets low carbon emissions, adaptable structures, and encourages sustainable transport.
- ix) The scheme would deliver substantial land use, employment and economic benefits, including a significant payment towards housing and the public realm. The design of the building extensions and alterations is considered to represent high-quality architecture. The public realm improvements are also substantial

benefits. Landscaping improvements are also proposed to the front of the building which will create a much more inviting and welcoming environment. The greening of the terraces on the northern side elevation of the building will preserve the amenity of the neighbouring housing estate at Brookes Court.

- x) Overall, although there would be conflicts with certain parts of the development plan, notably policies A1 and D2 of the Local Plan, there are a number of public benefits that would be delivered by the proposals, and on balance, the proposals would comply with the development plan as a whole. It is therefore recommended that planning permission be granted.

OFFICER REPORT

Reason for Referral to Committee:

Major development involving the provision of more than 1,000 sqm of non-residential floorspace [Clause 3(i)]

The application involves the making of an obligation or agreement under Section 106 of the Town and Country Planning Act 1990 or other legislation (“the obligation”) that secures more than £50,000 of financial contributions or other public benefits of estimated equivalent capital value [Clause 3(iv)]

1. SITE AND BACKGROUND

Designations

- 1.1 The following are the most relevant designations or constraints:

Designation	Details
SALP Area Policies	Holborn and Covent Garden Area
SALP Knowledge Quarter	Knowledge Quarter Innovation District
Local Plan Growth Area	Holborn
Designated Centres	Central London Area
Business Improvement District	Hatton Garden
Strategic View Background	Background Consultation Area From Blackheath Point and Greenwich Park
Strategic Viewing Corridor	View from Primrose Hill to St Pauls
Contaminated Sites Potential	Medium Risk
Archaeological Priority Area	Tier II
Article 4 Land Use	Change of use to residential requires permission
Article 4 Basement	Basement requires planning permission
PTAL (Public transport accessibility)	6b (highest)

Underground development constraints and considerations	- Subterranean (groundwater) flow - Slope stability
CMP Priority Area – Cumulative Impact	South of Euston Road

Table 1 - Site designations and constraints

Description

- 1.2 The site comprises a ‘U-shaped’ multi-let office building (Use class Ec(i)) which has a GIA of 14,287 sq. m (15,686 sq. m GEA) and a 1,212 sq. m open external courtyard to the north. The existing offices are part vacant and part tenanted by an occupier on the ground floor.
- 1.3 The existing building comprises two wings, facing onto Gray’s Inn Road and Brooke Street, with a connecting main element spanning the two facades, framing a large central courtyard space. The main connecting element of the building is ground plus 7-8 floors of office with roof plant and the two wings are ground plus 4 floors. The main courtyard space to the north measures approximately 1,100 sq. m and houses two external staircases; existing fire escapes provide egress from the courtyard into the pedestrian areas of Brookes Court. At ground floor there is no activity or engagement with the streets around the building other than a vehicular service entrance on Brooke Street, which provides access to the existing loading bay, refuse area, UKPN sub-stations and ramp to a basement car park. The service yard also provides ramped access to the basement car park which currently provides 26 car parking spaces.

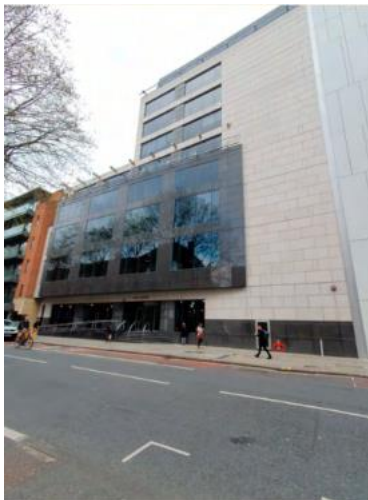


Figure 1 – Existing elevation fronting onto Gray’s Inn Road

- 1.4 Architecturally the building is of limited townscape value. On Gray’s Inn Road, the dark grey stone façade and recessed entrance combined with ramps and balustrading creates a defensive interface with the street. On Brooke Street there is limited activation and areas of large blank façade.
- 1.5 On the southern side of the site is the recently developed building of 150 Holborn, a large 8 storey commercial building with a separate residential

element on Brooke Street. The residential block on Brooke Street steps down from 7 storeys to 5 storeys and comprises 13 new residential units.

- 1.6 To the east is Brookes Market, which is identified as public open space and overlooked by the residential blocks fronting Beauchamp Street, Brookes Market and Dorrington Street. Brookes Market has a strong character which comes from a series of brick buildings whose frontages directly address the central open space and its mature trees, but the south side of Brookes Market and Brooke Street are dominated by the inactive frontages of the Waterhouse Square development and suffer in terms of their environmental quality as a result.



Figure 2 – Existing elevation fronting Brooke Street

- 1.7 To the north west of Fox Court is 24-28 Gray's Inn Road, a 6 storey mixed use development with commercial uses on the ground floor and 14 residential units above. To the north of the courtyard is Brookes Court accessed off the south side of Baldwin's Gardens which comprises low density residential dwellings and community uses including Holborn Mosque, principally one and two storey buildings with rear gardens. Also to the north is a 5 storey residential block fronting Brooke Street with the St Alban and Martyr Church (Grade II*) beyond. To the east is Waterhouse Square (formerly the Prudential Insurance Building) which is Grade II* listed.
- 1.8 Other heritage assets in the vicinity, are the 2 conservation areas in between which the site is located, namely Bloomsbury Conservation Area to the west side of Gray's Inn Road and Hatton Garden Conservation Area to the east of Brooke Street. Within Gray's Inn complex to the west are a number of listed buildings including the Hall (Grade I), The Chapel (Grade II) and Statue of Francis Bacon (Grade II) all set within the Grade II* Gray's Inn Registered Park and Garden.
- 1.9 The area surrounding the site is mixed, including residential, office, retail, and community uses which is typical of its Central London location. Further

to the west are a large number of jewellery businesses in Hatton Garden which has developed a reputation as London's Jewellery Quarter.

- 1.10 The site has 'excellent' public transport connections, with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). Chancery Lane underground station is located approximately 90 metres to the south of the site and Farringdon Thameslink and underground stations are located approximately 650 metres to the east. In addition, the site is well served by regular bus services along Gray's Inn Road.

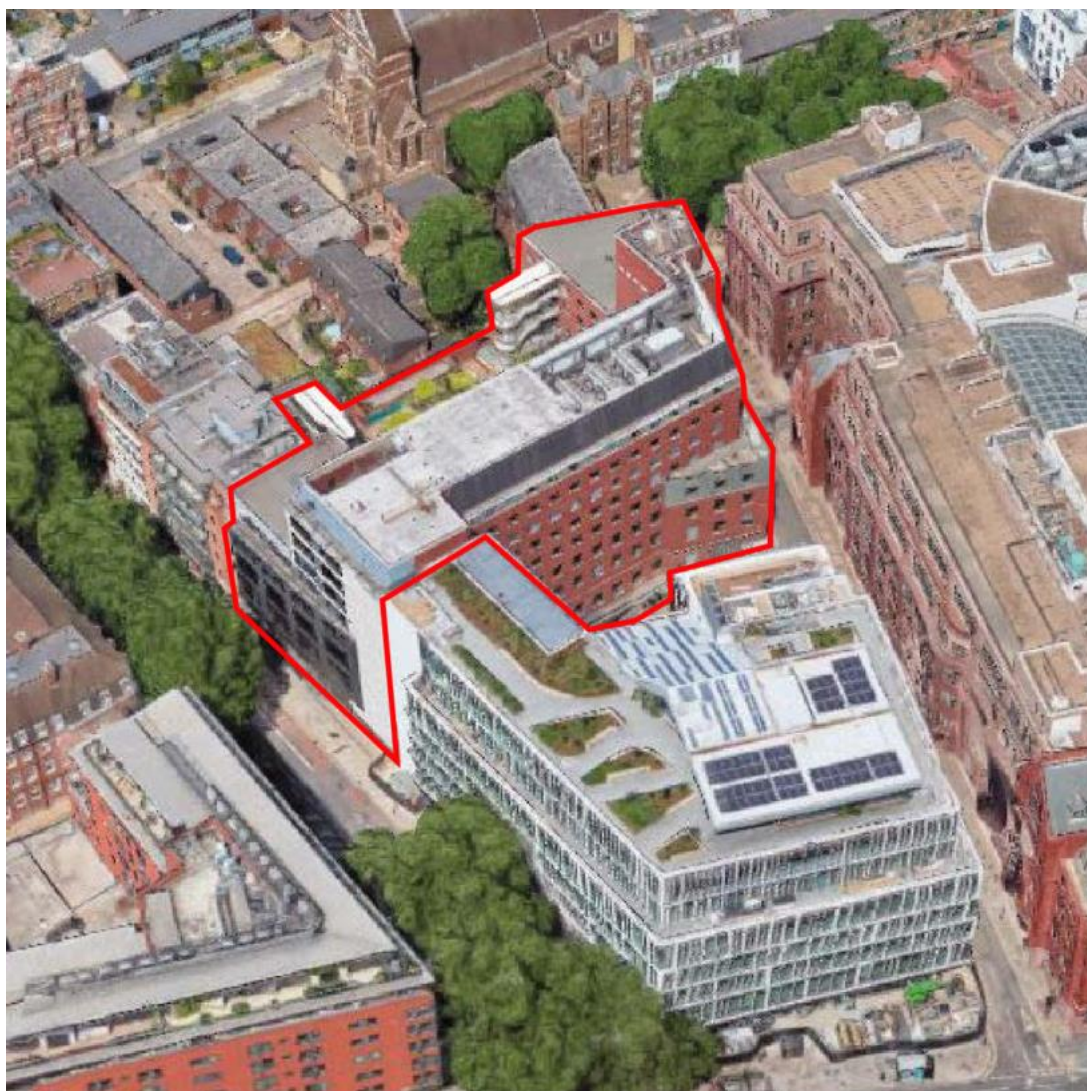


Figure 3 – The existing site

2. THE PROPOSAL

- 2.1 As part of the proposals, the frame of the existing office building would be retained and the building would be remodelled with new facades, refurbished and extensions at the upper floor levels and roof level. The proposal also includes infilling the existing courtyard area. The existing building has a total floor area of 14,287 sq. m (GIA). The proposals have a floor area of 22,601 sq. m (GIA) – an increase in floor space of 8,314 sq. m. This would include 8,257 sq. m of new office floor space with 831.4 sq. m of affordable workspace at basement and ground floor levels. A new independent retail

unit would also be created measuring 57 sq. m. A visualisation of the proposals is shown in figure 4 below.

2.2 The proposals include the following:

- Retrofit and extension of the existing office building to provide additional office accommodation with a separate café that creates an uplift in Class E use commercial space of 8,314 sq. m (GIA).
- Retention of the existing reinforced concrete frame, the ground floor slab and basement structure.
- Extensions to the west, north and south elevations of the building with new facades.
- Erection of an 8 storey extension on the southern elevation of the building to create a continuous built form.
- To the north it is proposed to extend the footprint of the building over the existing central courtyard area to create a stepped part 1 to 8 storey extension. The set back roofs of the extensions would incorporate stepped terrace areas at each of the floor levels.
- Extension to the northeast corner of the building from 4 storeys to 8 storey's
- Provision of a central atrium space between the existing structure and the northern extension would allow for internal circulation and rooftop amenity spaces for future tenants as well as urban greening.

2.3 The proposal would also include the removal of 26 car parking spaces in the basement and provision of 394 cycle parking spaces as well as servicing at basement level. The existing vehicle ramp within the existing service area to the south of the building would be repurposed and would be of sufficient width for use by cycle traffic. Employees would wheel their bikes up / down the ramp. An existing lift would provide access from the ground floor to the basement cycle store for larger / adapted cycles.

2.4 Plant would be installed at roof level and basement levels. The proposed façade would be split into two with the higher elevation relating to the larger scale of 150 Holborn to the south. The smaller more subservient portion would allow the building to transition towards the smaller scale 6 storey buildings to the north.



Figure 4: Visual of proposed development

Revisions

2.5 The application was revised during the course of the application to make a number of changes to the height and design of the front façade of the building as well as the proposed roof extension. A comparison of the originally submitted scheme and the revised proposals can be seen in figure 5. The revisions included the following:

- Setting back of plant screen wall at rooftop level fronting Brooke Street by 1m.
- Amendments to the Level 08 terrace layout and hard and soft landscaping plan.
- Amendments to principle façade fronting Gray's Inn Road, including amendments to the articulation and materiality, alongside pulling the building line back so the entirety of the façade aligns with the adjoining buildings at 26 and 33 Gray's Inn Road immediately to the north and south respectively (loss of 43 sq. m NIA per floor).
- Amendments to the ground floor of the Gray's Inn Road façade, including the loss of the colonnade, rearranged entrance with main doors repositioned from the as submitted position, and the introduction of planters at ground floor level.
- The delivery of additional public realm (equating to an increase of approximately 38 sq. m) fronting Gray's Inn Road, achieved through the removal of the existing ramp and staircase.



Figure 5: Originally submitted proposals (left) and revised proposals (right)

4. RELEVANT HISTORY

The site

- 4.1 **2013/0786/P** – Erection of a 4 storey infill extension in the existing courtyard providing a new retail unit (Class A1) on the ground floor and office floorspace (Class B1a) on the first second and third floors and associated refurbishment of the building including the addition of a new entrance, curtain wall glazing, granite panels and replacement of the existing entrance to the west elevation new plant on the roof of the Annex and the installation of photovoltaic panels at roof level in connection with existing office use (Class B1a). **Granted 23/05/2013**. This permission was not implemented and expired on 14/05/2016.
- 4.2 **2012/5647/P** - Installation of 6 no. louvres, (2 no. to Courtyard elevation and 4 no. to return side elevation in connection with existing offices use (Class B1a). **Granted 14/12/2012**.
- 4.3 **2012/4667/P** - Change of use of part of the ground floor to rear from office use (Class B1) to dual use as offices (Class B1) and appeals and tribunal services (Sui Generis). **Granted 22/11/2012**.

- 4.4 **2011/4481/P** – Installation of entrance door and canopy to Brooke Street frontage at ground floor level to existing office (Class B1). **Granted 02/11/2011.**
- 4.5 **PSX0204792** - Change of use of the 4th and 5th floor from office (Class B1) use to dual use as offices (Class B1) and appeals and tribunal services (sui generis). **Granted 01/08/2002.**
- 4.6 **9401522** - Refurbishment of the building including the demolition of a 4 storey computer block and the creation of a landscaped courtyard the insertion of windows to the south and east elevations the recladding of the west elevation and the erection of small extensions at second, third and fourth floor levels to provide new office accommodation. **Granted 26/01/1995.** The permission was implemented as the courtyard was created within the northern section of the site and the 4 storey computer block has been removed.

The area

- 4.7 150 Holborn
2016/2094/P - Demolition of existing buildings and redevelopment for mixed use development up to nine storeys in height comprising 12,862 sqm GIA office floorspace (Use Class B1), 1,480 sqm GIA retail floorspace (Use Class A1-A3), 13 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works. **Granted subject to s106 legal agreement 25/06/2018**

- 4.8 2 Waterhouse Square
2023/3419/P - Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) at 2 Waterhouse Square including external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works. **Granted subject to s106 legal agreement 05/02/2025**

- 4.9 24-26 Gray's Inn Road
2012/0081/P - Erection of a 6 storey building plus basement level comprising of 14 self-contained residential units (4 x one bedroom, 8 x two bedroom and 2 x three bedroom) at first to fifth floor level (924sqm) and office floor space (Class B1) at basement and ground floor level (448sqm) following demolition of existing buildings. **Granted subject to s106 legal agreement 19/04/2012**

5. CONSULTATION

Statutory consultees

GLAAS (Greater London Archaeological Advisory Service)

- 5.1 Unlikely to have significant effect on heritage assets of archaeological interest.

Transport for London

5.2 No comments.

Thames Water

5.3 No objection subject to appropriately worded conditions to protect strategic sewer and informatives relating to groundwater discharge and water network.

Transport for London (TfL) Crossrail 2 Safeguarding

5.4 The application relates to land outside the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. No comments.

Local groups

Camden Cycling Campaign

5.5 Comments covering the following issues submitted in response to the original submission:

Cycle number and access improvements

- Pleased to see re-use of the existing ramp to provide access to the basement cycle store; this is much better than stair channels. Note that the lift will be available for those with mobility issues and that a cycle repair station will be included. Semi-vertical stands are not ideal but are a pragmatic solution and it is noted that there are a number of Sheffield stands in addition to spaces for adapted cycles.

Officer response

- *These comments are noted.*

Construction impacts

- Concerned about the impact of construction on the southbound lane on Gray's Inn Road which has segregated cycle lanes on both sides.
- Pleased that primary access for construction vehicles will be via Brooke Street so Gray's Inn Road should not be obstructed except for exceptional deliveries. The CMP should cover these exceptional situations and address how cyclists will be protected.
- Concerned about HGV's turning into Brooke Street. The documents show vehicles approaching from the west. It would be better if they approached along Holborn from the east. There should be a marshal at this junction.
- Note that planned works on the Waterhouse building (ref 2023/3419/P) will overlap with these works. The developers of Waterhouse Square also plan to use Brooke Street for access and works are scheduled from May 2025 to March 2027. This should be covered in the CMP with some discussion of the cumulative impact and how this will be minimized.

Officer response

- *A detailed Construction Management Plan (CMP) would be required prior to the commencement of development and secured by s106 legal agreement. The CMP would set out the arrangements for construction*

access, vehicle routing, timing of deliveries and loading, and measures to safeguard cycle routes on Gray's Inn Road. It would also be required to include procedures for managing any exceptional deliveries that may require temporary lane closures, including the use of traffic marshals to ensure the safety of cyclists and other road users. The CMP would further assess cumulative construction impacts and identify measures to coordinate and minimise disruption on Brooke Street and the surrounding highway network. Any works affecting Gray's Inn Road, including the management of the bus lane and cycle lanes or temporary traffic arrangements, would also be subject to agreement with Transport for London and the Council's Highways Team.

Adjoining occupiers

- 5.6 Five site notices were displayed surrounding the site on Brooke Street, Gray's Inn Road, Brookes Court and Brooke's Market. The notices were displayed on 05th January 2024 and the application was advertised in the local paper on 11th January 2024 (expiring 04th February 2024).
- 5.7 6 objections were received. Responses were received mainly from local residents in properties fronting onto Brooke's Market, Dorrington Street and Beauchamp Street.
- 5.8 Following the receipt of revisions to the proposals re-consultation was undertaken. A further five site notices were displayed on 03rd September 2025 and the application was advertised in the local paper on 04th September 2025 (expiring 28th September 2025). No further objections or comments were received.
- 5.9 The objections received by the Council are all published in full on the Council's website. The key issues raised are listed below.

Consultation

- Residents in Brookes Court, St Ursula's Lodge, Langdale House and The Beauchamp Building were not part of the consultation process.
- Application ignores make up of local area and fails to mention presence of many residential buildings located around Brookes Square Market.
- If representatives from 2 business groups attending the public exhibition is deemed to meet the criteria of meaningful consultation there are concerns about the level of scrutiny applied during the pre-application process and if this is considered as "good enough".
- Effects on The Lodge (St Mungo's) has been completely ignored who are vulnerable residents with very little voice in the community

Officer response:

- *Consultation was undertaken in accordance with the Town and Country Planning Act and LB Camden Statement of Community Involvement. This is documented in para 5.13 and 5.15 above. The consultation requirements have been observed by the Council and all consultation responses received until the publication of this report have been taken*

into consideration.

- *The applicant's Statement of Community Involvement (SCI) outlines the engagement undertaken prior to submission, including a public exhibition, dedicated website, and discussions with local businesses and stakeholders. While it is acknowledged that some nearby residential properties may not have been directly represented during the pre-application stage, all interested parties were able to comment through the statutory consultation process.*
- *The Lodge at St Ursula's, St Mungos is located at 16 Brooke Street and was identified as being part of the pre-application consultation mail drop inviting local residents to attend the public exhibition.*

Local Plan policy conflicts

- *Conflict of "green policies" over re-development of the commercial building located in the middle of a large residential area as demolition would undoubtedly generate enormous carbon footprint in the short term*

Officer response:

- *The Council recognises the importance of sustainable development and the need to minimise carbon emissions. The applicant has submitted a Circular Economy Statement and Whole Life-Cycle Carbon assessment, which demonstrates that the proposed partial demolition and redevelopment strategy has been designed to balance the retention and reuse of existing materials with improvements to the building's operational energy efficiency and environmental performance. While the demolition phase will generate some short-term embodied carbon, the long-term operational carbon savings and improvements to energy performance are considered to outweigh these initial impacts.*

Impact on neighbouring amenity

- *Development will add to loss of light / sunlight.*

Officer response:

- *Officers acknowledge that there would be reductions exceeding BRE guidance thresholds at certain properties, notably at 33 Brooke Street, 24–28 Gray's Inn Road, and Brookes Court. At 33 Brooke Street, most transgressions are minor or affect secondary rooms, with the largest reductions associated with windows beneath existing balconies, which already constrain daylight. At 24–28 Gray's Inn Road, a number of rear-facing bedroom windows experience moderate to major reductions, although these are secondary rooms and the overall potential for daylight and sunlight remains acceptable. Within Brookes Court, only isolated rooms show minor or moderate transgressions, with the majority of rooms fully compliant. Taking into account the context of the existing built environment, the orientation of affected rooms, and the limited practical impact on primary living spaces, the proposed development is not considered to result in a materially harmful loss of light or sunlight to neighbouring occupiers. The properties surrounding Brooke's Market*

including The Lodge, St Mungos (35m away), Cranley Buildings (52m away), Langdale House (49m away), and the Beauchamp Building (74m away) would not be affected in terms of daylight and sunlight. Please see the amenity section for more detailed assessment. Refer to para 11.76 in the Amenity section for further details.

Sustainability

- Question need for demolition of external walls of the building. These could be kept and interior reconfigured. Demolition works are most immediate and damaging activities for the environment with a very high carbon footprint. Don't understand justification for demolition when brickwork looks in good repair.

Officer response:

- *A Pre-Redevelopment Audit prepared by the applicant concluded that a partial retention and refurbishment approach was the most appropriate and sustainable strategy, allowing some existing structure to be reused while enabling improvements to the building's layout, energy performance and public realm. The Statement adopts the targets reuse, recycling, or recover 95% of demolition waste and 100% of construction waste, and put 100% of excavation waste to beneficial use. A post-construction evaluation of this target would be secured by condition (condition 25).*

Construction impacts

- Noise, vibration and dust from demolition works is detrimental to health of the residential community especially people with breathing difficulties.
- Many people work from home and the noise will be a great disturbance.
- Removal of waste materials from the site during demolition period will mean a continuous stream of heavy lorries carrying skips, circulating around Brooke's Market throughout the day.
- The submitted CMP denies the existence of 2 Waterhouse Square planning application that was submitted in 2023 therefore cumulative impact of the 2 applications is not addressed at all.
- Cumulative impact of 2 developments would be overwhelming for the local community and notably its most vulnerable residents, not only in terms of noise and air pollution as well as traffic management issues during the anticipated works.
- Brooke Street is the only road available for residents living around the Brookes Market Square area to reach their homes. The CMP completely discounts local residents giving no consideration to their daily lives and emergency needs (access for deliveries, plumbers, or more worryingly for emergency services such as an ambulance). Suggesting trucks can turn around Brookes Market Square area is based on computer-based simulations and does not survive when confronted with the "on-the-ground" reality
- Air quality report discounts the impact of the construction site as negligible but is hard to believe when the local area is already

recognised as one of the worst areas in the country for air quality. Validity of the report is questioned when benchmark levels in the report were taken in 2021 (in middle of pandemic).

Officer response:

- *A construction management plan would be secured by S106 legal agreement, requiring the applicant to demonstrate how the development will minimise impacts from the movement of goods and materials during the construction process (including demolition works). The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The site is within the Cumulative Impact Area where Saturday working is not permitted, unless agreed with the Council.*
- *The CMP will be expected to consider overlapping construction programs on nearby sites to manage cumulative impacts from developments. A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction shall also be secured by the legal agreement.*
- *Measures will also include monitoring and mitigation of air quality and dust, with particular attention to sensitive receptors. Please see the amenity section for more detailed assessment.*

Impacts on health and wellbeing

- Many children live in the residential buildings near the proposed construction site. Living less than 50 metres away from 2 major building sites for another period of 2-3 years with a high level of noise in the background will undoubtedly affect their mental wellbeing again. This is clearly not a viable option
- Threats of accidents relating to numerous lorries frequently coming and going as children walk to school.
- Impacts on St Mungo's has been completely ignored as they need a quiet environment.
- Concerned about invisible and silent long-term effects of air pollution on children's lungs.
- In addition to residents with fragile physical health, there are families with young children living in the immediate vicinity and the residents of the Lodge are among the most vulnerable members of our community, many formerly homeless and with addiction issues.

Officer response:

- *The Council acknowledges the concerns raised regarding potential impacts on the health and wellbeing of local residents, including children, during the construction period. The Construction Management Plan (CMP), to be secured through a Section 106 legal agreement, will be required to set out measures to minimise noise, vibration, dust, and vehicle movements. These measures include the scheduling of deliveries and construction activity to avoid peak periods, management of traffic and construction vehicles to safeguard pedestrian routes, and*

implementation of dust and air quality mitigation in line with best practice and relevant guidance.

- *The CMP will also require monitoring and mitigation to reduce impacts on sensitive receptors, such as children, and will include a Construction Working Group to coordinate with the local community and respond to any issues that arise during construction. In addition, the site lies within the Council's Cumulative Impact Area, which imposes restrictions on working hours, including limits on Saturday working, to further reduce disturbance.*
- *Objections raised concerns about impacts on vulnerable residents including those at St Mungo's, but this type of impact associated with developments does not undermine the interests of those with protected characteristics to any significant and lasting effect so as to single out this group discriminately.*
- *The Construction Management Plan (CMP) would further assist vulnerable or disabled residents, ensuring the proposal does not conflict with the aims of the Public Sector Equality Duty.*

Activation of Brookes Market square

- Surprised the applicant is suggesting improving Brookes Market Square with additional seating and street furniture. Brookes Market is a very delicate area which has experienced anti-social behaviour, drug taking and used for night parties in the past. Removal of benches a few years ago improved this and there was a notable decrease in anti-social behaviour in the area. This took time and effort by all parties including Camden Council and Transport for London.

Officer response:

- *A financial contribution towards public realm improvements to Brookes Market Public Open Space would be secured by s106 legal agreement. Any future design proposals would be carried out in consultation with local residents*

6. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2024 \(NPPF\)](#)

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

London Plan 2021 (LP)

[GG1 Building strong and inclusive communities](#)

[GG2 Making the best use of land](#)

[GG3 Creating a healthy city](#)

[GG5 Growing a good economy](#)

[GG6 Increasing efficiency and resilience](#)

[SD1 Opportunity Areas](#)

[SD4 The Central Activities Zone \(CAZ\)](#)

[SD6 Town centres and high streets](#)

[SD7 Town centres: development principles and Development Plan Documents](#)

[D1 London's form, character and capacity for growth](#)
[D3 Optimising site capacity through the design-led approach](#)
[D4 Delivering good design](#)
[D8 Public realm](#)
[D9 Tall buildings](#)
[D10 Basement development](#)
[D11 Safety, security and resilience to emergency](#)
[D12 Fire safety](#)
[D14 Noise](#)
[H1 Increasing housing supply](#)
[E10 Visitor infrastructure](#)
[E11 Skills and opportunities for all](#)
[HC1 Heritage conservation and growth](#)
[HC5 Supporting London's culture and creative industries](#)
[HC6 Supporting the night-time economy](#)
[G1 Green infrastructure](#)
[G4 Open space](#)
[G5 Urban greening](#)
[G6 Biodiversity and access to nature](#)
[SI 1 Improving air quality](#)
[SI 2 Minimising greenhouse gas emissions](#)
[SI 3 Energy infrastructure](#)
[SI 4 Managing heat risk](#)
[SI 7 Reducing waste and supporting the circular economy](#)
[SI 12 Flood risk management](#)
[SI 13 Sustainable drainage](#)
[T2 Healthy Streets](#)
[T3 Transport capacity, connectivity and safeguarding](#)
[T4 Assessing and mitigating transport impacts](#)
[T5 Cycling](#)
[T6 Car parking](#)
[T6.5 Non-residential disabled persons parking](#)
[T7 Deliveries, servicing and construction](#)
[DF1 Delivery of the Plan and Planning Obligations](#)
[M1 Monitoring](#)

London Plan Guidance (LPG)

[Accessible London SPG](#)
[Optimising Site Capacity: A Design-led Approach LPG](#)
[Social Infrastructure SPG](#)
[London World Heritage Sites SPG](#)
[All London Green Grid SPG](#)
[Urban greening factor LPG \(February 2023\)](#)
[Air quality positive LPG](#)
[Air quality neutral LPG](#)
[Be Seen energy monitoring LPG](#)
[Circular economy statements LPG](#)
[Energy Planning Guidance](#)
[The control of dust and emissions in construction SPG](#)
[Whole life carbon LPG](#)
[Sustainable Transport, Walking and Cycling](#)

Local policy and guidance

Camden Local Plan (2017) (CLP) Policy

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

[Policy H2 Maximising the supply of self-contained housing from mixed-use schemes](#)

[Policy C3 Cultural and leisure facilities](#)

[Policy C5 Safety and security Policy](#)

[Policy C6 Access for all](#)

[Policy E3 Tourism](#)

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

[Policy A2 Open space](#)

[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)

[Policy A5 Basements](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[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 TC4 Town centre uses](#)

[Policy T1 Prioritising walking, cycling and public transport](#)

[Policy T2 Parking and car-free development](#)

[Policy T3 Transport infrastructure](#)

[Policy T4 Sustainable movement of goods and materials](#)

[Policy DM1 Delivery and monitoring](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Access for All CPG - March 2019](#)

[Air Quality CPG - January 2021](#)

[Amenity CPG - January 2021](#)

[Basements CPG - January 2021](#)

[Biodiversity CPG - March 2018](#)

[Community uses, leisure and pubs CPG - January 2021](#)

[Design CPG January 2021](#)

[Developer Contribution CPG - March 2019](#)

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

[Public open space CPG - January 2021](#)

[Transport CPG- January 2021](#)

[Trees CPG - March 2019](#)

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

Other guidance:

[Planning Statement - Intermediate Housing Strategy and First Homes \(2022\)](#)

[Holborn Vision Supplementary Planning Document \(SPD\) – January 2025](#)

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

[Hatton Garden Conservation Area \(2017\)](#)

[London View Management Framework SPG \(2012\)](#)

Draft Camden Local Plan

The Proposed Submission Draft Camden Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan will now be examined by a Planning Inspector.

Previously, the Council published the draft new Camden Local Plan for consultation in January 2024 and published an updated Proposed Submission Draft Camden Local Plan for consultation from 1 May to 27 June 2025.

The Proposed Submission Draft Local Plan is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to an emerging plan increases as it progresses towards adoption. In line with paragraph 49 of the National Planning Policy Framework (NPPF), the degree of weight to be given is a matter for the decision-maker, having regard to the stage of preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

7. ASSESSMENT

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

8	Consultation and procedure
9	Land use
10	Design and Heritage
11	Impact on neighbouring amenity
12	Transport
13	Accessibility
14	Sustainability and Energy
15	Air Quality
16	Flood risk and drainage
17	Refuse and Recycling
18	Landscaping, Trees, Greening and Biodiversity
19	Employment and training opportunities
20	Safety and Security
21	Contaminated Land

22	Fire Safety
23	Community Infrastructure Levy (CIL)
24	Conclusion
25	Recommendation
26	Legal comments
27	Planning Conditions
28	Planning Informatives

8. CONSULTATION AND PROCEDURE

Consultation

- 8.1 The local residents have raised concerns about the lack of consultation with local residents, particularly those from properties that surround Brookes Market, about the proposal prior to the submission of the application. They have advised that they were not aware of any formal meetings held by the applicant about the planning application.
- 8.2 The Council's Local Area Requirements (LAR's) advises when a pre-application consultation statement should accompany applications. This document is required with the submission of the following types of applications:
- Major developments
 - Developments in sensitive areas, such as conservation areas or areas of historic importance, that are likely to generate significant public interest.
- 8.3 The proposal falls within the definition of a major development (over 1,000 sq. m of non-residential floorspace) as it creates 8,314 sq. m (GIA) of floorspace. There is a statutory requirement for the applicant to submit a Statement of Community Involvement (SCI) setting out the pre-application consultation with various stakeholders, local councillors or local residents.
- 8.4 Six individual meetings were held during the pre-application process with representatives as detailed below:

Date	Stakeholder
	Pre-submission
22/11/2022	Meeting / site walkabout with Central District Alliance
03/07/2023	Meeting with Hatton Garden BID
17/08/2023	Meeting with Gamage's Tenant's and Residents Association
06/09/2023	Meeting with St Alban's CofE Primary and Nursey School
13/09/2023	Meeting with Leading Inclusive Futures through Technology
November 2023	Planned meeting with a Brooke's Court resident which did not go ahead. A call was arranged but resident unable to attend and no further response received prior to submission of the application
	Post-submission
Early 2025	Meeting with the Holborn Mosque.
April 2025	Key stakeholders were contacted to inform them about the revisions to the design of the proposed

building.

Figure 6 Pre-application process with representatives

8.5 The applicant's approach to wider consultation included an introductory newsletter and questionnaire that was distributed to 192 households and businesses in the surrounding area on 19th December 2022 seeking views on the existing building and key local issues and priorities. A public exhibition invitation was sent by post to 398 households and businesses in the local area on 30/03/2023. The Lodge at 16 Brooke Street (St Mungos) were included within the households notified. The applicant held a public exhibition on 07/06/2023 from 4pm to 7pm at The London Art Bar, 300 High Holborn. The session included background of the site, the applicant and presentations of the proposals along with questionnaires.

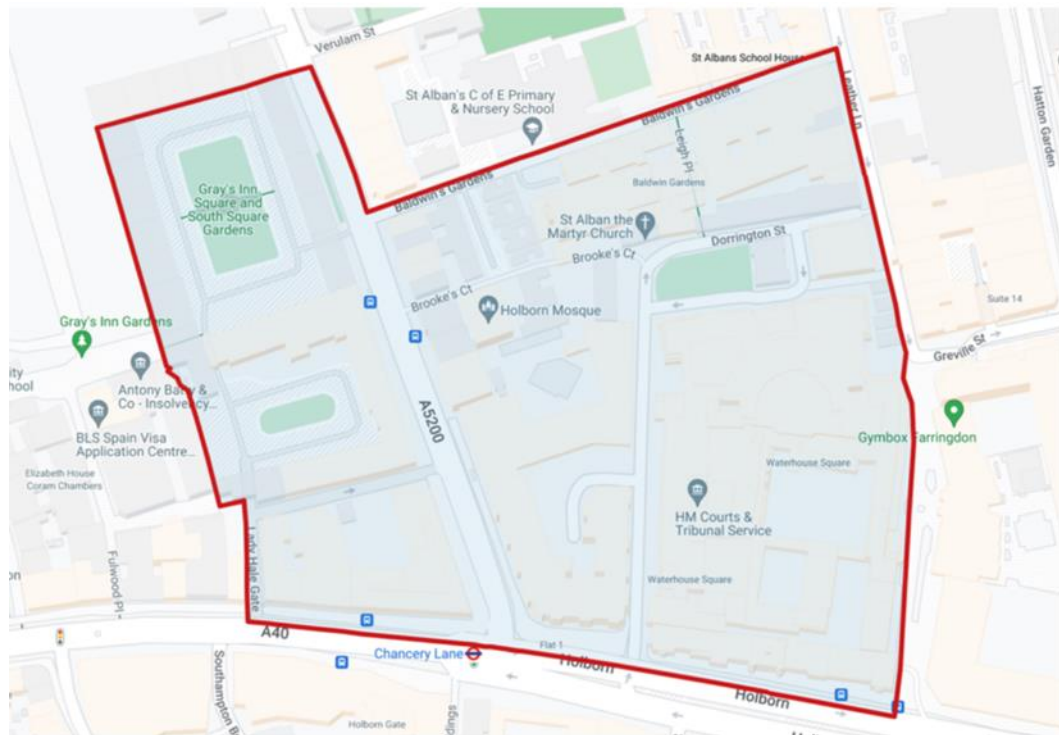


Figure 7 Distribution area for public exhibition invitation (Extract from applicant's Statement of Community Involvement)

9. LAND USE

Land use

9.1 The principal land use considerations are as follows:

- Introduction
- Existing office accommodation
- Increase in office floorspace
- Mixed use policy and residential use
- Viability and affordability
- Class E retail use
- Conclusion

Introduction

- 9.2 Under the proposals there would be an uplift in office floorspace as outlined in the table below:

Land Use Details:		
	Use Description	Floorspace (GIA sqm)
Existing	Class E office	14,287
	TOTAL	14,287
Proposed	Class E office	22,544
	Class E cafe	57
	TOTAL	22,601

Table 2: Existing and proposed uses

- Existing office accommodation
- 9.3 The existing building was constructed in the 1960's and the office accommodation therefore dates from this time. Despite refurbishment works that were undertaken in 1996, the existing accommodation has remained relatively unaltered with constrained floor to ceiling heights on the upper floors which is not well suited to modern office needs in terms of plan form and flexibility.
- Increase in office floorspace
- 9.4 Camden Local Plan policy E1 seeks to secure a successful and inclusive economy and encourages economic growth. Policy E2 encourages the provision of employment premises and sites. London Plan policy SD4 supports the enhancement and intensification of offices, to meet demand for a range of types and sizes of occupier and rental values, especially in the Central Activities Zone (CAZ).
- 9.5 Under the proposals there would be an increase in office accommodation from 14,287 sq. m to 22,601 sq. m (an uplift of 8,314 sq. m). The applicant estimates that the proposal would provide an additional 1,239 jobs on site.
- 9.6 The above policies support the provision of office use, provided other priority uses are provided such as housing (see 'Mixed use policy and residential use' section below). The proposed increase in office use is welcomed. The above policies require new employment space to be suitable for a range of business types and sizes including new businesses and small / medium enterprises (SME's).
- 9.7 The majority of the existing office floorspace is vacant with only a part of the ground floor occupied by a short term tenant. It is acknowledged that the premises could be made more suitable for modern office needs. The building is far from ideal for modern demands for flexibility in terms of its planform and specification. The Council's Inclusive Economy Team confirm that there is a demand for high spec offices in Central London. The proposed office floorspace would be flexible and more suitable for SME's.

Affordable Workspace

9.8 The proposal would provide 1,011 sq. m of affordable workspace at basement and ground floor levels which equates to 12% of the uplift in floorspace. The applicant intends to design the affordable workspace as maker space and target jewellery sector users first and foremost providing space for start-up, micro and freelance businesses. The event and gallery space identified on the ground floor would also be included in the affordable workspace quantum. Flexible exhibition space on the ground floor would be designed to enable the businesses to exhibit and sell products.

9.9 The site lies outside but in close proximity to the Hatton Garden specialist shopping area – approximately 165m to the east of the site. Policy H2 contains a specific policy approach to secure jewellery-related workspace in lieu of housing. Although this policy approach does not directly apply to this site, the Council’s Inclusive Economy Team consider that its location is sufficiently well related to the Hatton Garden jewellery cluster for there to be spillover demand for suitable premises. The proposed maker space at basement and ground floor level and associated exhibition area at ground floor level would be part of the affordable workspace provision (see figure 8 below) and would therefore support the ongoing vitality and growth of the jewellery industry in the wider area. The Inclusive Economy Team has reviewed the proposal and welcomes this approach in this location. The space would also become an important amenity for the wider Jewellery sector in Hatton Garden which lacks facilities and resources to exhibit and promote their products. This could include events such as wedding fairs or bespoke jewellery events. The affordable workspace would also include a shared open plan co working and gallery space. Tenants on the floor below will be given priority access for booking this space before it is available to others. The workspace in the basement would be adaptable to provide a series of small format workshops ranging from 14 sq. m to 22 sq. m that would be designed for individual businesses. This has been reviewed by the Council’s Inclusive Economy team and is welcome in this location.



Figure 8 Affordable workspace areas (shaded in blue) which includes gallery space (shaded in green)

9.10 The Employment Sites and Business Premises CPG advises that the Council will require the proposed jewellery workshop space to consist of cellular spaces of a range of sizes, including those of no more than approximately

30sqm each and marketed at rents that are demonstrably affordable for jewellery sector workshop occupiers. Small premises are necessary to ensure spaces are affordable to jewellery businesses.

- 9.11 The space would be rented at a discount of 20% on market rents for 10 years which is the benchmark in the Hatton Garden policy for jewellery workspace. This is acceptable providing the discount is applied to market rents for equivalent maker space in the area (not 20% discount on general office rents in the area). The applicant has indicated that the asking rent would be approximately £35 per sq. ft. This has been compared to existing marker space on the market and is at least 20% cheaper in terms of rental levels and is therefore considered acceptable. A marketing plan should be developed for the affordable jewellery workspace, setting out the sizes of the spaces and how the space will be marketed to jewellery sector businesses. It should also set out measures to ensure that service charges and other associated fees are affordable. The provision of the affordable workspace and a marketing plan would be secured by s106 legal agreement.
- 9.12 Given the significant employment benefits and the above obligations, the proposed increase in office use is welcomed, subject to the mixed use policy discussed below.

Mixed use policy and residential use

- Introduction
- 9.13 Residential is Camden's priority land use. This is reflected in local plan policy. Policy H1 of the London Plan sets housing targets for local authorities in London, for Camden the target is 1038 per year for the 10 year period. In order to ensure that housing targets are met Policy H1 states that boroughs should optimize the potential for housing delivery on all suitable and available brownfield sites through development plans and planning decisions. Policy H2 of the Local Plan which relates to mixed use development, seeks to ensure that housing forms a component of all schemes which result in an uplift in commercial floorspace of more than 200 sq. m (GIA), Policy H2 is triggered by this development proposal.
- 9.14 Policy H2 requires 50% of all additional floorspace to be residential in the Central London Area. The site is within the Central London Area. Policy H2 requires housing on site first and foremost, particularly where more than 1000 sq. m of additional floorspace is proposed. If it is demonstrated that this cannot be achieved, taking account of the criteria in (a) to (e) which include site constraints, the efficiency and economics of providing a mix of uses, then the applicant should provide housing off-site on a donor site. In exceptional circumstances, where the applicant does not have or cannot find a donor site, a payment-in-lieu of housing is required. Policy H2 requires the submission of a Financial Viability Assessment (FVA) where a scheme is not providing the full amount of housing or financial contribution in line with this policy.
- 9.15 Under the proposals there would be an uplift of 8,314 sq. m (GIA).

On site housing

9.16 The applicant has included a Residential Studies section in the Design and Access Statement, which assessed the possibility and constraints of providing housing on-site. This study assesses different scenarios which have been reviewed and fully considered by officers, including housing on the Gray's Inn Road side of the building, Brooke Street side of the building, the roof of the building and within the courtyard area adjacent to Brookes Close to the north. Officers accept that there are constraints to providing adequate residential accommodation on site.

- The proposal is a remodelling / refurbishment of the existing building which restricts development possibilities.
- Most flats would need to be single aspect given the layout of the existing building and the depth of the floorplate, the existing floorplates were designed for office use and it would be difficult to create flats with an acceptable level of amenity.
- Much of the building edge faces north so the only parts of the site that could be suitable for residential are on the western, southern and eastern sides to avoid north facing single aspect units.
- Residential use in the same building would require a separate core which would result in a significant loss of floorspace on the site, a poor ratio of usable floorspace to core and a subsequent reduction in the overall viability of the scheme.

9.17 Officers accept that the amenity of flats provided in the development would not be good in terms of aspect, daylight and sunlight and that the provision of residential on site would not be the best use of floorspace. It is considered that the applicant has provided clear evidence that it would be more appropriate to not provide the residential floorspace on-site in this instance, in line with Policy H2.

Off-site housing

9.18 The second part of the cascade in Policy H2 requires the provision of off-site housing. The policy requires that an applicant carry out a search for a potential donor site with the option of a payment-in-lieu as an alternative only being considered acceptable in 'exceptional circumstances'.

9.19 A fully policy-complaint off-site proposal in this case would provide 4,157 sq. m of residential floorspace (being 50% of the uplift of 8,314 sq. m). Policy H4 which seeks the provision of affordable housing in residential schemes would also apply and given the quantum of housing it would be expected that 2,078.5 sq. m (i.e. 50%) of this would need to be affordable housing. The 50% target applies to developments where there is capacity for 25 or more dwellings under the sliding scale.

9.20 The supporting text to policy H2 (para. 3.56) sets out that alternative sites must be in the borough, and will initially be sought in the same ward as the development; however, it is also recognised that there is intense competition

for development sites in Camden which creates a risk that no site will become available for delivery of the housing if it cannot be identified by the time the application is determined (para. 3.54). In this case, there are no such sites for housing on the scale required available, the owner does not own land in the vicinity of the site which could deliver off-site housing and therefore, it is accepted that it is not practical for the required housing to be provided off-site.

Financial contribution

9.21 In terms of the financial contribution towards the provision of off-site affordable housing (PIL), the proposed uplift of 8,314 sq. m (GIA) would require a payment of £6,235,500 to be policy compliant (8,314 sq. m / 2 = 4,157 sq. m x £1,500 = £6,235,500). The applicant has advised that the scheme cannot meet this requirement for viability reasons and has submitted a viability report to support that assertion. Whilst their report concludes that no payment would be viable, the applicant has agreed to make an upfront payment of £3,000,000 which is close to 50% of the policy requirement in lieu of a deferred affordable housing clause. This gives them more certainty on development costs from the outset.

Viability and affordable housing

9.22 A Financial Viability Assessment (FVA) was prepared by DS2 on behalf of the applicant and submitted in December 2023. The FVA was independently reviewed for the Council by BPS Chartered Surveyors in December 2024. Both appraisals agreed that the scheme generated a deficit, with DS2 identifying a deficit of approximately £14.4m for the commercial-led scheme. On this basis, the initial submission concluded that the scheme was unable to viably contribute towards affordable housing.

9.23 Following discussions between the applicant and the Council, and a period of negotiation, revised drawings and an updated FVA were submitted in August 2025. The updated appraisal indicated that the scheme remained in deficit, increasing to -£35.5m. BPS undertook a further independent review and, following detailed interrogation of inputs, concluded that the scheme remained unviable but with a smaller deficit of -£19.4m.

9.24 BPS agreed with the overall approach adopted, including the Existing Use Value (EUV) method to determine the Benchmark Land Value, which they considered to be broadly reasonable. However, BPS identified several adjustments to DS2’s assumptions, notably a modest increase in open market rental values, a reduction in letting agent fees from 12% to 10%, and the exclusion of an unsubstantiated allowance for neighbourly matters. They also applied a higher profit margin to the affordable workspace element. These are shown in the table below.

Input	DS2	BPS
Income		
OMS commercial	£170,487,599	£187,173,775
Affordable workspace	£7,054,105	£7,582,131
Expenditure		

Commercial letting	£2.50 psf	
Letting agent fee	12%	10%
Profit commercial	15%	15% (private office) 6% (affordable)
Development Timeframes		
Construction period	30 months	19 months
Viability position	-£35.5m	-£19.4m

Table 3: Comparison of DS2 and BPS viability inputs

9.25 Following these amendments, BPS concluded that the scheme would remain in deficit by approximately £19.4 million, compared to the applicant's estimate of £35.5 million. Both assessments therefore indicate that the development cannot viably deliver a policy-compliant affordable housing contribution. BPS recommended that, should permission be granted, pre-implementation and late-stage review mechanisms be secured to allow viability to be reassessed if market conditions improve.

9.26 As stated above, the financial contribution requirement in line with policy is £6,235,500. The applicant's offer subsequently negotiated by officers for just under 50% of the policy compliant PIL is on the basis that there will not be a review clause for a deferred affordable housing contribution in the event of improved viability as is generally sought. Developers often raise concerns about the uncertainty such clauses create for securing development finance, given the potential for unspecified future payments. In this case, given the substantial viability deficit identified by both the applicant's and the Council's independent assessments, officers consider that accepting a PIL of just under 50% of the policy requirement, without a review clause, represents a reasonable outcome that concurs with the evidence and ensures that a meaningful contribution towards the delivery of affordable housing is secured in line with London Plan Policy H4 and Camden Local Plan Policy H4.

9.27 BPS's viability assessments are attached as appendix A.

Class E retail use

9.28 The entire site is within the Central Activities Zone. The site is also located within the High Holborn / Kingsway Central London Frontage. Policy TC2 seeks to protect and enhance the role and unique character of each of Camden's centres. It also states that the Council will ensure the development of shopping, services, food and drink and entertainment does not cause harm to the character, function, vitality and viability of a centre.

9.29 The existing building includes an ancillary café space on the ground floor which is part of the main office use and falls within Class E. The proposal would create 57 sq. m of café space which would be accessed from Gray's Inn Road and would be capable of being used independently. This retail function would be supported within the designated Central London frontage and is therefore in accordance with policy TC2.

- Conclusion: land use**
- 9.30 Under the proposals there would be a significant increase in office floorspace that would be suited to flexible, modern needs. The proposals would result in a substantial increase in employment opportunities on the site to the benefit of the local economy. The provision of a proportion of affordable workspace will support SME's.
- 9.31 Officers accept that it is not viable to provide residential on site, on a donor site, nor a policy compliant PIL, but welcome the applicants willingness to continue to make a PIL of just under 50% subject to a deferred affordable housing clause not being imposed. It is considered that the PIL has been reasonably maximized and will be of significant benefit to the delivery of affordable housing projects in the Borough.
- 9.32 The proposal would feature active frontages and a Class E café use which would support the function of the CAZ and the Central London frontage.
- 9.33 Given the above, the proposed land use is considered acceptable as it would provide significant employment and economic benefits, as well as contributing towards affordable housing delivery and the vitality of the area.

10. DESIGN AND HERITAGE

Legislative background

The Planning (Listed Buildings and Conservation Area) Act 1990

- 10.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.2 The effect of this section of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of Listed Buildings and their settings. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 16).
- 10.3 The duties imposed by the Listed Buildings Act are in addition to the duty imposed by section 38(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.

The National Planning Policy Framework (NPPF)

- 10.4 The NPPF requires its own exercise to be undertaken as set out in chapter

16 (Conserving and enhancing the historic environment). Paragraphs 207-216 require consideration as to the impact of a proposed development on the significance of both designated heritage assets and non-designated heritage assets, including an assessment and identification of any harm/the degree of harm. Paragraph 215 states:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

Policy review

- 10.5 London Plan policy D4, policy D1 of the Local Plan and CPG (Design) seek to secure high quality design. Policy D1 seeks high quality design in all development by requiring development to respond to local character and context, be highly sustainable in design and construction, integrate well with the surrounding streets and townscape, comprise high quality architecture, and be accessible for all. Policy D2 is also relevant given the application site's proximity to the Hatton Garden and Bloomsbury Conservation Areas. It requires development to preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Design assessment

Ground floor, uses and public realm

- 10.6 The proposed development is primarily office with a mix of commercial uses at ground level in order to make the ground floor engaging and characterful. The new arrangement will provide more active frontage to the perimeter of the site, with some public access to a café use at ground floor. A new level access office entrance on Gray's Inn Road would provide greater accessibility than the arrangement in the existing building which aligns with key design policies. A new cycle entrance would be created to the Brooke Street elevation providing more activation to the currently blank frontage.
- 10.7 At ground floor on Gray's Inn Road currently a ramp and stair extends into the pavement reducing the width from the main building line from 5.3m at the southern end where it adjoins with no. 150 Holborn, to 3.5m at the northern end to align with its neighbour at no. 24-28 Gray's Inn Road. Initial proposals extended the façade line of the building out to match that of no. 24-28 Gray's Inn Road, with columns coming down into the footway, reducing the clear width all the way along to 3.5m. Following further discussions, the façade line has been set back to align with ground floor of the side elevation of no. 150 Holborn that fronts Gray's Inn Road and introduces planting and street furniture either side of the entrances, leaving a clear pavement width of 4.8m – 5.05m, which would provide a more positive contribution to the public realm. This results in an increase of 38 sq. m of seating and public amenity, which is welcome on this busy street.

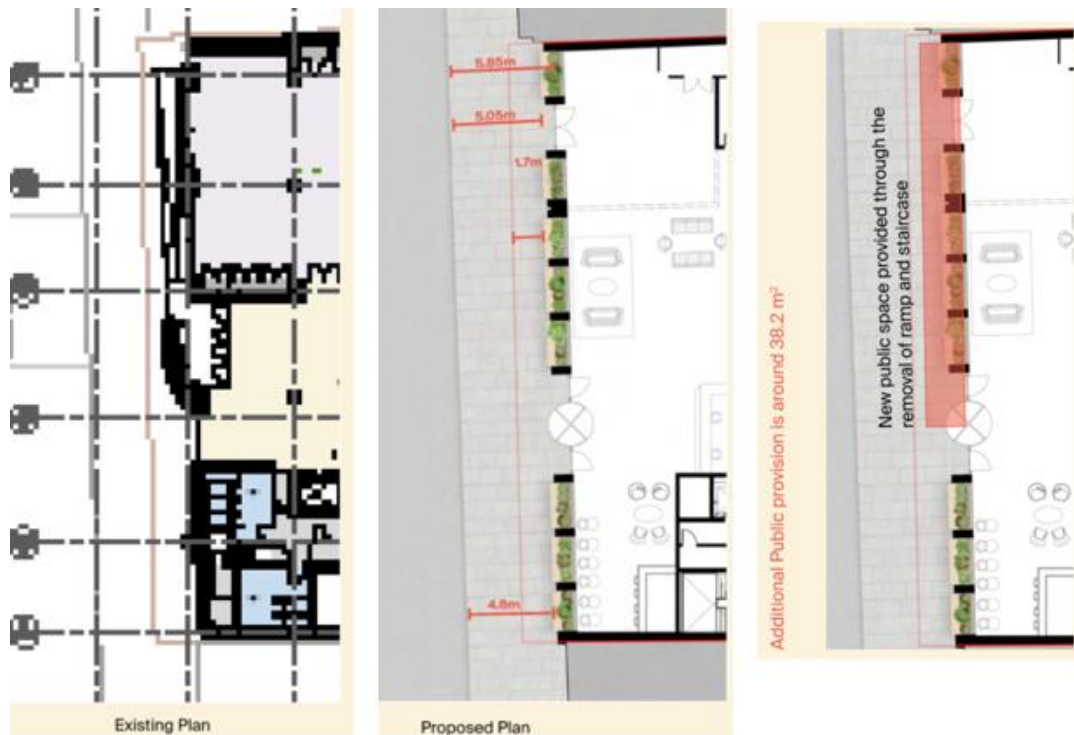


Figure 9: (Left) Existing building line: (Middle) Proposed building line: (Right) Additional public realm following removal of external stair and ramp

10.8 The main servicing provision is on Brooke Street, which is the same as the current arrangement, and is confined to a single vehicular access ramp to the basement to ensure the ground floor façade is not dominated by service bays. Its location on Brooke Street ensures vehicular servicing movements are kept away from the public realm at Beauchamp Square and Brooke's Market.

10.9 Overall, the scheme achieves an improved degree of active frontage when compared with the existing site condition, which aligns with key design policies and would contribute positively to the street.

Scale and massing

10.10 The existing U-shaped building comprises two 5 storey wings, facing onto Gray's Inn Road and Brooke Street, with a connecting 8-9 storey element spanning the two facades, creating a large central courtyard space to the north, and smaller courtyard to the south.

10.11 The scheme proposes a series of extensions:

- A tiered extension into the northern courtyard;
- A full height extension into the southern courtyard;
- Extensions at upper levels on Gray's Inn Road and Brooke Street; and
- Additional storey on the 8th floor and new plant enclosure.

10.12 Where additional floorspace is added, the proposals do not increase the overall height of the building. The existing building breaches the LVMF view (4A.1) and the building is not proposed to extend any further into the protected view (refer to heritage assessment section for further details).

- 10.13 The main body of the extension is within the northern courtyard and impacts therefore on the properties have been mitigated through a series of measures to break down the bulk of the building. The massing here steps down significantly to the north to create a tiered effect in order to lessen the impact on the amenity of the properties and public realm of Brookes Court to the north. Further softening through planted green terraces will help to create an improved outlook.
- 10.14 Where the additional massing of the building at upper levels is appreciable from the surrounding streets, some amendments have been made to help the building sit more comfortably in its street contexts.
- 10.15 The massing on Gray's Inn Road is designed to read as two distinct volumes echoing the narrower plot widths found on surrounding streets. The northern volume is 6 storeys, respecting and relating to the neighbouring building at no. 24-28 Gray's Inn Road, stepping up to create a larger 9 storey volume that relates to the southern neighbour of no. 150 Holborn, which is part of a context of much larger scale buildings.
- 10.16 As initially submitted, the Gray's Inn Road façade projected beyond that of its neighbour at no. 150 Holborn. This has subsequently been pulled back to align with the adjoining façade at no. 24-28 Gray's Inn Road (refer to figure 10 below). This ensures the façade sits more comfortably in the street. The revised proposals have also removed the overhang from first floor and above, which improves the relationship with its neighbours and the prevailing building line. This offers a distinct improvement to the street level experience and is welcome.



Figure 10: (Left) Original Gray's Inn Façade; (Right) Amended Grays Inn Façade

- 10.17 To the east, on Brooke Street, the relationship between the existing residential four storey buildings abutting the flank wall and the proposals are similar to the existing condition, with the height of this element remaining comparable. The increase in massing is stepped back, creating a terrace, and retaining clear sky and not looming over the existing housing.



