

Address:	105 - 121 Judd Street London WC1H 9NE		1
Application Number(s):	2025/1684/P	Officer: John Nicholls	
Ward:	Bloomsbury		
Date Received:	17/04/2025		
Proposal:	Variation of conditions 2 (approved drawings) and 20 (fire statement) of planning permission ref. 2022/1817/P dated 10/05/2023 (Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services), namely to: amend design and massing of rooftop plant enclosure and parapets; provide new louvres within existing openings and infill existing windows; provide extended bridge link over lightwell; extend southwest stair core; provide extract flues to roof, and; amend northeast entrance including provision of access ramp.		
Background Papers, Supporting Documents and Drawing Numbers:			
Existing Drawings:			
4608-07-EX-304 A, 4608-07-EX-301 A, 4608-07-EX-204 A, 4608-07-EX-203 A, 4608-07-EX-202 A, 4608-07-EX-201 A, 4608-07-EX-105 A, 4608-07-EX-104 A, 4608-07-EX-103 A, 4608-07-EX-102 A, 4608-07-EX-101 A, 4608-07-EX-100 A, 4608-07-EX-099 A, 4608-ST-EX-01-101 A, 4608-ST-EX-00-001A			
Approved Drawings:			
4608-07-DM-105 A, 4608-07-DM-103 A, 4608-07-DM-102 A, 4608-07-DM-101 A, 4608-07-DM-100 A, 4608-07-DM-099 A, 4608-07-DM-204 A, 4608-07-DM-203 A, 4608-07-DM-202 A, 4608-07-DM-201 A, 4608-07-GA-100 Rev C; 4608-07-GA-101 Rev B; 4608-07-GA-102 Rev B; 4608-07-GA-103 Rev B; 4608-07-GA-104 Rev B; 4608-07-GA-105 Rev B; 4608-07-GA-106 Rev B; 4608-07-GA-120 Rev A; 4608-07-PR-201 Rev D;			

4608-07-PR-202 Rev C; 4608-07-PR-203 Rev D; 4608-07-PR-204 Rev C; 4608-07-PR-210; 4608-07-PR-211; ST-07-PR-301 Rev B; ST-07-PR-302 Rev B; ST-07-PR-310

Proposed Drawings:

4608-ST-07-GA-120D,4608-31-PL-208A, 4608-31-PL-207A, 4608-31-PL-206A, 4608-31-PL-205A, 4608-07-PR-204G, 4608-07-PR-203G, 4608-07-PR-202F, 4608-07-PR-201G, 4608-07-PR-302E, 4608-07-PR-301E, 4608-07-GA-106E, 4608-07-GA-105E, 4608-07-GA-104E, 4608-07-GA-103E, 4608-07-GA-102E, 4608-07-GA-101E, 4608-07-GA-100G, 4608-07-GA-099A, 4608-07-DM-105A, 4608-07-DM-103A, 4608-07-DM-102A, 4608-07-DM-101B, 4608-07-DM-100B, 4608-07-DM-099A, 4608-07-DM-204A, 4608-07-DM-203A, 4608-07-DM-202A, 4608-07-DM-201A, 4608-07-EX-304A, 4608-07-EX-301A, 4608-07-EX-204A, 4608-07-EX-203A, 4608-07-EX-202A, 4608-07-EX-201A, 4608-07-EX-105A, 4608-07-EX-104A, 4608-07-EX-103A, 4608-07-EX-102A, 4608-07-EX-101A, 4608-07-EX-100A, 4608-07-EX-100A, 4608-07-EX-099A, 4608-ST-EX-01-101A,4608-ST-EX-00-001A, 4608-07-PR-210C, 4608-07-PR-211C

Background Papers and Supporting Documents:

Flood Risk Assessment & SUDS Strategy Parts 1-7, Phase 1 Land Contamination Report 11121-A2SI-XX-XX-RP-X-0001-00, Townscape, Heritage and Visual Impact Assessment March 2022, Air Quality Assessment and Odour v5 October 2025, Statement of Community Involvement April 2022, WLCA 13th April 2022, Energy Statement Parts 1-3 13th April 2022, Circular Economy Statement 13th April 2022, Preliminary Ecological Appraisal February 2022, Urban Greening Factor February 2022, Biodiversity Impact Assessment April 2022, Planning Statement April 2022, Operational Waste Management Strategy March 2022, Transport Statement March 2022, Sustainability Statement 13th April 2022, Structural Planning Report parts 1-9, Noise Assessment April 2025, Fire Statement April 2025, Draft Employment, Skills and Supply Plan, GIA Daylight & Sunlight Assessment parts 1-2, Gerald Eve cover letter 12th April 2022, Assessment of development proposals which would accord with BRE Daylight Guidance 28/07/2022. Townscape, Heritage and Visual Impact Assessment April 2025, Odour Impact Assessment April 2025, Daylight and Sunlight Letter of Conformity and Appendices April 2025, Section 73 Amendments Design Pack April 2025, Statement of Community Involvement April 2025.

RECOMMENDATION SUMMARY:

Grant Planning Permission Subject to a Deed of Variation to the Section 106 Legal Agreement

Applicant:

Agent:

Native Land c/o agent

Newmark
One Fitzroy
6 Mortimer Street

	London W1T 3JJ
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ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	As approved GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E	Lab enabled offices / lab spaces	8898 (+1872)	8847	-51
Total	All uses	8898 (+1872)	8847	-51

EXECUTIVE SUMMARY

- i) Planning permission was granted under Ref: 2022/1817/P on 10/05/2023 for a roof extension at third, fourth and fifth floor level, with rooftop plant, with the continued commercial use of the building (Class E) along with associated external alterations to all elevations, public realm improvements, roof terraces and levels three, four and five, provision of cycle parking, waste/recycling storage and other services.
- ii) The approved extension provided additional office floorspace specifically designed and laid out to allow for lab enabled knowledge quarter uses to be accommodated at the site all within the existing commercial use (Class E).
- iii) This Section 73 application seeks amendments to revise the scheme externally, by
 - Changes to the design of the rooftop plant enclosure slightly increasing its footprint and height (by 80sqm and 0.26m respectively),
 - new louvers at lower ground, ground and first floor levels (some integrated into some upper sash windows) for additional plant inside the building,
 - frosted glazing to 3 windows (Hastings Street and Thanet Street),
 - 5 flues located in the middle of the amended roof plant enclosure (extending 3m above the height of the plant enclosure),
 - a new external access ramp re-introduced to the main entrance on the corner of Judd Street and Hastings Street,

- an extension to the southwest stair core from third to fifth floor level (to meet fire requirements for the building) and
 - some minor changes to the ground floor treatment at the Thanet Street frontage.
- iv) Internally, there is a small reduction in floorspace (51sqm GIA) of the affordable workspace and its relocation from the basement to the 1st floor, which will also now be provided at zero rent not 50% market rents. Finally, in light of a proposed tenant now being signed up, some of the lab enabled offices on floors 1 and 2 are now proposed to be level 2 containment laboratories (Class E).
- v) The design changes to the plant enclosure include a small height change to the building of 0.26m compared to the previously approved scheme when measured from the top of the plant screen enclosure with 5 flues emerging a further 3m above this. The plant enclosure on the roof has also been expanded by an additional 80sqm. to the plant enclosure are most noticeably closer (approximately 3.5m) to the Thanet Street frontage. Combined with the further changes to the bulk and massing of the re-designed stair core at 2nd and 3rd floor levels on the southern corner on Thanet Street, the amendment results in greater visual prominence to the southern corner of the building making it slightly more visible in street views. However, this is a moderate increase in the massing when compared to the consented scheme.
- vi) Moreover, the architectural treatment to the plant screening that is now more visible has been enhanced, with articulation through fins and material variety, and as a result of these design improvements, the additional bulk and height is considered acceptable, and is not considered to harm the character or appearance of the conservation area.
- vii) The provision of the five new flues located in the centre of the roof level are also considered acceptable, as it is understood that these will have very limited visibility from street level, and with their location in the centre of the roof plant enclosure only slightly higher than the surrounding buildings, they are also only partly visible from upper floor windows of neighbouring properties.
- viii) The various other changes including the new louvers , infilling of some windows on the south (non-street facing) windows, adjustment of the levels of the main entrance plinth for alignment with internal levels, the extension of the bridge link over the existing lightwell facing Thanet Street, the widening of a single door to a double door also facing Thanet Street and works to the south and west parapet in brickwork and stone, are considered acceptable improving the overall design of the scheme and preserving the character and appearance of the conservation area.
- ix) As part of the original application, part of the reception area was shown as a coffee point / café which members of the public would be able to use as well as

workers. It was part of the office demise and was not a separate planning unit. Now that a particular tenant has been identified, and for operational / security reasons, this is something no longer proposed in the amended scheme. Part of the concern at its loss, expressed in public comments has been less street activation by having such a coffee shop in the building open to the general public. However, firstly the original decision for approval didn't hang on its inclusion, and secondly there are other similar amenities in the local area as the site is located close to several pubs, cafes and convenience stores. Therefore, although the loss of such an additional facility is regrettable, there are many other active frontages in the local area so that the non-provision of this particular unit is not considered to be contrary to policies C2 (Community facilities), TC1 (Town centres and retail).

- x) Greening would still be proposed in front of this part of the building in the same way as permitted. There would still be doors which would open out from this area so there would be an active frontage, which was not previously part of the building, though this would not now be publicly accessible.
- xi) In terms of amenity, the proposed amendments include the 5 flues in the centre of the roof, and therefore air quality and odour have been a concern to many local residents, as the proposed change from lab enabled office to level 2 containment labs on the 1st and 2nd floors has also raised health and safety concerns. As a result, air quality and odour reports have been updated during the course of the application (by Tetra Tech) to show the types of emissions that might be emitted from these flues, which have been independently audited both by the Council (RSK) and also by the residents group BRAG (Kalaco).
- xii) The updated Tetra Tech report submitted by the applicant and the RSK analyses of this report on behalf of the Council agree that the proposed emission rates from chemicals used within the experiments conducted inside the building, are extremely low and would not pose a risk to either air quality or the health and safety of the public. As this building is the tallest in the immediate locality, this also means that the extractions flues are more than 3m above the eaves of other local residential properties, which meets the requirements of the Council's Environmental Health Team.
- xiii) A large number of concerns raised include public safety concerns related to the nature of the life sciences containment research lab use now proposed on 2 floors. However, any at-all hazardous work undertaken in the lab space will be subject to the appropriate "containment level" overseen by The Health and Safety Executive, and also subject to controls under The Health and Safety at Work Act, The Workplace Regulations and the Control of Substances Hazardous to Health Regulations, which should give residents comfort that the work is regulated by a recognised body, requiring the occupier to meet high levels of safety on site in undertaking their work.

- xiii) Furthermore, the applicants have agreed to a pre-commencement condition requiring the flues to be tested to ensure that the processes undertaken inside the labs and the emissions discharged are satisfactory before the flues are used properly. Officer's and the Council's independent Environmental Health auditor (RSK) agree that this procedure would be enough to satisfy them that an ongoing monitoring condition would not be considered necessary.
- xiv) In terms of affordable workspaces, the end user has also updated its offer of providing 102sqm of affordable workspace as part of this amendment application. The offer firstly changes the location of the affordable workspace within the site from the basement to the first floor and secondly changes the offer of letting this out at 50% of market rate for 20 years, to free of charge for 20 years.
- xv) In addition, the end use apprenticeships offer has also been approved by the end user. This has been changed from the recruitment and provision of two end use apprenticeships per year for a 5-year period to an extended period of 10-years following occupation.
- xvi) The amended scheme is therefore considered to comply with the development plan as a whole and is recommended for approval subject to a deed of variation of the S106 agreement and amended planning conditions.

OFFICER REPORT

Reason for Referral to Committee:

The Director of Economy, Regeneration and Investment has referred the application for consideration after briefing members (Clause 3(vii)). The panel considered it should be heard by committee due to the high level of public interest in the application.

1.0 SITE AND BACKGROUND

- 1.1 The application site relates to an existing four storey, plus basement, office building located on the north-western side of Judd Street, at its junction with Hastings Street. The property is a red brick Edwardian building which has frontages on to Judd Street to the east, Hastings Street to the north and Thanet Street to the west and was constructed as a purpose-built office in two phases. The first phase was an L-shape section on Thanet Street and Hastings Street which was constructed between 1900-1910, whilst the second phase completed the Judd Street elevation and was built between 1922-1939.
- 1.2 The building was occupied by the Salvation Army from 1911 until 2000 and the Royal National Institute of Blind People (RNIB) from 2004 until recently.



Figure 1 – Street view south on Judd Street of the existing building

- 1.3 The site is located within the Central London Area, Knowledge Quarter Innovation District and the Bloomsbury Conservation Area. The building is not listed but is identified in the Bloomsbury Conservation Area Appraisal and Management Strategy (2011) as making a positive contribution to the character of this part of the conservation area.
- 1.4 The properties surrounding the site are predominantly Victorian and Edwardian red brick mansion blocks which are between 5 and 7 storeys in height. To the south, the site is bound by two terraces of residential properties on Judd Street and Thanet Street which are Grade II listed.
- 1.5 Works commenced on site in October 2024 to start to implement the original approval for lab enabled offices. The works have been ongoing since then to implement that scheme and the timing of this decision for these proposed amendments will enable works to continue on site without a pause.

2.0 THE PROPOSAL

- 2.1 This proposal seeks to amend the scheme externally, by increasing the size of the rooftop plant enclosure footprint in volume (80sqm) and height (0.26m), changes to the design of the rooftop plant enclosure, new louvers at lower ground, ground and first floor levels (some integrated into some upper sash windows), frosted glazing to 3 windows (Hastings Street and Thanet Street), 5 flues located in the middle of the amended roof plant enclosure (extending 3m above the height of the plant enclosure which itself measures 3.2m in height),

a new external access ramp re-introduced to the main entrance on the corner of Judd Street and Hastings Street, an extension to the southwest stair core from third to fifth floor level (to meet fire requirements for the building) and some minor changes to the ground floor treatment at the Thanet Street frontage.

- 2.2 Internally, there is a modest reduction in floorspace (51sqm GIA), a relocation of the affordable workspace from the basement to the 1st floor, which will also now be provided at zero rent not 50% market rents. Finally, in light of a proposed tenant now being signed up, the laboratory space now proposed is also being sought to be finished to a Level 2 containment laboratory level, rather than just general lab enabled office space.



