

Address:	2 Waterhouse Square 140 Holborn London EC1N 2ST		<div style="font-size: 48pt; text-align: center;">1</div>
Application Numbers:	2023/3419/P	Officer: Christopher Smith	
Ward:	Holborn & Covent Garden		
Date Received:	04/08/2023		
<p>Proposal (planning application):</p> <p>Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) and flexible commercial/bar (Class E/sui generis) space at 2 Waterhouse Square including external alterations, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.</p>			
<p>Existing Plans and Drawings (all Rev. C01 unless specified):</p> <p>WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan WHS-ORM-2W-04-DR-A-12504 Existing General Arrangement Fourth Floor Plan WHS-ORM-2W-05-DR-A-12505 Existing General Arrangement Fifth Floor Plan WHS-ORM-2W-06-DR-A-12506 Existing General Arrangement Sixth Floor Plan WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation</p> <p>Proposed Plans and Drawings (all Rev. C01 unless specified):</p> <p>WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan WHS-ORM-2W-00-DR-A-12600 Proposed Demolition Ground Floor Plan WHS-ORM-2W-00-DR-A-12700 (Rev. C02) Proposed General Arrangement Ground Floor Plan WHS-ORM-2W-01-DR-A-12601 Proposed Demolition First Floor Plan WHS-ORM-2W-01-DR-A-12701 (Rev. C02) Proposed General Arrangement First Floor Plan WHS-ORM-2W-02-DR-A-12602 Proposed Demolition Second Floor Plan</p>			

WHS-ORM-2W-02-DR-A-12702 (Rev. C02) Proposed General Arrangement Second Floor Plan
WHS-ORM-2W-03-DR-A-12603 Proposed Demolition Third Floor Plan
WHS-ORM-2W-03-DR-A-12703 (Rev. C02) Proposed General Arrangement Third Floor Plan
WHS-ORM-2W-04-DR-A-12604 Proposed Demolition Fourth Floor Plan
WHS-ORM-2W-04-DR-A-12704 (Rev. C02) Proposed General Arrangement Fourth Floor Plan
WHS-ORM-2W-05-DR-A-12605 Proposed Demolition Fifth Floor Plan
WHS-ORM-2W-05-DR-A-12705 (Rev. C02) Proposed General Arrangement Fifth Floor Plan
WHS-ORM-2W-06-DR-A-12606 Proposed Demolition Sixth Floor Plan
WHS-ORM-2W-06-DR-A-12706 (Rev. C02) Proposed General Arrangement Sixth Floor Plan
WHS-ORM-2W-07-DR-A-12707 (Rev. C02) Proposed General Arrangement Seventh Floor Plan
WHS-ORM-2W-AA-DR-A-12140 Proposed Planning Section A-A
WHS-ORM-2W-B1-DR-A-12699 Proposed Demolition Basement 1 Plan
WHS-ORM-2W-B1-DR-A-12799 (Rev. C02) Proposed General Arrangement Basement 1 Plan
WHS-ORM-2W-BB-DR-A-12141 Proposed Planning Section B-B
WHS-ORM-2W-CC-DR-A-12142 Proposed Planning Section C-C
WHS-ORM-2W-DD-DR-A-12143 Proposed Planning Section D-D
WHS-ORM-2W-EA-DR-A-12349 Proposed Planning Bay Study 10
WHS-ORM-2W-EA-DR-A-12350 Proposed Planning Bay Study 11
WHS-ORM-2W-EA-DR-A-12351 Proposed Planning Bay Study 12
WHS-ORM-2W-EA-DR-A-12352 Proposed Planning Bay Study 13
WHS-ORM-2W-EA-DR-A-12372 Proposed Planning R7 Heritage Block East Facade
WHS-ORM-2W-EE-DR-A-12144 Proposed Planning Section E-E
WHS-ORM-2W-LG-DR-A-12698 Proposed Demolition Lower Ground Floor Plan
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WHS-ORM-2W-NO-DR-A-12330 Proposed Planning North Elevation
WHS-ORM-2W-NO-DR-A-12340 Proposed Planning Bay Study 01
WHS-ORM-2W-NO-DR-A-12341 Proposed Planning Bay Study 02
WHS-ORM-2W-NO-DR-A-12342 Proposed Planning Bay Study 03
WHS-ORM-2W-NO-DR-A-12343 Proposed Planning Bay Study 04
WHS-ORM-2W-NO-DR-A-12344 Proposed Planning Bay Study 05
WHS-ORM-2W-NO-DR-A-12345 Proposed Planning Bay Study 06
WHS-ORM-2W-NO-DR-A-12346 Proposed Planning Bay Study 07
WHS-ORM-2W-NO-DR-A-12347 Proposed Planning Bay Study 08
WHS-ORM-2W-NO-DR-A-12348 Proposed Planning Bay Study 09
WHS-ORM-2W-NO-DR-A-12371 Proposed Planning R7 Heritage Block North Facade
WHS-ORM-2W-RF-DR-A-12607 Proposed Demolition Roof Plan
WHS-ORM-2W-SO-DR-A-12332 Proposed Planning South Elevation
WHS-ORM-2W-SO-DR-A-12353 Proposed Planning Bay Study 14
WHS-ORM-2W-SO-DR-A-12370 Proposed Planning R6 Heritage Block South Facade
WHS-ORM-2W-WE-DR-A-12333 Proposed Planning West Elevation
WHS-ORM-2W-WE-DR-A-12354 Proposed Planning Bay Study 15
WHS-ORM-2W-WE-DR-A-12355 Proposed Planning Bay Study 16
WHS-ORM-2W-ZZ-DR-A-12360 Proposed Planning Entrance Elevations

Supporting Documentation:

Design and Access Statement, and Townscape Assessment (July 2023)

Planning Statement (November 2023)

Planning Report (July 2023)

Noise Impact Assessment (July 2023)

Sustainability Statement (August 2023)

Daylight, Sunlight and Overshadowing Report (July 2023)

Construction/Demolition Management Plan (July 2023)

Transport Assessment (July 2023)

Heritage Assessment (July 2023)

Statement of Community Involvement (August 2023)

Operational Waste Management Strategy (July 2023)

Drainage Strategy Report (October 2023)

Air Quality Assessment (October 2023)

Active Travel Zone Assessment Technical Note (November 2023)

RECOMMENDATION SUMMARY:

Grant conditional planning permission following:

- (i) **Completion of Section 106 Legal Agreement.**

Applicant:

Prudential Assurance Company Limited

Agent:

Gerald Eve LLP

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Application Numbers:	2023/3420/L	Officer: Christopher Smith	
Ward:	Holborn & Covent Garden		
Date Received:	04/08/2023		

Proposal (listed building consent application):

Partial demolition, refurbishment and extension of existing office building to provide commercial floorspace (Class E) and flexible commercial/bar (Class E/sui generis) space at 2 Waterhouse Square including reconfiguration of entrances and other external alterations, internal refurbishment of and alterations to the historic fabric, and other ancillary works.

Background Papers, Supporting Documents and Drawing Numbers:

Existing Plans and Drawings (all Rev. C01 unless specified):

WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan

WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan

WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan

WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan

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WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan

WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A

WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan

WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B

WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C

WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D

WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation

WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E

WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan

WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation

WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation

WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation

Proposed Plans and Drawings (all Rev. C01 unless specified):

WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan

WHS-ORM-2W-00-DR-A-12600 Proposed Demolition Ground Floor Plan

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RECOMMENDATION SUMMARY:

Grant conditional listed building consent.

Applicant:

Prudential Assurance Company Limited

Agent:

Gerald Eve LLP

ANALYSIS INFORMATION

Land Use Details:			
	<i>Use Class</i>	<i>Use Description</i>	<i>Floorspace (GIA sqm)</i>
Existing	Class E(gi) – Offices		29,226
	EXISTING TOTAL		29,226
Proposed	Class E (Retail/Offices)		29,531
	Class E (Retail/Offices)/ Sui Generis (Drinking Establishment)		322
	PROPOSED TOTAL		29,853 (+627)

Parking Details:		
	Car Parking Spaces (General)	Cycle Parking Spaces
Existing	11	36
Proposed	0 (zero)	457

OFFICERS' REPORT

Reason for Referral to Committee: The construction of a building or extension resulting in an increase of more than 500sqm of non-residential floor-space. [clause 3(ii)].

EXECUTIVE SUMMARY

- i. The application is a commercial development for partial demolition of the existing building to provide additional Class E floor space intended for use as offices and retail space and a retail/bar unit in Class E/Sui Generis use. In total, the application proposes 29,853sqm of non-residential floorspace which includes an overall floorspace uplift of 627sqm.
- ii. The proposed land uses are similar to those already on the site and in the local area and would increase the density and quality of the office uses as well as providing ground floor uses that activate surrounding streets, increasing commercial and pedestrian activity, improving safety and security on local streets and ensuring the vitality and viability of the existing commercial frontages. The existing market on Leather Lane would be respected and the site's relationship with it would be enhanced. It is not possible to provide housing on site and a financial contribution would be provided in lieu of this on-site provision.
- iii. The new building would partially demolish, refurbish and extend a recent extension of no noted architectural merit. It would be of a high quality, would respect key local views and would appropriately contrast with the listed building. It would not detract from the conservation area or the setting of the listed building. The works to the listed building would help retain the building in its optimum viable use as a commercial space and thus the low level of less than substantial harm that is created would be outweighed by these public benefits. It is therefore considered that propose development would, on balance, preserve the Grade II* listed Waterhouse Square, and would also preserve its setting and the character and appearance of the Hatton Garden Conservation Area.
- iv. The proposal would have high-quality architecture demonstrated through its well-considered composition and detailing and thus would significantly improve the experience of the urban block from the street and would enhance the public realm around the site. The design creates an open, publicly accessible, commercial ground plane with active ground floor frontages that would improve the safety and security of, and bring life to, local streets.
- v. The scheme has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight, outlook, privacy, and in terms of preventing additional noise disturbance..
- vi. The proposed development would involve the partial demolition, refurbishment and extension of the existing extension on-site. 83% of the volume of the existing extension would be retained and the development would have a substantial carbon saving across the lifetime of the development compared to

alternative refurbishment options due to its very low energy demand. The development would also be car free would make the best use of the site in an accessible location. Officers are satisfied with the proposed development in terms of sustainability and energy use.

- vii. The building phase of the proposed development would be required to adhere to a detailed construction management plan to protect the amenity of nearby residents and would also provide financial contributions towards local public realm improvements.
- viii. As such, it is recommended that planning permission and listed building consent is granted subject to conditions and a Section 106 legal agreement.

1 SITE

- 1.1 The site is formed of the northern part of Waterhouse Square at 138-142 Holborn, (also known as Holborn Bars complex) which is located between Beauchamp Street (north), Holborn (south), Leather Lane (east) and Brooke Street (west). Waterhouse Square is split into three separate buildings and the site consists of 2 Waterhouse Square only.

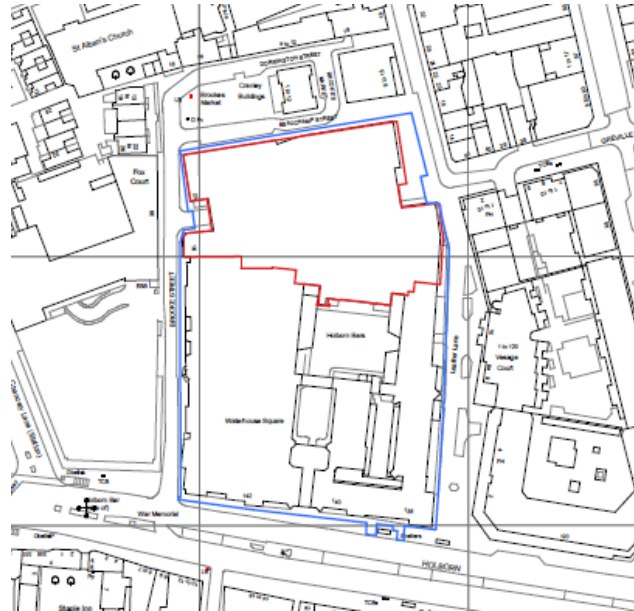


Figure 1: Application site edged in red.

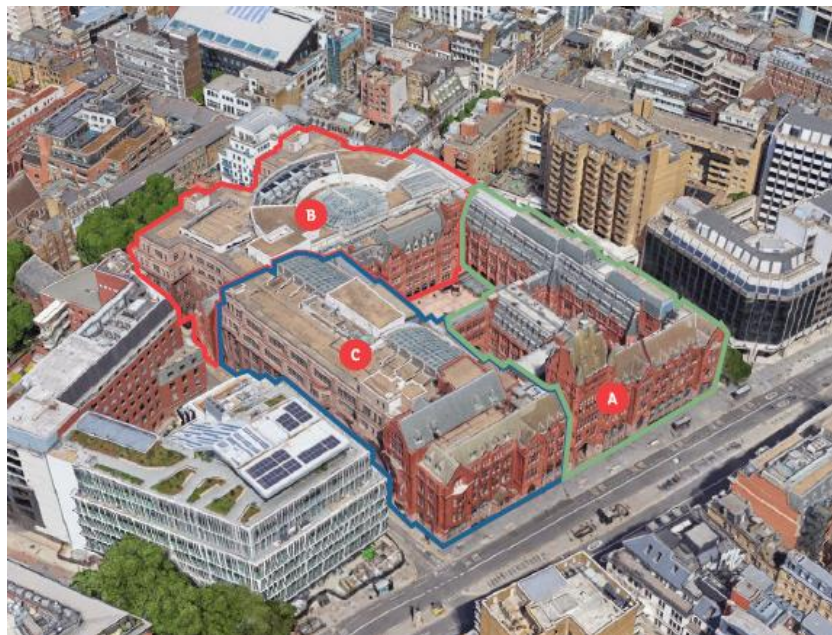


Figure 2: Application site is Block B. Blocks A and C are also part of Waterhouse Square.

- 1.2 Waterhouse Square was built in phases between 1876 and 1901 and was listed Grade II* in 1972. There have been numerous changes to the buildings over the intervening period. 2 Waterhouse Square specifically was subject to substantial demolition, extension and rebuild in 1993. It contains some original fabric but is predominately comprised of a non-original extension. The extension has no

significance in the context of the listed building and is considered to 'lack interest' by the Hatton Garden Conservation Area Appraisal and Management Strategy (2017).

- 1.3 2 Waterhouse Square is between five and seven storeys in height (max. AOD 48.2m) with a staggered form that steps back from the building frontage as the floor height increases. The building also includes a single basement level. The building was most recently in use as offices and is currently vacant.
- 1.4 The surrounding area is a mix of commercial properties at ground floor, with a mix of offices and residential accommodation on the floors above. Local character includes a mix of contemporary and historic architectural styles.
- 1.5 The site lies within the Hatton Garden Conservation Area, the Holborn Growth Area, the Central London Area, three protected vistas to St Paul's Cathedral (from each of Blackheath Point, Greenwich Park Wolfe Statue and Primrose Hill Summit) and an Archaeological Priority Area. It is also designated as being within the Knowledge Quarter as part of the draft Site Allocations document (2019).
- 1.6 There are other notable historic buildings and designations in the vicinity of the site including St Alban's Church (Grade II*) and the St Alban's Clergy House at No. 18 Brooke Street (Grade II). Opposite the site to the north is Brookes Market Open Space.
- 1.7 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). Chancery Lane underground station is located less than 100m from the site to the south-west. There are also several bus routes available nearby.

2 THE PROPOSAL

- 2.1 The application is for the partial demolition, refurbishment and extension of 2 Waterhouse Square to provide 29,853sqm of commercial floor space (uplift of 627sqm) in the form of 29,531sqm of commercial floorspace (Class E) and a 322sqm of commercial/bar (Class E/Sui Generis) space.



Figure 3. Images of extension adjacent to main Waterhouse Square buildings (two separate images shown above).

- 2.2 The existing seven storey building would be partially demolished and its façade replaced. The existing atrium would be removed, with a new glass roof installed to allow light to penetrate into the re-instated historic courtyard below. The development would provide a modernised seven storey building that is greater in height than the existing by a maximum of 4 metres. The development would have contemporary architecture that responds to the historic fabric of Waterhouse Square and which provides highly sustainable and flexible internal accommodation with an active public realm.



Figure 4. Proposed ground floor plan.

- 2.3 The development would include two new pedestrian access points within the external Waterhouse Square building fabric, one to the northern side of the

easternmost new commercial unit and another directly from Leather Lane into the Waterhouse Square courtyard via existing access corridors. The number of cycle spaces would be increased by 421.

3 RELEVANT HISTORY

2 Waterhouse Square

- 3.1 The following applications have been submitted for the application site in recent years:
- 3.2 2023/0985/P. Infill of existing atria to provide additional office space. Certificate of lawfulness granted 16th November 2023.
 - Granted as the works do not constitute development.
- 3.3 2023/1167/L. Infill of existing atria to provide additional office space. Under assessment.
- 3.4 2012/3633/L. Internal alterations to include the insertion of partition walls, new flooring and lighting alterations at first and second floor level of existing offices (Class B1a). Listed building consent granted 18th September 2012.
- 3.5 2011/5218/P. Installation of seats and planters to the external courtyards of offices. Permission granted 15th December 2011.
- 3.6 2011/5219/L. Installation of seats and planters in the external courtyards of offices. Listed building consent granted 1st December 2011.
- 3.7 2010/2347/P. External alterations including the replacement of shopfronts by new window openings to the east elevation at ground floor level and installation of new main entrance doors, frameless lobby and associated alterations to southern elevation on inner courtyard of office (Class B1). Planning permission granted 25th June 2010.
- 3.8 2010/2371/L. Internal and external alterations, including the installation of new main entrance doors, frameless lobby and associated alterations to southern elevation on inner courtyard, and various internal alterations and refurbishments to ground floor lobby and atrium of office. Listed building consent granted 7th July 2010.
- 3.9 2006/5392/P. Change of use from retail use (Class A1) to office use (Class B1). Permission granted 18th January 2007.

