Address:	**Euston Tower** **286 Euston Road** **London** **NW1 3DP**		**1**
Application Numbers:	2023/5240/P	**Officer: David Fowler**	
Ward:	Regent's Park		
Date Received:	11/12/2023		

Proposal: Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work.

Background Papers, Supporting Documents and Drawing Numbers:

Site Plans
ET-DR-A-1002 - Site Location Plan - P2
ET-DR-A-1003 - Site Location Plan - Split By Level - P2
ET-DR-A-0000 - Site Plan - Existing - P2
ET-DR-A-1001 - Site Plan - Proposed - P2

Site Elevations
ET-DR-A-0010 - South Site Elevation - Existing - P1
ET-DR-A-0011 - East Site Elevation - Existing - P1
ET-DR-A-1010 - South Site Elevation - Proposed - P3
ET-DR-A-1011 - East Site Elevation - Proposed - P3

CIL Phasing Plans
ET-DR-A-1049 - CIL Phasing Plan Phase 0 - Substation Works - P1
ET-DR-A-1050 - CIL Phasing Plan Phase 1 - Deconstruction - P2
ET-DR-A-1051 - CIL Phasing Plan Phase 2 - Construction - P2

Floor Plans - Existing
ET-DR-A-00099 - Level Basement 01 Plan - Existing - P2
ET-DR-A-00100 - Level 00 Floor Plan - Existing - P2
ET-DR-A-00101 - Level 01 Floor Plan - Existing - P1
ET-DR-A-00102 - Level 02 Floor Plan - Existing - P1
ET-DR-A-00103 - Level 03 Floor Plan - Existing - P1
ET-DR-A-00104 - Level 04 Floor Plan - Existing - P1
ET-DR-A-00105 - Level 05 Floor Plan - Existing - P1
ET-DR-A-00106 - Level 06 Floor Plan - Existing - P1
ET-DR-A-00107 - Level 07 Floor Plan - Existing - P1

ET-DR-A-00108 - Level 08 Floor Plan - Existing - P1
ET-DR-A-00109 - Level 09 Floor Plan - Existing - P1
ET-DR-A-00110 - Level 10 Floor Plan - Existing - P1
ET-DR-A-00111 - Level 11 Floor Plan - Existing - P1
ET-DR-A-00112 - Level 12 Floor Plan - Existing - P1
ET-DR-A-00113 - Level 13 Floor Plan - Existing - P1
ET-DR-A-00114 - Level 14 Floor Plan - Existing - P1
ET-DR-A-00115 - Level 15 Floor Plan - Existing - P1
ET-DR-A-00116 - Level 16 Floor Plan - Existing - P1
ET-DR-A-00117 - Level 17 Floor Plan - Existing - P1
ET-DR-A-00118 - Level 18 Floor Plan - Existing - P1
ET-DR-A-00119 - Level 19 Floor Plan - Existing - P1
ET-DR-A-00120 - Level 20 Floor Plan - Existing - P1
ET-DR-A-00121 - Level 21 Floor Plan - Existing - P1
ET-DR-A-00122 - Level 22 Floor Plan - Existing - P1
ET-DR-A-00123 - Level 23 Floor Plan - Existing - P1
ET-DR-A-00124 - Level 24 Floor Plan - Existing - P1
ET-DR-A-00125 - Level 25 Floor Plan - Existing - P1
ET-DR-A-00126 - Level 26 Floor Plan - Existing - P1
ET-DR-A-00127 - Level 27 Floor Plan - Existing - P1
ET-DR-A-00128 - Level 28 Floor Plan - Existing - P1
ET-DR-A-00129 - Level 29 Floor Plan - Existing - P1
ET-DR-A-00130 - Level 30 Floor Plan - Existing - P1
ET-DR-A-00131 - Level 31 Floor Plan - Existing - P1
ET-DR-A-00132 - Level 32 Floor Plan - Existing - P1
ET-DR-A-00133 - Level 33 Floor Plan - Existing - P1
ET-DR-A-00134 - Level 34 Floor Plan - Existing - P1
ET-DR-A-00135 - Level 35 Floor Plan - Existing - P1
ET-DR-A-00136 - Level 36 Floor Plan - Existing - P1
ET-DR-A-00137 - Roof Plan - Existing - P1

Elevations - Existing
ET-DR-A-00200 - North Elevation - Existing - P1
ET-DR-A-00201 - South Elevation - Existing - P1
ET-DR-A-00202 - East Elevation - Existing - P1
ET-DR-A-00203 - West Elevation - Existing - P1
ET-DR-A-00300 - North Elevation Illustrative - Existing - P1
ET-DR-A-00301 - South Elevation Illustrative - Existing - P1
ET-DR-A-00302 - East Elevation Illustrative - Existing - P1
ET-DR-A-00303 - West Elevation Illustrative - Existing - P1

Sections - Existing
ET-DR-A-00310 - Section A-A - Existing - P1
ET-DR-A-00311 - Section B-B - Existing - P1

Floor Plans - Proposed
ET-DR-A-20098 - Level Basement 02 Plan - Proposed - P2
ET-DR-A-20099 - Level Basement 01 Plan - Proposed - P2
ET-DR-A-20100 - Level 00 Floor Plan - Proposed - P3
ET-DR-A-20101 - Level 01 Floor Plan - Proposed - P3
ET-DR-A-20102 - Level 02 Floor Plan - Proposed - P3

ET-DR-A-20103 - Level 03 Floor Plan - Proposed - P3
ET-DR-A-20104 - Level 04 Floor Plan - Proposed - P3
ET-DR-A-20105 - Level 05 Floor Plan - Proposed - P3
ET-DR-A-20106 - Level 06 Floor Plan - Proposed - P3
ET-DR-A-20107 - Level 07 Floor Plan - Proposed - P2
ET-DR-A-20108 - Level 08 Floor Plan - Proposed - P2
ET-DR-A-20109 - Level 09 Floor Plan - Proposed - P2
ET-DR-A-20110 - Level 10 Floor Plan - Proposed - P2
ET-DR-A-20111 - Level 11 Floor Plan - Proposed - P2
ET-DR-A-20112 - Level 12 Floor Plan - Proposed - P2
ET-DR-A-20113 - Level 13 Floor Plan - Proposed - P2
ET-DR-A-20114 - Level 14 Floor Plan - Proposed - P2
ET-DR-A-20115 - Level 15 Floor Plan - Proposed - P2
ET-DR-A-20116 - Level 16 Floor Plan - Proposed - P2
ET-DR-A-20117 - Level 17 Floor Plan - Proposed - P2
ET-DR-A-20118 - Level 18 Floor Plan - Proposed - P2
ET-DR-A-20119 - Level 19 Floor Plan - Proposed - P2
ET-DR-A-20120 - Level 20 Floor Plan - Proposed - P2
ET-DR-A-20121 - Level 21 Floor Plan - Proposed - P2
ET-DR-A-20122 - Level 22 Floor Plan - Proposed - P2
ET-DR-A-20123 - Level 23 Floor Plan - Proposed - P2
ET-DR-A-20124 - Level 24 Floor Plan - Proposed - P2
ET-DR-A-20125 - Level 25 Floor Plan - Proposed - P2
ET-DR-A-20126 - Level 26 Floor Plan - Proposed - P2
ET-DR-A-20127 - Level 27 Floor Plan - Proposed - P2
ET-DR-A-20128 - Level 28 Floor Plan - Proposed - P2
ET-DR-A-20129 - Level 29 Floor Plan - Proposed - P2
ET-DR-A-20130 - Level 30 Floor Plan - Proposed - P2
ET-DR-A-20131 - Level 31 Floor Plan - Proposed - P2
ET-DR-A-20132 - Roof Plan - Proposed - P2

Elevations - Proposed
ET-DR-A-30010 - South Elevation - Proposed - P3
ET-DR-A-30011 - North Elevation - Proposed - P3
ET-DR-A-30012 - East Elevation - Proposed - P3
ET-DR-A-30013 - West Elevation - Proposed - P3
ET-DR-A-30020 - South Elevation Proposed - Illustrative - P3
ET-DR-A-30021 - North Elevation Proposed - Illustrative - P3
ET-DR-A-30022 - East Elevation Proposed - Illustrative - P3
ET-DR-A-30023 - West Elevation Proposed - Illustrative - P3

Sections - Proposed
ET-DR-A-30001 - Section A-A - Proposed - P2
ET-DR-A-30002 - Section B-B - Proposed - P2
ET-DR-A-30003 - Section C-C - Proposed - P2
ET-DR-A-30004 - Section D-D - Proposed - P2

Technical Drawings
ET-DR-A-5000 - Bay Study Typical Illustrative - Proposed - P3
ET-DR-A-5001 - Bay Study Amenity Illustrative - Proposed - P3
ET-DR-A-5002 - Bay Study Podium Illustrative - Proposed - P1

Landscaping Plans
364_20.000 R1 PROPOSED PUBLIC REALM - Illustrative
364_20.001 R1 PROPOSED PUBLIC REALM - General Arrangement - Level 00-01
364_20.002 R1 PROPOSED PUBLIC REALM - Boundaries and Edges - Level 00-01
364_20.003 R1 PROPOSED PUBLIC REALM - Levels and Drainage Intent - Level 00-01
364_20.004 R1 PROPOSED PUBLIC REALM - Planting Plan - Level 00-01
364_20.005 R1 PROPOSED PUBLIC REALM - Tree Plan - Level 00-01
364_20.006 R1 PROPOSED PUBLIC REALM - General Arrangement - Level 02
364_20.007 R1 PROPOSED PUBLIC REALM - Planting Plan - Level 02
364_90.001 R1 PROPOSED PUBLIC REALM - Open Space Provision - Level 00-01
364_90.002 R1 PROPOSED PUBLIC REALM - Open Space Provision - Level 02

Reports:

1. Covering Letter dated December 2024
2. CIL Form dated December 2024
3. Town Planning Statement December 2023 and Town Planning Statement Addendum December 2024
4. Accessibility Statement December 2023 and Accessibility Statement Addendum December 2024
5. Acoustic Report December 2023 and Acoustic Report Addendum December 2024
6. Archaeological Desk-Based Assessment December 2023 and Archaeological Desk-Based Assessment December 2024
7. Revised Basement Impact Assessment P07 December 2024
8. Revised Biodiversity Survey and Report December 2024
9. Urban Greening Factor Assessment December 2024
10. Circular Economy Statement Revision C December 2024
11. Crime Impact Assessment Revision H December 2024
12. Design and Access Statement Revision B December 2024 and Design Addendum March 2025
13. Employment and Skills Strategy and Regeneration Statement December 2023 and Employment and Skills Strategy and Regeneration Statement December 2024
14. Energy Statement Revision P05
15. Daylight and Sunlight Assessment December 2023 and Daylight and Sunlight Assessment Addendum December 2024
16. Demolition Feasibility Appraisal Volume 0 Revision B December 2024, Volume 1 Revision D December 2023, Volume 2 Revision B December 2023, and Volume 3 Revision B December 2024
17. Drainage and SuDS Strategy December 2023 and Drainage and SuDS Strategy Addendum December 2024
18. Fire Statement December 2023 and Fire Statement Addendum December 2024
19. Flood Risk Assessment December 2023 and Flood Risk Assessment Addendum December 2024
20. Health Impact Assessment December 2023 and Health Impact Assessment Addendum December 2024

21. Landscaping Scheme December 2023 and Landscaping Scheme Addendum December 2024
22. Lighting Assessment Addendum December 2024
23. Enterprise Space Framework December 2024
24. Sustainability Statement Revision C December 2024
25. Statement of Community Involvement December 2023 and Statement of Community Involvement Addendum December 2024
26. Telecommunications Report December 2023 and Telecommunications Report Addendum December 2024
27. Transport Assessment December 2023 and Transport Assessment Addendum December 2024 including:

    a. Draft Construction Management Plan December 2024
    b. Delivery Servicing Management Plan December 2023 and Delivery Servicing Management Plan Addendum December 2024
    c. Car Parking Design and Management Plan December 2023 and Car Parking Design and Management Plan Addendum December 2024
    d. Operational Waste Management Strategy December 2023 and Operational Waste Management Strategy Addendum December 2024
    e. Site Waste Management Plan December 2023 and Site Waste Management Plan Addendum December 2024
    f. Outline Travel Plan December 2023 and Outline Travel Plan Addendum December 2024
    g. Outline Construction Logistics Plan Version 1.0 December 2024
    h. Arboricultural Assessment December 2024
    i. Ventilation Strategy December 2023 and Ventilation Strategy Addendum December 2024
    j. Whole Life Carbon Assessment Revision C December 2024
    k. Environmental Statement December 2023 and Environmental Statement Addendum December 2024

RECOMMENDATION SUMMARY:

Grant conditional planning permission following:

(i) Referral to Mayor of London for his direction;
(ii) Finalisation of detailed wording for conditions following consultation with the Mayor; and
(iii) Completion of Section 106 Legal Agreement.

Applicant:	**Agent:**
British Land Property Management Ltd York House 45 Seymour Street London W1H 7LX	Newmark (formerly known as Gerald Eve) One Fitzroy 6 Mortimer Street London W1T 3JJ

ANALYSIS INFORMATION

Use Class	Existing (sqm) GIA	Proposed (sqm) GIA	Difference (sqm) GIA
Offices including lab-enabled workspace – Class E(g)	53,771	77,223	+23,452
Retail – Class E(a)	1,055	997	-58
Enterprise Space – (composite Class E/F) sui generis	0	1,605	+1,605
Total	**54,826**	**79,825**	**+24,999**

Car Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	99	3
Proposed	0	2

OFFICERS' REPORT

<u>Reason for Referral to Committee</u>:
Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace
and
Applications which involve the making of an obligation or agreement under Section 106 of the Town and Country Planning Act 1990 or other legislation ("the obligation") that secures more than £50,000 of financial contributions or other public benefits of estimated equivalent capital value [clause 3(i and iv];

<u>Reason for Referral to Mayor</u>: This application is referable to the Mayor of London under the provisions of Category 1B of the Schedule to the Town & Country Planning (Mayor of London) Order 2008: "<u>Development in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres"</u>

<u>Environmental Impact Assessment (EIA)</u>:
The development is EIA development. An informal scoping opinion from the council was offered at pre-application stage, and a formal scoping opinion was subsequently provided, setting out the issues it considered to be in scope under the EIA Regulations 2017, updated 2020. The Environmental Statement (ES) was submitted with the application.

Once Camden has resolved how to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

EXECUTIVE SUMMARY

This application would involve the substantial demolition/deconstruction of the existing tower and the construction of a new tower of the same height, but with an increased floorspace of +24,999.

The refurbishment of the existing building is considered technically possible and more sustainable. However, if refurbishment is not 'viable' then given the design requirements for lab-enabled offices which result in higher whole life carbon and operational carbon impacts then whilst the proposals do not meet all of the policy requirements, in this case the proposals are considered reasonable and therefore acceptable in terms of sustainability subject to conditions. The low figures with regards carbon reduction are in part due to the nature of the proposals – a tall building, and also that lab-enabled floorspace is included. Officers therefore support deconstruction/demolition. Officers have pushed for retention of as much as possible, but have accepted substantial demolition is needed in this case to deliver on other objectives. On paper, the proposed tower doesn't appear to be an exemplar scheme in terms of sustainability, but it performs as well as, if not better than other buildings of this form and use.

Policies E1 and E2 seek to support new employment space and to support and grow the Knowledge Quarter. This scheme aligns with the strategic objective of delivering new high quality office and lab enabled space in the heart of the Knowledge Quarter. In addition the development construction will provide employment and training opportunities for local people as will the end use of the building and affordable workspace.

The scheme triggers the mixed use policy (H2). Housing is not being provided on site. Officers have accepted that the typology of the building and constraints of the site mean it would be difficult to provide housing on site, particularly affordable housing. Officers explored the options for provision off-site on donor sites. A potential donor site under the applicant's control at William Road was identified but it was felt by officers to deliver a low number of units which were not of the highest quality. Alternatives were considered and a number of plots on the Tybald's Estate were identified as an alternative donor. In this case it is council land which already has planning permission for private homes. It was felt if the applicant were able to fund the delivery of these homes as affordable housing it would present a better option overall than the offer at William Road and/or taking a full payment-in-lieu. To address Local Plan policy H2, officers have negotiated payment of £27M for delivery of affordable housing on Tybald's Estate. The delivery of affordable housing in the south of the borough is often difficult to achieve, and the provision of these 28 affordable homes is strongly supported.

The existing tower is not considered to be architectural merit and is not within a conservation area. There are a number of conservation areas in the vicinity, as well as listed buildings and the Grade I listed Regent's Park. The existing tower harms heritage assets in the area. None of the existing harm to heritage assets would be removed by the proposed development. In almost all instances the impact is considered to be neutral when compared to the extant condition. However, in the matter of the setting of the Fitzroy Square Conservation Area, Regent's Park Conservation Area and Regent's Park Registered Park and Garden, and a small

number of listed buildings, the harm caused to setting by the proposed development is slightly greater than the extant condition. This is due to the increased “thickness” of the silhouette which is perceptible in the long view over the Nash terraces, the detailing of the upper storeys in contrast to the body of the Tower (compared to the lower degree of contrast between crown and body on the extant façade) and the decrease of reflectivity by the superimposition of a masonry grid structure. The harm is identified as less than substantial at the lower end of the scale.

The proposed building is recognised as high-quality, made from a tower that is divided into four quadrants with a crown at the top and the podium base that responds to the scale of the context. The articulation of the tower into four parts helps to achieve a vertical proportion, with rounded corners and light coloured cladding to soften the appearance. The podium facades and the proposed materials and colours sit comfortably within the local context, and would result in a building of architectural quality.

The existing environment is quite stark and corporate feeling, not very inviting to residents. The proposal is to create a space which is more inclusive, greener and more inviting. The application includes significant improvements to the public realm and the wider street network, particularly on Regent’s Place Plaza.

The scheme has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight and privacy. There would be an impact in terms of loss of daylight to properties at 40-60 Hampstead Road, however, taking account of the BRE guidelines, the need to apply flexibly and take into account the existing situation with, officers do not feel that any losses would justify refusal.

The scheme would deliver substantial land use, employment and economic benefits, including affordable housing. The design of the new buildings is high-quality architecture. The public realm improvements are also substantial benefits. Taking account of the policies of the development plan and all material planning considerations, including the representations made by local residents, the proposals are considered acceptable, the less than substantial harm to heritage assets which has been identified is outweighed by public benefits and it is therefore recommended that planning permission be granted.

1 SITE

1.1 The site is located to the north-east of the junction of Euston Road (A501) and Hampstead Road. The site is located on the south-eastern corner of Regent's Place and has an area of 0.79ha. Hampstead Road borders the site to the east, with Brock Street and other buildings (commercial and residential) within Regent's Place to the north and north-west. Regent's Place Plaza is located to the west of the tower, but forms part of the application site. Euston Road is located to the south, with Warren Street station beyond to the south and UCL Hospital beyond to the south-east. Tottenham Court Road is also located to the south of Euston Road, continuing Hampstead Road southwards.

