

Addresses:	Kingsway House 103 Kingsway London WC2B 6QX	4 Great Queen Street & 62 Parker Street London WC2B 5DJ	2
Application Number(s):	2025/5575/P	Officer: Josh Lawlor	
Ward:	Holborn and Covent Garden		
Date Received:	09/12/2025		
Proposal:	Demolition of 4 Great Queen Street and 62 Parker Street and erection of a new 7 storey building in connection with the change of use of Kingsway House from commercial use (Class E) to provide a combined hotel use (Class C1), extension and remodelling of upper storeys of Kingsway House to accommodate further Class C1 hotel floorspace, provision of ancillary facilities, Class E commercial unit at ground floor level of Kingsway House, and associated works including refurbishment of Kingsway House façade.		
Background Papers, Supporting Documents and Drawing Numbers: Application drawings and supporting documents: Existing Drawings: A025-001; A025-099; A025-100; A025-101; A025-102; A025-103; A025-104; A025-105; A025-106; A025-107; A025-108; A025-150; A025-151; A025-152; A025-200; A025-201; A025-202; A025-203. Demolition Drawings: A050-099; A050-100; A050-101; A050-102; A050-103; A050-104; A050-105; A050-106; A050-107; A050-108. Proposed Drawings: A100-001; A100-099; A100-100; A100-101; A100-102; A100-103; A100-104; A100-105; A100-106; A100-107; A100-108; A100-150; A100-151; A100-152; A100-153. Application Documents: Application Document Schedule; Application Drawing Register; Covering Letter; CIL Form; Site Location Plan (Scale 1:1250); Existing Site Plan; Proposed Site Plan; Application Drawings; Design & Access Statement; Heritage Statement; Structural Report; Archaeological Assessment; Planning Statement; Marketing and Loss of Employment Report – Kingsway House; Leisure Use Assessment – 4 Great Queen Street; Outline Construction Logistics Plan; Daylight and Sunlight Assessment; Preliminary Ecology Appraisal; Energy Statement; Whole Life Carbon Assessment; Circular Economy Statement (including Pre-Demolition Audit); Sustainability Statement (including BREEAM); Overheating Assessment; Acoustic Report; Air Quality Assessment; Transport Assessment; Travel Plan; Delivery and Servicing Management Plan; Sustainable Drainage Systems Strategy; Fire Statement.			

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

GSM Estates Ltd

Agent:Gabriella Bexson
Montagu Evans
70 St Mary Axe
London
EC3A 8BE

ANALYSIS INFORMATION

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Class E	Commercial, business and service	3,272 (Kingsway House)	182	- 3,090
Sui Generis	Entertainment venue	912 (4 Great Queen Street and 62 Parker Street)	0	- 912
Class C1	Apart-Hotel (including plant area)	0	+ 4,598	+ 4,598
TOTAL		4,184	4,780	+596

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	0	0	0
Car - Disabled accessible	0	1 (secured through a financial contribution)	1
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – long stay	0	+ 4	+ 4
Cycle – short stay	0	+ 19 (9 long stay provided on site and 11 secured through an off-site contribution)	+ 19

EXECUTIVE SUMMARY

- i) The proposals seek a refurbishment, extension and change of use of Kingsway House and redevelopment of 4 Great Queen Street and 62 Parker Street to provide an aparthotel use (Class C1). This would deliver 80 rooms (4,598 sqm of gross internal floorspace) in a highly accessible Central London location, supporting the enhancement and extension of London's attractions by providing visitor accommodation.
- ii) Ref: 2024/3493/P, approved in November 2025 (the 2025 permission), was for the change of use and extension of Kingsway House to an aparthotel. This Application now incorporates 4 Great Queen Street and 62 Parker Street into an expanded apart-hotel scheme. Since the resolution to grant at planning committee, the applicant (GMS Estates) has had the neighbouring building, 4 Great Queen Street, come back into their control. Previously, 4 Great Queen Street had been on a long lease to an adult entertainment venue and has never been under the applicant's direct control. 4 Great Queen Street is in a poor, bordering dangerous condition. Structural stability works have been undertaken by the applicant at roof level to keep the public safe and to ensure the building is watertight, however this is a temporary measure.
- iii) The buildings are in poor structural condition due to historic fire damage, prolonged water ingress and extensive alterations. The differing floor levels prevent effective integration with Kingsway House. Officers are satisfied that, alongside the retention and refurbishment of Kingsway House, demolition represents the most practical redevelopment option. A planning condition requires at least 95% of demolition and excavation waste to be diverted from landfill and secures the implementation of the Circular Economy Statement, including a target for at least 20% recycled and reused material content in the new development.
- iv) The existing building at 4 Great Queen Street and 62 Parker Street has a lawful Sui Generis use as a nighttime entertainment venue, most recently operating as the Red Rooms strip club until its closure during the COVID-19 pandemic in 2020. In accordance with Local Plan Policy C3. The site's constrained layout, narrow plot and fringe location means that retaining the premises for leisure or entertainment use is not feasible, noting that alternative nighttime venues could also result in unacceptable impacts on residential amenity. The Sui Generis use would also need planning permission for an alternative nighttime/entertainment/cultural use. The former strip club use is not afforded the same policy protection as other cultural facilities.
- v) Kingsway House was vacated entirely in December 2022. The 2025 permission was supported by marketing evidence from March 2023; the applicant has marketed the building throughout their ownership since 2016, and the 2021 applications for office refurbishment and extension schemes. The marketing evidence and periods of vacancy demonstrate a lack of market demand for the office space. The existing office space because of its quality and low market demand over a sustained period is not considered to be suitable for continued business use. It is therefore considered that the loss of employment use does not conflict with policy E2 of the Local Plan, subject to a contribution to creating or

promoting opportunities for employment or training of local people in accordance with the CPG (Employment Sites and Business Premises).

- vi) The London Plan and Local Plan support the delivery of visitor infrastructure within the Central Activities Zone, which is near many tourist destinations and attractions. The proposed aparthotel will bring a vacant building back into use. The proposal will enhance and optimise the building's environmental performance by retaining and upgrading the building fabric and services strategy. While housing is the priority land use and there is a policy preference, the council must assess this application against policy and cannot insist on housing being provided. The mixed use policy is, however, triggered by the net increase in space. It was considered that housing could not be provided as part of the uplift as it would compromise the overall development. A financial contribution is however secured towards the council's affordable housing fund.
- vii) The site is located within the Kingsway Conservation Area but is not a listed building. Within the Kingsway Conservation Area Statement, Kingsway House is identified as a building which makes a positive contribution to the character and appearance of the Conservation Area. The new building on Great Queen Street, whilst taller, has been designed in a way which allows it to respond sensitively to its context. The building rises sheer above the existing by a storey with a further two set-back mansard-style floors; it is more dominant because of that, but it aligns nicely with the detailing of the Kingsway Building. The setback floors are designed to feel recessive, allowing for a transitional building between the two streets. This approach allows for the efficient use of land.
- viii) The proposed development has been assessed in terms of its impact on neighbouring amenity, including daylight and sunlight, privacy, outlook, noise, disturbance and air quality. Subject to the recommended planning conditions, and S106 Obligations, officers are satisfied that the development would not result in unacceptable impacts on the amenity of adjoining occupiers. Conditions are recommended to secure appropriate noise mitigation, plant and machinery details, waste and servicing arrangements, and controls over air quality, ensuring the development provides an acceptable standard of amenity for existing and future occupants.
- ix) The development incorporates cycle parking, servicing arrangements and a Travel Plan, with planning conditions and Section 106 obligations securing the necessary planning obligations towards sustainable transport initiatives which help mitigate the impacts of increased trips to and from the site. Officers are therefore satisfied that the proposal would not give rise to unacceptable transport or highway impacts
- x) Subject to the recommended conditions and S106 obligations, the development would not harm neighbouring amenities, the local transport network, or infrastructure.

OFFICER REPORT

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

1. SITE AND BACKGROUND

Location

- 1.1 Kingsway House comprises a building of ground plus 6 storeys (plus basement level). The building has a lawful Class E use (Commercial) with the basement and ground floor most recently accommodating retail floorspace and the upper floors being utilized for office use. The building was completely vacated in December 2022. Kingsway House fronts onto Kingsway and faces east. Great Queen Street flanks the building to the south and Parker Street to the north. 4 Great Queen Street and 62 Parker Street are connected as part of the same building and is referred to as 4 Great Queen Street herein.



Figure 1 Site location plan (red application site: Kingsway House with 4 Great Queen Street and 62 Parker Street, the latter demarcated with a grey line; blue shows the applicant's ownership).

- 1.2 The existing building is a 4-storey frontage with a setback mansard 5th floor. It extends to the rear to incorporate 62 Parker Street. It holds a lawful Sui Generis use, having most recently operated as a bar and adult entertainment venue (strip club). Historically, the building was home to the iconic Blitz Club during the late 1970s and early 1980s. Since returning to the applicants'

control, the property has undergone a series of remedial works to temporarily stabilise the structure.

- 1.3 The site is within the Central London Area and London's Central Activity Zone (CAZ). The building's frontages on Great Queen Street, Kingsway and Parker Street are designated as Central London Frontage.
- 1.4 The site is within the Kingsway Conservation Area. Kingsway House was designed by A Sykes and built circa 1905; it is not listed but is identified as making a positive contribution to the character and appearance of the Kingsway Conservation Area. 4 Great Queen Street is not listed and is not identified within the Kingsway Conservation Area Appraisal as making a positive contribution to the Conservation Area. The Grade II listed 5 Great Queen Street and Grade II listed 60 Parker Street are immediately adjacent to the site and share a party wall with 4 Great Queen Street and 62 Parker Street.
- 1.5 The site has a Public Transport Accessibility Level ("PTAL") of 6b, the highest rating achievable. It is a short walk from Holborn Underground Station.
- 1.6 The surrounding area includes many uses, primarily offices, retail, hotel, and some residential.
- 1.7 The site has a low probability of flooding (Flood Zone 1).

2. THE PROPOSAL

- 2.1 The proposal is the demolition of 4 Great Queen Street and 62 Parker Street and erection of a new 7 storey building in connection with the change of use of Kingsway House from commercial use (Class E) to provide together a hotel (Class C1), extension and remodelling of upper storeys of Kingsway House to accommodate further Class C1 hotel floorspace, provision of ancillary facilities, Class E commercial unit at ground floor level of Kingsway House, and associated works including refurbishment of Kingsway House façade. The proposed development would comprise the following works:
 - Demolition and redevelopment of 4 Great Queen Street to provide an additional 596 sqm GIA. The proposed building is a 5 storey frontage with a 2 storey set-back mansard.
 - Change of use of 3,272 sqm GIA floorspace from office to hotel at Kingsway House;
 - Remodelling and extension of Kingsway House to provide an additional 148 sqm of GIA Floorspace;
 - Provision of 80 apart hotel rooms;
 - A combined net increase of 778 sqm GIA floorspace;

- The hotel entrance is via the Kingsway / Parker Street corner with active street frontage along Kingsway, Parker Street, and Great Queen Street. The proposed ground floor is shared between the aparthotel lobby area, which includes a publicly accessible café. There is a publicly accessible bar/restaurant on the ground floor at the corner of Kingsway/Great Queen Street.
- 2.2 The combination of the sites allows for additional aparthotel rooms (beyond what was approved in 2025), a more expansive commercial and F&B offering, and a rationalising of ancillary and supporting functions.
- 2.3 No revisions to the design of the scheme were made during the application. There was extensive pre-application engagement on the scheme covering design, heritage, and sustainability.

3. RELEVANT HISTORY

99-103 Kingsway

- 3.1 **2024/3493/P** Change of use of existing building from commercial use (Class E) to apart hotel use (Class C1), extension and remodelling of upper storeys to accommodate further Class C1 apart hotel floorspace, including new 8th floor, provision of ancillary facilities and retention of Class E commercial unit at ground floor level and associated works including refurbishment of façade **Granted 23/11/2025**
- 3.2 **2016/3432/P** - Demolition of 6th and 7th floors and lift overrun and replacement with double mansard roof and set back 8th floor, with roof terrace above; internal reconfiguration to provide additional office (Class B1a) and retail floor space (Class A1/A3). **Granted 23/11/2017 and implemented to keep the planning permission live**



Figure 2 Consented scheme in 2017

- 3.3 **2021/1368/P** - Certificate of lawfulness for 'Commencement of works in accordance with condition 1 (within three years from date of permission) of planning permission 2016/3432/P granted on 23/11/2017 and extended until 01/05/2021 under Section 93B of the TCPA 1990 (as amended by Section 17 of the Business and Planning Act 2020) and amended under application ref 2020/4797/P dated 11/11/2020, for (for demolition of 6th and 7th floors and lift overrun and replacement with double mansard roof and set back 8th floor, with roof terrace above; internal reconfiguration to provide additional office (Class B1a) and retail floor space (Class A1/A3))'. **Granted 16/04/2021.**

4. CONSULTATION

Statutory consultees

- 4.1 Lead Local Flood Risk Authority consulted and no objection subject to conditions for further details the SUDS/blue roof.
- 4.2 TfL Infrastructure Protection Engineering responded with a request for a condition (No. 5) for further details of the development concerning the London Underground Piccadilly line tunnel.

Local groups

Covent Garden Community Association (CGCA)

- 4.3 The CGCA is the amenity society for the Covent Garden area.
- 4.4 We note the consents obtained in 2024 and the pre-application meeting that have taken place subsequently as set out in the design and access statement. Given this, we only wish to note, and seek to influence an amendment to, the proposed height of the new 4 Great Queen Street / 62 Parker Street. We note the proposed reduction in height during the pre-application advise process to six stories (is actually five storeys plus set back two storeys) but think that this stepping down (relative to Kingsway House) is insufficient to achieve the objective set out in the first pre-application meeting to *"incorporate a clear and sensitive transition in scale helping to mediate between the varying heights and forms of the surrounding context"*.
- 4.5 We would therefore suggest the reduction of 4 Great Queen Street / 62 Parker Street by a further floor, introducing a more staggered 'stepping down' to the heights of the adjoining properties. (This consideration is of greater concern regarding 4 Great Queen Street. 62 Parker Street is part of a less easily observed elevation).

Officer response: See section 8, "Design and Heritage," of the Report for a full analysis of the scale and relationship to surrounding buildings. The Council's Conservation Officer has been involved in pre-application discussions and has shaped the design and massing of the proposals and did not call for a further

reduction in the height of the development on Great Queen Street. They still identify a low level of less than substantial harm, which is explained below.

The proposed replacement building would increase the height and massing of development on both Great Queen Street and Parker Street by introducing a five-storey building with a two-storey set-back mansard roof. The design responds to the differing character of each frontage through its form and materials.

There are larger Edwardian buildings on Kingsway and the lower-scale earlier terraces to the west. On Great Queen Street, the replacement building has been designed to reflect the appearance of a traditional townhouse and to respect the established plot width and terrace rhythm. The set-back mansard ensures that, in longer views from Kingsway, Kingsway House remains the dominant building. The increased height would be apparent in views east along Great Queen Street.

On Parker Street, longer-distance views are naturally constrained by the narrow street, its curvature and surrounding built form, limiting views of the proposal.

The proposal introduces greater height and mass into Great Queen Street and Parker Street than has historically existed and reduces the abrupt transition in scale between Kingsway and the adjoining historic streets. This causes a low level of less than substantial harm.

The proposal uses appropriate materials, the recessed upper storeys, the reduced height of Kingsway House compared with the previously approved scheme, and the limited visibility of the upper floors all serve to mitigate these the effects noted above. The harm has been balanced against the public benefits of the scheme (see report assessment below paragraphs 8.65 and Section 19 'Conclusion and Planning Balance').

Kingsway Conservation Area Advisory Committee (CAAC)

- 4.6 The CAAC raises the following concerns set out below.
- 4.7 Scale and design: The proposed new building is considered too large and out of keeping with the character of Great Queen Street and Parker Street, particularly when viewed along these streets.
- 4.8 Relationship to surrounding buildings: The committee considers 4 Great Queen Street and 62 Parker Street to form part of a small terrace of domestic-scale historic buildings. While Kingsway House is much larger, it is appropriate because it fronts Kingsway, which has a more institutional character. The proposal is said to blur these distinct townscape characters.

- 4.9 Loss of the existing building: Although acknowledging its poor condition, the CAAC believes the existing building makes a positive contribution to the conservation area through its historic character. They argue demolition causes heritage harm and that there is no clear justification for why refurbishment and retention of the historic fabric is unviable, other than preventing a substantial upward extension.
- 4.10 Design quality: The replacement building is criticised for trying to combine the domestic character of the surrounding streets with the institutional scale of Kingsway House. The committee considers this unsuccessful, resulting in an awkward building that relates neither to Kingsway nor to the neighbouring terraces. Particular criticism is directed at the large brick flank wall, blind windows, and oversized mansard roof.
- 4.11 Precedent: Approving the scheme could establish an undesirable precedent for similarly tall developments on adjacent residential streets. They state that the officer's report should robustly justify why this site is exceptional.
- 4.12 Overall conclusion. The Kingsway CAAC objects to the application. While acknowledging that the proposal may nevertheless be approved due to its scale, it suggests that, if redevelopment proceeds at this scale, the new building should instead be designed as a more coherent extension of Kingsway House, using similar materials, detailing and architectural language, rather than attempting to emulate the scale and character of the neighbouring domestic building

Officer Response: See section 8, "Design and Heritage," of the Report for an analysis of the demolition, scale, relationship to surrounding buildings, design quality, precedent, and design evolution (i.e., exploring a design that more closely matches Kingsway House).

Adjoining occupiers

- 4.4 The development was advertised in the local press from 24/12/2025 to 17/01/2026.
- 4.5 4 site notices were displayed from 24/12/2025 to 17/01/2025 as follows:
- 1 site notice outside Kingsway House along Kingsway elevation
 - 1 site notice outside Kingsway House - Parker Street elevation
 - 1 outside Kingsway House - Great Queen Street elevation
 - 1 outside 4 Great Queen Street - Great Queen Street elevation
- 4.6 There were no comments or objections received from local residents.

5. POLICY

National and regional policy and guidance

[The draft NPPF \(2024\)](#)

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

[Draft National Planning Policy Framework](#)

[London Plan 2021 \(LP\)](#)

GG2 Making the best use of land

[GG3 Creating a healthy city](#)

[GG5 Growing a good economy](#)

[GG6 Increasing efficiency and resilience](#)

[SD6 Town centres and high streets](#)

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

[Documents](#)

[SD8 Town centre network](#)

[D1 London's form, character and capacity for growth](#)

[D3 Optimising site capacity through the design-led approach](#)

[D4 Delivering good design](#)

[D5 Inclusive design](#)

[D8 Public realm](#)

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

[D12 Fire safety](#)

[D13 Agent of Change](#)

[D14 Noise](#)

[E1 Offices](#)

[E10 Visitor infrastructure](#)

[E11 Skills and opportunities for all](#)

[HC1 Heritage conservation and growth](#)

[HC6 Supporting the night-time economy](#)

[SI 1 Improving air quality](#)

[SI 2 Minimising greenhouse gas emissions](#)

[SI 3 Energy infrastructure](#)

[SI 4 Managing heat risk](#)

[SI 5 Water infrastructure](#)

[SI 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](#)

[T6.4 Hotel and leisure uses parking](#)

[T6.5 Non-residential disabled persons parking](#)

[T7 Deliveries, servicing and construction](#)

[T9 Funding transport infrastructure through planning](#)

[DF1 Delivery of the Plan and Planning Obligations](#)

[M1 Monitoring](#)

[London Plan Guidance](#)

Local policy and guidance

Camden Local Plan (2017) (CLP)

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

[Policy H1 Maximising the supply of self-contained housing](#)

[Policy H2 Mixed use policy](#)

[Policy C1 Health and wellbeing](#)

[Policy C2 Community facilities](#)

[Policy C3 Cultural and leisure facilities](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E2 Employment premises and sites](#)

[Policy E3 Tourism](#)

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

[Policy A2 Open space](#)

[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[Policy D3 Shopfronts](#)

[Policy CC1 Climate change mitigation](#)

[Policy CC2 Adapting to climate change](#)

[Policy CC3 Water and flooding](#)

[Policy CC4 Air quality](#)

[Policy CC5 Waste](#)

[Policy TC2 Camden's centres and other shopping areas](#)

[Policy TC4 Town centre uses](#)

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

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

[Policy T3 Transport infrastructure](#)

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

[Policy DM1 Delivery and monitoring](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

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

[Air Quality - January 2021](#)

[Amenity - January 2021](#)

[Biodiversity CPG - March 2018](#)

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

Other guidance:

[Kingsway conservation area statement](#) (PDF)

Draft Camden Local Plan

5.1 Proposed Submission Draft Camden Local Plan (DCLP)

5.2 The [Proposed Submission Draft Camden Local Plan](#) was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The examination of the draft Local Plan is currently ongoing and hearings were held from 19 May 2026 to 11 June 2026.

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

5.4 The Proposed Submission Draft 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.

5.5 Draft London Plan 2026

5.6 The draft London Plan was published on 16th July 2026 for consultation. It's weight at this time ahead of any responses to consultation will be extremely limited. None of its draft policies are considered relevant to any of the applications being considered to the extent that they would affect the recommendations made by officers in the committee reports on the agenda.

6. ASSESSMENT

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

7	Land use
8	Design and Heritage
9	Impact on Neighbouring Amenity
10	Sustainability and Energy
11	Flooding
12	Air Quality
13	Transport
14	Refuse and Recycling
15	Fire Safety
16	Employment and Training Opportunities
17	Biodiversity Net Gain
18	Community Infrastructure Levy (CIL)
19	Conclusion
20	Recommendation
21	Legal Comments
22	Conditions
23	Informatives

7. LAND USE

Loss of Office Use

- 7.1 Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites in the borough and protect premises or sites suitable for continued business use. However, Policy E2 goes on to add that the Council will accept the loss of business premises where (A) the site is no longer suitable for its existing business use and (B) the possibility of retaining, reusing or redeveloping the site or building for a similar or alternative type and size of business use has been fully explored over an appropriate period.

- 7.2 The demand for Grade B office space has reduced due to the shift in occupier preferences towards best-in-class Grade A office space. Buildings with compromises such as poor building amenity, specifications, and configurations such as Kingsway House are struggling to find a market. As a result, the Grade B stock is experiencing void periods.
- 7.3 Whilst the Western side of Holborn (towards Covent Garden and Fitzrovia) has experienced some good leasing activity, historically, the small to medium-sized buildings along the Kingsway corridor have lacked best-in-class amenities and arrival experiences. Consequently, this has resulted in subdued leasing activity and low rental levels. Kingsway House was previously let at c.£41 per sq ft, and this area has traditionally been seen as a secondary location by the central London office market.
- 7.4 Midtown Submarket Analytics
- 7.5 There is demand for best-in-class. The applicant market analytics states that Q1 2024 was at its lowest level for 18 months and below the 10-year quarterly average in terms of take up of second hand Grade B Office space. Of the Q1 take-up, 65% was for new/refurbished office space, 26% was for second-hand Grade A stock, and 9% was for second-hand grade B stock. New leases, only a small proportion are businesses taking second-hand Class B space.