Figure 11: (Left) Existing Dorrington Street view: (Right) Proposed Dorrington Street view

- 10.18 Following further discussion with officers, the plant enclosure at roof level has been pushed back from the building edge by 1m to lessen the sense of enclosure on Brooke Street and reduce its perceived visual massing (see figure 12 below). The adjustment to the roof plant helps it become less visible in views from Waterhouse Square, reducing the visual impact at roof level. Details of the plant enclosures would be secured by condition (condition 30).



Figure 12 (Left) Original view from Brooke Street (Right) Amended view from Brooke Street

Facades and materiality

- 10.19 The proposed new facades comprise brickwork, reconstituted stone, terrazzo and aluminum windows, and respond to each of their distinct street characters.
- 10.20 The Gray's Inn Road elevation has evolved to present a simple gridded façade using terrazzo and a red reconstituted stone fading to a lighter pink tone as primary facing materials (refer to figure 13 below). This picks up on the red terracotta and pink granites found amongst many other buildings elsewhere in the surrounding area. Solidity has been added with the introduction of detailed upstands, which adds depth to the elevation and results in a refined composition. Samples of brick work would be secured by condition (condition 30).



Figure 13: (Left) Original large windows on Grays Inn Road façade: (Right) Revised gridded façade on Gray's Inn Road

- 10.21 The southern façade design is intentionally simple and rhythmical, reflecting its limited visibility and secondary aspect. Standardised window openings would be set within a pre-cast concrete panel structure, with the façade composition incorporating stock white brick, stone string courses, metal-framed window systems and retractable awnings to reduce solar gain.
- 10.22 The northern and eastern elevations would be constructed in red brick to complement the surrounding townscape and to maintain coherence in the material treatment of the building. The southern side elevation, by contrast, is of limited visibility in the wider streetscape and would primarily be seen in oblique or short-range views from the adjacent residential properties to the south. The intention to construct this elevation using white brick is primarily a functional measure to maximise light reflectance and improve daylight to the neighbouring flats at no. 33 Brooke Street. While this would result in a visual distinction from the brick façades, the elevation is not a prominent part of the building's overall composition and would not materially affect its architectural composition or the character of the surrounding area.
- 10.23 On this basis, the proposed treatment is considered acceptable in design terms. A condition is recommended requiring submission of all external materials and finishes as well as the white brick to ensure the quality and tone of finish are appropriate and do not appear visually stark or incongruous (condition 30).
- 10.24 The proposed Brooke Street facade is designed to be straightforward to respond to the secondary nature of the street. Standard window systems would be utilised in a pre-cast concrete panel wall construction to regularise

manufacture process and reduce disruption to neighbouring buildings. As with the southern façade, stock bricks, stone string courses, metal window systems and retractable awnings are proposed. The selection of brick is consistent with the surrounding brick buildings of Brooke's Market and the wider conservation area, whilst also being complimentary to the historic terracotta facades of the Waterhouse Estate. The details of the brick, windows and retractable awnings would be secured by condition (condition 30).

- 10.25 The material palette and details outlined within the submission documents are of a high quality and are considered to respond appropriately to the character of the area in line with policies D1 and D2 (Camden Local Plan, 2017). Given that the brick, reconstituted stone and terracotta would be the primary facing materials, careful consideration should be given to its tone and quality to ensure the successful relationship with the surrounding buildings. Materials and detailing would therefore be conditioned to ensure a building of the highest quality with durable finishes that weathers well (condition 30).

Design Review Panel

- 10.26 On 24 February 2023, the emerging proposals were presented to the Design Review Panel (DRP). The proposals have since evolved and addressed some of the concerns raised by the panel.
- 10.27 The panel were concerned that the additional height proposed for the northern section of the site on Gray's Inn Road would have a detrimental effect in views from Gray's Inn Square. The current building steps down in height to the north, in response to a lower datum line that continues either side of Gray's Inn Road. As a result the proposals have been revised to include a stepped massing, to lessen the impact on Gray's Inn Square.
- 10.28 The panel took the view that the material palette as proposed for the Gray's Inn Road façade was too dark, and the warmer brick palette proposed to the north (terraced) elevation could be better suited to the character of the street. Materials proposed for Gray's Inn Road have since been amended to achieve a more consistent approach, with a more contextual colour palette, as suggested.
- 10.29 Concerns about the additional massing to the north within the courtyard and the impact on residents of Brookes Court were raised. The panel suggested that a robust landscape strategy would be necessary to protect residents' amenity, which has been observed and submitted. The terraces have been reduced in size, further set back in places and have been made narrower at lower levels to bring more light into the courtyard.
- 10.30 It was considered that the changes made sufficiently addressed the comments made by the panel, resulting in an improved proposal, and therefore needed no further review.

Heritage assessment

Designations

Conservation and heritage assets

- 10.31 The site does not have any heritage designations, but it is in close proximity to two conservation areas, Bloomsbury Conservation Area to the west side of Gray's Inn Road and Hatton Garden Conservation Area to the east of Brooke Street. Waterhouse Square which lies to the east of the site is Grade II* listed and Church of St Alban and Matyr (Grade II*) and its associated Clergy and Railings (Grade II) to the north of the site are all listed. Within Gray's Inn complex to the west are a number of listed buildings including the Hall (Grade I), The Chapel (Grade II) and Statute of Francis Bacon (Grade II) all set within the Grade II* Gray's Inn Registered Park and Garden.



Figure 14: Designated heritage assets surrounding the site

Significance of Hatton Garden Conservation Area

- 10.32 The wider Hatton Garden conservation area has a varied townscape character. Chimneys, towers and other vertical elements rise from the blocks and become reference points within the streetscape. Punch windows largely follow a regular grid and a sense of symmetry within individual plot widths which result in a streetscape with windows repeating in multiple patterns in close proximity. In heritage terms the conservation area is varied, with no single period, style or use predominating. Yet, there is a conspicuously high proportion of Victorian former warehouses and twentieth-century commercial buildings, and a smattering of Georgian houses, all of which are the direct result of the history of the area.
- 10.33 There are a mix of uses, especially commercial and residential. The area forms a dense network of minor streets connected to four major streets. Part of the character comes also from the activities associated with the area, especially those connected to the jewellery trade, concentrated along Hatton Garden and its side streets.

Impact on setting of surrounding conservation areas

- Hatton Garden Conservation Area – (No harm)
- 10.34 There are a mix of uses, especially commercial and residential. The area forms a dense network of minor streets connected to four major streets. Part of the character comes also from the activities associated with the area, especially those connected to the jewellery trade, concentrated along Hatton Garden and its side streets.
- 10.35 The proposed development will have an impact on the south west corner of Brookes Market which is a small public open space, bounded by a variety of building heights and styles. The southern side of the open space is already bounded by the modern part of the former Prudential Assurance Building now Waterhouse Square, which is taller than its neighbours. Although additional height will be added to this part of Fox Court, due to the set back it would not be seen as a direct part of the Brooke's Market, and will be seen in the context of already larger buildings. There would be no harm to the setting of the Hatton Garden Conservation Area.

Bloomsbury Conservation Area (including setting of The Hall, Chapel and 12,13,14 Gray's Inn Square and the setting of Gray's Inn Park and Garden - (less than substantial harm)

- 10.36 Bloomsbury Conservation Area lies to the west of the site (on the other side of Gray's Inn Road). It is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area.
- 10.37 Overall, the area's hierarchy of main arterial routes, grids of streets, rear mews spaces and narrow lanes creates a noticeable transition in the sense of enclosure moving around the Conservation Area. This dynamic spatial character emphasises the difference in the scale of the component streets and spaces, making each component element and the difference between them notable.
- 10.38 However the application site lies immediately to the east of sub-area 9 (Lincoln's Inn Fields/Inns of Court/High Holborn). This sub area takes in both Gray's Inn and Lincoln's Inn Inns of Court and consequently has a distinct character. This character is derived from the marked contrast and transition in scale and sense of enclosure experienced when moving through the interconnected spaces comprising landscaped squares, enclosed courtyards, and narrow passageways and lanes, many of which are vehicle-free with a high volume of pedestrian activity. For over five hundred years the area has been a major centre for the legal profession and for the training of barristers. The current and historic activities associated with the site contribute to the sense of place. Much of the sub area has a secluded and peaceful ambience, with a collegiate feel derived from the courtyard elements.

- 10.39 Gray's Inn Gardens, South Square and Gray's Inn Square are a series of gardens and squares surrounded by barrister's chambers and other offices within Gray's Inn. The significance of these spaces is similar to that of the conservation area, that is a series of enclosed and interconnected green spaces which have a secluded and peaceful ambience. As these buildings are only seen in the foreground of the proposed development, their special interest comes from their townscape value as part of Gray's Inn Square as a planned piece of townscape specifically for legal profession.
- 10.40 The top of Fox Court is visible from both Gray's Inn Square and South Square (see figure 15 below). In the view from South Square it is only the top two floors and plant level which are visible above the roofline. Due to its muted grey appearance and simple form, it appears recessive and this softens its impact.
- 10.41 However the proposed buildings, in this view, would be wider with a much more animated and busy façade which draws significantly more attention to it compared with the existing. The proposed colour, which matches the buildings in South Square actually draws more attention to the building by tying the two different pieces of architecture closer together. This has a harmful impact on the secluded and collegiate character of this area.



Figure 15 (Left) Existing view from South Square (Right) Proposed view from South Square

- 10.42 Gray's Inn Square is much larger, and further away from Fox Court and includes views of the development in relation to The Hall, Chapel 12,13 and Gray's Inn Square, although this view is partly screened by trees. As a result of this there are more views of wider London from this square, and therefore the increased bulk and appearance of the building does not significantly alter the relationship of Fox Court to this space and listed buildings. There is therefore no harm to the setting of Gray's Inn Square.



Figure 16 (Left) Existing view from Grays Inn Square (Right) Proposed view from Gray's Inn Square

- 10.43 Overall there would be some impacts on certain views within the conservation area, the proposal would cause less than substantial harm to the setting of the Bloomsbury Conservation Area when viewed from South Square. Given the heritage asset is assessed as a whole, the level of harm is at the lowest end of less than substantial harm.

Impact on surrounding listed buildings

- 10.44 St Alban's Church (Grade II*) - (No harm)
 The church was built in 1861-62 to the designs of William Butterfield with a chapel added in 1891 by CHM Mileham. It was bombed in 1941 and restored 1959-61 by Adrian Gilbert Scott. St Alban's was one of Butterfield's finest works, although only the west tower and clergy survive. The church tower is a striking local landmark and of interest for its architectural and townscape value.
- 10.45 In views from both Baldwin Gardens and Brooke's Market, Fox Court can be viewed in conjunction with this church. However, in both cases there would still be a significant visual gap between the two buildings, which leaves the western tower clearly silhouetted and a prominent landmark. There would be no harm to the setting of this listed church.
- 10.46 142 Prudential Assurance Building (Grade II* - no harm)
 Waterhouse Square (formerly The Prudential Building) dates from 1885-1901 and was designed by Alfred Waterhouse with additions from 1930-32 by EM Joseph. The latter were largely replaced by rebuilding works from the late twentieth century. The building is of architectural interest for being a Victorian Gothic showpiece. Its southern elevation fronting Holborn is of particular note for its landmark qualities and rich detailing. In contrast the northern end is a modern structure of limited interest.
- 10.47 The proposed development and this building would be visible in views along Brooke Street. However, Fox Court would only be visible against the twentieth century parts of the Prudential Assurance Building, which contributes little to the special interest of the building. The proposed bulk and materials are similar to what can be seen on Waterhouse Square and therefore the setting of the building is preserved. There would be no harm to the setting of the Grade II* listed building.

London View Management Framework (LVMF)

LVMF 4A.1 Primrose Hill to St Paul's

10.48 The site is visible in the foreground of St Paul's Cathedral with the Viewing Corridor. The LVMF advises that an important characteristic of the view is the viewer's ability to recognise and appreciate the peristyle, drum, dome and western towers of St Paul's Cathedral.

10.49 The proposed development does not raise the height of the building, which sits below the peristyle of St Paul's in densely developed foreground. The ability to recognise and appreciate will remain unchanged and therefore this view is preserved.

LVMF 5A.2 Greenwich to St Paul's

10.50 In this view the site is in the background of the protected view. The dome (above the peristyle) and the upper parts of the western towers of St Paul's Cathedral are well defined against their background in this view.

10.51 Due to other taller buildings between Fox Court and St Paul's Cathedral, the proposed development will not be visible and leaves this view unaltered.

LVMF 6A.1 Blackheath Point to St Paul's

10.52 In this view the site is in the background of the protected view. The dome and western towers of the Cathedral are visible, the former silhouetted against the sky, enabling clear recognition and appreciation of the landmark.

10.53 Due to other taller buildings between Fox Court and St Paul's Cathedral, the proposed development will not be visible and leaves this view unaltered.

Archaeological impacts

10.54 The site is located within an area of archaeological interest (Archaeological Priority Area). The proposal retains the existing basements and the applicant has confirmed that no new foundation piles are needed. An Archaeological Desk-Based Assessment has been prepared by Hawk Heritage to assess any potential impact of new services on below ground heritage assets and any required mitigation measures.

10.55 The proposed development site lay at the outer edge of the City of London until the 18th century. Roman remains including burials have been recorded along Holborn, which originated as a Roman road out of Londinium. Roman pits have recently been recorded on the neighbouring 150 Holborn site at a depth (15.6-16m OD) which would allow for survival of similar remains under the basement slab, although trial excavation in the 1970's only found a 17th century cellar. The Gray's Inn street frontage appears to have been built up by the 16th century, although the frontage itself now lies beneath the modern street the previous fieldwork indicates that burial remains related to this period do survive albeit truncated by modern development.

10.56 Historic England's Greater London Archaeological Advisory Service

(GLAAS) were consulted and confirmed that the site has low-moderate archaeological potential. They advised that due to the groundworks being sufficiently small in scale it is likely that there would be little or no harm to the archaeological significance and no further archaeological works are therefore required and no conditions are necessary.

Design and heritage conclusion

- 10.57 The proposal significantly improves the experience of the building from Gray's Inn Road and enhances the public realm around the site. The design creates an open, publicly accessible, mixed use ground floor plane with active ground floor frontages.
- 10.58 The proposed development would further contribute to the strengthening of Gray's Inn Road and Waterhouse Square through animation of the ground floor and strengthening the relationship with the street. This includes a response through the building line better relating to its neighbours than the existing condition.
- 10.59 In terms of detailed design and materiality, the architectural treatment of the Gray's Inn Road elevation has also been developed to achieve a stronger contextual response. The original dark-framed industrial-style façade has been replaced with a lighter terracotta grid system which introduces warmth and material richness more in keeping with the brick tones characteristic of the area. The clear vertical rhythm of the grid, combined with generous window openings and recessed balconies, creates depth and visual interest while maintaining a contemporary warehouse-inspired aesthetic. At ground floor, a highly glazed frontage provides an active edge to the street and enhances permeability and natural surveillance. These detailed design changes, secured through officer negotiation, ensure that the building sits more comfortably within its setting, responding positively to the rhythm and proportions of the adjoining terraces while still delivering a high-quality, modern intervention on Gray's Inn Road.
- 10.60 In accordance with paragraph 215 of the NPPF, the identified harm to the Bloomsbury Conservation Area, which is assessed as being at the lowest end of the less-than-substantial scale, must be weighed against the public benefits of the proposal. The scheme would deliver the sensitive refurbishment and extension of an existing office building, providing high-quality, flexible workspace that supports the continued economic role of Holborn and the wider Central London area. The proposal also offers design improvements that enhance the architectural quality of Fox Court, contributes to townscape uplift, and delivers sustainability benefits through the retention and re-use of significant parts of the existing structure. These combined public benefits are considered to carry significant weight and are to be weighed against the identified less than substantial harm in line with the relevant provisions of the NPPF. This balancing exercise will be revisited in the light of the full public benefits of the scheme including those relating to land use and other yet to be assessed factors when coming to the concluding section of this report.

- 10.61 An architect-retention clause would be included as a Section 106 Head of Term if planning permission is granted, to ensure continuing design quality through to the build stage.

11. IMPACT ON NEIGHBOURING AMENITY

- 11.1 Local Plan Policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and future occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

- 11.2 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.”

Introduction

- 11.3 The application building is located to the north of residential properties fronting Brooke Street, to the south and east of residential properties fronting Gray's Inn Road and to the south of properties within Brookes Court, Baldwin's Gardens.

Daylight, sunlight and overshadowing

- 11.4 A Daylight, Sunlight and Overshadowing Report has been submitted as part of the application which details any impacts upon neighbouring properties. At the request of officers, the applicant has also submitted transient overshadowing diagrams to determine the hourly impact on Brookes Square Market, and a cumulative Overshadowing Study which considers the cumulative effects of the proposed developments including Waterhouse Square (the “cumulative impact”).

- 11.5 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.

Methodology

- 11.6 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)

- 11.7 The Vertical Sky Component test assesses the amount of daylight hitting a window by measuring the amount of sky visible at the centre of a window. The BRE considers daylight may be adversely affected if, after development, the VSC score is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.

No Sky Line (NSL)

- 11.8 No Sky Line, also known as Daylight Distribution (DD) is a test of 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)

- 11.9 This is a measurement of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive. It measures the number of hours that direct sunlight reaches unobstructed ground across the whole year and also over the winter period. The main focus is on living rooms.
- 11.10 The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. If below this, impacts are noticeable if they are reduced to less than 0.8 times their former value and if the reduction in sunlight received over the whole year is greater than 4% of annual probable sunlight hours. It recommends testing living rooms and conservatories.

Sun-hours on Ground (SoG)

- 11.11 This is also known as overshadowing and is a measurement of the amount of direct sunlight received by open spaces.
- 11.12 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). Impacts of development will be noticeable if the area which can receive some sun on 21 March is reduced to less than 0.8 times its former value.

Categorising impacts and considering context

- 11.13 BRE guidance also recommends using significance criteria which allows a clearer understanding of where the more significant impacts are, as set out in the table below.

BRE compliant =< 20%	20.1% to 30% reduction	30.1% to 40% reduction	More than 40.1% reduction
Negligible	Minor adverse	Moderate adverse	Major adverse

Table 4 – Categorisation of magnitudes of effect

- 11.14 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 central London or Growth Areas. As a result, it recommends a flexible approach or setting alternative targets which take

account of relevant local context.

- 11.15 In these relatively dense urban locations, a retained VSC value of 15-20% VSC can often be considered an acceptable level of retained daylight. The area is in Central London, in a dense urban environment with some narrow streets – as such a retained target of around 15%-20% VSC and >50% room area for NSL is often considered reasonable in these contexts. The targets are also consistent with those that have been applied to other schemes in Camden.
- 11.16 Officers acknowledge that the development is proposed in a dense urban environment and the design and nature of some of the existing neighbouring buildings is such that there are some pre-existing shortfalls in daylighting relative to the normal BRE Standards. When this is the case any small absolute reduction can result in non-compliance. Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative negative impact on the VSC, and on the area receiving direct skylight. Where there are balconies which can cause obstruction, the BRE guidelines suggest modelling the impacts with and without the balconies. This allows you to test whether the presence of the balcony or overhanging walkway, rather than the size of the new obstruction (the proposed development), is the main factor in the relative loss of light. Given the nature of the site and surrounding buildings, it would be difficult to extend the current building without resulting in some transgressions in BRE guidance.

Assessment

- 11.17 The reports considered the impact on nearby residential blocks which are listed and labelled on the plan below.
1. Residential building to the rear of 147-150 Holborn – known as 33 Brooke Street (no. 1)
 2. 4-9 High Holborn (no. 2)
 3. 24-28 Gray's Inn Road (no. 3)
 4. 30-32 Gray's Inn Road (no. 4)
 5. 38 Gray's Inn Road (no. 5)
 6. Brookes Court Estate (no. 6)
 7. 16 Brooke Street (no. 7) (St Mungos)



Figure 17. The site (yellow) with the surrounding tested properties (green)

11.18 Of the seven properties tested, the analysis shows that 4 will remain fully compliant with the BRE targets when considering this scheme (4-9 High Holborn (no. 2), 30-32 Gray's Inn Road (no. 4), 38 Gray's Inn Road (no. 5) and 16 Brooke Street (St Mungo's) (no. 7)). The submitted daylight and sunlight assessment notes that some of the internal layouts of neighbouring properties were not available. Accordingly, the analysis has been based on assumed room layouts and standard room depths of 4 metres, informed by the external building form and window positions. This approach is consistent with the methodology set out in the BRE guidelines and is considered reasonable in the absence of detailed floorplans. The buildings that would experience more adverse impacts are identified in figure 16 above as no. 147-150 Holborn (now 33 Brooke Street (no. 1)), 24-28 Gray's Inn Road (no. 3) and Brookes Court Estate (no.6). These are discussed in more detail below:

Residential block to the rear of 147-150 Holborn – known as 33 Brooke Street

11.19 The 1st to 6th floors of the building comprise 13 flats. The assessments show that 24 of the 49 windows (49%) tested will retain BRE Report VSC compliance and that 5 of the 7 rooms will retain NSL compliance. Review of the VSC results for the remaining 25 windows shows that, where transgressions occur, 4 are minor (between 20% and 29.9%) reductions, 1 is a moderate loss (between 30% and 39.9% reduction) and 4 are major (above 40% reduction).

11.20 The building incorporates projecting balconies along the eastern (front) elevation and inset, angled balconies to the northern elevation, which faces towards the application site. There is a winter garden at first-floor level, and

the upper storeys include overhanging elements on the northern façade that provide partial shading to the full height glazed windows below (see Figure 18).



Figure 18: Residential block to rear of 150 Holborn (known as 33 Brooke Street)

11.21 Whilst there are a significant number of transgressions the data shows that 11 are minor (between 20% and 29.9%) reductions, 10 are moderate losses (between 30% and 39.9% reduction) and 4 are major (above 40% reduction). These transgressions relate to windows that serve bedrooms and open plan living / kitchen / dining (L/K/D) rooms. The following table identifies the transgressions.

Room served	Existing VSC	Proposed VSC	% loss	Absolute loss	Retained VSC (%) (proportion of existing light that remains)
Moderate					
Bedroom	4.63	3.10	33.05	1.53	67
Bedroom	3.98	2.65	33.42	1.33	66.6
Bedroom	11.25	7.86	30.13	3.39	69.8
L/K/D	9.80	6.08	38.27	3.72	62
Bedroom	6.05	4.21	30.41	1.84	69.6
Bedroom	5.09	3.52	30.84	1.57	69.2
Bedroom	14.04	9.76	30.48	4.28	69.5
L/K/D	12.31	7.60	38.26	4.71	61.7
L/K/D	15.27	9.61	37.07	5.66	62.9
L/K/D	18.67	13.03	30.21	5.64	69.8
Major					
L/K/D	0.01	0.00	100.00	0.01	0
Bedroom	0.36	0.09	75.00	0.27	25
L/K/D	0.09	0.00	100.00	0.09	0
Bedroom	0.71	0.15	78	0.56	21

Table 5 VSC impact on no. 33 Brooke Street

- 11.22 For 4 of the windows experiencing moderate reductions, the existing VSC values range from 3.98% to 6.05% and the proposed VSC values range from 2.65% to 4.21% which equates to percentage losses ranging from 30–33%. The percentage losses are significant but the actual losses would be between 1.3% to 1.5%. These windows already receive very low levels of light at present and the actual loss of up to 1.5% would be unlikely to be noticeable to occupants. Furthermore these windows serve bedrooms where light levels are less important than living rooms or dining rooms.
- 11.23 For the remaining 6 windows experiencing moderate reductions, the existing VSC levels are higher ranging from 9% to 18%. These windows would experience reductions ranging from 6% to 13% with actual losses of between 1.8% and 5.6%. These windows serve mainly habitable rooms – open plan living / kitchen/ dining rooms where natural light is more important. Although the losses exceed 30%, the retained VSC levels (ranging from 6% to 13%) are typical of an urban context such as this and would continue to provide a reasonable level of daylight. While the reductions would be perceptible, they are not considered to result in unacceptable harm to the amenity of neighbouring occupiers.
- 11.24 The 4 windows serving L/K/D rooms and bedrooms that experience major reductions have very low existing VSC levels of 0.01%, 0.36%, 0.09% and 0.71%. The proposed VSC levels would be reduced to 0.00%, 0.09%, 0.00%, and 0.15%. These result in significant losses of 75–100%. The windows are set behind solid inset balconies which partially shade the full height glazed windows. Additional testing of the windows was carried out by the daylight and sunlight consultants with the balconies omitted. The windows did see improvements in daylight with the balconies omitted experiencing losses of between 32% to 52% (rather than 75-100% with balconies). The windows still see actual reductions in VSC % of 2.87%, 4.95%, 3.35%, 5.79%.

Room	Existing VCS% (with balcony omitted)	Proposed VCS % (with balcony omitted)	% loss
L/K/D	7.85	4.98	36.5
Bedroom	9.53	4.58	51.94
L/K/D	10.20	6.85	32.84
Bedroom	12.13	6.34	47.73

Table 6 Existing and proposed daylight levels with balconies omitted

- 11.25 As such, the reductions to these two living spaces are likely to significantly impact enjoyment of the properties, more noticeable in the rooms that currently see restricted daylight.
- 11.26 NSL analysis shows that in terms of actual daylight distribution inside the rooms, of all the rooms tested 3 NSL transgressions are minor being above

the 20% reduction target with losses of between 5 sq ft and 33 sq. ft of the rooms (between 20.1% and 25%). However, the transgression experienced to one of the living / dining/ kitchen rooms is major (above 40%) with a drop in NSL from 56.1% to 29.1%. The reduction in daylight to this living space is likely to significantly impact the enjoyment of this property.

- 11.27 In terms of sunlight (APSH), one of the bedroom windows would experience a reduction in winter sunlight hours from 6% to 4% and would also experience a loss in annual sunlight hours dropping from 46% to 44% (a reduction of 4.3%). The room would fall short of the BRE's 5% winter guideline but would exceed the BRE's 25% annual guidance. This indicates a moderate reduction in direct winter sunlight to the window, although given the minor annual loss and the room's use as a bedroom rather than a main living area, the impact is considered limited.
- 11.28 The existing southern elevation of the building that fronts onto no. 33 Brooke Street is constructed in red brick. The applicant has committed to the use of light-coloured white bricks on the southern façades of the extensions to the south to enhance reflected light to the neighbouring elevation of no. 33 Brooke Street. A technical analysis has been undertaken testing 3 scenarios (i) existing light levels with the current brick building (ii) light levels with the proposed scheme in place but with a plain brick façade and (iii) light levels with the proposed scheme in situ with a reflective (white) façade. A comparison of the light levels demonstrates that the daylight illuminance levels will remain broadly the same or slightly better when comparing the existing daylight illuminance levels (scenario 1) and proposed daylight illuminance levels (scenario 3). This would provide some qualitative improvement to internal luminance of the affected flats. In order to ensure that this is achieved a condition would be attached to secure the use of bricks with a reflective (white) finish and its retention in this form (condition 30).
- 11.29 It is acknowledged that the windows in the flats particularly in the lower floors of the block receive poorer levels of daylight due in part to the design of the building with inset balconies. The BRE guidelines allow for such features to be taken into account when determining the impact of a new building. However, the impacts to this block are likely to be significant to a number of the windows in the flats, and this will lead to noticeable reductions in daylight and sunlight within these properties. Whilst the significance is lessened by the current low values, the impacts of this development will have a notable impact on natural light enjoyment and there would be a conflict with policy A1.

24-28 Gray's Inn Road

- 11.30 The 1st to 5th floors of the building comprise 14 flats. The rear elevation of the property contains 20 east-facing bedroom windows across the 1st to 5th floors. Daylight testing shows that 18 of the windows will continue to meet the BRE Vertical Sky Component (VSC) guideline values with 8 of the windows experiencing improvements. In this instance the rear bedrooms are shallow in depth and already experience restricted daylight due to presence of the existing

external fire escape stair adjacent to the windows. The fire escape stair would be removed as a result of the proposal which would in practice improve localized daylight conditions (see figures 19 and 20 below)



Image 02: View from room R2/62 in the existing situation



Image 03: View from room R2/62 in the proposed situation

Figure 19 View from the bedroom on the first floor rear elevation of no. 24-28 Gray's Inn Road as existing (top) and as proposed (below)



Figure 20: Rear of 24-28 Gray's Inn Road

11.31 Two windows would experience reductions in excess of the 20% BRE threshold, with one classified as a minor impact (22.7% reduction) and one as a moderate impact (38.8% reduction). The moderate impact would be experienced by one of the bedrooms in the top floor flat (see table 7 and figure 21 below showing the reduction and the location of the affected window). Bedrooms are considered to have a lesser significance by the BRE guidance and the transgressions to the bedroom which has a moderate reduction in daylight is not considered to be detrimental to enjoyment of the property.

Table 7 VCS figures for affected windows at no. 24-28 Gray's Inn Road

Figure 21 Approved 5th floor plan of No. 24-28 Gray's Inn Road showing the window experiencing a moderate reduction in VSC daylight

- 11.32 With regard to No Sky Line (NSL), 11 of the bedrooms in the rear elevation of the building would remain compliant with BRE guidance and 9 would experience reductions. The 9 bedrooms facing the courtyard would experience notable reductions in daylight distribution. The NSL analysis shows losses ranging from 28.8% to 64.5% with the lower level rooms experiencing the most significant impacts. These lower rooms would see the proportion of the floor area receiving daylight reduce from around 90-95% to approximately 35-40%, indicating a material reduction in daylight penetration. The upper floor bedrooms experience more moderate reductions, retaining over 60% of their existing daylight. While the results demonstrate that several rooms would fall below the BRE's recommended 20% reduction threshold the greatest losses occur to rooms with already low baseline light levels (between 3%-5% existing VSC). Bedrooms are considered to have a lesser significance in the BRE guidance and whilst the bedroom transgressions are major in terms of impact, they are not considered to be particularly detrimental to enjoyment of the properties whose habitable living / dining areas are located to the front of the building facing Gray's Inn Road which remain unaffected by the proposal.
- 11.33 The absolute VSC values of the flats particularly in the lower floors remain low, reflecting the existing constrained nature of the site rather than an unacceptable new condition created by the proposal. On balance, while the NSL reductions are major to some of the bedrooms, the improvements in VSC and the secondary importance of bedrooms in daylight and sunlight terms mean that the overall effect is not considered to cause material harm to residential amenity.
- 11.34 There are no windows within 90 degrees of due south that are material for consideration in sunlight terms.
- 11.35 Overall it is considered that the retained daylight and sunlight are considered appropriate in the context.

Brookes Court, Baldwin's Gardens

- 11.36 Nos. 1 – 12 and nos. 13 – 32 Brookes Court, Baldwin's Gardens lie directly to the north of the site. The estate comprises a mixture of houses and flats. All 136 windows within this part of the estate will satisfy BRE VSC daylight guidance.
- 11.37 Of the 101 rooms tested, 100 satisfy the BRE no-sky line daylight guidance. The exception is one kitchen, which would experience a reduction in no-sky line area from 57 sq ft to 39 sq ft — a loss of 18 sq ft (31.2%), exceeding the BRE guideline threshold of 20%. This should be considered in the context of

the property's existing relationship with its surroundings, where a single-storey front extension located approximately 4 metres to the south already restricts daylight penetration to the affected ground-floor windows. The south-facing orientation ensures that the windows continue to receive some sunlight potential, and the APSH results confirm that while levels of direct sunlight remain modest, this primarily reflects existing site conditions rather than any new adverse impact arising from the proposal. The living rooms and bedrooms within the property are shown to either meet or exceed BRE guideline values. On this basis, the overall effect on daylight and sunlight to no. 31 is considered acceptable and would not result in material harm to residential amenity

- 11.38 APSH analysis shows 52 of the 55 rooms tested will retain BRE compliance. 3 rooms fail to meet BRE sunlight guidance and would be considered major transgressions (exceeding 40%). A bedroom in no. 31 Brookes Court would experience a loss of winter sun from 3% APSH to 1% APSH. Although the winter loss appears significant at 66% the absolute change is negligible, and a 2% reduction is below the level perceptible to occupants. The room would continue to exceed the BRE 25% annual sunlight guideline.
- 11.39 Two rooms in no. 32 Brookes Court would experience reductions in sunlight. One room of uncertain use would experience a reduction in annual APSH from 29% to 12% (a 43.8% loss), with no existing or proposed winter sunlight. This represents a technical transgression of BRE guidance, although the absolute level of direct sunlight is already modest and is likely to have limited influence on overall residential amenity. The other room is a bedroom which would experience a loss of winter sun from 1% APSH to 0% APSH. Although the winter loss appears significant at 100% the absolute change is negligible, and a 1% reduction is below the level perceptible to occupants. The room would continue to exceed the BRE 25% annual sunlight guideline.

Overshadowing – Brookes Court, Baldwin Gardens

- 11.40 An overshadowing study has been submitted as part of the daylight and sunlight statement to assess the impact of the development on the private gardens and communal amenity area in Brookes Court using SHoG (sun hours on ground) analysis. The BRE guideline states that at least 50% of an external amenity space should receive 2 or more sun hours per day on the 21st March. The applicant has modelled the situation for 21st March, 21st April, 21st May and 21st June which is the date on which the position of the sun in the sky at midday is at its highest.
- 11.41 Of the 11 private gardens tested 8 currently receive 0% sun on 21st March and the proposal does not change this. Of the remaining 3 gardens the sun on the ground levels currently range from 4% to 37% which illustrate they already experience significant overshadowing from surrounding buildings. The main concerns around overshadowing relate to the impact of the development on 2 of the individual private gardens of properties in Brookes Court, Baldwins Gardens and Baldwin Gardens communal amenity space

within Baldwins Gardens to the north of the site. Whilst impacts on the majority of the private gardens are negligible, those on nos. 30 and 31 Brookes Court and the community amenity area are more noticeable. The properties and communal amenity spaces are shown below in figure 22.

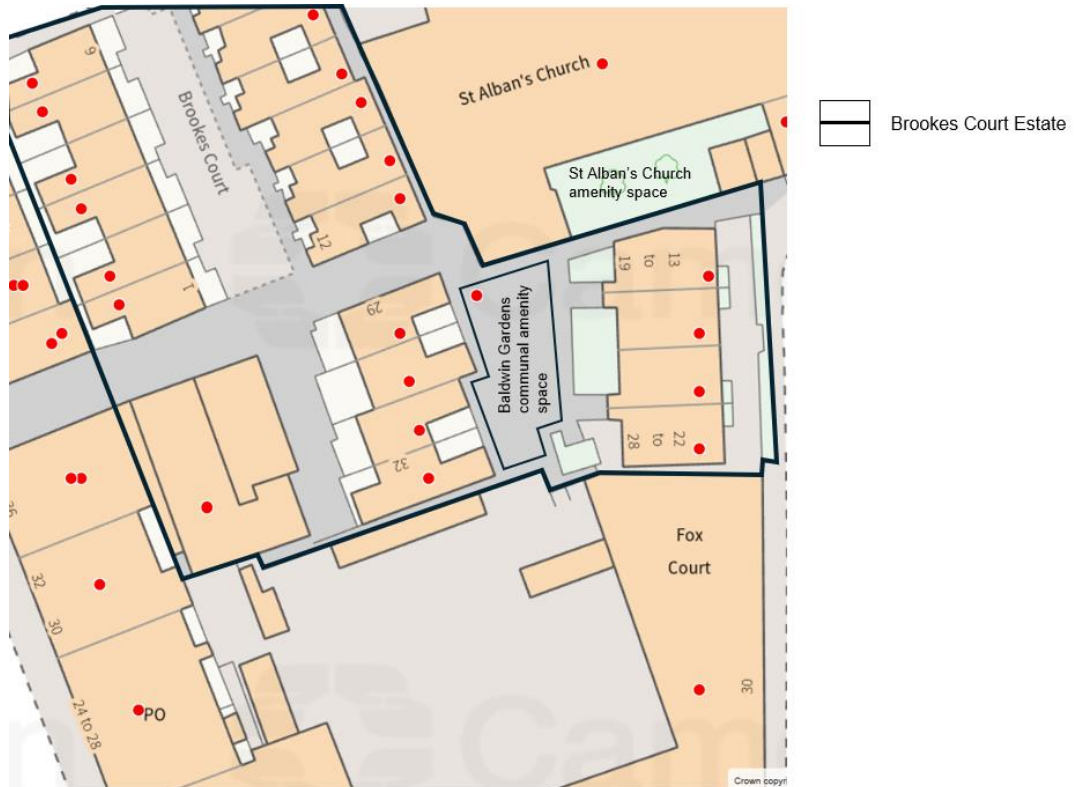


Figure 22 Properties and amenity spaces tested in the Overshadowing assessment

11.42 The methodology used for assessing the overshadowing impacts of the proposed development follows the BRE guidance. The report shows that the rear gardens of nos. 30 and 31 Brookes Court respectively would experience reductions dropping from 30% to 0% and 4% to 0% on the 21st March. It is important to note that, even in this scenario, the gardens would continue to receive intermittent direct sunlight for between 1 and 90 minutes, retaining some level of sunlight and amenity value during the early spring month (see figure 23 below).

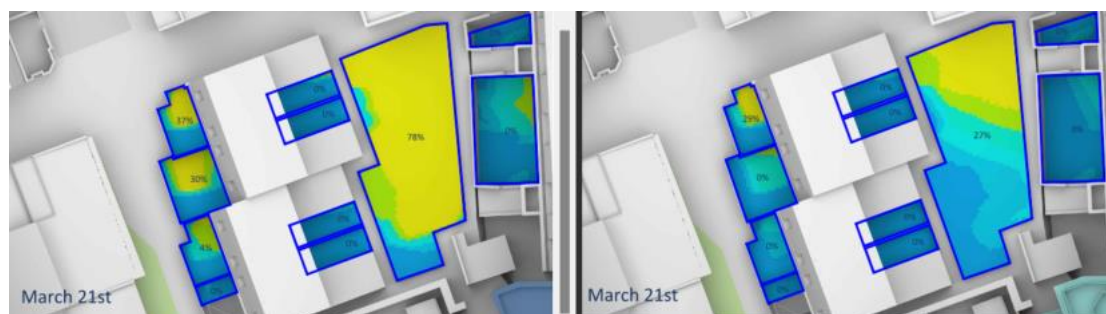


Figure 23 Existing (left) and Proposed (right) overshadowing of rear gardens of no. 30 and no. 31 Brookes Court

11.43 While the March results in the tables below show a shortfall against the BRE SoGH target, it must be noted that the existing gardens already have very low

sunlight levels in March (especially no. 31). The assessment is conservative and does not account for existing shading from vegetation, which already limits sunlight to these gardens. By April, the gardens of nos. 30 and 31 achieve comparable sunlight levels to the existing situation, and by May–June, over 50% of the garden areas receive at least 2 hours of direct sunlight. This coincides with the main period of garden use in late spring and early summer. Given the limited duration of the transgression, the existing low sunlight levels, and the seasonal recovery, the overall impact on garden amenity is considered temporary and is therefore considered acceptable.

No 30 Brookes Court	March	April	May	June
Existing	30%	60%	78%	84%
Proposed	0%	60%	78%	84%

Table 8: No. 30 rear garden overshadowing (% area receiving 2hrs sun in day)

No 31 Brookes Court	March	April	May	June
Existing	4%	60%	74%	79%
Proposed	0%	47%	74%	79%

Table 9 No. 31 rear garden overshadowing (% area receiving 2 hrs sun in a day)

11.44 In addition, there would also be a transgression to the south-west element of the communal amenity space in Baldwin Gardens, reducing the area receiving at least 2 hours of sunlight on 21st March from 78% to 27%. This space includes three mature trees with wide canopies which already limit sunlight penetration in the existing situation (see figure 24 below).

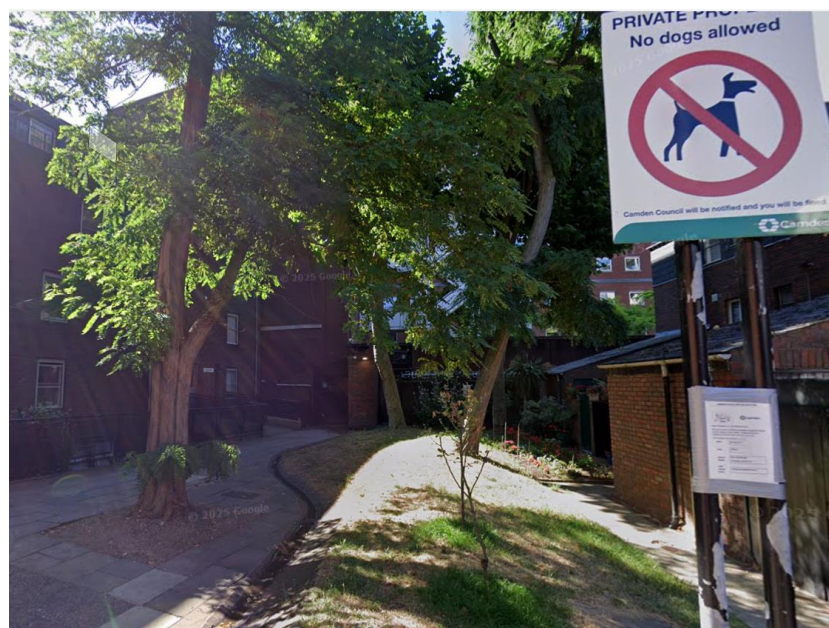


Figure 24 Baldwin Gardens communal amenity space

11.45 The BRE Report recommends testing on 21 March, but also notes that 21 June can be used as a supplementary date. The applicant has additionally provided results for 21 April and 21 May, which show that approximately 86%

and 98% of the area respectively would receive at least 2 hours of direct sunlight (see figure 24 above). While the March results indicate a transgression, the space achieves compliance with the BRE target for at least 50% of the area to receive 2 hours of sunlight from April onwards. As such, although there is a material impact in March, the level of sunlight available over the spring and summer months is considered sufficient to ensure that the overall loss of amenity would not be significant.

Baldwins Gardens communal amenity space	March	April	May	June
Existing	78%	95%	98%	99%
Proposed	27%	86%	98%	99%

Table 10 Overshadowing of Baldwins Gardens from May to June

- 11.46 Whilst the moderate impact on the amenity area of Baldwins Gardens is considered broadly acceptable, the impact is likely to be more keenly felt by those with protected characteristics. Baldwins Gardens includes social housing with council or housing association tenants who will likely be users of this amenity space. People with disabilities, older adults (particularly those over 65), and some ethnic groups are more likely to live in social or affordable housing. As such, the amenity impact on the outdoor spaces is likely to have a greater impact on those with certain protected characteristics, including disability, age, and race. Nonetheless, the impact is considered moderate, and given the start of the summer conditions, remains acceptable overall (see table 10 above).
- 11.47 To help mitigate any impacts to Baldwins Gardens a financial contribution of £71,750 towards improvements or enhancements to Baldwins Gardens would be secured.
- 11.48 The impact in respect of biodiversity is covered in the Landscaping, Trees, Greening, and Biodiversity section of the report.

Overshadowing – Brookes Market

- 11.49 Brookes Market lies within 160m to the northeast of the site. There are 10 large deciduous trees within the space that will be in full leaf in the summer months and are likely to cast significant shadow on the amenity space. The assessment shows significant transgression on the public open space from the proposed development with 6% of the space retaining good sunlighting on 21st March compared with 14.8% in the existing situation. However, the open space is already heavily enclosed by surrounding buildings of between four and six storeys in height, resulting in inherently constrained sunlight conditions. The reduction therefore represents a relative worsening of an already shaded environment rather than a material change to a space that currently enjoys good levels of sunlight. The open space already has a transient character that is predominantly covered in hard surfacing, with no benches or lawn areas where an individual or group may wish to spend a long period of time enjoying sunlight. There are also mature deciduous trees providing seasonal variation in shading.

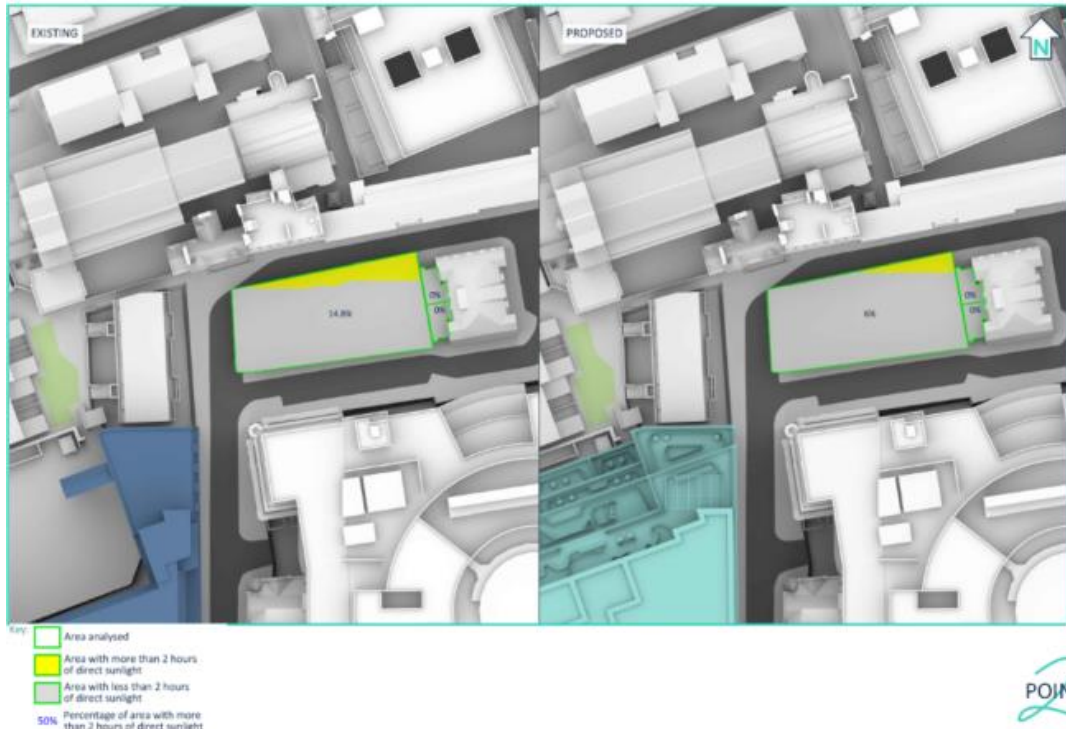


Figure 25 Existing and proposed overshadowing of Brookes Market

11.50 The analysis also details the cumulative effect on Brookes Market open space, taking account of the recently approved 2 Waterhouse Square development. With both schemes in place there would be a cumulative transgression resulting in the open space falling significantly short of the BRE 50% guideline in terms of the sun on ground indicator, retaining only 0.6% with over 2 hours sun a day. The SHoG diagrams for the existing, proposed and cumulative situations are shown in figure 26 below for comparison purposes.

Sun on Ground Analysis – March 21st

Fox Court, London
Overshadowing Studies | October 2025



Sun on Ground Analysis – March 21st (Cumulative)

Fox Court, London
Overshadowing Studies | October 2025

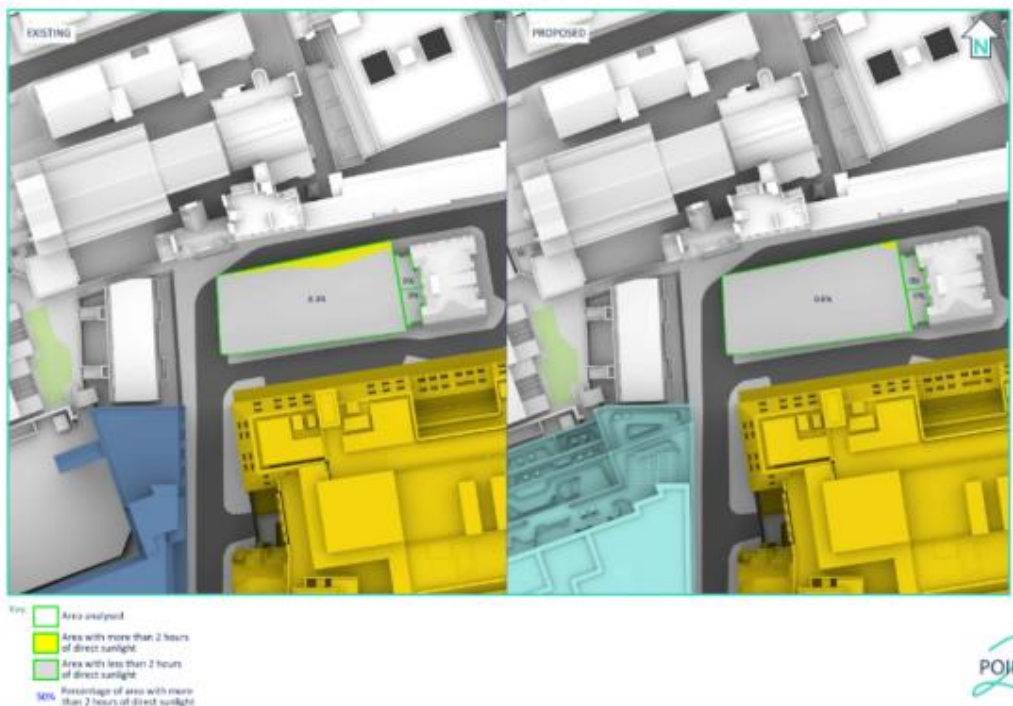


Figure 26 Existing and proposed (top) and existing and proposed (cumulative) (bottom) overshadowing of Brookes Market (21st March)

- 11.51 The overshadowing studies also include transient overshadowing snapshots of the space taken on 21st March (Spring Equinox), 21st June, and 21st December. Throughout the majority of the day on 21st March the analysis shows that there would be no appreciable difference in the SoGH between the existing, proposed and cumulative scenarios. The main period of the day where there is additional overshadowing caused by the proposed development is in the afternoon between 13:00 and 15:00. This is limited to

a small area of the northern part of the amenity space (see Figure 23 below).

Transient Sun Path Analysis – March 21st

Fox Court, London
Overshadowing Studies | October 2025

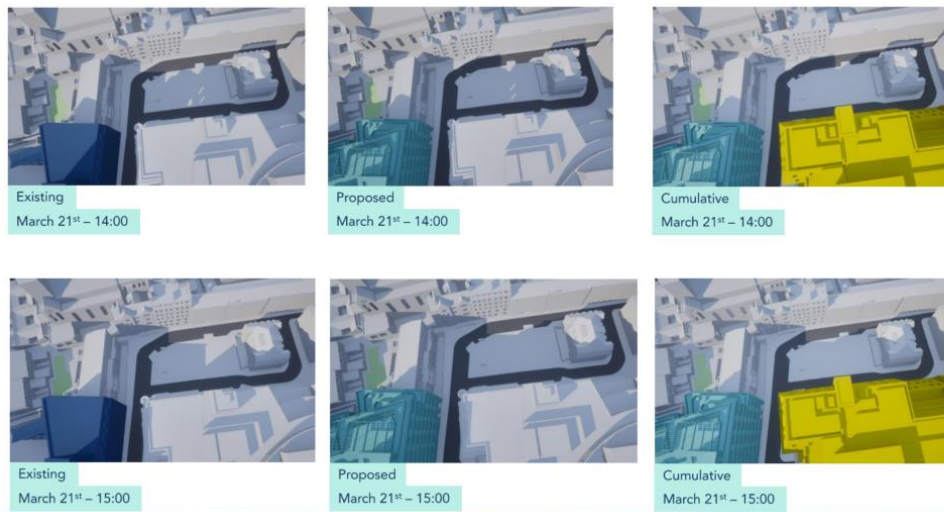
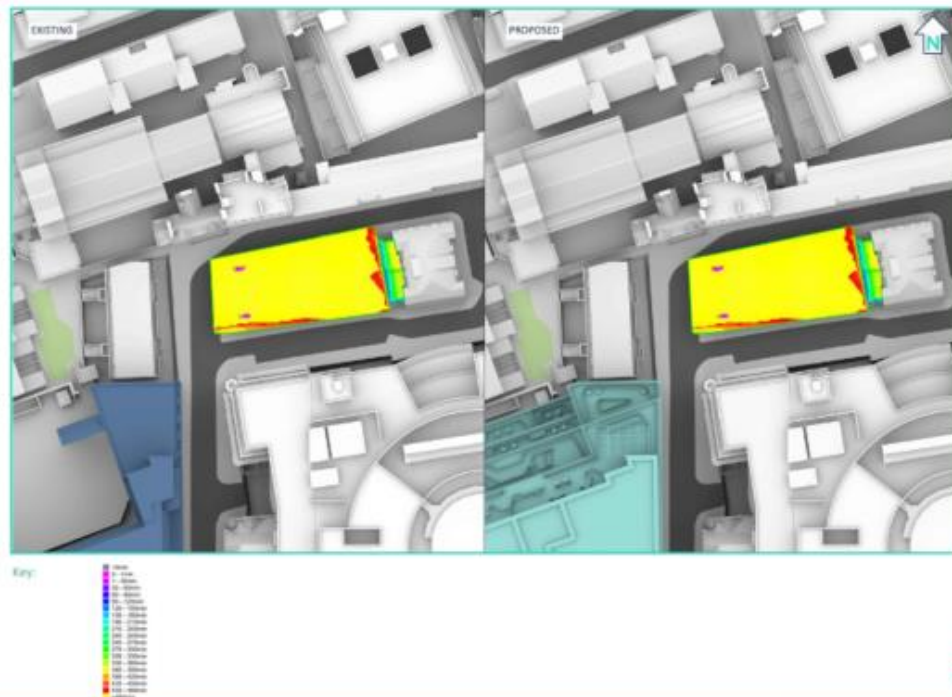


Figure 27: Existing, proposed and cumulative sun on ground hours diagram of Brookes Market on 21st March

- 11.52 It must be noted that during the summer months (21st June) the majority of the space will benefit from sunshine for considerably more than 2 hours a day – shown in Figure 27 below showing that the difference between the 21st March and 21st June situation is considerable.

Time in Sun Analysis – June 21st

Fox Court, London
Overshadowing Studies | October 2025



Time in Sun Analysis – June 21st (Cumulative)

Fox Court, London
Overshadowing Studies | October 2025

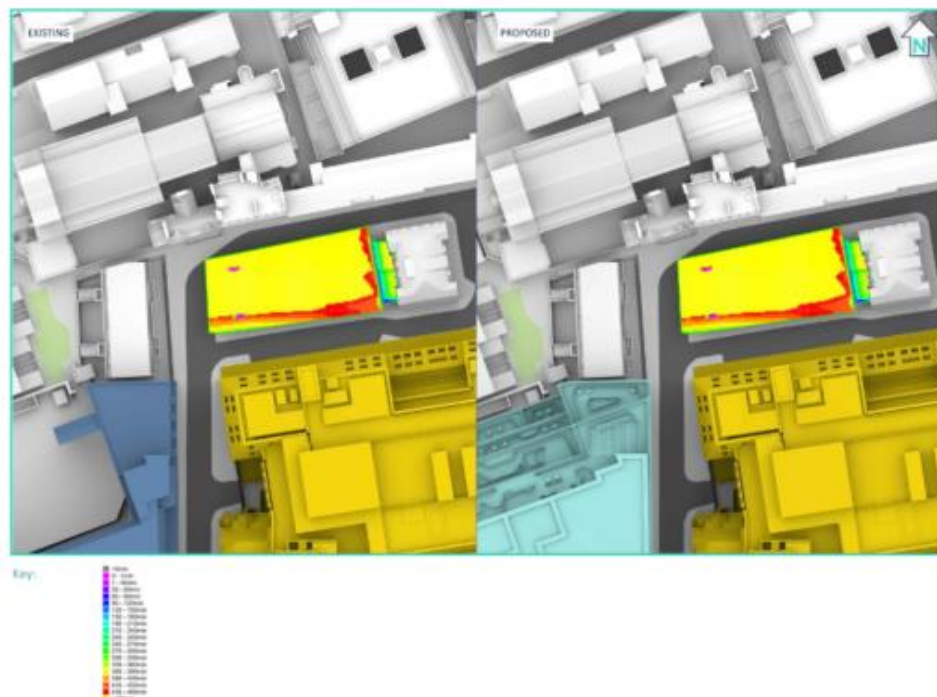


Figure 27 Existing, proposed and cumulative overshadowing of Brookes Market (21st June)

Conclusion – daylight and sunlight and overshadowing

- 11.53 Whilst the impacts on some of the surrounding properties are notable, most would be commensurate with the local context and the nature of Central London as it continues to support growth and effective use of land.
- 11.54 The daylight and sunlight effects of the proposed development have been fully assessed in accordance with the BRE Guidelines. The results show that

the majority of surrounding residential properties will continue to meet or remain close to BRE targets. There are some major adverse impacts, to living spaces at no. 33 Brooke Street which is to the rear of the commercial development at no.150 Holborn. Any additional development to the site would have a disproportionate impact on daylight to this residential block, given the narrow width of the service yards that separate the sites. The situation is also exacerbated by the inset balconies overhanging the windows that cut sky visibility from above.