Adjacent Site – 1 Waterhouse Square

- 3.10 This adjacent site has been subject to numerous planning and listed building consent applications in recent years. Those submitted since 2015 are listed below:
- 3.11 2023/0560/L. The proposed works are to be undertaken to the external building fabric of the following locations: RHS of Holborn, LHS of Leather Lane, Courtyard

A, Courtyard B/C archway and Courtyard C. Works are to include the following:
 Overflow Chutes - Core drill of c. 50mm diameter holes from the inside of the parapet gutter through to the external side of the wall. - Line the core drilled bore hole with lead and dress into the inside of the parapet. - The chute will protrude from the elevation c.50-60mm. The variance will depend on any obstructions below the protrusion point to ensure no water runs down the facade. Pigeon Wire - Drill small holes at intervals of c. 1.50m and install 25mm masonry rivets for the stainless steel posts to be inserted into and grouted into place. Enough room is to be left at either end of the runs for an anchor point, c. 115mm. - Install the anchor point via a small drill hole and again, a 25mm masonry rivet. - Install the bird wire as per the manufacturers guidance. Listed building consent granted 4th May 2023.

- 3.12 2019/6389/L. Fit out of space to 7th floor and minor additions to first floor of Grade II* listed building. Listed building consent granted 23rd March 2020.
- 3.13 2019/4403/L. Fit out of spaces to part ground and lower ground floors of Grade II* listed 1 Waterhouse Square. Listed building consent granted 18th November 2019.
- 3.14 2019/3508/L. Installation of one satellite dish to central roof area. Listed building consent granted 3rd September 2019.
- 3.15 2019/2605/L. Fit out of spaces to lower ground, ground, fourth and sixth floors. Listed building consent granted 16th July 2019.
- 3.16 2019/2053/P. Installation of 6no condenser units flat roof area at fourth floor level. Listed building consent granted 2nd July 2019.
- 3.17 2019/1938/L. Listed Building Consent for the installation of 6no condenser units flat roof area at fourth floor level. Listed building consent granted 2nd July 2019.
- 3.18 2018/3457/L. Interior fit out of basement, ground, first second, fourth and fifth floors of 1 Waterhouse Square, including the strip out of existing lightweight partitioning and ceiling systems. Construction of new lightweight partitions, new M+E installation and refurbishment of toilets. Listed building consent granted 3rd December 2018.

Adjacent Site – 3 Waterhouse Square

- 3.19 This adjacent site has been subject to numerous planning and listed building consent applications in recent years. Those submitted since 2015 are listed below:
- 3.20 2023/1376/P. Erection of single storey rooftop plant screen. Permission granted 29th June 2023.
- 3.21 2023/1807/L. Erection of single storey rooftop plant screen. Listed building consent granted 29th June 2023.

- 3.22 2016/5996/L. Interior fit of fourth and fifth floor office areas. Listed building consent granted 18th January 2017.
- 3.23 2016/5515/L. Interior fit of ground floor reception area. Listed building consent granted 6th December 2016.
- 3.24 2016/4358/L. Interior fit-out of part ground and first floor of 3 Waterhouse Square, including strip-out and replacement of lightweight partitioning and ceiling systems, new mechanical and electrical installation and refurbishment of WCs. Listed building consent granted 13th September 2016.
- 3.25 2015/6703/L. Interior fit out of the 2nd and 3rd Floor existing office accommodation at 3 Waterhouse Square within the Holborn Bars complex. Listed building consent granted 9th February 2016.

4 CONSULTATION SUMMARY

Statutory Consultees

4.1 Historic England – No objection

Summary

Historic England recognises the benefits of replacing part of the EPR extension to Waterhouse Square with a new building that appears more sympathetic to the listed building's areas of high significance, as well as the Hatton Garden Conservation Area. Although some modest harm would arise from these proposals, we consider there to be a number of heritage benefits that could help to outweigh the harm in accordance with the NPPF.

4.2 Greater London Archaeological Advisory Service (GLAAS) – No archaeological requirements.

4.3 Transport for London – No objection.

4.4 Crossrail – No comment.

4.5 London Underground – No objection.

4.6 Thames Water – No objection.

4.7 Metropolitan Police – No objection, subject to recommendations and a condition to achieve secured by design accreditation. [Condition 25].

Adjoining occupiers

4.8 Four site notices were displayed around the site from the 23rd August 2023, expiring on the 16th September 2023. A press advert was placed in the Camden New Journal on the 31st August 2023, expiring 24th September 2023.

4.9 After the applicant submitted revised plans for the ground floor of the development showing the provision of a flexible commercial/bar unit the proposal was re-advertised. Four site notices were displayed around the site from the 27th October 2023, expiring on the 20th November 2023. A press advert was placed in the Camden New Journal on the 2nd November 2023, expiring 26th November 2023.

Representations summary

4.10 Letters of objection were received from 18 separate addresses, which are:

- Nos. 1, 3, 5, 7 & 10 Beauchamp Building
- Nos. 62 & 90 Vesage Court
- No. 702, 7 High Holborn
- 11 Grove Terrace (comment only)
- 97 Calabria Road
- Marriner House, 32-34 Greville Street

- 6 Cranley Buildings
- Nos. 2 & 11 Langdale House, 4-12 Dorrington Street
- No. 2, 32 Leather Lane
- No. 14 Vetro Building, 20 Clere Street
- Address not given

4.11 One further letter of comment was also received from the Gamages Tenants and Residents Association.

4.12 The letters received raised the following issues:

Land Use

- No demand for office accommodation.
- No community facilities provided.
- Bar is inappropriate use for area.

Officer's response: See Land Use section below.

Heritage and Conservation

- All of the existing buildings which contribute to the character and appearance of the conservation area should be retained.

Officer's response: See Heritage section below.

Design

- Low quality architecture and materiality.
- Out of keeping with local character.
- Excessive height.

Officer's response: See Urban Design section below. The height of the new development would be only slightly greater than the existing building (52m AOD compared to 48.2 AOD).

Amenity

- Loss of sunlight and daylight to nearby properties.
- Increased noise from bar/commercial activities and plant equipment.
- Loss of public green space.
- Overshadowing of nearby open space.
- Increased anti-social behaviour.
- New benches would increase public disturbances.
- Increased light spill from the development.
- Increased cost of property maintenance.
- Noise, dust, dirt, fumes/smoke and other impacts from construction works.
- General health impacts from construction works.

Officer's response: See Amenity and Transport sections below. Construction works are a temporary nuisance that is typically controlled by environmental legislation. It can also be controlled through planning, in this case if permission is granted it is recommended that it is subject to a Construction Management Plan which would be

secured by S106 legal agreement. No new benches are proposed in the public realm as part of this application. No green space would be lost as part of this application.

Transport

- Loss of available parking spaces.
- Increased traffic congestion.
- Additional vehicle movements locally.
- Disturbance from construction traffic.

Officer's response: See Transport section below. Construction works would be controlled through a Construction Management Plan and related contributions (implementation support fee and bond) secured by S106 legal agreement.

Sustainability

- Demolition is unjustified due to embodied carbon.

Officer's response: See Sustainable Design and Construction section below.

Consultation and Process

- Lack of public consultation.
- Poorly communicated public consultation.

Officer's response: The applicant has undertaken pre-application consultations with relevant parties as required by the Council's Statement of Community Involvement. The Council has consulted on the planning application in accordance with the legislation and its Statement of Community Involvement.

Others

- Loss of property value.

Officer's response: Loss of property value is not a material planning consideration that can be taken into account during the assessment of a planning application.

4.13 3 letters of support were received from the Central District Alliance and Hatton Garden Business Improvement Districts, and from 36 Laney House, raising the following points:

- Development is sympathetic to local heritage.
- Enhanced public realm.
- New workspace and community spaces.
- Highly accessible location for development.
- Improvements to local economy.
- High internal sustainability.

5 POLICY

National and regional policy and guidance

[National Planning Policy Framework 2023 \(NPPF\)](#)

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

[Written Ministerial Statement on First Homes \(May 2021\)](#)

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

[London Plan Guidance](#)

Local policy and guidance

[Camden Local Plan \(2017\) \(CLP\)](#)

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

[Policy H1 Maximising housing supply](#)

[Policy H2 Maximising the supply of self-contained housing from mixed-use schemes](#)

[Policy C1 Health and wellbeing](#)

[Policy C2 Community facilities](#)

[Policy C4 Public houses](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E2 Employment premises and sites](#)

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

[Policy 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 TC1 Quantity and location of retail development](#)

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

[Policy TC4 Town centre uses](#)

[Policy TC6 Markets](#)

[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:

[Hatton Garden Conservation Area appraisal and management strategy \(2017\)](#)

6 ASSESSMENT

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

7	Principle of Development
8	Land use
9	Conservation and Heritage
10	Urban design
11	Amenity of neighbouring properties
12	Sustainable design and construction
13	Air quality
14	Flood risk and drainage
15	Nature conservation, landscape and biodiversity
16	Transport
17	Safety and security
18	Employment and training opportunities
19	Planning obligations
20	Mayor of London's Crossrail CIL
21	Camden CIL

22	Conclusion – planning and listed building consent applications
23	Recommendations
24	Legal comments
25	Conditions (planning application)
26	Informatives
27	Conditions (listed building consent)

7 PRINCIPLE OF DEVELOPMENT

- 7.1 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved.
- 7.2 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site. The Council anticipates Central London playing a key role in facilitating that growth. The supporting text to Policy G1 states that the Council shall promote and encourage high-quality developments with high densities to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of the borough, whilst also seeking to improve the quality of the environment, protect the amenity of occupiers and neighbours and meet other relevant planning objectives.
- 7.3 The site is located within a Central London area with the highest possible transport accessibility (PTAL of 6b). The proposed development would utilise the site more effectively through increasing the density of the activities on it. The development would reuse a large proportion of the existing building structure and would provide a building that is of a high-quality internal layout and overall design. An assessment of the proposed building's impact on the local built environment is provided in the heritage and design sections (Sections 9 and 10) below. The development's impact on the occupiers of nearby residential properties is discussed in the amenity section (Section 11) below.
- 7.4 As such, the principle of partially demolishing, refurbishing and extending the existing building to create a higher density commercial development is considered acceptable in respect of the objectives of the NPPF and the Camden Local Plan subject to the consideration of all other relevant matters as described below.

8 LAND USE

Introduction

- 8.1 The proposed development is for the partial demolition, refurbishment and extension of the existing buildings on the site, including replacement of the existing façade, to form a new seven storey building providing replacement commercial space (Class E) and retail/bar space (Class E/Sui Generis).
- 8.2 The existing and proposed land uses on the site are as follows:

Use	Existing sqm (GIA)	Proposed sqm (GIA)	Change sqm (GIA)
Class E	29,226	29,531	+305
Class E / sui generis (bar)	0	322	+322
<i>Total</i>	<i>29,226</i>	<i>29,853</i>	<i>+627</i>

Figure 5. Existing and proposed land uses on the site (GIA)

Increased Commercial Space

- 8.3 Local Plan policy E1 seeks to secure a successful and inclusive economy and encourages economic growth. Policy E2 encourages the provision of employment premises and sites. Policy G1 seeks a mix of uses in accessible parts of the borough (including self-contained housing where appropriate), including the provision of 695,000 of office floor space and 30,000sqm of new retail space by 2031. Policy G1 states that the most significant growth will be expected in the borough's growth areas which includes Holborn.
- 8.4 Policy TC1 of the Local Plan seeks additional provision of retail and other town centre uses such as food, drink and entertainment activities in growth areas such as Holborn. Policy TC4 states that new town centre uses should not cause harm to the character, function, vitality and viability of the local area, and that potential harm shall be managed through conditions and planning obligations. Policy C4 of the Local Plan states that the Council will support the provision of new public houses in appropriate sites in growth areas, highly accessible areas and town centres.
- 8.5 There would be an increase of 627sqm in commercial floorspace at this site in the form of Class E (office, retail) and Class E/sui generis (retail/bar) floor space. The new Class E and Class E/bar spaces would be provided at ground floor level in corner locations that would activate the surrounding streets. The office activities would be located on the floors above.
- 8.6 The existing site contains office uses and as such re-providing reconfigured and higher density office floorspace in this highly accessible growth location is acceptable. The improved quality of the offices would help to attract and retain businesses in the area and would act as a catalyst to re-activate this currently vacant existing office site. Local plan policies also support the provision of town centre uses such as retail, food and drink premises, including new drinking establishments, in highly accessible growth areas such as Holborn.

The local area is already highly commercial at ground floor level and this proposal would reflect that character and function. The proposed development, through the high-quality of the new ground floor commercial uses and the increased density of its office uses on the upper floors, would be expected to bring increased pedestrian activity into the area thereby increasing spending, improving the vitality of the local area and the viability of existing commercial activities in the surrounding streets.

- 8.7 The scheme results in a net increase of employment floorspace of 627sqm and therefore doesn't trigger the requirement set out in the CPG for affordable workspace (trigger is 1,00sqm).

Non-provision of self-contained housing

- 8.8 Policy H2 of the Local Plan states that where new development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses. The policy continues, that in the Central London Area (CLA) development providing more than 200sqm of additional floorspace will require 50% of all additional floorspace to be self-contained housing, unless there are practical reasons relating to development character, function and ability to meet policy requirements as to why this cannot be achieved. If the site and development are considered unsuitable for new housing a financial contribution in lieu of housing shall be secured instead. The supporting text to Policy H2 describes that developments with greater than

1,000sqm of new floorspace will generally be able to provide new housing on-site. As such, it is considered more difficult for developments with new floor areas below this threshold to achieve on-site housing.

- 8.9 The local area includes multiple properties with residential on upper floors and as such local character is not a valid reason for failing to provide residential accommodation at this site. However, the development represents a relatively small increase in commercial space. Furthermore, the design of this development proposal has placed a strong emphasis on replacing large areas of inactive frontage that currently exist onto Leather Lane, Beachamp Street and Brookes Street (as the result of the large proportion of service and administrative functions at ground level) with active uses and a new prominent main entrance. Providing residential uses on the floors above would increase the amount of service, storage, core and other ancillary residential space needed at ground floor, leading to reduced urban design and community safety improvements from the development. It would also reduce the functionality and comprehensiveness of the office re-configuration on the upper floors, which would reduce the applicant's incentive to bring this scheme forward for development given that the overall floorspace uplift is relatively small for a central London location.
- 8.10 The requirement for an additional residential core at the site would also lead to further demolition of the building, which the developer has attempted to minimise in accordance with the Council's sustainability policies.
- 8.11 As such, it is considered that the provision of on-site housing is not suitable as part of the proposed mix of uses in the specific circumstances relating to this development proposal, as described above. The nature of the dense urban environment of the local area also means that there are no other appropriate developable sites immediately available nearby where housing could be provided instead. Therefore, Policy H2 allows that, in an exceptional situation such as this, a payment in lieu of providing new housing on-site may be secured instead. This has been calculated at £470,250 and shall be secured through S106 legal agreement.

Impact on Adjacent Street Market

- 8.12 The site is located adjacent to the Leather Lane market which operates Monday to Friday. Policy TC2 of the Local Plan states that the Council will support Camden's markets and policy TC4 states that the impact on markets shall be considered as part of new town centre development. Policy TC6 states that markets in Camden will be protected and promoted.
- 8.13 The proposed development has taken into account the existing neighbouring street market on Leather Lane. The market caters specifically to providing street food and the proposed Class E and Class E/bar units have been designed to complement and not replicate the character and activities of the market. The new units are expected to enhance the existing retail offer through providing high quality new retail units adjacent to the Leather Lane local centre. The ground floor retail units would have a fairly typical contemporary commercial design that allows for a flexible range of activities, such as a shop unit, café, small restaurant or ancillary office space to be accommodated, but which would not suit a dedicated market-style layout. The very nature of street food markets means they are best suited to either large floor plan or fully open-air spaces, which is not the type of commercial space being

provided as part of this development. The proposal is instead expected to increase the density and quality of office and other commercial floor space, which should act to attract more pedestrians and other potential customers into the local area. The Council's Markets Officer has been consulted on this application and has raised no objections to the proposed uses.

- 8.14 The retail units and reception area of the new building would provide accessible bathrooms that the market traders would have access to as part of an enhanced relationship between the proposed development and the existing market. This shall be secured through the s106 legal agreement.
- 8.15 As such, it is expected that the proposed development would enhance and not be of detriment to the existing street market on Leather Lane.

Summary

- 8.16 The proposed reconfiguration and extension of the existing office use is strongly welcomed and will bring economic, employment and training benefits to the area. The provision of flexible Class E floor space at ground floor, which includes potential for a small bar, is also supported as it would maximise the vitality of this town centre local, contribute towards overall local commercial viability, and bring urban design benefits such as improved activity and surveillance onto local streets. The existing street market on Leather Lane would be respected and enhanced as part of this development.
- 8.17 It is acknowledged that the development would provide no new housing and thus falls short of the 50% target in Policy H2, however it is acknowledged in this case that providing housing on-site would significantly erode other benefits of the scheme including the proposed improvements to ground floor activity and safety, the vitality and viability of the town centre, the quality of the reconfigured office space, a reduction of the sustainability of the development by virtue of requiring additional demolition. Furthermore, there are no suitable sites available nearby for new off-site housing, and thus the provision of a payment in lieu is exceptionally considered acceptable in this case.
- 8.18 As such, it is considered that the development proposal is acceptable in land use terms and for all other reasons, subject to further consideration of the relevant matters in the sections below.

9 CONSERVATION AND HERITAGE

Policy Summary

- 9.1 Policies D1, D2 and CPG Design of the Camden Local Plan are relevant to conservation and design. The supporting text of policy G1 seeks development of the highest quality.
- 9.2 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") are relevant with regards to impacts on heritage assets. Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area and S.66 imposes a similar requirement in relation to listed buildings and their settings when considering applications relating to land or buildings within that area. The

effect of these sections is that there are statutory presumptions in favour of the preservation of the character and appearance of Conservation Areas, the impact of works to the listed building and the impact of those works on the setting of listed buildings.