Figure 2. Permitted view – Ref: 2022/1817/P



Figure 3 – Proposed view Ref: 2025/1684/P

3.0 RELEVANT HISTORY

2021/3922/P - Temporary change of use of the Second and Third Floors of 105 Judd Street from Offices (Class E) to Education (Class F1) up until 31 January 2023. **Approved 11/10/2021.**

2022/1817/P - Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services. **Approved 10/05/2023**

2023/2052/P - Details required by condition 9 (land contamination) of permission reference 2022/1817/P dated 10/05/2023 (Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services). **Approved 28/07/2023**

2023/2058/P - Details required by condition 5 (tree protection) of permission reference 2022/1817/P dated 10/05/2023 (Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services). **Approved 21/07/2023**

2023/2080/P - Details required by condition 7a (air quality monitors) of permission reference 2022/1817/P dated 10/05/2023 (Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services). **Approved 27/10/2023**

2023/2979/P - Non material amendment to planning permission 2022/1817/P dated 15/09/2022 for 'Partial demolition and erection of extension at part third floor, fourth floor, fifth floor and rooftop plant in connection with the ongoing use of the building for commercial, business and service uses (Class E); associated external alterations to the elevations, improvements to the public realm and replacement of the existing ramp; roof terraces at levels three, four and five; provision of cycle parking, waste/recycling storage and other services; associated external alterations', NAMELY; change internal layouts and arrangements including the layout and location of the affordable workspace,

changes to the design of the front entrance and introduction of a ramp, extension of the main entrance plinth along the south-east elevation and installation of new doors and adjustments to the height of balustrades on South East and South West Elevation and installation of a balustrade on the north-east corner flat roof. **Approved 19/02/2024**

2023/4745/P - Details pursuant to condition 7b (Air quality Baseline Report) of planning permission ref 2022/1817/P dated 10/05/2023 for 'Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services'. **Approved 12/01/2024**

2025/1649/P - Non material amendments to planning permission 2022/1817/P granted subject to a legal agreement on 10/05/2023 for 'Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services.' The amendment is to remove reference to the application drawings and documents after the Proposal description. **Approved 03/09/2025**

4.0 CONSULTATION

Local groups

4.1 Bloomsbury CAAC

No comments received.

4.2 Bloomsbury Residents Action Group (BRAG)

Cafe

- The loss of the café means there will be no active street frontage onto Judd St and represents a material change that undermines both the spirit and substance of the previous approval.
- The café element was not a cosmetic addition; it was integral to the mixed-use balance and social sustainability of the scheme, offering a shared, non-exclusive space that promoted interaction between residents, local workers, students, and visitors.
- The loss of this café would reduce the sites contribution to Camden's local amenity offer and would be contrary to policies C2 (Community facilities), TC1 (Town centres and retail), A1 (Managing the impact of

development) as this stresses the importance of active frontages especially in mixed-use neighbourhoods like Bloomsbury and Kings Cross, and policy CC1 (Climate change mitigation) which encourages sustainable development where local amenities reduce the need for travel.

- With the loss of the Café (a public amenity) and NO reactivation of the street frontage on Judd Street, combined with the potential negative impact of biochemical laboratory facilities on residential amenity – where are the compelling public benefits to outweigh the harm to heritage assets?
- The café would also provide a local meeting space, a passive safety and vibrancy function, employment opportunities and contribute to character and identity of the development.
- It is procedurally unfair and contrary to good planning practice for this element to be removed after consent was granted, without new community consultation.
- A condition has been suggested to retain the café in accordance with originally approved plan as follows:

“The ground-floor café/restaurant use (Class E(b)) shown on the approved drawings shall be provided and fitted out prior to first occupation of the building and shall be retained for the lifetime of the development unless otherwise agreed in writing by the Local Planning Authority following evidence of unviability and full re-consultation with the local community.”

Officer comments:

As part of the original application part of the reception area was shown as a coffee point/café which members of the public would be able to use as well as workers. It was part of the office demise and was not a separate planning unit. Now that a particular tenant has been identified, and for operational/security reasons, this is something which is no longer proposed.

Greening would still be proposed in front of this part of the building in the same way as permitted. There would still be doors which would open out from this area so there would be active frontage, which was not previously part of the building, though this would not be publicly accessible.

There are other local amenity uses in the local area as the site is located in an area with several pubs, cafes and convenience stores close to the site. Therefore, although the loss of such an additional facility is regrettable, there are many other active frontages in the local area which means that the non-provision of this particular unit is not considered to be contrary to these policies.

In terms of procedural unfairness, this application is an opportunity for community consultation on this matter.

The café area is an ancillary part of the entrance area, as part of the continued use of an existing Class E use within the building. The café use was not mentioned in the description of development in the original application, nor was it referred to in the committee report as something key to the consideration for the grant of planning permission. Therefore, a condition requiring it is fitted out and retained would prohibit any change to this part of the planning unit, which would not be enforceable and therefore can't be included.

Land use / Change of use

- The proposed change of use from lab enabled offices to include Level 2 containment level laboratories should not occur next door to or opposite residential buildings, as it will have a harmful impact of the neighbouring residential community and will basically change forever the character of this part of the Conservation Area.

Officer's comments:

The proposed use will not alter the external appearance of the building, and therefore will not affect the architectural or visual character of the Conservation Area. The change is internal in nature. While the activity within the building will change, it remains a research-based employment use consistent with the established academic and medical character of the wider Bloomsbury area. The proposal would not alter the mixed institutional and residential character that defines the Conservation Area.

Retaining the original building / amount of development

- The reality is that 75% of the exterior has perhaps been retained but the entire interior, including the unusually high floor levels (which we were told they prized so much) has been demolished. The building has been gutted. As for the windows, some will now be infilled, and new louvres are proposed to fulfil the potential tenant's requirements. It was utterly misleading and economical with the truth to claim that the existing building was to be 'retained and reused'.

Officers comment:

A further 2% of the building is proposed to be removed on the 1st floor slab reducing the retention figure down to 73% of the original. Officers consider that,

this does/not make a material change to the as proposed amendment and therefore can be considered as part of the s73 being assessed.

Officers have discussed further demolition in the basement area, related to the foundations of the building, and these further demolition works will be the subject of a further variation application in the future.

Design / heritage

- Camden Council's policy [DP25] reflects the broader principle that development should not negatively impact the character and appearance of conservation areas, including the setting of listed buildings, unless there are compelling public benefits to outweigh the harm to heritage assets. There are 25 Grade II listed buildings situated immediately adjacent to 105 Judd Street: the two-storey terrace of 17 houses on Thanet Street and 8 three-storey houses on Judd Street.

Officer's comments:

The proposed changes are minimal and are therefore not considered to harm the character or appearance of the conservation area, or the setting of the adjacent listed buildings (this is addressed further within the Design section of the report below).

The chimneys are located in the centre of the roof and the visuals included in the submission show that any views of them from upper floors of neighbouring blocks will be minimal. In short, they are not considered to block outlook due to their distance from neighbouring windows.

Amenity

- BRAG have challenged the Air quality and Odour (fumes) report originally submitted related to emissions from the proposed chimneys/back-up generator. BRAG have commissioned an independent assessment (by Kalaco) to analyse the applicant's air quality report and the proposed new flues and the emissions that may be emitted from them.
- They have also provided an updated independent assessment to challenge the updated air quality and odour report. This questioned some of the results provided by the applicant's report but recommended that quantitative monitoring take place on both odour and volatile organic compounds being emitted from the lab flues once the development is operational and ideally periodically throughout its operation. In addition, it also recommended that evidence be provided that short term impacts

of the backup diesel generator emissions is not significant and requested a condition stipulating that the size, emission levels and design of the plant, and height, location and design of the flue won't differ from an appropriate assessment.

- BRAG have also suggested various conditions including the following:
 - An Odour and Emissions Management Plan should be agreed as part of any conditions.
 - Ongoing monitoring of emissions from the lab flues must be undertaken once every 6 months once these are operational, with results published and any failures (even to report) should trigger closure of the labs until compliance achieved.
 - The lab should have a limited number of solvents allowed to be used, namely: Dichloromethane, Methanol, Acetone, Acetonitrile, Ethyl Acetate.
 - Exhaust and flume vapours must emit uncontaminated at least 3m above roof level.
 - Evidence must be provided to show that short-term (1 hour) impacts of generator emissions are not significant and comply with AEGL3 thresholds. The generator must also be clean with emission levels specified and approved.
 - These conditions and restrictions should apply for Life Arc and any future occupiers, and any changes requiring further permission from the Council.
 - All Odour and Emissions Management Plan results should be published to a publicly accessible portal to allow for expert peer review (which should be funded by the occupier).

Officer's comments:

The concerns raised related to emissions and odour related to the use of some of the space being used for Level 2 containment labs are understandable. However, the revised air quality and odour report has been independently assessed by two separate companies, (one by BRAG (Kalaco) and one by Camden Council (RSK)), and the risks have been found to be extremely low.

The work being undertaken in the lab space fume cupboards are at a molecular level and therefore very small amounts of chemicals and solvents are used, with any fumes released by some of these being in microgram levels. Therefore, with extremely small levels of potential chemical evaporation and the extract flues 3m above the roof of the nearest residential property, and more than 20m away, the air quality concerns are extremely low.

Most of the work undertaken in the lab space will be governed by The Health and Safety Executive, which should give residents comfort that the work is

regulated by a recognised body, requiring the tenants to meet high levels of safety on site in undertaking their work.

Proposed conditions have been added to ensure that the flue and extract system is fit for purpose prior to the flues first being used to ensure air quality and odours are not compromised for local residents, thereby protecting their amenity. These include flue commissioning, an air quality and odour management plan and one ensuring that the diesel generator flue discharges 3m above roof level and is the tallest point in a surrounding 20m radius.

These conditions are considered to address all of the Kalaco concerns and recommendations, but not all of the BRAG suggestions.

4.3 Camden Climate Emergency

Sustainability – Carbon

- Climate Emergency Camden wants to see existing buildings retained, but in this case the level of replacement of existing construction with new construction is very high and results in a high level of harm to the environment and people, through excessive carbon emissions and the impact of resource extraction globally. It would have been possible to retain and use the existing building for office use without the extensive harms due to the new construction that have already been permitted.
- We are concerned that planning permissions of this nature are granted without any requirement provided in Section 106 agreements that the developer should meet carbon targets for the new construction (i.e. Modules A1-5 of the Whole Life Carbon Assessment). Operational carbon targets are protected by the Section 106, but not ‘embodied carbon’.
- The WLC reporting spreadsheet accompanying the original application states that the carbon intensity of the concrete will be reduced using GGBS (Ground Granulated Blast Furnace Slag).
- Similarly, the structural steel is proposed to employ a ‘high’ recycled rate. These supposed intentions are not required to be complied with via the Section 106 agreement. In addition, the developer could alter the extent of original fabric retained during construction, increasing the WLC, as this is not sufficiently tied down by the Section 106 agreement, which only states requirements to: (a) achieve the targets set out in the submission document entitled Sustainability Statement produced by Norman Disney & Young dated 13 April 2022.
- This does not include the stated proposed carbon footprint of the new construction as a target, i.e. Modules A1-5 which is given as 3,689

tonnes CO2e, or any requirement to measure and report on the actual emissions resulting from Modules A1-5 on completion of the building.

- The operational energy requirements for the whole building should be as for new build, as it does not make sense to consider the lower floors as 'refurbishment' legitimising lower performance.
- A new WLC assessment should be provided to reflect the additional construction proposed in the current application. This is missing from the current application documents uploaded on the planning website.
- The performance of the building in terms of carbon emissions produced in construction, i.e. Modules A1-5, should be an explicit target required to be met. It is currently excluded from the Section 106 agreement, and this should be rectified under this application.
- The roof is now to house an industrial plant to process these hazards, while releasing fumes i.e. pollution into the air in this densely populated residential area.
- The plant on the roof is an industrial development. The change of use is significant. Bio-labs should not be housed directly adjacent to densely populated mansion blocks, or residential houses.
- This building will be releasing fumes, storing hazardous materials and the noise from the plant on the roof and deliveries could cause further nuisance.

Officer's comments:

As embodied carbon is part a whole life carbon assessment, the Council secures this via planning condition rather than legal agreement. Officers have therefore required an updated whole life carbon report is provided within 3 months of this decision to ensure that this is updated.

The proposed use of the site for level 2 containment labs is covered in the public safety section of the comments at the start of the objections section above.

The emissions concern is also covered under both the air quality and odour section of the report below and the response to the BRAG concerns above.

Adjoining occupiers

- 4.4 Site notices were originally displayed near to the site on the 29/04/2025 (consultation end date 23/05/2025).
- 4.5 The development was also advertised in the local press on the 01/05/2025 (consultation end date 25/05/2025).

- 4.6 An amended Air Quality and Odour report was submitted by the applicants on 26/09/2025, and therefore consultations were extended a further 14 days until 03/10/2025. However, objections have continued to be submitted until as recently as 11/10/2025.
- 4.7 Objections were received from at least 58 local households. The objections received by the Council are on the Council's website. The key issues raised are:

Public safety

- Concerns have been raised in relation to the management of the proposed level 2 containment lab spaces, if anything were to go wrong in the lab, what air quality monitoring would take place, how a leak would be dealt with, and what rights do residents have to clean air?
- Inadequate public consultation regarding the health implications of biochemical research at this scale.
- This is densely populated residential area; it is near a school; there are several restaurants and cafes with outdoor areas; many visitors from the rest of the UK and abroad pass through from St Pancras and King's Cross – in short, it is entirely unsuitable as an environment for experimental biochemical research and attendant smells and toxicity.
- Concerns related to the risk of processes potentially involving toxic materials such as pathogens and poisonous solvents like benzene which must be treated or sanitised in some way before they are released as waste gaseous material such as Volatile Organic Compounds, Formaldehyde and Acid Vapours which can cause serious health issues and cell damage to humans through the air we breathe, taking place in the site, and how are these being mitigated?
- While I support the continued commercial use of this building, I strongly oppose the significant and inappropriate shift to industrial-level biochemical research. If any part of the application proceeds, robust, enforceable controls and monitoring must be imposed from the outset - not after damage has occurred.
- Concerns over a change of use from lab enabled offices to level 2 containment labs (an industrial use) and the health and safety implications related to this change, in a dense residential community.
- With Merck Sharp and Dohme (MSD) (one of Life Arc's clients) vacating the Crick Institute- could they not use that space?
- It is important to locate laboratories in hospitals and universities, in campuses dedicated to scientific research, not a building surrounded by residential dwellings and people's homes.
- Any perception that the King's Cross area is less environmentally safe is likely to deter public engagement in the area -by students, visitors and businesses. The immediate environs of 105 Judd Street encompass a

number of busy restaurants/cafes with vibrant outdoor spaces (e.g. Nonos, Half Cup, Casa Tua, Fiena, Norfolk Arms, Skinners Arms, Sandwich Street Kitchen, North Sea Fishery). Uncertainty about the environmental safety of outdoor dining could well have a measurable impact on those businesses' financial viability.

- It is my opinion that this development hasn't been adequately risk assessed in any way, and that putting such a laboratory so near to so many residents is a reckless endangerment of public health.
- I strongly object to locating a biochemical laboratory within a residential area, and especially in a residential neighbourhood of renowned historical significance, which Bloomsbury unquestionably is, if that laboratory is going to be emitting fumes.

Officer's comments:

The work being undertaken in the lab space fume cupboards are at a molecular level and therefore very small amounts of chemicals and solvents are used, with any fumes released by some of these being at microgram levels. Therefore, with extremely small levels of potential chemical evaporation and the extract flues 3m above the roof of the nearest residential property, and more than 20m away, the air quality concerns are extremely low.

Any at-all hazardous work undertaken in the lab space will be subject to the appropriate "containment level" overseen by The Health and Safety Executive but are also subject to controls by various other bits of legislation and regulations including The Health and Safety at Work Act, The Workplace Regulations and the Control of Substances Hazardous to Health Regulations, which should give residents comfort that the work is regulated by a recognised body, requiring the tenants to meet high levels of safety on site in undertaking their work.

Level 2 containment labs for research are considered to fall within use Class E, which is the same use class as the existing lab enable offices which is the approved current use. Therefore, a change of use is not required to be assessed in this application.