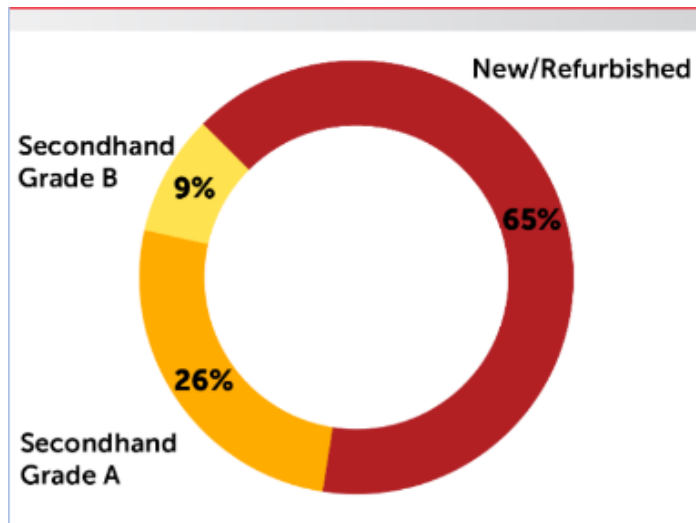


Figure 3 Percentage of grade by stock

- 7.6 EPC - The building currently has varying EPC ratings of E to D based on the different floors and individual office addresses in the building. The applicant states that EPCs are now expected to be at A or B. The minimum legal requirement is expected to be a C by 2027. Officers believe that the building could be upgraded to meet the required EPC rating; however, the current scores do indicate that refurbishment is required.

7.7 Below is a summary of the building's current specifications:

- Inefficient floorplate -The building floorplates are split into two equal-sized suites per storey, each approximately 1,000 sq ft.
- Small reception accessed directly from Kingsway.
- 2 x passenger lifts (undersized and non-DDA compliant)
- There is minimal WC provision - male and female WCs are in the communal parts on only the 2nd and 5th floors.
- No end-of-trip facilities (cycle storage or showers).
- No outside amenity.

7.8 The small, confined suites are no longer commensurate with today's market requirements. Occupiers generally seek more contemporary, collaborative office space; the period-style build does not offer the flexible workspace they seek.

7.9 The size of the individual suites is around 1,000 sqft within the total 3,272 sqm office floorspace. This limits the marketability of the building, as the market for occupiers seeking c.1,000 sq ft spaces is highly competitive, with many serviced and fully managed offices on the market. These competing products are often in refurbished buildings.

7.10 The London office market has continued to witness the divergence between best-in-class space and Grade B stock. According to Knight Frank's Central London office report, the total take-up for prime office space was 61% of last year's annual take-up, which sits above the long-term trend.

7.11 Marketing evidence

7.12 The 2025 Permission established the acceptability of the loss of this office floor space. Marketing evidence was provided with the Application, demonstrating that the building had been marketed for several years with diminishing interest. Following the 2025 Permission, no further marketing of the offices has occurred since that date. This is because the applicant intends to implement either the 2025 permission or this application if approved.

7.13 Regarding the building's occupancy, one of the ground-floor retailers left the building in 2021, and the building was vacated entirely in December 2022. The average void rate between 2019 and 2022 (when the building became entirely vacant) was 36.5%. The building has failed to attract significant demand to reduce the void period.

7.14 The 2017 permission sought to refurbish and improve the office space. Bluebook has marketed the property in various guises since 2013, although the recent marketing has principally been in its current condition. The applicant has explored whether there is any interest for the refurbished

scheme, and this has been included in marketing material (including on-site window vinyls and online), but nothing viable has been forthcoming. The agents reviewed the refurbishment scheme and it was concluded that the feasibility of bringing this building to standard to compete in the market was not commercially viable.

- 7.15 The applicant believes that even if this were fully implemented, it would not have overcome all the issues with the space, such as the configuration of small office suites. The applicant believes that development is unviable to pursue, as the net refurbishment costs exceed £20 million, and the rental return is unlikely to meet expectations for a return on investment. The 2017 permission shows a serious attempt to refurbish the premises and make them more attractive to tenants within their existing use.



Figure 4: Google Street View imagery shows that as recently as April 2023, the site was being marketed as improved Grade A office space

- 7.16 Since March 2023 to the submission of the 2025 permission, the building was marketed for single or multiple tenants. The applicant's marketing exercise conducted by Blue Book was following paragraph 44 of the CPG Employment Sites and Business Premises, as summarised below:

- In-house letting details included displaying the property on their website, noting the office use.
- The building was offered based on a new lease at a minimum of 12 months. The rent, including the service charge, was advertised at £65.00 per sq ft. Marketing information include details of a range of accommodation from parts of single floors to the entire building.

- A to-let board was erected at first floor level in 2023.
- The property is also published in Agent Society and Costar Loopnet. These circulate quarterly reminders about Kingsway House's availability around the market.
- Office use is noted on the marketing particulars, including the size of individual rooms and floors.
- Bluebook has been marketing the building since 2013.

7.17 The level of interest in the building was minimal. Therefore, discussions around rental levels and other incentives were never instigated. The property received interest from 13 potential tenants, but none translated into a viewing or serious interest.

7.18 Common reasons for lack of interest were that floorplates were too small, lack of open-plan space, the entrance and lobby were seen as not big enough, not sufficient quality, lack of terraces or outdoor amenity spaces, lack of presence and client-facing space and limited WC provision, EPC ratings of D to E.

7.19 Active office demand is now driven by a demand for high quality, flexible space rather than secondary Grade B offices such as this. The existing floorspace does not provide the type of accommodation, flexibility in accommodation, facilities, or the sustainability credentials that occupiers now expect and that are on offer elsewhere.

7.20 Overall, officers are satisfied that the proposal accords with the aims of Policy E2. The evidence demonstrates that the existing office accommodation is no longer well suited to modern business requirements, has been comprehensively marketed over an appropriate period with very limited interest, and has remained vacant since December 2022. While refurbishment could improve some aspects of the building, its fundamental constraints, including its small floorplates, outdated layout and limited amenities, significantly undermine its competitiveness in the current office market. It is therefore considered that the continued retention of the premises in employment use is not realistic, and the loss of the existing office floorspace is acceptable in principle

7.21 Compensation for loss of employment space

7.22 As per paragraph 54 of the Employment Sites and Business Premises CPG, in these circumstances, where the loss of employment use can be expected to result in a reduction of potential job opportunities for Camden residents, the Council will seek a contribution from developers towards measures which

create or promote opportunities for employment or training of local people. A contribution will only be sought in cases where the net loss of employment space is 500 sqm (GIA) or more. These monies will be held by the Council and used to support activities that create or promote opportunities for employment or training, including the provision of affordable employment space in the borough.

7.23 The calculation of the appropriate contribution will take account of the proposed alternative use of the floorspace and whether this use can be expected to create employment or training opportunities for Camden residents.

- Employment floorspace lost (sq. m) 3,090 / 12 space requirement per full-time employee = 257.5 full-time jobs lost.
- Net jobs lost (263) in employment use minus FT jobs in new hotel use: 263 – 40 (80 bedrooms x 0.5) = 217.5 FT jobs
- Full time jobs lost 217.5 x 21% [% of Camden residents who work in Camden] 47 x £3,995 [cost to provide training per employee] = £182,471.63

Loss of entertainment venue

7.24 4 Great Queen Street was occupied by the Blitz Club between February 1979 and October 1980. The Blitz Club was a wartime-themed bar which hosted a weekly club night (originally held at Billy's in Soho).

7.25 The venue is said to have become "the crucible for the New Romantic movement", a short-lived but highly influential movement in music, fashion and art that shaped the aesthetics of the 1980s. A PRS for Music plaque on the building records that Spandau Ballet first performed there on 5 December 1979 (retention secured by condition 24). The Blitz Club frontage has been replaced and none of the interiors associated with this period remains. It is arguably the movement and its influence on music, art and fashion which is of significance rather than the building itself.

7.26 As existing, 4 Great Queen Street and 62 Parker Street has a lawful use as a nighttime entertainment venue (Sui Generis). The site's most recent and longstanding use is the Red Rooms strip club. It ceased operating during the COVID-19 pandemic in 2020.

7.27 Local Plan Policy C3 (Cultural and leisure facilities) sets out that where a proposal involves the loss of a culture or leisure facility, it must be demonstrated to the Council's satisfaction that there is no longer a demand

for a leisure facility, and consideration as to whether the premises can support alternative cultural and leisure uses which would make a positive contribution to the range of cultural and leisure facilities in the borough.

- 7.28 A Night-time Entertainment and Cultural and Leisure Assessment has been prepared by Savills and accompanies this Application. The site's most recent lawful use is best characterised as a sui generis strip club rather than a protected cultural or leisure facility.
- 7.29 The report includes an assessment of twelve alternative night-time entertainment, cultural and leisure uses. While some, such as arts studios and workspaces, libraries, sports provision, theatres, cinemas, pubs, and live music venues, could in theory fit the footprint, they would have issues including physical constraints imposed by the narrow plot. The site's location on a fringe street with narrow pavements further limits its suitability for high footfall uses. The lawful use is best characterised as a former strip club (Red Rooms) that has been vacant since Covid. Strip clubs are not expressly protected by Camden or London planning policy in the same way as theatres, museums or live music venues.
- 7.30 Officers agree that it is unviable to retain the premises in an entertainment/leisure use. An alternative nighttime venue, such as a Sui Generis bar or music venue, could give rise to residential amenity impacts from comings and goings and general disturbance.
- 7.31 For the reasons provided above a nightclub or other nighttime venue would not be suitable. The redevelopment would not materially diminish the borough's protected cultural and leisure offer and the development complies with CLP Policy C3.

Proposed Class E use on the ground floor

- 7.32 The proposed Class E restaurant and retail uses are welcomed for activating the street frontage and providing commercial space which is supported by Camden Local Plan E1.

Preferred Use for Residential

- 7.33 Policy H1 (a) and (d) regard housing as the priority land use of the Local Plan and make housing the top priority when considering the future of unused and underused land and buildings. While Policy H1 prioritises housing in land use when considering the future of unused and underused land and buildings, it is recognised that other development plan policies support hotel use at this location.
- 7.34 This includes London Plan policies, E10, SD4 and SD5, which support hotels within the CAZ. It is recognised that Policy H1 is worded in such a way as to require consideration of housing for the future of unused buildings, but does

not prevent applications being submitted for other uses, and the Council would not have a strong policy basis for refusing an application at this site for an alternative use to housing.

- 7.35 The applicant demonstrated to Officers' satisfaction that a hotel is an appropriate land use at Kingsway House as part of the 2025 application. As such, 4 GQS is the site where a policy preference for housing applies.
- 7.36 The narrow floor plan and need for separate residential cores with separation from Kingsway House are expected to decrease the efficiency of the plan and fail to optimise the site. It is noted that given the site's location fronting a busy road results in poor air quality. A further challenge would be providing residential units with London Plan compliant external amenity spaces. It would also be challenging but not insurmountable to provide adequate acoustic insulation within the building fabric to ensure future occupiers have adequate on-site amenity.
- 7.37 Notwithstanding any constraints in converting 4 GQS to residential use, the proposed development must be considered on its own merits and the site is well suited to accommodating a hotel, as discussed above and under the 'Proposed hotel use' section below, and there are Employment and Training benefits associated with the proposals to change the offices to a hotel which make it a suitable alternative commercial use.

Proposed Hotel Use

- 7.38 The 2025 Permission establishes the principle of aparthotel use in this location.
- 7.39 London Plan policy E10 recognises the importance of tourism to London's economy. It states that London needs to ensure it can meet tourists' accommodation needs in the capital. The London Plan seeks to deliver 58,000 visitor bedrooms across London by 2041, and the GLA projects that 1,595 net rooms will be required in Camden.
- 7.40 Serviced apartments are a use that is found within the CAZ. The London Plan Policy E10 endorses the provision of "smaller-scale" serviced accommodation in "other parts of the CAZ" (except in wholly residential streets or predominantly residential neighbourhoods) and "subject to the impact on office space and other strategic functions."
- 7.41 Policy E3 of the Camden Local Plan recognises the importance of the visitor economy in Camden. It states that the Council will support tourism development and visitor accommodation. New, large-scale tourism development and visitor accommodation are expected in Central London. This can include serviced apartments with hotel-like amenities and services but with more space and privacy like a traditional apartment.

- 7.42 Camden's Draft Policy IE5 (Hotels and Visitor Accommodation) also recognises the importance of the visitor economy in Camden and will support proposals for additional visitor accommodation that are appropriately sited and where impacts are mitigated. All sizes of visitor accommodation are supported in the CAZ, with preference given to locations with a commercial/tourism character or an existing concentration of uses. All accommodation is required to be easily accessible by public transport, not to lead to a loss of residential accommodation, and not to harm the balance and mix of uses in the area, including local character, residential amenity, services, the environment, or transport systems.
- 7.43 The proposed hotel will provide 80 bedrooms. Of these 10% would be wheelchair accessible (secured by condition 26). A hotel of this size would be acceptable in this location within the Central London Area. It would benefit the area by attracting footfall, supporting local service-sector businesses, and maintaining vibrancy, particularly outside office hours. The proposed use would also bring new jobs to the area. An employment and training benefits package has also been secured (see section 15 below). Providing hotels of this nature could discourage use of permanent homes as unauthorised short stay accommodation by giving customers alternatives. Overall, the principle of a hotel use at the site is acceptable.

Mixed Use Development

- 7.44 Policy H2 (Maximising the Supply of Housing from Mixed-Use Schemes) states that where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. Within the Central London Area, where more than 200 sqm (gross) additional floorspace is provided, up to 50% of all additional floorspace should be housing, subject to certain considerations.
- 7.45 The proposal provides a combined net increase of 596 sqm GIA of commercial floorspace. Accordingly, Policy H2 would require approximately 298 sqm of residential floorspace.
- 7.46 Policy H2 states that on-site housing is expected where 1000 sqm of additional floorspace is proposed as this is sufficient to support the stairs, lifts and circulation space needed to serve them.
- 7.47 In considering whether housing should be provided on-site and the most appropriate mix of housing and other uses, the Council will take into account the impact of a mix of uses on the efficiency and overall quantum of development and whether an alternative approach could better meet the objectives of this policy and the Local Plan.
- 7.48 To meet best design practice, any on-site residential would also be expected to feature a dedicated ground-floor entrance, core, and ancillary ground-floor storage areas. The spatial requirements of such a provision would

significantly impact the usable floor area and reduce active frontage. There would also be issues around a second means of escape associated with building control requirements.

- 7.49 The introduction of residential use alongside the proposed apart hotel would create design, operational, and commercial challenges, making the mixed-use approach on-site unfeasible. Firstly, providing a separate residential entrance and circulation core would reduce active frontage at street level.
- 7.50 In addition, the space required for a dedicated residential lobby, lift, and stair core would consume ground-floor and back-of-house areas, reducing the efficiency of the hotel layout. This reallocation of space would directly result in a loss of hotel bedrooms. The introduction of a residential core would reduce space for hotel support functions such as linen stores, housekeeping rooms, and service circulation.
- 7.51 Operational conflicts would also arise in vertical circulation. With only one lift available for residents, any malfunction would force them to share staircases with hotel guests. Security would become more complex, as mixed-use circulation increases the risk of unauthorised access between residential and hotel areas. Achieving full separation would require additional doors, access controls, and checking systems, adding cost and design complexity.
- 7.52 Managing two distinct occupancy types within a single building would increase staffing requirements, maintenance obligations, and operational complexity. Introducing residential use would complicate the fire strategy, requiring additional compartmentation and protected routes, thereby increasing construction complexity and reducing usable floor area. Overall, a mixed-use arrangement would lead to inefficient floorplates, circulation conflicts, and increased design coordination.
- 7.53 The applicant has confirmed that they do not own any sites suitable for conversion to residential use. The Applicant owns 5-7 Great Queen Street and 58-60 Parker Street. On Great Queen Street, the ground floors are already occupied by commercial businesses which provide an active frontage. It would not be appropriate for these to convert to residential, removing that commercial frontage and generally creating low quality residential space. The upper floors of 6 & 7 already contain residential uses or commercial uses which are tenanted with no immediate break.
- 7.54 Likewise, the upper floors of 58 Parker Street are already in residential use. The ground / basement floors were recently refurbished for a commercial tenant. Again, residential at this level would likely be poor quality given the lack of natural light to these two floors.
- 7.55 5GQS and 60PS is the listed building, which would be more challenging to convert. However, the Upper Floors are let to Wallacespace in conjunction

with their building at 53 Parker Street and currently provide viable commercial space with no immediate or short-term break in leases.

7.56 As such, a payment in lieu towards housing elsewhere in the Borough is considered acceptable, considering the cascade in policy H2. The calculation is as follows as per CPG Housing 2021:

- 596 sqm x 50% = 298 sqm (floorspace target)
- 298 x 1,500 psm = £447,000

7.57 A Financial Viability Assessment was prepared to demonstrate that the contribution was not viable. This was audited by BPS, the Council's independent viability advisor, who has concluded that the PiL is viable. Points of disagreement include the aparthotel's gross development value (GDV), construction costs, and contingency, resulting in the overall conclusion on whether a payment in lieu is viable. The applicant has subsequently agreed to the full payment, and a Section 106 Agreement would secure this.

8. DESIGN AND HERITAGE

Designated and non-designated heritage assets

8.1 The Council is under statutory duties contained within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 and 66 require the Council to have special regard to the desirability of preserving listed buildings or their settings where affected, and, under section 72, to the desirability of preserving or enhancing the character or appearance of conservation areas.

8.2 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision-making. The design and heritage policies set out in the Camden Local Plan (CLP) (Policy D1 and D2) and London Plan (LP) policy on heritage (Policy HC1) all note the importance of character and appearance. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets. The Council has considered the proposed development in relation to these policies and particularly Paras 212 to 221.

Description of Assets and Summary of Significance of Building (s) and Area

8.3 Kingsway House comprises an 8-storey building (plus basement), built in 1906, which occupies 99-107 Kingsway. The building's primary elevation fronts Kingsway, with additional elevations onto Great Queen Street and Parker Street.

- 8.4 4 Great Queen Street and 62 Parker Street are two four-storey late-18th/19th century buildings occupying the plots to the rear of Kingsway House. 4 Great Queen Street also has a basement.
- 8.5 4 Great Queen Street is a terraced house which is likely to date from the late-18th or early-19th century. Any architectural interest has been significantly compromised by extensive internal and external alterations and damage, including fire damage.
- 8.6 62 Parker Street is a warehouse building that is likely to date from the late-18th or early-19th century and may have been developed at the same time as the adjacent 60 Parker Street, which was built after 1815 and before 1828. Any architectural interest has been significantly compromised by extensive internal alterations and damage, including fire damage. Overall, the buildings have suffered an extensive loss of historic fabric and any features which do survive have been heavily compromised by damage and inappropriate alterations.
- 8.7 The buildings within the site are not statutorily listed.
- 8.8 The site is within the Kingsway Conservation Area (KCA), and the Kingsway Conservation Area Statement (2001) identifies Kingsway House as a positive contributor to the conservation area.
- 8.9 The Grade II listed 5 Great Queen Street and Grade II listed 60 Parker Street are immediately adjacent to the site and share a party wall with 4 Great Queen Street and 62 Parker Street.



Figure 5 Heritage map: the two blue ones adjacent to the site are no. 5 Great Queen Street and no. 60 Parker Street (Grade II Listed); the black line demarcates the Seven Dials CA with the Kingsway CA

- 8.10 The proposed development has the potential to impact the significance of these two listed buildings through resulting in a change to their setting. Through the works of demolition associated with the proposed development, there would also be a direct impact on very minor elements of the fabric of the adjacent Grade II listed buildings.
- 8.11 The site is within c.20m of the boundary of the Seven Dials (Covent Garden) Conservation Area (SDCA) and is visible from within its boundary along Great Queen Street and Parker Street. Similarly, the site is visible from within the setting of the listed buildings along Great Queen Street which fall within the Seven Dials (Covent Garden) Conservation Area. Those listed buildings are as follows:
- Grand Connaught Rooms – Grade II* listed building (NHLE: 1393970)
 - Freemasons Hall – Grade II* listed building (NHLE: 1113218)
 - 38 Great Queen Street – Grade II listed building (1113217)
 - 36 and 37 Great Queen Street – Grade II listed building (1113216)
 - 33 and 34 and 35 Great Queen Street – Grade II* listed building (1113215)
 - 30 and 31 Great Queen Street – Grade II listed building (1113214)
 - 27 and 28 and 29 Great Queen Street – Grade II* listed building (1113213)

The design of the proposals

- 8.12 The proposed building on 4 Great Queen Street and 62 Parker Street is a 5-storey frontage with a 2-storey set-back mansard, plus a plant room.
- 8.13 The ground floor is predominantly glazed, with a brick façade above. Window openings from the first to the fourth floor are set into punched openings, with interest and subtle decoration achieved through soldier-course headers and projecting brick banding. The mansard is formed from red metal standing seam, extending to screen the plant sited on the roof. On the two lower inhabited floors of the mansard, dormer windows will bring light into the hotel rooms.
- 8.14 The façade composition has a vertical grid, reflecting the narrow bays and vertical proportions commonly found on surrounding buildings. This provides a rhythm across the elevation and reinforces a vertical emphasis. The design also aligns the floor levels evident within neighbouring historic façades. Details of windows, including depth of reveals, are secured by condition 10.
- 8.15 The use of brickwork for upper floors with subtle brick detailing reflects local character and the windows are appropriately scaled to fit with the wider

streetscape. The windows include subdividing glazing bars to give them scale and interest, reflecting local vernacular.

- 8.16 The mansard treatment to upper floors gives a layered appearance to the frontage. The side elevation, facing east on Parker Street, is formed in brick and follows the stepped profile of the frontage. It has recessed brick panels or infilled windows, which provide interest to an otherwise blank elevation.

Impact of proposals

8.17 *Extensions and alterations to Kingsway House*

- 8.18 The 2025 permission (Ref: 2024/3493/P) included a mansard roof extension to create the 8th floor level and 9th floor plant enclosure. See images below.
- 8.19 Under this application, it is proposed to reduce the massing for Kingsway House by omitting the 8th floor mansard roof extension and 9th floor plant enclosure. Instead, a much smaller increase in the height of the sloping mansard roof above the consented 7th-floor level is proposed.
- 8.20 The extended sloping roof above the 7th floor has been included in the scheme to act as a parapet, providing screening for the plant located at roof level, which is a common device for rooftop plant screening on similar buildings in Kingsway (including some original early C20th examples). It is in keeping with the building's original design
- 8.21 The committee report for the 2025 approval (Ref: 2024/3493/P) sets out that no harm to the significance of the Kingsway Conservation Area was found because of the increased roof level massing on Kingsway House. The proposals comprise a reduction in the overall consented massing for Kingsway House. There would be no harm to the significance of the Kingsway Conservation Area or surrounding heritage assets resulting from the proposed works to Kingsway House. The reduced massing is welcome and provides an improved termination to the building and a better, more coherent roof form than the 2025 approval.