- 9.3 The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 12). Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. Para 195 states that local authorities, when considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal. Para 197 states that in determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 9.4 Para 199 states that when considering the impact of a proposed development on a heritage asset (including through its setting), local planning authorities should give 'great weight' to preserving the asset's significance (and that the more important the asset the greater the weight should be). The decision-maker must give "considerable importance and weight" to any finding of harm, and any harm or loss requires clear and convincing justification (paragraph 200).
- 9.5 The NPPF also states in para 202 that where less than substantial harm is identified, it should be weighed against any public benefits and that considerable importance and weight must be attributed to the harm in such balancing exercise. Para 203 states that a balanced judgement on the effect of proposals on non-designated heritage assets is required, having regard to the scale of harm that would be caused to them.



Figure 6. Waterhouse Square building frontage (from Holborn).



Figure 7. Waterhouse Square building entrance, close up (from Holborn).



Figure 8. 1990s rear extension to 2 Waterhouse Square (from Brooke's Market).



Figure 9. 1990s rear extension to 2 Waterhouse Square (from east on Greville Street).

Site and surrounding context, and their significance

- 9.6 Waterhouse Square, also known as Holborn Bars or the Prudential Assurance Building, was built between 1885 and 1901 as a large office complex for the Prudential Assurance Society and remains in office use. It was designed by Alfred Waterhouse - a celebrated 19th Century English architect and a leading proponent of the High Victorian Gothic style.
- 9.7 Externally, the complex is dominated by its dramatic front range, known as the Furnival's Inn block, constructed in striking red brick and terracotta on a granite base, and composed of a central tower terminated by corner turrets and hipped roof with fleche. The tower is flanked by tall decorative wings. It is an imposing and striking historic landmark in views along High Holborn.
- 9.8 The tower features a large carriageway arch at its base which leads to a series of decorative and enclosed courtyard areas, two of which are publicly accessible with additional arched entrances on Leather Lane and Brooke Street. The courtyard plan evokes the layout of Furnival's Inn which previously occupied the site, and is a defining component of the listed building's plan form and architectural character.
- 9.9 Significant interiors survive particularly within the Furnival's Inn block, and whilst much of the complex has undergone numerous office refurbishments over the years, high quality circulation spaces are evident throughout.
- 9.10 The building complex was altered and extended in 1930-32 EM Joseph which introduced larger floorplates and Art Deco decoration to the building complex. Much of that phase of development was replaced in 1989-93 by EPR Architects who

introduced a large extension to the rear and extensively redeveloped the Brooke Street range behind the inner courtyard facades.

- 9.11 The EPR work maintains the general building height of the Waterhouse Square complex, and its Post-Modernist elevations are built in polished pink granite which complements the materiality of the original building. The EPR work has an architecturally unresolved junction with the brickwork façade along Leather Lane by Greville Street. Its relationship with the retained 1878-9 fragments along the Brook Street façade is similarly unsuccessful. The existing offices do retain some striking Victorian architectural features including decorative columns, ceilings and panelling, as well as glazed brickwork and tiles in the circulation spaces.
- 9.12 Waterhouse Square remains a building complex of considerable architectural and historic interest as recognised in its high level of listing at Grade II*. Its significance is within the parts of the site erected to the designs of Alfred Waterhouse, evidential value, its architectural design and materials, and its townscape contribution including its positive contribution to the character and appearance of the Hatton Garden conservation area. Waterhouse Square is considered a key landmark within Sub Area 4 of the Conservation Area.
- 9.13 The Hatton Garden Conservation Area Appraisal and Management Strategy (HGCAAMS, 2017) stresses that the EPR additions “lack interest”. The negative qualities of the extension are also highlighted in relation to Brooke’s Market. The Appraisal states that “Brooke’s Market has a strong character which comes from a series of brick buildings whose frontages directly address the central open space and its mature trees, but the south side of Brooke’s Market and Brooke Street suffer from the inactive frontages of the Waterhouse Square development”.

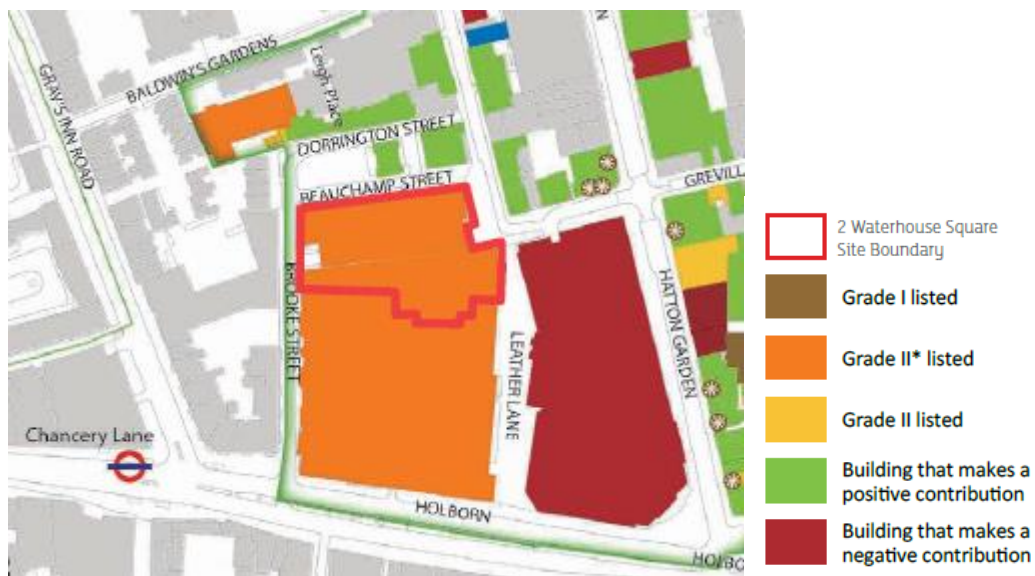


Figure 10. Historic buildings in this part of Holborn (from HGCAAMS)

- 9.14 The Hatton Garden Conservation Area Appraisal and Management Strategy identifies the C19th/early C20th parts of Waterhouse Square as making a positive contribution to the character and appearance of the conservation area whereas the late C20th parts are noted as not contributing positively to the character and appearance of the conservation area. The buildings adjacent to the part of the site

proposed for redevelopment (Beauchamp Street, Dorrington Street, and Leather Lane north of Greville Street) are predominately positive contributors. As well as containing the Grade II* listed Waterhouse buildings the site forms the setting of several listed buildings. Those most immediately affected by the proposals are: 18 Brooke Street (Grade II), Church of St Alban the Martyr Grade II*, 10-11 Greville Street (Grade II).

Proposal and Assessment

9.15 Impact on Significance of Listed Building Fabric

9.16 The works affecting the listed building are predominantly internal and includes works such as revealing internal window heads through the removal of the internal dropped ceilings, reinstatement of an entrance way in the internal porch area, greater revealing of existing walls within the new atrium area and general retention and restoration of original Waterhouse fabric throughout the site. Although there would be some demolition to parts of the later 1990s extension the fabric of that part of the site is not listed and therefore results in no loss of heritage significance.

9.17 In terms of the listed fabric there are also external changes proposed, which are the creation of two new openings on the northern and eastern elevations of the historic part of the development. One opening would provide access into the easternmost new Class E unit from Leather Lane/Greville Street. The other opening would provide access directly from Leather Lane into an existing corridor and onto the Waterhouse Square internal courtyard. This second entrance would also require removal of railings and a wall adjacent to Leather Lane.

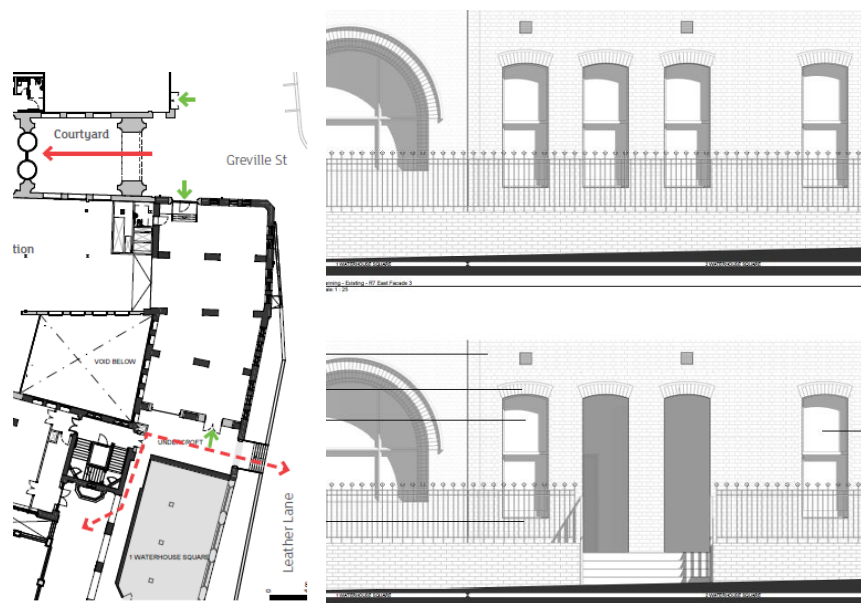


Figure 11 and 12. Proposed new northern (to top of Class E unit) and eastern (to right of undercroft) entrances [left image]; and existing (top) and proposed (bottom) view of location of new eastern entrance [right image].



Figure 13. Existing (left) and proposed (right) view of new northern entrance.

9.18 These works would demolition and alter the Grade II* building's 19th Century fabric and would create harm to its significance due to the loss of this historic fabric and plan form. It is also considered that there would be a loss of evidential value to the site as the original building was not intended to be accessed in the manner proposed. However, it is considered that the entrances are sensitively designed from a heritage perspective with an architectural language used that is appropriate for each opening within the context of its host elevation and proposed activity. As such, although there is harm it is considered that this is less than substantial harm and at the lower end of the less-than-substantial scale.

9.19 Para 202 of the NPPF dictates that where less than substantial harm is identified, it should be weighed against any public benefits. The use of the building was originally as commercial space and the proposed accesses would help to facilitate the ongoing commercial use of this site, as well as increasing activity on the ground floor through improving public access to underused parts of the existing site. As such it is considered that securing the optimum viable use of the site, increased commercial activity and increased public safety and security would be sufficient public benefits to outweigh the low level of less than substantial harm in this case. This position is supported by both the Council's Conservation Officer and Historic England.

9.20 Impact on Significance of the Conservation Area and the Setting of the Listed Building

9.21 The Hatton Garden Conservation Area Appraisal and Management Strategy (HGCAAMS) states that the recent extension to Waterhouse Square "lacks interest and is at odds with the character of the area". This recent extension would be replaced with a structure that is slightly higher, and of slightly greater scale and massing overall, but which would have a more articulated form and would feature an improved and more active street frontage, compared to the existing building. The articulation of the new facades would be well-considered in terms of the use of relatively restrained materials, punctuated by high-quality detailing, and the rhythm of bay widths which reflects that on the historic Waterhouse Square buildings. The proposed development would therefore engage better with the surrounding public realm compared to the existing extension which is noted in the HGCAAMS to be of relatively low design quality.



Figure 14. Image of new development from Brooke's Market (north).

- 9.22 The limited increase in the massing and scale to the north block means that the proposed development would not obstruct any key views of the historic buildings in the local area. Furthermore, the relatively restrained external materiality, as well as the overall design improvements referenced above, would ensure those historic buildings have prominence in the surrounding public realm. This would preserve the character and appearance of the conservation area and would not detract from the setting of the Grade II* listed building when compared to its current appearance and setting which includes the existing extension.
- 9.23 When viewed from within the main internal Waterhouse Square courtyard to the south of the site, the existing rear extension is partially visible, which encroaches on the silhouette of the existing historic building. The proposed building would appear reduced in height, compared to the appearance of the existing extension, when viewed from this internal courtyard area. This would reduce the level of existing harm to the listed building as a result.



Figure 15. Images of the existing extension (left image) and the proposed development (right image), see top left corner of both images, from the Waterhouse Square courtyard.

9.24 Given that a low quality existing extension would be replaced, and given that the proposed development would have a restrained yet improved design that respects key local heritage views and local context, including improving heritage views from within the Waterhouse Square courtyard, it therefore is considered that the proposed development would meet the statutory obligation to have due regard to the character and appearance and setting of statutorily designated heritage assets (the conservation area and listed building) and would result in a neutral to mildly beneficial impact on the setting of the listed building and preserve the character and appearance of the conservation area.

9.25 London View Management Framework

9.26 Policy HC4 of the London Plan states that developments should not harm the characteristics and composition of Strategic Views.

9.27 The building would sit underneath the location of the closest protected view of the London View Management Framework (5A.2 Greenwich Park to Central London, which is at 52.3m AOD) and as such the development would not harm any strategic view.

Conclusion – Impact on significance

9.28 The proposals comprise **less than substantial harm**, at the lower end of the scale as regards the introduction of new openings into the historic fabric of the Grade II* listed building on Greville Street and Leather Lane.

9.29 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the harm caused to it. As there is less than substantial harm caused to the significance of designated heritage assets, this harm should be weighed against the public benefits of the proposals in reaching a decision in accordance with para 202 of the NPPF.

9.30 The use of the building was originally as commercial space and the proposed new accesses would help to facilitate the ongoing commercial use of this site, as well as increasing activity on the ground floor through improving public access to underused parts of the existing site. As such, it is considered that securing the optimum viable use of the site, increased commercial activity and increased public safety and security would outweigh the low level of less than substantial harm in this case.

9.31 As such, on balance, the proposed development is acceptable in heritage terms.

Archaeology

9.32 The site is located within an Archaeological Priority Area (Tier II). The Greater London Archaeological Advisory Service were consulted and have no objection to this development proposal.

10 URBAN DESIGN

10.1 Camden Local Plan policy D1 and D2, and CPG Design, are relevant to the consideration of design when assessing planning applications, and reference the

protection of strategic views. Policy D3 requires well-designed shop fronts. The CLP identifies the Holborn Growth Area as a part of Camden where significant growth is expected to be concentrated.

Site appraisal and opportunity

10.2 The existing extension on the site extended the original Waterhouse Square development north over Greville Street. The square to the east of the building was created as a result and is an important pause in the townscape with Leather Lane opening up at the junction of Greville Street. The existing extension is faced with pink granite which is sympathetic in tone to the red brick finish of the historic Waterhouse Square buildings, though it is also noted that the conservation area guidance document considers it a low quality feature in the local neighbourhood. At ground floor there is very little activity or engagement with the streets around the building other than at the vehicular service entrance on Brooke Street.

10.3 There is potential to improve the contribution this site makes to the local streetscape through:

- Increasing the number of entrances at ground floor to improve safety of the streets in and around the site;
- Introducing high quality public realm improvements including new routes, street planting and greenery to improve safety and permeability;
- Improving access to the publicly accessible courtyard within the Waterhouse Square complex;
- Improving the safety of Brooke's Market;
- Enhancing the relationship with the heritage assets and refurbishing and restoring the listed buildings;
- Improving the sustainability credentials of 2 Waterhouse Square and the wider estate; and
- Creating a richer mix of uses across the ground floor and contributing to the improvement of the public realm.

Assessment of proposals

Key features of the proposed development

10.4 The development would appear as a comprehensive redesign of the existing extension, albeit in practice 83% of the volume of the existing building including a large part of the steel frame and the foundations, would be retained. The development proposes to extend the life of the existing building as far as possible, and to achieve this an element of demolition is required in order to achieve the necessary improvements in internal quality. Parts of the existing extension's internal structure would be demolished to be replaced with a wider, lighter internal atrium and a new courtyard, accessed through an archway feature that acts as a continuation of Greville Street. These works would also enable improved access to and through the building and its floors.

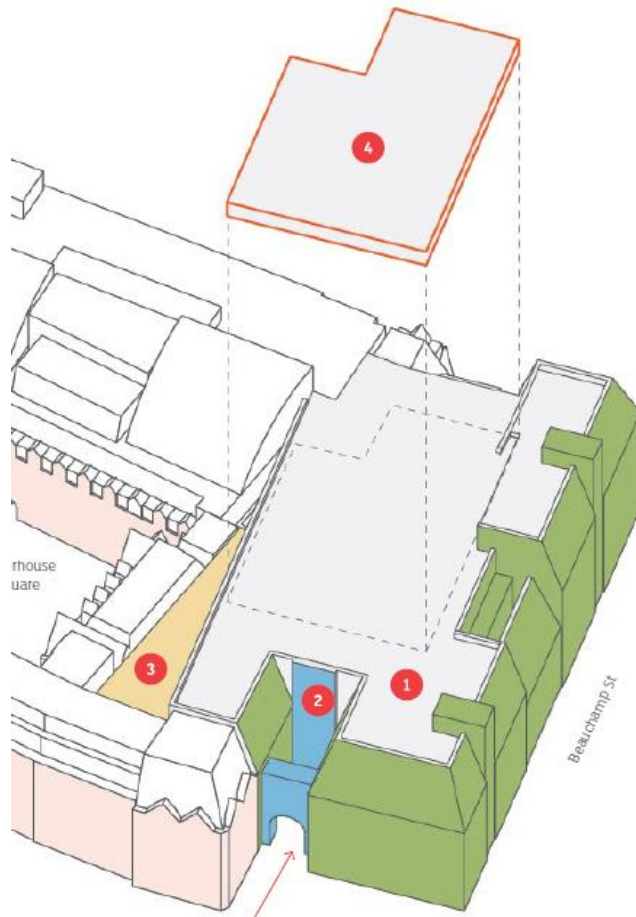


Figure 16. Key features of the design include the new façades (1), an arched entrance to a new courtyard (2), a large glazed internal atrium (3) and a set-back additional storey.

10.5 The external granite cladding will be predominantly replaced, with some being retained as part of a ground floor plinth. Other parts of the cladding would be reused in the existing building, including as part of pre-cast concrete panels and internal design features.



