

Address:	120 Holborn London EC1N 2TD		4
Application Number(s):	2025/2446/P	Officer: Adam Greenhalgh	
Ward:	Holborn and Covent Garden		
Date Received:	06/06/2025		
Proposal:	Extensions and alterations including: removal of rooftop plant and the addition of an additional storey on the west side (adjacent to Leather Lane) and the retention of 10 storeys, with rooftop plant and terraces atop on the east side (Holborn/Hatton Garden). Facade renewal (replacement of stone cladding with metal cladding and replacement window (bays), provision of new balconies on Holborn Circus elevation. Reconfigurations to provide extended commercial and retail floorspace (Class E) on the ground floor and to re-provide affordable jewellery workspace and competitive socialising (sui generis)/Class E space on the lower ground floor. Reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.		
Background Papers, Supporting Documents and Drawing Numbers: Existing Drawings: 05001, 05098, 05100, 05110, 05081, 05099, 05101, 05201, 05302, 05301, 05107, 05303, 05203, 05202, 05204, 05907, 06401 Proposed Drawings: 06080, 06097, 06098, 06099, 06100, 06101, 06102, 06106, 06108, 06109, 06110, 06201, 06202, 06203, 06204, 06301, 06302, 06303 Landscaping Drawings - 3653-PLA: 00-00-DR-L-001 P03, 01-00-DR-L-001 P05, 09-00-DR-L-003 P03, 10-00-DR-L-004 P03 Town Planning Statement, prepared by Newmark UK, Design and Access Statement, prepared by Morris + Company; Air Quality Assessment, prepared by Aether (Revision 02 - 02/06/2025); BREEAM Pre-Assessment, prepared by Greengage; BNG and Ecology Report (and Ecology Note), Biodiversity Net Gain Metric prepared by Greengage; Crime Impact Assessment, prepared by QCIC; Daylight, Sunlight, Overshadowing and Glare Assessment, prepared by Point 2; Energy Statement, prepared by Greengage (October 2025); GLA Carbon Reductions Spreadsheet (October 2025); Sustainability Statement, prepared by Greengage; Whole Life Carbon Assessment, prepared by Greengage; Whole Life Carbon Assessment Addendum & Spreadsheet, prepared by Greengage; Flood Risk Assessment, prepared by Webb Yates; Fire Statement, prepared by The Fire Surgery; Townscape, Visual Impact and Built Heritage Assessment (Including Local and LVMF			

Views), prepared by Tavernor Consultancy; Landscaping Statement, prepared by Planit; Noise Impact Assessment, prepared by Quantum; Construction/Demolition Management Plan Pro-Forma; Outline Construction Management Plan, prepared by Caneparo; SuDS Strategy, prepared by Webb Yates; Structural Report, prepared by Webb Yates; Statement of Community Involvement, prepared by Kanda; Travel Plan, prepared by Caneparo; Transport Assessment, prepared by Caneparo; Delivery, Servicing and Waste Management Plan, prepared by Caneparo; Utilities and Foul Sewage Assessment, prepared by Webb Yates, Life Safety Generator Flue Location; Future District Heating Connection 1312-GDM-XX-XX-DR-M-6411, Thermal Comfort Assessment, prepared by Greengage (October 2025)

RECOMMENDATION SUMMARY:

Grant conditional Planning Permission subject to Section 106 Legal Agreement

Applicant:

United Ventures Investments (HI) PTE Ltd

Agent:

Newmark
One Fitzroy
W1T 3JJ

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Class E (offices)	Offices	21,647	23,805	+ 2,158
Sui-Generis/Class E	Competitive socialising/'Hub'	1,733	2,898	+ 1,165
Class E	Retail/cafe	4,596	1,863	- 2,733
Sui-Generis	Public house	800	800	0
Class E	Jewellery workspace	0	591	+ 591
Total	All uses	28,776	29,957	+ 1,181

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car – Residential (off-site)	22	22	0

Car – Commercial (off-site)	4	4	0
Car - Disabled accessible	0	2	2
Total	26	28	2
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – commercial long stay	160	381	221
Cycle – short stay (all uses)	0	6	6
Total	160	387	227

EXECUTIVE SUMMARY

- i) The site occupies a prominent location in the Hatton Garden character area. It is located between Leather Lane and Hatton Garden at Holborn Circus. It is in the Holborn Vision Area.
- ii) The site comprises a large part 7/8 storey/part 10 storey 1960's Richard Seifert office building and it has shops and a public house on the ground floor. These are set back from the pavement with travertine clad columns along Leather Lane and Holborn forming an approximately 4m wide colonnade. The upper floors are glazed on the west side and glazed and clad on the east side.
- iii) The proposal is to undertake extensions and alterations to improve the functionality, efficiency/sustainability of the building, and amenity for users (and visitors). On the west side the existing eighth storey plant will be replaced with a new eighth storey of offices and a new part nine storey added.
 - o. On the east side the building will remain at ten storeys however the top floor will be rebuilt to provide new plant enclosures and terraces. On the street facing elevations the under-performing granite clad facades will be replaced with red coloured metal cladding and the formation of 9m wide window/clad bays rather than the existing 3m wide arrangements. New balconies will be formed on the Holborn Circus elevation. Floor-space wise, the ground floor will be 'brought forward' to align with the pavement and new shopfronts formed. In the basement a large unit of affordable jewellery workspace will be provided and there will be 'flexible' commercial 'Hub' space within the centre of the building on the ground and lower ground floors. There will be a reconfiguration/enlargement of the existing entrance to the building off Holborn Circus together with the provision of upgrades to the space in front of the building with new paving, planting and seating being provided.
- iv) The additional office floorspace and ground and lower ground floor retail, commercial 'Hub' and affordable jewellery workspace would be in accordance with the Local Plan policies for economic growth and the enhancement and provision

of office and retail uses in the Central Activities Zone. Policy E2 of the Local Plan requires 50% of new employment floorspace (above 200 sqm) in Hatton Garden to be affordable jewellery workspace. 591 sqm (50%) of the proposed additional floorspace is to be for affordable jewellery workspace. The Inclusive Economy Team considers that the proposal to provide the affordable jewellery workspace at 50% of market rents in perpetuity (to be secured by a S106 agreement) is acceptable.

- v) The scheme has been the subject of six meetings with the Council's Planning and Urban Design Officers and a Chair's review by the Design Review Panel (DRP). The DRP was held in March 2025 when the Panel offered broad support for the proposal to refurbish and extend the existing building, which creates an opportunity to improve its contribution to the conservation area. The proposal to retain the vast majority of the existing structure is commended and the additional massing and façade alterations were supported in principle. The Panel advised that the cladding should be subservient to the Grade II* listed Waterhouse Square. The improvements to the public realm at the junction with Hatton Garden are positive, and bringing the building line out to the colonnade at the ground floor works well and will help create a more engaging frontage. A clear relationship between the public realm and retail uses at the ground floor was advised.
- vi) In urban design terms, the proposals meet the requirements of Local Plan policy D1 (Design) in terms of respecting local context and character and improving the perception and use of the public realm. They preserve the significance of the neighbouring Listed building(s) and the Hatton Garden Conservation Area and are sustainable in design and construction, sustaining the multifarious use of the building and facilitating a more 'sustainable' use and operation of the building. There would be no noticeable effects on the LVMF protected views within which the site sits and the appearance and legibility of the streetscenes would be preserved by way of the vibrant design of the building and the provision of high quality landscaping and public realm improvements.
- vii) The site is prominent in the Hatton Garden Conservation Area and it sits next to the Grade II* Listed Waterhouse Square. The development proposals focus on the elevations onto Holborn and the southern ends of Hatton Garden and Leather Lane. The remodelling of the elevations and extensions and landscaping at roof level would not harm the more traditional nature of the Conservation Area along Leather Lane or Hatton Garden. The Townscape and Visual Assessment shows that the views of the Listed Waterhouse Square building, and particularly the distinctive central tower, would not be impaired from any public vantage points. Historic England and the Council's Conservation and Design teams have called for a planning condition to control the appearance of the cladding and this is attached accordingly.
- viii) No neighbouring occupiers would be unduly affected in terms of loss of light, privacy or outlook. Daylight and sunlight levels at the neighbouring flats and amenity spaces would not be significantly reduced and the siting of the development would be such that the aspect from the residential properties in the surrounding area would not be significantly harmed.

- ix) Subject to a Servicing & Delivery Management Plan, Construction Management Plan and contributions to off-site cycling, highway works and pedestrian improvements in the area (all to be secured in a S106 agreement), the development would not prejudice the transport infrastructure.
- x) The S106 agreement would also secure the provision of appropriate employment and training contributions and a carbon off-set contribution to the equivalent zero carbon technologies in the Borough.
- xi) Officers conclude that the proposals accord with the policies of the Development Plan as a whole and that subject to the recommended conditions and planning obligations set out below, planning permission should be granted.

OFFICER REPORT

Reason for Referral to Committee:

Major development involving the provision of more than 1,000 sqm of non-residential floorspace (Clause 3(i)); and subject to the completion of a legal agreement for matters which the Director of Economy, Regeneration and Investment does not have delegated authority (Clause 3(iv)).

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Town Centre (TC)	Central London Area
Conservation Area	Hatton Garden
LVMF views	Parliament Hill to St Paul's Primrose Hill to St Paul's
PTAL (Public transport accessibility)	6b
Underground development constraints and considerations	<ul style="list-style-type: none">- Archaeology (Tier II)- Subterranean (groundwater) flow- Slope stability- TfL red route

Table 1 - Site designations and constraints

Description

- 1.2 The site is located on the north side of Holborn on the north west of the Holborn Circus junction. It sits between Hatton Garden to the east, which forms the northern spoke of the Holborn Circus junction, and Leather Lane, to the west. The site sits within the Holborn Vision area developed by the London Borough of Camden in line with We Make Camden strategies.
- 1.3 It comprises a part 8, part 10 storey commercial building with a range of commercial units and office entrances/office access etc on the ground floor and offices above. It has a lower ground floor which extends under the entire building and the adjoining site to the north and a basement below (under the footprint of the building).
- 1.4 The lower ground floor includes a leisure use (Bounce). This operates pursuant to planning permission 2014/2782/P (see 'Planning History' below) when it was classified as a Class D2 use under the pre 2020 Use Classes Order.

- 1.7 The ground floor comprises retail and food/drink uses (incl. the public house on Leather Lane) and the office entrances/reception areas. The upper floors comprise offices.
- 1.8 The existing building, which was built in the 1960's is eight storeys in height on its western side (at and along the junction with Leather Lane) and ten storeys in height along Holborn and Hatton Garden.



- 1.9 The building extends to the highway (pavement) on Leather Lane, Holborn and Hatton Garden. The ground floor is set back (on Leather Lane and Holborn) behind colonnades which have columns abutting the pavement. The site includes the public house on the ground floor of the building on Leather Lane.
- 1.10 In front of the building at the Holborn / Hatton Garden is a circa. 150 sq m triangle of external paved/hard landscaped space. Steps and a ramp up from this space lead to the main entrance to the building in the Holborn / Hatton Garden façade. This external space essentially comprises only paving and small trees. The stretch of building along Hatton Garden is also colonnaded on the ground floor.
- 1.11 The building is somewhat U-shaped in plan form with its 8 storey part extending along Leather Lane and part of Holborn and it being predominantly 10 storeys in height along Holborn and Hatton Garden. Both parts of the building have an additional level of 'set-back' plant on their roofs.

- 1.12 To the rear, within the 'U', the building is two storeys in height (basement and ground floor). This part takes the form of a rear courtyard and it is separated from the adjoining housing estate to the north by a high wall.
- 1.13 The site is located within the Hatton Garden Conservation Area and it sits next to three other neighbouring conservation areas: Bloomsbury, Chancery Lane and Smithfield. The existing building itself is not listed. It is not noted in the Hatton Garden Conservation Area Appraisal as making a positive or negative contribution to the Conservation Area.
- 1.14 There are several listed buildings in the surrounding area, including the Grade II* Listed Waterhouse Square building immediately to the west of the site, on the other side of Leather Lane, St. Etheldreda's RC Church (Grade I) in Ely Place, at 5, 19, 20, 21, 31 and 43 Hatton Garden (Grade II) and the Bourne Estate, Leather Lane to the north. There are also Listed buildings on the other (south) side of Holborn in the City of London.
- 1.15 The surrounding area contains predominantly retail, office and residential uses. The site is adjoined to the north by the Gamages Estate, a housing estate which has commercial uses at ground floor level and residential accommodation up to 13th floor level above. On the west (Leather Lane) side the site is adjoined by the 13 storey Vesage Court which has rear, east facing windows facing the site. On the east (Hatton Garden) side the site is adjoined by the 8 storey Jeygrove Court which has rear, west facing windows facing the site.



1. Vesage Court
2. Jeygrove Court

Application site (dark blue); Vesage Court (1); Jeygrove Court (2)

- 1.16 The Gamages Estate has a substantial central communal square which is separated from the application site by a high wall.
- 1.17 The site has 'excellent' public transport connections, with a Public Transport Accessibility Level ('PTAL') of 6b. Chancery Lane underground station is

located approximately 320 metres to the west of the site and is served by the Central Line. Farringdon Station, comprising underground, Elizabeth line and mainline rail links is located approximately 480 metres to the north-east of the site. In addition, the Site is served by a number of bus stops that are also close by.

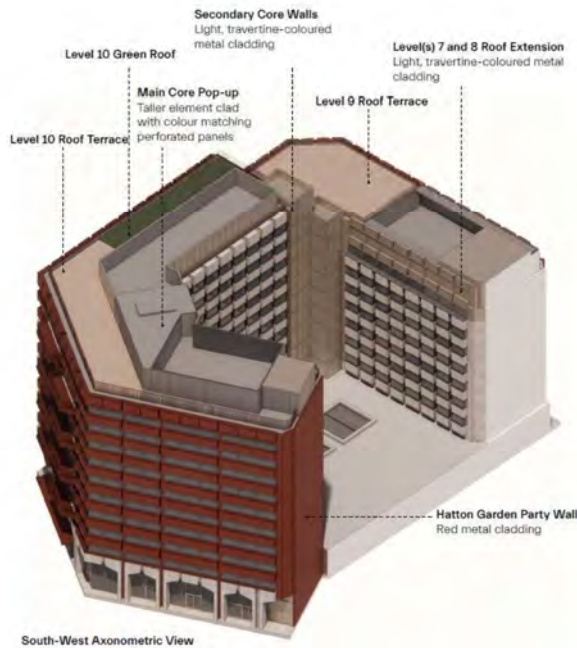
2. THE PROPOSAL

2.1 The key features of the proposed development include:

- Removal of uppermost (8th) storey (plant) on west, Leather Lane, side of building and addition of a new 8th floor of offices to align with the ground to 7th floors below, and a new, recessed 9th floor above.
- Replacement of tenth storey plant on the eastern, Holborn/Hatton Garden side of building and formation of terraces on tenth floor (main building)
- Replacement of granite cladding on main building. Stone and glazing cladding on the East and West Wing, to be replaced with Metal cladding. 2m wide windows separated by columns to be changed to 9m wide window arrays with metal bars. A series of alternating 9m balconies are proposed on the south east, Holborn Circus office entrance elevation.
- Nine storey extension in south west corner of courtyard to provide stairs, lift and services. Provision of mechanical/electrical plant, two skylights and trees/plants within courtyard
- Front 'extension' of undercroft Holborn retail units and office/reception area to align with columns onto Holborn and provision of new accessible shopfronts. Conversion of secondary office entrance at Leather Lane/Holborn corner into café with outdoor seating
- Conversion of rear of shops to form a replacement ground (and lower ground) floor commercial or competitive socialising 'Hub' (Note: The applicant has indicated that it is intended to 're-provide' the competitive socialising space, but that this will depend on leases. If the competitive socialising space is not provided then the space will be a commercial 'Hub')
- Re-modelling and landscaping of paved triangular area at Hatton Garden/Holborn junction with new steps and access ramp, seating and planting for office and public use.
- Provision of 381 cycle spaces and end-of-journey facilities (38 showers and 249 lockers) at lower ground floor level. Provision of 591 sq m of affordable jewellery workspace at lower ground floor level.

Revisions

- 2.2 The fourth item described above (the nine storey extension in the south west corner of the courtyard) was amended soon after the application was submitted. Initially a nine storey stair core was proposed on this internal corner of the building.



- 2.3 Initial application proposal: with new stair core added to corner of internal courtyard
- 2.4 The nine storey stair core on the internal corner of the courtyard was increased in height soon after the application was submitted to include additional lifts/servicing



Amended application proposal: with new stair/lift core added to corner of internal courtyard

3. RELEVANT HISTORY

The site:

- 3.1 2016/5378/P - Alterations to existing basement entrance (serving mixed use development) to form new entrance door with fixed side panel, integral vision panel and door entry system panel; new sign over door, ceiling mounted CCTV camera and new wall mounted lighting – granted 20/10/2016
- 3.2 2016/2365/P - Change of use of the Building Manager's Office from office (Class B1a) to retail (Class A1) and associated works – granted 18/05/2016
- 3.3 2015/6669/P - Omission of swimming pool within the gym approved under planning permission ref: 2014/2782/P dated 20/08/15 (for change of use of part basement to 120 Holborn and 12a Leather Lane from office (class B1) and retail (A1) to leisure centre (D2) and light industrial (B1c) with associated works – granted 01/12/2015
- 3.4 2014/2983/P - Alterations to internal courtyard at first floor level – granted 02/05/2014
- 3.5 2014/2782/P - Change of use of part basement to 120 Holborn and 12a Leather Lane from office (class B1) and retail (A1) to leisure centre (D2) and light industrial (B1c) with associated works (amended description) – granted subject to a legal agreement – granted 25/04/2014 (Note: The existing floor plans confirm that this permission was implemented)

- 3.6 2014/1860/P - Façade and access alterations to Leather Lane/Holborn and Holborn/Hatton Garden ground floor entrances – granted 19/03/2014

4. CONSULTATION

Pre-application consultation

- 4.1 A strategy of engagement with the local community, key stakeholders and representatives in the area for the purpose of receiving feedback on the pre-application proposals was undertaken.
- 4.2 The following events were held during the pre-application process with representatives as follows:
- Early Listening Survey promoted in the local area, gathering information on what local people value about the area surrounding the site, what they would like to see prioritised, and a list of community stakeholders interested in the nearby development. This received 39 respondents.
 - Two door-knocking sessions, taking place in November 2024, delivering flyers containing a link to the Early Listening Survey, covering approx. 200 addresses.
 - Introductory emails sent to four political and seven community stakeholders, introducing the proposals and offering meetings to discuss these.
 - Launching a dedicated consultation website – www.120HolbornConsultation - (Appendix III), providing information on the proposals, digital exhibition boards, and hosting a feedback survey.
 - Members of the project team met with representatives from the Central Alliance and Hatton Garden BIDs to discuss the emerging proposals for the site.
 - Follow up emails sent to political and community stakeholders, notifying them of the launch of the public consultation, and as well as offering meetings with the project team.
 - A flyer sent to c. 1,824 addresses surrounding addresses notifying the local community of the launch of the consultation and providing contact details for enquiries.
 - E-Newsletters sent to a live mailing list and local businesses providing updates at each stage of consultation.
 - A public drop-in over two sessions, presenting the proposals on Exhibition Boards (Appendix VII,) attended by 22 people, including representatives from the Gages Tenants & Residents Association.
 - Five meetings with local political and community stakeholders

LB Camden Design Review Panel (held October 2024):

- 4.3 Camden's Design Review Panel made the following comments at pre-application stage:

'The panel supports the proposal to refurbish and extend the existing building, which creates an opportunity to improve its contribution to the conservation area. The careful consideration taken to retain the vast majority of the existing structure is commended. Additional massing in place of the existing awkward mansard roof works well, alongside the rationalisation of the plant enclosure at the upper roof level.

Reconfiguring the structural bays is particularly beneficial internally, providing enhanced flexibility for furniture layouts, as well as maximising natural light and views.

However, the wider windows currently shown lack definition and emphasise the horizontal proportions of the building. The panel recommends developing the design to reintroduce verticality of the building through articulation and fenestration. The issues associated with retaining the granite cladding are appreciated. The profiled metal cladding panels could be a suitable replacement, but the current form and tone should be reconsidered to create a calmer appearance that is more subservient to the Grade II* listed Waterhouse Square. The improvements to the public realm at the junction with Hatton Garden are positive, but the panel would like to see further enhancements brought round the whole of the building to the Leather Lane junction.

Bringing the building line out to the colonnade at the ground floor works well and will help create a more engaging frontage. The relationship between the public realm and retail uses at the ground floor needs more thought, to create a strong identity and destination that complements the wider area'.

Officer response:

- 4.4 *The Panel's comments on the relationship with Waterhouse Square were noted and addressed in subsequent iterations (and the application proposals) by way of the new additional storey on this side of the building being set-back and the use of red metal cladding which does not detract from the distinctive red brick of the Listed building while it enhances the vibrancy of the building and the streetscene.*

Metal bars are proposed to distinguish the windows and the two columns of balconies on the Holborn Circus elevation would also mitigate against the excessive horizontality of the windows. The new cafe unit at the entrance to Leather Lane would be set back such that external seating will be provided

and this will add to the vitality of the entrance to Leather Lane and the vibrancy of the site as the cornerstone of Leather Lane.

Statutory consultation on the planning application:

- 4.5 Consultation was carried out by the Council after receipt of the planning application by notifying statutory consultees and site and press notices were displayed in line with Camden's Statement of Community Involvement (2024). The following responses were received.

Statutory consultees

Greater London Authority

- 4.6 'I have assessed the details of the application and, given the scale and nature of the proposals, conclude that the proposals would not adversely affect the above Protected Vistas, and therefore the proposals do not give rise to any strategic planning issues. Please note that TfL may send separate comments as part of its statutory consultation response. Therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted further on this application. Your Council may, therefore, proceed to determine the application without further reference to the GLA'

City of London Corporation

- 4.7 London View Management Framework 4A.1, Primrose Hill - The proposal would preserve the view through the use of materials which would match the Portland Stone of St Paul's Cathedral. Where the red cladding of the proposal does appear in the view it is below the threshold plane and as such does not obscure the viewers ability to appreciate the peristyle, drum and dome of the Cathedral.
- 4.8 London View Management Framework 6A.1, Blackheath - The massing would remain below the peristyle of St Paul's Cathedral. The materiality would change from existing, introducing red cladding and landscaping into the view. Further information is required regarding the tone and reflectivity of the cladding to ensure that the viewers ability to appreciate St Pauls Cathedral as a strategical important landmark.
- 4.9 No objection is raised however concern is raised regarding the colour and materiality of the proposed red cladding. It is suggested that a condition is attached to the application to ensure the tone and reflectivity of the cladding is appropriate in local townscape views and the London panoramic views of St Paul's Cathedral.

Officer response:

4.10 *The materials are considered in section 8. Design (below) wherein it is concluded that a condition should be attached to secure details of the appearance of the external materials (including the red cladding) in the interests of preserving the heritage and townscape value of the built environment.*

4.11 If you are minded to approve the application, it is requested that the City of London is consulted on the Constructions Logistics Plan to ensure coordination and mitigation of any cross-boundary impacts.

Officer response:

4.12 *This requirement is noted within section 12 Transport (below).*

4.13 Within the Air Quality Neutral Assessment: Building Emissions - The proposed life-safety generator has been excluded from the assessment. There is no detail within the assessment, or elsewhere in the AQIA if there is an existing or proposed tenant generator which would be required to be included in the assessment. Additionally, confirmation should be sought if there is to be space provision for a tenant generator.

