Address:	69-70 & 71 Warren Street & 301-305 Euston Road London NW1 3AD		
Application Number:	2025/2958/P	Officer: Edward Hodgson	2
Ward:	Bloomsbury		
Date Received:	03/07/2025		
Proposal:	Refurbishment, alterations and upward extension of 69-70 Warren Street and 301-305 Euston Road to provide additional commercial accommodation (Class E), together with the refurbishment and upward extension of 71 Warren Street to retain the use of the property as a single dwelling (Class C3) and associated work.		

Background Papers, Supporting Documents and Drawing Numbers:

Existing Drawings:

EWS-FLA -ZZ -00 -DR -A-05-001, EWS-FLA -ZZ -00 -DR -A-05-002, EWS-FLA -ZZ -ZZ -DR -A-05-020, EWS-FLA -ZZ -ZZ -DR -A-05-021, EWS-FLA -ZZ -ZZ -DR -A-05-030, EWS-FLA -ZZ -ZZ -DR -A-05-031, EWS-FLA -ZZ -00 -DR -A-05-010, EWS-FLA -ZZ -01 -DR -A-05-011, EWS-FLA -ZZ -02 -DR -A-05-012, EWS-FLA -ZZ -03 -DR -A-05-013, EWS-FLA -ZZ -B1 -DR -A-05-009, EWS-FLA -ZZ -RF -DR -A-05-014

Demolition Drawings:

EWS-FLA -ZZ -00 -DR -A-05-050, EWS-FLA -ZZ -01 -DR -A-05-051, EWS-FLA -ZZ -02 -DR -A-05-052, EWS-FLA -ZZ -03 -DR -A-05-053, EWS-FLA -ZZ -B1 -DR -A-05-049, EWS-FLA -ZZ -RF -DR -A-05-054

Proposed Drawings:

EWS-FLA -ZZ -ZZ -DR -A-05-200, EWS-FLA -ZZ -ZZ -DR -A-05-201, EWS-FLA -ZZ -ZZ -DR -A-05-202, EWS-FLA -ZZ -ZZ -DR -A-05-203, EWS-FLA -ZZ -ZZ -DR -A-05-300, EWS-FLA -ZZ -ZZ -DR -A-05-301, EWS-FLA -ZZ -ZZ -DR -A-05-302, EWS-FLA -ZZ -ZZ -DR -A-05-303, EWS-FLA -ZZ -ZZ -DR -A-05-400, EWS-FLA -ZZ -ZZ -DR -A-05-401, EWS-FLA -ZZ -00 -DR -A-05-060, EWS-FLA -ZZ -00 -DR -A-05-100, EWS-FLA -ZZ -01 -DR -A-05-101, EWS-FLA -ZZ -02 -DR -A-05-102, EWS-FLA -ZZ -03 -DR -A-05-103, EWS-FLA -ZZ -04 -DR -A-05-104, EWS-FLA -ZZ -05 -DR -A-05-105, EWS-FLA -ZZ -06 -DR -A-05-106, EWS-FLA -ZZ -07 -DR -A-05-107, EWS-FLA -ZZ -B1 -DR -A-05-099, EWS-FLA -ZZ -RF -DR -A-05-108

Documents:

Cover Letter (Iceni), Daylight/Sunlight (Impact on neighbouring occupiers – GIA 26/06/25), Daylight/Sunlight (Internal – GIA 25/06/2025), Delivery Servicing Plan (TTP July 2025), Energy Statement (CPW 01/07/2025), London Plan Fire Statement (Jensen Hughes 03/06/25), Flood Risk Assessment (Robert Bird Group 15/10/25 rev P06), Planning Statement (Iceni July 2025), Statement of Community Engagement (Iceni July 2025), Sustainability Statement (CPW 24/09/2025 P05), Transport Statement (TTP July 2025),

Workplace Travel Plan (TTP July 2025), Noise Report (Sandy Brown 17/10/2023), Air Quality Assessment (Logika 22/09/25 rev 04), Basement Impact Assessment (Robert Bird Group 19/09/2025 rev P04), BNG Exemption Letter (Greengage 04/06/25), Design and Access Statement (Flanagan Lawrence July 2025), BREEAM V6 New Construction (Office) Pre-Assessment Report (CPW 26/06/25), BREEAM 2014 Refurbishment & Fit Out (Office) Pre-Assessment Report (CPW 26/06/25), Draft Construction Management Plan, London View Management Framework Vista from Parliament Hill: Desktop Assessment (Flanagan Lawrence July 2025)

RECOMMENDATION SUMMARY:

Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:	Agent:
Warren Street Commercial Ltd and Warren Street Residential Ltd 1 Hand Axe Yard 277a Gray's Inn Road London WC1X 8BD	Iceni Projects 44 Saffron Hill London EC1N 8FH

ANALYSIS INFORMATION

Land use f	Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)	
Class E	Retail and Office	1,550	2,313	+ 763	
C3	Dwellinghouse	196	293	+ 97	
Total	All uses	1,746	2,606	860	

Existing and proposed homes			
Tenure	Existing homes	Proposed homes	Difference in homes
Market homes	1	1	0
Affordable homes	0	0	0
Tenure	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Market homes	196	293	+97
Affordable homes	0	0	0

Parking details				
Туре	Existing spaces	Proposed long stay	Proposed short stay	Difference
Car parking	0	0	0	0
Cycle parking (residential)	0	2	0	+2
Cycle parking (non-residential)	0	31	5	+ 36

EXECUTIVE SUMMARY

- i) The proposal involves the retention, refurbishment and upwards extension of the existing office building facing onto both Euston Road and Warren Street (69-71 Warren Steet & 301-305 Euston Road), and the addition of a roof extension with dormer windows to the existing residential house facing onto Warren Street (no. 71 Warren Street). The commercial building would be extended upwards with three additional set back storeys of commercial space and a terrace and plant enclosure above. Both street facing elevations would be altered with new façades. Retail space is proposed at ground floor to create an active frontage on both streets with office space at upper levels. The existing basement would be partially extended and lowered. The proposal would bring back the currently vacant Georgian townhouse by extending by a single storey at roof level and removing the non-original garage at ground floor, with the installation of a more traditional entrance and windows.
- ii) The development would provide additional commercial space within the Central London Area and Knowledge Quarter and would add retail space at ground floor thus contributing to the local economy of Warren Street, Euston Road and the wider Fitzrovia area. The building would be substantially retained, with approx. 70% of the floor structure in the commercial building to be retained and the building would achieve BREEAM Excellent. The existing house would be brought back into use, and a full payment-in-lieu for housing will be secured to address the Council's mixed-use policy, which is accepted because of the constraints of housing delivery on site. The design would improve and revitalise an unused and incongruous office building, helping it to tie in better with the streetscene and be a catalyst for positive change on both Euston Road and Warren Street.
- iii) Although additional housing would not be provided on-site, a payment-in-lieu is secured via a section 106 legal agreement for affordable housing. Less-than-substantial harm to the Fitzroy Square Conservation Area and the setting of the Grade II listed terrace 63-68 Warren Street has been identified by virtue of the increased height and massing on the Warren Street side. In line with para 212 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The proposal has sought to minimis the harm through a setback and raked roof form, which reduces the bulk, and a façade design on Warren Street which is more sympathetic to the surrounding context.

- iv) The public benefits of the scheme, including economic development through additional office and retail space, and the financial contributions towards housing, transport infrastructure and employment opportunities would mean that the less-than-substantial harm identified above would be outweighed. The scheme would also help to revitalise a part of the borough that currently feels hostile and unattractive, especially on the Euston Road side, and it is hoped that it would pave the way for further investment and development in this area through upgrading and modernising a dated and tired office building. This would be a major benefit of the scheme.
- v) The scheme complies with the development plan as a whole and is recommended for approval.

OFFICER REPORT

Reason for Referral to Committee: Minor development where this involves the construction of either 5 or more five single dwelling houses or upwards of 500 sq. mtrs of non-residential floorspace (Clause 3(ii)).

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Neighbourhood Area	Fitzrovia East
Area Action Plan	Fitzrovia
PTAL (Public transport accessibility)	6b
Underground development constraints and considerations	- Subterranean (underground) flow - Slope stability - TfL Underground Zone of Influence
Listed Buildings	63-68 Warren Street (adjacent to site)
Conservation Area	Fitzroy Square (adjacent to site)
London View Management Framework	2A.2 Parliament Hill summit to Palace of Westminster
Central London Area	Central London Area

Table 1 - Site designations and constraints

Description

1.2 The site consists of a four-storey office 1960s office building finished in white render which faces onto both Euston Road and Warren Street, and a period residential property constructed of London stock brick with white stucco at ground floor consisting of four storeys facing onto Warren Street with a lightwell to the rear. The site is located in close proximity to Warren Steet Underground Station and close to the junction between Euston Road and Tottenham Court Road. The commercial building effectively wraps around the residential building in an L-shaped manner.

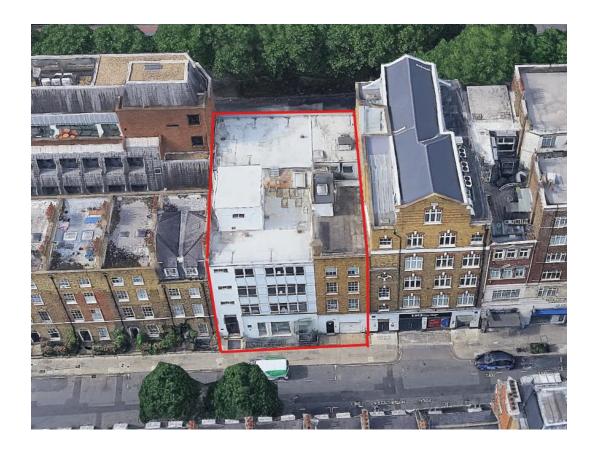


Figure 1 – The existing site outlined in red shown aerially from the south with Warren Street in the foreground

- 1.3 The site consists of an office building (Class E) and a single family dwellinghouse (Class C3).
- 1.4 The site is bounded by Warren Street to the south and Euston Road to the north. On the Warren Street side, the surrounding properties are largely four storeys to the west, and to the east, the height increases up to six storeys on the corner with Tottenham Court Road. The street has a mix of residential and commercial uses, and it is common for the buildings to have a mix of uses within them (for example retail at ground floor and residential above). On the Euston Road side, the surrounding buildings are slightly taller, with part-five part-six storey buildings either side of the application site. The uses are more commercial in nature with less residential. On the opposite side of Euston Road is Euston Tower and Regents Place commercial area. Whereas the Warren Street side has a quieter and more historic feel, the Euston Road side feels busier and more hostile in nature.
- 1.5 The site is located within the Central London Area, and within the Fitzrovia Area Action Plan. The Fitzroy Square Conservation Area sits immediately to the west and south of the site. The western portion of the site just sits within view 2A.2 of the London View Management Framework (Parliament Hill summit to the Palace of Westminster). The buildings immediately to the west

of the site on Warren Street are Grade II listed (Nos.63-68 (Consecutive) and attached railings).