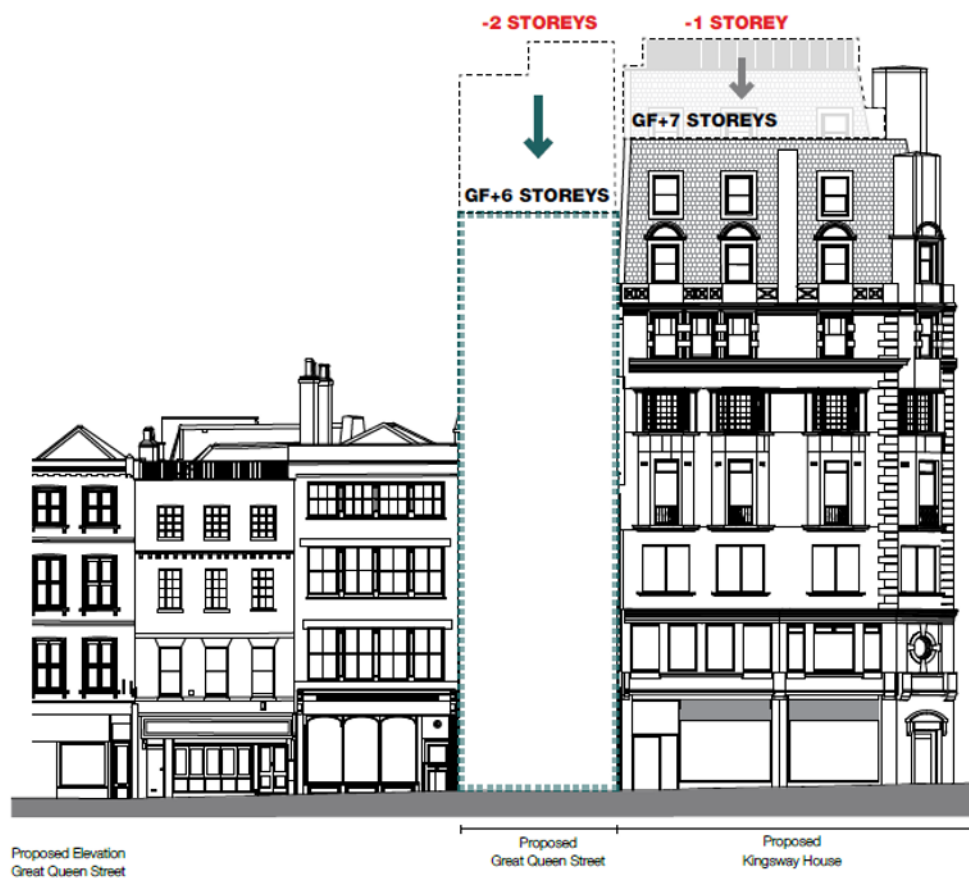


Figure 6: Diagram showing change in massing from approved on Kingsway House and from pre-app at Great Queen Street



Figure 7: 3D View of the 2025 approved extension from Kingsway



Figure 8: 3D View of the 2025 approved extension from further along Kingsway (note the top storey with plant equipment set back but visible from the street)

- 8.22 The proposal reinstates the original oeil du boeuf at entrance level, and the lantern to the main door bay, and the console-pedimented doorcase to the south entrance, which are welcomed as an enhancement.
- 8.23 The principle of thermally upgrading the windows to double glazing is supported. The windows should replicate or retain the historic detailing of the glazing bars and frames. Double glazing may be challenging on the leaded windows, and a secondary glazed option is likely to be needed. Further details of the windows are required by condition 10.
- 8.24 The replacement of the existing solid ground floor façade with glazing will bring activity and passive surveillance to the street. The character of the glazing and integrated stallriser will better align with neighbouring buildings that have similar ground-floor facades.



Figure 9: The proposed development from Kingsway is lower than was approved in 2025 (one storey lower than approved as shown above)



Figure 10: The proposed development from Kingsway is lower than was approved in 2025

8.25 Works of demolition to 4 Great Queen Street and 62 Parker Street

- 8.26 In or around 2023, the previous tenant undertook works to the building with a view to refurbishing the property. In undertaking the strip-out, the tenant discovered the poor, bordering on dangerous, condition of 4 Great Queen

Street and 62 Parker Street and established that the cost of reinstating the property far exceeded any financial viability in its current condition.

- 8.27 4 Great Queen Street / 62 Parker Street are in a deteriorated and derelict condition, have lost most of their internal walls, have damage to the floor structure and roofs which are structurally compromised. Officers have visited the site to verify the issues with the building. The architectural and historic interest of both buildings has been assessed, and it has been found that their heritage significance is so limited as not to merit either building being identified or treated as a heritage asset in its own right.
- 8.28 It is intended that the PRS Plaque recording the location of The Blitz Club where the Spandau Ballet first performed on 5th December 1979 on this part of the site would be retained and reinstated on the Great Queen Street frontage. Its retention on the new building is secured by condition.



Figure 11 Plaque erected by PRS as part of their Music Heritage Award in 2014 - Great Queen Street

- 8.29 The direct effect on the adjacent listed buildings is limited. The site shares a party wall with the two listed buildings at 5 Great Queen Street and 60 Parker Street. Works will be limited to minor interface repairs at the party wall. The structural and foundation design has been undertaken to minimise the potential effects on the party wall.

- 8.30 A structural proposal can be sensitively designed that would minimise the risk of movement to the party walls, and any loss of, or alteration to, the historic fabric of the listed buildings, either through the works of demolition or structural intervention on the site, would be very minimal. An informative is attached noting that work associated with the demolition may require a separate listed building consent.
- 8.31 *Impact on the setting of listed buildings*
- 8.32 4 Great Queen Street and 62 Parker Street are part of the same phase of development as the listed buildings and share certain aspects of the listed buildings' interest, such as their form, scale, materiality, age and historic use. While their considerable degree of alteration means that their setting contribution is diminished, their scale, plot width and general materials (as well as their age) contribute to the setting of the adjacent listed buildings.
- 8.33 While the facades of the proposed replacement building have been designed to reflect the materials and general design of the historic development already within the context of 5 Great Queen Street and 60 Parker Street, the height and mass of the proposed new building would result in a building of greater height and different massing being located immediately adjacent to the listed buildings.
- 8.34 The listed buildings are currently seen and experienced against the sheer flank elevation of the existing Kingsway House in townscape views. The proposed development moves this relationship closer to the listed buildings. While the qualitative impact on the setting remains somewhat similar (in terms of a brick flank wall of greater height rising to the east of the listed buildings), the proximity of that condition is heightened. Therefore, the historic relationship of that condition (a large, then modern, building on Kingsway cutting across the remains of an earlier terrace on the streets to its west) is altered.
- 8.35 The proposed development does cause some harm to the setting of the listed buildings at 60 Parker Street and 5 Great Queen Street, but particularly at 5 Great Queen Street (due to its greater proximity and wider viewing points). The harm to the setting is mitigated by the materials and overall design of the proposed facades and flank wall.
- 8.36 The proposed development causes harm to the setting of both 60 Parker Street and 5 Great Queen Street. However, when compared to the existing context and owing to the materials of the proposed development, that harm is less than substantial, at the very low end of that scale.



Figure 12: Proposed development on Great Queen Street



Figure 13: Proposed development on Parker Street with a more industrial character.



Figure 14: Existing aerial view showing the massing of the site.



Figure 15: Proposed massing of the site.

8.37 *Impact on Kingsway Conservation Areas and the Seven Dials Conservation Area*

- 8.38 4 Great Queen Street / 62 Parker Street has not been identified as a positive contributor to the conservation area within the Kingsway Conservation Area (KCA) Statement. They do form part of two terraces within the KCA, which provide a counterpoint to the scale and appearance of the built form and evidence of the pattern of development that preceded it.
- 8.39 The demolition of the buildings would not harm the character and appearance of the conservation area. There would be no loss of fabric which makes a positive contribution. Whilst demolition itself would not cause harm, the replacement building introduces heritage impacts.
- 8.40 On Great Queen Street and on Parker Street, the replacement building comprises a full five-storey brick building with an additional two-storey setback mansard roof, resulting in an increase in height and mass of one full storey and two setback floors.
- 8.41 The form, mass and detailed design of the two facades of the replacement building respond to the differing contexts and typologies along Great Queen Street and Parker Street. The proposed materials are appropriate to their historic context, and the nature of both frontages means that the visual impact of the two upper storeys is quite limited in visibility, when allowing for the current large brick flank wall to the back of Kingsway House.
- 8.42 The general form and appearance of the proposed building on Great Queen Street is of a traditional townhouse, reflecting the site's plot-width, the form of the terrace the building sits within, and the prevailing typology of the buildings along Great Queen Street.



Figure 16: View of 4 Great Queen Street, 4 storeys with 5th floor mansard

- 8.43 The increased height and mass of 4 Great Queen Street will be seen and experienced in views looking east along Great Queen Street and from limited locations along Kingsway.



Figure 17: Existing view from Kingsway looking towards Great Queen Street



Proposed view looking towards the corner of Kingsway and Great Queen Street.

Figure 18: Proposed CGI from Kingsway looking towards Great Queen Street

- 8.44 From Kingsway, the new massing on Great Queen Street will read as a continuation of the terrace, with the set-back of the mansard element ensuring that Kingsway House retains its primacy in these views. When seen along Great Queen Street, the flank elevation of the new massing will sit within the profile of the rear elevation of Kingsway House.
- 8.45 The existing rear elevation of Kingsway House is largely unrelieved and utilitarian in appearance. However, since the early C20th, the condition of the site and area has been characterised by a dramatic shift in scale between Kingsway House and the earlier terraces on Great Queen Street and Parker Street.
- 8.46 Long-range views of the site along Parker Street are limited due to the narrower street width, road curvature, and enclosing buildings. The multi-storied roofscape is highly characteristic of Kingsway itself and has been so since the 1910s, but it is not historically characteristic of Parker Street or Great Queen Street.



Figure 19: Existing view of site looking down Parker Street

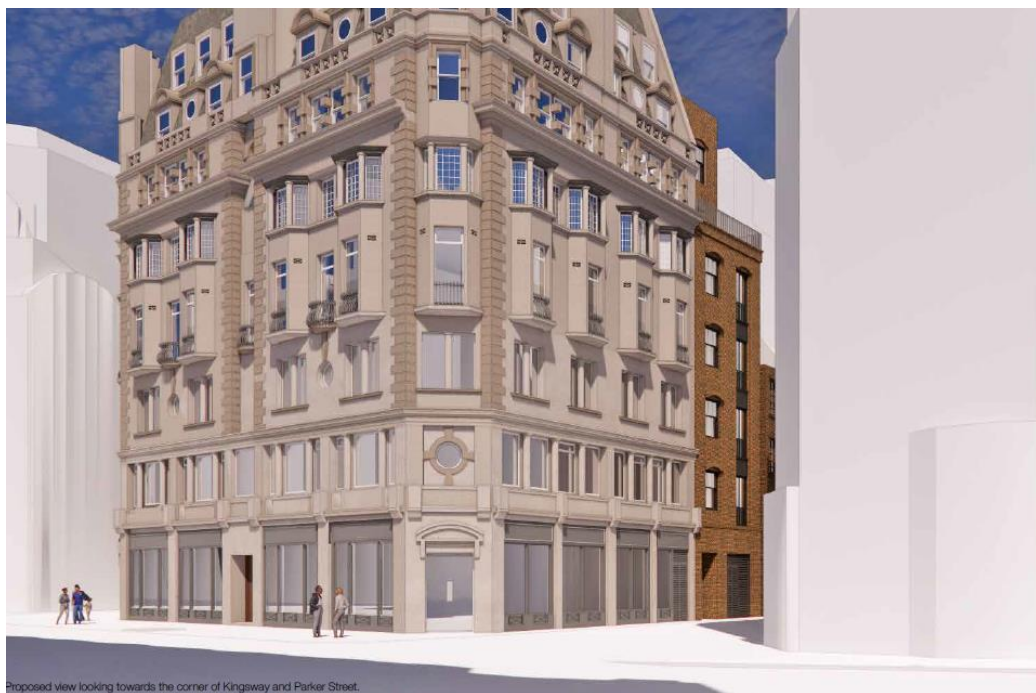


Figure 20: CGI of proposal looking down Parker Street



Figure 21: Aerial view existing



Figure 22: Aerial massing CGI

- 8.47 The Kingsway CAAC has noted that a façade design which closely replicates the design of Kingsway House could be more successful than what is proposed. However, this option has been explored at pre-application stage and resulted in several problems. In the first instance, it significantly affected the intended architectural design of Kingsway House itself and diluted its

legibility as a squarely proportioned Beaux Arts composition. It made Kingsway House appear to have undergone substantial reconstruction to the rear, when in fact it is constructed within its intended historic envelope. It also made it appear that the Edwardian development of Kingsway extended much deeper in Great Queen Street and Parker Street than historically the case.



Figure 23 The proposal is considered at the pre-application stage, was reduced in massing, including Kingsway House

- 8.48 The proposed design is more successful at mitigating and articulating the change in scale from Kingsway into Parker Street and Great Queen Street. It is also noted that the proposal reduces the consented height of Kingsway House so that the massing across the proposed development site is somewhat mitigated. As stated above, the Kingsway House roof level has an improved form compared with the 2025 consent. There is less bulk on Kingsway House, which helps the hierarchy of the building.
- 8.49 The additional height in Great Queen Street and Parker Street, which was historically the case, causes a low level of less than substantial harm to the KCA. This is from the greater height and massing brought further into Parker Street and Great Queen Street than was historically the case.
- 8.50 The abrupt change in scale has historical value but is not especially pleasing or well-considered. It is a product of the way Kingsway was formed, by rapid and strictly linear (i.e. boulevarding) site clearance. The harm to the

character and appearance of the KCA is therefore at the very low end of that scale of less than substantial.

- 8.51 The scheme activates the street frontage along Kingsway, Parker Street and Great Queen Street. The proposed ground floor is shared between the apartment lobby area and a publicly accessible café. The 'shopfront' character is supported and would be subject to a planning condition requiring the submission and approval of materials and detailed drawings prior to the commencement of works, to ensure they are of a high standard.
- 8.52 The demolition of 4 Great Queen Street / 62 Parker Street would remove an element of the setting of the Seven Dials Conservation Area. The setting of this group of heritage assets is defined in part by buildings of the same (if not greater) height and mass as the proposed building. All of the heritage assets in this group are already experienced in conjunction with the sheer flank elevation of the existing Kingsway House, as seen from east down Great Queen Street. This impact would not be noticeably different under the proposed development. Therefore, the impact on the setting of the heritage assets outside of the KCA would be neutral.

Archaeology

- 8.53 Paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.
- 8.54 The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Their advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77135] Area: Lundenwic.
- 8.55 This is a Tier 1 APA centred on the Saxon settlement of Lundenwic. As one of only a handful of major Middle Saxon international trading emporia in England, Lundenwic is of national and international significance for the study of Anglo-Saxon settlement patterns, governance, commerce and economy. If substantial remains of this kind were identified, they would undoubtedly qualify as being of national importance in their entirety and for this reason Lundenwic has been assigned to Tier 1.
- 8.56 The submitted Desk Based Assessment (MOLA, October 2025) identifies high potential for Saxon remains, since the site lies on the projected north-eastern boundary of Lundenwic. These could take the form of cut features, occupation layers, and evidence of structures. The DBA asserts medium significance for such remains, however depending on the level of survival, they could be of high significance. Borehole records suggest prehistoric and post-medieval remains may also be present on the site. The development proposals include piling and groundworks that will harm any surviving

archaeological resource. The site constraints are such that a redesign is unlikely to be practicable, and as such full excavation may be required if the evaluation proves productive.

- 8.57 GLAAS advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case, consideration of the nature of the development, the archaeological interest, and practical constraints is such that GLAAS considers that a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

Heritage conclusion

- 8.58 Section 72(1) of the Listed Buildings Act 1990 directs that “In the exercise of various functions under the Planning Acts in relation to land in conservation areas (including determination of planning applications) the Council is required to pay special attention to the desirability of preserving or enhancing the character and appearance of the Conservation Area.” The works fail to preserve the contribution which the site makes to the character and appearance of the Kingsway Conservation Area but to a less than substantial degree and a very low level of that scale.
- 8.59 Section 66(1) of the Listed Buildings Act 1990 directs that “In considering whether to grant planning permission for development which affects a listed building or its setting, the Council is required to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.” The proposed development causes harm to the setting of both 60 Parker Street and 5 Great Queen Street. However, when compared to the existing context and owing to the materials of the proposed development, that harm is less than substantial, at a very low end of that scale.
- 8.60 The Kingsway House element was reduced by one storey and the new Great Queen Street building by two storeys. The final arrangement comprises a retained ground plus seven-storey Kingsway House alongside a five-storey building with a two-storey mansard-roofed replacement building on Great Queen Street. This creates a stepped composition that provides a transition between the larger scale of Kingsway and the generally lower scale of Great Queen Street, reducing the perceived bulk of the development and ensuring it sits more comfortably within the conservation area.
- 8.61 Paragraph 215 of the NPPF 2024 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of

the proposal including, where appropriate, securing its optimum viable use. The public benefits include bringing vacant and underutilised buildings into active use, generating employment, delivering visitor accommodation in the CAZ, making financial contributions towards affordable housing delivery, and the public realm and transport initiatives. A more complete summary of the public benefits is listed in the Section 19 Conclusion and Planning Balance.

9. IMPACT ON NEIGHBOURING AMENITY

- 9.1 CLP policies A1 and A4 and the Amenity CPG are all relevant 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. Construction work impacts are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and proposed occupiers should be protected, and development, which causes an unacceptable level of harm to amenity, should be refused.

Noise impacts

- 9.2 The proposal includes installing Air Source Heat Pumps (ASHPs) and air conditioning units.
- 9.3 A Plant Noise Assessment, in accordance with BS 4142, has identified the lowest background noise level as being 65 Db(A) and the maximum acceptable noise levels that the proposed plant equipment may emit during both the daytime and nighttime periods. The report concludes that with the proposed mitigation measures, which includes an acoustic enclosure, the noise levels identified should ensure a low likelihood of an adverse impact on amenity.
- 9.4 The Council's Environmental Health Noise Pollution Officer has reviewed the submitted Plant Noise Assessment and has confirmed that the proposals are considered acceptable. The plant can comply with the development plan policies with regard to noise and vibration subject to conditions. Condition 11 will require the installation of anti-vibration measures, and condition 13 will ensure that the cumulative sound level from building services and fixed plant is lower than the existing background noise levels by 10dB(A), and by 15dB(A) where the source is tonal, at the nearest residential receptor.
- 9.5 It is considered that these conditions would ensure that the amenity of neighbouring residents is protected in terms of noise and vibration from the proposed rooftop plant.
- 9.6 The entrance is in the same location as the approved hotel scheme in 2025 and as such comings and goings would not increase noise disturbance.

Daylight and sunlight

- 9.7 Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.
- 9.8 Local Plan Policy A1 is supported by the Camden CPG on Amenity (January 2021) which provides further guidance on the expectations that LBC has when considering the impact of schemes on daylight and sunlight levels. It notes that levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.
- 9.9 A Daylight & Sunlight Assessment accompanies this Application. It has assessed the impact of the extension on neighbouring uses, including buildings in Parker Street and Great Queen Street.
- 9.10 To determine whether a neighbouring existing building may be adversely affected, the initial test provided by the BRE is to establish if any part of the proposal subtends an angle of more than 25° from the lowest window serving the existing building. If this is the case, then there may be an adverse effect, and more detailed calculations are required to quantify the extent of any impact. Properties further afield that comply with the preliminary 25-degree line test do not require detailed assessment, as the daylight and sunlight amenity to them would not be adversely affected.
- 9.11 Daylight has been assessed using the following tests:
- 9.12 **Vertical Sky Component ('VSC')** – is the proportion of the sky dome that can be seen from a point in the centre of a window. The BRE guide suggests that daylighting may be adversely affected if a main window retain less than 27% VSC or less than 0.80 times the VSC in the existing conditions. **No Sky Line ('NSL')** – the area of the working plane in a room that can and cannot receive direct skylight. This test is sometimes termed daylight distribution. The BRE guide suggests that daylighting may be adversely affected if a habitable room retains less than 0.80 times the NSL in the existing conditions.
- 9.13 **No Sky Line ('NSL') or daylight distribution** – the area of the working plane in a room that can and cannot receive direct skylight. This test is sometimes termed daylight distribution. The BRE guide suggests that daylighting may be adversely affected if a habitable room retains less than 0.80 times the NSL in the existing conditions.
- 9.14 Sunlight has been assessed using the following test:
- 9.15 **Annual Probable Sunlight Hours ('APSH')** – the total number of hours in the year that the sun is expected to shine on a window, allowing for average levels of cloudiness. It is recommended that a room retains at least 25%

APSH, including at least 5% during the winter months, or at least 0.80 times the APSH received in the existing conditions, or have an absolute reduction in APSH of no more than 4%.

9.16 Assessment

9.17 The daylight and sunlight assessment considered the following neighbouring properties:

- Hexagon Apartments (Parker Tower);
- Apartments 1–7, 49 Parker Street;
- 58 Parker Street;
- St Anselm and St Cecilia Church, 70 Lincoln's Inn Fields;
- 6 Great Queen Street;
- 7 Great Queen Street; and
- Middle Eight Hotel, 66–70 Great Queen Street

9.18 The assessment concludes that all windows and rooms tested comply with the BRE guidelines for the No Sky Line (NSL) and Annual Probable Sunlight Hours (APSH) tests.

9.19 In respect of the Vertical Sky Component (VSC) test, all windows comply except for one first-floor window at 7 Great Queen Street, which would retain 0.75 times its existing VSC, marginally below the BRE guideline of 0.80. However, this window serves a dual-aspect living/kitchen/dining room with a further compliant window and a skylight.

9.20 The NSL within the room would remain unaffected, and the minor reduction would be unlikely to be perceptible to the occupier.