Figure 17. The internal layout and building quality improvements, including new cores, raised floor levels and active ground floor frontages, necessitate the removal of most of the existing granite cladding (areas removed in red).

10.6 Upper floors of the building would be re-articulated and infilled as appropriate to maximise the quantum and quality of the internal floorspace. An additional storey

would be added onto the roof. The roof levels would be staggered on the northern side of the site to enable terraces to be integrated and to ensure the scale and massing of the structure on that side is limited.



Figure 18. Before and after images of the existing rear extension and the proposed development, demonstrating the similar siting, scale and massing.

Design Review Panel

- 10.7 On 9th June 2023, the emerging proposals were presented to the Design Review Panel (DRP). The panel welcomed the distinction between the extension and the historic Waterhouse Square building. There was support for the massing, the treatment of the original Waterhouse fabric, the reinstatement of the internal courtyard and the overall architectural principles.
- 10.8 The panel took the view that a colonnade onto Leather Lane (a feature included in previous pre-application versions of the scheme) was unnecessary and that the Greville Street entrance appeared unresolved and too dominant. The sustainability approach was welcomed but further justification required in relation to the façade replacement. Following the DRP review, these recommendations were taken on board and are reflected within the development as it is currently proposed. The colonnade was removed, and the Greville Street entrance was amended to have a more subtle relationship with the listed building. Further justification for the internal demolition and façade replacement have been provided and are described above and in Figure 17.
- 10.9 It is considered that the changes made following the DRP review sufficiently addressed the comments made by the panel, resulting in an improved proposal, and therefore no further review is required.

Design response

- 10.10 The proposed site wide strategy would create an improved ground floor experience in and around Waterhouse Square. Through positive engagement with its surroundings and the introduction of active frontages, the proposals would deliver sensitive and high-quality new architecture, with improved connections provided to and through this unique complex of historic buildings and an improved active contribution to the surrounding public realm also provided.

- 10.11 Through the reworking of the existing extension, with existing materials being reused and recycled, the proposed development reimagines the existing building to create a resilient new building that respects its sensitive historic context and which substantially bolsters its environmental performance in the process.

Ground floor layout, uses and public realm

- 10.12 The proposed development would feature offices on upper floors and a mix of commercial uses at ground level to ensure the ground floor would be significantly more engaging and characterful.
- 10.13 The new office entrance on Greville Street would connect through to the existing entrance to the site from the south on Waterhouse Square. A new cycle entrance would be provided within the Brooke's Market elevation, thus further increasing the degree of activation to the currently blank frontage in this area. A new public route through the site would be introduced from Leather Lane to Waterhouse Square and a new commercial unit fronting onto Greville Street would sit within the historic building fabric. The new arrangement would provide more active frontage to the perimeter of the site whilst also providing a greater degree of connectivity through the site which accords with the requirements of policy D1. The significantly higher degree of active frontage would also contribute positively to the vibrancy and economic vitality of Leather Lane.
- 10.14 The main servicing provision is on Brooke Street which is the same as the current arrangement. Its location on Brooke Street ensures vehicular servicing movements are kept away from the most well used areas of public realm at Greville Street, Leather Lane and Brookes Market.



Figure 19. Image of the proposed Leather Lane elevation shows how ground floor passive surveillance of local streets would be improved.

10.15

10.16 It is understood that the applicant has an aspiration to work with the Central District Alliance Business Improvement District, which covers this part of Holborn, to help create a vision for surrounding public realm areas including Brookes Market, which is welcomed. Public realm improvements in the form of financial contributions towards the local pedestrian and cycling environment, and towards improvements on Brooke's Market, will be secured through s106 legal agreement.

Scale and massing

10.17 The proposed development would partially demolish, refurbish and extend the existing extension to form a seven storey building on the site. The massing of the development would successfully balance its relationship with both the Waterhouse Square courtyard and the public realm of Brooke's Market to the north. It would also have a relatively limited impact on the amenity of existing properties in the local area, and this is discussed in further detail in the relevant section below (Section 11).

10.18 The proposed building would have a maximum datum of 52.0m. This would be only 3.8 metres greater than the maximum height of the existing extension (48.2m) and it is considered that this relatively minor increase does not present any townscape concerns as a result.

- 10.19 A series of measures have been employed as part of the proposal to break down the bulk of the building and ensure it responds well to its context. The Hatton Garden Conservation Area is characterised by narrower plot widths with a more vertical emphasis. In response, the proposal would create a more modulated and sculptural form that reads as a series of distinct volumes. Along the northern elevation to Brooke's Market, the building is subdivided into bays, with the existing staircases punctuating the façade, accentuating the verticality of the proposed building and further breaking down its mass. This creates a more contextual and softer southern edge to Brooke's Market and Beauchamp Street.



Figures 20 & 21. Image (right) shows revised articulation onto Brooke's Market and (left) shows detailed example of window reveals

- 10.20 A varied roofscape is proposed. Gables reveal where the blocks shift in height which responds to the character of the area. Additionally, the roof pitches back to create a softer edge when viewed from street level and to maintain light to Brooke's Market. There are a series of existing windows in the Cranley Building on its southern facade. To address these, the proposed massing will step down, in a similar manner to the current building to allow more daylight to reach these properties.
- 10.21 The roof pavilion would be most prominently read from within Waterhouse Square itself but is also visible from longer views along Greville Street. The proposed architectural response results in an undulating roofscape with depth, layering and the expression of arches which creates interest when seen in glimpsed views. It appears as a more refined composition than the existing roofscape when viewed from Waterhouse Square.



Figure 22. Image (right) shows new arched entrance which forms a continuation of Greville Street

Architectural approach

- 10.22 The proposals present a contemporary response to the architectural expression found in the Hatton Garden Conservation Area. The design references features that are visible within the surrounding townscape including the introduction of a sense of narrower plot widths, and the expression of gables; the proposal has a more sculpted form and a more characterful and engaging ground floor. Architecturally the extension has been designed to relate well to the existing listed building, albeit with a different aesthetic, to form a well-considered piece of townscape.
- 10.23 The design of the proposed facades applies the above principles to create interesting and varied elevations. The façade is treated in a single material to the walls and roof to maintain a sculptural quality; within this the fenestration shifts to create larger and smaller openings, bringing articulation and richness to the façade. Larger openings will be subdivided to allow for openable windows which is welcomed. At the building's corners balconies would soften the edges of the building.

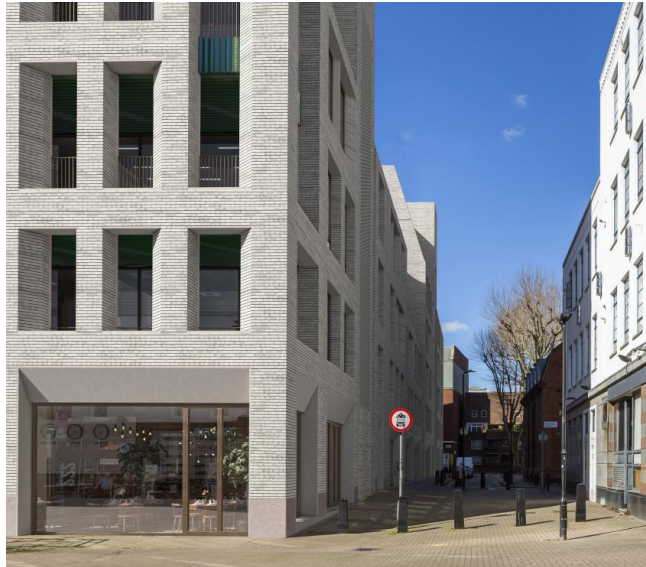


Figure 23. Close up image of junction of Leather Lane and Brooke's Market

10.24 At ground floor there is a greater level of visual transparency with larger window openings to improve the level of engagement. The consistent scale and detailing of the design would unify the ground plane and the public realm experience around the perimeter of the building.

10.25 A new entrance is proposed on the Greville Street axis, set-back within an external courtyard to better define the main access point and provide some respite and calm from the busy market, which operates daily. The proposed entrance expression takes inspiration from the surrounding Waterhouse Square architecture. Waterhouse used enlarged arches to define entrances and routes into the site. With this new entrance, an arched link bridge between blocks leads into a landscaped courtyard. Beyond that main arch is another archway that marks the entrance to the historic building. The windows above the entrance and bridge are of a tighter scale to reinforce the definition of a new route into the site.

Materiality

10.26 The pink granite material on the existing Waterhouse Square extension is not commonly found elsewhere in the conservation area. The proposed new facades would include a buff brick as the primary facing material with masonry shingles at roof level. The use of brick as a finishing material is more consistent with the surrounding brick buildings of Brooke's Market and the wider conservation area, whilst also being complimentary to the historic terracotta facades of the Waterhouse Estate. The proposals state that the pink granite would be re-used where possible, which is welcomed. The first re-use option is for it to be incorporated into the ground floor building plinth. The viability of this option is still being explored. Precast panels are another design option and the granite may also be re-used in a range of building features including terrazzo flooring, planters and landscaping, waste-based bricks or in building aggregate. Further details of material re-use shall be secured through condition (Condition 11).

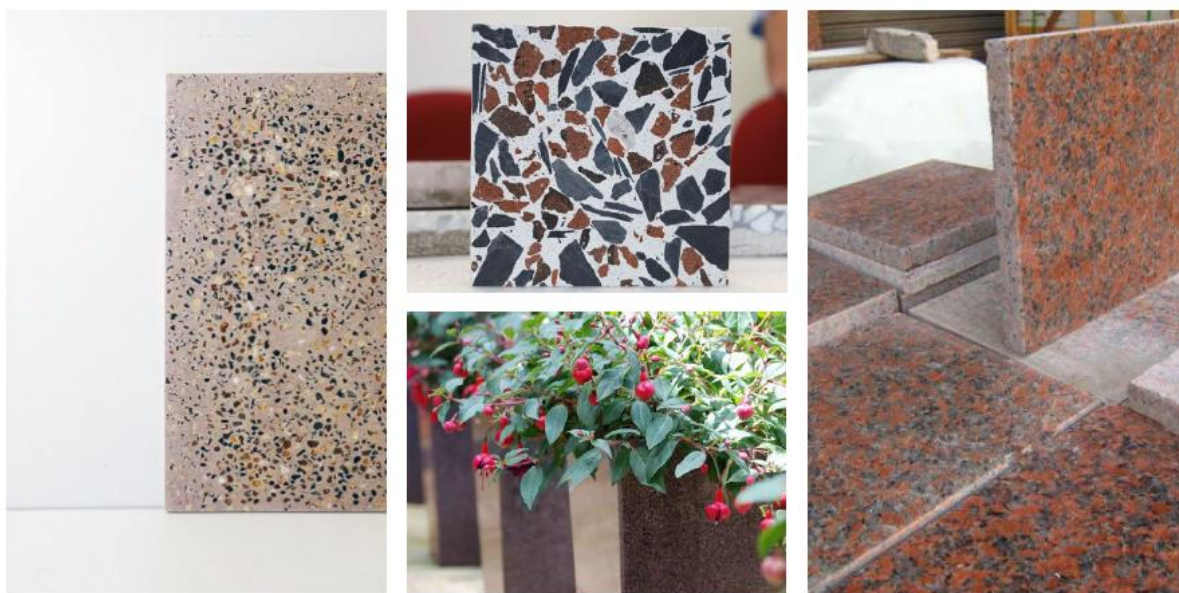


Figure 24. Potential uses for the granite façade includes being part of the ground floor plinth finish, part of stone-faced building cladding, part of the flooring or part of a planter.

- 10.27 The material palette and details as described within the submission documents are of a high quality and are considered to respond appropriately to the character of the area in line with policies D1 and D2 of the Local Plan. Given that the brick and masonry shingle will be the primary facing material, careful consideration has been given to its tone and quality to ensure the successful relationship with the surrounding buildings. Materials and detailing are therefore conditioned [Conditions 3 and 4] to ensure a building of the highest quality with durable finishes that would weather gracefully.

Conclusion

- 10.28 The proposal would significantly improve the experience of the urban block from the street and would enhance the public realm around the site. The design creates an open, publicly accessible, commercial ground plane with active ground floor frontages, and a new route connecting into the courtyard of Waterhouse Square from Leather Lane.
- 10.29 This increased granularity of uses reflects the positive qualities of Leather Lane, and a continuity of street life and character, and begins to bridge the severance to the urban grain that has been created over time by large footprint, overly defensive monumental buildings with fewer entrances, single use blocks and long blank frontages.
- 10.30 The proposed building would knit the development into its context creating a cohesive and coherent townscape that makes a positive contribution to the surrounding streets.
- 10.31 The high-quality architecture demonstrated through its composition and detailing has been well considered and this proposal demonstrates a high-quality

example of how development can enhance the setting of designated heritage assets.

- 10.32 As such, the design of the development is considered acceptable and is in accordance with the requirements of policies D1 and D2 of the Local Plan.

11 AMENITY OF NEIGHBOURING PROPERTIES

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

- 11.2 The closest residential properties are located on Beauchamp Street, Brooke's Market and Dorrington Street to the north of the site, on Greville Street and Leather Lane to the east and on Brooke's Street to the west.

Daylight, sunlight and overshadowing

- 11.3 A Daylight, Sunlight and Overshadowing Report (DSOR) was submitted as part of the application.
- 11.4 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes. However, the guidance should not be applied rigidly and should instead be used to quantify and understand potential impacts when making a balanced planning judgement.
- 11.5 Paragraph 125 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making the efficient use of a site, as long as the resulting scheme would provide acceptable living standards overall.
- 11.6 The BRE assessment methodology has been used for assessing the effects on existing surrounding properties, including daylight (the two-part assessment of VSC and NSL) and sunlight (the two-part assessment of APSH annually and in winter) to buildings and sun-on-ground to amenity spaces.
- 11.7 Detailed tabulated results have been provided showing the daylight and sunlight levels in the existing and proposed conditions, the absolute loss (existing value minus proposed) and relative loss (absolute loss divided by existing value, expressed as a percentage).
- 11.8 To assist understanding of the magnitude of the impacts the terms 'negligible', 'low', 'medium' and 'high' for the magnitude of impact are used, based on the categorisation set out in the table below.

Impact satisfies the BRE guidelines	Impact does not satisfy the BRE guidelines		
	20.1% to 29.9% loss	30% to 39.9% loss	more than 40% loss
Negligible impact	Low magnitude impact	Medium magnitude impact	High magnitude impact

Figure 28 – Categorisation of magnitudes of effect

- 11.9 The methodology and criteria used for the assessment are based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:
- Vertical Sky Component (VSC) – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
 - *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.*
 - No Sky Line (NSL), also known as Daylight Distribution (DD) – This relates to daylight penetration into a room. The area at desk level (“a working plane”) inside a room that will have a direct view of the sky.
 - *The NSL figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).*
 - Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
 - The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.
 - The overshadowing of open spaces is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on Ground assessment has been undertaken which uses the BRE methodology.
 - The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March; if below that the area which can receive some sun on the 21st March should not be reduced to less than 0.8 times its former value.
- 11.10 The map below in Figure 25 shows the location of the surrounding properties tested. Not all properties have been tested and testing of all nearby properties is not considered necessary as those which have been tested can be used as a guide for untested properties in a similar location. The tested properties have been assessed in terms of daylight for both VSC (Vertical Sky Component) and NSL (No Sky Line) and with regards to sunlight for APSH (Annual Probable Sunlight Hours).
- 11.11 In analysing the submitted DSOR it is relevant to note that the separation of the proposed building from existing properties is relatively large for a dense urban environment. The site is separated from the buildings on the north of Dorrington Street (Evelyn’s Buildings, Langdale House, and 17-29 Leather Lane) by 30 metres and from the buildings on the eastern side of Leather Lane (nos. 16, 18, 20-22 and

24-26) by up to 15 metres. It is also relevant to note that the overall height of the building would not change significantly as part of this proposal, with its overall height increasing by 3.8m metres from 48.2m to 52m.



Figure 25: Location of buildings analysed for day/sunlight impacts.

- 11.12 In terms of VSC only one of the windows surveyed would fail the BRE guidelines. There would be a medium (38.89% loss) impact to one window (W8 to Baldwin's Gardens) which already experiences a very low degree of daylight. Furthermore, the other window to the same room (W7) would not be significantly affected (5% loss only) and thus it would still receive a reasonable degree of daylight for an urban area. All other properties would experience a negligible VSC impact in accordance with the BRE guidelines.
- 11.13 In terms of NSL most nearby homes would experience a negligible impact according to the BRE guidelines, with only 15 rooms experiencing a 20% or greater loss of NSL. 1-12 Cranley Buildings (8 rooms) and Evelyn's Buildings (7 rooms) would be most affected. No room would experience a loss of 30% or greater, which means all rooms failing to meet the BRE guidelines for NSL would experience only a low loss of daylight penetration on the working plane (i.e. desk level).
- 11.14 It is notable that all of the residential accommodation assessed would retain good daylight values against at least one of either the VSC or NSL tests, and that where impacts are beyond the BRE guidelines these impacts are considered to be low. As such, the development proposal would not cause an unacceptable level of harm in terms of its daylight impact on nearby residents.
- 11.15 In terms of ASPH, reductions in annual sunlight levels would be generally low to all properties with reductions mostly well below 10%. Some properties, such as at 2 Greville Street (specifically rooms R4/92, R4/93 and R4/94) receive significantly improved daylight levels. Room R5 to Baldwin's Gardens and four rooms to 1-12 Cranley Buildings, would receive annual sunlight losses of between 20-30% which is considered to be either a low impact or at the very low end of the medium level of impact. Where losses to annual sunlight levels are beyond the thresholds of the BRE guidelines the loss of winter sunlight levels would be zero. Where winter sunlight

losses are beyond 20% the annual sunlight levels do not exceed a 10% (very low level) reduction. Therefore, the development would not cause an unacceptable level of harm at nearby properties in terms of an overall loss of sunlight.