The site has a Public Transport Accessibility Level (PTAL) rating of 6b (Excellent) and is close to Warren Street and Euston Road Underground Stations, as well as bus services 453, 88, 24, 134, 390, 30, 73, 29, 18 and 205.

2. THE PROPOSAL

- 2.1 On the commercial building (69-70 Warren Street and 301-305 Euston Road), the proposal is for a three-storey upwards extension with a roof terrace and plant enclosure on the Euston Road side (giving the appearance of a four-storey extension on this side and a three-storey extension on Warren Street), new facades on both street elevations, and an enlarged and lowered basement. The additional storeys would be set back, with a stepped form. This would provide additional office space, and a retail offering is proposed at ground floor that would help create active frontages onto both street elevations, especially when compared to the existing condition, PV panels and planting are proposed on the roof terrace. The existing facades and 30% of the floor structure would be demolished.
- 2.2 On the residential property (71 Warren Street), a roof extension with two front dormers is proposed as well as alterations to the ground floor front elevation (namely to remove the non-original garage door and install windows and a new door). This building would be brought back into use having been vacant for many years and would be used as a single family dwellinghouse as was previously the case.

3. RELEVANT HISTORY

The site

3.1

2006/0639/P - Change of use from residential (Class C3) to offices at part ground, first, second and third floor levels fronting Warren Street, the erection of an additional fourth floor for office use, the erection of an additional fifth floor to provide a 3 bedroom apartment and an external plant area at fifth floor level. Refused – 05/05/2006. (refused for design reasons due to the impact of the roof extension on the Warren Street elevation, and the failure to maximise residential use). Dismissed at appeal 22/11/2006. The inspector was concerned that the roof extension on the commercial building on Warren Street was not set back sufficiently and appeared as bulky next to 63-68 Warren Street and the increase in height of multiple storeys over the residential building no. 71. These concerns have been addressed with a setback and raked roof form and only a single storey extension is proposed over no. 71. The appeal decision is also clear that an appropriately design roof extension on Warren Street in principle is acceptable.

P9603260R1 - Change of use of the ground floor from office use (Class B1) to restaurant use (Class A3), together with alterations to the Euston Road and Warren Street elevations and alterations to the basement entrance area for Warren Street. **Granted – 15/01/1997**

9501595 - Alterations to ground floor elevations to Euston Road and Warren Street frontages. **Granted – 06/09/1995**

8401220 - Change of use and works of conversion to provide:- (i) Offices in the basement and on part of the ground second and third floors. (ii) A Computer Services Unit or a retail shop on part of the ground floor. **Granted** – 10/07/1984

The area

3.2 <u>18-19 Warren Street</u>

2006/0475/P - Part change of use and part redevelopment from mixed office use (Use Class B1), meeting room (Use Class D1) and residential flat (Use Class C3) to accommodate office use at ground and basement floor levels, retained meeting room at ground floor level, and 13 self-contained flats at first to fourth floor levels comprising 6 x 1 bed, 5 x 2 bed and 2 x 3 bed flats, including extensions at third and fourth floor levels. **Granted Subject to a s106 legal agreement - 12/05/2006**

Euston Tower

2023/5240/P - Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and Enterprise Space (Class E/F) at ground and first floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work. **Resolution to Grant subject to a s106 legal agreement - 05/06/2025**

4. CONSULTATION

Statutory consultees

4.1 Transport for London (TfL)

 No objection in principle to the application, however, there are a number of potential constraints on the redevelopment of the site close to London Underground tunnels and infrastructure, in particular, the site is above Warren Street Underground Station.

- It must be demonstrated to London Underground engineers that the proposed development will not have any detrimental effect on the tunnels and structures either long term or short term, the design must be such that the loading imposed on the tunnels or structures is not increased or removed, and TfL offer no right of support to the development or land:
- The grant of planning permission should be subject to a condition securing details which: Identify existing LUL structures which are located in the vicinity of existing building and/or have interface with existing building foundation;

The development must be shown to take no support from LUL land or property or to detrimentally change the loading on them. The applicant has to provide anticipated building load changes on LUL structures for temporary construction stage and permanent long term stage;

Provide a Ground Movement Assessment (GMA) and this should consider the temporary and permanent changes in loading which may affect LUL structures and tunnels;

Details of any proposed boreholes or piles shall be submitted to LUL and their written approval should be obtained. Driven piles will not be permitted in the vicinity of LUL's tunnels or other subsurface structure;

Provide detailed design and Risk Assessment Method Statement (RAMS) for all demolition, temporary and permanent works;

Provide detailed design and Risk Assessment Method Statement (RAMS) on the use of tall plant/cranes/scaffold;

An assessment of railway noise and vibration shall be carried out and appropriate protective measures shall be taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration.

 TfL also raised comments about the cycle parking, Blue Badge car parking, and construction management.

Officer response: Further details of the cycle parking are secured via condition 15. The provision of a disabled parking space is secured via the section 106 legal agreement. A construction management plan, including the requirement to set up a community working group, would be secured via the section 106 legal agreement.

Local groups

Fitzroy Square CAAC

4.2 No comments received

Charlotte Street Association

Objection covering the following issues:

Design and Heritage:

- Additional storeys on the Warren Street side, although stepped back, will increase the scale and bulk, and will be seen when viewed east along Warren Street. The party wall will be a 'cliff face' next to the listed buildings and will dwarf the heritage assets.
- Will have serious detrimental impact on the setting of the immediate listed terrace buildings.
- Additional storeys on Euston Road will be higher than the buildings either side and will have a negative impact on the Fitzrovia skyline, the Fitzroy Square Conservation Area, and the Grade II listed BT Tower.

Officer response: The Council has identified less-than-substantial harm to the nearby Fitzroy Square Conservation Area and the setting of the Grade II listed terrace. Design and Heritage are discussed further in section 9 of the report.

Sustainability:

 Insufficient solar panels is a lost opportunity to increase sustainability of the commercial building.

Officer response: The building would achieve BREEAM excellent rating. Energy and Sustainability are discussed in section 10 of the report. There is only limited available roof space and the maximum available roof space will have PV panels.

Amenity:

 Proposed roof terrace on the commercial building could lead to noise disturbance. Conditions should be attached limiting the hours of use to 8am and 6pm Monday to Friday.

Officer response: Amenity is discussed in section 8 of the report. Conditions limiting the hours of use are proposed and secured under condition 22. The proposed hours are 8am to 8pm Monday to Friday

which given the size of the terraces is considered appropriate in this location.

Housing:

• Disappointing that a policy-complaint amount of housing is not included, and neither is a payment-in-lieu.

Officer response: During the course of the application, the applicant has confirmed that they will make a payment-in-lieu for housing, and this would be secured under a section 106 legal agreement. Housing is discussed further in the land use section 7.

Adjoining occupiers

- 4.3 4 site notices were displayed around the site, two outside the property on both Euston Road and Warren Street, one outside Warren Street Underground Station and another on the corner between Whitfield Street and Warren Street. The notices were displayed on 09/07/2025 until 02/08/2025
- 4.4 4 letters of support were received from and on behalf of local businesses along Warren Street, including from the Fitzrovia Partnership Business Improvement District. The responses received are on the Council's website and support bringing back vacant buildings to use with a retrofit approach, the enhancement of the streetscene from the design and architecture, and the vibrancy the proposal would bring to the area.

5. POLICY

National and regional policy and guidance

National Planning Policy Framework 2024 (NPPF)
National Planning Practice Guidance (NPPG)

London Plan 2021 (LP)

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

SD1 Opportunity Areas

SD4 The Central Activities Zone (CAZ)

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

SD10 Strategic and local regeneration

D1 London's form, character and capacity for growth

D2 Infrastructure requirements for sustainable densities

D3 Optimising site capacity through the design-led approach

D4 Delivering good design

D5	Incl	usive	desi	ian

D8 Public realm

D10 Basement development

D11 Safety, security and resilience to emergency

D12 Fire safety

D14 Noise

E1 Offices

E2 Providing suitable business space

<u>E4 Land for industry, logistics and services to support London's economic function</u>

E8 Sector growth opportunities and clusters

E11 Skills and opportunities for all

HC1 Heritage conservation and growth

HC3 Strategic and Local Views

HC4 London View Management Framework

G1 Green infrastructure

G5 Urban greening

G9 Geodiversity

SI 1 Improving air quality

SI 2 Minimising greenhouse gas emissions

SI 3 Energy infrastructure

SI 4 Managing heat risk

SI 5 Water infrastructure

SI 7 Reducing waste and supporting the circular economy

SI 8 Waste capacity and net waste self-sufficiency

SI 12 Flood risk management

SI 13 Sustainable drainage

T1 Strategic approach to transport

T2 Healthy Streets

T3 Transport capacity, connectivity and safeguarding

T4 Assessing and mitigating transport impacts

T5 Cycling

T6 Car parking

T6.1 Residential parking

T6.2 Office Parking

T6.3 Retail parking

T6.5 Non-residential disabled persons parking

T7 Deliveries, servicing and construction

T9 Funding transport infrastructure through planning

DF1 Delivery of the Plan and Planning Obligations

M1 Monitoring

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

Small Site Design Codes LPG

Housing Design Standards LPG

Public London Charter LPG

Housing SPG

London View Management Framework SPG

London's Foundations SPG

Urban greening factor LPG (February 2023)

Air quality positive LPG

Air quality neutral LPG

Be Seen energy monitoring LPG

Circular economy statements LPG

Energy Planning Guidance

The control of dust and emissions in construction SPG

Whole life carbon LPG

Sustainable Transport, Walking and Cycling

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy 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 H6 Housing choice and mix

Policy H7 Large and small homes

Policy C5 Safety and security

Policy C6 Access for all

Policy E1 Economic development

Policy E2 Employment premises and sites

Policy A1 Managing the impact of development

Policy A3 Biodiversity

Policy A4 Noise and vibration

Policy A5 Basements

Policy D1 Design

Policy D2 Heritage

Policy D3 Shopfronts

Policy CC1 Climate change mitigation

Policy CC2 Adapting to climate change

Policy CC3 Water and flooding

Policy CC4 Air quality

Policy CC5 Waste

Policy T1 Prioritising walking, cycling and public transport

Policy T2 Parking and car-free development

Policy T3 Transport infrastructure

Policy T4 Sustainable movement of goods and materials

Policy DM1 Delivery and monitoring

Fitzrovia Area Action Plan (March 2014)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

Access for All CPG - March 2019

Adverts CPG - March 2018

Air Quality - January 2021

Amenity - January 2021

Basements - January 2021

Biodiversity CPG - March 2018

Design - January 2021

Developer Contribution CPG - March 2019

Employment sites and business premises - January 2021

Energy efficiency and adaptation - January 2021

Housing - January 2021

Transport - January 2021

Water and flooding CPG - March 2019

Other guidance:

Fitzroy Square Conservation Area Appraisal and Management Strategy 2010

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. ASSESSMENT

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

7	Land use
8	Impact on neighbouring amenity
9	Heritage and Design
10	Sustainability and Energy
11	Transport
12	Air Quality
13	Basements
14	Water and Flooding
15	Trees, Greening and Biodiversity
16	Employment and Training Opportunities

7. LAND USE

7.1 Policy G1 of the Local Plan expects development to take place throughout the borough with the most accessible growth to be delivered through the growth areas of King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road.