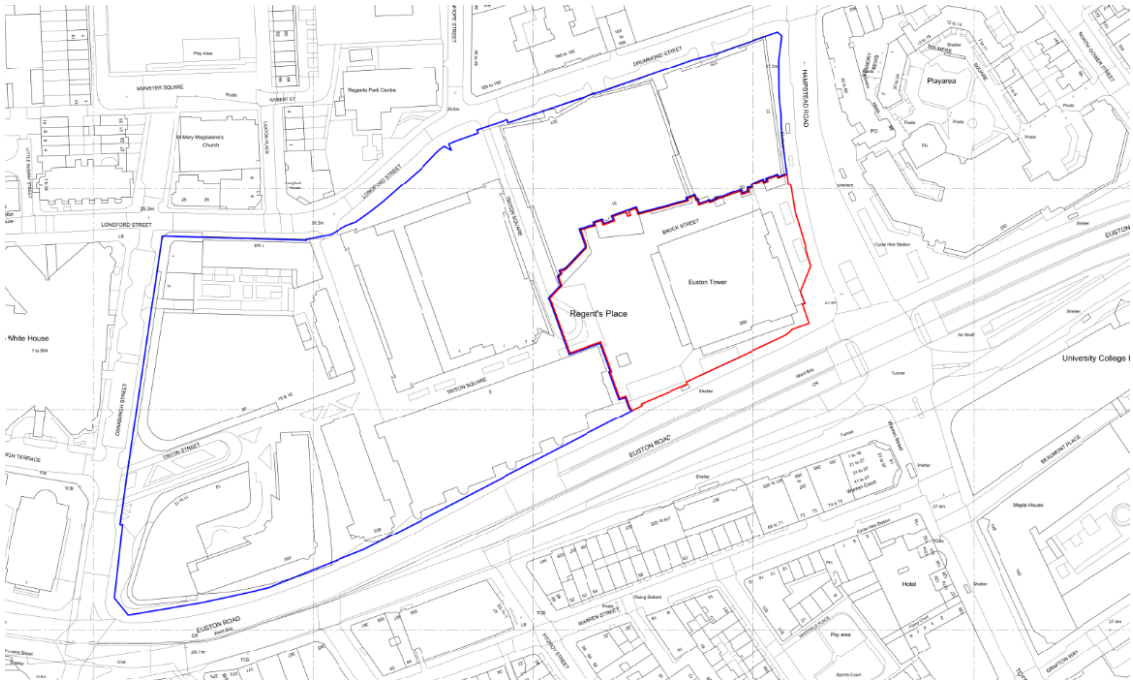


Figure 1 – Existing site in red, with ownership of British Land in blue

1.2 The site covers an area of 8,079sqm. It is currently occupied by the Euston Tower, a 36storey (including ground floor) tower, which was constructed between 1965 and 1970 and designed in the International Style of modernist architecture. Regent's Place Plaza also forms part of the site. The building is occupied by Class E retail uses at ground floor. The upper floors were last used for Class E office purposes but are currently vacant.

Figure 2 – Images of the existing Euston Tower

1.3 The Euston Tower has been granted a Certificate of Immunity from listing by Historic England, which lasts until the 2nd of July 2029. Historic England concluded that the building "*does not demonstrate the high degree of architectural quality required of a building of this type and date, has undergone significant alteration and loss of original fabric, including the interiors, and does not have significant claims to group value*".

1.4 The site is not situated within a conservation area. The nearest conservation areas in the vicinity are the Fitzroy Square Conservation Area and the Bloomsbury Conservation Area to the south and the Regent's Park Conservation Area to the west. Fitzroy Square, to the south of the site, has a number of Grade I and Grade II* listed buildings. The BT Tower, also to the south of the site is Grade II listed. Regent's Park is a Grade I Registered Park. The Euston Tower is prominent in some London View Management Framework (LVMF) views (see 'Conservation and Heritage section below).

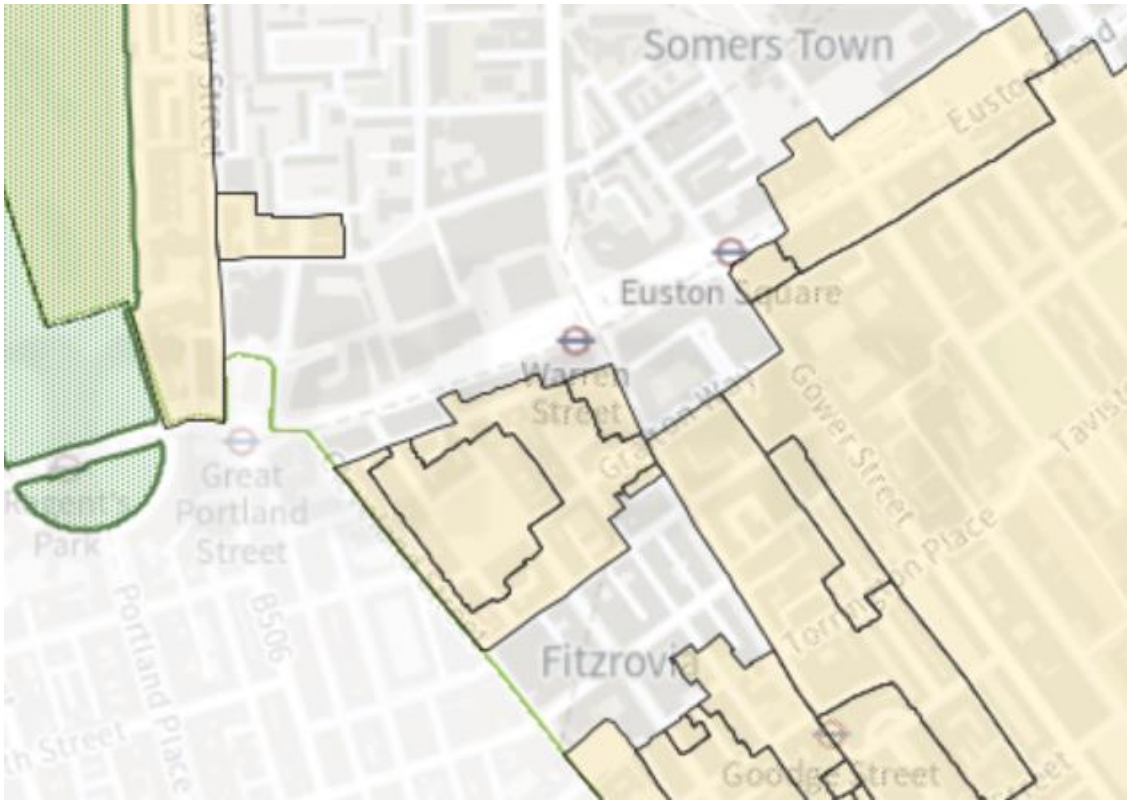


Figure 3 – Conservation Areas (in light yellow) surrounding the site

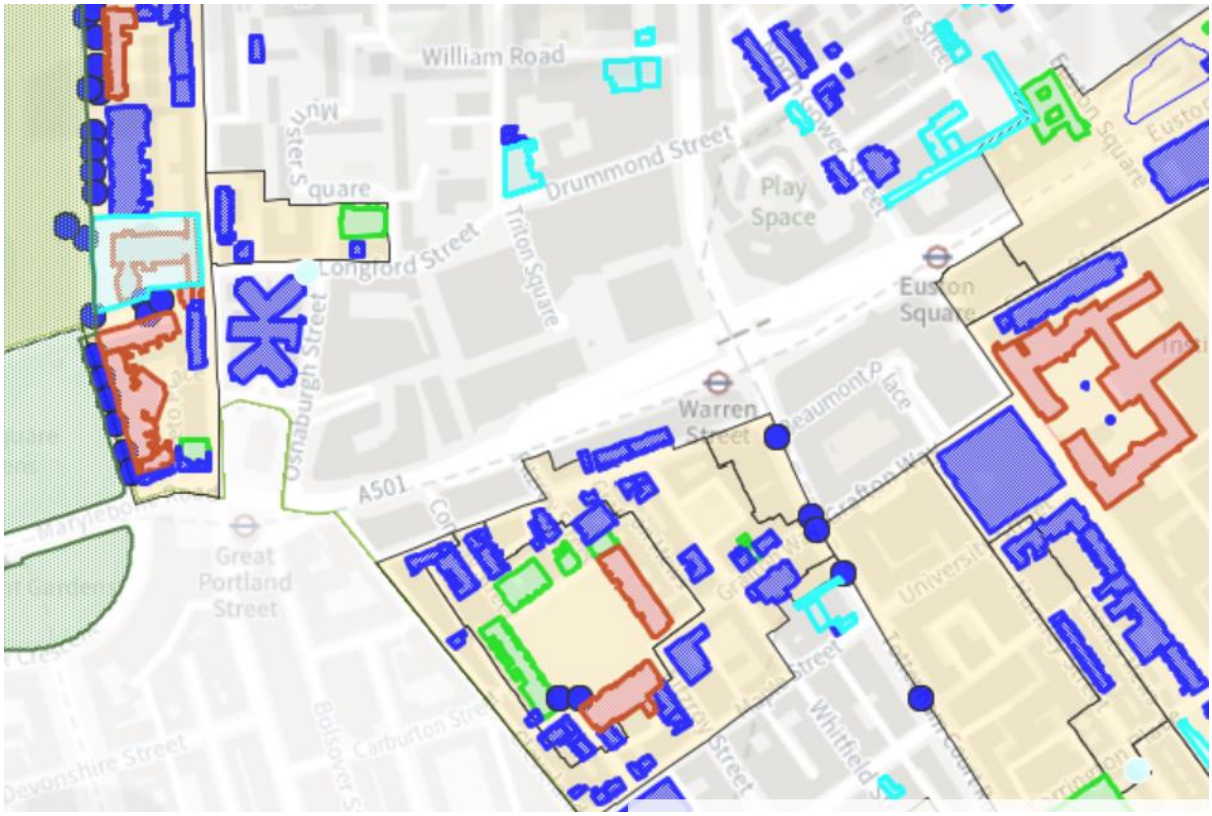


Figure 4 – Listed buildings in the area (and key)

1.5 The area has a mixture of commercial, residential and community uses. The site is within the Central London Area. The site lies just on the western edge of the Euston Growth Area. The site lies within the Euston Opportunity Area, designated as a key location for large-scale development, by the London Plan. The site lies within the Central Activities Zone (CAZ) as well as the Knowledge Quarter (KQ), where there is a cluster of scientific, technological and educational institutions and companies. The KQ centres around King's Cross and Euston, but spans from Camden Town to Holborn and Covent Garden. The KQ is a thriving innovation district, with research organisations, high-growth companies, knowledge-intensive industries, and a significant academic base. Improving the quality of place and ensuring that the KQ continues to be recognised as a vibrant and distinctive place is fundamental to its success.

1.6 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). There are a number of London Underground stations in close proximity; Warren Street, Euston Square, Great Portland Street and Euston. In addition, bus stops serving various bus routes are located nearby on Hampstead Road, Euston Road and Tottenham Court Road.

1.7 British Land, who are the applicant and owner of the site, are the freeholders of the surrounding Regent's Place development.

2 THE PROPOSAL

2.1 The applicant's vision is to 'create a world leading science, technology and innovation building' within the Knowledge Quarter.

2.2 The application is for substantial redevelopment of the tower, but retaining parts of the existing building; the core and the basement. A new tower would be built incorporating these elements. The tower would not be built higher than the existing 36-storey tower at 124.5m but the floorplates would all be enlarged to increase the floorspace from 54,826sqm (GIA) to 79,825sqm (GIA). The proposed building would comprise two distinct parts; the podium with a larger footprint at the base (ground to fifth floors) and the tower above. The proposed

building would comprise 32 storeys - the same height as the existing, but with larger floor-to-ceiling heights per floor.

Figure 5 – Existing Euston Tower

2.3 The existing tower has some Class E retail use at ground floor level with the rest of the building last being used as Class E offices. Under the proposals, the tower would be predominantly Class E offices, with specific lab-enabled 'research and development' (Class E(g)(ii)) and some Enterprise Space (sui generis) (see 'Land Use' section).

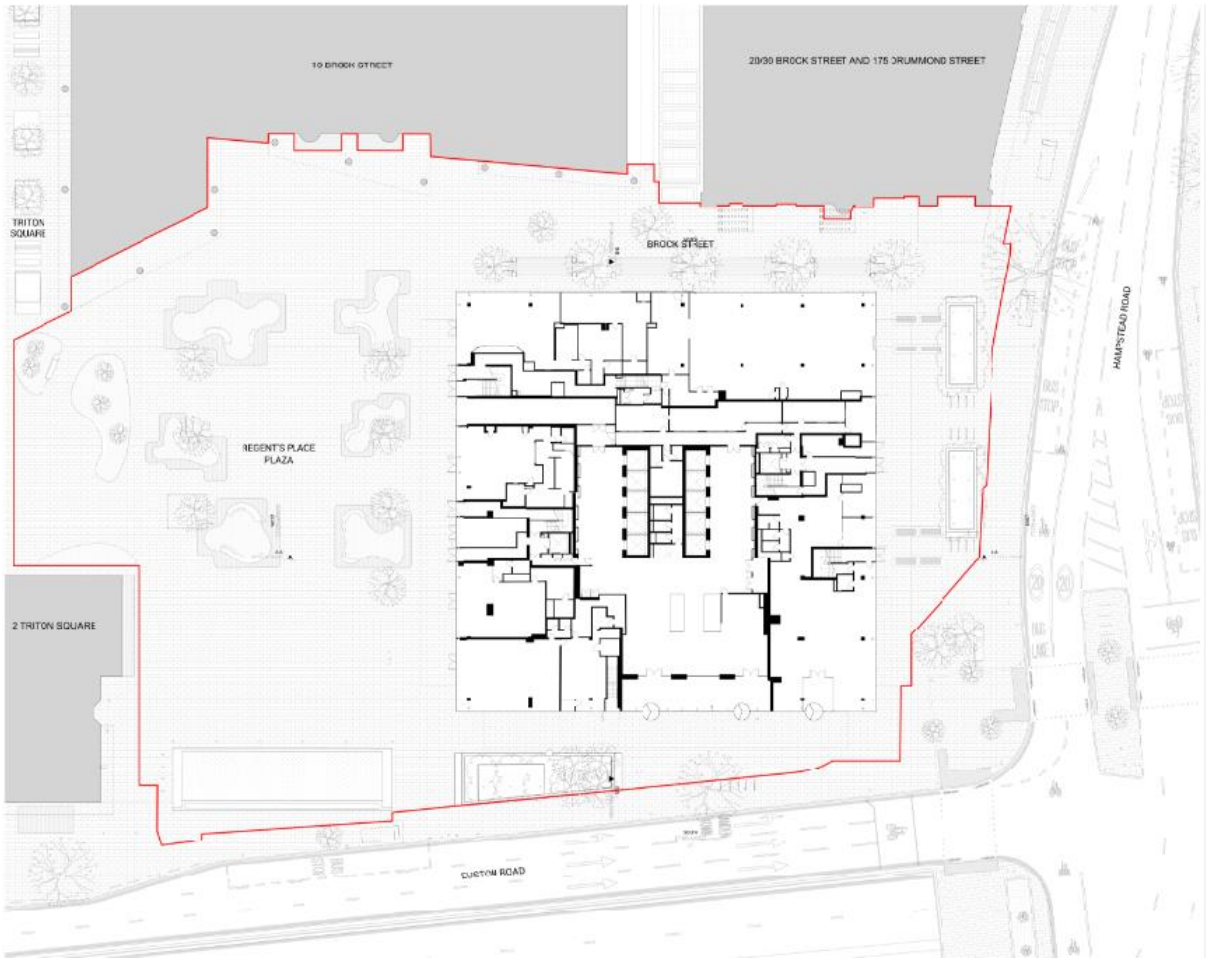


Figure 6 – Footprint of the existing tower

2.4 The main building material for the tower would be Glass Reinforced Concrete (GRC).

2.5 There is an existing basement under the building. This would be used for back of house facilities such as cycle parking, showers and waste storage. Two blue badge car parking spaces would also be located here. Under the proposals, this would be extended downwards to create a second level of basement, which would be occupied by plant. This would not be a full basement storey excavation, but just a small area for plant only.

2.6 Regent's Plaza, to the west of the tower, forms part of the application site. New landscaping would be carried out on the plaza as part of the proposals, as well as around the rest of the perimeter of the new tower.

Revisions during the course of the application

2.7 The application was submitted in December 2023 and has undergone a number of revisions since then. The floorplans, massing and elevations have been simplified with a rectangular form and a crown at the top of the tower. The podium has been increased from four to six storeys. These changes have resulted in an increase in floor area of 2,283sqm (GIA), to the above total increase of 24,999sqm (GIA). No changes were made in terms of the proposed height.

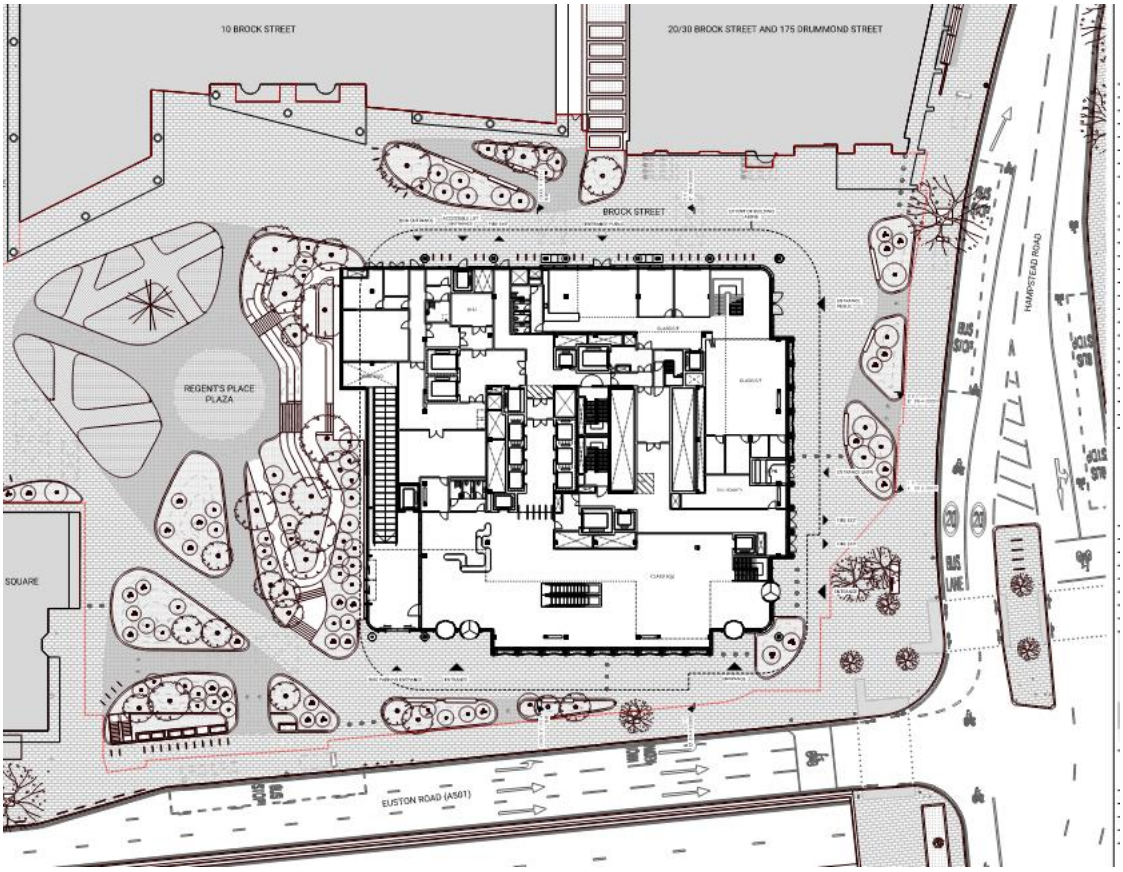


Figure 7. Footprint of proposed tower

Consultation

2.8 The applicant undertook their own public consultation prior to submission of the application and before and after making revisions, during the course of the application. A Development Management Forum and Developer's Briefing were held, both prior to the revisions were made. The Council consulted on the application as per normal practice when the application came in and when the revisions were made to the application submission.

3 RELEVANT HISTORY

Euston Tower

3.1 There have been a number of minor planning applications relating to the site over the years, but all of these are relatively minor and none are considered to be material to the considerations of this application.

3.2 3rd March 2024 – The Euston Tower was granted a Certificate of Immunity from listing by Historic England, which lasts until the 2nd of July 2029. Historic England concluded that the building "*does not demonstrate the high degree of architectural quality required of a building of this type and date, has undergone significant alteration and loss of original fabric, including the interiors, and does not have significant claims to group value*".

