

<b>Address:</b>	123 Judd Street London WC1H 9NP		<b>1</b>
<b>Application Number(s):</b>	2025/3810/P	<b>Officer:</b> Ewan Campbell	
<b>Ward:</b>	Bloomsbury		
<b>Date Received:</b>	01/09/2025		
<b>Proposal:</b>	Partial change of use of building from telephone exchange (Sui Generis) to use as a hotel (Class C1) with retention of existing telephone exchange (Sui Generis) at part of basement and ground floor. Proposed extension with green roofs, PV panels and external alterations to the building. Associated public realm works, including to courtyard. Associated highway and access works.		
<b>Background Papers, Supporting Documents and Drawing Numbers:</b>			
<b>Drawing numbers:</b>			
4877-STA-XX-00-DR-A-00100 Site Location Plan 4877-STA-XX-00-DR-A-00101 Site Plan			
Existing General arrangement plans 4877-STA-XX-B1-DR-A-01099 (Rev F) Basement Floor Plan as Existing 4877-STA-XX-00-DR-A-01100 (Rev F) Ground Floor Plan as Existing 4877-STA-XX-01-DR-A-01101 (Rev F) First Floor Plan as Existing 4877-STA-XX-02-DR-A-01102 (Rev F) Second Floor Plan as Existing 4877-STA-XX-03-DR-A-01103 (Rev F) Third Floor Plan as Existing 4877-STA-XX-04-DR-A-01104 (Rev F) Fourth Floor Plan as Existing 4877-STA-XX-05-DR-A-01105 (Rev F) Fifth Floor Plan as Existing 4877-STA-XX-06-DR-A-01106 (Rev F) Roof Plan as Existing			
Existing Elevations 4877-STA-XX-ZZ-DR-A-01121 (Rev A) North Elevation as Existing 4877-STA-XX-ZZ-DR-A-01122 (Rev A) South Elevation as Existing 4877-STA-XX-ZZ-DR-A-01123 (Rev A) East Elevation as Existing 4877-STA-XX-ZZ-DR-A-01124 (Rev A) West Elevation as Existing 4877-STA-XX-ZZ-DR-A-01125 (Rev A) Courtyard Elevation North as Existing 4877-STA-XX-ZZ-DR-A-01126 (Rev A) Courtyard Elevation East as Existing 4877-STA-XX-ZZ-DR-A-01127 (Rev A) Courtyard Elevation South as Existing 4877-STA-XX-ZZ-DR-A-01128 (Rev A) Courtyard Elevation West as Existing			
Existing Sections 4877-STA-XX-ZZ-DR-A-01131 Section 1 as Existing 4877-STA-XX-ZZ-DR-A-01132 Section 2 as Existing 4877-STA-XX-ZZ-DR-A-01133 Section 3 as Existing			

4877-STA-XX-ZZ-DR-A-01134 Section 4 as Existing  
4877-STA-XX-ZZ-DR-A-01135 Section 5 as Existing

#### Demolition General arrangement plans

4877-STA-XX-B1-DR-A-02099 (Rev A) Basement Floor Plan - Demolition  
4877-STA-XX-00-DR-A-02100 (Rev A) Ground Floor Plan - Demolition  
4877-STA-XX-01-DR-A-02101 (Rev A) First Floor Plan - Demolition  
4877-STA-XX-02-DR-A-02102 (Rev A) Second Floor Plan - Demolition  
4877-STA-XX-03-DR-A-02103 (Rev A) Third Floor Plan - Demolition  
4877-STA-XX-04-DR-A-02104 (Rev A) Fourth Floor Plan - Demolition  
4877-STA-XX-05-DR-A-02105 (Rev A) Fifth Floor Plan - Demolition  
4877-STA-XX-06-DR-A-02106 (Rev A) Sixth Floor Plan - Demolition  
4877-STA-XX-07-DR-A-02107 (Rev A) Roof Plan - Demolition

#### Demolition Elevation Plans

4877-STA-XX-ZZ-DR-A-02201 (Rev A) North Elevation 1 - Demolition as Proposed  
4877-STA-XX-ZZ-DR-A-02202 (Rev A) East Elevation 2 - Demolition as Proposed  
4877-STA-XX-ZZ-DR-A-02203 (Rev A) South Elevation 3 - Demolition as Proposed  
4877-STA-XX-ZZ-DR-A-02204 (Rev A) West Elevation 4 - Demolition as Proposed  
4877-STA-XX-ZZ-DR-A-02205 (Rev A) Courtyard Elevation 5 North - Demolition as Proposed  
4877-STA-XX-ZZ-DR-A-02206 (Rev A) Courtyard Elevation 6 North - Demolition as Proposed  
4877-STA-XX-ZZ-DR-A-02207 (Rev A) Courtyard Elevation 7 North - Demolition as Proposed  
4877-STA-XX-ZZ-DR-A-02208 (Rev A) Courtyard Elevation 8 North - Demolition as Proposed

#### Demolition Sections

4877-STA-XX-ZZ-DR-A-02302 (Rev A) Section 2 - Demolition as Proposed  
4877-STA-XX-ZZ-DR-A-02303 (Rev A) Section 3 - Demolition as Proposed

#### Proposed General arrangement plans

4877-STA-XX-B1-DR-A-07099 (Rev I) Proposed Basement Floor Plan  
4877-STA-XX-00-DR-A-07100 (Rev H) Proposed Ground Floor Plan  
4877-STA-XX-01-DR-A-07101 (Rev H) Proposed First Floor Plan  
4877-STA-XX-02-DR-A-07102 (Rev H) Proposed Second Floor Plan  
4877-STA-XX-03-DR-A-07103 (Rev H) Proposed Third Floor Plan  
4877-STA-XX-04-DR-A-07104 (Rev H) Proposed Fourth Floor Plan  
4877-STA-XX-05-DR-A-07105 (Rev H) Proposed Fifth Floor Plan  
4877-STA-XX-06-DR-A-07106 (Rev H) Proposed Sixth Floor Plan  
4877-STA-XX-07-DR-A-07107 (Rev H) Proposed Roof Plan

#### Proposed Elevations

4877-STA-XX-XX-DR-A-07101 (Rev B) North Elevation 1 - As Proposed  
4877-STA-XX-XX-DR-A-07102 (Rev B) East Elevation 2 - As Proposed  
4877-STA-XX-XX-DR-A-07103 (Rev B) South Elevation 3 - As Proposed  
4877-STA-XX-XX-DR-A-07104 (Rev B) West Elevation 4 - As Proposed  
4877-STA-XX-XX-DR-A-07105 (Rev A) Courtyard Elevation 5 - As Proposed

4877-STA-XX-XX-DR-A-07106 (Rev A) Courtyard Elevation 6 - As Proposed  
4877-STA-XX-XX-DR-A-07107 (Rev A) Courtyard Elevation 7 - As Proposed  
4877-STA-XX-XX-DR-A-07108 (Rev A) Courtyard Elevation 8 - As Proposed

**Proposed Sections**

4877-STA-XX-099L-DR-A-07300 (Rev C) Proposed Section A-A  
4877-STA-XX-099L-DR-A-07301 (Rev A) Proposed Section B-B

**Proposed Bay Studies**

4877-STA-XX-XX-DR-A-20301 (Rev B) Façade Bay Study 01 - As Proposed  
4877-STA-XX-XX-DR-A-20302 (Rev A) Façade Bay Study 02 - As Proposed

**Supporting documents:**

Design and Access Statement, prepared by Stiff + Trevillion including Accessibility Statement, Schedule of Accommodation, Lighting Assessment, Waste Storage and Collection; Employment and Training Strategy, prepared by Dominus; Crime Impact Assessment, prepared by QCIC Security Assured; Economic and Social Value Statement, prepared by GC Insight; Health Impact Assessment, prepared by GC Insight; Hotel Needs Assessment, prepared by Colliers; Statement of Community Involvement, prepared by Kanda; Heritage Statement including photographs and visualisations and Views analysis, prepared by The Townscape Consultancy; Housing Study prepared by Stiff + Trevillion; Landscaping Statement, prepared by Townshend Landscape Architects; Ecology and Bat Survey, prepared by Pell Frischmann; Arboricultural Pre-Development Report, prepared by JF Tree Services; Noise Impact Assessment, prepared by Scotch Partners LLP; Air Quality Assessment, prepared by Pell Frischmann; Daylight and Sunlight Assessment, prepared by GIA; Structural Report, prepared by Elliott Wood; Sustainability Statement, prepared by Carbon. Climate. Certified.; BREEAM pre-assessment, prepared by Carbon. Climate. Certified.; Energy Statement, prepared by Applied Energy; Sustainable Drainage Systems Strategy (P02), prepared by Elliot Wood; Flood Risk Assessment (P02), prepared by Elliot Wood; Transport Assessment, prepared by Pell Frischmann; Travel Plan including a Delivery and Servicing Management Plan, prepared by Pell Frischmann, Revised Sustainability Report 'Revised (572)2449-DD-GR-Sustainability-Statement\_123\_Judd\_Street\_R02', Revised Fire Statement 'Revised R1 Issue 5 - Judd Street - Fire Statement', Revised Construction Management Plan '20250909 - CMP 123 Judd Street Rev 02 [Revised]' and SuDs response to LLFA '2240185-EWP-ZZ-XX-TN-C-0001-P01 - Response to LLFA Comments'

**RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement.**

**Applicant:**

C/O agent

**Agent:**

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## ANALYSIS INFORMATION

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Sui Generis	Telephone Exchange	8,951	329	-8622
C1	Hotel	0	10,634	10,634
<b>Total</b>		<b>8,951</b>	<b>10,963</b>	<b>2,012</b>

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	0	0	0
Car - Disabled accessible	0	1 (secured through a financial contribution)	1
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – long stay	0	+22	+ 22
Cycle – short stay	0	+31	+31

## EXECUTIVE SUMMARY

- i) The site at 123 Judd Street is a five-storey former telephone exchange located within the Bloomsbury Conservation Area, Central Activities Zone (CAZ), and Camden's Knowledge Quarter. It is highly accessible, near King's Cross and Euston stations, and currently underused due to technological changes in telecom infrastructure.
- ii) The proposal is for the extension and conversion of the building into a 240-room hotel (Use Class C1), retaining part of the basement and ground floor for ongoing telephone exchange use. Public realm improvements, landscaping, and sustainable transport measures are included. The scheme also introduces the Camden Hospitality Academy (CHA), a partnership with Hilton and Springboard, offering training and job opportunities for Camden residents, especially those in priority cohorts.

- iii) Whilst the proposal could be argued to conflict with Policy E2 as it would result in the loss of an employment use, the proposed change of use to hotel is considered acceptable in this instance and in compliance with the development plan taking account of the specific circumstances of this case. Firstly, the premises which was purpose designed is not suitable to continue as a telephone exchange across the whole building however part of the basement and ground floor is being retained for this use. The former use provided limited jobs whereas the proposed use provides lots of employment opportunities and benefits for Camden residents including commercial meeting room space, as well as restaurant/bar space which supports the successful function of the CAZ. In this context the proposed use does more to support the strategic objectives of the Local Plan to protect and enhance employment generating uses. The site also does not lend itself well to conversion to residential and there is concern it would provide sub-standard accommodation. This is compounded when there is a mix of uses.
- iv) The hotel use aligns with London Plan Policy E10 and Camden Local Plan Policy E3, supporting tourism and economic growth in a highly accessible location. The retention of the telephone exchange ensures continuity of critical infrastructure.
- v) The hotel will create 109 direct jobs and further indirect employment. The CHA provides meaningful local training and employment, supporting Camden's inclusive growth objectives.
- vi) While Policy H2 seeks housing in mixed-use schemes, on-site provision was found unviable due to design and amenity constraints. A policy-compliant payment in lieu will support off-site affordable housing delivery partly for a proposed scheme at the Fitzrovia Neighbourhood Centre at 39 Tottenham Street.
- vii) The proposal does cause a small level of less than substantial harm to the Bloomsbury Conservation Area due to the height and massing of the extension but is not considered to harm the setting of nearby listed buildings. This harm is outweighed by public benefits including from retaining the building in active employment generating uses and the support package for local employment and training provided by the CHA. The design is also considered a high-quality addition to the area having evolved through consultation and a Design Review Panel.
- viii) The retrofit approach supports Camden's carbon reduction goals. The scheme achieves BREEAM "Excellent", includes green roofs, and meets energy and drainage policy requirements.
- ix) The development is car-free, with 53 cycle spaces and managed servicing. It meets London Plan and Camden transport policies.
- x) Daylight, sunlight, noise, and air quality impacts have been assessed and found acceptable. Biodiversity and ecological impacts are minimal and managed appropriately.
- xi) The proposal delivers significant economic, social, and environmental benefits, complies with the Development Plan as a whole, and supports Camden's strategic objectives. It is recommended that planning permission is granted.

xii) Key Benefits Summary:

- a. Reuse and upgrade of a vacant building in a highly accessible location.
- b. 240 new hotel rooms supporting Camden's visitor economy.
- c. 109 direct jobs and further indirect employment.
- d. Camden Hospitality Academy (CHA) offering training and job access for local residents.
- e. Payment in lieu supporting off-site affordable housing.
- f. High-quality design.
- g. BREEAM "Excellent" rating and sustainable retrofit approach.
- h. Car-free development with strong cycling provision.
- i. Public realm improvements and landscaping.
- j. Compliance with all relevant planning policies.

## OFFICER REPORT

**Reason for Referral to Committee: Development involving the change of use of more than 1,000 sqm of non-residential floorspace (Clause 3(ii)); and subject to the completion of a S106 legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)).**

### 1. SITE AND BACKGROUND

#### *Location*

- 1.1 The site is bounded by Judd Street to the east, Hastings Street to the south, Bidborough Street to the north, and Hamilton House to the west.
- 1.2 123 Judd Street was originally constructed in 1920 for use as a telephone exchange, and rebuilt for the same purpose in the 1950s, following the Second World War. Parts of the building continue to accommodate nationally important infrastructure that is required for the transmission of voice and data communication signals. The remainder is currently vacant.
- 1.3 Primary pedestrian access into the building is via Judd Street, with vehicular access for servicing and deliveries via a roller shutter door along Hastings Street. Between the Building and Hamilton House to the west is a private access route closed off by a large (vehicular) gate on Bidborough Street and a wall with a (pedestrian) door Hastings Street.



*Figure 1 – Streetview of 123 Judd Street*

- 1.4 The site is situated in the Bloomsbury Conservation Area. The building is not listed but is identified as making a positive contribution to the character of this part of the conservation area. The closest listed building is Camden

Town Hall (Grade II), situated 30 metres directly to the northeast of the site. Below is a map showing the nearby heritage assets and the site.

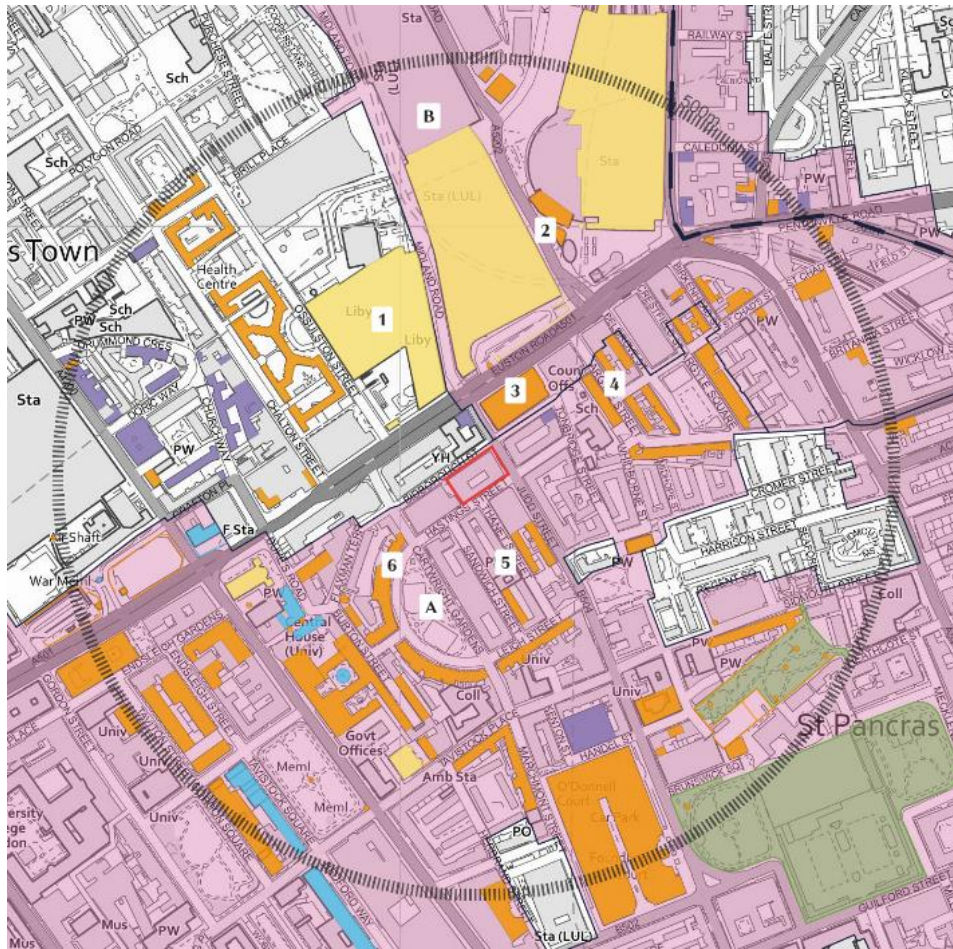


Figure 2 – Map of site and nearby heritage assets

- 1.5 The surrounding area comprises a mix of commercial and residential properties. The properties surrounding the Site are predominantly Victorian and Edwardian red brick mansion blocks which are between 5 and 7 storeys in height. However, there are more recent styles of architecture to the northwest along Bidborough Street (e.g. Bidborough House, UCL) and the ashlar masonry Camden Town Hall to the northeast.
- 1.6 The Site has a Public Transport Accessibility Level (“PTAL”) 6b which is considered ‘excellent’ and is the best possible rating. The site is approximately 100m to the southeast of Kings Cross Station and St Pancras Station. There are also several bus stops serving various routes located nearby on Euston Road.
- 1.7 The site is located in an area of low probability of flooding (Flood Zone 1).



## 2. THE PROPOSAL

- 2.1 The proposal seeks to convert the existing BT Telephone Exchange into a new 'upper-scale' boutique hotel which looks to serve the surrounding Knowledge Quarter and commercial uses as well as providing high class visitor accommodation in the central London area.
- 2.2 The proposal will include the refurbishment to the existing building providing restaurant/bar space as well as a café on the ground floor. The scheme also includes commercial meeting rooms and the establishment of a new Camden Hospitality Academy (CHA) with Hilton Hotels and Springboard which will provide hostility training and opportunities to Camden residents.
- 2.3 The scheme also includes a part two, part three storey roof extension which is designed to extend around the footprint of the building and stepped in places providing design relief. The extension will have a substantial green roof and PV array with an incorporated plant store on the roof.



*Figure 3 – Aerial CGI of proposed development*

- 2.4 The scheme is achieving BREEAM excellent and overall, significantly improves the sustainability credentials of the building
- 2.5 The scheme provides a total of 53 cycle parking spaces catering for both long and short stay.

2.6 As well as the CHA there are a number of employment and training opportunities being secured as part of the development also.

2.7 A review of LBC's adopted Policies Map and other relevant documents confirms that the Site has the following site-specific designations:

- Article 4 Basements
- Article 4 Land Use – Class E to Class C3.
- Bloomsbury Conservation Area
- Central Activities Zone
- Central London Area
- LVMF Protected Vista 6A.1 – Blackheath Point to St Paul's Cathedral
- The Site is also located in the Knowledge Quarter Innovation District

### ***Revisions***

2.8 During the course of the officer assessment, it was noted that there were several errors in the original Daylight/sunlight report which did not match the data provided in the appendices. Therefore, the Council requested amendments to the daylight/sunlight report to accurately reflect the data. Whilst the conclusions matched the raw data in the appendices, which is what the assessment is based on, the Council requested an updated daylight/sunlight report which addressed these errors. The report was updated to ensure that it was consistent, and application was then sent out for further re-consultation.

## **3. RELEVANT HISTORY**

### ***The site***

3.1 There is extensive planning history at the site for minor applications related to plant equipment, intake and extract louvres, and internally illuminated box signs.

### ***The area***

3.2 105 - 121 Judd Street London WC1H 9NE - 2022/1817/P for 'Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services.' **Granted permission subject to s106 agreement on 10/05/2023.**

- 3.3 105 - 121 Judd Street London WC1H 9NE – 2025/1684/P for ‘Variation of conditions 2 (approved drawings) and 20 (fire statement) of planning permission ref. 2022/1817/P dated 10/05/2023 (Erection of roof extensions at third, fourth and fifth floor level with rooftop plant in connection with the continued commercial use of the building (Class E) with associated external alterations to all elevations, public realm improvements; roof terraces at levels three, four and five, provision of cycle parking, waste/recycling storage and other services), namely to: amend design and massing of rooftop plant enclosure and parapets; provide new louvres within existing openings and infill existing windows; provide extended bridge link over lightwell; extend southwest stair core; provide extract flues to roof, and; amend northeast entrance including provision of access ramp.’ **The application was considered by Planning Committee on 13/11/25 who resolved to grant permission subject to completion of a s106 agreement.**
- 3.4 Clifton House 83 - 117 Euston Road London NW1 2BB – 2011/4869/P for ‘Amendment to planning permission granted 16/01/01 (ref. PSX0005003) as amended by planning permission dated 15/01/07 (2006/5316/P) and planning permission dated 23/12/09 (2009/4662/P) for extension to existing offices (Class B1) at 4th - 6th floor levels at the rear and erection of 3 x additional floors for office use, enlarged lift cores at the rear elevation and erection of a glazed canopy over ground floor facade facing Euston Road, erection of two external fire escape staircases to rear and six storey side extension, namely to extend the height of the two external fire escape staircases (Retrospective).’ **Granted permission subject to section 106 agreement on 04/02/2014.**
- 3.5 Clifton House 83 - 117 Euston Road London NW1 2BB – 2010/1840/P for ‘Change of use of first, second, third, fourth, fifth and sixth floors of existing office building (Class B1a) in order to create a hotel (Class C1).’ **Granted subject to section 106 agreement on 28/06/2010**
- 3.6 Fitzrovia Neighbourhood Centre, 39 Tottenham Street, London, W1T 4RX - 2025/4312/P and 2025/4477/L for Change of use of neighbourhood advice centre (Class D1) at ground floor level to a commercial unit (Class E) and conversion of remaining floors (Class C3) to provide three flats at basement, first, second, third and fourth floor level (2 x 1 bed and 1 x 2 bed) together with a mansard roof addition, demolition and rebuild of infill extension between 39 Tottenham Street and 14 Goodge Place, opening up of lightwells, refurbishment of shop frontage and replacement windows to upper levels. **Recommended for approval subject to s106 being agreed.**

## 4. CONSULTATION

### ***Statutory consultees***

#### Historic England

- 4.1 Historic England have been consulted and have the following comments:
- 4.2 Kelvin House at 123 Judd Street, formally known as a telephone exchange, is a 4-storey brick building dating from 1950. It is not listed but is situated within the Bloomsbury Conservation Area and identified as a positive contributor to the Bloomsbury Conservation Area in the Conservation Area Appraisal.
- 4.3 The significance of the conservation area is largely derived from its cohesive urban form, defined by a harmonious scale and rhythm of predominantly Georgian and early Victorian buildings. Buildings are typically three to five storeys in height, creating a human-scaled streetscape that supports both residential and institutional uses.
- 4.4 The principal impact of the proposed extension will be on the character and appearance of this part of Bloomsbury Conservation Area.
- 4.5 The proposal would increase the scale and absolute height of the building, which would impact on the building's character and its relationship with the smaller scale buildings in the conservation area to its south. In Historic England's view, the proposal does not read as an extension due to its size, materiality and composition.
- 4.6 Historic England recognises the contrast in scale between Bloomsbury's historic townscape and the large buildings of Euston Road that already exists in the vicinity of the site. However, there is concern that increasing the size of historic buildings set within the Bloomsbury Conservation Area could bring incremental change to its character and appearance.
- 4.7 Historic England have identified that some harm would be caused to the Bloomsbury Conservation Area by the scale and design of the proposed scheme, but considers it to be less than substantial in the language of the NPPF, and in the lower range of such harm.
- 4.8 The identified harm primarily arises from the form and scale of the proposed three-storey extension, which would be prominently visible in street views.
- 4.9 Reducing the height of the extension is recommended with further elements of being set back could reduce the visual dominance.