Proposed Office Space

- 7.2 Policy E1 of the Local Plan seeks to direct new office development to the growth areas mentioned above, as well as Central London, and the borough's 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 partly consists of an existing vacant office building (Class E) located within the Central London Area and the Knowledge Quarter Innovation District. The proposed development would deliver 763sqm GIA of additional office floorspace at the site. As such, the proposed increase in office floorspace is considered acceptable and would be in accordance with Policy E1 of the Local Plan.

Mixed Use Policy H2

7.4 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, the Council requires 50% of all additional floorspace to be provided as self-contained housing. This is required to be provided on site, particularly where 1,000sqm of additional floorspace is proposed. Policy H4 (maximising the

supply of affordable housing) sets out when we will seek affordable housing, and the quantity of the type of affordable housing we expect. Sub-paragraph G) of H4 states that where developments have capacity of fewer than 10 additional dwellings, the Council will accept a payment-in-lieu

- 7.5 The proposed development would result in an overall uplift of 860sqm, which generates a requirement of 430sqm to be residential (50%). However, the proposal also involves 97sqm of additional residential floorspace by virtue of the proposed roof extension to no. 71 Warren Street. The 97sqm is therefore subtracted from the 430sqm figure to leave a residential shortfall of 333sqm.
- 7.6 Sub-paragraph B) of policy H4 states that 100sqm is generally considered able to create capacity of 1 home. Therefore, 1000sqm of new residential floorspace would be required generally for onsite affordable housing (10 additional dwellings x by 100sqm). This development therefore would not be expected to provide onsite affordable housing as the required residential floorspace is less than 1000sqm.
- 7.7 Policy H2 provides a set of criteria which will be considered when determining where self-contained housing is required as part of a mix of uses. These include
 - a. the character of the development, the site and the area;
 - b. site size, and any constraints on developing the site for a mix of uses;
 - c. the priority the Local Plan gives to the jewellery sector in Hatton Garden;
 - d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
 - e. whether the development in publicly funded or served a public.
- 7.8 Policy H2 also states that where the Council is satisfied that providing onsite housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally, a payment-in-lieu.

Residential Study

- 7.9 During pre-application discussions the applicant produced a detailed residential study which explored the implication of providing a scheme with onsite additional self-contained units. The provision of onsite housing was discounted for the following reasons:
 - The proposal seeks to provide enhanced and high-quality commercial space within the Knowledge Quarter and Central London area and a retrofit approach has been taken to reduce the amount of demolition for circular economy reasons. The only realistic way of achieving the additional self-contained residential space onsite would be within the

- existing commercial building. Residential space within the commercial building would compromise the floorspace, resulting in inefficient and inflexible floorplans with reduced natural light and outlook, which would make the office space unattractive to prospective tenants.
- This would also require new core and separate cores, resulting in further demolition, and loss of usable floorspace in what is an already constrained building.
- Having residential units surrounded by commercial units would raise concerns over noise, vibration and privacy, depending on future office occupier.
- The existing buildings do not match in terms of floor levels, meaning that joining the buildings laterally would be difficult without substantial levels of demolition.
- There is concern over the quality of any residential space towards the north side of the building facing Euston Road. Noise and poor air quality on this elevation would compromise the quality of accommodation here and indeed the windows proposed on this elevation are non-opening. This would result in single-aspect residential units on the south side and the office space would be limited to the north side of the building, with reduced daylight and sunlight.
- A viability exercise during pre-application discussions showed that providing residential floorspace within the commercial building would put the scheme in deficit.
- The below diagram shows options for a typical floorplan which includes additional onsite residential floorspace:

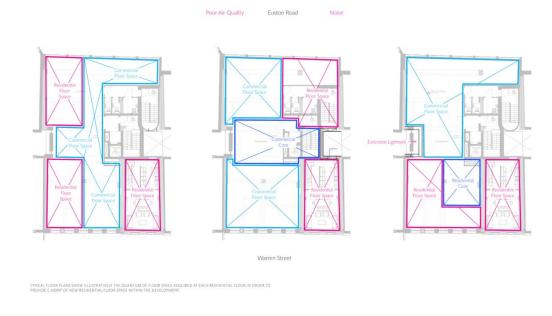


Figure 2. Options for onsite residential floorspace

7.10 During pre-application discussions, the option of converting the existing townhouse into smaller flats was also explored as a way to provide additional

units within the scheme. This however was discounted, as there would be insufficient space to accommodate the new, separate cores, entrances and fire lobbies required by Building Regulations, which would have resulted in undersized units. It should be noted that this would not have increased the amount of residential floorspace in terms of GIA which is the policy requirement and instead would just have provided a different typology of housing.

- 7.11 Therefore, given the impact onsite residential provision would have on the quality and layout of the existing and proposed commercial space, the poor standard of housing it would deliver, the further demolition it would require and the potential issues of noise/vibration and privacy it could subject future residents to, officers are satisfied in this instance that onsite provision of residential accommodation, beyond the 97sqm proposed, would not be the optimal solution in this case. It is also noted that policy H2 seeks 50% residential particularly where 1,000sqm additional floorspace is proposed, and this scheme would provide less than 1,000sqm.
- 7.12 The applicant does not have any land ownership interests in any other site close to the application site and so the provision of off-site housing is not considered feasible in this instance. The difficulty of finding additional sites to provide off-site housing is noted in the Housing CPG para. 5.28, stating that 'in recent years opportunities to acquire potential delivery sites at relatively low costs have diminished, and it has no longer been possible for developments to meet initial off-site targets in full'.

Payment-in-lieu of housing

Policy H2 states that where onsite and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for housing, we may accept a payment-in-lieu for housing, fairly and reasonably related in scale and kind to the development proposed and secured via section 106 legal agreement. For non-residential schemes such as this a rate of £1,500 per sqm GIA will generally apply to shortfalls in the provision of market or affordable housing. The applicant, since the submission of the application, has agreed to make a payment-in-lieu (PIL) for self-contained housing which will be secured under the s106. The total figure is £499,500 and is calculated as follows:

Total addition to floorspace	860sqm
Self-contained housing floorspace target	860 x 50% = 430sqm

Onsite addition to self-contained housing floorspace	97 sqm
Self-contained housing shortfall	333sqm
Total payment-in-lieu of self-contained housing (shortfall GIA x £1,500 per sqm)	333 x £1,500 = £499,500

7.14 Given the application site is predominantly a commercial building located within the CAZ and Knowledge Quarter, the refurbishment and intensification of the existing office use is appropriate and would help contribute to a successful and inclusive economy. Although no on-site housing is provided in this instance for reasons of feasibility, a financial contribution towards self-contained housing is proposed. Therefore, on this basis, and given the other public benefits arising from the scheme including the provision of additional workspace, the development is considered to accord with the Camden Local Plan and the London Plan and is acceptable in land use terms.

8. IMPACT ON NEIGHBOURING AMENITY

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

8.2 Daylight and sunlight

- 8.3 A Daylight, Sunlight and Overshadowing Report has been submitted as part of the application which details any impacts upon neighbouring properties.
- The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 8.5 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit

making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

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

Categorising impacts and alternative targets

- 8.7 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.
- 8.8 Table F1 of the BRE guidance indicates suggested alternative VSC targets based on street width to building height ratios. For example, the ratio for the

Warren Street side is just over 1.5, which would equate to a retained VSC target of 22%.

8.9 The approach is supported by the London Plan. The LP Housing SPG states:

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

8.10 Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative negative impact on the VSC, and on the area receiving direct skylight. Where there are balconies which can cause obstruction, the BRE guidelines suggest modelling the impacts with and without the balconies. This allows you to test whether the presence of the balcony or overhanding walkway, rather than the size of the new obstruction (the proposed development), is the main factor in the relative loss of light.

<u>Assessment</u>

8.11 The daylight/sunlight report submitted indicates that 97 out of 107 windows assessed under VSC would comply with the BRE guidance for daylight, which equates to about 91%, and all 7 windows tested for sunlight impacts would comply with the BRE guidelines. The 10 windows which fall below the VSC targets for daylight (i.e. the VSC being below 27% and a reduction of more than 20%) are located at 67 and 68 Warren Street, and are located on the north elevations of these buildings. Given these windows are north facing, and face onto a narrow lightwell area with taller buildings to the north on the south side of Euston Road, the existing VSC levels are already low. This is especially true for the windows at the lower levels of these properties. 6 windows at 67 Warren Street have existing VSC levels below 15%, and 6 windows at 68 Warren Street have existing VSC levels below 15%. Therefore, although some of these windows would experience reductions of 44%, the absolute reduction would be 4.6. When the existing VSC is already low, small absolute reductions would not be significantly noticed. It is also noted that both these properties will meet the BRE targets for sunlight under the APSH test. Historic floor plans for these properties suggest that they are dual aspect units with south facing windows onto Warren Street. As such, the overall impact in terms of daylight/sunlight is acceptable and the units will retain an acceptable amount of daylight and sunlight.

Noise

- 8.12 The proposal would involve the installation of various plant units at roof level, which would be above the height of neighbouring residential receptors. A noise impact assessment report has been submitted which has determined the noise limits for the nearest residential receptors. Conditions are attached to ensure that noise and vibration from the units do not exceed the Council's minimum standards (19 and 20).
- 8.13 The proposal also involves the provision of amenity terrace spaces at the upper floors of both the commercial and residential elements of the scheme. The terraces have the ability to generate noise and given the proximity to residential occupiers, a condition (22) is attached to limit the use of the commercial terraces to between 08:00 and 20:00 Mondays to Fridays, and not at all on weekends or bank holidays. The office terraces would be located above the height of neighbouring residential windows which would provide a sufficient distance to sensitive receptors. Warren Street also has a commercial character with existing noise generating uses such as pubs and restaurants found in the vicinity of the site. As such, the proposed hours are acceptable in this location. A condition (23) is also attached to ensure that no music from the terrace can be audible at nearby premises. The proposed residential terrace is not considered to be excessively large so that it would generate unacceptable noise at neighbours.