9.21 The impacts of the proposals are considered acceptable in terms of daylight and sunlight and CLP A1 (Managing the impacts of development)

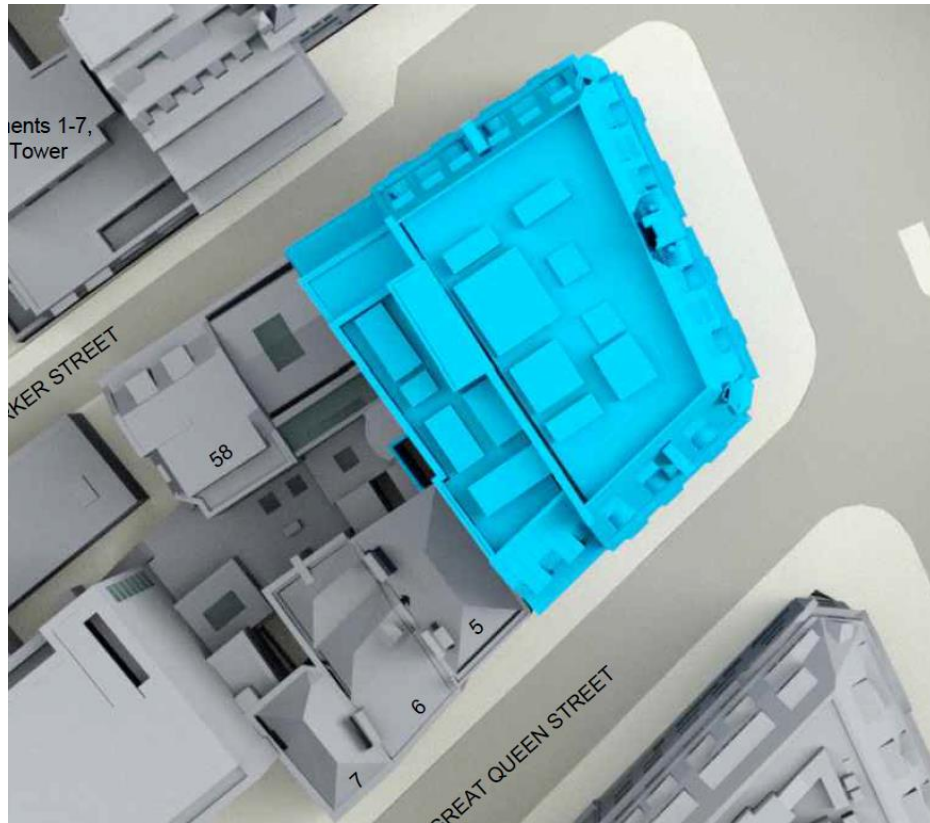


Figure 24: Extract from the D&S report showing relationship of development with 7 Green Queen Street



Figure 25: Photograph of rear windows of 7 Great Queen Street

10. SUSTAINABILITY AND ENERGY

- 10.1 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.
- 10.2 Local Plan policy CC2 expects non-residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

Redevelopment strategy for 4 Great Queen Street and 62 Parker Street

- 10.3 The applicant has submitted a Structural Report and Sustainability Statement to justify the demolition of 4 Great Queen Street and 62 Parker Street. The existing buildings are in poor structural condition due to historic fire damage, prolonged water ingress, and numerous alterations that have compromised the original structural load paths and overall robustness. Whilst temporary stabilisation works have been undertaken, these are short-term measures only and are not considered suitable as a permanent solution. The retention of the buildings would require extensive strengthening and remedial works, with only a limited amount of the existing fabric capable of being retained in its current state.
- 10.4 The applicant also states that the existing floor levels do not align with Kingsway House, preventing efficient integration of the buildings into the proposed hotel. It is therefore argued that demolition and replacement would allow a building that complies with current structural standards, provides improved operational efficiency and offers greater long-term longevity.
- 10.5 The structural condition and feasibility assessment concludes that only a limited proportion of the existing structure at 4 Great Queen Street could realistically be retained due to extensive fire damage, prolonged water ingress, structural deterioration and the significant upgrading that would be required to meet current Building Regulations and accessibility standards. On this basis, the demolition of these buildings, alongside the retention and refurbishment of Kingsway House, represents the most sustainable and practical redevelopment option for the site.
- 10.6 The potential for retaining and adapting the existing buildings was considered during the design process in accordance with circular economy principles. The feasibility of altering or retrofitting the existing buildings has been adequately assessed, with the objective of maximising the reuse of existing materials and building fabric wherever practicable.
- 10.7 A pre-demolition audit was undertaken during RIBA Stage 2 to identify opportunities for material recovery and reuse, while the Circular Economy

Strategy includes measures to reduce resource consumption and construction waste by design. It has been identified that some materials may be suitable for reuse, predominantly off-site.

- 10.8 Condition 22 is attached, which would require that at least 95% of demolition waste and 95% of excavation waste shall be diverted from landfill. The conditions requires the delivery of the measures in the Circular Economy Statement which aims for a minimum of 20% of the total value of materials to derive from recycled and reused content. Sustainable materials are proposed in the new construction to reduce embodied carbon emissions.

Whole life Carbon

- 10.9 The assessment for Whole Life Carbon (WLC) emissions indicates that Construction/upfront (Modules A1-A5) is expected to result in 571kg.CO_{2e}/m² GIA, which meets the 850 benchmark and is marginally over the aspirational 500 benchmark.
- 10.10 The in-use and end of life whole life carbon impact (Modules B-C) (ex B6 & B7 Operational Energy & Water use) of 610 kg.CO_{2e}/m² is significantly over the benchmark of 350 and aspirational benchmark of 300.
- 10.11 The overall total whole-life carbon, including sequestration, is within the benchmark of 1,200 at 1,129 kgCO_{2e}/m² GIA.
- 10.12 With further design and procurement measures, these figures could be reduced to 511 kgCO_{2e}/m² GIA (A1–A5) and 1,067 kgCO_{2e}/m² GIA (A–C).
- 10.13 Further consideration of ways to reduce carbon emissions associated with the development over its lifespan should be undertaken. Emissions should, at a minimum, be within the GLA benchmarks for the in-use and end-of-life phases (B-C). Noting they follow A1-A5 benchmarks. Condition 19 requires the submission of a post-construction Whole Life-Cycle Carbon Assessment. The condition aims to reach a minimum total of 1129, whilst reducing the current 610. Condition 12 requires the applicant, before the development is occupied, to demonstrate that the completed building achieves the Whole Life Carbon performance assessed at application stage (as a minimum) and complies with the GLA's reporting requirements and accords with London Plan Policy SI2 by minimising whole life carbon emissions

Modules	Min benchmark (kgCO _{2e} /m ² GIA)	Aspirational Benchmark (kgCO _{2e} /m ² GIA)	Proposed (kgCO _{2e} /m ² GIA)
A1-A5	<850	<500	571

B-C (excl B6 & B7)	<350	<300	610
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	1129

Table 1 - Whole Life Carbon against GLA benchmarks

Energy (CO2 reduction beyond Part L 2013)

- 10.14 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).
- 10.15 Under CLP Policy and guidance, deep refurbishment is assessed as new build. The application is assessed as a complete development as a "major" and "new build" in sustainability terms, because of the new build portion at 4 GQS and the deep refurbishment works in Kingsway House.
- 10.16 As such, part of the scheme is major new build and part is deep refurbishment. The overall scheme is not treated as a major refurbishment. A composite baseline is used combining the Part L notional building for the new-build elements with the GLA notional existing-building baseline for the retained elements.

Total carbon reductions

- 10.17 Reductions are measured against a baseline, the requirement set out in the Building Regulations. Major development should achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the Building Regulations (Part L of the Building Regulations 2021).
- 10.18 As shown in Table 1 (below), the proposed refurbishment for the new use will reduce emissions by 29% compared to the Part L 2021 baseline, and the proposed energy efficiency measures will reduce emissions by 16% and 13%, as described in the 'Be Lean' and 'Be Green' results section.
- 10.19 In this case, the development does not meet the policy target of 35% reductions, achieving an overall on-site reduction of 29% below Part L requirements, as shown in Table 2 below.

- 10.20 A Carbon offset contribution of £164,265 based on a carbon price of £95 per tonne of carbon dioxide is secured by S106 Legal Agreement to meet the shortfall. This represents a cumulative saving of 1,729 Tonnes (CO₂).

Policy requirement (Commercial)	Min policy target	Proposal reductions
Total carbon reduction: LP policy SI2 and LP CC1	35%	28.7%
Be lean stage (low demand): LP policy SI2	15%	15.8%
Heat Network/Active Savings (Be Clean)	0%	0%
Be green stage (renewables): CLP policy CC1	20%	15.4%

Table 2 - Carbon saving targets and the scheme results

Be lean stage (reduce energy demand) -

- 10.21 London Plan policy SI 2 sets a policy target of at least 15% reduction of carbon emissions beyond the Building Regulations baseline through reduced energy demand at the first stage of the energy hierarchy.
- 10.22 The development meets the policy target of 15%, reducing emissions by 16% at this stage. The emissions savings from the efficiency measures for the rest of the energy use, including energy-efficient lighting and ventilation at the Be lean stage, would be higher.
- 10.23 The hotel will be ventilated by a centralised mechanical ventilation system. An air handling unit (AHU) on the roof will provide ventilation from the eighth floor to the first floor.
- 10.24 The heating and cooling requirements for the building will be met with Variable Refrigerant Flow (VRF) with heat recovery units as there is limited rooftop plant space which restricts the installation of ASHPs for heating and cooling.
- 10.25 Therefore, only the Domestic Hot Water will be met by Air Source Heat Pump (ASHP) units.
- 10.26 The applicant has submitted dynamic thermal modelling as part of the justification for proposing active cooling. The applicant has provided justification for not implementing a secure window mechanism; reasons include:
- safety (suicide and fall prevention), operational, and performance considerations associated with hotel uses.
 - Restrictor only provides limited airflow and not a meaningful contribution to reducing overheating,

- TM54 operational energy modelling predicts that the building will have a very low cooling demand, indicating a low level of reliance on mechanical cooling.
- 10.27 Due to the combination of the above reasons, in this particular case, the exclusion of opening windows is considered acceptable.
- 10.28 Two types of mechanical ventilation are proposed for this development, including an Air Handling Unit (AHU) serving the rooms and hotel room areas, and local MVHR which serves the commercial/communal portions such as retail, F&B, lobby, gym/staff office. These mechanical ventilation systems only provide fresh air into the building; the main heating and cooling element is still required.
- 10.29 Justification provided for not implementing MVHR with air tempering:
- VRF system (current heat and cooling strategy) is still required even with the installation of MVHR.
 - Limited floor to ceiling heights, which restricts ability to accommodate additional ductwork required for MVHR-based solution.
 - Significant plant and distribution requirements
- 10.30 Due to the combination of the above reasons, in this case, the exclusion of MVHR is considered acceptable. The applicant's solution is to use ASHP for domestic hot water, and to have space heating and cooling via VRF system.

Be clean stage (decentralised energy supply)

- 10.31 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 establishing a new network where this is not possible.
- 10.32 In this case, the existing London heat map has been assessed and demonstrated that no existing local networks are present within the scheme's connectable range.

Be green stage (renewables)

- 10.33 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 10.34 In this case, the development does not meet the policy target of 20%, reducing emissions by 15.4% at this stage through renewables. The proposal includes low-carbon heating, such as air-source heat pumps (ASHPs), and

details are secured by condition. The available roof space has been maximised with the provision of photovoltaic panels.

- 10.35 While the roof area suitable for accommodating solar PV panels has been fully utilised at this stage, advances in PV technology may result in higher-capacity panels being available at the time of procurement and/or installation. These panels could generate greater amounts of renewable energy while occupying the same roof area. Accordingly, the applicant should explore the availability of higher-efficiency PV technologies at the detailed design stage and, through an appropriately worded planning condition, demonstrate that such options have been considered and incorporated where technically feasible and viable.

Be seen (energy monitoring)

- 10.36 The London Plan policy SI 2 requires monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting, which would be secured as part of the S106 agreement.

Sustainability (BREEAM)

- 10.37 A BREEAM Pre-Assessment has been carried out, showing that all main targets are met and exceeded per Policies CC1 and CC2 of the Camden Local Plan 2017. The planning requirement for the proposed non-domestic development is an Excellent BREEAM rating (with a minimum of 70% required for an 'Excellent' rating).

- 10.38 The proposal currently achieves a score of 79.4%, which equates to an 'Excellent' rating. The Pre-Assessment report shows that:

- Energy - 14 out of 23 credits are achieved, which equates to 61% with a target of 60%;
- Water - 6 out of 8 credits are achieved, which equates to 75%, with the target being 60%,
- Materials - 12 out of 14 credits are achieved, which equates to 86.6%, with the target being 40%

- 10.39 The BREEAM Pre-Assessment scores are secured under the Energy and Sustainability obligation, which requires submitting a post-assessment report.

Climate change adaptation and sustainable design

- 10.40 The proposal incorporates water-efficient design measures to minimise on-site water consumption. A condition would secure the water usage target of 105 litres/person/day (not including external water use) as required by Local Plan paragraph 8.55.

- 10.41 Hotels are considered high water use developments and therefore the feasibility of grey and rainwater recycling should be undertaken and will need to provide clear and costed justification if considered to not be feasible – see CPG on Water and Flooding for further details. The Applicant has confirmed that greywater recycling is proposed with tanks placed in the basement. Condition 6 requires details of greywater recycling proposals to be submitted to the local planning authority for approval.

Summary

- 10.42 The proposal satisfies policy objectives by optimising sustainability by incorporating best practice design, construction, and operation measures. Based on the above, it is considered the proposals accord policy and guidance regarding sustainability matters and is therefore acceptable in terms of sustainability.
- 10.43 The failure to meet 35% is disappointing; however, this shortfall is due to the Be Green measures (15.4% rather than 20%), which are discussed above and may be able to be improved. The carbon reduction targets for commercial development are more difficult to meet than before due to how the baseline is calculated; we are trying to get that closer by maximising PVs on the roof and have encouraged the applicant to adopt higher efficiency panels if available in future should space be an issue. The carbon offset will mitigate this shortfall. It is allocated to a carbon offset fund, which can be spent on projects to reduce carbon emissions in the borough.

11. FLOODING

- 11.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible.
- 11.2 The Council's third-party independent Flood Risk experts, Metis, have reviewed the drainage information and raised no objection to the proposal, subject to conditions. The submission provides adequate detail for the drainage strategy, runoff rates, attenuation volumes, maintenance arrangements, basement flood risk, and health and safety considerations.
- 11.3 The proposal incorporates three blue/green roofs providing 30.8m³ of attenuation, with runoff restricted to a maximum of 11.1 l/s, delivering an appropriate sustainable drainage strategy for the site. Although a site-specific Flood Risk Assessment has not been submitted, this is acceptable in this instance, having regard to the site's flood characteristics, the limited vulnerability of the basement uses, and the proposed finished floor levels. However, conditions 21 (SUDS) 4 (Flood protection measures) are recommended requiring the submission of a site-specific Flood Risk Assessment, confirmation of a minimum 150mm blue/green roof substrate, details of the management company responsible for maintenance, and flood

protection measures, including finished floor levels and any necessary threshold drainage or other resilience measures, to safeguard the development from potential groundwater and surface water flooding.

- 11.4 Subject to these conditions, the proposal is considered acceptable in flood risk and drainage terms and complies with Policies CC2 (Adapting to Climate Change) and CC3 (Water and Flooding) of the London Borough of Camden Local Plan 2017.

12. AIR QUALITY

- 12.1 The applicant has prepared an assessment of the air quality impacts associated with the proposed development's construction and operational phases.
- 12.2 The site is located in an area with very poor air quality, with the LAEI 2022 NO₂ concentration map showing exceedances of more than 40 µg/m³ in the annual mean, which is not compliant for long-term residential use. For a hotel use, short-term exposure is most representative of how the site will be occupied, and the predicted short-term concentrations remain below the relevant limits. Although the proposed use is for a hotel and guests may not stay there long term, we would want worker exposure to be considered and would not want exposure over 42µg/m³. Mitigation measures should be applied for both workers and occupants where feasible to reduce exposure to poor air quality.
- 12.3 Given that the proposed development does not have openable windows, indoor air quality can be controlled through the placement of air inlets for any mechanical ventilation. The proposed use of a central Air Handling Unit (AHU) enables poor air quality to be addressed through the provision of standard filtration. This system will incorporate appropriate filtration in line with industry standards, thereby improving indoor air quality. In addition, air intakes will be located at roof level where feasible, to minimise exposure to local pollutant sources. On this basis, no further mitigation measures are considered necessary.
- 12.4 The building currently passes the AQ Neutral Transport and Building emissions assessment. No new parking is proposed, and the impact on traffic activity is expected to be small; therefore, transport emissions are considered air-quality neutral. The proposal's air quality neutral assessment shows that the proposed development will fully meet transport and building emissions requirements.
- 12.5 The results of the dust risk assessment indicate that dust soiling from construction activities, at worst, has a 'Medium' risk for demolition, earthworks, construction and trackout. These impacts can be minimised through the implementation of appropriate mitigation measures. With

mitigation in place, residual dust effects from construction will be minimal and are considered to be not significant. Mitigation measures recommended to be secured within the construction management plan through S106.

- 12.6 Air quality impacts from construction and operational traffic are considered to be negligible due to the expected low number of vehicle movements during these phases of the proposed development.
- 12.7 Condition 8, ensures that any emergency diesel generator installed as part of the development does not give rise to unacceptable air quality or amenity impacts. Although emergency generators operate only intermittently, they can emit significant levels of pollutants, particularly nitrogen oxides (NO_x) and particulate matter (PM), during testing and emergency use. In a densely developed urban area, these emissions could adversely affect nearby residents, hotel guests and neighbouring uses if not properly controlled.
- 12.8 Condition 9 requires details of the ventilation strategy to ensure the amenity of the hotel users is satisfactory. The condition requires the submission of details of the mechanical inlet locations.
- 12.9 Overall, it is judged that the proposed development is consistent with Paragraph 180 of the NPPF, being appropriate for its location regarding its effects on the local air quality environment. The proposed development is compliant with the Camden Council Local Plan and Policy SI1 of the London Plan.

13. TRANSPORT

- 13.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit car parking availability and requires all new developments in the borough to be car-free.
- 13.2 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.
- 13.3 It is the Council's intention to transform Holborn into a place for people with attractive, healthy, accessible, and safe streets for everyone, and ensure getting around by sustainable and healthy types of transport is easier and faster. This is being progressed through the Holborn Liveable Neighbourhoods project creating ideas such as widening pavements, making some areas car free, improving cycle routes, adding public spaces and plants and trees.

13.4 In terms of the wider context, [Camden's Transport Strategy](#) (CTS) aims to transform transport and mobility in Camden. The CTS sets our objectives, policies, and measures for achieving this goal. CTS priorities include:

- increasing walking and cycling;
- improving public transport in the Borough;
- reducing car ownership and use;
- improving the quality of our air; and
- making our streets and transport networks safe, accessible, and inclusive for all.

Parking including car-free

13.5 Policy T2 seeks to limit parking availability and require all new developments in the borough to be car-free.

13.6 The new hotel would be secured as car-free through a section 106 legal agreement, restricting the hotel from obtaining any on-street parking permits in connection with the development.

Disabled car parking

13.7 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '...all non-residential developments should provide access to at least one on or off-street disabled persons parking bay.' Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: 'All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'

13.8 Paragraph 5.19 of the Camden Planning Guidance on Transport states: 'For all major developments the Council will expect that disabled car parking is accommodated on-site.' Paragraph 5.20 further informs: '...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site'.

13.9 An off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location ideally within 50m from the site is required.

13.10 Officers expect the vast majority of staff and visitors to travel to the site by sustainable modes of transport. However, there is the potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. This would put pressure on infrastructure, which has been provided primarily for local stakeholders. Officers, therefore, suggest that an additional EVCP (fast charger on an island buildout) be provided on the public highway in the

general vicinity of the site. A financial contribution of £20,000 will be secured by legal agreement in accordance with Local Plan Policies A1 and T1.

CPZ Review

13.11 In 2023, a review of the CTS was undertaken and a delivery plan set out for the period covering 2024/25. This was presented to [Culture and Environment Scrutiny Committee on 6th February 2024](#). This committed to deliver a package of Parking Management measures to reduce motor vehicle ownership and use, traffic levels and vehicle emissions in the Borough:

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

13.1 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 can potentially increase on-street parking pressure, which may drive demand for CPZ reviews. Considering the proposed development's scale and location, it is appropriate to request a contribution of £15,000 towards the CA-D CPZ review, which will likely take place in 2025/26.

Coach parking and taxis

13.2 We would be concerned over the possibility of the hotel attracting the arrival of coach parties (which may be outside the applicant's control) causing delays and safety issues on Kingsway and other streets near the site. The applicant has agreed to a planning obligation, to be secured by legal agreement, stating that no coach party bookings will be accepted and that customers will not be picked up or dropped off by coach at any time directly outside the hotel, following Camden Local Plan Policy E3 (paragraph 5.60).

13.3 A taxi bay with space for three vehicles is located on Great Queen Street, approximately 80m from the hotel entrance. Taxis could also lawfully stop adjacent to the site on Great Queen Street to pick up or drop off passengers.

Cycle parking

13.4 The Council requires high-quality cycle parking to be provided in accordance with Local Plan Policy T1, London Plan Policy T5 (1 space per 20 bedrooms long-stay and 1 space per 50 bedrooms short-stay), CPG Transport, and the London Cycling Design Standards (LCDS).

13.5 The current site does not include any dedicated cycle parking spaces. A dedicated long-stay cycle store is proposed at basement level with access proposed from Parker Street. A dedicated cycle store with 8 long-stay parking spaces, using a two-tier cycle parking rack, is proposed for the

basement level. Given the constraints of the existing building, cycle parking would only be accessible via the stairs from ground-floor level, with a cycle ramp provided. Whilst this is not strictly in line with the policy, it is a considerable improvement on the existing situation and is therefore considered acceptable and secured by condition. Cycle parking details will be secured by condition.

- 13.6 A contribution of £3,300 will be secured by legal agreement to provide additional 11 visitor cycle parking spaces on the public highway in the vicinity of the site.
- 13.7 The cycle parking proposals comply with Local Plan Policy T1 and London Plan Policy T5.

Trip generation

- 13.8 The Kingsway Building was vacated entirely in December 2022. The average void rate between 2019 and 2022 (when the building became entirely vacant) was 36.5%. So since at least 2019 the site has not been fully occupied.
- 13.9 The TRICS database was used to derive the anticipated total person trip rates for the proposed development. The Transport Assessment (TA) submitted with the application does not calculate trip generation for the existing vacant office/Sui Generis uses as the assessment baseline. The transport baseline is set out as the consented 2024/3493/P scheme, not the historic but lawful uses. The trip generation tables in the TA looks at the net increase from 58 hotel rooms to 80 hotel rooms, rather than comparing the expected number of trips from the proposed 80 hotel room development against trips from the former office or nightclub uses.
- 13.10 The increase from 58 to 80 aparthotel rooms as part of the expanded development is forecast to generate:
- 7 additional two-way person trips in the AM peak hour (08:00–09:00)
 - 1 additional two-way person trips in the PM peak hour (17:00–18:00)
 - 134 additional two-way person trips daily
- 13.11 The total change in multi-modal trips, presented in Table 6.5 of the Transport Assessment, is reproduced here:

Mode of Travel	AM Peak Hour (08:00-09:00)	PM Peak Hour (17:00-18:00)	Daily (06:00-22:00)
Underground / DLR	7	9	127
Overground	1	1	8
National Rail	2	4	63
Bus, minibuss or coach	2	2	32
Motorcycle, scooter or moped	0	0	3
Driving a car or van	1	0	8
Car / Taxi Passenger	2	2	45
Bicycle	0	1	4
On foot	11	20	199
Total Person Trips	25	40	487

Table 3: Total development trips

13.12 The proposed hotel would generate a different pattern of pedestrian activity throughout the day and evening to a hotel. Hotel guests, employees, and visitors would place pressure on pavements, crossings, and cycle facilities at times when office trips are typically low, particularly in the evenings and on weekends, along a busy street such as Kingsway and elsewhere in the Holborn area.

13.13 The anticipated high volume of walking trips is likely to be made from London Underground station at Holborn, the bus stops on Kingsway, and commercial, entertainment, shopping, and restaurant venues in Holborn. Considering the increase in active travel to and from the site, the applicant will provide a financial contribution towards cycle and pedestrian safety improvements on High Holborn, including the Holborn Liveable Neighbourhood (HLN) project.

Highways works

13.14 It is not known if the proposal would require any physical alterations to the public highway. However, a modest highways contribution of £20,000 towards repairing any damage potentially caused to the public highway during construction will be secured by legal agreement.

Travel planning

13.15 An Outline 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 should be set for both walking and cycling in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

13.16 A legal agreement will secure a Travel Plan covering an associated monitoring and measures contribution of £11,348.

Managing and mitigating the impacts of construction

- 13.17 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A Construction Environmental Management Plan was submitted with the application; however, the document does not adhere to Camden guidance on construction management. The applicant is required to resubmit a detailed Demolition Management Plan (DMP) and Construction Management Plan (CMP) using the Council's proforma as part of the S106 Legal Agreement.
- 13.18 The site is located on Kingsway, which forms part of the strategic road network and 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 adversely affecting amenity or the safe and efficient operation of the local highway network.
- 13.19 Implementation support contributions of £35,000 and impact bonds of £35,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1.
- 13.20 A 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.