- 11.55 Although there are major transgressions in daylight distribution to the bedrooms of no. 24–28 Gray’s Inn Road, the improvements in VSC and the secondary importance of bedrooms in daylight and sunlight terms mean that the overall impacts are considered acceptable.
- 11.56 At Brookes Court, all but one window meets the BRE daylight targets, and while a small number of west-facing rooms record sunlight reductions, these are influenced by low baseline values and the orientation of the façade rather than by the proposed development. The BRE methodology is primarily intended for assessing south-facing windows, and in this case the absolute change in sunlight would be limited and unlikely to be perceptible to occupants.
- 11.57 The impact on residential properties surrounding the site is generally moderate and considered acceptable. However, the impacts on no. 33 Brooke Street are significant and the impact on the relevant flats within the residential block would conflict with the part of Policy A1 which seeks to protect the amenity of communities and neighbours.
- 11.58 In terms of overshadowing of Baldwins Gardens, while the proposal would result in a reduction in sunlight to part of the Baldwins Gardens communal amenity area in March, compliance with BRE standards would be achieved from April to June, ensuring good levels of sunlight during the spring and early summer months. The resulting impact on amenity is therefore considered moderate and acceptable. Although the effect may be more keenly experienced by residents with protected characteristics, the overall level of impact is not considered significant or discriminatory in planning terms. To help mitigate these impacts a Baldwins Gardens Landscaping Mitigation Contribution of £71,750 would be secured by s106 agreement in accordance with Local Plan policy A1.
- 11.59 In terms of overshadowing of nearby public open space, the assessment shows that the proposed development would result in a notable reduction in sunlight availability to Brookes Market, with the cumulative scenario (including the approved 2 Waterhouse Square development) retaining only 0.6% of the area receiving at least two hours of sunlight on 21 March, compared with 14.8% in the existing situation. While this appears to be a significant reduction the existing condition is already well below the 50% BRE guideline, the space is already heavily enclosed by surrounding buildings of between four and six storeys and therefore experiences

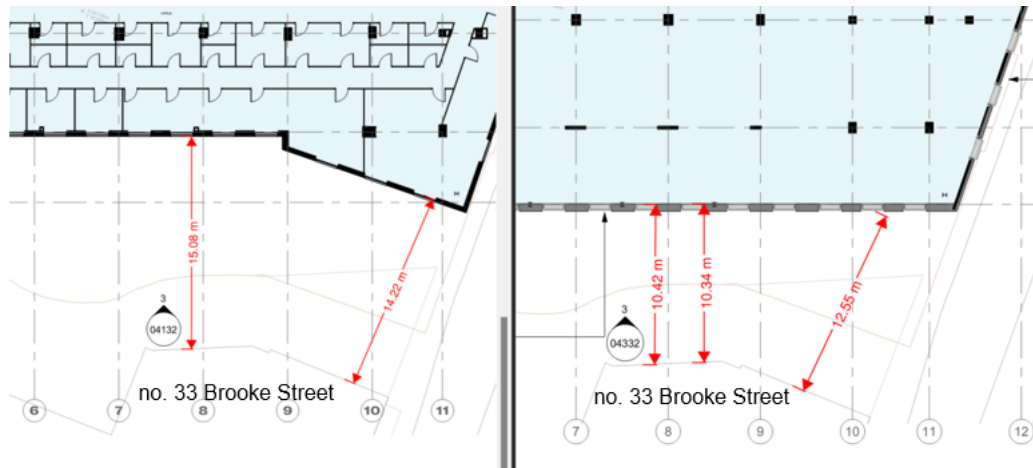
inherently low sunlight levels. The analysis indicates that additional overshadowing would be limited to a small northern portion of the space and for a short period in the afternoon, with sunlight availability remaining substantially higher during the summer months. The space is primarily hard surfaced and functions more as a pedestrian thoroughfare rather than a recreation area. In this dense Central London context, where sunlight access to ground-level spaces is already constrained, the reduction is not considered to result in a materially harmful impact on the amenity value or usability of the open space. To help mitigate these impacts a Brookes Market public realm improvements contribution of £30,750 would be secured by s106 agreement in accordance with Local Plan policy A1.

Overlooking / Privacy

- 11.60 The nearest neighbouring residential buildings are no. 33 Brooke Street which is the residential development to the rear of 150 Holborn which lies to the south, nos. 24-28 and 30-32 Gray's Inn Road to the northwest and Brookes Court, Baldwins Gardens to the north. Further to the southwest are properties within a mixed-use development at no. 7 High Holborn which is located on the west side of Gray's Inn Road and whose windows look over towards the application site. The impact on the amenity of these properties in terms of overlooking / privacy is considered in more detail below. The properties that lie to the north of Brookes Market, including no. 16, are located over 30m to the northeast of the site and would not experience any overlooking or loss of privacy as a result of the proposal.
- 11.61 The Council's Amenity CPG recommends an 18m separation distance between the windows of habitable rooms directly facing each other.

33 Brooke Street

- 11.62 The northern elevation of no. 33 Brooke Street is overlooked by existing office windows on the southern elevation of the application building from 1st to 8th floors. The separation distance between the buildings currently ranges from approx. 14.2m to 15m. The proposed extension would introduce new window openings on the southern elevation which would be within approx. 12.5m to 10.3m of the northern elevation of no. 33 (see figure 28 below). Although some of the new office window openings would have oblique views towards the residential window openings and terraces on the northern elevation of no. 33 some of the office windows would face directly towards them. This is particularly relevant to the office floors from 1st to 5th floors. As the separation distance would be less than 18m, mitigation measures would be required to ensure there is no direct overlooking from these office windows towards the habitable rooms and terraces at no. 33. The windows on the southern side elevation of the extension to the south of the building from 1st to 5th floor levels would be required to be obscure glazed and non-opening up to an internal height of 1.7m. A condition would be attached to secure this (condition 34).



Existing 1st floor plan
 Proposed 1st floor plan
 Figure 28 Existing (left) and proposed (right) 1st floor plans showing separation distances between the southern elevation of the application site and no. 33 Brooke Street.



Figure 29 Photo showing existing relationship between no. 33 Brooke Street (right) with existing southern elevation of the application site which is to be extended

11.63 A roof terrace is proposed at 8th floor level, on the southern side elevation facing no. 33 Brooke Street. Due to the internal floor-to-ceiling heights of the commercial extension, the terrace would sit approximately 5 m above the 6th floor roof level of no. 33 and would not provide any direct views into the windows or terraces of the flats below. The terrace would also be set back around 0.4 m from the main southern façade, which would limit the potential for downward or oblique views towards the 5th and 6th floor roof terraces at no. 33. Given the relative height difference, separation distance, and limited angle of view, it is considered that the proposed terrace would not result in any material loss of privacy to neighbouring occupiers in this residential block.

24-28 Gray's Inn Road

11.64 The proposed roof terraces at 2nd to 8th floor levels on the northern extensions adjacent to Baldwins Gardens would be located to the east of the rear-facing bedroom windows at No. 24–28 Gray's Inn Road. The residential building has 2 sets of bedroom windows on each side of an internal centrally located lift and staircore. The roof terraces at 1st, 4th, 5th, 6th, 7th and 8th floor levels are either over 18m away from the rear elevation of the building or the

roof terraces are on the roofs of extensions that are closer but above a storey higher (approx. 3.1m) than no. 24-28. Any views from the terraces would be interrupted by the proposed fire escape stair that runs up the eastern elevation of the extensions from ground to 7th floor.

- 11.65 The roof terraces at 2nd and 3rd floor levels are between 10.25m and 11.3m from the bedroom windows on the rear of no. 24-28 Gray's Inn Road (see figure 30 below).

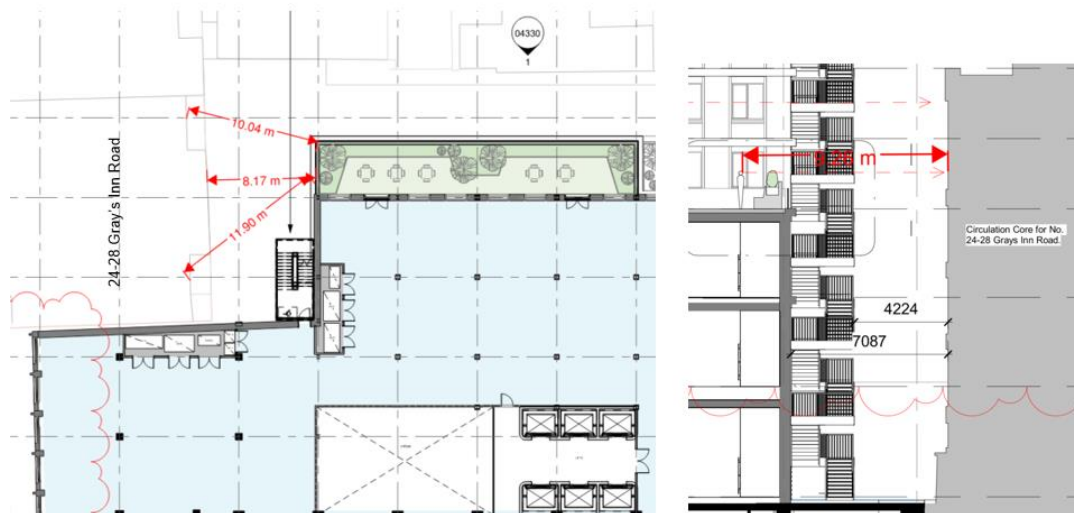


Figure 30 Proposed 2nd floor plan (left) and section (right) showing separation distance from roof terrace to rear elevation of no. 24-28 Gray's Inn Road

- 11.66 The terraces are north-facing and would include perimeter planters with integrated seating measuring 1.2m in height and planting at 0.5m (measuring 1.7m in total) along their western edge to partially screen views towards the neighbouring windows. Due to the orientation of the windows and the roof terraces particularly at 2nd floor level views from the roof terrace to the bedroom windows would mainly be oblique. On balance, although residents may perceive a minor change in privacy, it is not considered to result in a materially harmful loss of privacy.

- 11.67 To further mitigate any potential overlooking, it is recommended that a condition be attached to any planning permission requiring the submission of details of the roof terrace screening for these terraces to prevent direct views into neighbouring windows (condition 27). With such controls in place, the terraces would be appropriately managed, ensuring that the privacy of residents at No. 24–28 Gray's Inn Road is safeguarded and that the development remains acceptable in amenity terms.

- 11.68 No. 30-32 Gray's Inn Road bounds the northwest corner of the site. The windows on the rear elevation of the building would be approximately 11m away from the western side elevations of the extensions that would infill the existing courtyard area within the application site. Any views from the eastern side of the proposed 2nd and 3rd floor roof terraces towards the windows on the rear elevation of this building would be oblique and would

not result in any harmful overlooking. As you move along the 2nd floor terrace it may be possible to gain more direct views however this would be at a distance of over 18m and would not require any mitigation measures to be introduced.

Brookes Court, Baldwin's Gardens

- 11.69 The properties in Brookes Court, Baldwin's Gardens, lie to the north of the site and are orientated west-east, meaning that the majority of windows do not directly face the application site. The proposed office windows and terraces would not directly look into the windows of the properties within Brookes Court. The office windows and terraces above 1st floor level would look out over the roofs of the residential blocks rather than down into the gardens and any views into the front or rear gardens of from the office windows or terraces would be oblique.

7 High Holborn

- 11.70 The properties within the mixed development at no. 7 High Holborn are located approximately 23m to the west of the application site. The proposal would include new roof terraces which are mainly located within the northern and southern parts of the building which are approximately 30m away. Given the locations of the roof terraces and separation distances between the buildings it is considered that there would be no overlooking from the new roof terraces to the windows of the flats in the upper floors of no. 7 High Holborn that have views over to the application site.

Outlook

- 11.71 The application site is surrounded by residential properties that lie to the south (33 Brooke Street), the northwest (24-28 Gray's Inn Road) and to the north (Brookes Court Estate, Baldwin Gardens).

No. 33 Brooke Street

- 11.72 No. 33 Brooke Street would be one of the nearest neighbouring properties whose outlook would be affected by the proposal. It is a residential block of 13 flats that includes windows and balconies on the western, northern and eastern elevations. The southern part of the application building currently has a stepped footprint and varied height, ranging from four to eight storeys. The proposed extension would infill the recessed sections from first-floor level, creating a more continuous and uniform eight-storey façade. This alteration would reduce the separation distance between the north elevation of No. 33 and the southern elevation of the application building by between 1.7m and 4.7m from approximately 14.2m to 15m to 12.5m to 10.3m respectively.

- 11.73 Although the proposal would bring the building closer to the northern elevation of No. 33, the retained separation distances of between 10.3m – 12.5m are considered sufficient to prevent an undue sense of enclosure. The flats within No. 33 are mainly dual-aspect, with the majority of their primary windows facing east and west rather than directly towards the

application site. As such, the proposed infill extension would not materially diminish the overall quality of outlook or daylight enjoyed by occupiers. While views from some north-facing windows and balconies would experience a more enclosed aspect, this would be read in the context of the site's dense urban surroundings, where close spatial relationships between buildings are characteristic. On balance, the proposal is therefore considered to have an acceptable impact on the outlook from No. 33 Brooke Street.

No. 24-28 Gray's Inn Road

- 11.74 No. 24–28 Gray's Inn Road is six storeys in height and adjoins the application site to the northwest. An existing 17m high external fire escape stair lies approximately 2.4 m–4 m from the rear elevation. Its structural supports and partially enclosed flights currently restrict outlook from around half of the bedroom windows on this elevation, while the remainder benefit from a more open aspect across the courtyard area within the site. The proposal includes the removal of this fire escape and its replacement with a new stair and a three-storey west-facing façade within the courtyard, set back approximately 5.8 m and 8.4 m respectively. These increased separation distances would improve the overall outlook from the affected bedroom windows compared with the existing situation (refer to figure 31 below).



Image 02: View from room R2/62 in the existing situation



Image 03: View from room R2/62 in the proposed situation

Figure 31: (Top) Existing outlook from window in rear of no. 24-28 Gray's Inn Road: (Bottom) Proposed outlook from window in rear of no. 24-28 Gray's Inn Road

- 11.75 While the proposed extension would introduce additional built form within the courtyard, the increased separation distance and removal of the existing enclosed stair structure would help to ensure that outlook from the rear-facing bedroom windows remains satisfactory. The development would not

result in an undue sense of enclosure or overbearing impact, and the arrangement of windows would continue to provide an acceptable visual relationship between the two buildings. On this basis, the proposal is considered to maintain an appropriate standard of outlook for residents of No. 24–28 Gray’s Inn Road.

Brookes Court, Baldwin Gardens

- 11.76 The existing building currently provides visual relief between its neighbours to the north due to the large open courtyard area in the northern part of the site. The properties in Brookes Court, Baldwin Gardens, lie to the north of the site and are orientated west–east, meaning that no windows directly face the application site. However, a number of these properties have modest rear gardens and there is a communal amenity area which would gain views of the proposed extensions when residents are using the private and public external amenity spaces. While the extensions would inevitably alter the visual backdrop to these gardens, they would be seen in the context of an established urban environment characterised by taller buildings. As such, the development is not considered to result in an unacceptable sense of enclosure or visual dominance when viewed from neighbouring gardens.

Noise disturbance

Plant and machinery

- 11.77 The proposed development includes the installation of new building services plant and machinery split between the basement and a roof level plant enclosure. The building will be served by several Air Source Heat Pumps (ASHPs), air handling units and ventilation fans.
- 11.78 A Noise Impact Assessment has been carried out to support the planning application which has been reviewed by the Council’s Environmental Health Officer (EHO).
- 11.79 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, Camden’s Local Plan, and BS 4142:2014 “Methods for rating and assessing industrial and commercial sound”. The EHO has confirmed that noise and vibration from demolition and construction, operational noise including noise from deliveries, servicing, and waste collection and building plant has been adequately considered.
- 11.80 Environmental sound measurements were taken to establish the baseline sound conditions experienced around the site. Results from the survey have informed the noise impact assessment, particularly in deriving noise emission limits for new building services plant.
- 11.81 The site is subject to relatively high sound levels along Gray’s Inn Road, which are attributed to road traffic vehicles and people noise. Noise sensitive receptors to the rear of the site along Brooke Street experience relatively lower sound levels, although it is noted that distant sound from Holborn is

audible.

- 11.82 The Council's Environmental Health Officer has reviewed the information and has confirmed that the appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, NPPF, Planning Practice Guidance on Noise, Local Plan policies and BS 4142:2014 "Methods for rating and assessing industrial and commercial sound." They are satisfied that the plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building. The noise assessment indicates that any proposed installation of plant should be capable of achieving Camden's environmental noise criteria at the nearest and potentially most affected noise sensitive receptors. Although a noise assessment has been submitted with the application, the Council's Environmental Health Officer has recommended a further condition requiring detailed noise data and mitigation measures to be submitted prior to commencement of development. This is because the assessment provided is based on indicative plant specifications and locations. The condition will ensure that the final, installed equipment is properly designed and assessed to meet the required noise criteria, and that post-installation testing is undertaken to verify compliance (condition 4). A condition would also be attached to secure the installation of anti-vibration measures prior to any agreed plant being installed (condition 38).

Noise disturbance from new roof terraces

- 11.83 The proposal includes outdoor roof terraces on the 1st to 8th floors of the northern side extensions which become larger in size moving up the floors. In total the roof terraces have capacity for 370 people. It is proposed to create a larger communal terrace measuring approximately 350 sq. m which extends across the eighth floor level. This would be separated into 3 zones (i) a flexible adaptable zone on the eastern roof section to accommodate outside activities, (ii) a social space in the central section which would include integrated planters and (iii) an intimate zone on the western side that would provide quieter spaces (refer to figure 32 below). Given the size and proximity of surrounding residential properties, it is considered necessary to control the use of the roof terrace spaces to prevent potential noise and disturbance. Conditions would be required to restrict the hours of use and limit access to office users only and to restrict the playing of any amplified music for all the new roof terraces from 1st to 8th floors (conditions 33 and 32 respectively). Due to the size of the 8th floor communal terrace, a detailed operational management plan would also be required by s106 legal agreement to ensure that any potential private events would be appropriately managed and that the amenity of nearby residents is protected. A condition would also be attached to any permission to ensure that any flat roofs that aren't marked as roof terraces within the proposed plans would not be used as roof terraces (condition 31).



Figure 32: Zoning of the proposed 8th floor roof terrace

- Noise and vibration from demolition and construction
- 11.84 The management of noise and vibration during the demolition and construction phases is covered by the Control of Pollution Act 1947 and the implementation of best practicable means to reduce noise to a minimum. A Construction Management Plan (CMP) proforma has been submitted with the application. The majority of the objections received to the application are concerned about noise and disturbance during the construction phase. The requirement for a detailed CMP to be submitted once a principal contractor is appointed shall be secured by S106 legal agreement should planning permission be granted. The CMP would be reviewed by the Council's Transport, Highways and Environmental Health teams prior to it being signed off.
- 11.85 Objections have been raised to the application on the grounds that the effects on the St Mungos homeless lodge on other vulnerable residents from the development have been ignored. The law requires Council's to consider the impacts from Council decisions on persons with protected characteristics. However whilst potentially more vulnerable to the temporary impacts of construction near their homes from being more likely to be in their home or accommodation, this type of impact associated with developments does not undermine the interests of those with protected characteristics to any significant and lasting effect so as to single out this group discriminately. The CMP would also assist vulnerable or disabled people as well as others who have to be present in their homes during the construction. The development is therefore not considered to conflict with the aims of the Public Sector Equality Duty

- Noise from deliveries, servicing and waste collection
- 11.86 A draft Delivery and Servicing Plan and Operation Waste Management Plan have been submitted with the application which sets out that these activities will take place during times aligning with Camden's standard requirements. A detailed Delivery and Servicing Plan would be secured by S106 legal agreement if planning permission were granted to help ensure that any operational impacts associated with delivery and servicing movements will be mitigated.

11.87 Deliveries and servicing shall also be restricted to the hours of 08:00 to 20:00 in line with CPG Amenity guidance to ensure these activities did not cause unreasonable disturbance to nearby neighbouring residents. These hours shall be secured by condition (condition 39).

Amenity conclusion

11.88 It is acknowledged that the proposed development would result in some notable reductions in daylight and sunlight to surrounding residential properties. However, these are generally assessed as ranging from negligible to moderate and, on balance, are considered acceptable within this dense urban context. Some of the affected dwellings, such as those within Brookes Court, comprise social housing which may be occupied by individuals with protected characteristics (including disability, age, or race). However, these are where the impacts are mainly considered acceptable. There are some major adverse impacts to bedrooms within 24-26 Gray's Inn Road. However, the improvements in VSC and the secondary importance of bedrooms in daylight and sunlight terms mean that the overall impacts are considered acceptable. The major adverse impacts are more notably to the residential block at 33 Brooke Street. In respect of this block, there would be a conflict with policy A1. The flats within the block are in private ownership and so the significant impacts are less likely to have a disproportionate effect on those with protected characteristics in this regard.

11.89 There would also be overshadowing of Baldwins Gardens communal amenity space and some overshadowing of Brookes Market open space. That said, the main impact would not be over the late spring and early summer months and therefore the impacts on amenity are not considered significant and are acceptable and in accordance with policy A1, subject to appropriate mitigation.

11.90 The proposals would not cause undue harm to neighbouring privacy or outlook given the Central London location, and subject to conditions controlling hours of use of terraces, plant noise, deliveries and servicing hours, the proposals would not cause undue harm to neighbouring amenity in this regard.

12. TRANSPORT

Policy review

12.1 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.

12.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.

- 12.3 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, we are 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.
- 12.4 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 the Council's objectives, policies, and measures for achieving this goal. The Council's priorities include increased walking and cycling, improving public transport in the borough, reducing car ownership and use, improving the quality of our air, and making our streets and transport networks safe, accessible and inclusive for all.
- 12.5 On 13th November 2024, Cabinet agreed to implement the next phase of CTS for 2025 to 2028, investing in more environmentally friendly, healthier forms of travel and creating more welcoming streets and neighbourhoods. The Strategy includes commitments to:
- i. improve pedestrian and cyclist safety at junction of Gray's Inn Road/Theobald's Road approximately 250m north of the site;
 - ii. introduce traffic reduction measures on Leather Lane, approximately 250m east of the site, to improve air quality, and safety, of residents, visitors, and market traders in the area;
 - iii. introduce timed restrictions outside St Alban's C of E Primary & Nursery School on Baldwin's Gardens, approximately 100m north of the site;
 - iv. implement Healthy Streets improvements in the Hatton Garden Area where the site is located;
 - v. 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;
 - vi. deliver Better Bus Partnership which focuses on improving bus journey times and bus passenger experience by implementing upgrades to bus stop/shelter, including Countdown provision, better bus passenger information, and enhanced interchange via Healthy Streets measures to connect bus passengers to/from other public and shared transport services in local areas;
 - vii. provide Green Micromobility hubs across the Borough;
 - viii. develop a comprehensive network of electric vehicle charging 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;
 - ix. continue to expand dockless bike and e-scooter hire network;
 - x. contribute towards the implementation of the CTS Cycling Action

- Plan and Walking and Accessibility Action Plan; and
- xi. Deliver a programme of “Healthy Junction” improvements at key intersections across the Borough to improve road safety.

12.6 London Plan policies on transport of relevance include:

- Policy T1 (Strategic approach to transport)
- Policy T2 (Healthy Streets)
- Policy T3 (Transport capacity, connectivity, and safeguarding)
- Policy T4 (Assessing and mitigating transport impacts)
- Policy T5 (Cycling)
- Policy T6 (Car parking)
- Policy T7 (Deliveries, servicing, and construction)
- Policy T9 (Funding transport infrastructure through planning)

12.7 London Plan Policy T1 (Strategic approach to transport) states that Development Plans should support, and development proposals should facilitate, the delivery of the Mayor’s strategic target of 95% per cent of all trips in central London to be made by foot, cycle, or public transport by 2041.

12.8 London Plan Policy T1 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.

12.9 The Council adopted the Holborn Vision Supplementary Planning Document (SPD) on 29 January 2025. The SPD is a material consideration in decision making on planning applications alongside other planning policies. Of particular importance to this development are the Objectives HV4 of the Gray’s Inn and Hatton Garden Character Areas, which include, amongst other, commitments to:

- Investigate crossing points on Gray’s Inn Road to increase accessibility from the east.
- Improve Hatton Garden public realm to reflect and sustain the functioning of the Jewellery Quarter and attract greater footfall.

Site location and access to public transport

12.10 The site is located within the Hatton Garden Conservation Area to the north of Holborn (A40). The Site is bounded by Gray’s Inn Road (A5200) to the west, Brooke Street to the east, a commercial and residential building to the south and a mix of commercial / residential buildings to the north.

12.11 Gray’s Inn Road (A5200) and Holborn (A40) form part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is also in close proximity to Farringdon Road, which is part of TfL’s Transport for London Road Network (TLRN).

- 12.12 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent).
- 12.13 The closest London Underground stations to the site are Chancery Lane approximately 120m south of the site, Farringdon approximately 600m to the east of the site, and Holborn approximately 700m to the west of the site. Farringdon station also provides National Rail and Elizabeth Line services.
- 12.14 The closest bus stops on Gray's Inn Road and Holborn are approximately 50m from the site.
- 12.15 The site is accessible from the Strategic Cycle Network with Cycleway C6 to the east at Farringdon Road and C41 to the west at Red Lion Street. Both Cycleways link the site with King's Cross railway station. The cycle lanes on Gray's Inn Road also provide a direct link between the site and King's Cross railway station.
- 12.16 The nearest Santander cycle hire docking stations are located on Red Lion Street, Holborn Circus, New Fetter Lane, and Hatton Garden.
- 12.17 There are dedicated parking bays for dockless rental e-bikes and rental e-scooters in the area, namely on Gray's Inn Road, Baldwin's Gardens, Red Lion Street and Holborn Circus. However, these bays are already showing signs of overcapacity and increasing demand.
- 12.18 Camden's Transport Strategy has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows grades between 2 and 4 in the vicinity of the site, which indicates significant opportunities for improvement, considering it is the Council's aspiration (and target) for the STAL score to be 6b. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.

Trip generation

- 12.19 The proposals seek to increase the existing floor area by 8,314 sq. m (GIA) which is circa 9,316 sq. m (GEA) to provide 22,601 sq. m (GIA) which is approx. 24,635 sq. m (GEA) of commercial space. The TRICS database was used to derive the anticipated total person trip rates and net impact of the proposed development. The net change in multi-modal trips, presented in Table 8 of Transport Assessment Addendum, is reproduced here:

Mode	AM Peak	PM Peak	Daily
Underground	+103	+95	+723
Train	+96	+88	+671
Bus etc.	+29	+27	+205
Taxi	+6	+6	+45
Motorcycle etc.	+2	+2	+17
Car Driver	-20	-18	-141
Car Passenger	0	0	0
Bicycle	+15	+13	+102
On foot	+12	+11	+85
Other	0	0	0
Total	+243	+223	+1,709

Table 11: Forecast net person trips

12.20 The anticipated high volume of the walking trips is likely to be made from London Underground stations at Chancery Lane, Farringdon (also providing rail services) and Holborn, the bus stops on Gray's Inn Road and Holborn, and commercial, entertainment, shopping, and restaurant venues in Holborn. Considering the increase in active travel to and from the site, the applicant will be requested to provide financial contributions towards the aforementioned commitments in our CTS delivery programme.

12.21 The Active Travel Zone (ATZ) assessment within the Transport Assessment reviewed three key walking and cycling routes to nearby destinations. Routes to medical centres and places of worship were not included. Whilst Holborn Mosque does not necessarily warrant an analysis given its proximity to the site, the route linking the development and St Bartholomew's Hospital is considered relevant. The analysis of the three routes shows some areas of concern on Gray's Inn Road and Brooke Street which mainly stem from existing deficiencies, temporary works, and maintenance issues.

Travel planning

12.22 A draft travel plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. The targets for active travel will be updated following the results of the initial travel survey. Modal share projections for walking and cycling will need to be in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

12.23 A Travel Plan and associated monitoring and measures contribution of £11,348 will be secured by legal agreement if planning permission is granted.

Access and permeability

12.24 The primary pedestrian access to the site will be retained from Gray's Inn Road, alongside the entrance to the café and emergency exit. A secondary pedestrian access will also be provided to the rear of the building via Brooke Street. Car, cycle and delivery and service access to the site will be taken

from Brooke Street. There will be a separate access for cycles and servicing via Brooke Street.

- 12.25 The proposal will remove the existing 26 car parking spaces (further detail is provided in the 'car parking' section).
- 12.26 The amendments to the ground floor of the Gray's Inn Road façade include a rearranged entrance and the introduction of planters at ground floor level. This results in a more generous public realm, equating to an increase of 38 sq. m, achieved through the removal of the existing ramp and staircase on Gray's Inn Road frontage. The proposed development would result in a 0.48m increase in the average footway width compared to the existing situation without the bus stop, which has been relocated. The Pedestrian Comfort Level Assessment shows that the proposed frontage along Gray's Inn Road would have a slight net positive impact on the pedestrian environment.
- 12.27 The new café entrance on Gray's Inn Road and the new internal bin store on Brookes Street open out onto the highway. When open the bin store double doors would only retain 1m of pavement space which could create a potential obstruction or safety hazard for pedestrians. A condition would be attached to ensure that external doors only open inwards (condition 43).

Cycle parking

- 12.28 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 B1 use (business offices):
- 1 space per 75 sqm (GEA) long stay (i.e. at least 128 spaces calculated on the floorspace uplift),
 - first 5,000 sqm 1 space per 500 sqm, thereafter 1 space per 5,000 sqm (GEA) short stay (11 spaces calculated on the floorspace uplift).
- 12.29 It is proposed to provide 394 long stay cycle parking spaces in the existing basement car park. This is in accordance with the London Plan cycle parking standards and the Camden cycle parking requirement of providing 20% additional cycle parking above the London Plan standards. Of the long stay cycle parking spaces:
- 5% or 20 cycle parking spaces will be accessible spaces on Sheffield stands suitable for larger/adapted cycles.
 - 20% or 79 cycle parking spaces will be provided on standard Sheffield stands.
 - 75% or 296 cycle parking spaces will consist of double stacker stands.
- 12.30 Access to the basement cycle store will be via the existing vehicle ramp, which is proposed to be repurposed and upgraded. An existing lift will provide access from the ground floor to the basement cycle store for larger/adapted cycles and cyclists who do not wish to wheel their bike

up/down the existing vehicle ramp. Access to the lift will be via an entrance to the building located in the courtyard to the south of the site.

- 12.31 A cycle repair station will be provided in the cycle store. The proposed development will also provide shower/changing facilities and lockers for cyclists. A total of 33 showers and communal changing rooms will be provided and a total of 394 lockers will also be provided.
- 12.32 A total of 17 short stay cycle parking spaces will be provided at ground level. Due to footway constraints along Gray's Inn Road and Brooke Street, it is proposed that short stay cycle parking will be provided within the courtyard space between the site and development to the south and the Brooke's Market Square area which is proposed to be improved with landscaping. Any visitor cycle parking provided on public highway will attract a fee of £300 per Sheffield stand. Nine stands would be required equating to £2,700. This would be secured by s106 legal agreement.
- 12.33 The installation and retention of the long stay cycle stores shall be secured by condition (condition 20).

Car parking and vehicle access

- 12.34 The site is located in controlled parking zone CA-D (Kings Cross Area), which operates 08:30-18:30 Monday to Friday, and 08:30-13:30 on Saturday.
- 12.35 The development is proposed car-free, which would be secured by legal agreement if planning consent were granted. The existing basement car park which currently accommodates 26 parking spaces would be removed. A disabled parking bay, accessed from Brooke Street, would be provided at ground level in the courtyard area between 150 Holborn and the site. The removal of the existing car parking would be secured by s106 legal agreement and a condition would be attached to secure the provision of a disabled car parking space (condition 21).
- 12.36 The significant reduction in on-site car parking provision could lead to visitors arriving at the site and being unable to find somewhere to park. Officers expect the large majority of visitors to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. This would put pressure on infrastructure which has been provided primarily for local stakeholders. An additional electric vehicle charging point (fast charger installed on an island buildout) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 would be secured by legal agreement in accordance with CPL Policy A1.

Controlled Parking Zone (CPZ) review

- 12.37 Objective 2 of the CTS sets out to reduce car ownership and use, and motor traffic levels in the borough, and features several measures in support of achieving this objective. Measure 2d 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.'

12.38 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 where the site is located 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 of single yellow lines and sessional P&D parking are extended subject to consultation and decision-making processes. Progress to date on the CTS as well as the Council's delivery plan for the period covering 2025-2028 was agreed by Camden Council Cabinet. A commitment was made to deliver a package of Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough through:

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

12.39 At present, the CA-D CPZ control hours do not extend into the evening, nor do they cover much of the weekend, 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 potential to increase on-street parking pressure which may drive demand for CPZ reviews. Considering the scale and the location of the proposed development, a contribution of £30,000 towards the CA-D CPZ review, the implementation and monitoring of any changes to the CPZ would be required.

Construction management

12.40 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A Construction Management Plan was submitted, using the Council's CMP pro-forma. However, in the absence of a principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly.

12.41 The site is located within the Hatton Garden Conservation Area, on Gray's Inn Road (A5200) and to the north of Holborn (A40) which forms part of the Strategic Road Network (SRN). Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. The Council's primary concern is public safety, but also the need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area.

- 12.42 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 residents of Brookes Court and The Lodge, 16 Brooke Street can, and do, include a number of people who are in protected groups to consider under the Public Sector Equality Duty. For example, young people and older residents may be particularly sensitive to noise and vibration disturbance. This can also be the case for those who suffer from disabilities and indeed has the potential to have even more acute impacts depending on the nature of the disability. People in these groups, and also in terms of maternity and paternity, may also be more likely to be home during construction hours meaning exposure to the impact will often be longer. The potential impacts from the demolition and the construction of the new extensions to the building (including any piling works) would be best managed through a construction management plan. The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. More detailed Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents would therefore be required and would be secured by s106 legal agreement in accordance with CLP Policy A1.
- 12.43 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. Considering the proximity of St Alban's C of E Primary School (Baldwin's Gardens) to the site, it will be necessary to restrict construction traffic to the hours of 9.30am and 3.00pm on weekdays. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed with Camden Council in advance.
- 12.44 The contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.
- 12.45 The development will require significant 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. Implementation support contributions of £30,513 and impact bonds of £32,000 for the demolition and construction phases of the development works will be secured by s106 legal agreement in accordance with CLP Policy A1.
- 12.46 The objections from local residents raise concerns about the impact of the construction activity, including construction vehicle movements and the cumulative impacts with other planned developments, including the development works at no. 2 Waterhouse Square. 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 s106 legal agreement if planning permission is granted. This will allow representatives from different groups and with different

characteristics to feed into the programme, identifying opportunities to minimise or mitigate any disproportionate impacts.

Deliveries and servicing

- 12.47 A draft Delivery and Servicing Plan (DSP) has been submitted in support of the application. The existing deliveries and servicing take place from Brooke Steet or the courtyard between Fox Court and the building to the south accessed via Brooke Street. The proposed development will provide a dedicated on-site loading bay, able to accommodate delivery and servicing vehicles up to a 7.5T Panel Van, which will be accessed from Brooke Street. The swept paths analysis provided for a 7.5T Panel Van accessing and exiting the proposed loading bay is considered acceptable.
- 12.48 The proposed development is expected to generate 40 deliveries per day, representing a net increase of 15 servicing vehicles. This equates to approximately 3.34 deliveries or servicing vehicle visits per hour. These are expected to be accommodated either within the on-site loading bay or, for occasional larger vehicles used for refuse collection, office furniture deliveries, or refit, on Brooke Street. The applicant also commits to consolidating freight to reduce deliveries by 50%.
- 12.49 A dedicated refuse store will be provided at ground level fronting Brooke Street. Refuse collection will take place on-street from Brooke Street by a private waste contractor. A dropped kerb will be provided to facilitate transfer of bins from the refuse store to the rear of the refuse collection vehicle along Brooke Street. Further details of refuse collection will be provided within the DSP.
- 12.50 Paragraph 5.20 of the draft DSP states 'Camden currently run a consolidation centre in partnership with Islington, and the applicant will explore the possibility of partnering with a London based consultation company to reduce the number of deliveries to the Site. It has previously been accepted by the City of London that consolidation can reduce the number of deliveries by 50% or more (planning reference: 19/01345/FULMAJ and 21/00272/FULMAJ)'. The applicant has confirmed their commitment to freight consolidation, in order to reduce the level of deliveries by 50% and this would be secured by a freight consolidation strategy which would be secured by condition (condition 22).
- 12.51 A detailed DSP would be secured by s106 legal agreement to help to ensure that any operational impacts associated with delivery and servicing movements will be mitigated.

Highway works

- 12.52 The applicant would be financially responsible for any works relating to changes or repairs to the highway. This includes the formation of a dropped kerb on Brooke Street. The Council may therefore seek to secure a highways contribution to make any changes or repairs to the public highway in the direct vicinity of the development. This will be secured by s106 legal agreement if planning permission is granted.

12.53 The proposed development will require extensive demolition and construction works which may cause significant damage to the public highway. A highways contribution of £50,000 will be secured by s106 legal agreement if planning permission is granted to cover the cost of any changes or repairs needed to the public highway, e.g. repaving footways and parking and loading changes directly adjacent to the site. This would also include the repaving of the footway adjacent to the Gray's Inn Road frontage.

Pedestrian, cycling and environmental improvements

12.54 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes the Council are delivering across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on the Council's ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a source of funding.

12.55 Given the site location in Holborn and in line with the anticipated increase in cycle and walking trips generated by the significant uplift of the proposed development floor area, and further promoted by the Travel Plan, a financial contribution will be required towards:

- the Holborn Liveable Neighbourhood (HLN) programme;
- improving conditions for pedestrians, cyclists, and road safety at the junction of Gray's Inn Road/Theobald's Road, approximately 250m north of the site;
- improving conditions for pedestrians, cyclists and road safety at the junction of Gray's Inn Road/High Holborn, just to the south of the site, as part of our Healthy Junctions programme, approximately 100m south of the site;
- introduce timed "healthy school street" restrictions, and other healthy streets measures, outside St Alban's C of E Primary & Nursery School on Baldwin's Gardens (and Portpool Lane), approximately 100m north of the site; and
- implement Healthy Streets improvements in the Hatton Garden Area, a key gateway for pedestrians and cyclists in particular to access the site to/from the immediate east of the development.

12.56 A contribution of £620,000, reflecting only the uplift in floorspace, would be secured by s106 legal agreement should planning permission be granted, and is proportionate to contributions secured from comparable office developments recently granted planning permission elsewhere in the borough.

Micro and shared mobility improvements

- 12.57 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these provide capacity for existing usage by residents and people who work in or visit the area. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the lower STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 12.58 A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured by a Section 106 planning obligation if planning permission is granted. 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: Transport

- 12.59 The proposals are acceptable in terms of transport implications and would accord with London Plan and Local Plan transport policies, subject to the following planning obligations being secured by S106 legal agreement:
- Travel Plan and associated monitoring and measures contribution of £11,348.
 - Off-site cycle parking contribution £2,700.
 - Car-free development.
 - Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
 - CA-D CPZ review contribution of £30,000.
 - Construction Management Plan (CMP), and Demolition Management Plan (DMP), 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 £50,000.
 - Pedestrian, Cycling and Environmental Improvements contribution of (£620,000).
 - Micro and shared mobility improvements contribution of £10,000.

13. ACCESSIBILITY

- 13.1 Policy C6 of the Local Plan seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities by

expecting all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

- 13.2 The existing building does benefit from step-free access at the main entrance from Gray's Inn Road through the existing dog leg ramp. There are 5 steps from pavement level up to the raised ground floor level. The secondary entrance from Brookes Street is also step free access. The development proposal includes lowering the internal ground level to allow an internal floor level flush with street level to allow step free access into the main front entrance of the building. The proposed development would meet the highest practicable standards of accessible and inclusive design as required by Policy C6 of the Local Plan and therefore would accord with the development plan in this regard.

14. SUSTAINABILITY AND ENERGY

- 14.1 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.

- 14.2 In line with London Plan Policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan 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

- 14.3 The proposed development involves the reuse and refurbishment of the existing building however it does still include substantial demolition of the facades and floorplates.
- 14.4 The proposal would include demolition of all external facades and most of the floorplates, retaining existing reinforced concrete frame and basement structures, refurbishment and reconfiguration of the existing office (Use Class E) building for continued office use including extensions. The applicants have confirmed that 87% of the structure will be retained and the façade replacement will enable an increase in the efficiency of the building envelope.
- 14.5 A Circular Economy statement has been provided including a pre-demolition audit which makes recommendations to maximise the reclamation of materials. The Statement adopts the targets reuse, recycling, or recover 95% of demolition waste and 100% of construction waste, and put 100% of excavation waste to beneficial use. A post-construction evaluation of this target would be secured by condition (condition 25).

- 14.6 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.

- 14.7 To ensure resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use (condition 40).

Whole Life Carbon

- 14.8 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building’s life.
- 14.9 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).
- 14.10 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are “regulated emissions” and so are considered separately and in detail in relation to the zero-carbon target (see the “Energy and carbon reductions” section below).
- 14.11 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).
- 14.12 Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again at the end of its life (when it decomposes), so it is included in the total A-C-Modules.
- 14.13 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square metre of gross internal area in kilograms of carbon equivalent (kgCO₂e/m² GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The table below shows how the development performs against the benchmarks, as well as the aspirational targets. Targets for office use types have been used.

Modules	Min benchmark for OFFICE (kgCO ₂ e/m ² GIA)	Aspirational Benchmark for OFFICE (kgCO ₂ e/m ² GIA)	Proposal (kgCO ₂ e/m ² GIA)
A1-A5	<950	<600	403
B-C (excl B6 & B7)	<450	<370	547

Total A-C (ex B6&B7 inc sequestration)	<1400	<970	863
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Table 11 - Summary of Whole-Life Carbon results for the office development

14.14 The development is required to provide a Whole Life Carbon assessment, as there is significant demolition. An assessment has been provided and considered. In this case, the development meets the aspirational benchmarks for A1-A5 largely due to retention and refurbishment of large parts of the building, use of CLT rather than composite concrete slab, 20% recycled content steel and general use of a refrigerant with a low global warming potential. However it does not meet the benchmark for modules B and C for in use and end of use stages for as shown in Table 6 above. This is primarily due to the anticipated carbon impact associated with the replacement and maintenance of building services, internal finishes with shorter lifespans, and the end-of-life treatment of some materials. While the structure performs well because of the retention-led approach, the operational components and finishes have less scope for carbon saving at this stage. Overall, the development still performs within the aspirational benchmarks. There remains realistic potential to reduce emissions in Modules B-C through detailed design, specification of longer-life materials and services, and adoption of circular economy principles to minimise waste and enable reuse. Opportunities should therefore be considered to reduce the emissions in modules B and C and report improvements post construction. Condition 25 is attached to ensure a post construction assessment of WLC is completed and provided for monitoring and compliance.

Energy and carbon reductions

14.15 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). After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon for the new build areas.

Energy and carbon summary

14.16 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%	7%
Be green stage (renewables): CLP policy CC1	20%	7%

Total carbon reduction: LP policy SI2 and LP CC1	35%	13.5%
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Table 12 - Carbon saving targets (for majors) and the new build extension element of the scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	N/A	32.9%
Be green stage (renewables): CLP policy CC1	20%	7%
Total carbon reduction: LP policy SI2 and LP CC1	N/A	37.6%

Table 13 - Carbon saving targets (for majors) and the refurbishment scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	N/A	25%
Be green stage (renewables): CLP policy CC1	20%	7%
Total carbon reduction: LP policy SI2 and LP CC1	N/A	30.2%

Table 14 - Carbon saving targets (for majors) and the site wide scheme results

- 14.17 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.

Total carbon reductions

- 14.18 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.
- 14.19 This is charged at £95/tonne CO₂/yr (over a 30-year period) which is 30 tonnes x £95 x 30 years = £85,500. This amount will be spent on delivery of carbon reduction measures in the borough.
- 14.20 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHP) for non-residential developments.
- 14.21 In this case, the development does not meet the policy target of 35% reductions for the new extension with only a 13.5% reduction and achieving an overall on-site reduction of 30.2% improvement on Part L requirements as shown in Table 9 above. The overall site reductions are improved by the

37.6% reduction from the refurbished elements of the development. The carbon offset of £85,500 will be secured by Section 106 legal agreement to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 14.22 London Plan policy SI 2 sets a policy target of at least a 15% reduction through reduced energy demand at the first stage of the energy hierarchy for non-residential schemes.
- 14.23 In this case, the development does not meet the policy target of 15%, and reduces emissions by 7% at this stage through energy efficient design. The proposals involve curtain walling which is more efficient (U-value of 1.25 W/(m²K) than the Building Regulations limiting values require (at least 1.6 the same as a window) but is not as efficient as a wall would be (at least 0.26 W/(m²K)). All new walls are proposed to be 0.22 W/(m²K), glazing is efficient at a maximum of 1.0W/(m²K), floors meet the building regulation requirements with 0.18 W/(m²K) except the retained basement slab which is assumed to be 0.35 W/(m²K). An air permeability target of 0.4m³/m².hr is significantly better than the requirement of 0.8. The proposal includes LED lighting and high efficiency MVHR throughout and cooling is through reversible heat pumps.
- 14.24 Consideration should be given at the next design stage to any additional opportunities to reduce the carbon impact of the building in operation through additional consideration of energy efficiency. A condition would be attached to require a feasibility study with the aim of maximising energy efficiency measures (condition 7).

Be clean stage (decentralised energy supply)

- 14.25 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.
- 14.26 In this case a preliminary assessment of the existing London heat map has been made using the measurement tool along shortest route via roads. The CPG guidance refers to the identification of heat networks using a 500m radius which identified the site is within 500m radius of an existing network and in a Herat Network Priority Area. The applicant consulted with Eon, the nearest heat network operator, and confirmed that the proposed development is situated a significant distance to the west of the existing network. Following a review of site specific constraints including existing infrastructure and utility services along Farringdon Street, as well as the presence of an underground river, the applicant concluded that a connection to the heat network is not viable.
- 14.27 The development proposes a future connection in the double height space between basement 2 and basement 1 levels. However, details of the

safeguarded routes from the site boundary to the future location of heat exchanger equipment (facilitating connection to the building heating system) have not been included. Following discussions with the applicant this has been submitted in a updated basement plan to show the location of the future plant space provision for the district heat network. Given its location, futureproofing connection details to a district heat network shall be secured through the S106 legal agreement.

Be green stage (renewables)

- 14.28 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.
- 14.29 In this case, the development does not meet the policy target of 20%, reducing emissions by 7% at this stage through renewables. The proposal includes 120 photovoltaic (PV) panels on the roof of the building providing 32kWp. Full details including the installation of a meter to monitor the energy output shall be secured by condition 18, alongside the requirement to carry out a feasibility assessment with the aim of maximising the provision of PV panels. The proposal also includes low carbon heating from Air Source Heat Pumps (ASHPs) which are located within the roof level plant enclosure.

Be seen (energy monitoring)

- 14.30 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 proposals include a building management system and sub metering and the applicant has committed to reporting energy consumption in line with policy.
- 14.31 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

- 14.32 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. The BREEAM overall base case score is 81.85% which would meet the requirement for BREEAM Excellent. The pre assessment achieves 78% for energy and 89% for water which exceeds the 60% requirement and 84% for materials which exceeds the 40% requirement. The overall targets and credits for energy, water and materials shall be secured by s106 legal agreement.
- 14.33 London Plan Policy SI 4 requires major development proposals to demonstrate how they will reduce the potential for overheating and reliance on air conditioning systems (active cooling) in accordance with the cooling hierarchy.
- 14.34 A range of measures have been adopted in the building fabric and services design proposals to reduce the cooling demand. These include installing

energy efficient equipment, high performance glazing and new insulated roofs, air source heat pumps and mechanical ventilation incorporating heat recovery. Despite these measures, active cooling is still proposed in order to keep internal temperatures within acceptable limits, although the incorporation of passive measures will help to ensure that the demand for active cooling is lowered. External shading to the windows on the southern and eastern elevations has been suggested to help mitigate potential overheating. In order to demonstrate the feasibility of incorporating further combined passive and active cooling measures where necessary, and to ensure the proposed measures are achievable a condition would be attached requiring the submission of a detailed overheating assessment, supported by dynamic thermal modelling (condition 5).

- 14.35 Information on the efficiency of ASHPs has not been submitted. High efficiency ASHPs should be selected for the proposed development, which may help improve the be green figures, reduce overall energy demands, limit the potential impact to the environment with a lowering global warming potential refrigerant. Details of this system will be secured by condition condition 17).
- 14.36 The development plan (Local Plan Policy CC3 and London Plan 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.
- 14.37 In this case, the development incorporates green / blue roofs at levels 8 and roof level and Sustainable Urban Drainage Systems (SUDS) to reduce the amount of rainwater discharged to the public sewer during a rainfall event. The total areas of green roof equal 682 sq. m and the blue roofs have a storage of 166.5 m³ reducing the runoff to a total of 24.2 l/s in a 1 in 100 year plus climate change rainfall event. The green / blue roofs would be integrated with the solar panels, which would enhance the biodiversity of the site and reduce water runoff. Details of this system and evidence of its implementation will be secured by condition 10. Flood risk is covered in the 'Flood risk and drainage' section of this report.

Energy and sustainability conclusion

- 14.38 The proposal adopts a comprehensive approach to sustainable design, retaining approximately 87% of the existing structure and achieving Whole Life Carbon performance largely within the aspirational benchmark range, mainly due to material reuse, low-carbon construction methods and efficient building systems. While the assessment shows that the proposal meets the aspirational targets for modules A1–A5, the in-use and end-of-life stages (modules B and C) perform less well. However, the secured condition requiring a post-construction Whole Life Carbon review will ensure that opportunities to reduce emissions in these stages are explored and reported. The scheme will target BREEAM 'Excellent' and incorporates green and blue roofs which will enhance biodiversity, improve water management and contribute to climate resilience.

14.39 While the development falls short of London Plan and Camden Local Plan targets for on-site carbon reduction at the Be Lean and Be Green stages, a full carbon-offset payment of £85,500 will be secured through a Section 106 agreement to achieve net-zero carbon. Additional conditions will require further assessment of energy efficiency and overheating mitigation. On balance, the proposal represents an improvement over the existing building and aligns with the objectives of the Camden Climate Action Plan 2020–2025 to achieve a net zero carbon borough by 2030.

15. AIR QUALITY

15.1 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.

15.2 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.

Impact on occupants

15.3 The proposals are located in an area of poor air quality, where the annual mean NO₂ concentrations were monitored as 49.64µg/m³ in the most recent reporting year of 2023 which is significantly over the national annual mean objective of 40 µg/m³.

15.4 As the site is for commercial use, the proposed use is therefore generally considered suitable; however, the exposure of people who work at the site would need to be considered further. Any air inlets for the ventilation system must also be located as close to the roof level as possible and away from any busy roads and emission sources to minimise exposure. The applicant has confirmed that air inlets would be located at roof level and to the rear of the site to avoid air intakes near polluted areas of Gray's Inn Road. Full details of the mechanical ventilation system including air inlet locations and any necessary filtration and a maintenance programme shall therefore be secured by condition (condition 13).

Impacts on local air quality

15.5 The energy strategy for the proposed development is all-electric utilising Air Source Heat Pumps (ASHPs), a zero emission technology and a communal low temperature heating system which will not add to the air pollution in the area. As the development is also car-free, it is considered Air Quality neutral.

15.6 However, a diesel generator is also proposed for emergency back-up use only which will be tested for maintenance purposes for fewer than 18 hours per year. Given the poor air quality at the site, full details of the diesel generator shall be secured by condition (condition 14).

15.7 The dust risk categories have been determined for each of the construction activities. The assessment has determined that the potential effects of dust

emissions associated with the construction phase of the proposed development is 'high risk' at the worst affected receptors. As such, at least 4 air quality monitors are required to be put in place, more than 3 months before construction to record the baseline and background emission levels. Mitigation measures based on the findings of the report shall be submitted to and approved by the Local Planning Authority. These would be secured by condition (condition 3)

- 15.8 A condition is also attached to ensure that All Non-Road Mobile Machinery (NRMM) used on the site shall include CESAR Emissions Compliance Verification (ECV) identification (condition 37).

Construction impacts

- 15.9 The impacts of demolition and construction work on dust soiling and ambient fine particulate matter concentrations have been assessed and the construction dust risk is currently considered medium risk and as such at least 2 real time dust monitors and appropriate mitigation is required.
- 15.10 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. An informative will be added to the decision notice to remind the applicant of this.

16. FLOOD RISK AND DRAINAGE

- 16.1 The development plan (Local Plan policy CC3 and London Plan policies SI12 and SI13) seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Local Plan Policy CC3 expects major developments to:
- Achieve greenfield run-off rates wherever feasible and as a minimum, 50% reduction in run off rates.
 - To include Sustainable Urban Drainage Systems (SuDS), unless demonstrated to be inappropriate.
 - To follow the drainage hierarchy in policy SI 13 of the London Plan.
 - Major developments will be required to constrain runoff volumes for a 1 in 100 year, 6 hour rainfall event, where feasible.
- 16.2 The site is not within a Local Flood Risk Zone; it is within Flood Zone 1 (where there is a 0.1% annual probability of flooding). It is within a critical drainage area (CDA), located within an area susceptible to groundwater flooding and is in an area with a Secondary A aquifer.
- 16.3 The development would include sustainable drainage systems at roof level in the form of 4 blue roofs and vegetated areas to minimise water run-off. Blue roof A (90.2 m³), Blue roof B (43.1 sq. m), Blue roof C (5.1 m³) and Blue roof D (28.1 m³) with a total storage capacity of 166.5 m³. An attenuation tank with a storage capacity of 50.4m³ would also help with

rainwater storage. The proposed runoff rates from Brooke Street to the east is 10.3 l/s while the proposed runoff rate from Gray's Inn Road to the west is 13.9 l/s. This would reduce total runoff from the site to 24.2l/s. The measures proposed above would represent an improvement in the on-site drainage of 83% against the existing surface water runoff rate from the site. Further maintenance details would be required. These details would be secured by condition (condition 10).

- 16.4 The measures proposed above would represent an improvement in the on-site drainage of 83% against the existing surface water runoff rate from the site.
- 16.5 A Flood Risk Assessment has been submitted in support of the proposal. The proposal includes reducing the ground floor slabs fronting Gray's Inn Road to provide level access. The drainage design suggests redirecting overflows away from buildings and vulnerable areas, reducing risks to people and property. However, there remains a potential concern that insufficient capacity in the surface water drainage network could result in exceedance or overflow being conveyed into the development site. Thames Water is expected to confirm surface water capacity following the approval of the proposed drainage strategy. As such, a condition is recommended to secure the necessary details (condition 10).
- 16.6 In the event that there would be surface water exceedance and overflow from above-ground drainage that could impact pedestrian or vehicular access and emergency escape routes within the development, a Flood Risk Emergency Plan in accordance with ADEPT/Environment Agency's Flood Risk Emergency Plans for New Development (2019) will also be required and shall be secured by condition (condition 9).
- 16.7 The site is located in an area with a Secondary A aquifer. If piled foundation works are required as part of the proposed works, a Foundation Works Risk Assessment (FWRA) should be submitted and should be undertaken in accordance with the Environment Agency Guidance 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention' Report number NC/99/73 (2001). The applicant has confirmed that a full FWRA would be carried out by the piling contractor prior to the installation of any new piled foundations. A condition would be attached to secure this (condition 8).
- 16.8 The proposed development is located within 15m of a strategic sewer. Thames Water has advised that a piling method statement should be submitted to ensure that any piling would not impact or cause failure of local underground sewerage utility infrastructure. A condition would be attached to secure this (condition 8).

17. REFUSE AND RECYCLING

- 17.1 Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance (Design) are relevant with regards to waste and recycling storage and seek

to ensure that appropriate storage for waste and recyclables is provided in all developments.

17.2 An Operational Waste Management Strategy has been submitted with the application prepared by Waterman Infrastructure and Environment Limited. Waste stores are proposed at ground floor level fronting Brooke Street. The following waste storage would be provided within the bin store:

- Commercial waste:
 - 13 x 1280L Eurobin for general waste
 - 2 x 240L wheeled bin for glass waste
 - General waste compactor

17.3 Deliveries and servicing currently take place via Brooke Street, and the development is proposed to be serviced from a new loading bay on-site which can be accessed from Brooke Street.

17.4 An Operational Waste Management Strategy has been prepared that would be adopted by the site's facilities management once in operation. The strategy sets out various measures confirming that the facilities management team will be responsible for overseeing waste storage arrangements, tenant awareness and regular reviews to monitor progress and identify future improvements in recycling. The proposed waste storage and strategy are reasonable for a development of this size and sufficient internal space has been provided to accommodate the storage facility. Full details of the waste management strategy shall be secured as part of a Delivery and Servicing Plan secured by S106 legal agreement which would need to be agreed by the Council's Principal Environmental Services Officer, and the provision and retention of the refuse and recycling store shall be secured by condition (condition 23). An additional condition would also prevent refuse and recycling bins being left on the public highway. (condition 42).

17.5 The detailed delivery and servicing plan secured by S106 legal agreement and the refuse and recycling conditions would help to ensure that any operational impacts associated with delivery and servicing will be mitigated.