*Officer comment: the comments above raises concern particularly over the proposed roof extension. The council asserts that the high quality design and overall scale of the proposed building is appropriate for the overall area and*

*townscape with a full assessment in terms of the design and heritage impacts are discussed in section 8.*

#### Health and Safety Executive

- 4.10 From the information that has been provided for this planning application the HSE assesses that the scheme does not appear to fall under the remit of planning gateway one because the purpose of a 'relevant building' is not met.

#### Transport for London (Crossrail)

- 4.11 TfL Crossrail confirm that the land is outside the limits of land subject to consultation for Crossrail 2 Safeguarding Direction. Therefore no comments were made.

#### Transport for London (London Underground)

- 4.12 TfL London Underground were also consulted and do not wish to comment on the application.

#### Westminster City Council

- 4.13 Westminster City Council have been consulted and responded saying they did not wish to comment on the proposals.

#### ***Non-statutory consultees***

#### Thames Water

- 4.14 No objection subject to conditions being imposed on the planning permission in relation to infrastructure upgrades to cope with demand.

#### Design Review Panel

- 4.15 The Proposed Development has been subject to scrutiny by a Design Review Panel held on 11 July 2025. The Panel welcomed the ambition to provide public access to this historic building, commending the proposed ground floor interventions such as lowered cills and courtyard access. The panel encouraged further permeability, stronger local engagement, and community integration, including alternative accommodation offers such as apprenticeship housing.
- 4.16 Height & Massing – Rooftop massing is broadly acceptable but proportions should be reviewed to avoid an overly corporate feel, retain domestic scale, and better define base–middle–top. Setbacks, simplified forms, and townscape view analysis (including from Midland Road) are recommended.
- 4.17 Ground Floor Activation – Explore increased public permeability, potentially relocating the restaurant to free ground floor space. Lowering floor levels on Bidborough Street could improve access. Encourage active street edges with seating and greening.

- 4.18 Community Benefit – Ensure spaces feel inclusive and accessible to local residents, students, and workers; consider opportunities for independent or community-run businesses and internal spaces for public use.
- 4.19 Architecture & Materiality – Further refine the architectural language to relate to nearby domestic buildings, reconsider window proportions and frame colours, sculpt roof extensions, and provide stronger façade articulation and lighting strategies.
- 4.20 Sustainability – Strong support for building retention. Further develop circular economy principles, operational energy strategy, flexible internal layouts, and a clear wellbeing approach.

### ***Local groups***

#### Bloomsbury CAAC

- 4.21 The Bloomsbury CAAC have been consulted but have not commented on the proposal.

#### Bloomsbury Residents Action Group (BRAG)

- 4.22 BRAG have objected to the proposal. Concerns include:
- No objection to the use of the 123 Judd Street as a hotel.
  - The overall design, increased scale and massing on top of the building with the loss of upper-level setbacks. This will impact on the character of the conservation area.
  - The impact of the additional height on neighbour's amenity including enclosure and daylight/sunlight.
  - Concern over the impact on air quality in the area.

*Officer comments: The design of the roof extension has been assessed in some detail with the Council's Urban Design colleagues as well as going through the Design Review Panel process. Overall the design of the roof extension, is of high quality and therefore remains an acceptable addition to the building in terms of scale and massing.*

*The extension has been designed to mitigate the impacts on amenity as much as possible with removing roof terraces, creating set ins and being designed with daylight/sunlight studies informing design choices. Overall the proposal does not have a harmful impact on amenity.*

*Issues in relation to design, massing and impact on the Conservation area are covered fully in section 8 below and issues in relation to neighbouring amenity covered in section 9. In terms of air quality, the scheme is air quality neutral and therefore does not increase air quality impacts in the surrounding area. A CMP is also secured in order to mitigate any issues within the construction phase. More information is also found in section 12.*

### Camden Cycling Campaign

4.23 Camden Cycling Campaign have commented on the application raising a few concerns including:

- Concern regarding vulnerable road users in relation to HGV movements.
- Section 17 of the CMP describes proposed routes to the site which seems incorrect and amendment is requested.

*Officer comments: this CMP has been assessed by the Council's transport officer but also this is only in draft form with a final CMP being secured via s106 agreement. This will consider both issues raised and ensure that correct routes are used as well as considering the impact on HGV movements on residents. 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*

### **Adjoining occupiers**

4.24 3 sites notices were displayed for the planning application on 12/09/2025 as follows:

- 1 site notice displayed on Bidborough Street
- 1 site notice displayed on Judd Street
- 1 site notice displayed on Hastings Street

4.25 A press notice was displayed in the Camden New Journal on 18/09/2025.

4.26 A re-consultation was carried out following the discovery of errors within the daylight/sunlight report. Whilst the raw numerical data and conclusions were consistent, the assessment/narrative failed to provide information on the impact on Sinclair House. Numerical ranges in the report in relation to Queen Alexandra Mansions were also found to be incorrect.

4.27 Following this 3 additional sites notices were displayed for the planning application on 05/11/2025 as follows:

- 1 site notice displayed on Bidborough Street
- 1 site notice displayed on Judd Street
- 1 site notice displayed on Hastings Street

4.28 Another press notice was displayed in the Camden New Journal on 06/11/2025.

4.29 Objections were received from at least 24 local households including the freeholder of Queen Alexandra Mansions which states it is on behalf of all

owners, leaseholders and residents. The objections received by the Council are on the Council's website. The key issues raised are.

- 4.30 21 of the objections raised concerns about design, including excessive height and bulk, poor architectural quality, and visual intrusion. Objectors felt the proposal was out of keeping with the urban townscape and visual topography
- 4.31 14 of the objections focused on heritage impacts, citing harm to the Bloomsbury Conservation Area, conflict with the Conservation Area Appraisal and Management Strategy, and inappropriate roof extensions.

*Officer comments: The concerns relating to the impact on the Conservation area is noted and, in accordance with Historic England's assessment a low level of less than substantial harm has been identified. However this is considered to be offset by substantial public benefits that the scheme provides.*

*More information is set out in the assessment within section 8 which discusses the design but also the impact on nearby heritage assets however the scheme has been assessed in multiple pre-app meetings as well as heard at the Design Review Panel, who were broadly accepting of the design direction. Since then the design has developed in consultation with the Council's Design team*

- 4.32 17 of the objections related to daylight and sunlight, particularly the loss of light to Queen Alexandra Mansions which is supported by an objection letter from a daylight/sunlight consultant. Concerns were raised about inadequate compliance with BRE guidelines and flaws in the daylight/sunlight report.
- 4.33 13 of the objections cited overlooking and privacy issues, with new upper floors and roof terraces potentially compromising privacy in bedrooms and living rooms.

*Officer comments: Issues in relation to neighbouring amenity are fully discussed within section 9 of the report covering topics of daylight/sunlight including any potential errors, outlook and enclosure as well as overlooking and privacy. The extension has been designed to not include roof terraces.*

*The BRE report sets out the compliance of the proposed development against the relative daylight/sunlight tests. As per the relevant BRE legislation Councils are obliged to take a flexible approach to the results and consider the local character of the area and other mitigating factors that may be present. This also includes the impact for different rooms which are given more or less weight depending on their type.*



- 4.34 16 of the objections addressed noise and disturbance, including concerns about hotel operations, rooftop plant, external terraces, and late-night activity from the Judd Street entrance.

*Officer comments: Issues of noise and disturbance from plant are also covered within amenity section. In relation to hotel operation a hotel operational management plan will be secured via s106 and opening hours of the public facing uses on the ground floor will be conditioned. Again there are no roof terraces being proposed.*

- 4.35 5 of the objections mentioned light pollution from external lighting and uplighting affecting residential windows.

*Officer comments: A lighting strategy has been proposed to ensure that the area is both well lit at night for safety but also protects amenities. This will be secured via condition.*

- 4.36 12 of the objections were related to transport and access, including increased traffic, taxis, and deliveries, conflict with the cycle superhighway, and impacts on pedestrian safety and school routes.

- 4.37 9 of the objections raised concerns about construction management, citing lack of a robust Construction Management Plan, overlapping construction with adjacent sites, and disruption from noise and dust.

*Officer comments: Transport and highways related impacts are discussed within section 12 of this officer report. A CMP including a construction working group is secured as part of this scheme via s106. Further details normally are provided at the post approval stage.*

- 4.38 10 of the objections criticised the consultation process, describing it as inadequate and misleading, with poor public engagement and lack of transparency.

*Officer comments: The Council encourages developers to undertake robust consultation with residents for prospective schemes. It is clear that a consultation event was organised for this which is outlined in the Statement of Community Involvement (SCI) document. This included:*

*The public consultation was carried out in three distinct stages which included in person events, a dedicated website, online surveys, door-knocking, newsletters and social medias. These included:*

- *Early Listening Exercise (December 2024-January 2025) to understand local priorities*
- *A consultation on the emerging proposals (May-June 2025)*
- *A consultation on detailed proposals (July-August 2025)*

- 4.39 4 of the objections highlighted strain on utilities, particularly water pressure concerns raised by Thames Water and increased demand on local infrastructure.

*Officer comments: Thames Water have been consulted and provided their comments above. They raised no objection subject to conditions.*

- 4.40 8 of the objections opposed the proposed hotel use, arguing it was inappropriate for a residential area and expressing preference for housing, student accommodation, or lab space. There was reference to cumulative development pressure, noting that the area is already under strain from other developments and expressing concern about the loss of residential character.

*Officer comments: The principle of a hotel in this location is supported by policy E3 of the Local Plan, but further assessment is discussed in section 7 of the report. Residential uses are an important part of the area's character, but it does contain a mix of uses. It is important to note that the existing building itself is commercial in character. It is noted, regarding the overall impact of other developments in the area, that the cumulative impact of development will be addressed by the CMP to ensure any impacts are mitigated as much as possible.*

- 4.41 3 of the objections raised concerns about mental health and wellbeing, citing noise, loss of light, and disruption as contributing factors.

*Officer comments: Issues contributing to mental health and wellbeing are noted. However, the Council assess these issues have been adequately mitigated.*

## **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](#)

[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](#)

[D8 Public realm](#)

[D11 Safety, security and resilience to emergency](#)

[D12 Fire safety](#)  
[D14 Noise](#)  
[G1 Green infrastructure](#)  
[G5 Urban greening](#)  
[G6 Biodiversity and access to nature](#)  
[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](#)  
[T6.4 Hotel and leisure uses parking](#)  
[T9 Funding transport infrastructure through planning](#)  
[DF1 Delivery of the Plan and Planning Obligations](#)  
[M1 Monitoring](#)

### London Plan Guidance (LPG)

[Accessible London SPG](#)  
[Optimising Site Capacity: A Design-led Approach LPG](#)  
[Housing SPG](#)  
[London View Management Framework SPG](#)  
[Urban greening factor LPG \(February 2023\)](#)  
[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](#)

### ***Local policy and guidance***

#### Camden Local Plan (2017) (CLP)

[Policy G1 Delivery and location of growth](#)  
[Policy H1 Maximising housing supply](#)  
[Policy H2 Maximising the supply of self-contained housing from mixed-use schemes](#)  
[Policy H4 Maximising the supply of affordable housing](#)  
[Policy C1 Health and wellbeing](#)  
[Policy C5 Safety and security](#)  
[Policy C6 Access for all](#)  
[Policy E1 Economic development](#)  
[Policy E2 Employment premises and sites](#)  
[Policy E3 Tourism](#)  
[Policy A1 Managing the impact of development](#)  
[Policy A3 Biodiversity](#)  
[Policy A4 Noise and vibration](#)  
[Policy D1 Design](#)  
[Policy D2 Heritage](#)  
[Policy CC1 Climate change mitigation](#)  
[Policy CC2 Adapting to climate change](#)

[Policy CC3 Water and flooding](#)  
[Policy CC4 Air quality](#)  
[Policy CC5 Waste](#)  
[Policy TC2 Camden's centres and other shopping areas](#)  
[Policy TC4 Town centre uses](#)  
[Policy T1 Prioritising walking, cycling and public transport](#)  
[Policy T2 Parking and car-free development](#)  
[Policy T3 Transport infrastructure](#)  
[Policy T4 Sustainable movement of goods and materials](#)  
[Policy DM1 Delivery and monitoring](#)

### Supplementary Planning Documents and Guidance

#### *Most relevant Camden Planning Guidance (CPGs):*

[Access for All CPG - March 2019](#)  
[Air Quality - January 2021](#)  
[Amenity - January 2021](#)  
[Biodiversity CPG - March 2018](#)  
[Design - January 2021](#)  
[Developer Contribution CPG - March 2019](#)  
[Employment sites and business premises - January 2021](#)  
[Energy efficiency and adaptation - January 2021](#)  
[Housing - January 2021](#)  
[Planning for health and wellbeing - January 2021](#)  
[Town centres and retail - January 2021](#)  
[Transport - January 2021](#)  
[Trees CPG - March 2019](#)  
[Water and flooding CPG - March 2019](#)

#### *Other guidance:*

- 5.1 Bloomsbury Conservation Area appraisal and management strategy (2011)

#### Proposed Submission Draft Camden Local Plan (DCLP)

- 5.2 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.
- 5.3 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.
- 5.4 The Proposed Submission Draft Local Plan (DCLP) 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

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

7	Land use
8	Design and Heritage
9	Impact on Neighbouring Amenity
10	Sustainability and Energy
11	Air Quality
12	Transport
13	Trees, Greening and Biodiversity
14	Water and Flooding
15	Safety and Security
16	Fire Safety
17	Health Impact
18	Contaminated Land
19	Employment and Training Opportunities
20	Refuse and Recycling
21	Community Infrastructure Levy (CIL)
22	Conclusion
23	Recommendation
24	Legal Comments
25	Conditions Planning Permission
26	Informatives Planning Permission

## 7. LAND USE

### ***Loss of commercial use***

- 7.1 Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites in the borough and protect premises or sites suitable for continued business use. However,

Policy E2 goes on to add that the Council will accept the loss of business premises where (A) the site is no longer suitable for its existing business use and (B) the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period.

- 7.2 The existing building was purpose-built as a telephone exchange (sui generis) and has been in continuous use as such since it was built. The building is now currently vacant and has been for some time. The future of the site will continue to include a telephone exchange at lower levels, consolidated to a smaller area of floorspace owing to improved technology. The telephone exchange contained a commercial character with a small amount of people using it as a workplace and therefore the building is considered an employment use. This means that it falls under the requirements of policy E2.
- 7.3 As per points a) and b) due to the technological change, development of telephone exchanges and the associated infrastructure a building of this size is not needed to house telephone exchange equipment and therefore the building is not suitable for the current use. Moreover, re-housing another similar use in this building is not appropriate for the same reasons but the scheme does include the retention of the telephone exchange use within the basement and ground floor.
- 7.4 When proposals involve a loss of employment space policy E2 requires relevant marketing evidence to be provided to ensure there is sufficient demonstration that the existing employment use cannot continue over an appropriate period. In this case there is a slight conflict with the policy as no marketing evidence has been provided. However the aim of policy is to secure employment premises in the borough and ultimately protect jobs. In this case the site is a sui generis use which has ancillary office space but in reality, employs very few people compared to its size. As the use is a telephone exchange this also makes it difficult to market the building as offices or another commercial use for the required two years and means any prospective tenant would have to apply for planning permission to convert the site into a different commercial use. This also would make any marketing information more difficult to demonstrate the employment potential. With the site being vacant for a number of years as well, the council considers that requiring marketing for a site like this would not be appropriate to demonstrate its employment benefits and therefore marketing information is not needed in this instance in relation to policy E2.
- 7.5 As well as this the hotel use (Class C2) is an employment-generating use and therefore contributes to providing jobs that can benefit Camden residents and help support the local economy in a similar way to business use. The use supports the functions of the CAZ providing meeting/function

room facilities for local business as well as a large restaurant, bar and café space on the ground floor which successfully activates this area.

- 7.6 Not only does the hotel use generate more employment than the existing use, the proposal contains an enhanced employment and training package, including the establishment of a Camden Hospitality Academy (CHA). The CHA will help generate meaningful employment opportunities in the sector and prioritise Camden residents and therefore provide significant public benefit for residents of the borough. The use of the site by CHA will be secured via a s106 agreement as will a Camden Hospitality Academy Operating Strategy to ensure collaboration with the Council's Inclusive Economy team and delivery.
- 7.7 Overall whilst the submission does not include marketing evidence, due to the nature of the telephone exchange use and its continued retention on site, the vacancy of the building, the proposals support for the functions of the CAZ and the significant provision of employment and training opportunities, the proposal complies with the principles of policy E2 of the 2017 Local Plan.

#### ***Compensation for loss of employment space***

- 7.8 As per paragraph 54 of the Employment Sites and Business Premises CPG, in these circumstances, where the loss of employment use can be expected to result in a reduction of potential job opportunities for Camden residents, the Council will seek a contribution from developers towards measures which create or promote opportunities for employment or training of local people. A contribution will only be sought in cases where the net loss of employment space is 500 sqm (GIA) or more. This contribution will be held by the Council and used to support activities that create or promote opportunities for employment or training, which could include providing affordable employment space in the borough.
- 7.9 The calculation below is set out in paragraph 60 of the Employment Sites and Business Premises CPG which calculates the amount of jobs based on floor area however the site currently is vacant and even before contained little job activity on site. The submission has calculated the existing full time jobs on site, which are a more accurate reflection of the amount of jobs the site held rather than using floor area to base this calculation on. Therefore these figures are accepted.
- 7.10 Net jobs lost (FT jobs expected in employment use minus FT jobs in new (hotel) use):  $168 - 109$  (from application form) = 59 FT jobs.
- 7.11 Full time jobs lost  $59 \times 21\% = 12$  [% of Camden residents who work in Camden]  $12 \times \text{£}3,995$  [cost to provide training per employee] = £47,940

- 7.12 The contribution amount (£47,940) for the loss of employment space will be secured by means of the S.106 agreement if planning permission is granted.

***Preferred residential use***

- 7.13 Policy H1 (a) and (d) regard housing as the priority land use of the Local Plan and make housing the top priority when considering the future of unused and underused land and buildings. While Policy H1 makes housing the priority for land use when considering the future of unused and underused land and buildings, it is recognised that there are other development plan policies that support hotel use in this location. This includes London Plan policies E10, SD4 and SD5, as well as Local Plan Policy E3 which support hotels within the CAZ. The site is not identified for housing in the Local Development Plan. It is recognised that Policy H1 is worded in such a way as to require consideration of housing for the future of unused buildings but does not prevent applications being submitted for other uses, and the Council would not have a strong policy basis for refusing an application at this site in the hope of an unproven alternative use for housing. Further assessment of providing housing on site is discussed in the relevant section below.

***Preferred hotel use***

- 7.14 The proposed hotel is a boutique hotel described as 'upper scale' which will provide 240 rooms representing a large hotel. The ancillary facilities include hotel lobby, restaurant, bar, café, fitness centre and meeting space facilities. It is understood this will be a contemporary, high quality, design led proposal which can support the Knowledge Quarter and wider visitor economy.
- 7.15 London Plan policy E10 recognises the importance of tourism to London's economy. It states that London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital. The London Plan seeks to deliver 58,000 visitor bedrooms across London by 2041, and the GLA projects that 1,595 net rooms will be required in Camden.
- 7.16 In terms of new hotels and visitor accommodation, Policy E3 of the Camden Local Plan recognises the importance of the visitor economy in Camden. It states that the Council will support tourism development and visitor accommodation. New, large-scale tourism development and visitor accommodation are expected in Central London. This can include serviced apartments that offer hotel-like amenities and services, but with more space and privacy like a traditional apartment
- 7.17 Policy E3 recognises the importance of the visitor economy in Camden and supports tourism development and visitor accommodation. It refers to the Central London Area as a town centre where larger scale visitor



accommodation is allowable and where hotels more than 1000sqm should be located.

7.18 Policy TC3 sets out the Council's position on the mix and balance of uses within Camden's centres and refers to hotels as being an example of an appropriate town centre use. Policy E3 states that all tourism and visitor accommodation must:

f. be easily reached by public transport;

g. provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;

h. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and

i. not lead to the loss of permanent residential accommodation.

7.19 With regards to f), the site has a PTAL rating of 6b, which is the highest PTAL rating possible reflecting how easily it is reached by public transport. As well as this, a Hotel Management Plan, would be secured via section 106 agreement to ensure residential amenity in the area is protected. The character of the area is that of a mix of uses, with residential, retail, public houses, offices and cafés/restaurants all within close proximity to the site. The proposal includes sufficient mitigation measures in terms of amenity of those living nearby and this is discussed fully in the amenity section (section 9) of the report. In relation to point i) there would be no loss of permanent residential accommodation as none is contained on the site presently; rather social rented accommodation would be brought forward as a result of the development on another site (refer to 'mixed use policy' section below). In terms of the set down and drop off (g) this will be discussed in the transport section below. It is therefore considered the proposals would accord with the wider aims and objectives of Policy E3 and would be a suitable location for a hotel use.

7.20 In terms of the proposed hotel it will have a GIA of 10,634sqm (329sqm is the retained telephone exchange use) and provide 241 bedrooms. A hotel of this size would be acceptable in this location within the Central London Area and would bring significant benefits in terms of attracting footfall, supporting local businesses in the service sector, and maintaining a level of vibrancy, particularly outside of office hours. The hotel use includes a ground floor restaurant/bar which is open to the public therefore enriching the character of this part of the Central London Area which is presently dominated by the 'dead frontage' of the existing telephone exchange and adding to the vibrancy of the existing offer of retail shops and services this location.

7.21 The proposed use would also bring new jobs to the area with an employment and training benefits package secured as explained above and further in section 19.