Officer response:

4.14 *The applicant has advised that there is no proposal for a future tenant generator, the only generator that will be on site will be for the Life Safety Requirements.*

4.15 Transport Emissions - It is stated in Section 6.4.2 that 'all general car parking relating to the site will be removed, apart from two disabled parking bays'. This is not consistent with the Design and Access Statement where in Section 13.4 it is stated that 22 parking spaces are to be retained for residential use, with further spaces within the loading bay also to be retained.

Officer response:

4.16 *This information has subsequently been provided to the City of London and no further comments have been received.*

Historic England

Significance of the historic environment

4.17 120 Holborn is a large late-1970s office building designed by Richard Seifert and Partners.

4.18 It is located immediately to the east of the Prudential Assurance Building (Waterhouse Square) - an imposing office complex of 1885-1901, designed in the High Victorian Gothic style by renowned architect Alfred Waterhouse.

Its high degree of architectural and historic interest is reflected in its listing at Grade II*. Externally, it is a building defined by its grand symmetrical frontage and fiery red brick and terracotta, which has a commanding presence along High Holborn. While 120 Holborn is significantly larger, its massing deliberately steps down at its west end to respond to the scale of the listed building.

- 4.19 The development is also located within the Mayor of London's Protected Vista of St Paul's Cathedral (Grade I) from the summit of Primrose Hill (London View Management Framework, View 4A.1). Regarding new development, the supporting Supplementary Planning Guidance (Mayor of London, March 2012) states that 'it is an important characteristic of the view that the viewer's ability to recognise and appreciate the peristyle, drum, dome and western towers of St Paul's Cathedral in the panorama is preserved or enhanced' (Para 132, p62)'.

Proposals and their impact

- 4.20 These proposals seek to retrofit the building to meet sustainability targets, for continued office use. This would include an extension in place of the mansard roof to the lower portion of the building. The plant enclosures would be removed from the taller element, and the building would be reclad in bold red metal panels. Since our pre-application involvement, railings have been added to the taller roof element.
- 4.21 View 05 of the submitted Townscape, Visual and Built Heritage Assessment (Tavernor Consultancy, July 2025) reveals that the proposals would have an overbearing presence along the streetscape due to its increased massing, undermining grand scale of the Prudential Assurance Building. This impact would be exacerbated by the bold red cladding of the proposals, which would compete with the distinctive materiality of the listed building. We therefore consider that some harm, of a low level, would be caused to the Grade II* listed Prudential Assurance Building through this development within its immediate setting.
- 4.22 In the telephoto assessment of LVMF View 4A.1 (View 01T), the proposals (as with the existing building) would appear in front of the drum of the cathedral. However, due to the removal of the plant enclosure, the massing would be slightly reduced. Theoretically, this represents a very modest enhancement, although in reality, it is unlikely that these details would be perceptible to the human eye.

Position

- 4.23 For the reasons set out above, we consider that some harm to the Grade II* listed Prudential Assurance Building would result from these proposals, and as a key building within the Hatton Garden Conservation Area, some harm

would also be caused to that heritage asset. We consider the harm in both cases to be low.

- 4.24 This harm could be mitigated through more muted tones for the metal cladding which would reduce the visual competition with the highly significant brick and terracotta materiality of the listed building. We suggest that relevant conditions are imposed regarding these materials should your Council be minded to approve the scheme.

Recommendation

- 4.25 Historic England wishes to raise no objection to the application on heritage grounds. However, the harm we have identified should be taken into account in determining the application in line with the heritage policies of the NPPF (December 2024), particularly Paragraphs 208, 213 and.

Officer response:

- 4.26 *As noted in 'Design: Heritage' in the Assessment section of this report, the Council does not consider that the bulk/siting of the proposals would harm the prominence, appearance or setting of the Grade II* Listed Waterhouse Square within any views from adjacent streets. However, the Council shares Historic England's views that the proposed red cladding would potentially detract from the significance of the red brick of Waterhouse Square and a condition is therefore required to secure the submission, approval and implementation of an appropriate shade of cladding.*

Adjoining occupiers

- 4.27 Site notices were displayed on each of Holborn, Hatton Garden and Leather Lane and also at the Gamages Estate. The notices were displayed on 27/08/2025 until 20/09/2025 and the application was advertised in the local paper on 28/08/2025 (expiring 21/09/2025).
- 4.28 Objections were received from 3 neighbouring occupiers/owners (including 2 from Vesage Court and 1 from Jeygrove Court). The objections received by the Council are on the Council's website. The key issues raised are:

Planning obligations for Gamages Estate:

- 4.29 The application should include planning obligations (incl. landscaping/courtyard improvements) within Gamages Estate to mitigate against adverse effects on noise and light at Gamages Estate properties.

Officer response:

- 4.30 *Consideration of the effects on the amenity and living conditions of neighbouring occupiers is undertaken in 'Neighbouring occupiers amenity' in the Assessment section below. The proposed development is assessed not*

to result in any significant harm to the amenity or living conditions of any Gamages Estate occupiers and the suggested planning obligations could not be justified, they would not be reasonably related to the proposed development.

Unacceptable effects on light to neighbouring properties on the Gamages Estate:

- 4.31 Information is provided on the configuration of the flats in Vesage Court. The flats do not comprise dual aspect flats. 70 of the 120 flats look on to the inner courtyard, 60 only have 2 windows (1 of which already loses light because of the overhang of their balconies). The bedroom window is the only window getting unobstructed light. The lower floor flats towards the southern end are already very dark inside and with the proposed extensions they will be even darker.
- 4.32 A resident within Jeygrove Court questions the validity of the assessment that because the flats are already overshadowed by overhanging balconies that the proposal would have insignificant incremental effects on the light received within habitable rooms.

Officer response:

- 4.33 *See 'Daylight & Sunlight' in 'Neighbouring Occupiers Amenity below'. Sunlight and daylight levels at Vesage Court would remain within BRE guidelines when measured in terms of the Vertical Sky Component (daylight), No Sky Line (daylight) and Annual Probable Sunlight Hours (sunlight). At Jeygrove Court, where daylight levels are below recommended BRE guidelines it is principally due to the presence of overhanging balconies. As such, the proposed development would not impair the daylight or sunlight conditions in itself at any Jeygrove Court properties. Where sunlight/daylight levels are below recommended BRE guidelines it is because of the existing overhanging balconies and any deterioration in the light conditions as a result of the proposals is not substantial.*

Noise and disturbance to neighbouring occupiers during construction and during operation

Officer response:

- 4.34 *Noise and disturbance during demolition/construction works are controlled by way of Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents. These will therefore be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.*

- 4.35 *The proposed configuration, layout and uses of the building would not result in significantly increased noise or disturbance for any neighbouring occupiers when in operation.*

Excessive traffic, noise, dust and disturbance to neighbouring occupiers

Officer response:

- 4.36 *Traffic, noise, dust and disturbance during demolition/construction works are controlled by way of Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents. These will therefore be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.*

Air quality impacts: dust and disturbance to neighbouring occupiers during construction

Officer response:

- 4.37 *See 'Air Quality' in the Assessment below. An Air Quality Assessment has been submitted and this recommends that mitigation should be included in a Construction Management Plan. This will be secured under a S106 agreement. With the mitigation in place, construction dust effects are not expected to result in significant effects on local receptors.*

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
GG5 Growing a good economy
GG6 Increasing efficiency and resilience
SD4 The Central Activities Zone (CAZ)
SD5 Offices, other strategic functions and residential development in the CAZ
D1 London's form, character and capacity for growth
D4 Delivering good design
D8 Public realm
D9 Tall buildings
D14 Noise
E1 Offices
E2 Providing suitable business space
E3 Affordable workspace
HC1 Heritage conservation and growth
HC4 London View Management Framework

G5 Urban greening
G6 Biodiversity and access to nature
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 4 Managing heat risk
SI 7 Reducing waste and supporting the circular economy
SI 8 Waste capacity and net waste self-sufficiency
SI 12 Flood risk management
SI 13 Sustainable drainage
T1 Strategic approach to transport
T2 Healthy Streets
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.2 Office Parking
T7 Deliveries, servicing and construction
T9 Funding transport infrastructure through planning
DF1 Delivery of the Plan and Planning Obligations

London Plan Guidance (LPG)

Accessible London SPG
Characterisation and Growth Strategy LPG
London View Management Framework SPG
Urban greening factor LPG (February 2023)
Air quality positive LPG
Air quality neutral LPG
Be Seen energy monitoring LPG
Circular economy statements LPG
Energy Planning Guidance
The control of dust and emissions in construction SPG
Whole life carbon LPG
Sustainable Transport, Walking and Cycling

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy G1 Delivery and location of growth
Policy C5 Safety and security
Policy C6 Access for all
Policy E1 Economic development
Policy E2 Employment premises and sites
Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy A4 Noise and vibration
Policy D1 Design
Policy D2 Heritage
Policy CC1 Climate change mitigation
Policy CC2 Adapting to climate change
Policy CC3 Water and flooding

Policy CC4 Air quality
Policy CC5 Waste
Policy T1 Prioritising walking, cycling and public transport
Policy T2 Parking and car-free development
Policy T3 Transport infrastructure
Policy T4 Sustainable movement of goods and materials
Policy DM1 Delivery and monitoring

Supplementary Planning Documents and Guidance

Access for All CPG - March 2019
Air Quality - January 2021
Amenity - January 2021
Biodiversity CPG - March 2018
Community uses, leisure and pubs - January 2021
Design - January 2021
Developer Contribution CPG - March 2019
Employment sites and business premises - January 2021
Energy efficiency and adaptation - January 2021
Planning for health and wellbeing - January 2021
Public open space - January 2021
Town centres and retail - January 2021
Transport - January 2021
Trees CPG - March 2019
Water and flooding CPG - March 2019

Other guidance:

Hatton Garden Conservation Area appraisal and management strategy
2017

Draft Camden Local Plan

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

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

The Proposed [Submission Draft Camden 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.

Holborn Vision Supplementary Planning Document (SPD) on 29 January 2025

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: LVMF Views, Tall Building Assessment, Urban Design, Heritage
9	Neighbouring occupiers amenity
10	Sustainability & Energy
11	Air Quality
12	Transport
13	Landscaping & Biodiversity
14	Employment, training & opportunities
15	Waste storage and collection
16	Fire Statement
17	Crime Impact Assessment
18	Flooding & Drainage
19	Community Infrastructure Levy

7. LAND USE

- 7.1 The site is in the Central London Area, but it is not within any Site Allocations in the Council's adopted Site Allocations Plan, or on the Site Allocations Plan associated with the new Draft Local Plan.

Existing Uses

- 7.2 The site is wholly commercial and the existing commercial uses are long standing. The most relevant planning history, in terms of use, is planning permission 2014/2782/P, granted subject to a S106 legal agreement on 20/08/2015, for 'Change of use of part basement to 120 Holborn and 12a Leather Lane from office (class B1) and retail (A1) to leisure centre (D2) and light industrial (B1c) with associated works'. This permission was subject to a condition (condition 5) which stated: 'Notwithstanding the provisions of Class D2 of the Schedule of the Town and Country Planning (Use Classes)

Order 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the premises shall only be used as an indoor fitness/sports centre and for no other purpose within that Class’.

- 7.3 The existing uses, which include the ground floor public house, retail and food/drink uses, lower ground floor ‘competitive’ socialising space (the Bounce Club), restaurant, ancillary commercial space and upper floor offices are all lawful and all proposed to be retained/re-provided. Further consideration of the uses to be retained/re-provided and the new uses to be created is undertaken in ‘Proposed Uses’ below.

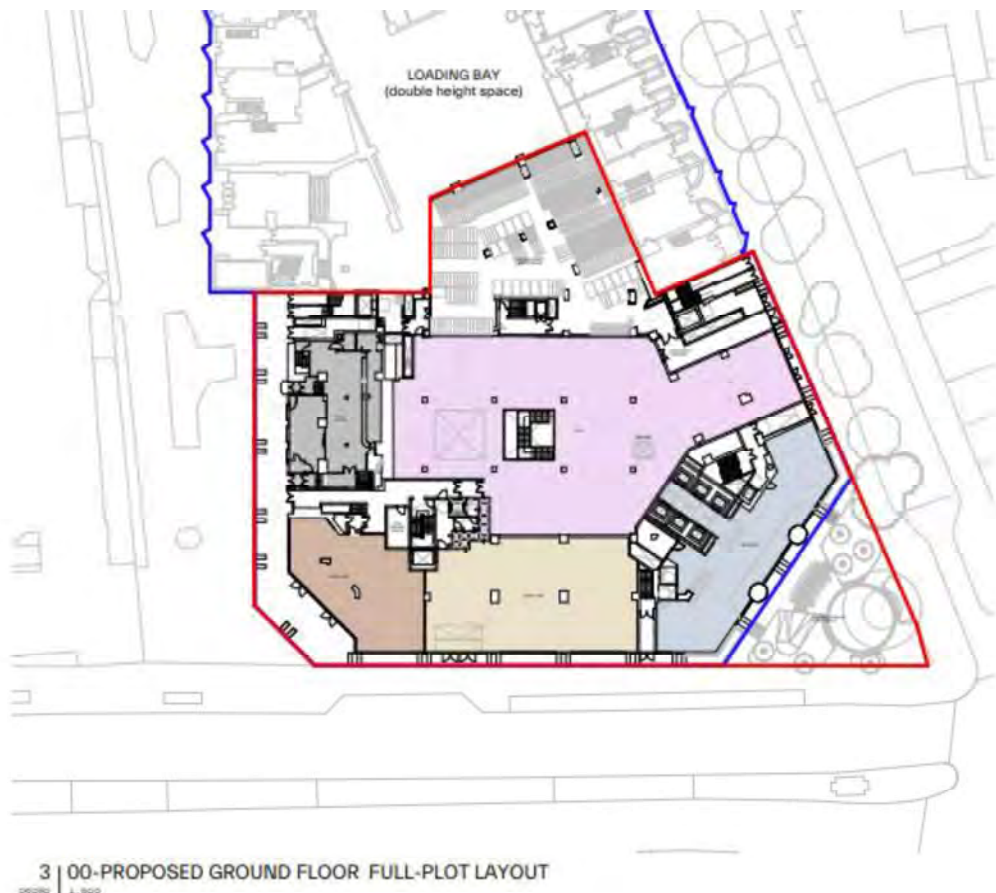
Proposed Uses

- 7.4 The development would provide a range of retained/re-provided Class E floorspace and new Class E floorspace of different types. On the lower ground floor there would be new affordable jewellery workspace, commercial ‘Hub’ space and ancillary retail space for the (reconfigured) ground floor shops. The public house space on the lower ground floor would be retained.



Proposed Lower Ground Floor Plan

- 7.5 On the ground floor the existing main entrance/reception would be remodelled with more circulation space provided. A central commercial 'Hub' would be formed (linking to the lower ground floor 'Hub' and the existing ground floor retail units would be extended forwards to the building line along Holborn. (Note: The applicant has indicated that it is intended to 'reprovide' the competitive socialising space, but that this will depend on leases. If this 'sui-generis' is not provided then the space will be a commercial 'Hub')



- 7.6 The existing secondary office reception in the Holborn / Leather Lane corner of the building will become a new retail unit and the ground floor public house would be retained. The mezzanine and first to ninth floors would all be retained/provided for offices.
- 7.7 The re-provision of existing commercial uses and the provision of new commercial floorspace are acceptable in land use terms under the Development Plan.
- 7.8 The site is located within the Central London Area's Central Activities Zone, which the London Plan identifies as a nationally important strategic office location.

- 7.9 Policy E1 of the Local Plan supports the provision of a range of business and employment floorspace including the intensification of existing employment sites and seeks to direct new economic development to the growth areas, including Central London.
- 7.10 It should be noted that the existing lower ground floor Bounce Club is not shown on the proposed lower ground floor plan. It appears to be replaced by a 'Hub' shaded in purple on the proposed lower ground floor plan.
- 7.11 The applicant has confirmed that it is currently the intention that the Bounce (competitive socialising) Club use is retained, however this would be flexible space which could alternatively provide Class E floorspace, and it will depend on leases etc. once the building is delivered
- 7.12 The provision of the flexible use of Sui Generis/Class E commercial space here is supported allowing for a wider range of tenants which could include an existing occupier being reaccommodated. Flexible options for uses can be important in delivering viable and sustainable uses within developments, allowing a period of flexibility. Permission for a flexible use allows a landowner to implement a range of options for the first use, improving chances of finding tenants and minimising the chances of vacancy. Flexibility is provided by the Town and Country Planning (General Permitted Development) Order 2015. Class V of Part 3 of the Order allows changes between the permitted uses (in this case commercial and education) for a period of ten years after the grant of planning permission, subject to any relevant conditions on the permission.
- 7.13 Given the site's location within the Central Activities Zone, the uplift in office floorspace and reconfigured retail space is considered appropriate development in this location which would contribute towards a successful and inclusive economy, in accordance with both local and regional policies, including policies G1, E1, E2 and TC1 of the Camden Local Plan, and London Plan policies GG1, GG2, E1, and SD4.
- 7.14 Policy E1 of the Local Plan notes that *'Hatton Garden has been an established centre for the jewellery industry since the 19th Century and today the area is home to nearly 500 businesses and over 50 shops related to the industry. In order to promote Hatton Garden as a location for jewellery related uses, the Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses through planning obligations.'*
- 7.15 Policy E2 of the Local Plan requires 50% of new employment floorspace (above 200 sqm) in Hatton Garden to be affordable jewellery workspace. 591 sqm of affordable jewellery workspace will be provided within a single space, which can be sub-divided on the lower ground floor. 591 sqm of the net additional floorspace (1,181 sq m) represents 50% of the uplift, in accordance with the policy requirement under E2. The affordable jewellery

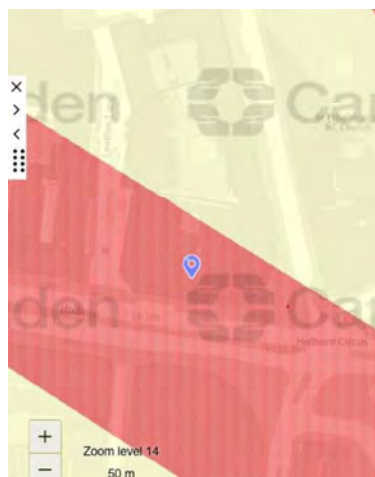
workspace will be secured at 50% of market rents in perpetuity under a S106 agreement.

- 7.16 The Council will require the proposed jewellery workshop space to consist of cellular spaces of a range of sizes. Small premises are necessary to ensure spaces are affordable to jewellery businesses.
- 7.17 The affordable jewellery workspace will therefore be included within a commercial space plan and subject to a delivery plan, including fitting out, all to be included in the S106 legal agreement. A marketing plan should be included in the S106 legal agreement, setting out how the space will be marketed to jewellery sector businesses. The marketing plan should also set out measures to ensure that service charges and other associated fees are affordable.

8. DESIGN

LVMF VIEWS

- 8.1 The site lies within the viewing corridors of three London View Management Framework (LVMF) views: namely 4A.1 (Primrose Hill to St Paul's Cathedral), 5A.2 (Greenwich Park to St Paul's Cathedral) and 6A.1 (Blackheath Point to St Paul's Cathedral). These views were designated in order to protect and manage key views of London's city skyline, including an appreciation of Strategically Important Landmarks comprising highly graded heritage assets such as the Grade I listed St Paul's Cathedral and the Grade II* listed Old Bailey.
- 8.2 The LVMF views from Primrose Hill is shown on the LB Camden Local Plan policies map. The red shaded area indicates the area within which St Paul's Cathedral is viewed from Primrose Hill and the yellow shaded area denotes the protected view in its entirety:



Extract from Local Plan policies map showing extent of site within protected view of St Paul's Cathedral from Primrose Hill

- 8.3 The Townscape, Visual and Built Heritage Assessment includes long range and telephoto range views (existing and proposed) of St. Paul's Cathedral from Primrose Hill. The existing and proposed telephone lens views are copied below:

Existing view from Primrose Hill (telephoto lens):



- 8.4 Part of the proposed development would be visible in the same part of the view as the existing building, in front of the lower drum of St Paul's Cathedral, at a distance of approximately 4.3km from the viewer. Like the existing building on Site, a small part of the roof level of the proposed development would be visible in the view and it would be situated within the Viewing Corridor, partly rising above the threshold plane. The zoomed view shows that the visible portion of the proposed development would be slightly less than that of the existing building, thereby very slightly reducing the degree of building mass which appears in front of St Paul's.
- 8.5 Additionally, the materials and tone of the part of the proposed development which is seen within the viewing corridor and in front of St Paul's have been carefully considered to reduce its visibility further. Most of the visible part of the proposed development is plant screen and roof level balustrades; these elements have been designed and coloured so as to blend with the light tone of the Portland stone of St Paul's Cathedral so that, when viewed with both the naked eye and through a zoomed lens, it would not be immediately apparent. A short slither of the red-coloured main body of the proposed building (the return (west) elevation of the taller volume) would also be visible; it would be set below the threshold plane, below the Cathedral's lower

drum. It would appear alongside neighbouring rooftops which together would have a darker appearance than the cathedral, helping to distinguish the base of the drum of St Paul's in the view through visual contrast.

- 8.6 The balustrades which would be visible in the zoomed version of this view enclose areas of the rooftop which would be accessible for maintenance purposes only. The terraces which would be landscaped for the use of the building's tenants would not be visible. The planting on the uppermost tenants' terrace will include climbing plants and shrubs but no trees, so as to avoid any visual protrusion rising beyond the plant screen in this view.
- 8.7 Overall, it is unlikely that the proposed development would be noticed in the view. It would be visible with a zoom lens but has been carefully designed so as to be as recessive as possible and to not affect the ability to recognise or appreciate St Paul's Cathedral from this viewpoint. The magnitude of impact will be very low and the effect will be negligible.

Proposed view from Primrose Hill (telephoto lens):



- 8.8 The protected views from Greenwich Park and Blackheath Point have been reviewed by the Greater London Authority (who have been consulted as the development proposals are within the GLA London View Management Framework). The GLA has advised '*the proposals would not adversely affect the above Protected Vistas, and therefore the proposals do not give rise to any strategic planning issues*'.