18. LANDSCAPING, TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

18.1 The landscaping, public realm and trees considerations are as follows:

- Policy review
- Designations
- Landscaping and public realm
- Biodiversity Net Gain and Biodiversity
- Trees
- Conclusion

Policy review

- 18.2 Camden Local Plan policy A3 (Biodiversity) and Camden CPG Biodiversity deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation. This approach is supported by London Plan policy G5 which uses Urban Greening Factor (UGF) targets to evaluate the quality and quantity of urban greening. The policy applies a target of 0.4 for mainly residential schemes, and 0.3 for mainly commercial schemes.
- 18.3 The site itself includes 8 individual trees within the existing courtyard area. There are three street trees on the highway to the front of the site along Gray's Inn Road and three trees on land within Brookes Court Estate to the northeast of the site. On the site itself (not the highway) the proposals include a range of green infrastructure including extensive green roofs and new trees that would be located on the new roof terraces as part of the overall landscaping proposal.
- 18.4 The proposals will entail the removal of the 8 trees (T1 to T8 (inclusive)), all of which are Category C trees (low quality, 10yrs life) to facilitate development to the northern part of the site. The 8 trees to be removed are all the same non-native species and offer little ecological provision. The trees share relative uniformity in size and age, and are growing in raised planters which will restrict their ultimate potential size. The trees are of minimal visibility from the public realm due to the high brick walls that surround this part of the site and are not considered to significantly contribute to the character or appearance of the conservation area. The loss of amenity and canopy cover can be mitigated through replacement planting. Outline details of a high quality landscaping scheme at different levels across the building have been provided including proposed planting of approximately 30 new trees. The Council's Tree officer has reviewed the information and is satisfied with the details subject to conditions to secure the landscaping details (condition 16).
- 18.5 The London Plan uses the UGF scores to help objectively evaluate the quality and quantity of urban greening. Given this is a commercial-led scheme, the 0.3 value is an appropriate target. The proposals achieve an UGF of 0.307, modestly exceeding the target, with the highest individual contributions coming from the extensive green roofs.
- 18.6 The final measures for appropriate greening and biodiversity would be secured by condition (condition 15) which requires details of the green roof, roof terraces as well as the other greening and landscaping measures. It also requires details of species and density along with maintenance details. This will ensure inclusion of greening like night-scented herbs which can attract insects, in turn supporting a foraging environment for other wildlife such as bats.
- 18.7 An initial inspection of Fox Court was undertaken for roosting bats however the building has recently been occupied and is in generally good condition

with no features seen that could accommodate roosting bats. The submitted report shows that there was no potential for other protected species or habitats on the site. The proposed biodiversity enhancement plan includes bird, bat, bug hotels and insect houses on each terrace and at roof level on the green roof. Condition 19 would require details of bird and bat boxes and bug and insect houses.

- 18.8 Overall, the on-site measures are considered acceptable and in accordance with the objectives of the development plan.

Open spaces - Brookes Market and Baldwin's Gardens

- 18.9 As discussed in the Amenity section of this report, the proposed development would result in a reduction in sunlight within Baldwin's Gardens communal amenity space in March. This established area provides important green infrastructure and visual relief for local residents living in the surrounding social housing, and also contains a number of mature trees that contribute ecological and visual value to the setting. While the reduction in sunlight is acknowledged, it is limited to March and improves significantly from April to June, when between 86% and 99% of the space would receive at least two hours of direct sunlight. The area would therefore continue to function as a usable outdoor amenity space. To help mitigate the temporary overshadowing impact and support ongoing biodiversity enhancement, a financial contribution of £71,750 towards landscaping improvements and ecological planting within Baldwin's Gardens would be secured via a Section 106 legal agreement. This would assist in improving species diversity and increasing the overall biodiversity value of the space.

- 18.10 There would also be a notable reduction in sunlight within Brookes Market as a result of the cumulative effects of this proposal and the approved 2 Waterhouse Square development immediately to the south of the open space. However, while this represents a measurable change in daylight and sunlight conditions, it would not have a material impact in ecological terms. Brookes Market is designated as public open space but has a largely transient, hard-surfaced character with no lawns, planting beds or seating areas, following the removal of benches in 2019 due to anti-social behaviour. The area generally suffers from ecological deficiency, although the ten mature deciduous trees surrounding the space provide some local biodiversity value. The proposal would not adversely affect these trees or their ecological contribution.

- 18.11 It is considered appropriate to secure a financial contribution of £30,750 via a s106 legal agreement towards local public realm or landscape improvements within Brookes Market. Future opportunities for ecological enhancement could be explored through any future public realm improvements that have been identified as a priority in the Holborn Vision. A financial contribution towards improvements to Brookes Market would be secured by s106 legal agreement.

Overall impact

- 18.12 Given the above, considering the schemes individually and cumulatively,

there would be a minor impact but the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan overall. Taking the above into account, the proposals would result in a moderate but localised reduction in sunlight to Baldwin's Gardens and a minor change to conditions within Brookes Market. However, the financial contribution towards landscaping and ecological enhancements would help to mitigate these impacts. When considered individually and cumulatively, the resulting effect on nature conservation, landscape and biodiversity value is assessed as minor overall and therefore acceptable in accordance with the development plan

Statutory Biodiversity Net Gain

- 18.13 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 18.14 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.
- 18.15 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.
- 18.16 The application was submitted on 4 December 2023, prior to the statutory requirement for a mandatory 10% biodiversity net gain coming into effect on 1 January 2024. As such, the proposals are not required to meet the statutory 10% BNG target under the Environment Act 2021. Nevertheless, Camden's local planning policies, including Policy A3 of the Camden Local Plan which encourage opportunities to enhance biodiversity are considered to have been met as discussed above.

19. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 19.1 The proposed development would generate increased employment opportunities during the construction phase as it provides an uplift of more than 1,000sqm and over £3million in construction costs. To ensure local people benefit from these opportunities in line with Local Plan Policy E1, discussions have already commenced between the Council's Inclusive Economy Team and 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 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). Based on the total build costs the number of construction apprentices would be 31 apprentices and the support fee would be £52,700.

- **Construction Work Experience Placements** - the applicant should provide 16 construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development construction. This is based on a net uplift of 8,314 sqm office space, with one placement required per 500sqm. 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, and two 'meet the buyer' events for local SMEs. This sets a target of 10% of the total value of the construction contract. The Inclusive Economy team will liaise and assist with the developer to provide details of local suppliers and subcontractors.

End Use / Occupation phase opportunities

19.2 Policy E2 of the Local Plan also encourages end uses to support employment opportunities through apprenticeships and training placements. This applies to major commercial developments which will result in a net increase of 1,000sqm (GIA) or more of employment space including office, hotel and leisure developments.

19.3 The Council's Inclusive Economy Team has suggested a package of measures they would like to see secured which the applicant has agreed to in full:

- To secure a specific number of end use apprenticeships through s106 legal agreement. There will be an expectation of at least 3 on a rolling term for 5 years for the future occupiers of the employment space, which can also include the café. Apprenticeships will be recruited via Camden's Inclusive Economy Service;
- To secure a specific number of work experience opportunities in the occupation phase of the development;
- The developer and future office occupiers including the jewellery space should also confirm their commitment to ensuring the site offers local employment benefits in the long term by:
 - Working with Camden Learning/STEAM on school engagement if applicable
 - Joining the Council's Inclusive Business Network and promoting this and good employment practice.
 - Working with the council to deliver work experience

placements.

- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally
- The Open Exhibition and Gallery Spaces on the ground and basement (when not being used by business or the jewellery occupiers) can also be utilised by local residents or local community should they need to host events on weekdays, evenings and weekends. This can include arts/culture or meetings. This should be free or at a peppercorn cost.

19.4 Section 73 provides for a s106 contribution to be used by the Inclusive Economy service to support employment and training activities and local procurement initiatives. This approach is supported through policy E2 of the Local Plan and applies to major commercial developments which will result in a net increase of 1,000sqm (GIA) or more of employment space. There is an uplift of floor space of 8,314 sq. m.

19.5 This contribution would be calculated as follows:

- Net increase in floor space (sqm GIA) / 12sqm [space requirement per full time employee] = full time jobs created Full time jobs created x 21% [% of Camden residents who work in Camden] x 35% [% of employees requiring training] x £3,995 [£ per employee requiring training).
- Net increase in floor space 8,314 sqm / 12sqm [space requirement per full time employee] = 693 full time jobs created
- Full time jobs created 693 x 21% [% of Camden residents who work in Camden] = 145 jobs for Camden Residents
- 145 x 35% [% of employees requiring training] = 51 employees who need training
- 51 x £3,995 [£ per employee requiring training] = £203,745.00 employment and training contribution.

19.6 The above measures are considered a significant benefit of the proposals and would be included in a package of Employment and Training measures secured by s106 agreement in accordance with Local Plan Policy E1 and the CPG.

20. SAFETY AND SECURITY

20.1 Policy C5 of the Local Plan seeks to make the borough a safer place by working with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviours. Developments are required to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime including Holborn and Covent Garden where the site is located. Appropriate security and community safety measures are required, and development should promote safer streets and public areas. Fearing crime or the chances of being a victim of crime vary notably across age, gender, and race (protected characteristics under the Public Sector Equality Duty), and these discrepancies mean that

if the environment is not perceived as a safe public space for all users, certain groups are likely to be excluded or suffer greater impact, contrary therefore not only to CLP policy C5 but also CLP policy C6 which aims to secure access for all.

- 20.2 The Metropolitan's Design Out Crime Officer (DOCO) reviewed the proposed development and originally raised concerns about the undercroft area outside the main entrance onto Gray's Inn Road and the potential to create higher levels of anti-social behaviour. Through design changes made during the application process the upper floors of the building have been set back in line with the ground floor removing any undercroft area. The DOCO has raised no other objections to the proposal but has made comments and recommendations from a crime and safety perspective.
- 20.3 A condition would be attached to the planning permission to ensure that the development achieves 'Secure by Design' certification and that it is undertaken accordingly (condition 26).

21. CONTAMINATED LAND

- 21.1 Historically, the site was occupied by a range of buildings by 1875 mapping, including a public house. The majority of the building in the east were replaced by a single building on the site between 1896 and 1916, with land uses on site by 1922 listed as the Prudential Approved Societies and Great International Plate Glass Insurance and Cleaning Company. Additional historical land uses on / in the vicinity of the site included a number of retail and commercial uses. These buildings were later demolished and the existing building was constructed on site by 1979 - 1980.
- 21.2 A Contamination Risk Management – Preliminary Risk Assessment report prepared by GEA has been submitted in support of the application. The report summarises a previous desk study and site investigation which was undertaken in 2013.
- 21.3 Ground conditions comprised Hackney Gravel over the London Clay over the Lambeth Group, proved to 25.7m. Localised limited made ground was reported, comprising reworked natural soils with brick. A sample of the made ground material recorded no unacceptable concentrations of contaminants of concern.
- 21.4 There was considered to be a low risk of contamination linkages on site, noting the existing double basement would have removed the majority of made ground and no elevated concentrations of contaminants of concern were reports by a previous site investigation.
- 21.5 The report has been reviewed by the Council's Contaminated Land Officer who has confirmed the report's conclusions are considered appropriate, with no unacceptable risks anticipated to the end users, noting the continued commercial use of the site, and with the site being covered by the existing structure, underlain by the basement and no soft landscaping is understood to be proposed other than in raised planters (hence no viable exposure

pathways are anticipated).

- 21.6 It is recommended that a watching brief is conducted during construction / demolition works in the event that any unexpected contamination is encountered during the development which shall be secured by condition should planning permission be granted (condition 36).

22. FIRE SAFETY

- 22.1 Policy D12 (Fire safety) of the London Plan requires all major development proposals to be submitted with a Fire Statement. London Plan Policy D5 (Inclusive Design) also requires schemes to incorporate safe and dignified emergency evacuation and suitable fire safe strategies. The application has been supported by a Fire Statement which includes details of the fire strategy including means of escape.
- 22.2 A Fire Statement has been prepared by a qualified fire consultant.
- 22.3 The key fire safety objective of satisfying the Building Regulations performance requirements has been demonstrated. The fire safety guidance documents used have been identified as BS 9999:2017. The existing reinforced concrete frame and basement structures of the building would be retained with a steel and mass timber hybrid structure with exposed CLT floor slabs for the newly extended floor areas. The materials would have a reaction to fire rating of B-s3, figure wd2 or better.
- 22.4 The information has been reviewed by the Council's Building Control team. Compliance with the statement is secured by condition (condition 44).

23. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 23.1 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.
- 23.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of £1,538,090.00.
- 23.3 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. The estimated Camden CIL liability is £914,540.00.

24. CONCLUSION

- 24.1 The proposal would provide a significant increase in office floorspace with a significant increase in jobs on the site. The proposals would deliver modern, flexible and accessible offices which would be a great improvement on the existing accommodation, and bring a vacant building back into use. Alongside this to support SMEs and to ensure local people benefit from the scheme it includes affordable workspace and a package of employment and

training measures. The proposed ground floor café use would help to contribute to the vitality of the area.

24.2 Officers accept in this case that on-site housing is not feasible and consider that the proposed financial contribution towards housing is acceptable. Given the viability challenges it is accepted that full PIL is not possible. The funding would support the delivery of affordable homes in the locality.

24.3 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and clear and convincing justification for the harm is required. The applicant has sought to avoid and mitigate harm as far as possible. The scheme having evolved from an earlier proposal where the top floor was wider and heavier in terms of its materiality. However, less than substantial harm has been identified and considerable weight and importance must be given to that harm. There are a number of public benefits that outweigh the harm, and as such, the proposal remains in accordance with the development plan as a whole. The public benefits of the scheme include:

- Removal of parts of the buildings of low architectural quality and the provision of an improved quality of architecture in its place.
- Enhancement of local townscape character through high quality materials that respond to the surrounding streetscape.
- Improved public realm along Gray's Inn Road with additional seating and amenity space.
- Active ground floor frontage along Gray's Inn Road and Brooke Street creating a more engaging street environment.
- Increased pavement width of Gray's Inn Road improving pedestrian comfort and safety.
- Introduction of planted roof and green terraces providing biodiversity benefits and visual relief.
- Landscaping improvements to local communal amenity spaces and open spaces.
- Transport package including micro-mobility improvements.
- Employment and training packing including apprenticeships, local recruitment, and local procurement.

24.4 The proposed development would not materially impact on amenity in terms of overlooking or noise. With regards to loss of daylight and sunlight, there would be some impacts but most would be commensurate with the local context and the nature of Central London as it continues to support growth and effective use of land. However, there are some major adverse impacts, notably to 2 living spaces in no. 33 Brooke Street. With regards to these properties the impacts are significant and considered to be in conflict with policy A1 which seeks to protect the amenity of communities and neighbours. While there is no national policy flexibility for commercial developments equivalent to that set out in paragraph 130 of the NPPF for housing, the impacts have been carefully assessed against BRE guidance and local context. Taking this into account, and considering the benefits of the scheme

(listed in full above and below), officers consider that on balance the impact on light is acceptable and in compliance with the development plan as a whole.

24.5 Likewise, there would be a notable impact from the development in terms of overshadowing of Baldwins Gardens communal amenity space and Brookes Market open space with less than 50% of the area seeing at least 2 hours of direct sunlight on 21st March, contrary to BRE guidance. However, when looking at the impacts across April to July, it can be seen that the space achieves BRE compliance with the sunlight levels rising significantly through April, May and June. Considering UK growing seasons, the greatest impacts would be over the winter when many plants are dormant. Nevertheless, there may be impacts on some vegetation and it is therefore considered necessary to secure a contribution of £102,500 to mitigate these impacts and allow for any adaptation and replanting to the community amenity space in Baldwins Gardens and to secure public realm improvements in Brookes Market to ensure there would not be a major adverse impact on the quality of the spaces and their value to the local community. With the suggested mitigation secured, the proposal would comply with the development plan in this regards.

24.6 The proposals include energy-efficient measures. 87% of the existing building (by weight) would be retained on-site. The proposals improve the existing building through a retention-focused approach, minimising carbon impact and maximising reuse. The proposals are acceptable in sustainability and energy terms.

24.7 The proposal is acceptable in transport terms subject to conditions and section 106 obligations.

24.8 Officers are of the view that the employment, architectural benefits of the proposal are substantial. The contribution towards affordable housing in the area is also considered a significant benefit. Given the above, on balance, the proposals are considered acceptable.

25. RECOMMENDATION

25.1 Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement with the following heads of terms:

Affordable housing:

- Payment in lieu of affordable housing of £3,000,000

Affordable workspace:

- Affordable workspace – 1,011 sq. m at 20% discount for equivalent maker space in the area for 10 years
- Affordable workspace marketing plan

Operational management plan (office roof terraces):

Transport:

- Travel Plan and associated monitoring and measures contribution of £11,348.
- Contribution of £2,700 for off-site provision of 9 short stay Sheffield stands
- Car-free development and removal of 26 on-site car parking
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- CA-C CPZ review contribution of £30,000.
- Construction management plan (CMP), and CMP implementation support contribution of £30,513 and CMP Impact Bond of £32,000.
- Construction working group consisting of representatives from the local community.
- Delivery and Servicing Plan.
- Highway works contribution of £50,000.
- Pedestrian, Cycling and Environmental Improvements contribution £620,000.
- Micro and shared mobility improvements contribution of £10,000.

Energy and Sustainability Plan, to include:

- Carbon offset contribution of £85,500
- Sustainability measures indicating BREEAM Excellent
- Further investigations to maximise BREEAM credits
- Future proofing details to a District Heating Network

Enhancements to communal amenity space and public realm contributions:

- Brooke Street Market Improvements to public realm contribution £30,750 and Baldwin Gardens community amenity space contribution of £71,750 (£102,500 in total)

Employment and Training Package including (full details set out in Employment and Training section):

- 31 construction apprentices and a support fee of £52,700
- 16 construction work placement opportunities
- Local recruitment
- Local procurement
- End user apprenticeships (at least 3 on a rolling term of 5 years)
- Work experience opportunities in the occupation phase of the development
- Use of open exhibition and gallery spaces on the ground and basement floors (when not in use by businesses/ jewellery occupiers) by local residents or local community at free or peppercorn cost
- Employment and training measures
- Employment and training contribution £203,745

Architect retention

26. LEGAL COMMENTS

26.1 Members are referred to the note from the Legal Division at the start of the

Agenda.

27. CONDITIONS

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:

1195-BGY-XXX-XXXX-DR-A-04010 rev A; 1195-BGY-XXX-XXXX-DR-A-04011 rev A; 1195-BGY-XXX-098B-DR-A-04098 rev A; 1195-BGY-XXX-099B-DR-A-04099 rev A; 1195-BGY-XXX-100L-DR-A-04100 rev A; 1195-BGY-XXX-101L-DR-A-04101 rev A; 1195-BGY-XXX-102L-DR-A-04102 rev A; 1195-BGY-XXX-103L-DR-A-04103 rev A; 1195-BGY-XXX-104L-DR-A-04104 rev A; 1195-BGY-XXX-105L-DR-A-04105 rev A; 1195-BGY-XXX-106L-DR-A-04106 rev A; 1195-BGY-XXX-107L-DR-A-04107 rev A; 1195-BGY-XXX-108L-DR-A-04108 rev A; 1195-BGY-XXX-109L-DR-A-04109 rev A; 1195-BGY-XXX-120S-DR-A-04120 rev A; 1195-BGY-XXX-125S-DR-A-04125 rev A; 1195-BGY-XXX-124S-DR-A-01204 rev A; 1195-BGY-XXX-127S-DR-A-01207 rev A; 1195-BGY-XXX-300E-DR-A-04130 rev A; 1195-BGY-XXX-300E-DR-A-04131 rev A; 1195-BGY-XXX-300E-DR-A-04132 rev A; 1195-BGY-XXX-300E-DR-A-04133 rev A; 1195-BGY-ZZZ-208S-DR-A-01208 rev A.

Demolition Drawings: 1195-BGY-XXX-098B-DR-A-04198 rev A; 1195-BGY-XXX-099B-DR-A-04199 rev A; 1195-BGY-XXX-100L-DR-A-04200 rev A; 1195-BGY-XXX-101L-DR-A-04201 rev A; 1195-BGY-XXX-102L-DR-A-04202; 1195-BGY-XXX-103L-DR-A-04203 rev A; 1195-BGY-XXX-104L-DR-A-04204 rev A; 1195-BGY-XXX-105L-DR-A-04205 rev A; 1195-BGY-XXX-106L-DR-A-04206 rev A; 1195-BGY-XXX-107L-DR-A-04207 rev A; 1195-BGY-XXX-108L-DR-A-04208 rev A; 1195-BGY-XXX-109L-DR-A-04209 rev A; 1195-BGY-XXX-230E-DR-A-04230 rev A; 1195-BGY-XXX-231E-DR-A-04231 rev A; 1195-BGY-XXX-231E-DR-A-04232 rev A; 1195-BGY-XXX-231E-DR-A-04233 rev A.

Proposed Drawings:

1195-BGY-XXX-098B-DR-A-04298 rev A; 1195-BGY-XXX-099B-DR-A-04299 rev A; 1195-BGY-XXX-100L-DR-A-04300 rev B; 1195-BGY-XXX-101L-DR-A-04301 rev B; 1195-BGY-XXX-102L-DR-A-04302 rev B; 1195-BGY-XXX-103L-DR-A-04303 rev B; 1195-BGY-XXX-104L-DR-A-04304 rev B; 1195-BGY-XXX-105L-DR-A-04305 rev B; 1195-BGY-XXX-106L-DR-A-04306 rev B; 1195-BGY-XXX-107L-DR-A-04307 rev B; 1195-BGY-XXX-108L-DR-A-04308 rev B; 1195-BGY-XXX-109L-DR-A-04309 rev B; 1195-BGY-XXX-320S-DR-A-04320 rev B; 1195-BGY-XXX-325S-DR-A-04325 rev A; 1195-BGY-ZZZ-XXXX-DR-A-20204 rev A; 1195-BGY-XXX-330E-DR-A-04330 rev B; 1195-BGY-XXX-331E-DR-A-04331 rev B; 1195-BGY-XXX-332E-DR-A-04332 rev B; 1195-BGY-XXX-333E-DR-A-04333 rev B; 1195-BGY-XXX-334E-DR-A-04334 rev A; 1195-BGY-XXX-335E-DR-A-04335 rev A; 1195-BGY-XXX-336E-DR-A-04336 rev A; 1195-BGY-XXX-337E-DR-A-04337 rev A; 7267-MTT-ZZ-B1-SK-MEP-2000 rev P1; FCP667-AL-SK-025; 1195-BGY-ZZZ-XXXX-DR-A-20207 rev A; WIE-19467-SA-0006-P02 rev P02; 1195-BGY-ZZZ-208S-DR-A-20208 rev A.

Documents:

Financial Viability Assessment prepared by DS2 dated 28/08/2025; Heritage, Townscape and Visual Impact Assessment Addendum prepared by The Townscape

Consultancy dated August 2025; Design and Access Statement Addendum prepared by Buckley Gray Yeoman dated 20/07/2025; Landscape Design Statement prepared by Grant Associates dated October 2023; Tree Survey Report prepared by Tetra Tech dated August 2025; Arboricultural Impact Assessment prepared by Tetra Tech Limited dated August 2025; Archaeological Desk-based Assessment prepared by Hawk Heritage dated October 2023; Operational Waste Management Strategy prepared by Waterman Infrastructure and Environmental Limited dated November 2023; Preliminary Contamination Risk Assessment rev 2 prepared by GEA dated October 2023; Environmental Noise Survey and Noise Impact Assessment Report prepared by Quantum Acoustics dated October 2023; Planning Fire Statement prepared by The Fire Surgery dated July 2025; Statement of Community Involvement prepared by Lowick dated November 2023; Bat Survey Report prepared by Aven Ecology dated October 2023; Biodiversity Report and Ecological Management Plan prepared by Aven Ecology dated October 2023; Biodiversity Report and Ecological Management Plan Addendum prepared by Aven Ecology dated July 2025; Preliminary Ecological Appraisal prepared by Aven Ecology dated October 2023; The Biodiversity Metric 4.0 – Calculation Tool; Flood Risk Assessment prepared by Elliott Wood dated 31/07/2025; Circular Economy Statement prepared by Sustainable Building Services Solutions dated July 2025; Whole Life-Cycle Carbon Report prepared by Sustainable Building Services Solutions dated July 2025; Energy and Sustainability Statement prepared by Sustainable Building Services Solutions dated July 2025; Daylight and Sunlight Statement prepared by Point 2 dated October 2023; Daylight and Sunlight Statement prepared by Point 2 dated August 2025; Daylight and Sunlight Technical Note prepared by Point 2; Overshadowing Studies prepared by Point 2 dated October 2025; Air Quality Assessment Revision A prepared by Create Consulting Engineers Ltd dated October 2023; Transport Assessment Addendum prepared by Waterman Infrastructure & Environment Ltd dated October 2025; Delivery and Servicing Plan prepared by Waterman Infrastructure & Environment Ltd dated November 2023; Framework Travel Plan prepared by Waterman Infrastructure & Environment Ltd dated November 2023; Drainage Strategy prepared by Elliott Wood dated 31/07/2025; Preliminary Contaminated Risk Assessment prepared by GEA dated October 2023; Employment, Training and Regeneration Statement prepared by General Projects and AND London dated November 2023; Access Statement prepared by David Bonnett Associates dated November 2023.

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

Pre-start conditions (any works)

3 Air Quality Monitoring

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

- a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;
- b) A confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details; and
- c) Prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.

The monitors shall be retained and maintained on site in the locations agreed with

the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.

Reason: In order to manage and mitigate the impact of the development on the air quality and dust emissions in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policies A1, A4 and CC4 of the Camden Local Plan 2017 and policy SI1 of the London Plan 2021.

4 Noise limits for plant

Prior to commencement of the development, details shall be submitted to and approved in writing by the Council, of the external noise level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/ equipment will be lower than the lowest existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014+A1:2019 "Methods for rating and assessing industrial and commercial sound at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. A post installation noise assessment shall be carried out where required to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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.

Pre-start conditions (other than demolition)

5 Overheating assessment

Prior to the commencement of development (other than demolition) a detailed overheating assessment incorporating dynamic thermal modelling (DTM) shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall demonstrate:

- a) how the development applies the cooling hierarchy to minimise the risk of overheating, including passive design measures
- b) identify any remaining risk of overheating after all feasible mitigation measures have been applied; and
- c) set out measures to mitigate any residual risk and how they will be incorporated into the design.

The approved measures shall be implemented prior to first occupation of the development and shall be retained thereafter.

Reason: To ensure the development minimizes the risk of overheating and applies the cooling hierarchy in accordance with Policy CC2 of the London Borough of Camden Local Plan 2017.

6 Foundation Works Risk Assessment

Prior to commencement of works (other than demolition), a Foundation Works Risk Assessment (FWRA) demonstrating that risks to groundwater are minimised shall be submitted to and approved in writing by the local planning authority. Systems shall be implemented and thereafter retained and maintained in accordance with the approved details.

Reason: To ensure that the development avoids harm to the water environment in accordance with Policy CC3 of the London Borough of Camden Local Plan 2017.

7 Maximising energy efficiency

Prior to commencement of development (other than demolition), a feasibility assessment to consider potential improved energy efficiency measures, with the aim of maximising energy efficiency and as a minimum not increasing carbon emissions at Be Lean over the Baseline unless clearly justified, 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 reduces carbon dioxide emissions in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.

8 Piling Method Statement

No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: To safeguard existing below ground public utility infrastructure and controlled waters in accordance with the requirements of Policy CC3 (Water and flooding) of the London Borough of Camden Local Plan 2017.

9 Flood risk emergency plan

Prior to commencement of development (other than demolition), a Flood Risk Emergency Plan should be prepared in accordance with the aims and objectives of the ADEPT/Environment Agency Flood Risk Emergency Plans for New Development guidance and submitted to the Local Planning Authority and approved in writing.

Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

10 SuDS: Further details

Prior to commencement of development (other than demolition), full details of the sustainable drainage system including not less than 50.4m³ attenuation from an attenuation tank, 166.5 m³ of blue roof capacity and from tree pits plus 682m² total of green roof areas shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to the runoff rate of 24.2l/s approved by the Local Planning Authority. An up to date Flood Risk Assessment, drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including:

- The proposed SuDS or drainage measures including storage capacities
- The proposed surface water discharge rates or volumes
- Exceedance flows

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

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

11 SuDS further details exceedance flows

Prior to commencement of development (other than demolition), further details are required to show that, so far as is reasonably practicable, flows resulting from rainfall in excess of a 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property. The submission shall include:

- a) Confirmation from Thames Water regarding surface water drainage capacity;
- b) An assessment of potential exceedance and overflow risks, including interaction with existing surface water flood risk as identified by the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping;
- c) Identification of any impacts on emergency escape routes, pedestrian or vehicular access.

Where such risks are identified, a Flood Risk Emergency Plan (FREP) shall be prepared and submitted, demonstrating compliance with the aims and objectives of the ADEPT/Environment Agency guidance Flood Risk Emergency Plans for New Development (2019), and confirming that safe access and egress can be maintained during flood conditions.

Details shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to reduce as much exceedance flows offsite by allowing retention of surface water within the site. The system shall be implemented and thereafter retained and maintained in accordance with the approved details.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021; and to protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan.

12 Green roof details

Prior to commencement of above-ground development full details of all biodiverse, substrate-based living roofs to be incorporated into the development shall be submitted to and approved in writing by the local planning authority. The design and planting scheme should reflect the local conditions and species of interest. The details shall include the following:

- A. detailed maintenance plan;
- B. details of its construction and the materials used;
- C. a section at a scale of 1:20 showing substrate depth averaging 130mm with added peaks and troughs to provide variations between 80mm and 150mm; and
- D. full planting details including species showing planting of at least 16 plugs per m².

The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the premises are first occupied. Guidance on living roofs is available in the Camden Biodiversity Action Plan: Advice Note on Living Roofs and Walls.

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

13 Mechanical Ventilation with NO2 and Particulate Filtration

Prior to commencement of development (other than demolition), full details of the mechanical ventilation system including:

- a) air inlet locations. Air inlet locations should be located away from busy roads and any other emission sources and as close to roof level as possible, to protect internal air quality.
- b) the development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.

14 Diesel back up generator

Prior to commencement of above ground works (excluding demolition and any site preparation works) details of the proposed Emergency Diesel Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered, and testing minimised.

The flue/exhaust from the generator should be located away from air inlet locations. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.

The generator and associated flue/ exhaust 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: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017.

15 Details of green infrastructure

Prior to commencement of above ground works, full details of the green infrastructure and planting across the site, including living roofs and walls, shall be submitted to and approved in writing by the local planning authority. The details shall include:

- a) a detailed scheme of maintenance incorporating a management plan;
- b) sections at a scale of 1:20 showing substrate depth averaging 130mm with added peaks and troughs to provide variations between 80mm and 150mm; with manufacturers details demonstrating the construction and materials used; and
- c) full details of planting species and density promoting insects and invertebrates to achieve a minimum Urban Greening Factor (UGF) of 0.3.

The green infrastructure 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: 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.

16 Landscaping details

Prior to commencement of above-ground development (excluding demolition and any site preparation works), full details of hard and soft landscaping (including 30 replacement trees) and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. Such details shall include details of any proposed earthworks including grading, mounding and other changes in ground levels. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

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

17 Air source heat pump (ASHP) details

Prior to commencement of above ground works (excluding demolition and any site preparation works), details, drawings and data sheets showing the location, SCOP of at least 3.4 unless fully 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 metering details including estimated costs to occupants and commitment to monitor performance of the system post construction. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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.

18 Maximising solar PV and evidence of installation

Prior to commencement of above ground works (excluding demolition and any site preparation works), a feasibility assessment with the aim of maximising the provision of solar photovoltaics should be submitted to the local planning authority and approved in writing. The proposals should include as a minimum the approved 120 PV panels (682sq. m) at roof level and predicted energy generation of photovoltaic cells of at least 32kWp from the PV arrays.

The details shall include energy generation capacity and associated equipment installed on the building, as well as details of the maintenance programme and the installation of a meter to monitor the energy output from the approved renewable energy systems.

The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

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

19 Bird and bat boxes

Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of bird and bat boxes, insect boxes and bug hotels shall be submitted to and approved in writing by the Local Planning Authority. These should be incorporated into the fabric of the building where feasible.

The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter permanently retained.

Reason: To secure appropriate design features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of policy D1 and A3 of the Camden Local Plan 2017.

Prior to occupation or use

20 Cycle parking

Prior to first occupation of the building, the following long stay bicycle parking shall be provided in its entirety:

- Secure and covered parking for 394 bicycles for the office use.

All such facilities shall thereafter be permanently maintained and retained.

Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Policies T1 and T2 of the London Borough of Camden Local Plan 2017.

21 Disabled parking

Prior to occupation of the development, one disabled parking space for the commercial use hereby approved shall be provided in its entirety and shall be permanently maintained and retained thereafter.

Reason: To ensure the development provides adequate spaces designated for disabled people in accordance with T2 of the Camden Local Plan 2017.

22 Freight consolidation

Prior to the occupation of the development, a Freight Consolidation Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall include:

- a) details of how deliveries to the site will be managed and consolidated through a recognised freight consolidation centre;
- b) evidence of engagement with an appropriate consolidation operator (such as the Camden–Islington Consolidation Centre or other London-based equivalent);
- c) measures to demonstrate how the strategy will achieve at least a 50% reduction in the number of individual delivery trips to the site compared with a typical baseline for a development of this nature; and
- d) arrangements for monitoring and reporting delivery activity to the Local Planning Authority for a minimum period of three years following first occupation.

The approved Freight Consolidation Strategy shall be implemented prior to first occupation of the development and shall thereafter be maintained and operated for the lifetime of the development unless otherwise agreed in writing by the Local Planning Authority.

Reason: To minimise the number of vehicle trips associated with the development, reduce congestion and emissions, and promote sustainable freight movements in accordance with London Plan Policy T7 and Camden Local Plan Policy T1.

23 Waste and refuse storage

The refuse and recycling facility as approved shall be provided prior to the first occupation of the building and permanently retained thereafter and shall be managed in accordance with the Operation Waste Management Strategy prepared

by Waterman dated November 2023.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.

24 SuDS: Evidence of installation

Prior to occupation, evidence that the SuDS system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

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

25 Whole Life Carbon – post construction assessment

Prior to the occupation of the development:

a) the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance, and

b) confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with policies CC1, CC2, CC3, and CC4 of the London Borough of Camden Local Plan and policies SI1, SI2, SI3, SI4, SI5 and SI7 of the London Plan 2021.

26 Secure by design accreditation

Prior to any occupation of the development, a Certificate of compliance with 'Secure by Design' shall be submitted to and approved in writing by the Local Planning Authority. The development shall be permanently retained and maintained in accordance with Secure by Design accreditation thereafter.

Reason: To ensure the development takes reasonable measures to make the borough a safer place in accordance with Policy C5 of the London Borough of Camden Local Plan 2017.

27 Roof terraces (screening details)

Prior to occupation of the development the details of the roof terrace screening at first and second floor levels, including the planted buffer zones, shall be submitted to and approved in writing by the local planning authority. The screens shall be built in accordance with the approved details and retained throughout the use of the development, unless otherwise agreed in writing by the local planning authority.

Reason: In order to prevent unreasonable overlooking of neighbouring premises in accordance with policy A1 of the Camden Local Plan 2017.

28 Operational Waste Management Plan

The development hereby approved shall be carried out in accordance with the approved Operational Waste Management Strategy prepared by Waterman

Infrastructure and Environment Ltd dated November 2023, unless otherwise agreed in writing by the Local Planning Authority. The approved waste management measures shall be implemented prior to the occupation of the development and thereafter retained and maintained for the lifetime of the development.

Reason: To ensure appropriate arrangements for the storage, handling and collection of waste and recycling are in place, to promote sustainable waste management practices and safeguard the amenity of the area, in accordance with Policy CC5 of the Camden Local Plan (2017).

29 Hard and soft landscaping

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

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

Prior to relevant part of the works

30 Detailed design drawings and samples

Notwithstanding the details shown on the approved plans, prior to commencement of above ground works (excluding demolition and any site preparation works), detailed drawings, specifications 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 sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors and canopies/ pagodas
- b. Plan, elevation and section drawings of all ground floor facades including planters at a scale of 1:10
- c. Typical plan, elevation and section drawings of balustrading to terraces and balconies
- d. Details of cladding and façade treatment / louvres to any mechanical plant or machinery enclosures at roof level
- e. Details drawings including plans, coloured elevations and sections of all external materials and finishes including all brickwork, stone, terrazzo;
- f. Details of the of bricks with a reflective (white) finish
- g. A schedule identifying all windows and openings where integrated retractable awnings are proposed, together with detailed drawings of the awnings at a scale of 1:20, showing their construction, operation, and integration with the surrounding façade;
- h. 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).
- i. A sample panel (1m by 1m) of the facing brickwork (including white brickwork) demonstrating the proposed colour, texture, face-bond and pointing to be provided on site
- j. A full scale sample panel of one whole bay of the front elevation to be provided on site for review to include a typical window with all neighboring

materials and details

k. Details of the external lighting strategy, including detailed drawings of light fittings, their locations and luminance levels.

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 Camden Local Plan 2017.

Compliance conditions

31 Roof terraces

No flat roofs within the development shall be used as terraces, unless they are marked as such on the approved plans.

Reason: To ensure that the amenity of occupiers of residential properties in the area is not adversely affected by noise and disturbance in accordance with the requirements of policies G1, A1, A4 and TC2 of the Camden Local Plan.

32 Amplified music from roof terraces

No amplified music shall be played on the outdoor terraces associated with the development hereby approved.

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

33 Hours of use of roof terraces

The roof terraces hereby approved at 1st to 8th floor levels shall be used by the office (E(c)(i)) users of the building only and shall not be used outside the hours of 08:00 and 21:00 Monday to Friday and at no time during the Bank Holidays or weekends.

Reason: In order to safeguard the amenity of neighbouring premises from noise and general disturbance in accordance with the requirements of policy A1 Camden Local Plan 2017.

34 Obscure glazing

The first to fifth floor windows on the southern side elevation of the development hereby approved shall be obscure glazed to an internal floor level of 1.7m and shall be retained and maintained as such thereafter.

Reason: In order to safeguard the amenity of neighbouring premises from noise and general disturbance in accordance with the requirements of policy A1 Camden Local Plan 2017.

35 Roof terraces (installation of screening)

The second and third floor roof terraces hereby approved shall not be used or accessed until the privacy screen details have been fully installed. The approved privacy screens shall thereafter be retained for the duration of the development.

Reason: In order to prevent unreasonable overlooking of neighbouring premises in accordance with policy A1 of the Camden Local Plan 2017.

36 Land contamination

If during construction/demolition works, evidence of potential contamination is encountered, works shall cease and the site shall be fully assessed to enable an

appropriate remediation plan to be developed. Works shall not recommence until an appropriate remediation scheme has been submitted to, and approved in writing by the local planning authority and the remediation has been completed.

Upon completion of the building works, this condition shall not be discharged until a closure report has been submitted to, and approved in writing by the local planning authority.

Reason: To protect future occupiers of the development from the possible presence of contamination in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.

37 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.

38 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 Camden Local Plan 2017.

39 Deliveries and servicing hours

No deliveries or collections/ loading and unloading shall occur at the development site other than between the hours of 08:00 to 20:00.

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

40 Reuse and recycling of 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.

41 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.

42 Delivery and refuse items

All refuse and recycling bins, delivery cages, trolleys and any other items linked to deliveries and collection in association with the development hereby permitted are to be stored within the buildings and only brought out onto the public highway when deliveries are being made or refuse collected and returned to within the building immediately thereafter.

Reason: In the interests of visual amenity and to prevent obstruction and inconvenience to users of the public highways, in accordance with policies A1, CC5 and T1 of the Camden Local Plan 2017.

43 External doors

All external doorways, except for fire doors or for access to utilities, should not open outwards towards the public highway/footway/courtyard spaces. The proposed doors must either open inwards or have a sliding door so they do not restrict the flow of pedestrians or risk being opened onto those passing by.

Reason: In order to enhance the free flow of pedestrian movement and promote highway safety and amenity in accordance with policies D1 and T1 of the Camden Local Plan 2017.

44 Fire Statement

The development shall be constructed in accordance with, and at all times occupied and managed in strict compliance with, the approved Planning Fire Statement (doc ref: 231002DN02F1 dated 16/10/2023).

Reason: In order to provide a safe and secure development in accordance with Policies D5 and D12 of the London Plan 2021.

28. INFORMATIVES

1. Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020- 7974 6941). 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.
2. Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing

Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.

3. 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)

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

4. This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
5. 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.
6. 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.
7. The Foundation Works Risk Assessment (FWRA) must have regard to current available guidance including the Environment Agency's guidance 'Piling in layered ground: risks to groundwater and archaeology', and 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention' (National Groundwater and Contaminated Land Centre report NC/99/73).
8. 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.
9. A licence in accordance with Section 177 of the Highways Act 1980 must be obtained from Camden's Structures Manager (Engineering Services) prior to the construction of any part of the building which would project over a highway maintainable at the public expense. This is necessary to ensure the safety of road users, especially pedestrians.
10. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without 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 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

11. There are water mains crossing or close to the application site development. Thames Water do NOT permit the building over or construction within 3m of water mains. If planning significant works near Thames Water mains (within 3m) Thames Water will need to check that the development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services provided in any other way. The applicant is advised to read the TW guide working near or diverting our pipes.

12. 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.

13. Biodiversity Net Gain (BNG) Informative (1/2):

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

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

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

Based on the information provided, this permission WILL NOT require approval of a BGP before development is begun because the application was submitted before BNG became mandatory on 12/02/2024.

14. Biodiversity Net Gain (BNG) Informative (2/2):

+ Irreplaceable habitat:

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

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

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

++ Phased development

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

APPENDIX A – BPS Viability audit report

Fox Court, 14 Gray's Inn Rd, London WC1X 8HN

Independent Viability Review

Prepared on behalf of the London
Borough of Camden

13th October 2025

Planning Reference: 2023/5130/P



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1.0 Introduction

- 1.1 BPS Chartered Surveyors have been instructed by the London Borough of Camden ('the Council') to undertake a review of a Financial Viability Assessment ('FVA') prepared by DS2 on behalf of Clare Real Estate ('the Applicant') in connection with a planning application for the redevelopment of the above site.
- 1.2 The site currently comprises a 1970s office building that extends to 153,784 sq ft GIA over seven upper floors plus ground and basement levels. The Site is partially occupied, and basement parking spaces are rented separately.
- 1.3 The site is situated in central London, by Chancery Lane station. The area is predominantly mixed in nature, with a range of office, retail and residential buildings nearby. The building is not in a conservation area, nor is it listed.
- 1.4 The proposals are for:

'Demolition of existing facades, retaining existing reinforced concrete frame and basement structures; refurbishment and reconfiguration of the existing office (Use Class E) building for continued office use including extensions with new facades to the west elevation fronting Grays Inn Road (9 storeys), to the northern courtyard elevation facing Brookes Court (9 storeys), to the existing 5 storey north-east wing fronting Brook Street (3 storeys) and to the south elevation (8 storeys); external alterations, provision of rooftop amenity terraces, landscaping and associated works'
- 1.5 We have previously advised the Council in connection with pre-application advice related to the subject site, as well as earlier iterations of this application. In our most recent assessment dated 10th December 2024, we agreed with DS2 that the scheme was generating a deficit of c. -£14.4m for a 100% commercial and -£21m for the mixed-use scheme. On this basis, we concluded that the scheme was unable to contribute towards affordable housing.
- 1.6 We understand that this FVA has been submitted in relation to a change in the proposed plans, with an overall reduction in the scheme's NIA. We also understand that the current iteration of the scheme now envisages the provision of c.12,249 sq ft NIA of affordable office accommodation, which was not tested in our earlier assessments. The proposed areas are summarised in the table below:

Input	BPS' Dec 2024 report	Current assessment
OMS Office NIA	165,721 sq ft (15,395 sqm)	151,211 sq ft (14,047 sqm)
Affordable Office NIA	-	12,249 sq ft (1,138 sqm)
Office GIA	246,128 sq ft (22,866 sqm)	243,275 sq ft (22,601 sqm)

- 1.7 The basis of our review is the Financial Viability Assessment prepared by DS2, dated 28th August 2025, which concludes that the scheme currently shows a deficit of approximately - £35.5m and, therefore, no additional affordable contribution can viably be offered. It is our understanding that the Applicant is willing to provide a contribution of £3m, regardless of the viability position.
- 1.8 We have downloaded the documents available on the Council's planning website.
- 1.9 We have received a live version of the Argus appraisals included in the report.
- 1.10 We have assessed the cost and value inputs within the financial appraisal in order to determine whether the scheme can viably make any affordable housing contributions.
- 1.11 We have searched the Council's planning website and have not identified any other recent or outstanding planning applications relating to the site.
- 1.12 A Land Registry search shows that the applicant does currently own the property. The property was purchased in 2015 for £70,000,000.
- 1.13 The advice set out in this report is provided in the context of negotiating planning obligations and therefore in accordance with PS1 of the RICS Valuation – Global Standards 2025, the provisions of VPS1–6 are not of mandatory application. Accordingly, this report should not be relied upon as a Red Book Valuation. The Valuation Date for this Viability Review is the date of this report, as stated on the title page. This Viability Review has been undertaken in accordance with the Terms & Conditions provided to the Council and with any associated Letters of Engagement and should only be viewed by those parties that have been authorised to do so by the Council.
- 1.14 This Viability Review adheres to the RICS Professional Statement on Financial Viability in Planning (published May 2019). In accordance with this Statement, we refer you to our standard terms and conditions which incorporate details of our Quality Standards Control & Statement on Limitation of Liability/ Publication.

2.0 Summary Table

2.1 Our analysis presents the following outturn financial position for the project:

Input	DS2 (Nov 2023)	BPS (Dec 2024)	DS2 (Aug 2025)	BPS (Oct 2025)	Comments
Income					
OMS Commercial	£213,145,236 (£1,286psf/ £13,833psm)	£213,145,236 (£1,286psf/ £13,833psm)	£170,487,599 (£1,127psf/ £12,136psm)	£187,173,775 (£1,238psf/ £13,323psm)	Disagreed
Affordable Workspace	-	-	£7,054,105 (£576psf/ £6,199psm)	£7,582,131 (£619psf/ £6,663psm)	Disagreed
Expenditure					
Benchmark Land Value	£45,075,000	£45,075,000	£39,298,326	£39,298,326	Agreed
Build Cost (exc. Contingency)	£90,597,826	£90,597,826	£91,969,756	£91,969,756	Agreed
Neighbourly Matters	-	-	£1,672,778	-	Ambiguous – No evidence provided
Contingency	5%	5%	5%	5%	Agreed
Professional Fees	10%	10%	10%	10%	Agreed
Commercial Sales Agent & Legal Fees	1.5%	1.5%	1.5%	1.5%	Agreed
Commercial Marketing	-	-	£2.50psf	-	Disagreed
Letting Agent Fee	10%	10%	12%	10%	Disagreed
Letting Legal Fees	5%	5%	5%	5%	Agreed
AH PIL	-	-	£3,000,000	£3,000,000	Agreed
CIL	£2,160,338	£2,160,338	£2,893,018	£2,893,018	Ambiguous – We require confirmation from the Council on this input.
S106	£354,360	£354,360	£288,745	£288,745	Ambiguous – We require confirmation from the Council on this input.
Finance	7.5%	7.5%	7.5%	7.5%	Agreed
Profit Commercial	15%	15%	15%	15% (Private) 6% (Affordable)	Disagreed- We consider lower profit assumption for the affordable workspace element should be adopted.
Development Timeframes					
Pre-construction Period	6-months	6-months	6-months	6-months	Agreed

Construction Period (100% commercial)	19-months	19-months	30- months	19-months	Disagreed
Letting Period	6-months	6-months	6-months	6-months	Agreed
Sales Period	1-month	1-month	1-month	1-month	Agreed
Viability Position (100% commercial)	-£14.4m	-£14m	-£35.5m	-£19.4m	Disagreed

3.0 FVA Checklist

- 3.1 On the 30/09/2025 we sent DS2 a request to provide the following information to assist with our review of the FVA. The table below summarises the documentation received at the date of this submission.

Existing Site	
Land ownership plan	Downloaded.
Measurements of the Existing Site / Buildings	Received.
Floor plans	Downloaded.
Detailed Description of the existing site	Downloaded. (previously inspected)
A schedule of condition	Outline provided.
External Photographs of the Existing Site / Buildings	Current ones not provided (previously inspected).
Internal Photographs of the Existing Site / Buildings	Current ones not provided (previously inspected).
Copies of the existing or recent leases referred to in the FVA	Partially provided.
Current Tenancy Schedule	Outline provided
Recent transactional evidence to support their BLV assumptions	Downloaded.
Modelling used to generate values (Residential/ Commercial)	Downloaded.
Proposed Development	
Application plans	Downloaded.
Accommodation schedule	Downloaded.
Measurements for the proposed scheme (GIA/ NIA)	Downloaded.
Design and Access statement	Downloaded.
Planning Statement	Downloaded (2023 version only).
Detailed design specification	Not provided
Recent transactional evidence to support their GDV assumptions	Downloaded.
Modelling used to generate values (Residential/ Commercial)	Downloaded.
Construction	
A detailed cost plan	Downloaded.
Development programme	Outline provided
Appraisals	
Copy of the live Argus appraisals	Received.

4.0 Conclusions And Recommendations

- 4.1 We have reviewed the Financial Viability Assessment prepared by DS2 on behalf of the Applicant, which concludes that the proposed scheme generates a residual value of £3.7m, which is approximately £35.5m below their benchmark land value of £39.3m. On this basis, the scheme cannot provide any additional affordable contribution.
- 4.2 Decision makers should apply considerable caution to affordable offers which are not underpinned by the outcome of a viability assessment supporting the affordable housing offer proposed. We are aware of a wide number of schemes where Section 73 applications have been submitted shortly after the grant of planning consent, where viability arguments have been used to substantially reduce or remove previously offered affordable housing. We are not suggesting that such an eventuality would occur in relation to this scheme, but simply alert decision makers to this widespread practice. Ultimately, the relevant safeguard to this contingency is for any affordable offer to be fully supported by an agreed viability position. In the absence of such a safeguard, appropriate weight should only be provided to the current affordable housing offer when considering the planning balance.

Benchmark Land Value

- 4.3 DS2 have approached the Benchmark Land Value on an Existing Use Value (EUV) basis. They suggested three approaches in arriving at an assessment of the Benchmark Land Value.
- 4.4 We have reviewed their assumptions and supporting evidence and outlined our review in Section 6 of this report. We have suggested amendments in approach, as well as inputs adopted.
- 4.5 Overall, we consider DS2's adopted Benchmark Land Value to be broadly reasonable.

Development Value

- 4.6 The scheme includes 151,211 sq ft (14,048 sqm) NIA open market and 12,249sq ft (1,138 sqm) NIA affordable commercial space.
- 4.7 We have reviewed the information provided by DS2 in support of their open market GDV, and we have also undertaken our own research into recent transactions in the local area. We are of the view that the value proposed is below current market expectations. We have suggested some changes, which are outlined in Section 7 of this report. Overall, our suggested revisions result in an increase of approximately £16.7m on the open market GDV proposed by DS2, which reflects an increase of 9.7%.

- 4.8 We have assessed the value of the affordable component at 50% of our increased market value, in line with Camden's Affordable Workspace Strategy requirements. Our assessment reflects an increase of c. £0.5m in the affordable GDV.

Ground rents

- 4.9 The Leasehold Reform (Ground Rent) Act 2022 is now in full force. We therefore consider the omission of capitalised ground rents as a reasonable assumption.

Development Costs

- 4.10 Our Cost Consultant, Neil Powling, has analysed the build cost plan for the proposed scheme prepared by Third London Wall ('TLW'), dated 29th July 2025, and concludes that:

"Our benchmarking results in an adjusted benchmark of £4,242/m² that compares to the Applicant's £4,171/m². We therefore consider the Applicant's costs to be reasonable."

- 4.11 DS2 adopt an additional neighbourly matters allowance of £1,672,778. Given that no evidence has been provided, we have excluded this from our appraisal. We reserve the right to revisit our assessment pending evidence being provided.
- 4.12 Generally, we consider that combined sales agent, marketing and legal fees should not exceed 1.5%. We also found 12% letting agent fee to be excessive and consider 10% to be more appropriate. We have adjusted these allowances in our appraisal.
- 4.13 We consider that a lower profit target would apply to the affordable workspace element. We have assumed 6% on the affordable and 15% (on GDV) on the open market commercial components of the scheme.

Recommendations

- 4.14 We have been provided with a live version of the Argus appraisal included in DS2's report, to which we have applied our amendments. These amendments are outlined in the table included in Section 2, and our revised appraisal is in Appendix 6.
- 4.15 After these changes, we identify a deficit of **-£19.4m**. On this basis, we calculate that the scheme would not be able to contribute towards or provide additional affordable contributions.
- 4.16 We have undertaken sensitivity analysis to test the impact of changes to the construction costs and annual rent on the scheme's viability. We find that an 8% decrease in costs and an 8% increase in rental income erodes the current deficit. We include our sensitivity analysis as follows:

Annual Rent	Construction: Gross Cost				
	-8.000%	-4.000%	0.000%	4.000%	8.000%
-8.000%	-£21,747,140	-£26,216,153	-£30,685,166	-£35,154,179	-£39,623,192
-4.000%	-£16,088,677	-£20,557,690	-£25,026,703	-£29,495,716	-£33,964,729
0.000%	-£10,430,213	-£14,899,226	-£19,368,239	-£23,837,252	-£28,306,266
4.000%	-£4,771,750	-£9,240,763	-£13,709,776	-£18,178,789	-£22,647,802
8.000%	£886,713	-£3,582,300	-£8,051,313	-£12,520,326	-£16,989,339

- 4.17 In the absence of agreement of the viability position, should the application proceed to committee, we strongly recommend that any approval be subject to the adoption of our viability figures for review purposes.
- 4.18 We recommend that if a policy compliant offer is not made, the scheme should be subject to pre-implementation and late stage reviews of viability in order that the viability can be assessed over the lifetime of the development.

5.0 Principles Of Viability Assessment

- 5.1 Development appraisals work to derive a residual value. This approach can be represented by the formula below:

$$\begin{aligned} &\text{Gross Development Value} - \text{Development Costs (including Developer's Profit)} \\ &= \text{Residual Value} \end{aligned}$$

- 5.2 The residual value is then compared to a benchmark land value. Existing Use Value (EUV) and Alternative Use Value (AUV) are standard recognised approaches for establishing a land value as they help highlight the apparent differences between the values of the site without the benefit of the consent sought.
- 5.3 The rationale for comparing the scheme residual value with an appropriate benchmark is to identify whether it can generate sufficient money to pay a realistic price for the land whilst providing a normal level of profit for the developer. In the event that the scheme shows a deficit when compared to the benchmark figure the scheme is said to be in deficit and as such would be unlikely to proceed.
- 5.4 Development appraisals can also be constructed to include a fixed land value and fixed profit targets. If an appropriate benchmark is included as a fixed land value within a development appraisal this allows for interest to be more accurately calculated on the Benchmark Land Value, rather than on the output residual value. By including fixed profit targets as a cost within the appraisal, programmed to the end of development so as not to attract interest payments, the output represents a 'super' profit. This is the profit above target levels generated by the scheme which represents the surplus available towards planning obligations.
- 5.5 This Viability Review report adheres to the RICS Professional Statement on Financial Viability in Planning: Conduct and Reporting (published May 2019). In accordance with this Statement, Section 8 below incorporates details of our Quality Standards Control & Statement on Limitation of Liability/ Publication. This report has been prepared according to the Professional Statement's requirement for objectivity and impartiality, without interference and with reference to all appropriate available sources of information. Where information has not been obtainable, we have stated this expressly in the body of the report.

6.0 Benchmark Land Value

Viability Benchmarking

6.1 Planning Policy Guidance, published May 2019, states:

Benchmark land value should:

- *be based on existing use value*
- *allow for a premium to landowners (including equity resulting from those building their own homes)*
- *reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees and*

Viability assessments should be undertaken using benchmark land values derived in accordance with this guidance. Existing use value should be informed by market evidence of current uses, costs and values. Market evidence can also be used as a cross-check of benchmark land value but should not be used in place of benchmark land value. There may be a divergence between benchmark land values and market evidence; and plan makers should be aware that this could be due to different assumptions and methodologies used by individual developers, site promoters and landowners.

The evidence should be based on developments which are fully compliant with emerging or up to date plan policies, including affordable housing requirements at the relevant levels set out in the plan. Where this evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic benchmark land values of non-policy compliant developments are not used to inflate values over time.

[...] Where viability assessment is used to inform decision making under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan. Local authorities can request data on the price paid for land (or the price expected to be paid through an option agreement).

6.2 The NPPF recognises the need to provide both landowners and developers with a competitive return. In relation to landowners this is to encourage landowners to release land for development. This is set out in PPG as follows:

To define land value for any viability assessment, a benchmark land value should be established on the basis of existing use value (EUV) of the land, plus a premium for the

landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The Premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements. Landowners and site purchasers should consider policy requirements when agreeing land transactions. This approach is often called 'existing use value plus' (EUV+).

6.3 The RICS Guidance Note 'Assessing viability in planning under the National Planning Policy Framework 2019 for England', published March 2021, supports the NPPG's definition of Benchmark Land Value.

6.4 NPPG further defines EUV as follows:

Existing use value (EUV) is the first component of calculating benchmark land value. EUV is the value of the land in its existing use. Existing use value is not the price paid and should disregard hope value. Existing use values will vary depending on the type of site and development types. EUV can be established in collaboration between plan makers, developers and landowners by assessing the value of the specific site or type of site using published sources of information such as agricultural or industrial land values, or if appropriate capitalised rental levels at an appropriate yield (excluding any hope value for development).