Neighbouring sites

3.3 The following planning history is relevant with regards to sites near to the application site:

Regent's Place - 25th March 2007 – permission granted for '*Redevelopment involving demolition of remaining buildings, basements and structures and the erection of 26 storey block comprising 101 private residential units plus an 8 storey block comprising 70 affordable units (Class C3) -both blocks positioned on top of a one storey plus mezzanine level podium-; a part 16, part 11, part 9 storey block comprising 47,168sqm Class B1 office floorspace, plus retail/financial & professional services/restaurant/pub or bar/community (Class A1 / A2 / A3 / A4 and D1) uses at ground floor, provision of basement and lower basement levels together with associated access, parking (comprising 182 parking spaces) , servicing, open areas and landscaping, alterations to and enlargement of Triton Square.'*

*1 Triton Square; 21st November 2017 – permission granted for '*Erection of 3 storey extension at roof (6th floor) level of 1 Triton Square to provide additional office floorspace (Class B1) with relocated plant above, creation of roof terraces at 6th floor level, reconfiguration of ground floor including infill of Triton Square Mall including flexible retail (A1, A3 and A4), affordable workspace (B1) and reprovision of gym (D2); erection of part 6, part 9 storeys residential building to provide 22 flats (10 x 3-bed, 11 x 2-bed and 1 x 1-bed) (Class C3) following demolition of St Anne's Church (Class D1); hard and soft landscaping including garden at junction of Longford Street and Triton Square; reconfigured vehicle and pedestrian accesses; and other ancillary works.*'*

Tybald's Estate

3.4 The permission below is relevant with regards the off-site housing provision (see 'Land use' section below).

2013/1014/P – Permission granted on the 13th of May 2014 for "*Mixed use development to provide 93 mixed tenure residential units (Class C3), alterations to existing dwellings and entrances, 249 sqm of new/replacement community facilities (Class D1) an energy centre, refuse, cycle and caretakers facilities and associated landscape and public realm improvement works. The provision of a new internal access road and the reorganisation of car parking within the site and the surrounding area.*"

4 ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

2023/3265/P - Euston Tower, 286 Euston Road, London NW1 3DP

"Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building."

The Proposed Development falls within the threshold set out in paragraph 10b of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations'), as it involves an urban development project of more than 1 hectare. The Proposed Development is likely to give rise to significant environmental effects, and as such, is EIA development and subject to the EIA process. The proposals constitute an EIA development under the EIA Regulations 2017. The Environmental Statement (ES) was submitted with the application. The ES was independently reviewed by a third party consultant.

5 CONSULTATION SUMMARY

Statutory Consultees and national groups

5.1 The application was submitted in December 2023. Revisions were submitted in December 2024. Where the comments below relate only to the superseded scheme, this has been made clear below

5.2 **Greater London Authority (GLA)**

Urban design

- Although elevations are calmer, they retain a sculptural quality mainly due to upstands that are skilfully integrated into the elevation, giving depth and relief.
- The change in facade colour is supported. The previously proposed orange hue appeared quite prominent in views including from LVMF Views 2A.2, 2B.1 at Parliament Hill and 4A.2 at Primrose Hill. The updated views demonstrate that the calmer cooler palette works well in the context and in townscape views.
- The Townscape, Visual and Built Heritage Impact Assessment (TVBHIA) includes LVMF 2B.1 'Parliament Hill: east of summit - at the prominent oak tree (VIEW A8). In this view the proposal would not intrude in the protected vista and have a similar impact to the existing condition albeit a lighter tone. There would be no impact from Lambeth Bridge LVMF19A.1 and 19A.2.
- The principle of a base, tower and top is supported.
- GLA Officers support the rationalisation of the base of the tower which makes the tower appear more grounded, less imposing and relates well to the human scale. There is a strong visual relationship between the base and the rest of the tower which is supported.
- GLA Officers support expressing the upper storeys of the buildings as the 'crown' and the principle of a sculpted crown. The top of the building is clearly defined.
- The breathing spines appear recessive and detailed appropriately.

Heritage

- Less than substantial/very low level of harm to: Regents Park (Grade I), BT Tower (Grade II), 131 Drummond Street (Grade II), The Crown and Anchor Public House (Grade II), Bloomsbury Conservation Area including the Church of St Pancras (Grade I) and Euston Fire Station (Grade II*)
- Less than substantial/low to middle harm to Fitzroy Square Conservation Area nearby to the south and the listed buildings within it.

Officer's response: See Sections on 'Urban design' and Conservation and heritage' Officers agree with the GLA's comments.

5.3 **Historic England** – No objection. The proposed design changes have largely addressed previous concerns.

- Previously raised concerns about the harmful impact of the proposed redevelopment on surrounding heritage assets, including the Fitzroy Square Conservation Area and Regent's Park.
- The revised design has a calmer and more ordered façade design, alongside a more muted colour. These changes help to make the proposed development less assertive and so would reduce the level of harm. We are pleased to see that our advice has been taken into account and consider that our previous concerns have largely been addressed.

5.4 **Natural England** – No objection.

5.5 **Transport for London**

- The GLA Stage 1 report (date 21st March 2024), requested £383,984.64 towards Euston Circus Healthy Streets, land on site for Cycle Hire, and £200,000 towards the costs of the Cycle Hire. TfL also requested conditions related to construction and operation of the development.
- TfL would like to see draft s106 Heads of Terms that define both the contribution and separate agreement about direct works to be agreed by TfL via under Section 278 of the Highways Act 1980. This will be in the form of definitions and plans that set out the scope of works to be covered by Section 278 agreement with TfL, and what is for TfL to deliver a wider Healthy Streets scheme. The reason for this is to ensure the development aligns with London Plan policy T1 and T2, as well as T9, in a reasonable way.
- For Cycle Hire, TfL would like space on site for Cycle Hire docks, the exact location could be determined as part Section 278 works with TfL, if an indicative drawing and definition was included in s106. The provision of the Cycle Hire docking station could be secured via Section 278 rather than via a financial contribution, if on the TLRN or adjacent public realm, or as financial contribution as set out in the GLA report. This request aligns with policy T1, T3, T4 and T5 of the London Plan.
- TfL does have concerns with the construction impact on the Transport for London Road Network (TLRN) – Hampstead Road and Euston Road, as well as concerns around road safety and bus operation. TfL will continue to work with the developers, their consultants, and contractors to help minimise impact and help co-ordination with other projects such as HS2. At this stage, we would like confirmation that mitigation will be secured by condition and would like to see draft conditions when prepared. We can confirm the general approach to construction access set out in outline Construction Logistics Plan (CLP) is acceptable to TfL. These conditions are requested in accords with Policy T7 of the London Plan.

Officer's response: See 'Transport' section, obligations requested by TfL have been included.

5.6 **Transport for London (Crossrail 2)** – No objection subject to a condition on design and construction method statements.
Officer's response: Conditions attached as requested (Crossrail2).

5.7 **Transport for London (Infrastructure)** – No objection subject to conditions on consultation with TfL infrastructure before commencing works.
Officer's response: Condition attached as requested (LUL Infrastructure).

5.8 **London Underground** – No objection in principle**,** subject to conditions**:**

- There are a number of potential constraints from the proximity of railway infrastructure. It will need to be demonstrated that, to the satisfaction of TfL engineers, there is no impact on structures.
- Conditions requested on details of structures, construction, basements and piling.

Officer's response: Conditions attached as requested (LUL Infrastructure)..

5.9 **HS2**

- The proposed Euston Tower development construction programme coincides with SCS's programme for the extension to Hampstead Road bridge (scheduled 2025 - 2032) and MDjv programme for HS2 works on Euston Road. If the traffic network was impacted to unacceptable levels, HS2 Ltd is concerned that TfL may look to refuse works and delay programmes to lessen impacts, adding considerable time and cost to the HS2 project.
- A further concern is the need for any utility works in connection with the proposed development. Some details are provided on the power connection for construction and there is potential for this to conflict with some of HS2's works. As such, HS2 Ltd requests that information is provided on the scope of any new utility connections related to the development, or if the plan is to make use of the existing connections.
- Accordingly, HS2 Ltd requests that engagement/collaboration measures are put in place to ensure mitigate the impact of the proposed development's construction on the HS2 scheme in that location. The appropriate mechanism for which, if the LPA are ultimately minded to grant consent, would be through attachment of compliance style planning conditions requiring submission of Construction Environmental Management Plan (CEMP) and Construction Logistics Plan for approval at the pre-commencement stage.

Officer's response: Liaison with HS2 is included as part of the CMP in the section 106 planning obligations, including liaison over utilities.

5.10 **Environment Agency** – No objections, subject to a condition on NRMM.

5.11 **Thames Water** – No objection subject to conditions on piling and water capacity.

5.12 **Natural England** – No objection.

5.13 **City of London** – No objection

5.14 **London Borough of Barnet** – No objection.

5.15 **London Borough of Brent** – No objection.

5.16 **London Borough of Haringey** – No objection

5.17 **London Borough of Islington** – No objection

5.18 **London Borough of Southwark** – No objection

5.19 **Metropolitan Police** – No objection.

- The public realm and commercial space should be kept separate to avoid potential conflict.
- Visibility should be maintained in the landscaping.
- Lighting and CCTV are important.
- Depending on the nature of the prospective uses, protests may occur. An area should be considered to facilitate this.
- There should be further discussions to ensure that the proposals achieve Secured by Design.

Officer's response: See 'Safety and security' section.

Councillors

5.20 **Councillor Nadia Shah** - Support

- Proposals have been shaped in collaboration with local people
- Benefits for the community and Camden
- Will create pioneering workspaces, supporting thousands of jobs, including opportunities for local people and at least 160 apprenticeships in construction and STEAM-related industries
- Will create a greener all-electric building
- The new Enterprise Space will support local start-ups, with space for inclusive innovation, collaboration, and knowledge sharing. We have great need to provide these facilities to our community.
- I support/took part in the engagement and co-design process, which has helped to inform the design of the new and enhanced public spaces, taking into account the needs and aspirations of our community.
- I also welcome the £27m of funding which the project will generate to deliver much needed additional affordable homes in Camden

5.21 **Councillor Nasim Ali** - Support

- Proposals have been shaped in collaboration with local people
- British Land's vision for the building is sustainable and inclusive.
- The project aims to create at least 160 apprenticeships and 70 jobs for local people in construction and high-growth sectors. New and revitalised public spaces at Regent's Place will encourage social interaction in safe and welcoming environments. New workspaces for the Knowledge Quarter will support investment and create opportunities, including through a new Enterprise Space, which will support local start-ups and encourage collaboration between science and tech businesses and the local community.

- The project will unlock £27 million in funding for affordable housing.

Local groups and institutions

5.22 **Camden Cycling Campaign** - Objection

- Poor access to cycle routes in the area from the Euston Road, the development does not improve upon this.
- Satisfactory entrance to cycle parking.
- Concerned about construction vehicles using Osnaburgh and Longford Streets for access from the Euston Road and Longford Street – these are often used by cyclists.

Officer's response: See 'Transport' section. The final details of construction routes would be agreed in the final CMP, which would need to take account of cyclist safety. With regards local cycle routes , TfL and the Council would secure financial contributions towards improvements in the area – though the spending for these has not been finalised at present.

5.23 **Climate Emergency Camden** - Objection

- Demolition of building, only retains 31% of the structure – should be 80-90%.
- Emissions, especially from steel, concrete cladding.
- Carbon footprint of new building.
- Is there more need for lab-enabled space in the area? Unused towers at Canary Wharf should be utilised instead.

Officer's response: See 'Sustainable design and construction' section. Inclusive Economy confirm there is demand for high-spec offices and KQ uses.

5.24 **Royal Parks** - Objection

- Proposed tower will be visible form Regent's Park, Kensington Gardens and possibly from Greenwich Park.
- Visible form strategic view from Primrose Hill.
- Additional massing will be detrimental to views and visual amenity.

Officer's response: See 'Conservation and heritage' section.

5.25 **Regent's Park CAAC**

- Proposed building would be bulkier, increase in massing.
- Support colour changes.
- How will GRC panels weather and how will they be maintained?
- How will building be lit at night/light pollution?
- Microclimatic concerns regarding wind.
- Would expect to see a traffic management scheme.

Officer's response: See 'Urban design', Conservation and heritage', 'Microclimate' and 'Transport' sections. Regarding the GRC, details of the final materials would be conditioned and the longevity of the material and how it is impacted be weathering would be a matter considered when considering relevant details applications.

5.26 **Friends of Regents Park and Primrose Hill** - objection

- Impact on Regent's Park and Primrose Hill Park, impact on heritage and significance.
- The tower will be prominently visible from these Parks.
- Tower is not elegant or graceful, like Centrepoint, overbearing form.

Officer's response: See 'Urban design' and Conservation and heritage' sections.

5.27 **Chester Terrace Residents Association**

- Tower is already visible – especially in winter, the building can clearly be seen from Broad Walk and the Outer Circle
- Tower is already an eyesore compared to Nash Terraces.
- Orange/red colour is at odds with the surroundings.
- Increase in size cannot be justified – why not just reuse the existing building and refurbish it internally.

Officer's response: See 'Urban design' and Conservation and heritage' sections

*Officer's response to comments above**:** Royal Parks, Regents Park CAAC and Friends of Regent's Park and Chester Terrace Residents Association all continue to have concerns about the form and design and the impact on views from key heritage assets. However, officers view is that the harm is less than substantial – mainly at the lower end of the scale. While there would also be harm at the middle fo the scale to Regent's Park and Fitzovia Square and its listed buildings, there are public benefits from the scheme that outweigh this harm. See 'Conservation and heritage' section for more detail.*

Adjoining occupiers

5.28 Site notices were displayed around the site from the 27th of December 2023, expiring on the 20th of January 2024 and on the 5th of April 2024, expiring on the 29th of April 2024. Press adverts were was placed on the 2nd of January 2024 and the 4th of April 2024 in the Camden New Journal.

Representations summary

5.29 **Ten** letters of objection raising the issues below, were received from local residents, including from these streets:

- Triton Building, Brock Street

Heritage and Conservation

- Increase in scale is not necessary.
- Impact on Regent's Park, Fitzroy Square, and Charlotte Street Conservation Areas.

Officer's response: See 'Urban design' and Conservation and heritage' sections

Comments on superseded design

- The proposed re-cladding of the building with precast elements and sloping facades is a disaster. It will hugely increase the bulk of the building, lacks any elegance and makes no sense. To increase the floor area they should be allowed to do so behind a new vertical high quality glazing system of minimal modern design.

- The proposed weird sloping facades are ungainly, heavy, non-reflective, ugly and overbearing.

Officer's response: The above comments are agreed with and officers have negotiated revisions since (see reconsultation details above).

Comments on existing building
- The existing tower is a good example of 1960's Miesian inspired architecture.
- Existing building respects architectural composition with a base, middle and top.
- Destruction of important focal point and landmark.
- Impact on attractiveness of the area.

Officer's response: See 'Urban design' and Conservation and heritage' sections

Amenity
- Loss of view from Triton Building (London Eye, Big Ben), loss of value to flats.
- Loss of light.
- Construction noise, length of construction period.
- Impact on wind and microclimate.
- Air quality.
- Dust.

Officer's response: Loss of private view is not a planning consideration. Loss of value of premises is also not a planning consideration. See 'Amenity of neighbouring properties', 'Microclimate' sections.

Land use
- The current plan allocates a disproportionate amount of space to office use against recreational and residential use.
- Surplus of offices in the area, is there demand for office use? Ways of working are changing and offices less in demand.
- Already empty/underutilised offices in area, increasing working from home.
- Do not believe that the existing building is unlettable No housing proposed, tower could be converted to residential.
- No residential component.
- Lack of retail use.
- Lack of community use.
- Uses not for local residents.

Officer's response: See 'Land use' section.

Public realm, biodiversity and trees
- Regent's Place should become more of a Granary Square concept.
- Regent's Plaza has only just been replanted.

Officer's response: See 'Nature conservation, trees and biodiversity' section.

Transport
- Loss of pavement space on Hampstead Road.

Officer's response: There is no loss of pavement on Hampstead Road.

Sustainability

- Unsustainable to demolish existing tower and build a new tower in its place.

Officer's response: See Sustainable design and construction section.

Consultation and Process

- Inadequate participation of leaseholders in the consultation process for residents of Triton Building.
- Falsely minimising visual impact.
- Leaseholders might not be aware of proposals, consultation may have missed them.

Officer's response: The applicant has undertaken their own public consultation and submitted a Statement of Community Involvement as part of their application. Officers consider the applicant's consultation process to be sufficient. The Council has also publicised this application in line with legislation and the Statement of Community Involvement (2024). Officers are happy with the latest set of images, which were published before the last round of consultation.

1 letter of **Support** from a local resident was received raising the following points:

- Workspaces for businesses of all sizes to accelerate the success of the Knowledge Quarter.
- Creating a more sustainable green building.
- Varied employment opportunities in different sectors for local people.
- Creating an Enterprise Space for established and start-up businesses.
- Ergonomically design of safe public spaces
- £27m of funding to support Camden's housing needs for affordable homes on the Tybald's Estate.

6 POLICIES & GUIDANCE

6.1 National Planning Policy Framework 2024

6.2 NPPG

6.3 The London Plan 2021

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- SD1 Opportunity Areas

- SD4 The Central Activities Zone
- SD5 Offices, other strategic functions and residential development in the CAZ
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D9 Tall buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H9 Ensuring the best use of stock
- H10 Housing size mix
- E1 Offices
- E2 Providing suitable business space
- E3 Affordable workspace
- E9 Retail, market and hot food takeways
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth
- HC3 Strategic and local views
- HC4 London views management framework
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodland
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts

- T5 Cycling
- T6 Car parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- FF1 Delivery of the plan and planning obligations

6.4 **Mayor's Supplementary Planning Guidance**

6.5 **Camden Local Plan (2017)**

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H2 Maximising the supply of housing from mixed use schemes
- H3 Protecting existing homes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- H10 Housing with shared facilities
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- A1 Managing the impact of development
- A2 Open space
- A3 Biodiversity
- A4 Noise and vibration
- A5 Basements
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- TC1 Quantity and location of retail development
- TC2 Camden's centres and other shopping areas
- TC4 Town centre uses
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

6.6 **Draft new Camden Local Plan**

The council has published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation (DCLP). The consultation closed on 13 March 2024. The DCLP is a material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

6.7 **Supplementary Planning Policies**

Camden Planning Guidance
Access for all
Air quality
Amenity
Basements
Biodiversity
Design
Employment sites and business premises
Energy efficiency and adaptation
Housing
Planning for health and wellbeing
Public open space
Transport
Trees
Water and flooding

6.8 **Euston Area Plan (January 2015)**

The Euston Area Plan is a planning framework for the regeneration of the Euston area that sets policies and guidance for future developments in the area. It also highlights opportunities to improve existing infrastructure and ensures that new development delivers benefits for the local community.

Camden Council last consulted on the EAP in January 2023. Since then, the government "paused" HS2 works at Euston and confirmed that HS2 will terminate at Euston where there will be a reduced size station.

6.9 **Camden Planning Statement on the Intermediate Housing Strategy and First Homes (March 2022)**

6.10 **The Fitzroy Square conservation area appraisal and management strategy was adopted on 16 March 2010.**

ASSESSMENT

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

7	**Principle of redevelopment**
8	**Land use** - Introduction - Proposed uplift of office use (Class E(g)) - Retail (Class E(a)) - Enterprise Space (Class E(g)/Class F) and affordable workspace - Conclusion
9	**Mixed use policy and housing**
10	**Conservation and Heritage** - Policy review - Site and significance - Impact of Proposed Works on Significance - Conclusion
11	**Urban design** - Policy review - Existing tower - Design process (including Design Review Panel) - Form and mass - Local views - Wider views - Details and materials - Re-use and adaptation -
12	**Nature conservation, open space, landscape and biodiversity** - Policy review - Introduction - Open space - Trees and landscaping - Biodiversity - Conclusion
13	**Amenity of neighbouring properties** - Policy review - Introduction - Daylight and sunlight - Loss of privacy - Noise
14	**Health impact**

15	**Basement impact**
16	**Air quality**
17	**Microclimate**
18	**Sustainable design and construction** - Introduction and policy review - Demolition/deconstruction of the existing building - Redevelopment strategy - Whole Life Carbon - Energy and carbon reductions - Climate change adaption and sustainable design - Conclusion
19	**Flood risk and drainage**
20	**Fire safety**
21	**Transport** - Policy review - Site location and access to public transport - Trip generation - Travel planning - Access and permeability - Public realm - Cycle parking - Car parking and vehicle access - Construction management - Deliveries and servicing - Transport Assessment - Highway works - Pedestrian, Cycling and Environmental Improvements - Micro and shared mobility Improvements
22	**Employment and training**
23	**Safety and security**
24	**Refuse and recycling**
25	**Planning obligations**
26	**Mayor of London's Crossrail CIL**
27	**Camden CIL**
28	**Conclusion**
29	**Recommendations**

30	**Legal comments**
31	**Conditions**
32	**Informatives**

7 PRINCIPLE OF REDEVELOPMENT

7.1 London Plan policy D2 says density of development proposals should consider future planned levels of infrastructure, rather than existing levels, and be proportionate to the site's connectivity and accessibility in terms of transport, jobs, and services. London Plan policy D3 says higher density developments should generally be promoted in areas well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling and that development must make the best use of land.