URBAN DESIGN

TALL BUILDING ASSESSMENT

- 8.9 There is no specific definition of a tall building in the adopted Local Plan, but the development does meet the definition of a tall building in the Draft Local Plan (2025).
- 8.10 In terms of the adopted Local Plan, in addition to the design criteria which apply to all forms of development, tall buildings in the Borough will be considered in relation to the following specific tall buildings criteria:
- how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
 - the historic context of the building's surroundings;
 - the relationship between the building and hills and views;
 - the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
 - the contribution a building makes to pedestrian permeability and improved public accessibility.
- 8.11 Furthermore, policy D1 states that tall buildings will be assessed against other relevant planning issues – i.e. amenity, mixed use and sustainability. These issues are addressed in other sections of this report.
- 8.12 With respect to the policy (D2) for Tall Buildings in the Draft Local Plan (2025) this does not 'rule out' a new tall building at the site. It is acknowledged that the policy includes a list of areas where new tall buildings may be appropriate (i.e. Table 12, illustrated by way of Figure 22). However, the policy essentially advises that applications for tall buildings should be considered in relation to the London Plan tall buildings policy and the design criteria in Local Plan policy D1. Like in the adopted Local Plan, the policy lists specific criteria against which an application for a tall building should be considered, vis:-

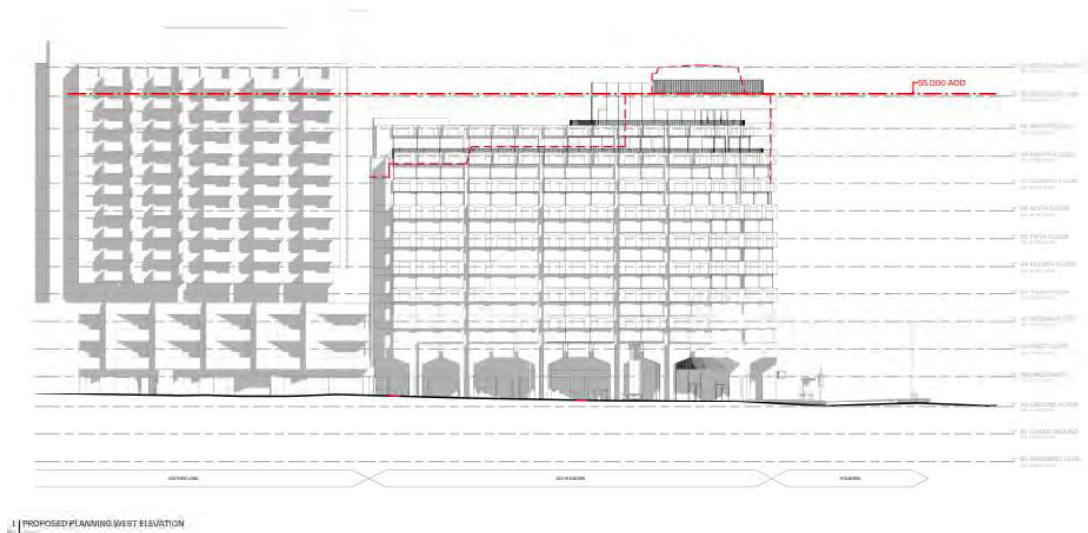
1. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline, having regard to both the existing and the emerging context;
2. the relationship between the building and neighbouring boroughs, where tall buildings are proposed close to the borough boundary;
3. whether the proposal maximises energy efficiency and resource efficiency in accordance with Climate Change Policies CC3, CC4 and CC6;
4. whether the development delivers the highest standards of sustainable design and construction in line with Policy D1 (Achieving Design Excellence);
5. whether the proposal maximises the supply of affordable housing in accordance with Policy H4 (Affordable Housing);
6. whether the proposal creates a safe and secure environment in accordance with Policy A2 (Safety and Security);
7. whether the site is of a sufficient size to accommodate a tall building, without having a detrimental impact on existing buildings, public spaces and amenity;
8. the historic context of the building's surroundings and whether the proposal preserves or enhances the historic environment and heritage assets in accordance with Policy D5 (Historic Environment);
9. the relationship between the building and hills and views, ensuring that any proposal considers local views and preserves protected strategic views;
10. the contribution a building makes to pedestrian movement and experience, connectivity and improved public accessibility;
11. the degree to which the building overshadows neighbouring buildings and spaces, especially public spaces, open spaces, watercourses and renewable energy infrastructure;
12. the relationship between the building and other neighbouring tall buildings;
13. the contribution the development makes to wider place making objectives and infrastructure delivery in line with Policies DS1 (Healthy and Sustainable Development), D1 (Achieving Design Excellence) and DM1 (Delivery and Monitoring);
14. the quality of homes and amenities provided;
15. the proposed internal and external illumination of the building. All tall building proposals will require a Lighting Strategy; and
16. the impact on biodiversity, for example migratory routes and bird collisions, in accordance with Policy NE2 (Biodiversity).

- 8.13 It has been demonstrated (in 'LVMF views' above) and the GLA concur that the height and size of the development would not harm the protected 'long range' views from Primrose Hill, Greenwich Park and Blackheath Point.
- 8.14 Furthermore, the increased height would not harm the character or appearance of the adjacent streetscenes or roofscapes.
- 8.15 As can be seen from the Proposed East Elevation below (which has the top of the existing building shown by the dashed red line) the top floor of the new building would be 1m higher than the existing roof-top plant when viewed from the east. (It should also be noted that the level of the plant on the centre of the roof would actually be reduced by 2m in height). The proposed 1m increase in height to plant along the Hatton Garden elevation would not result in any harm to the character or appearance of the Conservation Area.



Proposed east (Hatton Garden) elevation with 1m increase in height of top floor shown

- 8.16 As can be seen from the Proposed West Elevation below (which has the top of the existing building shown by the dashed red line) the top floor of the new building would be 1m higher than the existing roof-top plant when viewed from the west. (It should also be noted that the level of the plant on the centre of the roof would actually be reduced by 2m in height). The proposed 1m increase in height to plant, when viewed from the west, would not result in any harm to the character or appearance of the Conservation Area



Proposed west (Leather Lane) elevation with 1m increase in height (and central 2m reduction in height) shown

- 8.17 The minimal increase in height would not impact unduly upon the ‘other’ criteria referenced in the tall buildings policies, e.g. amenity, energy, sustainability, biodiversity etc). As such, the proposals would accord with the tall buildings policies in the adopted Local Plan (D1) and draft Camden Local Plan (D2).

FURTHER URBAN DESIGN COMMENTS

Existing building:

- 8.18 The existing building sits on a prominent corner of Hatton Garden and Holborn (A40), making it highly visible both within the Hatton Garden/Holborn junction where it sits and in long views. It is a robust building, with a massing that sits comfortably in its context, but stepping down abruptly from ten storeys facing the Hatton Garden corner to eight storeys in direct response to the Waterhouse Square building directly to the west across Leather Lane.
- 8.19 The building follows similar design principles to other office blocks built by Seifert and other architectural practices around that time: a structural plinth lifting the building above street level creating a deep, sculptural colonnade housing retail units behind; a body with a structure which separates the walls from the structure itself, allowing for generous openings and a flexible open plan internally with deep floorplates; and a weak building crown dominated by roof plant which impacts the St Paul’s Cathedral LVMF viewing corridor.
- 8.20 While the materials used to clad the building are high quality and robust (pink granite and travertine), the monotonous, repetitive 3m grid across an extensive facade, exacerbated by the lack of depth and horizontal banding in otherwise generous window openings, makes the building look flat, uninviting and austere with an underwhelming and confusing entrance. The building facade is also performing poorly thermally, the large south facing openings leading to overheating.
- 8.21 The building’s location near the Leather Lane Market, a popular lunchtime destination, the arrival of the Elizabeth Line and other cultural institutions nearby, together with the Holborn Vision aim to improve Hatton Garden in general, provides a great opportunity to transform 120 Holborn into a high quality sustainable scheme. Changes such as enhancing the flat and monotonous facade, the improvement of the arrival experience and relationship with both the street and surrounding buildings, its energy performance, as well as reinforcing the building’s position in a well-used, walkable and attractive neighbourhood through the landscape design, will reposition 120 Holborn as an active, welcoming building contributing to its context.

Design response

- 8.22 The proposal refurbishes the existing building through the retention of the existing structure including the sculptural travertine plinth, targeting several sustainability credentials including BREEAM Outstanding, to bring the building to contemporary energy standards and improve its poorly performing envelope. The scheme enhances the existing facade through careful detailing rooted in the history of Hatton Garden as London's jewellery quarter. The reintegration of the building into its context by improving its relationship with the existing buildings and streetscape will provide a more inviting arrival experience to the building and Camden, transforming it into a natural gateway to Hatton Garden.

Ground Floor

- 8.23 The proposal seeks to activate the ground floor by pushing the colonnade out to meet the street level and extending the currently dark and deep retail units by three metres along Holborn, increasing their visibility and engagement with the street. The move also enables the level change currently present in the public realm to be negotiated internally, which is welcome.
- 8.24 The retention of the sculptural travertine plinth enables the celebration of the activated street frontage while retaining the character of the existing building and its greatest feature; retaining the open colonnade on the corner with Leather Lane as a result of feedback received in the pre-application process means the generosity of the public realm is kept and a permeable thoroughfare, which can support sheltered spill out activity, is created connecting the historic Leather Lane to Holborn. The consolidation of the building entrance on the corner of Holborn and Hatton Garden increases accessibility and clarity of movement, which together with the public realm improvements, improves the sense of arrival and the Hatton Garden gateway.

Massing

- 8.25 The scheme retains the general height of the main wing with minor adjustments to refine the building's crown in local and wider views but replaces the existing two mansard floors on the western Leather Lane wing with a sensitive extension that has an articulated mass, successfully addressing the abrupt height difference between the main and west wings. The additional massing is sensitively set back to respond and maintain visibility to the Waterhouse Square building in key views, minimising impact to context. Historic England raised concerns in relation to the effect of the additional bulk on the setting and appearance of the Grade II* Listed Waterhouse Square. However, as shown in the 'Heritage' section, the proposed extensions are not considered to detract from the prominence,

appearance or setting of Waterhouse Square from the streetscenes along Holborn (east and west) or along (down) Leather Lane.

- 8.26 The constraints of the LVMF views have clearly informed the massing changes; compared to the existing building whose plant equipment breaches the LVMF corridor, the proposal consolidates the crown on the main body concealing the rooftop plant and thus reducing the height on the Holborn Circus corner. These clever design moves not only reduce impact in LVMF views but enable the scheme to introduce roof terraces and external amenity space which lack in the existing building.

Appearance, detailing and materials

- 8.27 The proposal takes different approaches to the south and street facing, and courtyard facades.
- 8.28 The new architectural language of the highly visible street facing facade is simple but highly effective, driven by a clear ambition to improve the quality of the internal spaces and functionality. The rhythm of the facade is changed from a relentless 3 metre to a 6 and 9 metre bay, combining the bays internally to improve layout and usability. In contrast, and to avoid unnecessary construction and minimise the need for additional structural reinforcement, the north-facing courtyard facade is maintained as a 3 metre grid, which enables the retention of the travertine panels. This is a welcome decision which means a higher retention of the existing building.
- 8.29 The south facing facade changes increase the amount of daylight entering the internal spaces while minimising overheating and improving the thermal performance of the facade. Externally, this move re-aligns the elevation rhythm to that of the structural colonnade below, activating the facade and introducing much needed depth and shadow to a previously flat and monotonous facade. The introduction of balconies to the Holborn Circus facade breaks up the rhythm, animates the elevation and signals the consolidated entrance, whilst providing amenity space for the building's users.
- 8.30 The material changes on the south facing facade as a result of extensive investigations into the potential reuse of the pink granite panels which revealed safety concerns and risks, is well understood. The intent to use the external pink granite internally in floor surfaces is welcome and should be conditioned to ensure the sustainability ambitions of the project are met.
- 8.31 The proposed metal panels, whose profile is inspired by the geometry of the travertine plinth, form part of the window cills and sit proud of the glazing line to provide solar shading. The verticality of the new 9m rhythm is reinforced by incorporating the metal within the grooves, which elegantly continues from

the body into the travertine plinth at street level, introducing colour, interest and a sense of cohesion previously lacking in the existing facade.

- 8.32 The choice of metal for the south-facing facade enables the building's character to remain truthful to the original architectural intention, introducing a fresh expression and distinct presence that is sensitive of the heritage context without being pastiche. Historic England, in their application consultation response, raise concern with the tone of the proposed red cladding in relation to the red brick of the Grade II* Listed Waterhouse Square. The cladding appears to be bold and potentially overwhelming in relation to the historic brickwork. Historic England recommended that the colour of the cladding should be controlled by a condition to safeguard the appearance of the Listed building. An appropriate condition is duly attached.
- 8.33 At ground level the glazing line, pushed out to meet the travertine line, is enhanced by the introduction of new lightweight metalwork and elegant louvre motifs above the shop front windows matching the colour of the travertine, directly inspired by the rich jewellery history of the building's context, contributing to a richness of detail.
- 8.34 The new facade relies on the quality and simplicity of the materials, the careful and elegant detailing speaking to the jewellery history of the context, layered on a robust existing structure with a sculptural, strong plinth. Together, these design principles create a refreshed building that is contextual, contributing to the character of the area in a way the existing building does not. The materials are to be conditioned to ensure a building of the highest quality with a durable finish that weathers gracefully and stands the test of time.

Open space and landscaping

- 8.35 The Hatton Garden gateway is further enhanced and celebrated by the transformation of the paved area at Holborn Circus/Hatton Garden, which is currently uninviting, underutilised and largely dominated by hard materials, into a welcoming and calming arrival square, acting as a threshold between the busy junction and the building itself. This is achieved through the introduction of a softer material palette complemented by a lush and mixed planting palette that provides visual interest, introduces shading to reduce heat gain through additional trees, and supports biodiversity. Opportunities to dwell are increased by the addition of timber benches arranged in a circle, visible through the in-ground brass inlay that references the jewellery quarter. The pre-application process ensured that this space remains a genuinely public space, rather than a space exclusively used by the building's users, through positive changes in the layout and design.
- 8.36 The roof terraces provide much needed amenity space for the building's users. The high-quality materials, planting palette and flexibility of the spaces

will contribute to an external space that is usable and well used. The central courtyard will be transformed from a hardscaped, uninviting area into a biodiverse garden with a shade-tolerant planting palette. The addition of various planted areas throughout the scheme is welcome in creating biodiverse green spaces that can support the creation of habitats.

- 8.37 The success of the scheme therefore relies not only on the architectural language, but also on the quality of the landscape materials, richness of the planting palette across the different landscaped elements and thoughtful design of the arrival space and creation of a new public realm at Holborn Circus. These should therefore be conditioned along with a maintenance plan, secured by way of a S106 agreement, to ensure a holistic scheme that delivers for all users of the public realm.
- 8.38 The retention of the architect (Morris & Co) involved with the pre-application and the preparation and submission of the application is to be secured within the S106 agreement. This is in the interests of implementing the planning permission expediently in accordance with the approved conditions and S106 obligations, in the proper interests of planning.

HERITAGE:

The Planning (Listed Building and Conservation Area) Act 1990

- 8.39 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) 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.
- 8.40 Section 72 of the Act contains similar requirements with respect to buildings or land in a conservation area. In this context, “preserving”, means causing no harm.
- 8.41 The effect of these sections of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of Listed Buildings, Conservation Areas and their settings. Considerable importance and weight must 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. In concluding on the balance, considerable importance and weight should be attached to the harm.

The National Planning Policy Framework 2024 (NPPF)

- 8.42 The NPPF requires its own exercise to be undertaken as set out in chapter 16 (Conserving and enhancing the historic environment).
- 8.43 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. 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 (paragraphs 212 to 215).
- 8.44 London Plan policy D4, policy D1 of the Local Plan and CPG (Design) seek to secure high quality design. Policy D1 seeks high quality design in all development by requiring development to respond to local character and context, be highly sustainable in design and construction, integrate well with the surrounding streets and townscape, comprise high quality architecture, and be accessible for all. Policy D2 is also relevant given the site's location in the Hatton Garden Conservation Area and near to listed buildings. It requires development to preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- 8.45 The principal conservation issues are as follows:
- Character and appearance of Hatton Garden Conservation Area
 - Setting of listed buildings

Character and appearance of Hatton Garden Conservation Area

- 8.46 The building is located in sub area 4 of the conservation area and is not noted in the 2017 conservation area appraisal as making a positive contribution in the Conservation Area.. On page 40 of this document is notes that:
- "The large 1980s office building to the east lacks interest and is at odds with the character of the Area."*
- 8.47 Therefore, there is an opportunity to provide a more interesting building on the site which responds better to the conservation area.
- 8.48 As it predominantly faces onto Holborn, it's design and scale reference this street, rather than the finer grain of the conservation area. By retaining the building, the applicant is constrained with how the building can be altered to respond to the smaller scale and finer grain of development found through the rest of the conservation area.
- 8.49 Additional bulk is provided on the western shoulder of the existing building, with the provision of two extra storeys, however this will not make the building

taller overall. The massing has been arranged with a slight staggered set back, which reduces the impact in views along Holborn and Leather Lane. This bulk is viewed in conjunction with the taller and more modern building on Leather Lane at Vesage Court.

- 8.50 The use of two tones for the cladding would visually break up the perceived bulk of the building, in a similar way to the existing. . A red metal cladding is proposed, which in the context of the neighbouring would potentially be too dominant, but this may just be how it appears on the visuals submitted. By conditioning details of the materials, a suitable tone and finish for the Conservation Area could be secured.

Setting of neighbouring Listed buildings

Waterhouse Square Building

- 8.51 The proposed development would be visible alongside the Grade II* Listed building in views along Holborn from the east and the west, and southerly views along Leather Lane.
- 8.52 The main body of Waterhouse Square is of a similar height to the surrounding townscape. However it is the taller element of the central tower which gives it its landmark qualities.
- 8.53 Historic England (HE), in their consultation response, note that *‘the proposals would have an overbearing presence along the streetscape due to its increased massing, undermining the grand scale of the Prudential Assurance Building (Waterhouse Square). This impact would be exacerbated by the bold red cladding of the proposals, which would compete with the distinctive materiality of the listed building. We therefore consider that some harm, of a low level, would be caused to the Grade II* listed Prudential Assurance Building through this development within its immediate setting’*.
- 8.54 However, HE note that this harm could be mitigated through more muted tones for the metal cladding which would reduce the visual competition with the highly significant brick and terracotta materiality of the listed building. HE suggest that relevant conditions are imposed regarding the materials in the event that the scheme is recommended for approval.
- 8.55 The Council note that the proposed development is no taller than the Waterhouse Square building, although bulk is added to its western shoulder facing onto Leather Lane. However, this does not alter the distinctive views of Waterhouse Square in views from the west (along Holborn).



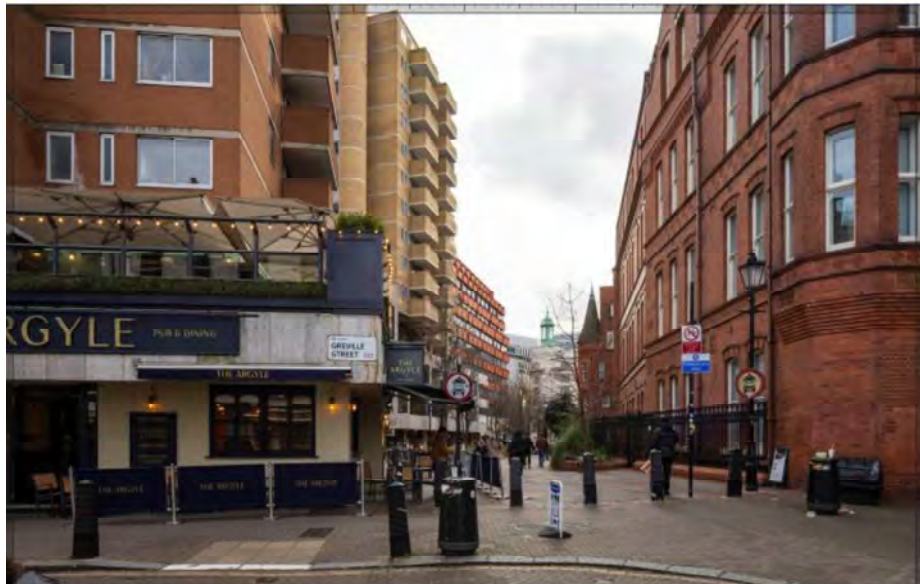
Existing and proposed views along Holborn from the west

- 8.56 As the additional bulk is slightly set back, the tower is still clearly visible and silhouetted against the sky in views from the east, in particular from Holborn Viaduct.



Existing and proposed views from Holborn Viaduct (east)

- 8.57 In southerly views along Leather Lane, the additional bulk is somewhat screened by the taller building at Vesage Court, meaning that the proposed development does not have an overbearing impact on the Waterhouse Square building.



Existing and proposed views down Leather Lane

- 8.58 The Council concludes that the proposals would not harm the appearance or setting of the Grade II* Listed Waterhouse Square from any public vantage points, subject to the imposition of a condition to control the appearance of the external materials (duly attached).

5 Hatton Garden

- 8.59 The proposed development will be viewed in conjunction with the front elevation of Grade II listed 5 Hatton Garden, on opposite sides of the street, in an area of varied scale and architectural styles. The size of the proposed development will remain largely the same as the existing, so it will not

appreciably alter the relationship with this listed building, therefore preserving its setting.

Conclusion on effects on character and appearance of Hatton Garden Conservation Area and setting of neighbouring Listed buildings

- 8.60 The form, siting, design and treatment of the scheme has been undertaken to address the relevant heritage assets. No harm would be caused to the significance of the Hatton Garden Conservation Area and the appearance and setting of the adjoining Grade II* Listed Waterhouse Square within the streetscenes would not be compromised (subject to a condition relating to the approval of materials).
- 8.61 It should also be noted that the proposals would encompass several public benefits, such as new and improved employment floorspace meeting current standards, improved retail/restaurant facilities, affordable jewellery workspace, enhanced landscaping and public realm improvements. Given the nature of the proposals and level of public benefits, on balance, there would be no 'over-riding' harm to any heritage assets and the proposals would comply with the policy for conserving the historic environment in the NPPF and the London Plan and LB Camden policies for heritage. Considerable importance and weight have been attached to the harm caused to the setting of the listed building in reaching this conclusion.

9. NEIGHBOURING OCCUPIERS AMENITY

- 9.1 Local Plan policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impacts 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.

Daylight and sunlight

- 9.2 This section assesses the impact of the proposed development at 120 Holborn on the daylight and sunlight received by neighbouring properties. The assessment is based on the technical report prepared by Point 2 Surveyors Ltd (September 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.
- 9.3 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.

- 9.4 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The Development Plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 9.5 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

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

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

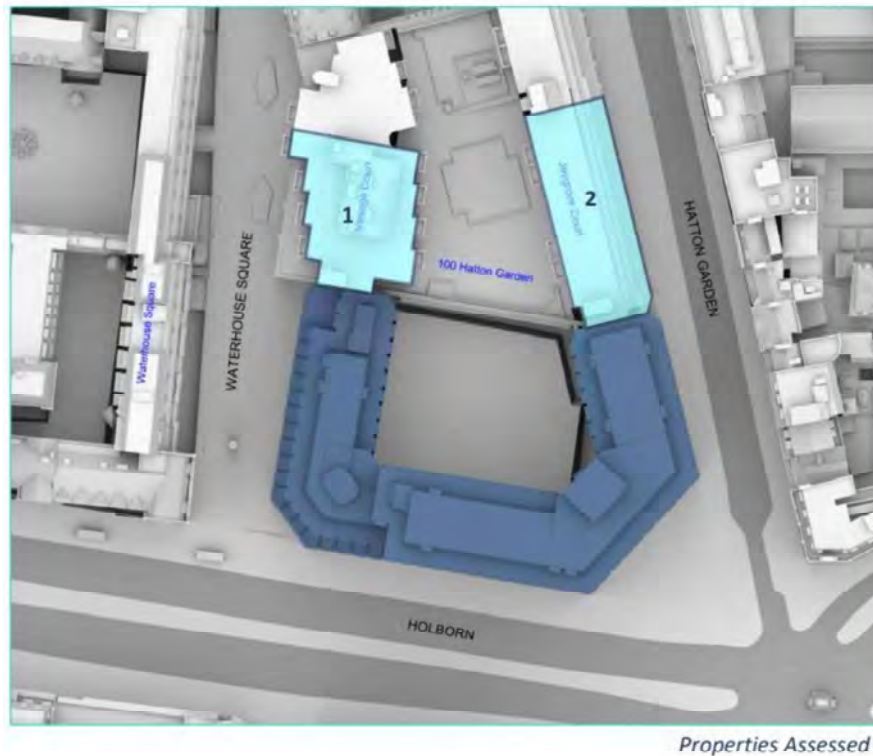
BRE compliant =< 20%	20.1% to 30% reduction	30.1% to 40% reduction	More than 40.1% reduction
Negligible	Minor adverse	Moderate adverse	Major adverse

Table 4 – Categorisation of magnitudes of effect

- 9.8 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like central London or Growth Areas. As a result, it recommends a flexible approach or setting alternative targets which take account of relevant local context.
- 9.9 In these relatively dense urban locations, a retained VSC value of 15-20% VSC can often be considered an acceptable level of retained daylight. The area is in Central London, in a dense urban environment with some narrow streets – as such a retained target of around 15%-20% VSC is often considered reasonable in these contexts. The targets are also consistent with those that have been applied to other schemes in Camden.