- 11.16 Overshadowing of Brooke's Market open space would increase by 50% on 21st March, which is beyond BRE guidelines. This space is already significantly overshadowed by existing buildings and tree planting on all sides and as such on 21st March currently just 12% of this open space receives two hours of sunlight. This would reduce to 6%. The situation would be made a bit worse by the proposal. However, the open space already has a transient character that is predominantly hardstanding no benches or lawn areas where an individual or group may wish to spend a long period of time enjoying sunlight. As such, the level of sunlight received is considered appropriate and reasonable for the specific characteristics of this open area. Furthermore, it should be noted that in periods of hot weather shaded spaces can be considered desirable. During summer months this space would still continue to receive 2 hours of sunlight..
- 11.17 This space is likely to be subject to public realm improvements in the near future. This proposal would provide a financial contribution towards improving this open space, secured by legal agreement, and any future design proposals would consider both improving and responding to access to sunlight in the context of the layout of the space and the wishes of local residents.
- 11.18 As such, the impact on local amenity due to increased overshadowing would be low in this case as the usability of Brooke's Market open space would not significantly change, this open space would still receive reasonable levels of sunlight for its anticipated use throughout the year and the applicant would contribute financially towards appropriate design and layout improvements to this space in the future.

Outlook and Privacy

- 11.19 The locations of the external façades for the proposed development would be in very similar locations to the external façades of the existing building. Furthermore, the total height of the building would increase by just 3.8 metres. There would be some infilling of current recessed areas on the upper floors, but this would not be significant enough to lead to excessive increases in the massing of the building. Therefore, as the scale and massing of the building would not change significantly, it is considered that there would be no significant loss of outlook to nearby properties.
- 11.20 Similarly in terms of the proposed development's impact on the privacy of nearby residents the building's windows on all sides would not be significantly closer to existing residential properties and amenity areas. Furthermore, the proposed office use of the upper floors of the development would be the same as that of the existing building. On many floors the width of individual window apertures would reduce which would help to reduce the potential for overlooking. There would be additional terrace areas on the proposed building though these would be located at a high enough level of the building (fifth floor and above) and set away from site boundaries so that direct overlooking into the windows and amenity areas of nearby residential properties would not be significant. As such, it is considered that there would be no significant loss of privacy to nearby properties.

Noise

- 11.21 A Noise and Vibration Impact Assessment was submitted which assesses the noise impacts associated with the proposed development. This document was reviewed by the Council's Environmental Health Officer.
- 11.22 External plant equipment associated with the proposed development would comprise of four air source heat pumps and two chillers to be located at roof level on 2 and 3 Waterhouse Square. Emergency plant would comprise a single diesel generator for life-safety functions. This would be located within the loading bay at ground floor level and ducted through the northern façade and has been approved in June 2023 as part of planning application and listed building consent refs. 2023/1376/P and 2023/1807/L.
- 11.23 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, Camden's Local Plan 2017 and BS 4142:2014 "Methods for rating and assessing industrial and commercial sound". The submitted plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 11.24 The assessment indicates that the proposed installation should be capable of achieving "Low Observed Adverse Effect Level (LOAEL) of the NPSE and NPPG and achieves the aims of National Planning Policy Framework (NPPF)" at the nearest and potentially most affected noise sensitive receptors. The Environmental Health Officer is satisfied with the proposal in terms of the predicted noise outcomes. Conditions [Conditions 13-17] will be secured that ensure noise from plant, machinery and other equipment shall not exceed existing background levels and in order to appropriately regulate the use and testing of any emergency equipment.
- 11.25 Operational noise associated with the proposed office use is anticipated to be low and not significantly in excess of that which is emitted from the existing uses on site. The hours of use of the proposed terrace areas would be restricted to prevent late night use and this can be secured by condition [Condition 7]. The ground floor uses are not anticipated to be particularly noise creating, given the location of the site in the Central London Area and adjacent to a local centre which already features pubs and restaurants. Although one of the proposed commercial units has the potential to be used as a drinking establishment, such uses are not uncommon in the local area and the unit would be relatively small in size, which would necessarily limit the number of patrons. Management of the premises would be controlled by licensing legislation. Hours of use of all commercial units would be controlled by condition [Condition 6].

Conclusion

- 11.26 An assessment of the amenity impacts on neighbouring properties has been undertaken. The relatively limited loss of daylight and sunlight to some residential properties would not cause an unacceptable level of harm to nearby residents. It is relevant to note in this context that the daylight or sunlight conditions to some properties would improve. The scheme has also been designed to minimise the loss of privacy and outlook to neighbouring properties. The overshadowing of Brooke's

Market open space would increase to a degree in excess of BRE guidelines. However, this space is already significantly overshadowed and improvements to the design and layout of this space have been secured through a financial contribution. Design measures to increase sunlight to this open space would form a part of those future public realm improvements. The proposals are also acceptable in terms of noise impact, subject to conditions.

12 SUSTAINABLE DESIGN AND CONSTRUCTION

- 12.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.
- 12.2 Camden Local Plan policies CC1, CC2, CC3, and CC4 state that 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.
- 12.3 A Sustainability Statement and Planning Report (on the building's structure) have been submitted with this application. Further information on sustainability is also provided in the Design and Access Statement.

Whole life carbon and circular economy

- 12.4 Camden Local Plan policy CC1 requires proposals to optimise resource efficiency, including calculation of whole life-cycle carbon emissions and demonstration of actions taken to reduce life-cycle carbon emissions so these impacts can be considered in assessing a proposal. Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal.
- 12.5 Part of the building would be demolished, whilst the rest is retained, refurbished and extended at roof level. The proposed development would retain the steel frame and foundations of the existing building, which equates to 83% of the existing structure volume. The removal of some floorspace is required to improve access arrangements to all floors via upgraded building cores and to improve daylighting as part of the wider sustainability and longevity improvements to the existing building. Removal of some floorspace also enables a new arched entrance a courtyard to be provided which is a prominent and welcoming entrance to the building that is supported in design terms.

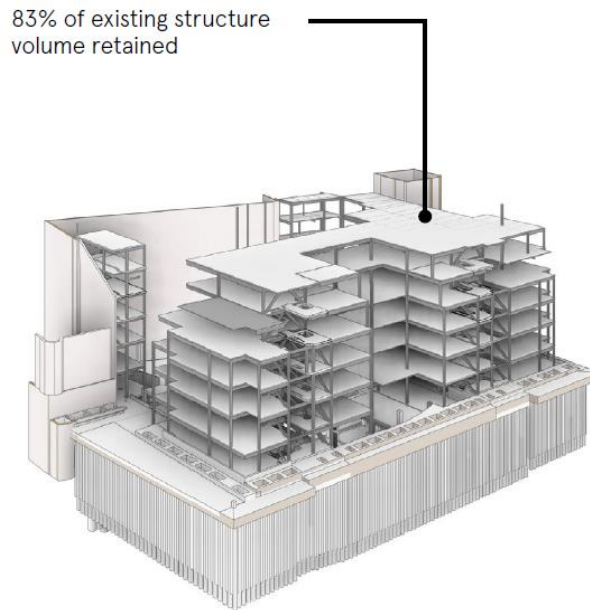


Figure 26: 83% of the existing structure volume would be retained, including the steel frame and foundations.

12.6 The existing façade is unable to be retained as part of these comprehensive building improvements. An upgraded façade in high-performance contemporary materials would be provided instead. As well as having a beneficial visual impact on the public realm, as described in the design section above, the new façade would provide sustainability and longevity improvements to the building through minimising water ingress and facilitating improvements in heat management through reductions in heat gains and heat losses. The new window layout has been designed to maximise natural light whilst also minimising solar gain in summer. The façade replacement would also facilitate comprehensive provision of new mechanical and engineering systems, allied to other design and security improvements such as the provision of an active ground floor frontage.



Figure 27. The internal layout and building quality improvements, including new cores, raised floor levels and active ground floor frontages, necessitate the removal of most of the existing granite cladding (areas removed in red).

Figure 28. The ‘planning scheme’ (Scenario 4 in the chart above) is the most carbon efficient development option of the four scenarios tested. All of the others include retention of the façade.

- 12.7 The Sustainability Statement submitted with the application shows that the carbon savings from the development would be much greater than various less invasive development options over the long term. Assuming a 60 year development lifespan, the proposal (Scenario 4, see Figure 28 above) would result in at least 58 fewer kilograms of carbon dioxide than the next best scenario (Scenario 2 above). The proposed development would result in 240 fewer kilograms of carbon compared to the full façade retention option (Scenario 1) over the lifetime of the development. Without the façade being replaced in full, many of the key sustainability features of this development, such as the increased daylighting of internal floors (though relocated windows) and communal areas (though a new partially glazed archway and courtyard), increased thermal efficiency (new insulation) and glazing heating reductions (through increased U-values), would not be possible in the comprehensive manner that it is currently proposed. As such, the carbon saving would be either lost or significantly reduced.
- 12.8 As such, it is considered that the significant operational sustainability improvements to the building that would be facilitated by this proposed development justify the replacement of the building façade in this case.
- 12.9 The Council’s Sustainability Officer has reviewed the submitted documentation and agrees that the extensive external interventions, allied to other internal improvements proposed, would significantly improve the building’s energy performance which is subsequently reflected in lower whole life carbon values.
- 12.10 The development seeks to divert all construction and demolition waste from landfill with the vast majority of this (at least 95%) being reused or recycled. At least 20% of the material elements of the proposed development would be comprised of recycled or reused content. The Council’s Sustainability Officer supports these objectives. The exact approach to management of construction and demolition waste be secured by condition [Condition 11].

Energy and carbon reductions

- 12.11 To minimise operational carbon new development should follow the energy hierarchy set out in the London Plan. 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).
- 12.12 On-site carbon should be reduced as much as possible.. The following summary table shows how the proposal performs against the policy targets for carbon reductions in major schemes (noting that this scheme is a minor development of less than 1,000sqm of new floorspace), as set out in the London Plan and Camden Local Plan.

Policy target (on-site)	Min. policy target	Proposed reductions
Total carbon reduction: LP policy SI2	35%	49.6%

Be lean stage (low demand): LP policy SI2 (commercial use)	15%	48.6%
Be green stage (renewables): CLP policy CC1	20%	1%

Figure 29 –Carbon saving calculations

12.13 In this case, using the up-to-date Part L 2021 carbon calculations, the development would meet the policy target for major developments as set out in the London Plan of 35% reductions, achieving an overall on-site reduction of 49.6% below Part L requirements as shown in the table above, through the installation of air source heat pumps as well as other energy efficiency measures associated with the refurbishment of this building. This is a good achievement for a minor development of less than 1,000sqm uplift in floor space. The 'be lean' target for major development is also comfortably exceeded.

12.14 It is noted that the 20% carbon reduction target for renewables (such as photovoltaic panels) would not be met. The applicant has stated that they have maximised renewable energy generation on site and are heavily restricted by the historic character of the retained buildings, the need to provide amenity space (in the form of terraces) for building users, the need for mechanical plant storage and the provision of green and blue roofs. The Council's Sustainability Officer accepts these restrictions and is supportive of the overall carbon reductions achieved, despite the development's inability to meet the policy target for renewable energy, which would generally be significantly above the policy target for major applications as described above. It is considered there may be more scope for photovoltaic panels at roof level through measures such as combining them with green/blue roofs. Further consideration of this matter can be adequately secured by condition [Condition 9] in order to bring the development closer to the 'be green' target.

Climate change adaption and sustainable design

12.15 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. The CPG Energy Efficiency and Adaptation sets out in section 11 an expectation for at least 60% of the available credits in Energy, 60% in Water and 40% in Materials categories to be achieved to give the greatest environmental benefits.

12.16 The development would exceed the BREEAM excellent 70% target (80.21%) and would also meet the energy, water and materials credits targets as required by the Council's CPG Energy Efficiency and Adaptation.

12.17 These targets would be secured through the S106 legal agreement.

13 AIR QUALITY

- 13.1 Camden Local Plan policy CC4 is relevant with regards to air quality. An Air Quality Assessment (AQA) has been submitted as part of this application which was assessed by the Council's Sustainability Officer.
- 13.2 The AQA included a desk study of local air quality which found that local air quality conditions are suitable for office use without further mitigation requirements. The applicant has stated that air filtration would be included as part of the development, however this is not necessary due to the current reasonable and improving good air quality levels and given it would result in reduced energy optimisation for the development as a whole. Details of filtration measures can be resolved by condition at a later date [Condition 17].
- 13.3 Emergency generators are proposed. Flues from the generators must be at least 1m above the height of the tallest building in a 20m radius. A condition [Condition 15] is attached requiring the flue to meet this requirement.
- 13.4 The proposals would be car free and the impact on local traffic activity would be negligible. Energy and hot water would be provided without the use of combustion plant. As such, the development would be neutral in terms of its transport and operational air quality impacts.
- 13.5 The Sustainability Officer has noted that there is a low risk from the development works with regard to general human health impacts and localised dust soiling. Air quality during demolition and construction would be managed through a detailed construction management plan, which will be required prior to commencement of works and is secured by S106 legal agreement as appropriate.

14 FLOOD RISK AND DRAINAGE

- 14.1 Policy CC3 is relevant with regards to flood risk and drainage. The site is located within a Flood Zone 1, which is an area that is least likely to flood. The site has a very low fluvial risk of flooding, medium surface water risk and low groundwater risk of flooding. The site is not on a previously flooded street or in a Local Flood Risk Zone.
- 14.2 The development would include sustainable drainage systems at roof level in the form of blue roofs and vegetated areas to minimise water run-off. An attenuation tank would also help with rainwater storage. Potable water use would be minimised and carefully monitored. Rainwater re-use and grey-water recycling is under consideration and further information on the adoption of such measures can be secured by conditions [Conditions 10 and 27].
- 14.3 These measures would improve drainage on the site by 74% to achieve a minimum of 76.3 l/s in a 1 in 100 rainfall event.
- 14.4 The Lead Local Flood Authority is happy with the proposals subject to conditions [Conditions 23 and 24] on SUDS and water efficiency. Given the above, the proposed measures are considered acceptable in terms of flood risk.

15 NATURE CONSERVATION, LANDSCAPE AND BIODIVERSITY

- 15.1 Camden Local Plan policies A2 and A3, and Camden CPG Biodiversity, seek to protect existing trees and secure additional tree planting and vegetation and to protect and promote biodiversity.

Trees and Landscaping

- 15.2 The site currently has a very poor natural ecology and low landscape quality. The site's roof is primarily used for plant equipment storage and other functional purposes and there are large areas of hardstanding around the site. The area in general suffers from an ecological deficiency, although there are some trees visible in the local area, notably on Brooke's Market.
- 15.3 No trees would be removed as part of the proposed development. The Council's Tree Officer has assessed the proposals and confirms that the high-value trees located off the site on Brooke's Market could be impacted upon during demolition and construction and should be protected and retained. Appropriate tree protection measures can be secured by conditions [Condition 20].
- 15.4 The development would not encroach upon Leather Lane or Brooke's Market thus retaining these areas as public spaces. The development's ground floor active uses would help increase passive surveillance over local open and public realm spaces thus improving the safety and usability of these areas.
- 15.5 The development would include several roof and terrace areas which would be secured as green and blue roofs where appropriate. Further details on the location and quality of these roofs, as well as general soft landscaping improvements on the upper levels, would be secured by conditions [Conditions 10 and 19].
- 15.6 Further conditions would also be included to secure details of appropriate biodiversity improvements, such as bird and bat boxes, and lighting controls [Conditions 21 and 22].
- 15.7 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms. The proposals would significantly enhance the natural value of the site.

16 TRANSPORT

- 16.1 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 16.2 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.
- 16.3 [Camden's Transport Strategy](#) (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets out objectives, policies, and measures for achieving this goal.

16.4 The Council's priorities include:

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

16.5 In 2022, the Council reviewed its progress so far on the CTS and also set out our delivery plan for the period covering 2022/23 - 2024/25. This was presented to [Cabinet on 14th December 2022](#). The plan includes commitments to:

- i. implement proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists via the Holborn Liveable Neighbourhood (HLN) scheme.
- ii. continue to expand our dockless bike and e-scooter hire network, and
- iii. expand significantly our Electric Vehicle Charging Point network.

16.6 Camden's [Clean Air Action Plan](#) and [Climate Action Plan](#) also contain policies which are relevant to our transport observations.

Site location and access to public transport

16.7 The site is located within the Hatton Garden Conservation Area to the north of Holborn (A40). The site is also bounded by Brooke Street to the west, Leather Lane to the east, Beauchamp Street to the north and Holborn to the South.

16.8 Holborn (A40) forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is also close to Farringdon Road, which is part of TfL's Transport for London Road Network (TLRN).

16.9 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). The closest London Underground stations to the site are Chancery Lane, located approximately 200m from Building 2 on A40 Holborn, Farringdon, located approximately 450m to the east of the site and Holborn located approximately 850m to the west of the site. Farringdon station also provides national rail and Elizabeth Line services. The closest bus stops to the site, Holborn Circus/Fetter Lane, are located on A40 Holborn adjacent to the site's southern boundary.

16.10 The site is accessible from the Strategic Cycle Network with Cycleway C6 to the east at Farringdon Road and C11 to the west at Red Lion Street. Both Cycleways link the site with Euston railway station. The nearest Santander cycle hire docking stations are located on Red Lion Street, Holborn Circus, New Fetter Lane, and Hatton Garden.

16.11 The Council is developing proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists. The estimated cost of delivering these proposals, which will be delivered under the Holborn

Liveable Neighbourhood (HLN) scheme is currently estimated as circa £40 million including fees, subject to detailed design. Under Objective 1 of the CTS, which is to “transform our streets and places to enable an increase in walking and cycling”, we have set out “investment priority” schemes – these being schemes which “identify priorities for this objective where we will require substantial additional funds, including inward investment & partnership in delivery from TfL/other relevant organisations, in the short to medium term, to help realise these overall goals.” One of those investment priorities is “Unravelling the Holborn gyratories and reducing traffic dominance as part of an area wide ‘Liveable Neighbourhood’ project that enables active travel modes.”