6.5 The Mayor of London's Affordable Housing and Viability SPG published August 2017 states a clear preference for using EUV as a basis for benchmarking development as this clearly defines the uplift in value generated by the consent sought. This is evidenced through the following extract:

The Mayor considers that the 'Existing Use Value plus' (EUV) approach is usually the most appropriate approach for planning purposes. It can be used to address the need to ensure that development is sustainable in terms of the NPPF and Development Plan requirements, and in most circumstances the Mayor will expect this approach to be used.

6.6 Guidance indicates that the sale of any premium should reflect the circumstances of the landowner. We are of the view that where sites represent an ongoing liability to a landowner and the only means of either ending this liability or maximising site value is through securing a planning consent this should be a relevant factor when considering whether a premium is applicable. This view is corroborated in the Mayor of London's Affordable Housing and Viability SPG which states:

Premiums above EUV should be justified, reflecting the circumstances of the site. For a site which does not meet the requirements of the landowner or creates ongoing liabilities/ costs, a

lower premium of no premium would be expected compared with a site occupied by profit-making businesses that require relocation. The premium could be 10 per cent to 30 per cent, but this must reflect site specific circumstances and will vary.

- 6.7 While EUV is the primary approach to defining BLV, in some circumstances an Alternative Use Value approach can be adopted. This is the value of the land for a use other than its existing use. NPPG outlines:

If applying alternative uses when establishing benchmark land value these should be limited to those uses which would fully comply with up to date development plan policies, including any policy requirements for contributions towards affordable housing at the relevant levels set out in the plan.

[...] Plan makers can set out in which circumstances alternative uses can be used. This might include if there is evidence that the alternative use would fully comply with up to date development plan policies, if it can be demonstrated that the alternative use could be implemented on the site in question, if it can be demonstrated there is market demand for that use, and if there is an explanation as to why the alternative use has not been pursued.

- 6.8 The RICS Guidance Note 'Assessing viability in planning under the National Planning Policy Framework 2019 for England', published March 2021, supports the definition of AUV from NPPG and reiterates that any AUV must reflect relevant policy requirements.
- 6.9 When adopting an AUV approach, the premium to the landowner is implicit and therefore an additional landowner premium should not be added as this would be double counting.
- 6.10 NPPG and RICS guidance are clear that if refurbishment or redevelopment is necessary to realise an existing use value then this falls under the AUV provision of NPPG and no landowner premium should be added.

Existing Site

- 6.11 The existing site comprises a 103,823 sq ft (9,645 sqm) NIA, which equates to 153,784 sq ft (14,287 sqm) GIA, 1970s office building. It comprises seven upper floors plus the ground and basement. The reception is located on the ground floor level, whilst the basement is occupied by storage and a 27-space car park.
- 6.12 We note that in their assessment, DS2 refer to a slightly lower NIA than previously assessed (102,400 sq ft). We consider the discrepancy between their previous and current figures should be clarified, although we accept the overall difference to be marginal. We have relied on the previous measurements in our assessment.

- 6.13 We previously visited the property on the 12th of October 2023. During the inspection, we found the property to be in variable condition. Some floors appeared to be freshly fitted out (let to a serviced office provider), whilst others appeared somewhat dated.
- 6.14 The property features four pipe fan coil air conditioning, raised floors, a mix of suspended ceilings and exposed ceilings on different levels, double-glazed windows, a lift and male and female WC on every floor. Communal seating and outdoor space is available at the rear of the building.
- 6.15 We have not received any recent photos of the existing building. For the purposes of this assessment, we assume the condition of the building remains unchanged since our last inspection, although we consider this should be evidenced by DS2.
- 6.16 We understand from DS2's report that the building is now fully let, with the exception of the basement level storage.

The Proposed Benchmark

- 6.17 DS2 adopt a Benchmark Land Value of £39,298,326. In their assessment, they tested three different EUV-based approaches, which are similar to their pre-application submission. They tested two scenarios assuming the property would be refurbished, which are effectively AUVs. Scenarios are summarised below:
- **Approach One:** Assumes no refurbishment and the building is let in its existing condition. DS2 adopted the Term and Reversion method of valuation.
 - **Approach Two:** Assumes nominal refurbishment cost
 - **Approach Three:** Assumes a light refurbishment cost
- 6.18 DS2's inputs are summarised in the table below:

Input	<u>DS2's Assessment</u>		
	Approach One (No Refurb)	Approach Two (Nominal Refurb)	Approach Three (Light Refurb)
Office Rent (£psf)	£30 (Reversion) Term rent not provided	£42.50	£57.50
Office Yield	5% - 6.75% (Term) 6.75% (Reversion)	6.65%	6.25%
RF & Void	30 months	36 months	36 months
Car Parking rent pa	£35,000	£76,248	£76,248
Car Parking Yield	5.5%	5.5%	5.5%
Purchaser's Costs	6.8%	6.8%	6.8%

Refurbishment Costs	-	£52.20 psf (NIA) (£5,419,561)	£120psf (GIA) (£18,486,307)
Contingency	-	5%	5%
Refurbishment Period	-	3 months	6 months
Professional Fees	-	10%	10%
Letting & Legal Fees	-	15%	15%
Marketing Fees	-	£2.50psf	£2.50psf
Sales Agent & Legal Fees	-	1.5%	1.5%
Finance	-	7.5%	7.5%
Profit	-	10% on Cost	10% on Cost
EUV	£32,748,605	£34,818,574	£39,282,540
Landowner's Premium	20%	-	-
BLV	£39,298,326	£34,818,574	£39,282,540

- 6.19 We have not received a floor-by-floor rental assessment from DS2.
- 6.20 DS2 did not disclose any of the passing rents in the development but emphasised that the property is currently overrented. We have not received any leases or evidence that would confirm this. During pre-application advice, we had received the tenancy schedule; however, the passing rent was largely calculated on a profit share basis and was not provided. We assume this remains the case.
- 6.21 DS2 assume the capital value of the term to be £828,327; however, we do not consider that sufficient information has been received to allow us to verify this figure.
- 6.22 On this basis, we consider it appropriate to assess an EUV (Approach 1) on the basis that the property is vacant and would be let at the market rent. This is consistent with our pre-application advice.
- 6.23 No evidence supporting car parking values has been provided. DS2's approach to the car park value is unclear, they appear to have assumed that the car park is capable of operating as an individual entity and being sold separately to an investor. No evidence to prove demand for such an investment has been provided, and we question whether this exists. We consider DS2 should provide evidence to support their assumption. In the meantime, we have assumed the car park would operate as a part of the office building and would generate a sundry rental income. The same assumption was adopted in our pre-application assessment.
- 6.24 We note that DS2 assume that the car parking rental income would double in the light refurbishment scenario, which is somewhat questionable.

- 6.25 Similar to their pre-application submission, DS2 do not specify what works are included in the respective refurbishment options; therefore, we are unable to ascertain what standard of building may result. We do, however, consider that the levels of cost allowance described by DS2 would be sufficient for limited cosmetic works only.
- 6.26 We have assessed the refurbishment options with our Cost Consultant, Neil Powling, who concludes as follows:
- “The AUV includes: Approach three a light refurbishment cost of £120.06/ft² (£1,292/m²). We consider a BCIS median rate an appropriate basis for the calculation of a refurbishment cost. The BCIS median rate LF100 is £1,267/m²; adjusted to a Camden location of 125, the rate is £1,584/m². With a 5% addition for contingency, the refurbishment construction cost would be £23,758,388”*
- 6.27 We also note that the nominal refurbishment cost has been assumed on the NIA basis, which we do not consider appropriate. Any refurbishment should be calculated on the basis of GIA, as specified in BCIS. In addition, the nominal rate adopted by DS2 is significantly below BCIS's lowest quartile (£798psf). On this basis, we do not consider it realistic to assume that nominal works would secure any significant improvement and, by extension, a higher rent of the building.
- 6.28 In our previous assessment, we relied on the office report prepared by our retained Consultant Crossland Otter Hunt ('COH'), dated 8th October 2023, who concluded a “nominal refurbishment” option proposed by DS2 as follows:
- “We have not, in this case, considered the nominal refurbishment of the property at £50 per sqft. or the £100 per sqft. refurbishments. We are of the opinion that at these levels of refurbishment, the difference to the building would be largely superficial and as such similar to the existing use. “*
- 6.29 On this basis, we maintain that scenario 2 proposed by DS2 is somewhat unrealistic, and we have not tested it in our assessment.
- 6.30 In support of the yield adopted, DS2 include investment evidence of Grade B office space in midtown, with the yield ranging between 5.5%- 8%.
- 6.31 In support of the rental values adopted, DS2 provide comparable evidence of lease transactions of second-hand office accommodation completed between 2024 and 2025, ranging between £18- £54psf. We note that the majority of evidence shows office accommodation of less than 3,000 sq ft, with the exception of High Holborn House (8,185 sq

ft/ £52.50psf) and Holborn Island (11,450 sq ft/ £32.50psf). The evidence, therefore, reflects significantly smaller floor areas than the building (103,823 sq ft NIA), or even an average single floor within.

- 6.32 In our view, the evidence should present larger suites/buildings to provide more comparability to the existing building.
- 6.33 Given evidence available, we consider it reasonable to assume that the space could be let on a floor-by-floor basis, in which case additional costs associated with multi-let properties should be applied. DS2 did not clarify whether such an assumption was made in their assessment.
- 6.34 DS2 assume a 20% Landowner's Premium, which we consider to be overstated. Given that some of the floors are vacant, we assume the existing owner is currently incurring empty property costs. In addition, the majority of the existing leases operate on a profit share basis, which does not constitute a steady income stream. On this basis, we consider 10% to be more appropriate. This is consistent with our pre-application advice.

Our Assessment of Benchmark Land Value

- 6.35 We have approached the Benchmark Land Value on an Existing Use Value basis. We have considered the following approaches in our assessment:
- Approach One:** Assumes no refurbishment and the building is let in its existing condition. DS2 adopted the Term and Reversion method of valuation.
- Approach Two:** Assumes a nominal refurbishment cost – not considered
- Approach Three:** Assumes a light refurbishment cost (Effectively an AUV)
- 6.36 To emphasise, we do not consider that the light refurbishment cost would be sufficient to bring the building to the high standard. It is also apparent that the building would not be compliant with current environmental standards, which would likely affect the demand.
- 6.37 We have applied a light refurbishment cost of £23,758,388 as per Mr Powling's advice. We have also aligned other assumptions with those adopted for the proposed scheme.
- 6.38 We would expect the building to be let on a floor-by-floor basis, and we have adjusted our assessment to reflect this.
- 6.39 We have conducted an additional search of the rental and investment comparables, which are summarised in Appendices 3 & 4 of this report.

- 6.40 Our rental evidence is located within 0.25 miles of the subject site. We have focused our assessment on offices comprising over 5,000 sq ft to increase the comparability to the subject site. It can be seen that the rental values range between £40- £58psf.
- 6.41 We have identified evidence of a lease renewal of the 24,014 sq ft GF and 4-5th floor lease in Fox Court, where £49psf was achieved, which is essentially a current passing rent. Noting the unit size, we consider that a discount would be applicable to reflect the rental value of the building if let as a whole.
- 6.42 We have searched for additional rental evidence that would underpin the rental value adopted for Approach One; however, we have not identified any additional evidence that would be more relevant than that produced by DS2. In addition, we consider their adopted £30psf broadly aligns with the assessment conducted by COH at the pre-application assessment, and we have not seen any movement in rental values of dated office accommodation since. On this basis, we accept DS2's rental value of £30psf.
- 6.43 In consideration of the light refurbishment option rents (Approach Three), we found Fairfax House to be a good comparable, comprising a c.14,000 sq ft office located on floors 2-5, accommodation, which was renewed at £58psf. We note the building has an of EPC 'C', which is inferior to Fox Court (EPC 'B'). We consider this evidence to be comparable to the subject, albeit adjustment needs to be made on account of unit size.
- 6.44 We also found 20 Farringdon Road (£45psf) to be a good comparable. It benefits from a modern interior and open plan layout. It is located within a 7-minute walk of the subject, closer to Farringdon Road. In our view, the building is comparable to the subject after light refurbishment has been carried out, although in an inferior location. The leased floor comprises over 18,000 sq ft, which is slightly larger than a single floor in the subject site. On this basis, we consider a single floor of the existing building would achieve a higher value on a psf basis on account of the unit size.
- 6.45 We also note that the rental value achieved at the 1st floor at 22 Chancery Lane, comprising c. 6,000 sq ft was £62psf. Noting that both buildings are of a similar condition (assuming post-refurbishment), we consider the comparable to be broadly similar to the subject; however, an adjustment needs to be made to account for unit size.
- 6.46 Overall, we are of the view that rental values included in DS2's assessment have been overstated. We have outlined our proposed rental values for Approach Three in the table below:

Floor Level	Size (sf)	Approach Three BPS' Rent (psf)
B	8,885	£50
GF	1,423	£50
GF	11,990	£50
1	15,369	£50
2	14,444	£55
3	14,275	£55
4	12,933	£55
5	8,153	£60
6	8,175	£60
7	8,176	£60
Total	103,823	£5,644,450
Average	10,382	£54.37

- 6.47 In addition, we note that the Fetter St office space, comprising a much larger area of 58,000 sq ft and let to a single occupant, achieved a rental value of c. £58psf. The space is superior to the subject, 2016 built, and benefits from a BREEAM excellent rating. We do not think that the light refurbishment would be suffice to bring the property to this standard. This further confirms that DS2's assessment is somewhat overstated, and our assumed rental figures fall in line with the available evidence tone.
- 6.48 Our assessment also broadly aligns with figures provided by COH in their 2023 report.
- 6.49 In respect of the investment yields, we consider 22 Ragged School (6.22%) to be a good comparable for assessing Approach Three. The building was renovated in 2023 and comprises 4-storey office accommodation. It is located within a 0.3-mile walk of the subject site, however, the accessibility to transport links of the subject is in fact better.
- 6.50 Having analysed the investment evidence, we consider the yields adopted by DS2 to be broadly reasonable.
- 6.51 In our assessment of car parking values, we found that Brook Street Car Park EC1N, located near the subject site, charges c. £20 per day. In our view, £3,000 pa would be achievable for each space, which we have reflected in our assessment.
- 6.52 Our assessment in summarised in the table below:

Input	BPS' Approach One (No Refurb)	BPS' Approach Three (Light Refurb)
Office Rent (£psf)	£30	£54.37
Yield	6.75%	6.25%

RF & Void	36 months	30 months (marketing during the refurb period)
Car Parking rent pa (27 spaces)	£81,000	£81,000
Purchaser's Costs	6.8%	6.8%
Refurbishment Costs	-	£154psf (GIA) (£23,758,388)
Contingency	-	5%
Refurbishment Period	-	6 months
Professional Fees	-	10%
Letting & Legal Fees	-	15%
Multi Let Costs	-	5%
Sales Agent & Legal Fees	-	1.5%
Finance	-	7.5%
Profit	-	10% on Cost
EUV/ AUV (Rounded)	£35,517,000	£32,844,000
Landowner's Premium	10%	-
BLV (Rounded)	£39,069,000	£32,844,000

6.53 We therefore adopt a BLV of £39,069,000 (Approach One), which broadly compares with DS2's adopted £39,298,326 (also generated by Approach One). On this basis, we consider their assessment to be reasonable.

7.0 Development Values

- 7.1 The proposed scheme includes office space of 22,601 sq m (243,275 sq ft) GIA, set across 8 floors. We understand from DS2's report that the space is proposed to be split between Affordable and Private components as follows:

Component	Floors	NIA sq ft	NIA sq m
Affordable NIA	Basement- GF	12,249	1,138
Private NIA	GF- 8 th Floor	151,211	14,047
Total		163,460	15,185

- 7.2 We note from the plans that the proposed scheme would benefit from an open plan layout, with the Café unit and reception located on the ground floor. There would be a WC on every floor, cycle parking in the basement and a lift to all floors.

Private Commercial

- 7.3 In our 2024 review, we relied on the office value assessment provided by our retained consultant, Crossland Otter Hunt ('COH'). They recommended a rental value of £74.80psf and a yield of 5.25%, as well as a 24-month combined rent-free and void period.
- 7.4 In their current assessment, DS2 adopt c.£70psf rental value, 5.75% yield, 24-month rent-free period and a 9-month letting period post construction. DS2's adopted GDV reflects c.£1,127psf.
- 7.5 DS2 adopt a rent-free period based on advice from Avison Young, however, this evidence has not been provided.
- 7.6 In support of the rental values adopted, DS2 include comparable evidence of new build/ recently refurbished office accommodation in the area, leased between 2024 and 2025 and ranging between £58- £76psf. They also refer to various market reports quoting rents ranging between £77.5- £85psf. We note their adopted rent reflects a reduction to the quoted market reports.
- 7.7 In support of the yield level adopted, DS2 include comparable investment yield evidence ranging between 4.30%- 8%. The evidence shows a range of refurbished spaces, but no new build. DS2 also quote Avison Young and Cushman & Wakefield market reports from Q1 2025 showing a yield of 5.75%.
- 7.8 We have sought to identify any additional transactions in the surrounding area to test whether the value assigned to this element of the scheme is reasonable. Our research is included in

Appendices 4 & 5 of this report. Our identified rental comparables are located within 0.3 miles of the subject site.

- 7.9 We found an available evidence range between £53- £95psf. Noting the Fetter Yard evidence, where the 5th floor comprising over 9,943 sq ft was leased for c.£77.50psf. We also found Stonecutter St to be a useful comparable, which is a brand new 2025 office with an excellent BREEAM rating, with the 4th floor achieving £95psf.
- 7.10 On this basis, we are of the view that rental values adopted by DS2 are somewhat conservative.
- 7.11 Based upon the above, we are of the view that an average rent of £75.78 could be generated from the commercial space. Our rental assessment is summarised in the table below:

Floor Level	Size (sf)	BPS' Proposed Rent (psf)
GF	5,490	£60
1	23,153	£70
2	22,109	£75
3	21,635	£75
4	19,515	£75
5	19,795	£77
6	15,425	£80
7	16,275	£80
8	7,815	£90
Total	151,212	£11,458,100
Average	18,901	£75.78

- 7.12 We have adopted a 24-month rent-free period, in line with DS2's assessment. We assume the letting period would overlap with the construction period.
- 7.13 Having analysed available investment transactions (Appendix 4) we found that the majority of the identified evidence reflects dated buildings, with some of them being renovated within the past few years. The evidenced yields range between 4.9%- 8% (£403psf- £1,160psf).
- 7.14 We consider the Turnmill (4.9%) to be a good comparable. This 2015, 5-storey new office accommodation was sold in May 2024 and achieved c. £1,100psf. The building is located within c. 10-minute walk from the subject site and comprises a broadly similar area. 92% of the building was leased at sale. The average floorplate at Turnmill is around 10,000 sq ft, which is slightly smaller than the subject. Noting that the building was constructed in 2012, we would expect it to provide an inferior quality of accommodation than the subject. In addition,

we note the average rent of £58psf is achieved at the development, which also indicate an inferior quality of accommodation than we would expect at the completed development. Finally, noting that the Turnmill comprise a 5-storey accommodation, we would expect the proposed scheme to achieve a higher value on a psf on account of the height premium.

- 7.15 The yield of Turnmill is significantly lower than that adopted by DS2, however we note, the achieved price on a psf basis compares with the one adopted by DS2. We are of the view, however, that the proposed scheme is superior to the Turnmill and would achieve a higher value on a psf basis.
- 7.16 We also found Norfolk House (5.48%) to be useful evidence. This 6-storey building was renovated in 2024. Only 62% was leased at the moment of sale, which could have reduced the NIY. We consider the comparable to be an inferior building, comprise smaller floorplates and attracting a lower rent achieving c.£61psf.
- 7.17 In addition, it should be noted that DS2's October 2023 assessment reflected a capital value of £1,240psf, which was based on a £70psf and a 5% yield. Their current assessment, therefore, reflects a c. 9% reduction in capital value in comparison to their 2023 figures. By contrast, according to Knight Frank Yield Guide, it appears that the city prime yield has not moved since October 2023 and there is no clear evidence presented to us that would support that office values have in fact decreased over that time period.
- 7.18 We are of the view that DS2's yield of 5.75% is somewhat pessimistic. Given that the evidence of new or recently renovated sites located within a 10- 15 minute walk from the site is achieving between 4.9%- 5.5%, we consider it unreasonable to assume a higher yield for the proposed scheme.
- 7.19 In our view, a 5.5% yield is appropriate, even conservative, given the location of the building. When applied to the market rent, this results in a value of £187,173,775 (£1,238psf) before accounting for the purchaser's costs. Our calculated value psf also reflects an increase to the Turnmill development, which we consider appropriate.

Affordable Workspace

- 7.20 DS2 assumed the Affordable GDV of £7,054,105 (£576psf), which reflects c. 50% OMV, the implication being that the space would be available on the affordable rent in perpetuity. On this basis, we accept the percentage of 50%, on the assumption that the affordable workspace discount is provided in perpetuity in the S106 Agreement.

7.21 In line with Camden's Affordable Workspace Strategy (Oct 2023), which stipulates that the affordable workspace would be provided at 50% of the open market value. Based on our assessment of the open market commercial GDV, this results in a GDV psf of £619psf for the affordable workspace, which we have adopted in our appraisal.

8.0 Development Costs

Construction Costs

8.1 Our Cost Consultant, Neil Powling, has analysed the build cost plan for the proposed scheme prepared by Third London Wall ('TLW'), dated 29th July 2025, and concludes that:

"Our benchmarking results in an adjusted benchmark of £4,242/m² that compares to the Applicant's £4,171/m². We therefore consider the Applicant's costs to be reasonable."

8.2 Mr Powling's full cost report can be found at Appendix 2.

8.3 DS2 adopted an additional neighbourly matters allowance of £1,672,778. Given no evidence has been provided, we have excluded this from our appraisal. We reserve the right to revisit our assessment pending evidence being provided.

Additional Costs

8.4 DS2 have applied the following additional cost assumptions:

- Professional fees of 10%
- Marketing fees of £2.50psf
- Sales agent & legal fees of 1.50%
- Letting agent fees of 12%
- Letting legal agent fees of 5%

8.5 Generally, we consider combined sales agent, marketing and legal fees should not exceed 1.5%. We also found 12% letting agent fee to be excessive and consider 10% to be more appropriate. We have adjusted these allowances in our appraisal of the proposed, as well as the AUV scheme.

8.6 CIL and S106 charges have been assumed at £2,893,018 and £288,745 respectively. We request that the Council verify these amounts.

8.7 Finance has been included at 7.5% assuming that the scheme is 100% debt financed. We consider this finance allowance to be acceptable, albeit on the upper end of our expectations.

Profit

8.8 The developer profit target adopted by DS2 is 15% on GDV. We note the proposed scheme would not be subject to complete demolition. It is our understanding that the existing structure

would be extended and the interior would be subject to a conversion. We consider profit on refurbishment is generally more equitably measured on Cost rather than on a GDV basis.

- 8.9 We were advised by our Cost Consultant, Neil Powling, that the proposed plans reflect the build ratio of conversion to extension at a ratio of 63:37. On this basis, given that the majority of the works are connected to new elements of the building, we consider Profit on GDV to be appropriate.
- 8.10 Given that the Affordable Workspace would have lower void risk, we consider a lower profit target of 6% would be more appropriate.

Development Timeframes

- 8.11 DS2 have adopted a pre-construction period of 6 months and a construction period of 30 months. Our Cost Consultant has reviewed the programme with reference to the BCIS duration indicator and concluded as follows:

“The duration allowed in the Applicant’s appraisal comprises a pre-construction period of 6 months and a construction period of 30 months. The results determined from the BCIS duration calculation provide an estimated average construction duration from start on site to construction completion of 79 weeks (18.2 months) with a 90% confidence interval for this estimate of 73 to 84 weeks (16.8 to 19.4 months). We consider the Applicant’s allowance for pre-construction reasonable. However, we consider the duration for construction compared to BCIS too long and suggest a provision of 19 months.”

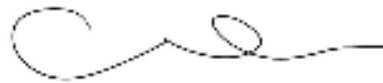
- 8.12 DS2 have adopted a letting period of 6 months and assumed the sale would occur on 1st month post letting. We are of the view that the 9-month letting period would likely happen during the refurbishment period. We have, therefore, assumed the sale would occur on the first month after the construction period. This also aligns with the assumptions adopted in our earlier assessments.

9.0 Author Sign Off

- 9.1 This report is provided for the stated purpose and for the sole use of the named clients. This report may not, without written consent, be used or relied upon by any third party.
- 9.2 The author(s) of this report confirm that there are no conflicts of interest and measures have been put in place to prevent the risk of the potential for a conflict of interest. In accordance with the RICS Professional Statement *Financial Viability in Planning: Conduct and Reporting* September 2019, this report has been prepared objectively, impartially, and with reference to all appropriate sources of information. In preparing this report, no performance-related or contingent fees have been agreed.
- 9.4 The following persons have been involved in the production of this report:



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October 2025

Appendix 1: Glossary

Term	Definition (links provided for further information)
Actual Developer Return (or profit)	As opposed to target return, the actual return is what developers are due to receive from a development scheme.
Affordable Rent:	Affordable rent is rent that is set at up to 80% of market rent (including service charges). Includes SR, LAR and DMR housing.
Social Rent (SR)	Social rent is usually rent that is paid to registered providers and local authorities. It is low-cost rent that is set by a government formula.
London Affordable Rent (LAR)	London Affordable Rent (LAR) homes are rented by social landlords with rents capped at benchmark levels published by the Greater London Authority. They are lower than the 80% per cent of market rents at which affordable rents can be charged. The London Plan
Discounted Market Rent (DMR)	Usually at 80% or less of open market rent, or to LAR levels.
Alternative Use Value (AUV)	Ultimately, AUV considers other options for a property to ascertain the highest value and best use for the land. There's usually more than one thing that can be done to release value in a site, and it's logical that the landowner should consider all avenues before bringing a scheme forward. Government guidance allows viability assessors to consider the alternative use value of a building as a benchmark, provided this relates to a lawful use which complies with the adopted development plan. This alternative use can therefore be: <ul style="list-style-type: none"> - a legal permitted change of use or development (which does not require planning permission) - an existing planning permission (for example a smaller scheme) - or a proposal which fully complies with all development plan policies. Existing Use Value remains the preferred method of assessing BLV under PPG and AUV use is limited by a number of specific conditions. NPPG
Benchmark Land Value (BLV)	The benchmark land value (BLV) is the hypothetical land value used to assess planning viability; it does not include hope value. Established based on either the existing use value (EUV) or the Alternative Use Value (AUV) of the land and may include a Landowner Premium. NPPG
Construction Costs	Total build costs associated with the development.
Build to Rent (BTR)	Build to Rent is a property development that is designed with the sole intention of appealing to the rental market as opposed to long-term home ownership. The London Plan
Co-Living	the practice of living with other people in a group of homes that include some shared facilities (typically shared working, leisure spaces and kitchens). The London Plan
Community Infrastructure Levy (CIL)	The Community Infrastructure Levy (CIL) is a levy on development that councils across the country, are implementing. It helps to pay for local infrastructure including schools, paths, parks, open spaces and healthcare facilities.
Developer Return (or profit)	The amount or percentage return retained or retainable by the developer. NPPG
Developer return on cost	The amount of developer Return expressed as a percentage of Build Costs. NPPG
Developer return on GDV	The amount of Developer Return expressed as a percentage of GDV. NPPG
Development Appraisal	A financial appraisal of a development. It is normally used to calculate either the residual site value or the residual development profit, but it can be used to calculate other outputs. RICS Development Valuation
Existing Use Value (EUV)	What property or land is worth in its current form. In other words, the hypothetical price that it can be sold for on the open market, assuming it will only be used for the existing use for the foreseeable future and that no capital works will be undertaken. It excludes hope value for redevelopment. NPPG
Extra Care	The term 'extra care' housing is used to describe developments that comprise self-contained homes with design features and support services available to enable self-care and independent living.
Fair Value	'The price that would be received to sell an asset, or paid to transfer a liability, in an orderly transaction between market participants at the measurement date.' (This definition derives from international Financial Reporting Standards IFRS 13.) The Red Book

Gross Development Value (GDV)	The value of a development once construction has been completed, or the total sum of the sales values for the finished development. NPPG
Gross External Area (GEA)	Broadly speaking the whole area of a building taking each floor into account, including the thickness of the external walls. Most similar to IPMS 1. Code of Measuring Practice IPMS
Gross Internal Area (GIA)	Broadly speaking the whole enclosed area of a building taking each floor into account and excluding the thickness of the external walls. Most similar to IPMS 2. Code of Measuring Practice IPMS
Ground Rent	An additional amount which many people who own leasehold properties must pay. It's charged by a "landlord", although the more accurate term is perhaps "freeholder" – the person who owns the land, and ultimately owns the lease. No longer applied on new dwellings.
House of Multiple Occupation (HMO)	A property shared by at least 3 people who are not from 1 'household' (for example a family) and share facilities like the bathroom and kitchen. You must have a licence if you're renting out a large HMO in England or Wales. Your property is defined as a large HMO if all of the following apply: <ul style="list-style-type: none"> • it is rented to 5 or more people who form more than 1 household. • some or all tenants share toilet, bathroom, or kitchen facilities. • at least 1 tenant pays rent (or their employer pays it for them) The London Plan
Internal Rate of Return (IRR)	The rate of interest (expressed as a percentage) at which all future project cash flows (positive and negative) will be discounted in order that the net present value (NPV) of those cash flows, including the initial investment, be equal to zero. IRR can be assessed on both gross and net of finance. RICS Development Valuation
Shared Ownership (SO)	The purchaser pays a mortgage on the share they own and pays a subsidised rent to a housing association on the remaining share. The purchaser has the option to increase their share during their time in the property via a process known as 'staircasing', and in most cases can staircase all the way to 100%. It is a form of intermediate housing.
London Living Rent (LLR)	London Living Rent is a type of intermediate affordable housing for Londoners to build up savings to buy a home. London Living Rent provides rented homes on stable tenancies, with rents based on a third of local household incomes. It is a form of intermediate housing. The London Plan
ITZA	ITZA is surveyor-abbreviation meaning 'area in terms of Zone A'. Totalling the Zone A equivalent of each zone (i.e. Zone B/2, Zone C/4 etc) and expressing the total in terms of Zone A is a method of analysing rents. Code of Measuring Practice
Landowner Premium	The premium (or the 'plus' in EUV+) is a component of benchmark land value. It is the amount (if any) above existing use value (EUV) that goes to the landowner and reflects an incentive for the landowner to dispose of the land for development. NPPG
Market Value	The estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm's length transaction, after proper marketing and where the parties had each acted knowledgeably, prudently and without compulsion. The Red Book
National Planning Policy Framework (NPPF)	The revised National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied. National Planning Policy Framework
Net Internal Area (NIA)	Broadly speaking the usable area within a building measured to the face of the internal finish of perimeter or party walls, excluding corridors and WCs etc and taking each floor into account. Most similar to IPMS 3. Code of Measuring Practice IPMS
Net Sales Area (NSA)	Net Sales Area is the GIA of a new or existing residential dwelling, including basements, mezzanines, galleries and hallways, but excluding garages, conservatories, balconies, outbuildings, terraces and restricted height areas under 1.5m. Code of Measuring Practice
Net Lettable Area (NLA)	As above, expressing the area to be rentalised. Code of Measuring Practice
Planning Obligations	Planning obligations are legal obligations entered into to mitigate the impacts of a development proposal. This is usually via s106 agreement. Planning obligations run with the land, are legally binding and enforceable. They can include affordable housing, infrastructure contributions, CIL etc.
NPPG	The National Planning Practice Guidance adds further context to the National Planning Policy Framework (NPPF) and it is intended that the two documents should be read together. Plan makers must have regard to national policies and advice contained in the guidance when developing their plans. The guidance is also a 'material consideration' when taking decisions on planning applications. This means that if a local policy is deemed out of date, local authorities may be directed by the national guidance's requirements.
Open Market Sale (OMS)	Housing that is to be sold at Market Value.

Residual Value	The amount remaining once the gross development cost of a project is deducted from its gross development value (GDV) and an appropriate return has been deducted. RICS Development Valuation
Retirement Living	A retirement village or development built specifically for older adults - often those aged 55, 60 or 65 and over. They come with a range of superb facilities and can offer on-site care.
RICS	Royal Institution of Chartered Surveyors.
Target Developer Return (or profit)	The target profit required by the developer. NPPG
The Red Book	The Red Book is issued by RICS and details mandatory practices for RICS members undertaking valuation services. It also offers a useful reference resource for valuation users and other stakeholders. The Red Book
Zoning	In retail property valuation, Zoning is the area closest to the street and the most valuable area of retail, with the value decreasing with distance from the frontage: Zone B is the next 6 metres and then Zone C until the entire depth of the retail area is allocated into a zone. Anything after Zone C is usually delegated as the remainder (of space). Code of Measuring Practice

The above definitions are indicative only and are not to be relied upon. Professional advice should always be sought.

Appendix 2: Build Cost Report

Project: Fox Court, 14 Gray's Inn Road, Camden WC1X 8HN
2025/5130/P

Independent Review of Assessment of Economic Viability

1 SUMMARY

- 1.1 The Order of Cost Estimate received is in an elemental format for the shell sections only, the CAT A fit out has been costed as a single sum. We have split this into BCIS elements using information determined for the previous Applications. There is no supporting build-up detail.
- 1.2 The allowance in the cost plan for Main Contractors D&B Risk is 2.5% - the appraisal construction cost does not include this sum but adds a 5% contingency. We consider this provision reasonable.
- 1.3 Our benchmarking results in an adjusted benchmark of £4,242/m² that compares to the Applicant's £4,171/m². We therefore consider the Applicant's costs to be reasonable.
- 1.4 The duration allowed in the Applicant's appraisal comprises a pre-construction period of 6 months and a construction period of 30 months. The results determined from the BCIS duration calculation provides an estimated average construction duration from start on site to construction completion of 79 weeks (18.2 months) with a 90% confidence interval for this estimate of 73 to 84 weeks (16.8 to 19.4 months). We consider the Applicant's allowance for pre-construction reasonable. However, we consider the duration for construction compared to BCIS too long and suggest a provision of 19 months.
- 1.5 The AUV includes: Approach three a light refurbishment cost of £120.06/ft² (£1,292/m²). We consider a BCIS median rate an appropriate basis for the calculation of a refurbishment cost. The BCIS median rate LF100 is £1,267/m²; adjusted to a Camden location of 125 the rate is £1,584/m². With a 5% addition for contingency the refurbishment construction cost would be £23,758,388.

2 METHODOLOGY

- 2.1 The objective of the review of the construction cost element of the assessment of economic viability is to benchmark the Applicant's costs against RICS Building Cost Information Service (BCIS) average costs. We use BCIS costs for benchmarking because it is a national and independent database. Many companies prefer to benchmark against their own data which they often treat as confidential. Whilst this is understandable as an internal exercise, in our view it is insufficiently robust as a tool for assessing viability compared to benchmarking against BCIS. A key characteristic of benchmarking is to measure performance against external data. Whilst a company may prefer to use their own internal database, the danger is

that it measures the company's own projects against others of its projects with no external test. Any inherent discrepancies will not be identified without some independent scrutiny.

2.2 BCIS average costs are provided at mean, median and upper quartile rates (as well as lowest, lower quartile and highest rates). We generally use mean or occasionally upper quartile for benchmarking. The outcome of the benchmarking is little affected, as BCIS levels are used as a starting point to assess the level of cost and specification enhancement in the scheme on an element-by-element basis. BCIS also provide a location factor compared to a UK mean of 100; our benchmarking exercise adjusts for the location of the scheme. BCIS Average cost information is available on a default basis which includes all historic data with a weighting for the most recent, or for a selected maximum period ranging from 5 to 40 years. We generally consider both default and maximum 5-year and also 30-year average prices. We have previously considered 5-year data more likely to reflect current regulations, specification, technology and market requirements, but because of reduce sample sizes in the last 5 years we consider the default values the most appropriate for benchmarking.

2.3 BCIS average prices are available on an overall £ per sqm and for new build work on an elemental £ per sqm basis. Rehabilitation/conversion data is available on an overall £ per sqm and on a group element basis i.e., substructure, superstructure, finishings, fittings and services - but is not available on an elemental basis. A comparison of the applicants elemental costing compared to BCIS elemental benchmark costs provides a useful insight into any differences in cost. For example: planning and site location requirements may result in a higher-than-normal cost of external wall and window elements.

2.4 If the application scheme is for the conversion, rehabilitation or refurbishment of an existing building, greater difficulty results in checking that the costs are reasonable, and the benchmarking exercise must be undertaken with caution. The elemental split is not available from the BCIS database for rehabilitation work; the new build split may be used instead as a check for some, but certainly not all, elements. Works to existing buildings vary greatly from one building project to the next. Verification of costs is helped greatly if the cost plan is itemised in reasonable detail thus describing the content and extent of works proposed.

2.5 BCIS costs are available on a quarterly basis - the most recent quarters use forecast figures; the older quarters are firm. If any estimates require adjustment on a time basis, we use the BCIS all-in Tender Price Index (TPI).

2.6 BCIS average costs are available for different categories of buildings such as flats, houses, offices, shops, hotels, schools etc. The Applicant's cost plan should ideally keep the estimates for different categories separate to assist more accurate benchmarking. However, if the Applicant's cost plan does not distinguish different categories, we may calculate a blended BCIS average rate for benchmarking based on the different constituent areas of the overall GIA.

2.7 To undertake the benchmarking, we require a cost plan prepared by the applicant; for preference in reasonable detail. Ideally the cost plan should be prepared in BCIS elements. We usually have to undertake some degree of analysis and rearrangement before the applicant's elemental costs can be compared to BCIS elemental benchmark figures. If a further level of detail is available showing the build-up to the elemental totals it facilitates the review of specification and

cost allowances in determining adjustments to benchmark levels. An example might be fittings that show an allowance for kitchen fittings, bedroom wardrobes etc that is in excess of a normal BCIS benchmark allowance.

2.8 To assist in reviewing the estimate we require drawings and (if available) specifications. Also, any other reports that may have a bearing on the costs. These are often listed as having being used in the preparation of the estimate. If not provided we frequently download additional material from the documents made available from the planning website.

2.9 BCIS average prices per sqm include overheads and profit (OHP) and preliminaries costs. BCIS elemental costs include OHP but not preliminaries. Nor do average prices per sqm or elemental costs include for external services and external works costs. Demolitions and site preparation are excluded from all BCIS costs. We consider the Applicants detailed cost plan to determine what, if any, abnormal and other costs can properly be considered as reasonable. We prepare an adjusted benchmark figure allowing for any costs which we consider can reasonably be taken into account before reaching a conclusion on the applicant's cost estimate.

2.10 We undertake this adjusted benchmarking by determining the appropriate location adjusted BCIS average rate as a starting point for the adjustment of abnormal and enhanced costs. We review the elemental analysis of the cost plan on an element-by-element basis and compare the Applicants total to the BCIS element total. If there is a difference, and the information is available, we review the more detailed build-up of information considering the specification and rates to determine if the additional cost appears justified. If it is, then the calculation may be the difference between the cost plan elemental £/m² and the equivalent BCIS rate. We may also make a partial adjustment if in our opinion this is appropriate. The BCIS elemental rates are inclusive of OHP but exclude preliminaries. If the Applicant's costings add preliminaries and OHP at the end of the estimate (as most typically do) we add these to the adjustment amounts to provide a comparable figure to the Applicant's cost estimate. The results of the elemental analysis and BCIS benchmarking are generally issued as a PDF but upon request can be provided as an Excel spreadsheet.

2.11 We have considered the duration of the construction period by reference to the average duration calculation resulting from use of the BCIS Duration Calculator, and if we consider appropriate have drawn attention to any significant divergence between the Applicant's duration and the BCIS calculation. The duration is expected to be the result of a programme in appropriate detail for the stage of the project that should be prepared by a specialist in the field. We consider our experience of construction and duration sufficient for benchmarking comparisons using BCIS, but do not possess the appropriate qualifications and experience for undertaking a more detailed examination of the construction duration.

3 GENERAL REVIEW

3.1 We have been provided with and relied upon the Financial Viability Assessment issued 28th August 2025 by DS2 together with the Stage 2 Formal Cost Plan Rev.7 Draft issued 29 July 2025 by Third London Wall - Base 3Q2025 current day.

3.2 We have also downloaded a number of files from the planning web site.

- 3.3 The information we require to undertake the cost benchmarking process outlined in section 2 is a reasonably detailed cost estimate in elemental detail with each element separately costed, with separate sub-totals in accordance with the BCIS/NRM rules of measurement, preferably presented as an elemental summary, and supported by a sufficiently detailed build-up to indicate the proposed specifications. If fit-out is separated in the estimate it too should be in similar elemental detail.
- 3.4 The Order of Cost Estimate received is in an elemental format for the shell sections only, the CAT A fit out has been costed as a single sum. We have split this into BCIS elements using information determined for the previous Applications. There is no supporting build-up detail.
- 3.5 The base date of the cost plan is 3Q2025 on a current day basis. Our benchmarking uses current BCIS data which is on a current tender firm price basis. The BCIS all-in Tender Price Index (TPI) for 3Q2025 is 404 (Provisional) and for 4Q2025 407 (Forecast).
- 3.6 The design information used to produce the cost plan has not been provided.
- 3.7 The cost plan includes an allowance of 15% for preliminaries. The allowance for overheads and profit (OHP) is 6%. We consider both of these allowances reasonable.
- 3.8 The allowance in the cost plan for Main Contractors D&B Risk is 2.5% - the appraisal construction cost does not include this sum but adds a 5% contingency. We consider this provision reasonable. All the % figures are based on a calculation of a conventional arrangement of the sums in the analysis.
- 3.9 We have extracted the cost information provided by the Applicant into a standard BCIS/NRM format to facilitate our benchmarking.
- 3.10 We have downloaded current BCIS data for benchmarking purposes including a Location Factor for Camden of 125 that has been applied in our benchmarking calculations.
- 3.11 We have adopted the same GIA used in the Applicant's cost plan; we assume this to be the GIA calculated in accordance with the RICS Code of Measurement 6th Edition 2007.
- 3.12 The building is an 11-storey building of offices. The mix of conversion and new build is provided in the table below.
- 3.13
- | | GIA m ² | % |
|----------------------------|--------------------|--------|
| Conversion/ rehabilitation | 14,287 | 63.2% |
| New build extension | 5,464 | 24.2% |
| Vertical extension | 2,850 | 12.6% |
| Total | 22,601 | 100.0% |
- 3.14 Our benchmarking results in an adjusted benchmark of £4,242/m² that compares to the Applicant's £4,171/m². We therefore consider the Applicant's costs to be reasonable.

- 3.15 The duration allowed in the Applicant's appraisal comprises a pre-construction period of 6 months and a construction period of 30 months. The results determined from the BCIS duration calculation provides an estimated average construction duration from start on site to construction completion of 79 weeks (18.2 months) with a 90% confidence interval for this estimate of 73 to 84 weeks (16.8 to 19.4 months). We consider the Applicant's allowance for pre-construction reasonable. However, we consider the duration for construction compared to BCIS too long and suggest a provision of 19 months.
- 3.16 The areas and costs included in the appraisal are consistent with the areas and costs in the cost plan.
- 3.17 The AUV includes: Approach three a light refurbishment cost of £120.06/ft² (£1,292/m²). We consider a BCIS median rate an appropriate basis for the calculation of a refurbishment cost. The BCIS median rate LF100 is £1,267/m²; adjusted to a Camden location of 125 the rate is £1,584/m². With a 5% addition for contingency the refurbishment construction cost would be £23,758,388.

BPS Chartered Surveyors

Date: 7th October 2025

Appendix 3: EUV Office Rental Comparables

Lease Comps Summary

Lease Comps Report

Deals

Asking Rent Per Sq ft

Achieved Rent Per Sq ft

Avg. Months On Market

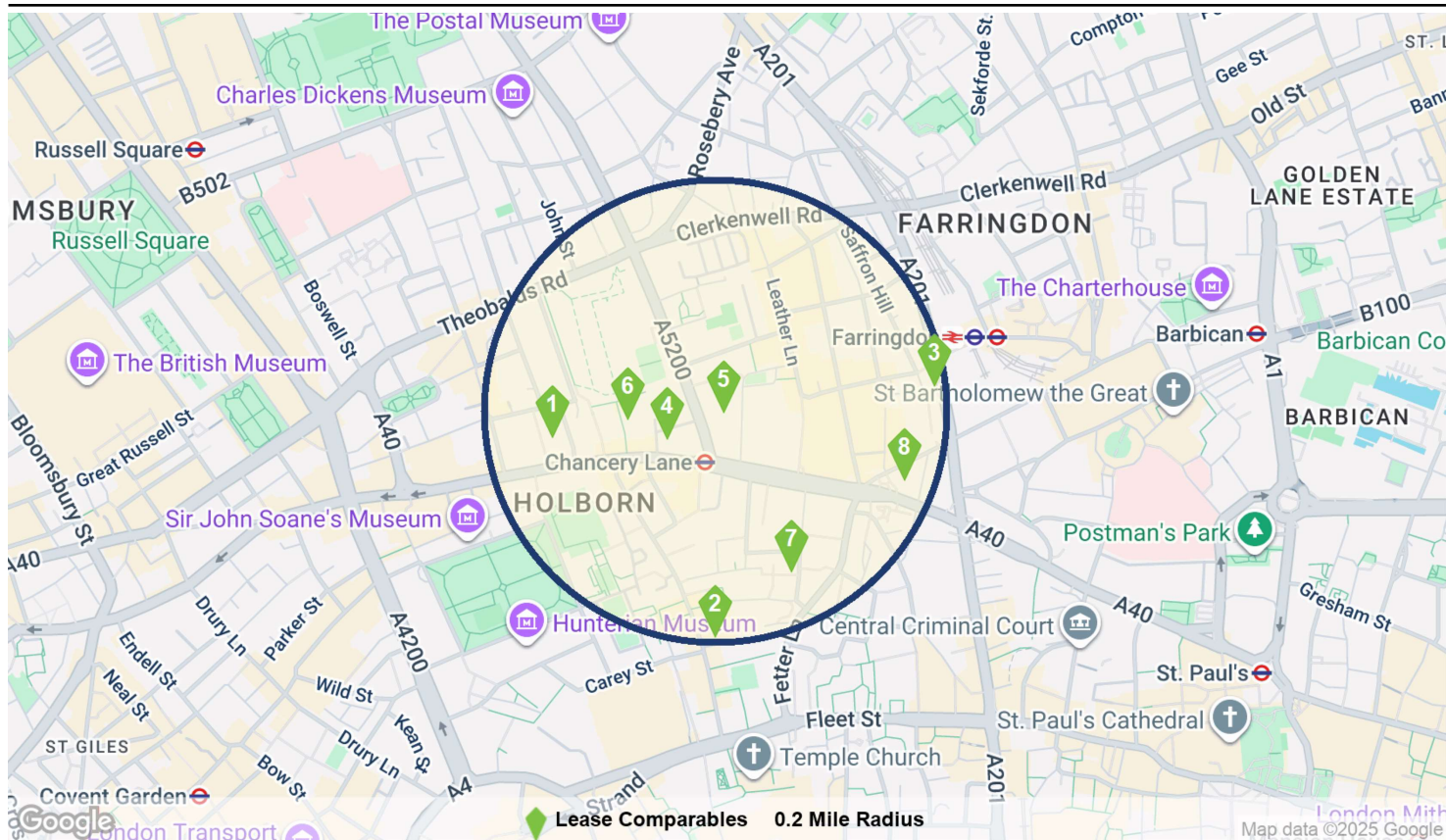
9

£58.34

£53.40

26

LEASE COMPARABLES



SUMMARY STATISTICS

Rent	Deals	Low	Average	Median	High
Asking Rent Per Sq ft	3	£57.50	£58.34	£59.50	£59.50
Achieved Rent Per Sq ft	9	£40.00	£53.40	£52.50	£62.50
Effective Rent Per Sq ft	2	£49.40	£52.66	£53.85	£58.30
Asking Rent Discount	3	11.8%	20.9%	21.7%	32.8%
TI Allowance	2	£0.00	£0.00	£0.00	£0.00
Rent Free Months	3	0	1	0	3


Lease Attributes	Deals	Low	Average	Median	High
Months on Market	3	7	26	15	57
Deal Size	9	5,040	19,477	13,906	58,376
Deal in Months	7	10.0	51.0	60.0	120.0
Floor Number	9	LL	2	3	7

Lease Comps Summary




Lease Comps Report

Property Name - Address	Rating	Lease				Rents	
		Sq ft Leased	Floor	Sign Date	Type	Rent	Rent Type
1 High Holborn House 52-54 High Holborn	★★★★★	8,185	3rd	25/03/2025	New Lease	£52.50/fri	Achieved
2 22 Chancery	★★★★★	5,856	1st	21/01/2025	Renewal	£62.50	Achieved
3 20 Farringdon Rd	★★★★★	18,109	3rd	29/11/2024	New Lease	£45.00/fri	Achieved
4 16 High Holborn	★★★★★	5,040	3rd	27/08/2024	New Lease	£40.00	Achieved
5 Fox Court 14-22 Gray's Inn Rd	★★★★★	24,014	GRND,4-5	16/05/2024	Renewal	£49.40/fri	Effective
6 Fairfax House 15 Fulwood	★★★★★	13,906	2-5	02/04/2024	Renewal	£58.30/fri	Effective
1 High Holborn House 52-54 High Holborn	★★★★★	5,257	4-5	01/04/2024	Renewal	£54.00/fri	Achieved
7 98 Fetter Ln	★★★★★	58,376	LL,GRN...	01/02/2024	New Lease	£58.09/fri	Achieved
8 40 Holborn Viaduct	★★★★★	36,550	BSMT,1-2	24/01/2024	Renewal	£50.00/fri	Achieved

Lease Comparables

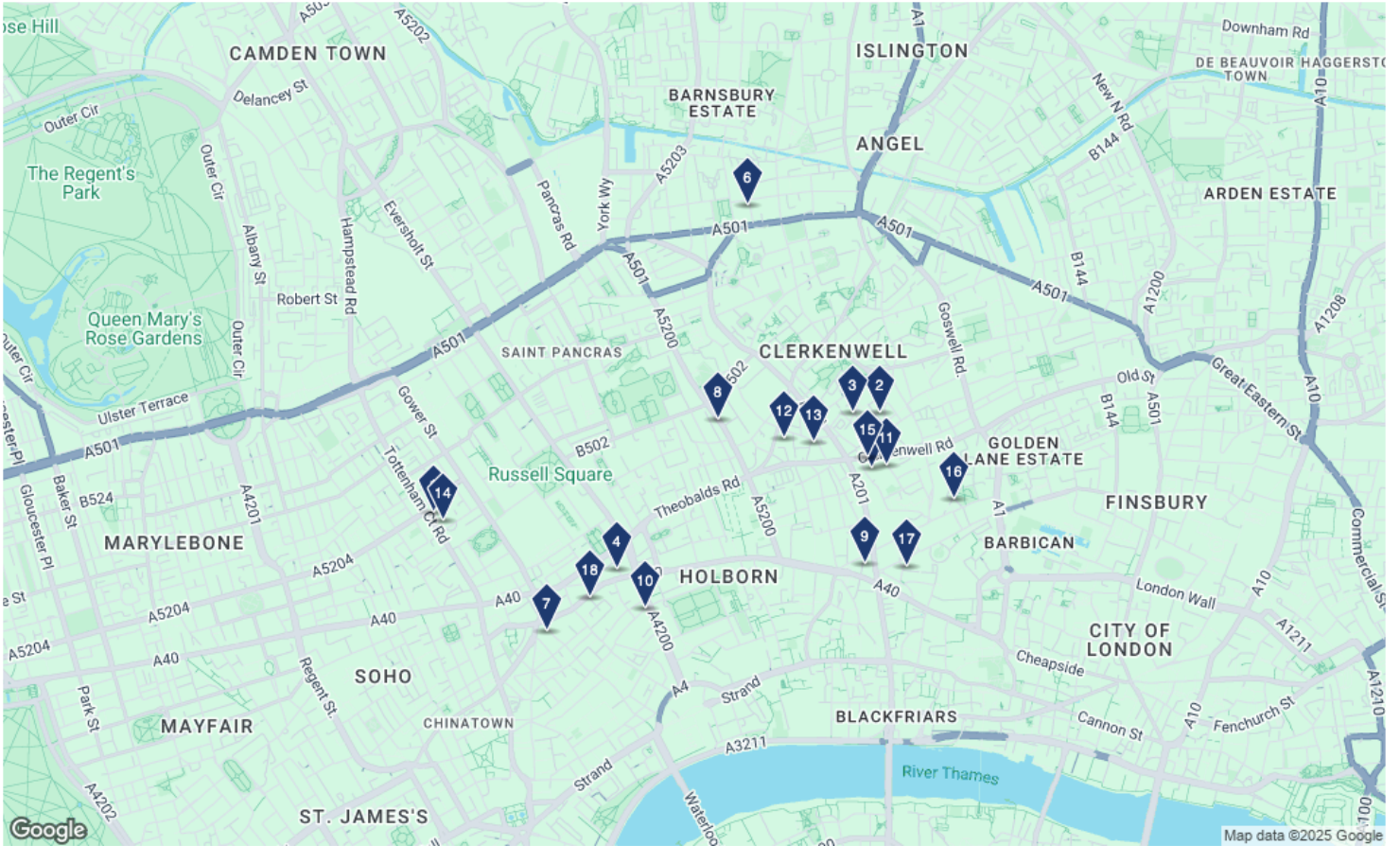
	Address	Tenant Landlord	SF Leased Type	StartDate Term	Starting Rent Effective Rent	Free Rent Rates	Breaks Reviews
	High Holborn House 52-54 High Holborn London, WC1V 6RL <i>Holborn Submarket</i>	Direct Ferries Ltd SRG Holborn Limited	8,185 New Direct	Mar 2025 10 Years	£52.50/SF	£13.19/SF	Mar 2028...
	22 Chancery London, WC2A 1LS <i>Holborn Submarket</i>	Slater & Gordon ADAM Asset Management	5,856 Renewal Direct	Jan 2025	£62.50/SF		
	17-23 Farringdon Rd London, EC1M 3HA <i>Clerkenwell Submarket</i>	Lumon Pay Ltd ARG Pension (1974) Ltd	18,109 New Direct	Nov 2024 2 Years	£45.00/SF	£12.49/SF	
	14-18 High Holborn London, WC1V 6BX <i>Holborn Submarket</i>	Homeground Management Ltd Avison Young	5,040 New Direct	Sep 2024 5 Years	£40.00/SF	£23.77/SF	Aug 2027
	Fox Court 14-22 Gray's Inn Rd London, WC1X 8HN <i>Clerkenwell Submarket</i>	Secretary of State for Levelling Up Valla Ltd	24,014 Renewal Direct	Dec 2024 10 Months	£49.40/SF £49.40/SF	0 Mos	
	Fairfax House 15 Fulwood London, WC1V 6HU <i>Bloomsbury Submarket</i>	EIP Dorrington plc	13,906 Renewal Direct	Apr 2024 5 Years	£61.84/SF £58.30/SF	3 Mos at Start £22.38/SF	

Lease Comparables

	Address	Tenant Landlord	SF Leased Type	StartDate Term	Starting Rent Effective Rent	Free Rent Rates	Breaks Reviews
	High Holborn House 52-54 High Holborn London, WC1V 6RL <i>Holborn Submarket</i>	MiQ SRG Holborn Limited	5,257 Renewal Direct	Apr 2024 5 Years	£54.00/SF		Apr 2027
	98 Fetter Ln London, EC4A 1EP <i>Holborn Submarket</i>	Macfarlanes Blackstone	58,376 New Direct	Feb 2024	£58.09/SF		
	40 Holborn Viaduct London, EC1N 2PB <i>Holborn Submarket</i>	Irwin Mitchell CBRE Investment Management	36,550 Renewal Direct	Apr 2024 2 Years	£50.00/SF	0 Mos £23.74/SF	

Appendix 4: Office Investment Comparables

Sale Comps Map & List Report



Sale Comparables Summary Statistics

Sale Attributes	Low	Average	Median	High
Sale Price	£925,000	£35,589,546	£19,500,000	£179,000,000
Sale Price Per Sq ft	£341	£754	£684	£1160
Yield	4.6%	6.8%	6.5%	9.5%
Sale Price Per ac	£13,684,865	£101,645,691	£131,108,462	£223,750,000
Property Attributes	Low	Average	Median	High
Building Sq ft	2,292 Sq ft	47,181 Sq ft	31,549 Sq ft	256,900 Sq ft
Year Built	1785	1931	1925	2015
Floors	4	7	6	12
Typical Floor Sq ft	1,630 Sq ft	7,020 Sq ft	5,214 Sq ft	29,445 Sq ft
% Leased At Sale	13.5%	90.2%	100%	100%
Star Rating	★★★★☆ 3	★★★★☆ 3.4	★★★★☆ 3	★★★★☆ 4