7.2 The application site already benefits from 'excellent' transport links, meaning that development here will have good access to public transport connections. This situation will improve further with significant transport improvements planned at Euston. In this respect it is expected by planning policy that the site should deliver higher density development.

7.3 Policy G1 of the Camden Local Plan (CLP) states that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure, and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The tower lies just outside the Euston Growth Area, which is identified as Policy G1 of the CLP, as a place where the most significant growth in the borough is expected to be delivered. The Euston Area Plan expects the provision of more development in the Euston Area.

Figure 8 – Euston Growth Area, with the Euston Tower site circled in red

7.4 The site also lies within the Central Activities Zone (CAZ) as well as the Knowledge Quarter (KQ). The KQ is a thriving innovation district, with research organisations, high-growth companies, knowledge-intensive industries, and a significant academic base. Improving the quality of place and ensuring that the Knowledge Quarter Innovation District (KQID) continues to be recognised as a vibrant and distinctive place is fundamental to its success.

7.5 The principle of an intensification of development in this highly accessible central London location within the KQ to provide new offices is supported by officers in principle and complies with planning policy.

7.6 The existing tower provides office accommodation, the applicant's view is that it would be difficult for it to continue to be used for that purpose. A Feasibility Report was submitted as part of the application, which assessed the possibility of reusing the existing building. This report was independently assessed by Hilson Moran and Elliot Wood. Officers recognise that the existing space has deficiencies, in terms of floor-to-ceiling heights and floor plates and that the façade would need to be replaced and that it is questionable whether a light-touch refurbishment would provide the quality of accommodation that would

realistically attract occupiers. Inclusive Economy confirm that there remains demand for offices despite the move to hybrid working (a concern raised by objectors), but the demand is for high-quality offices which is unlikely to be provided by the existing building even if it refurbished. Furthermore the proposals include lab-enabled floorspace, which it is accepted could not be incorporated into the existing building, given the floor-to-ceiling heights. The provision of lab-enabled space is supported by officers. Taking all this into account whilst re-use of existing buildings is something that planning policies seek to support because of the sustainability benefits, in this case it is considered that substantial demolition of the existing building would better deliver on other strategic objectives which include making better use of land which is supported by local, regional and national planning policy in the form of the NPPF 2024 and creating the type of employment floorspace for which there is the highest demand and which would attract a wide range of knowledge quarter occupiers supporting and growing this important ecosystem.

7.7 The proposals would deliver an uplift of 24,999sqm (GIA) floorspace. Given the above, the principle of demolition/deconstruction and development on the site is considered acceptable in principle, subject to environmental considerations. The acceptability of the density of the development is informed by conservation, design, and amenity issues, as part of a design-led approach. These are assessed in turn in the report below. The acceptability of the demolition of much of the existing tower from a sustainability and whole-life carbon angle is also considered separately below.

8 LAND USE

8.1 The principal land use considerations are:
- Introduction
- Proposed uplift of office use (Class E(g))
- Retail (Class E(a))
- Enterprise Space (Class E(g)/Class F) and affordable workspace
- Conclusion

Introduction

8.2 The existing building is predominantly in office use (Class E(g)), with some retail use (Class E(a)) at ground floor level. Under the proposals, the building would be substantially demolished and rebuilt, with the proposed building being predominantly Class E(g) offices, including, floors 4-11 would be specifically lab-enabled space (Class E(g)(ii)). Some retail floorspace would also be provided at first floor level.

8.3 The existing and proposed land uses on the site are as follows:

Use Class	**Existing (sqm) GIA**	**Proposed (sqm) GIA**	**Difference (sqm) GIA**
Offices including lab-enabled workspace – Class E(g)	53,771	77,223	+23,452

Retail – Class E(a)	1,055	997	-58
Enterprise Space – composite Class E/F	0	1,605	+1,605
Total	**54,826**	**79,825**	**+24,999**

Figure 9 – Existing and proposed land uses on the site (GIA)

Proposed uplift in office use (Class E(g))

8.4 Camden 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. London Plan policy SD4 supports the enhancement and intensification of offices, to meet demand for a range of types and sizes of occupier and rental values, especially in the CAZ.

8.5 Under the proposals, 77,223sqm (GIA) of office floorspace Class E(g)) would be provided – which is an uplift of 23,452sqm.

8.6 The Government's Science and Innovation Audit Report (2018) highlighted issues with the lack of appropriate commercial premises in the Knowledge Quarter and the affordability of such spaces.

8.7 British Land (the applicant) aim to 'reposition Regent's Place as a life science and innovation hub in the Knowledge Quarter'.

8.8 This quantity of floorspace triggers the Council's planning policy requirements around affordable workspace (the threshold being 1000sqm) and end use/occupier phase obligations (see 'Enterprise Space (Class E(g)/Class F) and affordable workspace' below).

8.9 The 3rd to 11th floor levels would accommodate 8,348sqm (GIA) of lab-enabled floorspace which fall within (Class E(g)(ii)) 'research and development'. This floorspace is especially welcome for its contribution to the Knowledge Quarter. Part of the justification for the demolition of a substantial part of the existing building relies on the fact that it cannot accommodate the floor-to-ceiling heights required for such specialist accommodation. Furthermore, officers also consider that the benefits of providing high quality space mean that the building is more likely to secure uses which contribute positively to the Knowledge Quarter. Given that the contribution of the proposed development to the Knowledge Quarter is given considerable weight in our assessment it is considered that, an obligation in the section 106 agreement should restrict occupation to Knowledge Quarter uses.

8.10 The Council's Inclusive Economy team have confirmed that there is still demand for offices, partly from a demand for quality office space and partly pent-up demand during the pandemic. Flexible, sustainable and high-quality office space that accommodates a range of working tasks is still in demand in Central London. The draft employment land study (June 2023) commissioned to inform the local plan review states that "*Net absorption provides another angle on demand, and*

while there were negative net absorption rates from 2020 to 2022, positive absorption rates in 2022 indicates that, overall, conditions within the office market are back to being favourable. This observation is corroborated by consultation with land agents, who attest to the strong demand for Grade A space in particular".

8.11 There is no specific tenant in mind at present.

8.12 The proposals would provide employment for between 3,825 and 4,695 people (full time equivalent). Officers recognise and welcome the increased employment opportunities that the scheme would create and the contribution to the KQ and local economy.

Retail (Class E(a))

8.13 There are currently retail units around the ground floor of the tower, which have a floorspace of 1,055sqm. Under the proposals, there would be 997sqm of retail floorspace (a loss of 55sqm) which would be provided in the form of a café at first and second floor levels. This would be accessed via the landscaping on Regent's Plaza. Whilst this loss is not considered significant, it is unfortunate to lose a large amount of retail floorspace at ground floor level. Nevertheless, the proposed ground floor would remain well-activated (see below) and a significant amount of retail floorspace would be provided.

Enterprise Space (sui generis – mixed flexible Class E(g)/Class F2) and affordable workspace

8.14 With regards to affordable workspace, the development will include 1,605sqm of enterprise space at ground and first floor level, comprising a minimum of 465sqm of affordable workspace at a 100% discount to market rents (i.e. peppercorn) for a period of ten years, with the remainder of the space for inclusive innovation, collaboration and knowledge sharing. This space will include events and collaboration space, for the local community, local entrepreneurs and small businesses.

8.15 The enterprise space operator would be a company, organisation or management group with experience of operating shared workspaces (including affordable workspaces) for businesses engaging in knowledge economy activities, multiple occupation by micro, small and medium sized enterprises or in the absence of such company, organisation or management group, may be the Owner itself. The enterprise space will be for knowledge quarter activities and would be geared towards supporting local enterprises, with space for start-ups

Policy E2 recognises that the affordable workspace that is secured will vary according to a number of factors. Camden Planning Guidance Employment sites and Business Premises (2021) also acknowledges that it should be considered on a case by case basis through discussions with the Inclusive Economy team. The Inclusive Economy team has been consulted and consider this a good offer and are supportive of the proposal. The affordable workspace package is a good offer because, whilst the amount of space to be delivered is lower compared to other nearby schemes (as a proportion of uplift), it is delviered at 100% discount which allows for a much wider range of viable options for delivery and end-user

affordability that would be significantly more accessible to local entreprenuers and enterprises. The overall approach, complemented by a flexible space that allows for community access and events furthers its accessibility and creates opportunities for convening and networking that helps strengthen the local innovation ecosystem in the Knowledge Quarter.

Conclusion

8.16 Officers welcome the increased employment opportunities that the scheme would create in the KQ and the positive impact it would have on the local economy.

9 MIXED USE POLICY AND HOUSING

9.1 Residential use is the Council's priority land use. This is reflected in the local plan policies (H2) which seek to ensure that housing forms a component of all schemes which result in an uplift in commercial floorspace of more than 200sqm (GIA). Policy H2 is triggered by this development proposal.

9.2 Policy H2 is the mixed use development policy and that requires 50% of all additional floorspace to be residential in the Central London Area. The site is within the Central London Area. Policy H1 of the London Plan sets housing targets for local authorities in London, for Camden the target is 1038 per year for the 10 year period. In order to ensure that housing targets are met Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through development plans and planning decisions. Policy H2 requires housing on-site first and foremost, particularly where more than 1000sqm of additional floorspace is proposed. If it is demonstrated that this cannot be achieved, taking account of the criteria in (a) to (e) which take account of site constraints, the efficiency and economics of providing a mix of uses, then the applicant should provide housing off-site on a donor site. In exceptional circumstances, where the applicant does not have and cannot find a donor site, a payment-in-lieu is required. Policy H2 requires the submission of a Financial Viability Assessment (FVA) where a scheme is not providing a full amount of housing/financial contribution, in line with this policy. Camden Local Plan policies H4, H6, H7 and Camden Planning Guidance 2 (Housing) are all also relevant with regard to the provision of housing, including affordable housing.

On-site housing

9.3 The existing building is in commercial use and there is no residential floorspace on site. No residential floorspace is proposed on site as part of the development proposal. In this case officers agree that it would not be possible to provide residential on-site, within the tower, given the impact on viability of providing an extra core for the residential use and the poor ratio of usable floorspace to core and a subsequent reduction in the overall viability of the scheme. Also, the large floorplates mean the space doesn't work well for housing and would not be suitable for a mixed use scheme. Any residential accommodation would need to be single aspect-except units occupying the corners of the tower. The provision of residential and office use across a single floor would result in large office floorplates with no windows on the side where the residential was provided. Providing the office and residential uses on separate floors would get round this,

but would still require separate cores. In addition to this, the provision of a mix of housing tenure including affordable housing would be even more challenging to achieve. Registered Providers generally request that affordable homes have their own access arrangements and core to aid with management of the accommodation and keeping service charges at an affordable rate. Given all of the above, whilst officers consider housing is required under Policy H2 they accept that residential provision on-site is not feasible in this particular case.

Off-site housing

9.4 The second part of the cascade in Policy H2 requires the provision of off-site housing. The policy requires that an applicant carry out a search for a potential donor site. If no sites are found to be available the option of a payment in lieu would be the third option to be considered only in "exceptional circumstances" which could contribute towards the provision of affordable housing on schemes expected to come forward in the immediate area.

9.5 A fully policy-compliant off-site proposal in this case would provide 12,500sqm of residential floorspace (the uplift of 24,999sqm/2). Policy H4 which seeks the provision of affordable housing in residential schemes would also kick in and given the quantum of housing it would be expected that 6,250sqm (i.e. 50%) of this would need to be affordable housing. The 50% target applies to developments where there is the capacity for 25 or more dwellings.

9.6 The applicant did offer to bring forward housing on a donor site at 7-9 William Road, an office building approximately 150m north of the site, which is owned by British Land. It was considered that this site would have had the capacity to provide nine flats (with a floor area of 1,515sqm). Whilst conversion of the premises at William Road was feasible in theory, it would have required the loss of employment space contrary to policy E2 and more importantly many of the proposed flats would perform relatively poorly in terms of daylight and sunlight and lack access to private amenity space. Also, significant sound insulation would be required. The costs of converting the William Road premises to residential would have been less efficient in cost terms than providing new-build housing. The amount of new housing provided would also be very small in relation to the scheme meaning that a considerable payment in lieu would also be required to meet with policy requirements. This would have calculated to £16,476,000. So in this case Policy H2 could be meet using William Road as a donor site, but it would deliver just 9 homes of varying quality and a PIL of £X to the affordable housing fund.

9.7 In this case, officers felt that the overall offer which technically policy compliant wasn't a particularly desirable option and so investigated alternative options for securing off site housing, which would increase the public benefit in terms of providing good quality and a greater amount of housing, recognising that if harm was identified the public benefits of the scheme would need to outweigh that.

9.8 Tybald's Estate is a council owned housing estate (see 'History') located between Great Ormond Street and Theobald's Road. The site obtained planning permission in 2014for an estate regeneration scheme which sought to deliver more affordable homes on the estate, their delivery being cross-subsidised by the provision of new private homes. That scheme has been implemented but a

number of plots have yet to be developed. Officers identified that these undeveloped plots might present an opportunity to act as a form of donor site to Euston Tower. The undeveloped plots are for 28 private homes (with a floor area of 2,491.5sqm), it was considered that if the developer would commit to fund the cost of delivery of all those units as affordable housing on the Tybald's Estate this would be more efficient in terms of housing delivery, as well as cost. The Tybald's option of off-site delivery is therefore considered to be a better than the William Road option of nine dwellings plus a payment-in-lieu.

9.9 Whilst it is always difficult to fully anticipate the costs of a future development, Officers have sought to obtain the most accurate figures with the assistance of the Council's CIP team. In arriving at a suitable value for the section 106 obligation for off-site delivery at the Tybald's Estate, it must satisfy the business case, which aims to deliver all phases and minimise borrowing. The original business case relies on the profit from private sales to be utilised to deliver the affordable homes and community benefits across the estate. Therefore, the Council's Community Investment Programme require funding in place of the 28 homes for sale and also funding to substitute for the profit/receipts they'd have received from the sale of these homes. The Council could have sold the Tybald's site to British Land for them to bring forward on their own, as off-site housing, but this would have resulted in the Council losing an asset. The retention of this site and a payment to the Council to flip units to affordable housing at Tybald's is a better option for the Council.

9.10 The calculation has taken account of the land value as well as the construction costs. Officers consider that a contribution of £28.7m is required for the Council to flip the 28 approved private homes to affordable housing.

9.11 If this alternative 'donor' option were not felt to be appropriate and we the Council did not want to accept William Road then the policy would cascade to a full payment-in-lieu, based on the formula set out in guidance this would be calculated as £18,749,250 (24,999sqm / 2 = 12,499.5sqm, PiL = 12,499.5 x £1,500 = £18,749,250). This is a material consideration that should be taken into account in negotiating the housing provision.

9.12 Officers have negotiated with the applicant and secured a contribution of £27m towards the provision of affordable housing at Tybald's Estate. Whilst this is slightly short of the required £28.7m figure, officers consider this a very good offer, which will help unlock the Tybald's development and provide much needed affordable housing in the south of the borough. Officers consider this a good package; much better than the William Road option or the full payment in lieu of £18.7M. This figure will allow the Council to deliver the remaining homes at Tybald's estate which is a major aspiration of the Council, and provide another 28 affordable homes in an area of very high demand.

9.13 The floorspace of the 28 new homes to be delivered at Tybald's Estate and to be flipped from market to affordable housing is 2,491.5sqm – short of the policy requirement for housing and also affordable housing of 6,250sqm. Officers did consider in view of that whether a Financial Viability Assessment should be provided but concluded that taking account of all the circumstances of this particular case it was not required. Whilst the proposed housing package for

Tybald's is not fully policy compliant on the basis of a donor site approach, in that it does not provide the full quantum of housing or affordable housing, it does enable the provision of more housing and more affordable housing than the either the initially offered William Road donor site plus the PIL or the full PIL which would technically have been considered policy compliant options.

9.14 Whilst the intention is for the section 106 obligation to specify that the £27m provided for affordable housing will be for delivery of homes on Tybald's Estate, flexibility will be built in to the obligation so that the money could be spent elsewhere if necessary. That eventuality is not something we want or envisage happening, but it must be included to cover the possibility of Tybald's not coming forward and to avoid a situation where the funding cannot be spent.

10 CONSERVATION AND HERITAGE

10.1 The conservation considerations are as follows:
- Policy review
- Site and significance
- Impact of Proposed Works on Significance
- Conclusion

Policy review

10.2 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

10.3 Section 72 (1) of the same Act provides that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas when exercising planning functions which may impact them.

10.4 Chapter 16 of the NPPF sets out the policies relating to the conservation and enhancement of the historic environment. Paragraph 207 specifies that "in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."

10.5 Paragraph 212 states that "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."

10.6 Paragraphs 212 and 213 provide a definition and the approach to harm which notes that "any harm to, or loss of, the significance of a designated heritage asset…should require clear and convincing justification."

10.7 Paragraph 215 ditto states that "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this

harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

10.8 The PPG on the Historic Environment (previously Conserving and Enhancing the Historic Environment) (2019) provides further guidance when assessing the impact of development proposals affecting heritage assets. It sets out that "significance" derives not only from a heritage asset's physical presence, but also from its setting. It sets out that "public benefits" may follow from many developments and could be anything that delivers economic, social or environmental objectives as described at Paragraph 8 of the NPPF.

Regional (London) Planning Policy

10.9 London Plan Policy HC1 (Heritage conservation and growth) outlines that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The policy is clear that the cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

10.10 London Plan Policy HC3 (Strategic Local Views) outlines a list of designated Strategic Views and states that "Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view." Part G of Policy HC3 states that boroughs should clearly identify important local views in their Local Plans and strategies; it states that local views should be protected and managed in a similar manner as Strategic Views.

10.11 London Plan Policy HC4 London View Management Framework relates specifically to London's designated Strategic Views.

10.12 London Plan Policy D8 (Public realm) states that development proposals should address visual impacts, including an analysis through long-range, mid-range and immediate views from the surrounding streets; architectural quality and materiality of an exemplary standard and consider nearby heritage assets and their settings.

10.13 London Plan Policy D9 (Tall buildings) states tall buildings should consider the visual impacts, specifically on long range, mid-range and immediate views from surrounding streets (part C (a)). Part C (d) of this policy states that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. It goes on to state that proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. Tall buildings should positively contribute to the character of the area.

10.14 The Site falls within LVMF View 2A.2 & 2B.1 from Parliament Hill and View 4A.2 from Primrose Hill and is technically visible in View 19.A1 from Lambeth Bridge. The LVMF SPG (2012) states that the scale of new developments should be compatible with the composition of these views. The guidance notes that

development in the background of the Palace of Westminster should preserve or enhance the viewer's ability to recognise and appreciate the strategically important landmark.

Local (LB Camden) Planning Policy

10.15 Policy D1 (Part M & R) (Design) of the Camden Local Plan states that high quality design within development proposals should preserve strategic and local views, as well the relationship between the building and hills and views.

10.16 The supporting text of Policy D1 (Paragraph 7.27) notes that LBC will protect the key views in accordance with London-wide policy and will resist proposals that would harm them. It is further stated that developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces.

10.17 Policy D2 (Heritage) of Camden's Local Plan states that LBC will preserve and where appropriate, enhance LB Camden's rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.

10.18 Paragraph 6.43 of the Camden Local Plan notes that LBC will continue to use guidance within conservation area appraisals and management strategies to preserve and enhance the built environment around Hampstead Heath and preserve outlooks and views from it, which include protected views from Parliament Hill to the Palace of Westminster.

10.19 Townscape and heritage issues were covered by reports forming part of the Environmental Statement.

<u>Site and significance</u>

10.20 The site is not a listed building and is not within a conservation area. The building has a Certificate of Immunity from listing (see '*History*' section).

10.21 It is within the setting of a very wide range of designated heritage assets.

10.22 The application documents include a Views Analysis and the Townscape, Visual and Built Heritage Impact Assessment TVBHA (Volume 2 of the ES) prepared by Tavernor Consultancy, which identifies the heritage assets affected by the development. In summary, the chief impact is on the Grade I & Grade II* listed buildings of Fitzroy Square and the Grade II listed BT Tower, both located to the south of the Site, as well as the Grade I Registered Park and Garden of Regent's Park to the west of the Site and its attendant listed buildings (including Park Crescent outside the park railings). It also has an impact on the setting of the Grade I listed church of Holy Trinity Marylebone Road (within Westminster).