Assessment

- 9.10 Two residential sites were identified within the Sunlight & Daylight Assessment as being within the vicinity of the development and potentially affected. These are Vesage Court (marked 1 below) and Jeygrove Court (marked 2 below).



1. Vesage Court
2. Jeygrove Court

Vesage Court:

- 9.11 This property is located directly to the north of the Site and is in retail use at ground and 1st floor with residential apartments located on the floors above from the podium upwards:

Vesage Court (Property no. 1)



- 9.12 In terms of daylight, the results of the Vertical Sky Component (VSC) analysis demonstrate that all 84 habitable windows assessed would comfortably meet the BRE recommendations. Whilst most windows would notice a reduction

from the existing levels, the relative changes would range 0.1% - 9.0% which is comfortably within the BRE recommended 20% change, so the effects will not be noticeable.

- 9.13 In terms of daylight measured by the No Sky Line, again all 82 rooms would comfortably meet the BRE recommendations. 62 of these rooms would experience no change at all or a very slight increase from the existing levels. The remaining 20 rooms would experience relative changes of 0.1 - 7.0% so would again comfortably fall within the BRE recommended 20% change so will not be noticeable.
- 9.14 In regard to sunlight, the Annual Probable Sunlight Hours results also demonstrate that all 42 southerly orientated main habitable rooms (i.e. the living areas) would all meet the BRE recommendations. 27 of these would experience no change whatsoever from the existing conditions. The remaining 15 rooms would only experience small changes in sunlight levels (1 - 2% absolute APSH). This is well within the 4% APSH recommended by the BRE so will not be noticeable.
- 9.15 It is demonstrably the case that the effects to Vesage Court will all fall within the BRE recommendations, even when the effects of the balconies are considered. Therefore, any effects caused by the proposed development will not be noticeably by the occupants.

Jeygrove Court:

- 9.16 This property is located directly to the north of the Site and is in retail use at ground floor with residential apartments located on the floors above which face towards the site:

Jeygrove Court (Property no. 2)



- 9.17 A number of windows serving the property are overhung by balconies. Where this is the case, paragraph 2.2.13 of the BRE states: *“Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving*

direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations, without the balcony in place. For example, if the proposed VSC with the balcony was under 0.80 times the existing value with the balcony, but the same ratio for the values without the balcony was well over 0.8, this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light.'

- 9.18 In terms of daylight, measured by the Vertical Sky Component (VSC), the report indicates that 47 of the 72 windows which were assessed would meet the recommended BRE guidelines. Of the 25 windows which would not achieve recommended VSC levels, 19 are overhung by balconies and 6 are overhung by the 7th floor which cantilevers over the 6th floor. Essentially, it is these overhangs which account for the low levels of daylight both pre and post development. The absolute changes in VSC levels experienced at the windows overhung by balconies would only be small (between 0.3%-1.8% in absolute terms) which is unlikely to appear noticeable to the occupants in reality.
- 9.19 By way of example, it can be seen that, under the existing scenario (i.e. owing to the 7th floor overhang) the absolute VSC levels on the 6th floor are low, and the subsequently reduced, low VSC levels are largely due to the overshadowing effects of the balconies:


<div>  <div> DAYLIGHT ANALYSIS 120 HOLBORN, LONDON, EXISTING VS PROPOSED SCHEME 01/07/25 </div> </div>						
Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R5/76	BEDROOM	W7/76	2.31	1.71	0.60	25.97
R6/76	BEDROOM	W8/76	2.73	1.99	0.74	27.11
R7/76	LIVINGROOM	W3/76	1.92	0.75	1.17	60.94
R8/76	BEDROOM	W10/76	2.27	1.30	0.97	42.73
R9/76	BEDROOM	W9/76	3.32	2.36	0.96	28.92
R10/76	LIVINGROOM	W4/76	1.97	0.59	1.38	70.05
R11/76	BEDROOM	W11/76	5.14	3.48	1.66	32.30
R12/76	BEDROOM	W12/76	5.39	3.64	1.75	32.47

Table to show existing and proposed 6th floor level VSC daylight levels (with existing balconies/overhangs included)

- 9.20 With the 7th floor overhangs removed from the analysis (below) it can be seen that the reductions in VSC levels to the 6th floor level windows are relatively much lower and much closer to the advice within the BRE guidelines that a reduction in VSC levels by up to 20% should not be readily perceived. But as already stated the very low value absolute changes in VSC that apply in this case are unlikely to have a perceptible impact in any event.

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R5/76	BEDROOM	W7/76	2.62	2.10	0.52	19.85
R6/76	BEDROOM	W8/76	2.98	2.35	0.63	21.14
R7/76	LIVINGROOM	W3/76	6.21	5.08	1.13	18.20
R8/76	BEDROOM	W10/76	3.88	2.93	0.95	24.48
R9/76	BEDROOM	W9/76	3.50	2.67	0.83	23.71
R10/76	LIVINGROOM	W4/76	6.85	5.55	1.30	18.98
R11/76	BEDROOM	W11/76	5.25	3.89	1.36	25.90
R12/76	BEDROOM	W12/76	5.49	4.05	1.44	26.23

Table to show existing and proposed 6th floor level VSC daylight levels (with existing balconies/overhangs included)

- 9.21 In terms of daylight measured by the No Sky Line, the results demonstrate that 44 of the 72 habitable rooms assessed would meet the BRE criteria with the remaining rooms experiencing relative changes that range between 21.5%-52.6%. 13 of the rooms to fall short of guidance are in use as bedrooms which paragraph 2.2.10 of the BRE Guidelines states “should also be analysed although they are less important”. The remaining 15 rooms are understood to be in use as living rooms which are all overhung by balconies.



NSL ANALYSIS

120 HOLBORN, LONDON, EXISTING VS PROPOSED
SCHEME 01/07/25

Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
R4/72	LIVINGROOM	150.9	61.5	40.8	20.8	33.8
R5/72	BEDROOM	120.9	54.3	44.2	10.0	18.4
R6/72	BEDROOM	120.7	61.0	47.5	13.5	22.1
R7/72	LIVINGROOM	150.9	67.4	36.7	30.7	45.5
R8/72	BEDROOM	120.9	80.1	55.2	24.9	31.1
R9/72	BEDROOM	120.7	73.2	54.2	19.0	26.0
R10/72	LIVINGROOM	150.9	64.7	32.6	32.1	49.6
R11/72	BEDROOM	120.9	93.5	64.4	29.1	31.1
R12/72	BEDROOM	120.7	96.8	66.7	30.1	31.1
R1/73	LIVINGROOM	150.9	69.6	50.3	19.2	27.6
R2/73	BEDROOM	120.9	40.5	32.6	8.0	19.8
R3/73	BEDROOM	120.7	39.9	39.8	0.1	0.3
R4/73	LIVINGROOM	150.9	71.5	52.8	18.7	26.2
R5/73	BEDROOM	120.9	59.9	49.6	10.3	17.2
R6/73	BEDROOM	120.7	70.5	53.6	16.9	24.0
R7/73	LIVINGROOM	150.9	97.5	48.9	48.6	49.8
R8/73	BEDROOM	120.9	98.5	63.8	34.6	35.1
R9/73	BEDROOM	120.7	87.8	61.7	26.1	29.7
R10/73	LIVINGROOM	150.9	97.2	47.7	49.5	50.9
R11/73	BEDROOM	120.9	116.5	75.0	41.5	35.6
R12/73	BEDROOM	120.7	118.9	79.5	39.4	33.1
R1/74	LIVINGROOM	150.9	79.1	56.8	22.3	28.2
R2/74	BEDROOM	120.9	45.2	39.2	6.0	13.3
R3/74	BEDROOM	120.7	42.1	42.1	0.0	0.0
R4/74	LIVINGROOM	150.9	82.6	61.2	21.4	25.9
R5/74	BEDROOM	120.9	62.4	55.1	7.2	11.5
R6/74	BEDROOM	120.7	73.8	60.9	12.9	17.5
R7/74	LIVINGROOM	150.9	139.6	66.7	72.9	52.2
R8/74	BEDROOM	120.9	100.1	74.9	25.2	25.2
R9/74	BEDROOM	120.7	90.7	71.1	19.5	21.5
R10/74	LIVINGROOM	150.9	139.1	66.0	73.1	52.6

Worst case NSL scenarios with existing balconies included

- 9.22 When the balconies are omitted the results demonstrate that 11 of the 15 living rooms would meet guidance with the development in place. So in the majority of instances, the balcony is the main factor in the relative light loss. The remaining 4 rooms would experience a relative change of between 25.7-29.5% so would only slightly exceed the guidance.



NSL ANALYSIS
120 HOLBORN, LONDON; EXISTING VS PROPOSED
SCHEME 20/02/25
WITHOUT BALCONIES

Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
R6/93	ASSUMED BEDROOM	118.6	117.3	117.3	0.0	0.0
R7/93	ASSUMED LD	171.2	170.4	170.4	0.0	0.0
R8/93	ASSUMED BEDROOM	118.6	117.3	117.3	0.0	0.0
R9/93	ASSUMED LD	171.2	170.4	170.4	0.0	0.0

Jeygrove Court

R1/72	LIVINGROOM	150.9	86.2	74.4	11.7	13.6
R2/72	BEDROOM	120.9	41.2	39.1	2.1	5.1
R3/72	BEDROOM	120.7	38.6	38.0	0.6	1.6
R4/72	LIVINGROOM	150.9	89.7	75.4	14.4	16.1
R5/72	BEDROOM	120.9	54.3	44.6	9.6	17.7
R6/72	BEDROOM	120.7	61.0	48.1	12.9	21.1
R7/72	LIVINGROOM	150.9	127.9	91.2	36.6	28.6
R8/72	BEDROOM	120.9	81.7	59.4	22.3	27.3
R9/72	BEDROOM	120.7	73.6	55.4	18.2	24.7
R10/72	LIVINGROOM	150.9	132.0	94.2	37.8	28.6
R11/72	BEDROOM	120.9	93.9	64.9	29.0	30.9
R12/72	BEDROOM	120.7	96.8	67.9	28.8	29.8
R1/73	LIVINGROOM	150.9	91.0	79.5	11.5	12.6
R2/73	BEDROOM	120.9	43.3	42.5	0.8	1.8
R3/73	BEDROOM	120.7	40.3	40.2	0.1	0.2
R4/73	LIVINGROOM	150.9	97.4	81.8	15.6	16.0
R5/73	BEDROOM	120.9	59.9	49.9	10.0	16.7
R6/73	BEDROOM	120.7	70.5	54.3	16.2	23.0
R7/73	LIVINGROOM	150.9	142.3	107.8	34.4	24.2
R8/73	BEDROOM	120.9	99.6	68.4	31.2	31.3
R9/73	BEDROOM	120.7	88.2	63.1	25.1	28.5
R10/73	LIVINGROOM	150.9	146.6	111.0	35.6	24.3
R11/73	BEDROOM	120.9	116.9	77.6	39.3	33.6
R12/73	BEDROOM	120.7	118.9	81.8	37.1	31.2
R1/74	LIVINGROOM	150.9	91.9	85.3	6.6	7.2
R2/74	BEDROOM	120.9	46.3	46.3	0.0	0.0
R3/74	BEDROOM	120.7	42.5	42.5	0.0	0.0
R4/74	LIVINGROOM	150.9	98.5	89.6	8.9	9.0
R5/74	BEDROOM	120.9	62.8	55.4	7.4	11.8
R6/74	BEDROOM	120.7	73.8	60.9	12.9	17.3
R7/74	LIVINGROOM	150.9	143.0	128.5	14.5	10.1
R8/74	BEDROOM	120.9	101.3	80.1	21.2	20.9
R9/74	BEDROOM	120.7	91.1	72.8	18.3	20.1
R10/74	LIVINGROOM	150.9	147.5	133.9	13.6	9.2

Corresponding NSL levels when existing balconies are excluded

- 9.23 In terms of sunlight, measured by Annual Probable Sunlight Hours, when the balconies are considered, each of the main living rooms orientated within 90 degrees of due south would meet the BRE guidelines. Whilst some small changes would be recorded, the change in APSH is less than 4% in absolute terms and therefore the BRE criteria will be met and the losses would not be noticeable.

Sunlight to external amenity space in Gamages Estate:

- 9.24 An assessment of the sunlight hitting the external courtyard within the Gamages Estate has been undertaken. The BRE guidelines recommend that neighbouring amenity spaces receive at least 2 hours of direct sun on March 21st. The results of the sunlight hours assessment indicate that 88.3% of the area receive at least 2 hours of sunlight on March 21st in the existing condition. This would only reduce very slightly in proposed development conditions to 84.5% comfortably meeting the BRE criteria. So the overshadowing effects would not appear significant and it would continue to retain very good levels of sunlight throughout the year, particularly for a courtyard located within a central urban area.

Conclusion on effects on sunlight and daylight

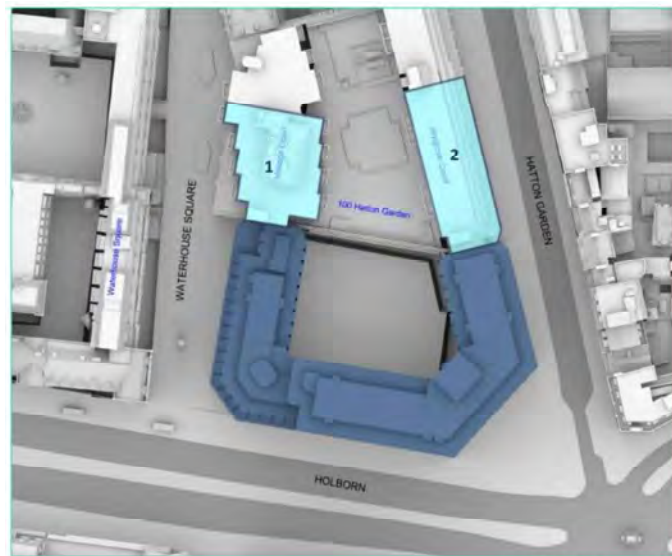
- 9.25 The results of the Sunlight and Daylight Report demonstrate that Vesage Court would fully adhere to the recommended BRE sunlight and daylight criteria and therefore there would be no adverse effects on this block. In respect of Jeygrove Court, a number of rooms and windows would experience changes that fall short of guidance in respect of daylight (VSC and NSL). Each of the affected areas receive very low levels of daylight currently as they are either overhung by balconies or overhung by a cantilevered floor. Therefore, they will always be sensitive to larger relative changes than the BRE recommends. Whilst the relative changes are in some cases well beyond the BRE recommended 20%, the change in absolute VSC levels is small (no more than 1.44%) which is unlikely to appear noticeable to the occupants. When the effects of the balconies are not considered, the majority of rooms and windows would then meet the BRE recommendations within Jeygrove Court. This demonstrates that in the majority of instances, it is the presence of the balcony, rather than the size of the obstruction which is a considerable factor in the relative light loss. The overshadowing analysis to the courtyard in the Gamages Estate demonstrates only a very minimal reduction with the areas still receiving 2 hours of sun on March 21st to well over half of its area. The space will therefore continue to comfortably meet the BRE recommendations and should appear well sunlit throughout the year.

Outlook

- 9.26 It is not considered that the proposals would result in any undue harm to the outlook of any neighbouring properties. As can be seen from the location plan (and Sunlight & Daylight Report plan) the adjoining flats in Vesage Court and Jeygrove Court are oriented east-west, while the site lies to the south of these flats:



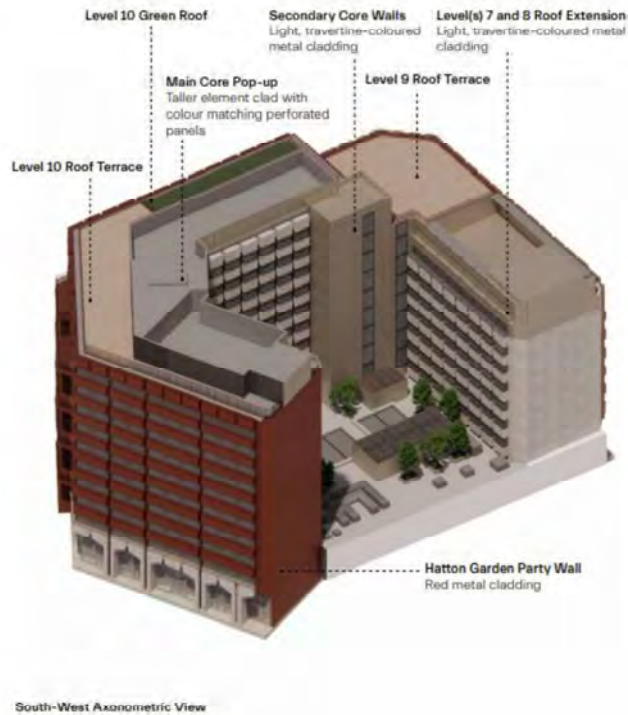
Site location plan



Properties Assessed

1. Vesage Court
2. Jeygrove Court

- 9.27 It is acknowledged that the height of the building is to be raised by way of upward extensions. An extension is also proposed in the south west corner of the courtyard, rising to the same height as the existing building.
- 9.28 The images below (from the Design & Access Statement) give a broad indication of the siting, scale and appearance of the proposed development in relation to Jeygrove Court and Vesage Court:



Broad indication of proposed development from Jeygrove Court



Broad indication of proposed development from Vesage Court

- 9.29 While it is acknowledged that the above images do not represent the exact situations from within properties in Jeygrove Court and Vesage Court, it is considered that they are helpful. Given the orientation and size and siting of the extensions, the proposed development would not be unduly overbearing or over-enclosing upon the flats within Gamages Estate and there would be no undue loss of outlook.

Noise / Disturbance

- 9.30 An acoustic assessment has been carried out to support the planning application for the proposed development at 120 Holborn.
- 9.31 Substantial new plant is proposed within the courtyard at the rear of the site. The MEP will have off-the-shelf acoustic enclosures with the proposal offering the potential for mesh and planting for the screens, proposing a more delicate visual impact within the courtyard.
- 9.32 A Plant Noise Assessment has been submitted. Appropriate noise guidelines have been followed. The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 9.33 The assessment indicates that the proposed mechanical plant installation should be capable of achieving the Camden's environmental noise criteria at the nearest and potentially most affected noise sensitive receptors with suggested noise mitigation.
- 9.34 The Council's Environmental Health Team is satisfied that, subject to conditions to control noise and vibration levels, the submitted acoustic submission and associated technical details meet Local Plan guidelines and are therefore acceptable in environmental health terms. The recommended noise control and anti-vibration conditions are attached accordingly.
- 9.35 The proposed floorspace/uses would not result in undue noise or disturbance harmful to the amenity of neighbouring occupiers. Situated within the Central Area, with other town centre, and particularly food and drink uses nearby, the proposed offices, including the 'hub'/competitive socialising space, retail/restaurant and jewellery workspace would not introduce unacceptable new noise. No new balconies are proposed within the courtyard which would result in undue overlooking or noise emissions for residents of Gamages Estate.

10. SUSTAINABILITY AND ENERGY

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

climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Redevelopment strategy

- 10.3 The Development Plan promotes circular economy principles and Local Plan policy CC1 and London Plan policy SI7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building and to optimise resource efficiency.
- 10.4 In this case, the existing building is being substantially retained. The works necessitate the removal of the building's existing stone cladding which has been the subject of an engineering report which has found that it cannot be sustained in safety terms or structurally. Furthermore, existing columns are to be removed to enable the use of the offices on the upper floors in accordance with current standards in terms of daylighting and improved energy efficiency in accordance with Development Plan climate change policies. The percentage of area to be demolished is around 15% compared to the existing floor area, and whilst the façade is being replaced as well as MEP, it is not considered to constitute substantial demolition, as defined under policy CC2 of the new (draft) Camden Local Plan, and as such, no justification is needed by way of a Condition and Feasibility Study or Circular economy Appraisal.

Whole Life Carbon

- 10.5 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building's life.
- 10.6 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square meter of gross internal area in kilograms of carbon equivalent (kgCO₂e/m² GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The table[s] below show[s] how the development performs against the benchmarks, as well as the aspirational targets.
- 10.7 The table below lists out the WLC metrics from the proposed development:

Modules	Min benchmark for OFFICE (kgCO₂e/m² GIA)	Aspirational Benchmark for OFFICE (kgCO₂e/m² GIA)	Proposal (kgCO₂e/m² GIA)
A1-A5	<950	<600	318
B-C (excl B6 & B7)	<450	<370	485

Total A-C (ex B6&B7 inc sequestration)	<1400	<970	803
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- 10.8 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation). This is also known as upfront embodied carbon.
- 10.9 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are “regulated emissions” and so are considered separately and in detail in relation to the zero-carbon target (see the “Energy and carbon reductions” section below).
- 10.10 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).
- 10.11 In this case, the development meets the benchmarks for A1-A5 and the overall benchmark of A-C (excluding B6 and B7, including sequestration). But it does not meet the benchmark for B-C (excluding B6 and B7). As such a condition is attached to make sure an updated WLC assessment is provided prior to commencement which should minimise whole life carbon emissions and achieve at least the benchmarks, unless it is clearly justified as not possible.
- 10.12 The applicant has committed to meeting the GLA targets of 95% reuse/recycling/recovery for construction and demolition waste, and 95% target of excavation waste putting to beneficial use. This will be secured by way of a condition.

Energy and carbon reductions

- 10.13 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).
- 10.14 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

Total carbon reductions

- 10.15 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021).
- 10.16 The submitted Energy Statement indicates an overall carbon reduction of 49%, which exceeds the requirement for 35% minimum on site. The refurbished portion of the building achieves a 50% overall, and the new build portion of the building achieves a 17% overall reduction which is far from the requirements.
- 10.17 An overall carbon reduction of 49% does not meet the requirement for net zero carbon and therefore a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.
- 10.18 The carbon offset amount has been calculated at £10,032. The carbon offset contribution is charged at £95/tonne CO₂/yr (over a 30-year period) which is 3.52 tonnes x £95 x 30 years = £10,032. This amount will be spent on delivery of carbon reduction measures in the Borough. This will be secured under the Section 106 legal agreement to bring it to net zero carbon, in compliance with the Development Plan.

Be lean stage (reduce energy demand)

- 10.19 London Plan policy SI 2 sets a policy target of at least a 15% (non-residential new build) reduction through reduced energy demand at the first stage of the energy hierarchy. There is no policy target for refurbished development, but to achieve the greatest possible reduction, meeting Part L2B for retained thermal elements.
- 10.20 In this case, the new build portion of the development would fall short of the new build policy target of (15% for non-residential), reducing emissions by 8.9% at this stage through energy efficient design. For the refurbished portion of the development, it achieves a 39% reduction at be lean stage. The proposals involve low U-values for the exposed walls, floors, roofs and windows for the new proposed façades. The glazing ratio of the typical floors has been kept at around 30% of the façade area, which will limit heat loss and excessive solar gains. Additionally, shading will be provided to the glazing areas through the façade design, which will limit unwanted solar gains in the hot months while benefiting from them in the cold months. The development intends to incorporate low energy light fittings throughout. The mechanical ventilation for the building will be provided by air handling units equipped with heat recovery and ventilation rates will be controlled to adapt to the level of occupancy of the building.