- 16.12 The Council will therefore seek to secure financial contributions towards the overall scheme costs from development funding. Construction of the HLN scheme will take place as funds become available. Implementation of some changes to roads in the area are likely to start in 2024 using secured funding, with each subsequent phase of construction subject to financial approval as funding becomes available.
- 16.13 There are dedicated parking bays for dockless rental e-bikes and rental e-scooters in the area, namely on Red Lion Street and Holborn Circus. However, these bays are already showing signs of overcapacity and increasing demand. The Council has plans to expand the network of bays in the area and it is hoped that additional bays could be provided in the future via developer contributions.

Trip generation

- 16.14 The proposed development is for an overall ‘modest’ uplift in floor space of 627 sqm (GIA) to provide 29,531 sqm office space and 322 sqm retail use.
- 16.15 The proposal would be a car free development which is acceptable given the excellent availability of public transport services in this area. As such, a significant proportion of trips are expected to be taken by foot, bicycle, or public transport.
- 16.16 The anticipated high volume of the walking trips is likely to be made from London Underground stations at Chancery Lane, Farringdon (which also provides rail services) and Holborn, and from the bus stops on Holborn Circus/Fetter Lane.
- 16.17 An Active Travel Zone (ATZ) assessment has been completed. The ATZ assessment identifies several opportunities for improvements to walking and cycling environment, as follows:
- widen the pedestrian refuge island, install guard railing and repair tactile paving to reduce trip hazards on Holborn near Chancery Lane station.
 - segregated cycle lanes on Red Lion Street.
 - yellow box or a signal-controlled junction at Red Lion Street/Holborn.
 - provide tactile paving on both sides of the crossing and reinstate dropped kerbs to remove a trip hazard for pedestrians on a section of Greville Street.
- 16.18 A financial contribution towards pedestrian, cycling and other environmental improvements in the local area would be secured through s106 legal agreement and some or all of these and other public realm improvements would be secured as part of that contribution.

Travel planning

- 16.19 A draft travel plan was not submitted in support of the planning application. A travel plan targeted towards staff and visitors, outlining aims and objectives, active travel targets, action plan and monitoring can be secured by legal agreement and a financial contribution towards this, associated monitoring and other measures of £11,221 will be secured by legal agreement if planning permission is granted.

Access and permeability

- 16.20 The site is accessible to pedestrians from the north, east, south, and west. Waterhouse Square includes a pedestrianised square, which connects to Leather Lane to the north. There is a one-way system between Brooke Street and Dorrington Street. Brooke Street to the west of the site provides a vehicular route with pavements on both sides.
- 16.21 The main pedestrian accesses would be from within the courtyard of Waterhouse Square, which exists at present, and a new entrance which is proposed directly onto Greville Street.
- 16.22 The proposal would remove the existing 11 car parking spaces. No changes are proposed to the site's vehicular access from Brooke's Street which would continue to be used for servicing activity.

Cycle parking

- 16.23 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1 CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5.
- 16.24 The proposed development would provide 422 long-stay cycle parking spaces at lower ground level, accessed via two cycle lifts and two sets of shallow stairs with wheeling ramps. Showers, lockers, changing rooms and drying facilities would be provided at the basement level, directly below the cycle store, accessed via stairs and lifts. There should be a minimum spacing of 1m between Sheffield stands, and 500mm between two-tier stands. The mix and quality of cycle parking shall be secured by condition [Condition 18].
- 16.25 35 short-stay cycle parking spaces will be provided, with 16 spaces for the office use located at ground floor level. The remaining 19 spaces cannot be sited within the site boundary and therefore the remaining short-stay spaces would be provided on the public highway at Brooke's Market or Beauchamp Street. As such, an off-site cycle parking contribution towards new on-street cycle parking of £6,000 would be secured by legal agreement.

Car parking and vehicle access

- 16.26 The site is within controlled parking zone CA-D (Kings Cross Area), which operates 08:30-18:30 Monday to Friday, 08:30-13:30 on Saturday, and not at all on Sunday.
- 16.27 Vehicular access to the site, including for service access, is from Brooke Street via A40 Holborn. The development would be car-free, which would be secured by legal agreement if planning permission were granted. The removal of 11 car parking spaces from the site is supported. However, no accessible parking space is provided

for disabled vehicle users. As such, an off-site contribution of £4,000 is required for the provision of a disabled parking space in order to support users of the development with accessible parking needs. This can be secured by legal agreement.

Construction management

- 16.28 Construction management plans (CMPs) help to minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft Construction/Demolition Management Plan using the Council's CMP pro-forma has been provided with the planning application.
- 16.29 The A40 forms part of the Strategic Road Network (SRN). Traffic congestion is a significant problem in this part of the borough, particularly during peak periods and at other times throughout the day on Monday to Friday. The proposal would potentially create some short-term amenity issues for local people such as noise/vibration, dust and a temporary loss of parking. The development must be implemented in a manner that is not excessively detrimental to local amenity or the safe and efficient operation of the highway network in the local area. As such, detailed Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents must be secured by legal agreement in accordance with Local Plan policy A1.
- 16.30 The development and assessment of the DMP/CMP, as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction, will require close scrutiny by the Council and as such implementation support contributions of £29,943 and impact bonds of £31,497 for all (demolition and construction) phases of the development works will be secured by s106 legal agreement.
- 16.31 Construction vehicle movements to and from the site must be scheduled to avoid peak periods to minimise the impacts of construction on the transport network and sensitive local receptors. St Alban's CE Primary School is located 80 metres from the site and pedestrian/vehicle movements during the morning and evening peak could also lead to avoidable impacts. As such, it will be necessary to restrict construction traffic to the hours of 9.30am and 3.00pm on weekdays. The site is within the Cumulative Impact Area (CIA) where Saturday working is not permitted, unless agreed in advance by the Council. This shall be secured as part of the DMP/CMP secured through s106 legal agreement.
- 16.32 Once appointed, the development contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety. These matters shall be secured as part of the DMP/CMP secured through s106 legal agreement.
- 16.33 Furthermore, a construction working group consisting of representatives from the local community must be set up prior to the commencement of demolition and construction works, and shall be required to meet regularly during the development process, which shall also be secured by legal agreement.

Deliveries and servicing

16.34 The Transport Assessment states that deliveries and servicing for the commercial aspect of the development will continue to be from the existing loading area on the ground floor, which will be reconfigured to provide three 8m bays. Further information is required regarding servicing arrangements for the office use. Servicing (including waste collections) and deliveries would not be permitted to occur on street.

16.35 A detailed delivery and servicing plan for all land uses would be secured by legal agreement which will ensure that any operational impacts associated with delivery and servicing movements will be mitigated.

Pedestrian, cycling, highway and other environmental improvements

16.36 Given that the site is located in Holborn a financial contribution of £50,000 towards the Holborn Liveable Neighbourhood (HLN) public realm improvements scheme is required from the development. This would be secured by legal agreement. In accordance with the Council's Transport Strategy (CTS) Delivery Plan a financial contribution of £20,000 would also be secured towards introducing segregated cycle lanes on Charterhouse Street. As such, a total contribution of £70,000 towards PCE improvements would be secured by s106 legal agreement.

16.37 The applicant is also required to provide a contribution towards improvements on Brooke's Market which are proposed as part of the draft Holborn Vision & Urban Strategy CPG. Works to Brooke's Market are expected to include high quality paving, bin storage and other measures. An appropriate financial contribution towards these public realm improvements will be secured through s106 legal agreement.

16.38 Parking bays for dockless rental e-bikes and rental e-scooters are available nearby. However, these are already well-used and increased demand for cycle parking bays would be expected as the result of this development. Staff and visitors would be likely to use these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by bus. As such, a cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured through legal agreement to allow the Council to provide additional capacity for rental e-bikes and e-scooters in the local area through the expansion of existing bays and the provision of additional bays.

16.39 The proposal would not require any physical alterations to the public highway. Damage to the public highway is possible during demolition and construction and therefore a modest highways contribution of £20,000 shall be secured by legal agreement to cover local highway improvements.

Conclusion

16.40 The proposed development is acceptable in terms of transport impact subject to conditions as described in the paragraphs above and the following planning obligations being secured by legal agreement:

- Travel Plan and associated monitoring and measures contribution of £11,221.
- Car-free development.
- Off-site contribution of £4,000 for a disabled parking space.

- Construction management plan (CMP), and if necessary, a separate Demolition Management Plan (DMP), CMP implementation support contribution of £29,943, and CMP Impact Bond of £31,497.
- Requirement to form a construction working group consisting of representatives from the local community.
- Delivery and Servicing Plan.
- Highway works contribution of £20,000.
- Pedestrian, Cycling and Environmental Improvements contribution £70,000 (including HLN scheme and cycle lane improvements).
- Brooke's Market public realm improvements contribution (£TBC).
- Micromobility improvements contribution of £10,000.
- Off-site cycle parking contribution of £6,000 for 10 short-stay cycle parking stands with a capacity of 20 spaces.

17 SAFETY AND SECURITY

- 17.1 Camden Local Plan policy C5 and CPG1 (Design) are relevant with regards to development security objectives.
- 17.2 The Designing Out Crime Officer was consulted prior to the application being submitted and was involved in the design process. This officer raised no objections to the proposals. The scheme has been designed in accordance with Secure by Design principles.
- 17.3 The proposed design would increase passive surveillance on local streets through increased pedestrian activity and active ground floor commercial uses. The development would include CCTV cameras and security staff would patrol main access points and other parts of the new building. Details of CCTV and security would be secured by condition [Condition 28]. As such, it is anticipated that the proposed development would help to reduce anti-social behaviour in the local area through these measures.
- 17.4 The new entrance off Leather Lane would be gated in the evenings in accordance with the gate management arrangements for the existing Waterhouse Square. This arrangement would also be secured by condition [Condition 28].

18 EMPLOYMENT AND TRAINING OPPORTUNITIES

- 18.1 The proposed development would be likely to generate increased employment opportunities during the construction phase, and as such, the Council aims to ensure that local people benefit from these opportunities by securing a package of employment and training obligations through a Section 106 legal agreement.
- 18.2 The employment and training package in line with the Employment, Sites and Business Premises CPG will cover the following:
- 18.3 Apprenticeships - The applicant must recruit 1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted

through the Council's King's Cross Construction Skills Centre. The applicants planning statement indicates that a minimum of one apprentice will be recruited.

- 18.4 Construction Work Experience Placements - The applicant should provide a minimum of one construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.
- 18.5 Local Recruitment – The Council's standard local recruitment target is 20%. The applicant should work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely.
- 18.6 Local Procurement – The applicant must also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. Our local procurement code sets a target of 10% of the total value of the construction contract.
- 18.7 The scheme results in a net increase of employment floorspace of 627sqm and therefore doesn't trigger the requirement set out in the CPG for occupation phase employment and skills obligations. The applicant has also agreed to secure other provisions relating to community and market trader access to retail spaces and other facilities as appropriate, with details to be secured through s106 legal agreement and confirmed at a later date.
- 18.8 Overall, the employment and training proposals would meet the aims and objectives of policies E1 and E2 of the Camden Local Plan.

19 PLANNING OBLIGATIONS

- 19.1 The following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms would mitigate any impact of the proposal on the infrastructure of the area.

Contribution	Amount (£)
Travel plan, monitoring and measures	£11,221
Short stay cycle parking	£6,000
Car free	n/a
Disabled parking space	£4,000
CMP implementation support	£29,943
Impact bond	£31,497
Highways	£20,000
Holborn Liveable Neighbourhood (part of PCE contribution)	£50,000
Cycle lanes (part of PCE contribution)	£20,000
Brooke's Market public realm	£TBC

Micromobility	£10,000
Construction working group	n/a
DSP	n/a
Energy plans & BREEAM	n/a
Mixed use/housing contribution	£470,250
Apprenticeships	£1,700 (1no. apprentice per £3m build costs = 1 x £1,700)
Employment and skills initiatives	<ul style="list-style-type: none"> • 20% local recruitment • Local procurement code (10% of build costs to be spend locally) • End user staff to be paid London Living Wage • End user apprenticeships • STEAM objectives • Community and market trader use of retail spaces and facilities including bathrooms/WC facilities

20 MAYOR OF LONDON'S CROSSRAIL CIL

20.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the addition of new office space. This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index. The current Mayoral CIL rates for this site (indexing not applied) are as follows:

- Office - £185 per sqm (Central London)
- Retail - £165 per sqm (Central London)
- All other Development - £80 per sqm (Band 1 – Camden)

20.2 The above calculation is based on today being the decision and is also based on the information provided with the application. The above is an estimate only and would be subject to the verification of the proposed floor areas and calculations by the Council's CIL team.

20.3 Should the applicant consider that any deductions apply to this calculation they will need to provide completed forms for relief along with any supporting evidence.

21 CAMDEN CIL

21.1 The proposal would be liable for the Camden Community Infrastructure Levy (CIL). CIL tariff for sites located within Central Camden (Zone A) are charged at the following rates:

- Office - £110 per m²
- Hotel - £110 per m²

- Retail - £32 per m²
- Residential (10 or more dwellings) - £193 per m²
- Other commercial uses - £32 per m²

22 CONCLUSION – PLANNING AND LISTED BUILDING CONSENT APPLICATIONS

- 22.1 The application is a commercial development for partial demolition of the existing building to provide additional Class E floor space intended for use as offices and retail space and a retail/bar unit in Class E/Sui Generis use. In total, the application proposes 29,853sqm of non-residential floorspace which includes an overall floorspace uplift of 627sqm.
- 22.2 The proposed land uses are similar to those already on the site and in the local area and would increase the density and quality of the office uses as well as providing ground floor uses that activate surrounding streets, increasing commercial and pedestrian activity, improving safety and security on local streets and ensuring the vitality and viability of the existing commercial frontages. The existing market on Leather Lane would be respected and the site's relationship with it would be enhanced. It is accepted that it is not possible to provide housing on site but a full financial contribution towards affordable housing would be provided in lieu.
- 22.3 The new building would partially demolish, refurbish and extend a recent extension of no noted architectural merit. It would be of a high quality with a limited increase in height and massing, well-considered articulation and finishing materials, and the provision of active ground floor frontages. The new building would respect key local views and would appropriately contrast with the listed building, and would thus not detract from the conservation area or the setting of the listed building. The works to the listed building, including the creation of two new entrances, would help retain the building in its optimum viable use as a commercial space and thus the low level of less than substantial harm that is created by these works would be outweighed by these public benefits. It is therefore considered that propose development would, on balance, preserve the Grade II* listed Waterhouse Square, and would also preserve its setting and the character and appearance of the Hatton Garden Conservation Area..
- 22.4 The proposal would have high-quality architecture demonstrated through its well-considered composition and detailing and thus would significantly improve the experience of the urban block from the street and would enhance the public realm around the site. The design creates an open, publicly accessible, commercial ground plane with active ground floor frontages that would improve the safety and security of, and bring life to, local streets.
- 22.5 The scheme has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight, outlook, privacy, and in terms of preventing additional noise disturbance.
- 22.6 The proposed development would involve the partial demolition, refurbishment and extension of the existing extension on-site. 83% of the volume of the existing extension would be retained and the development would have a substantial carbon saving across the lifetime of the development compared to alternative refurbishment

options due to its very low energy demand. The development would also be car free would make the best use of the site in an accessible location. Officers are satisfied with the proposed development in terms of sustainability and energy use.

22.7 The building phase of the proposed development would be required to adhere to a detailed construction management plan to protect the amenity of nearby residents and would also provide financial contributions towards local public realm improvements.

22.8 As such, it is recommended that planning permission and listed building consent is granted subject to conditions and a Section 106 legal agreement.

23 RECOMMENDATIONS

23.1 Planning Permission is recommended to be granted subject to conditions and a Section 106 Legal Agreement covering the aforementioned Heads of Terms.