Servicing

- 13.21 A delivery and Servicing Plan (DSP) was provided with the application. The proposal is expected to generate 10 two-way servicing trips per day.
- 13.22 Servicing will remain in line with the existing arrangements. There are two inset loading bays of approximately 14 metres in length located close to the site on Parker Street, including one bay adjacent to the site on the eastern side of Parker Street. Deliveries for the aparthotel will take place via the lobby at the corner of Kingsway and Parker Street, from the entrance at the corner of Kingsway and Great Queen Street for the retail unit. Waste collection will take place on Parker Street.
- 13.23 The Council consulted on proposals for the Newton Street area which, if approved, will result in the inset loading bay near the junction with Newton Street being removed. Newton Street, Parker Street & Macklin Street -

Holborn Liveable Neighbourhood Starter Project Consultation. A Delivery and Servicing Plan have been secured by S106 Legal Agreement.

Pedestrian, cycling and environmental improvements

13.24 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes we are delivering across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on our ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a funding source.

13.25 This contribution is based on an assessment of the transport impacts arising from the current application and also the site's former lawful uses, which have been vacant for a prolonged period.

13.26 The Council is developing proposals which will transform the public realm in the area and enhance the attractiveness of many streets for pedestrians and cyclists. Considering the anticipated high increase in cycle and walking trips generated by the proposed development, and further promoted by the Travel Plan, we will seek a financial contribution of £60,000 towards:

- the aforementioned HLN project, specifically;
- improving the look and feel of the Kingsway and Great Queen Street area;
- upgrading the road and pavement materials and evaluating parking and loading, wider pavements, and Cycleway 52 upgrades on Newton Street and surrounding streets;
- relocating the kiosks outside Holborn Station, adding plants and trees, and removal of unneeded street clutter; and
- cycle and pedestrian safety improvements on High Holborn.

13.27 This contribution would be secured by S106 legal agreement.

Micromobility improvements

13.28 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.

- 13.29 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 13.30 A contribution of £10,000 towards cycle/e-scooter hire improvements would therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for parking dockless rental e-bikes and e-scooters in the local area (e.g., by expanding existing bays and adding new ones). 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.

Summary

- 13.31 Overall, the proposal is acceptable in terms of transport implications. It is car-free and located in a highly sustainable, accessible area that aligns with planning policy. The proposal will not generate significant vehicular traffic and, as such, will not significantly impact the capacity of the surrounding highway network. Conveniently accessible long-stay and short-stay cycle parking would be provided. The impacts of the scheme will be mitigated by contributions which support the use of sustainable modes of transport.

14. REFUSE AND RECYCLING

- 14.1 Policy CC3 (Waste) states that the Council will seek to make Camden a low-waste borough. Part (d) of the policy states that we will ensure that developments include facilities for the storage and collection of waste and recycling.
- 14.2 Bins for the Aparthotel will be stored in a dedicated waste store in the basement. Bins will be moved from the basement waste store to ground-floor level by the on-site management team via a hoist.
- 14.3 A waste presentation area will be provided at ground floor level, adjacent to Parker Street, to provide for the temporary storage of waste prior to collection. Smaller deliveries to the aparthotel would be undertaken via the main entrance at Kingsway/Parker Street. Waste for the retail unit will be stored within the unit and moved on-street for daily collection
- 14.4 Condition 27 requires the applicant to submit details of the proposed refuse and recycling storage and collection arrangements for the hotel to the Local Planning Authority for approval. The submitted details should demonstrate that adequate storage capacity, bin provision and collection arrangements have been incorporated into the development. Refuse collection for the

aparthotel will be undertaken from Parker Street, while refuse collection for the retail outlet is expected to be from Great Queen Street.

- 14.5 An informative (6) reminds the applicant that filled refuse sacks shall not be deposited on the public footpath, or forecourt area until within half an hour of usual collection times. The Council's Environment Services (Rubbish Collection) team manage this.

15. FIRE SAFETY

- 15.1 London Plan policy D12 Fire Safety requires all development proposals to achieve the highest standards of fire safety and incorporate the necessary measures to ensure the safety of occupants. All major development proposals should be accompanied by a Fire Statement produced by a suitably qualified assessor detailing how the development proposal will function in terms of 1) construction methods, products and materials; 2) means of escape; 3) features reducing risk to life; 4) access for fire services and equipment; 5) provision within the site curtilage for fire appliances to access the building; 6) ensuring any potential future modifications to the building will not compromise the base build fire safety/protection. Policy D5 (Inclusive Design) is also relevant regarding providing safe and dignified emergency evacuation for all building users.
- 15.2 The Mayor introduced the London Plan policy to ensure fire safety is addressed at the outset when planning permission is applied for, instead of the issue being first considered at the Building Control stage. The Fire Safety London Plan Guidance accompanies the London Plan policy. The guidance states that the onus is on the applicant to demonstrate compliance with D12 and D5 by engaging fire safety professionals, and that the planning officer must ensure that the information has been provided. The review of the fire safety measures and their compliance with building regulations and standards will still take place at the Building Control stage. It shall not be undertaken by planning officers.
- 15.3 The application is accompanied by a "Fire Safety Statement" document outlining the critical fire safety features incorporated within the development. The submitted document has been prepared by Fire Safety Statement and prepared by Semper, a firm of qualified fire engineering consultants. It provides information on means of escape (including disabled refuge spaces), fire resistance to building structure elements, smoke clearance vents, fire-fighting staircase core provision, alarm systems and fire suppression measures.
- 15.4 Given the above, the proposals are considered to comply with London Plan policies D12 and D5 and condition 17 ensures that the fire strategy is implemented in accordance with the approved report.

16. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 16.1 Camden Local Plan policies E1, E2 and CPG – Employment sites and business enterprises seek to secure a successful and inclusive economy. Camden will support local enterprise development, employment and training schemes for Camden residents and recognise the importance of other employment-generating uses, including retail, education, health, markets, leisure and tourism. The Council's Inclusive Economy Team have been consulted on the application, and their comments are incorporated below.
- 16.2 The Council will expect developers to assist with training and employment initiatives via section 106 agreements where the development impacts the availability of jobs for Camden residents. The Council will expect schemes of 1,000 (GIA) or larger to provide employment or training initiatives secured through a section 106 agreement with the Council unless evidence demonstrates that the scheme is below the £3m build cost trigger.
- 16.3 In this case, the build costs are estimated at £32.6 million. The applicant must recruit 11 construction apprentices paid at least a London Living Wage and pay the council a support fee of $£11 \times £1,700 = \underline{£18,700}$ (£1,700 per apprentice as per section 63 of the Employment Sites and Business Premises CPG). The construction apprenticeships and contributions would be secured through a s106 legal agreement.
- 16.4 The council may seek a financial contribution to assist residents in receiving training in the skills that would enable them to access the jobs created by the new development. This contribution will be held by the Council and used to support activities that create or promote employment or training opportunities.
- 16.5 The training and skills payment is calculated as follows $40 \times 21\%$ [% of Camden residents who work in Camden] $8.4 \times 35\%$ [% of employees requiring training] $2.94 \times £3,995$ [£ per employee requiring training] = £11,745.30
- 16.6 Regarding Construction Work Experience Placements, there is an expectation for the applicant to provide a set number of work experience placements (being one placement per 500m² of employment floorspace) of not less than 2 weeks each, to be undertaken throughout the development, and to be recruited through the Euston Skills Centre, as per section 69 of the Employment sites and business premises CPG. The hotel provides 4,780 sqm C1 floorspace, equating to 9 construction work experience placements. The applicant has agreed to 9 construction work experience placements, which will be secured through a section 106 legal agreement.
- 16.7 Regarding Local Recruitment, Camden's standard local recruitment target is 20%. The applicant should work with the Euston Skills Centre to recruit for

vacancies, advertising with us for no less than a week before the roles are advertised more widely.

- 16.8 Regarding Local Procurement, the applicant would also sign up for the Camden Local Procurement Code (to be secured as part of the section 106 legal agreement), as per section 61 of the Employment Sites and Business Premises CPG. Camden's local procurement code sets a target of 10% of the total value of the construction contract. Spending a significant proportion of the total construction build cost on supplies/suppliers and sub-contractors within the Camden borough area will support local businesses and the overall functioning of the local economy.
- 16.9 The proposal also presents opportunities to secure end-use / occupation phase benefits. In this regard, a Section 106 legal agreement would secure 3 end-use apprenticeships (on a rolling term) for the hotel operation.
- 16.10 The applicant has also confirmed their commitment to ensuring the site offers local employment benefits in the long term by:
- Joining the Council's Inclusive Business Network and promoting this and good employment practice to occupiers
 - 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

17. BIODIVERSITY NET GAIN AND BIODIVERSITY

- 17.1 Based on the information available, this permission will not require the approval of a Biodiversity Gain Plan before development is begun because it is below the de minimis threshold, meaning it does not impact an onsite priority habitat and impacts less than 25sqm of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of linear habitat.
- 17.2 The available roof area has been optimised to accommodate the blue roof infrastructure required to meet SuDS objectives, as well as PV panels and essential plant equipment. the proposed blue roof provides a degree of ecological benefit compared to a conventional roof due to the small section of planting shown in the blue roof build-up.

18. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 18.1 The proposed development is liable for both Mayoral and Camden CIL. The amount to pay is the increase in floorspace (m2) multiplied by the rate in the CIL charging schedule:

Mayor CIL2

Hotel - £140 sqm (Central London and Isle of Dogs)

Camden

Hotel - £110 sqm (Zone A – Central)

- 18.2 The CIL figures would be subject to the verification of the proposed floor area and calculations by the Council's CIL team.

19. CONCLUSION

- 19.1 The application seeks the refurbishment, extension and change of use of Kingsway House together with the demolition and redevelopment of 4 Great Queen Street and 62 Parker Street to provide a high-quality Class C1 apart-hotel with retained Class E commercial floorspace at ground floor level.
- 19.2 The application satisfies the requirements of Local Plan Policy E2 in relation to the loss of employment floorspace. The submitted marketing evidence, prolonged vacancy, changing office market conditions and previous attempts to refurbish the building for continued office use demonstrate that the site is no longer suitable for its existing business use. The proposal also satisfactorily demonstrates that the existing entertainment venue is no longer viable in accordance with Policy C3.
- 19.3 The principle of visitor accommodation is supported by the London Plan and Camden Local Plan, which seek to provide additional visitor accommodation within the Central Activities Zone. The proposal would contribute towards meeting this need whilst supporting the local economy and creating employment opportunities.
- 19.4 Although the redevelopment of 4 Great Queen Street would result in less than substantial harm to the significance of the Kingsway Conservation Area and the setting of adjacent listed buildings, that harm is assessed to be at the very low end of the spectrum and in accordance with paragraph 215 of the NPPF is outweighed by the public benefits of the scheme, including bringing vacant and underutilised buildings into active use, employment generation, the delivery of visitor accommodation, financial contributions towards housing delivery, and public realm and transport improvements.
- 19.5 The development would not result in unacceptable impacts on neighbouring amenity, transport, flood risk, air quality, sustainability, biodiversity or other environmental considerations, subject to the recommended conditions and Section 106 obligations.
- 19.6 Overall, the proposal represents sustainable development that accords with the National Planning Policy Framework, the London Plan, the Camden Local Plan and relevant supplementary planning guidance. Planning permission is

therefore recommended, subject to the completion of a Section 106 Agreement and the conditions set out below.

19.7 The proposal would:

- deliver a high-quality architectural design that seeks to respond to the differing townscape character of Kingsway, Great Queen Street and Parker Street whilst also making efficient use of land. The development would preserve the significance of Kingsway House as a positive contributor to the Kingsway Conservation Area while. The redevelopment of 4 Great Queen Street and 62 Parker Street, would result in less than substantial harm at a low level, impacting on the setting of nearby listed buildings and the conservation area;
- it would bringing long-term vacant and underused buildings back into active use, delivering 80 apart-hotel rooms within a highly accessible Central Activities Zone location and supporting the local economy;
- provide active commercial frontages and publicly accessible food and beverage uses that would enhance street activity and vitality on Kingsway, Great Queen Street and Parker Street;
- deliver a retrofit-led approach through the retention and refurbishment of Kingsway House alongside the redevelopment of the adjoining site;
- promote sustainable travel through a car-free development with cycle parking and contributions towards off-site cycling infrastructure; and
- generate Community Infrastructure Levy and significant planning obligations, including contributions towards affordable housing, employment and training, highways, sustainable transport and other local infrastructure secured through a Section 106 Agreement.
- Whilst great weight is given to the preservation of heritage assets, overall the benefits of the scheme are considered to outweigh the low level of harm identified to heritage assets.

20. RECOMMENDATION

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

Payment in lieu of housing

- Payment of £447,000

Energy and sustainability

- Energy Plan

- A Carbon offset contribution of £164,226
- Sustainability plan (BREEAM compliance) – secure 79.4%, which equates to an ‘Excellent’ rating:
 - Energy - 14 out of 23 credits are achieved, which equates to 61%
 - Water - 6 out of 8 credits are achieved, which equates to 75%
 - Materials - 12 out of 14 credits are achieved, which equates to 86.6%

Transport

- Car-free development
- Travel Plan and associated monitoring and measures contribution of £11,348.
- Off-site contribution of £4,000 for a disabled parking space.
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- CA-D CPZ review contribution of £15,000.
- No coach party bookings and a ban on customers being picked up or dropped off by the coach at any time outside the hotel.
- Construction management plan (CMP) CMP implementation support contribution of £35,000 and CMP Impact Bond of £35,000
- Construction Working Group
- Highway works contribution of £20,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £60,000
- Micromobility improvements contribution of £10,000.
- Delivery and Servicing Management Plan
- A £3,300 contribution for an off site bike hanger

Employment and training

- Payment for loss of employment generating use £182,471
- Payment to fund skills and training of £11,745.30
- 3 x end-use apprenticeships (rolling term) for the hotel operation.
- 11 construction apprentices paid at least a London Living Wage plus a support fee of £18,700
- 9 construction work experience placements recruited through the Euston Skills Centre
- 20% local recruitment
- 10% local procurement
- Joining the Council’s Inclusive Business Network and promoting this and good employment practice to occupiers
- 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

21. LEGAL COMMENTS

21.1 Members are referred to the Legal Division's note at the Agenda's start.

22. CONDITIONS

1	Time Limit Condition The development hereby permitted must be begun not later than the end of three years from the date of this permission. Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).
2	Approved Drawings The development hereby permitted shall be carried out in accordance with the following approved plans and supporting documents: Existing Drawings: A025-001 P1; A025-099 P1; A025-100 P1; A025-101 P1; A025-102 P1; A025-103 P1; A025-104 P1; A025-105 P1; A025-106 P1; A025-107 P1; A025-108 P1; A025-150 P1; A025-151 P1; A025-152 F1; A025-200 P1; A025-201 P1; A025-202 P1; A025-203 P1. Demolition Drawings: A050-099 P1; A050-100 P1; A050-101 P1; A050-102 P1; A050-103 P1; A050-104 P1; A050-105 P1; A050-106 P1; A050-107 P1; A050-108 P1. Proposed Drawings: A100-001 P1; A100-099 P1; A100-100 P1; A100-101 P1; A100-102 P1; A100-103 P1; A100-104 P1; A100-105 P2; A100-106 P1; A100-107 P1; A100-108 P1; A100-150 P1; A100-151 P1; A100-152 P1; A100-153 P1. Application Documents: Application Document Schedule 8 December 2025; Application Drawing Register 28 November 2025; Covering Letter 8 December 2025; CIL Form 8 December 2025; Site Location Plan (Scale 1:1250) 28 November 2025; Existing Site Plan 28 November 2025; Proposed Site Plan 28 November 2025; Application Drawings 28 November 2025; Design & Access Statement November 2025; Heritage Statement December 2025; Structural Report 28 November 2025; Archaeological Assessment October 2025; Planning Statement 5 December 2025; Marketing and Loss of Employment Report - Kingsway House 27 November 2025; Leisure Use Assessment - 4 Great Queen Street September 2025; Outline Construction Logistics Plan November 2025; Daylight and Sunlight Assessment 8 December 2025; Preliminary Ecology Appraisal 28 November 2025; Energy Statement 28 November 2025; Whole Life Carbon Assessment 28

	November 2025; Circular Economy Statement (including Pre-Demolition Audit) 28 November 2025; Sustainability Statement (including BREEAM) 28 November 2025; Overheating Assessment 28 November 2025; Acoustic Report 28 November 2025; Air Quality Assessment 28 November 2025; Transport Assessment November 2025; Travel Plan November 2025; Delivery and Servicing Management Plan November 2025; Sustainable Drainage Systems Strategy 28 November 2025; Fire Statement 5 December 2025. Reason: For the avoidance of doubt and in the interest of proper planning.
3	Matching Materials All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application. 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	Flood protection measures Prior to the commencement of the development (excluding site clearance and enabling works), full details of the proposed flood protection measures shall be submitted to and approved in writing by the Local Planning Authority. These details shall include: a) confirmation of Finished Floor Levels (FFLs) between +22.11m and +22.34m AOD at entrances identified as being at risk during a 1 in 100 year surface water flood event plus an allowance for climate change; and b) details of any additional flood protection features, such as threshold drains or other measures necessary to manage overland flow routes and prevent water ingress. The development shall be carried out in full accordance with the approved details. The approved flood protection measures shall thereafter be retained and maintained for the lifetime of the development. Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.
5	London Underground infrastructure The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and

	permanent), have been submitted to and approved in writing by the local planning authority which: a) Provide details of change in building loads and assessment of associated ground movement impact on LU structures and tunnels due to demolition, construction, temporary works, cranes and other heavy vehicles and plant. The ground movement assessment report should describe predicted impacts and proposed measures to protect LU assets from direct or indirect damage; b) Provide detailed design and RAMS on the use of tall plant/scaffolding/lifting equipment; and c) Details of changes to lift shaft. The development shall be carried out in full accordance with the approved details. Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
6	Greywater harvesting Prior to commencement of development (other than site clearance & preparation), details of greywater recycling proposals should be submitted to the local planning authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details. 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 2017 and Policy SI 13 of the London Plan 2021.
7	Archaeology written scheme of investigation No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. The written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the

	programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Where appropriate, details of a programme for delivering related positive public benefits C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WS I. Reason. To safeguard the archaeological interest on this site in accordance with Policy D2 of Camden Local Plan 2017, London Plan policy HC1 and the guidance of the NPPF.
8	Diesel back up generator details and dispersion modelling Prior to commencement of above ground works, excluding demolition, details of the proposed Emergency Diesel Generator Plant and any associated abatement technologies including make, model and emission details including dispersion modelling shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. The flue/exhaust from the generator should be located away from air inlet locations or publicly accessible spaces and any emissions shown to adequately disperse. 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	Mechanical Ventilation Prior to commencement of above ground works, excluding 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 and the boiler/ CHP stack or any other emission sources and as close to roof level as possible, and include particulate filtration if appropriate 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	Detailed Drawings Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority: a) Details including sections at 1:10 of all new and replacement windows (including jambs, head and cill), including drawings to show the depth of the window reveals, ventilation grills, external doors and gates; b) Plan, elevation and section drawings, including fascia, cornice, pilasters and glazing panels of the new shopfronts at a scale of 1:10; c) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) (can be high resolution photographs) and samples of those materials (to be provided on site). 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.
11	Vibration Prior to first 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 safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.
12	Whole Life-Cycle Carbon Assessment (with targets) Prior to the occupation of the development:

	a) the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to Planning Authority along with any supporting evidence as per the guidance. b) Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the development. c) The Whole Life Carbon should not exceed 1129 kg CO₂e/M² GIA overall for Modules A-C (excluding B6 & B7 including sequestered carbon), and should at least meet the GLA WLC benchmarks for each of the modules as defined in the GLA Whole Life Carbon Assessment guidance. Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Londo Plan policy SI2.
13	Noise from Plant The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.
14	Water Use The development hereby approved shall achieve a maximum internal water use of 110litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with. Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.
15	Cycle Parking The cycle facility at basement level to accommodate 8 long-stay cycle parking spaces using a two-tier cycle parking shall be provided in its entirety prior to the first occupation of any of the new hotel rooms, and permanently retained thereafter. Reason: To ensure the development provides adequate cycle parking

	facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.
16	Premises to only be used as an apart-hotel (Class C1) Notwithstanding the provisions 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 not be used other than as a hotel within a single planning unit. Reason: In order to ensure that the site is not used as permanent residential accommodation and to protect the amenities of the surrounding area in accordance with policies A1, A4, CC4, H6, and D1 of the London Borough of Camden Local Plan 2017.
17	Fire safety The development shall at all times be occupied and managed in strict compliance with the Fire Statement prepared by B-First dated July 2024. Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan 2021.
18	Waste and recycling storage The waste and recycling storage shown on the approved plans and shall be provided prior to the commencement of the use hereby permitted, and shall thereafter be retained for the duration of the development. Reason: To ensure suitable provision for the occupiers of the development, to encourage the sustainable management of waste and to safeguard the visual amenities of the in accordance with policies CC5, D1 and D2 of the Camden Local Plan 2017.
19	Number of apart-hotel bedrooms The development hereby permitted shall not comprise more than 80 apart hotel bedrooms upon completion and shall be delivered in accordance with the approved plans set out in Condition 2 of this planning permission. Reason: In order to ensure that the amenities of the surrounding area are protected in accordance with policies A1, A4 and D1 of the London Borough of Camden Local Plan 2017.
20	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 2021.
21	SuDS: Construction in accordance with details The sustainable drainage system as approved (Sustainable Drainage Strategy (28/11/2025), Proposed SuDS Strategy (13/02/2026), and updated SuDS Proforma) shall be installed as part of the development to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water and to achieve a maximum runoff rate of 11.1 l/s. The system shall include 30.8m³ blue/green roofs as stated in the approved drawings, with evidence of a minimum 150mm substrate, and shall be thereafter retained and maintained in accordance with the approved maintenance plan. The name of the management company responsible for maintenance should be provided. A site-specific Flood Risk Assessment shall be provided. Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.
22	Circular Economy Statement: Delivered in accordance with details. The Circular Economy Statement as approved (Sustainability Statement ref. 35445-HML-XX-XX-RP-V-790002) shall be delivered to achieve at least 95% reuse/recycling/recovery of construction and demolition waste and 95% beneficial use of excavation waste. A minimum of 20% of the total value of materials should derive from recycled and reused content. Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the London Plan 2021.
23	Air Source Heat Pump with Active Cooling (Non-residential) Prior to commencement of above ground works, excluding demolition, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more), the refrigerants used in the system is of global warming potential at or lower than 675, SEER of at least 5.1, and associated equipment to be installed on the building, shall have be submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved

	renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter. Reason: To ensure the development provides adequate on-site renewable energy facilities and reduces the impact of urban overheating, including application of the cooling hierarchy in accordance with policy CC1 and CC2 of the London Borough of Camden Local Plan 2017.
24	Historic Plaque Prior to demolition of the building, the removal and storage of the Performing Right Society for Music plaque on the building which records that Spandau Ballet first performed there on 5 December 1979, and prior to first use of the building, display of the plaque on the replacement building at 4 Great Queen Street. Reason: To safeguard the historic interest of the site in accordance with policy D2 of the London Borough of Camden Local Plan 2017.
25	Maximising Solar PV Prior to commencement of development other than site clearance & preparation, a feasibility assessment with the aim of maximising the provision and/ or efficiency of solar photovoltaics should be submitted to the local planning authority and approved in writing. The proposals should include as a minimum predicted energy generation of photovoltaic cells (at least 22,460kwh/annum. 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.
26	Wheelchair accessible rooms Prior to first occupation of the development, there shall be the provision of 8 fully wheelchair accessible rooms, as demonstrated on the approved proposed first, second, third, fourth and fifth floor plans. Reason: To ensure that the internal layout of the building makes sufficient provision for the needs of people with disabilities in accordance with the requirements of policy D5 of the London Plan 2021 and Policy C6 of the London Borough of Camden Local Plan 2017

23. INFORMATIVES P

1	Non-Road Mobile Machinery (NRMM): Any diesel-powered non-road mobile machinery used during construction must comply with the NRMM Low Emission Zone requirements and be registered on the NRMM register.
2	Building Regulations: The development may also require approval under the Building Regulations and/or London Building Acts, including matters relating to fire safety, access, disabled access and sound insulation.
3	Highway licences: This permission does not authorise use of the public highway. Separate licences are required for hoardings, road closures, parking suspensions and similar activities. Where a Construction Management Plan is required, licences will not be issued until the CMP has been approved.
4	Construction hours and Camden Minimum Requirements: Construction works should comply with Camden's Minimum Requirements. Noisy works are restricted to 08:00–18:00 Monday to Friday and 08:00–13:00 Saturday, with no working on Sundays or Public Holidays unless prior approval is obtained.
5	Section 106 obligations: The development is subject to a separate legal agreement with the Council. Information relating to the discharge of planning obligations should be submitted to the Planning Obligations Officer.
6	You are reminded that filled refuse sacks shall not be deposited on the public footpath, or forecourt area until within half an hour of usual collection times. For further information please contact the Council's Environment Services (Rubbish Collection) on 020 7974 6914/5. or on the website http://www.camden.gov.uk/ccm/content/contacts/council-
7	Community Infrastructure Levy (CIL): The development may be liable for the Mayor of London's CIL and Camden CIL. Liability notices, commencement notices and payments must comply with CIL procedures to avoid surcharges.
8	Hotel bedroom noise: Hotel bedrooms should be designed to achieve the internal noise criteria set out in BS8233:2014.
9	Biodiversity Net Gain (BNG) – General: Planning permission is subject to the statutory Biodiversity Gain Condition unless exempt. Based on the submitted information, the development qualifies for an exemption from requiring a Biodiversity Gain Plan.
10	Biodiversity Net Gain (BNG) Informative: The following are provided for information and may not apply to this permission: 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.