The proposed use will not alter the external appearance of the building and therefore will not affect the architectural or visual character of the Conservation Area. The change is internal in nature. While the activity within the building will change, it remains a research-based employment use consistent with the established academic and medical character of the wider Bloomsbury area.

Amenity – sunlight & daylight / light pollution

- Concerns related to light pollution from late night lab work within the building
- The revised scheme will worsen sunlight and daylight impacts and cause significant overbearing impact to 17 Thanet Street.
- The 3 story roof extension will already block my afternoon winter sun, which will increase my heating bills. These concerns were ignored in the original consent but please do not allow this additional request as it is likely to increase the problems this speculative build will cause a in happy, residential street.
- The loss of light and the privacy of neighbours both across Judd St and in neighbouring Thanet St is unacceptable.

Officer response:

The use of the lab space will generally follow normal office hours. The internal lights would be zoned and controlled by motion sensors, so would turn off when not in use.

The sunlight and daylight concerns related to various residents including 17 Thanet Street are understood. This topic is covered in amenity section of the report below.

Privacy from the roof terraces were covered in the original application. These are not considered to cause any greater overlooking concerns than existing residential windows, due to distance and height differential between the terraces and opposite floor levels.

Amenity – servicing and waste management

- A service/deliveries management plan is required to help reduce traffic flows and improve air quality, as the road network is not designed to accommodate the scale and frequencies of deliveries to and waste removal associated with a commercial lab operation. Deliveries will be on Thanet Street at the rear, and likely to occur outside of standard hours which may have a detrimental impact on residential amenity.
- There is insufficient information regarding the storage, handling and disposal of hazardous materials. It must be clarified whether robust safeguards and regulatory controls will be in place to manage any potential risks to health, safety and the environment.

Officer's comments:

A service management plan was agreed in the original application legal agreement. This will be amended to also cover the storage and handling of hazardous materials in addition to the waste and services management of the site.

Robust safeguards and regulatory controls in respect of any hazardous processes to be carried out on site will be administered in line with the "containment level 2" designation as overseen by the Health and Safety Executive. This is covered in section 4 of this report.

Amenity – air quality / air pollution / public safety

- Concerns that the number of proposed flues (proposed in relation to the level 2 containment labs), their close proximity to neighbouring residential properties and the emissions from them will be a health and safety risk and thereby harm residential amenity.
- The air quality and odour report submitted used the existing Life Arc site which has a rural setting, and therefore this gives little comfort that due diligence has been undertaken in the report related to this urban site. Rather, this would appear to have been included as a careless cut-and-paste exercise that diminishes residents' confidence and trust in the developers' responsibility.

Officer's comments:

The concerns raised related to emissions and odour related to the use of some of the space being used for Level 2 containment labs are acknowledged. However, the revised air quality and odour report has been independently assessed by two separate companies, (one by BRAG (Kalaco) and one by Camden Council (RSK)), and the risks have found to be extremely low.

Proposed conditions have been added to ensure that the flue and extract system is fit for purpose prior to the flues first being used to ensure air quality and odours are not compromised for local residents, thereby protecting their amenity.

Another condition also requires the backup generator flue emits at least 3m above rooftop level and is 20m from the nearest residential property.

Amenity Outlook

- The additional plant machinery including three metre flues (chimneys) on top of the additional two floors on 105-121 Judd St will block views north from Medway Court Tenants' Association Room and from residents' properties towards St Pancras Station and thereby cause a detriment to tenants and residents of Medway Court.

Officer's comments:

Although the loss of a view in this instance may occur through the additions of the 5 flues in the centre of the roof, in this location, they will be more of an interruption of a view rather than the view being completely blocked. Views are not a right, and therefore, the loss or interruption of a view in this context is unfortunate but is not considered to cause detrimental harm to the properties with a complete loss of outlook.

Amenity – Noise

- The rooftop extensions adds two additional storeys which will include substantial Mechanical Systems Plant which will limit light and could potentially create further noise pollution from the ventilation systems, etc.
- The impact of noise from plant equipment.

Officer's comments:

Conditions 12 and 13 attached to the original planning permission related to acoustic isolation for plant and plant and equipment noise will still apply to the amended scheme. These are still considered sufficient to cover the amended plant and acoustic enclosure and will be retained on the amended decision notice.

Amenity - General

- It is hard to comprehend how the proposed amendment which involves the introduction of industrial biochemical operations that may involve the release or dispersal of unknown or unregulated gases or particles into the surrounding environment satisfies Point 6, Policy A1 of the Camden Local Plan sections a-n, most notably: Ensure the amenity of neighbours (a), visual privacy outlook (e), sunlight, daylight and overshadowing (f), noise and vibration levels (j), odour fumes and dust (k).
- Any extension to the initially approved three-level extension to further increase elevation to the building is quite ridiculous. It presents additional

personal and privacy risk to residents particularly in Jessel House but also in Thanet Street & Hastings Street. These areas would not only look directly into the residents' properties, severely impacting visual privacy, it would also irrevocably impact residents right to sunlight, daylight and overshadowing as detailed in Policy A1 under Point 6 of the Camden Local Plan.

Officer's comments:

These points have been covered in other amenity points here and are also covered in the amenity section of the report below.

Sustainability - Scope of the application

- As works have commenced on site, there are questions over whether the original proposals are being implemented in accordance with the approved plans as there appears to have been more demolition on site than was approved in the 2022 approved plans, with less of the building retained than as approved.
- This raises questions over whether the original planning documents in relation to Energy and the Circular Economy can be relied upon, whether the proposed amendments can be considered against a planning permission, not being built in accordance with the approved plans, whether the original planning permission would have been granted based on the additional extent of demolition that has taken place, whether the extent of unlawful demolition warrant an investigation by the Council's Planning Enforcement team and whether the extent of additional demolition was to facilitate the proposed use of the intended occupier – LifeArc?
- The reality is that 75% of the exterior has perhaps been retained but the entire interior, including the unusually high floor levels has been demolished. The building has been gutted. As for the windows, some will now be infilled, and new louvres are proposed to fulfil the potential tenant's requirements. It was utterly misleading and economical with the truth to claim that the existing building was to be 'retained and reused'.

Officer's comments

It is understood that a further 2% of the building is proposed to be removed on the 1st floor slab reducing the retention figure down to 73% of the original compared with 75% as indicated in the approved application. Officers consider that, this is unlikely to represent a material change.

However, the applicants have confirmed that additional demolition beyond this 2% has been required to take place, totally another 4%, but this was only understood so late in the life of the application that it couldn't be assessed in this current s73. Therefore, a separate S96A (non-material amendment) application will be submitted to enable this matter to be assessed properly and does not form part of this S73 application.

Section 5 of this report covers this in more detail.

Design and heritage

- I object to the height of the building and the massive increase in size.
- Disruption to the appearance and height of the building should be kept to an absolute minimum, and any potentially toxic emissions or noisy, permanent generators should be strictly forbidden.
- This flies in the face of the Council's own planning policy DP25, which states that 'In order to maintain the character of Camden's conservation areas, the Council will (g) not permit development that it considers would cause harm to the setting of a listed building'. The dwellings adjacent on Judd and Thanet Streets are just such listed properties. This is not an industrial quarter, and such development would be far more suited to the research or hospital area around UCL.
- The proposed rooftop flues (3 metres high) will be visible from surrounding conservation buildings and undermine the historic character of the Bloomsbury Conservation Area. This contravenes Camden's own policy DP25, which is designed to protect the setting of listed buildings.
- I object to the total disregard for the Georgian streetscape and heritage of the area that will result from the addition of extra storeys to accommodate plant on the roof and five 3m tall chimneys.
- Camden Council's policy [DP25] reflects the broader principle that development should not negatively impact the character and appearance of conservation areas, including the setting of listed buildings, unless there are compelling public benefits to outweigh the harm to heritage assets.
- There are 25 Grade II listed buildings situated immediately adjacent to 105 Judd Street: the two-storey terrace of 17 houses on Thanet Street and 8 three-storey houses on Judd Street.

Officer's comments

The proposed changes are minimal and largely at roof level and are therefore not considered to harm the character or appearance of the conservation area, or the setting of the adjacent listed buildings.

The proposed use will not alter the external appearance of the building and therefore will not affect the architectural or visual character of the Conservation Area. The change is internal in nature. While the activity within the building will change, it remains a research-based employment use consistent with the established academic and medical character of the wider Bloomsbury area. The proposal would not alter the mixed institutional and residential character that defines the Conservation Area.

Support and other comments

- I support the proposal for LifeArc's laboratory. Keytruda is one of the drugs they have developed a wonderful drug used in treating aggressive cancers, which is one of the most transformative medicines probably ever discovered. Unfortunately, making the discoveries for new medicines often requires understanding disease using human tissue from hospitals (with patients consented). Modern sequencing technologies require tissues that are fresh, and therefore companies to be located near hospitals (otherwise the research can be lost), often in the centre of large cities.
- As an NHS doctor with a PhD in biology, I have extensive experience working in research and clinical diagnostic lab facilities and understand the infrastructure requirements and safety protocols involved. I trust that Camden Council will ensure appropriate environmental and health and safety monitoring for any development, whether laboratory, hotel, or otherwise.
- Expanding our biomedical research capacity in the Knowledge Quarter is vital for scientific advancement and economic growth.
- The recent failure to deliver the proposed Merck development at Belgrove House does not suggest an inexhaustible appetite for Life Science research facilities in the area. Should Camden not undertake a responsible overview and analysis of the market need before encouraging such initiatives any further?

Officer's comments

Officers welcome the supporting comments shared above from persons in the medical world about the type of research proposed to be undertaken in the building and the need for further facilities in the Knowledge Quarter located close to other scientific and medical research establishments and hospitals located close by.

The Knowledge Quarter attracts life science uses to the area, largely because other similar uses are already located in the area, and therefore the market need for more initiatives in the local area are driven by either need or demand

for facilities of this nature, often due to their close proximity to each other and hospitals where treatment can be carried out.

5.0 POLICY

National and regional policy and guidance

National Planning Policy Framework 2024 (NPPF)

National Planning Practice Guidance (NPPG)

London Plan 2021 (LP)

London Plan Guidance (LPG)

Accessible London SPG

Planning for Equality and Diversity in London SPG

Characterisation and Growth Strategy LPG

Optimising Site Capacity: A Design-led Approach LPG

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 G1 Delivery and location of growth

Policy H1 Maximising housing supply

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

Policy H4 Maximising the supply of affordable housing

Policy C1 Health and wellbeing

Policy C2 (Community facilities)
Policy C5 Safety and security
Policy C6 Access for all
Policy E1 Economic development
Policy E2 Employment premises and sites
Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy A4 Noise and vibration
Policy 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 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 TC1 (Quantity and location of retail development)
Policy DM1 Delivery and monitoring

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

Access for All CPG - March 2019

Air Quality - January 2021

Amenity - January 2021

Design - January 2021

Developer Contribution CPG - March 2019

Employment sites and business premises - January 2021

Energy efficiency and adaptation - January 2021

Housing - January 2021

Transport - January 2021

Trees CPG - March 2019

Water and flooding CPG - March 2019

Other guidance:

Draft Site Allocations Plan 2020

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Draft Camden Local Plan (DCLP)

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.

6.0 ASSESSMENT

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

7	Land use
8	Neighbour Amenity
9	Design and heritage
10	Sustainability
11	Trees, greening and biodiversity

12	Flood Risk
13	Transport
14	Accessibility
15	Employment
16	Fire Safety

7.0 LAND USE

7.1 Policy G1 of the Local Plan expects development to take place throughout the borough with the most accessible growth expected to be delivered through:

- The growth areas of King’s Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road; and
- Other highly accessible locations, in particular Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead.

7.2 Policy E1 of the Local Plan seeks to direct new office development to the growth areas mentioned above, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. The policy also seeks to support the development of Camden’s health and education sectors and promote the development of the Knowledge Quarter around Euston and King’s Cross.

7.3 The application site is an existing office building (Class E) located within the Central London Area and the Knowledge Quarter Innovation District. The approved development would deliver 1,872sqm GIA of additional office floorspace at the site and the entire building would be fitted out to accommodate Knowledge Quarter uses. It was understood that these offices would be “lab enabled” and as such, the proposed increase in office floorspace is considered acceptable and would be in accordance with Policy E1 of the Local Plan.

7.4 The amended scheme seeks to ensure that some of this lab enabled office space, can be used as a Level 2 laboratory space. This is still considered to fall within Class E which is both the existing and approved use of the building. Officers note that there has been a great deal of public interest and objections raised related to the proposed up-scaling of the lab enabled office space to become Level 2, however, these Level 2 lab spaces could be fitted out without any requirement to change the use of the building. Therefore, in planning policy terms, the proposed changed from lab enable offices to actual lab space doesn’t need to be assessed as they fall within the same use class. Issues related to public health concerns resulting from their inclusion are addressed in the amenity and air quality sections of this report.

- 7.5 Policy H2 of the Local Plan promotes a mix of uses in new developments, including a contribution to the supply of housing. In the Central London Area, where development involves additional floorspace of more than 200sqm (GIA), the Council requires 50% of the additional floorspace to be provided as self-contained housing. This is required to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Policy H4 (Maximising the supply of affordable housing) sets out when we will seek affordable housing, and the quantity and type of affordable housing we expect. Parts b) and g) of Policy H4 are particularly relevant to the current scheme.
- 7.6 The amended scheme seeks to ensure that some of this lab enabled office space, can be used as a Level 2 containment laboratory space. The use of lab space is still considered to fall within Class E of the Use Classes Order, which is both the existing and approved use of the building. Officers note that there has been a great deal of public interest and objections raised to the proposed up-scaling of the lab enabled office space to become Level 2 containment labs, however, because there is no material change of use, these Level 2 lab spaces could be fitted out without any change to the approved land use for the building. Therefore, in planning policy terms, the proposed change from lab enabled offices to actual lab space does not need to be assessed, as they fall within the same use class. Issues related to public health concerns resulting from these labs are addressed in the amenity section of this report.

8.0 IMPACT ON NEIGHBOURING AMENITY

- 8.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. 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 occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.
- 8.2 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.”

Air Quality and Odour

- 8.3 The vast majority of the objections for the amendment proposals are linked to the proposed change from lab enabled offices to Level 2 containment labs on

floors 1 and 2, and the associated perceived risks that the use of these labs will bring in relation to air quality and odour generated from the proposed new flues at roof level, and also the testing of the back-up generator proposed. Containment labs cover levels 1-4, with 4 being used for lab work using the more dangerous diseases and chemicals.