7.22 Overall, the provision of hotel use at the site is acceptable.

***Mixed use policy***

7.23 Policy H2 promotes the inclusion of self-contained homes as part of a mix of uses where non-residential development is proposed. It secures this by requiring development that involves additional floorspace of more than 200sqm (GIA) in town centres to provide 50% of all additional floorspace as self-contained housing. Policy H2 sets out a list of criteria (points a-e) to determine whether self-contained housing is required as part of a mix of uses in a development. These are:

*a. character of the development the site and 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 section in the Hatton Garden area;*

*d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and*

*e. whether the development is publicly funded or serves a public purpose.*

7.24 In light of points a, b and d, the character of the area contains residential and commercial uses alongside each other. The site has potential to accommodate a mix of uses given the potential for floorspace uplift as well as its Central London, accessible location. Furthermore, its location results in four frontages providing scope for multiple entrances serving separate uses. The site is not within the Hatton Garden jewellery area, nor would the development be publicly funded or serve a public purpose and therefore points c and e are not relevant to this application.

7.25 In light of the above, the development is required to provide housing as part of proposals. Once it has been established if housing should be provided as part of a development, the consideration is whether this should be on site, off site or a payment in lieu. The policy goes on to set out a number of criteria that the Council will take into consideration to determine if the housing should be provided on site, and the most appropriate mix of housing and other uses. In this instance, on-site provision has not been possible largely to do with the scheme involving the refurbishment of the existing building and challenges involving the separation of uses providing quality standard of accommodation.

7.26 An onsite housing study supports the application and details the difficulties with accommodating a mix of uses within this building. Providing residential accommodation in a building that needs the relevant circulation space but also has a significantly deep floorplate means that the space to provide housing becomes limited, very difficult to provide and ultimately undermined in terms of quality. During pre-app meetings officers also looked into the possibility of using the ‘slot’ in between the site and Hamilton House which is located directly adjacent to the west of Bidborough Street. The image below demonstrates residential space being placed within this space which would ultimately lead to poor quality units.

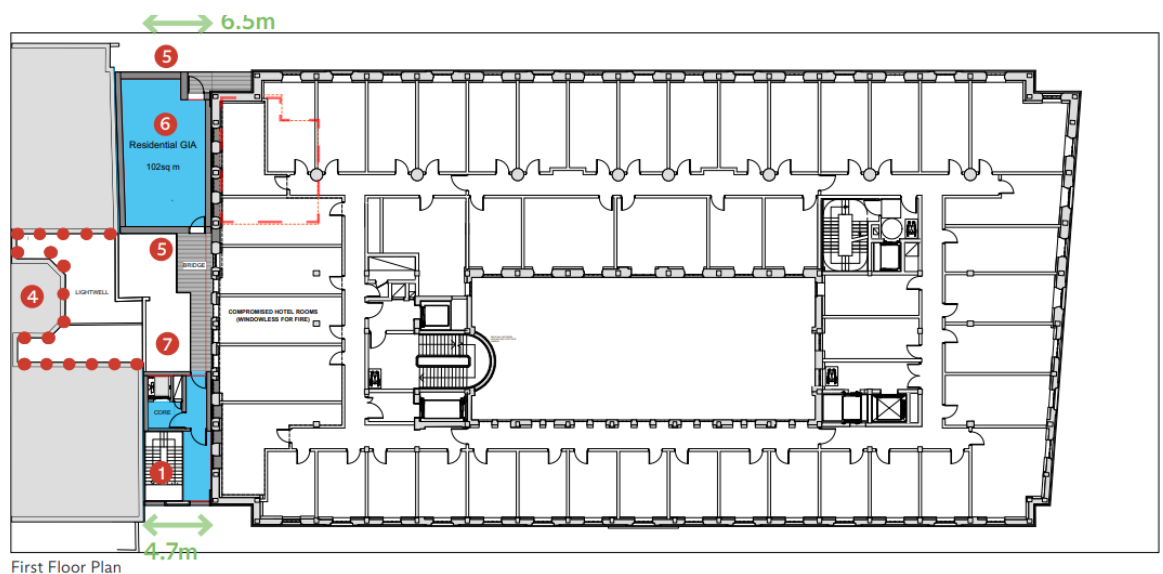


Figure 4 – Exert from the residential study

7.27 The Council also expects developer to seek alternative sites to secure the delivery of affordable housing. As per policy H4 of the 2017 Local Plan, the Council will expect the planning obligation to ensure delivery of the affordable housing by specifying the anticipated delivery site (or sites). Given the competition for sites within Camden, this also remains difficult. In the context of the relatively low affordable housing being secured anyway securing offsite affordable housing as part of this scheme remains particularly difficult

7.28 Overall the Council accepts that providing both uses would be difficult undermining the comprehensive and quality redevelopment of the building to a Hotel use and provide substandard homes on site and the provision of policy compliant level of affordable housing on a different site in Camden. Therefore a payment in lieu is accepted.

7.29 Policy H4 seeks to maximise the provision of affordable housing. A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes starting at 2%

for one home and increasing by 2% for each home added to capacity. Capacity for one additional home is defined within the Local Plan as the creation of 100m<sup>2</sup> of additional residential floorspace (GIA). In assessing capacity, additional residential floorspace is rounded to the nearest 100m<sup>2</sup> (GIA). Where developments have capacity for fewer than 10 additional dwellings (or 1000sqm), the Council will accept a payment-in-lieu of affordable housing.

- 7.30 Based on the uplift in floorspace of 2,012sqm, and in accordance with policy H4, the development would be expected to provide 1,006sqm of housing which would equate to 10 additional homes and an affordable housing target of 20%. The calculation for the payment is listed below:

$$1006 \times 20\% = 201$$

$$201 \times 5000 = \text{£}1,005,000$$

39 Tottenham Street, London, W1T 4RX

- 7.31 Whilst it was not possible to identify a donor site for the developer to bring forward housing, an affordable housing scheme has been identified as a recipient of the payment in lieu.
- 7.32 The site at 39 Tottenham Street currently provides the headquarters for the Fitzrovia Neighbourhood Trust and residential accommodation on the upper floors which are vacant as the building is in disrepair. The site benefits from a permission to refurbish and add additional accommodation which has currently lapsed. However a new application has been submitted in conjunction to this proposal and is currently being assessed to provide three affordable homes (Refs: 2025/4312/P and 2025/4477/L). This has been assessed by the Council and has been recommended approval subject to s106 agreement being signed.
- 7.33 It is important to note that whilst there is an extant permission, the scheme has failed to deliver due to funding issues which has meant the building has fallen further into disrepair and remains in poor condition. Using the PiL in order to unlock this site, deliver affordable housing and repair the listed building represents significant public benefit as part of this proposal.
- 7.34 As part of the payment in lieu being secured, an amount will be deployed to this affordable housing scheme on Tottenham Street and will directly contribute to the delivery of three affordable homes with any remaining contributing to the Council's affordable housing projects across the borough. The applicant has agreed that 50% of the payment would be made on signing the S106 and 50% on implementation which represents the commitment to delivery of the scheme. This will be secured within the wording of the s106 and helps fund affordable housing delivery within close proximity of the proposed development. Flexibility will be added for the

funding to be spent elsewhere in case for any reason the identified scheme was not progressed

## **8. DESIGN AND HERITAGE**

### ***Legislative Background***

- 8.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 8.2 The effect of this section of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of Listed Buildings and their settings. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 16).
- 8.3 The duties imposed by the Listed Buildings Act are in addition to the duty imposed by section 38(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.
- 8.4 The NPPF requires its own exercise to be undertaken as set out in chapter 16 (Conserving and enhancing the historic environment). Paragraphs 207-216 require consideration as to the impact of a proposed development on the significance of both designated heritage assets and non-designated heritage assets, including an assessment and identification of any harm/the degree of harm. Paragraph 215 states:
- 8.5 *'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.'*

### ***Historic development and surrounding townscape***

- 8.6 The site is located within Sub Area 13 of the Bloomsbury Conservation Area, on the west side of the northern end of Judd Street. The site has a southern frontage on to Hastings Street, with a northern frontage on to Bidborough Street. To the west, the site is adjacent to Hamilton House, although the buildings are not connected.

- 8.7 The existing building on site ranges between three and six storeys, with the highest points as plant rooms on the roof. Within the centre of the building is a yard area, accessed through an undercroft from Hastings Street. The building is not listed but is recognised as a positive contributor. The building is described as an interwar building built in a 'austere brown brick with restrained stone decoration including a rusticated base'. The building is large for the Conservation Area but has a strong architecture. The building is 61-64m long, 33m wide and up to 26-27m tall. It has a stepped character, with open 'birds-mouth' junctions at the corners and expressed 'shoulders' at the east and western ends. Floors ground to 2nd are consistent, before stepping in at 3rd floor to form a U-shape around the courtyard, stepping in again at 4th floor with a pair of plant rooms on the east and western ends at 5th floor.
- 8.8 The surrounding pavement has a slight slope, being lower than the internal floor level in all areas except on the southwestern parts. This results in an existing ground floor that has a poor relation with the street, including at the main entrance on Judd Street which is 1.2m different in height. The entrance includes a ramp and set of steps, which mitigate some of the level difference, also causing an obstruction to the pavement. Further internal steps complete the change in level.
- 8.9 The existing building on site was constructed in the 1950s as a telephone exchange. It has a relatively utilitarian character, with a rusticated stone base, brown brick façade and restrained stone decoration. Windows are large, vertical orientated openings, stacked vertically across floors. The windows have stone surrounds, typically with a narrow profile, except on the 1st floor where alternating windows have a more elaborate rusticated surround. The tops of façade walling are capped with a deep stone cornice. The building has a relatively unfriendly appearance, caused partially through the height of ground floor windows, limited entrances, and the brown - red brickwork alongside the apparent lack of maintenance seen through staining and a tarnished presence.
- 8.10 The surrounding streets are characterised through a mix of north-south thoroughfares, with quieter east-west streets that serve local pedestrians. This difference is expressed in the street widths, with Judd Street being the widest at approximately 18m, compared to east-west streets at 15m. To the south, the large street trees extend over pavement and carriageway, reducing in number and size to the north. Pavements are typically generous, with lightwells or furniture in front of buildings.
- 8.11 The existing surrounding buildings are mansion blocks, typically 5-8 storeys, with more residential uses to the south and east of the site, and commercial uses to the north and west. Buildings have many entrances, often with residential entrances to upper floor homes and separately accessed

commercial uses at ground floor. A predominance of layered red brick in a deep construction is often accented with stonework and a defined base. Roofscapes are broken, with dormer windows, chimneys or layers of the façade terminating in different planes. Corners tend to be celebrated, expressed with taller parts and decoration or with entrances positioned on chamfers.

- 8.12 Important considerations will include the building lines, roof lines and bay rhythm of adjacent properties. Plot widths are also particularly important. In the past, these have often been amalgamated into larger plots, damaging the 'urban grain' and character of the Area. Therefore, extensions should preserve the visual distinction of existing plot widths and, where possible, reinstate some sense of the visual distinction of lost plot widths.

### ***Assessment of proposals***

#### **Form and massing**

- 8.13 The proposal retains the existing building footprint at ground floor level, however removes the existing ramped access which will deliver a widening of the pavement by 2m to a total of 5m.
- 8.14 The proposed development retains the lower three floors (ground to second) as existing, infills parts of the third floor, remodels the fourth and fifth floors and adds a new sixth floor. This results in increases to the height of the building from 26-27m to 29-30m above street level, with lift over-runs projecting a further 1m.
- 8.15 At third floor on the south, the existing gap between the western and eastern ends is infilled with a frontage that matches the line of the existing. On the northern side, the same approach is employed which creates a consistent middle to the building. On the fourth and fifth floors, a new façade incorporates the existing building features of east and western wings and 'birds-mouth' corners. On the southern elevation this is only over a single (fourth) floor, maintaining the character of lower massing to this side. On the northern elevation, the massing steps inwards in the centre to reinforce the two end wings and achieve a massing that changes projection across its length, akin to buildings found nearby. The eastern and western ends also contain stepped elevations to give a broken parapet line and more openness to the top when viewed from street level. The proportions of the façade parts follow from the existing building below and retain the rhythm of existing window openings. The new sixth floor is U-shaped in plan, following the form of the building beneath. On its inner line, the façade follows the walls of the courtyard whilst its outer edges are inset from the floor beneath. Three lift overruns project slightly above this. Below figure 5 shows the proposed extension from Judd Street:



*Figure 5 – image of proposed extension and site from Judd Street*

- 8.16 The plant accommodation at sixth floor is a mix of internal and external space, all of which is integrated into the building form and architectural façade language.

#### Street frontage

- 8.17 The proposal has sought to improve the relationship with the street through alterations to the ground floor. The removal of the external ramp on Judd Street allows the main entrance to better engage with the street and improves inclusivity by allowing wheelchairs and pushchairs to enter in the same way as those that are non-disabled. The level difference is instead dealt with internally, through stairs and a platform lift, providing an inclusive access.
- 8.18 The existing shutters to the undercroft on Hastings Street are to be replaced with open gates, with the access proposed as an arrivals route. This will bring activity to this street and allow public views into the courtyard beyond. Elsewhere on the ground floor, window cills have been lowered by 0.8m. This brings the window into the viewing height of a pedestrian on the street, giving better visibility into the building from the street, as well as the benefits from passive overlooking outwards to support a safer street environment. On the southern façade, on Hastings Street, a large opening has been formed from two existing window openings which will be glazed and contain a publicly accessible café. Whilst it is acknowledged this slightly unbalances



the symmetry of the façade, the increased glazing and activity will enhance the streetscape and is therefore supported.

- 8.19 Outward facing uses have been prioritised for street facing elevations, with the reception in the south east, meeting and training facilities in the south-west and the main café / restaurant in the north-east. The kitchen is located at the western end of the northern. All of these uses will bring more activation to the ground floor.
- 8.20 At night, discrete lighting fixed to the building exterior will help to bring illumination to surrounding street and final details of a lighting strategy will be secured via condition.

#### Design and materials

- 8.21 The proposal replaces some elements and includes new parts, all that use materials and details referencing those found locally, whilst presenting a contemporary appearance.
- 8.22 Within the lower floors of the building, the primary changes are within the replacement fenestration. The existing stone surrounds are retained to existing windows. The new windows are sympathetic to the existing frames and those found locally, with white frames and glazing bars. They will be upgraded in performance compared to the current windows, with improved thermal, acoustic performance and integrated ventilation included discretely in the head. New windows openings in the lower floors are proposed to match. Existing stonework and brickwork is to be cleaned and repaired where necessary.
- 8.23 In the new upper floors, the language has a contemporary appearance whilst referencing traditional detailing and follows the window rhythm of the existing building. The materials are a simple palette of light coloured stonework, creamy white bricks and lightly coloured windows. The stonework is formed in a series of columns and beams, including new cornices, pediments and the surrounds of new windows. These project forward and are made up of individual ashlar sections, jointed together so that the façade presents as a stacked assemblage, akin to the stonework in the existing building below. The balance of solid stone and brickwork to openings for windows has an equivalence with the existing building and context. The new horizontal stonework separates the windows, defining the storey height and caps the building. The depth of this and subtle projection at the edges emulates details of the existing cornice parapet. The creamy white brickwork is used in storey height panels between the stone. The windows include stone surrounds with slim metal frames and a single transom and mullion, so they appear simple and complimentary to the existing window frames. The application has committed to high quality details and materials through bay studies within the submission and this will

be controlled through pre-commencement conditions to be assessed post approval.

#### Strategic and local views

- 8.24 In accordance with Policy D1 m). The Council will require that development preserves strategic and local views
- 8.25 The site is in the background of LVMF view 6.1, from Blackheath Point to St Paul's Cathedral. At the location of the site, the view could be affected by projections of above +53-54m AOD. The top of the main body of the proposed is +50.985, with lift overruns at +52.185 and therefore no impact on the view is anticipated.
- 8.26 The proposed heights will be visible from the local streets, and the impact of these changes has been assessed within the application. With the existing street orientation, these are broadly from the north, south, east and west.
- 8.27 From the north and looking south, views from Midland Road are between two Grade I listed structures of the British Library and St Pancras former Midland Hotel. The proposal will be visible, however is largely screened by the existing extension on the northern side of Bidborough Street. The visible parts of the proposal would be seen as a contemporary yet contextual addition to the view. A second view from the north, also within the Kings Cross Conservation Area views south down Judd St from Euston Road. The light colour and articulated roof form present a restrained and background appearance to the proposal that relates to the existing building whilst remaining as a subsidiary to it. Closer views also reinforce this reading, with the stepped profile and open corners having a clear association with those features in the retained parts of the building below.
- 8.28 From the east, views have been provided from Tonbridge Street. The visibility would be obscured by large trees, however the scale would be appropriate with the stepped form helping to manage this on the pavement edge.
- 8.29 From the west, the increase in height is apparent, however the set-backs and broken massing give an appropriate form to the proposal as an extension to the building below. The light colours clearly distinguish it as a top to the building.
- 8.30 From the south, looking north along Thanet Street or Judd Street give views of the proposed extension. From both streets, there is a clear increase in scale although much of the form will be obscured by street trees in longer views. In closer views, the proposal introduces a clearly ordered and well designed top to the building, replacing the existing functional yet haphazard

form from fourth floor and above. As in other viewpoints, the use of a light colour helps distinguish the top from the existing darker brickwork.

- 8.31 In summary, the proposal has been considered from an extensive range of local views. In all of the views the proposal provides an attractive and appropriate addition to the building that interprets the language of the existing and is reflective of the context.

#### Re-use and adaption

- 8.32 The proposal retains much of the existing fabric. Where areas of the façade at upper levels are to be removed to alter the building form, it is anticipated that these can be re-used in other areas of the development where required.
- 8.33 To improve energy performance, external walls are proposed to be internally insulated which improves the U-value of the walls whilst maintaining the external appearance.
- 8.34 The design of the development retains reasonable depth of floorplates to all floors, giving opportunity for the building to be repurposed for an alternative use in future.

#### Impact on heritage assets

- 8.35 As set out above, 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.
- 8.36 The site is located within the Bloomsbury Conservation area and directly opposite the Kings Cross/ St Pancras Conservation area and Grade II listed Camden Town Hall. The site is also along Hastings Street from the Grade II listed Nat West Halls of Residence on Cartwright Gardens and north of 87-103 Judd Street which are also Grade II listed. Apart from Bloomsbury Conservation area, which is discussed below, the heritage assets within proximity to the site are not harmed, in relation to both setting and special character, by the proposed development. Below is heritage map showing the location of the heritage assets including conservation areas for clarity:

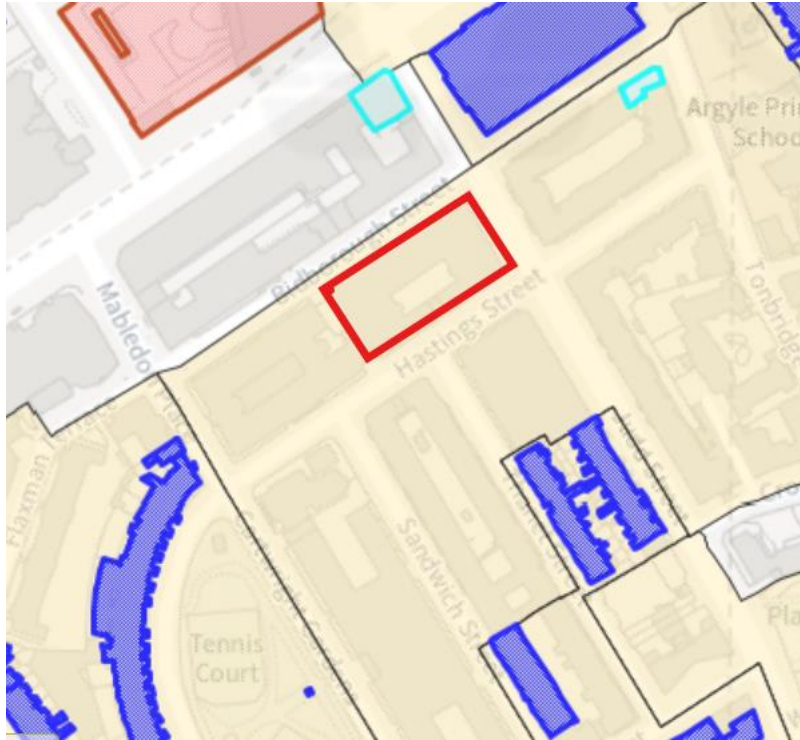


Figure 6 – Map of site and designated heritage assets

- 8.37 In terms of the listed buildings, the assessment, in this instance is whether the proposed development would impact the setting of the listed buildings. The listed buildings on Judd Street would not be harmed due to the distance away, the level of extension being proposed and the presence of the existing buildings in between the site and these listed buildings. This reasoning also is the same for the buildings on Cartwright Gardens.
- 8.38 With Camden Town Hall, which is located on the other side of Judd Street, the building is already set within the context of larger buildings surrounding it, especially on Judd Street. The increase in height of two storeys with a setback third storey and its associated massing would not change this relationship just continue it. The buildings are also set away from each other diagonally which means there are few instances where both buildings are read within the same context and impacting each other's setting. Overall the proposal does not harm the setting or special significance of the Camden Town Hall and is therefore acceptable in accordance with policy D2 of the Local Plan.
- 8.39 The impact on the setting of Kings Cross/St Pancras Conservation area is negligible due to the presence of similarly scaled buildings and the overall high quality design.

*Bloomsbury Conservation Area – Less than substantial harm*

- 8.40 The Bloomsbury conservation area is noted for its formally planned arrangement of streets and the contrasting leafy squares. The significance

of the Conservation Area derives from its cohesive urban form, defined by a harmonious scale and rhythm of predominantly Georgian and early Victorian buildings containing grid of streets enclosed by mainly three and five storey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points.

- 8.41 As the assessment above has demonstrated the design is of high quality, using a sympathetic material palette and responding to the strong architecture of the existing building. However, the proposed height and massing at roof level in this location directly next to buildings of smaller scale and finer grain will result in a more uncomfortable relationship between the buildings south of the site and Bloomsbury's historic townscape. What compounds the issue is the expressive nature of the fenestration at roof level and large scale of the windows which appears at odds with hierarchy of detailing in the surrounding details. This can be seen within views from Judd Street facing into the conservation area where the additional height backdrops the finer scale and smaller buildings adjacent but also within the Conservation area along Bidborough Street looking west. Because of this increase in height overall massing at this point, with the different fenestration pattern, the urban grain and scale in this part of the conservation area will be impacted and altered contributing to low level of less than substantial harm.
- 8.42 The Council has worked through a robust design process in which the design has developed through various iterations. The acceptance of height and massing in this location provides the opportunity for a high-quality designed extension to be delivered, and has meant that in terms of fenestration detailing and materials, it has carefully responded to the building itself. Whilst this has meant that the difference in scale of the fenestration details including windows, compared with the surrounding area has been slightly exacerbated, it means the design provides a better response to the building itself, which also contains larger scale fenestration details as well as a different style of architecture.
- 8.43 This has been mitigated as much as possible through ensuring high quality design, location of massing and use of materials which will be secured via condition.
- 8.44 Considerable weight and importance should be given to that harm, and it should be outweighed in the balance by considerable public benefits.