Privacy

8.14 The proposed terraces would be stepped back from the front elevation of the buildings and would not provide direct overlooking into neighbouring residential windows at 67 Warren Street. The application site is located approx. 17.6m from the buildings on the south side of Warren Street which is considered to be an acceptable distance. Windows are proposed on the west elevation of the building, and the massing would be pushed out westwards compared to the existing layout. These windows however would be small with deep reveals, and would be at 90 degrees to the windows on the rear of 68 Warren Street. Views therefore out of the proposed windows into neighbouring windows would be very limited and oblique in any case.

9. HERITAGE AND DESIGN

Designated and non-designated heritage assets

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

9.2 The site itself is neither locally or statutorily listed, nor is it located within a conservation area. It is however located directly adjacent to 63-68 Warren Street, a terrace of Grade II buildings immediately to the west of the site, and the Fitzroy Square Conservation Area is located to the west and south of the site. Further to the west and southwest are nos. 56, 58-62 and 159-161 Warren Street which are also Grade II listed. However, these are located a sufficient distance away from the site so as not be impacted. The boundary of the conservation area follows the party wall between the application site and no. 68 Warren Street and then sits halfway along Warren Street with the buildings on the south side directly opposite the site located within the conservation area. The map below shows the boundary of the conservation area (in beige) and the Grade II listed buildings (dark blue).

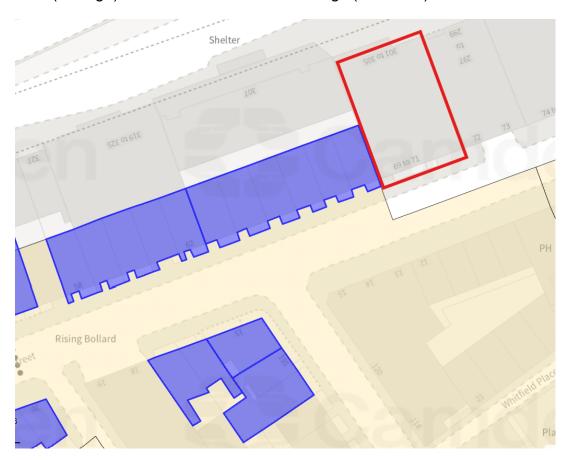


Figure 3 – map showing the nearby heritage assets

Fitzroy Square Conservation Area – Less than substantial harm

9.3 The significance of the conservation area comes from it being an excellent example of Georgian town planning and retains a relatively homogenous, distinctive and consistent character which combined dwellings with ancillary uses and services. Although Fitzroy Square itself is the principle focus of the area, the remainder of the area such as Warren Street is characterised by three or four storey townhouses.

9.4 The proposal would increase the height of the building, which sits right on the boundary of the conservation area. It is noted that the height of buildings increases to the east on the north side of Warren Street, towards Tottenham Court Road, and these buildings are outside of the conservation area. The proposal would bring the increased height closer to the conservation area, disrupting the consistent building height line. Noting the historic height difference at the eastern end of Warren Street, the harm identified is less than substantial and at the lower end.

63-68 Warren Street - Less than substantial harm

- 9.5 63-68 Warren Street consists of a terrace of four storey grade II listed townhouses, although number 68 is a storey lower with a mansard roof extension. They were built in around 1792, and restored in 1985. Their significance is their townscape value and their associational and evidential value as part of the late 18th century development of Fitzroy Square and its surrounds. They are examples of the consistent and strong Georgian architecture of the conservation area, representing the town planning of the time.
- 9.6 Given the increase in the height of the application site which would take the height considerably above the height of the listed properties, there would be a loss of open sky over the roofs, especially when viewed eastwards down Warren Street, and the consistent existing height line would be disrupted. The additional massing, although raked backwards, would appear as dominant against the terrace. That said, there would be some improvement to the frontage of the site in terms of materials when compared to the existing white render, and the fenestration of the proposed building would better relate to the terrace. Overall, less than substantial harm is identified to the setting of the listed buildings.
- 9.7 Considerable weight and importance should be given to the harm to the conservation area and the listed buildings as identified above, and it should be outweighed in the balance by considerable public benefits. The design involves a setback and raked roof extension, which would reduce the bulk, and this was encouraged through pre-application discussions. The design of the Warren Street façade also helps to tie it in better with the adjacent heritage assets to reduce the harm.
- 9.8 Paragraph 215 of the NPPF states:
 - 215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 9.9 The scheme would provide a number of public benefits, including but not limited to: a payment-in-lieu for housing, additional employment space,

training opportunities and apprenticeships, transport contributions, and would bring a vacant residential property back into use. Further discussion on the public benefits of the scheme can be found in section 18 of the report which will conclude on the planning balance in the light of the remaining sections of the report assessment.

Urban Design

Form and massing

- The proposal retains the position of the frontage on Warren Street, so that it 9.10 continues to align with both neighbours either side. On the Euston Road, the ground floor aligns with the eastern neighbour, with floors 1 to 4 aligning with the flat party wall of the western neighbour and floors 5, 6, and 7 are raked back to recede from the street and reduce the impact of the increased height here. The ground would be pushed back by 2m compared to the existing condition, thereby creating more space on the pavement although there is an overhang above. The proposed active frontage and natural surveillance would help to reduce any potential anti-social behaviour here. The middle floors would align with the western neighbour at 307 Euston Road and therefore is pushed forward by 1.9m compared to the existing condition. The changes to the building line are considered to integrate well with its neighbours. The increased height on the Euston Road side would be comparable with existing buildings in the area, and stepped back form reduces the sense of bulk. This form references and has drawn inspiration from Camden modernist housing developments across the borough. The Warren Street side has a very different character than the Euston Road side, being more domestic, low rise and of more heritage value. The impact of the massing on the conservation area and listed buildings has been discussed above.
- 9.11 The single storey extension to the residential building would be appropriate in terms of scale and materiality extension that would be sympathetic to the appearance of the townhouse.
- 9.12 The proposed development would provide an adequate amount of outdoor amenity space for both the commercial and residential elements, which is welcomed given the dense urban location of the site.
- 9.13 The applicant has engaged in pre-application meetings with the Council, and the design was reviewed by the Camden Design Review Panel (DRP) in December 2024. The panel thought that the proposed height could be acceptable in principle, but considered that this should be supported through design excellence and social value. They suggested that the designs should be confident and joyful, expressing concern at the Euston Road design for being too bulky. They asked for frontages to be more open and attractive at ground floor, and encouraged more work on sustainability. With the further

work undertaken by the applicant since the DRP, officers are confident that the submitted designs successfully address the issues raised by the DRP.





Figure 4 – DRP scheme Dec 2024 (left) and current proposal (right) of the Euston Road elevation

Street frontage

9.14 The proposal improves the activation on both Warren Street and Euston Road, achieved through increased numbers of entrances and glazing that better relates to the street. On Warren Street, the commercial building includes a western glazed entrance and centralised fixed glazing into a retail / workspace at ground floor and a shared glazed entrance into upper level workspaces. Whilst the exact layouts of ground floor are unknown, the applicant has provided sketch layouts within the submitted Design and Access Statement to describe potential layouts, all of which include active uses at the street facing edges. The proposal for the residential building includes a new window in place of the existing entrance, which is relocated in place of the existing garage door. This is considered an improvement on the existing condition, and contributes better to the street.

On Euston Road, the proposed northern frontage to the ground floor retail / workspace will bring positive activity to the street, with glazing and a central entrance on the western side. The glazing is complimented with a solid base, acting as a stall riser, with integrated planters to provide greenery to the

street. At the eastern side, a bike store entrance is located with fire exit doors. These are glazed to provide further activity.

Strategic and local views

- 9.15 From the west on Warren Street looking east, the proposed development presents a significant increase in scale above the neighbouring terrace. The impact of this is improved by the raking back of upper floors, so that the direct scale on the street is minimised. The use of traditional forms, in the inclusion of a brick gable and vertical 'chimney', along with a contextual brickwork assist further in achieving a proposal that responds to character whilst achieving a densification of the site. From the east of the site on Warren Street looking west, the increase in scale is less apparent due to the main parts of the extension being sat behind foreground buildings. The use of framed windows and comparable brickwork helps the proposal appear more as a completing part of the terrace when compared to the existing condition with curtain walling.
- 9.16 From the north, the proposal projects above the existing tree canopies along Euston Road, whereas the existing building does not. This projection contains the new upper floors, including top floor plant area which is contained within a series of angled fins, ensuring a high-quality design is carried across the entire building envelope. From the west on Euston Road looking east, the increase in scale is partially shielded by the projecting frontage of 307 Euston Road. The proposed frontage provides an improvement to the existing condition, with the stepped upper floors contributing to a comfortably managed change to the scale. From the east on Euston Road looking west, the proposed projection forward from the existing building line is apparent. At ground floor, this is cut back so that the frontage aligns with the neighbour at 297 Euston Road and enlivened with entrances and glazing. Above this, the frontage of vertical fins and glazing with textured panels between provides a positive contribution to street frontage.
- 9.17 The site is partially within the LVMF view 2A.2, from Parliament Hill summit to the Palace of Westminster and in close proximity to LVMF view 2B.1 from Parliament Hill oak tree to Palace of Westminster. The top of the proposal has an AOD of +55.62m, with the LVMF 2A.2 above +70m and 2B.1 around +60m at the site. Being well below the LVMF views, it is expected that the proposal will have no impact on these strategic views.

Details and Materials

9.18 The proposal uses different details and materials on the two streets, with each façade using a design language appropriate to the context. On Warren Street, the proposed brickwork with punched openings reflects the dominant street character. On Euston Road, the mixed character has been interpreted

as an opportunity for a bold contemporary appearance that suits a good internal environment with a lightness and considered proportions to achieve a positive addition to the street.