Summary Statistics exclude For Sale and In Exchange listings

Sale Comps List

	Property Name Address	Type	Built/Renovated	Size (% Leased)	Sale Date	Price	Yield
1	The Gable 216-219 Tottenham Court Rd London W1T 7PT	Office ★★★★☆	1905	44,000 Sq ft (100%)	30/07/2025	£18,000,000 (£409.09/Sq ft)	6.40% Actual 6.90% Pro-Forma
2	1 Sekforde St London EC1R 0BE	Office ★★★★☆	1850	23,951 Sq ft (100%)	23/07/2025	£16,000,000 (£668.03/Sq ft)	7.91% Actual
3	Office Unit: Suite 42 42-46 Clerkenwell Close London EC1R 0AZ	Office Unit ★★★★☆	1890	2,292 Sq ft	20/07/2025	£925,000 (£403.58/Sq ft)	9.54% Actual
4	Norfolk House 13 Southampton Pl London WC1A 2AL	Office ★★★★☆	1785/2024	16,752 Sq ft (67.2%)	19/05/2025	£17,580,000 (£1,049.43/Sq ft)	5.48% Actual
5	67-69 Turnmill St London EC1M 5RR	Office ★★★★☆	2010	13,146 Sq ft (100%)	17/03/2025	£9,800,000 (£745.47/Sq ft)	6.51% Actual
6	6-9 Cynthia St London N1 9JF	Office ★★★★☆	1863/2017	6,521 Sq ft (100%)	04/03/2025	£4,300,000 (£659.41/Sq ft)	6.49% Actual
7	73-77 Endell St London WC2H 9DZ	Office ★★★★☆	1920	16,025 Sq ft (100%)	20/02/2025	£5,460,000 (£340.72/Sq ft)	4.60% Actual
8	107 Grays Inn Rd London WC1X 8TZ	Office ★★★★☆	1985/2020	11,017 Sq ft (100%)	04/11/2024	£6,700,000 (£608.15/Sq ft)	8.00% Actual
9	Atlantic House 45-51 Holborn Viaduct London EC1A 2FG	Office ★★★★☆	2001	256,900 Sq ft (100%)	30/09/2024	£179,000,000 (£696.77/Sq ft)	7.71% Reversionary
10	77 Kingsway London WC2B 6SR	Office ★★★★☆	1900/1998	47,730 Sq ft (84.7%)	02/09/2024	£32,000,000 (£670.44/Sq ft)	8.00% Actual
11	The Stock House 17-18 Britton St London EC1M 5NZ	Office ★★★★☆	1983/2019	13,100 Sq ft (100%)	01/09/2024	£15,200,000 (£1,160.31/Sq ft)	5.65% Actual
12	The Ragged School 18 Vine HI London EC1R 5DZ	Office ★★★★☆	1877/2023	18,717 Sq ft (100%)	29/08/2024	£21,000,000 (£1,121.97/Sq ft)	6.22% Actual
13	Herbal House 8-10 Back HI London EC1R 5EN	Office ★★★★☆	1929/2017	114,041 Sq ft (100%)	03/07/2024	£101,000,000 (£885.65/Sq ft)	6.58% Actual
14	The Courtyard 22 Store St London WC1E 7DF	Office ★★★★☆	1900/2000	62,000 Sq ft (13.5%)	23/05/2024	£28,600,000 (£461.29/Sq ft)	6.00% Reversionary
15	The Turnmill 63 Clerkenwell Rd London EC1M 5NP	Office ★★★★☆	2015	70,300 Sq ft (92.0%)	15/05/2024	£77,350,000 (£1,100.28/Sq ft)	4.90% Actual
16	25 Charterhouse Sq London EC1M 6HP	Office ★★★★☆	1955/2017	51,897 Sq ft (85.0%)	24/04/2024	£43,496,827 (£838.14/Sq ft)	5.55% Actual
17	2 Hosier Ln London EC1A 9LJ	Office ★★★★☆	2000	41,713 Sq ft (100%)	14/03/2024	£22,000,000 (£527.41/Sq ft)	8.47% Actual
18	1 Smart's Pl London WC2B 5LW	Office ★★★★☆	1985/2019	39,148 Sq ft (91.0%)	01/03/2024	£42,200,000 (£1,077.96/Sq ft)	6.92% Actual

1

216-219 Tottenham Court Rd - The Gable

London W1T 7PT (London County) - Bloomsbury Submarket



Office

Sold	30/07/2025	Net Initial Yield	6.40%
Sale Price	£18,000,000 (£409.09/Sq ft)	Reversionary Yield	6.90%
NIA (% Leased)	44,000 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	7319243
Built	1905	Parcel Numbers	NGL842723
Land Area	0.22 ac/9,607 Sq ft		



2

1 Sekforde St

London EC1R 0BE (London County) - Clerkenwell Submarket



Office

Sold	23/07/2025	Land Area	0.20 ac/8,712 Sq ft
Sale Price	£16,000,000 (£668.03/Sq ft)	Net Initial Yield	7.91%
NIA (% Leased)	23,951 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Approximate	Sale Comp ID	7329090
Built	1850	Parcel Numbers	NGL309383



3

42-46 Clerkenwell Close

London EC1R 0AZ (London County) - Clerkenwell Submarket



Office Unit

Condo Unit	42, GRND Floor	Price Status	Confirmed
Sold	20/07/2025	Net Initial Yield	9.54%
Unit Size	2,292 Sq ft	Sale Comp Status	Research Complete
Built	1890	Sale Comp ID	7259871
Sale Price	£925,000 (£403.58/Sq ft)		



4

13 Southampton Pl - Norfolk House

London WC1A 2AL (London County) - Bloomsbury Submarket



Office

Sold	19/05/2025	Land Area	0.12 ac/5,227 Sq ft
Sale Price	£17,580,000 (£1,049.43/Sq ft)	Net Initial Yield	5.48%
NIA (% Leased)	16,752 Sq ft (67.2%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	7169929
Built/Renovated	1785/2024		



5

67-69 Turnmill St

London EC1M 5RR (London County) - City Fringe Submarket



Office

Sold	17/03/2025	Land Area	0.18 ac/7,667 Sq ft
Sale Price	£9,800,000 (£745.47/Sq ft)	Net Initial Yield	6.51%
NIA (% Leased)	13,146 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	7095274
Built	2010		



6 **6-9 Cynthia St**
London N1 9JF (London County) - Northern Fringe Submarket

★★★★☆ Office

Sold	04/03/2025	Land Area	018 ac/7,841 Sq ft
Sale Price	£4,300,000 (£659.41/Sq ft)	Net Initial Yield	6.49%
NIA (% Leased)	6,521 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	7077588
Built/Renovated	1863/2017		



7 **73-77 Endell St**
London WC2H 9DZ (London County) - Covent Garden Submarket

★★★★☆ Office

Sold	20/02/2025	Land Area	0.28 ac/12,197 Sq ft
Sale Price	£5,460,000 (£340.72/Sq ft)	Net Initial Yield	4.60%
NIA (% Leased)	16,025 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	7119566
Built	1920		



8 **107 Grays Inn Rd**
London WC1X 8TZ (London County) - Bloomsbury Submarket

★★★★☆ Office

Sold	04/11/2024	Land Area	010 ac/4,356 Sq ft
Sale Price	£6,700,000 (£60815/Sq ft)	Net Initial Yield	8.00%
NIA (% Leased)	11,017 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6940732
Built/Renovated	1985/2020		



9 **45-51 Holborn Viaduct - Atlantic House**
London EC1A 2FG (London County) - Holborn Submarket

★★★★☆ Office

Sold	30/09/2024	Land Area	0.80 ac/34,848 Sq ft
Sale Price	£179,000,000 (£696.77/Sq ft)	Reversionary Yield	7.71%
NIA (% Leased)	256,900 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6879641
Built	2001		



10 **77 Kingsway**
London WC2B 6SR (London County) - Covent Garden Submarket

★★★★☆ Office

Sold	02/09/2024	Land Area	017 ac/7,405 Sq ft
Sale Price	£32,000,000 (£670.44/Sq ft)	Net Initial Yield	8.00%
NIA (% Leased)	4,7730 Sq ft (84.7%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6879630
Built/Renovated	1900/1998		



11

17-18 Britton St - The Stock House

London EC1M 5NZ (London County) - City Fringe Submarket



Office

Sold	01/09/2024	Land Area	011 ac/4,792 Sq ft
Sale Price	£15,200,000 (£1,160.31/Sq ft)	Net Initial Yield	5.65%
NIA (% Leased)	13,100 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6877157
Built/Renovated	1983/2019		



12

18 Vine HI - The Ragged School

London EC1R 5DZ (London County) - Clerkenwell Submarket



Office

Sold	29/08/2024	Land Area	0.39 ac/16,988 Sq ft
Sale Price	£21,000,000 (£1,121.97/Sq ft)	Net Initial Yield	6.22%
NIA (% Leased)	18,717 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6831094
Built/Renovated	1877/2023	Sale Conditions	Bulk/Portfolio Sale



13

8-10 Back HI - Herbal House

London EC1R 5EN (London County) - Clerkenwell Submarket



Office

Sold	03/07/2024	Land Area	0.46 ac/20,038 Sq ft
Sale Price	£101,000,000 (£885.65/Sq ft)	Net Initial Yield	6.58%
NIA (% Leased)	114,041 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6774382
Built/Renovated	1929/2017	Sale Conditions	Distress Sale +1



14

22 Store St - The Courtyard

London WC1E 7DF (London County) - Bloomsbury Submarket



Office

Sold	23/05/2024	Land Area	2.09 ac/91,035 Sq ft
Sale Price	£28,600,000 (£461.29/Sq ft)	Reversionary Yield	6.00%
NIA (% Leased)	62,000 Sq ft (13.5%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6780806
Built/Renovated	1900/2000	Sale Conditions	Direct Exchange



15

63 Clerkenwell Rd - The Turnmill

London EC1M 5NP (London County) - City Fringe Submarket



Office

Sold	15/05/2024	Land Area	0.36 ac/15,642 Sq ft
Sale Price	£77,350,000 (£1,100.28/Sq ft)	Net Initial Yield	4.90%
NIA (% Leased)	70,300 Sq ft (92.0%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6751676
Built	2015		



16

25 Charterhouse Sq

London EC1M 6HP (London County) - City Fringe Submarket



Office

Sold	24/04/2024	Land Area	0.20 ac/8,712 Sq ft
Sale Price	£43,496,827 (£838.14/Sq ft)	Net Initial Yield	5.55%
NIA (% Leased)	51,897 Sq ft (85.0%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6684701
Built/Renovated	1955/2017		



17

2 Hosier Ln

London EC1A 9LJ (London County) - City Fringe Submarket



Office

Sold	14/03/2024	Land Area	0.17 ac/7,308 Sq ft
Sale Price	£22,000,000 (£527.41/Sq ft)	Net Initial Yield	8.47%
NIA (% Leased)	41,713 Sq ft (100%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6708404
Built	2000		



18

1 Smart's Pl

London WC2B 5LW (London County) - Covent Garden Submarket



Office

Sold	01/03/2024	Land Area	0.27 ac/11,761 Sq ft
Sale Price	£42,200,000 (£1,077.96/Sq ft)	Net Initial Yield	6.92%
NIA (% Leased)	39,148 Sq ft (91.0%)	Sale Comp Status	Research Complete
Price Status	Confirmed	Sale Comp ID	6703886
Built/Renovated	1985/2019		



Appendix 5: Proposed Scheme Rental Comparables

Lease Comps Summary

Lease Comps Report

Deals

Asking Rent Per Sq ft

Achieved Rent Per Sq ft

Avg. Months On Market

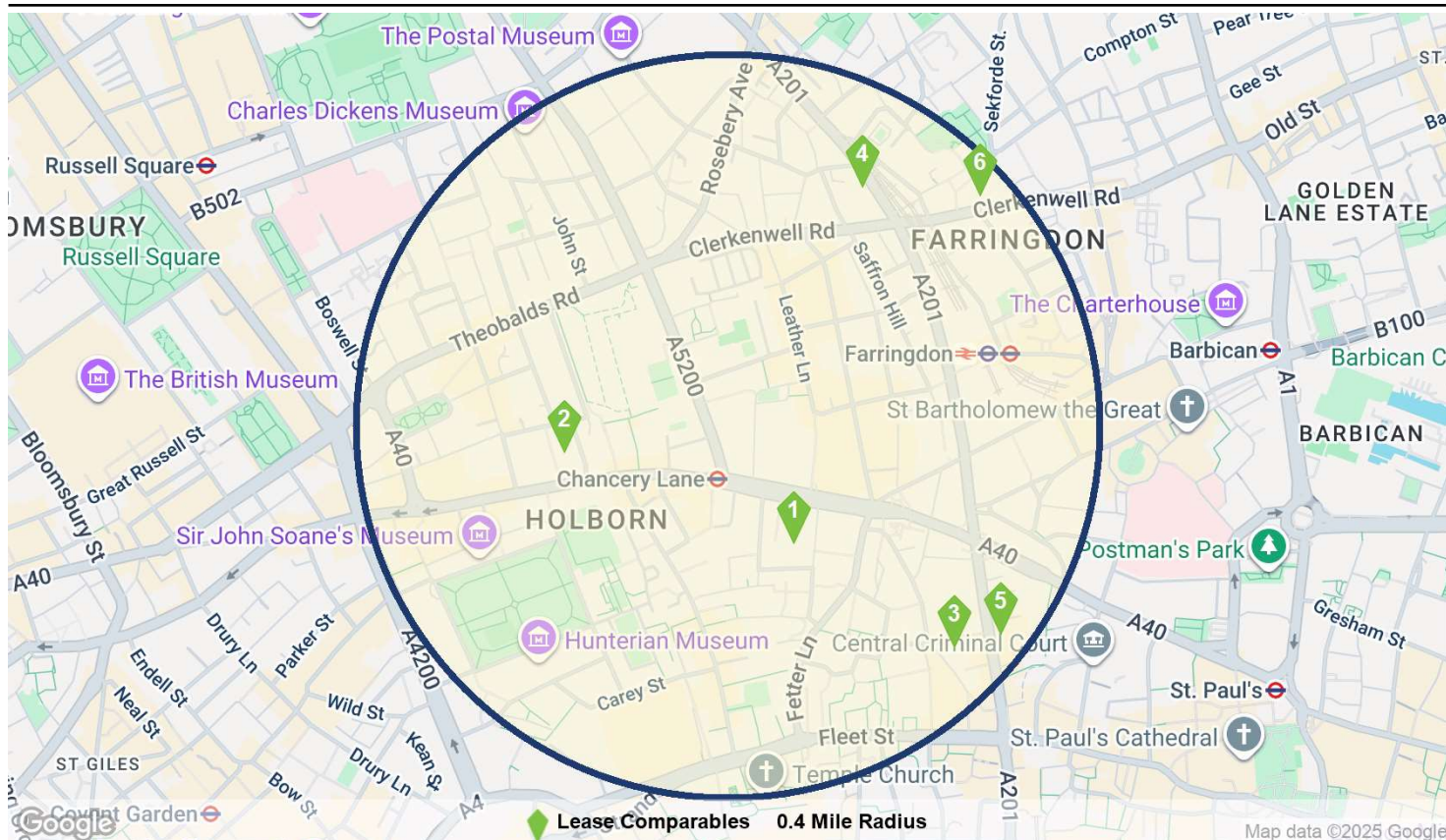
6

£75.43

£75.81

34

LEASE COMPARABLES



SUMMARY STATISTICS

Rent	Deals	Low	Average	Median	High
Asking Rent Per Sq ft	5	£57.50	£75.43	£65.00	£97.50
Achieved Rent Per Sq ft	6	£52.50	£75.81	£69.50	£95.00
Effective Rent Per Sq ft	-	-	-	-	-
Asking Rent Discount	5	-3.3%	3.5%	5.4%	11.8%
TI Allowance	-	-	-	-	-
Rent Free Months	1	24	24	24	24

Lease Attributes	Deals	Low	Average	Median	High
Months on Market	6	6	34	23	84
Deal Size	6	8,185	12,677	11,926	20,338
Deal in Months	5	57.0	109.0	120.0	132.0
Floor Number	6	BSMT	MEZZ	3	5

Lease Comps Summary

Lease Comps Report

Property Name - Address	Rating	Lease				Rents	
		Sq ft Leased	Floor	Sign Date	Type	Rent	Rent Type
1 Fetter Yard 86 Fetter Ln	★★★★★	9,943	5th	14/07/2025	New Lease	£77.50/fri	Achieved
2 High Holborn House 52-54 High Holborn	★★★★★	8,185	3rd	25/03/2025	New Lease	£52.50/fri	Achieved
3 Stonecutter 1 Stonecutter St	★★★★★	20,338	4th	19/11/2024	New Lease	£95.00/fri	Achieved
4 Satila House 109-111 Farringdon Rd	★★★★★	8,987	BSMT,G...	11/09/2024	New Lease	£54.00/fri	Achieved
5 Nexus Place 25 Farringdon St	★★★★★	14,701	4th	01/07/2024	New Lease	£61.50/fri	Achieved
6 Grafonola 102-108 Clerkenwell Rd	★★★★★	13,910	GRND,1-5	28/05/2024	New Lease	£89.50/fri	Achieved

Appendix 6: BPS' Appraisal

Fox Court - EUV with light refurb

Development Appraisal
BPS Surveyors
08 October 2025

Fox Court - EUV with light refurb

Appraisal Summary for Phase 1

Currency in £

REVENUE

Rental Area Summary

	Units	ft²	Rent Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Office	1	102,400	55.12	5,644,450	5,644,450	5,644,450
Basement Car Parking Spaces	<u>27</u>			3,000	<u>81,000</u>	<u>81,000</u>
Totals	28	102,400			5,725,450	5,725,450

Investment Valuation

Office						
Market Rent	5,644,450	YP @	6.2500%	16.0000		
(2yrs 6mths Rent Free)		PV 2yrs 6mths @	6.2500%	0.8594	77,610,283	
Basement Car Parking Spaces						
Current Rent	81,000	YP @	6.2500%	16.0000	1,296,000	
Total Investment Valuation					78,906,283	

GROSS DEVELOPMENT VALUE 78,906,283

Purchaser's Costs			(5,365,627)			
Effective Purchaser's Costs Rate		6.80%			(5,365,627)	

NET DEVELOPMENT VALUE 73,540,656

NET REALISATION 73,540,656

OUTLAY

ACQUISITION COSTS

Residualised Price			32,844,107			
					32,844,107	
Stamp Duty		5.00%	1,642,205			
Agent Fee		1.00%	328,441			
Legal Fee		0.80%	262,753			
					2,233,399	

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost
Light Refurb	153,784	154.49	23,758,388
Contingency		5.00%	1,187,919
			24,946,307

PROFESSIONAL FEES

Professional Fees	10.00%	2,375,839	
			2,375,839

MARKETING & LETTING

Letting Agent Fee	10.00%	572,545	
Multi Let Costs	5.00%	286,273	
Letting Legal Fee	5.00%	286,273	
			1,145,090

DISPOSAL FEES

Sales Agent Fee	1.00%	735,407	
Sales Legal Fee	0.50%	367,703	
			1,103,110

FINANCE

Debit Rate 7.500%, Credit Rate 0.000% (Nominal)

Fox Court - EUV with light refurb

Land	1,782,804	
Construction	424,476	
Total Finance Cost		2,207,280
TOTAL COSTS		66,855,132
PROFIT		6,685,523

Performance Measures

Profit on Cost%	10.00%
Profit on GDV%	8.47%
Profit on NDV%	9.09%
Development Yield% (on Rent)	8.56%
Equivalent Yield% (Nominal)	6.25%
Equivalent Yield% (True)	6.50%
IRR% (without Interest)	27.10%
Rent Cover	1 yr 2 mths
Profit Erosion (finance rate 7.500)	1 yr 3 mths

Fox Court - 100% Commercial

Development Appraisal
BPS Surveyors
08 October 2025

Fox Court - 100% Commercial

Appraisal Summary for Phase 1

Currency in £

REVENUE

Rental Area Summary

	Units	ft ²	Rent Rate ft ²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Office - market	1	151,211	75.78	11,458,100	11,458,100	11,458,100
Affordable workspace	1	12,249		0	0	
Totals	2	163,460			11,458,100	11,458,100

Investment Valuation

Office - market

Market Rent	11,458,100	YP @	5.5000%	18.1818	
(2yrs Rent Free)		PV 2yrs @	5.5000%	0.8985	187,173,775

Affordable workspace

Manual Value					7,582,131
--------------	--	--	--	--	-----------

Total Investment Valuation

194,755,906

GROSS DEVELOPMENT VALUE

194,755,906

Purchaser's Costs			(13,243,402)	
Effective Purchaser's Costs Rate		6.80%		(13,243,402)

NET DEVELOPMENT VALUE

181,512,504

NET REALISATION

181,512,504

OUTLAY

ACQUISITION COSTS

BLV	39,298,326			
BLV			39,298,326	39,298,326
Stamp Duty		5.00%	1,964,916	
Agent Fee		1.00%	392,983	
Legal Fee		0.80%	314,387	
				2,672,286

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost	
Build Costs	243,275	378.05	91,969,756	
Contingency		5.00%	4,598,488	
MCIL			1,822,404	
BCIL			1,070,614	
S106			288,745	
Housing PIL			3,000,000	
				102,750,007

PROFESSIONAL FEES

Professional Fees	10.00%	9,196,976	
			9,196,976

MARKETING & LETTING

Letting Agent Fee	10.00%	1,145,810	
Multi Let Costs	5.00%	572,905	
Letting Legal Fee	5.00%	572,905	
			2,291,620

DISPOSAL FEES

APPRAISAL SUMMARY**BPS SURVEYORS****Fox Court - 100% Commercial**

Sales Agent Fee	1.00%	1,815,125	
Sales Legal Fee	0.50%	907,563	
			2,722,688

Additional Costs

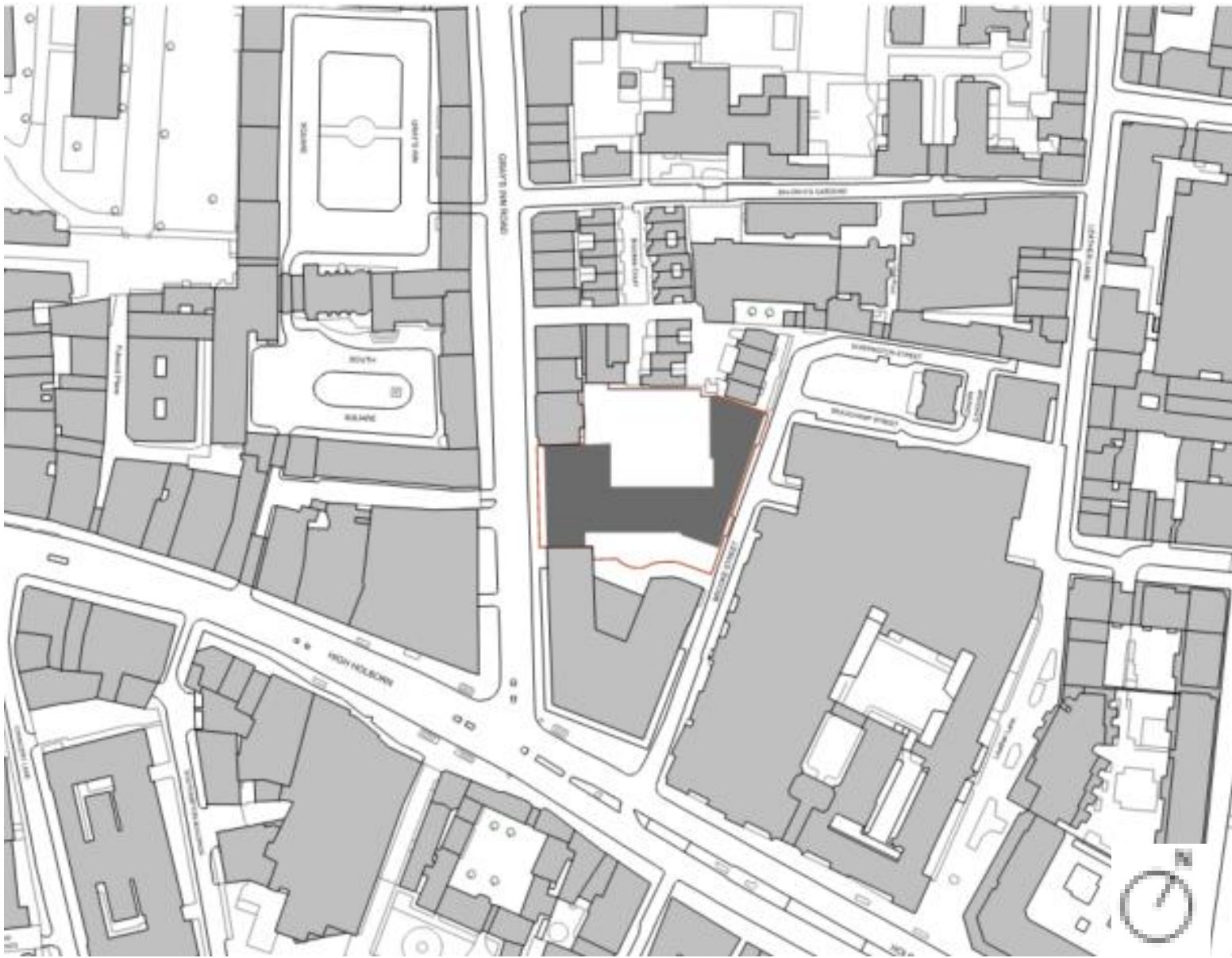
Profit on GDV (Private)	15.00%	28,076,066	
Profit on GDV (Affordable)	6.00%	454,928	
			28,530,994

FINANCE

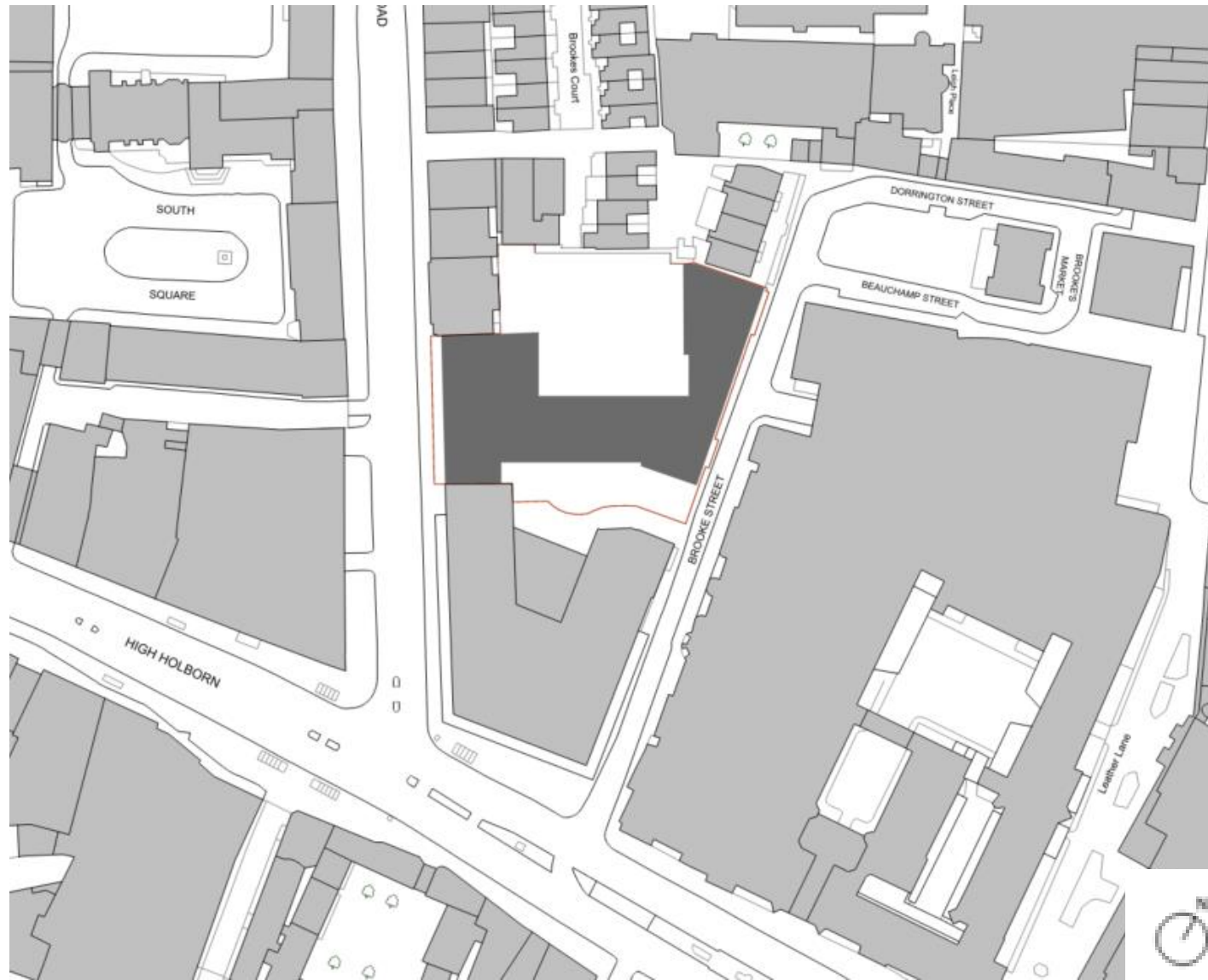
Debit Rate 7.500%, Credit Rate 0.000% (Nominal)			
Total Finance Cost			13,417,847

TOTAL COSTS**200,880,744****PROFIT****(19,368,239)****Performance Measures**

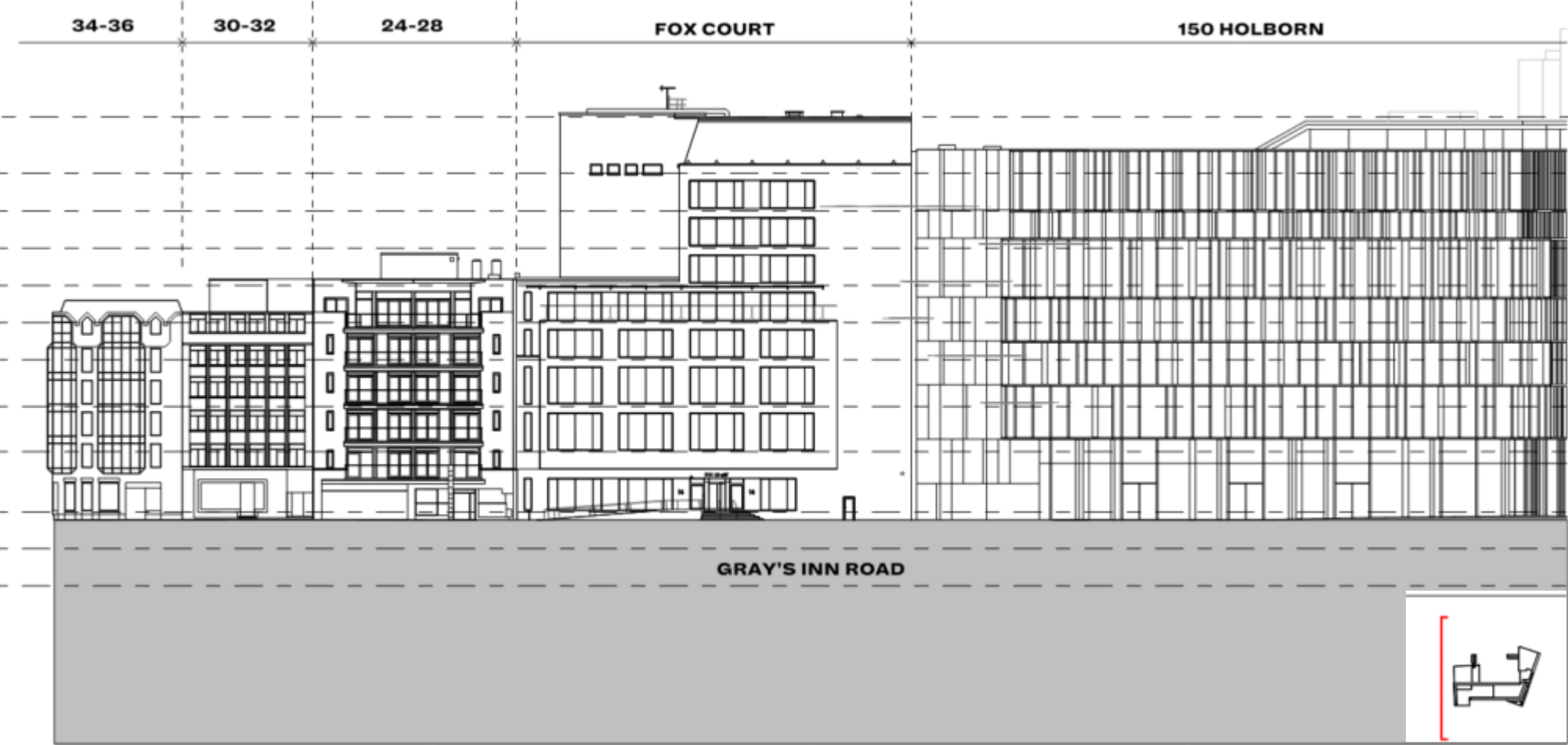
Profit on Cost%	-9.64%
Profit on GDV%	-9.94%
Profit on NDV%	-10.67%
Development Yield% (on Rent)	5.70%
Equivalent Yield% (Nominal)	5.50%
Equivalent Yield% (True)	5.69%
IRR% (without Interest)	-3.27%
Rent Cover	-1 yrs -8 mths
Profit Erosion (finance rate 7.500)	N/A