- 8.4 The work undertaken in these labs relate to life sciences, with their tenant undertaking work to develop drugs connected to this field. The works therefore centre around testing new medicines at the molecular level on existing diseases, hence the need for the labs to be Level 2. In reality, this means very small amounts of chemicals being used at any one time to test molecules linked to existing diseases. The applicants have produced a revised report prepared by Tetra Tech explaining the air quality and odour proposed to be generated by the amended scheme, based on their existing site. The location and context of the sites differ, but what is undertaken in the labs and the emissions from the proposed flues are exactly the same. This report has been independently analysed by both Kalaco on behalf of BRAG, and RSK on behalf of the Council. Both have flagged several issues which are considered low risk, which can be addressed through planning conditions.
- 8.5 The Kalaco report commissioned by BRAG questioned some of the results provided by the applicant's report (by Tetra Tech), in particular with reference to how Tetra Tech defined emissions rates and a critique of its odour testing robustness, suggesting they were pointless, and why odour rates weren't undertaken at the existing Life Arc facility even if just to corroborate the assumption that odours would be below the limit of detection at the outlet.
- 8.6 Despite this critique, Kalaco agreed that based on the information provided (and assuming the VOC recovery system is working effectively) it is considered very unlikely that odours from the flues will result in significant adverse effects at local resident's properties.
- 8.7 Kalaco recommended that planning conditions were agreed to ensure quantitative monitoring takes place on both odour and volatile organic compounds being emitted from the lab flues once the development is operational and ideally periodically throughout its operation. In addition, they also recommended that evidence be provided that short term impacts of the backup diesel generator emissions are not significant and requested a condition stipulating that the size, emission levels and design of the plant, and height, location and design of the flue won't differ from an appropriate assessment.
- 8.8 Officers have therefore proposed conditions to ensure that the flue and extract system is fit for purpose prior to the flues first being used to ensure air quality and odours are not compromised for local residents, thereby protecting their amenity. These include flue commissioning, an air quality and odour

management plan and ensuring that the diesel generator flue discharges 3m above roof level and is the tallest point in a surrounding 20m radius.

- 8.9 Any work undertaken in the lab space will be subject to the appropriate “containment level” overseen by The Health and Safety Executive but are also subject to controls by various other bits of legislation and regulations including The Health and Safety at Work Act, The Workplace Regulations and the Control of Substances Hazardous to Health Regulations to name but a few, which should give residents comfort that the work is regulated by a recognised body, requiring the tenants to meet high levels of safety on site in undertaking their work and therefore the tenants will need to adhere to all of the guidance and governance set out by them. However, the applicants have agreed to a pre-commencement condition requiring the flues to be tested to ensure that the processes being undertaken inside the labs and the emissions discharged are satisfactory before the flues are used properly. Officers and the Council’s independent Environmental Health auditor (RSK) agree that this procedure would be enough to satisfy them that an ongoing monitoring condition would not be considered necessary.

Sunlight / Daylight

- 8.10 The overall height of the plant enclosure screen on the main roof would be 0.26m higher than the previously approved scheme when measured from the top of the plant screen enclosure with the flues emerging a further 3m above this. However, the main concern has been raised by a property in Thanet Street adjacent to the site which is close to the additional bulk and massing of the re-designed stair core at 2nd and 3rd floor levels, which has been re-designed to meet fire regulations. The amendment moves some of the bulk of this fire stair closer to the southern corner of the of the building in order to accommodate these necessary fire safety concerns, however, it is acknowledged that this results in a little more bulk to this part of the roof.
- 8.11 The applicants have provided a comparison analysis for the sunlight and daylight of the as approved and as proposed scheme. Only two properties fall short of the BRE guidance out of the 13 properties assessed, namely Thanet House and Sinclair House. Under the variation hereby proposed, an additional 3 windows fall marginally short of the BRE guidelines for the Vertical Sky Component test. One of these windows retains a VSC value of 25% (against a BRE recommendation of 27%), with the remaining two experiencing reductions of 21%, which is just over the 20% threshold of noticeability. Overall, all affected windows will experience an absolute reduction of between 0-1% compared to the consented development, which is unlikely to result in a perceivable difference to occupants. Therefore, officers accept that the sunlight and daylight

impact for the proposed amended scheme will have minimal impact to all neighbouring buildings.

Outlook

- 8.12 The loss of outlook has been raised in some objections related to views being blocked or interrupted from upper floor windows, when looking towards St Pancras or across the Camden skyline by the introduction of the 5 flues on the roof. In this instance, these views still exist, but the proposal seeks to add additional structures to the roof of the extended plant enclosure (namely the flues), and it is considered that these might only partially interrupt those views, rather than block them entirely across the rooftops of this part of Camden. It is noted that there is no right to a view over someone else's land, in terms of outlook what is assessed is any overbearing physical impact to neighbouring properties. In this case, we do not consider there is any overbearing physical impact that would cause material harm to the outlook of nearby residences.

Overlooking

- 8.13 The original roof terrace areas were fully assessed in the previous (2022/1817/P) application report. These were considered to be acceptable because they were at least 15m away from neighbouring residential windows and due to the height differences between the windows and terrace would not cause direct overlooking. There are no proposed changes to the roof terrace areas within this amended proposal that would change the previously assessed overlooking concerns raised in the original 2022 application.

Noise/Vibration

- 8.14 The original scheme was conditioned to protect residential amenity from noise both from the roof terraces (condition 10 – hours of use and condition 11 – terrace noise) and also from the plant on the main roof (condition 12 – acoustic isolation and condition 13 – noise compliance). These four planning conditions are considered sufficient to mitigate any harmful impacts and would be retained and attached to this permission if granted.

Use of lights

- 8.15 One objection has raised concerns related to the use of the building late in the evening, and potential light pollution. The Council understands that the use of the building will be for normal office hours, but with some use of the circulation space being used for events into the evening. The hours of use of the offices will generally be normal office hours and the office lights are on sensors which turn them off when the office is not being used.

- 8.16 A key reason for the tenant wanting to occupy this building in this location is how it could be used for events with its life science partners. These would take place on part of the ground and first floors, primarily at the Judd Street side of the building. Events could take place during the day and into the evening. They would be managed solely by the tenant and would not be open to private hire.

Deliveries and waste management

- 8.17 One concern raised by local residents is the management of waste collections and deliveries during the working day, and the safe storage of the various chemicals required by the tenant to undertake their work in the building. Condition 19 is already attached to the parent consent Ref: 2022/1817/P which covers waste storage and there is a clause in the existing legal agreement already covering the management of deliveries. This can be amended in the deed of variation to the legal agreement to also cover waste collection and chemical deliveries as well.

9.0 DESIGN AND HERITAGE

- 9.1 Local Plan Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area. Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- 9.2 The as approved scheme (Ref: 2022/1817/P) permitted refurbishment of the host building and extensions to the third floor with the erection of a two-storey roof extension (plus plant enclosure) to create a new fourth and fifth floor level at the site. The approved design went through extensive pre-application process and review by the independent Design Review Panel and was considered to represent a high-quality design that respects the original character and proportions of the host building and preserves the character and appearance of the surrounding Bloomsbury Conservation Area. Although there is a perceivable difference as seen in Figure A below, in principle the design is considered to be very similar.
- 9.3 In the 2022/1817/P committee report the application site was considered to represent a transitional site in this particular part of the conservation area where the low level Georgian Terraces are replaced by large commercial and mansion block buildings which vary between 5 and 7 storeys in height. As such, the erection of two additional storeys at the site, which would create a six storey building overall, is considered to represent a proportionate form of development that would sit comfortably within its setting. Therefore, whilst the proposed extensions would be seen in short and longer range views from the public

realm, particularly along Judd Street and Thanet Street, they are considered to blend in with the surrounding townscape and make a positive contribution to the appearance of the host building and wider area.

- 9.4 In addition the 2022 report considered that the concerns of the Bloomsbury CAAC with regard to the overbearing impact of the proposed extension on the setting of the adjoining Grade II listed terraces to the south, particularly the two-storey properties on Thanet Street. As such, the proposed roof extensions were purposely set back on the southern side in order to provide further relief to the neighbouring terraces of residential properties. The mansard style sloping roof design also helps to further soften this impact to these properties. As such, the size, scale, design and set back of the proposed extensions were considered to represent carefully formed and sympathetic additions that would maintain rather than harmfully exacerbate the existing difference in heights between the host and neighbouring buildings. As such, the additions to the roof were not considered harmful that required public benefits to outweigh that harm.
- 9.5 The changes that are part of this amendment include changes to the design and size of the rooftop plant enclosure, new louvers at lower ground, and first floor levels (some integrated into some upper sash windows), frosted glazing to 3 windows (facing Hastings Street and Thanet Street), installation of 5 flues in the middle of the amended roof plant enclosure (projecting 3m above the height of the plant enclosure), a new external access ramp re-introduced to the main entrance on the corner of Judd Street and Hastings Street, an extension to the southwest stair core from third to fifth floor level (to meet fire requirements for the building) and some minor changes to the ground floor treatment at the Thanet Street frontage.
- 9.6 The changes proposed to the plant enclosure on the roof are considered to be the most significant and include an additional 80sqm of screened plant area (total 520sqm). The change would increase the height of the enclosure by 0.26m (to 3.33m high) and the five new flues would extend a further 3m above this. The additional bulk and massing added through the plant enclosure changes, make the plant enclosure more visible from street level, as demonstrated in the representative views in the submission particularly from Hastings Street and in longer views along Judd Street when looking north. However, the architectural treatment to the plant screening that is now more visible has been enhanced, with articulation through fins and material variety, and as a result of these design improvements, the additional bulk and height is still considered acceptable and not considered to harm the character or appearance of the Bloomsbury Conservation Area.
- 9.7 The provision of the five new flues located in the centre of the roof level are also considered acceptable, as it is understood that these will have very limited

visibility from street views and that they are being designed carefully in an ordered arrangement in the centre of the roof with limited structure above plant screen level. Therefore, these are also considered acceptable.

- 9.8 The extension of the southwest second stair core is considered necessary for fire safety purposes. These changes include some additional bulk and massing of the re-designed stair core at 2nd and 3rd floor levels on the southern corner on Thanet Street, which has been re-designed to meet fire regulations. The amendment moves some of the bulk of this fire stair closer to the southern corner of the of the building, which does result in greater visual prominence. However, this is a moderate increase in the massing when compared to the consented scheme, and it is not considered the harm the character or appearance of the conservation area.
- 9.9 Various other changes include the provision of new louvers in existing openings at lower ground, ground and first floor levels, infilling of some windows on the south facing (non-street facing) windows, adjustment of the levels of the main entrance plinth for alignment with internal levels, the extension of the bridge link over the existing lightwell facing Thanet Street, the widening of a single door to a double door also facing Thanet Street and works to the south and west parapet in brickwork and stone. All of these proposed amendments are considered acceptable; they improve the overall design of the scheme and are not considered to cause harm to the character or appearance of the conservation area.
- 9.10 The loss of the café within the front foyer area of the original scheme does have an impact on the activation of the street frontage. However, this was proposed as an ancillary use of the front entrance lobby space in the original submission rather than a specific café use in its own right. Therefore, although its loss is a loss to potential street activation, it is not considered to harm the character or appearance of the Bloomsbury Conservation Area.
- 9.11 Overall, the proposed design changes in this s73 amendment are considered relatively minor which are still not considered to cause harm to the listed buildings located to the south of the site, nor are they considered to harm the character or appearance of the Bloomsbury Conservation Area.

10.0 SUSTAINABILITY AND ENERGY

- 10.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

- 10.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Percentage of retention of original building

- 10.3 The original scheme proposed to retain 75% of the original building which was based on surveys undertaken in an occupied building, however, when vacant possession was taken, more thorough foundation investigations revealed the ground beneath the building to be softer than expected and therefore the planned structural foundations were no longer considered suitable for the weight of the roof extension. For this reason, the existing basement slab and foundation have had to be removed and a raft foundation fitted to help spread the load across the whole building. Officers have considered this additional demolition carefully and consider that in the circumstances, this could be considered as a non-material amendment, however this was raised too late in the process to include in this current s73 application (hereby being assessed). Therefore, the applicants have been invited to submit a further s96a (non-material amendment) application to cover this additional basement demolition. Therefore, although concerns have been raised by local residents, this matter will be assessed in a separate future submission to amend the scheme.
- 10.4 In addition, an atrium area is now proposed between ground and first floor level, which is achieved by removing some of the existing first floor slab within the existing building. This is included in the current submission application documents and this additional demolition would remove 55m³ of floor area.
- 10.5 Policy CC1 seeks to require all development to minimise the effects of climate change and encourages all development to meet the highest feasible environmental standards, which is assessed on a case by case basis, rather than developments having to hit a minimum baseline. Therefore, provided the development can justify the requirements to reduce the retained percentage of material on site, then this would meet the policy requirement. In this case, there is a proposed reduction of 2% overall compared the originally envisaged retention of 75%. Overall, a 73% retention in the original building materials is still considered to be acceptable.

Carbon Reduction

- 10.6 With regard to CO₂ reductions, the original scheme was assessed and the Council's Energy and Sustainability Officer satisfied that the development would achieve a 54% reduction in CO₂ emissions, which significantly exceeds

the minimum 35% reduction requirement. This figure has been revised downwards to 36.6% site wide in the amended scheme, but this figure is still considered to be acceptable.

- 10.7 Local group Climate Emergency Camden consider that the amended scheme has a high level of replacement construction and therefore this results in a high level of harm to the environment. They have also commented that the s106 agreement didn't provide a requirement for the developer to meet carbon targets for the new construction in relation to embodied carbon, rather than the targets set out in the parent application's (ref: 2022/1817/P) Sustainability Statement. They claim this fails to include the proposed carbon footprint as a target. In addition, they consider that the operational energy requirements should be as for a new build, as it does not make sense to consider the lower floors as refurbishment, which legitimises lower performance.
- 10.8 They therefore consider that a new whole life carbon assessment should be provided to reflect the additional construction proposed through the amended scheme. They also seek that the emissions targets produced through construction should be secured through the s106 legal agreement.
- 10.9 As embodied carbon is part a whole life carbon assessment, the Council secures this via planning condition rather than legal agreement. Officers have therefore required an updated whole life carbon report is provided within 3 months of this decision to ensure that this is updated.
- 10.10 That said, the Council secured a carbon offset payment of £192,375 in respect of the London Plan zero carbon target and based on the current carbon offset rate of £2,850/tonne in the original scheme. Carbon offset payments are sought when a Local Planning Authority is satisfied that a particular development has maximised on-site reductions, but the development is still falling short of achieving net zero carbon. This payment will be secured as part of the associated s106 DOV legal agreement.

Use of renewables

- 10.11 There is an increase in cooling demand within the amended scheme due to the introduction of specialist laboratory spaces, which require significantly more cooling than standard lab-enabled office accommodation.
- 10.12 To offset this increase in energy use, officers requested the inclusion of photovoltaic panels (PVs) to help meet the policy target of a 20% reduction in carbon emissions through on-site renewable energy. However, the available roof area is limited, and installing PVs would require the removal of the proposed green roof. On balance, officers consider it acceptable to proceed without PVs in order to retain the biodiversity and sustainable drainage benefits provided by the green roof.

11.0 TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 11.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation. This approach is supported by LP 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.
- 11.2 There have been no alterations in relations to trees and landscaping in the amended scheme and therefore the overall scheme is still policy compliant.

Statutory Biodiversity Net Gain

- 11.3 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 11.4 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.
- 11.5 The amended scheme falls into one of the exemption categories for BNG because the application is submitted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.

12.0 FLOOD RISK AND DRAINAGE

- 12.1 Camden Local Plan policy CC3 is relevant with regards to flood risk and drainage. Part (e) requires development to utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible.
- 12.2 There have been no alterations in relations to SuDS in the amended scheme and therefore the overall scheme is still policy compliant.