Be clean stage (decentralised energy supply)

- 10.21 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- 10.22 A space in the development has been allowed for potential future connection point to a District Heating Network, this is shown on drawing 1312-GDM-XX-XX-DR-M-6411 which is included within the Energy Statement. The future proofing of the connection to the District Heating Network shall be secured within the S106 agreement.

Be green stage (renewables)

- 10.23 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. Renewable and low carbon technologies are proposed in the shape of air source heat pumps (ASHPs) to provide the space conditioning to the main areas and the DHW to the shower facilities on ground floor, as well as photovoltaic (PV) panels on the available roof areas. The total area of PV panels considered feasible at this stage is 130 m². A 17% CO2 reductions is calculated from the green renewable technologies, which does not meet the 20% policy requirement. The quantum and performance of the PV panels will be secured by way of a planning condition, with the aim of maximising Solar PVs, which will ensure that at least 17% in CO2 reductions is achieved.

Be seen (energy monitoring)

- 10.24 The proposed refurbishment at 120 Holborn will be designed with sub-metering to enable post construction monitoring. Additionally, the 'Be Seen' methodology has been used to report on Energy Use Intensity (EUI) of the proposed development. The Energy and Sustainability Strategy which will be secured by Section 106 legal agreement will require monitoring and reporting to ensure that the actual carbon performance of the development is aligned with the Mayor's net zero carbon target.

Climate change adaption and sustainable design

- 10.25 Local Plan policy CC2 expects non-residential development to meet BREEAM Excellent. The BREEAM pre-assessment shows an 'Excellent'

rating with a score of 83%. Furthermore, it meets the individual Local Plan Policy targets of 60% of available credits for energy (85.7% targeted), water 60% (88.8% targeted), and 40% for materials (84.6% targeted).

- 10.26 The Sustainability Plan which will be secured under the S106 agreement will require the submission and approval of a BREEAM post construction assessment to confirm an Excellent BREEAM rating and compliance with Camden's BREEAM targets for energy, water and materials.
- 10.27 In accordance with Policy CC2 (Adapting to climate change) of the Local Plan, the Council discourages active cooling, and developments should instead minimise use of energy and employ passive design measures to regulate temperature. Air-conditioning units are only permitted where thermal modelling demonstrates that there is a clear need for it after all preferred measures are incorporated in line with the London Plan cooling hierarchy. In addition, passive measures should be considered first. If active cooling is unavoidable, applicants need to identify the cooling requirement and provide details of the efficiency of the system.
- 10.28 The mitigation of overheating has been considered through the implementation of the cooling hierarchy where feasible, supported with overheating analysis and dynamic thermal modelling exercises.
- 10.29 The Council's Sustainability Officer has requested the adoption of a refrigerant with a lower Global Warming Potential for the proposed heating, ventilation, and air conditioning system. This has not been addressed to date. A condition to secure an updated heating, ventilation, and air conditioning (HVAC) strategy with the aim to achieve the highest feasible environmental standards and demonstrate that refrigerants with the lowest Global Warming Potential (GWP) and overall environmental impact will be used is considered to be reasonable and is duly attached.

11. AIR QUALITY

- 11.1 An Air Quality Assessment has been submitted. An Air Quality Management Area (AQMA) covers the area.

Construction effects on air quality:

- 11.2 An assessment of the impact of the development during the construction phase has been undertaken. This has the potential to lead to fugitive dust emissions in the absence of appropriate mitigation. Based on the risk of dust impacts and the sensitivity of the site, mitigation appropriate to a medium risk site is recommended. The Assessment recommends that mitigation should be included in a Construction Management Plan. This will be secured under a S106 agreement. With the mitigation in place, construction dust effects are not expected to result in significant effects on local receptors.

- 11.3 The proposed development's energy strategy on a day-to-day basis will be based on electric energy sources. An emergency diesel generator which uses Hydrotreated Vegetable Oil is however being proposed. Details of the generator such as the flue/exhaust, the air inlet locations, maintenance and cleaning of the systems in accordance with manufacturer specifications and details of emission certificates are to be secured by way of a condition which is duly attached.

Operational effects of proposed development in local area:

- 11.4 The proposed development is considered to be car-free with the exception of disabled accessible parking and spaces leased to wider tenants/properties outside the scope of this application. The Transport Assessment states that “the servicing demand of the proposed development is anticipated to remain similar to existing levels due to the relatively minor change in floorspace at the site. The proposed development would therefore result in a net vehicle trip reduction when compared with the existing use. The road traffic impacts of the vehicles using the proposed development car park and the associated effects on local air quality are therefore considered not significant.
- 11.5 The ADMS roads model has been used to determine the impact of emissions from road traffic on sensitive receptors at the development. Predicted concentrations have been compared with the air quality objectives and targets relevant for the development's expected opening year of 2028. The results of the assessment indicate that NO₂, PM₁₀ and PM_{2.5} concentrations are below the objectives in the future first occupation year. As such, it is not considered that future air quality conditions would be excessive at the site.
- 11.6 The Council's Sustainability has recommended a condition in respect of the mechanical ventilation (system and inlets). This is to ensure that the system is appropriately designed and sited with respect to air intake. The condition is attached accordingly.

12. TRANSPORT

Site location and access to public transport

- 12.1 The site is located within the Hatton Garden Conservation Area to the north of Holborn (A40). The site is bounded by Waterhouse Square to the west, Hatton Garden to the east, Greville Street to the north and Holborn to the South. Holborn forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is also near Farringdon Road, which is part of TfL's Transport for London Road Network (TLRN).

- 12.2 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent).
- 12.3 The closest London Underground stations to the site are Chancery Lane, located approximately 350m west, and Farringdon, located approximately 400m to the north-east of the site, respectively. Farringdon station also provides national rail and Elizabeth Line services.
- 12.4 The closest bus stops to the site, Holborn Circus/Fetter Lane, are located on Holborn outside the site.
- 12.5 The site is accessible from the Strategic Cycle Network with Cycleway C6 to the east at Farringdon Road and C11 to the west at Red Lion Street. Both Cycleways link the site with Euston railway station.
- 12.6 The nearest Santander cycle hire docking stations are located on Red Lion Street, Holborn Circus adjacent to the site, New Fetter Lane, and Hatton Garden. These locations also offer dedicated parking bays for dockless rental e-bikes and rental e-scooters. However, these bays are already showing signs of overcapacity and increasing demand.
- 12.7 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows grades between 1b and 5 in the vicinity of the site, which indicates significant 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 were appropriate.

Trip generation

- 12.8 The anticipated multi-modal net increase in person trips generated by the office floorspace uplift of 2,158sqm GIA was calculated using trip rates obtained from TRICS and the modal share from 2011 Census. The results for the AM and PM peaks are presented in the Table 5.10 of the Transport Assessment and reproduced here:

Table 6.3: Multimodal Trip Generation – Office Uplift						
Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Underground	18	2	19	1	17	18
Train	21	2	22	1	19	20
Bus	6	1	7	0	6	6
Taxi	0	0	0	0	0	0
Motorcycle	1	0	1	0	1	1
Car Driver	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0
Bicycle	5	1	6	0	5	5
Walk	3	0	3	0	3	3
Total	54	5	59	4	50	54

- 12.9 Based on other developments in the area, the anticipated high volume of the walking trips is likely to be made from London Underground stations at Chancery Lane and Farringdon, the bus stops on Holborn Circus/Fetter Lane, and nearby bus stops, and commercial, entertainment, shopping, and restaurant venues in Holborn.
- 12.10 Considering the increase in active travel to and from the site, the applicant will be requested to provide a financial contribution towards projects which form part of the CTS delivery programme outlined in paragraph 1.6.
- 12.11 An Active Travel Zone (ATZ) assessment included in the TA focuses on six routes to key destinations. The analysis identifies opportunities to improve the walking and cycling environment, which is particularly relevant given the Council's commitment to implementing the Safe & Healthy Streets programme in the Hatton Gardens area.

Travel planning

- 12.12 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. Modal share projections for walking and cycling are acceptable.
- 12.13 A Travel Plan and associated monitoring and measures contribution of £11,348 will be secured by legal agreement if planning permission is granted.

Access and permeability

- 12.14 Pedestrian access will remain from the site frontage on Holborn and Holborn Circus in line with the existing arrangements. Cycle access will be provided from Hatton Garden. Vehicular access into the site for parking and servicing is retained from Greville Street.

Cycle parking

- 12.15 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG 7, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for all land uses.
- 12.16 381 long-stay spaces will be provided in the basement, accessed from Hatton Garden, comprising:
- 251 two-tier spaces (65%)
 - 76 Sheffield stands (20%)
 - 35 foldable bike lockers (10%)
 - 19 as accessible spaces (5%).
 - 6 visitor cycle parking spaces required in relation to the office uplift.
- 12.17 A financial contribution of £1,800 will be required towards providing 3 Sheffield stands on the public highway. Officers will determine the most suitable location close to the site. This will be secured by S106 legal agreement.
- 12.18 Final details of the on-site bike parking will be secured by condition.

Car parking and vehicle access

- 12.19 The site is located in controlled parking zone CA-D, which operates 08:30-13:30 Monday to Friday and 08:30-13:30 on Saturday.
- 12.20 The development is proposed car-free, which would be secured by S106 legal agreement if planning consent were granted. There are 22 car parking spaces within the application site (in the basement). These are leased to LBC residents, along with the 4 No. parking spaces located within the lower ground floor, which are leased to buildings within the wider ownership. As these are within the application site it will be written into the S106 agreement that these spaces will not be used by any occupiers or users at the site.
- 12.21 Two accessible parking spaces will be provided. One of these spaces will be fitted with fast-charge electric vehicle charging, while the second space will have 'passive' provision for potential future installation.

CPZ Review

- 12.22 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.'

- 12.23 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.
- 12.24 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, consultation, and (subject to that consultation) implementation/monitoring of any changes, the review of which started in 2025/26.

Construction management

- 12.25 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/Demolition Management Plan using the Council's CMP pro-forma is provided in support of the planning application. However, in absence of a principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly.
- 12.26 The site is located on Holborn (A40), which forms part of the Strategic Road Network (SRN) and is near strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. More detailed Demolition Management

Plan (DMP) and Construction Management Plan (CMP) documents will therefore be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

- 12.27 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.
- 12.28 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.
- 12.29 The development will require significant input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.
- 12.30 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.
- 12.31 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by legal agreement if planning permission is granted.

Deliveries and servicing

- 12.32 The proposed servicing strategy will continue in-line with the existing arrangements, utilising the loading bay at lower ground floor level, which is operational Monday-Friday between 7am to 8pm, and on Saturday and Sunday, between 8am to 5pm. All deliveries must be booked in 24 hours advance, including full details on vehicle type, tenant visited, and details regarding the delivery. Vehicle access from Greville Street is gated and is managed by the Site Management Team. The proposed office uplift is forecast to generate approximately 2-3 extra daily deliveries.
- 12.33 A detailed Delivery and Servicing Plan would be secured by S106 legal agreement if planning permission were granted.

Highway works

- 12.34 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. A highways contribution of £20,000 will

therefore be required by legal agreement if planning permission is granted. Any unspent funds will be returned to the applicant, per usual practice.

Public realm

- 12.35 There is a welcome aspiration to deliver significant public realm and landscaping improvements adjacent to the main building entrance. The triangular space at the corner of Hatton Garden and Holborn is proposed to be improved through the delivery of:
- improved step-free access including full DDA-compliant ramps to the office entrance;
 - enhanced tree planting, low level planters, and urban greening; and
 - incorporation of benches to provide places to stop and rest.

Pedestrian, cycling and environmental improvements

- 12.36 Securing financial planning obligations from major developments towards transport improvement schemes is necessary to mitigate the impact of the development.
- 12.37 Given the site location in Holborn and in line with the anticipated increase in cycle and walking trips generated by the significant commercial uplift of the proposed development floor area, and further promoted by the Travel Plan, a financial contribution of £230,000 will be requested towards:
- timed “Healthy School Street” restrictions outside St Alban’s C of E Primary & Nursery School on Baldwin’s Gardens and Portpool Lane, approximately 300m north-west of the site;
 - Healthy Streets improvements in the Hatton Garden Area where the site is located – this being a key deliverable within the CTS Delivery Plan Safe & Healthy Streets programme;
 - Road safety and other upgrades to the junction of Holborn (A40) and Grays Inn Road (A5200) as part of the Council’s “Healthy Junctions” programme; and
 - Localised bus infrastructure/priority measures in the Holborn/Grays Inn Road area in alignment with our Better Buses programme.

- 12.38 This contribution, reflecting only the uplift, would be secured via a legal agreement should planning permission be granted.

Micro and shared mobility improvements

- 12.39 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.

- 12.40 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that a contribution towards this should be sought.
- 12.41 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

- 12.42 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.
 - Off-site cycle parking contribution of £1,800.
 - Car-free development.
 - 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 £20,000.
 - Pedestrian, Cycling and Environmental Improvements contribution of £230,000.
 - Micro and shared mobility improvements contribution of £10,000.

13. LANDSCAPING 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 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 A site based Ecology Survey has been undertaken. This has found that the site does not fall within 2km of any statutorily designated environmental sites. No impacts upon any designated nature conservation sites will result. A site walkover has also confirmed that, due to its central London location, lack of suitable roosting or nesting features, there is no potential for protected species to be present.
- 13.3 A Landscaping Strategy has been submitted and there are three main areas of new landscaping/biodiversity provision:

Hatton Garden Public Realm:

- 13.4 The proposals include the provision of new public realm in the form of landscaping/planting the under-used triangular paved area in front of the building at the Hatton Garden/Holborn junction. The introduction of extensive planting areas and furniture will enhance the experience of the entrance to Hatton Garden and 120 Holborn and create opportunities for the public to dwell off the busy street. The public realm will provide space for different users, those using, visiting and working at 120 Holborn and the general public that are in the area:



Public Realm - Render Plan

Roof Terraces Level 10 Design:

- 13.5 The roof garden located on level 10 will provide space for all occupants of the building to share:



- 13.6 The Council's Open Spaces Team has reviewed the Landscaping Strategy. The proposals are considered to be positive. Advice was given regarding drainage into the planted zones (demonstrating best practice surface water management) and trees which can grow to a significant height at maturity to anchor the space and provide the maximum ecosystem services for the surrounding area, acknowledging that triangle area is like to have zones with minimum utility and services constraints (compared to the public highway) as it is privately owned. It was also noted that tree selection is the best tool to address this effectively through the provision of shade.
- 13.7 The Landscape Strategy confirms that the development would have an Urban Greening Factor of 0.3 (in accordance with policy LG5 of the London Plan).

Biodiversity Net Gain:

- 13.8 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 13.9 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.
- 13.10 This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits. There are statutory

exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply.

- 13.11 The applicant is directed to the BNG legislation by way of recommended informatives (see below) and a condition is attached to secure details of landscaping in the interests of ensuring a satisfactory provision of biodiversity.
- 13.12 With respect to trees, the new planting on the upper floors is welcomed and the ground floor public realm planting includes replacement trees. The emphasis should be on drought tolerance and future shade provision. The landscaping condition will secure appropriate numbers, positions and species.
- 13.13 No details have been submitted in relation to the protection of existing trees, for example on the open space in front of the building. A condition is attached in respect of the submission, approval and implementation of any requisite tree protection measures.
- 13.14 Overall, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan.

14. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 14.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is more than 1,000sqm or £3m 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.

Construction Phase

- 14.2 Apprenticeships - as the build cost for this scheme will likely exceed £3 million the applicant must recruit 3 construction apprentices paid at least London Living Wage per £3million of build costs and pay the Council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises. Recruitment of construction apprentices should be conducted through the Council's Euston Skills Centre.
- 14.3 Construction Work Experience Placements - The applicant should provide a set number of work experience placements (this is one placement per 500 sq m of employment floor space) 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, as per section 69 of the Employment sites and business premises CPG. With an uplift of 1,181 sqm commercial Class E floor space, this would be 2 work experience placements

- 14.4 Local Recruitment – The Council's standard local recruitment target is 20%. The applicant should work with the Euston Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely (i.e. CWF as they've stated).
- 14.5 Local Procurement – The applicant must also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. The Council's local procurement code sets a target of 10% of the total value of the construction contract.

End Use / Occupation Phase Opportunities:

- 14.6 Sections 72-75 of the CPG set out the Council's expectations about employment in the completed development. This applies for developments with an increase of 1,000sqm or more in employment space
- 14.7 The Council will require a 2 end use apprenticeships through the S106 agreement on a rolling term of 5 years for the future occupier of the employment space. This should be conducted through Camden Future Talent.
- 14.8 The developer and future office occupiers should also confirm their commitment to ensuring the site offers local employment benefits in the long term by:
- Working with Camden Learning/STEAM on school engagement if applicable (depending on the future tenants)
 - Joining the Council's Inclusive Business Network and promoting this and good employment practice.
 - 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.

Section 106 Contribution

- 14.9 Section 73 of the CPG provides for a Section 106 contribution to be used by the Inclusive Economy service to support employment and training activities and local procurement initiatives. This approach is supported through policy E2 of the Local Plan and applies to major commercial developments which will result in a net increase of 1,000sqm (GIA) or more of employment space. There is an overall uplift of floor space of 1,181 sq m.
- 14.10 This contribution would be calculated as follows:

- Net increase in floor space (sq m GIA) / 12 sq m [space requirement per full time employee] = full time jobs created Full time jobs created x 21% [% of Camden residents who work in Camden] x 35% [% of employees requiring training] x £3,995 [£ per employee requiring training)
- Net increase in floor space (sqm GIA) 1,181 sq m / 12 sq m [space requirement per full time employee] = 98 full time jobs created
- Full time jobs created 98 x 21% [% of Camden residents who work in Camden] = 21 jobs for Camden Residents
- 21 x 35% [% of employees requiring training] = 7 employees who need training
- 7 x £3,995 [£ per employee requiring training] = £27,965 employment and training contribution.

15. WASTE/RECYCLING STORAGE AND COLLECTION

- 15.1 A Waste Strategy including waste collection and waste management measures has been submitted. Waste will continue to be stored at lower ground level within the loading bay, which has capacity for:
- 5 x 1,100L Eurobins for general waste.
 - 4 x 1,100L Eurobins for recycling.
 - 3 x 240L bins for glass.
 - 3 x 1,100L Eurobins for cardboard.
 - 2 x 240L bins for food waste.
 - 1 x cardboard baler
 - 1 x bin press
- 15.2 The waste collection strategy will remain unchanged with a private waste contractor collecting general & mixed recycling collection three times a week and glass, food, and cardboard once a week. Collections will be pre-arranged and scheduled to avoid peak pedestrian and commuter periods associated with nearby public transport nodes.
- 15.3 It is also proposed that the additional waste storage is provided as follows:
- 1 x 1,100L for dry mixed recycling.
 - 1 x 240L bins for general waste.
 - 1 x 240L bin for food
- 15.4 Waste will be managed in accordance with the waste hierarchy.
- 15.5 The Waste Strategy will be secured as an approved document under the 'approved drawings and documents' condition.

16. FIRE STATEMENT

- 16.1 Policy D12 of the London Plan requires a Fire Statement to be submitted with fire safety measures to comply with the functional requirements in Part B of the Building Regulations 2010.
- 16.2 A Fire Statement (by the Fire Surgery) has been submitted.
- 16.3 The key fire safety objective of satisfying the Building Regulations performance requirements has been demonstrated. The fire safety guidance documents used have been identified as BS 9999:2017. The building materials comprise a concrete and steel structure, with cladding formed from a mix of retained stone and folded aluminium rain screen with aluminium windows and concrete primary structure. The materials will have a reaction to fire rating of B-s3, d2 or better and insulation and filler materials will be of A2-s1,d0 or better fire performance.
- 16.4 The safe means of escape has been documented. Sufficient stair capacity is available for all occupants to escape via the available escape routes. The means of escape for mobility impaired occupants will be available via the use of lifts for evacuation. This will include any occupants that are unable to use the stairs for escape, and the capacity of the lifts will be designed to accommodate escape within an appropriate period, to satisfy the London Plan Policy D5(B5).
- 16.5 Passive and active systems have been identified for the building, including compartmentation to separate fire risks and protect escape routes, sprinkler protection throughout, and systems to support firefighting, such as basement smoke ventilation and pressurisation.
- 16.6 The access and facilities for the fire service have been established including vehicle access to the building and access to the building via protected firefighting shafts. Existing fire hydrants are available on the surrounding streets, including the nearest hydrant directly adjacent to the building. Dry coverage throughout.
- 16.7 The consistency in fire safety has been demonstrated to meet the Golden Thread by virtue of The Fire Surgery's involvement in the development of the fire strategy and the expected future appointments through construction to support Regulation 38 of the building regulations and allow the users of the building to execute their responsibilities for fire safety under the Regulatory Reform (Fire Safety) Order 2005 which is the legislation for fire safety in occupied buildings.
- 16.8 The fire statement meets the requirements of the London Plan Policy D5 and D12 and outlines how the project is expected to meet the requirements of

the relevant Building Regulations. A condition is to be attached to secure the implementation of the Fire Strategy.

17. CRIME IMPACT ASSESSMENT

17.1 In keeping with the National Planning Policy Framework (NPPF), London Plan Policy 2021, Planning Policy Statement 1 (PPS1) a Crime Impact Assessment is submitted to demonstrate the steps that will be taken to deter crime by:

- Reducing the ease of identification of vulnerable assets or material
- Making it harder to commit a crime without detection
- Making it easier to identify a criminal act
- Reducing the likelihood of escape without detection
- Increasing the likelihood of being successfully prosecuted
- Reducing the impacts of terrorism and unlawful acts of violence

17.2 To develop appropriate design modifications to create the crime prevention approach and development profile, appropriate to the threat and vulnerabilities of the development, the Crime Impact Assessment indicates the use of police crime prevention, statistical resources, and advisory materials as well as reference to local Designing Out Crime Officer (DOCO) and Counter Terrorism Security Advisors (CTSA).

17.3 The Crime Impact Assessment also advises that a comprehensive security management plan should be prepared and remain in-situ for the day-to-day operational and management lifecycle of the development. This should include periodic reviews to ensure that the content remains accurate, workable and up-to-date.

17.4 A condition is to be attached to the planning permission to ensure that the development achieves 'Secure-by-Design' certification and that it is undertaken accordingly.

18. FLOOD RISK ASSESSMENT

18.1 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.

18.2 A Flood Risk Assessment and Drainage Strategy has been provided as part of this submission. Whilst there is a low risk of fluvial and sewer flooding, there is potential of groundwater and surface water flooding at the site. The rear terrace and basement of the development is identified as a potential location of flooding. Natural drainage is proposed to the terrace (i.e. green surfaces and planting). Rainwater harvesting and an attenuation system is

proposed to be located underneath the basement access ramp. Green/blue roofs are also proposed on the ninth and tenth floors to reduce water run-off rates.

- 18.3 The Lead Local Flood Authority has been consulted and following the submission of further information on the location of discharge points and discharge rates from the site, and confirmation that no flooding will take place in a 30-year rainfall event, and there will be no flooding of buildings in a 1 in 100 year + 40% CC event. The drainage strategy will aim to achieve a total maximum surface water discharge rate from the site of 2 l/s, which is close to the greenfield runoff rate. The proposed rate will be confirmed once the blue roofs and rainwater harvesting/attenuation system are finalised; hence, a condition has been put in place to secure details of the SuDS proposal. There should be no undue flood risk as a result of the development.
- 18.4 Details of flood evacuation routes have been provided.
- 18.5 Conditions are attached to ensure that the recommended SUDS measures are provided, that appropriate rainwater/greywater harvesting takes place and that a full Flood Risk Emergency Plan is approved and implemented. A 'blue/green roofs' condition is also attached to ensure that the blue and green roofs are of an appropriate specification to achieve the reduced water run-off rates.

19. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 19.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.
- 19.2 The CIL estimates which have been provided to date are: Retail: £274,998.08; Other commercial: £52,694.24.

20. CONCLUSION

- 20.1 The proposed development would comply with the London Plan and Camden Local Plan policies for land use and growth in the Central London Area and it would include 591 sqm of affordable jewellery workspace in accordance with the Local Plan policy requirement for new commercial development in Hatton Garden.
- 20.2 The remodelling of the ground floor and the extensions and alterations to the elevations including remodelled window bays, re-cladding metal and new balconies would be appropriate to the context and character of the area and would not in officers view harm the significance of the Conservation Area or the neighbouring Grade II* Listed building (Waterhouse Square) (noting that

Historic England's view is that there is less than substantial harm at the lower level of the scale). Furthermore, the proposed paving, landscaping and street furniture works on the space in front of the building onto Holborn Circus would enhance the amenity of users of the building and visitors to the area, enhance the appearance of the townscape and contribute to the 'Holborn Vision'.

- 20.3 No neighbouring occupiers would be unduly affected in terms of loss of light, privacy or outlook. Analysis has been undertaken of the effects on sunlight and daylight to Jeygrove Court and Vesage Court in the 'Gamages Estate'. Daylight and sunlight levels would in most cases remain compliant. Where light levels are below industry standards it is due to overhanging balconies and cantilevered upper floors. The reductions in natural light as a result of the proposed extensions would not be noticeable within the rooms in question which are already overhung by the existing balconies and cantilevered seventh floor.
- 20.4 Subject to a Servicing & Delivery Management Plan, Construction Management Plan and contributions to off-site cycling, highway works and pedestrian improvements in the area (all to be secured in a S106 agreement), the development would not prejudice the transport infrastructure. The S106 agreement would also secure the provision of appropriate employment and training contributions and a carbon off-set contribution to equivalent carbon zero technologies in the Borough.
- 20.5 The proposals are not considered to result in any harm to the significance of any heritage assets, but were members to take a different view, the NPPF advises that any public benefits should be taken into consideration when deciding whether to grant permission. The public benefits arising from the development in the shape of public realm improvements, improved retail facilities, new affordable jewellery workspace (591 sqm), additional competitive socialising/'Hub' space and urban design/landscaping/biodiversity provisions would outweigh any impact on the significance of the heritage assets.

21. RECOMMENDATION

- 21.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:
- Travel Plan and associated monitoring and measures contribution of £11,348.
 - Off-site cycle parking contribution of £1,800.
 - Car-free development (Existing basement car parking spaces to be used by neighbouring residents (22) and neighbouring businesses (4) only)
 - 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 £20,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £230,000.
- Micro and shared mobility improvements contribution of £10,000.
- 591 sq m of affordable jewellery workspace at 50% of market rents in perpetuity (including a commercial space plan, delivery plan and marketing plan)
- 3 construction apprentices plus support fee (£5,100)
- 2 construction work experience placements
- 20% local recruitment
- Camden Local Procurement Code
- 2 end use apprenticeships
- Local employment benefits package (construction-phase)
- £27,965.00 employment and training contribution
- Energy and Sustainability Strategy including BREEAM (incl. future District Heating Network connection)
- Carbon offset contribution of £10,032
- Maintenance plan (open space)
- Retention of architect – Morris & Co

22. LEGAL COMMENTS

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

23. CONDITIONS

1 Time limit

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

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

2 Approved drawings

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

Existing Drawings:

05001, 05098, 05100, 05110, 05081, 05099, 05101, 05201, 05302, 05301, 05107, 05303, 05203, 05202, 05204, 05907, 06401

Proposed Drawings:

06080, 06097, 06098, 06099, 06100, 06101, 06102, 06106, 06108, 06109, 06110, 06201, 06202, 06203, 06204, 06301, 06302, 06303

Landscaping Drawings - 3653-PLA:

00-00-DR-L-001 P03, 01-00-DR-L-001 P05, 09-00-DR-L-003 P03, 10-00-DR-L-004 P03

Town Planning Statement, prepared by Newmark UK; Design and Access Statement, prepared by Morris+Company; Air Quality Assessment, prepared by Aether (Revision 02 - 02/06/2025); BREEAM Pre-Assessment, prepared by Greengage; BNG and Ecology Report (and Ecology Note), Biodiversity Net Gain Metric prepared by Greengage; Crime Impact Assessment, prepared by QCIC; Daylight, Sunlight, Overshadowing and Glare Assessment, prepared by Point 2; Energy Statement, prepared by Greengage (October 2025); GLA Carbon Reductions Spreadsheet (October 2025); Sustainability Statement, prepared by Greengage; Whole Life Carbon Assessment, prepared by Greengage; Whole Life Carbon Assessment Addendum & Spreadsheet, prepared by Greengage; Flood Risk Assessment, prepared by Webb Yates; Fire Statement, prepared by The Fire Surgery; Townscape, Visual Impact and Built Heritage Assessment (Including Local and LVMF Views), prepared by Tavernor Consultancy; Landscaping Statement, prepared by Planit; Noise Impact Assessment, prepared by Quantum; Construction/Demolition Management Plan Pro-Forma; Outline Construction Management Plan, prepared by Caneparo; SuDS Strategy, prepared by Webb Yates; Structural Report, prepared by Webb Yates; Statement of Community Involvement, prepared by Kanda; Travel Plan, prepared by Caneparo; Transport Assessment, prepared by Caneparo; Delivery, Servicing and Waste Management Plan, prepared by

Caneparo; Utilities and Foul Sewage Assessment, prepared by Webb Yates, Life Safety Generator Flue Location; Future District Heating Connection 1312-GDM-XX-XX-DR-M-6411, Thermal Comfort Assessment, prepared by Greengage (October 2025).

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

3 External materials

Before the relevant part of the work is begun, detailed drawings, and/or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

a) Details, including plans, coloured elevations and sections at 1:20 of all new typical facade junctions (including at ground level, window / external door head and cill, at junction with roof and balconies); and

b) A mock-up of typical sections of the façade at 1:1 scale showing the metal panels and include a glazed opening, showing reveal and header detail, to agree details and the colour tone of the metal panels.

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

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

4 Details of landscaping

No development shall take place until full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. The soft landscaping details will include single-stemmed replacement trees (Note: All new trees must be tolerant of central London's changing climate) with details of soil cells to maximise tree pit volumes included. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.

5 Landscaping to be provided in accordance with approved details

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

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, A5, D1 and D2 of the London Borough of Camden Local Plan 2017.

6 Tree Protection details

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

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

7 Green roof details (Biodiversity)

Prior to commencement of development (other than site preparation and demolition), full details in respect of the green roofs in the area indicated on the approved roof plan shall be submitted to and approved by the local planning authority. The details shall include species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long-term viability of the green roof, as well as details of the maintenance programme for green roof.

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

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in

accordance with policies G1, CC1, CC2, CC3, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.

8. Emergency generator details

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

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

9. Details of air inlet locations

Prior to commencement of the development (other than site preparation and demolition), full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads, generator flue, and the boiler/ CHP stack or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

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

10. Feasibility/details of PV panels

Prior to commencement of development (other than site preparation and demolition), 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 (at least 130m²) and predicted energy generation capacity (at least 25kWp). The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

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

11. Flood Risk Emergency Plan

Prior to commencement of development (other than site preparation and demolition), a Flood Risk Emergency Plan shall be submitted to and approved by the Local Planning Authority in writing. The Flood Risk Emergency Plan must include proposed mitigation measures, and access and egress routes, and be in line with ADEPT guidance requirements on Flood Risk Emergency Plans. The systems approved under this condition shall thereafter be provided prior to first occupation and permanently retained and maintained in accordance with the approved details.

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

12. No 'permitted development' external alterations

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

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

13. Plant Noise Control

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 capacity and thereafter be permanently retained.

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 London Borough of Camden Local Plan 2017.

14. Plant anti-vibration measures

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

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

15. Noise control – Emergency Generator Plant

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.

The emergency plant and generators hereby permitted may be operated only for essential testing, except when required by an emergency loss of power.

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.

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 London Borough of Camden Local Plan 2017

16. SUDS Construction details

The sustainable drainage system as indicated in the Flood Risk Assessment and Drainage Strategy Report (Revision 07, 28/10/2025) 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 greenfield runoff rates or a maximum total rate of 2.0 l/s. The system shall include 265.96m³ of storage within blue roofs, green roofs and a rainwater harvesting system, as shown on the approved drawings. Prior to the commencement of the development, a lifetime maintenance plan demonstrating how the sustainable drainage system as approved will be maintained, must be submitted to and approved in writing by the local planning authority.

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

17. Evidence of SUDS installation

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

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

18. Rainwater / greywater harvesting

Prior to the commencement of the development (other than site preparation and demolition) details of rainwater recycling proposals with a proposed catchment of 730m² should be submitted to and approved by the Local Planning Authority in writing. The development shall thereafter be constructed and permanently retained in accordance with the approved details.

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 London Borough of Camden Local Plan.

19. Secure by Design

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

Reason: To ensure the security of the site and the surrounding area in accordance with policy C5 (Safety and Security) of the Camden Local Plan 2017.

20. Fire Safety

Prior to first occupation of the development hereby approved, the Planning Fire Statement (250723DN01F3 – The Fire Surgery 23/07/2025) shall be fully implemented and permanently retained thereafter.

Reason: To ensure the safety of occupiers in accordance with policy C5 (Safety and Security) of the London Borough of Camden Local Plan 2017.

21. Whole Life-Cycle Assessment

Prior to the stages outlined below, an updated version of the Whole Life Carbon Assessment must be submitted to and approved in writing by the local planning authority:

(a) Prior to commencement of any work on site including all works of deconstruction and demolition.

(b) Prior to commencement of any construction works.

Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 318kgCO₂e/m² and/or Whole Life Carbon (A1-C4) above 803kgCO₂e/m², which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised. You must not commence any work on site and/or construction

works (as appropriate pursuant parts (a) and (b) above) until we have approved the updated assessment you have sent us. You must then carry out works, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

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

22. Construction related impacts - Monitoring

Air quality monitoring should be implemented on site. No development shall take place until real time dust monitors appropriate to the dust risk have been installed:

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

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

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

23. Non-road mobile machinery

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

Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017, and policy GG3 and SI 1 of the London Plan.

24. Blue/green roof details (Drainage)

Prior to commencement of development (other than site preparation and demolition) details in respect of the blue/ green roof in the area indicated on the approved roof plan shall be submitted to and approved in writing by the local planning authority. Details of the blue/green roof provided shall include: catchment area, storage volume, drainage rate, species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green/blue roof. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

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

25. Environmental Impact of HVAC Systems

Prior to the commencement of development, excluding site clearance and preparation works, an updated heating, ventilation, and air conditioning (HVAC) strategy shall be submitted to and approved in writing by the Local Planning Authority. The proposals should aim to achieve the highest feasible environmental standards and demonstrate that refrigerants with the lowest Global Warming Potential (GWP) and overall environmental impact will be used, unless otherwise justified to the satisfaction of the Local Planning Authority. The approved details shall be implemented in full and maintained thereafter.

Reason: In reference to Camden Local Plan Policy CC1, to ensure the development minimises the effects of climate change and achieves the highest feasible environmental standards during construction and occupation.

26. Construction and Demolition Waste

Prior to the commencement of the development, a waste management plan shall be submitted to and approved by the Local Planning Authority (both in writing) demonstrating how 95% of construction and demolition waste will be reused/recycled/recovered on site and 95% of excavation waste used for beneficial purposes. The approved waste management plan shall thereafter be delivered in accordance with the approved details.

Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan and to reduce waste and support the circular economy in accordance with policy SI 7 of the London Plan 2021.

27. Reuse of façade materials

Prior to the commencement of the development, excluding site clearance and preparation works, details, including 1:10 plans and sections of typical facade elements, which are to be retained/reused on the building, such as the travertine panels, shall be submitted to and approved by the Local Planning Authority (both in writing). The development shall thereafter be undertaken in accordance with the approved details.

Reason: To safeguard the appearance of the development and to optimise resource efficiency in accordance with policies, D1, D2 and CC1 of the London Borough of Camden Local Plan.

28. Air Source Heat Pump not to be used for cooling

Prior to first use of the air source heat pump hereby approved, the active cooling function shall be disabled on the factory setting and the air source heat pump shall be used for the purposes of heating only.

Reason: To ensure the proposal is energy efficient and sustainable in accordance with policy CC1 and CC2 of the London Borough of Camden Local Plan 2017.

29. Cycle parking

The 'end of journey' bike storage and associated changing rooms on the proposed ground floor and proposed lower ground floor plans (drawings XX XX DR A 06080) shall be provided in their entirety prior to the first occupation of the development and permanently retained thereafter.

Reason: To provide a sustainable form of development which incorporates sustainable transport facilities in the interests of reducing congestion and increasing the risk of climate change in accordance with the LB Camden policies T1, T2 and CC1, the London Plan 2021 and NPPF 2024.

30. Waste Strategy

The waste/recycling facilities detailed in the Delivery, Servicing and Waste Management Plan Delivery and Servicing Plan (Caneparo Associated - July 2025) shall be provided prior to the first occupation of the development and permanently retained and managed in accordance with the Waste Strategy thereafter.

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

31. Urban Greening Factor

Prior to the occupation of the development, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate that the development achieves an Urban Greening Factor of 0.3.

Reason: To ensure a satisfactory level of green infrastructure in the interests of the amenity, biodiversity and sustainability of the development in accordance with policy LG5 of the London Plan 2024.

INFORMATIVES

1. Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
2. This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
3. All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)
4. 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. Biodiversity Net Gain (BNG) Informative (1/3):
5. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan.

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

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

Based on the information provided, this permission WILL require approval of a BGP before development is begun because none of the statutory exemptions or transitional arrangements summarised below are considered to apply.

6. Biodiversity Net Gain (BNG) Informative :

+ Irreplaceable habitat:

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

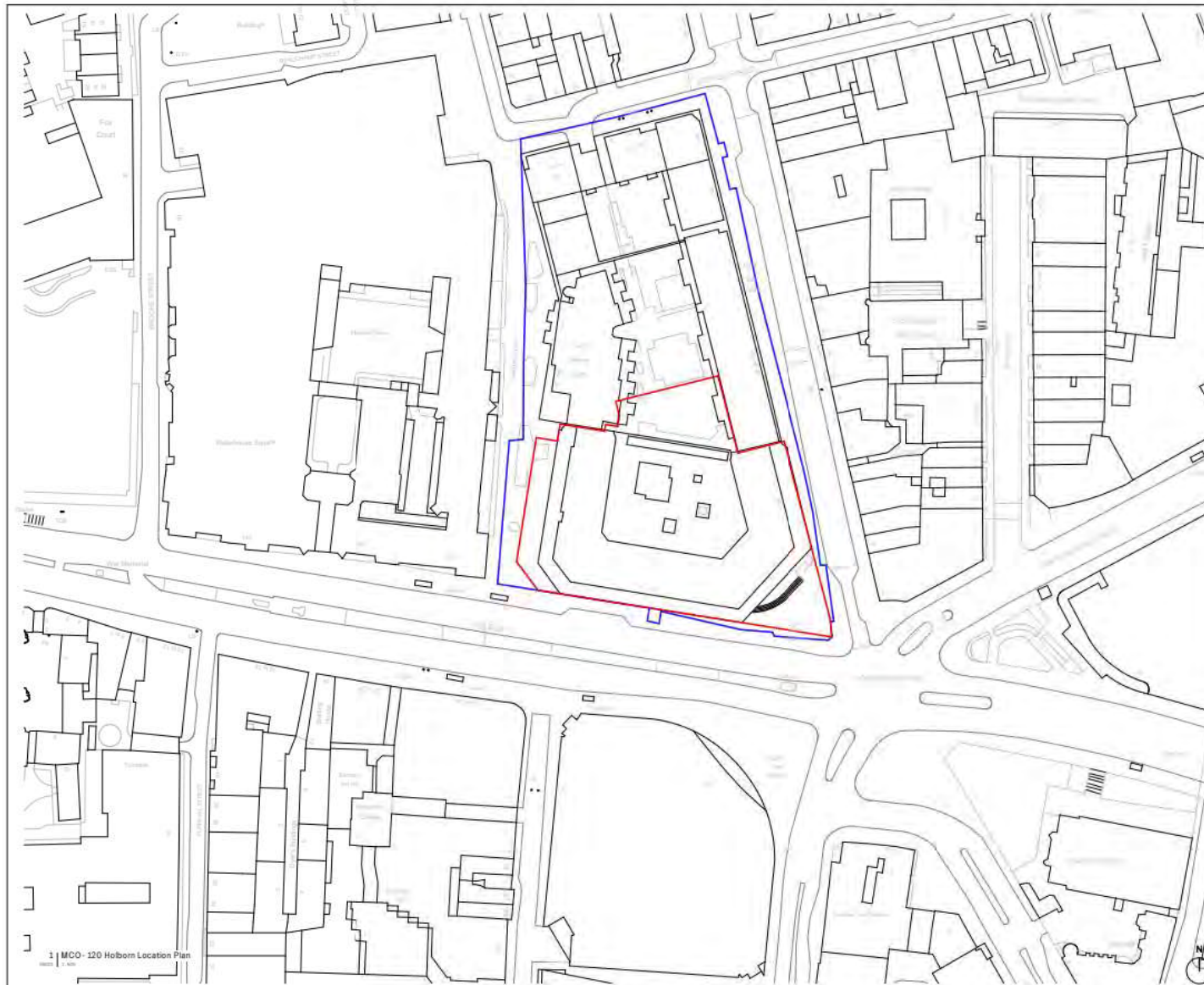
+ The effect of section 73(2D) of the Town & Country Planning Act 1990

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

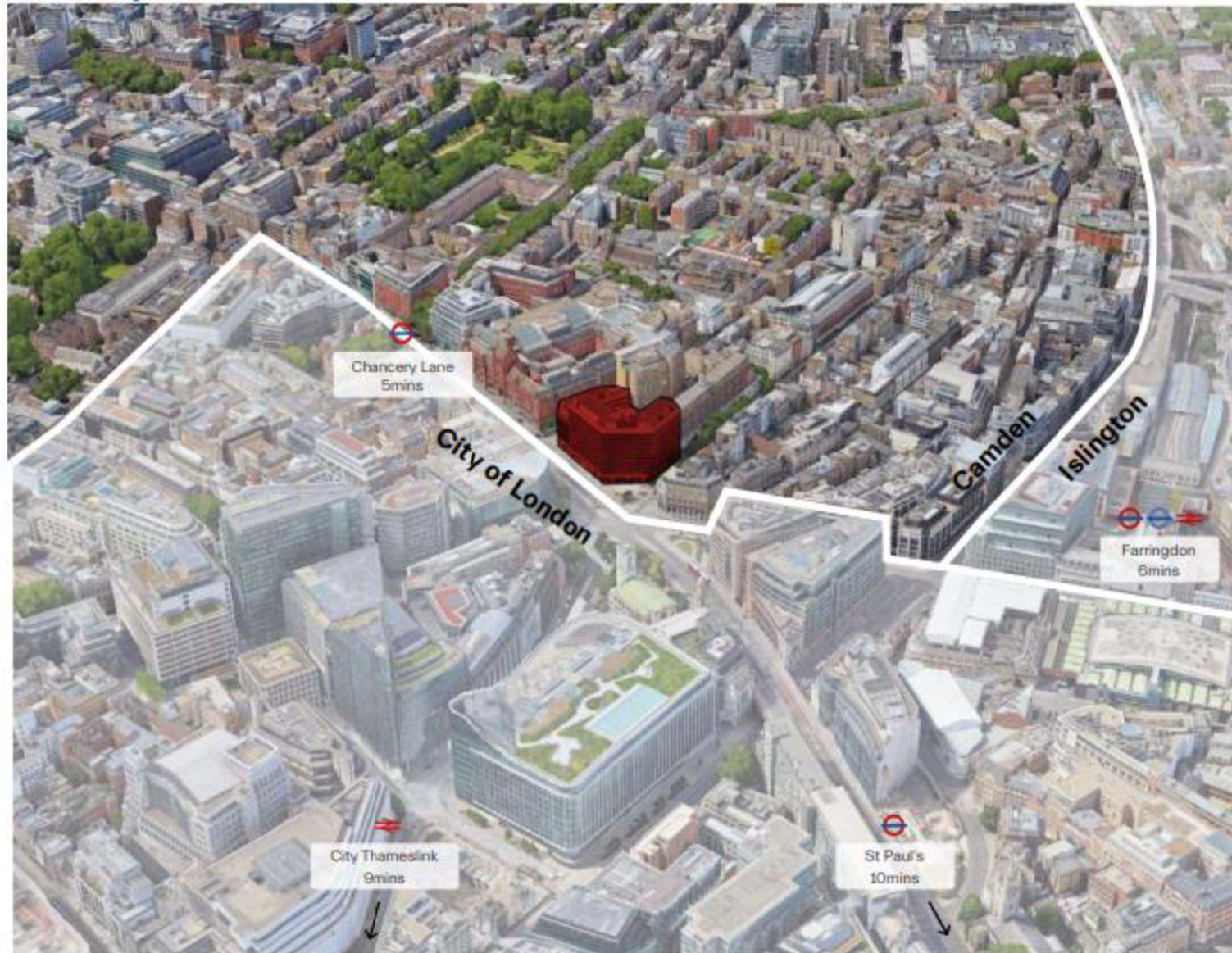
+ Phased development

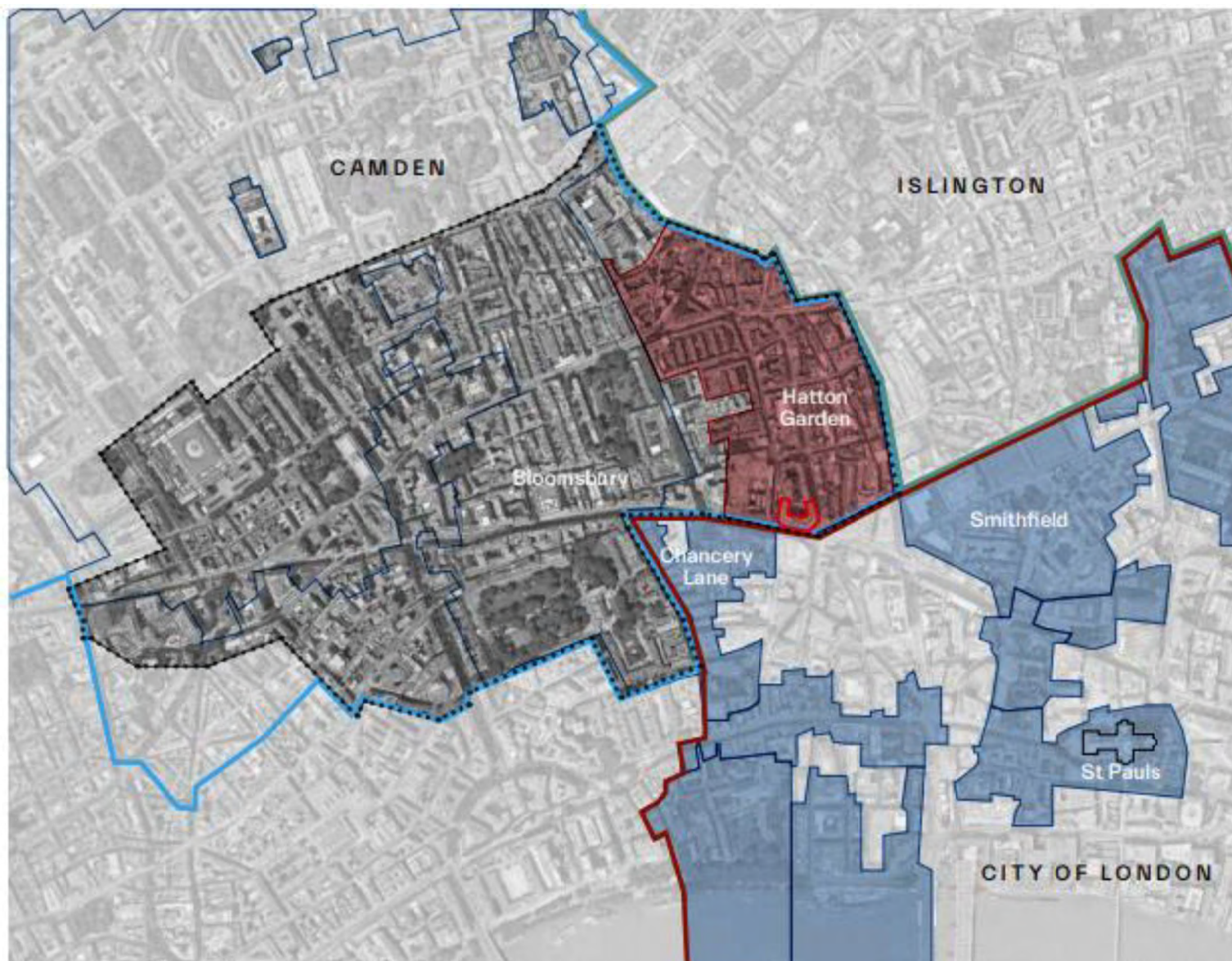
In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are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