10.23 The application documents also assess the proposals in respect of the character and quality of the surrounding townscape, key townscape views, notably LVMF 2A.2 & 2B.1 (Parliament Hill) and LVMF 4A.2 (Primrose Hill), and LVMF 19A.1 (Lambeth Bridge).

10.24 The significance of the listed buildings is very high. All listed buildings are of national significance, those at GI and GII* being of the highest level of national significance. The Grade I landscape (Registered Park and Garden, i.e. Regent's Park) is of the highest national significance.

Impact of Proposed Works on Significance

Setting of Heritage Assets

10.25 Within Camden the visual impact on heritage primarily affects designated heritage assets (Conservation Areas, Registered Park and Gardens, and Listed Buildings). Given the scale of the building the heritage impacts on setting of designated assets extend beyond the borough, and affected local authorities and relevant heritage bodies (chiefly Historic England) have been consulted accordingly.

10.26 A full analysis of the effects of the proposed development on designated heritage assets is included within the submitted Views Analysis and the Townscape Visual and Built Heritage Impact Assessment (TVBHIA) (Volume 2 of the ES) prepared by Tavernor Consultancy. The views and heritage assets identified in that document are agreed to be those required to properly assess the impact of the proposals in statutory terms under the following:

Wider heritage impact (townscape and views)

10.27 The application documents state that "the Euston Tower in its current form is not critically acclaimed as a distinguished work of architecture and has never been considered in detail for listing by Historic England. The interest of the Euston Tower is mainly for its role in the speculative commercial development boom of the 1960's. Architecturally it has some limited interest for its surviving original curtain walling and unusual pinwheel plan form, but its architectural quality is, at best, unremarkable."

10.28 While the Tower has been assessed for statutory designation and has been determined not to be of national significance, it is nonetheless of a strong architectural character representing a *Miesian* (architect Ludwig Mies van der Rohe) aesthetic (in contrast to the more *Seiffertian* (architect Richard Seiffert) aesthetic which would be imparted by the proposed works). The tower is within the visual setting of a wide range of listed buildings, most of which pre-date it. However, it also has a visual and cultural role in the setting of two post-war listed buildings in particular – the Post Office/BT Tower (GII listed) and Centre Point (GII listed). The proposed façade treatment does change the setting relationship of the Euston Tower to the two listed contemporary towers because it creates the impression of the Seiffert aesthetic being the more dominant context of the 1960s when this was not in fact the case. However, as noted above, the Euston Tower is not a listed building and the setting of listed buildings is prone to alteration as their unlisted neighbours are altered. Such alterations can cause harm to setting but in the case of very tall listed buildings in the centre of London the change to setting has been a constant since the mid-C20th. It is therefore difficult to conclude that the proposed alterations to the Euston Tower represent statutory harm to the setting of the BT Tower or Centre Point (even if the changes

do result in a distortion of the architectural reality of the mid-C20th townscape as originally built-out and the original visual context in which all of these buildings historically co-existed). It is also noted that the BT Tower, Centre Point and Euston Tower were built with very little, if any, deliberate aesthetic or stylistic reference one to another, and that they do not, as group, form a deliberately cross-referential skyscape.

10.29 Twenty-three views have been selected to assess the potential effects of the Proposed Development on visual amenity and townscape character which are then assessed under the Townscape, Visual and Built Heritage Assessment ('TVBHA,' Volume 2 of the Environmental Statement).

10.30 In terms of heritage impacts, it is noted that the existing Euston Tower is a well-established feature of the townscape setting of Bloomsbury, Fitzrovia and Regent's Park and a prominent landmark in views along Euston Road, Hampstead Road and Tottenham Court Road. Large swathes of these localities are designated as conservation areas and also contain very large concentrations of listed buildings.

10.31 Beyond this, the existing Euston Tower is clearly visible in the following LVMF views and therefore the Proposed Development would also be clearly visible in these views:

a. LVMF 2A.2: Parliament Hill: the summit; defining the left hand site of the Protected Vista
b. LVMF 2B.1: Parliament Hill: east of the summit; outside the Protected Vista
c. LVMF 4A.2: Primrose Hill: the summit; outside the Protected Vista

10.32 The TVBHIA concludes that the effects on LVMF London panoramas from Parliament Hill and Primrose Hill would be beneficial in nature but would not be significant. It states that "the Proposed Development would enhance the appearance of the existing Euston Tower and would form a high-quality landmark of comparable scale to the existing tower within the panorama." The extent to which the development would "enhance" the view is subjective, but it is agreed that the proposals would not have any impact on the views of the Palace of Westminster as confirmed by Historic England (dated 7 November 2023) which states that "in long-distance views, the height of the building would be comparable to the present tower, so, for example, would not encroach on LVMF views of the Palace of Westminster."

10.33 There are two assessment points upstream from Lambeth Bridge (LVMF 19A.1 and 19A.2.) A Protected Silhouette of the Palace of Westminster is applied at all points between Assessment Points 19A.1 and 19A.2.

10.34 The existing Euston Tower is technically visible but not perceptibly close to the east of Assessment Point 19A.1; the very top of the existing Euston Tower is technically visible at a low point between pinnacles on the Palace of Westminster but is seen at a distance of approximately 3.5km, and the potential visibility is well screened by foreground trees even in winter. There would be no perceptible change to the composition of LVMF River Prospect 19A and no effect on the Protected Silhouette of the Westminster WHS in views downstream from

Lambeth Bridge. This view is echoed by Historic England in their feedback dated 7 November 2023.

10.35 Several local views were also assessed and included within the TVBHA, which concludes that effects on non-designated local views would range from negligible to moderate in scale and would be either “beneficial or neutral” in nature. It is debatable if any of the impacts would be beneficial from a conservation perspective, but it is accepted that all would be neutral.

10.36 Officers noted the projected podium could block views of the listed Post Office (BT) Tower and suggested views from various points along Hampstead Road to determine the impact of the podium projection and ground floor realignment on its setting. Accordingly, a number of viewpoints have been assessed looking south down Hampstead Road (views 9, 10 and 11). These assess the proposal in the context of views to the Post Office Tower, i.e. the setting of a GII listed building. The increase in the footprint of the development on the Hampstead Road frontage, would partially reduce the visibility of the BT Tower over a length of about 100m at the northern end of Hampstead Road, however, the distinctive articulated silhouette of the Post Office Tower would remain legible and recognisable beyond the Proposed Development. The silhouette of the Post Office Tower is the more significant element of its special architectural interest in the context of its setting.

10.37 In summary, the impact of the proposed works are in accordance with national, regional, and local planning policies in relation to townscape and strategic viewing corridors.

Other Heritage Considerations

10.38 The existing building is not locally listed and is not located in a conservation area. An application for a Certificate of Immunity from Listing (‘COIL’) was submitted to Historic England in July 2023. This was granted (countersigned December 2023, Historic England ref: Case Number: 1488199).

10.39 Within about 500m of the site, there are seven conservation areas. These surrounding conservation areas lie within both the borough of Camden and, to the west, Westminster City Council. The impact of the proposed development on the three closest Conservation Areas is set out in the TVBHIA and summarised as follows.

10.40 Fitzroy Square Conservation Area (within LBC) is located to the south of the site. This Conservation Area is characterised by a Georgian Townscape with later C19th commercial and institutional architecture, however with the visibility of taller more modern townscape to the north along Euston Road and the south, notably the presence of the Post Office (BT) Tower. The TVBHIA concludes that while there is the potential for the proposed development to further detract from the ability to appreciate the significance of the conservation area, there is also the potential for some of the existing harm (caused in particular by the existing Euston Tower) to be mitigated by the design of the proposed development.

10.41 View 19 taken from Fitzroy Square looking north-east towards the Euston Tower has been assessed. Fitzroy Square is located in the Fitzroy Square Conservation

Area and is enclosed on all sides by Grade I and Grade II* Listed buildings (save for no.14 Fitzroy Square which is unlisted but obviously forms an integral element of the setting of all the other, listed, buildings).

While the scale of the impact of the proposed development on the view would be equivalent, the appearance of the Euston Tower would be noticeably changed. The applicant's assessment concludes that "there is the potential for some of the existing harm (caused in particular by the existing Euston Tower) to be mitigated by the design of the Proposed Development." Given the proximity of the Euston Tower to the brick and Portland stone façades of the Adam brothers' buildings in Fitzroy Square and its adjacent streets, the reflectivity of the extant tower cladding is not considered to provide much by way of visual mitigation. It results in skyline contrast more than reticence. It is accepted that the existing harm is not exacerbated and that the impact of the proposal on the setting of the conservation area and its attendant listed buildings is less than substantial.

10.42 The Bloomsbury Conservation Area lies to the south east of the site. Similarly with the Fitzroy Square CA, the contrast of the conservation area with parts of its now well-established post-war and modern setting along Euston Road highlights the fine grain and historic character of the historic townscape of the conservation area but the modern setting is not judged to make any material contribution to the appreciation of the heritage significance of the conservation area. The applicant's assessment concludes that "While there is the potential for the Proposed Development to further detract from the ability to appreciate the significance of the conservation area there is also the potential for some of the existing harm (caused in particular by the existing Euston Tower) to be mitigated by the design of the Proposed Development." It is accepted that the existing harm is not exacerbated and that the impact of the proposal on the setting of the conservation area and its attendant listed buildings is neutral.

10.43 View 18 has been taken from Bedford Square looking north towards Euston Tower. It is noted that the existing Euston Tower is partially visible above the roofline of these terraces. Given no additional height is proposed, part of the very top of the proposed development would also be seen behind the rooftop structure. The visibility of the proposed development would not intrude above the predominant foreground roof line or otherwise interrupt the ordered enclosure of the square or what remains of its historic silhouette against open sky. It would not therefore draw the eye or be a noticeable element in the backdrop of the square when compared to the extant condition and the impact upon the setting of the conservation area and its attendant listed buildings would be neutral.

10.44 In addition to the listed buildings within conservation areas and those mentioned elsewhere in this report, the GLA has found that the impact of the proposal upon the following heritage assets (within Camden) would be less than substantial harm (at a very low level): Number 131 Drummond Street and the Crown and Anchor Public House, Church of St Pancras (GI) and Euston Fire Station (GII*), due to the widening of the tower. This is also the view of the Council.

10.45 The impacts upon surrounding heritage assets is adequately covered in the townscape/views provided in the application documents. There is no instance where the proposed works can be said to cause any listed building or conservation area to suffer substantial harm to setting.

10.46 Regent's Park Conservation Areas (within LBC and WCC) lie to the west of the Proposed Development. It is noted that the scale and proximity of the modern setting (including the existing Euston Tower) seen above the treeline of the park, and the rooflines of the historic terraces in characterising views across the park, has eroded the ability to entirely appreciate the pastoral, picturesque intent of the original design and is considered to detract from the ability to appreciate the significance of the park. The Euston Tower is not the only building to cause this harm, the Post Office Tower also having a harmful impact on the original Nash design intent.

10.47 The applicant's assessment concludes that "there is also the potential for some of the existing harm (caused in particular by the existing Euston Tower) to be mitigated by the design of the proposed development." It is not accepted that the proposed works mitigate the existing harm to the setting of all heritage assets falling under the broad aegis of Regent's Park and environs. The Regent's Park CAAC has pointed out the fact that the existing Euston Tower already has some mitigation in its impact due to its tonality and reflective qualities, which enable it to respond to the dynamics of atmosphere in a manner which will be greatly reduced in the proposed scheme. Unlike with Fitzroy Square, there is more considerable physical distance between the stucco facades of Nash's terraces and the Tower where it does form more of a background skyline component. The existing cladding is certainly more dynamically reflective than the proposed cladding would be. There would therefore be a change when the proposed scheme is read in conjunction with the early C19th buildings against their eastern skyline. Given the above, there would be less than substantial harm to the Regent's Park Conservation Area and Regent's Park

10.48 The proposed works would also have an impact on the setting of the GI listed Park Crescent given the Euston Tower is currently visible in conjunction with those buildings. However, in the instance of Park Crescent the impact is considered to be neutral, because the base of the Tower is obscured by other tall buildings on the north side of Euston Road between the Hampstead Road junction and Park Crescent. This gives it tonal and visual perspective and dilution within a wider fragmented townscape. This is in contrast to views from Regent's Park proper where in most instances it is perceived to rise directly above the Nash terraces with no visual intermission from more modern buildings, juxtaposing it with the Nash facades and skyline in a much stronger visual contrast.

10.49 However, it is noted that a response from Historic England (dated 7 November 2023) recognises that "the present Euston Tower is already an assertive building in the setting of nearby heritage assets; it is alien to and detracts from the Fitzroy Square Conservation Area's historic scale and rooflines and imposes on otherwise semi-natural designed landscape views in some areas of Regent's Park."

10.50 The applicant's assessment concludes that "the existing levels of 'harm' to significance of local heritage assets, caused by the existing Euston Tower, would not be removed, or materially reduced by the proposed development. The proposed development would therefore continue to give rise to 'harm' in NPPF

terms to the significance of listed buildings and conservation areas in the study area. This harm is in all instances judged to be at the same scale as that caused by the existing Euston Tower, which is 'less than substantial', generally at the lower end of the scale but in some instances at the middle of that scale. Any perceived harm arising from the development would be less than substantial and outweighed by the substantial public benefits That the scheme brings forward in terms of housing provision, employment floorspace and the contribution to the KQ, architecture and the public realm.

Conclusion

10.51 It is agreed that none of the existing harm to heritage assets would be removed by the proposed development. Therefore, it does not, in statutory heritage terms, enhance. This conclusion is reached without prejudice to the consideration of the effect of the proposed changes with regard to the architecture of the building as a structure in its own right. It may be considered that there is aesthetic architectural enhancement to the building in its own right. This assessment is made only with regard to the statutory and policy requirements to assess the impact of the proposed development in relation to what is significant about the setting of the heritage assets affected by the proposed changes.

10.52 In almost all instances the impact is considered to be neutral when compared to the extant condition.

10.53 However, in the matter of the setting of the Regent's Park Conservation Area, Registered Park and Garden, and all its attendant listed buildings the harm caused to setting by the proposed development is slightly greater than the extant condition. This is due to the increased "thickness" of the silhouette which is perceptible in the long view over the Nash terraces, the detailing of the upper storeys in contrast to the body of the Tower (compared to the lower degree of contrast between crown and body on the extant façade) and the decrease of reflectivity by the superimposition of a masonry grid structure.

10.54 It is therefore concluded that main impact of the development is one of neutral impact on heritage settings. The chief alteration of the heritage impact of the proposed development is the moderate exacerbation of less than substantial harm to the setting of the Regent's Park Conservation Area, the setting of the Regent's Park Registered Park and Garden and the setting of essentially all the listed buildings within the Regent's Park Conservation area when and where viewed in conjunction with the Euston Tower and the setting of the Fitzroy Square Conservation Area and its listed buildings.

10.55 The buildings where setting is chiefly affected by the proposed changes are:

- Albany Terrace GI
- Cumberland Terrace GI
- Cambridge Terrace GI
- Cambridge Gate GII
- Chester Terrace GI
- Gloucester Gate GI
- St Katherine's GII*

- Royal College of Physicians GI

10.56 In the setting of these buildings, and in the setting of the Grade I Registered Landscape of The Regent's Park the proposed works cause less than substantial harm.

11 URBAN DESIGN

11.1 The urban design considerations are follows:

- Policy review
- Existing tower
- Design process (including Design Review Panel)
- Form and mass
- Local views
- Wider views
- Details and materials
- Re-use and adaptation

Policy review

11.2 Camden Local Plan policies D1, D2 and CPG (Design) and LP policy 2 (Design and character) are relevant to the consideration of design when assessing planning applications. The CLP identifies the Euston Area, which the tower is adjacent too, as one of the Growth Areas of Camden where most significant growth is expected to be concentrated. The Euston Area Plan expects significant development in the Euston Area. LP Policies D3, D4, D5, D8, and D9 are also relevant.

Existing tower

11.3 Completed in 1970, the existing 36-storey tower was designed by the architects Sidney Kaye, Eric Firmin & Partners in the 'International Style'. It became an early home to Capital Radio and is a landmark building due to its height, at 124.5m, and highly visible location at the northern end of Tottenham Court Road. It is the second tallest building in LB Camden, just taller than Centre Point (120m) and shorter only to the BT Tower (188m). The tower sits on a square two-storey podium base of 50.6m width by 50.6m depth with louvred canopies on the west, south and eastern edges that project a further 4.2m. These were added in the 2000s to assist with wind mitigation. The tower has a pinwheel plan and is clad in aluminium curtain walling with green reflective tinted glazing. The plan arrangement is a distinctive aspect of the tower's form and appearance, suiting the cellular office layouts common at the time and helping to bring elegance to the elevations by breaking them into separate planes. The overall width of the plan is 48.3m with an overall depth of 48.3m, however due to the plan form, this is experienced as a series of pinwheel wings of 14.2m width by 24.4m depth.

11.4 The public realm to the west of the tower, known as Regent's Place Plaza is 40-60m width and 60m deep.

Design Process inc. Design Review Panel

11.5 The design development of the proposals has been undertaken in pre-application meetings with LB Camden Planning and Design officers, and there was one DRP

prior to submission in August 2022. A planning application was made in December 2023, with further DRP meetings being held during 2024 to negotiate the design, revisions to the application were subsequently submitted in December 2024. The design has been reviewed three times altogether by the Camden Design Review Panel (DRP), twice prior to the original design as submitted in the application and once (in August 2024) on the revised design.

11.6 During this time, many aspects of the design have developed following feedback from LB Camden officers. These include; squaring the plan to reduce massing on Hampstead Road, changing to a form of 4 equal quadrants to simplify the form, recessing the central 'spine' to visually slim the form, increasing the solidity of the façade to improve environmental performance, regularising the façade to visually calm, curving of the corners to soften the profile, increasing the prominence of the crown at the top of the building and changing to a lighter colour to improve the appearance.

11.7 The panel of the most recent DRP in August 2024 welcomed '*the revised proposals for redevelopment of Euston Tower, and thinks these are a significant improvement on the submitted scheme. The revised massing, façade design and materials create a silhouette and appearance that fit better within the townscape'.* They raised a number of recommendations to be addressed in the revised submission, which are summarised as:

- Firm commitments for the deconstruction and reuse of materials to give confidence that these aspirations will be achieved.
- Demonstrating flexibility for the building to accommodate different uses in future will be essential as part of the sustainability strategy.
- Further thought about the architecture of the podium element to achieve a more welcoming, civic presence at street level, and to better stitch it into its immediate surroundings. They suggested that the plinth could be taller.
- Refinement of the architecture at the top of the tower to give it greater distinctiveness in long distance views.

11.8 Further to the DRP, the applicant undertook further meetings with Council officers and the above points have been addressed in the revised submission and subsequent information issued.

<u>Form and mass</u>

11.9 The building proposal is formed of a podium of 6 storeys and a tower of 26 storeys on top, reaching a height of 125.5m. This is a fractional increase of 1m in height from the existing tower.

Tower

11.10 The tower has a rectangular plan form of 50m width by 53m depth. This shape has been divided into four quadrants, with full height inset 'spines' of 2m width in the centre of each facade at the joint between the quadrants. These vertical elements house the tower's mechanical air handling equipment, simultaneously celebrating the function of the mechanical spaces, whilst also helping to provide distinction between the two halves of each elevation. At the top of the tower, the spines are set in further, so as to provide a clear break between the quadrants.

This serves to interpret the single tower as four distinct elements as an aesthetic device to read more verticality to the massing.

11.11 The corners have been softened with a radiused curve, which helps to dissolve the edges of the tower to visually lighten the form and reinforce the aesthetic reading of a tower made up of four quadrants. The repeating of this feature gives each elevation an equal importance. to form a building that has no primary “front” or “back,” but rather a cohesive presence from all perspectives. The outer corners have a similar radius to the inner corners, strengthening the impression of the four quadrants being independent and improving the vertical reading.

11.12 Four double-height amenity spaces are provided across the tower. As the spaces are located at the corners of the building, it ensures that two amenity spaces are visible from each elevation. The glazing is setback 2.7m – 4.9m from the edge, allowing for a planted perimeter.