*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.*

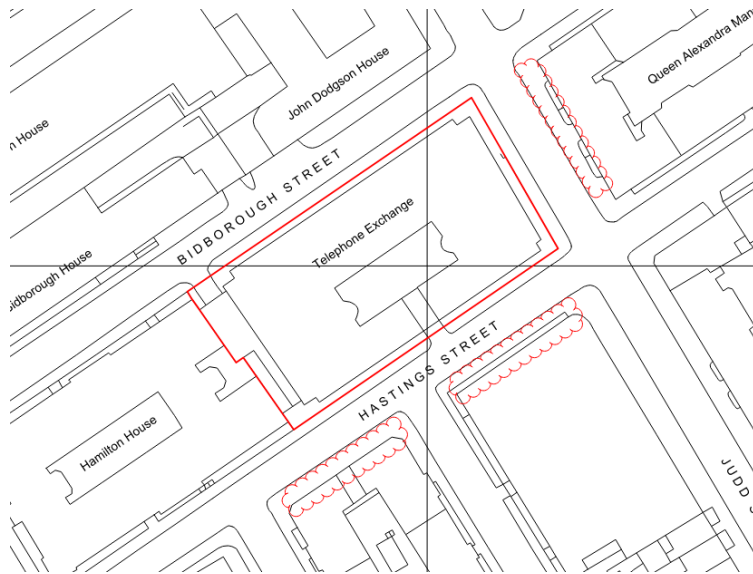
- 8.45 Whilst the Council does identify a low level of less than substantial harm, the scheme provides numerous public benefits - including the high quality design of the extension which does contribute to outweighing the harm (along with the other public benefits which outweigh this harm and therefore the Council is satisfied that the impact on heritage assets, on balance is acceptable.
- 8.46 Overall the proposal is acceptable in accordance with policies D1 and D2 of the 2017 Local Plan.

## **9. IMPACT ON NEIGHBOURING AMENITY**

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

### ***Outlook and sense of enclosure***

- 9.2 The building is large and fairly uniform in design. It sits on a spacious plot and is close to other large buildings in Bloomsbury. Even so, along with its neighbour on Bidborough Street, it is still one of the largest buildings in the area. The proposal includes the removal of the upper floors of the building which are smaller in scale and adding extra floors including partially infilling the gap along Hastings Street. This would raise the building's maximum height by about 9 metres, with some parts going up by one, two or sometimes three storeys.
- 9.3 Considering the urban grain and layout of the surrounding buildings and uses the extension will only really impact the sensitive, residential uses facing directly towards 123 Judd Street along Judd Street and Hastings Street. Even properties that are close to the site along Thanet Street and Hastings Street on the other side of Judd Street, have very much an indirect impact and oblique view from their properties. Therefore the impact they experience because of the roof extension is very small and therefore acceptable. The properties that experience the most impact, as stated above, are highlighted in red in the map below:



*Figure 7 – Map of site and nearby properties' window locations*

- 9.4 The windows on John Dodgson House (a student housing block) are adjacent to where the existing height was highest and therefore experience the least amount of impact from the increase in height and massing on the roof. In conjunction with this the use is a student housing block which is also a less sensitive use than permanent residential. That being said the roof extension does not harmfully increase the loss of outlook and enclosure and therefore is acceptable.
- 9.5 In relation to the properties highlighted above on Hastings Street, the supporting Visual Impact Assessment demonstrates the existing and proposed views from these properties and the level of impact. Below are excerpts from views from Thanet Street facing Hastings Street and the southern elevation of the site. It is important to note that the windows for 105-121 Judd Street highlighted in figure 5 above serve a commercial use and therefore are less sensitive in terms of outlook and enclosure.

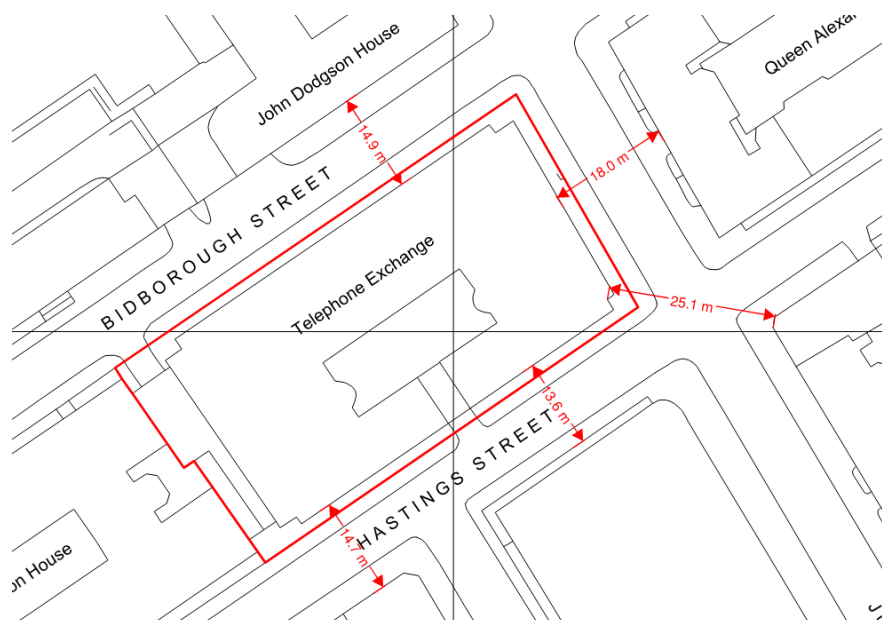


*Figure 8 – existing and proposed view from Thanet Street*

- 9.6 What is clear is that there is an increase in massing along the building line which are closer to the properties along Hastings Street and the properties along Thanet Street. However, the consequential impact of this increase is somewhat negated due to the existing massing of the building set further towards the Bidborough street side which would still be read from windows along neighbouring properties. This means that massing, albeit slightly further away, exists on the site currently and the impact of the extension only slightly adds to this relationship and with the building distances being approximately ranging from 13.5m – 14.7m the level of impact is not harmful.

### **Overlooking and privacy**

- 9.7 Camden Planning Guidance (Amenity, January 2021) provides detailed advice on the protection of privacy and outlook, supporting Camden Local Plan Policy A1 – Managing the Impact of Development. The guidance emphasises that developments should be designed to protect the privacy of both existing and proposed dwellings, and that mitigation measures should be incorporated where necessary to reduce overlooking. Paragraph 2.4 recommends a minimum separation distance of 18 metres between directly facing habitable room windows, unless the historic character of the area dictates otherwise. The screenshot below demonstrates the existing distances away from the most sensitive (residential and student housing uses). The proposal will not change any of these minimum distances.



*Figure 9 - Map of site and building distances*

- 9.8 The majority of the building is being retained and refurbished and therefore the development will not change the relationship between the surrounding



buildings. There are no roof terraces being proposed as part of the development (noting that objectors have raised this as a concern) and a condition will be placed on the application to ensure any flat roofed areas are not used as roof terraces. The existing windows are also just being replaced and therefore will not increase the level of overlooking or loss of privacy that already exists.

- 9.9 The roof extension does involve new windows on all elevations and therefore the Council recognises there is a slight increase in the level of overlooking as a consequence of the extension. However, these windows have the same relationship as the existing ones with even some of the upper floors being set back further and therefore it is accepted that the increase in overlooking is not harmful. Moreover, the level of glazing on the roof extension facing the most sensitive uses (which are residential) on Hastings Street and Judd Street is reduced and with the bay features designing in measures to reduce overlooking and privacy. The northern elevation which faces less sensitive use in student housing has slightly more glazing however still retains an acceptable distance and relationship to ensure the impact is not harmful.
- 9.10 Overall the proposal does not harmfully impact on privacy and overlooking, in accordance with guidance within the amenity CPG and policy A1 of the 2017 Local Plan.

### ***Daylight and sunlight***

- 9.11 This section assesses the impact of the proposed development at 123 Judd Street on the daylight and sunlight received by neighbouring properties. The assessment is based on the technical report prepared by GIA (August 2025), which follows the methodology set out in the Building Research Establishment (BRE) Guidelines 2022: Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice.
- 9.12 The BRE Guidelines provide recommended targets for daylight and sunlight levels, but also state that these should be applied flexibly, especially in dense urban areas where some reduction in light is often unavoidable.
- 9.13 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 ‘Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice’ (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 9.14 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit

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

### Methodology

9.15 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.*

### Relevant neighbours and initial assessments

9.16 Below details a map of the relevant neighbours that have been identified and then assessed within the daylight/sunlight assessment. The Council has confirmed that the identification of these neighbours is appropriate and reasonable.

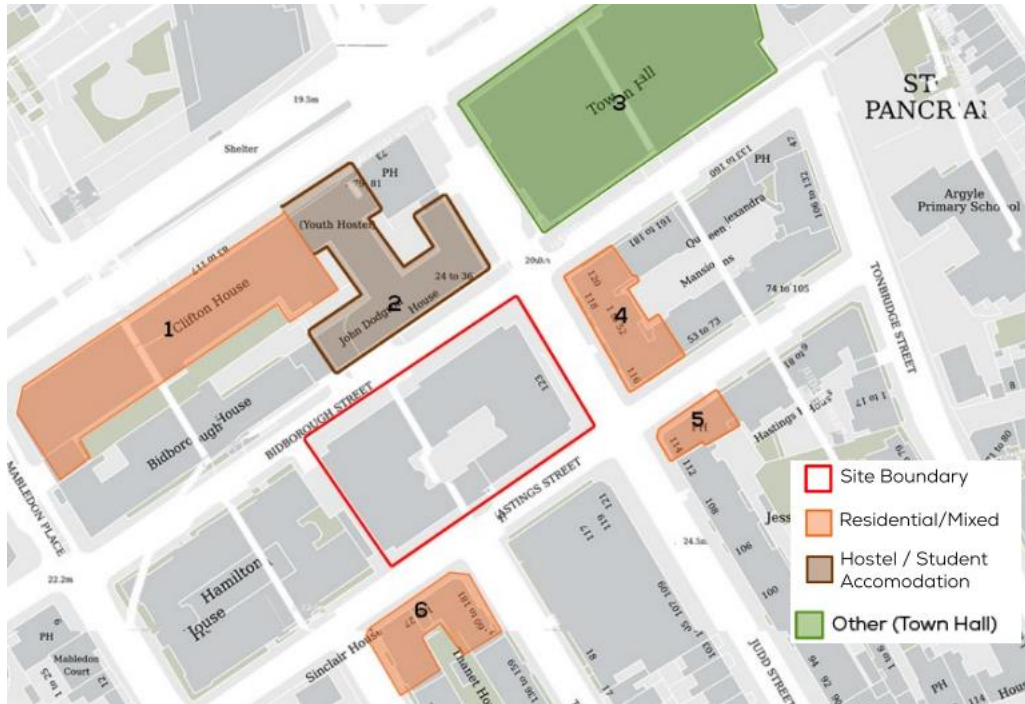


Figure 10 – Map of site and buildings assessed in daylight/sunlight study

- 9.17 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. 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.*

- 9.18 Whilst not a housing scheme in this case it is still considered that similar principles extend to optimising the use of valuable sites in the central area while still achieving reasonable expectations for daylight and sunlight for existing residents.
- 9.19 For urban development densities found more typically in Camden such as Bloomsbury planning officers have noted that VSC values of 15% to 20% can be tolerated as an acceptable norm. There will always be the higher values of 27% and above found in dwellings on upper floors or facing across open spaces like parks, squares and larger gardens, while at the same time VSC values of less than 10% are common, more usually for secondary

windows such as those facing into alleyways and lightwells. The reliance on artificial lighting for such rooms can be accepted, especially where the room itself also serves a secondary function or used more at night-time such as a bedroom.

9.20 Both Hamilton House and 105 – 121 Judd Street have not been assessed as they are commercial uses and therefore much less sensitive than the uses highlighted above.

9.21 The assessment was carried out using a 3D model of the site and surrounding buildings, incorporating verified survey data and available floor plans. The table below summarises the compliance of each neighbouring property with BRE guidelines:

<b>Property Name</b>	<b>Use Type</b>	<b>BRE Compliance Summary</b>
Clifton House	Residential	Fully compliant
79–81 Euston Road	Student Hostel / PBSA	Partial compliance
Town Hall	Civic / Non-residential	Fully compliant
Queen Alexandra Mansions	Residential	Partial compliance
114 Judd Street	Residential	Fully compliant
Sinclair House	Residential	Partial compliance

*Figure 11 – Summary table of daylight/sunlight impact*

Assessment

9.22 As you can see from the table above Clifton House, the Town Hall, and 114 Judd Street are fully compliant in terms of daylight/sunlight impact and therefore are not assessed further. 79-81 Euston Road, Queen Alexandra Mansions and Sinclair House are discussed further below.

*79-81 Euston Road (Student hostel/PBSA)*



*Figure 12 – aerial photo of 79-81 Euston Road*

- 9.23 The BRE Guidelines only references student accommodation in terms of daylight amenity to any proposed schemes (paragraph C17) and no specific guidance is given beyond that provided for standard sensitive users, in respect of impacts on neighbouring student accommodation and the treatment of existing student bedrooms. In this instance, whilst there is a small change to the transitory nature of student accommodation compared with traditional residential uses only slightly less weight is given in relation to the impacts. The assessment is based on 185 windows serving 170 rooms.
- 9.24 125 (67.5%) of the 185 windows rooms will be fully BRE compliant in relation to VSC and NSL and of the 138 windows which are relevant for sunlight assessment (in that they are oriented within 90-degrees of due south), 123 windows (89%) will meet the BRE's recommendation for annual summer and winter sunlight.
- 9.25 Of the 60 rooms assessed to have failed VSC in accordance with BRE guidance, 12 (20%) will see changes in VSC no greater than 29.5% and are therefore considered minor transgressions. Therefore 48 rooms will experience transgressions that exceed BRE guidance. 46 of these are bedrooms and 2 of these are LKDs.
- 9.26 The absolute VSC changes to the 46 bedrooms, range from 4.2% to 8% which equate to percentage of baseline changes ranging from 22.4% to

33.1%. This absolute loss of 4.2-8 is a very low number and therefore would not be a noticeable change.

- 9.27 The windows serving the 2 LKDs will experience VSC changes of 24.2% and 24.7% of the baseline levels and retain VSC levels of 24% against the BRE recommended 27% for properties in a suburban location. These changes mean that whilst these do fail, the existing absolute VSC scores are so low that minor changes equate to large percentage losses. In this context officers can accept these losses and do not consider these are harmful in the context of low existing baseline figures.
- 9.28 The retained light levels remain reasonable, and the changes are minor. Moreover, the building's transient use (student accommodation) could be seen as less sensitive than more permanent residential accommodation and therefore the weight given to the light losses affecting these windows is less. Within this dense urban context in Central London with narrow street widths light loss remains somewhat inevitable. In this case the mitigating circumstances of the use, context but also the relatively low level of daylight/sunlight loss across much of the building means, on balance the level of impact is acceptable.
- 9.29 Of the 138 windows which are relevant for sunlight assessment (in that they are oriented within 90-degrees of due south), 122 windows (88%) will meet the BRE's recommendation for annual and winter sunlight paragraph. The 16 windows that fall short are all bedrooms contained within the ground and first floor. These windows, all serving bedrooms which are considered 'less sensitive' only have minor transgressions and all retain good light levels between 21%-36% (against a 25% target). Overall the impact in terms sunlight is acceptable and not harmful.

*Queen Alexandra Mansions (Residential flats)*



*Figure 13 – Aerial photo of Queen Alexandra Mansions*

- 9.30 Queen Alexandra Mansions is a predominantly residential building with a small commercial unit on the ground floor. The property is made up of a number of individual flats and is located directly east of the Site.
- 9.31 When assessed against the VSC methodology, considered to be the most reliable measure of daylight, for daylight all 77 windows (100%) will meet the BRE's recommendations and therefore all pass this test.
- 9.32 When assessed against the NSL methodology for daylight, 48 of the 67 rooms (72%) will meet the BRE's recommendations and of the 75 windows which are relevant for sunlight assessment (in that they are oriented within 90-degrees of due south), 73 windows (97%) will meet the BRE's recommendation for annual and winter sunlight
- 9.33 Of the 19 rooms that fail the NSL test, 11 of these are bedrooms which are categorised as less sensitive. Furthermore of these 11 bedrooms 8 experience minor NSL reductions which exceed BRE guidelines between 23.2% and 26.5%. The remaining 3 will experience transgressions between 26.5% and 37.0%. The remaining 8 rooms serve living rooms with 4 experiencing minor transgressions, 3 medium and 1 major respectively. The moderate and major losses are between 34.5% and 41.3%. Below figure 14 taken from QAM DLSL Consultation letter outlines this.

Living Room Reference:	Percentage % NSL Reductions in Appendix 04 of GIA Report
F03 R4	22.3%
F03 R5	24.2%
F04 R4	34.5%
F04 R5	35.5%
F05 R4	36.9%
F05 R5	41.3%
F06 R4	24.6%
F06 R5 - 29.2%	29.2%

*Figure 14 – table of VSC scores taken from QAM DLSL letter*

- 9.34 The loss of 41.3% is a major loss however the existing NSL score remains 56.6 which is still considerable in the context of the living room. When considering this and in the context of the good VSC scores and inner urban location these figures are accepted by the Council as being acceptable.
- 9.35 For AP5H, 97% of the windows meet BRE targets with 2 failing. These are shown the photo below and fail due to the recessed design.



Figure 05: Windows falling below guidance for AP SH outlined in yellow (Queen Alexandra Mansions)

*Figure 15 – photo of failing windows*

- 9.36 The proposed development has been designed to minimise impacts on neighbouring properties. While some windows and rooms fall short of BRE targets, these are mostly bedrooms or affected by existing architectural features. The retained light levels are generally good, and the impacts are considered acceptable given the urban context.

*Sinclair House (Residential flats)*



*Figure 16 – photo of Sinclair House*

- 9.37 Sinclair House is a mixed use building with residential on the upper floors and commercial units on the ground floor. The building contains a number of windows facing north to the south elevation of 123 Judd Street.
- 9.38 When assessed against VSC for daylight of the 137 windows tested 117 windows meet the BRE guidance (85%). All 20 of these impacted windows are considered to be subject to minor transgressions and only have percentage losses between 20.2% and 25.6%.



- 9.39 15 windows will retain absolute values of above 15% and four of these windows retain absolute values of over 20% which, as explained above falls within the normal range of buildings in this type of area. The remaining five windows all retain values of 13.6% - 14.6% and are located on the first floor where daylight remains less accessible given the existing height of the surrounding buildings. Overall, these transgressions, in the context of the area and relative low losses do not represent a harmful impact on amenity to Sinclair House.
- 9.40 As per BRE guidelines under paragraph 2.2.10 due to the lack of floor plans available, the property has not been assessed for NSL and due to the windows facing north they are not required to be assessed under APSH.
- 9.41 The figures set out above assume the scheme at 105 Judd Street, which is currently under construction, has been completed. This is used as the baseline in accordance with standard industry practice however officers asked the applicant to give further consideration to the overall impact of the scheme on this property using the former baseline of 105 Judd Street prior to development. The applicants responded with a culminative assessment document which compared the original assessment (with 105 Judd Street included in the baseline) and the assessment where the 105 Judd Street scheme was not part of the baseline.
- 9.42 The culminative assessment shows that an additional 29 windows fall short of BRE Guidelines for VSC but are only within the minor adverse transgression bracket. What is also important to note is that 24 windows are on Sinclair House but on the Thanet Street elevation, so the impact is caused by the from 105 Judd Street application and not the current proposal at 123 Judd Street. They are only impacted in terms of VSC, not NSL or APSH. The remaining five windows are located within Queen Alexandra Mansions but all see minor transgressions of between 20%-21.1%.
- 9.43 Overall this means that the culminative impact of both developments upon neighbours will not substantially different to if only 123 Judd Street was built out. Therefore the.....
- 9.44 The proposal complies with Camden and London Plan policies and the BRE Guidelines. It does not result in unacceptable harm to daylight or sunlight amenity and is therefore considered acceptable in planning terms.

### ***Noise and vibration***

- 9.45 A noise assessment has been submitted by the applicant as part of the application submission. Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings,

BS 4142:2014 “Methods for rating and assessing industrial and commercial sound”.

- 9.46 The plant noise criteria have been adequately predicted, taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 9.47 The assessment indicates that the proposed plant should be capable of achieving the proposed environmental noise criteria at the nearest and potentially most affected noise sensitive receptors.
- 9.48 A Noise Officer has been consulted and is satisfied that the submitted acoustic submission meets the Council’s local plan guidelines and therefore acceptable in environmental health terms, subject to conditions.

## **10. SUSTAINABILITY AND ENERGY**

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

### ***Energy and carbon reductions***

- 10.4 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).
- 10.5 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

### **Energy and carbon summary**

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

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	36.9%
Be green stage (renewables): CLP policy CC1	20%	13.3%
Total carbon reduction: LP policy SI2 and LP CC1	35%	26.1 %

*Figure 17 - Carbon saving targets (for majors) and the scheme results*

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

Total carbon reductions

- 10.8 Reductions are measured against a baseline, the requirement set out in the Building Regulations. Major development should achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021).
- 10.9 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHP) for non-residential developments.
- 10.10 In this case, the development does not meet the policy target of 35% achieving an overall on-site reduction of 26.1% improvement on Part L requirements as shown in Table 1 above. This refurbishment scheme requires a carbon offset payment to bring it to zero carbon as it also includes an extension. The amount for the carbon offset payment is therefore measured against the new extension only. The final fee is £61,130.00 and will be secured via s106 agreement.
- 10.11 The **carbon offset of £61,130.00 will be secured by Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 10.12 London Plan policy SI 2 sets a policy target of at least 15% reduction of carbon emissions beyond the Building Regulations baseline through reduced energy demand at the first stage of the energy hierarchy.
- 10.13 In this case, the development does meet the policy target of 15%, reducing emissions by 36.9% at this stage. The inclusion of acceptable air tightness levels, energy-efficient lighting, services distribution, reducing solar gains

and water consumption and ventilation at the Be lean stage means that the development comfortably achieves the required reduction and is therefore acceptable.

#### Be clean stage (decentralised energy supply)

- 10.14 London Plan Policy SI3 requires developments 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 establishing a new network where this is not possible.
- 10.15 In this case, the existing London heat map has been assessed and demonstrated that no existing local networks are present within the scheme's connectable range. However, the Energy Strategy has stated works will be carried out in order to allow for future connection, if this situation arises. This will also be secured via S106 agreement.

#### Be green stage (renewables)

- 10.16 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 10.17 In this case, the development fails to meet the policy target of 20%, reducing emissions by 13.3% at this stage through renewables, in compliance with the development plan. The proposal includes PV panels on the roof with full details secured by condition. The proposal includes low carbon heating like Air Source Heat Pumps (ASHPs) which are proposed on the building too

#### Be seen (energy monitoring)

- 10.18 The London Plan policy SI 2 requires monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting, which would be secured as part of the S106 agreement.
- 10.19 The **Energy and Sustainability Strategy secured by Section 106 legal agreement** will secure reporting to the GLA in line with their published guidance.