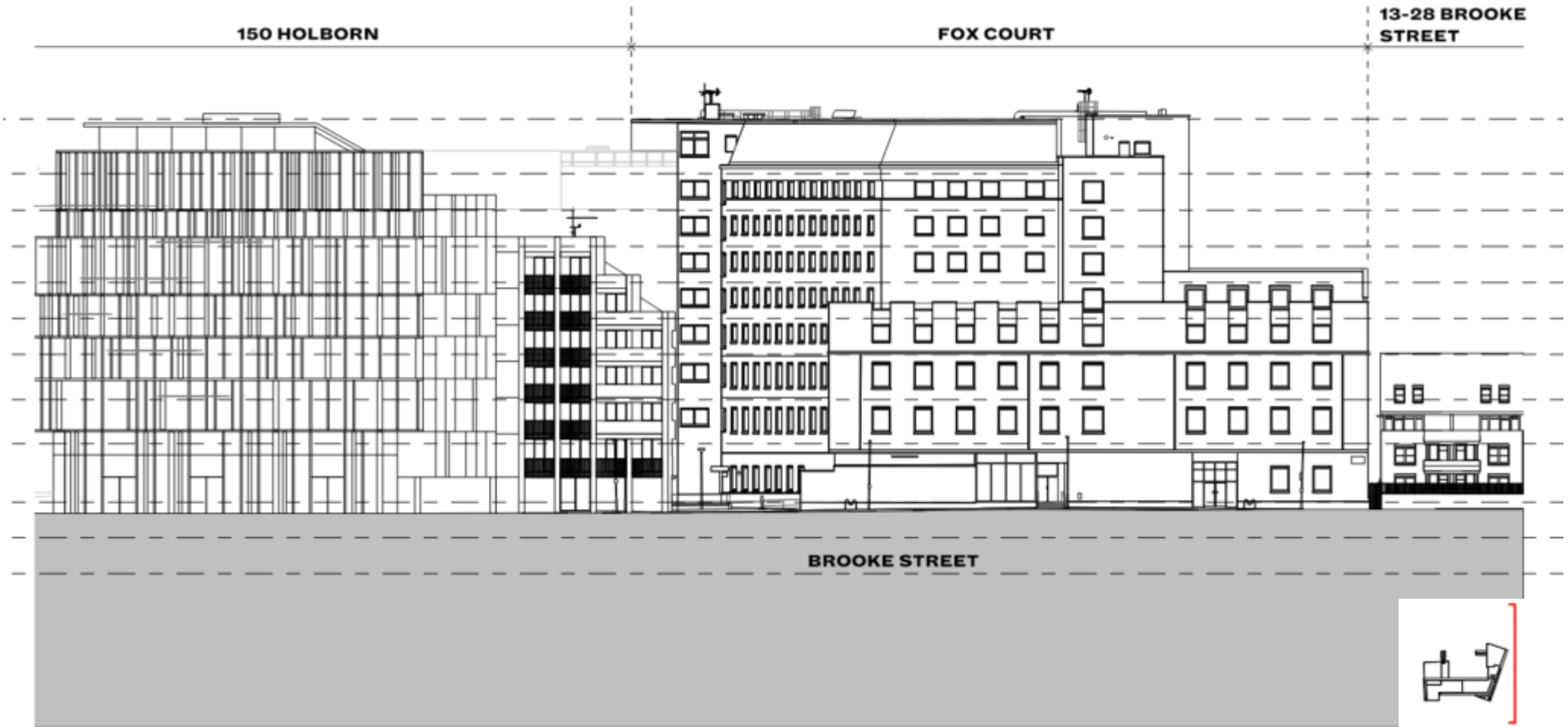
Site plan - existing



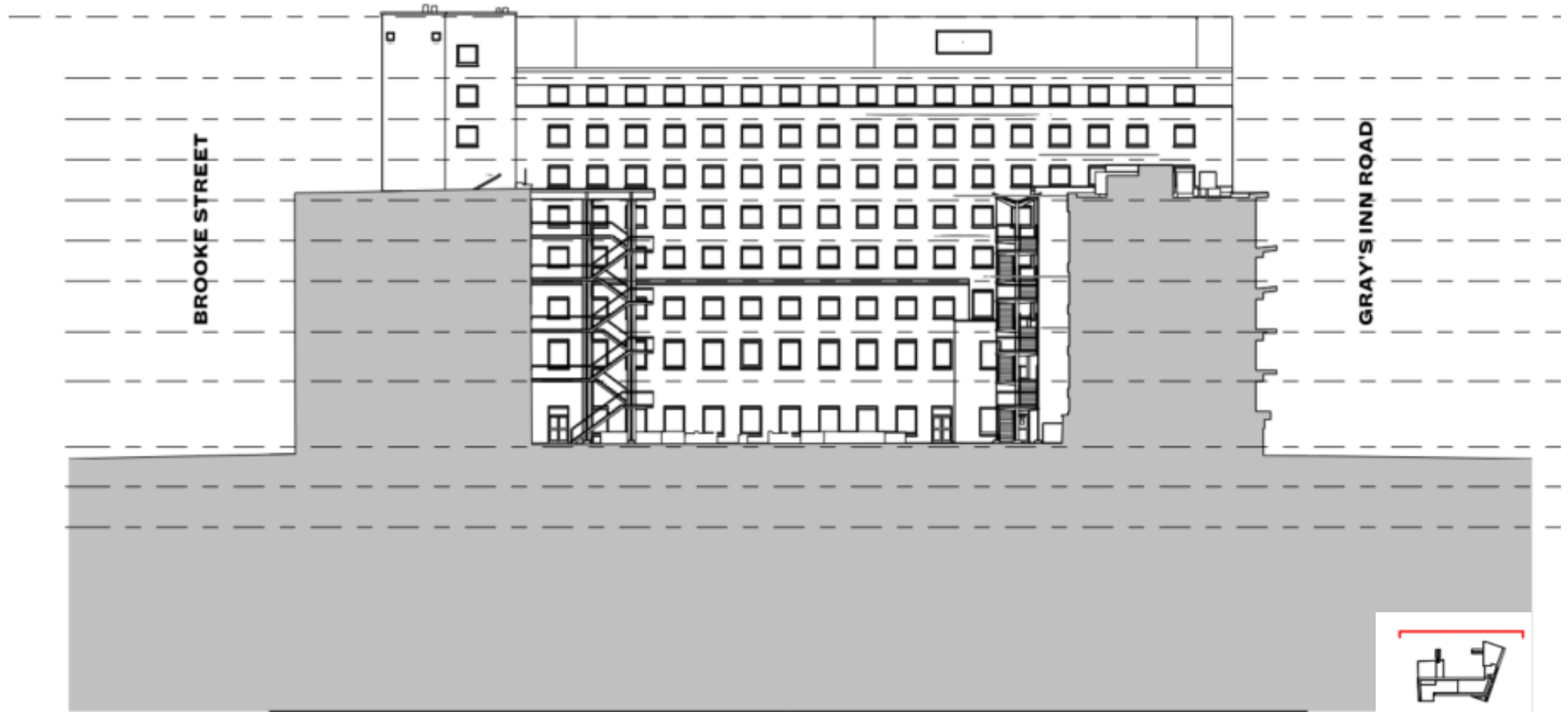
Gray's Inn Road – Existing Elevation



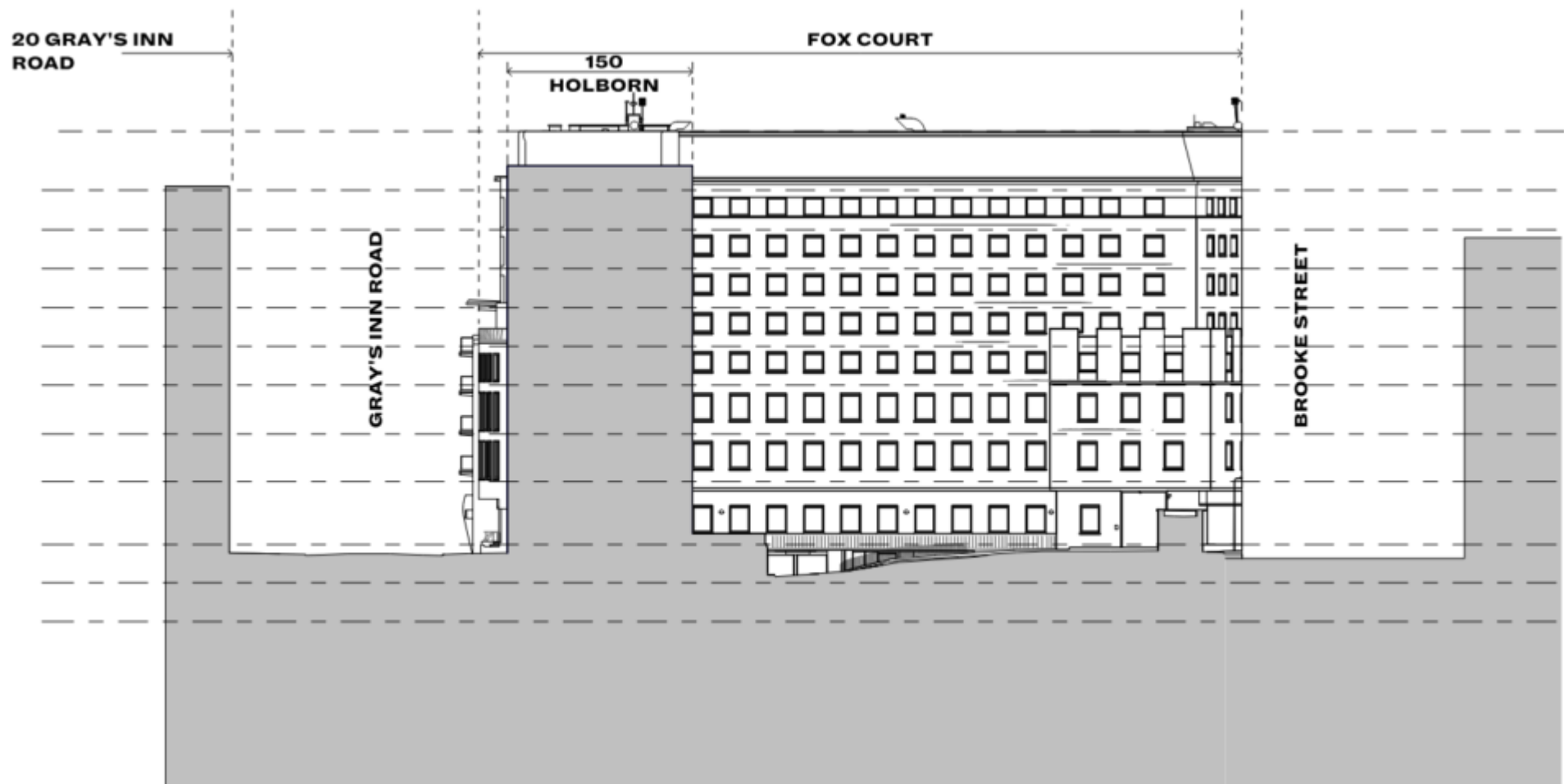
Brooke Street – Existing elevation



Northern elevation - existing



Southern elevation - Existing



Bird's eye view - existing



Heritage Designations



Street Views - existing



**West Facade -
Gray's Inn Road**



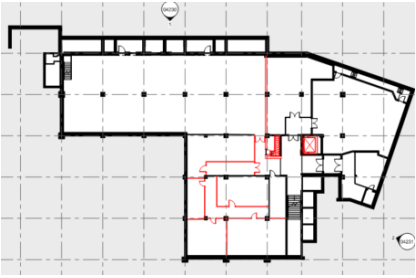
**North Facade -
Brookes Court**



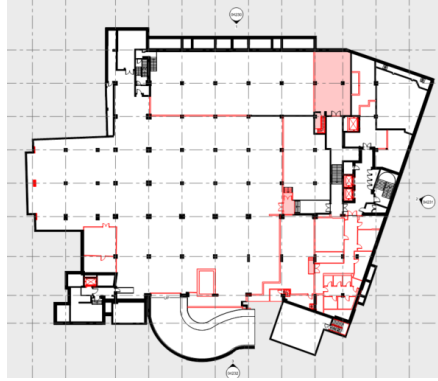
**North East Facade -
Brooke's Market**



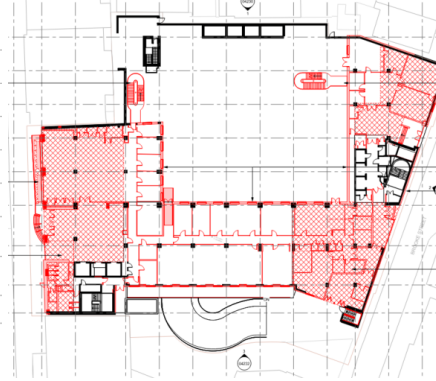
**South & East Facade -
Brooke Street**



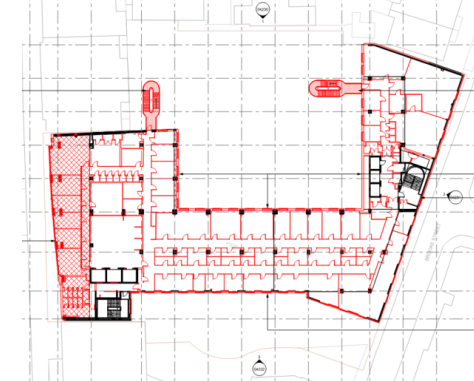
Basement 02



Basement 01



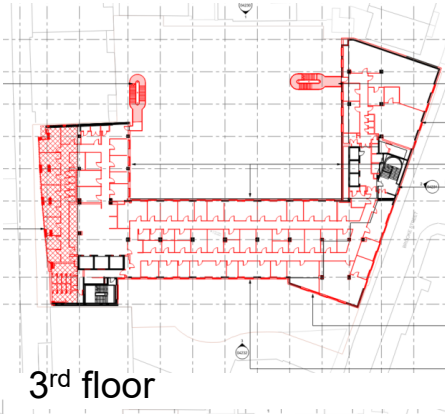
Ground floor



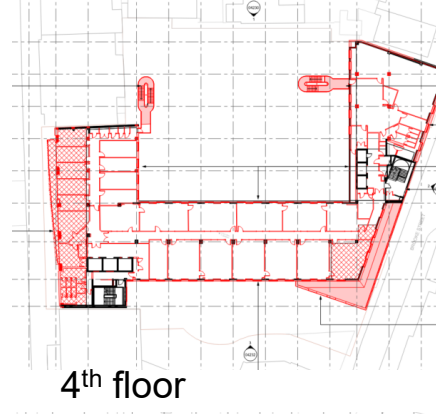
1st floor



2nd floor



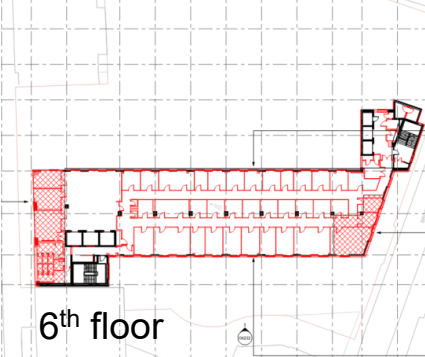
3rd floor



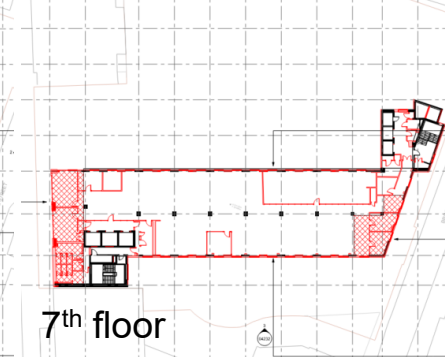
4th floor



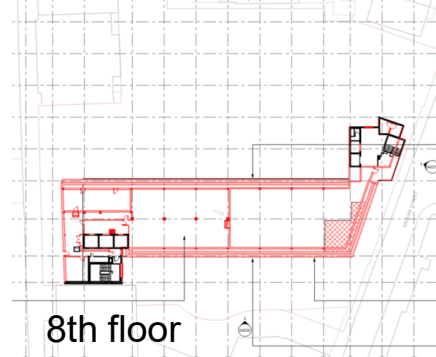
5th floor



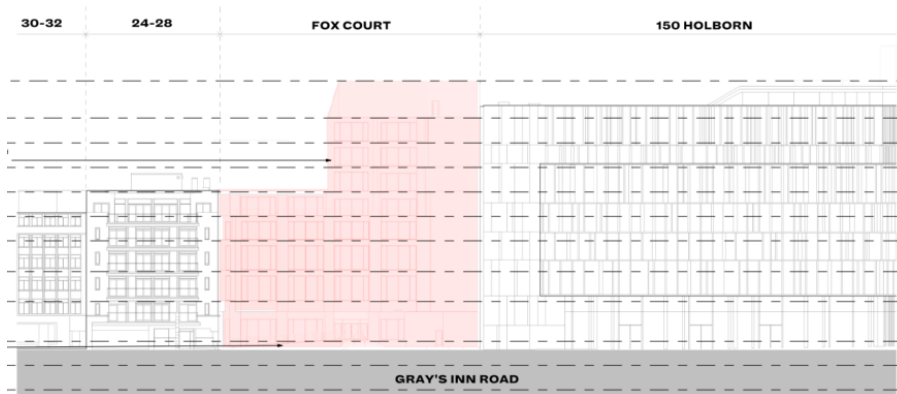
6th floor



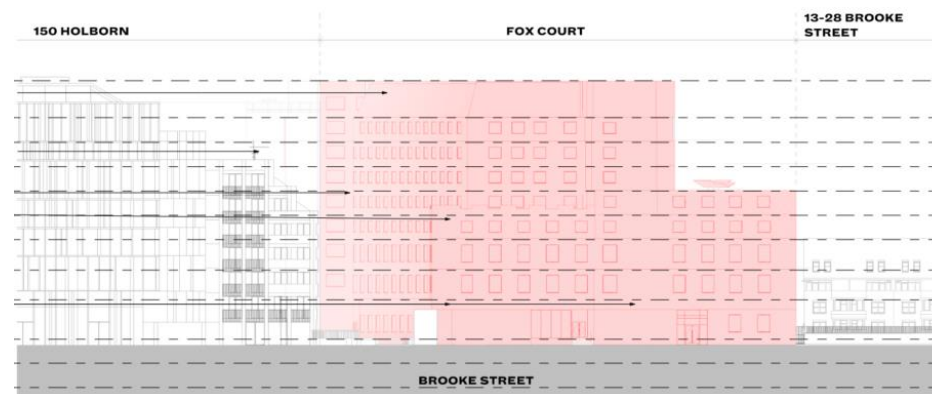
7th floor



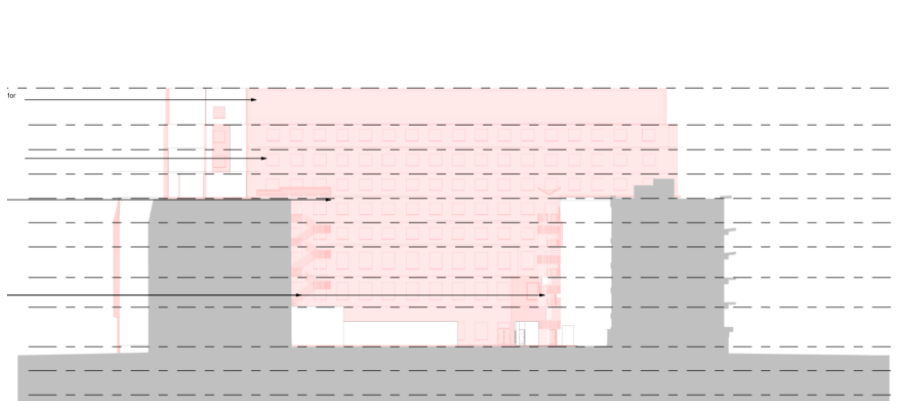
8th floor



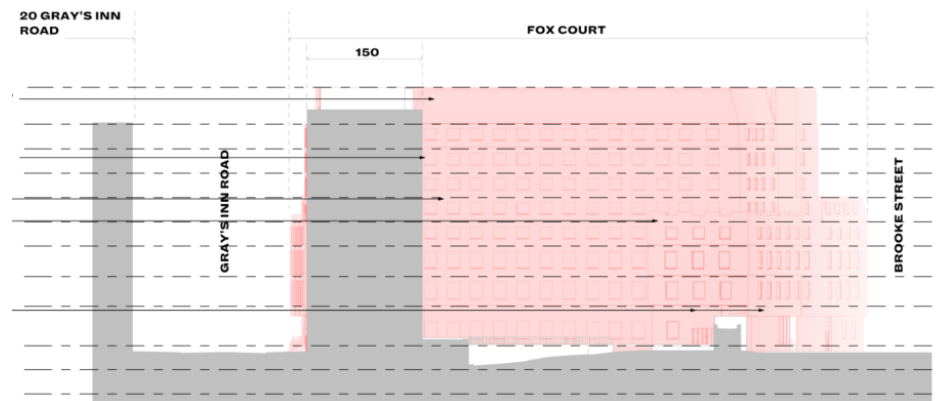
Gray's Inn Road elevation



Brookes Street elevation

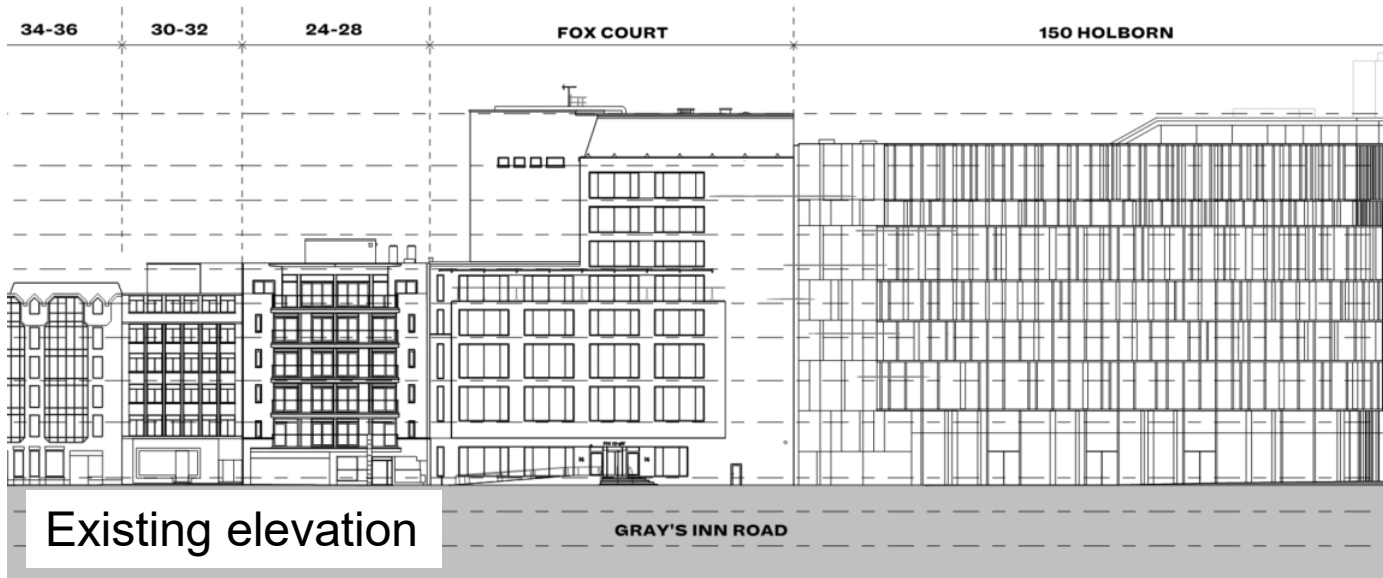


North elevation

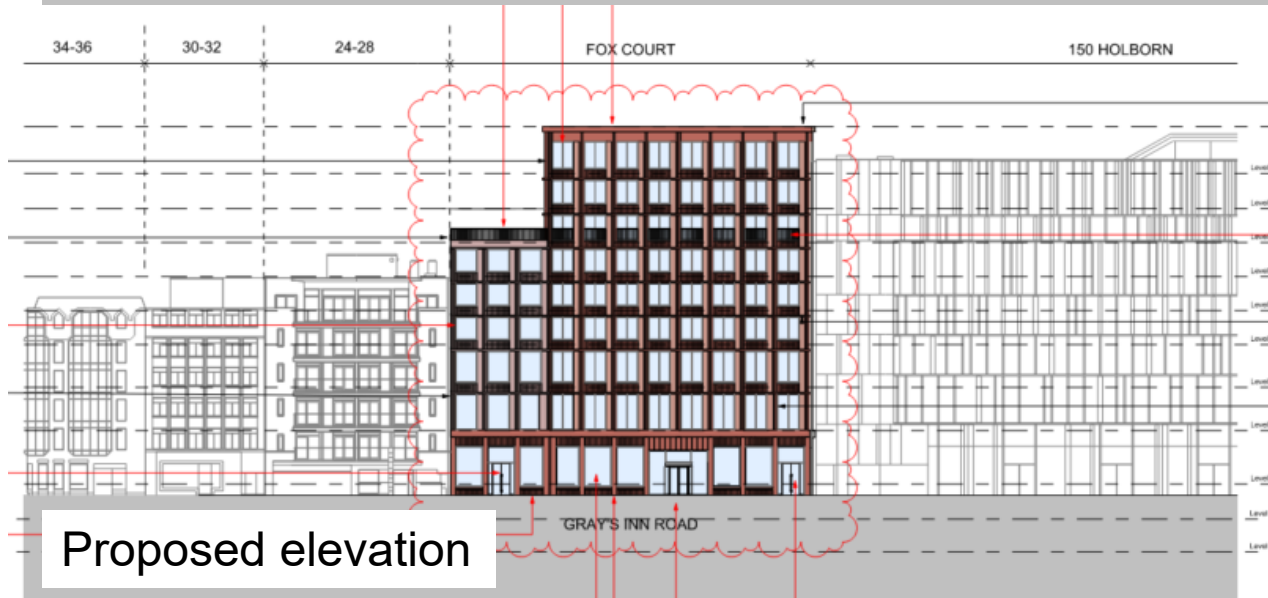


South elevation

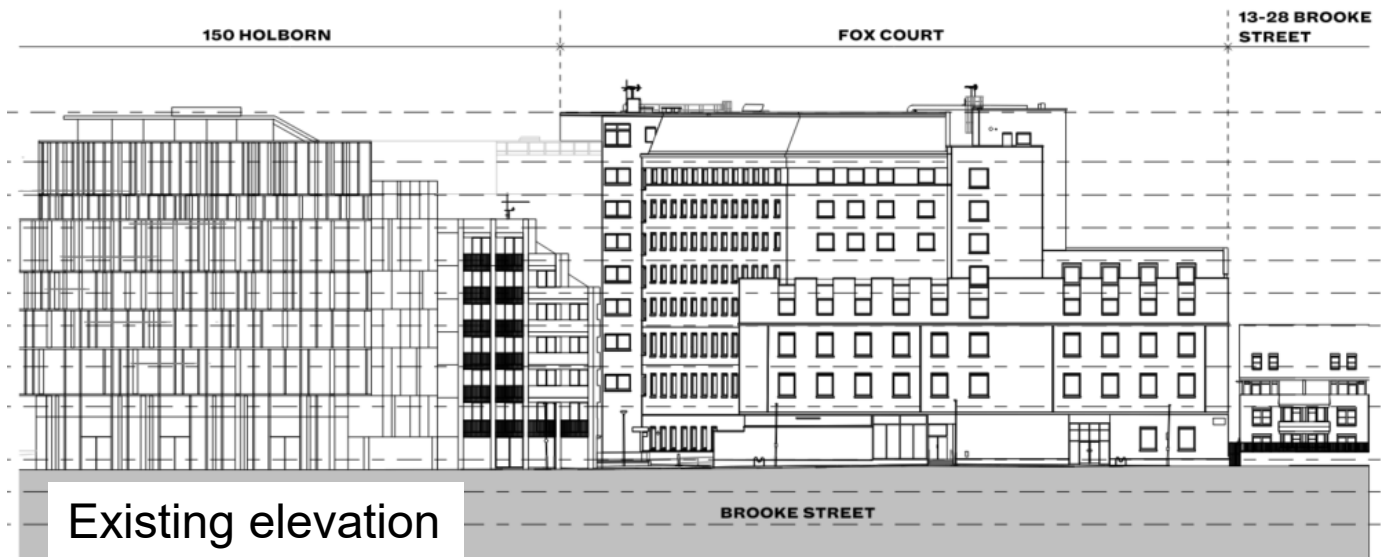


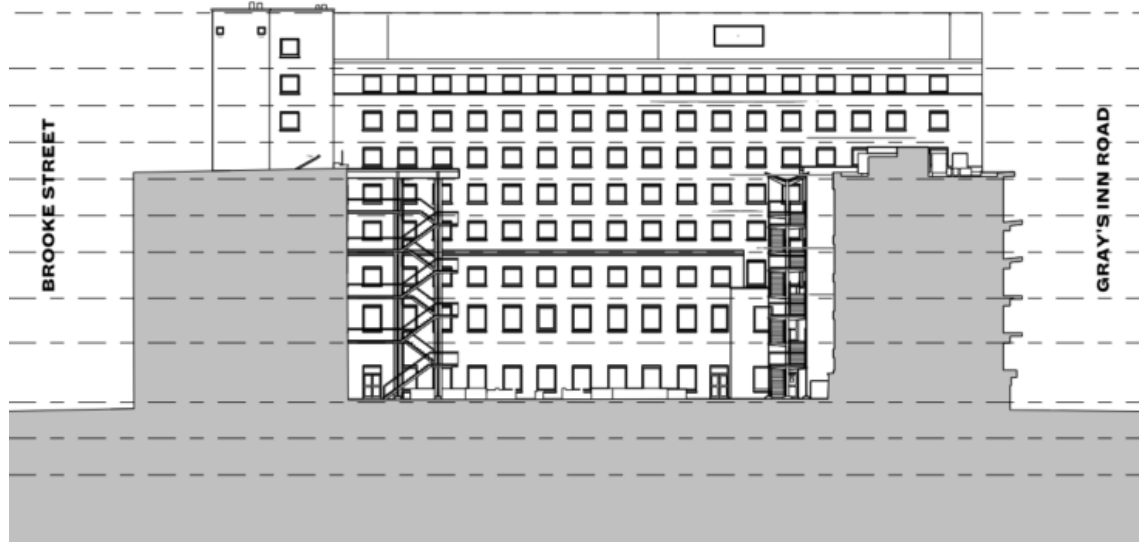


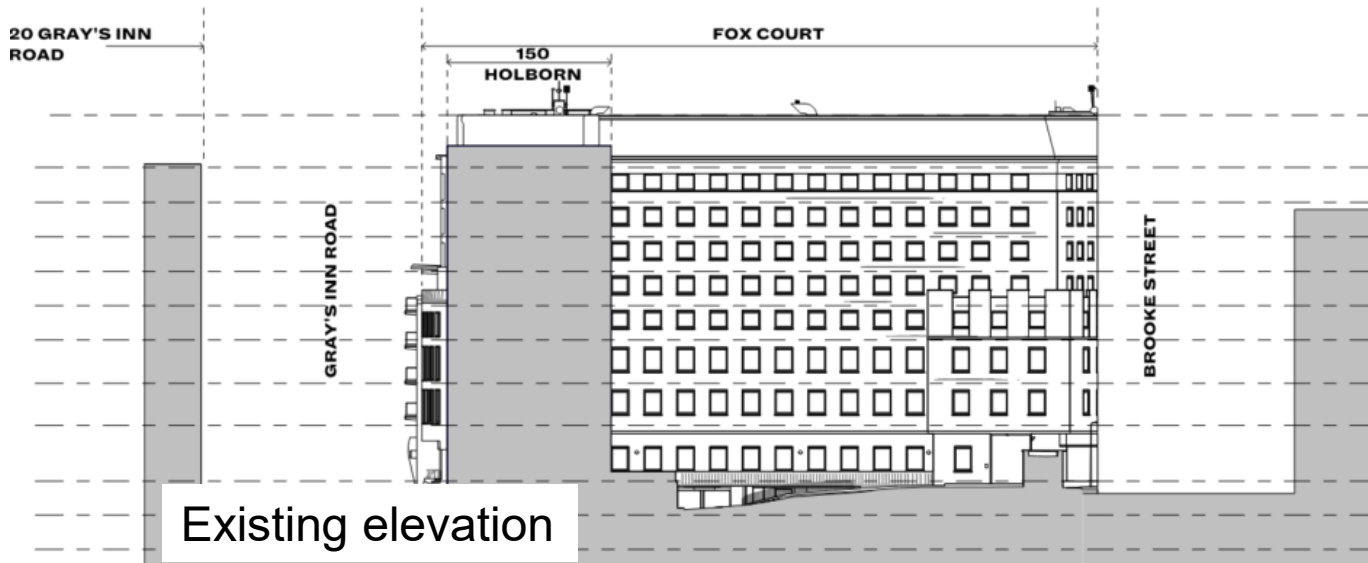
Existing elevation



Proposed elevation



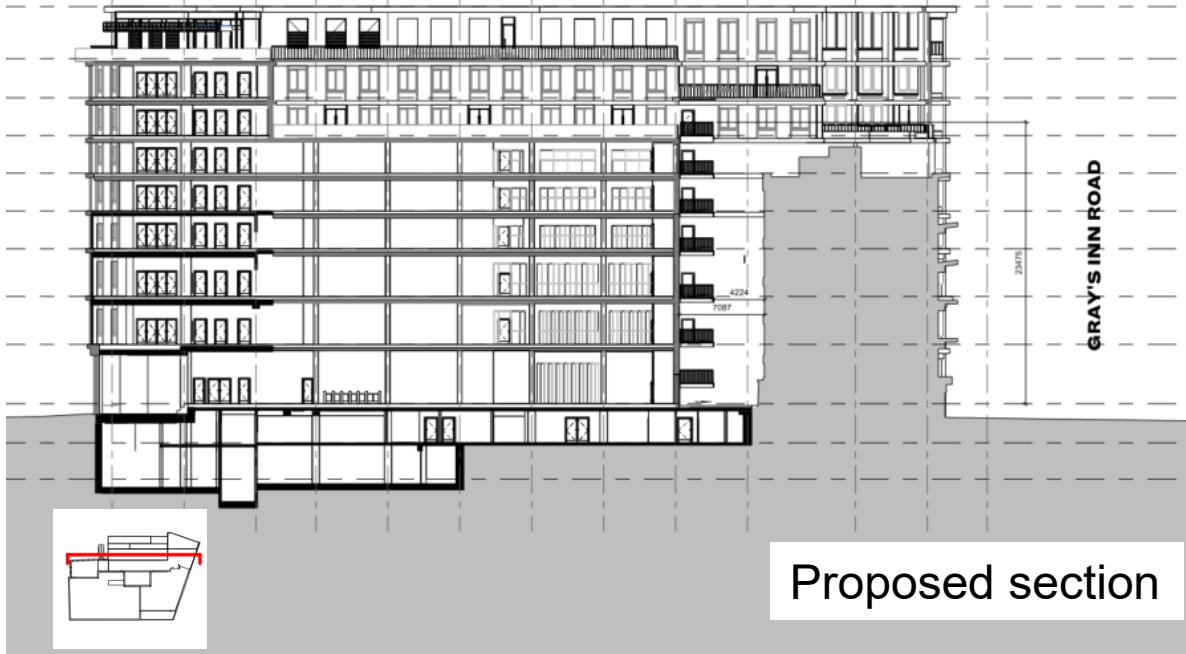
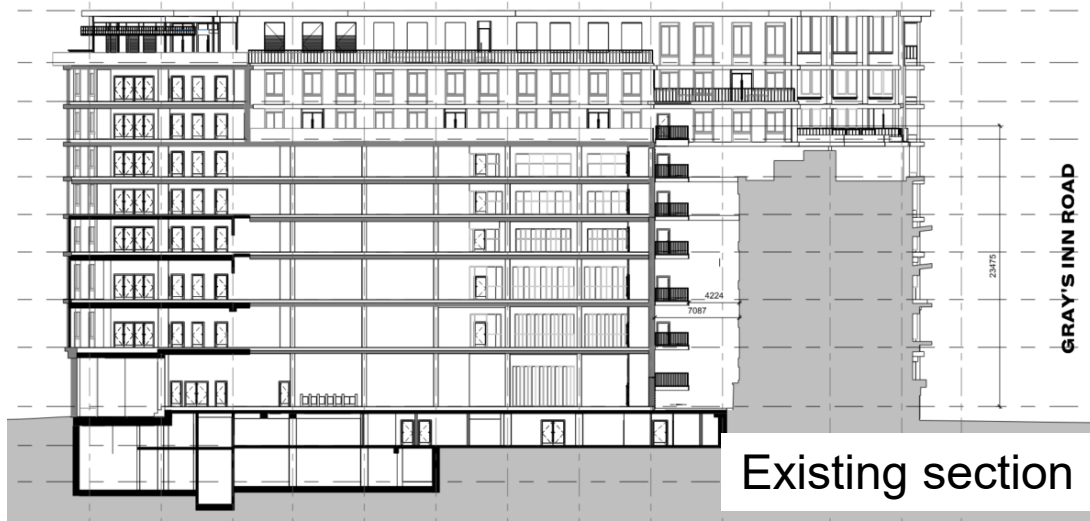


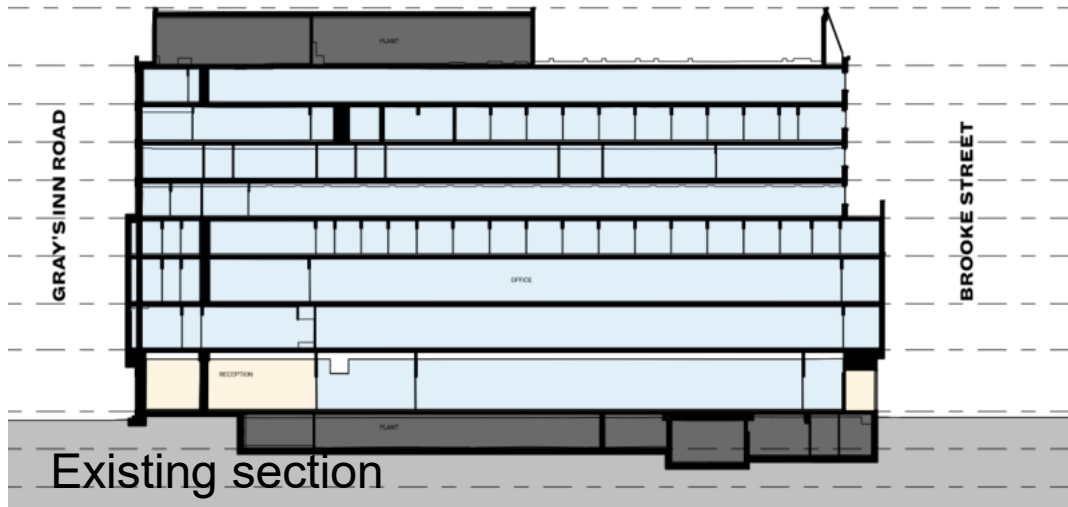


Existing elevation

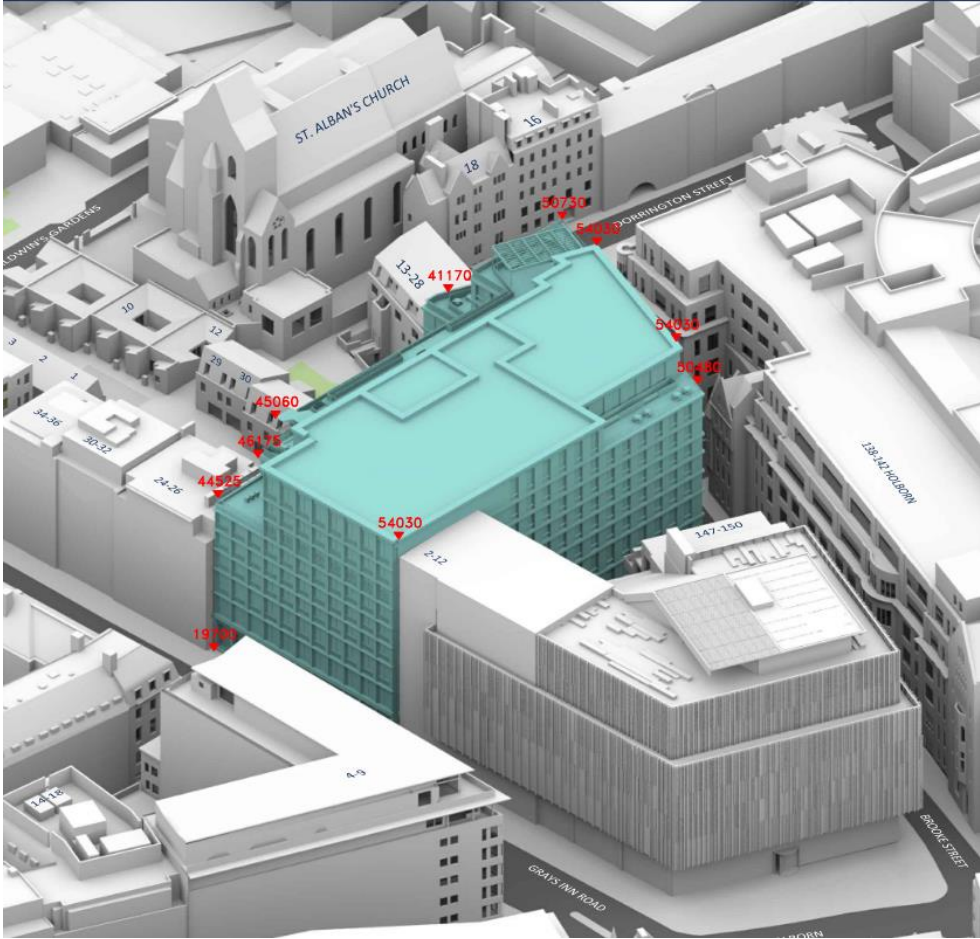
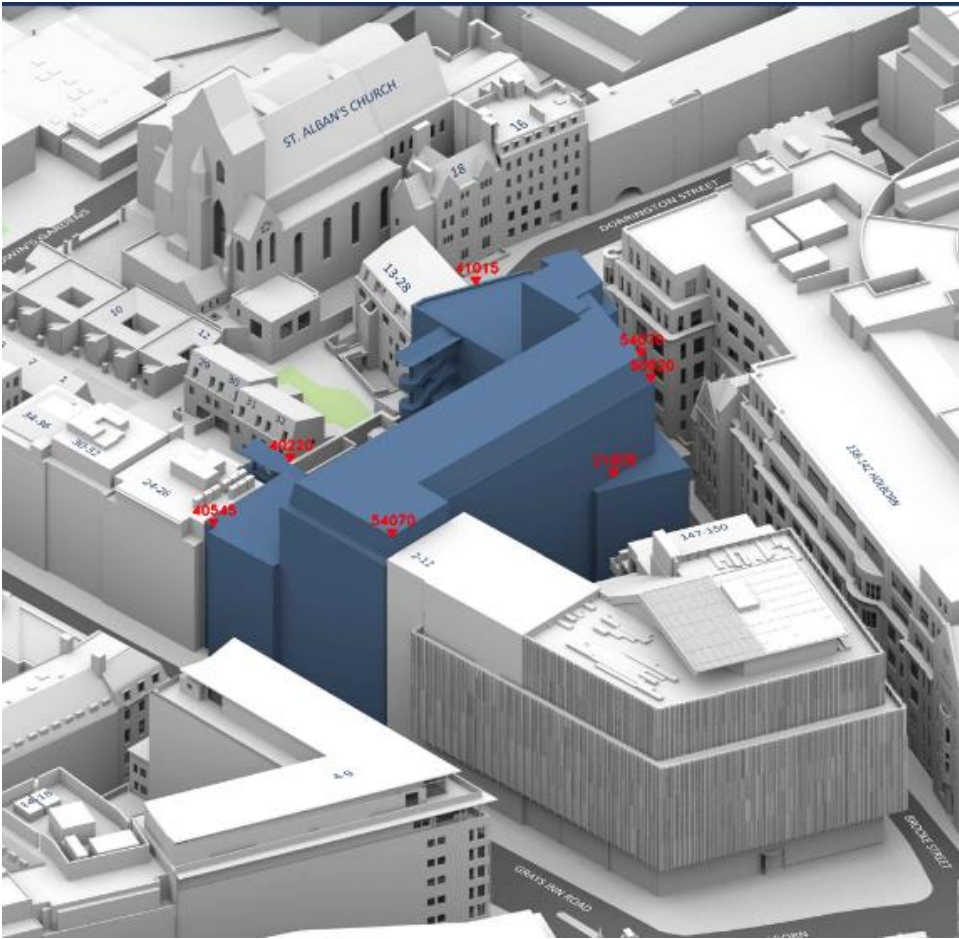


Proposed elevation

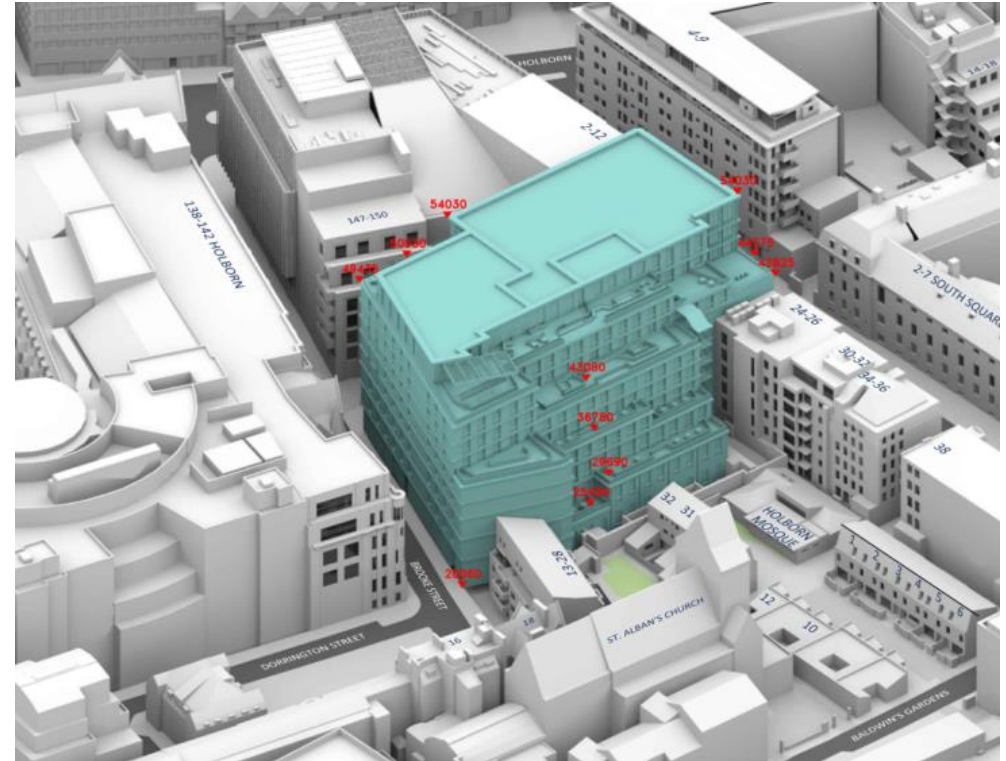
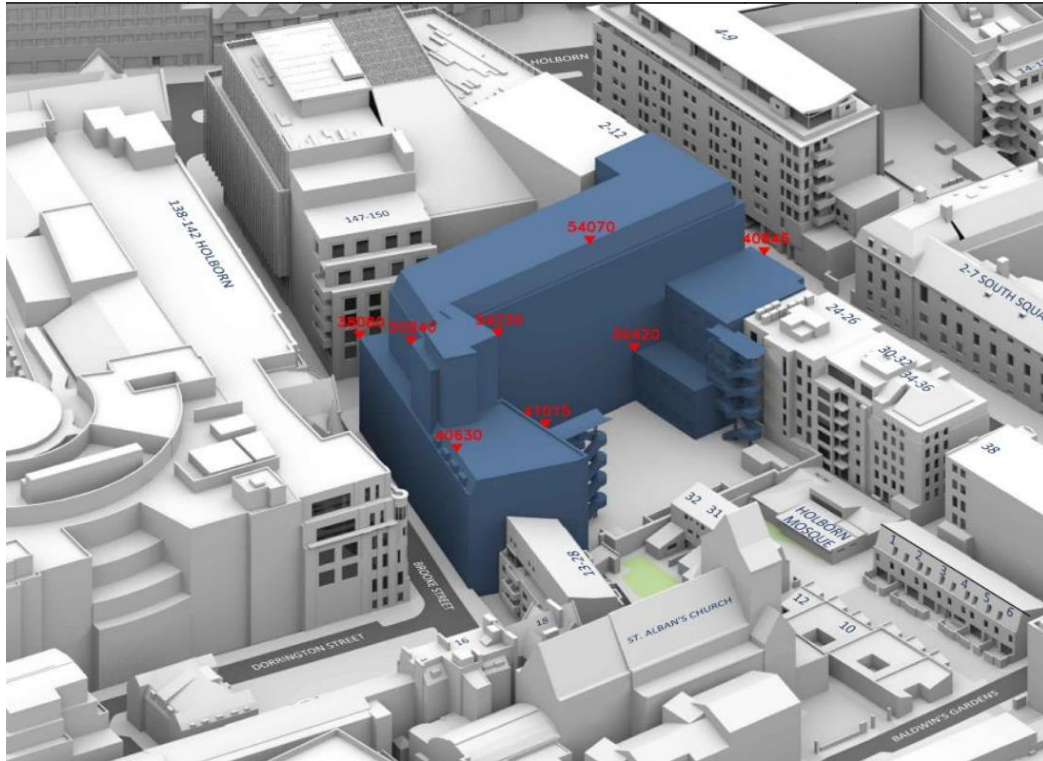




3D view – Existing and proposed looking northeast

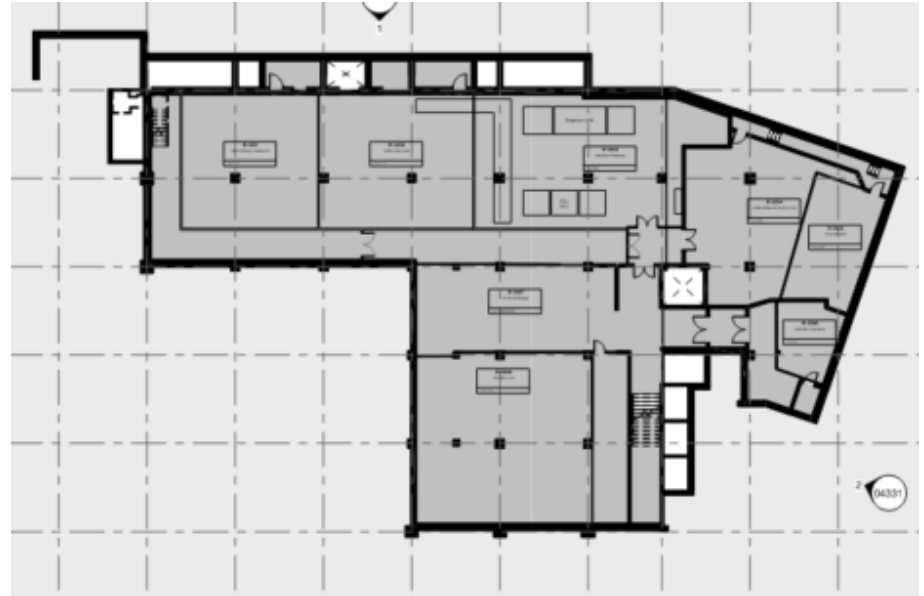


3D View – Existing and proposed looking south

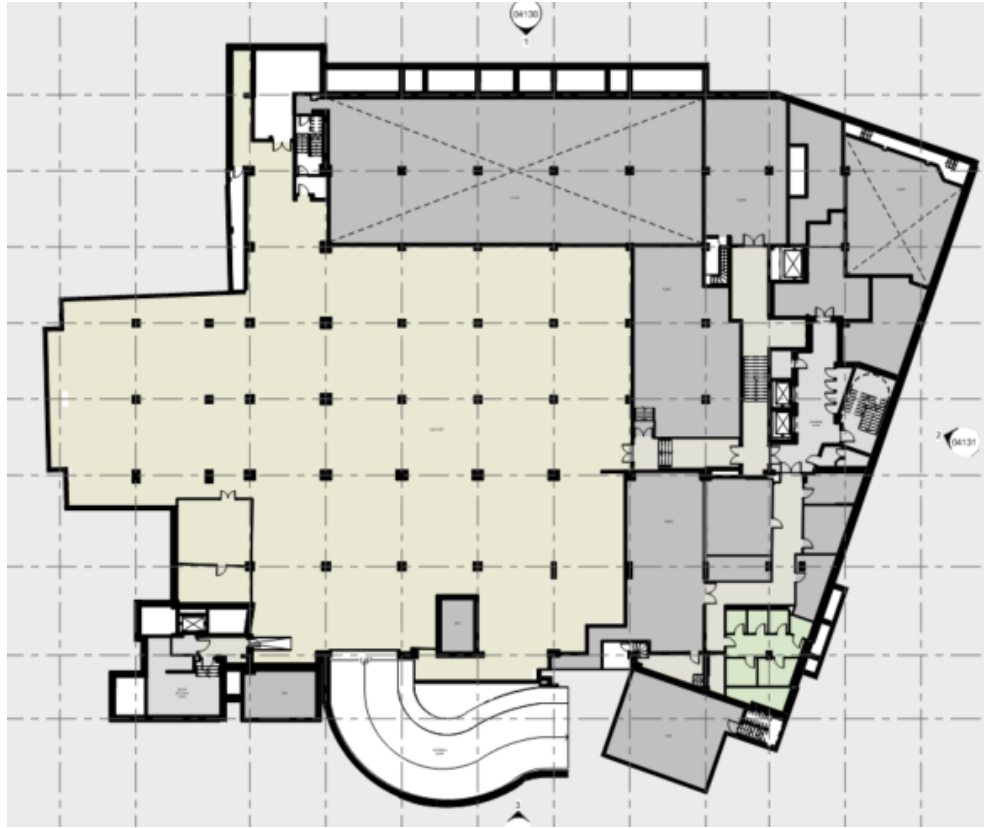




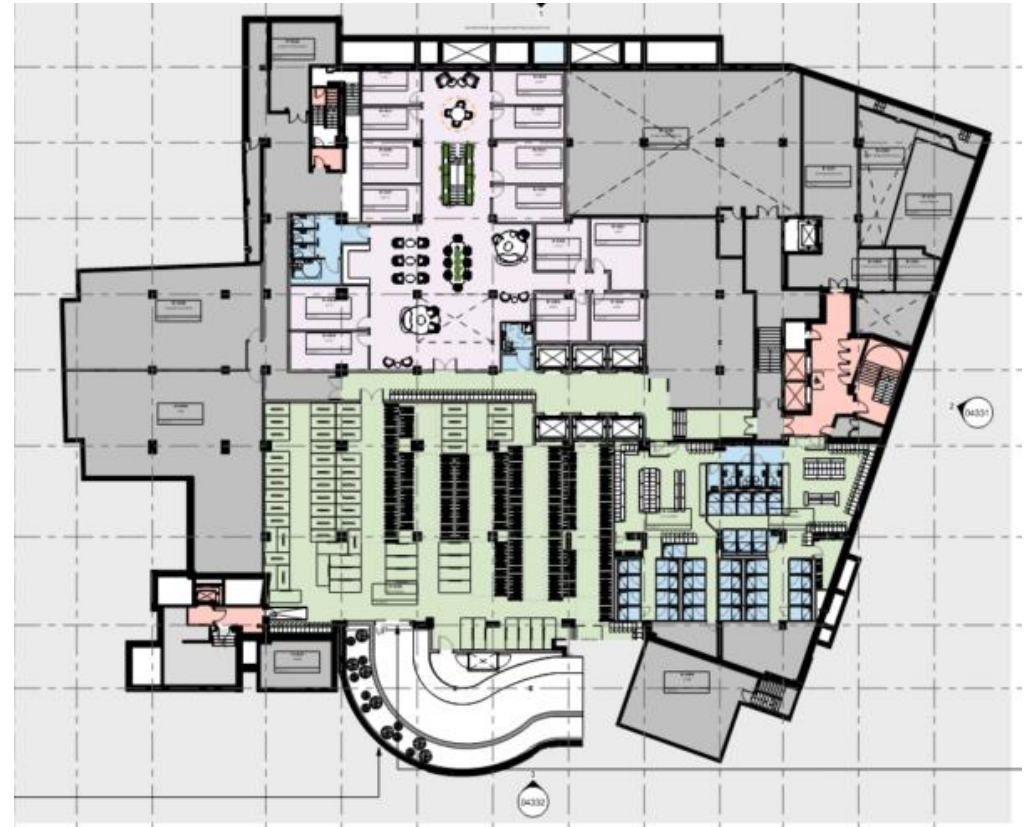
Existing basement 02



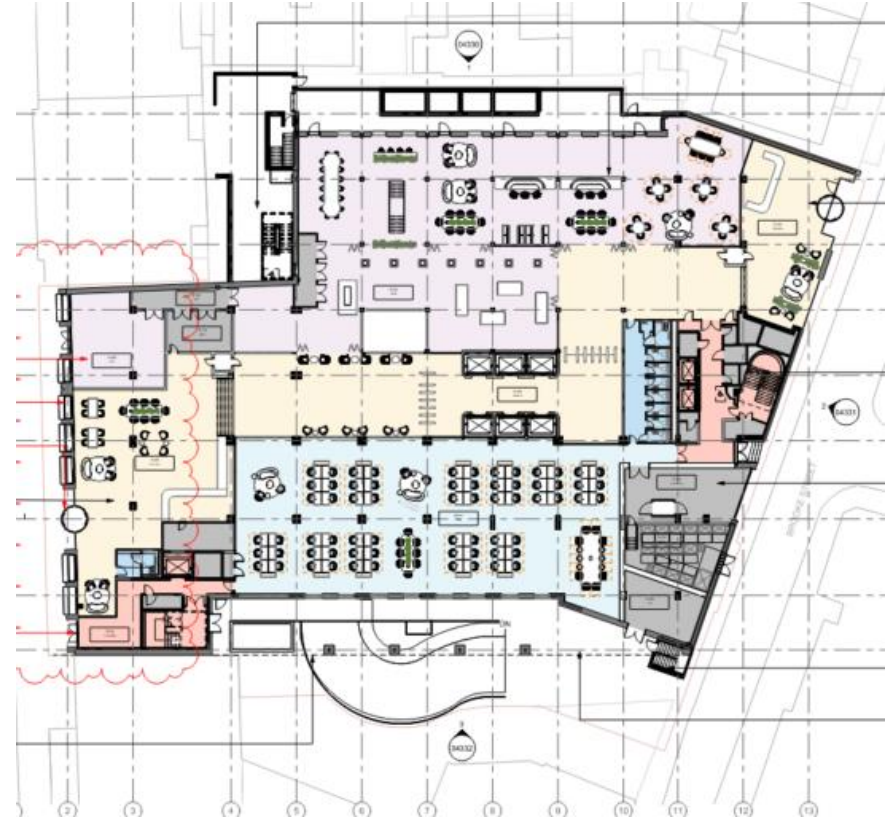
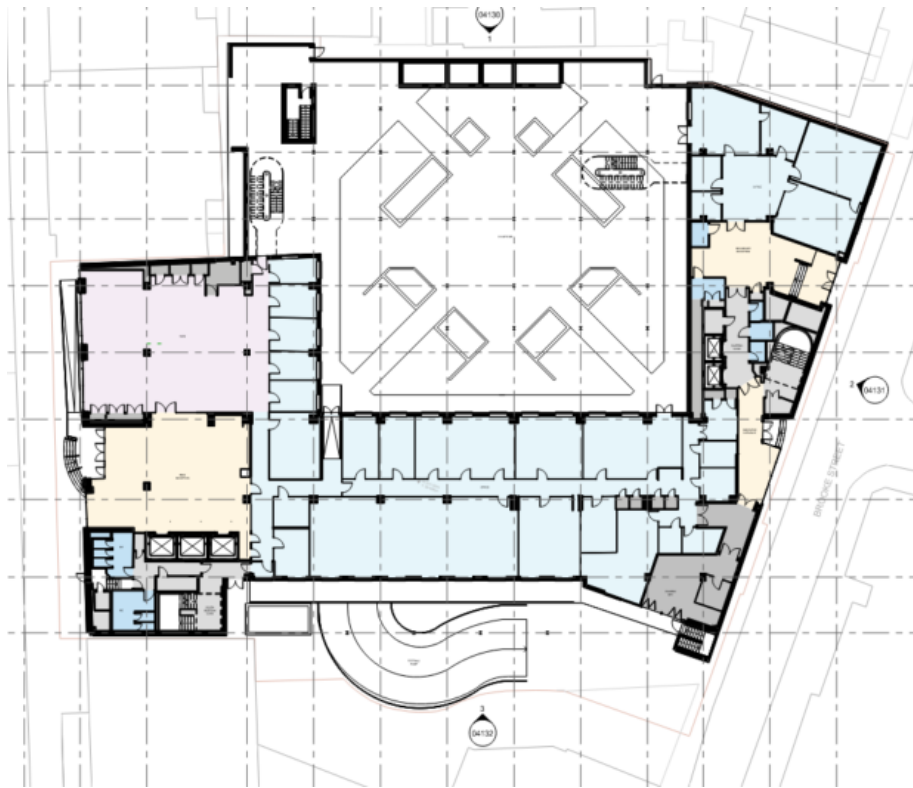
Proposed basement 02

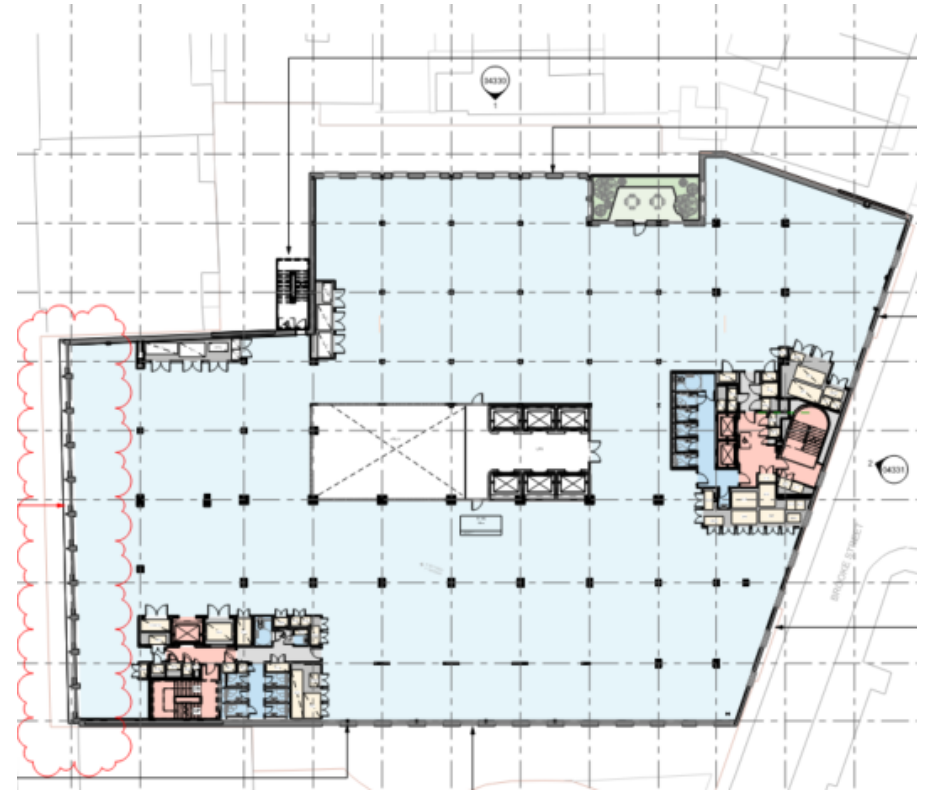
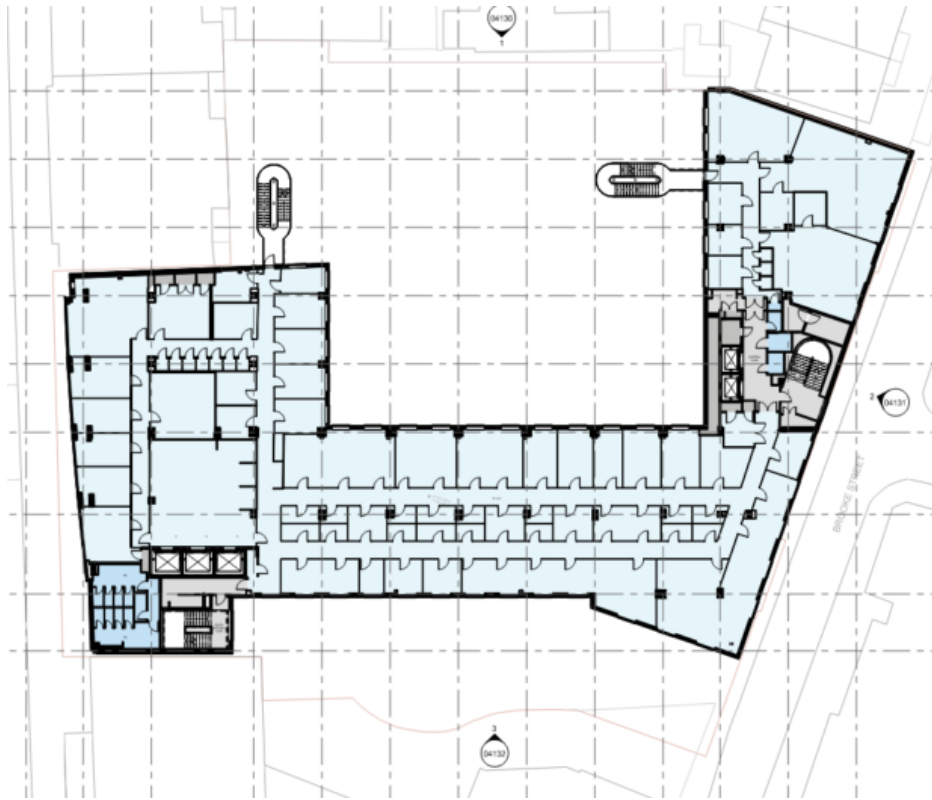


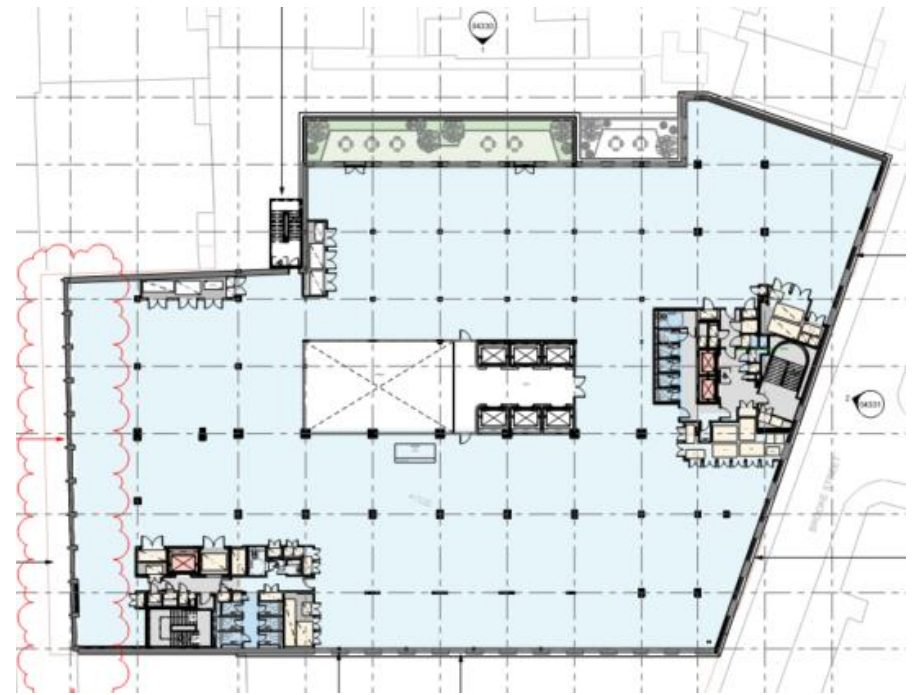
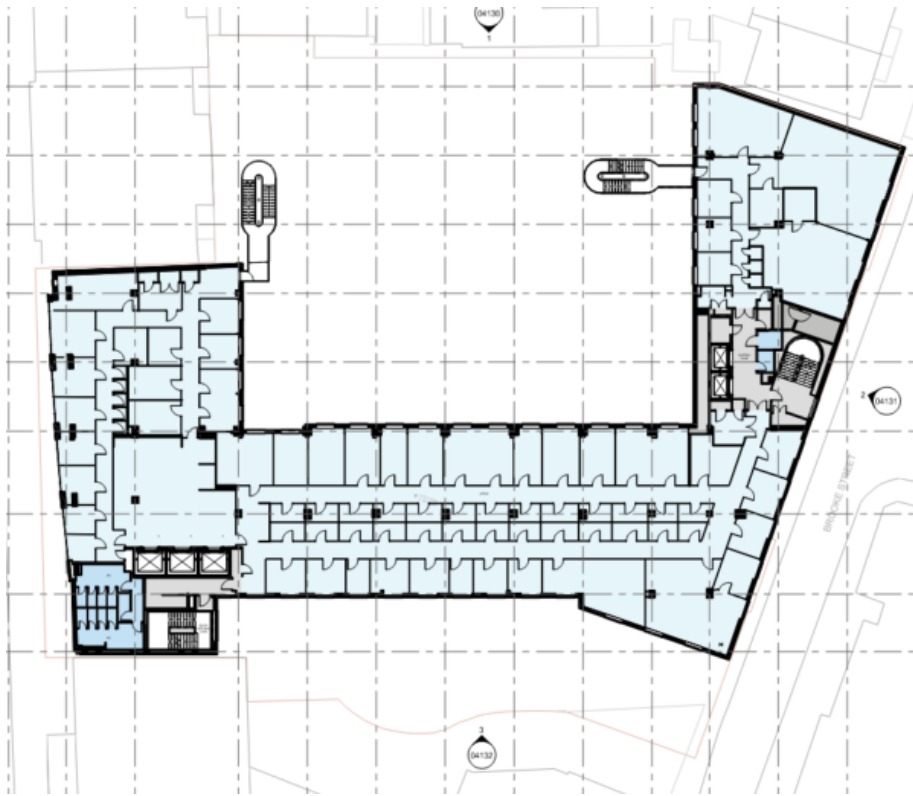
Existing basement 01

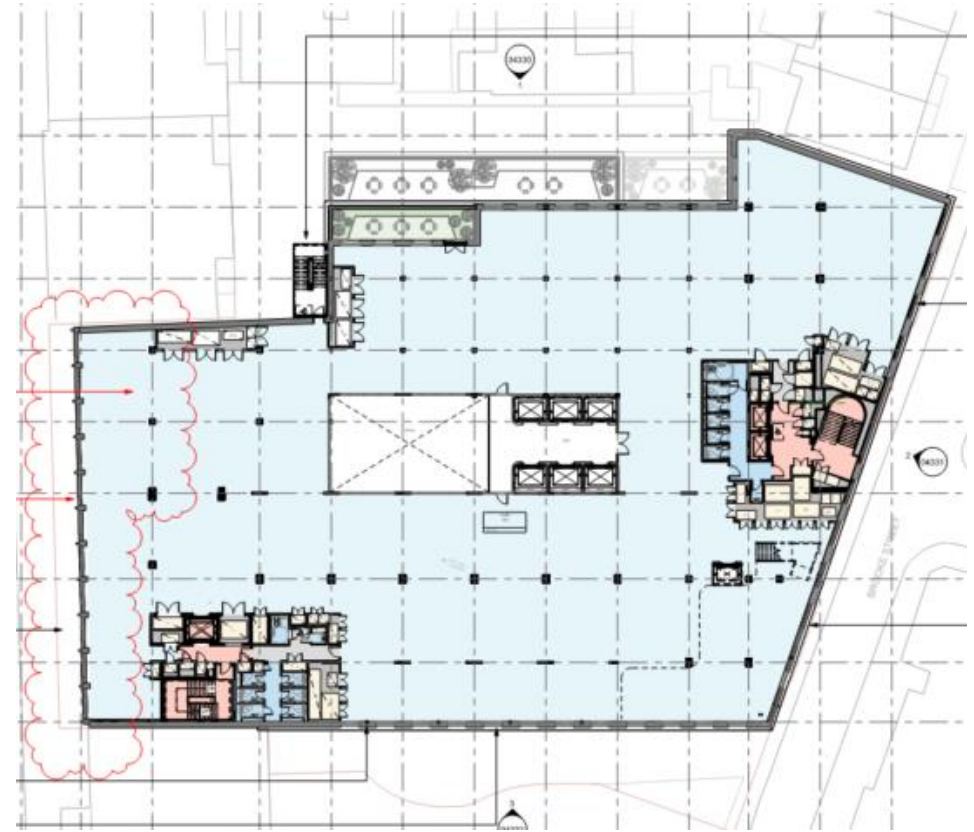
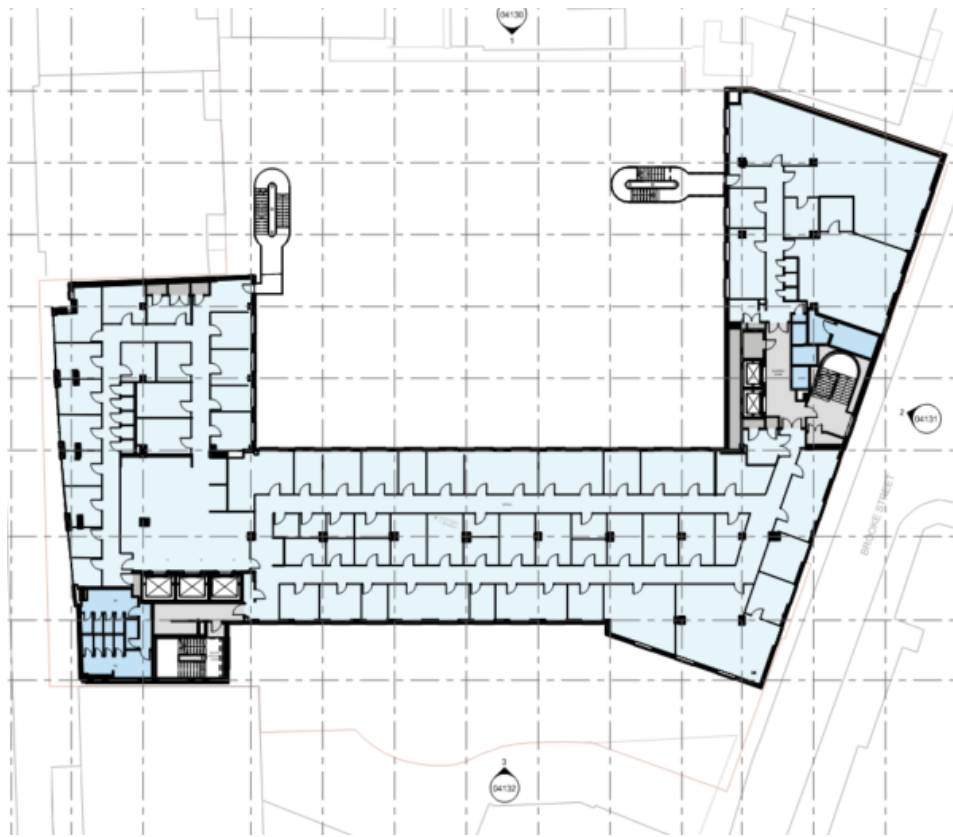


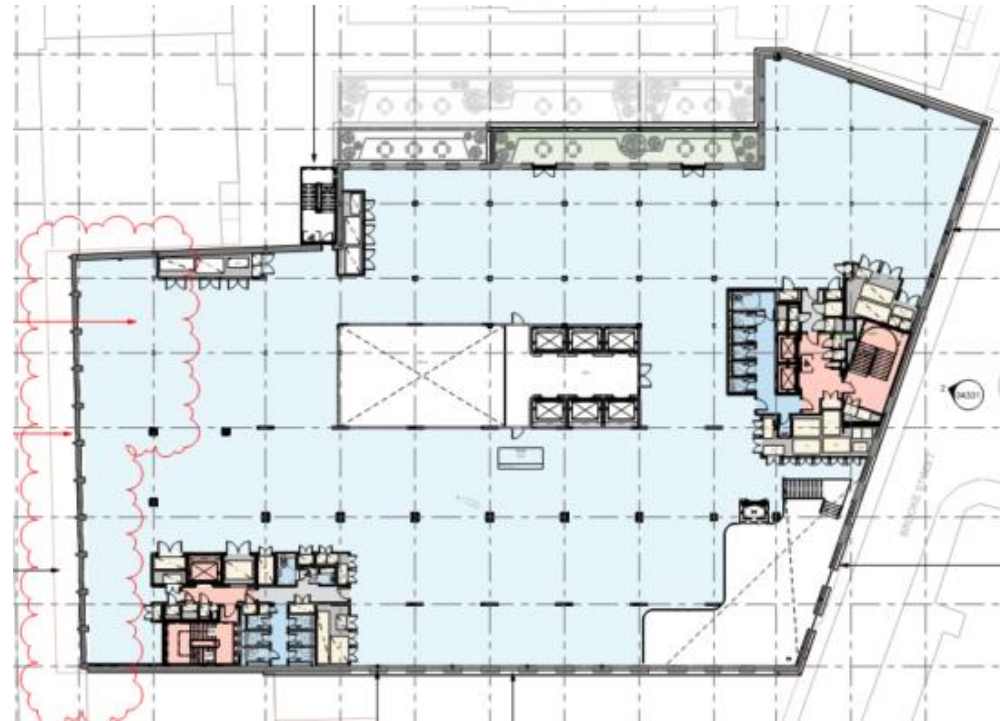
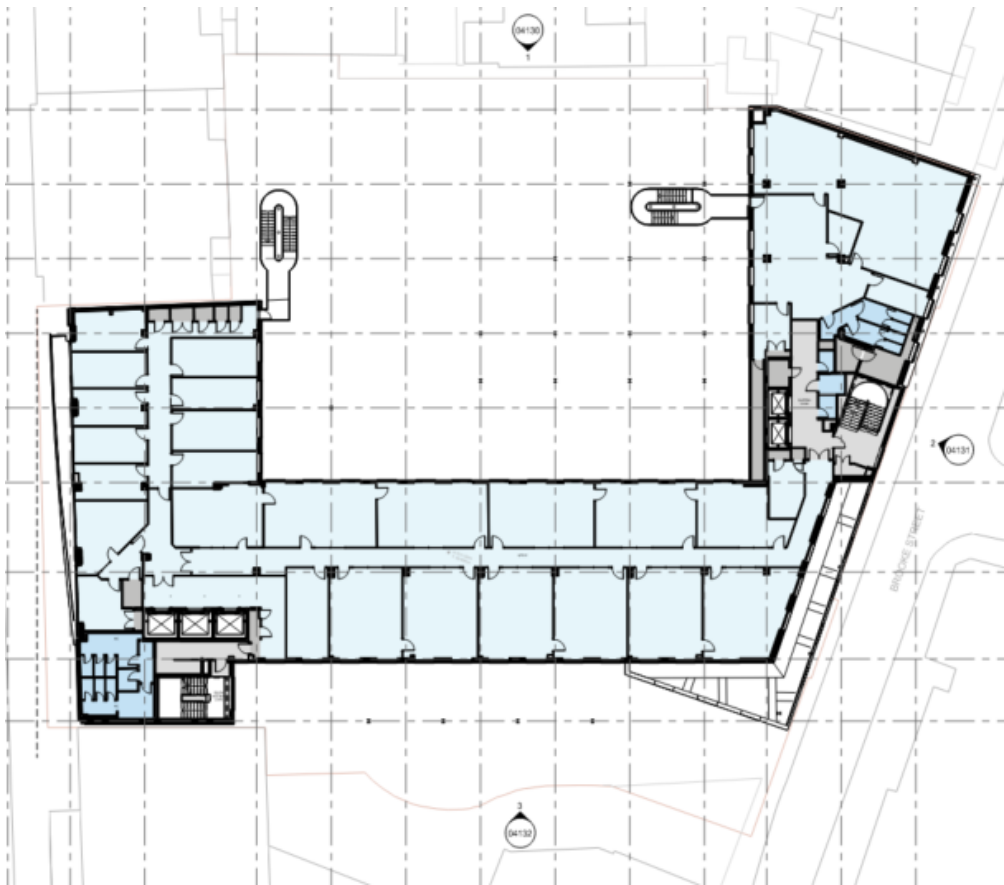
Proposed basement 01