11.13 Within the proposed tower, typical upper floors are 3.8m floor to floor, compared to 3.2m within the existing tower. In lower lab-enabled floors (L03-11), 4.080m floor to floor heights allow for the additional servicing required.

11.14 At the top of the tower, a ‘crown’ of 8.55m height sits on top of each of the quadrants. This is formed of a glazed section of 6.4m with the façade mullions extended from lower floors, topped with a solid summit of 2.15m height made up of horizontal bands. The horizontal section is formed of an upturned version of the typical façade, with a stacked appearance of bands to give further expression and prominence. This top hides mechanical plant equipment, which is located at roof level with ventilation provided through the stacked band features. This screens all plant from visibility and gives the top of the tower a suitably sized summit that will be appreciated in wider views.

Podium

11.15 At 24.6m height and made up of 6 storeys, the podium acts as a base to the building, creating a direct scale on the pavement akin to the typical heights of local buildings. This brings benefits both visually, in avoiding the full scale of the building directly on the street, and environmentally in assisting with wind downdraft. The use of curved corners creates a softer form and replicates the feature from the tower above.

11.16 The podium is wider in plan than the tower above. The podium has a width of 57.4m, with a depth of 57.4m, with an undercut at ground level formed by a plan of 53.5m width and depth 48.7. The overhang of this is 6.7m in height, but varies in depth between 2.2m and 4.2m on the south (on Euston Road), 1.6m and 3.1m to the east (on Hampstead Road), 4.4m to the north (on Brock Street) and nominally to the west. Overhangs are deeper at entrances, which are typically set in from the main building line. Compared to the existing podium, this is a slight reduction in public realm on the southern edge with the building line pushed further south by 1.5m, with an overhang that is 1.5m further south than the existing louvres. On the eastern edge, the proposed building line is slightly inset from the existing, with further public realm at corners where entrances are recessed. The overhang is 1.4m less than the existing louvres. On the northern edge, the proposed building line is set in by 3.4m from the existing to create a

greater width to Brock Street at ground level, although due to obstructions from structure and cycle stands this width increase is more realistically 2m. The overhang is 1m further than the existing building line, causing a minor narrowing in the public realm open to sky.

11.17 The extent of the overhangs is considered acceptable as a minor increase on the existing condition. The proportional scale (6.7m height against 1.6 - 4.2m) of the overhang limits the feeling of walking beneath a building to maintain an open character to the public realm around the perimeter, whilst giving potential to provide shelter from the weather.

11.18 In conclusion, as described above, the form and mass of the proposal are considered to comply with the requirements of Local Plan Policy D1 Design.

11.19 The proposal features entrances and ground floor glazing to the building on all four sides of the development. The commercial entrances are located on the south west and south east corners, with glazing to the lobby running along the entire southern elevation. The Enterprise Space has extensive glazing to Hampstead Road, a primary entrance on the north-east corner, and a secondary entrance with neighbouring glazing on to Brock Street. The café on Level 01 has a terrace and glazing facing west, with an accessible route up to this level. This distribution of entrances will promote movement through the site and in combination with the glazing will contribute positively to active street frontages.

Local views (excluding those covered in the 'Conservation and heritage' section above)

11.20 The views of the tower from the local area are of particular importance in assessing how the building relates to its surroundings both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline, in accordance with Policy D1(m).

11.21 From the north on Hampstead Road, the existing Euston Tower and BT Tower are both visible in southern views between Hampstead Road Bridge and the site. Due to the increased width of the proposal compared to the existing condition, the extent of this paired visibility will reduce. This causes the BT Tower to be completely obscured for about 100m of Hampstead Road, and then partially visible until approximately the junction with North Gower Street, 250m north of the site.

11.22 From the east, along Drummond Street (applicant view 12) the increased bulk of the tower is apparent. With foreground buildings obscuring the podium, the architectural treatment plays an important role in breaking the massing. Wider views from the east and west along Euston Road show a tower of increased breadth, however the calm nature of the elevations will help to mute the impacts to the background.

11.23 From the south on Tottenham Court Road, the existing tower has a dominant presence at the northern end of the street, marking the junction with Euston Road. The proposal has a slight widening in profile and perceived height, due to the southern façade becoming closer. Whilst wider, the design clearly locates the

tower on the western side of the street so that the continuation of a route north on Hampstead Road is maintained. The increase in size raises the importance of the proposal as a high quality design that is respectful of its context. From this perspective, it acts as a counter to Centre Point at the southern end of Tottenham Court Road. The design for Euston Tower has been developed with reference to Centre Point, and so it can be considered as having been successful in this regard.

Wider views

11.24 Despite no significant increase in height from the existing tower, due to the height of the proposal there are views from considerable distances that require assessment in accordance with Policy D1 (m) regarding *preserving strategic views; (p). how the top of a tall building affects the skyline and ® the relationship between the building and hills and views.*

11.25 Views from Regent's Park have been assessed. From the locations in this open space, the width of the proposed development is an increase on the existing. This increases its impact on the open skyline, however the light colouration and façade design assist with balancing the impression on the viewer by being more similar in tone with the sky.

11.26 The view from Park Village East (EAP View 12) demonstrates a very similar impact to the existing tower.

11.27 In conclusion, the proposed development has a similar impact to the existing tower in most of the wider views, except for those highlighted in the 'Conservation and heritage' section above. Where the increased width is apparent, the impact of this is relieved by the lighter cladding and curved corners that help to blend the tower with the sky.

Details and materials

Tower

11.28 The proposed cladding to the tower is intentionally simple and repetitive to provide a calm appearance. The main façade geometry is of vertical lines spaced on a 3m grid extending up the full height of the tower, interrupting a horizontal shading shelf that sits over the glazing on all floors. The vertical lines draw the eye upwards and are slim in profile to provide a visual lightness. The verticals are 0.7m width that gives sufficient solidity, but with a projecting section of 0.16m width by 0.29m depth that serves to give a thinner reading of the profile, giving an aesthetic lightness and enhancing the verticality. At the head of the glazing at each level, the verticals blend into the horizontal shading element, softening and providing detail to the façade. On the corners, the verticals follow the curve of the plan, with the horizonal shading curved to add to the soft appearance of the corner. It has been designed to be calm with an appropriate level of solidity at 50%, which provides a good balance of internal daylighting whilst limiting overheating. The horizontal has a height of 1.5m and ability to self-shade due to its 0.8m depth. The glazing sits of a 0.4m upstand on typical floors, which assists with limiting solar gain and hiding the potential clutter within the office along the façade edge.

11.29 The spines in the centre of each facade provide a location for ventilation whilst continuing the vertical character. They are formed of a series of storey height vertical sections of 0.15m width, a similar dimension to the projecting verticals of the typical facades, with gaps of 0.18m. These dimensions give them a suitable scale to be fitting with the size of the tower. The front spines cover the weather louvres set 0.33m behind, which will not be readable. The spines fold inwards at the crown of the building.

11.30 The proposed material for the tower façade is a Glass Reinforced Concrete (GRC) cladding. The colour of this is off-white, with a subtle texture achieved through the aggregate to give a warmth. This colour gives a lightness to the appearance and is considered to be appropriate to the context, both locally and in reference to Centre Point at the southern end of Tottenham Court Road. The selection of GRC for the facade offers the potential for a sculptural and robust external surface. An objection was received raising concern on how GRC would weather. The durability and aging process of GRC is comparable to a quality architectural pre-cast concrete, ensuring a lasting and resilient façade.

11.31 The glazing specification would be secured by condition, to ensure that the shading achieves a glass that has a relatively high 'G-value', meaning that it will appear clear.

11.32 The new structure will be a steel frame, with the floor deck in concrete – either a composite metal deck or using solid precast planks. The proposal is informed by the potential future adaption.

Podium

11.33 The design of the podium reflects its role as the base of the tower, mediating between the scale of the tower and the height of the local buildings. As such, the architectural design plays its part through details and materials that are similar with the tower, but informed by the context. The façade employs a repeating concave profile that extends around the 4 elevations. This allows the differing parts, such as windows, ventilation grilles and open wind mitigation, to be held within a singular language that provides an appropriately sturdy base to the tower above. The concave profile is tallest at the top and bottom of the cantilevered podium, and wraps around the entire form to imply a strength to the form and identify as an urban block. The windows are simply expressed as square openings, but with a subtle hierarchy up the height of the podium. On the western elevation, the podium slopes down to ground, meeting the landscape and giving an accessible route to the public café on Level 01. This gesture helps to successfully ground the building, activate the public space to the west and give a civic presence to the podium.

11.34 The majority of the podium is clad in a red Glass-Reinforced Concrete (GRC), reflecting the tones found locally particularly within the area. Accents around windows using lighter material give a layered reading to the openings, adding visual interest and giving a contemporary take on the features in local institutional buildings. Texture, including fluting is cast in to the GRC to give a materiality that compliments local character. The red GRC continues to ground, providing a visual support to the projecting podium above. Ground level window openings include a solid upstand to give a durable base, with planting included on the south

and eastern elevations. Where entrances are located, lighter coloured cladding forms clear legibility.

11.35 In conclusion, the proposed details and materials are deemed to comply with the relevant requirements of Local Plan Policy D1 Design.

Re-use and adaptation

11.36 The proposed development includes for retention of the existing foundations, basement and central core, equating to 31% of the existing structure. The applicant has made significant progress in surveying and recording the existing building to establish how to achieve their commitment to '*partial deconstruction, and a pioneering approach to recycling and use of low carbon materials*'. The primary materials for inclusion in the deconstruction and/or repurposing are concrete, glass, aluminium and steel.

11.37 In accordance with Policy D1 (d) development is required to be *adaptable to different activities and land uses*. Whilst the applicant provided limited information on this within the application submission, they have subsequently submitted drawn information on the potential for adaption. This information has sought to show that it would not be impossible for the proposed building to be converted to residential. Whilst not impossible, it is unlikely that such a conversion would deliver the best quality housing because of the deep floorplates, but we do consider it would be possible for future conversion to a hotel or educational use.

11.38 Further details on the materials, including the exact colour and finish of the GRC and glazing specification, and architectural details will be secured within the conditions. This will include large format samples of the facade including all facing materials and typical details.

11.39 An Access Statement has been submitted as part of this application.

11.40 Building Control were consulted on this application and have reviewed the access statement and consider it satisfactory for the purposes of the building regulations. Access provisions would be further developed at detailed design RIBA Stage 3/4 but the principles of access into and egress from building have been established in accordance with requirements.

12 NATURE CONSERVATION, OPEN SPACE LANDSCAPE AND BIODIVERSITY

12.1 The nature conservation, landscape and biodiversity considerations are follows:

- Policy review
- Introduction
- Open Space
- Trees and landscaping
- Biodiversity
- Conclusion

Policy review

12.2 London Plan policy D8 (Public realm) states that new development proposals should seek to create new public realm and that the public realm should be of a high quality. The Camden Local Plan policies A2 (Open space) and A3 (Biodiversity) and Camden CPG Biodiversity seek to protect existing trees, secure additional trees and vegetation and to protect and promote biodiversity.

Introduction

12.3 A Landscaping Statement, a Biodiversity Net Gain Assessment, landscaping plans and an Arboricultural Impact Assessment were submitted as part of this application. A Nature Conservation Officer and a Tree and Landscape Officer have reviewed these documents.

12.4 The site includes Regent's Place Plaza, to the west of the Euston Tower as well as the perimeter of the tower on its other sides.

12.5 The proposed landscaping features soil mounds and tree planting.

Open space

12.6 Camden's Public Open Space CPG requires the proposed development to provide 379sqm of open space, given the proposed increased in commercial floorspace on the site. Under the proposals, 5,788sqm of open space would be provided, an increase of 394sqm from the landscaped ramp up to the podium entrance. There would also be a marked qualitative improvement in landscaping in terms of reducing hardstanding areas and planting.

Trees and landscaping

12.7 Twenty trees and three tree groups would be felled under the proposals. The groups of trees consist of tightly spaced trees planted in regular formation in raised beds. As a group they do have significant amenity value, hence category B - but individually, less so. The majority of the trees on the site sit within tree pits and have limited scope to grow further and have a limited life expectancy. Two trees would be retained on site.

Tree grade	**BS5837:2012 definition**	**No. of trees**
A	High quality, est. remaining life span of >40 yrs	1
B	Moderate quality, est. remaining life span of >20 yrs Plus 3 groups of lime growing in raised beds	18 26
C	Low quality, est. remaining life span of >10 yrs or below 150mm diameter	1
U	Poor quality, est. remaining life span of <10 yrs	0

	TOTAL	20 – 46 including groups of trees

Figure 10. Trees to be removed

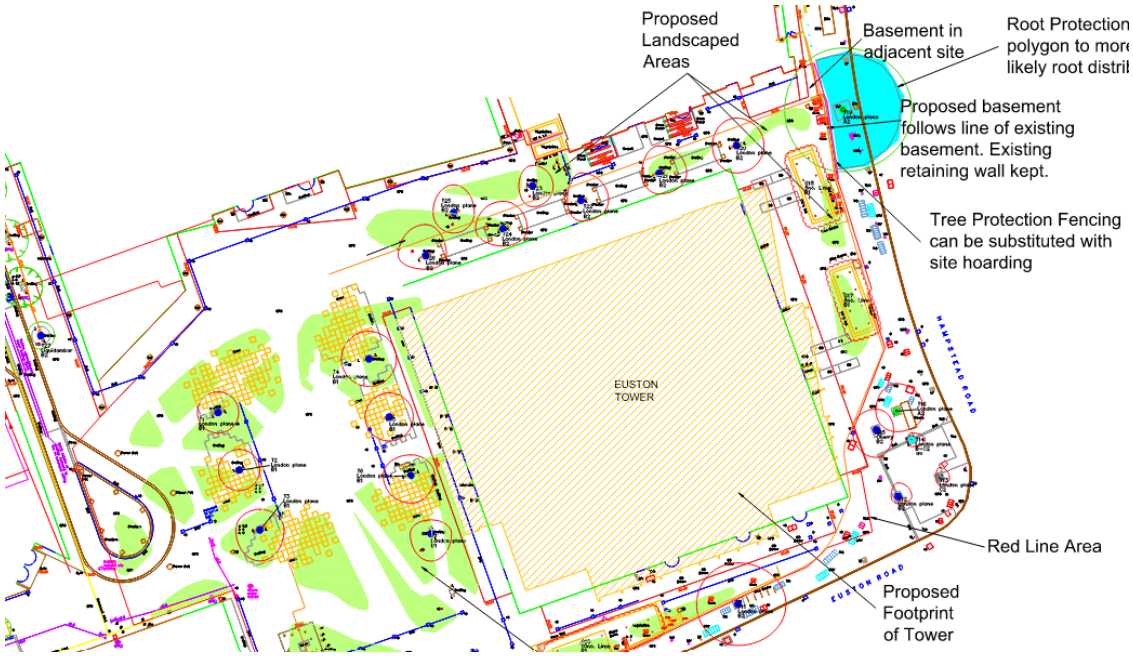


Figure 11 – Plan showing trees on the site for removal – circled in red

12.8 120 trees are proposed, of a variety of species including native species, which is welcomed. The canopy cover shows a vast increase in canopy cover between existing and proposed which is welcomed. British native trees have been selected; Birch, Scots Pine, Rowan, Hawthorn (multistems), and Holly. To heighten the natural feeling of the landscape, the trees would be planted at a variety of different sizes, similar to how they would be found in nature, with young trees and saplings alongside larger specimens. The proposed native tree mix is welcomed but further improvements could be made by reducing the numbers of birch trees and incorporating others e.g. field maple, cherry - both of which are suitable for the site and in keeping with the overall design objectives. The landscaping plan is conditioned and officers will ensure a better mix is secured here.

12.9 However, the Council's Tree Planting Strategy seeks to diversify tree species for biodiversity reasons, particularly in the south where London Plane is over-dominant and officers consider the tree planting could be further diversified. A condition is therefore attached requiring a Landscaping Plan including details of tree species. A condition is also attached requesting a Tree Protection and Replacement Strategy.

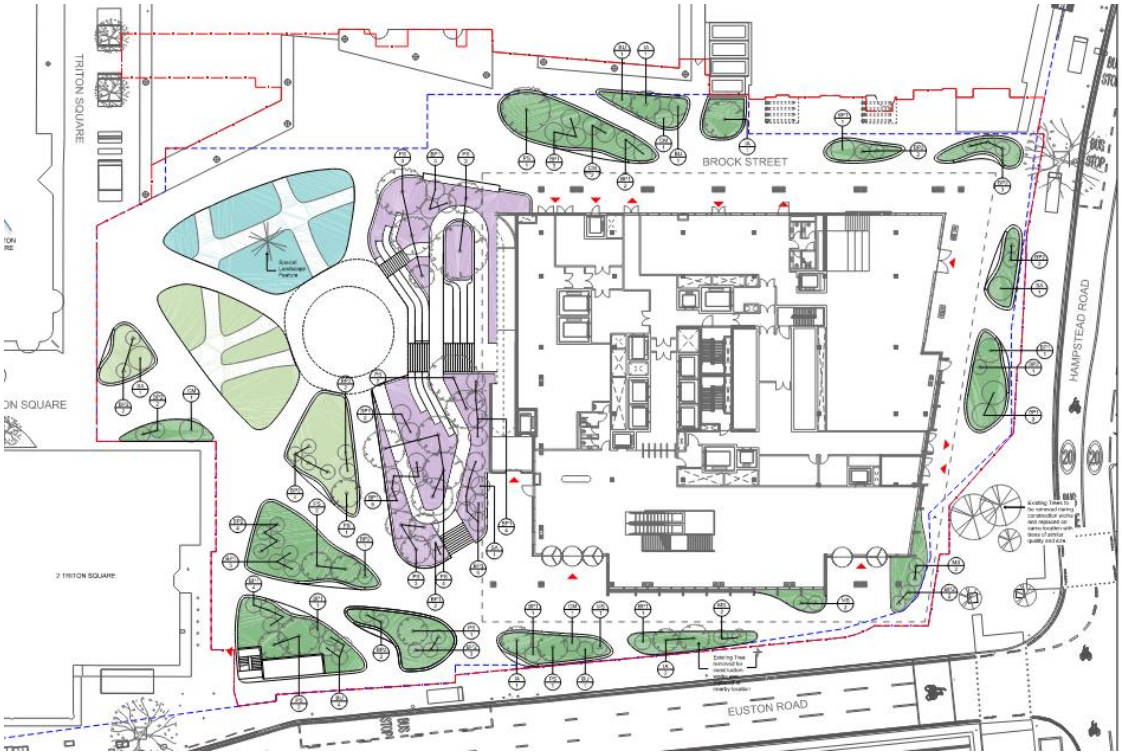


Figure 12. Proposed landscpaing plan (indicative)

12.10 There would be a significant increase in trees under the proposals – with the removal of twenty and the planting of 120 trees. The proposals are welcomed in arboricultural terms.

Landscaping

12.11 The public realm improvements and proposed podium provide the most direct opportunity for successful integration with the context.

12.12 The landscape improvements can be defined as four areas, reflecting the four sides of the podium.

12.13 To the west, the proposed design for Regent's Place Plaza centres around an array of landscape elements encircling a civic square. Stairs from the podium integrate into the landscape, extending the public realm and connecting the ground level with the first-floor podium through planting. The inclusion of tree planting along the stairs further extends the site's green potential vertically. At the core of the plaza lies a shallow waterplay feature serving as both a splash pad and reflective pool. This feature is programmable to adapt to changing climates and user preferences. It can be fully drained to create open space in the square. In the north-west are two wetland beds with accessible boardwalk crossings. The freshwater wetland, positioned to the north, maintains a permanent body of water, while the riparian wetland to the south allows for periodic flooding during storm events. Both beds are designed with submergent and emergent vegetation to foster biodiversity.

12.14 The landscape along Euston Road has been designed to accommodate a wide range of users while responding to a number of critical conditions. The area hosts two of the buildings main entrances as well as the low gradient stepped entrance

to the cycle store in the basement. Eastbound cycle lanes and a bus stop border the site along Euston Road. A 4.5m clear width has been introduced as a shared pedestrian and cycle lane, connecting from the south-east corner and running north towards Triton Street. The east-west footway will be maintained and the narrow condition around the bus stop to the west will be improved. A staggered arrangement of the mounds create a buffer of vegetation, effectively shielding the central plaza from the noise, pollution, and windy conditions to the south.