#### ***Climate change adaption and sustainable design***

- 10.20 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

- 10.21 Local Plan Policy CC2 point (h) expects all non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments. A BREEAM Pre-Assessment has been carried out, showing that all main targets are met and exceeded per Policies CC1 and CC2 of the Camden Local Plan 2017. The planning requirement for the proposed non-domestic development is an Excellent BREEAM rating (with a minimum of 70% required for an ‘Excellent’ rating). The proposal reviewed currently achieves a score of 77.06%, which equates to an ‘Excellent’ rating. The Pre-Assessment report shows that:
- Energy – 19 out of 25 credits are achieved, which equates to 76% with a target of 60%;
  - Water – 5 out of 8 credits are achieved, which equates to 62.5%, with the target being 60%,
  - Materials – 12 out of 13 credits are achieved, which equates to 92%, with the target being 40%
- 10.22 The BREEAM Pre-Assessment scores are secured under the Energy and Sustainability obligation, which requires submitting a post-assessment report. A condition will be placed on the application to secure the diversion of 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. Evidence will be provided prior to occupation.
- 10.23 The proposal incorporates water-efficient design measures to minimise on-site water consumption which will be secured within the energy and sustainability plan via s106
- 10.24 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.
- 10.25 The development proposals do not incorporate any increase in hardstanding areas. Including soft landscaping at the new courtyard and further planting on the new terrace would result in reduced surface water runoff from the site.
- 10.26 The proposal incorporates rainwater harvesting, flood protection measures and SuDS which are secured via condition. The Council’s Sustainability Officer has reviewed the proposal and supports the introduction of rainwater harvesting within the hotel.

10.27 The proposal provides green roofs and details of the substrate depth, species, and maintenance, secured by condition to ensure their sustainability and biodiversity contribution.

10.28 Flood risk is covered in the 'Water and Flooding' section of this report.

## **11. AIR QUALITY**

11.1 The Camden Local Plan policy CC4 is relevant with regards to air quality.

11.2 An Air Quality Assessment (AQA) has been submitted as part of this application which was assessed by an Air Quality Officer.

11.3 Whilst the development likely to be used by large numbers of people, it is not expected that they would be particularly vulnerable to poor air quality, such as children or older people.

11.4 An Air Quality Assessment, prepared by Pell Frischmann, concludes that the Proposed Development would lead to a significant reduction in air quality with the construction works having the potential to create dust. During construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emissions. Appropriate measures have been recommended which include dust management, demolition mitigation, trackout mitigation and construction mitigation and, with these measures in place, it is expected that any residual effects will be 'not significant'

11.5 During the operation phase, an assessment of the impact on local air quality due to changes in traffic emissions as a consequence of the operation of the proposed development has been undertaken using dispersion modelling for the key pollutants (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) at a number of human receptors and in accordance with technical guidance published by the IAQM and EPUK and Defra. The assessment results show that the impacts on air quality, with respect to NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> exposure, at the existing human receptors, in the assessment year of 2026, are negligible and not significant.

11.6 The proposals are car-free and are Air Quality Neutral.

11.7 In consultation with the Council's Air Quality officer, the proposals are considered acceptable in terms of air quality subject to conditions on construction related impacts.

11.8 Air quality during demolition and construction would be managed with the CMP, which is secured by section 106. Real time air quality monitoring is required by condition.

## 12. TRANSPORT

### *Policy review*

- 12.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 12.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.
- 12.3 Strategic priorities include:
- increasing walking and cycling;
  - improving public transport in the Borough;
  - reducing car ownership and use;
  - improving the quality of our air; and
  - making our streets and transport networks safe, accessible, and inclusive for all.
- 12.4 On 13<sup>th</sup> November 2024, Camden Council's Cabinet agreed to implement the next phase of the [CTS for 2025 to 2028](#), investing in more environmentally friendly, healthier forms of travel and creating more welcoming streets and neighbourhoods. The strategy includes commitments which are pertinent to this application:
- introduce the Euston to Kings Cross "Wellbeing Walk" to improve the parallel route south of Euston Road especially for pedestrians with wider road safety, cycling and public realm enhancements.
  - work with Transport for London to introduce measures to improve pedestrian and cycle safety and protect bus journey times around the King's Cross gyratory. Phase 2 schemes include the junction of Euston Road with Pancras Road/Belgrove Street, and Grays Inn Road corridor (north) including junction with York Way.
  - work with Transport for London to introduce various amendments to Euston Road including junctions with Churchway/Duke's Road, Ossulston Street/Mabledon Street, and Gordon Street/Melton Street and Eversholt Street/Upper Woburn Place, and Euston Circus.
  - implement Euston Road corridor and junction improvements, led by TfL with support from the Council, which form part of HS2 works and longer term Euston Healthy Streets vision,.

- provide Green Micromobility hubs across the Borough.
- deliver Better Bus Partnership which focuses on improving bus journey times and bus passenger experience by implementing upgrades to bus stop/shelter, including Countdown provision, better bus passenger information, and enhanced interchange via Healthy Streets measures to connect bus passengers to/from other public and shared transport services in local areas.
- continue to deliver our cycle permeability programme which includes making all one-way streets in the borough two-way for cycling.
- implement a series of “Healthy Junctions” improvements to upgrade road safety for all users, including vulnerable road users, at key intersections across the Borough.
- develop a comprehensive network of electric vehicle charging points (EVCPs) that both responds to existing demand for EV infrastructure and provides for and accelerates the uptake of cleaner vehicles in the future, in line with our [Electric Vehicle Charging Point Action Plan](#).
- continue to expand our dockless bike and e-scooter hire network.
- contribute towards the implementation of the CTS Cycling Action Plan and Walking and Accessibility Action Plan.

***Site location and access to public transport***

- 12.5 The site is located in the Central London Area and is bounded by Judd Street to the east, Bidborough Street to the north, and Hastings Street to the south. Euston Road, located to the north of the site, forms part of TfL’s Transport for London Road Network (TLRN).
- 12.6 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent).
- 12.7 King’s Cross St Pancras and Euston stations (London Underground, National Rail, and Eurostar services) are located approximately 450m north and 650m west of the site, respectively. The closest bus stops are located on Euston Road, and outside King’s Cross station.
- 12.8 The site is easily accessible from the Strategic Cycle Network with Cycleway C6 and C41 fronting the development on Judd Street.
- 12.9 The nearest Santander cycle hire docking stations are located on Argyle Street and Cartwright Gardens.



- 12.10 There is a dedicated parking bay for dockless rental e-bikes and rental e-scooters located nearby on Bidborough Street adjacent to the site. However, this bay is already showing signs of overcapacity and increasing demand.
- 12.11 Camden’s Transport Strategy team has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows grades of 4 and 5 in the area, which indicates opportunities for improvement, considering it is our aspiration (and target) for the STAL score to be 6b. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.

***Trip generation***

- 12.12 The anticipated multi-modal person trips generated by the proposed hotel development was calculated using trip rates obtained from TRICS. The results are presented in the Table 5.2 of the Transport Assessment and reproduced here:

Mode Share	AM Peak Hour (10:00-11:00)			PM Peak Hour (20:00-21:00)			Daily		
	Arrival	Departure	Total	Arrival	Departure	Total	Arrival	Departure	Total
Underground	7	34	41	27	8	35	195	243	438
Train	3	15	18	12	4	16	84	104	188
Bus	1	5	6	4	1	5	30	37	67
Taxi	2	10	12	8	2	10	56	70	126
Cycling	0	0	0	0	0	0	1	2	3
Walking	10	49	59	40	12	52	284	354	638
<b>Total</b>	<b>23</b>	<b>113</b>	<b>136</b>	<b>91</b>	<b>27</b>	<b>118</b>	<b>650</b>	<b>810</b>	<b>1460</b>

*Figure 18 – table of trip generation*

- 12.13 Based on other developments in the area, it is anticipated that a high volume of the walking trips generated by the proposal is likely to be made from King’s Cross St Pancras and Euston stations, and the bus stops on Euston Road.
- 12.14 Considering the increase in active travel to and from the site, the applicant will be requested to provide a financial contribution towards the commitments in the CTS delivery programme outlined above.

***Travel planning***

- 12.15 A Framework Travel Plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. The targets for walking mode share should be more ambitious. Modal share projections for walking and cycling will need to be set in accordance with Camden’s Transport Strategy and the Mayor’s Transport Strategy.

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

***Access and permeability***

- 12.17 Pedestrian access points are proposed from Judd Street and Hastings Street. Long stay cycle parking will be accessed from the inner courtyard, whilst external visitor parking will be provided from Hastings Street. Vehicles/taxis to drop off will take place on Hastings Street, adjacent to the pedestrian access. Delivery and servicing strategy includes an internal service yard which is accessed from Bidborough Street. Whilst an initial strategy has been provided final details will be secured via s106 agreement.

***Cycle parking***

- 12.18 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for:

- 12.19 C1 use, Hotels

- 1 space per 20 bedrooms long-stay, and
- 1 space per 50 bedrooms short-stay.

- 12.20 Cycle parking will be provided in accordance with London Plan standards, including 22 long-stay spaces in the basement accessible by lift, while visitors will use the external cycle parking area accessed from Hastings Street which accommodates 31 spaces.

- 12.21 The full cycle parking details will be secured by condition.

***Car parking and vehicle access***

- 12.22 The site is located in controlled parking zone CA-D (Kings Cross Area), which operates 08:30-18:30 Monday to Friday, and 08:30-13:30 on Saturday.

- 12.23 The entire development would be secured car-free by legal agreement if planning consent were granted.

- 12.24 There are two blue badge bays directly outside the site on Hastings Street available to users of the proposed development should they be required. This approach was agreed with the Council's Highways Officer.

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

ownership and car use, and use that study to help guide future reviews and decisions.

12.26 In alignment with that action, Camden's Controlled Parking Zones (CPZ) Review final report, which was published in February 2023, independently appraised all of Camden CPZs using a multi-criteria assessment. The findings show that there is a greater need to manage parking demand in the borough through the hours of CPZ controls. The CPZ Assessment Results show that CA-D CPZ performed relatively poorly in terms of the impact of its current hours of control in helping manage demand, and was attributed a "Red" RAG status, which present the greatest need and/or justification for increasing the regulation parking. The review recommends, amongst others, that the CA-D hours of operation are extended subject to consultation and decision-making processes.

12.27 In 2024 we reviewed our progress so far on the CTS and also set out our delivery plan for the period covering 2025 - 2028 which was agreed by Camden Council's Cabinet. We committed to deliver a package of Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough:

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

12.28 At present, the CA-D CPZ control hours do not extend into the evening, nor do they cover much of the weekend, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This has a potential to increase on-street parking pressure which may drive demand for CPZ reviews. Considering the scale and the location of the proposed development, it is appropriate to request a contribution of £30,000 towards the CA-D CPZ review, which is likely to take place in 2025/26.

### ***Coach parking***

12.29 There is concern over the possibility of the hotel attracting the arrival of coach parties (which may be outside the applicant's control) causing delays and safety issues in close proximity of the hotel. We would therefore require a planning obligation to be secured by legal agreement stating that no coach party bookings will be accepted and a ban on customers being picked up or dropped off by coach at any time directly outside the hotel, in accordance with Camden Local Plan Policy E3 (paragraph 5.60).

### ***Construction management***

12.30 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and

materials during the construction process (including any demolition works). A draft Construction Management Plan (CMP) using the Council's CMP pro-forma was provided with the application.

- 12.31 The site is located on Judd Street, which forms part of the strategic cycle route network. Euston Road which forms part of part of TfL's Transport for London Road Network (TLRN), is just to the north of the site. 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.
- 12.32 A more detailed CMP document will also be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.
- 12.33 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed with Camden Council.
- 12.34 The contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.
- 12.35 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.
- 12.36 Implementation support contributions of £30,513 and impact bonds of £32,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.
- 12.37 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.

### ***Highway works***

- 12.38 The financial contribution towards highways works is a standard request applicable to all major developments where construction works might result in damage to public highway. We will therefore be requesting a highways contribution of £50,000 to be secured by legal agreement if planning

permission is granted. Any unspent funds will be returned to the applicant, per standard practice.

### ***Pedestrian, cycling, environmental improvements***

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

12.40 In line with the increase in walking and cycle trips generated by the proposed development and further promoted by the requested Travel Plan, we will seek a financial contribution of £426,540 towards:

- Euston to Kings Cross ‘Wellbeing Walk’ to improve the parallel route south of Euston Road which fronts the site, with public realm improvements, footway widening, adding/improving crossings on Bidborough Street.
- improving the Cycleway alignment on Judd Street corridor and on the side roads off Judd Street.
- introducing continuous footways and other road safety improvements at junctions along Judd Street, in line with our walking & accessibility action plan.
- delivery of our cycle permeability programme which includes making all one-way streets in the borough two-way for cycling.
- a series of “Healthy Junctions” improvements to upgrade road safety for all users, including vulnerable road users, at key intersections.

12.41 This contribution would be secured by S106 legal agreement if planning permission is granted.

### ***Micro and shared mobility improvements***

12.42 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.

- 12.43 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 grade and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 12.44 A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured as a Section 106 planning obligation if planning permission is granted. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

### ***Conclusion***

- 12.45 The proposal is acceptable in terms of transport implications subject to the following conditions and planning obligations being secured by legal agreement:
- Travel Plan and associated monitoring and measures contribution of £11,348.
  - Car-free development.
  - No coach pick up and drop off.
  - CA-D CPZ review contribution of £30,000.
  - Construction management plan (CMP) implementation support contribution of £30,513 and CMP Impact Bond of £32,000.
  - Requirement to form a construction working group consisting of representatives from the local community.
  - Delivery and Servicing Plan.
  - Highway works contribution of £50,000.
  - Pedestrian, Cycling and Environmental Improvements contribution of £426,540.
  - Micro and shared mobility improvements contribution of £10,000

## **13. TREES, GREENING, AND BIODIVERSITY**

### ***Impact on trees, greening and biodiversity***

- 13.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation. This approach is supported by LP policy G5 which uses Urban Greening Factor (UGF) targets to evaluate the quality and quantity of urban greening. The policy applies a target of 0.3 for mainly commercial schemes.

- 13.2 The development site mostly contains the large telephone exchange building which means that public realm and landscaping improvements which can increase the green infrastructure of the site remains difficult. However, the scheme includes ground floor activation which opens up the courtyard for hotel visitors and the public using the restaurant/bar use in the building. The landscaping includes sculptured seating, potted planting and trees as well as high quality hard landscaping in the form of small paving units.
- 13.3 The London Plan uses the UGF scores to help objectively evaluate the quality and quantity of urban greening. The proposals achieve an UGF of 0.23 which is under the target of 0.3.
- 13.4 The proposals have been developed to create significant opportunities for greening within the project red line boundary while also meeting the needs of the client and users. These components include trees and herbaceous pot planting, green roof systems, and a permeable 'blue roof' paving to the flat roofs.
- 13.5 The majority of the site boundary comprises the access road to the west and the building footprint. Introducing planting or trees in these areas would have implications for the site's structural loading requirements.
- 13.6 The courtyard contains two large lightwells and is relatively small, making the inclusion of planting or trees impractical without compromising accessibility. The previous iteration of the scheme at pre-application stage included terraces; however, these were removed following comments received during feedback during the consultation event
- 13.7 Given these constraints, the inclusion of trees or additional planting on-site is not feasible.
- 13.8 The scheme will be providing plenty of planted pots around the landscape spaces where rain gardens / permanent planters are not feasible. These do not contribute towards the UGF score but they provide greening value to the site.
- 13.9 As this is a constrained, retrofit first scheme the design is working hard to reach the suggested 0.23 UGF score. As stated in London Plan Policy G5 the score of 0.3 is a target not a requirement. Considering the information above, overall the scheme provides as much urban greening, planting and landscape improvements as is feasible, especially in relation to the biodiverse roofs and landscaping on the ground floor which improves green infrastructure throughout the site. Therefore the score of 0.23 is accepted and secured via condition.

- 13.10 In addition to the UGF, a Daytime Bat Walkover Survey (DBW) was commissioned. The assessment focused on bats and nesting birds, in line with best practice guidance (CIEEM, 2019). The DBW was conducted on 22 October 2024 and identified ten low-suitability bat roosting features, primarily cracks and weep holes in the building's brickwork. No evidence of bat activity was found but nesting birds were observed. The Council's Nature Conservation officer has advised that the survey work undertaken is sufficient and a condition securing details of 4 bird and bat boxes should be attached to any permission granted.
- 13.11 As well as this details of the lighting strategy will be secured via condition to ensure the proposed lighting takes into consideration bats and birds.
- 13.12 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan. Overall, the proposal complies with A2 and A3 of the 2017 Local Plan.

### ***Statutory Biodiversity Net Gain***

- 13.13 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 13.14 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.
- 13.15 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.

## **14. WATER AND FLOODING**

- 14.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 14.2 In this case, the development includes large biodiverse roofs and sustainable drainage including permeable paving and water pumps



- 14.3 The site is located within Flood Zone 1. The application site is also located in a Critical Drainage Area but not identified as being at risk from flooding. The basement is part of the existing structure but does include 20 rooms below ground as part of this proposal.
- 14.4 A Flood Risk Assessment and a Sustainable Urban Drainage Strategy have been submitted as part of this application. The submitted documents include drainage calculations, exceedance flow routes and maintenance tasks ownership. SUDS are proposed in order to manage the water environment on and around the site.
- 14.5 As the existing and proposed site areas and impermeable areas are the same, the existing run off volume will be as per the proposed runoff volume.
- 14.6 In consultation with the Lead Local Flood Authority, the development will have an acceptable impact on flooding in the area. In relation to the subterranean rooms in the basement following additional mitigation measures being included, including a flood proof door, the Flood Authority is satisfied that acceptable mitigation measures are in place and the risk of flooding would be considered low.
- 14.7 The Lead Local Flood Authority is happy with the proposals subject to conditions on SUDS and living roof. Given the above, the proposed measures are considered acceptable in terms of flood risk.

## **15. SAFETY AND SECURITY**

- 15.1 Camden Local Plan policy C5 and CPG Design are relevant with regards to secure by design. Policy C5 requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime.
- 15.2 Currently the site is a telephone exchange with very little activation on the ground floor. The proposed scheme would open the site up and significantly improve natural surveillance.
- 15.3 A Crime Impact Assessment (CIA) was also prepared by QCIC and submitted as part of the application. The CIA identifies prevalent local threats including theft from the person, anti-social behaviour, burglary, and unauthorised access. Using Metropolitan Police crime data, the report highlights the need for robust security interventions. These include:
- Crime Prevention Through Environmental Design (CPTED) principles.
  - Enhanced natural and active surveillance (e.g. CCTV).
  - Access control systems, intrusion-resistant doors/windows, and vehicle mitigation measures.
  - Clear spatial arrangements to reduce conflict and promote ownership.

- Operational management strategies to ensure long-term safety and maintenance.
- 15.4 The Designing Out Crime officer was consulted by the Council following submission. Overall, the officer raises no objection to the proposal, subject to conditions in relation to the building securing the silver design accreditation (which is placed on the application) but does raise a number of useful observations and recommendations for the applicant to take account of going forward. These include advice on site management, landscaping and security rated design to mitigate anti-social behaviour and theft. Some of these will feed into the operational and construction management plans which will be secured via s106 agreement.
- 15.5 During construction, temporary hoarding, lighting, and roaming security patrols are recommended to mitigate risks associated with partially occupied sites. An end use lighting strategy will also be secured via condition to ensure the lighting provides a good level of safety.
- 15.6 The overall impact of the development is considered positive. The scheme will rejuvenate a vacant building, enhance public realm, and contribute to a safer urban environment. The integration of layered security measures and proactive management will reduce opportunities for crime and anti-social behaviour, aligning with Camden's strategic planning objectives and national policy requirements. Overall, the Council recommends a condition to secure the silver design accreditation and therefore the development is acceptable from a safety perspective.

## **16. ACCESSIBILITY**

- 16.1 Policy C6 of the Local Plan seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities by expecting all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.
- 16.2 The existing building will be altered to ensure users benefit from step-free access at the main entrance into the courtyard on Hastings Street but also from the entrance on Judd Street. The scheme will introduce internal wheelchair lifts and improved circulation to ensure all spaces are accessible. The proposed development would meet the standards of accessible and inclusive design as required by Policy C6 of the Local Plan and therefore would accord with the development plan in this regard.
- 16.3 A condition requiring the provision of 24 (10%) fully wheelchair-accessible rooms will be placed on the application. This ensures that the internal layout of the building ensures sufficient provision for the needs of people with

disabilities in accordance with the requirements of Policy D5 of the London Plan 2021 and Policy C6 of the London Borough of Camden Local Plan 2017.

## **17. FIRE SAFETY**

- 17.1 London Plan policy D12 Fire Safety requires all development proposals to achieve the highest standards of fire safety and incorporate the necessary measures to ensure the safety of occupants. All major development proposals should be accompanied by a Fire Statement produced by a suitably qualified assessor detailing how the development proposal will function in terms of 1) construction methods, products and materials; 2) means of escape; 3) features reducing risk to life; 4) access for fire services and equipment; 5) provision within the site curtilage for fire appliances to access the building; 6) ensuring any potential future modifications to the building will not compromise the base build fire safety/protection. Policy D5 (Inclusive Design) is also relevant regarding providing safe and dignified emergency evacuation for all building users.
- 17.2 The Mayor introduced the London Plan policy to ensure fire safety is addressed at the outset when planning permission is applied for, instead of the issue being first considered at the Building Control stage. The Fire Safety London Plan Guidance accompanies the London Plan policy. The guidance states that the onus is on the applicant to demonstrate compliance with D12 and D5 through its use of fire safety professionals and that the planning officer must ensure the information has been provided. The review of the fire safety measures and their compliance with building regulations and standards will still take place at the Building Control stage. It shall not be undertaken by planning officers.
- 17.3 The application is accompanied by a "Fire Safety Statement" document outlining the critical fire safety features incorporated within the development. The submitted document has been prepared by Fire Safety Statement and prepared by Semper, a firm of qualified fire engineering consultants. It provides information on means of escape (including disabled refuge spaces), fire resistance to building structure elements, smoke clearance vents, fire-fighting staircase core provision, alarm systems and fire suppression measures. The Council's Building Control officer has reviewed the proposals and confirmed they are acceptable and in accordance with policy D12.
- 17.4 Given the above, the proposals are considered to comply with London Plan policies D12 and D5.

## **18. HEALTH IMPACT**

- 18.1 Camden Local Plan policy C1 seeks to promote strong, vibrant, and healthy communities and requires major development proposals to include a Health Impact Assessment (HIA). The Councils Planning for Health and Wellbeing CPG requires major developments to provide a HIA in support of the application. Accordingly, an HIA has been submitted with the application and reviewed by Camden officers.
- 18.2 This should contain a series of evidence based-recommendations setting out how a scheme can be enhanced and any mitigation measures that may be required. The assessment methodology is based on the World Health Organisation (WHO) definition of health as well as using the London Health Urban Development Unit (HUDU) tool which assesses health impacts under 11 different health determinants.
- 18.3 Considering all of the relevant assessment criteria within these 11 health determinates, the scheme provides either a neutral or positive impact to the local impact area. There are no instances where this produces a negative impact. In particular all criteria's within the access to work and training, minimising use of resources, and climate change determinants experience a positive health impact
- 18.4 The improvements to the public realm are likely to encourage active travel in the local area for all. Table 4.4 references the TfL healthy Streets approach, how this will prioritise active travel and encourage walking as well as providing accessibility improvements for people with mobility issues.
- 18.5 Moreover the impact assessment demonstrates the scheme will contribute to a positive impact on reducing crime and improving community safety partly through lighting levels but also having activated the ground floor and involves local community groups within the consultation process.
- 18.6 Overall, the health impact of the scheme will be positive with mitigation methods specified where the impact is deemed to be neutral.

## **19. CONTAMINATED LAND**

- 19.1 Camden's records show potentially contaminative historic land uses and also indicate the presence of a historic telephone exchange on site (reported to be a low risk).
- 19.2 From review of the proposal from the contaminated land officer, overall, the proposed development is considered to be a low risk to proposed end users, with no plausible pathway identified to potential contamination beneath the site (hardstanding/raised planters proposed).