13.0 TRANSPORT

- 13.1 Camden Local Plan policies T1, T2, T3 and T4 and Supplementary Guidance Document CPG (Transport) are relevant with regards to transport issues. The overarching aims of the Council's transport policies is to consider the impacts of movements to, from and within a site, including links to existing transport networks.
- 13.2 The only concerns raised in relation to the proposed amendments are seeking further clarity on the service management plan that was submitted as part of the original scheme. A service management plan covering deliveries and managing potential conflicts with pedestrians and limited parking arrangements in the area was a clause required to be discharged under the original s106 agreement. This has yet to be discharged , but it is already included in the s106 and will address concerns raised by residents in Thanet Street. Now that a specific tenant has been engaged to take on the property, officers will seek that this also includes the handling of toxic materials.

14.0 ACCESSIBILITY

- 14.1 Policy C6 of the Local Plan seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.
- 14.2 The approved scheme provides an increased permeability of the ground floor with a reactivated street frontage, whilst main level access is provided from Judd Street including a publicly accessible café within the reception area of the proposed development.
- 14.3 The secondary entrances from Thanet Street are also provided step-free with the level difference between entrances on the ground floor resolved with internal ramps. Internal circulation is provided to conform with modern standards including new lifts to access all floors. The small changes made in the amended scheme retain all of the above and therefore with regards to accessibility the amendments comply with policy C6.

15.0 EMPLOYMENT AND TRAINING OPPORTUNITIES

- 15.1 The proposed development is considered large enough to generate local economic benefits. Camden Local Plan policies E1 and E2 and Camden Planning Guidance (Employment Sites and Business Premises) state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.

- 15.2 The end user has also updated its offer of providing 102sqm of affordable workspace as part of this amendment application. The offer firstly changes the location of the affordable workspace within the site from the basement, to the first floor and secondly changes the offer of letting this out at 50% of market rate for 20 years, to free of charge for 20 years. In addition, the end use apprenticeships have also seen an improved offer from the end user. This has been changed from the recruitment and provision of two end use apprenticeships per year following occupation of the development for a 5-year period and change to a 10-year period following occupation.
- 15.3 These amended proposals are all considered a welcome improvement to the planning benefits of the scheme and will be included in the approved plans and secured via the deed of variation to the legal agreement.

16.0 Fire safety

- 16.1 The application also seeks to amend condition 20 related to the Fire Safety report which was submitted with the original scheme. This has been updated to reflect a new fire safety report submitted with this amendment in light of the changes made to the design of the building to ensure the staircase in the southern corner meets current fire regulations.
- 16.2 Camden's Building Control department have assessed the updated fire statement and consider that it is satisfactory and therefore this condition can be amended in line with the revised statement.

17.0 COMMUNITY INFRASTRUCTURE LEVY (CIL) AND SECTION 106 OBLIGATIONS

- 17.1 The proposal would be not be liable for Camden or the Mayor of London's CIL as no additional floorspace will be generated as a result of the development.
- 17.2 The application would be subject to a Deed of Variation transferring the previously approved S106 legal agreement to this application. Whilst the information contained within the documents submitted for the S106 may be updated to reflect the extended time for provision of end use apprenticeships (from 5 to 10 years) the location change for the affordable workspace within the building and making reference to chemical deliveries within the serving and management plan provisions, the clauses remain unchanged from the previously issued consent.

18.0 CONCLUSION

- 18.1 Overall, the proposed amendments are considered to be carefully designed. Although there is some minimal increase to the scale and massing to the plant enclosure to the roof, this has been balanced with design changes to the plant enclosure to help improve its design as it becomes more visible from the street as a result of its increase in size. These changes result in no harm to the Bloomsbury Conservation Area, or the setting of the adjacent listed terrace facing Judd Street.
- 18.2 The change of activity from lab enabled offices to level 2 containment labs on 2 floors of the amended scheme is not considered to be a change of use within the Class E use class. The use remains within Class E and is a suitable ongoing use for Life Sciences within the Knowledge Quarter in Camden.
- 18.3 Public safety and some amenity concerns have been raised in relation to flue emissions (air quality and odour) which have been addressed through planning conditions and a variation to the legal agreement to accommodate flue emissions testing, air quality and odour through a management plan and securing the location of the flue in relation to the back up diesel generators.
- 18.4 The other main benefit relates to employment and training which now include the relocation of the affordable workspace to the first floor, alongside this now being made available at £0 rent for 20 years. In addition, the end use apprenticeships will last for 10 years and not 5 years.
- 18.5 The amended scheme is therefore considered to comply with the development plan as a whole and is recommended for approval subject to a deed of variation of the S106 agreement and amended planning conditions.

19.0 RECOMMENDATION

- 19.1 Grant conditional Planning Permission subject to a Section 106 Deed of Variation to include the following amended heads of terms.
- Apprenticeships extended from 5 to 10 years post occupation;
 - Affordable workspace plan amended to change the location of the provision from basement to first floor within the building;
 - Reference to chemical deliveries within the serving and management plan.
- 19.2 And subject to planning conditions.

20.0 LEGAL COMMENTS

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

21.0 CONDITIONS

- 1 The development hereby permitted must be begun not later than the end of three years from the date of the original planning permission ref 2022/1817/P dated 10/05/2023.

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

- 2 For the purposes of this decision, condition no.2 of planning permission 2022/1817/P shall be replaced with the following condition:

REPLACEMENT CONDITION 2

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

4608-07-EX-304 A, 4608-07-EX-301 A, 4608-07-EX-204 A, 4608-07-EX-203 A, 4608-07-EX-202 A, 4608-07-EX-201 A, 4608-07-EX-105 A, 4608-07-EX-104 A, 4608-07-EX-103 A, 4608-07-EX-102 A, 4608-07-EX-101 A, 4608-07-EX-100 A, 4608-07-EX-099 A, 4608-ST-EX-01-101 A, 4608-ST-EX-00-001A, 4608-07-DM-105 A, 4608-07-DM-103 A, 4608-07-DM-102 A, 4608-07-DM-101 A, 4608-07-DM-100A, 4608-07-DM-099 A, 4608-07-DM-204 A, 4608-07-DM-203 A, 4608-07-DM-202 A, 4608-07-DM-201 A, 4608-07-GA-100 Rev C; 4608-07-GA-101 Rev B; 4608-07-GA-102 Rev B; 4608-07-GA-103 Rev B; 4608-07-GA-104 Rev B; 4608-07-GA-105 Rev B; 4608-07-GA-106 Rev B; 4608-07-GA-120 Rev A; 4608-07-PR-201 Rev D; 4608-07-PR-202 Rev C; 4608-07-PR-203 Rev D; 4608-07-PR-204 Rev C; 4608-07-PR-210; 4608-07-PR-211; ST-07-PR-301 Rev B; ST-07-PR-302 Rev B; ST-07-PR-310, 4608-ST-07-GA-120D, 4608-31-PL-208A, 4608-31-PL-207A, 4608-31-PL-206A, 4608-31-PL-205A, 4608-07-PR-204G, 4608-07-PR-203G, 4608-07-PR-202F, 4608-07-PR-201G, 4608-07-PR-302E, 4608-07-PR-301E, 4608-07-GA-106E, 4608-07-GA-105E, 4608-07-GA-104E, 4608-07-GA-103E, 4608-07-GA-102E, 4608-07-GA-101E, 4608-07-GA-100G, 4608-07-GA-099A, 4608-07-DM-105A, 4608-07-DM-103A, 4608-07-DM-102A, 4608-07-DM-101B, 4608-07-DM-100B, 4608-07-DM-099A, 4608-07-DM-204A, 4608-07-DM-203A, 4608-07-DM-202A, 4608-07-DM-201A, 4608-07-EX-304A, 4608-07-EX-301A, 4608-07-EX-204A, 4608-07-EX-203A, 4608-07-EX-202A, 4608-07-EX-201A, 4608-07-EX-105A, 4608-07-EX-104A, 4608-07-EX-103A, 4608-07-EX-102A, 4608-07-EX-101A, 4608-07-EX-100A, 4608-07-EX-099A, 4608-ST-EX-01-101A, 4608-ST-EX-00-001A, 4608-07-PR-210C, 4608-07-PR-211C

Background Papers and Supporting Documents: Flood Risk Assessment & SUDS Strategy Parts 1-7, Phase 1 Land Contamination Report 11121-A2SI-XX-XX-RP-X-0001-00, Townscape, Heritage and Visual Impact Assessment

March 2022, Air Quality Assessment and Odour v5 October 2025, Statement of Community Involvement April 2022, WLCA 13th April 2022, Energy Statement Parts 1-3 13th April 2022, Circular Economy Statement 13th April 2022, Preliminary Ecological Appraisal February 2022, Urban Greening Factor February 2022, Biodiversity Impact Assessment April 2022, Planning Statement April 2022, Operational Waste Management Strategy March 2022, Transport Statement March 2022, Sustainability Statement 13th April 2022, Structural Planning Report parts 1-9, Noise Assessment April 2025, Fire Statement April 2025, Draft Employment, Skills and Supply Plan, GIA Daylight & Sunlight Assessment parts 1-2, Gerald Eve cover letter 12th April 2022, Assessment of development proposals which would accord with BRE Daylight Guidance 28/07/2022. Townscape, Heritage and Visual Impact Assessment April 2025, Odour Impact Assessment April 2025, Daylight and Sunlight Letter of Conformity and Appendices April 2025, Section 73 Amendments Design Pack April 2025, Statement of Community Involvement April 2025.

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

3 Detailed drawings/samples

Prior to commencement of the relevant part of the development, detailed drawings, information or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council:

a) Plan, elevation and section drawings, of all external windows, window reveals and doors at a scale of 1:20;

b) Samples and manufacturer's details at a scale of 1:20, of all facing materials including windows and door frames, glazing, brickwork and cladding;

A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and each development shall be carried out in accordance with the approval given.

c) Details of all hard and soft landscaping within the public realm;

d) Details of landscaping features and plant species to be incorporated within the roof terraces;

e) Details of proposed CCTV and lighting strategy

The relevant part of the works shall then be carried in accordance with the approved details.

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

4 Landscaping - replacement planting

All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development. Any trees or areas of planting 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.

5 Tree protection

Prior to the commencement of any works on site, details demonstrating how trees to be retained shall be protected during construction work shall be submitted to and approved by the local planning authority in writing (as already approved under ref: 2023/2058/P, this must be complied with unless otherwise agreed in writing). Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details.

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

6 External fixtures

No meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings.

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

7 Air quality - construction impacts

Air quality monitoring shall be implemented on site. No development shall take place until:

a. prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing (as already approved under ref: 2023/2080/P, this must be complied with unless otherwise agreed in writing). Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;

b. prior to commencement, evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date. The monitors shall be retained and maintained on site for the duration of the construction work in accordance with the details thus approved (under ref: 2023/4745/P, this must be complied with unless otherwise agreed in writing).

Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 (Managing the impact of development) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.

8 Non-road mobile machinery

All Non-road Mobile Machinery (NRMM) used during the course of the development that is within the scope of the GLA 'Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (SPG) dated July 2014, or any successor document, shall comply with the low emission zone requirements therein and be registered for use on the NRMM register (or any superseding register).

Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017, and policy 7.14 of the London Plan and the Mayor's SPG: The Control of Dust and Emissions During Construction and Demolition.

9 Land contamination - site investigation

Prior to commencement of any development other than works of demolition, site clearance & preparation, a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas shall be submitted to and approved by the local planning authority in writing.

Site investigation shall be carried out in accordance with the approved programme and the results and a written scheme of remediation measures [if necessary] shall be submitted to and approved by the local planning authority in writing.

The remediation measures shall be implemented strictly in accordance with the approved scheme and a written report detailing the remediation shall be submitted to and approved by the local planning authority in writing prior to occupation (as approved under ref: 2023/2052/P, this must be complied with unless otherwise agreed in writing).

Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial / storage use of the site in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.

10 Roof terrace hours

The proposed roof terraces hereby approved shall only be accessed between the hours of 08:00 and 20:00 Monday to Friday.

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

11 Roof terrace noise

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

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1, and A4 of the London Borough of Camden Local Plan 2017.

12 Plant and equipment - acoustic isolation

Prior to occupation, the approved plant shall be provided with acoustic isolation, sound attenuation and anti-vibration measures in accordance with the scheme

approved in writing by the local planning authority. All such measures shall thereafter be retained and maintained in accordance with the manufacturers' recommendations.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy G1, A1, A4, D1 and CC1 of the London Borough of Camden Local Plan 2017.

13 Plant and equipment - noise compliance

Noise levels at a point 1 metre external to sensitive facades shall be at least 10dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant / equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 15dB(A) below the LA90, expressed in dB(A).

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.

14 Cycle parking

The cycle storage space as shown on the plans hereby approved shall provide 153 CPG Transport (2021) compliant long stay cycle parking spaces at the site. The facilities shall be provided in their entirety prior to first occupation of the relevant part of the development, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

15 Bird and bat boxes

Prior to first occupation of the development a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.

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

16 Living roof details

Prior to commencement of the relevant part of the development full details of the biodiverse, substrate-based extensive 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 be informed by the Ecological Appraisal and should reflect the local conditions and species of interest. The details shall include:

- detailed maintenance plan;
- details of its construction and the materials used;
- 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; - 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.

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 pumps

Prior to commencement of the relevant part of the development, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the buildings, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include a commitment to monitor performance of the system post construction. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by 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 Diversion of waste from landfill

The demolition works hereby approved shall divert 95% of 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.

19 Waste storage

The ground floor refuse and recycling store shall be provided prior to the first occupation of the building and permanently retained thereafter.

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

20 Fire Safety

The development shall be carried out in accordance with the provisions of the Planning Fire Statement prepared by Marshall Fire dated 14/04/2025 unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12.

21 SUDs

The sustainable drainage system as approved shall be installed as part of the development to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water and to achieve a run off rate of 31l/s.

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.

23 Flue commissioning

Within three months of full occupation of the development, evidence shall be submitted to the Local Planning Authority demonstrating quantitative odour and air quality monitoring on the laboratory flues. The emissions test report should be accompanied by an interpretation report to identify the likelihood of exceeding any odour/air quality thresholds/guidelines.

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.

24 Air Quality and Odour Management Plan

Prior to occupation of the development, the applicant shall submit an Air Quality & Odour Management Plan that shall contain a package of measures designed to mitigate any material impact on the development from the building operations, as follows:

- a) Management regime regarding lab operations in connection with air quality and odour;
- b) Details of other legislation and overseeing bodies in relation to air quality and odour;
- c) Contact details of the operator should local stakeholders seek to raise any issues of concern.

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.

25 Diesel backup generators

Prior to occupation 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 or publicly accessible spaces and are at least 1m (and preferably 3m) above roof level and is the tallest point in a surrounding 20m radius. 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.

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 Policies.

26 Whole Life Carbon

You must apply to us for approval of an updated version of the Whole Life Carbon Assessment within three months of the date of the S73 notice.

Where the updated assessment identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 950kgCO₂e/m² and/or Whole Life Carbon (A-C ex B6&B7 in sequestration) above 1400kgCO₂e/m², which are the benchmarks which most closely match this type of application, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised. You must then carry out works, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

Reason: To ensure the development minimises carbon emissions throughout its whole life cycle and optimises resource efficiency in accordance with Policy SI2 in the London Plan 2021 and Policy CC1 of the Camden Local Plan.