- 9.19 The Warren Street brickwork in an English Bond has been designed to blend well with the existing street, which is primarily brick. The window openings are formed as deep reveals with a subtle header detail at the top of the window that is a contemporary interpretation of the existing keystone brick details found on the terrace to the west. Recessed brick window jambs provide further visual interest. Precast projecting cills and light coloured casement window frames continue the contemporary interpretation of traditional detailing. At ground floor, the stucco render is taken from the eastern neighbours and helps to differentiate this floor from the commercial uses above. The arched entrance doors interpret the existing neighbouring ground floor entrances in a modern, fully glazed opening. At the top of the building, the sloped gable and vertical 'chimneys' give a broken top to the proposal that interprets local character.
- 9.20 On Euston Road, the façade is composed of layered parts, with projecting verticals, intersecting profiled spandrels with open glazing set between. This simple language provides a calm and elegant appearance, expressing the structural arrangement whilst taking subtle cues from the existing neighbours. Glazing is large format and fixed, maximising light and views out from within the office floors and aiding the visual lightening of the elevation. At the upper parts of the building, visual interest is achieved by stepping back in alternating sequence of slopes and verticals. At the top, this incorporates the plant enclosure within the architectural treatment. The primary material is a warm, lightly coloured pre-cast concrete, with smooth faces to the verticals and horizontal textured ribs on the spandrels. Further details of the materials are secured via condition (6)
- 9.21 Overall, the scheme, would be a considerable improvement compared to the existing condition and would represent good quality and contextual design. It would enhance the existing streetscene condition on both elevations which currently feels hostile and unattractive and the architecture would tie in better with the surrounding context. The creation of more active frontages at ground floor, and a more contextual design that would integrate better with the public realm, would introduce more natural surveillance and activity which would in turn positively impact on both streets. The current Warren Street elevation feels incongruous and anomalous, and the Euston Road side feels hostile and inactive. Improving the street facing condition on both sides is a considerable public benefit of the scheme that would help offset the heritage harm identified and weighs positively in the planning balance. This scheme would therefore meet the aims of policies D1 and D2 of the local plan.

10. SUSTAINABILITY AND ENERGY

- 10.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.
- In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Redevelopment strategy

- The proposal involves part demolition, extension and reconfiguration of the existing buildings. Rather than demolition of the entire building, 70% of the floor structures would be retained and 30% to be demolished. Much of the fabric on the existing facades would be removed and parts of the floor slabs would be removed to allow the upwards extension. The current building does not meet Building Regulations standards and there are issues with the thermal performance of the existing fabric. Replacing this fabric will improve the energy efficiency of the building. When considered as a whole in the context of the overall site, the proposal is not considered to amount to substantial demolition. As such, the applicant is not required to provide a condition and feasibility study in order to justify the demolition. The proposal would therefore follow core principles of sustainable development and circular economy.
- To ensure greater resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use (condition 17).

Energy and carbon reductions

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

Energy and carbon summary

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

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15% non- residential	39.7 %
Be green stage (renewables): CLP policy CC1	20%	6.5 %
Total carbon reduction: LP policy SI2 and LP CC1	35%	36 %

Table 2 - Carbon saving targets and the scheme results

Be lean stage (reduce energy demand)

- 10.7 London Plan policy SI 2 sets a policy target of at least a 10% (residential) / 15% (non-resi) reduction through reduced energy demand at the first stage of the energy hierarchy. It is noted however that non-major applications should not increase on the baselines.
- In this case, the development exceeds the policy target of 15% (non-resi) reducing emissions by 39.7% at this stage through energy efficient design, in compliance with the development plan. The proposals involve high performance insulation, low air permeability, efficient glazing, and addresses the requirements of the cooling hierarchy and overheating which can reduce the use of active cooling in the development. The proposal includes energy efficient measures like MVHR.

Be clean stage (decentralised energy supply)

London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network. Although this is not a major application, connecting to a district heat network was looked at however it was considered to be unfeasible.

Be green stage (renewables)

- 10.10 Camden Local Plan policy CC1 expects developments of more than 500sqm of any gross internal floorspace to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 10.11 In this case, the development would fall short of the policy target of 20%, reducing emissions by 6.5% at this stage through PV panels on the roof (with full details of these secured by condition 8). The proposal includes low carbon heating like Air Source Heat Pumps (ASHPs), which are proposed on the roof of the building however these being partly reliant on electricity from the grid to run are considered under the be-lean stage so do not contribute

towards the renewables 20% target. A condition will be added to secure a meter to monitor the energy output from the approved renewable energy systems (condition 7).

Camden Local Plan policy CC1 and Camden Planning Guidance 'Energy 10.12 Efficiency and Adaptation' Jan 2021 states that medium development of floorspace 500sqm and <1,000sqm should seek the greatest possible overall CO2 reductions below Building Regulations and 20% reduction form on-site renewables after all other energy efficiency measures have been incorporated. In this case, the development would achieve 36% reduction overall, although does not achieve a 20% reduction in CO2 emissions through renewable technologies. However it should be noted that the energy assessment utilises the new 2021 Building Regulations as the baseline in line with the London Plan Policy SI2 criteria for energy assessments supporting major applications, whereas the CPG target which pre-dates the London Plan expresses its target values against the 2013 Building Regulations. Whilst this does not mean that the 20% CPG target for renewables would necessarily be met if calculated against the 2013 Building Regulations, it would show far less of a shortfall. In addition, the reductions have been maximised as far as reasonably possible, given the constraints of the building and the limited roofspace available for PV panels.

Climate change adaption and sustainable design

- 10.13 Local Plan policy CC2 expects non-residential developments of 500sqm, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. The proposal would achieve BREEAM Excellent rating.
- 10.14 The proposal would include sustainable drainage and bio solar roofs. An overheating assessment has been undertaken to demonstrate that active cooling is required for the commercial element of the scheme. This is however in part due to the non-opening windows on the Euston Road side due to noise and air quality issues which prevents cross ventilation. Steps have been taken to reduce the demand for active cooling. Passive measures like deep window reveals, an appropriate solid and void façade design, especially on the south elevation and high-performance glass have been incorporated in line with policy CC2.
- 10.15 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 10.16 In this case, the development incorporates a green roof integrated with the solar panels, which would enhance the biodiversity of the site and reduce water runoff. Details of this system will be secured by condition 10. Condition

24 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home. Flood risk is covered in the 'water and flooding' section of this report.

10.17 Overall, the scheme is acceptable in sustainability terms, in particular, through retaining and extending the existing building. The scheme would meet the policy target of BREEAM Excellent for non-domestic extensions of 500sqm. Although it doesn't meet the 20% reduction target for Be Green through renewables, the reductions have been maximised as far as possible, and an overall reduction of 36% is accepted.

11. TRANSPORT

11.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling, and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free. T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.

Trip Generation

The proposed office development with result in 763sqm uplift of floor space. The multi-modal trip generation was calculated by interrogating TRICS database and the mode share from 2011 Census. The net forecast person trips for the proposed development are presented in Table 5.2 of the Transport Statement and reproduced here:

Mode	Census	A	AM		PM	
Mode	Mode Split	Arrive	Depart	Arrive	Depart	
Underground / Overground	41%	23 (+7)	3 (+1)	2 (+1)	23 (+8)	
Rail	30%	17 (+5)	2 (+1)	2 (+1)	17 (+6)	
Bus	11%	6 (+2)	1	1	6 (+2)	
Taxi	0%	0	0	0	0	
Motorcycle	2%	1	0	0	1	
Car Driver	4%	2 (+1)	0	0	2 (+1)	
Car Passenger	0%	0	0	0	0	
Bicycle	7%	4 (+1)	1	0	4 (+1)	
Walking	6%	3 (+1)	0	0	3 (+1)	
Total	100%	55 (+18)	8 (+3)	6 (+2)	56 (+19)	

The proposal will result in a significant increase in trips. The anticipated high volume of the walking trips is likely to be made from Warren Street London Underground station, Euston Railway station, bus stops on Euston Road and Warren Street and nearby shopping, dining and entertainment venues. Considering the increase in active travel trips to and from the site, including cycling, the Council will seek to secure financial contributions towards the commitments of the Camden Transport Strategy, which seeks to invest in the borough's active transport infrastructure.

Travel Planning

- 11.4 A framework plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. Modal share projections for walking and cycling are acceptable.
- 11.5 A Travel Plan covering an associated monitoring and measures contribution of £11,348 will be secured by legal agreement.

Access and Permeability

- The Euston Road frontage will provide access to the ground floor unit for flexible retail or office use, a further door to a lift serving the lower ground floor level, and two doors at the east of the site providing emergency escape. Warren Street will offer three access points to: the flexible ground floor unit, the reception lobby for the upper floors, and the townhouse.
- 11.7 It is proposed to remove the footway crossover in front of the townhouse on the Warren Street side and reinstate a full-height kerb and discussed in the highways works section below. There is no motor vehicle access to the site.

Cycle Parking

11.8 The Council requires high quality cycle parking to be provided in accordance with Local Plan policy T1 and London Plan policy T5 which requires:

Business offices (Class E):

1 space per 75sqm (GEA) long stay,

First 5,000sqm 1 space per 500sqm, thereafter 1 space per 5,000sqm (GEA) short stay

Class C3 (dwellings):

1 space per studio or 1 person 1 bedroom dwelling, 1.5 spaces per 2-person 1 bedroom dwelling, and 2 spaces thereafter: 1 space per 40 dwellings short stay

- 11.9 The townhouse will benefit from an internal cycle store for 2 cycles.
- 11.10 For the offices the existing lower ground floor will be refurbished to provide 33 long stay cycle spaces comprising top-tier racks and Sheffield stands, with access via a lift. Lockers for up to 12 folding bikes will also be provided.
- 11.11 It is proposed to provide 6 short stay visitor cycle parking spaces in the form of Sheffield stands on Euston Road. This will include 3 additional Sheffield stands next to the existing 8 stands on Euston Road and these will be secured via section 106 legal agreement. Cycle parking details internally in the building will be secured via condition 16. Overall, the cycle parking is acceptable.

Car Parking and Vehicle Access

- 11.12 The site is located in controlled parking zone CA-E, which operates 08:30-18:30 Monday to Friday and 08:30-18:30 on Saturday. The development would be secured as car-free, secured via legal agreement.
- 11.13 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.' Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: 'All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided'.
- 11.14 Paragraph 5.19 of the Camden Planning Guidance on Transport states: 'For all major developments the Council will expect that disabled car parking is accommodated on-site.' Paragraph 5.20 further informs: '...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site'.
- 11.15 'National disability, accessibility and blue badge statistics: 2021 to 2022' published on 18 January 2023, report that on 31 March 2022, 4.3% of the population held a Blue Badge, an increase of 3.6% since March 2021'.
- 11.16 Therefore, it is considered appropriate to seek an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location within 50m from the site.

Construction Management

11.17 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process.

- 11.18 The site is located on Euston Road which forms part of part of TfL's Transport for London Road Network (TLRN). Tottenham Court Road (A400) is located just to the east of the site, and forms part of the Strategic Road Network (SRN). Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. More detailed Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents will therefore be secured by legal agreement.
- 11.19 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed with the Council.
- 11.20 Implementation support contributions of £4,194 and impact bonds of £8,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.
- 11.21 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by legal agreement if planning permission is granted.