19.3 A condition is applied, in the event that any contamination is encountered during the development works, noting that a historic land use has been identified on the subject site.

## **20. EMPLOYMENT AND TRAINING OPPORTUNITIES**

20.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is for more than 1,000sqm and £3 million 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.

20.2 Sections 54-60 of the CPG Employment Sites and Business Premises expect a financial contribution where there is a loss of employment space/office over 500 sqm. The number of full-time (FT) jobs created through the hotel use would not be dissimilar to the existing use despite it being an employment use because of the unique nature of the use, but it would still be fewer which should be compensated for. The contribution is based on the difference between the number of jobs expected to be supported if a building remained in its existing employment-generating use and the number of jobs expected to be generated by the hotel use.

20.3 As per section 7 above the contribution amount would be £47,940 for the loss of employment space which will be secured via s106 agreement.

20.4 Regarding Local Procurement, the applicant would also sign up for the Camden Local Procurement Code (to be secured as part of the section 106 legal agreement), as per section 61 of the Employment Sites and Business Premises CPG. Camden's local procurement code sets a target of 10% of the total value of the construction contract. Spending a significant proportion of the total construction build cost on supplies/suppliers and sub-contractors within the Camden borough area will support local businesses and the overall functioning of the local economy.

20.5 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term by:

### ***During construction***

- **Apprenticeships** The applicant should recruit **1 apprentice per £3million** in build costs and pay the council a support fee of £1,700 per apprentice as per clause 63 of the [Employment Sites and Business Premises Supplementary Planning Guidance](#) (SPG). The Economic and Social Value Statement submitted by the applicant suggests build costs of £50.4million, which equates to **17 construction apprenticeships and a contribution of £28,900**. Recruitment of construction apprentices should be conducted through the Council's Euston Skills Centre. If these

apprenticeships are not delivered, a default payment will be required (as per section 65 of the CPG)

- The applicant has indicated a willingness to work with the Council to **pilot/test a different approach to the delivery of 5 of the construction apprenticeship placements**. Through this pilot, the salary costs for the apprentices for 1 year will be paid to the Council on implementation of the planning permission. The Euston Skills Centre will then work with the scheme contractors to recruit apprentices into their businesses and will pay the contractors the salary costs in arrears. The hypothesis is that the contractors will find it easier to create the apprenticeships if the funding for these roles has already been ringfenced and secured and doesn't need to come from their budget.
- As per section 69 of the SPG, the applicant should provide **4 construction work experience placements** of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Euston Skills Centre (based on uplift of 2,000 sqm of employment floorspace). If these placements are not delivered, a default payment will be required (as per section 69 of the CPG)
- **Local Procurement** - the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area. The Economic Development Team will liaise and assist with the developer to provide details of local suppliers and subcontractors.

### ***Post construction***

- 20.6 Policy E2 of the CLP also encourages end uses to support employment opportunities through apprenticeships and training placements. The CPG advises this and applies to major commercial developments which will result in a net increase of 1,000sq m (GIA) or more of employment space including office, hotel and leisure developments.
- 20.7 The applicant has developed a strong and bespoke training and employment programme, the Camden Hospitality Academy (CHA), to support residents into work in the hotel in the occupation phase of the development and in other hospitality venues. This programme will be delivered in partnership with Springboard and Hilton Foundation. The proposal has been developed in consultation with Inclusive Economy officers, and we are supportive of the proposal.
- 20.8 The details of delivery will be set out via an operational strategy to be secured via the S106 agreement, including the minimum number of 10 years over which the Academy will be operational.
- 20.9 Below is a brief summary of CHA's programme:

- Referral pathways from Good Work Camden and our partners;
  - A focus on Camden Youth Mission priority cohorts;
  - A training schedule involving; Two full training courses and two taster courses per annum accommodating around 68 participants. Training delivered onsite at 123 Judd Street with work experience both onsite and at other Hilton hotel;
  - Support for graduates to apply for apprenticeships and other job opportunities at 123 Judd St, other hotels operated by Dominus Hospitality and other Hilton Hotels; and
  - Regular provision of monitoring information confirming employment outcome figures for participants.
- 20.10 This is to be further worked up with the Council's Inclusive Economy team through drafting of the S106 agreement.
- 20.11 The applicant should also commit to a number of **end use apprenticeships and work experience placements** as per sections 74 and 75 of the SPG. We would suggest 5 apprenticeships to be employed onsite for 10 years following occupation. As per section 73 there is also a commitment to 5 work placements
- 20.12 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.

## **21. REFUSE AND RECYCLING**

- 21.1 Policy CC3 (Waste) states that the Council will seek to make Camden a low-waste borough. Part (d) of the policy states that we will ensure that developments include facilities for storing and collecting waste and recycling.
- 21.2 The Site currently benefits from an internal service yard at the northwest corner of the building, accessed from a gated entrance on Bidborough Street where servicing vehicles reverse off the highway into the service yard. The service yard allows for vehicle access for deliveries, security and waste storage and collection. It is proposed that this arrangement will be retained, with the service yard remaining in use and secured by gates that open inwards into the Site. Vehicles will reverse into the service yard and exit in forward gear in line with the existing situation. This arrangement ensures that all delivery and servicing takes place on-site rather than on the public highway, avoiding obstruction to traffic flow, potential conflicts with other road users, and adverse effects the existing servicing arrangements of surrounding buildings. The existing BT access & parking requirements will also be retained in the service yard area.

21.3 A condition that requires the waste storage to be provided before the commencement of the use hereby permitted and retained for the duration of the development is placed on the application and a detailed Delivery and Servicing Plan will be secured by legal agreement if planning permission is granted.

## **22. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

22.1 The CIL applies to all proposals which add 100m<sup>2</sup> of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m<sup>2</sup>) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.

22.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (MCIL2) with an estimated liability of **£333,810.92**.

22.3 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 **£259,548.00**.

22.4 The total CIL Liability therefore is estimated at **£593,358.92**

## **23. CONCLUSION**

23.1 The principal land use proposed - a hotel with ancillary facilities - is considered acceptable and aligns with both the London Plan and Camden Local Plan policies supporting visitor infrastructure and development supporting the local economy. The retention of the telephone exchange ensures continuity of critical infrastructure while optimising underutilised space.

23.2 The Camden Hospitality Academy represents a significant social benefit, offering targeted employment and training opportunities for local residents, particularly those from priority cohorts. The applicant will work with the partner body 'Springboard' and the Council in retraining local residents in the hospitality sector. The loss of the employment space is justified by the building's current vacancy and the substantial employment benefits generated by the hotel use.

23.3 The absence of on-site housing is supported by detailed feasibility analysis, and the proposed payment in lieu will directly contribute to the delivery of a local affordable housing scheme at 39 Tottenham Street, which otherwise may have difficulty coming forward due to a funding gap.

23.4 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and clear and convincing justification for the harm



is required. The scheme has evolved through a robust design process which included being assessed by the Council's Design Review Panel (DRP) and provided a high quality design with a strong architecture that a strong connection to the existing building. However, less than substantial harm from the roof extension has been identified on the Bloomsbury Conservation Area and considerable weight and importance must be given to that harm. There are a number of public benefits that outweigh the harm, and as such, the proposal remains in accordance with the development plan as a whole. The public benefits of the scheme include:

- Full payment in lieu for affordable housing, which partly funds delivery of affordable housing at 39 Tottenham Street with heritage benefits in refurbishing the building
  - High quality designed extension
  - New hotel in the Central London Area supporting the visitor economy.
  - Significant employment and training package with the establishment of Camden Hospitality Academy.
  - Significant transport and highway contributions.
  - Improved activation with public realm surrounding 123 Judd Street and new restaurant/café use on ground floor.
  - BREEAM 'excellent' building.
- 23.5 The scheme incorporates high-quality landscaping and urban greening measures, contributing positively to the public realm and achieving an acceptable Urban Greening Factor. Accessibility and inclusive design standards have been met, with 10% of hotel rooms designed to be wheelchair accessible.
- 23.6 Environmental assessments confirm the development will be energy efficient, air quality neutral, and resilient to climate change, with a commitment to achieving BREEAM 'Excellent'. Transport impacts have been thoroughly assessed, with the proposal promoting sustainable travel and being car-free.
- 23.7 The development will not result in unacceptable impacts on daylight, sunlight or noise, and appropriate mitigation measures are proposed. Biodiversity and ecological impacts are minimal and have been addressed in accordance with relevant legislation.
- 23.8 In conclusion, the proposed development is considered to comply with the development plan as a whole, delivers substantial public benefits, and represents sustainable and appropriate use of a highly accessible site. It is therefore recommended that planning permission be granted.

## **24. RECOMMENDATION**

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

### ***Land use***

- Hotel operational management plan.

### ***Energy and sustainability***

- Zero carbon offset payment of £61,130.
- Energy Plan securing:
  - Be Lean Stage of 36.9%
  - Bre Green Stage of 13.3%
  - Overall reduction of 26.1%
- Sustainability plan (BREEAM compliance) – secure BREEAM Excellent rating (Overall score of 77.06%, 76% for Energy, 62.5% for Water, 90% for Materials).
- Future proofing heat network connection.

### ***Housing***

- Payment in lieu of £1,005,000 for Affordable Housing directed to affordable housing scheme at 39 Tottenham Street or other such site as may be identified as an alternative if required.

### ***Transport***

- Travel Plan and associated monitoring and measures contribution of £11,348.
- Car-free development.
- No coach pick up or drop off.
- CA-D CPZ review contribution of £30,000.
- Construction management plan (CMP) implementation support contribution of £30,513 and CMP Impact Bond of £32,000.
- Requirement to form a construction working group consisting of representatives from the local community.
- Highway works contribution of £50,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £426,540.
- Micro and shared mobility improvements contribution of £10,000.
- Delivery and Servicing Management Plan.

### ***Employment and training***

- Loss of employment space contribution of £47,940.
- Delivery of the 'Camden Hospitality Academy' in partnership with Springboard and the Hilton Foundation with associated operational strategy document

- 17 construction apprenticeships and a contribution of £28,900
- Pilot/test a different approach to the delivery of 5 of the construction apprenticeship placements.
- 4 construction work experience placements.
- Local procurement.
- 5 work placements to be employed onsite for 10 years following occupation.
- The applicant should work with the Kings Cross Construction Skills Centre to recruit for vacancies.
- Joining the Council's Inclusive Business Network
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit to vacancies locally.
- Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives.

## **25. LEGAL COMMENTS**

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

## 26. CONDITIONS

1	<p>The development hereby permitted must be begun not later than the end of three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>4877-STA-XX-00-DR-A-00100 Site Location Plan  4877-STA-XX-00-DR-A-00101 Site Plan  4877-STA-XX-B1-DR-A-01099 (Rev F) Basement Floor Plan as Existing  4877-STA-XX-00-DR-A-01100 (Rev F) Ground Floor Plan as Existing  4877-STA-XX-01-DR-A-01101 (Rev F) First Floor Plan as Existing  4877-STA-XX-02-DR-A-01102 (Rev F) Second Floor Plan as Existing  4877-STA-XX-03-DR-A-01103 (Rev F) Third Floor Plan as Existing  4877-STA-XX-04-DR-A-01104 (Rev F) Fourth Floor Plan as Existing  4877-STA-XX-05-DR-A-01105 (Rev F) Fifth Floor Plan as Existing  4877-STA-XX-06-DR-A-01106 (Rev F) Roof Plan as Existing  4877-STA-XX-ZZ-DR-A-01121 (Rev A) North Elevation as Existing  4877-STA-XX-ZZ-DR-A-01122 (Rev A) South Elevation as Existing  4877-STA-XX-ZZ-DR-A-01123 (Rev A) East Elevation as Existing  4877-STA-XX-ZZ-DR-A-01124 (Rev A) West Elevation as Existing  4877-STA-XX-ZZ-DR-A-01125 (Rev A) Courtyard Elevation North as Existing  4877-STA-XX-ZZ-DR-A-01126 (Rev A) Courtyard Elevation East as Existing  4877-STA-XX-ZZ-DR-A-01127 (Rev A) Courtyard Elevation South as Existing  4877-STA-XX-ZZ-DR-A-01128 (Rev A) Courtyard Elevation West as Existing  4877-STA-XX-ZZ-DR-A-01132 Section 2 as Existing  4877-STA-XX-ZZ-DR-A-01133 Section 3 as Existing  4877-STA-XX-B1-DR-A-02099 (Rev A) Basement Floor Plan - Demolition  4877-STA-XX-00-DR-A-02100 (Rev A) Ground Floor Plan - Demolition  4877-STA-XX-01-DR-A-02101 (Rev A) First Floor Plan - Demolition  4877-STA-XX-02-DR-A-02102 (Rev A) Second Floor Plan - Demolition  4877-STA-XX-03-DR-A-02103 (Rev A) Third Floor Plan - Demolition  4877-STA-XX-04-DR-A-02104 (Rev A) Fourth Floor Plan - Demolition  4877-STA-XX-05-DR-A-02105 (Rev A) Fifth Floor Plan - Demolition  4877-STA-XX-06-DR-A-02106 (Rev A) Sixth Floor Plan - Demolition  4877-STA-XX-07-DR-A-02107 (Rev A) Roof Plan - Demolition  4877-STA-XX-ZZ-DR-A-02201 (Rev A) North Elevation 1 - Demolition as Proposed  4877-STA-XX-ZZ-DR-A-02202 (Rev A) East Elevation 2 - Demolition as Proposed  4877-STA-XX-ZZ-DR-A-02203 (Rev A) South Elevation 3 - Demolition as Proposed  4877-STA-XX-ZZ-DR-A-02204 (Rev A) West Elevation 4 - Demolition as Proposed</p>

	<p>4877-STA-XX-ZZ-DR-A-02205 (Rev A) Courtyard Elevation 5 North - Demolition as Proposed</p> <p>4877-STA-XX-ZZ-DR-A-02206 (Rev A) Courtyard Elevation 6 North - Demolition as Proposed</p> <p>4877-STA-XX-ZZ-DR-A-02207 (Rev A) Courtyard Elevation 7 North - Demolition as Proposed</p> <p>4877-STA-XX-ZZ-DR-A-02208 (Rev A) Courtyard Elevation 8 North - Demolition as Proposed</p> <p>4877-STA-XX-ZZ-DR-A-02302 (Rev A) Section 2 - Demolition as Proposed</p> <p>4877-STA-XX-ZZ-DR-A-02303 (Rev A) Section 3 - Demolition as Proposed</p> <p>4877-STA-XX-B1-DR-A-07099 (Rev I) Proposed Basement Floor Plan</p> <p>4877-STA-XX-00-DR-A-07100 (Rev H) Proposed Ground Floor Plan</p> <p>4877-STA-XX-01-DR-A-07101 (Rev H) Proposed First Floor Plan</p> <p>4877-STA-XX-02-DR-A-07102 (Rev H) Proposed Second Floor Plan</p> <p>4877-STA-XX-03-DR-A-07103 (Rev H) Proposed Third Floor Plan</p> <p>4877-STA-XX-04-DR-A-07104 (Rev H) Proposed Fourth Floor Plan</p> <p>4877-STA-XX-05-DR-A-07105 (Rev H) Proposed Fifth Floor Plan</p> <p>4877-STA-XX-06-DR-A-07106 (Rev H) Proposed Sixth Floor Plan</p> <p>4877-STA-XX-07-DR-A-07107 (Rev H) Proposed Roof Plan</p> <p>4877-STA-XX-XX-DR-A-07101 (Rev B) North Elevation 1 - As Proposed</p> <p>4877-STA-XX-XX-DR-A-07102 (Rev B) East Elevation 2 - As Proposed</p> <p>4877-STA-XX-XX-DR-A-07103 (Rev B) South Elevation 3 - As Proposed</p> <p>4877-STA-XX-XX-DR-A-07104 (Rev B) West Elevation 4 - As Proposed</p> <p>4877-STA-XX-XX-DR-A-07105 (Rev A) Courtyard Elevation 5 - As Proposed</p> <p>4877-STA-XX-XX-DR-A-07106 (Rev A) Courtyard Elevation 6 - As Proposed</p> <p>4877-STA-XX-XX-DR-A-07107 (Rev A) Courtyard Elevation 7 - As Proposed</p> <p>4877-STA-XX-XX-DR-A-07108 (Rev A) Courtyard Elevation 8 - As Proposed</p> <p>4877-STA-XX-099L-DR-A-07300 (Rev C) Proposed Section A-A</p> <p>4877-STA-XX-099L-DR-A-07301 (Rev A) Proposed Section B-B</p> <p>4877-STA-XX-XX-DR-A-20301 (Rev B) Façade Bay Study 01 - As Proposed</p> <p>4877-STA-XX-XX-DR-A-20302 (Rev A) Façade Bay Study 02 - As Proposed</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Drawing numbers continued:</p> <p>Supporting documents:</p>

	<p>Design and Access Statement, prepared by Stiff + Trevillion including Accessibility Statement, Schedule of Accommodation, Lighting Assessment, Waste Storage and Collection; Employment and Training Strategy, prepared by Dominus; Crime Impact Assessment, prepared by QCIC Security Assured; Economic and Social Value Statement, prepared by GC Insight; Health Impact Assessment, prepared by GC Insight; Hotel Needs Assessment, prepared by Colliers; Statement of Community Involvement, prepared by Kanda; Heritage Statement including photographs and visualisations and Views analysis, prepared by The Townscape Consultancy; Housing Study prepared by Stiff + Trevillion; Landscaping Statement, prepared by Townshend Landscape Architects; Ecology and Bat Survey, prepared by Pell Frischmann; Arboricultural Pre-Development Report, prepared by JF Tree Services; Noise Impact Assessment, prepared by Scotch Partners LLP; Air Quality Assessment, prepared by Pell Frischmann; Daylight and Sunlight Assessment, prepared by GIA; Structural Report, prepared by Elliott Wood; Sustainability Statement, prepared by Carbon. Climate. Certified.; BREEAM pre-assessment, prepared by Carbon. Climate. Certified.; Energy Statement, prepared by Applied Energy; Sustainable Drainage Systems Strategy (P02), prepared by Elliot Wood; Flood Risk Assessment (P02), prepared by Elliot Wood; Transport Assessment, prepared by Pell Frischmann; Travel Plan including a Delivery and Servicing Management Plan, prepared by Pell Frischmann, Revised Sustainability Report 'Revised (572)2449-DD-GR-Sustainability-Statement_123_Judd_Street_R02', Revised Fire Statement 'Revised R1 Issue 5 - Judd Street - Fire Statement', Revised Construction Management Plan '20250909 - CMP 123 Judd Street Rev 02 [Revised]' and SuDs response to LLFA '2240185-EWP-ZZ-XX-TN-C-0001-P01 - Response to LLFA Comments'</p>
4	<p>All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
5	<p>Prior to commencement of above ground works (other than demolition, site clearance and preparation), detailed drawings and samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <p>a) Detailed drawings, including plans, coloured elevations and sections at 1:25 of all typical new upper facade parts (including at interface with existing building, window / external door head and cill, and at roof junctions). To include any ventilation grills, screening (including plant), balustrades, parapets, gates, planters and associated elements and lighting fixtures;</p> <p>b) Detailed drawings, including plans, coloured elevation and section drawings, of the altered ground level openings at a scale of 1:25;</p>

	<p>c) Detailed drawings, including plans, coloured elevation and section drawings, of the replacement windows at a scale of 1:25;</p> <p>d) Manufacturer's specification details, including high resolution photographs, of all facing materials of the upper façade to be constructed (to be submitted to the Local Planning Authority) and samples at a minimum of 0.5m x 0.5m of those materials (to be provided on site);</p> <p>e) Once a) and d) are agreed, sample panel(s) of a typical section of the façade at 1:1 scale (minimum 2m x 2m in size), including a glazed opening, showing reveal, cill and header details and neighbouring facing materials to be installed on site for review, or at alternative pre-arranged location if necessitated by construction methodology. The extents of the panel are to be agreed with the local planning authority ahead of construction; and</p> <p>f) Detailed drawings of gates, railings, doors and louvres on all parts of buildings which face the public realm at a scale of 1:25.</p> <p>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.</p> <p>Reason: To safeguard the appearance of the buildings and the character and appearance of the area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
6	<p>No development shall be occupied until confirmation has been provided that either:</p> <ul style="list-style-type: none"> <li>• all water network upgrades required to accommodate the additional demand to serve the development have been completed; or</li> <li>• a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.</li> </ul> <p>Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.</p> <p>Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development and in accordance with policy CC4 of the 2017 Camden Local Plan.</p>
7	<p>Prior to first occupation, evidence that the development can achieve secured by design accreditation must be submitted to and approved in writing by the local planning authority in consultation with the Designing Out Crime officer.</p> <p>The relevant measures shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained.</p>

	<p>Reason: Reason: to ensure the development is safe and secure comply with policy C5 of the Camden Local Plan 2017.</p>
8	<p>Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of all biodiverse, substrate-based extensive living roofs to be incorporated into the development shall be submitted to and approved in writing by the local planning authority. The design and planting scheme should be informed by the Ecological Appraisal and should reflect the local conditions and species of interest. The details shall include the following:</p> <ul style="list-style-type: none"> <li>• detailed maintenance plan;</li> <li>• details of its construction and the materials used; and</li> <li>• a section at a scale of 1:25 showing substrate depth averaging 130mm with added peaks and troughs to provide variations between 80mm and 150mm and D. full planting details including species showing planting of at least 16 plugs per m2.</li> </ul> <p>The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the premises are first occupied. Guidance on living roofs is available in the Camden Biodiversity Action Plan: Advice Note on Living Roofs and Walls.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the Camden Local Plan 2017.</p>
9	<p>Prior to commencement of relevant works, a feasibility assessment with the aim of maximising the provision of solar photovoltaics should be submitted to the local planning authority and approved in writing. The proposals should include as a minimum the approved (no.99 panels /at least 193m2) and energy generation capacity (at least 42kWp).</p> <p>The buildings shall not be first occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.</p> <p>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 Camden Local Plan 2017.</p>
10	<p>Prior to commencement of development other than site clearance &amp; preparation, details of rainwater recycling proposals should be submitted to the local planning authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the Camden Local Plan 2017.</p>



11	<p>Prior to construction of the extension, 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) and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the Camden Local Plan 2017.</p>
12	<p>If during construction/demolition works, evidence of potential contamination is encountered, works shall cease and the site fully assessed to enable an appropriate remediation plan to be developed. Works shall not recommence until an appropriate remediation scheme has been submitted to, and approved in writing by, the local planning authority and the remediation has been completed. Upon completion of the building works, this condition shall not be discharged until a closure report has been submitted to, and improved in writing by, the local planning authority.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policies G1, D1, A1, and DM1 of the Camden Local Plan 2017.</p>
13	<p>Prior to commencement of relevant works details of 4 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.</p> <p>The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter permanently retained.</p> <p>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.</p>
14	<p>Prior to commencement of development other than site clearance &amp; preparation full details of hard and soft landscaping and means of enclosure (boundary treatments) of all un-built, open areas shall be submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: In the interests of ecological value and visual amenity in accordance with policies A2, A3, A5, D1 and D2 of the Camden Local Plan 2017.</p>