7. You are advised that the alternative use permission hereby granted gives flexibility of use for 10 years from the date of this permission. After 10 years the lawful use will revert to whichever of the uses is taking place at the time



Aerial view looking north-west



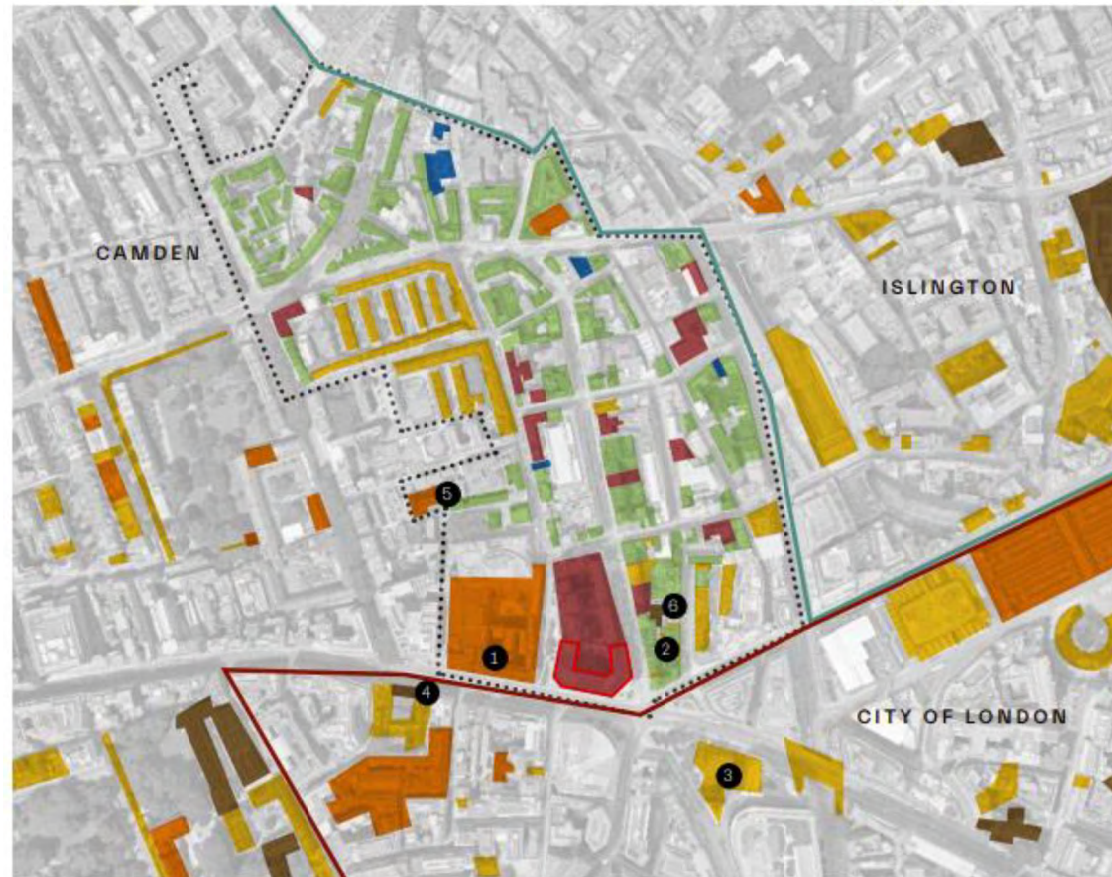


120 Holborn is within a conservation area and is surrounded by a series of significant heritage and listed buildings. Planning guidance refers to the building as 'negatively contributing' to the conservation area and its out-of-place character, and is not currently considered an asset in its own right. The intent of the proposal is to bring a slight enhancement to the Hatton Garden Conservation Area overall.

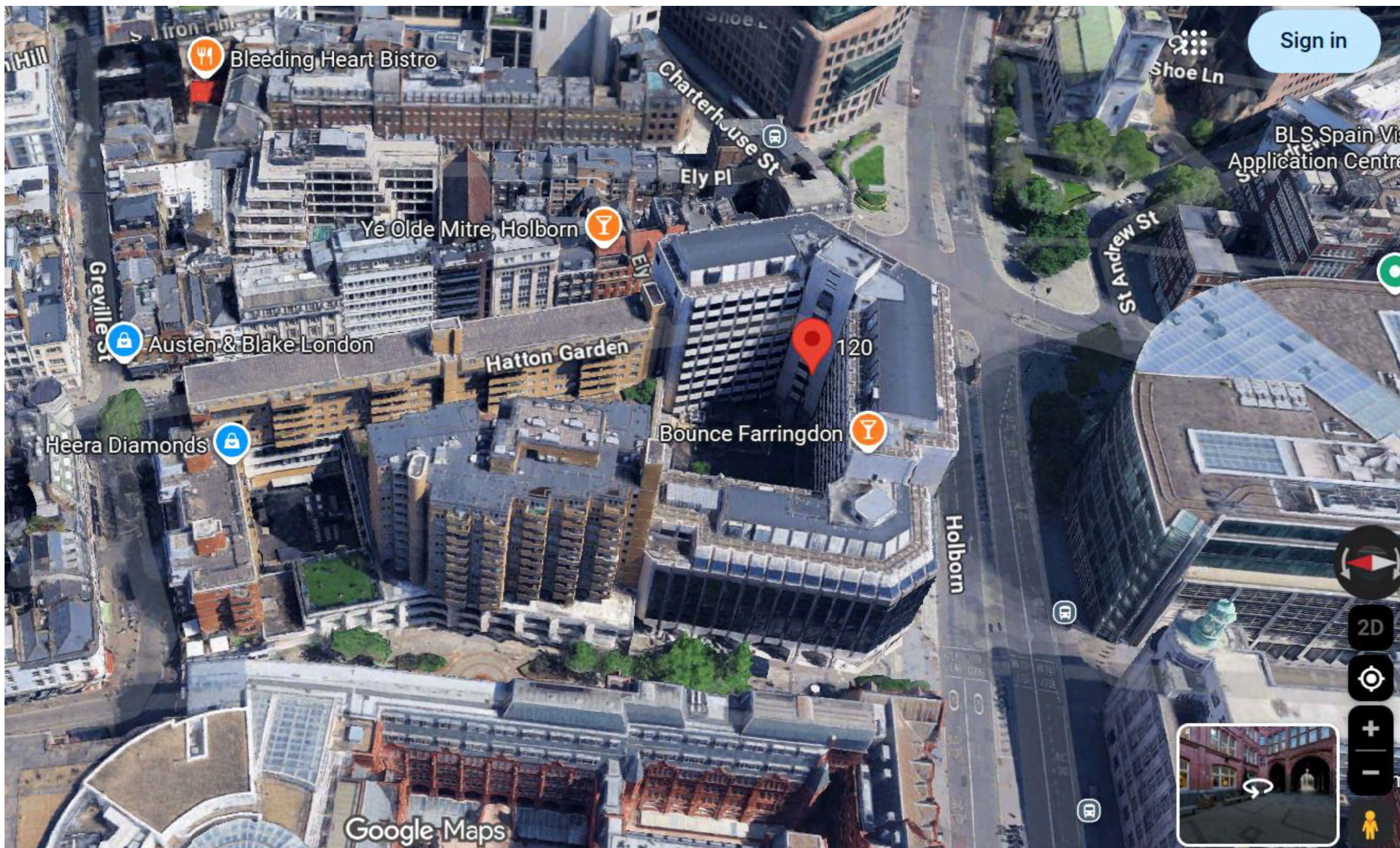
(#) as referred to in
Conservation Area report

Key

- Grade I listed
- Grade II* listed
- Grade II listed
- Positively contributing building (#)
- Negatively contributing building (#)
- Vacant plot
- Hatton Garden Conservation Area
- 120 Holborn



- | | |
|------------------------------|------------------------------|
| 1 Waterhouse Square | 4 338 High Holborn |
| 2 Ye Olde Mitre Public House | 5 St Alban the Martyr Church |
| 3 Church of St Andrew | 6 St. Etheldreda's RC Church |











118-128 Holborn showing an active street frontage



1.



2.



3.



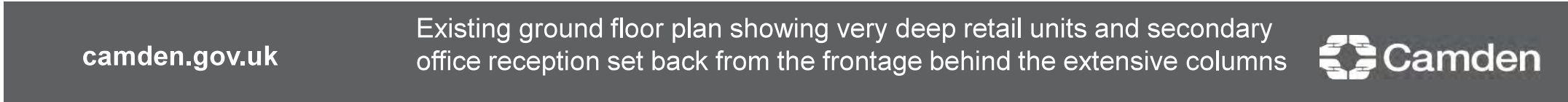
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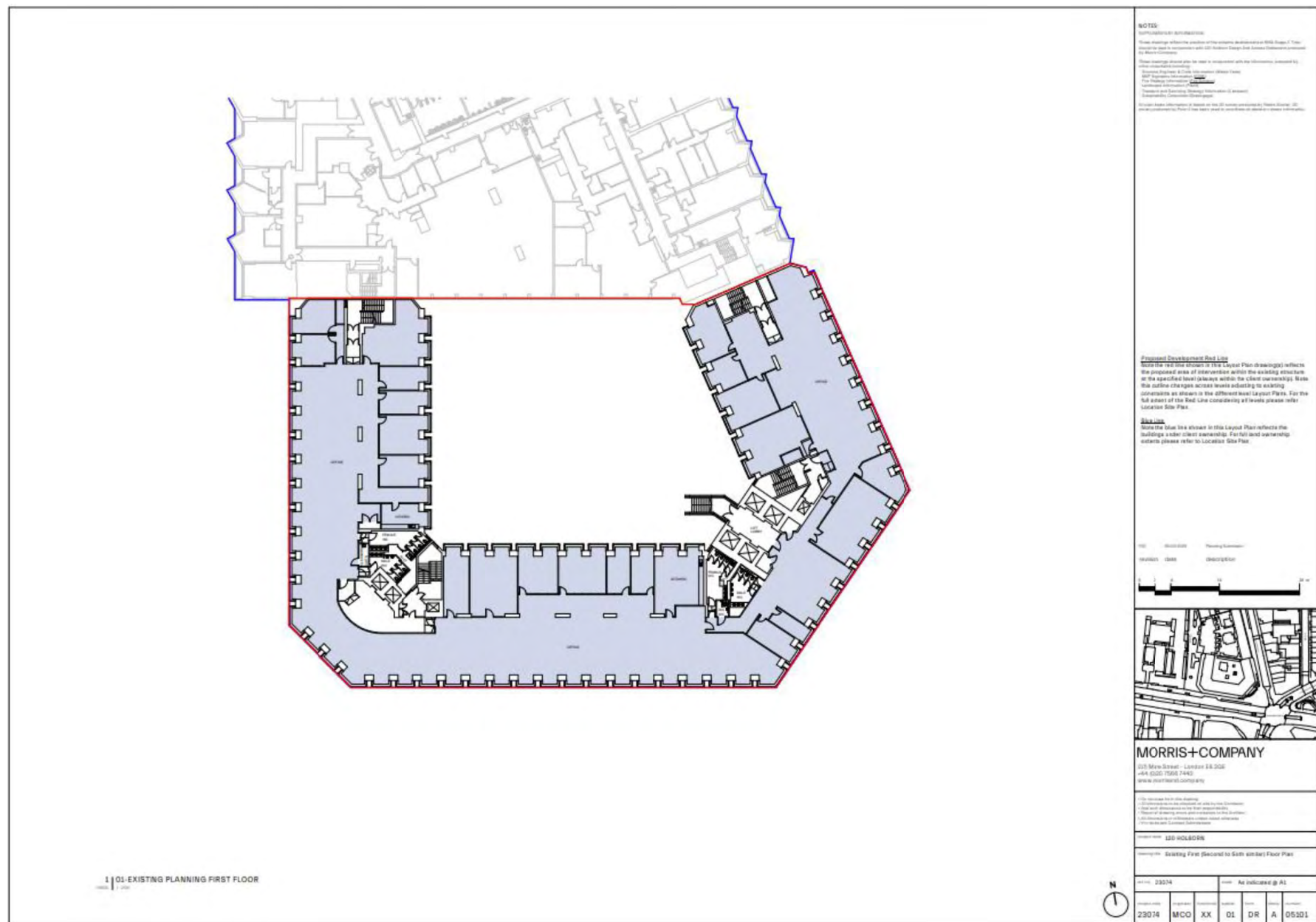


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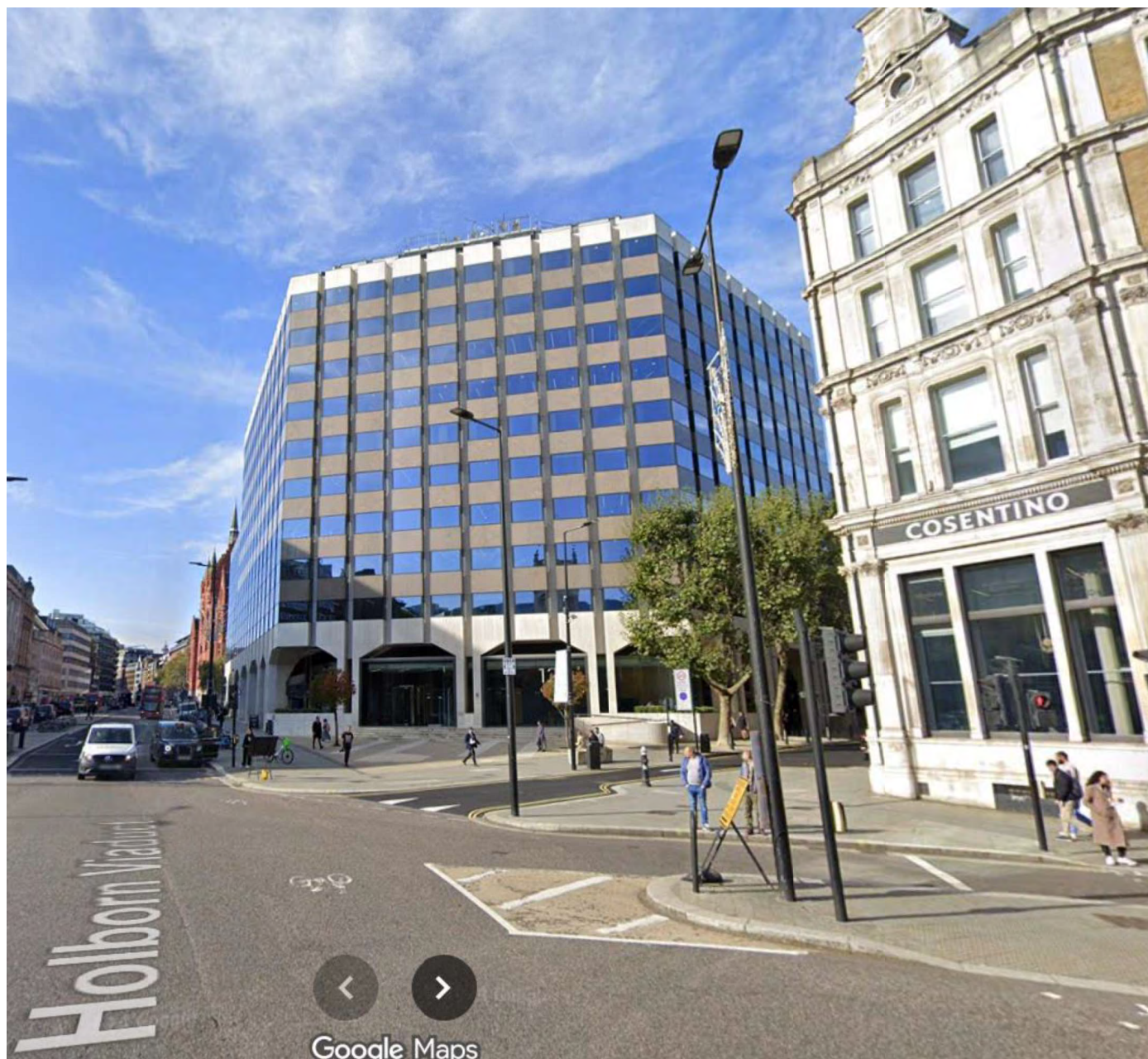


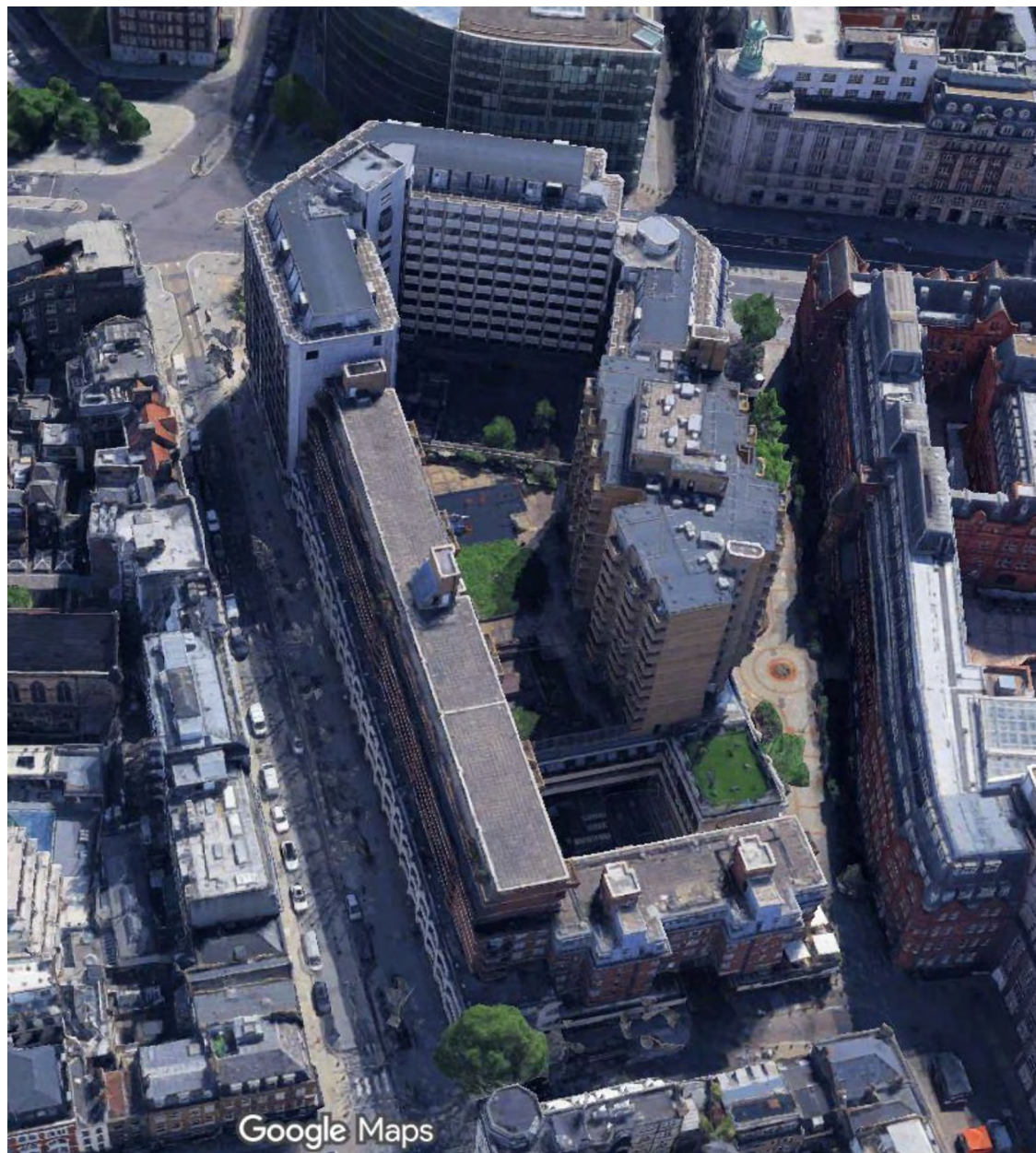
6.