12.15 On Hampstead Road, landscaped mounds have been placed to respond to micro-climatic conditions and work to buffer pedestrians from the adjacent traffic.

12.16 The widening of Brock St has enabled greening, with landscape mounds acting as bookends to the street. Consideration has been made to accommodate the anticipated increase of pedestrian journeys, whilst also improving its landscape character, recognising its increased importance as an east-west thoroughfare should HS2 proposals come forward.

12.17 A condition is attached requiring full details of landscaping (as mentioned above). A section 106 obligation on pedestrian, cyclist and environmental improvements would be secured for improvements in the public realm in the area, outside of the site.

12.18 The landscaping under the proposals would be a significant improvement upon the existing situation, which has a corporate feel and includes much hardstanding. Officers consider this a significant benefit for the local community.

Biodiversity

12.19 This application was submitted before the 12th of February 2024 and therefore Biodiversity Net Gain (BNG) is not applicable. Nevertheless, the biodiversity of the site would be markedly improved under the proposals, given the landscaping and planting proposed.

12.20 London Plan policy G5 (Urban greening) set a target of 0.3 for the Urban Greening Factor (UGF). The UGF is a land-use planning tool to help determine the amount of greening required in new developments. At present, the site has a low UGF of just 0.16. Under the proposals, the UGF of the site would be increased to 0.3 in line with policy G5.

12.21 The proposed UGF levels are welcomed.

Conclusion

12.22 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms. The proposals would enhance the natural value of the site.

13 AMENITY OF NEIGHBOURING PROPERTIES

13.1 The considerations on the impact on the amenity of the occupiers of neighbouring properties are as follows:

- Policy review
- Introduction

- Daylight and sunlight
- Loss of privacy
- Noise

Policy review

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

13.3 London Plan policy D9 about tall buildings says that daylight and sunlight conditions in the neighbourhood must be carefully considered.

13.4 Noise issues and daylight and sunlight issues were covered by reports forming part of the Environmental Statement.

Introduction

13.5 The closest residential properties are located to the north, on Drummond Street and Hampstead Road. There are also residential properties to the south, across Euston Road, and to the east, across Hampstead Road.

Daylight and sunlight

13.6 A Daylight and Sunlight Assessment was submitted as part of the application. An updated assessment was submitted in December 2024, following revisions being made to the proposal during the course of the application.

13.7 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.

13.8 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

13.9 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.

13.10 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).

13.11 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.

13.12 The BRE guide sets out an approach for dealing with EIA development and this is reflected in the Environmental Statement which accompanies the application. The BRE standard numerical guidelines have been applied to establish the number of impacts on each property (or group of properties) that are within the guidelines and the number that are outside the guidelines. To assist understanding 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 13 – Categorisation of magnitudes of effect

13.13 Appendix H of the BRE guide provides guidance for use in EIAs to determine the significance of effect ('negligible', 'minor', 'moderate', and 'major' adverse). Whilst the Application is not EIA development, the guidelines are nonetheless helpful in understanding the significance of the effects of the development. Significance takes into account the number of impacts that are outside the BRE guidelines, the magnitude of the impacts and the margin by which they are outside, the sensitivity of the receptors (in terms of the strength of their requirement for daylight and sunlight), whether the receptors have other sources of light and whether there are particular reasons why an alternative, less stringent, guideline should be applied.

13.14 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context. The BRE standards need to be applied flexibly, taking into account broadly comparable typologies within the area and across London, in accordance with the London Plan Housing SPG. Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative negative impact on the VSC, and on the area receiving direct skylight. Where there are balconies which can cause obstruction, the BRE guidelines suggest modelling the impacts with and without the balconies. This allows you to test whether the presence of the balcony or overhanding walkway, rather than the size of the new obstruction (the proposed development), is the main factor in the relative loss of light.

<u>Assessment</u>

13.15 The map below shows the location of the surrounding properties tested. The neighbouring residential properties have all been assessed in terms of daylight for both VSC (Vertical Sky Component) and NSL (No Sky Line) and with regards sunlight for APSH (Annual Probable Sunlight Hours).

Daylight

13.16 The following 28 properties have residential accommodation or student accommodation and were tested for daylight/sunlight impacts from the development:

1. 17 to 33 William Road
2. Schafer House, University College
3. 164-166 Drummond Street
4. 175 Drummond Street
5. Triton Building
6. 40-60 Hampstead Road
7. 1-6 Tolmers Square

8. 183 North Gower Street
9. Warren Court, Euston Road
10. 301-305 Euston Road & 69-70 Warren Street
11. Lizmans House, 321 Euston Road
12. 56 Warren Street
13. 57 Warren Street
14. 58 Warren Street
15. 59 Warren Street
16. 60-61 Warren Street
17. 62 Warren Street
18. 63-68 Warren Street
19. 71 Warren Street
20. 9 Warren Street
21. 10 Warren Street
22. 11 Warren Street
23. 12 Warren Street
24. 13-14 Warren Street & 118-120 Whitfield Street
25. 15 Warren Street & 161 Whitfield Street
26. 16 Warren Street
27. 17 Warren Street
28. Duchess House, 18-19 Warren Street

13.17 22 of the above properties tested were fully compliant with BRE guidelines and only experience a negligible effect in daylight terms based on the maximum parameters, and are therefore not discussed further.

13.18 The remaining six buildings are all to the north or west of the site and are discussed below in turn.

2 - Schafer House, University College
3 - 164-166 Drummond Street
4 - 175 Drummond Street
5 - Triton Building (20 Brock Street)
6 - 40-60 Hampstead Road
7 - 1-6 Tolmers Square

Figure 14. Location of surrounding properties tested

Schafer House, University College (2)

13.19 This building is located to the north of the site and is occupied by student accommodation. 162 windows, serving 150 rooms were tested here. All 162 windows comply with BRE guidance with regards VSC. Only one of the 150 rooms tested would not comply with BRE guidance with regards NSL. This room is a bedroom and the drop in NSL would be 22% - a low magnitude impact, only just above the 20% guidance.

13.20 Given the above, only one room would experience a minor impact and would not suffer unacceptable harm.

164-166 Drummond Street (3)

13.21 This building is also located to the north of the site and is in residential use. 51 windows serving 17 rooms were assessed. All 51 windows complied with BRE guidelines regarding VSC. With regards NSL, 13 rooms passed and four did not fully comply. These four rooms would experience a minor impact of between 21% and 26%. All of these rooms are bedrooms, which are considered to be less critical in terms of light needs than living rooms or dining rooms because of the manner in which they are used. All rooms comply with BRE guidelines in terms of APSH.

13.22 Given the above, these properties would experience only minor impacts and would not suffer unacceptable harm.

175 Drummond Street (4)

13.23 This building is also located to the north of the site and is in residential use (with retail use at ground floor level). 14 windows serving 14 rooms were assessed. All 14 windows complied with BRE guidelines regarding VSC. With regards NSL, ten rooms passed and four did not fully comply. These four rooms would experience a minor impact of between 22% and 28%. All of these rooms are bedrooms, which are considered to be less critical in terms of light needs than living rooms or dining rooms because of the manner in which they are used.

13.24 Given the above, these properties would experience only minor impacts and would not suffer unacceptable harm.

Triton Building (20 Brock Street) (5)

13.25 This building is located to the north of the Euston Tower, across Brock Street. The Triton Building houses a number of flats. 296 windows serving 140 habitable rooms were assessed. 287 of the 296 windows would comply with BRE guidelines. Of the 12 rooms served by windows that would not comply with the BRE guidelines on VSC, all of these would experience a minor transgression between 21-23%. These rooms all have overhanging balconies. An alternative assessment was undertaken, removing the balconies, where all windows passed. All rooms where APSH is applicable would comply with BRE guidelines.

13.26 Given the above, these properties would experience only minor impacts and would not suffer unacceptable harm.

40-60 Hampstead Road (6)

13.27 This building is located to the north-east of the site, across Hampstead Road, and is in residential use, with some commercial uses at ground floor level. 62 windows serving 60 habitable rooms were assessed. 50 of the 62 windows would comply with BRE guidelines regarding VSC. Of the 12 windows that would not comply, two would experience moderate negative transgressions between 30-40% of their former value. The remaining ten windows would experience major negative transgressions of over 40%. These losses are as follows:

- 100% x 6

- 80%
- 56.25%
- 50%
- 47.37%.

13.28 It should be noted that where there is a loss of 100% or 80%, that these figures are so high because of their incredibly low existing VSC; 0.01% - 0.07%.

13.29 With regards NSL, 49 rooms passed and eleven did not fully comply. Of these eleven rooms, one would experience a minor impact of 24.1%, two would experience a moderate loss of 30% to 40% and eight would see major transgressions of 40% or more. These eight windows would receive to following losses:

- 100% x 6
- 53.4%
- 48.7%.

13.30 As with the VSC, when the losses are 100%, this is due to the incredibly low existing NSL. The actual loss in NSL is small; between 0.1% and 5.2%.

13.31 The reason that a number of windows and rooms have very low existing VSC's and NSL's is due to the existence of walkways and overhangs above the windows. In situations such as this, small absolute changes in Daylight and Sunlight levels can easily result in larger and disproportionate changes. An assessment has been carried out, removing the walkways and overhangs, in line with BRE Guidance. Once these have been removed, all of the windows would fully comply with BRE guidance.

Tolmer Square (7)

13.32 This building is located to the east of the site, across Hampstead Road and behind 40-60 Hampstead Road. This building is in residential use. 95 windows serving 61 habitable rooms were assessed. 89 of the 95 windows would comply with BRE guidelines regarding VSC. Of the six windows that would not comply, four would experience minor negative transgressions between 20-30% of their former value, one would experience a transgression of 33% and the other a transgression of 40%. However, the highest absolute change to these windows in terms of VSC is 0.11% which would not be noticeable to occupants.

13.33 With regards NSL, all 61 rooms would comply with BRE guidelines.

13.34 In terms of APSH, all of the rooms would comply.

Loss of privacy

13.35 There are no residential properties immediately adjacent to the proposed tower. The nearest residential accommodation is located at an oblique angle to the north-east, across Brock Street. However, the accommodation directly to the north-east is in commercial use. There are sufficient separation distances, also at oblique angles, for the nearest windows serving residential properties.

Figure 15 – separation distances to nearest neighbouring buildings

13.36 The proposed tower will not result in a material impact in terms of overlooking.

Noise

13.37 Plant is proposed in the 30th and 31st storeys. Heating and cooling will be provided to the development by central heating and cooling plant consisting of air-cooled chillers and simultaneous air source heat pumps (ASHPs) to maximise the ability to share heat between spaces within the building.

13.38 A noise assessment has been submitted by the applicant as part of the application submission. Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, BS 4142:2014 "Methods for rating and assessing industrial and commercial sound".

13.39 The plant noise criteria have been adequately predicted, taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.

13.40 The assessment indicates that the proposed plant should be capable of achieving the proposed environmental noise criteria at the nearest and potentially most affected noise sensitive receptors.

13.41 A Noise Officer has been consulted and is satisfied that the submitted acoustic submission meets the Council's local plan guidelines and therefore acceptable in environmental health terms, subject to conditions.

14 HEALTH IMPACT

14.1 Camden Local Plan policy C1 seeks to promote strong, vibrant, and healthy communities. A Health Impact Assessment (HIA) has been carried out by the

applicant and the findings of the assessment have been submitted as part of this application. The Proposed Development's potential health impact has been assessed based on the HUDU Planning for Health Rapid HIA Tool.

14.2 The submitted HIA finds that there would be a number of positive health impacts from the development, with the provision of new homes off-site, including affordable housing, a car free development and improved landscaping. There would be an increase in employment under the proposals, which is also a positive health impact. People on low-incomes or unemployed would particularly benefit from the provision of affordable housing, as well as increased levels of employment. The proposals have been designed to minimise crime and fear of crime, which disproportionately affects women and the elderly.

14.3 To mitigate potential negative health impact from construction impacts in terms of noise, dust and pollution, a Construction Management Plan would be secured via section 106 agreement.

14.4 No negative health impacts were highlighted in the HIA. No financial contributions regarding health impact are therefore required.

15 BASEMENT IMPACT

15.1 Camden Local Plan policy A5 (Basements) seek to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.

15.2 The site is subject to two underground constraints on site - slope stability and subterranean groundwater flow.

15.3 There is an existing basement storey under the building. This would be used for back of house facilities such as cycle parking, showers and waste storage. Two blue badge car parking spaces would also be located here. Under the proposals, the basement would be extended downwards to create a second level of basement (-2), which would be occupied by plant. This would be a narrow strip with a floor area of just 168sqm, underneath the existing basement storey.

15.4 The application was accompanied by a Basement Impact Assessment. This assessment found that all of the properties that were tested were predicted to experience building damage no worse than Burland Category 1 ('very slight'), which is just aesthetic damage rather than structural damage and complies with policy.

15.5 An independent review was carried out by the Council's basement consultant (Campbell Reith) who reviewed the Basement Impact and Structural Impact Assessment for potential impact on land stability and local ground and surface water conditions arising from basement development in accordance with Camden's policies and technical procedures.

15.6 Campbell Reith concluded that the BIA is adequate and in accordance with the criteria laid out in policy A5 and guidance contained in CPG Basements and Lightwells. The BIA has identified the impacts of the basement proposals on

stability and the water environment are either acceptable or could be mitigated sufficiently to be acceptable. The detailed monitoring scheme and contingency actions will be prepared on the basis of the final detailed design and will form part of the BCP. The proposed basement is therefore considered acceptable, subject to a Section 106 obligation requiring a Basement Construction Plan (BCP).

16 AIR QUALITY

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

16.2 An Air Quality Assessment (AQA) has been submitted as part of this application which was assessed by an Air Quality Officer. Air quality issues were covered by reports forming part of the Environmental Statement.

16.3 The development is located in an Air Quality Focus Area but whilst the development likely to be used by large numbers of people, it is not expected that they would be particularly vulnerable to poor air quality, such as children or older people.

16.4 Emergency Generators are proposed, given the proposed lab-enabled use. A condition is attached requiring this to be over 1m. Laboratory flues are proposed for ventilation. A condition is attached requiring full details of these. Heat and hot water for the development would be provided via an all-electric system comprising Air-Source Heat Pumps (ASHPs).

16.5 The proposals are car-free, and are Air Quality Neutral.

16.6 The proposals are considered acceptable in terms of air quality subject to conditions on diesel back-up generators.

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

17 MICROCLIMATE

17.1 Policy A1 of the Camden Local Plan 2017 acknowledges the impact that large developments can have on the local climate. CPG Amenity requires new developments to consider the local wind environment, local temperature, overshadowing and glare both on and off site.

17.2 Wind and microclimate issues were covered by reports forming part of the Environmental Statement.

17.3 Additional guidance from TfL's Healthy Streets for London recommends that streets should design in opportunities for sun, shade, and shelter from high winds to create places that can be enjoyed all year round.

17.4 Policy A2 of the Local Plan recognises that the quality of open spaces is closely linked to the degree to which it is overshadowed.

17.5 The microclimatic impact of a tall building on its local environment at ground level as a result of increased wind speeds is an important area of assessment of the acceptability of the proposed tower. An updated assessment of the Wind Microclimate addendum was submitted as part of the planning application, following revisions to the design of the tower. The assessment compares the existing baseline conditions of the existing Euston Tower with the proposed tower to determine the wind conditions in the surrounding area if the proposed building were to be constructed. The Lawson Comfort Criteria has been used to assess the existing and proposed microclimatic conditions.

17.6 At present, the public realm around the tower experiences high levels of wind. Bolt-on canopies and landscaping have been implemented over the last twenty years to try to improve the situation.

17.7 The proposals seek to improve the wind microclimatic conditions on the site and in the area.

17.8 The proposed tall building has been designed so that there are no flush, sheer facades which would channel wind downwards. The podium would disrupt downward drafts. Ground floor entrances to the proposed tower are located under the podium overhang to ensure comfort for pedestrians entering and leaving. Landscaped mounds and planting would be utilised to further disperse wind at ground level.

17.9 The wind microclimate report concludes that with the proposed development including the landscaping in place, the level of windiness would be less than the existing level. The level of windiness would be suitable for pedestrian activities and is acceptable. Given the orientation, with Regent's Place Plaza to the west of the tower, there will be no material impact in terms of overshadowing. The building has been designed to minimise glare.

18 SUSTAINABLE DESIGN AND CONSTRUCTION

18.1 The sustainable design and construction considerations are as follows:

- Introduction and policy review
- Demolition/deconstruction of the existing building
- Redevelopment strategy
- Whole Life Carbon
- Energy and carbon reductions
- Climate change adaption and sustainable design
- Conclusion

Introduction and Policy Review

18.2 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.

18.3 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development

should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage. Further details of each policy are set out in relevant sections below.

18.4 A Sustainability Statement, Demolition Feasibility Study, Circular Economy Statement and Energy Statement have been submitted as part of this application. Demolition and construction issues were covered by reports forming part of the Environmental Statement.

Demolition/deconstruction of the existing building

18.5 The development plan policies in the Camden Local Plan and London Plan encourage resource efficiency through conversion, reuse and adaption of existing buildings, particularly Local Plan policy CC1(e) which states the council will require all proposals that involve substantial demolition to demonstrate it is not possible to retain and improve the existing building. The development plan echoes the NPPF, at paragraph 161, which says planning should support a transition to a low carbon future by contributing to radical reductions in greenhouse gas emissions and encouraging reuse of existing resources, including buildings.

18.6 Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a low carbon and circular economy, where materials, products and assets are kept at their highest value.

18.7 The London Plan provides a hierarchy for building approaches, with diminishing returns released moving through refurbishment and re-use through to the recycling of materials produced by the building or demolition process.

18.8 London Plan (2021) Policy SI 7 in terms of circular economy requirements and a Circular Economy Statement accompanies this planning application.

18.9 A Retention & Redevelopment Options Review has been submitted as part of this application, including a pre-redevelopment audit. This information has been reviewed by officers as well as Hilson Moran and Elliott Wood who were appointed by the Council's to provide an independent third-party review.

18.10 Under the proposals, 31% of the structure would be retained in situ by volume (25% by structure) and the rest demolished.

18.11 Inclusive Economy have confirmed that there remains a demand for high-spec offices. Officers acknowledge that the existing tower would need investment to bring it up to modern office standards and even then it may not be of sufficient quality to attract an occupier because of the 'flight to quality'. Alongside this the existing floor-to-ceiling heights of the existing building are insufficient for lab-enabled space which would constrain the nature of the spaces which could be provided and the type of KQ occupiers who could be accommodated. The existing façade would also need replacing.

Redevelopment strategy

18.12 Policy CC1 of CLP requires that proposals that involve substantial demolition demonstrate that it is not possible to retain and improve the existing building. The policy does not state that the demolition of existing buildings is unacceptable, but requires that in all cases consideration must be given to the refurbishment and reuse of the building before demolition is accepted. The London Plan states at Policy SI 7 that the redevelopment of sites should minimise the use of new materials and follow circular economy principles.

18.13 Taking into account the condition of the existing building and feasibility of re-use, it is necessary to use the following hierarchy to explore options for the existing site, with the aim of optimising resource efficiency. All options should achieve maximum possible reductions for carbon dioxide emissions and include adaptation measures, in accordance with the Council's Development Plan and CPG.

I. Refit
II. Refurbish
III. Substantial refurbishment and extension
IV. Reclaim and recycle.

18.14 Due to the potential substantial demolition the applicant was advised from early pre app meetings to ensure that they had fully considered Policy CC1 e) require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and f) expect all developments to optimise resource efficiency. They were also advised that further guidance CPG Energy Efficiency and Adaptation chapter 9 should be followed. Subsequently a Feasibility Study was undertaken in three parts: Volume One: Assessing the Existing Building; Study Volume Two: Pathways for Alternative uses; Volume Three: Options for Retention and Extension. The options considered were "*studied for delivering the project vision, generating additional value, while retaining as much of the existing building as possible*" were:

- Major Refurbishment
- Retention and Partial Extension (Max Retention)
- Retention and Extension ("Full" Retention)
- Partial Retention and Extension (Disassemble and Reuse)
  - Retain consecutive slabs (office)
  - Retain consecutive slabs (office and lab-enabled)
  - Retain interstitial slabs (office)
  - Retain interstitial slabs (office and lab-enabled)
  - Retain the core
- New Build

18.15 The conclusion of the Feasibility Study states "*the 'Retain the Core' option is identified to be preferable. This is because it offers the best balance of structural retention, quality, flexibility (it does not bake in many of the limitations of the existing building), and adaptability (to different users and uses). And it does so with a whole life-cycle carbon position that is the lowest of the options that deliver*

the quality of space which is necessary for the redevelopment of Euston Tower to be successful."