15	<p>The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with machinery operating at maximum design capacity and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the Camden Local Plan 2017.</p>
16	<p>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.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the Camden Local Plan 2017</p>
17	<p>The noise level in rooms at the development hereby approved shall meet the 'Good' noise standard specified in BS 8233 Guidance on sound insulation and noise reduction for buildings for internal rooms.</p> <p>Reason: To ensure that the amenity of occupiers of the development site are not adversely affected by noise in accordance with the requirements of policies A1 and A4 of the Camden Local Plan 2017</p>
18	<p>Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24 hour LA90, 15 mins) by more than 10 dB one metre outside any premises.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the Camden Local Plan 2017.</p>
19	<p>No development shall take place until real time dust monitors appropriate to the dust risk have been installed.</p> <p>Prior to installing monitors, full details of the air quality monitors shall be submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance; a confirmation email should be sent to <a href="mailto:airquality@camden.gov.uk">airquality@camden.gov.uk</a> no later than one day after the monitors have been installed with photographic evidence in line with the approved details.</p>

	<p>Prior to commencement of works, 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.</p> <p>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.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the Camden Local Plan 2017.</p>
20	<p>The emergency plant and generators hereby permitted may be operated only for essential testing, except when required by an emergency loss of power.</p> <p>Reason: To ensure that the amenity of occupiers of the development site are not adversely affected by noise in accordance with policies A1 and A4 of the 2017 Local Plan.</p>
21	<p>Testing of emergency plant and generators hereby permitted may be carried out only for up to one hour in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.</p> <p>Reason: To ensure that the amenity of occupiers of the development site are not adversely affected by noise in accordance with policies A1 and A4 of the 2017 Local Plan</p>
22	<p>The development shall achieve an Urban Greening Factor Score of at least 0.23 prior to first occupation and shall thereafter be maintained and retained to achieve this score in perpetuity in accordance with approved document: Biodiversity Gain Plan and Urban Greening Factor Review 147523.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity, character and biodiversity of the area in accordance with the requirements of policies A2, A3 and D1 of the Camden Local Plan 2017 and policy G5 of the London Plan 2021.</p>
23	<p>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.</p>

	<p>Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.</p>
24	<p>Prior to the commencement of the use hereby permitted, details of waste and recycling storage for the development shall be submitted to and approved in writing by the local planning authority. The waste and recycling storage shall be provided in accordance with the approved details prior to the commencement of the use hereby permitted and shall thereafter be retained solely for its designated use.</p> <p>Reason: To ensure suitable provision for the occupiers of the development, to encourage the sustainable management and collection of waste, and to safeguard the visual amenity of the area in accordance with policies A1, A4, D1, CC5 of the Camden Local Plan 2017.</p>
25	<p>Prior to first occupation full details of flood protection measures including a flood door at the basement entrance to prevent flooding caused by sewer surcharge and in a 1 in 100 flood event plus climate change. Details 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.</p> <p>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.</p>
26	<p>The sustainable drainage system as approved in 2240185-EWP-ZZ-XX-TN-C-0001-P01 (the technical note submitted response to comments), 2240185-EWP-ZZ-XX-C-RP-000002 Flood Risk Assessment-P02 and 2240185-EWP-ZZ-XX-C-RP-000001 Sustainable Drainage Strategy-P02 shall be installed as part of the development to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water and to achieve [a maximum runoff rate restriction for the entire site of 46.1 l/s, from which 1.81 l/s is proposed for the new roof and basement area]. The system shall include a blue/green roof and raised planters, with 107.2m<sup>3</sup> of attenuation being provided by the blue roof and 5m<sup>3</sup> attenuation from the basement tank, as stated in the approved drawings and shall thereafter retained and maintained in accordance with the approved maintenance plan.</p> <p>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 Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>

27	<p>Prior to first occupation, evidence that the sustainable drainage 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.</p> <p>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 Camden Local Plan 2017.</p>
28	<p>No part of the roof of the building shall be used as a roof terrace or other form of open amenity space. No alterations shall be carried out; nor planters or other chattels placed on the roofs. No railings or other means of enclosure shall be erected on the roofs, and no alterations shall be carried out to any elevation of the application property to form access onto the roofs.</p> <p>Reason: In order to protect the existing residential amenities of the occupiers of neighbouring properties in accordance with the requirements of policies A1 and D1 of the Camden Local Plan 2017.</p>
29	<p>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 (excluding the west elevation that faces the service yard)</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
30	<p>Prior to first occupation, a lighting strategy for all areas of external artificial lighting shall be submitted to and approved in writing by the local planning authority. Lighting contours shall be submitted to demonstrate that the vertical illumination of neighbouring premises is in accordance with the recommendations of the Institution of Lighting Professionals in the 'Guidance Notes for the Reduction of Obtrusive Light'. Details should also be submitted for approval of measures to minimise use of lighting and prevent glare and sky glow by correctly using, locating, aiming and shielding luminaires.</p> <p>Such strategy shall be developed with input from a specialist lighting engineer accredited by the Institute of Lighting Engineers and shall incorporate (inter alia) consideration of the impact of the lighting design on the needs of wildlife (including bats), contributing to reducing crime, residential properties, maintainability, whole life cost and energy use and impact on the adjacent Sites of Important Nature Conservation.</p> <p>The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the premises are first occupied.</p>

	<p>Reason: To maintain a high quality of amenity and a safe environment as well as improving nature conservation in accordance with Policies D1 and A3 of the Camden Local Plan 2017.</p>
31	<p>The use of the ground floor as a restaurant/bar, and café for the public shall not be carried out outside the following times:</p> <p>Restaurant and bar  6:30am - 11.30pm Mondays to Thursdays  7:00am – midnight Friday and Saturday  7:00am – 10:30pm Sundays</p> <p>Cafe  7:00am - 5:00pm Mondays to Sundays</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1, A4 and TC1, TC2 and TC4 of the Camden Local Plan 2017.</p>
32	<p>The development shall be constructed in accordance with, and at all times occupied and managed in strict compliance with, the approved Revised Fire Statement 'Revised R1 Issue 5 - Judd Street - Fire Statement' dated 16/10/2025</p> <p>Reason: In order to provide a safe and secure development in accordance with Policies D5 and D12 of the London Plan 2021.</p>
33	<p>Prior to first occupation of the building the following cycle parking as shown on the approved plan: 4877-STA-XX-00-DR-A-07100 (Rev H) shall be provided in their entirety:</p> <ul style="list-style-type: none"> <li>• 22 Long stay spaces</li> <li>• 31 Short stay spaces</li> </ul> <p>All such facilities shall thereafter be permanently maintained and retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Policies T1 and T2 of the Camden Local Plan 2017.</p>
34	<p>The development hereby permitted shall not commence until the following documents (in consultation with London Underground) have been submitted to and approved in writing by the local planning authority:</p> <p>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.</p>

	Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
35	<p>Prior to the commencement of use of the hotel, there shall be the provision of 24 (10%) fully wheelchair accessible rooms.</p> <p>Reason: To ensure that the internal layout of the building makes sufficient provision for the needs of people with disabilities in accordance with the requirements of policy D5 of the London Plan 2021 and Policy C6 of the London Borough of Camden Local Plan 2017.</p>

## 27. INFORMATIVES

1	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
2	<p>Biodiversity Net Gain (BNG) Informative (1/3):</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:</p> <p>(a) a Biodiversity Gain Plan has been submitted to the planning authority, and</p> <p>(b) the planning authority has approved the plan.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this will not require the approval of a BGP before development is begun because 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).</p>

3	<p>Biodiversity Net Gain (BNG) Informative (2/3):</p> <p>+ Summary of transitional arrangements and exemptions for biodiversity gain condition</p> <p>The following are provided for information and may not apply to this permission:</p> <ol style="list-style-type: none"> <li>1. The planning application was made before 12 February 2024.</li> <li>2. The planning permission is retrospective.</li> <li>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.</li> <li>4. The permission is exempt because of one or more of the reasons below: <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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).</li> <li>- The application is a Householder Application.</li> <li>- It is for development of a "Biodiversity Gain Site".</li> <li>- 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).</li> <li>- It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).</li> </ul> </li> </ol>
4	<p>Biodiversity Net Gain (BNG) Informative (3/3):</p> <p>+ Irreplaceable habitat:</p>

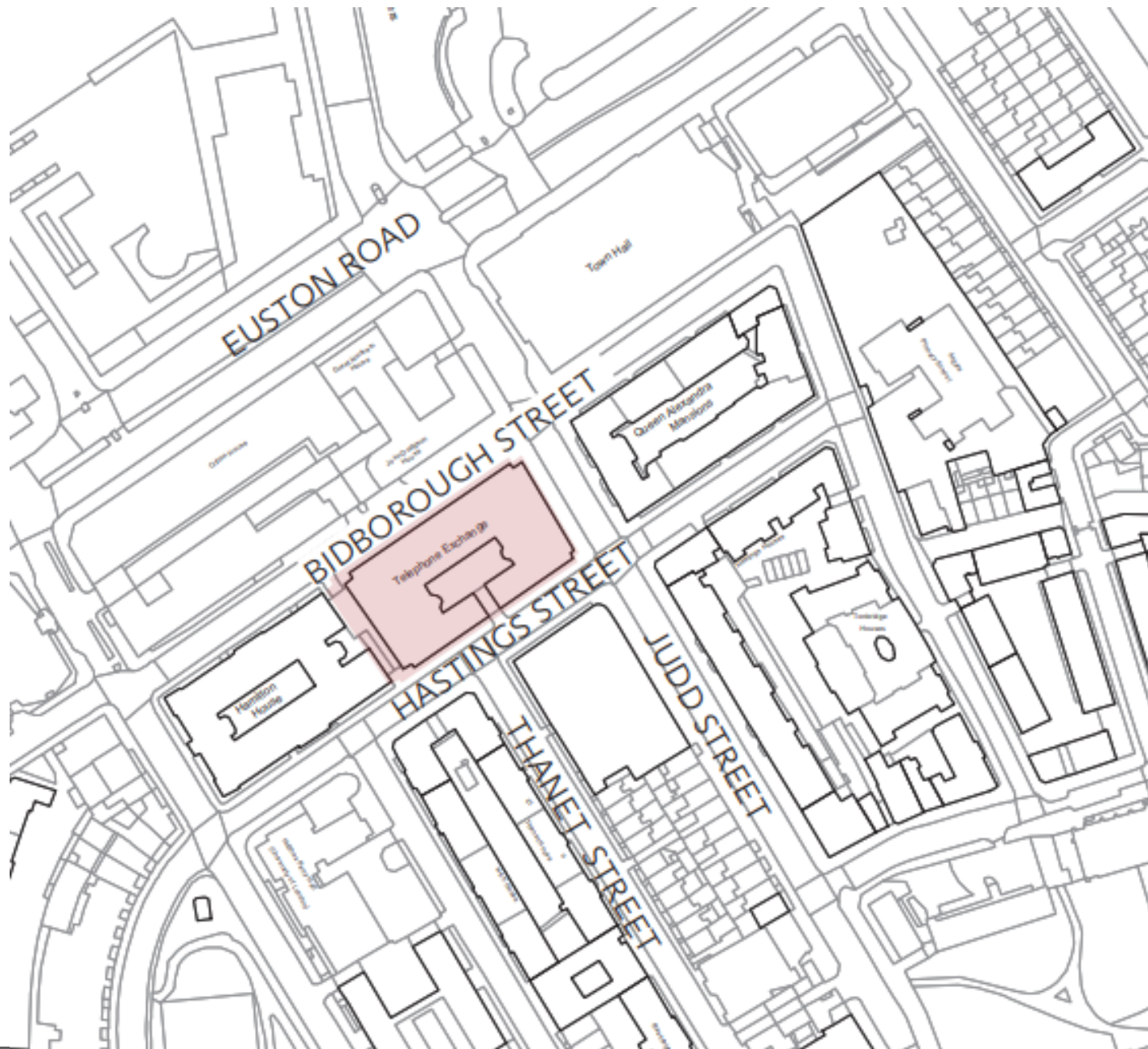


	<p>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p> <p>+ The effect of section 73(2D) of the Town &amp; Country Planning Act 1990</p> <p>If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>+ Phased development</p> <p>In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</p>
5	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
6	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at <a href="http://www.camden.gov.uk">www.camden.gov.uk</a>) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p>

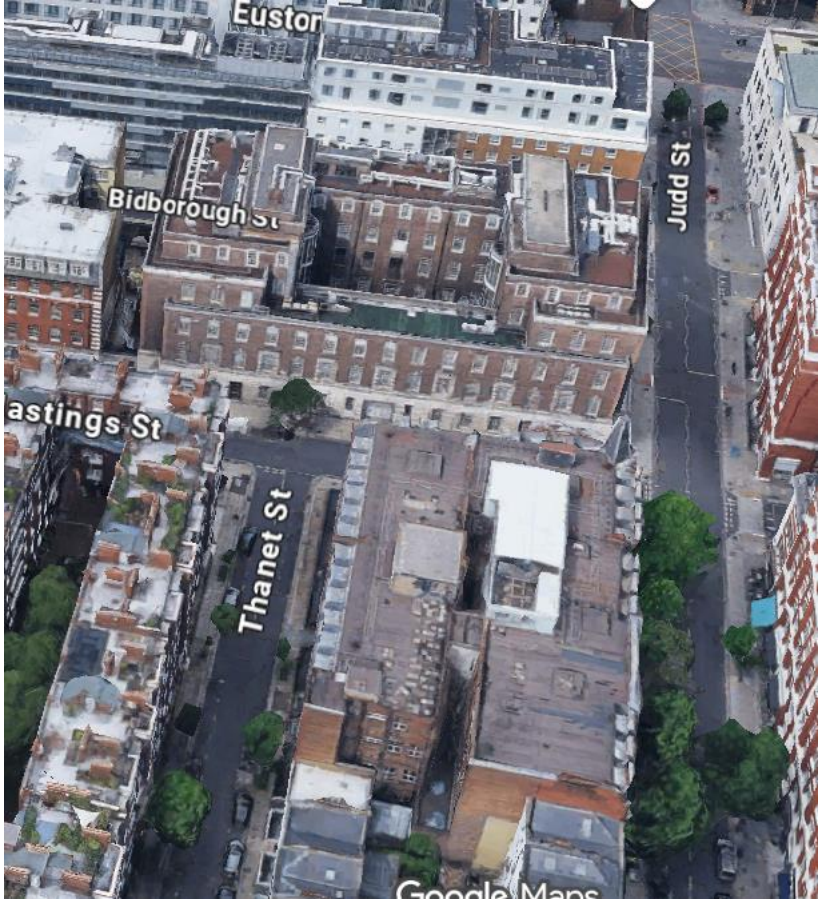
	Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.
7	The Council supports schemes for the recycling of bottles and cans and encourages all hotels, restaurants, wine bars and public houses to do so as well. Further information can be obtained by telephoning the Council's Environment Services (Recycling) on 0207 974 6914/5 or on the website <a href="http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en">http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en</a> .
8	You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at <a href="https://beta.camden.gov.uk/web/guest/construction-management-plans">https://beta.camden.gov.uk/web/guest/construction-management-plans</a> or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.
9	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.
10	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, <a href="http://www.camden.gov.uk/planning">www.camden.gov.uk/planning</a> or the Camden Contact Centre on Tel: 020 7974 4444 or email <a href="mailto:env.devcon@camden.gov.uk">env.devcon@camden.gov.uk</a> .

# 2025/3810/P

123 Judd Street, London,  
WC1H 9NP



# Aerial views of the site



# Photos of site



# Photos of site



• Courtyard with plant equipment, vents from basement & parking

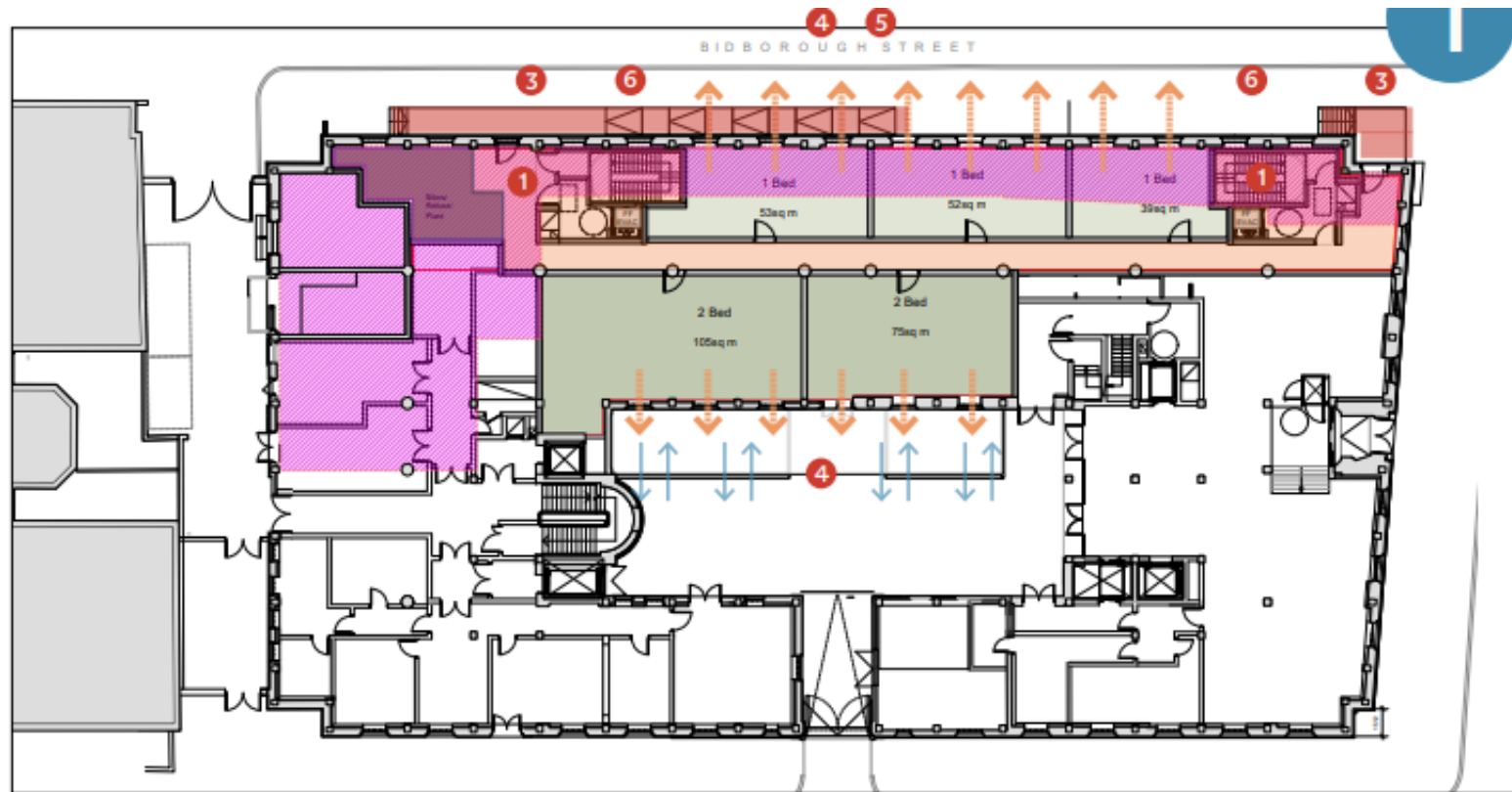


+ Level/ ramped access to GF areas and general plant equipment / external services