Design and Access Statement
23074-MCO-XX-XX-DS-A-01101
25th of July 2025
Revision: P01

120 HOLBORN

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London E8 3QE
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camden.gov.uk

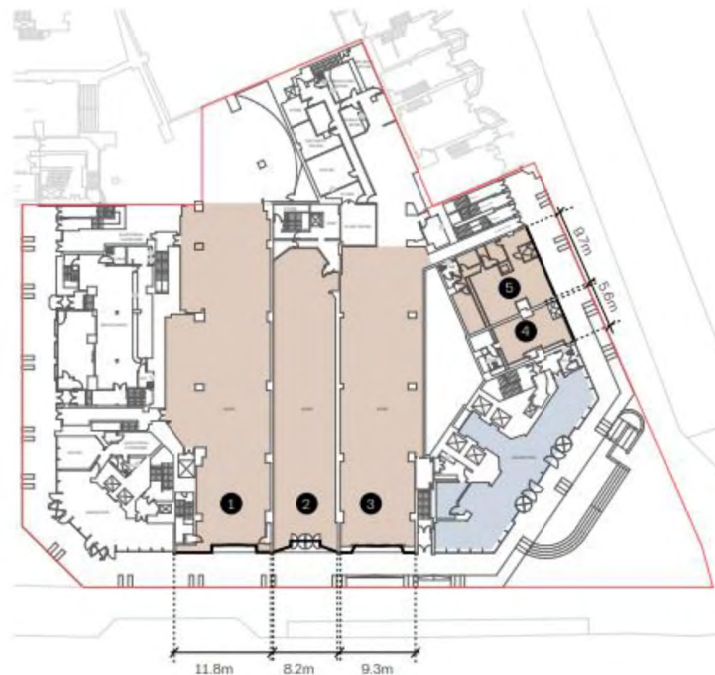
The proposals – removing existing granite cladding and glazing and replacing with chamfered metal cladding and removal of columns (to widen window bays)





16.0 Appendix 3: Retail Zones

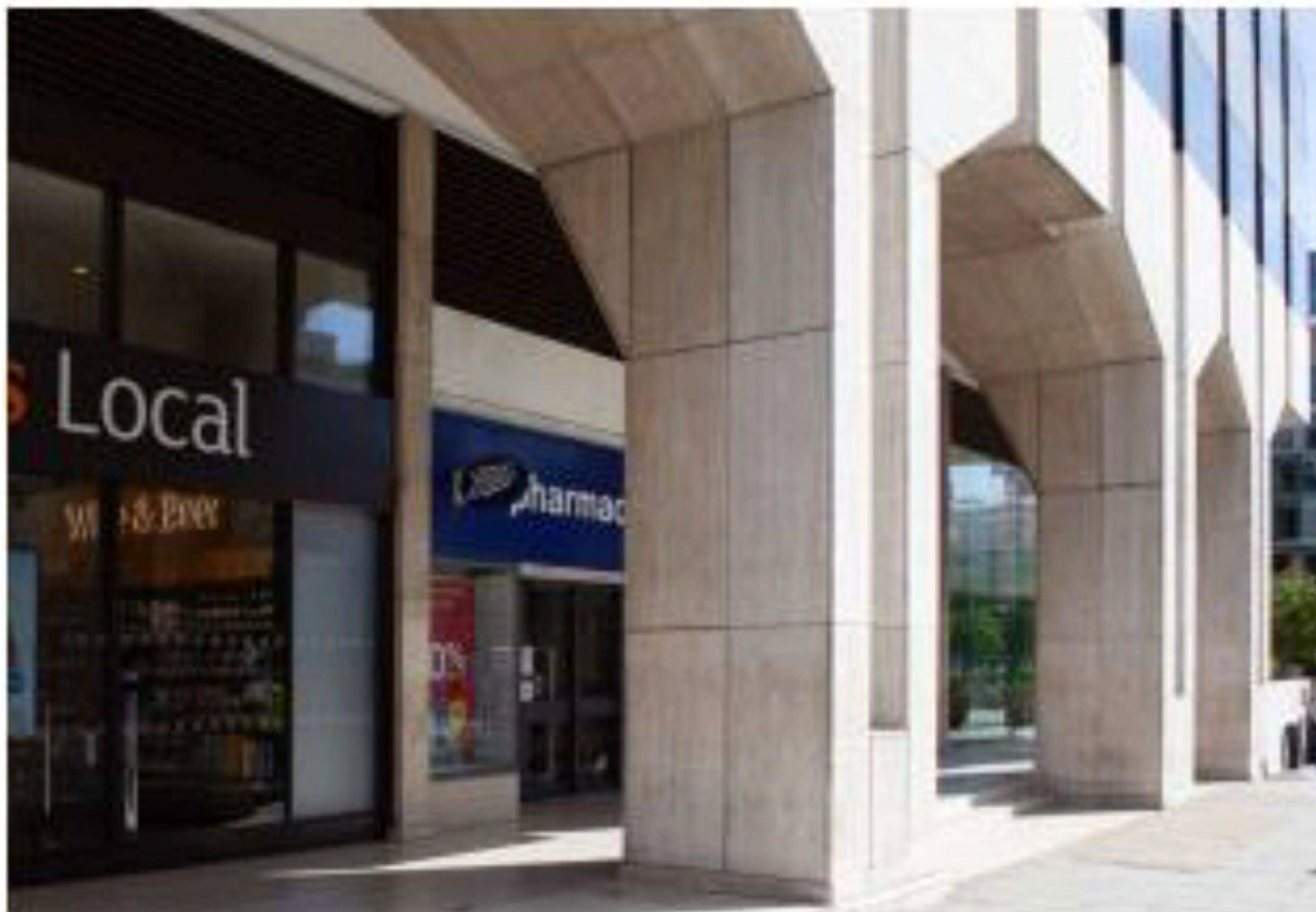
16.2 Retail Frontage



23074 120 Holborn - Design and Access Statement



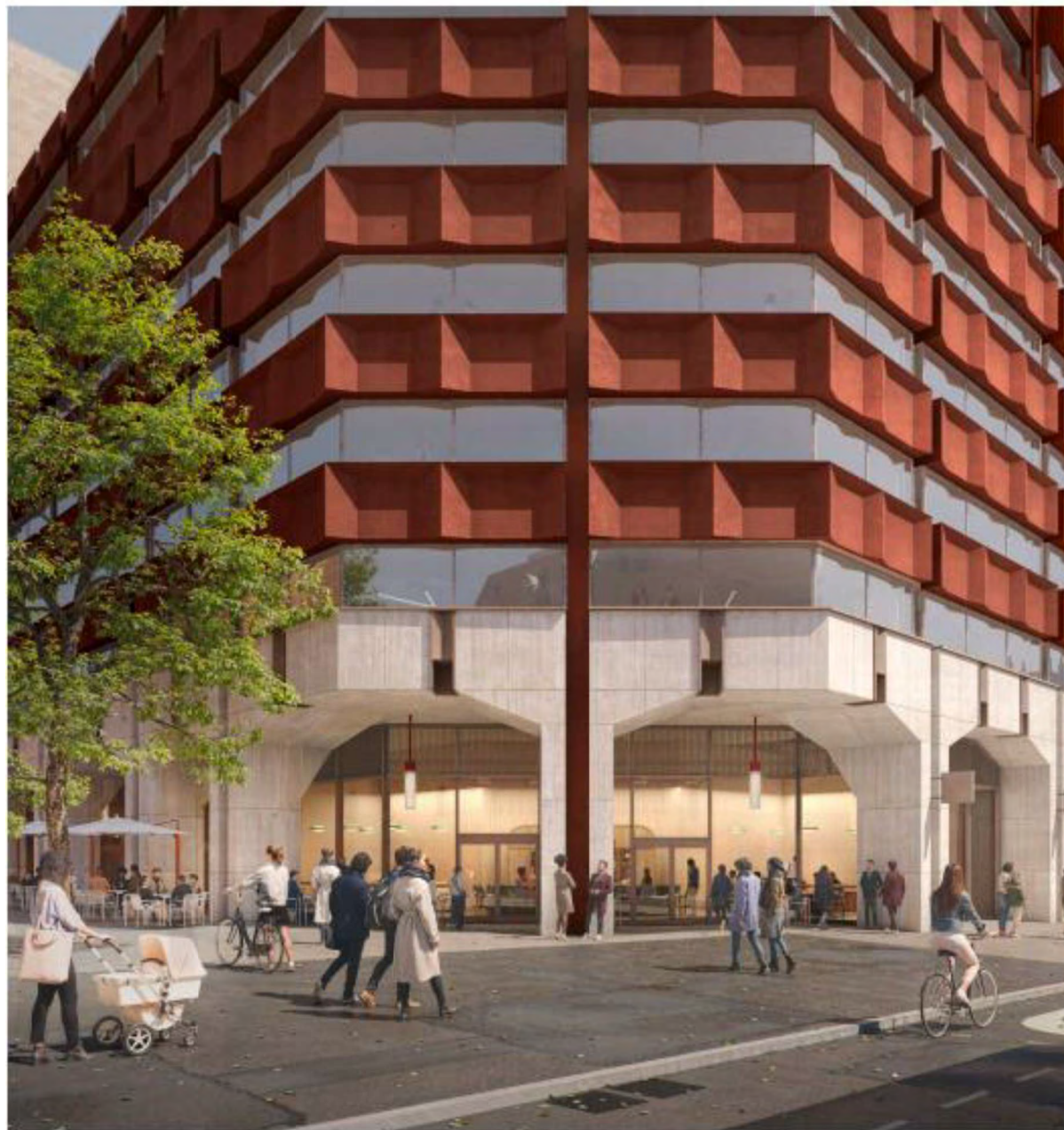
123 of 123





Existing Condition



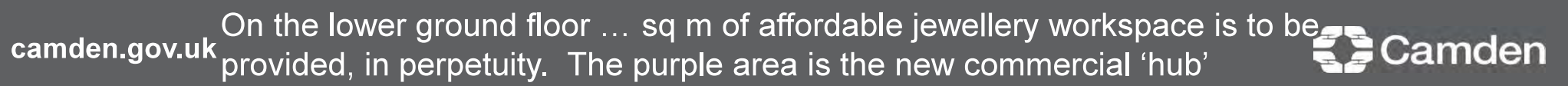


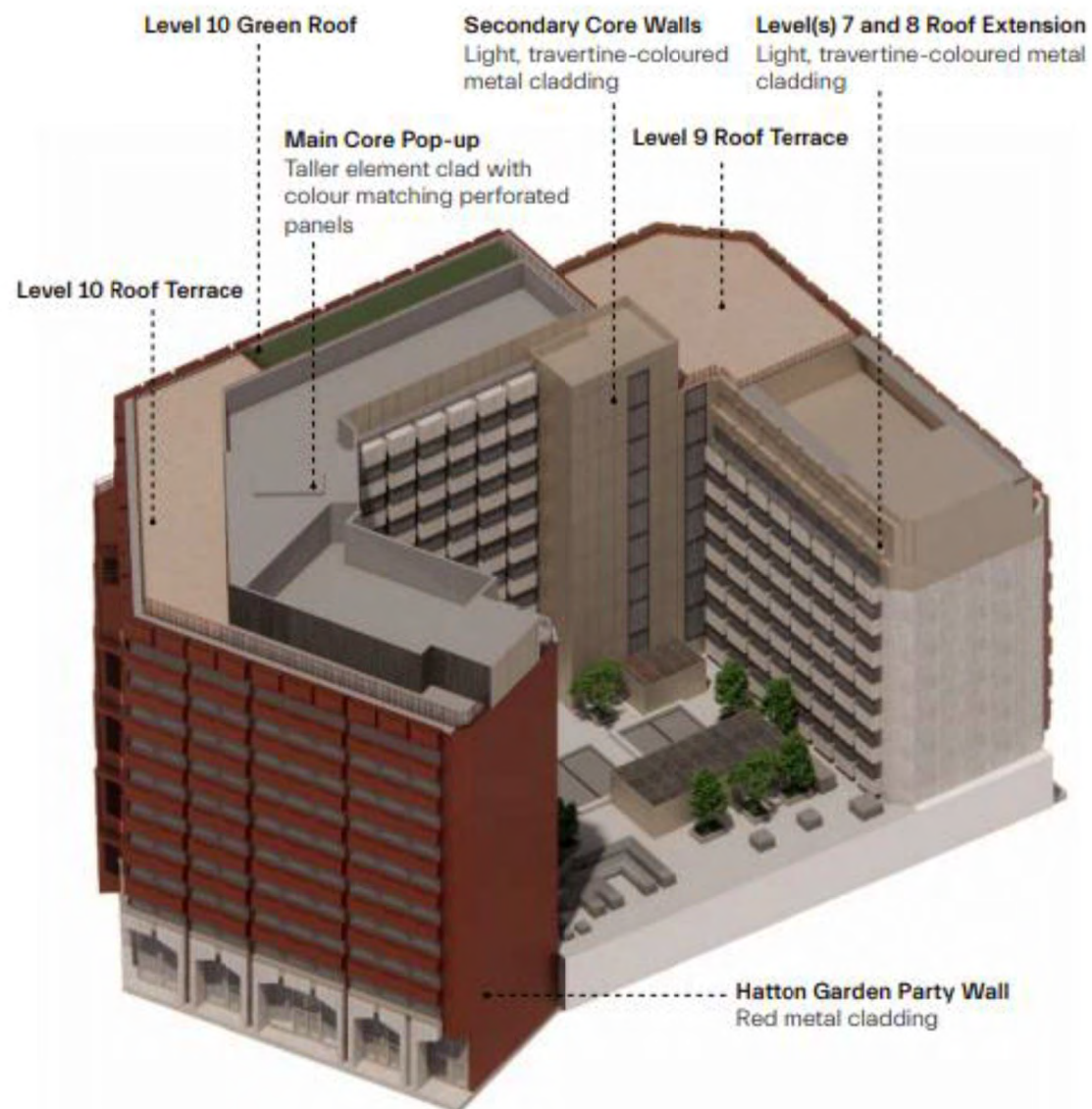


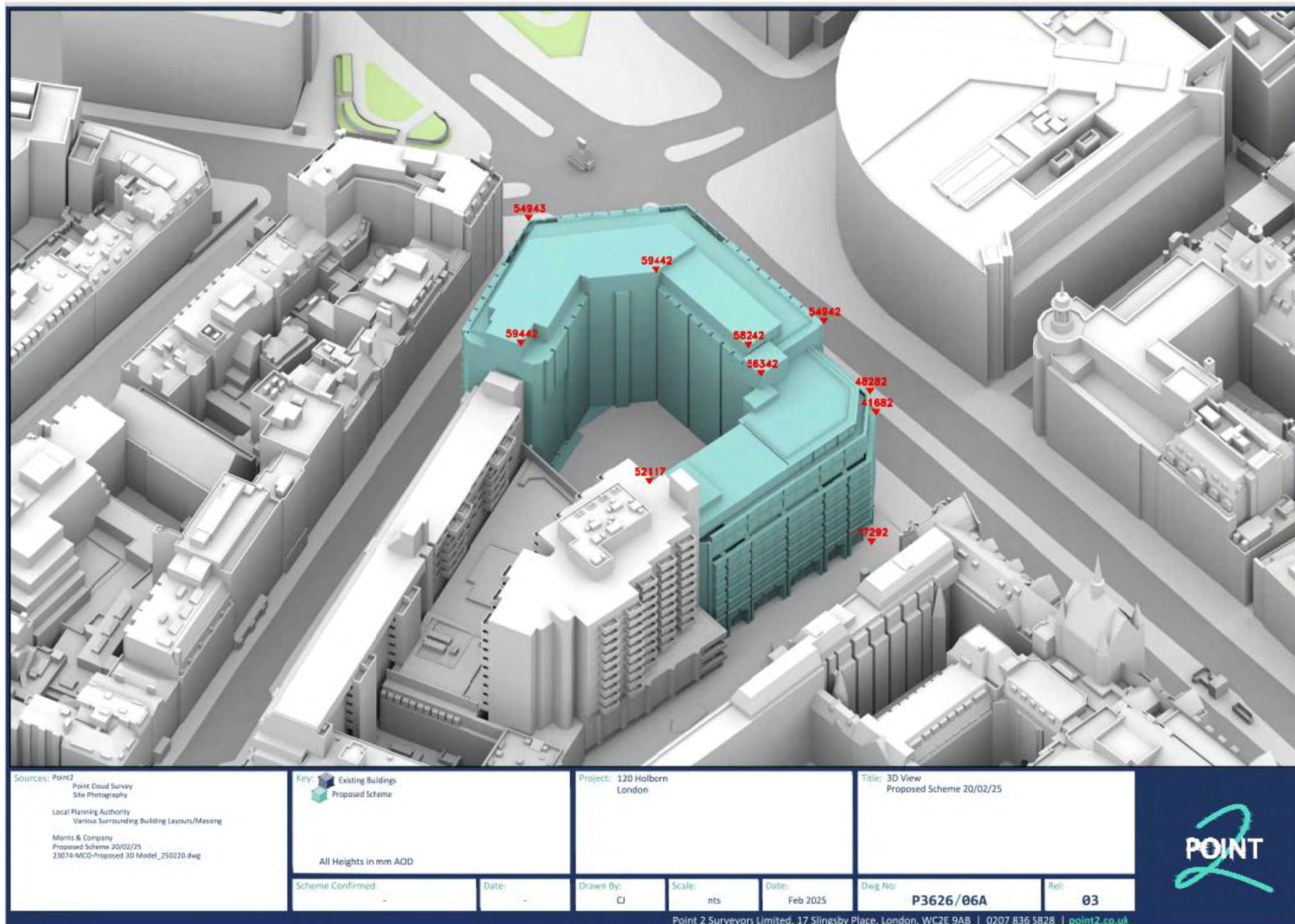
Hatton Garden Public Realm



Render view from Holborn







camden.gov.uk

Jeygrove Court and Vesage Court in the Gages Estate have been assessed for Daylight & Sunlight impacts and industry standard tests demonstrate that there would be no undue losses of daylight or sunlight to any habitable rooms or amenity spaces.



Proposed

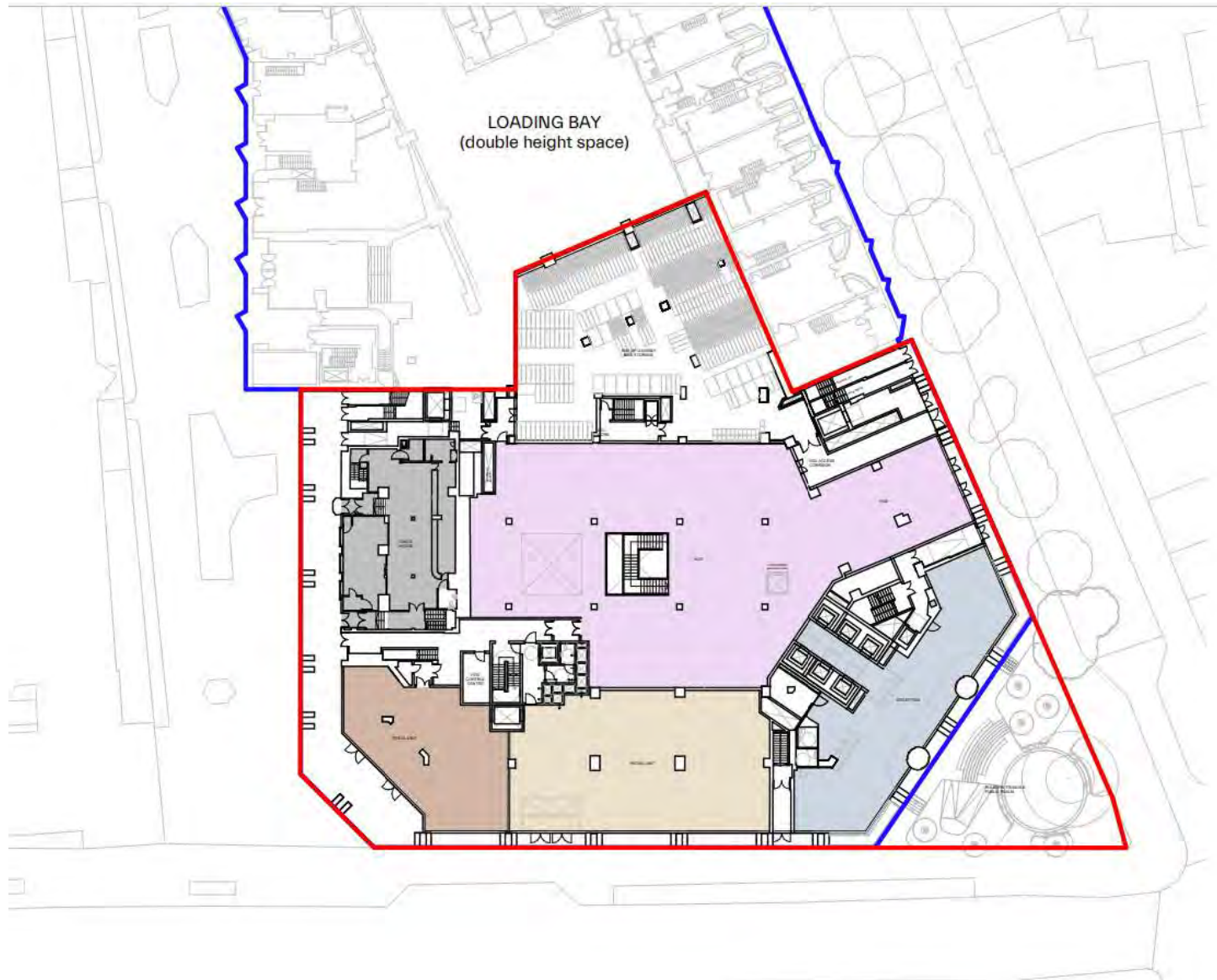


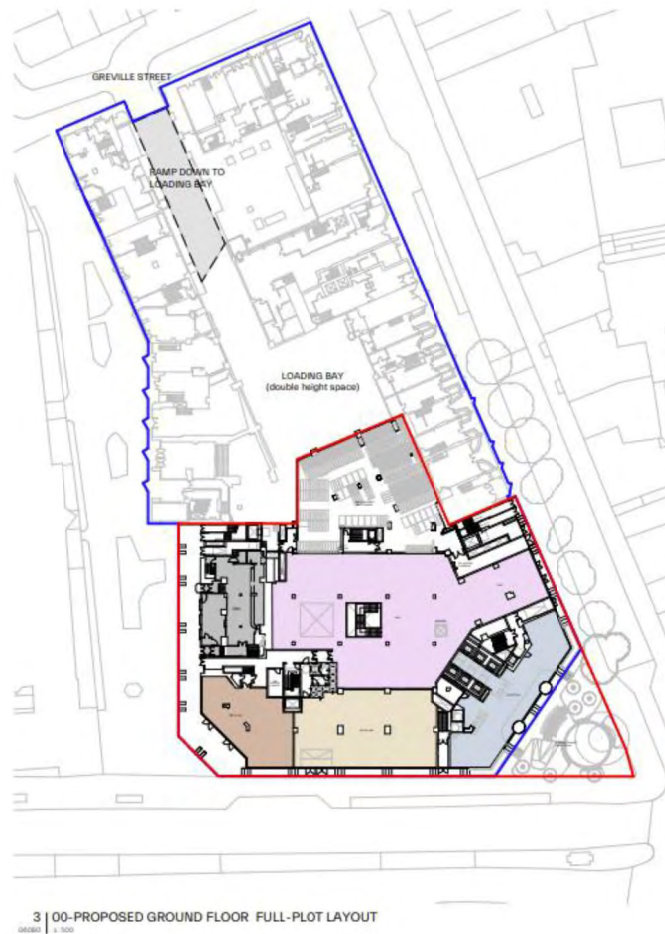
Design Development



Level 1 Courtyard_ (For full landscape proposal please refer to layouts (produced by Planit))





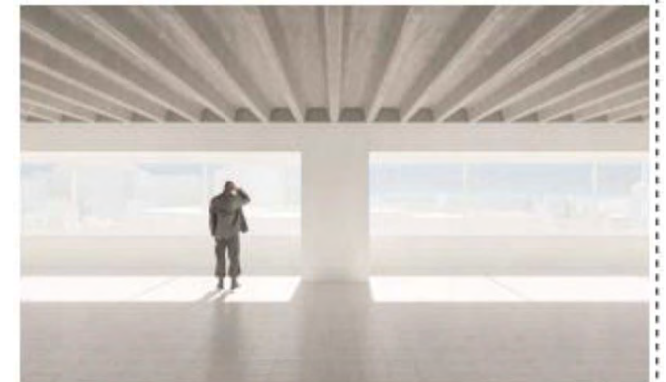




A extensive study of options was thoroughly explored and assessed by stone and facade specialist, considering all potentially feasible fixing approaches.

A detailed structural analysis was conducted, demonstrating that the stone panels are likely to **exceed their stress capacity** during the construction phase and will operate at 100% of their capacity during normal service life. **This presents a significant concern.**

The inherent uncertainties and weaknesses of the stone ultimately render the stone retention approach **non-viable** from a **structural and safety standpoint**, therefore requiring replacement.



Combining window bays and adding insulation opens up views from the office floors, improves daylighting, and reduces the amount (and cost) of insulation required to sufficiently upgrade the building's environmental performance.

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