	4. The permission is exempt because of one or more of the reasons below: - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024. - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
11	Biodiversity Net Gain (BNG) Informative (3/3): + Irreplaceable habitat: If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits. + The effect of section 73(2D) of the Town & Country Planning Act 1990 If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP. + Phased development In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.
12	Archaeology: GLAAS advises that archaeological works required under the Written Scheme of Investigation may include geotechnical monitoring and archaeological field evaluation (including trial trenching) to assess the presence, extent and significance of archaeological remains.

13	Works associated with the demolition which may impact shared party walls with 5 Great Queen Street and 60 Parker Street may require separate listed building consent.
14	The applicant should note and consider where feasible, that Thames Water currently offers incentive payments for the installation of rainwater harvesting or greywater recycling systems. Further information is available on the Thames Water Developer Services webpage under "Charges". Charges Developer services Thames Water.

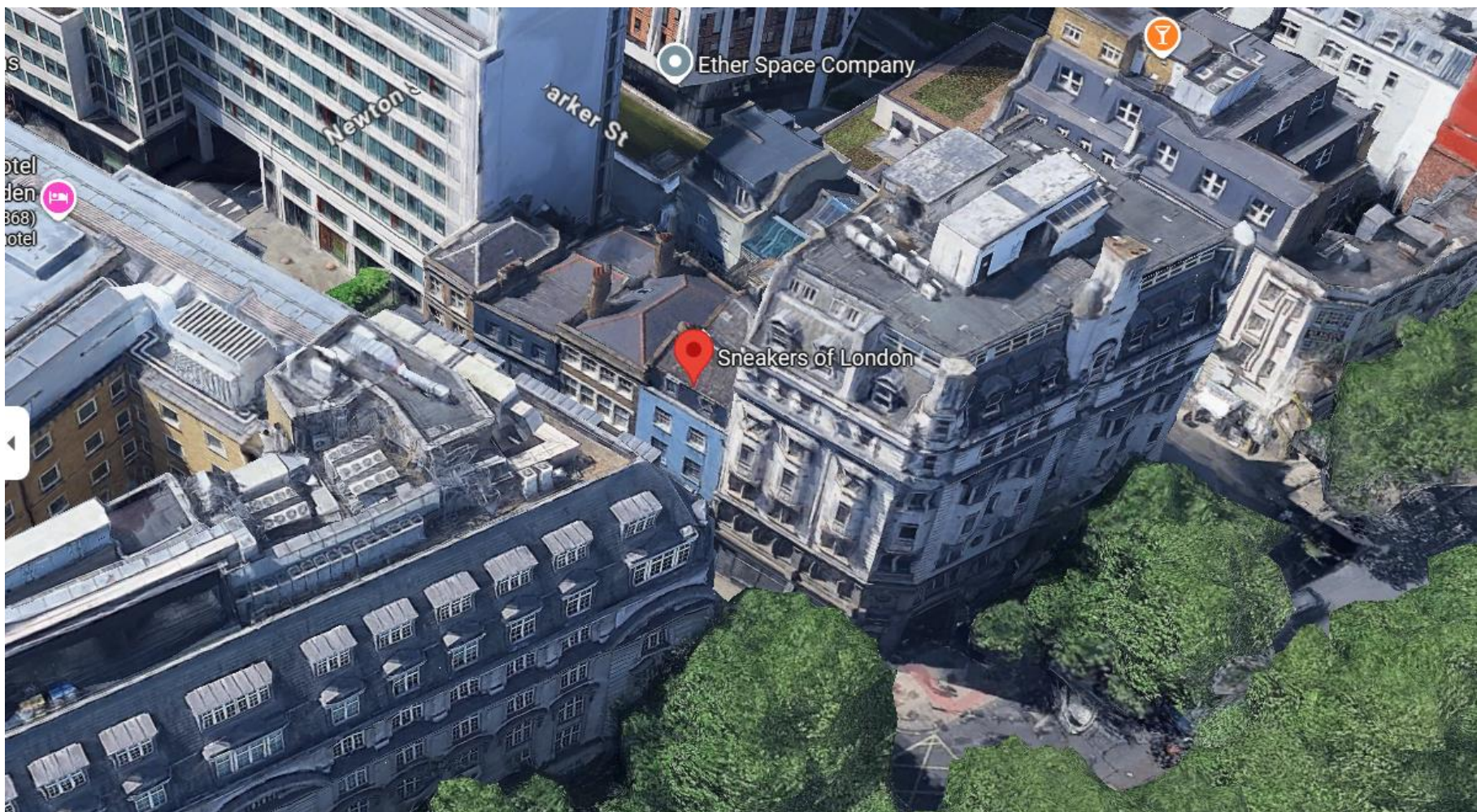
Planning Committee

30th July 2026

2025/5575/P

Kingsway House,
99-103 Kingsway & 4 Great Queen Street
London
WC2B 5DJ, WC2B 6QU, WC2B 6QX





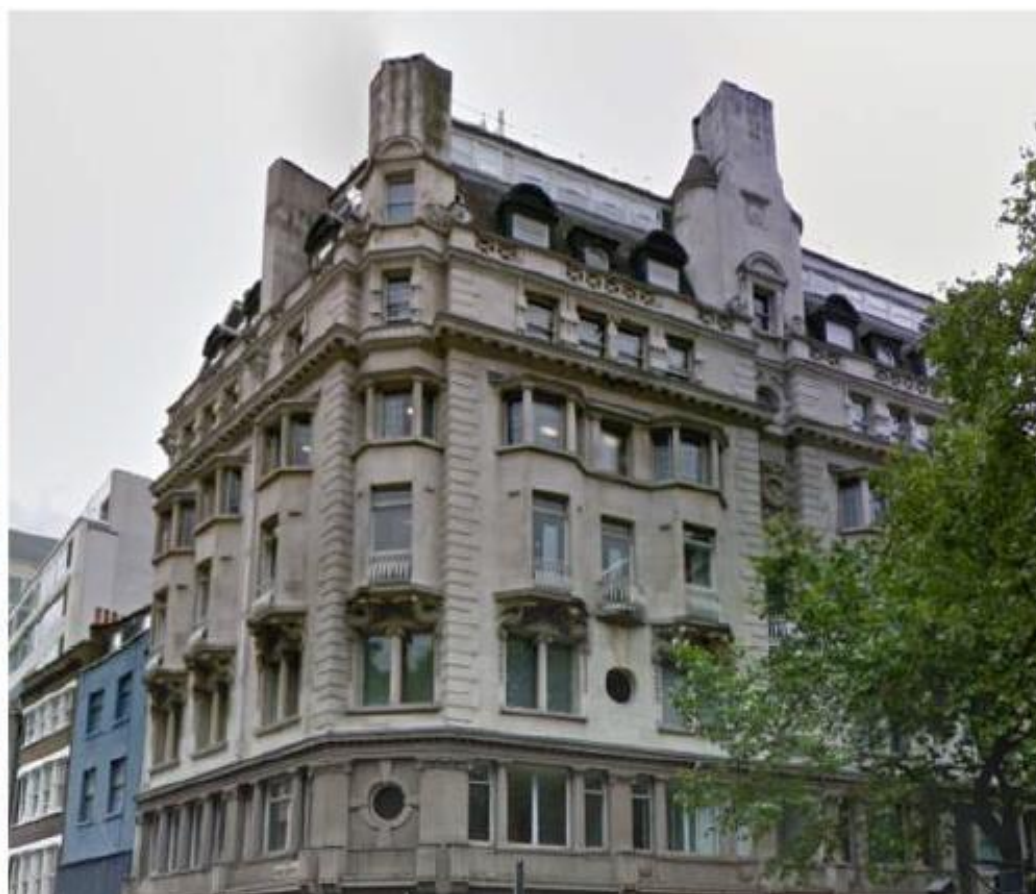
Conservation Area

Local List

Listed Building

I
II
II*















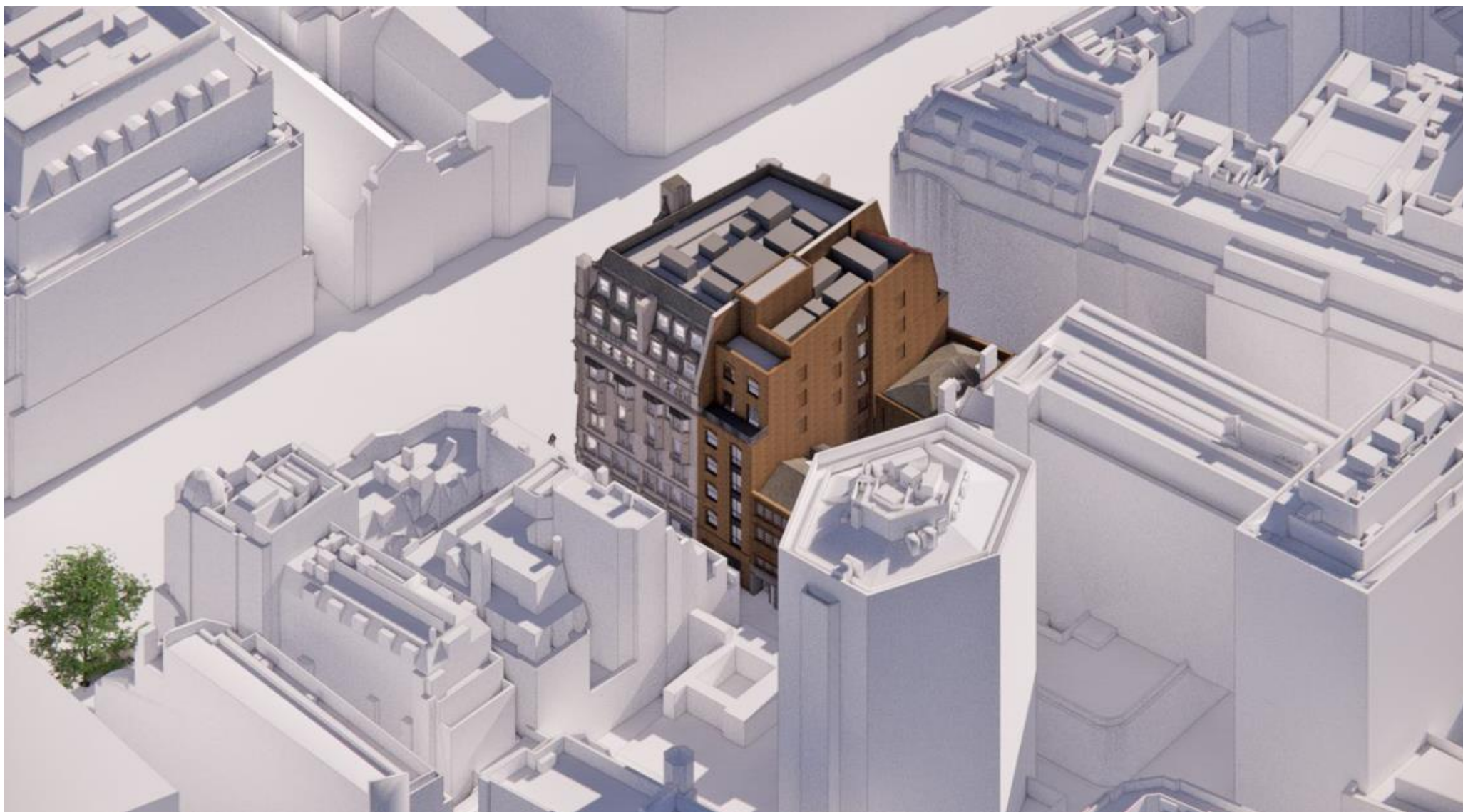




















Proposed plans and drawings overleaf

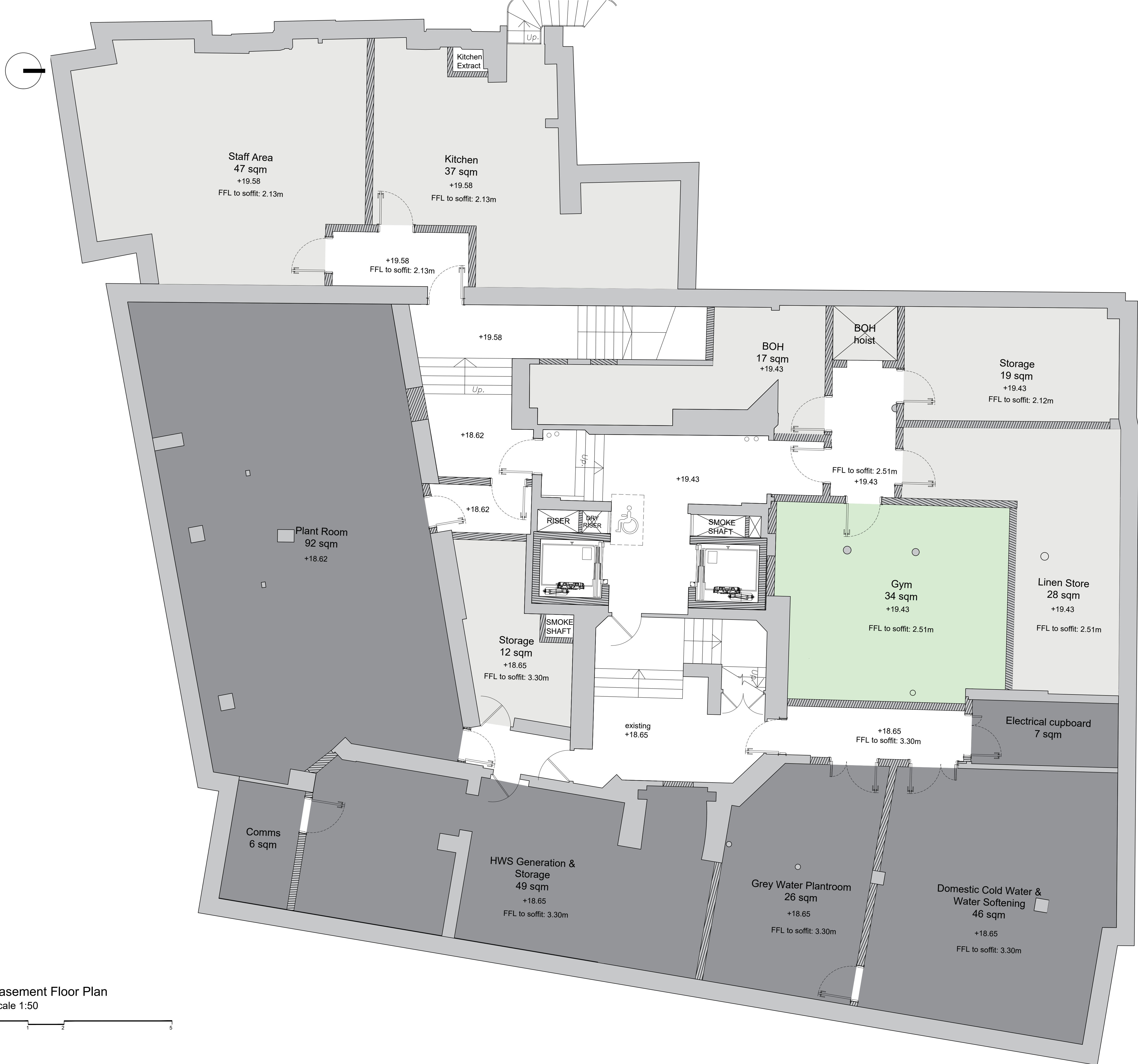


Site Location
Scale 1:250@A1:500@A3

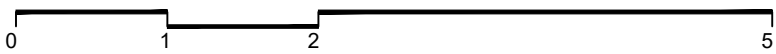
Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

P1	First issue for planning	28.11.25	MB	PW
rev	amendments	date	by	chk
studio moren		57d jamestown road london nw1 7db UK		
studio moren Ltd architecture urban design interior design creative media www.studiomoren.co.uk studio@studiomoren.co.uk		t: 020 7267 4440		
project		99-103 Kingsway 4 Great Queen Street		
client		GMS Estates		
drawing title		Proposed Site Location Plan		
drawing status		PLANNING		
scale	date	drawn by		
1:250@A1	28.11.25	MB		
1:500@A3				
job no.	drawing no.	revision		
2102	A-100-001	P1		



Basement Floor Plan
Scale 1:50

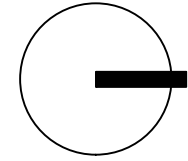


Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

- Beyond Suite
20-25sqm
- Beyond Balcony
Suite
20-25sqm
- Beyond Suite
28-35sqm
- Beyond Suite
38-45sqm
- Beyond Balcony Suite
(Accessible Room)
38-45sqm
- Hotel
FOH
- Hotel
BOH
- Plant
- Commercial
FOH

P1 - First issue for Planning	28.11.25	MB	PW
rev	amendments	date	by
studio moren	57d jamestown road london nw1 7db UK		
studio moren Ltd architecture urban design interior design creative media www.studiomoren.co.uk studio@studiomoren.co.uk			t: 020 7267 4440
architecture			
project	99-103 Kingsway 4 Great Queen Street		
client	GMS Estates		
drawing title	Basement Floor Plan		
drawing status			
scale	date	drawn by	
1:50 @ A1	28.11.25	MB	
1:100 @ A3			
job no.	drawing no.	revision	
2102	A-100-099	P1	



G R E A T Q U E E N S T R E E T

P A R K E R S T R E E T

Ground Floor Plan
Scale 1:50

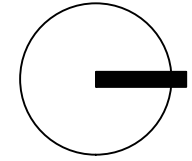


Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

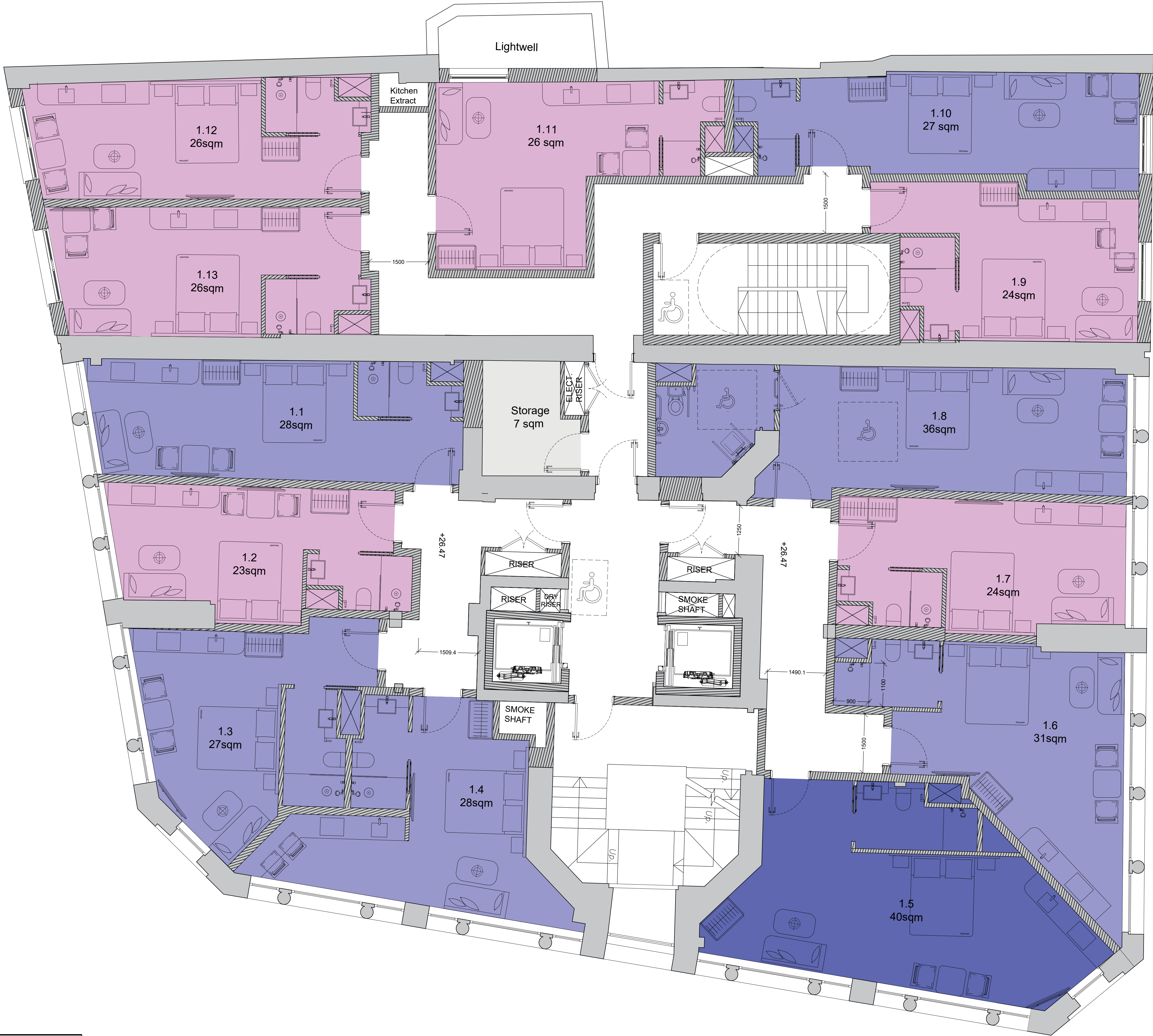
- Beyond Suite 20-25sqm
- Beyond Balcony Suite 20-25sqm
- Beyond Suite 28-35sqm
- Beyond Suite 38-45sqm
- Beyond Balcony Suite (Accessible Room) 38-45sqm
- Hotel FOH
- Hotel BOH
- Plant
- Commercial FOH