22.0 INFORMATIVES

1	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
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	<p>licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
2	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
3	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
4	<p>Biodiversity Net Gain (BNG) Informative (1/3):</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:</p> <ul style="list-style-type: none"> (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan. <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this will not require the approval of a BGP before development is begun because the planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.</p>

5	<p>Biodiversity Net Gain (BNG) Informative (2/3):+</p> <p>Summary of transitional arrangements and exemptions for biodiversity gain condition</p> <p>The following are provided for information and may not apply to this permission:</p> <ol style="list-style-type: none"> 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024. 4. The permission is exempt because of one or more of the reasons below: <ul style="list-style-type: none"> - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024. - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
6	<p>Biodiversity Net Gain (BNG) Informative (3/3):</p> <p>+ Irreplaceable habitat:</p> <p>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p> <p>+ The effect of section 73(2D) of the Town & Country Planning Act 1990</p> <p>If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p>

+ 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 1 – RSK Air Quality Assessment report 6th October 2025

6th October 2025

Our ref: T445796-03

Camden Council

Sent by email to: [REDACTED]



18 Frogmore Road
Hemel Hempstead
Hertfordshire
HP3 9RT
UK

Telephone: +44 (0)161 236 2757
www.rsk.co.uk

Dear Neil,

1. Introduction

RSK Environment Ltd (RSK) has been commissioned to undertake a review of an air quality and odour assessment associated with an application for the proposed redevelopment of 105 - 121 Judd Street, in the London Borough of Camden. The redevelopment will provide a 6-storey (with an additional 7th storey for roof plant) "laboratory enabled" office development.

The development will include a number of fume cupboards, which are proposed to discharge emissions from the associated extract system via two rooftop stacks. These extract stacks and backup diesel generator emissions are the primary sources of potential pollutant and odour emissions considered within the assessment, and the only sources considered within this review.

Previous air quality and odour assessments were completed in January 2024 and December 2024, respectively. However, following a previous RSK review, it was noted that the details of specific solvent emissions from the laboratory were not detailed in the air quality or odour assessment report; therefore, it was recommended that further information on the pollutants likely to be released from the laboratory be obtained.

Following a resubmission of the air quality and odour assessment, RSK has been requested by the London Borough of Camden Council to review and provide our opinion on the validity of the latest report, named:

- 105-121 Judd Street Air Quality and Odour Assessment Report prepared by Tetra Tech (Ref: 784-B050553; Dated: 19th September 2025).

2. Review of Air Quality and Odour Assessment

Assessment Summary

The submitted assessment has considered the air quality and odour impacts on nearby human receptors from the chemicals used within the proposed fume cupboards, which are discharged via two rooftop stacks (three stacks are proposed, but only two will be used simultaneously). They have also considered the air quality and odour impacts of the emissions associated with a proposed backup diesel generator.

Overall, the air quality and odour assessment (Ref: 784-B050553) has been undertaken using a methodology that is in line with sector best practice guidance (from the Institute of Air Quality Management (IAQM) and the Environment Agency, etc.) using appropriate published air quality standards and odour benchmark criteria.

Additionally, the choice of modelling and dispersion parameters (emission rates and efflux parameters, etc.), the use of 5 years of meteorological data, the appropriate selection of modelling receptors, incorporation of terrain and building effects and the selection of a dispersion model typically used within the UK for regulatory purposes, are judged to be suitable.

The assessment has used the Environment Agency environmental assessment levels (EALs) for Dichloromethane, Methanol, Acetone and Acetonitrile, and the Workplace Exposure Limits (WELs) have been used for Ethyl Acetate to derive bespoke EALs. This is considered an acceptable approach to assess the impact of pollutants not covered by national air quality regulations.

Furthermore, the consultant has conducted modelling sensitivities, in particular with regard to the emissions rates chosen, to seek to address any uncertainty associated with the assessment.

While the assessment has generally been undertaken in line with best practice, there are a number of issues with the assessment that have been highlighted in the following section, below. These issues have been categorised as:

- High Risk – Likely to affect the conclusions of the assessment;
- Medium Risk – May affect the conclusions of the assessment, with clarifications or further assessment required; and
- Low Risk - Unlikely to affect the conclusions of the assessment.

No high risk issues have been identified with the assessment; however, a number of medium and low risk issues have been identified. These require further information/consideration to validate the conclusions of the assessment.

Odour Emissions Estimate Uncertainty – Medium Risk

A quantitative odour assessment of the laboratories flue emissions has been undertaken using the dispersion modelling software AERMOD. This assessment has been undertaken using two sets of emissions rates calculated for the air quality assessment (normal and higher emissions sensitivity test scenarios). In addition, the Consultant has predicted the 98th percentile of hourly averages and compared them against the 1.5 ou_E/m³ benchmark for “most offensive” odours contained within the IAQM’s guidance on the assessment for planning guidance. This benchmark can be considered to be precautionary.

However, the Consultant has not provided enough information for RSK to verify the odour emission rates used in the model. Using the method stated by the consultant (*“odour emission rates for each of the 5 solvents will be derived from (1) the solvent emissions rate (g/s), and (2) the associated odour detection thresholds of individual solvents”*) and the information provided, RSK cannot recreate the emission rates provided.

Based on the information provided, RSK’s estimate of the odour emission rates is similar, and the differences are not likely to affect the conclusions of the assessment (given the magnitudes of the model predictions). However, as a key component of the model, they still require verification.

In addition, there will be added uncertainty with the estimation of odour emission rates resulting from a mixture of chemicals, because the human response to a mixture of compounds may be affected by the specific mixture of chemicals in the emissions and by any interactions between them. The current assessment concludes that the in-stack odour

concentration would be below the limit of odour detection for an average member of the population (normal emissions scenario only), and therefore, that the exhaust stream will essentially be odour-free. This finding is encouraging, but with the caveat that it excludes any uncertainty about possible interactions between chemicals/compounds.

Backup Generator Assessment – Medium Risk

The assessment includes both an air quality and odour assessment of the proposed 300kVA back-up (emergency) generator, which is proposed to be installed in case of the loss of power to the building. The assessment indicates that the generators will be used for approximately 1 hour per month for maintenance and testing purposes.

Focusing on the short-term impacts of the backup generator, which are normally the greatest concern, the Consultant's assessment has been qualitative in nature and focuses on NO₂ emissions during routine testing only. The assessment relying on the argument that 12 hours of proposed operation is lower than the 18 permissible hourly exceedances of the 1-hour NO₂ objective concentration (200 µg/m³) to conclude that exceedances of the objective is unlikely.

While it is not likely that the operation of the single diesel generation will give rise to significant air quality impacts during routine testing, this has not been demonstrated by the Consultant's air quality assessment. It is plausible that other sources of primary NO₂ in the area could be causing exceedances of the 1-hour NO₂ objective concentration (200 µg/m³), reducing the number of allowable exceedances for the proposed generator.

As it is not 100% clear within the report that the generator stack extends beyond the height of the nearest building downwind of the development, any additional primary NO₂ may be of significance, and the impacts require further justification.

Ecological Assessment - Low Risk

In relation to ecological receptors, the air quality report states:

“Air quality impacts associated with the proposed re-development have the potential to impact on receptors of ecological sensitivity within the vicinity of the site”

The assessment then goes on to list a number of local habitat sites within 2 km of the development. However, there is no assessment of the development impacts on ecological receptors. As the applicant's consultant states there is the potential for impacts on ecologically sensitive sites, they should provide justification for not including an assessment.

Estimation of Pollutant Emission Rates - Low Risk

The estimation of emission rates has been undertaken assuming the monthly chemical usage is split evenly throughout each hour of the year. Furthermore, they have assumed that only 1% of the monthly usage of chemicals was released into the exhaust stream, which the consultant has considered to be a conservative estimate.

The above is understood to be based on a month-long period of measurement at LifeArc's existing laboratory facility.

While RSK does not agree that the above method for deriving emission rates is conservative, the use of average emission rates taken across a monthly period is not protective of the Environmental Assessment Levels, which represent the 100th percentile. As the emission rates have been based on data collected from a proxy facility, and a sensitivity test has been undertaken for the release assuming that one-month total chemical usage is released across

an 8-hour period, the assessment in terms of pollutant emission rate selection is judged to be suitable.

Baseline Assessment - Low Risk

The baseline assessment is not likely to be representative of conditions in the area. While there are no UK monitoring networks that record concentrations of dichloromethane, methanol, acetone, acetonitrile or ethyl acetate, the NO₂ baseline assessment has not considered the most up to date information. As monitoring data produced by Camden Council is available up until 2024, and ground level concentrations are predicted by the London Atmospheric Emissions Inventory (LAEI) at a resolution of 20m x 20m across the study area, the use of 1 km x 1 km Defra background maps and 2021 monitoring by Camden Council to derive the baseline is not judged to be appropriate.

While the baseline concentrations have not been directly used within any calculations in the assessment, any qualitative assessment that relies on the background concentrations data may not be appropriate.

Overall Review Conclusions and Recommendations

Air Quality Assessment

The assessment of pollutant concentrations from the fume cupboard stack has been undertaken using an appropriate guidance and methodology that would be expected. Furthermore, sensitivity to higher than anticipated emission rates has been undertaken, along with a series of other sensitivity tests. While a number of minor issues have been found with the fume cupboard stack pollutant concentration assessment, no issues have been found that are likely to invalidate the conclusions.

Furthermore, a backup diesel generator impact assessment has been undertaken, with the assessment concluding no significant effects; however, it is judged that the assessment has not fully demonstrated this. While it is not likely that the routine testing of the generator will cause significant effects, confirmation that the height of the stacks is above the nearby buildings, or further justification relating to the short-term impacts with regard to other nearby NO₂ emitters, is required.

Odour Assessment

The assessment of odour emissions from the fume cupboard stack has been undertaken using appropriate guidance and a methodology that could be expected. However, there is some uncertainty with the estimation of odour emission rates resulting from any "odour" interactions between the mixture of chemicals in the emissions, i.e., the human response to the odour in emissions may be affected by the specific mixture of chemicals and any interactions between them. Furthermore, the Consultant has not provided enough information for RSK to verify the odour emission rates used in the model.

As sensitivity testing to higher than anticipated emission rates has been undertaken, and as impacts are still well below published odour benchmarks, with the in-stack exhaust stream being concluded to be essentially odour-free (excluding the above uncertainty), the risk of significant impacts appears to be low.

However, given the above uncertainties, the complex dispersion environment around the proposed development and the number of nearby receptors, it is recommended that a

Planning Condition be used to verify an odour-free stack emission using in-stack odour sampling following commencement of the operation. Such a condition could be used to ensure that appropriate measures are in place for odour impact control, with it highly likely that suitable mitigation could be retrospectively installed if the measured operational odour emission rates are found to be higher than anticipated.

Furthermore, it is recommended that an Odour Management Plan should be created to manage any significant changes in the composition and quantities of solvents used.

We hope you will find our review and observations helpful. However, should you have any queries or wish to discuss any matters, please do not hesitate to contact us.

Yours sincerely,

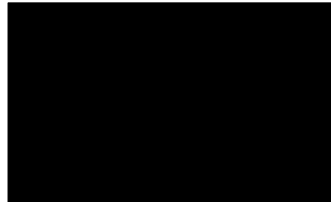
For RSK Environment Limited

Prepared by:



Dr Aastha Dhingra
Senior Air Quality Consultant

Reviewed by:



Adam Dawson
Principal Air Quality Consultant

Planning Committee

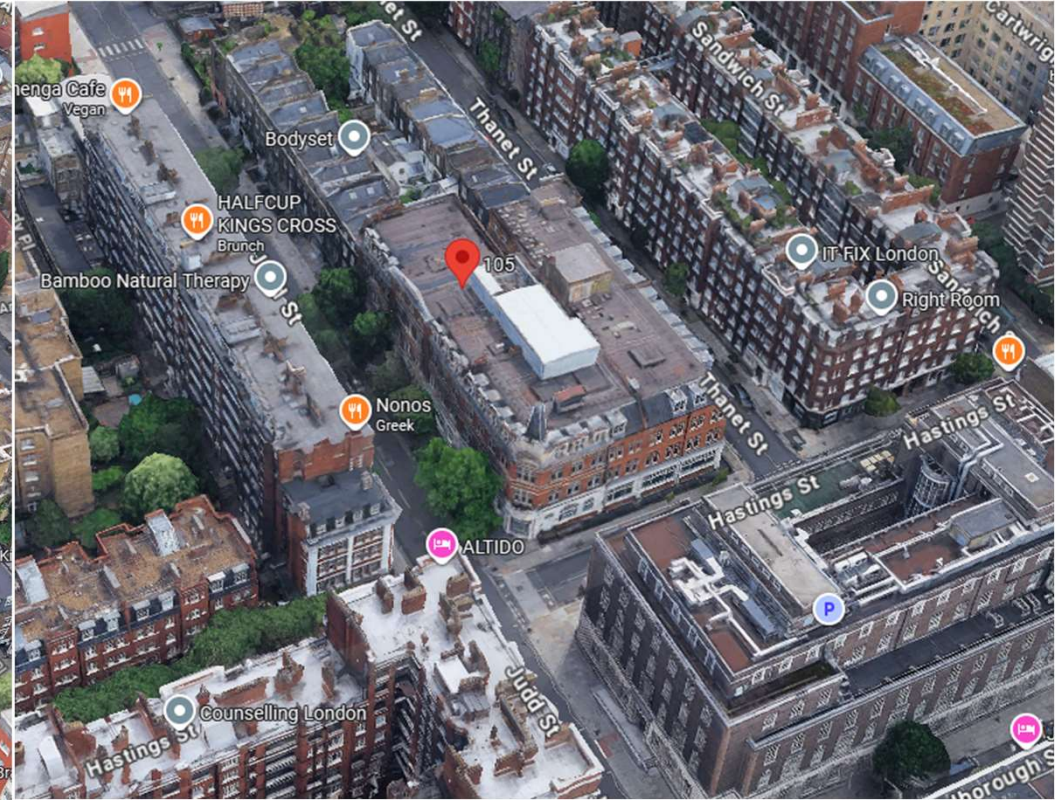
13th November 2025

2025/1684/P

105 - 121 Judd Street
London
WC1H 9NE







JN1
JN2



Slide 6

JN1 John Nicholls, 04/11/2025

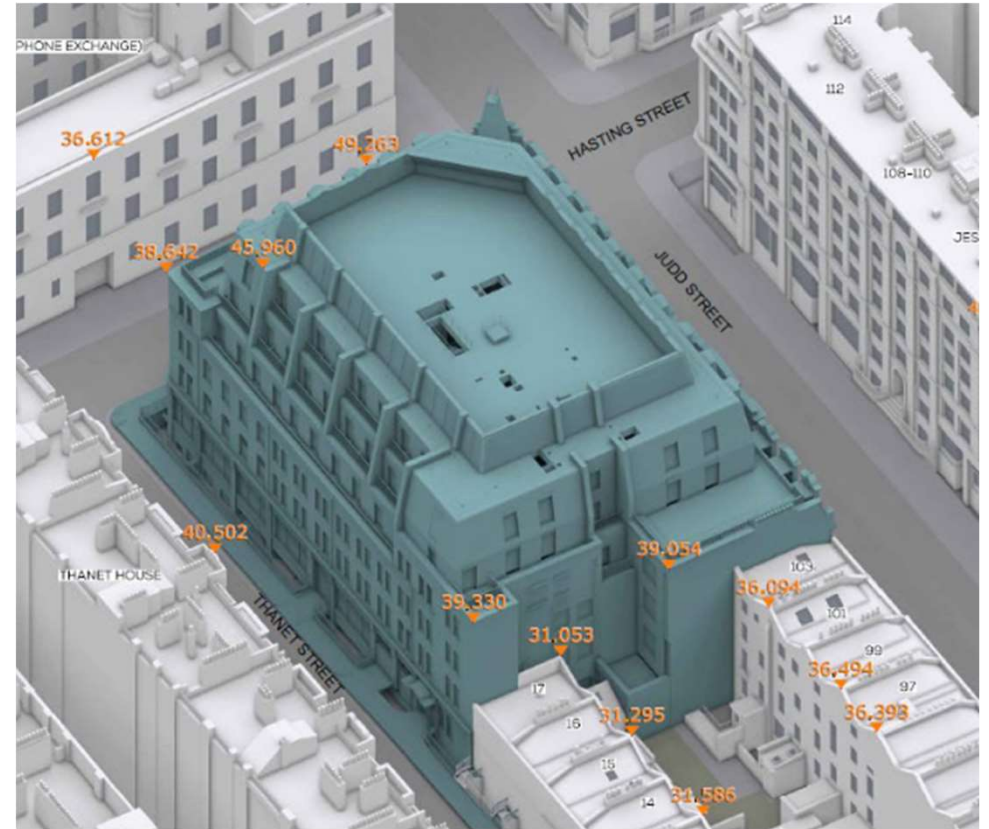
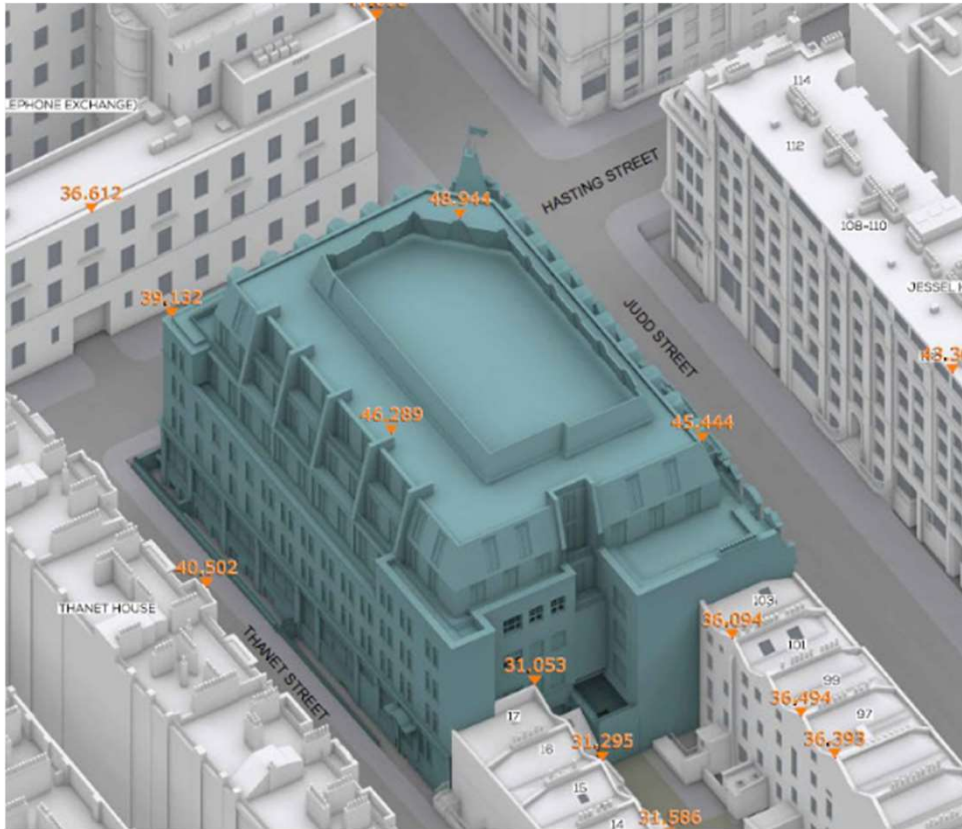
JN2 John Nicholls, 04/11/2025









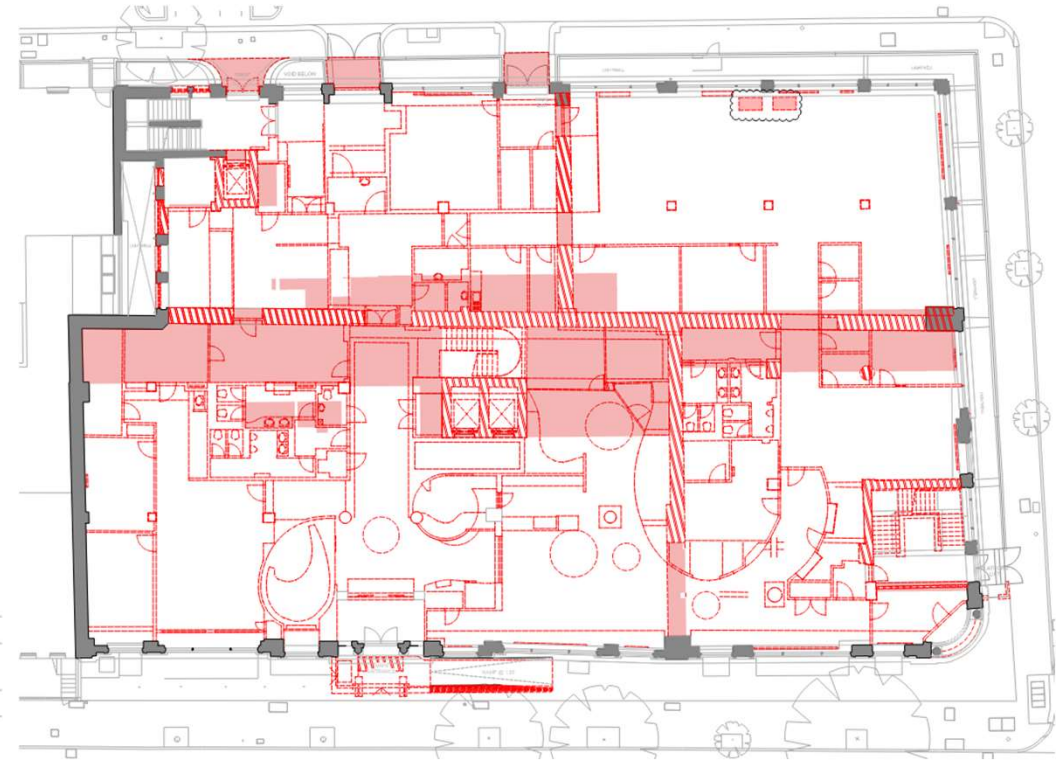
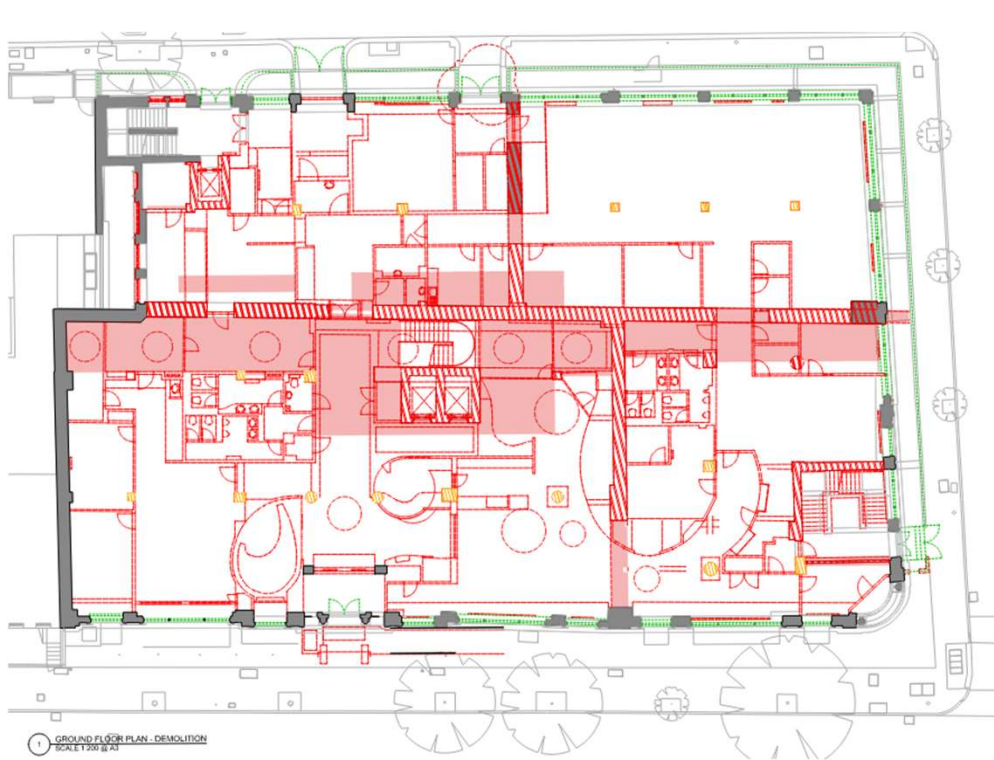




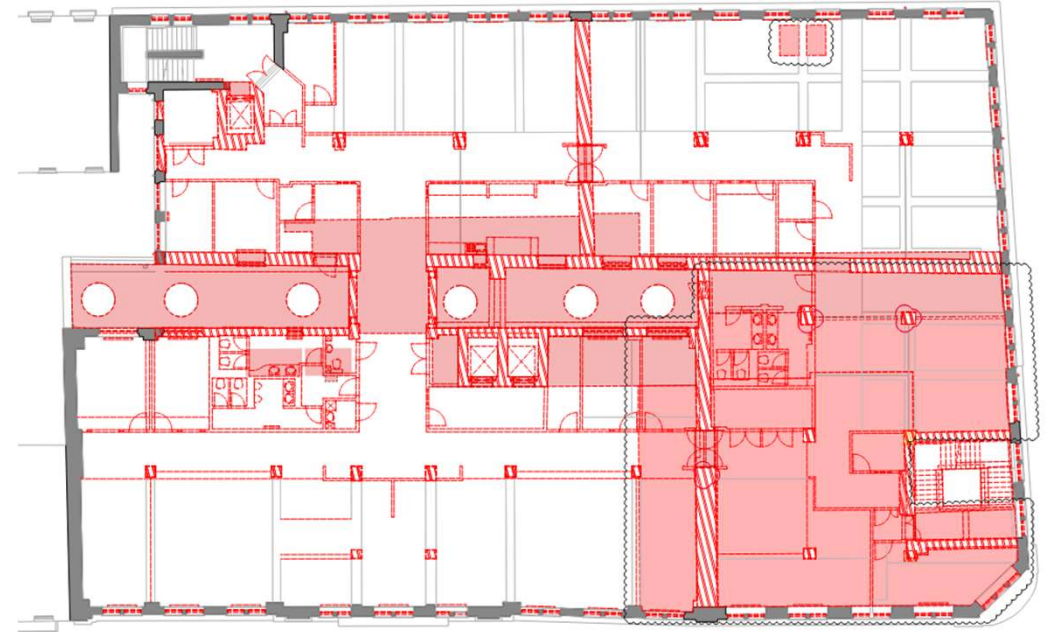
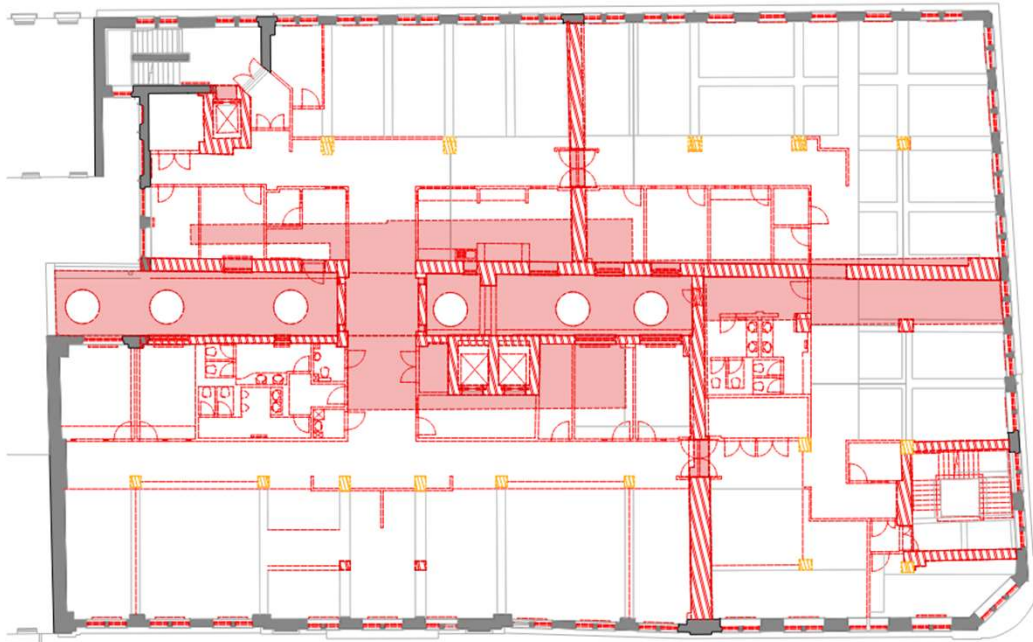