Deliveries and Servicing

11.22 The delivery is projected to generate seven servicing trips per day. The office element of the proposal should be serviced entirely from the two existing loading bays on the Euston Roadside, including the refuse and waste collection. Only the townhouse should be serviced from the Warren Street side. A Delivery and Servicing Plan was provided as part of the application and will also be secured via section 106 legal agreement.

Highways Works

11.23 It is expected that significant damage to public highway is unlikely to be caused during demolition and construction, however a highways contribution of £20,000 would be secured via section 106 legal agreement to mitigate against any damage.

Pedestrian, Cycling and Environmental Improvements

11.24 New developments such as this proposal place pressure on the existing infrastructure and services benefit directly from new and improved safe and healthy street schemes which are being delivered across the borough which form part of the Camden Transport Strategy. In line with the increased walking and cycle trips generated by the proposal, a financial contribution of £80,000 would be secured via section 106 legal agreement. This would be put towards providing, 2 bike hangars, an on-street cycle parking bay, a double electric vehicle charging point parking bay, a rain garden, a car club parking bay, enhanced public, road safety, kerbside changes, two-way cycling and urban greening enhancements to Warren Street, Better Bus Partnership, and highways improvements within the Knowledge Quarter.

Micro and shared mobility improvements

- 11.25 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area.
- 11.26 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 11.27 A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured as a Section 106 legal agreement. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g. by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

12. AIR QUALITY

12.1 Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough. Given the development would add additional sensitive uses and has the potential to have an adverse impact on local air quality, an Air Quality Assessment (AQA) has been submitted as part of the application and assessed by the Council's Air Quality Officer.

Operational impact of development on the local area

The proposal is considered to be air quality neutral as there will be no combustion heat sources and would be a car free development. A diesel emergency backup generator is proposed for life saving purposes in the event of an emergency and loss of power the generator would provide power including for sprinklers. The flue serving the generator will terminate 1m above roof level and will be the tallest point within a 20m radius. A condition (11) is attached to secure further details of the backup generator. It is anticipated that the generator will be started on a weekly, or at minimum, monthly basis, with a full test conducted annually. Total annual testing time will remain under the 50-hour limit.

Operational impact on occupants

- 12.3 The application site is located within the Marylebone Road from Marble Arch/Euston King's Cross Junction air quality Focus Area. The proposal would introduce a new residential receptor at the fourth floor and roof level above the existing residential use on the lower floors. However, the residential element of the scheme faces onto Warren Street, located away from the polluting sources of the heavy traffic on Euston Road. The air quality modelling submitted shows that the residents in the house will experience acceptable air quality conditions, with pollutant concentrations well below the national air quality objectives across the site. The assessment concludes that the overall operational air quality effects of the development are not significant, which is noted and agreed with based on the presented data. It is noted that PM2.5 concentrations slightly exceed Camden's local objective of 10 μg/m³, reaching up to 10.2 μg/m³ at the ground and second floors of the residential receptors. This exceedance is considered minor and localised and does not affect the newly introduced residential exposure areas on the upper floors. The impact is therefore not expected to result in significant adverse effects on future occupants. In terms of the commercial elements of the scheme, the concentrates will be below the objectives.
- 12.4 Mechanical Ventilation with Heat Recovery (MVHR) is proposed. Details of the locations of the air inlets have been submitted and are considered acceptable and to be away from areas of poor air quality. Nonetheless, a condition (13) is attached to requiring details of the mechanical ventilation to be submitted to ensure the inlets are located away from busy roads or other emission sources such as the proposed diesel generator.

Construction impact risk assessment

12.5 The impact of dust soiling from demolition and construction works have been assessed as being 'medium risk'. As such, at least 2 air quality monitors are required to be put in place more than three months before to construction to record the baseline and background emission levels, which will be secured via condition (3).

13. BASEMENTS

- 13.1 Camden Local Plan policy A5 seeks to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation and design terms.
- The application involves the lowering of the existing basement in the northeast corner of the site by approx. 1.2m below the commercial and residential elements of the site to accommodate more generous floor to ceiling heights.
- 13.3 The application was accompanied by a Basement Impact Assessment (BIA) which has been independently reviewed by the Council's third-party basement consultant (Campbell Reith). The proposal is considered to be low risk, and although there are some outstanding queries to be closed out, a Basement Construction Plan would be secured under the section 106 legal agreement in order to seek further details of the basement construction methods to ensure it is complaint with the Council's CPG on Basements. Details of the basement engineer's qualifications are secured via condition 5 to ensure the work is carried out appropriately.

14. WATER AND FLOODING

- 14.1 Policy CC3 of the Local Plan is relevant and seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 14.2 The site has a medium to high risk of surface water flooding and is located in an area with secondary A aquifer, with potential for groundwater flooding. A Flood Risk Assessment has been submitted and reviewed by the Lead Local Flood Authority (LLFA). Given the proposal involves the extension of an existing basement which could be susceptible to flooding, a number of flood risk measures and SuDs are proposed. These include the provision of freeboards and drains. In addition, the residential element of the basement would be used for ancillary storage and for non-habitable rooms. Further details of the flood risk mitigation measures are secured via conditions 14 and 15, including evidence of the SuDs measures, freeboards, elevated grates in the lightwell and raised floor levels.

15. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

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.

- There are no trees or areas of any vegetation within the application site. The proposal would involve the provision of planting and bird and bat boxes on the external terrace amenity spaces of the office located at fifth, sixth and seventh floors. Additional planting within planters are also proposed at ground floor on both the street elevations. A green roof is also proposed on the lift and stair core with two-solar panels to create a bio-solar roof. Details of the green roof and bird and bat boxes are secured via conditions (7 and 10).
- 15.3 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan.

Statutory Biodiversity Net Gain

- 15.4 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 15.5 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.
- This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits.
- 15.7 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this scheme will not require the approval of a BGP because it is below the *de minimis* threshold. This is because it does not impact an 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.

16. EMPLOYMENT AND TRAINING OPPORTUNITIES

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

During construction

- Apprenticeships the applicant will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs (or every 1,000sqm GIA newbuild) with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the council's Euston Skills Centre (moved to a new location hence a new name). With an estimated build cost of £11 million this would mean 3 construction apprentices and a £5,100 support fee.
- Construction Work Experience Placements the applicant should provide one construction work placement opportunity of not less than 2 weeks, to be undertaken over the course of the development construction. This would be recruited through the council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.
- Local Recruitment the applicant will work with the Euston Skills Centre
 to recruit to vacancies, targeting 20% local recruitment, advertising with
 Camden for no less than a week before the roles are advertised more
 widely.
- Local Procurement the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area. The Economic Development Team will liaise and assist with the developer to provide details of local suppliers and subcontractors.
- The above measures would be included in a package of **Employment and Training measures secured by s106 agreement** in accordance with CLP policy E1 and the CPG.

17. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 17.1 The CIL applies to all proposals which add 100m2 of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m2) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.
- 17.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of £159,100.
- 17.3 The proposal will also be liable for the Camden Community Infrastructure Levy (CIL). The site lies in Zone A where CIL is calculated using rates based on the relevant proposed uses. The estimated Camden CIL liability is £94,600.

18. CONCLUSION

- 18.1 Overall, the proposed scheme is considered to be a carefully designed scheme, taking account of the constraints of the site, and the differing contexts of Euston Road and Warren Street. The size, scale and design of the proposed extensions are considered to represent sympathetic additions that champion modern design whilst being respectful of the surrounding conservation area and listed buildings.
- Although the increased massing and height up against the listed buildings and conservation area on Warren Street would result in less than substantial harm to these heritage assets, the scheme would provide sufficient public benefits as detailed below that would outweigh this harm. The proposed design through discussions with officers has sought to minimise this harm through setting back the additional height to reduce the bulk, and through a more contextual elevation design on Warren Street. The scheme would help to enhance a hostile and unattractive part of the borough, and would integrate better with the public realm and improve the sense of place along both Warren Street and Euston Road. The scheme would tie in better with the surrounding context, create active frontages, and would be a catalyst for future investment and development along Warren Street and Euston Road.
- The proposed extension of the office building in this strategic location is supported, and would satisfy a number of the Council's local plan policies and would deliver employment benefits. The absence of on-site housing is regrettable, however, given the constraints and difficulties in providing good quality residential and commercial accommodation, it is accepted in this instance. The lack of housing would be mitigated by the financial contribution (payment in lieu) towards affordable housing which would be secured via the section 106 legal agreement.
- 18.4 The scheme has been designed sensitively in regards to the amenity of neighbouring residents. The daylight/sunlight impacts to neighbours are considered acceptable overall and would continue to receive light levels appropriate in a central London location.
- 18.5 The scheme would also retain and adapt an existing building for modern purposes which is supported by the Council.
- 18.6 The application is therefore recommended for approval subject to conditions and the signing of a s106 legal agreement.

Public benefits

18.7 Harm has been identified to heritage assets, the scheme has been designed to try and minimise that harm, but there remains harm which is considered to be less than substantial. Considerable weight and importance must be

given to that harm and there are a number of public benefits that outweigh that harm.

- Increased employment floorspace.
- Revitalisation of an unattractive and hostile part of the borough, creating a greater sense of place and improving the overall streetscene.
- A payment in lieu towards affordable housing.
- Bringing a vacant residential building back into use through reuse and remodelling rather than redevelopment which is a more sustainable solution.
- Employment and training opportunities including construction apprenticeships.