P1	First issue for Planning	28.11.25	MB	PW
rev	amendments	date	by	chk
studio moren		57d jamestown road london nw1 7db UK		
studio moren Ltd architecture urban design interior design creative media www.studiomoren.co.uk studio@studiomoren.co.uk		t: 020 7267 4440		
project 99-103 Kingsway 4 Great Queen Street		client GMS Estates		
drawing title Ground Floor Plan		drawing status		
scale 1:50 @ A1 1:100 @ A3		date 28.11.25	drawn by MB	revision
job no. 2102	drawing no. A-100-100	P1		



G R E A T Q U E E N S T R E E T

P A R K E R S T R E E T



First Floor Plan
Scale 1:50

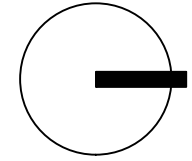


Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

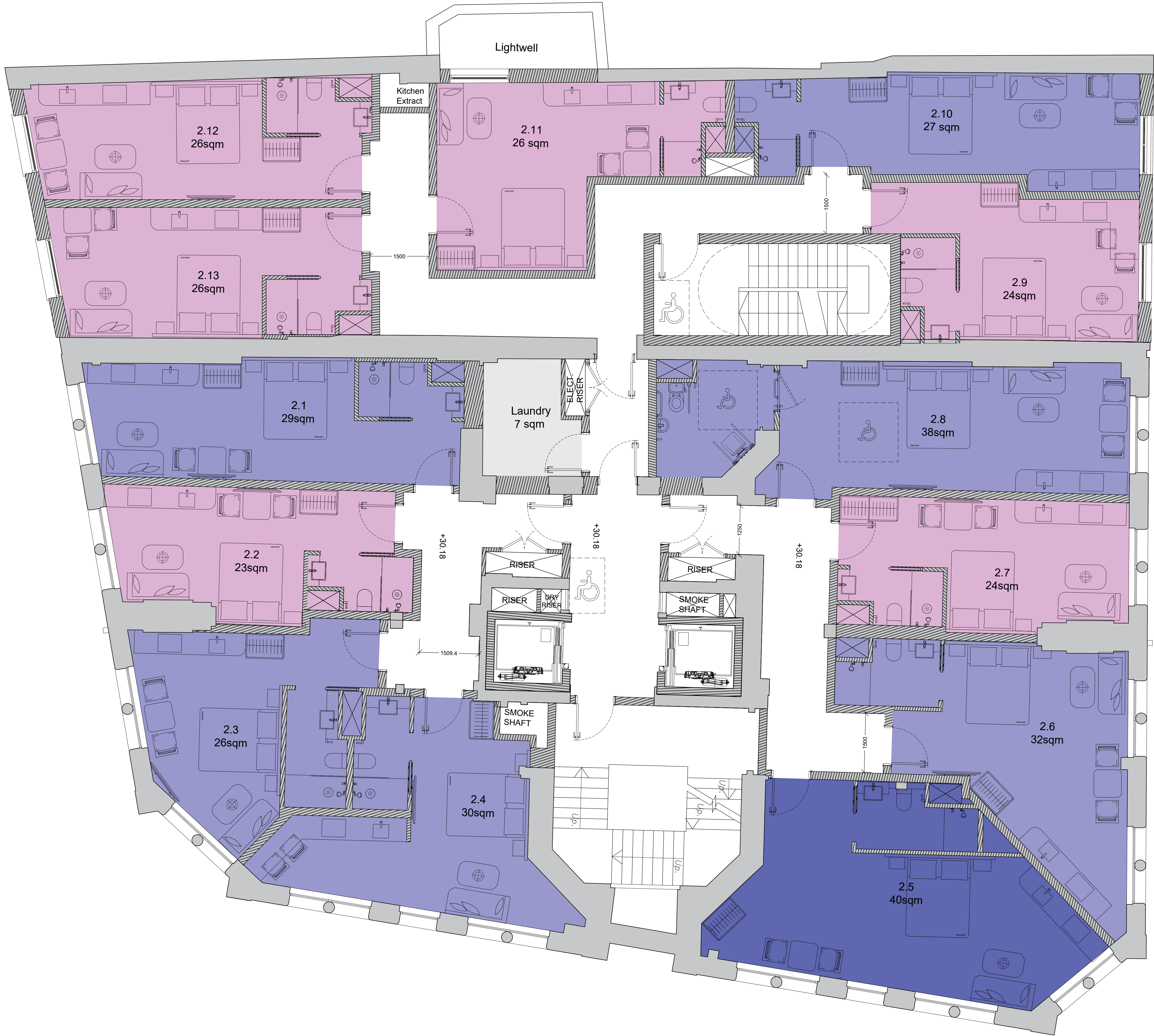
- Beyond Suite 20-25sqm
- Beyond Suite 26-35sqm
- Beyond Suite 36-45sqm
- Beyond Balcony Suite (Accessible Room) 38-45sqm
- Hotel FOH
- Hotel BOH
- Plant
- Commercial FOH

P1	First issue for Planning	28.11.25	MB	PW
rev	amendments	date	by	chk
studio moren		57d jamestown road london nw1 7db UK		
studio moren Ltd architecture urban design interior design creative media www.studiomoren.co.uk studio@studiomoren.co.uk architecture		t: 020 7267 4440		
project 99-103 Kingsway 4 Great Queen Street				
client GMS Estates				
drawing title First Floor Plan				
drawing status PLANNING				
scale 1:50 @ A1 1:100 @ A3	date 28.11.25	drawn by MB		
job no. 2102	drawing no. A-100-101	revision P1		



G R E A T Q U E E N S T R E E T

P A R K E R S T R E E T



Second Floor Plan
Scale 1:50



Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

- Beyond Suite 20-25sqm
- Beyond Balcony Suite 20-25sqm
- Beyond Suite 26-35sqm
- Beyond Suite 36-45sqm
- Beyond Balcony Suite (Accessible Room) 38-45sqm
- Hotel FOH
- Hotel BOH
- Plant
- Commercial FOH

P1 First issue for Planning	28.11.25	MB	IPW
rev	amendments	date	by

studio moren
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk
architecture

57d
jamestown road
london nw1 7db
UK

t: 020 7267 4440

project
99-103 Kingsway
4 Great Queen Street
client
GMS Estates

drawing title
Second Floor Plan

drawing status		
scale	date	drawn by
1:50 @ A1	28.11.25	MB
1:100 @ A3		
job no.	drawing no.	revision
2102	A-100-102	P1

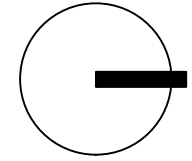
The graph shows a step function $f(x)$ on the interval $[0, 5]$. The function is defined as follows: $f(x) = 1$ for $x \in [0, 1]$, $f(x) = 0$ for $x \in (1, 2)$, and $f(x) = 1$ for $x \in [2, 5]$. The x-axis is labeled with 0, 1, 2, and 5. The y-axis has a tick mark at 1.



NOTES

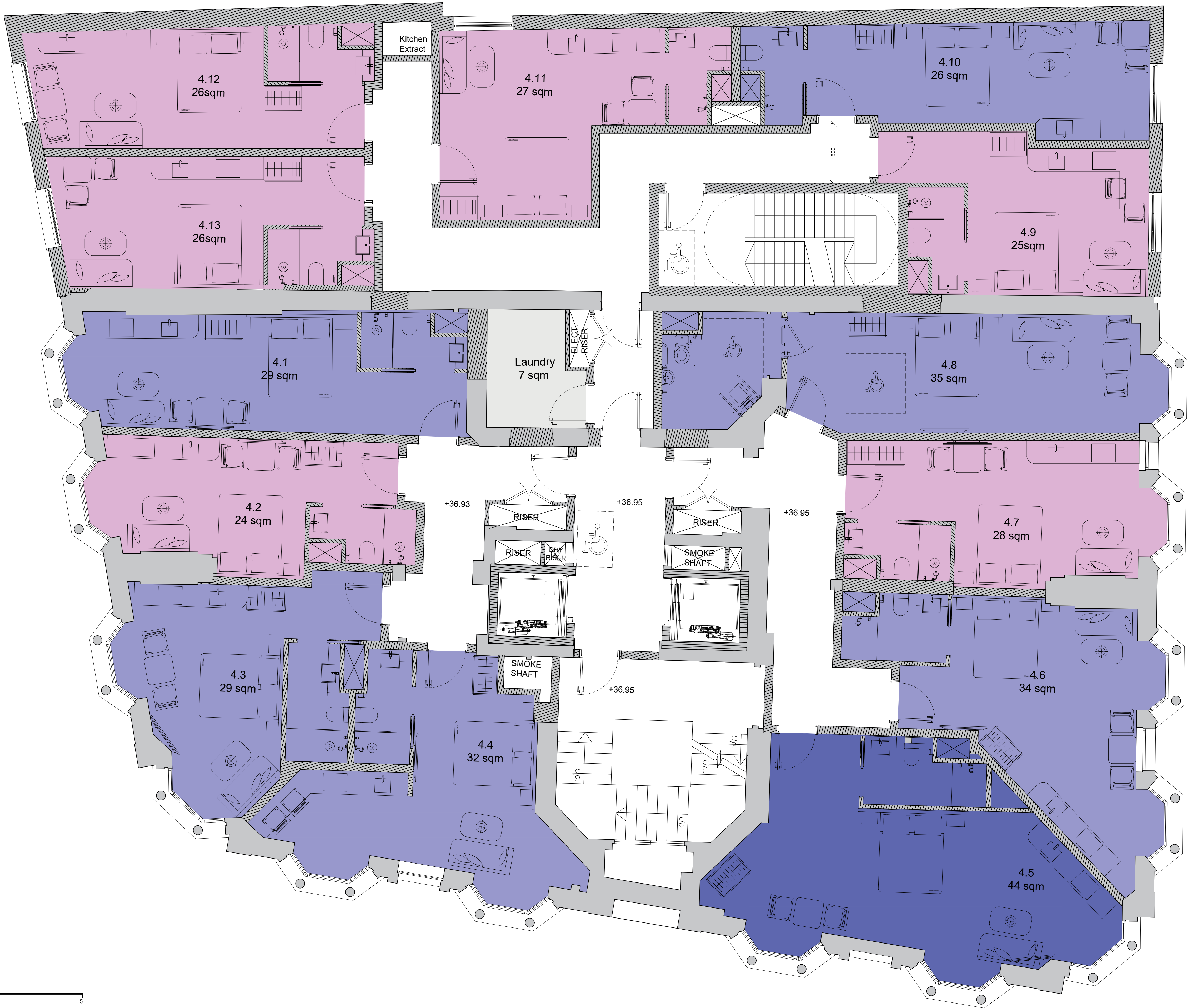
- | | |
|---|---|
|  | Beyond Suite
20-25sqm |
|  | Beyond Balcony
Suite
20-25sqm |
|  | Beyond Suite
28-35sqm |
|  | Beyond Suite
38-45sqm |
|  | Beyond Balcony Suite
(Accessible Room)
38-45sqm |
|  | Hotel
FOH |
|  | Hotel
BOH |
|  | Plant |
|  | Commercial
FOH |

P1	First Issue for Planning	28.11.25	MB	PW
rev amendments		date	by	chk
 studio moren Ltd architecture urban design interior design creative media www.studiomoren.co.uk studio@studiomoren.co.uk architecte		57d jamestown road london nw11 7db UK t: 020 7267 4444		
project				
99-103 Kingsway				
4 Great Queen Street				
client				
GMS Estates				
drawing title				
Third Floor Plan				
drawing status				
PLANNING				
scale		date	drawn by	
1:50 @ A1		28.11.25	MB	
1:100 @ A3				
job no.		drawing no.	revision	
2102		A-100-103	P1	



GREAT QUEEN STREET

PARKER STREET



Fourth Floor Plan
Scale 1:50

Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

- Beyond Suite 20-25sqm
- Beyond Balcony Suite 20-25sqm
- Beyond Suite 28-35sqm
- Beyond Suite 38-45sqm
- Beyond Balcony Suite (Accessible Room) 38-45sqm
- Hotel FOH
- Hotel BOH
- Plant
- Commercial FOH

P1 First issue for Planning	28.11.25	MB	PW
rev	amendments	date	by

studio moren
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk
architecture

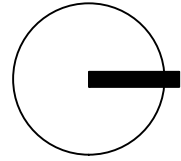
57d
jamestown road
london nw1 7db
UK

t: 020 7267 4440

project
99-103 Kingsway
4 Great Queen Street
client
GMS Estates

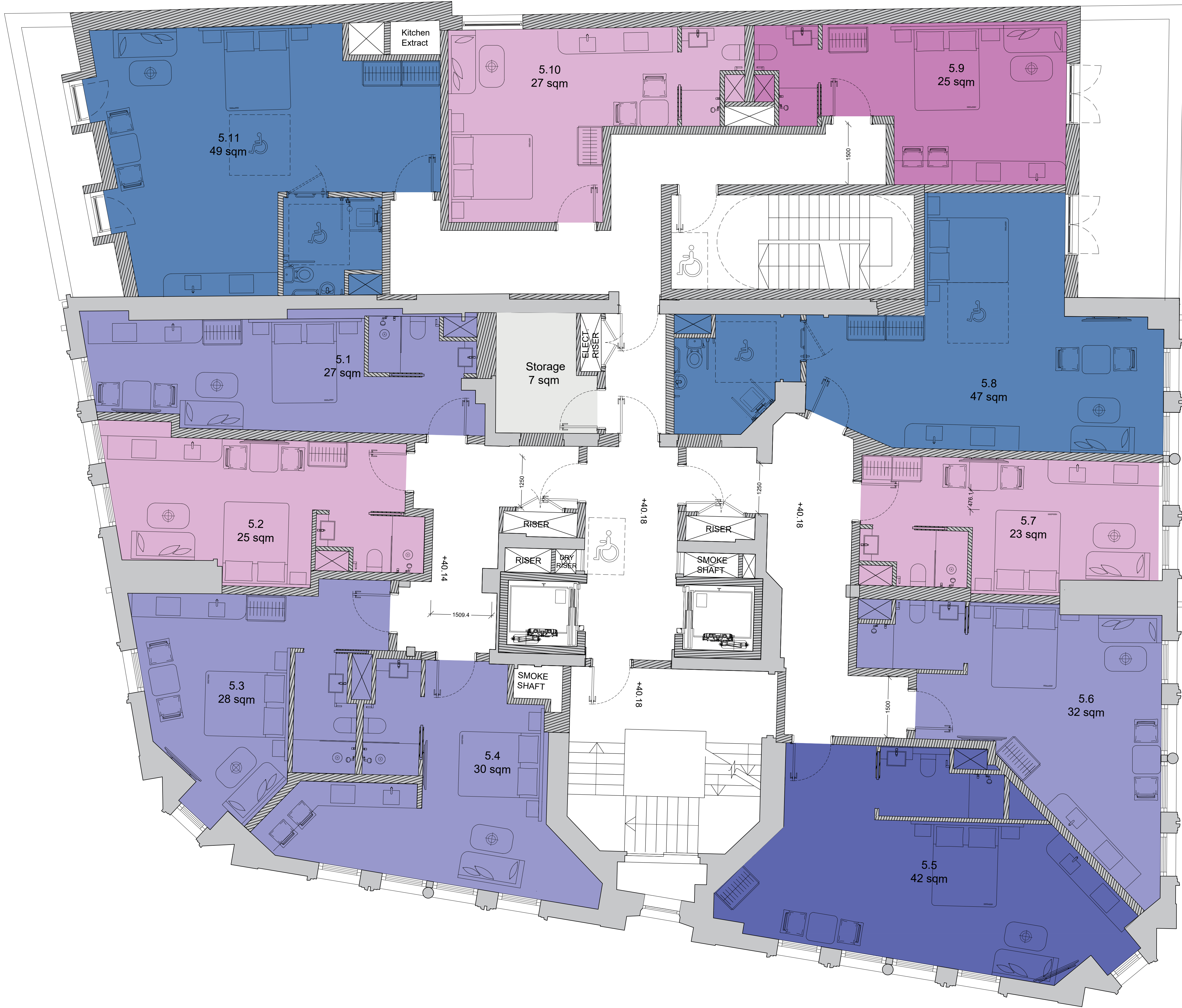
drawing title
Fourth Floor Plan

drawing status	PLANNING		
scale	date	drawn by	
1:50 @ A1	28.11.25	MB	
1:100 @ A3			
job no.	drawing no.	revision	
2102	A-100-104	P1	



G R E A T Q U E E N S T R E E T

P A R K E R S T R E E T



Fifth Floor Plan
Scale 1:50



Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

- Beyond Suite 20-25sqm
- Beyond Balcony Suite 20-25sqm
- Beyond Suite 28-35sqm
- Beyond Suite 38-45sqm
- Beyond Balcony Suite (Accessible Room) 38-45sqm
- Hotel FOH
- Hotel BOH
- Plant
- Commercial FOH

P1 First issue for Planning	28.11.25	MB	PW
rev	amendments	date	by

studio moren
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk
architecture

57d
jamestown road
london nw1 7db
UK

t: 020 7267 4440

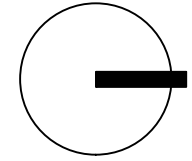
project
99-103 Kingsway
4 Great Queen Street
client
GMS Estates

drawing title
Fifth Floor Plan

drawing status

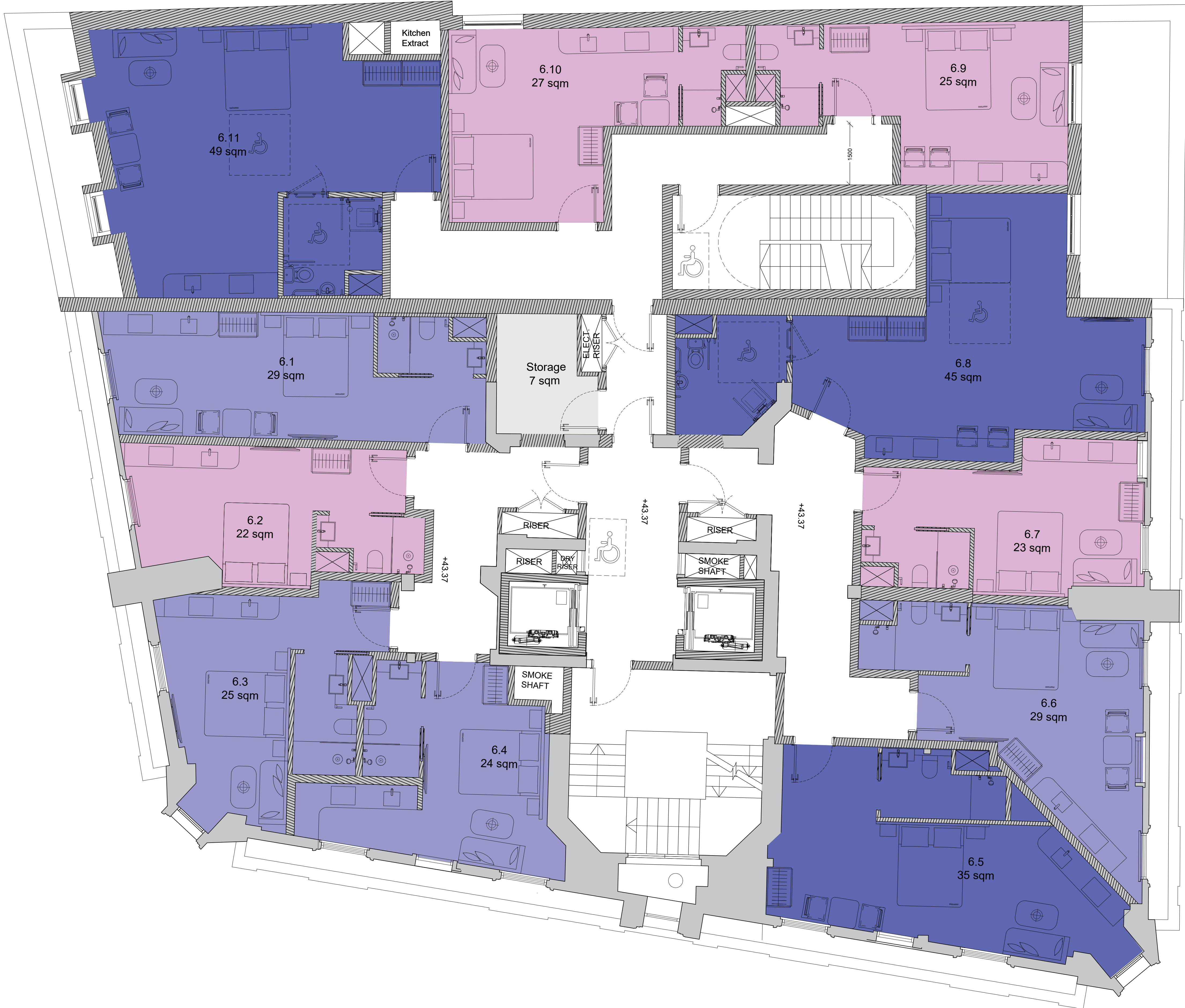
PLANNING

scale	date	drawn by
1:50 @ A1	28.11.25	MB
1:100 @ A3		
job no.	drawing no.	revision
2102	A-100-105	P1



G R E A T Q U E E N S T R E E T

P A R K E R S T R E E T



Sixth Floor Plan
Scale 1:50



Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

- Beyond Suite 20-25sqm
- Beyond Balcony Suite 20-25sqm
- Beyond Suite 28-35sqm
- Beyond Suite 38-45sqm
- Beyond Balcony Suite (Accessible Room) 38-45sqm
- Hotel FOH
- Hotel BOH
- Plant
- Commercial FOH

P1 First Issue for Planning	28.11.25	MB	PW
rev	amendments	date	by

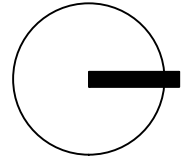
studio moren
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk
architecture

project
99-103 Kingsway
4 Great Queen Street
client
GMS Estates

drawing title
Sixth Floor Plan

drawing status
PLANNING

scale	date	drawn by
1:50 @ A1	28.11.25	MB
1:100 @ A3		
job no.	drawing no.	revision
2102	A-100-106	P1



G R E A T Q U E E N S T R E E T

P A R K E R S T R E E T

Seventh Floor Plan
Scale 1:50



Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

- Beyond Suite 20-25sqm
- Beyond Balcony Suite 20-25sqm
- Beyond Suite 28-35sqm
- Beyond Suite 38-45sqm
- Beyond Balcony Suite (Accessible Room) 38-45sqm
- Hotel FOH
- Hotel BOH
- Plant
- Commercial FOH