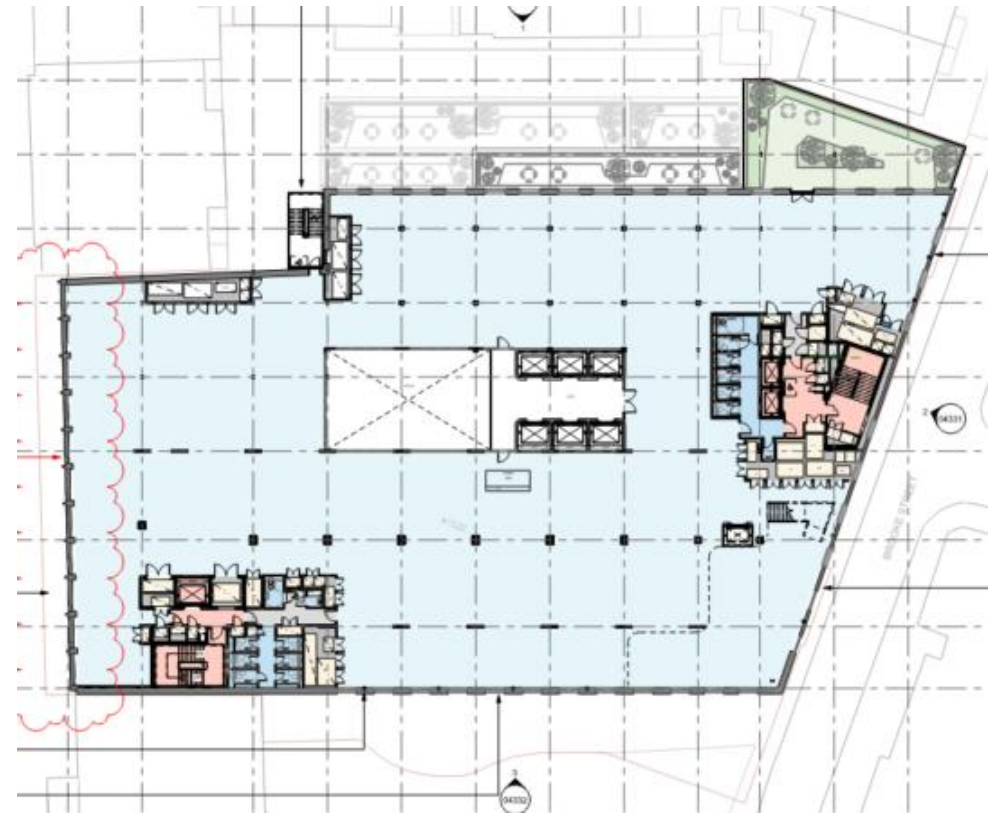
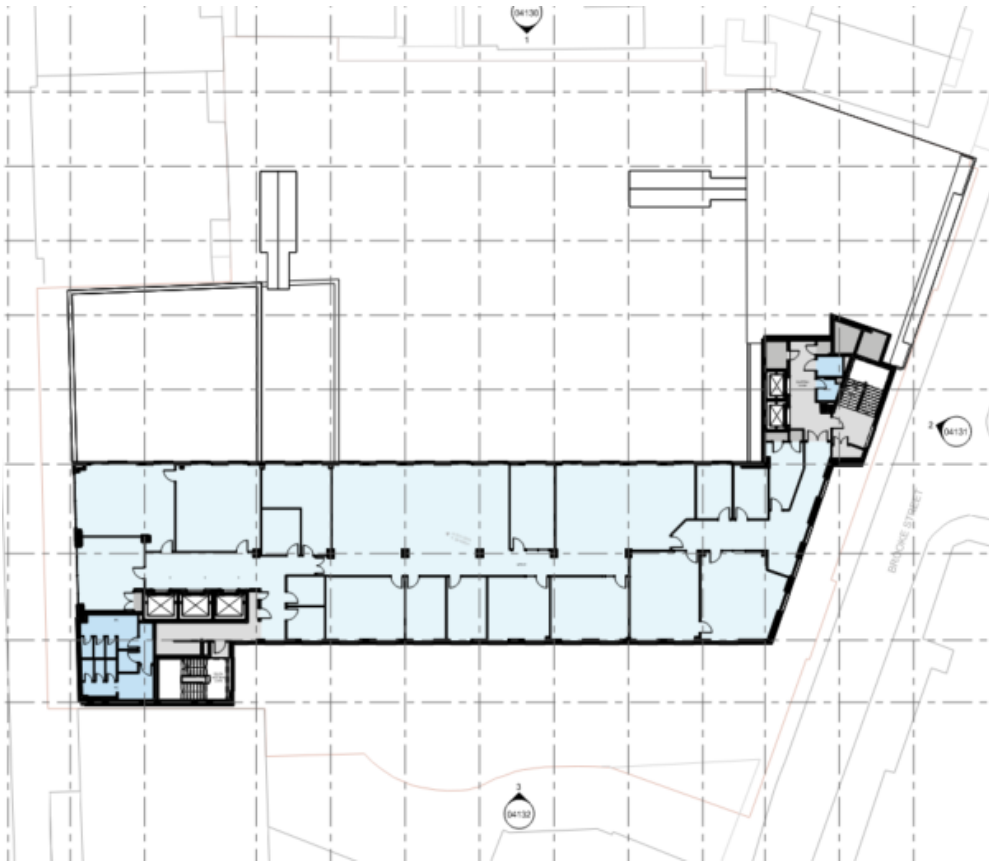


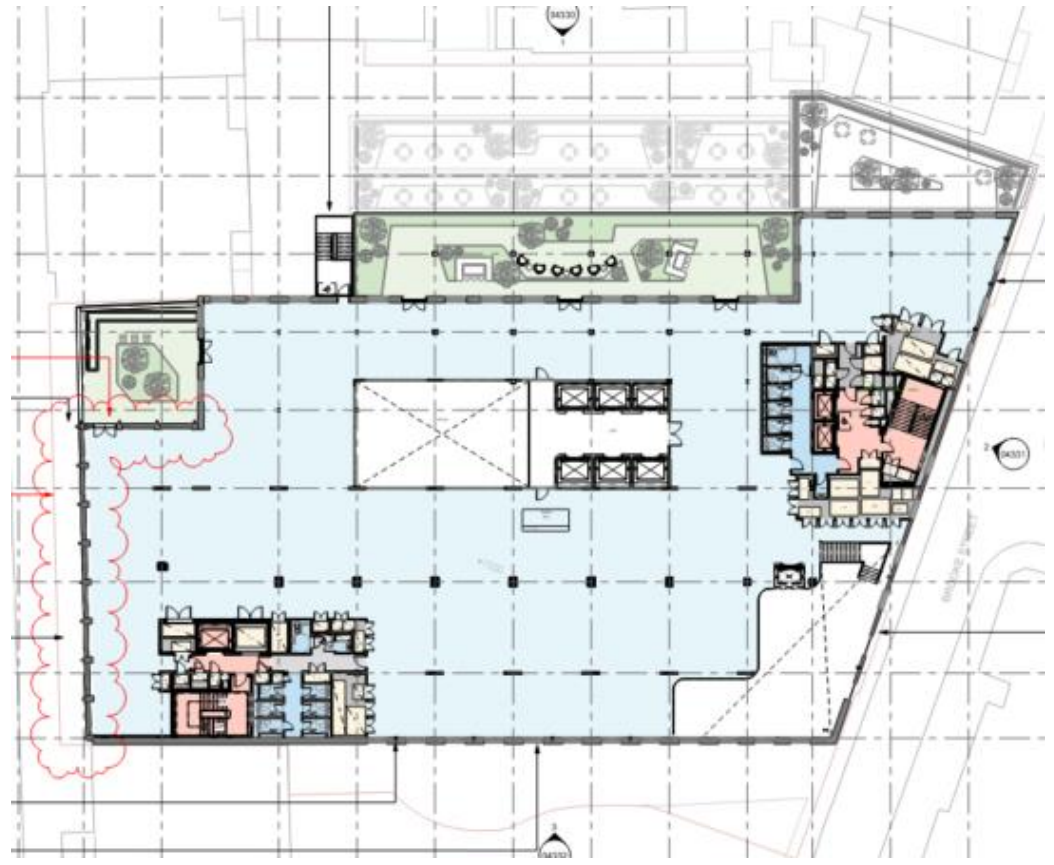
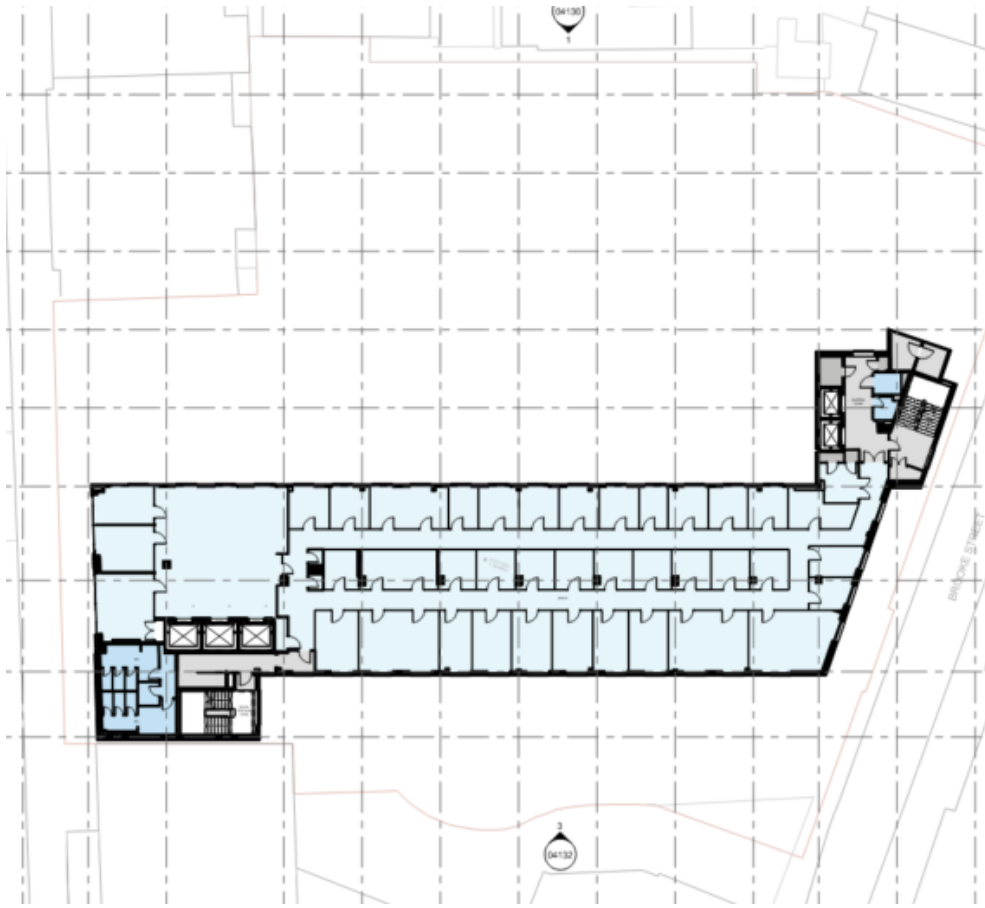


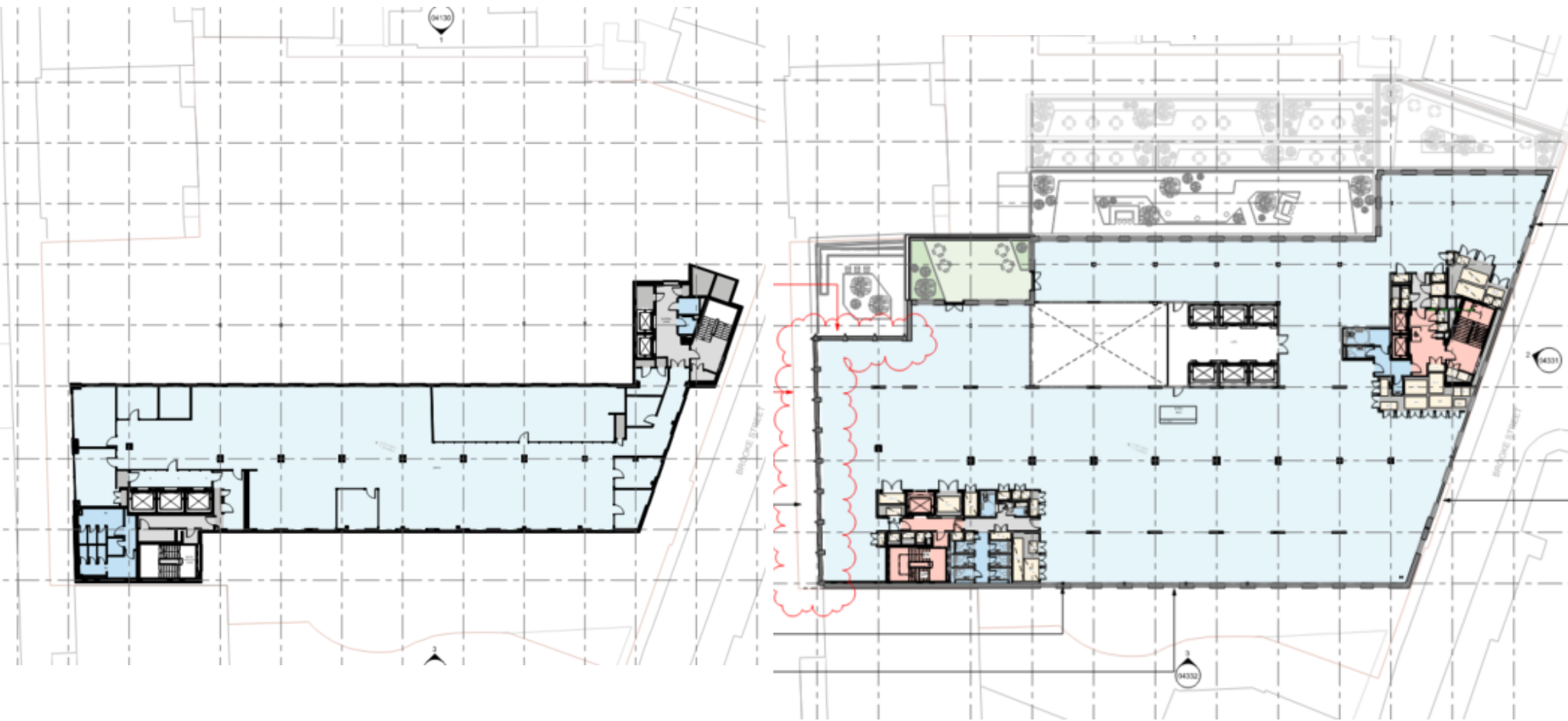


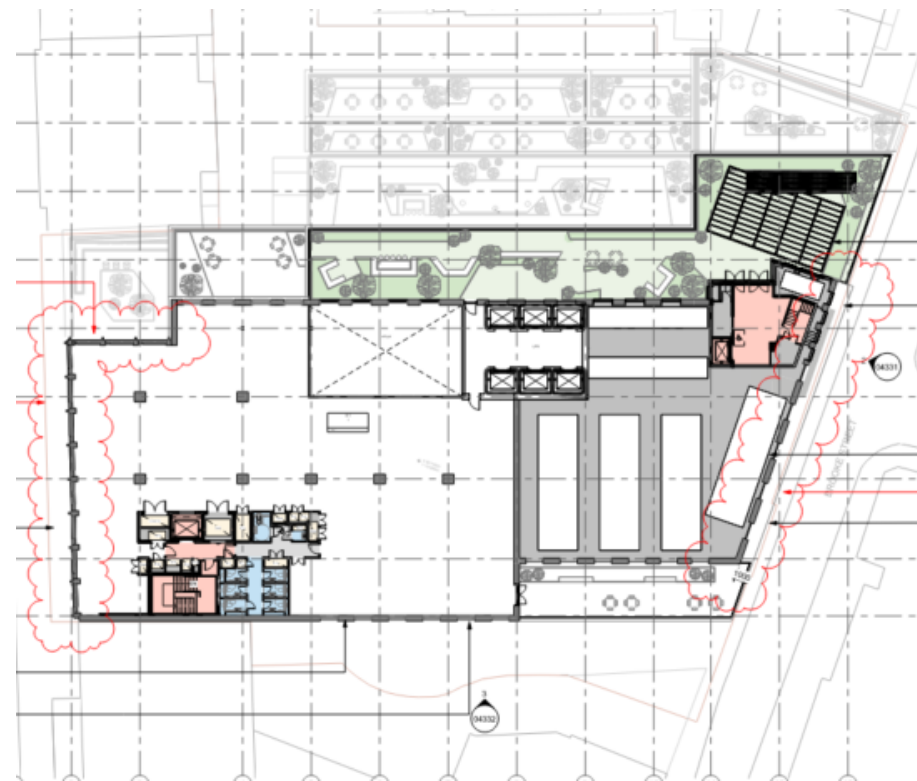
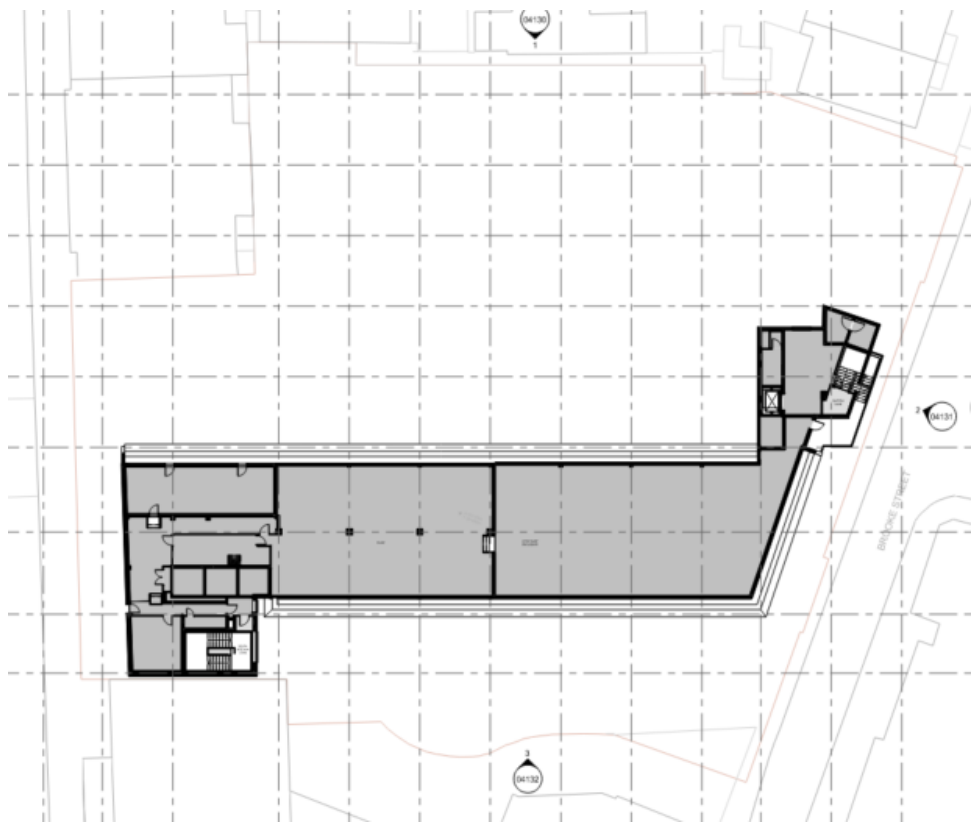


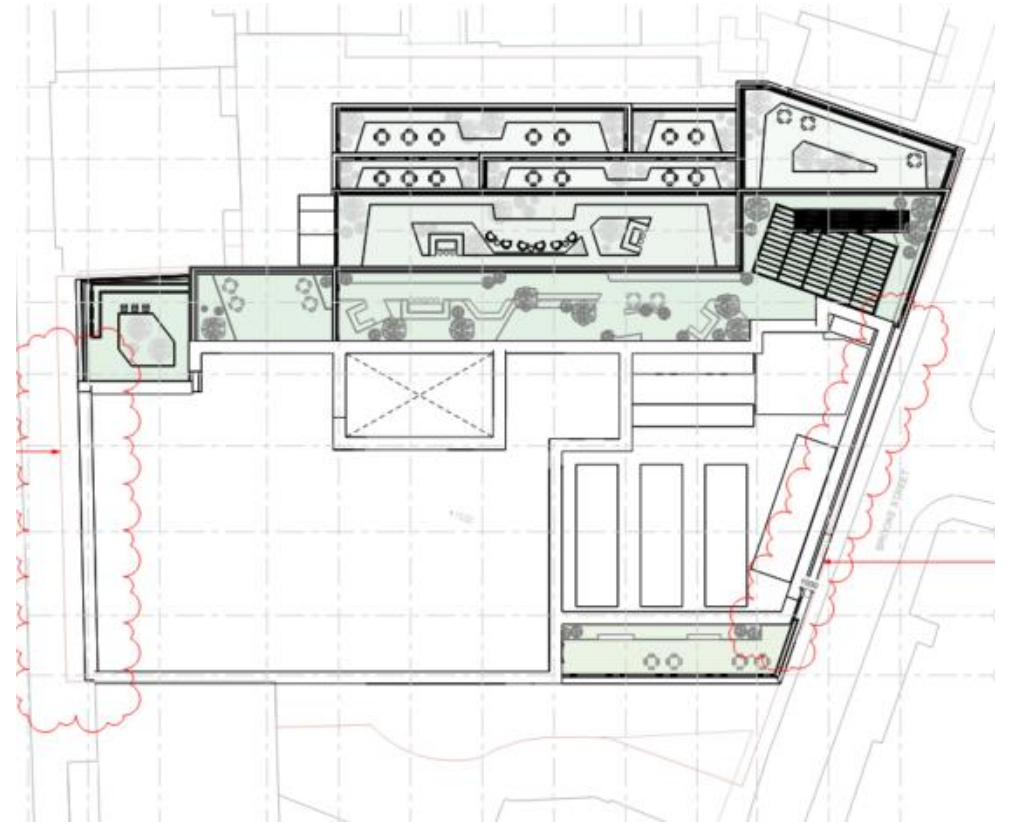
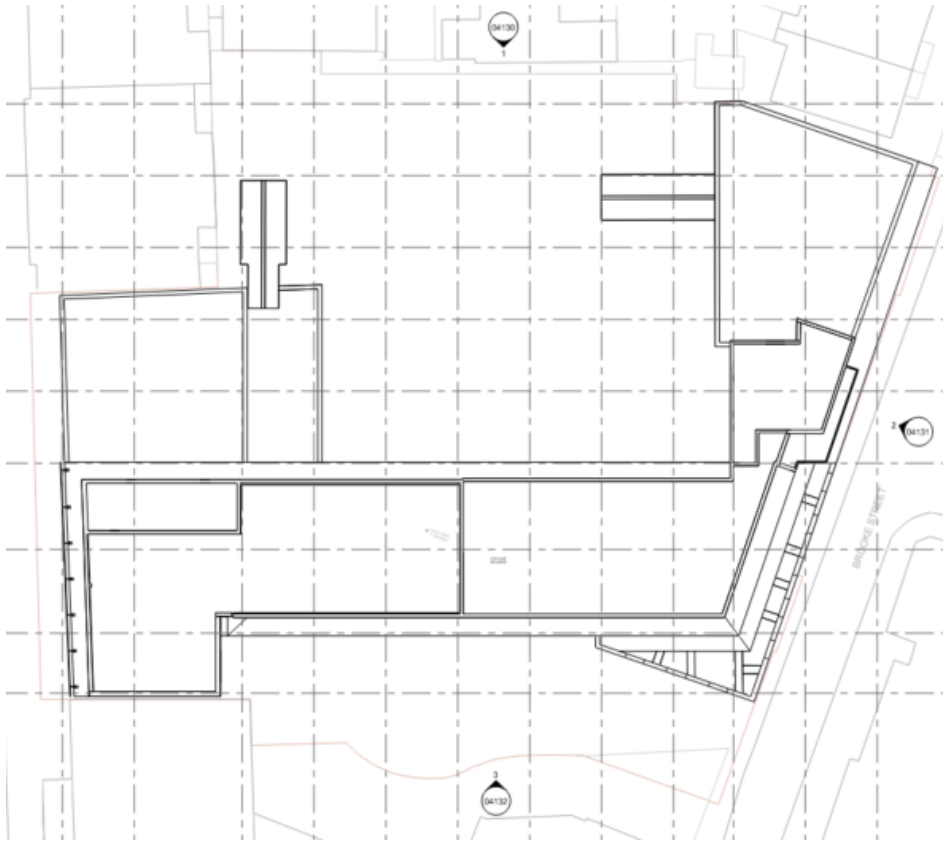












Gray's Inn Road – existing and proposed elevations

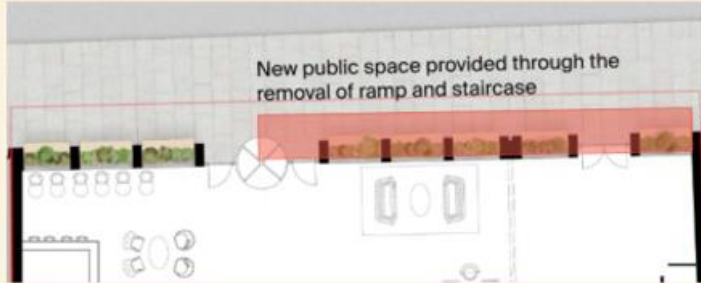


Improvements to public realm along Gray's Inn Road

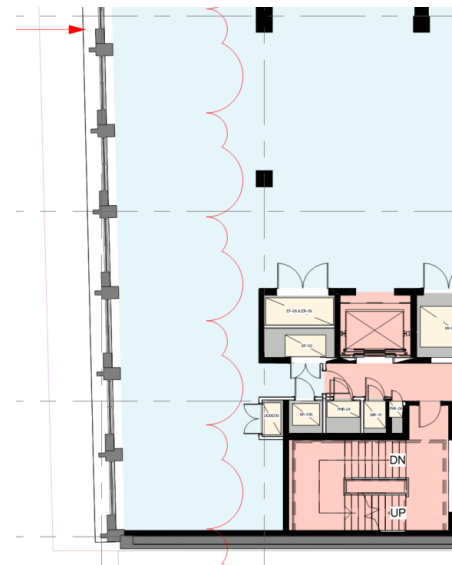
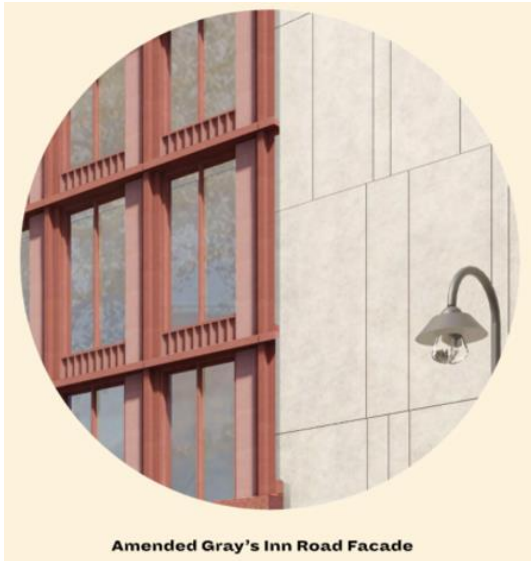
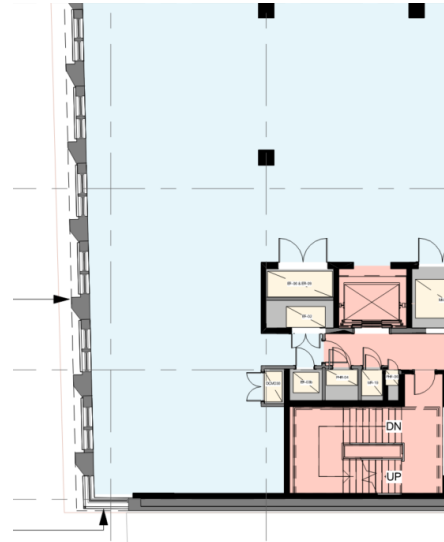
7.02 Public Realm Experience

Planting and Seating incorporated at street level providing rest space and public amenity.

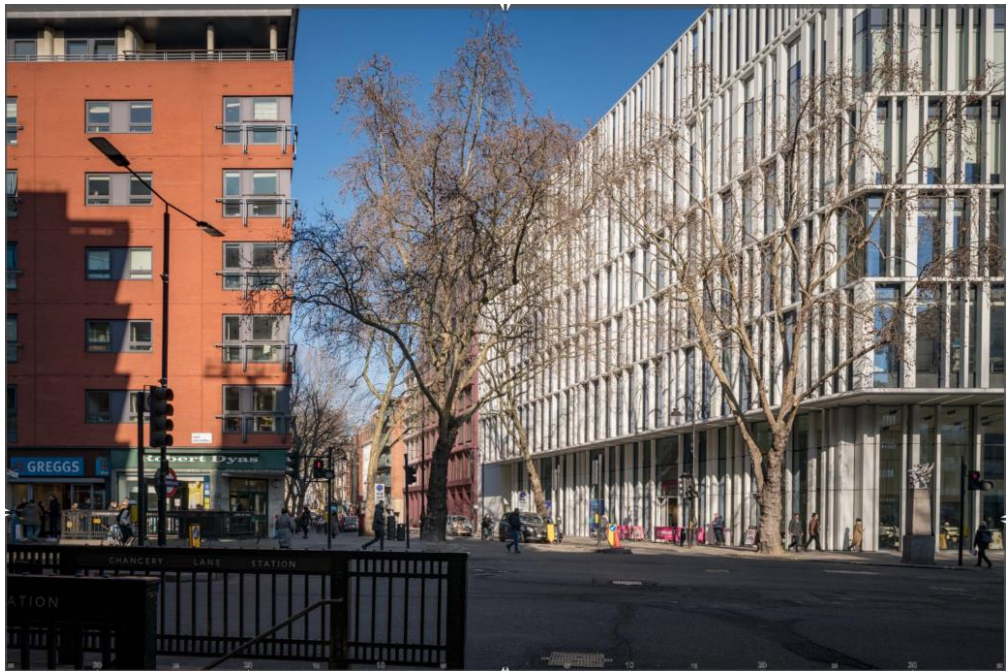
Additional Public provision is around 38.2 m²



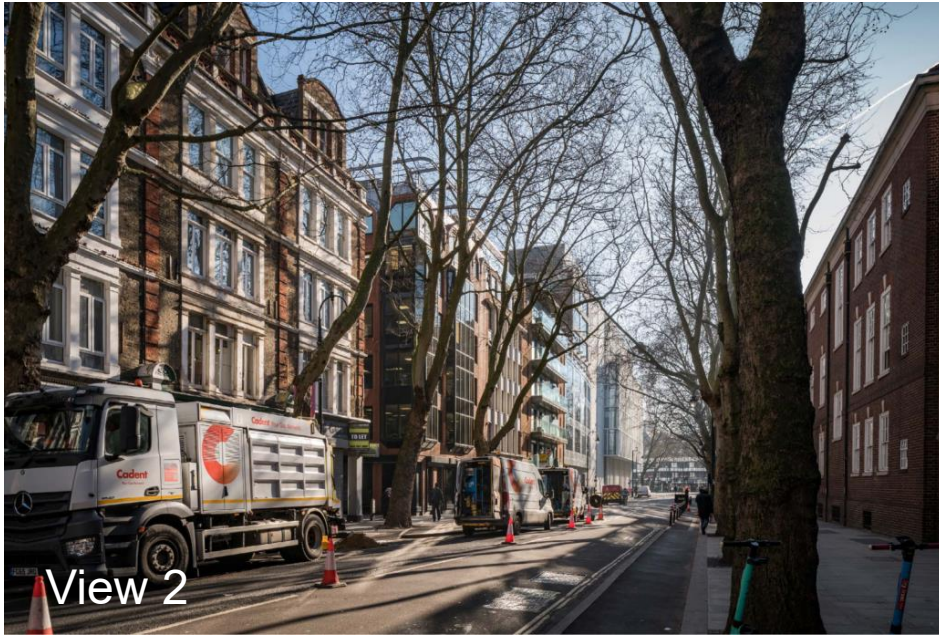
Gray's Inn Road elevation - Changes to the upper floors of the front building line



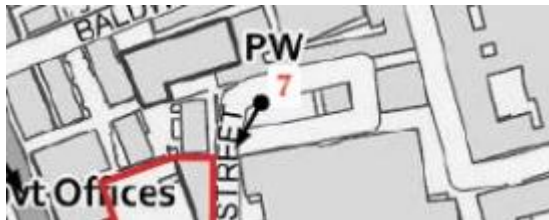
View towards from junction with High Holborn – existing and proposed



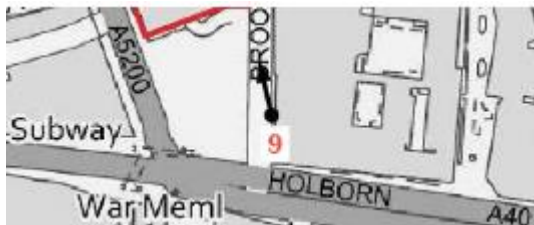
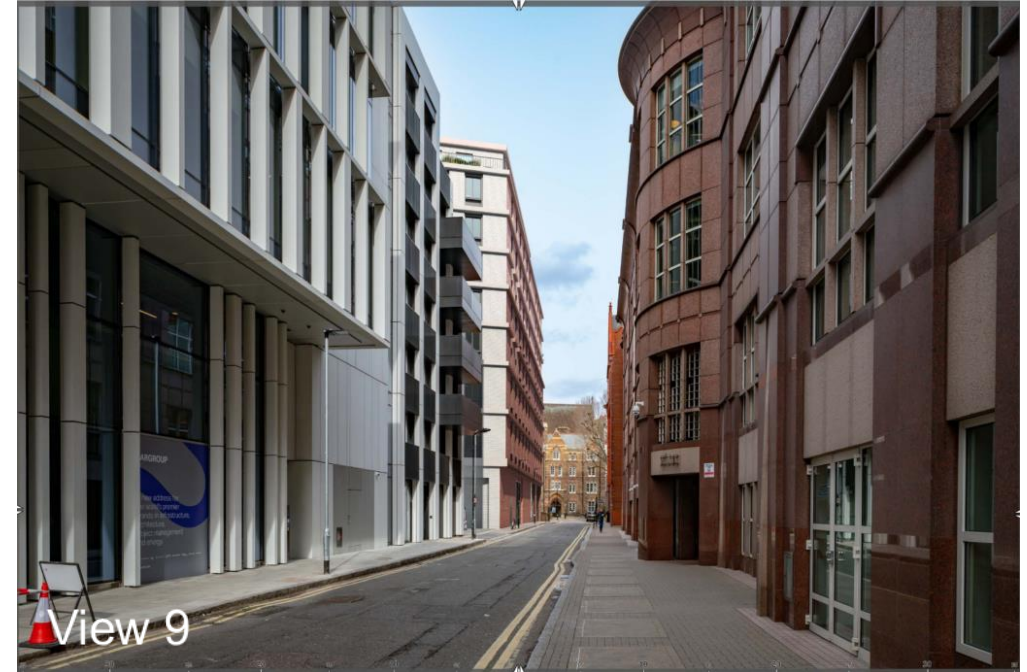
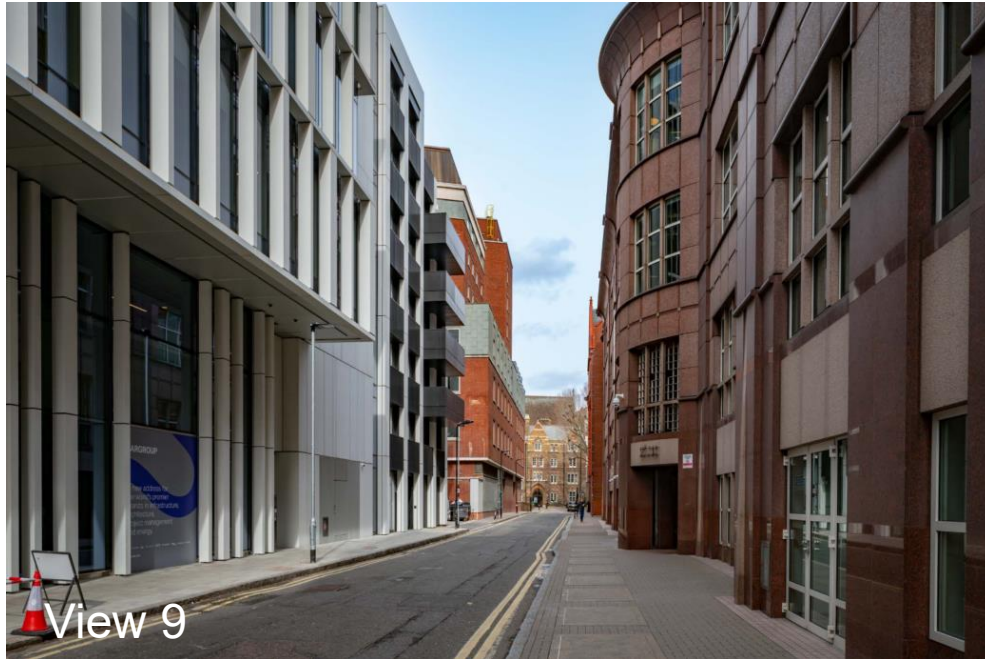
View south along Gray's Inn Road – existing and proposed



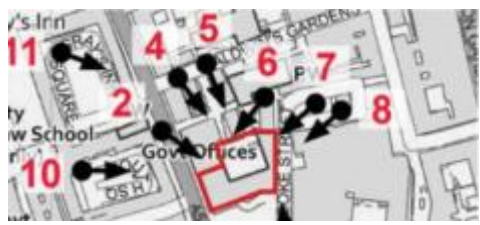
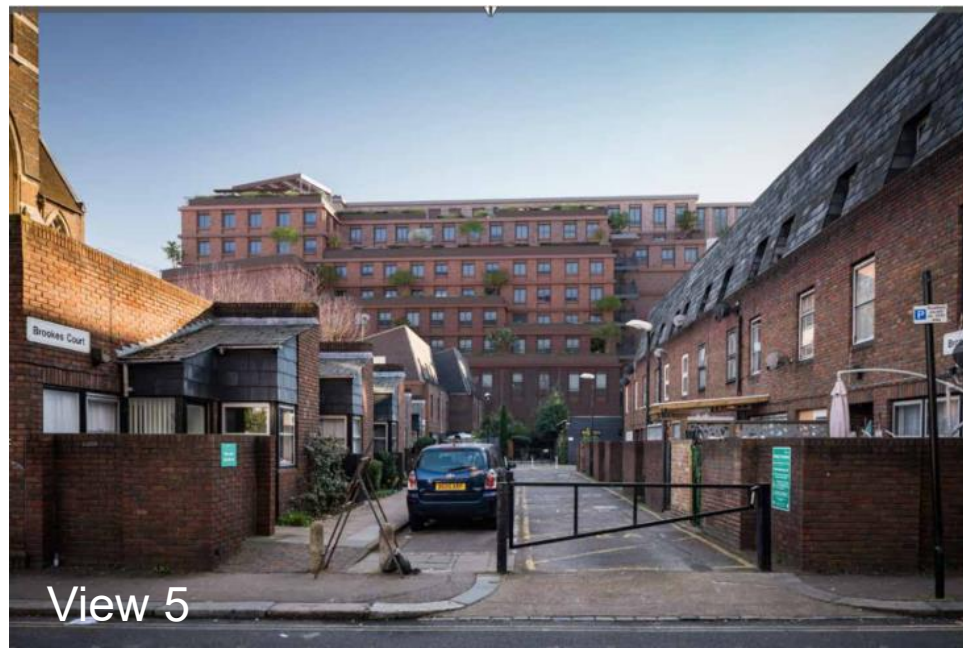
View from Dorrington Street – existing and proposed



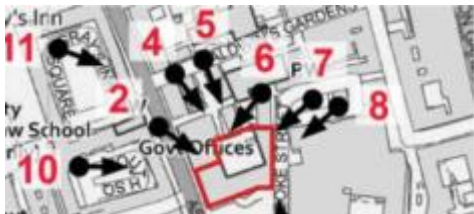
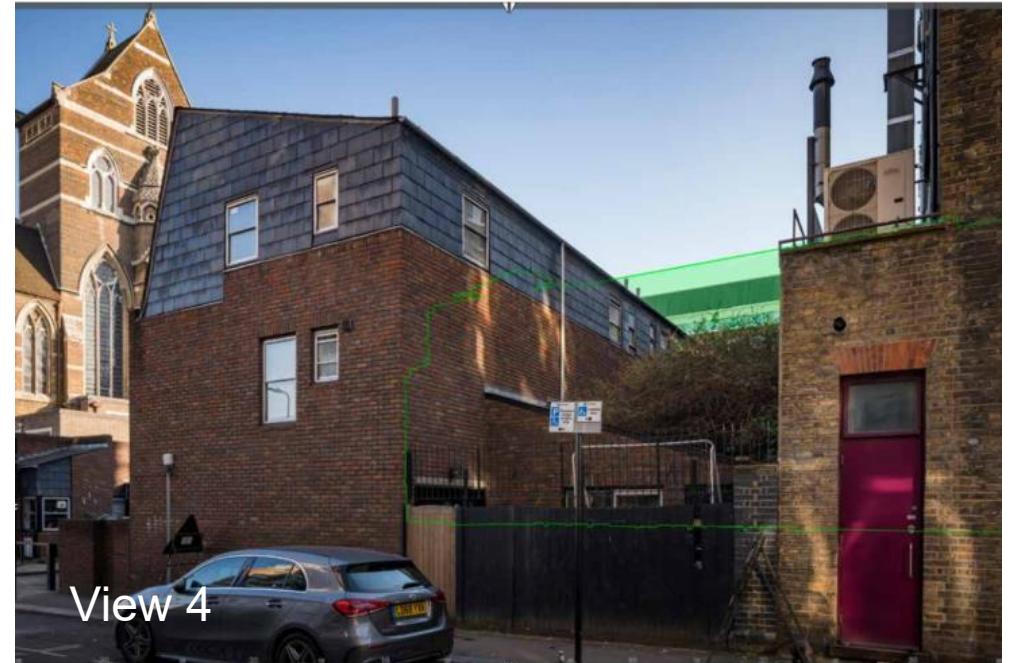
View from Brooke Street – existing and proposed



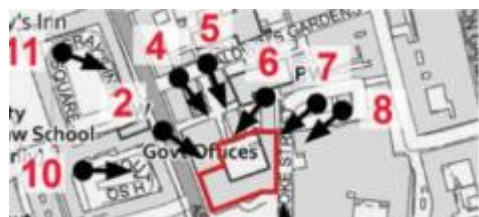
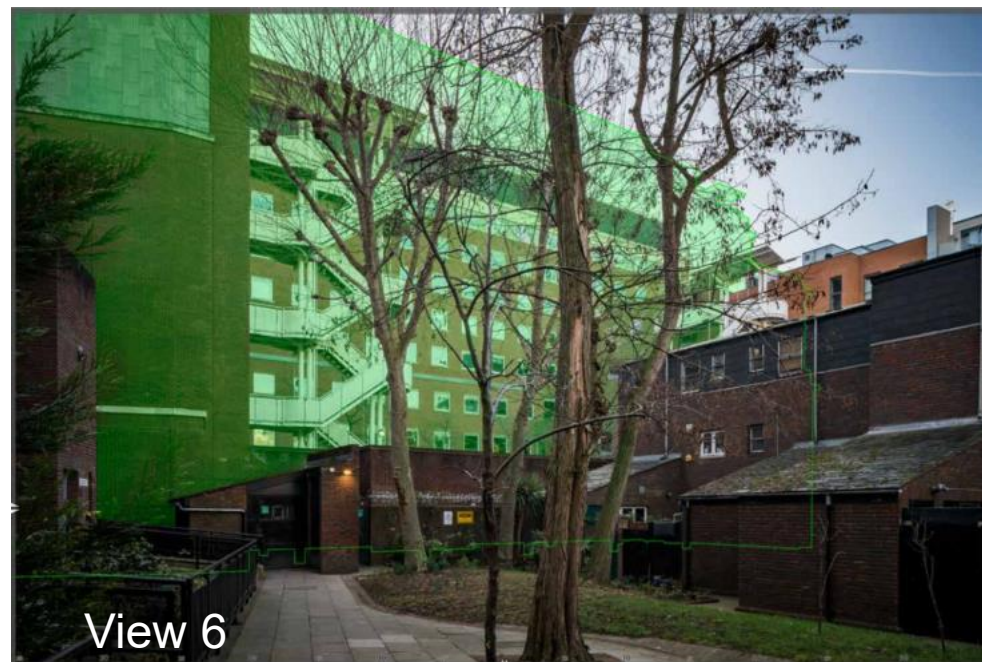
View from Baldwin's Gardens



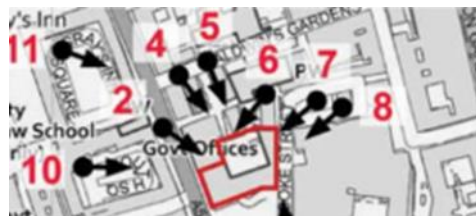
View from Baldwin's Gardens – existing and proposed



View from Brookes Court – Existing and proposed



View from Brooke's Market – Existing and proposed



View from South Square – Existing



View from South Square – Proposed



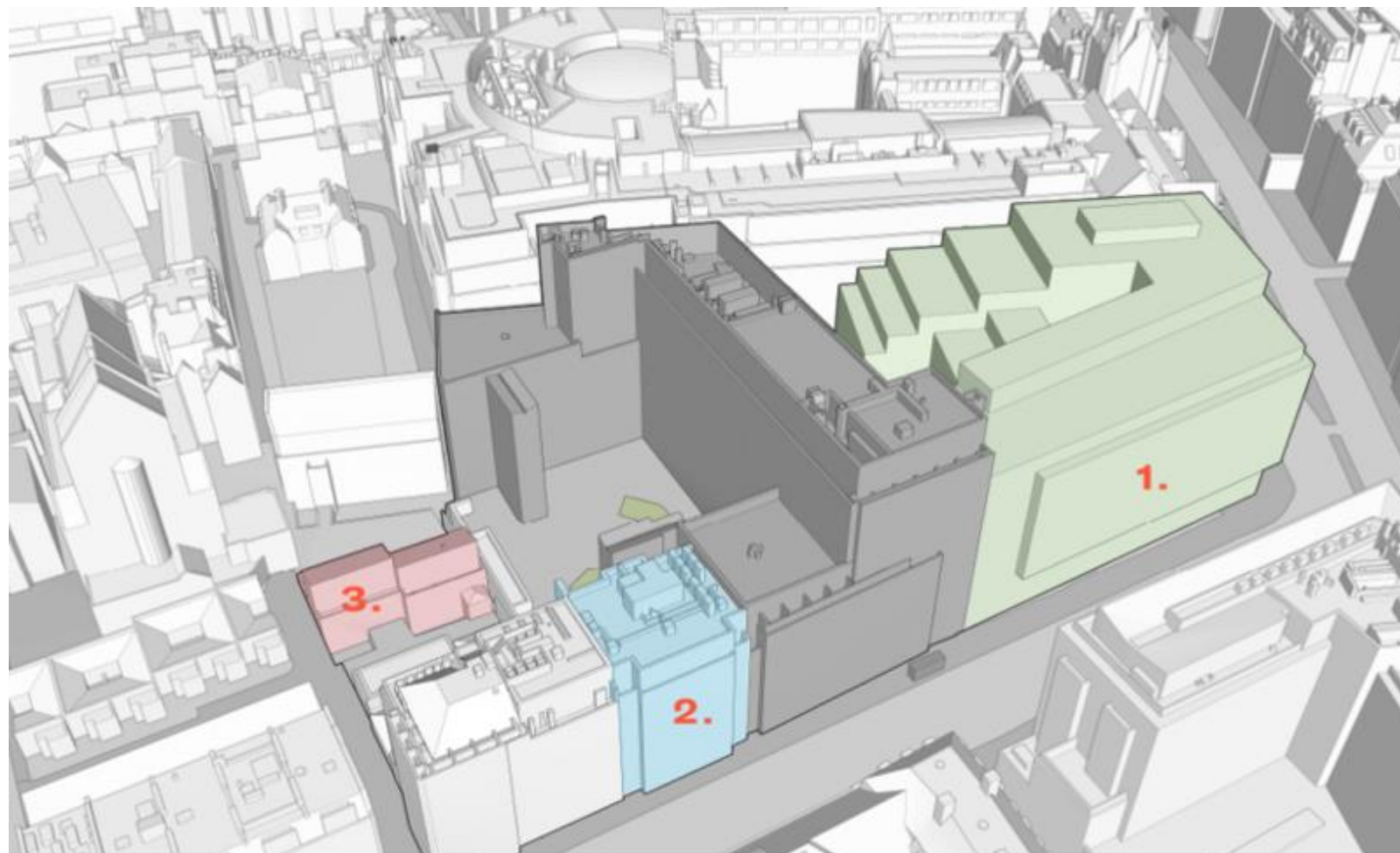
View from Gray's Inn Square - existing



View from Gray's Inn Square - proposed



Neighbouring buildings



3. 29-32 Brookes Court
Residential

2. 24-28 Grays Inn Road
Residential

1. 150 Holborn
Mixed use- Office, Retail & Residential

No. 33 Brooke Street – Residential block to the south

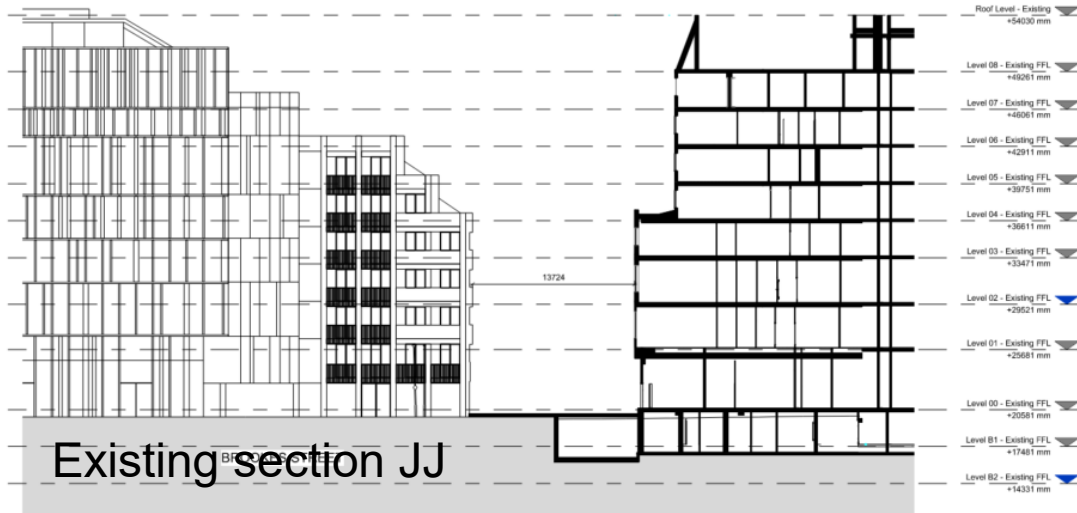


33 Brooke Street



Application site

Existing and proposed section showing site with no. 33 Brooke Street



1 Existing Section JJ
1:200



Proposed Section JJ
1:200

No. 24-28 Gray's Inn Road – Daylight and outlook

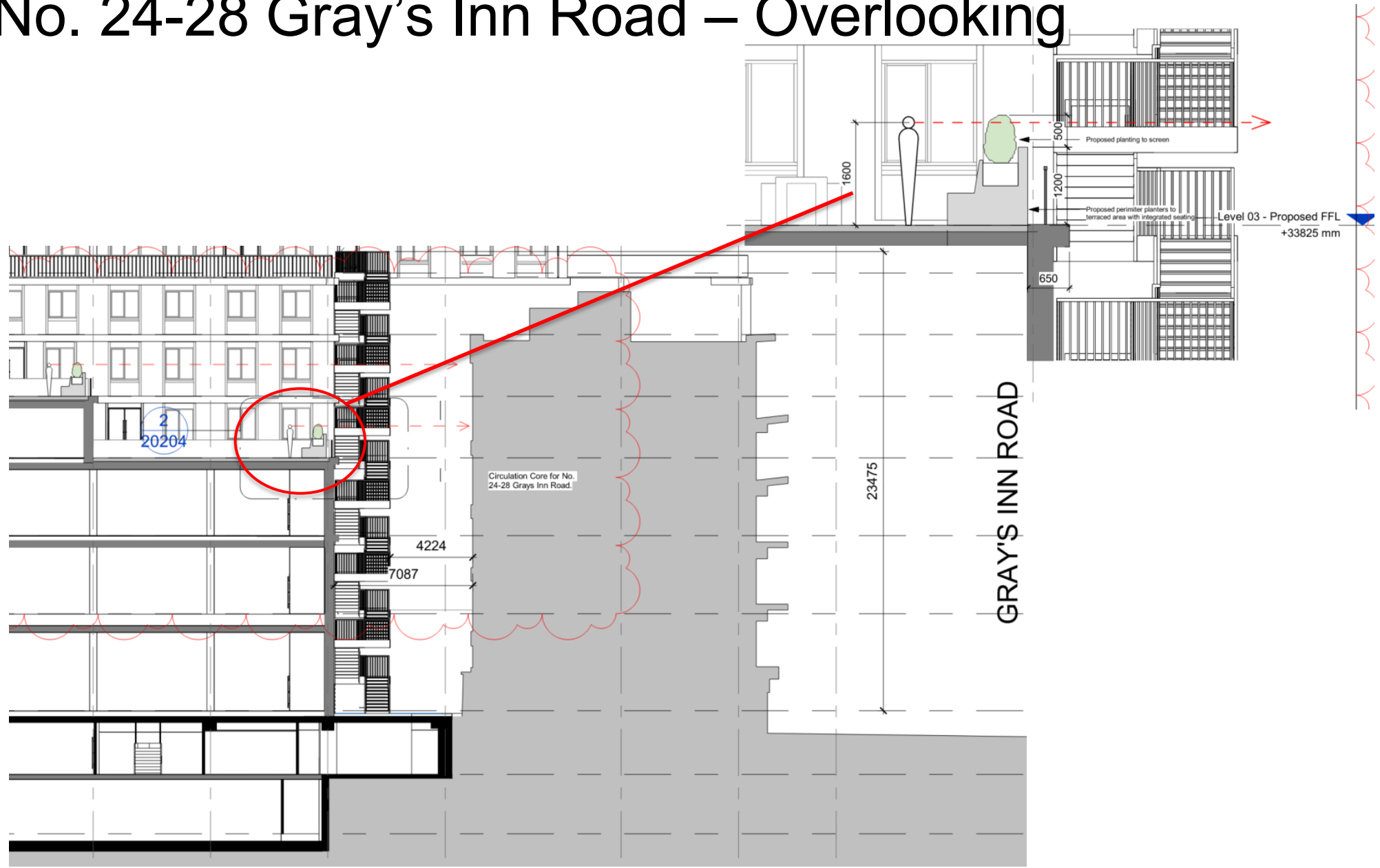


Image 02: View from room R2/62 in the existing situation



Image 03: View from room R2/62 in the proposed situation

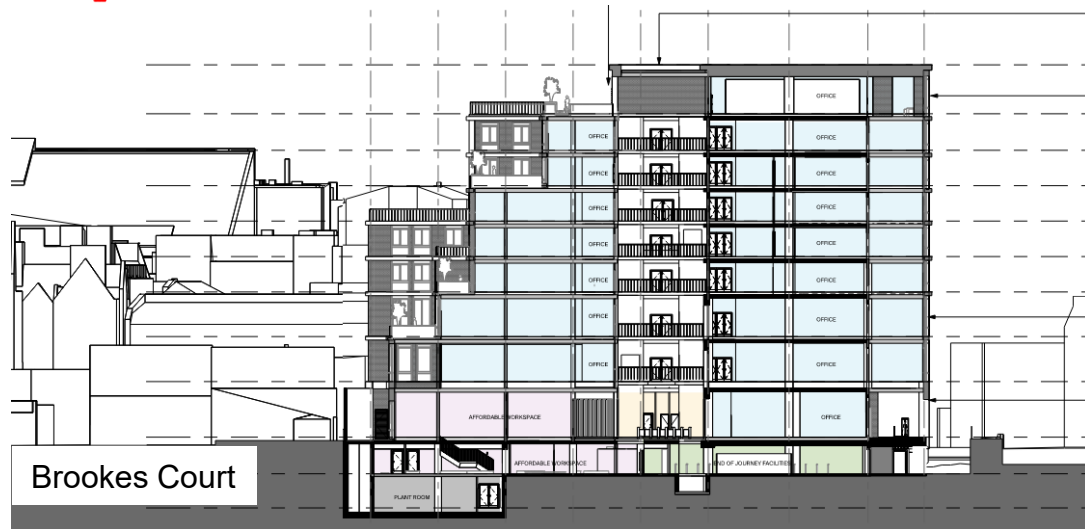
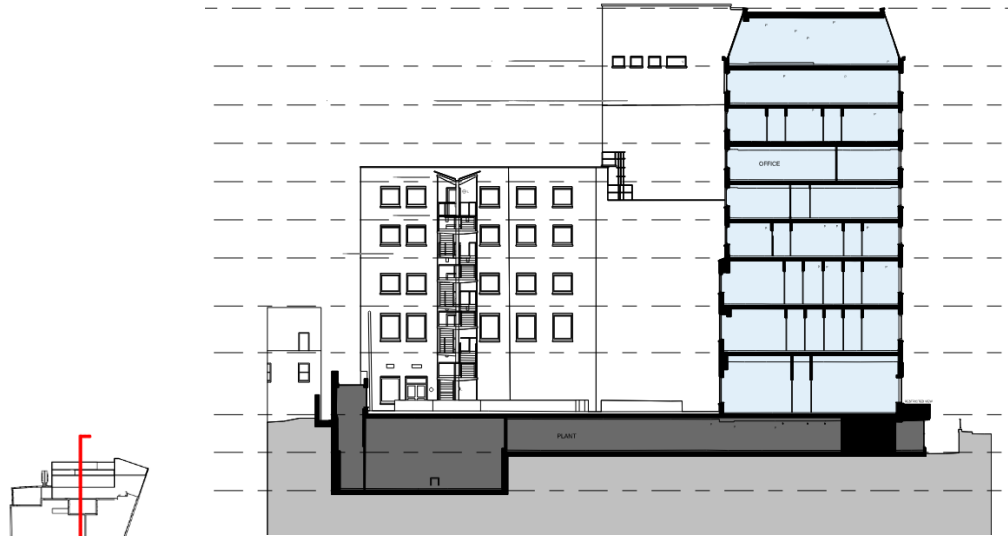
No. 24-28 Gray's Inn Road – Overlooking



Brookes Court, Baldwin Gardens



Existing and proposed section FF



Landscaping – Existing (showing trees) and proposed



Roof terraces - Proposed



Roof terraces - Visuals

ROOF TERRACES