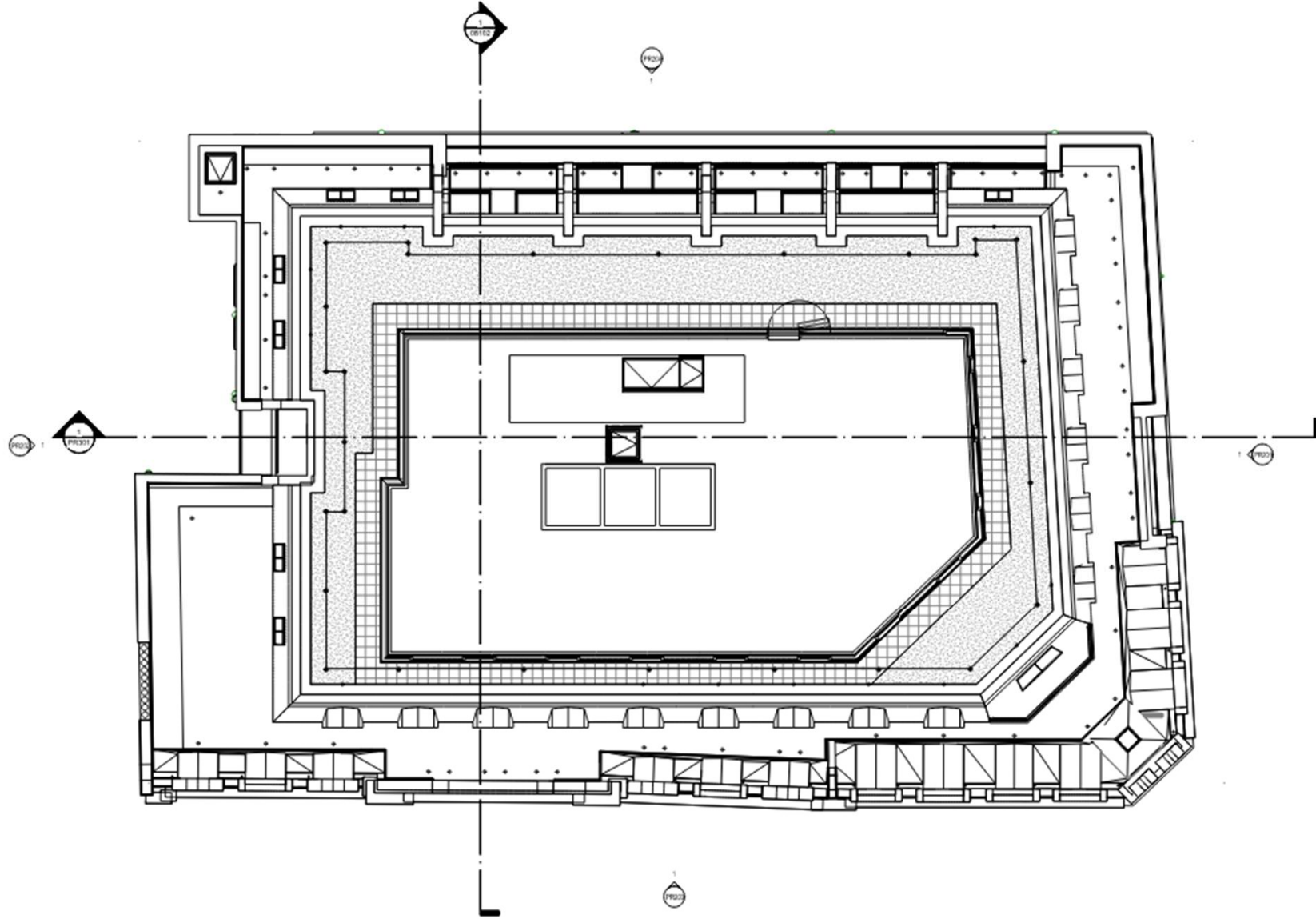


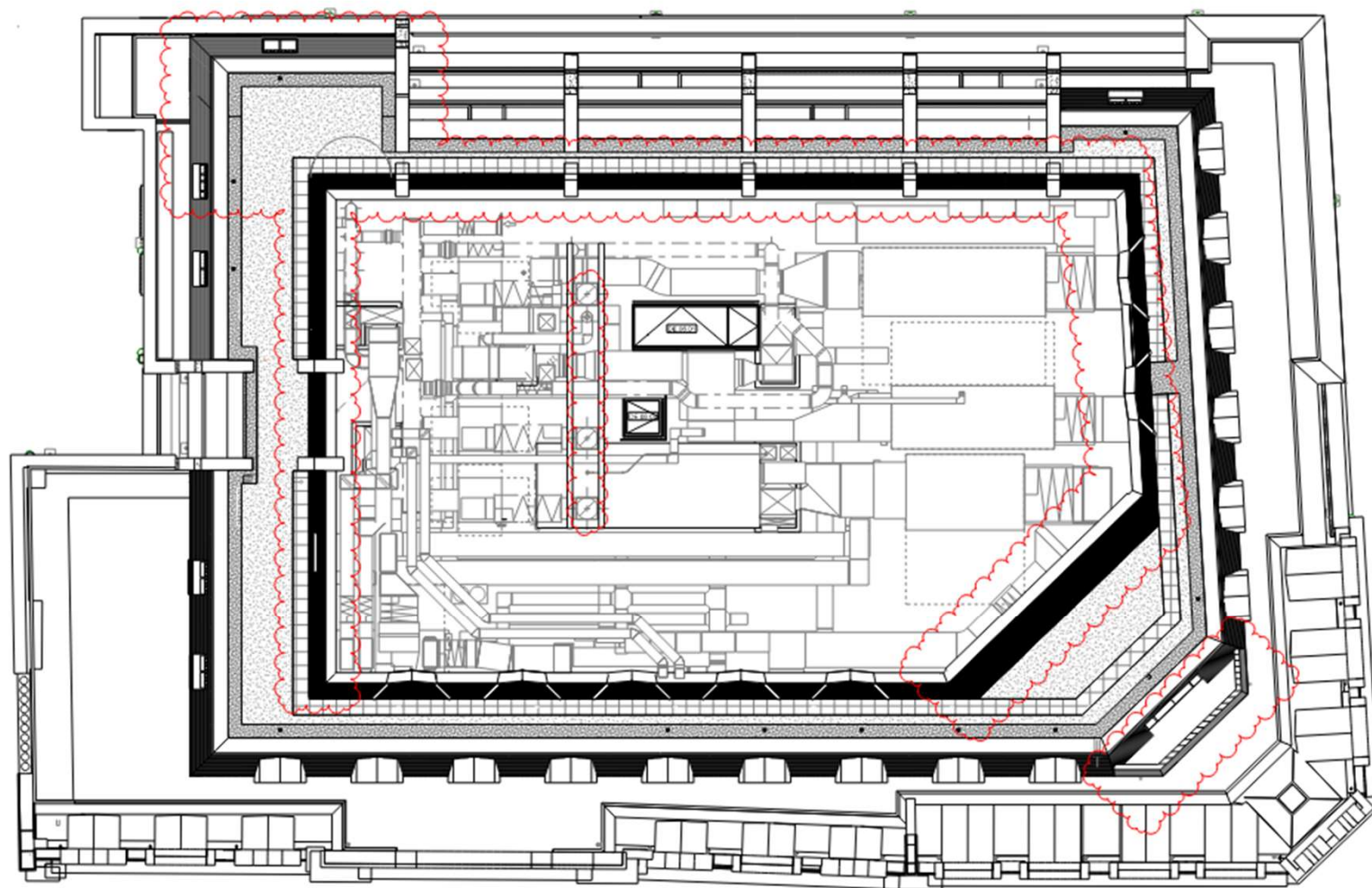


-  Demolition - Structural
-  Demolition - Soft
-  Partial Demolition



-  Demolition - Structural
-  Demolition - Soft
-  Partial Demolition



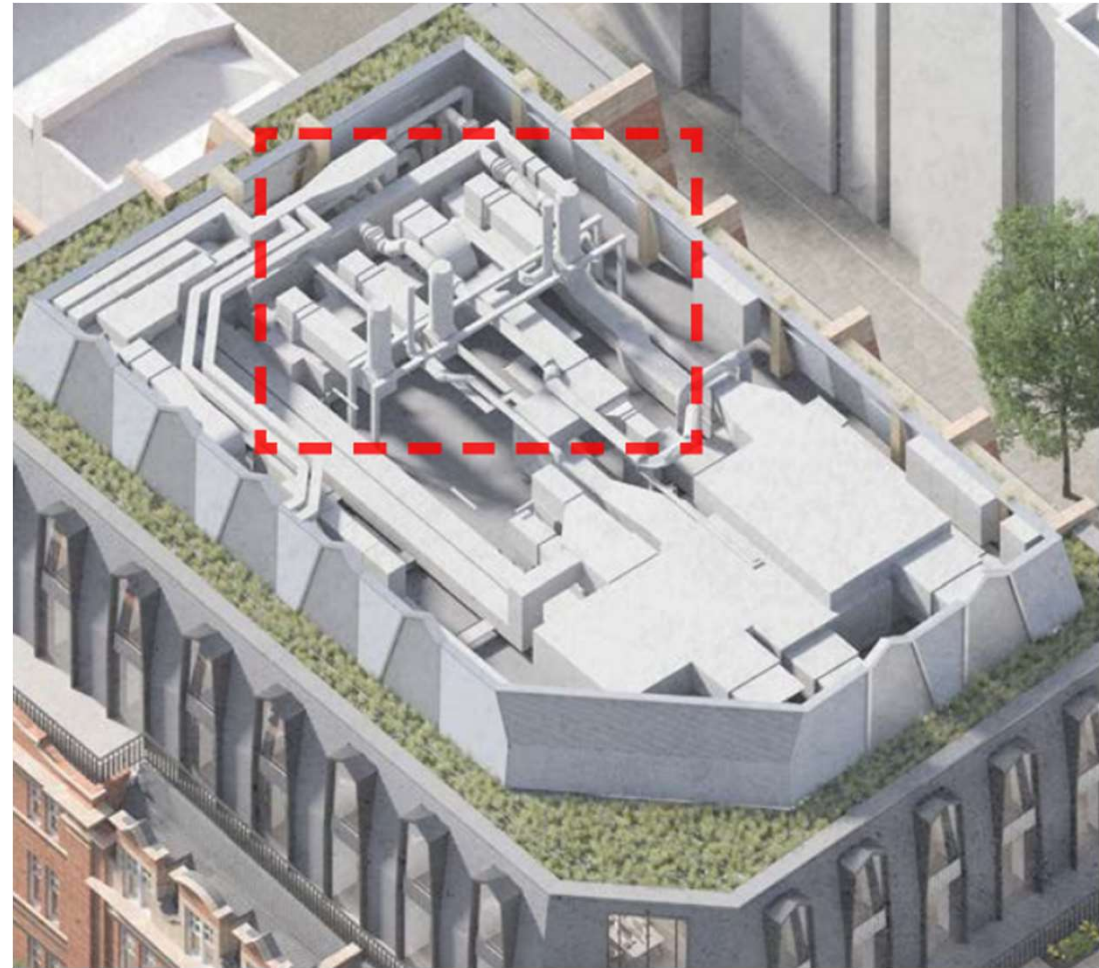


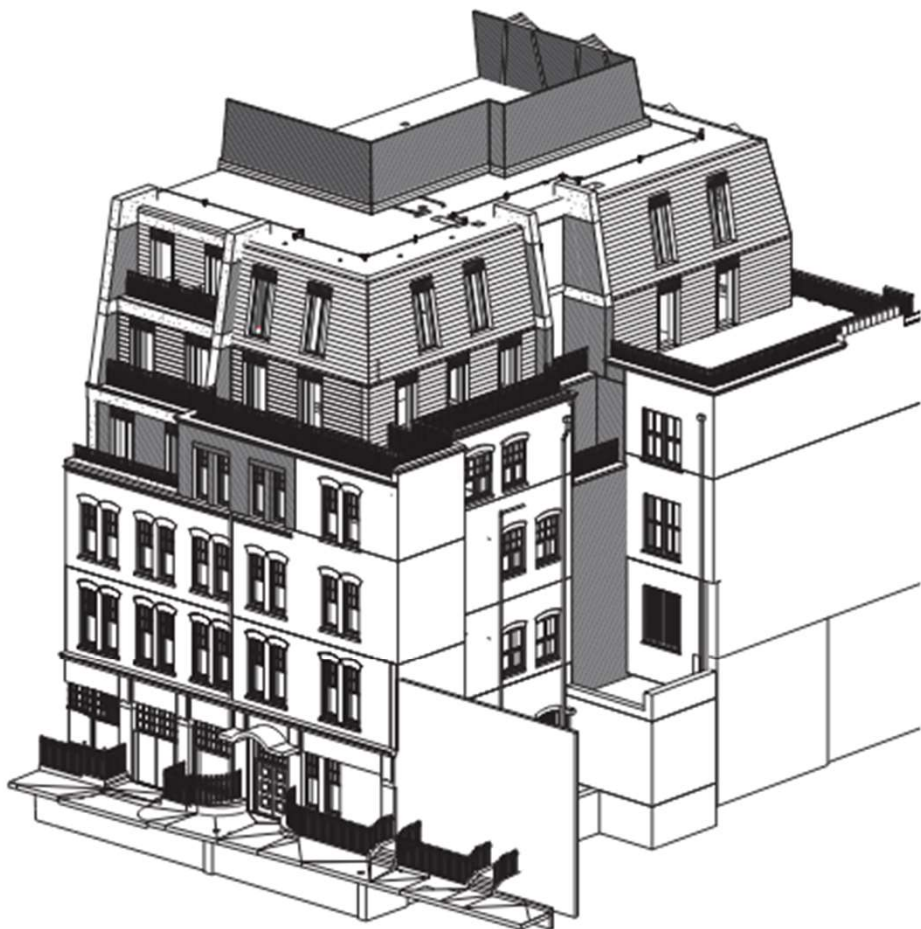


Estimated view from top floor Jessel House

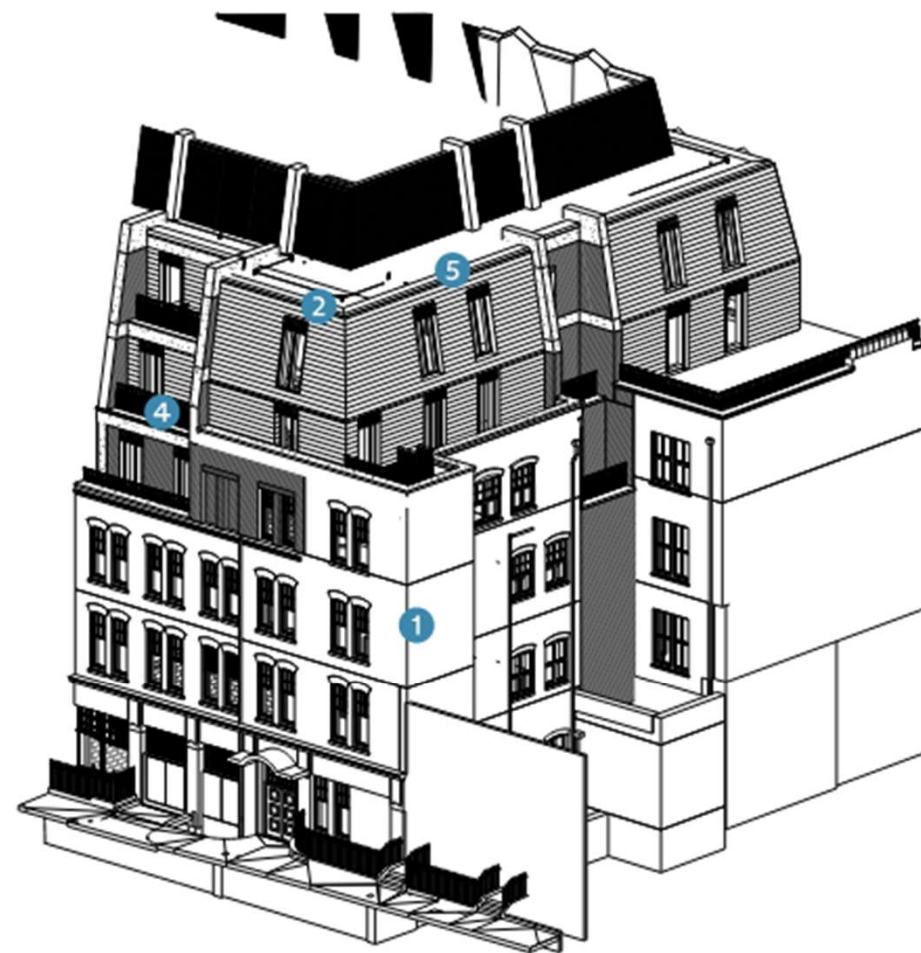


Estimated view from top floor Thanet House House





Permitted Southwest Corner - Massing Study



Proposed Southwest Corner - Massing Study