P1	First issue for Planning	28.11.25	MB	PW
rev	amendments	date	by	chk

studio moren
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk
architecture

57d
jamestown road
london nw1 7db
UK

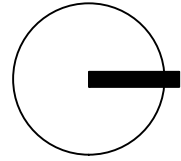
t: 020 7267 4440

project
99-103 Kingsway
4 Great Queen Street
client
GMS Estates

drawing title
Seventh Floor Plan

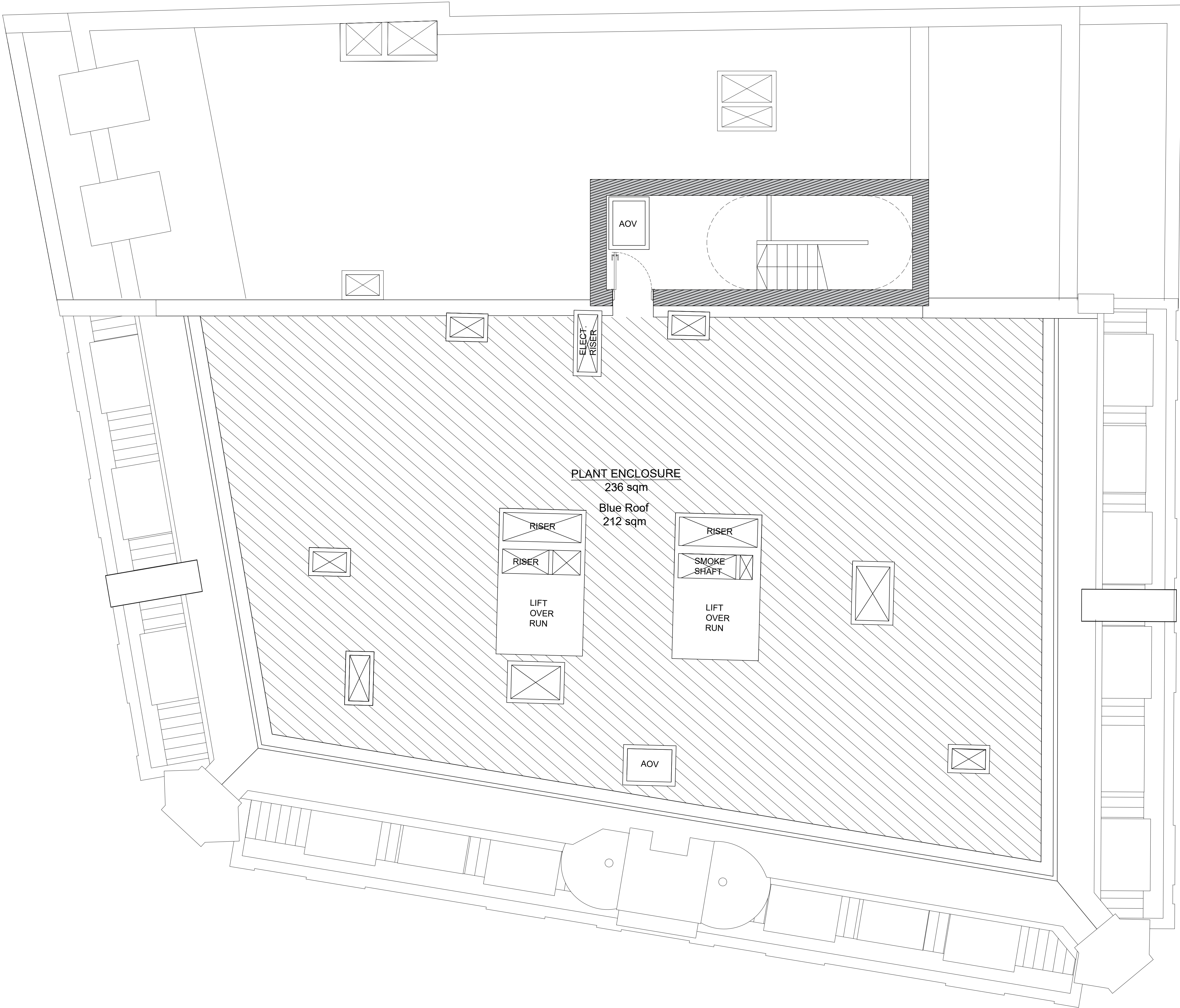
drawing status
PLANNING

scale	date	drawn by
1:50 @ A1	28.11.25	MB
1:100 @ A3		
job no.	drawing no.	revision
2102	A-100-107	P1



G R E A T Q U E E N S T R E E T

P A R K E R S T R E E T



Roof Plan
Scale 1:50



Copyright: All rights reserved. This drawing must not be reproduced without permission.
Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.
All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.
Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.
Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES

- Beyond Suite 20-25sqm
- Beyond Balcony Suite 20-25sqm
- Beyond Suite 28-35sqm
- Beyond Suite 38-45sqm
- Beyond Balcony Suite (Accessible Room) 38-45sqm
- Hotel FOH
- Hotel BOH
- Plant
- Commercial FOH

P1	First Issue for Planning	28.11.25	MB	PW
rev	amendments	date	by	chk

studio moren
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk
architecture

57d
jamestown road
london nw1 7db
UK

t: 020 7267 4440

project
99-103 Kingsway
4 Great Queen Street
client
GMS Estates

drawing title
Roof Plan

drawing status
PLANNING

scale	date	drawn by
1:50 @ A1	28.11.25	MB
1:100 @ A3		
job no.	drawing no.	revision
2102	A-100-108	P1

Copyright: All rights reserved. This drawing must not be reproduced without permission.

Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.

All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.

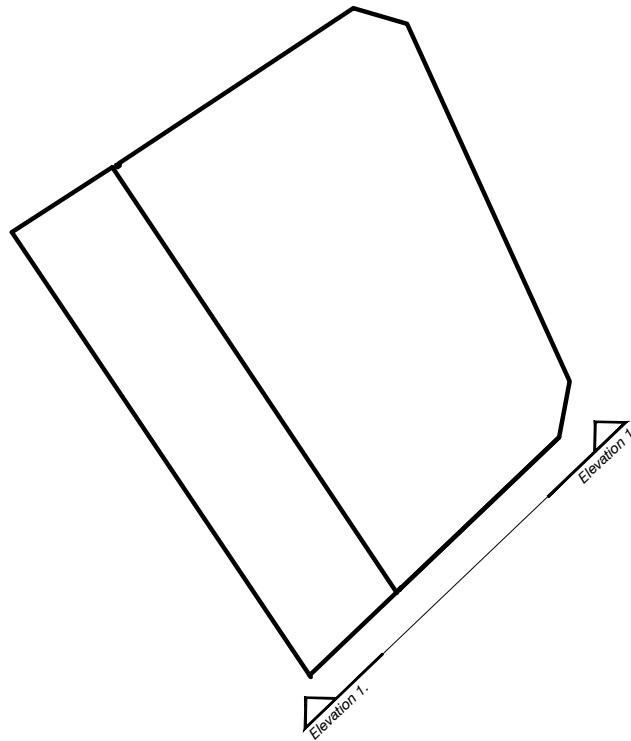
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.

Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.

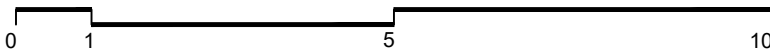
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.

Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES



01 Elevation 01



P1	First Issue for Planning	28.11.25	MB	PW
rev	amendments	date	by	chk

**studio
moren**
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk

57d
jamestown road
london nw1 7db
UK

t: 020 7267 4440

project
99-103 Kingsway
4 Great Queen Street

client
GMS Estates

drawing title
Proposed
Elevations Sheet 1of 3

drawing status
PLANNING

scale	date	drawn by
1:100 @ A1	28.11.25	MB
1:200 @ A3		
job no.	drawing no.	revision
2102	A-100-150	P1

Copyright: All rights reserved. This drawing must not be reproduced without permission.

Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.

All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.

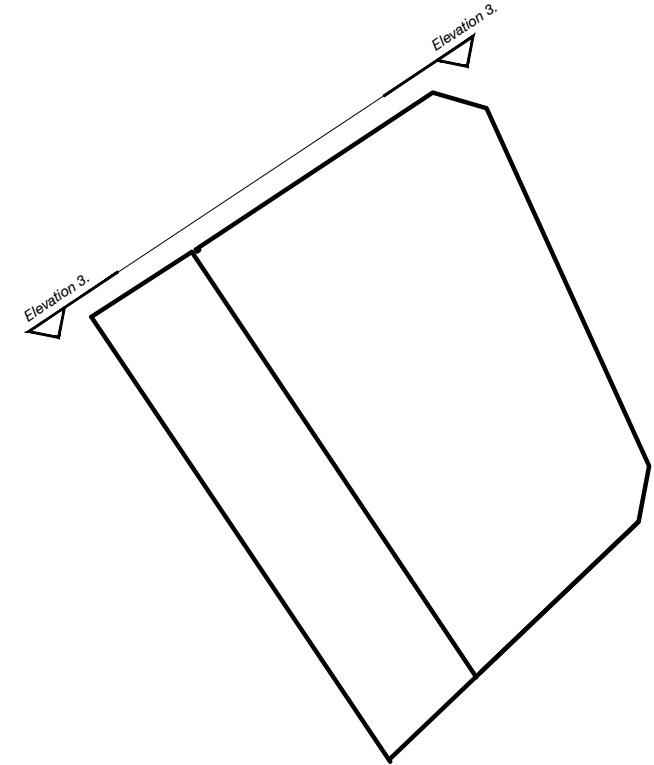
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.

Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.

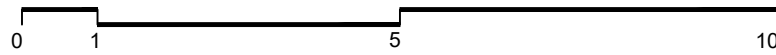
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.

Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES



03 Elevation 03



P1	First Issue for Planning	28.11.25	MB	IPW
rev	amendments	date	by	chk

studio moren
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk
architecture

57d
jamestown road
london nw1 7db
UK

t: 020 7267 4440

project
99-103 Kingsway
4 Great Queen Street

client
GMS Estates

drawing title
Proposed
Elevations Sheet 2 of 3

drawing status

scale	date	drawn by
1:100 @ A1	28.11.25	MB
1:200 @ A3		
job no.	drawing no.	revision
2102	A-100-151	P1

Copyright: All rights reserved. This drawing must not be reproduced without permission.

Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.

All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.

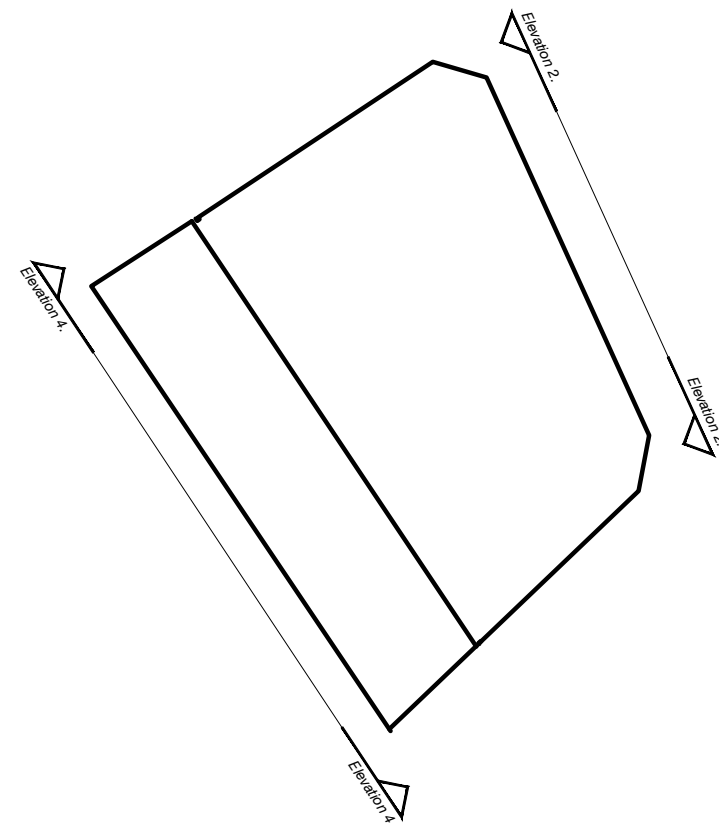
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.

Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.

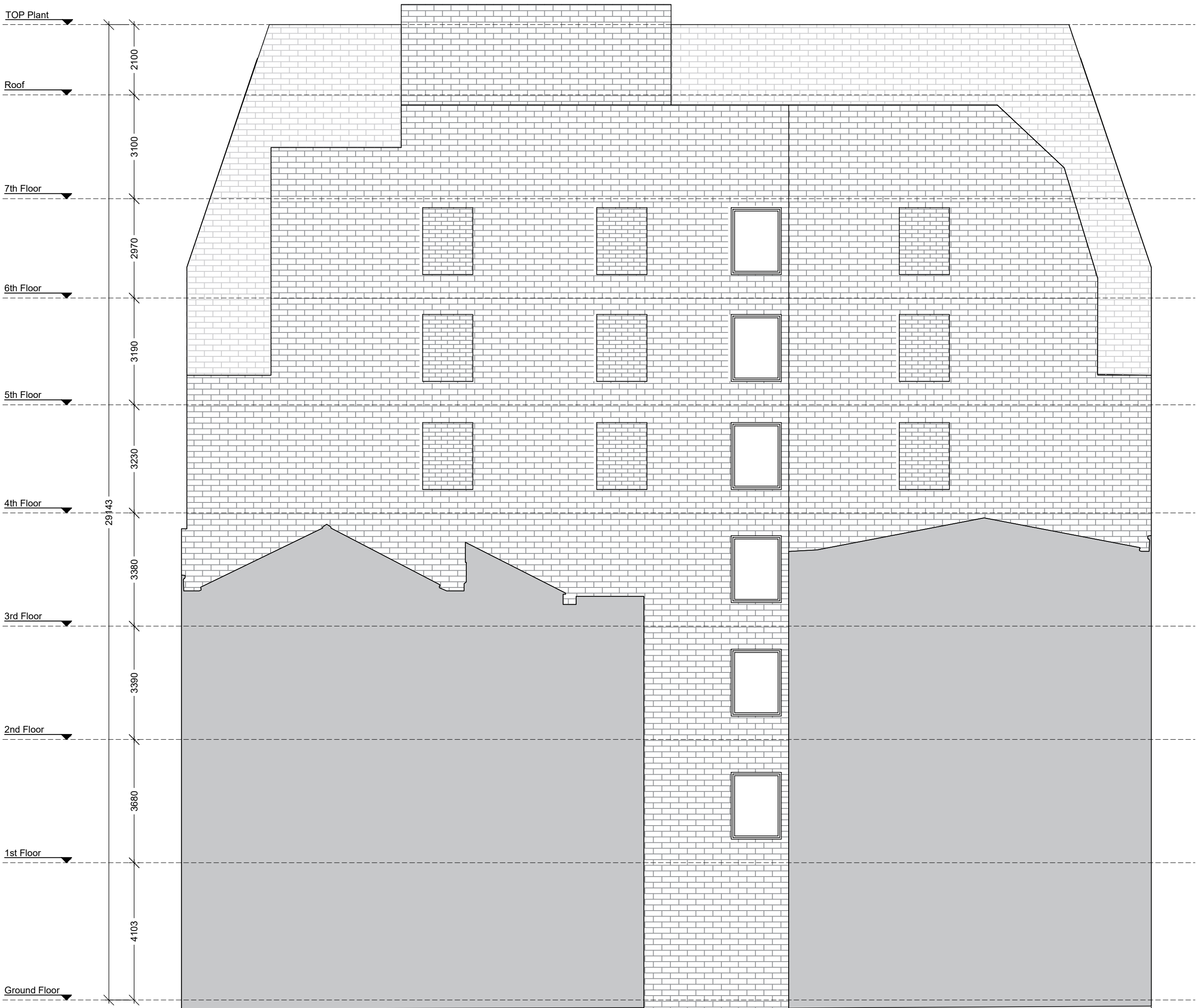
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.

Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

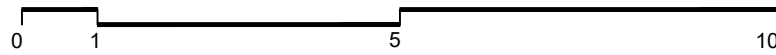
NOTES



02 Elevation 02



04 Elevation 04



P1	First issue for Planning	28.11.25	MB	PW
rev	amendments	date	by	chk

studio moren
studio moren Ltd
architecture urban design
interior design creative media
www.studiomoren.co.uk
studio@studiomoren.co.uk
architecture

57d
jamestown road
london nw1 7db
UK

t: 020 7267 4440

project
99-103 Kingsway
4 Great Queen Street

client
GMS Estates

drawing title
Proposed
Elevations Sheet 3 of 3

drawing status
PLANNING

scale	date	drawn by
1:100 @ A1	28.11.25	MB
1:200 @ A3		
job no.	drawing no.	revision
2102	A-100-152	P1

Copyright: All rights reserved. This drawing must not be reproduced without permission.

Only the original drawing should be relied upon. Contractors, sub-contractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.

All shop drawings to be submitted to the architect / interior designer for comment prior to fabrication.

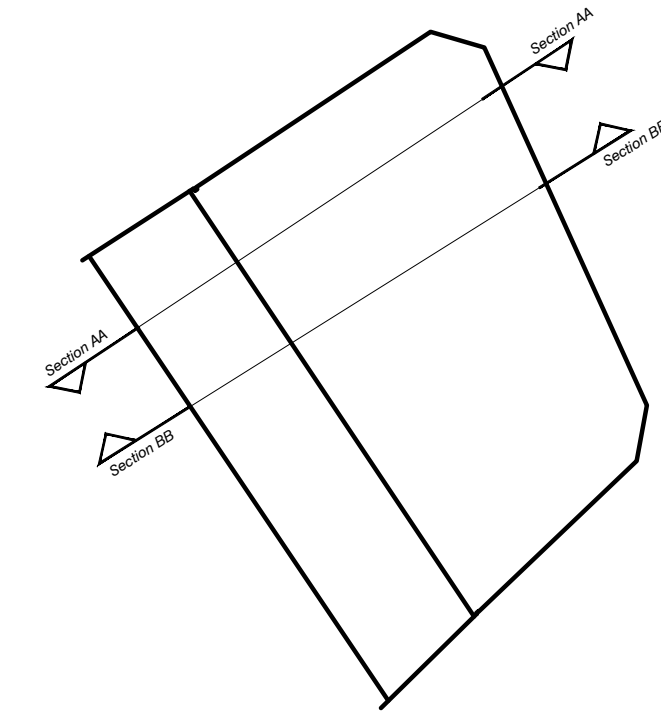
This drawing is to be read in conjunction with the architect's / interior designer's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect / interior designer.

Do not scale from this drawing. Dimensions are in millimetres unless otherwise stated.

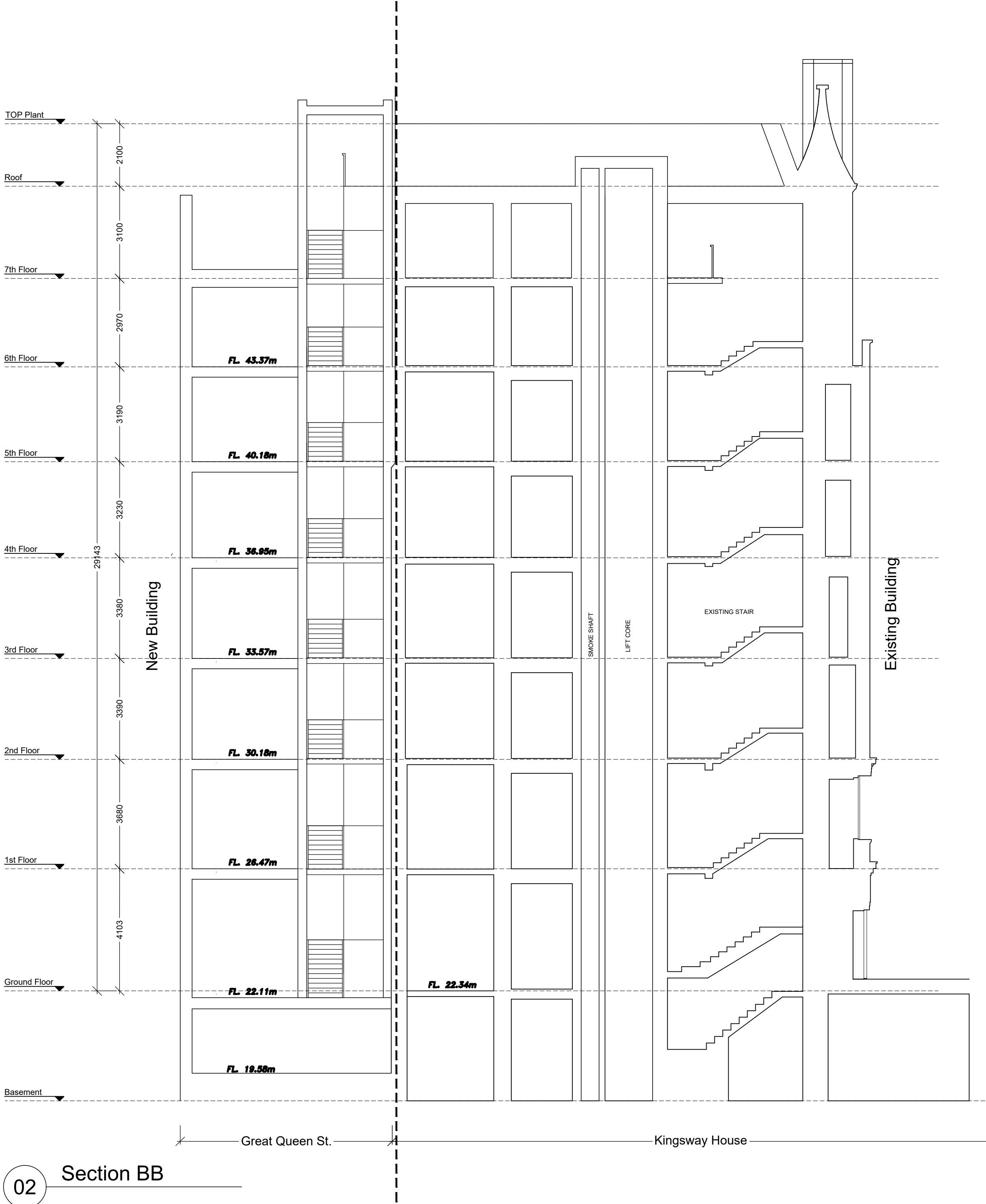
All fire related elements and items as set out within the Fire Engineers Fire Strategy Report. Fire rating of elements / components require fire certification from certified test bodies to be provided to both the Fire Engineer & Building Control for review and sign off, prior to procurement and installation.

Studio Moren Ltd will coordinate with all other consultants in relation to statutory items / elements under that consultants control. These items may be shown on Studio Moren Ltd drawings for coordination purposes, however they remain under that consultants design and control.

NOTES



01 Section AA



02 Section BB

P1	First issue for Planning	28.11.25	MB	PW
rev	amendments	date	by	chk
studio moren studio moren Ltd architecture urban design interior design creative media www.studiomoren.co.uk studio@studiomoren.co.uk architecture		57d jamestown road london nw1 7db UK t: 020 7267 4440		
project 99-103 Kingsway 4 Great Queen Street				
client GMS Estates				
drawing title Proposed Section AA and BB				
drawing status PLANNING				
scale	date	drawn by		
1:100 @ A1 1:200 @ A3	28.11.25	MB		
job no.	drawing no.	revision		
2102	A-100-153	P1		