19. RECOMMENDATION

- 19.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:
 - Payment in lieu towards affordable housing of £499,500
 - Construction management plan (CMP)
 - CMP and implementation support contribution of £4,194
 - CMP Impact Bond of 8,000
 - Construction Management Plan Community Working Group
 - Car free development
 - Travel plan and associated monitoring and management of £11,348
 - Off-site accessible car parking contribution of £4,000
 - Delivery and Servicing Plan
 - Highways works contribution of £20,000
 - Pedestrian, Cycling and Environmental Improvement contribution of £80,000
 - 3 cycle parking stands on Euston Road
 - Micromobility Improvements contribution of £10,000
 - Basement Construction Plan
 - Construction apprenticeships support fee of £5,100
 - Construction apprenticeships (3)
 - Construction placements (1)
 - Local recruitment and procurement

20. LEGAL COMMENTS

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

21. CONDITIONS

Standard conditions

1 Time limit

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

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

2 Approved drawings

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

Existing Drawings:

EWS-FLA -ZZ -00 -DR -A-05-001, EWS-FLA -ZZ -00 -DR -A-05-002, EWS-FLA -ZZ -ZZ -DR -A-05-020, EWS-FLA -ZZ -ZZ -DR -A-05-021, EWS-FLA -ZZ -ZZ -DR -A-05-031, EWS-FLA -ZZ -00 -DR -A-05-010, EWS-FLA -ZZ -01 -DR -A-05-011, EWS-FLA -ZZ -02 -DR -A-05-012, EWS-FLA -ZZ -03 -DR -A-05-013, EWS-FLA -ZZ -B1 -DR -A-05-009, EWS-FLA -ZZ -RF -DR -A-05-014

Demolition Drawings:

EWS-FLA -ZZ -00 -DR -A-05-050, EWS-FLA -ZZ -01 -DR -A-05-051, EWS-FLA -ZZ -02 -DR -A-05-052, EWS-FLA -ZZ -03 -DR -A-05-053, EWS-FLA -ZZ -B1 -DR -A-05-049, EWS-FLA -ZZ -RF -DR -A-05-054

Proposed Drawings:

EWS-FLA -ZZ -ZZ -DR -A-05-200, EWS-FLA -ZZ -ZZ -DR -A-05-201, EWS-FLA -ZZ -ZZ -DR -A-05-202, EWS-FLA -ZZ -ZZ -DR -A-05-203, EWS-FLA -ZZ -ZZ -DR -A-05-300, EWS-FLA -ZZ -ZZ -DR -A-05-301, EWS-FLA -ZZ -ZZ -DR -A-05-302, EWS-FLA -ZZ -ZZ -DR -A-05-303, EWS-FLA -ZZ -ZZ -DR -A-05-400, EWS-FLA -ZZ -ZZ -DR -A-05-401, EWS-FLA -ZZ -00 -DR -A-05-060, EWS-FLA -ZZ -00 -DR -A-05-100, EWS-FLA -ZZ -01 -DR -A-05-101, EWS-FLA -ZZ -02 -DR -A-05-102, EWS-FLA -ZZ -03 -DR -A-05-103, EWS-FLA -ZZ -04 -DR -A-05-104, EWS-FLA -ZZ -05 -DR -A-05-105, EWS-FLA -ZZ -06 -DR -A-05-106, EWS-FLA -ZZ -07 -DR -A-05-107, EWS-FLA -ZZ -B1 -DR -A-05-099, EWS-FLA -ZZ -RF -DR -A-05-108

Documents:

Cover Letter (Iceni), Daylight/Sunlight (Impact on neighbouring occupiers – GIA 26/06/25), Daylight/Sunlight (Internal – GIA 25/06/2025), Delivery Servicing Plan (TTP July 2025), Energy Statement (CPW 01/07/2025), London Plan Fire Statement (Jensen Hughes 03/06/25), Flood Risk Assessment (Robert Bird Group 15/10/25 rev P06), Planning Statement (Iceni July 2025), Statement of Community Engagement (Iceni July 2025),

Sustainability Statement (CPW 24/09/2025 P05), Transport Statement (TTP July 2025), Workplace Travel Plan (TTP July 2025), Noise Report (Sandy Brown 17/10/2023), Air Quality Assessment (Logika 22/09/25 rev 04), Basement Impact Assessment (Robert Bird Group 19/09/2025 rev P04), BNG Exemption Letter (Greengage 04/06/25), Design and Access Statement (Flanagan Lawrence July 2025), BREEAM V6 New Construction (Office) Pre-Assessment Report (CPW 26/06/25), BREEAM 2014 Refurbishment & Fit Out (Office) Pre-Assessment Report (CPW 26/06/25), Draft Construction Management Plan, London View Management Framework Vista from Parliament Hill: Desktop Assessment (Flanagan Lawrence July 2025)

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

Pre-start conditions (any works)

3 Air Quality Monitoring

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

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

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

Reason: Development must not commence before this condition is discharged to manage and mitigate the impact of the development on the air quality and dust emissions in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policies A1, A4 and CC4 of the Camden Local Plan 2017 and policy SI1 of the London Plan.

4 Impact on London Underground structures

The development hereby permitted shall not commence until the following documents, in consultation with London Underground Limited (LUL), have been submitted to and approved in writing by the local planning authority which:

- a) Identify existing LUL structures which are located in the vicinity of existing building and/or have interface with existing building foundation;
- b) The development must be shown to take no support from LUL land or property or to detrimentally change the loading on them. The applicant has to provide anticipated building load changes on LUL structures for temporary construction stage and permanent long term stage;
- c) Provide a Ground Movement Assessment (GMA) and this should consider the temporary and permanent changes in loading which may affect LUL structures and tunnels;
- d) Details of any proposed boreholes or piles shall be submitted to LUL and their written approval should be obtained. Driven piles will not be permitted in the vicinity of LUL's tunnels or other subsurface structure;
- e) Provide detailed design and Risk Assessment Method Statement (RAMS) for all demolition, temporary and permanent works;
- f) Provide detailed design and Risk Assessment Method Statement (RAMS) on the use of tall plant/cranes/scaffold;
- g) An assessment of railway noise and vibration shall be carried out and appropriate protective measures shall be taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration.

The development shall thereafter be undertaken in full accordance with the approved design and method statements, and all structures and works comprised within the development which are required by the approved design statements shall be completed, in their entirety, before any part of the building hereby permitted is first occupied.

Reason: To ensure that the development does not impact on existing London Underground/DLR transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

5 Details of Basement Engineer

The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, check for compliance with the design (as approved by the local planning authority and building control body) and monitor the critical elements of both permanent and temporary basement construction works throughout their duration. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.

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

6 Detailed design drawings and samples

Notwithstanding the details shown on the approved plans, prior to commencement of works (other than demolition and site clearance), detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

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

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

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

7 Bird and Bat Boxes

Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of bird and bat boxes shall be submitted

to and approved in writing by the Local Planning Authority. These should be incorporated into the fabric of the building where feasible.

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

8 PV Panels

Prior to commencement of above ground works, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells energy generation capacity and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells 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 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.

9 Secondary Aquifer Foundation Works Risk Assessment

Prior to commencement of works (other than demolition and site clearance), a Foundation Works Risk Assessment (FWRA) demonstrating that risks to groundwater and archaeology are minimised shall be submitted to and approved in writing by the local planning authority. The Foundation Works Risk Assessment (FWRA) must have regard to current available guidance including the Environment Agency's guidance 'Piling in layered ground: risks to groundwater and archaeology', and 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention' (National Groundwater and Contaminated Land Centre report NC/99/73) or any updates to guidance.

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

Prior to above ground works

10 Details of green or living roof

Prior to commencement of above ground works, full details of the living roofs in the areas indicated on the approved roof plan shall be submitted to and approved in writing by the local planning authority. The details shall include:

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

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

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

11 Diesel backup generators

Prior to commencement of above ground works details of the proposed Emergency Diesel Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. The flue/exhaust from the generator should be located away from air inlet locations. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.

Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017.

12 Air Source Heat Pump with Active Cooling (non-residential)

Prior to commencement of above ground works, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more), the refrigerants used in the system is of global warming potential at or lower than 675, SEER of at least 5.1, and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing.

The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided.

The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local plan Policies. Also to ensure that all development reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with policy CC2 of the London Borough of Camden Local Plan 2017

13 Mechanical Ventilation

Prior to commencement of above-ground development full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads, generator flue or any other emission sources and as close to roof level as possible, to protect internal air quality. The mechanical ventilation system should not be installed with cooling coil and shall be used for purposes of ventilation only. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan 2017 Policy CC4 and policy SI 1 of the London Plan 2021.

Prior to occupation or use

14 SuDs: Evidence of installation

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

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

15 Flood Protection Measures

Prior to occupation full details of flood protection measures including a FFL of +27.44m for entrances at risk of flooding in a 1 in 100 flood event plus climate change, plus details of freeboard and elevated grate at the lightwell shall be submitted to and approved in writing by the local planning authority. Systems shall thereafter be permanently retained and maintained in accordance with the approved details.

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

16 Cycle Parking

Prior to the occupation of the development hereby permitted, details of the provision to be made for cycle parking shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking shall thereafter be implemented in full in accordance with the approved details before the use hereby permitted commences and shall thereafter be retained solely for its designated use.

Reason: To ensure adequate cycle parking is available on site, to promote sustainable modes of transport, and so safeguard the visual amenity of the area in accordance with policies A1 and T1 of the Camden Local Plan 2017.

17 Reuse and recycling of demolition waste

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

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

Compliance conditions

18 Non-road mobile machinery (NRMM)

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

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.

19 Noise limits for plant

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

Reason: To ensure that the amenity of occupiers of the site and surrounding properties is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

20 Anti-vibration isolators for plant

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

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017

21 No additional external fixtures

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

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

22 Roof terraces hours of use

The roof terraces hereby approved on the commercial premises shall be used by the occupiers of the building only and shall not be used outside the hours of 08:00 and 20:00 Monday to Friday and at no time during the weekends or bank holidays.

Reason: To ensure that the amenity of occupiers of surrounding premises is not adversely affected by noise or disturbance, in accordance with the requirements of Policies A1 and A4 of the London Borough of Camden Local Plan 2017.

23 No audible music

No music shall be played on the terrace 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 A1 and A4 of the London Borough of Camden Local Plan 2017.

Building regulations (imposed optional requirements)

24 Water use (building control optional requirements)

The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, with an additional 5 litres/person/day for external water use.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

22. INFORMATIVES

1 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941). 2 This approval does not authorise the use of the public highway. requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 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. 3 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)

	Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.
4	Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
5	You are reminded of the need to provide adequate space for internal and external storage for waste and recyclables. For further information contact Council's Environment Services (Waste) on 020 7974 6914/5 or see the website http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en.
6	The Health and Safety Executive (HSE) states that work-related stress and poor mental health should be treated with the same significance as risks of poor physical health and injury. The Council views this as particularly pertinent to the construction industry, a predominantly male environment where the risk of suicide is around 3.5 times higher than men in general. Approximately one-third of construction workers report increased levels of anxiety every day. The Council strongly encourages developers of major construction sites to sign up to one of two construction industry led initiatives, Building Mental Health (Building Mental Health - Home) or Mates in Mind (Home Page), train a proportionate number of staff in Mental Health First Aid, and offer drop-in sessions/or spaces at construction sites for workers. The Council will support the construction industry working in Camden with an offer of free Mental Health First Aid and other training, and information on local resources and signposting to sources of help.
7	This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, www.camden.gov.uk/planning or the Camden Contact Centre on Tel: 020 7974 4444 or email env.devcon@camden.gov.uk).
8	Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near

neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.

9 Biodiversity Net Gain (BNG) Informative (1/3):

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

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

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

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

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

10 Biodiversity Net Gain (BNG) Informative (2/3):

+ Summary of transitional arrangements and exemptions for biodiversity gain condition

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

- 1. The planning application was made before 12 February 2024.
- 2. The planning permission is retrospective.
- 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.
- 4. The permission is exempt because of one or more of the reasons below:
- It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.
- It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).
- The application is a Householder Application.
- It is for development of a "Biodiversity Gain Site".