23.2 Listed building consent is recommended to be granted subject to conditions.

24 LEGAL COMMENTS

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

Waterhouse Square list of conditions

25 CONDITIONS – PLANNING APPLICATION

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing Plans and Drawings (all Rev. C01 unless specified): WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan WHS-ORM-2W-04-DR-A-12504 Existing General Arrangement Fourth Floor Plan WHS-ORM-2W-05-DR-A-12505 Existing General Arrangement Fifth Floor Plan WHS-ORM-2W-06-DR-A-12506 Existing General Arrangement Sixth Floor Plan WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation</p> <p>Proposed Plans and Drawings (all Rev. C01 unless specified): WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan WHS-ORM-2W-00-DR-A-12600 Proposed Demolition Ground Floor Plan WHS-ORM-2W-00-DR-A-12700 (Rev. C02) Proposed General Arrangement Ground Floor Plan = WHS-ORM-2W-01-DR-A-12601 Proposed Demolition First Floor Plan</p>

WHS-ORM-2W-01-DR-A-12701 (Rev. C02) Proposed General Arrangement First Floor Plan
WHS-ORM-2W-02-DR-A-12602 Proposed Demolition Second Floor Plan
WHS-ORM-2W-02-DR-A-12702 (Rev. C02) Proposed General Arrangement Second Floor Plan
WHS-ORM-2W-03-DR-A-12603 Proposed Demolition Third Floor Plan
WHS-ORM-2W-03-DR-A-12703 (Rev. C02) Proposed General Arrangement Third Floor Plan
WHS-ORM-2W-04-DR-A-12604 Proposed Demolition Fourth Floor Plan
WHS-ORM-2W-04-DR-A-12704 (Rev. C02) Proposed General Arrangement Fourth Floor Plan
WHS-ORM-2W-05-DR-A-12605 Proposed Demolition Fifth Floor Plan
WHS-ORM-2W-05-DR-A-12705 (Rev. C02) Proposed General Arrangement Fifth Floor Plan
WHS-ORM-2W-06-DR-A-12606 Proposed Demolition Sixth Floor Plan
WHS-ORM-2W-06-DR-A-12706 (Rev. C02) Proposed General Arrangement Sixth Floor Plan
WHS-ORM-2W-07-DR-A-12707 (Rev. C02) Proposed General Arrangement Seventh Floor Plan
WHS-ORM-2W-AA-DR-A-12140 Proposed Planning Section A-A
WHS-ORM-2W-B1-DR-A-12699 Proposed Demolition Basement 1 Plan
WHS-ORM-2W-B1-DR-A-12799 (Rev. C02) Proposed General Arrangement Basement 1 Plan
WHS-ORM-2W-BB-DR-A-12141 Proposed Planning Section B-B
WHS-ORM-2W-CC-DR-A-12142 Proposed Planning Section C-C
WHS-ORM-2W-DD-DR-A-12143 Proposed Planning Section D-D
WHS-ORM-2W-EA-DR-A-12349 Proposed Planning Bay Study 10
WHS-ORM-2W-EA-DR-A-12350 Proposed Planning Bay Study 11
WHS-ORM-2W-EA-DR-A-12351 Proposed Planning Bay Study 12
WHS-ORM-2W-EA-DR-A-12352 Proposed Planning Bay Study 13
WHS-ORM-2W-EA-DR-A-12372 Proposed Planning R7 Heritage Block East Facade
WHS-ORM-2W-EE-DR-A-12144 Proposed Planning Section E-E
WHS-ORM-2W-LG-DR-A-12698 Proposed Demolition Lower Ground Floor Plan
WHS-ORM-2W-LG-DR-A-12798 (Rev. C02) Proposed General Arrangement Lower Ground Floor Plan
WHS-ORM-2W-NO-DR-A-12330 Proposed Planning North Elevation
WHS-ORM-2W-NO-DR-A-12340 Proposed Planning Bay Study 01
WHS-ORM-2W-NO-DR-A-12341 Proposed Planning Bay Study 02
WHS-ORM-2W-NO-DR-A-12342 Proposed Planning Bay Study 03
WHS-ORM-2W-NO-DR-A-12343 Proposed Planning Bay Study 04
WHS-ORM-2W-NO-DR-A-12344 Proposed Planning Bay Study 05
WHS-ORM-2W-NO-DR-A-12345 Proposed Planning Bay Study 06
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	<p>WHS-ORM-2W-SO-DR-A-12353 Proposed Planning Bay Study 14 WHS-ORM-2W-SO-DR-A-12370 Proposed Planning R6 Heritage Block South Facade WHS-ORM-2W-WE-DR-A-12333 Proposed Planning West Elevation WHS-ORM-2W-WE-DR-A-12354 Proposed Planning Bay Study 15 WHS-ORM-2W-WE-DR-A-12355 Proposed Planning Bay Study 16 WHS-ORM-2W-ZZ-DR-A-12360 Proposed Planning Entrance Elevations</p> <p>Supporting Documentation: Design and Access Statement, and Townscape Assessment (July 2023) Planning Statement (November 2023) Planning Report (July 2023) Noise Impact Assessment (July 2023) Sustainability Statement (August 2023) Daylight, Sunlight and Overshadowing Report (July 2023) Construction/Demolition Management Plan (July 2023) Transport Assessment (July 2023) Heritage Assessment (July 2023) Statement of Community Involvement (August 2023) Operational Waste Management Strategy (July 2023) Drainage Strategy Report (October 2023) Air Quality Assessment (October 2023) Active Travel Zone Assessment Technical Note (November 2023) Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Matching materials</p> <p>All new external work to the listed parts of 2 Waterhouse Square shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p>Detailed drawings/samples</p> <p>Prior to commencement of development (with the exception of demolition, 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:</p> <ul style="list-style-type: none"> a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors and canopies b) Plan, elevation and section drawings, of all ground floor facades at a scale of 1:10; c) Typical plan, elevation and section drawings of balustrading to terraces and balconies; d) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and sample panels at a minimum of 1mx1m of those materials (to be provided on site). e) Details of cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof terrace levels;

	<p>f) Typical elevation (minimum 2m x 2m in size) of each building including a glazed opening showing reveal and header detail and facing materials</p> <p>g) Details of relevant gates, railings, doors and louvres on all parts of the building which face the public realm.</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works for the relevant building.</p> <p>Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
5	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the Council.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of Camden Local Plan policies D1 and D2.</p>
6	<p>Hours of Use – Commercial Uses</p> <p>The ground floor uses hereby permitted shall not be carried out outside the following times:</p> <p>08:00 to 23:00 Mondays to Saturdays and 08:00 to 22:00 on Sundays and Bank Holidays.</p> <p>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.</p>
7	<p>House of Use – Terraces</p> <p>The external terraces for the proposed Class E use as shown on the approved drawings shall not be used outside of 08.00 to 21.00 hours Mondays to Saturdays.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies D1, A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
8	<p>Carbon reductions</p> <p>(a) Prior to commencement of development (with the exception of demolition) the development hereby approved shall submit an energy statement to the Local Planning Authority to be approved in writing demonstrating how reductions in carbon dioxide emissions at 'Be Green' have been maximised</p>

	<p>and a minimum 49.6% reduction in beyond Part L 2021 Building Regulations in line with the energy hierarchy has been achieved.</p> <p>(b) Prior to first occupation of the development hereby approved evidence demonstrating that the approved measures have been implemented shall be submitted to and approved in writing by the Local Planning Authority and these measures shall be retained and maintained for the lifetime of the development.</p> <p>Reason: To ensure the development contributes to minimising the effects of and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan 2017.</p>
9	<p>Solar PV panels</p> <p>Prior to commencement of development (with the exception of demolition), drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall 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 roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
10	<p>PVs and green/blue roof co-location</p> <p>Prior to commencement of development (with the exception of demolition), a feasibility assessment with the aim of maximising the provision of solar photovoltaics and green and blue roofs should be submitted to the local planning authority and approved in writing. The building shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities and 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.</p>
11	<p>Resource and waste management</p> <p>Prior to commencement of development, a resource and waste management plan shall be submitted to and agreed in writing by the local planning authority. This shall include a pre-demolition audit and shall demonstrate how a minimum of 95% of construction and demolition waste will be reused/recycled/recovered. The development shall thereafter be delivered in accordance with the approved details.</p> <p>Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan 2017.</p>

12	<p>Non-road mobile machinery</p> <p>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).</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.</p>
13	<p>Plant noise</p> <p>The external noise levels emitted from plant, machinery and/or equipment shall ensure that the rating level of the noise emitted from the proposed installation located at the site shall not exceed the existing background level at any noise sensitive premises when measured and corrected in accordance with BS4142:2014 +A1:2019 "Methods for rating and assessing industrial and commercial sound." with all machinery operating together at maximum capacity.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
14	<p>Anti-vibration</p> <p>Prior to their first use and machinery, plant or equipment required for the development hereby approved 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 thereafter.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
15	<p>Back-up generators</p> <p>Prior to commencement of development (with the exception of demolition) the details of the proposed Emergency Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, with alternatives to diesel or oil fully considered and testing minimised. The flue from the generators shall be at least 1 metre above the height of the tallest building in a 20m radius. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications. 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.</p>

	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.
16	<p>Emergency plant</p> <p>Noise emitted from the emergency plant and generators hereby permitted shall not increase the minimum assessed background noise level (expressed as the lowest 24-hour LA90, 15 mins) by more than 10 dB one metre outside any premises, and shall be operated only for essential testing, except when required due to an emergency loss of power. Testing of the emergency plant and generators hereby permitted may be carried out for up to one hour only in a calendar month, and only during the hours 09.00 to 17.00 hrs Monday to Friday and not at all on public holidays.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
17	<p>Mechanical Ventilation</p> <p>Prior to commencement of development (with the exception of demolition) the full details of the mechanical ventilation system including air inlet locations and confirmation of any filtration measures shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan 2017 Policy CC4.</p>
18	<p>Cycle parking</p> <p>Prior to the commencement of development (with the exception of demolition) the details of the bicycle parking layout and access arrangements for the development hereby approved shall be submitted to the Local Planning Authority for its written approval. The following bicycle parking spaces and arrangements shall be shown:</p> <ul style="list-style-type: none"> • 422 long-stay and 16 short-stay spaces at ground and lower ground level • Details of stands which should include a mix of Sheffield and two-tier stands and spaces for larger cycles to be parked • Minimum spacing of 1m between Sheffield stands and 500mm between two-tier stands • Locations of showers, lockers, changing and drying facilities • Lift, door, wheeling ramp and other access arrangement details <p>The approved facilities shall be provided in their entirety prior to first occupation of the development and thereafter be permanently maintained and retained.</p>

	Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Camden Local Plan policies T1 and T2, and CPG Transport.
19	<p>Landscaped areas</p> <p>No development (with the exception of demolition) the shall take place until full details of hard and soft landscaping of all terrace areas within the development have been submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the approved details and maintained as such thereafter.</p> <p>Any trees or areas of planting within the development site which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
20	<p>Tree Protection Strategy</p> <p>Prior to the commencement of any works on site details demonstrating how trees to be retained in the local area shall be protected during construction work shall be submitted to and approved by the local planning authority in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees near to the site shall be retained and protected from damage in accordance with the approved tree protection details.</p> <p>Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the London Borough of Camden Local Plan 2017.</p>
21	<p>Bird and bat boxes</p> <p>Prior to commencement of development (with the exception of demolition), a plan detailing bird and bat box locations and types shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter permanently retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan and policy A3 of the Camden Local Plan 2017.</p>

22	<p>Lighting</p> <p>Prior to the commencement of development (with the exception of demolition) details of the proposed lighting scheme, to include a lux levels plan, shall be submitted to and approved in writing by the Local Planning Authority. The approved lighting scheme and mitigation measures should be implemented in accordance with the approved details prior to occupation and retained and maintained as such thereafter.</p> <p>Reason: In the interest of ecology, visual amenity and promoting a safe and secure environment in accordance with policies A1, A2, A3 and C5 of the Camden Local Plan 2017.</p>
23	<p>SuDS: Construction in accordance with details</p> <p>The sustainable drainage system as approved in Drainage Strategy Report, Rev. 05 November 2023 by Heyne Tillett Steel 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 76.3 l/s run-off rates in a 1:100 year storm with a 40% provision for climate change (74% betterment in existing run-off rates). The system shall include volumes of at least 355.89m³ of blue roofs and an attenuation tank of 74.6m³ as stated in the approved document and drawings and shall thereafter be retained and maintained in accordance with the approved maintenance plan.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.</p>
24	<p>SuDS: Evidence of installation</p> <p>Prior to occupation, evidence that the system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan by a named maintenance owner.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.</p>
25	<p>Secured by Design</p> <p>Prior to commencement of development (with the exception of demolition) evidence shall be submitted to the Local Planning Authority to be agreed in writing demonstrating the ability of the plans to meet secured by design accreditation, or justification submitted in any respect where the accreditation requirements cannot be met. Secured by design measures shall be implemented in accordance with the relevant accreditation achieved for the</p>

	<p>development prior to first occupation and the measures maintained in accordance with the approved details.</p> <p>Reason: To ensure the proposals are safe and secure in accordance with policy C5 of the Camden Local Plan 2017.</p>
26	<p>Air Source Heat Pumps</p> <p>Prior to commencement of development (with the exception of 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) and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
27	<p>Rain/greywater harvesting</p> <p>Prior to commencement of development (with the exception of demolition) a feasibility assessment for rainwater/greywater recycling should be submitted to and approved in writing by the local planning authority. If considered feasible, details shall be submitted to the local authority and approved in writing prior to the commencement of above ground works. The development shall thereafter be constructed in accordance with the approved details.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan 2017.</p>
28	<p>CCTV and security measures</p> <p>Prior to commencement of development (with the exception of demolition) details of locations and management of CCTV cameras at entrances to the development and around the building works hereby approved shall be submitted to the Local Planning Authority for its written approval. Details shall also be submitted of the design, siting, hours of opening/closing and other relevant management arrangements for gates to new entrances that form part of the development hereby approved. Once agreed in writing, the development shall thereafter be constructed and managed in accordance with the approved details.</p>

	Reason: To ensure the development is well-designed and is safe and secure in accordance with policies A1 and C5 of the Camden Local Plan 2017.
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26 INFORMATIVES – PLANNING APPLICATION

1	<p>Legal agreement</p> <p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
2	<p>CIL</p> <p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</p>
2	<p>Non-road mobile machinery</p> <p>Non-road mobile machinery (NRMM) is any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The Emissions requirements are only applicable to NRMM that is powered by diesel, including diesel hybrids. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit "http://nrmm.london/".</p>
3	<p>Air Quality</p> <p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>
4	<p>Construction Management</p> <p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>
5	<p>Public highway</p> <p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and</p>

	<p>suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
6	<p>Building regulations</p> <p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
7	<p>Noise controls</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. Further restrictions to these times may be required by the approved Demolition/Construction Management Plans. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.</p>

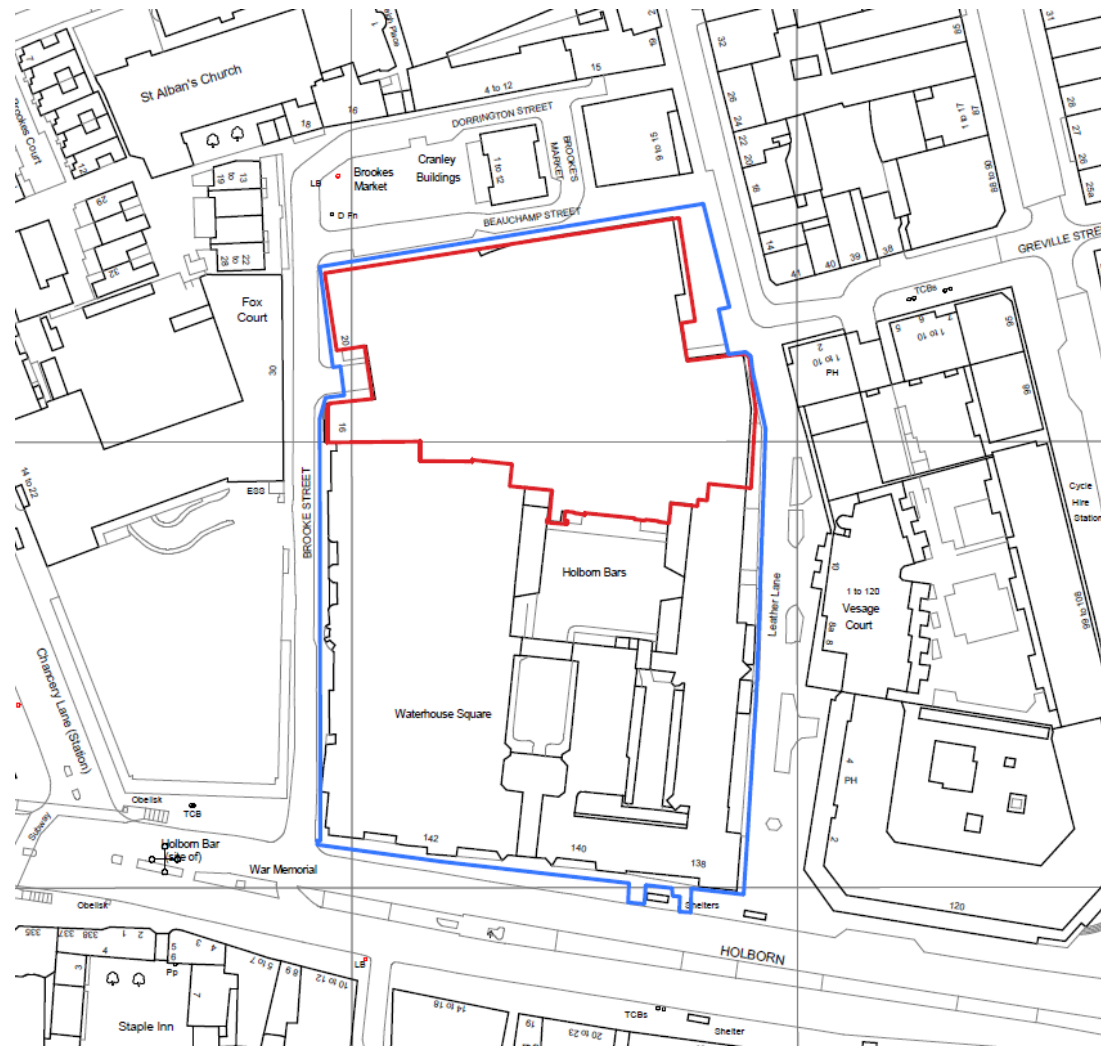
27 CONDITIONS – LISTED BUILDING CONSENT

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing Plans and Drawings (all Rev. C01 unless specified): WHS-ORM-2W-00-DR-A-12500 Existing General Arrangement Ground Floor Plan WHS-ORM-2W-01-DR-A-12501 Existing General Arrangement First Floor Plan WHS-ORM-2W-02-DR-A-12502 Existing General Arrangement Second Floor Plan WHS-ORM-2W-03-DR-A-12503 Existing General Arrangement Third Floor Plan WHS-ORM-2W-04-DR-A-12504 Existing General Arrangement Fourth Floor Plan WHS-ORM-2W-05-DR-A-12505 Existing General Arrangement Fifth Floor Plan WHS-ORM-2W-06-DR-A-12506 Existing General Arrangement Sixth Floor Plan WHS-ORM-2W-07-DR-A-12507 Existing General Arrangement Roof Plan WHS-ORM-2W-AA-DR-A-12100 Existing Planning Section A-A WHS-ORM-2W-B1-DR-A-12599 Existing General Arrangement Basement Floor Plan WHS-ORM-2W-BB-DR-A-12101 Existing Planning Section B-B WHS-ORM-2W-CC-DR-A-12102 Existing Planning Section C-C WHS-ORM-2W-DD-DR-A-12103 Existing Planning Section D-D WHS-ORM-2W-EA-DR-A-12311 Existing Planning East Elevation WHS-ORM-2W-EE-DR-A-12104 Existing Planning Section E-E WHS-ORM-2W-LG-DR-A-12598 Existing General Arrangement Lower Ground Floor Plan WHS-ORM-2W-NO-DR-A-12310 Existing Planning North Elevation WHS-ORM-2W-SO-DR-A-12312 Existing Planning South Elevation WHS-ORM-2W-WE-DR-A-12313 Existing Planning West Elevation</p> <p>Proposed Plans and Drawings (all Rev. C01 unless specified): WHS-ORM-2W-00-DR-A-12001 Proposed Planning Site Location Plan WHS-ORM-2W-00-DR-A-12600 Proposed Demolition Ground Floor Plan WHS-ORM-2W-00-DR-A-12700 (Rev. C02) Proposed General Arrangement Ground Floor Plan = WHS-ORM-2W-01-DR-A-12601 Proposed Demolition First Floor Plan WHS-ORM-2W-01-DR-A-12701 (Rev. C02) Proposed General Arrangement First Floor Plan</p>