+ General unsightly plant equipment / external services

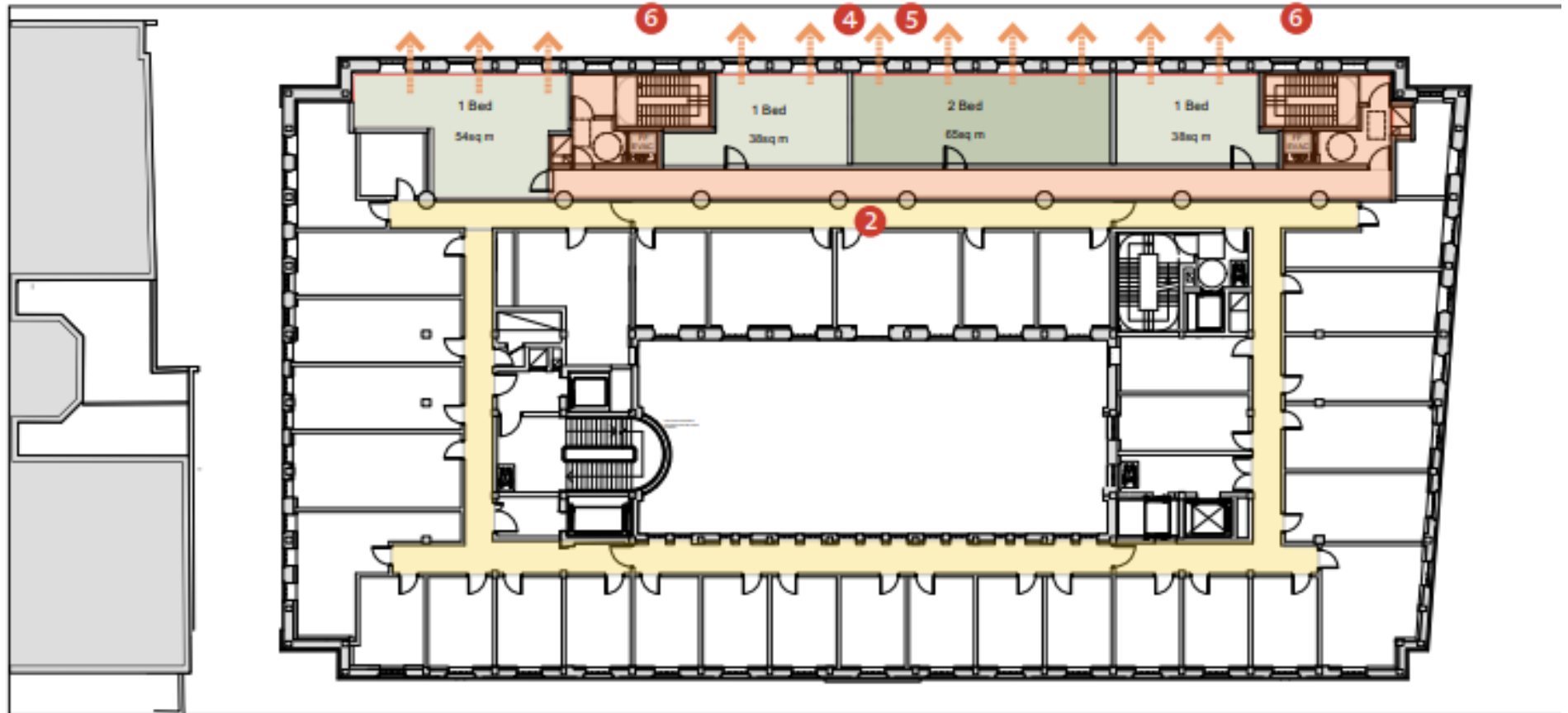
# Residential study – option 1



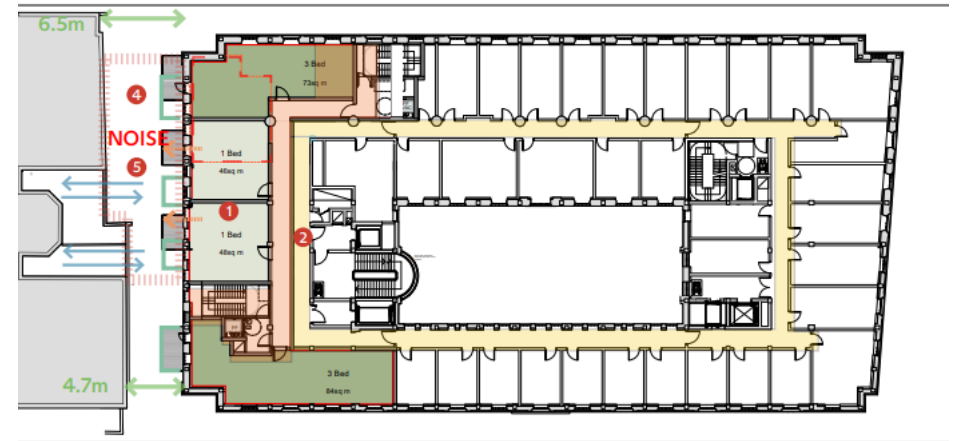
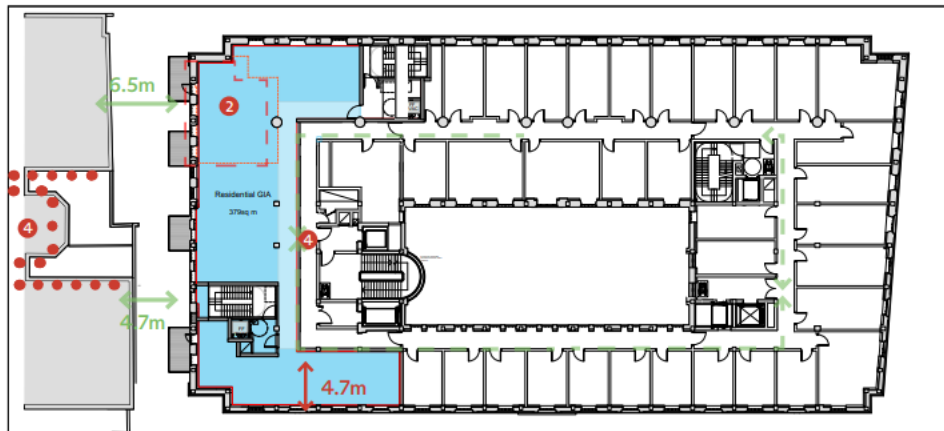
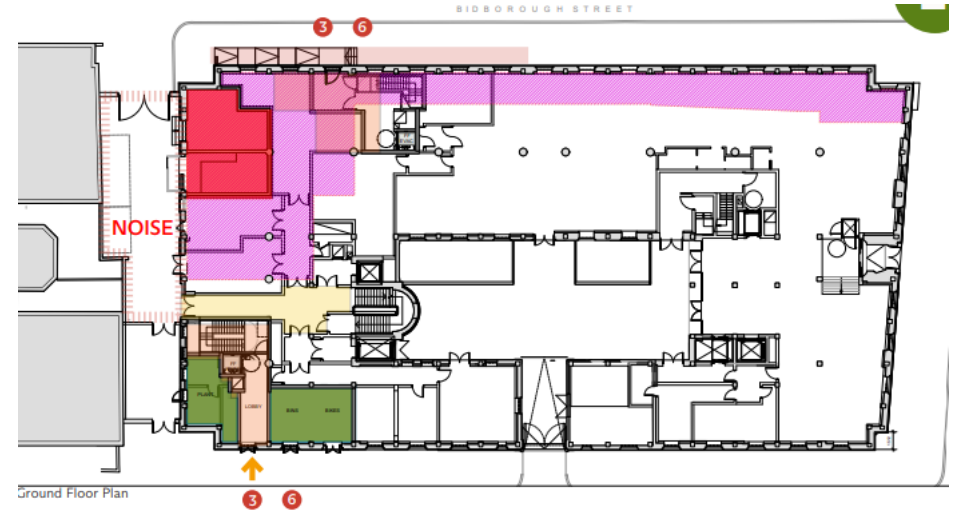
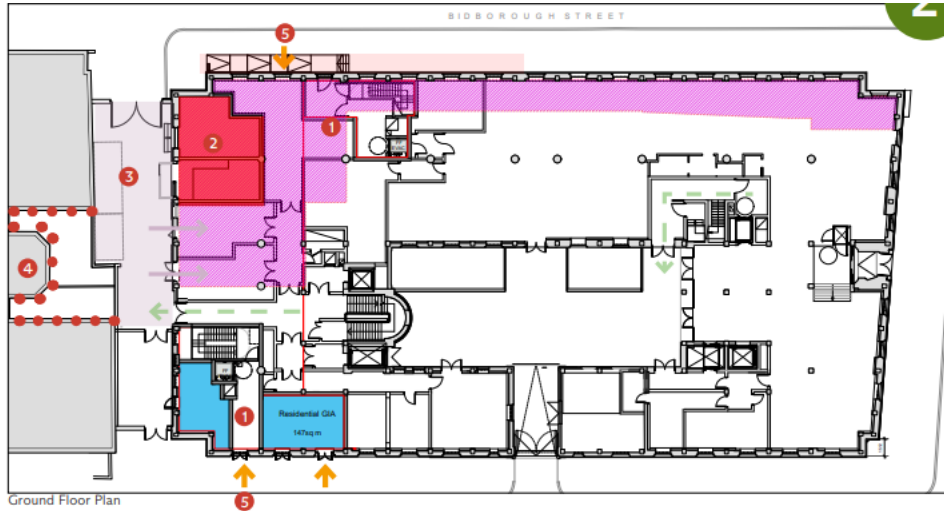
Ground Floor Plan



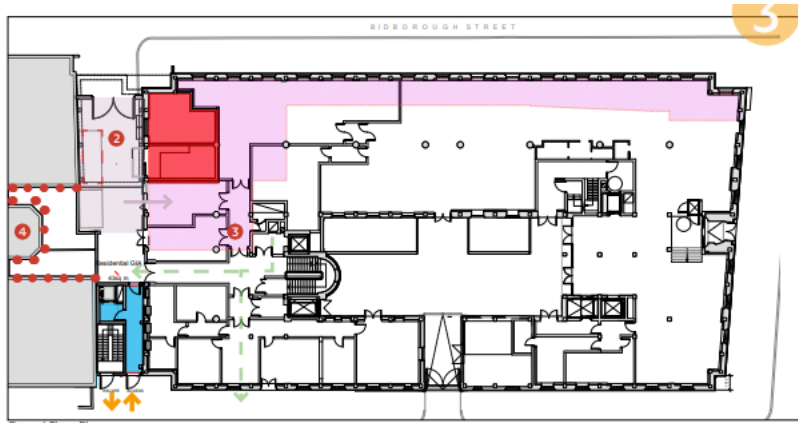
# Residential study – option 1



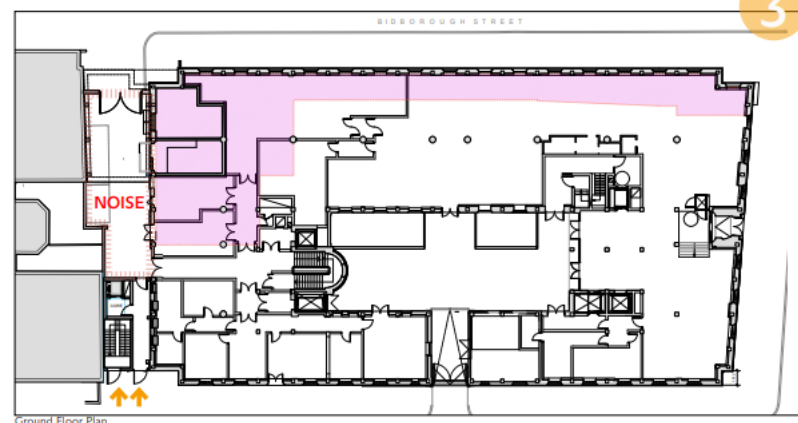
# Residential study – option 2



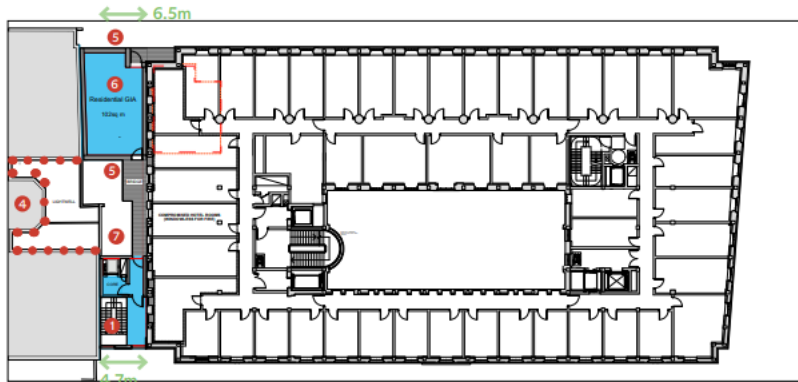
# Residential study – option 3



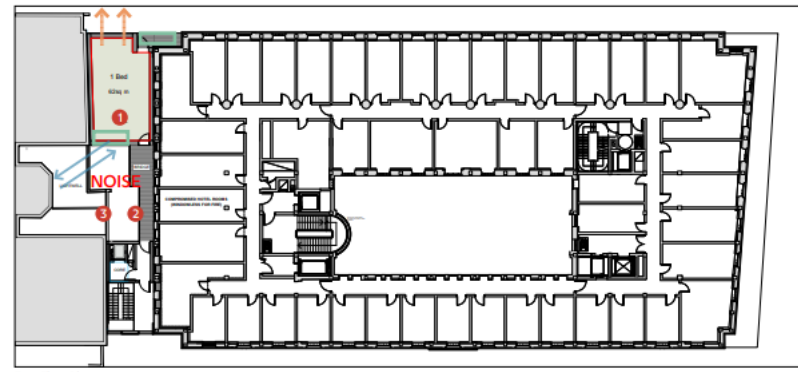
Ground Floor Plan



Ground Floor Plan






First Floor Plan



First Floor Plan

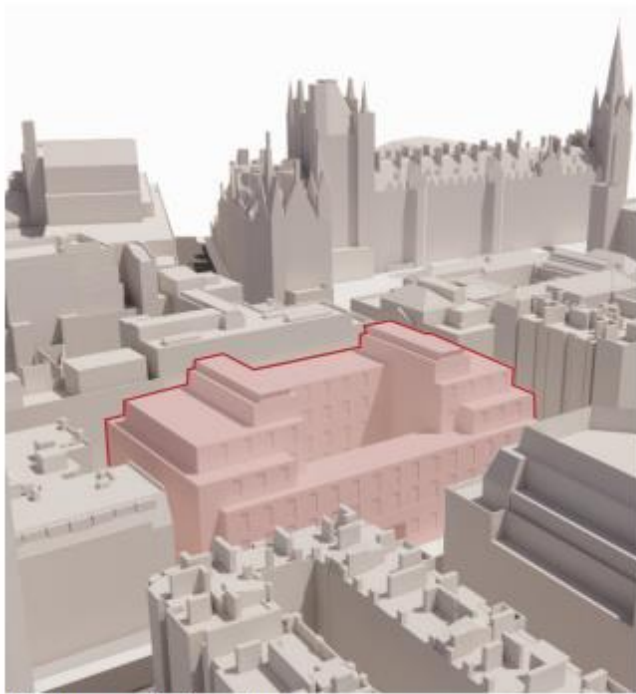
# Massing principles

Massing proposals align with principles of Classical proportions defined in existing building.

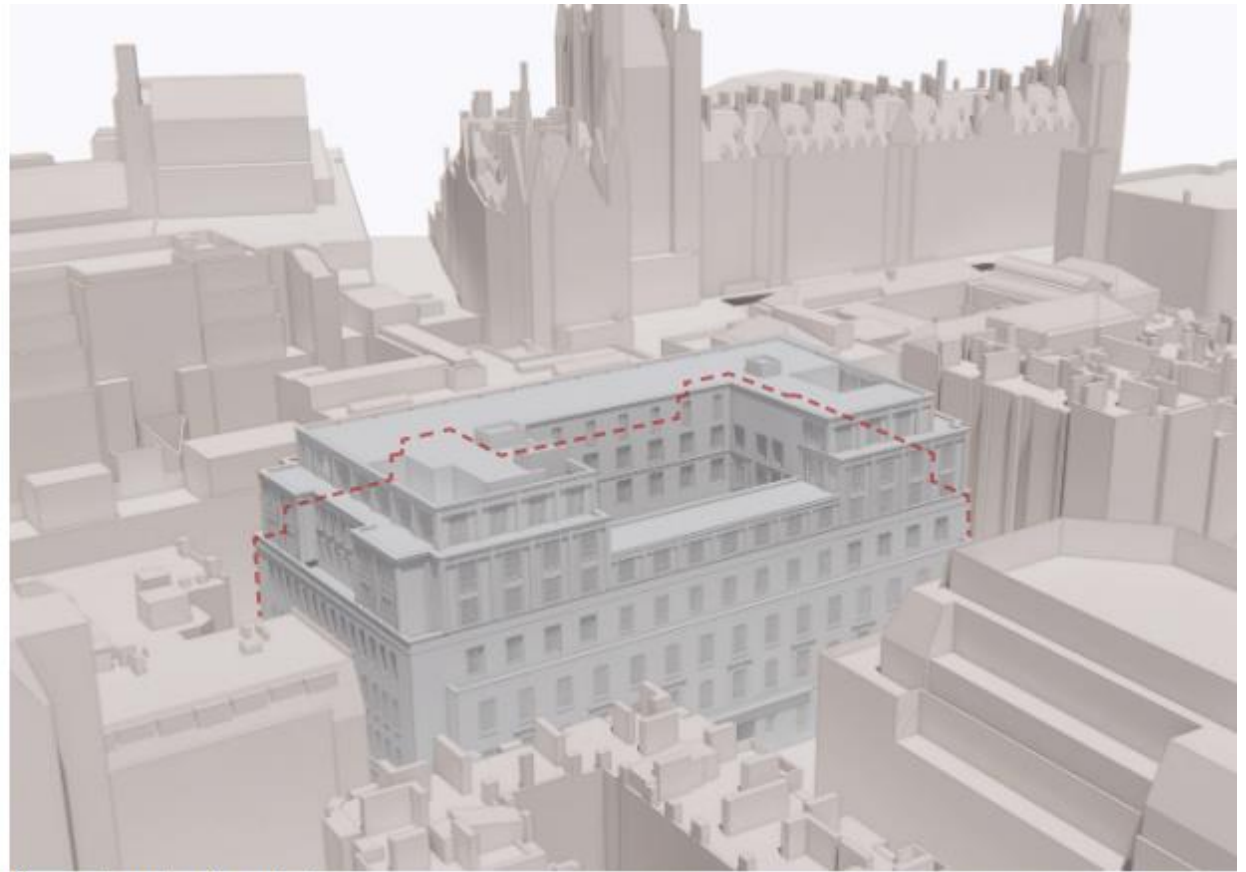
-  Proportions of corner blocks on existing building
-  Existing proportions applied to proposed extensions
-  Recessive upper storeys



# Existing and proposed massing



Existing massing in context



Proposed massing in context



Birdseve from South East



Birdseve from North West

# Key local views



# Key local views





# Key local views



# Key local views



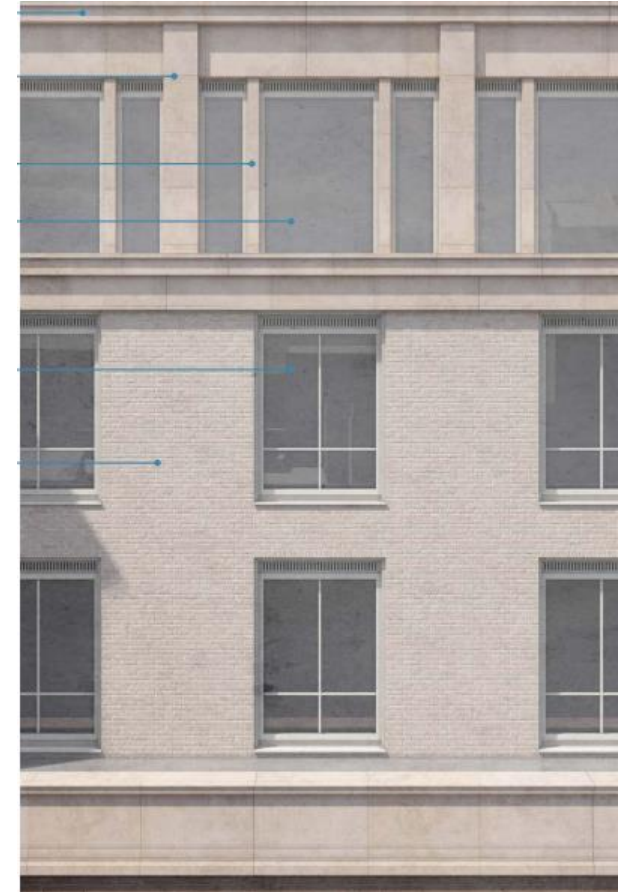
# Key local views



# Detailed designs and bay features 1



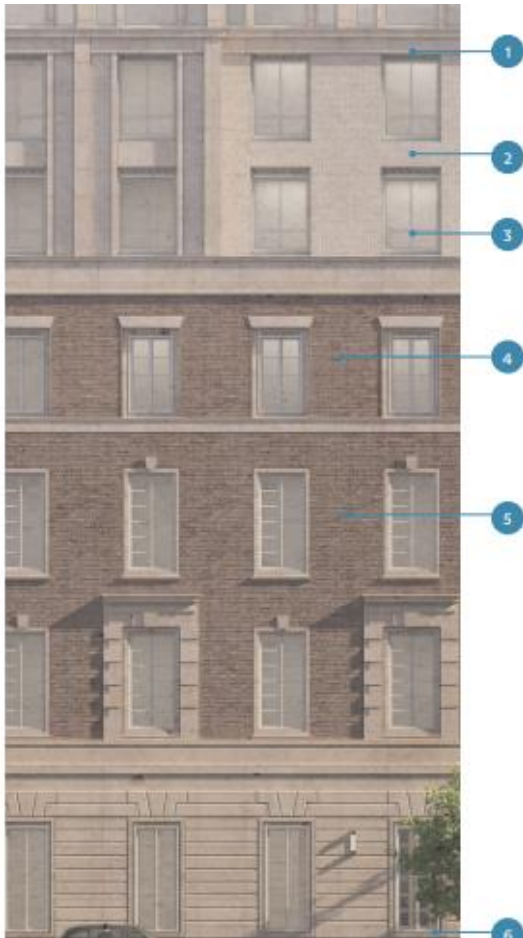
L05 & 06 North courtyard elevation



# Detailed designs and bay features 2



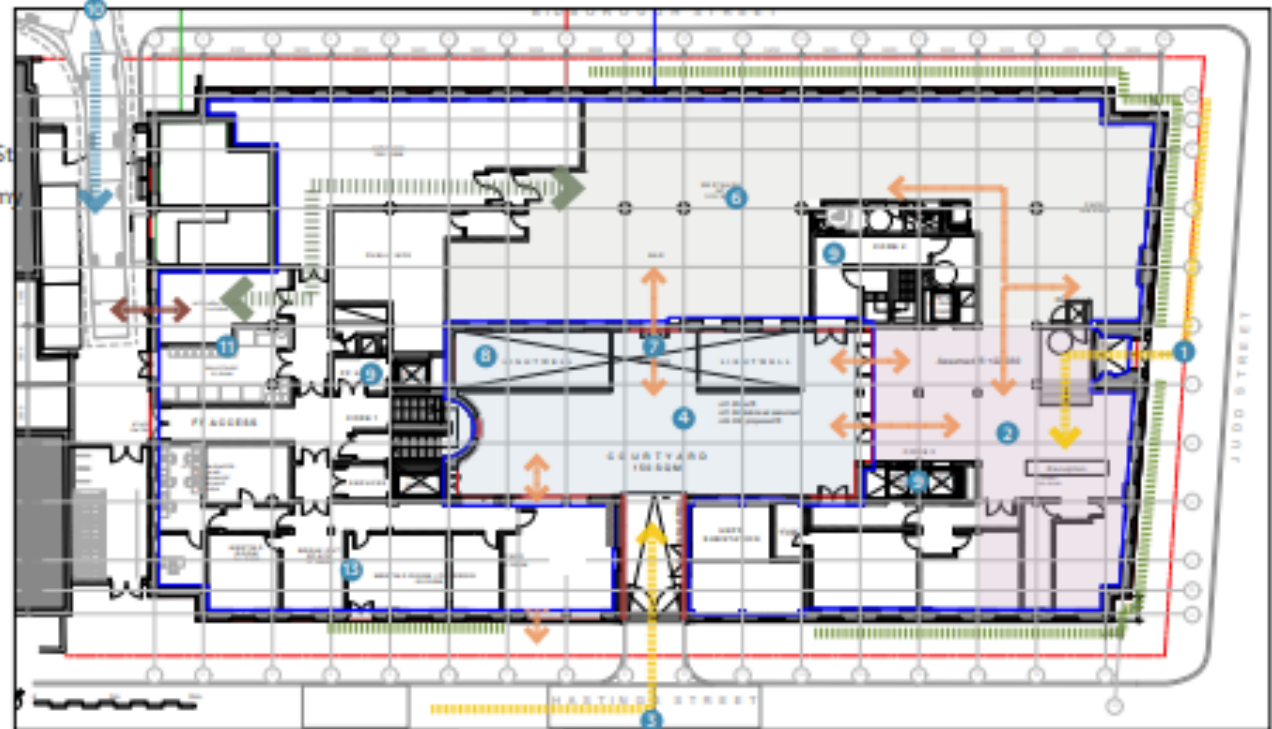
# Material palette



- 1 Re-constituted 'stone', Techcrete or similar finish for facade detailing & window surrounds
- 2 Linear European brick proportion laid Flemish bond as existing - creamy white colour - Mortar colour - light tone - sample image above is UK-Brick Whitchurch FF Format (or similar approved)
- 3 Off white, metallic finish PPC window framing - RAL 9001 or similar TRC
- 4 Existing reclaimed bricks used for infill sections of facade - treated to blend with existing brickwork following cleaning
- 5 Existing facade - cleaned and made good
- 6 Existing stonework made good (to match) where GF window sills are lowered
- 7 Existing granite plinth cleaned and made good
- 8 Granite details used around new openings in

# Ground Floor – activation and use

- ① Main Entrance at grade off Judd St
- ↔ ② Arrivals Lounge linking courtyard & F&B
- ③ Pick Up Drop Off - level access to courtyard
- ④ Courtyard Amenity with links to F&B & reception
- ⑤ F&B Coffee accessed from courtyard & Hastings St with links to adjacent Camden Hospitality Academy training facilities
- ⑥ F&B Restaurant & Bar
- ⑦ Wide bridge link between courtyard & restaurant
- ⑧ Lightwell formed for daylight to basement rooms
- ⑨ Core arrangements open up GF arrangement & delivery efficient circulation on upper floors
- ⑩ Service yard accessed via Bidborough St with shared access for BT
- ⑪ BOH areas adjacent to service yard
- ⑫ FOH/ BOH servicing connection
- ||||| Sill levels dropped for visual connection to street
- ⑬ Camden Hospitality Academy



# Courtyard design and views



View North over bridge to restaurant



View East towards reception area



View West



# Indicative floorplan