- It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding).
- It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).

11 Biodiversity Net Gain (BNG) Informative (3/3):

+ Irreplaceable habitat:

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

+ The effect of section 73(2D) of the Town & Country Planning Act 1990 If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.

+ Phased development

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

Planning Committee

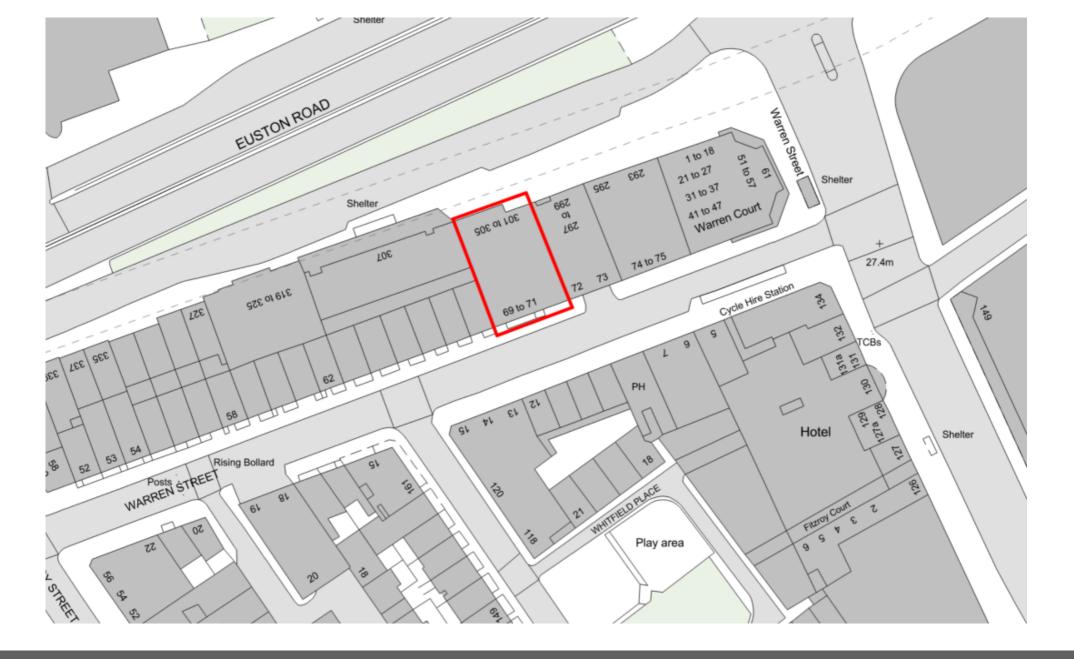
13th November 2025



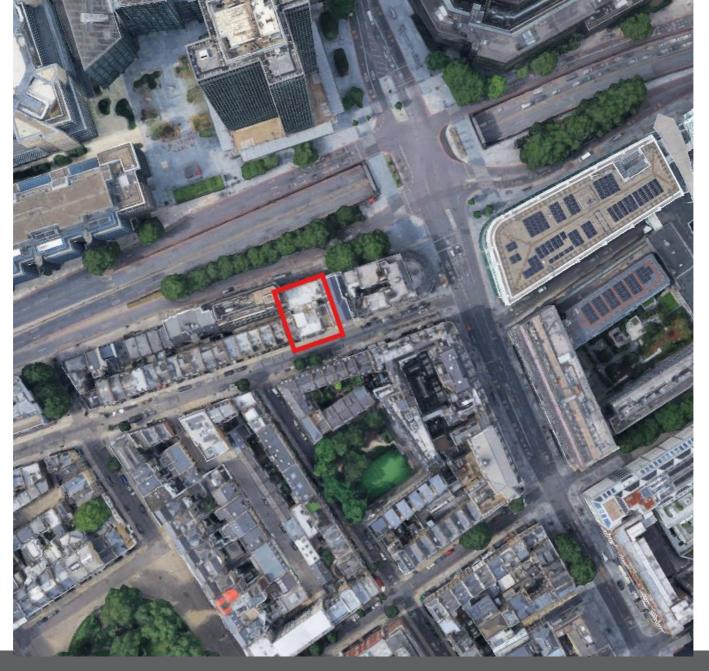
2025/2958/P

69-70 & 71 Warren Street & 301-305 Euston Road London NW1 3AD





3. 2025/2958/P













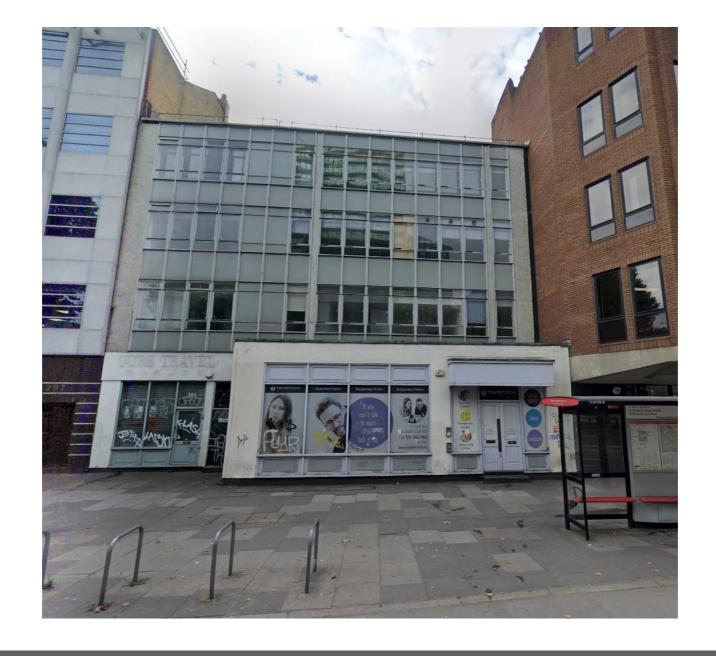




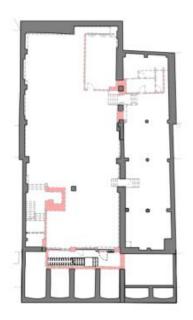




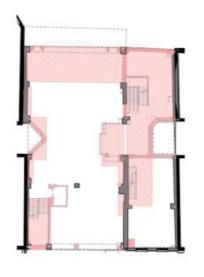


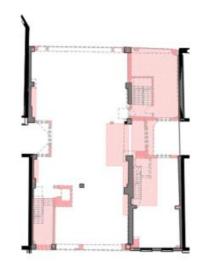


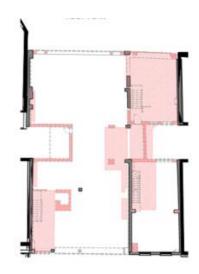










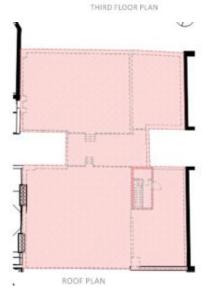


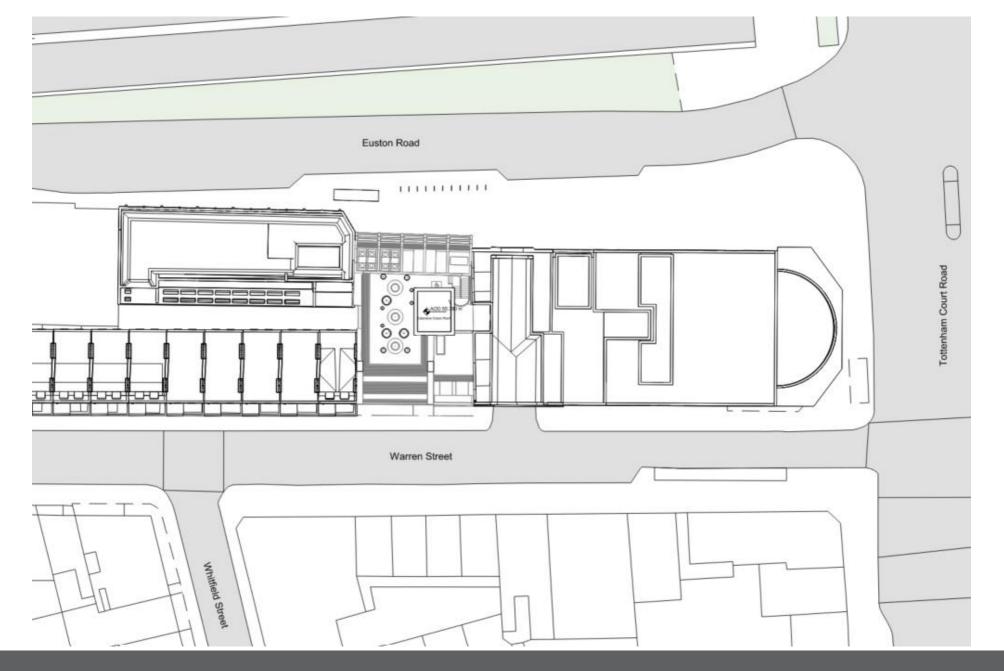
BASEMENT PLAN

GROUND FLOOR PLAN

FIRST FLOOR PLAN

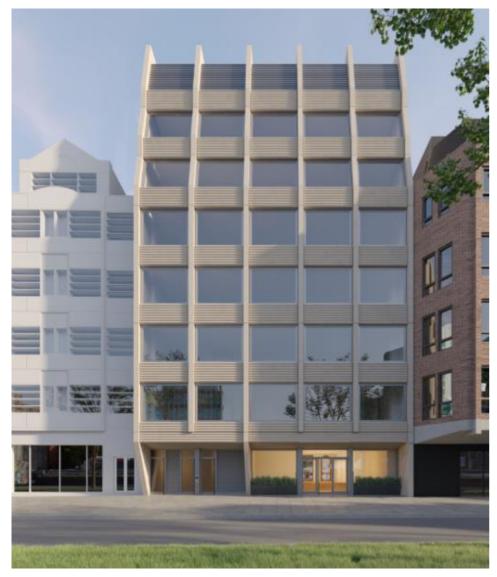
SECOND FLOOR PLAN



















PPC ALUMINIUM LOUVRES

DECORATIVE PRECAST CONCRETE GABLE REVEAL PANELS.

LONDON STOCK OR SIMILAR HAND LAID PERFORATE BRICKWORK

PPC ALUMINIUM RAINSCREEN CLADDING

FLAMED GRANITE OR PORCELAIN TILES.

PRECAST CONCRETE COPINGS

PPC ALUMINIUM LOUVRES / BALUSTRADE

LONDON STOCK OR SIMILAN HAND LAID BRICKWORK

PPC ALUMINIUM FIXED CASEMENT WINDOWS