WHS-ORM-2W-02-DR-A-12602 Proposed Demolition Second Floor Plan
WHS-ORM-2W-02-DR-A-12702 (Rev. C02) Proposed General Arrangement Second Floor Plan
WHS-ORM-2W-03-DR-A-12603 Proposed Demolition Third Floor Plan
WHS-ORM-2W-03-DR-A-12703 (Rev. C02) Proposed General Arrangement Third Floor Plan
WHS-ORM-2W-04-DR-A-12604 Proposed Demolition Fourth Floor Plan
WHS-ORM-2W-04-DR-A-12704 (Rev. C02) Proposed General Arrangement Fourth Floor Plan
WHS-ORM-2W-05-DR-A-12605 Proposed Demolition Fifth Floor Plan
WHS-ORM-2W-05-DR-A-12705 (Rev. C02) Proposed General Arrangement Fifth Floor Plan
WHS-ORM-2W-06-DR-A-12606 Proposed Demolition Sixth Floor Plan
WHS-ORM-2W-06-DR-A-12706 (Rev. C02) Proposed General Arrangement Sixth Floor Plan
WHS-ORM-2W-07-DR-A-12707 (Rev. C02) Proposed General Arrangement Seventh Floor Plan
WHS-ORM-2W-AA-DR-A-12140 Proposed Planning Section A-A
WHS-ORM-2W-B1-DR-A-12699 Proposed Demolition Basement 1 Plan
WHS-ORM-2W-B1-DR-A-12799 (Rev. C02) Proposed General Arrangement Basement 1 Plan
WHS-ORM-2W-BB-DR-A-12141 Proposed Planning Section B-B
WHS-ORM-2W-CC-DR-A-12142 Proposed Planning Section C-C
WHS-ORM-2W-DD-DR-A-12143 Proposed Planning Section D-D
WHS-ORM-2W-EA-DR-A-12349 Proposed Planning Bay Study 10
WHS-ORM-2W-EA-DR-A-12350 Proposed Planning Bay Study 11
WHS-ORM-2W-EA-DR-A-12351 Proposed Planning Bay Study 12
WHS-ORM-2W-EA-DR-A-12352 Proposed Planning Bay Study 13
WHS-ORM-2W-EA-DR-A-12372 Proposed Planning R7 Heritage Block East Facade
WHS-ORM-2W-EE-DR-A-12144 Proposed Planning Section E-E
WHS-ORM-2W-LG-DR-A-12698 Proposed Demolition Lower Ground Floor Plan
WHS-ORM-2W-LG-DR-A-12798 (Rev. C02) Proposed General Arrangement Lower Ground Floor Plan
WHS-ORM-2W-NO-DR-A-12330 Proposed Planning North Elevation
WHS-ORM-2W-NO-DR-A-12340 Proposed Planning Bay Study 01
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WHS-ORM-2W-SO-DR-A-12353 Proposed Planning Bay Study 14

	<p>WHS-ORM-2W-SO-DR-A-12370 Proposed Planning R6 Heritage Block South Facade WHS-ORM-2W-WE-DR-A-12333 Proposed Planning West Elevation WHS-ORM-2W-WE-DR-A-12354 Proposed Planning Bay Study 15 WHS-ORM-2W-WE-DR-A-12355 Proposed Planning Bay Study 16 WHS-ORM-2W-ZZ-DR-A-12360 Proposed Planning Entrance Elevations</p> <p>Supporting Documentation: Design and Access Statement, and Townscape Assessment (July 2023) Planning Statement (November 2023) Planning Report (July 2023) Noise Impact Assessment (July 2023) Sustainability Statement (August 2023) Daylight, Sunlight and Overshadowing Report (July 2023) Construction/Demolition Management Plan (July 2023) Transport Assessment (July 2023) Heritage Assessment (July 2023) Statement of Community Involvement (August 2023) Operational Waste Management Strategy (July 2023) Drainage Strategy Report (October 2023) Air Quality Assessment (October 2023) Active Travel Zone Assessment Technical Note (November 2023) Reason: For the avoidance of doubt and in the interest of proper planning.</p>
5	<p>Detailed drawings/samples</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following elements of the works to the listed building, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <ul style="list-style-type: none"> a) Details of all proposed new architectural features including cornices, skirtings, fireplaces and surrounds b) Plan, elevation and section drawings of all new internal doors at a scale of 1:10 with typical moulding and architrave details at a scale of 1:1. c) Plan, elevation and section drawings, including jambs, head and cill, of all proposed new and replacement external window and door openings. d) Plan, elevation and section drawings of all new windows at a scale of 1:10 with typical glazing bar details at 1:1. A schedule is required showing window design, details, and opening mechanism for traditional sash casements. e) Details of any proposed new roof finishes and proposed rainwater goods. <p>Reason: To safeguard the historic appearance and character of the building in accordance with the requirements of Camden Local Plan 2017 Policy D2.</p>
6	<p>Method Statement</p> <p>A method statement of any external repairs including repointing shall be submitted to and approved by the Local Planning Authority prior to commencement of such works.</p>

	Reason: To safeguard the historic appearance and character of the building in accordance with the requirements of Camden Local Plan 2017 Policy D2.
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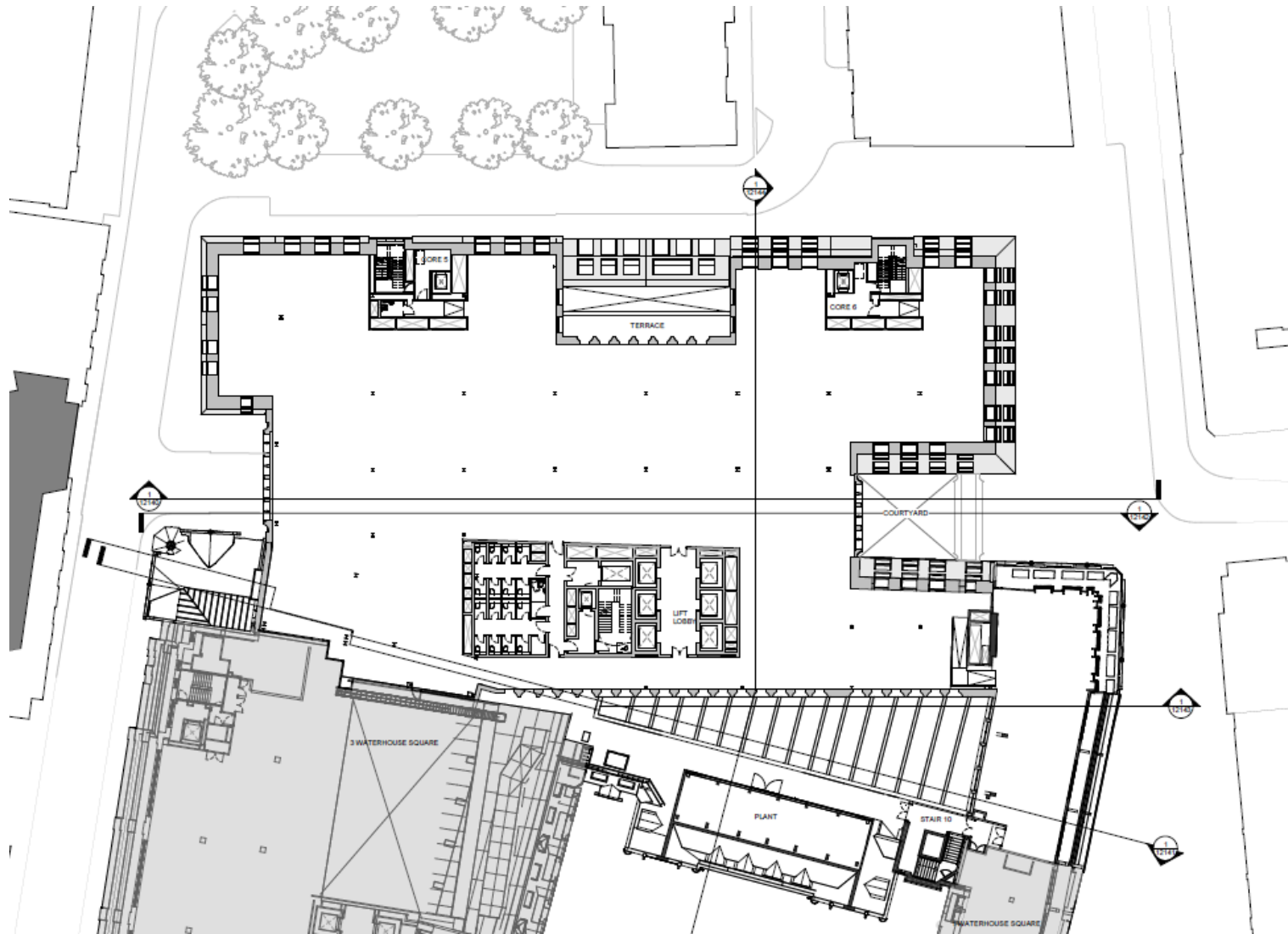


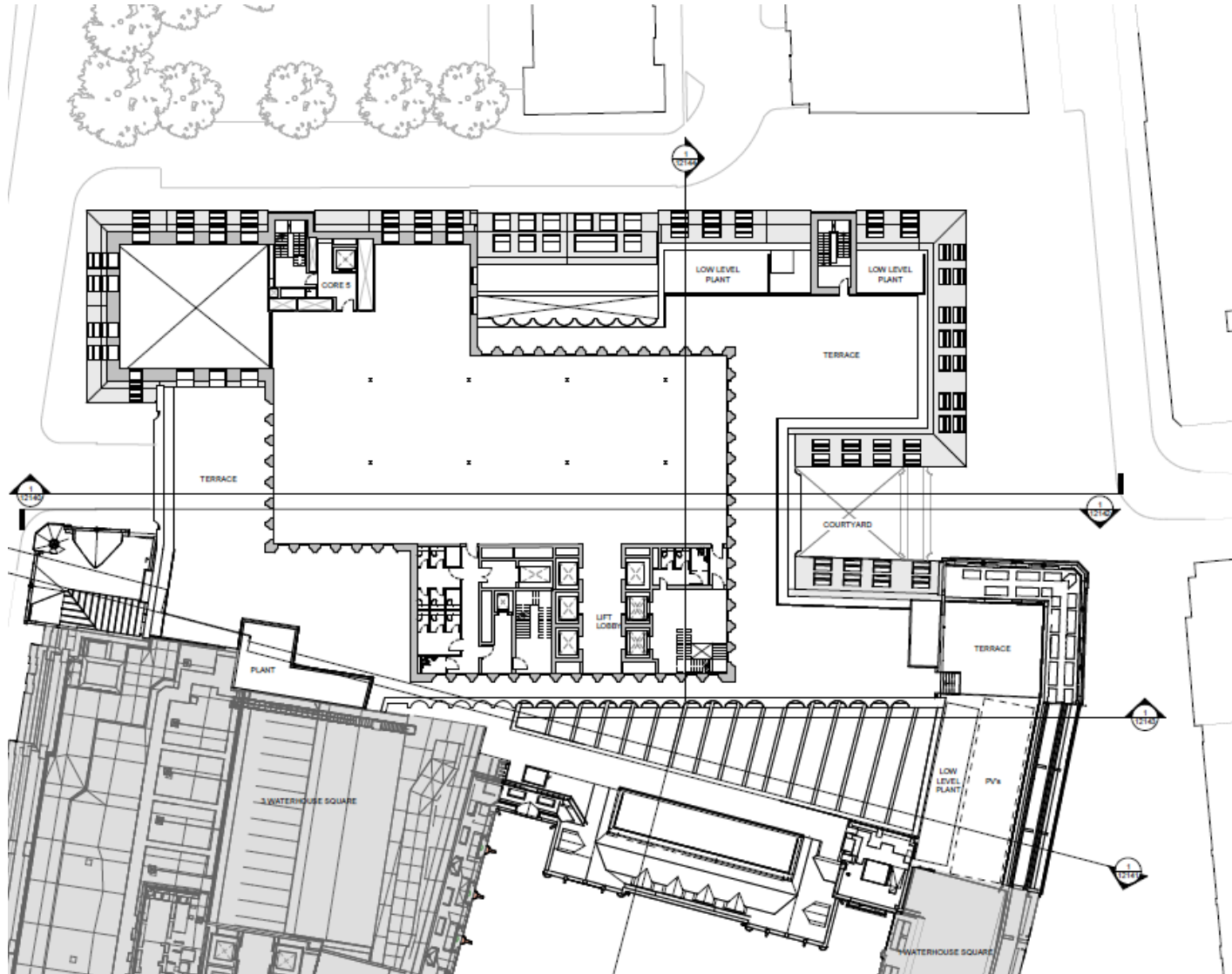


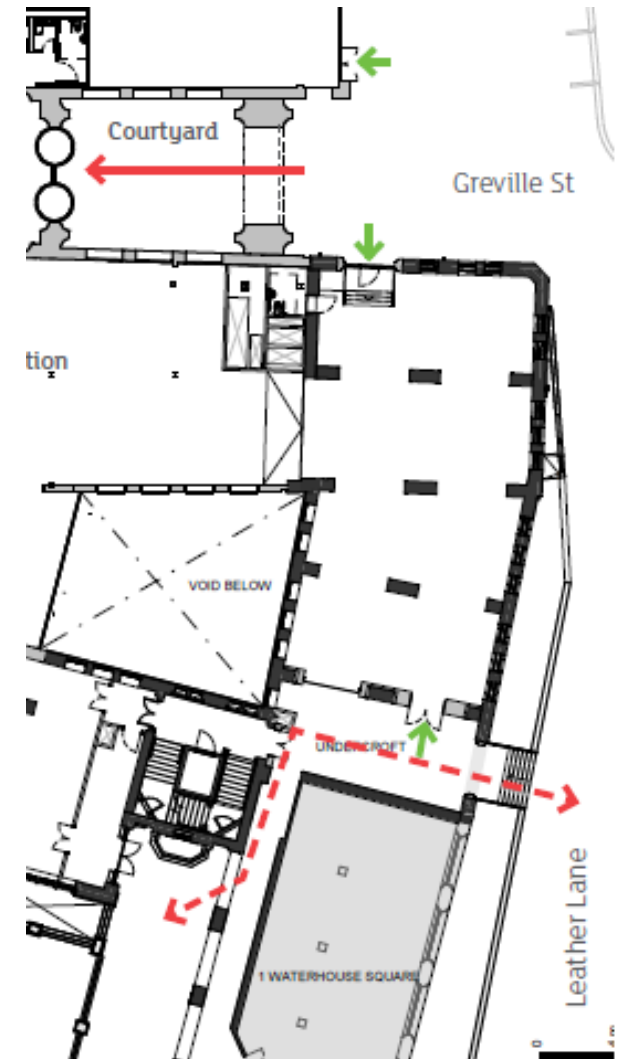
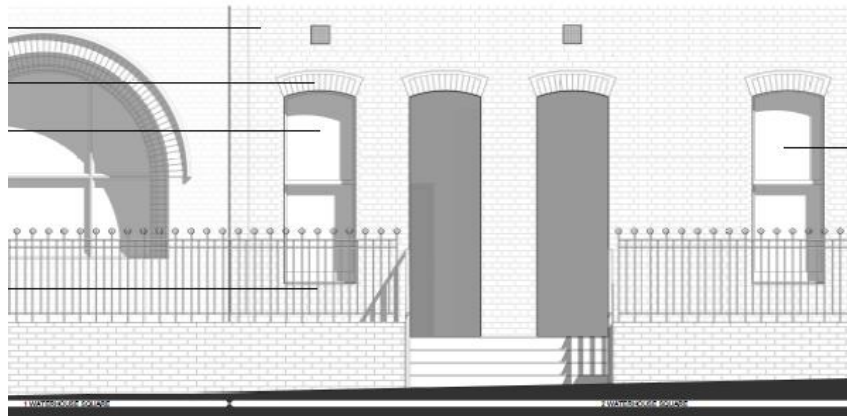
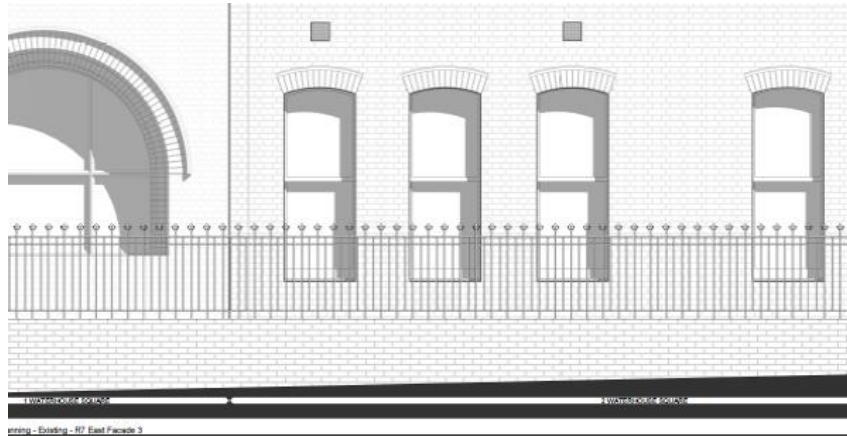












83% of existing structure
volume retained