18.16 Elliott Wood/Hilson Moran were commissioned to undertake an "Independent review of pre-planning Feasibility Study (Volumes 1-3)". The Independent Review states that they "*recognise the amount of work that has gone into the Feasibility Study. Given the high-profile nature of the application, this level of diligence is expected. However, the Applicant Team have provided substantial and detailed information within the Feasibility Study for the options presented*." Whilst recognising the substantial detail in the study they did ask for clarification on issues such as targets for embodied and operational carbon, detailed information and methods for temporary works, further detail of the proposed façade and associated embodied carbon and inclusion of uncertainty / contingency factors for embodied carbon figures.

18.17 The Independent Review further summarises that three potential uses for the existing building were explored: Commercial-led developments; Residential / mixed-use developments; Hotel / student accommodation developments. It states that "*From a technical perspective it was confirmed that the building could be converted to either residential use, hotel or student accommodation. In the case of residential uses the Applicant Team concluded that 'the cost of such a conversion relative to value achieved is highly prohibitive to financial viability'. Conversion to 100% hotel was ruled out due to lack of operator or investor interest. Neither a fully residential nor a student accommodation only scheme have been considered due to 'poor air quality at the lower levels of the tower'. A mix of either hotel and residential or hotel and student accommodation has been ruled out due to the cost of such a conversion relative to the value achieved being prohibitive to financial viability*." "*With regards to a commercial-led development the Feasibility Study argues that a major refurbishment, with minimal demolition and no extension of the floorplate, is not financially viable. Therefore, to make the development viable remodelling of the existing building (including demolition and extension) is required.*"

18.18 The Independent Review considers the question of whether the proposed extent of demolition is acceptable. "*The main argument for demolition of the existing floor slabs is that the floor-to-ceiling heights and internal layouts are sub-optimal for the contemporary office rental market." "If lab space is a driver for the future use of the building, additional floor-to-floor height will be required over and above the contemporary office requirement*".

18.19 The Independent Review states "*The basis of Policy CC1 (as with similar policies across London) is to encourage reuse of existing buildings. As an industry we have little chance of meeting our carbon targets without reusing a significant number of buildings, however the issue is a complex one. As such, we need to start questioning the assumptions we are making with regards to what is classed as 'optimal' and 'sub-optimal'. The existing building can meet the BCO guidance for floor-to-ceiling heights in refurbished buildings. However, we understand and appreciate that it will be extremely difficult to extend the existing floorplates and achieve BCO guidance for clear floor-to-ceiling heights in these extended areas. We also acknowledge that there is little point in either leaving buildings*

unoccupied or delivering a large quantum of office floor space that does not meet BCO guidance."

18.20 The Independent Review concludes "*From a policy and environmental perspective, a major refurbishment (or retention and partial extension) would be the preferred solution. However, if this is not financially viable, of all the options put forward in the Feasibility Study we agree that the most realistic is to retain the core. This option attempts to provide a compromise position and is less impactful than a completely new build option. All other options for partial retention and extension pose significant problems, from a viability and/or technical perspective. The substantial amount of temporary works involved in these options (particularly propping slab edges) is challenging both in terms of the embodied carbon associated with these works and the complexity of the potential build programme (and the health and safety risks)*." "*Overall the Applicant Team have covered an acceptable range of development options and have come to a justifiable conclusion with regards to the extent of the demolition proposed*."

18.21 Officers' view is that a light touch refurbishments of the existing offices isn't realistic because there is a limited demand for that type of space and we want to deliver high quality offices with spaces suitable for a range of KQ occupiers. A substantial redevelopment offers the best opportunity to meet that objective.

18.22 The development plan promotes circular economy principles and local plan policy CC1 and London Plan policy SI7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building and to optimise resource efficiency.

18.23 The London Plan Policy SI 7 looks to reduce waste and support the circular economy by keeping products and materials at their highest use for as long as possible.

18.24 Officers consider that demolition/deconstruction has been justified in this instance, and therefore resource-efficiency m be optimised and a Whole Life Carbon (WLC) assessment is required to show that any replacement building has considered the carbon impact of the construction and use of the building over its lifetime. This should be in line with the GLA WLC assessment guidance and benchmarks.

18.25 There is a 20% target for reuse of materials.

18.26 A Circular Economy Statement and GLA Circular Economy reporting spreadsheet have been provided which includes a Pre demolition Audit and a Bill of Materials. In this case, the proposals seek to retain 31% of the existing structure by volume including the existing foundation, basement and central core. The proposed super structure is lightweight steel to minimise loads on the existing and new foundations with a focus on rationalisation and material use reduction.

18.27 In terms of the design of the new building the Circular Economy Statement states "*All reinforcement bar contained in the superstructure concrete elements will contain high proportions of recycled content (ca. 98% recycled content)…*

ambition that all structural steel elements, except connections, plate, and any fabricated elements, are to be procured as Electric Arc Furnace (EAF) steel with high recycled content (above 90%)…where the structural spans allow for it, the aim is to procure reused steel elements... subject to availability of supply and will have to be procured on a just-in-time basis. Actions to implement these measures will include early engagement with the supply chains to mitigate procurement risks so far as possible". Further "*The steel frame is designed to use elements of standard dimensions, and with bolted connections to enable future disassembly and reduce waste at deconstruction*". "*The facade is designed with standard dimensions and modularity, to enable off-site pre-fabrication of repetitive elements. This minimises construction waste… standardised facade components will aid in-use upgrades and reuse. The facade system is designed with mechanical fasteners (between elements), and bolted connections to the structure to minimise waste during deconstruction. This optimises the potential for future reuse and recycling." "The number of AHUs is chosen to obviate the need for underfloor ventilation ductwork... No terminal units …reduces waste as terminal units are often replaced during fit-outs. The absence of on-floor ductwork and minimal high-level servicing, enables changeable layouts without generating MEP waste.*" "*The data for key reusable products will be collected and stored in a Material Passport*". Officers welcome this approach.

18.28 The proposed development is targeting 98% of the demolition waste to be diverted from landfill, 96% of the construction waste to be diverted from landfill and 95% of excavation waste to be put to beneficial use and should be secured through condition. The proposals also include a Strategy for Material Recovery to support material reuse and recycling at the highest value. It is recommended that a pre-demolition audit prior to commencement is submitted to review and identify all materials within the building and document how they will be managed in line with the waste hierarchy, with potential providers for the reclaimed materials. This should demonstrate that the re-use of materials has been fully explored on site and that circular economy principles have been applied in accordance with Policy CC1 and the London Plan. A post-completion demolition and waste audit will also be requested to ensure the plan for managing materials has been implemented.

18.29 The Circular Economy statement states that "*Of the 70,309 tonnes of materials, 11,511 tonnes are of recycled content. This makes up 24% recycled content by value. This does not include material retained in-situ from the existing building (foundations and central core*)." This would meet the 20% target.

Whole life carbon

18.30 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building's life.

18.31 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).

18.32 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are "regulated emissions" and so are considered separately and in detail in relation to the zero-carbon target (see the "Energy and carbon reductions" section below).

18.33 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).

18.34 Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again at the end of its life (when it decomposes), so it is included in the total A-C-Modules.

18.35 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square metre of gross internal area in kilograms of carbon equivalent ($kgCO_2e/m^2$ GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The table below shows how the development performs against the benchmarks, as well as the aspirational targets.

WLC summary for OFFICES

Modules	Min benchmark for OFFICE ($kgCO_2e/m^2$ GIA)	Aspirational Benchmark for OFFICE ($kgCO_2e$/m2 GIA)	Proposal ($kgCO_2e/m^2$ GIA)
A1-A5	<950	<600	703
B-C (excl B6 & B7)	<450	<370	537
Total A-C (ex B6&B7 inc sequestration)	<1400	<970	1225

Figure 16 - Summary of Whole-Life Carbon results for the office development

18.36 In this case, the development is expected to meet the minimum benchmarks for modules A1-A5 and overall whole life carbon total including sequestration but will not meet the aspirational benchmarks. It is also noted that they do not expect to meet the minimum benchmark for offices for modules B-C which is stated to be largely due to the extent of MEP (mechanical and electrical plant) including those proposed for the lab enabled spaces (which make up 30% of the proposal). The benchmarks are for standard offices rather than lab enabled offices which are understood to generally have higher whole life carbon impacts due to the need for additional MEP, and additional structural support to prevent vibration which are not reflected in the benchmarks as shown in the table below above. It does

not meet the aspirational benchmarks. A condition is attached to make sure a post construction assessment of WLC is completed and provided for monitoring and compliance.

Energy and carbon reductions

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

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

Energy and carbon summary

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

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	14.6%
Be green stage (renewables): CLP policy CC1	20%	1.2%
Total carbon reduction: LP policy SI2 and LP CC1	35%	15.6 %

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

18.40 The operational carbon savings and measures set out below will be secured under an Energy and Sustainability Strategy secured by Section 106 legal agreement which includes monitoring, in compliance with the development plan. The S106 obligation will commit them to achieve the targets that they have set, but will require them to use reasonable endeavours to improve on those targets, recognising that the constraints of the building mean it is unlikely it will ever met the policy requirement.

Total carbon reductions

18.41 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the Building Regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.

18.42 This is charged at £95/tonne CO2/yr (over a 30-year period) which is 251.236 tonnes x £95 x 30 years = £716,023. This amount will be spent on delivery of carbon reduction measures in the borough.

18.43 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHP) for non-residential developments. In addition a tall building is also likely to have a high energy demand relative to the potential roof space for solar PV.

18.44 In this case, the development does not meet the policy target of 35% reductions, achieving an overall on-site reduction of 15.6% below Part L requirements as shown in Table X above. The carbon offset of £716,023 will be secured by Section 106 legal agreement to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

18.45 London Plan policy SI 2 sets a policy target of at least a 15% reduction through reduced energy demand for non residential developments at the first stage of the energy hierarchy.

18.46 In this case, the development almost meets the policy target of 15%, reducing emissions by 14.6% at this stage through energy efficient design, in compliance with the development plan. The proposals include LED throughout, good air tightness (3m3/hr.m2), all electric systems Air Source Heat Pump (ASHP), waste heat to hot water, on floor Air Handling Unit's enable shutting off unoccupied floors and peak cooling topped up by air cooled chillers (higher efficiency cooling than ASHP when no simultaneous heating load). Low g-value 0.3 of glazing to limit peak solar gain to acceptable levels and some exposed thermal mass. The proposals have not assumed natural ventilation (but potential allowed). However the proposed curtain walling is significantly less thermally efficient than a wall would be required to be under building regulations limiting values and is expected to have a similar efficiency to a window (max of 1.6W/(m2.K) for curtain walling or windows vs 0.26 W/(m2.K) for wall).The proposed curtain wall system is more efficient than the baseline for curtain walling in Building Regulations at 1.24W/m2.K but the inclusion of curtain walling rather than other facades impacts on the overall thermal efficiency of the building. The Energy Statement states that numerous façade options were explored. A Façade Embodied Carbon Study was provided which states that "*The unitised curtain wall system was selected as it is lightweight and best balances performance and buildability. While pre-cast and UHPC systems were considered, they would have required external face sealing, increasing the need for work at height. The unitised system can be installed directly from the floorplate and therefore mitigates these risks*."

18.47 It is not clear on what basis the natural ventilation option would be delivered for the development. Page 13 of the Energy Strategy states this will be explored at the next stage and the applicant has advised that natural ventilation will be *"...subject to further testing of operational viability, the impact on firefighting systems and embodied carbon at RIBA Stage 3 and 4. The applicant will continue to review all ventilation options and potential energy savings through the detailed design stages*." A condition is recommended to secure details and ensure that the proposals are fully considered and will deliver energy savings in operation.

Be clean stage (decentralised energy supply)

18.48 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network. The site is located in a Heat Network Priority Area and should therefore have a communal low-temperature heating system.

18.49 In this case an assessment of the existing London heat map has been made and a proposed route is shown running along Euston Road and Hampstead Road. The Energy Strategy states that … "*it is proposed that the pipework sleeves be allowed in the East side of the basement for a connection into a future main along Hampstead Road. The final location and detailing of these connections will be decided in future design stages*". It further states *"Sleeves through the basement walls will be provided to allow pipework to pass through and connect into a future district heating network. Suitable space in the basement area will be allocated for the installation of heat exchangers as may be required in the future for heat network connection*." The applicant has confirmed that the "*air source heat pumps are the main source of heat, which operate at temperatures of 45/40^{o}C and are compatible with a future heat network*". Future proofing for future heat network connection should be secured through section 106.

Be green stage (renewables)

18.50 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.

18.51 In this case, the development does not meet the policy target of 20%, reducing emissions by 1.2% at this stage through renewables, in compliance with the development plan. The proposal includes consideration of variety of technologies for renewable energy with solar PV and air source heat pumps considered to be the only feasible options. Ground source heat pumps were not considered feasible due to the retention of the existing basement slab. Limited space is stated to be available for Solar PV space due to demands on roof space. Consideration was made to additional PV on the 'open void' areas but these are steep slopes with directions blades with a passive design to drive air into the chillers to improve their efficiencies so are not considered suitable for additional PV. Given the proposals do not meet the 20% Be Green target and the long build time of this scale of development and expected further consideration of PV at stage 4, therefore a conditionis recommended for at least the proposed 63 panels with a capacity of 23.31kWp to be delivered and for Solar PV potential to be reassessed at future design stage to ensure high efficiency and maximum coverage The proposal includes low carbon heating through Air Source Heat Pumps (ASHPs) which are proposed on the roof of the building.

Be seen (energy monitoring)

18.52 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting. The proposal includes has proposed a building management system.

18.53 The Energy and Sustainability Strategy secured by Section 106 legal agreement will secure reporting to the GLA in line with their published guidance.

Climate change adaptation and sustainable design

18.54 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. A BREEAM Pre Assessment has been undertaken and the retail areas are not expected to meet the requirement for BREEAM Excellent (70%) or the requirement for 60% of available credits for Energy. The overall Very Good score (63%) with 7.69% for Energy is stated to be due to the ground floor retail spaces having large areas of glazing which have a higher solar gain (lower g-value) as solar coatings are reduced to allow customers to see in and out of the retail areas which increases cooling demand. In addition as the proposals are for shell and core then efficient building services are not considered which could offset the poor building fabric performance. The retail areas are expected to achieve 100% of the available Water credits and 70% of the available Materials credits which meet those requirements. A section 106 obligation is attached requiring the applicant to use reasonable endeavours to improve upon these scores.

18.55 The Office areas which make up a majority of the building area achieve BREEAM Excellent (87.9%), 86% of the available credits for Energy, 70% for Water and 69% for Materials which all meet and exceed the requirements and should be secured through s106.

18.56 With regards the cooling hierarchy, this has been considered with low g-value 0.3 of glazing to limit peak solar gain to acceptable levels and some exposed thermal mass but has not assumed natural ventilation (but potential allowed). The cooling hierarchy requires consideration of passive ventilation where feasible unless constrained (for example in Laboratories). The office floors should have natural ventilation unless proven to not be feasible. Further details are also required on the external blind integrated into the Closed Cavity Façade. The area weighted average (MJ/m2) and total (MJ/year) cooling demand for the actual and notional building has been provided (as per GLA guidance) and the applicant has demonstrated that the actual building's cooling demand is lower than the notional. Condition xx is recommended to ensure that the cooling hierarchy has been followed (including passive ventilation where feasible) and the thermal comfort level has been achieved.

18.57 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.

18.58 Flood risk is covered in the 'Flood risk and drainage' section of this report.

Conclusion

18.59 Whilst refurbishment of the existing building is considered technically possible and would be the most sustainable option, it is recognised that it is not likely to be a viable option and would not deliver the type of employment space for which there is

the highest demand in the Knowledge Quarter. The form of the building (an isolated tall building) and design requirements for lab-enabled offices mean higher whole life carbon and operational carbon impacts which do not meet all the policy requirements. The building could not be described as exemplar in terms of sustainability but if performs as well as, if not better, than other similar development and therefore the proposals are considered acceptable in terms of sustainability subject to conditions.

19 FLOOD RISK AND DRAINAGE

19.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS).

19.2 The whole of Camden including the site is located within Flood Zone 1 and therefore there is no risk of flooding by rivers and the sea as defined by the Environment Agency. The site is not on a previously flooded street or in a Local Flood Risk Zone. However recently updated national surface water flood risk maps indicate that there is currently a high risk in the vicinity and an increased surface water flood risk in the vicinity and to the site in the future. The site is also located in an area where there is potential for groundwater flooding of properties situated below ground level, and at the surface.

19.3 A Flood Risk Assessment, Drainage and SuDS Report and addendums have been submitted and considered by the Lead Local Flood Authority (LLFA). The submitted documents include a SuDS pro-forma, drainage calculations and attenuation details, evidence of correspondence with Thames Water, exceedance flow routes, a Flood Risk Emergency Plan and maintenance tasks with ownership. Further details which demonstrate the rain gardens and rainwater harvesting features in the drainage drawing with the outfalls, control points and levels, evidence to demonstrate that the latest rainfall data (FEH22) has been used in the calculations and also the greenfield, existing and proposed runoff volumes for the 1 in 100yr (6hr) storm event have not been provided. A condition is attached requiring further details with regards SuDS.

19.4 Rainwater harvesting, rain gardens, and a 380m3 attenuation tank are proposed. A run off rate of 39l/s for a 1 in 100 year rainfall event is proposed which is higher than the greenfield run off rate of 3.9l/s but is a reduction from 123l/s for the existing site. It is stated that the 380m3 attenuation tank proposed to be provided in the basement is “the maximum feasible due to outlined site constraints”. A site constraints plan has been requested but has not been provided to the LLFA to demonstrate that it is unfeasible to restrict the proposed runoff rates any lower than currently proposed. Given the location in an area of high surface water risk the run off from the site should be managed as close to greenfield run off rate as possible. A condition is recommended to secure the further details requested and ensure that the run off rate is as close to greenfield as possible but no more than the proposed 39l/s.

19.5 The Lead Local Flood Authority is happy with the proposals subject to conditions on SuDS. Given the above, the proposed measures are considered acceptable in terms of flood risk.

20 FIRE SAFETY

20.1 Policy D12 of the London Plan requires the application to be accompanied by a fire statement, prepared by a suitably qualified third-party assessor. London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users.

20.2 A Fire Statement has been submitted as part of the application, which demonstrates the ability to comply with Building Regulations (although formal sign of this does not sit with planning. This statement has been prepared and approved by a suitably qualified consultant and addresses the requirements of London Plan policy D12 (B). An Automatic Sprinkler System, two fire escapes, two central firefighting shafts and passive fire resistance measures would be employed. Building Control have reviewed the statement and consider it satisfactory for the purposes of the London Plan D5 and D12 Fire Safety Policies. A condition is attached ensuring compliance with the submitted Fire Statement.

21 TRANSPORT

21.1 The following transport considerations are covered below:

- Policy review
- Site location and access to public transport
- Trip generation
- Travel planning
- Access and permeability
- Public realm
- Cycle parking
- Car parking and vehicle access
- Construction management
- Deliveries and servicing
- Transport Assessment
- Highway works
- Pedestrian, Cycling and Environmental Improvements
- Micro and shared mobility Improvements

Policy review

21.2 Policy T1 of the Local Plan 2017 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.

21.3 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.

21.4 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 our objectives, policies, and measures for achieving this goal.

21.5 Our 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.

21.6 In 2023 the Council reviewed progress so far on the CTS and also set out its delivery plan for the period covering 2024/25.

i. introduce a segregated cycle route in at least one direction, possibly two, along the length of Albany Street segregated cycle corridor (primary route), which form part of a borough wide *'Healthy Routes - strategic cycling corridors'* programme of works, and the southern extent of which falls within 500m of the proposed site;
ii. deliver the wider Regent's Park Area Safe & Healthy Streets programme, for which extensive stakeholder engagement activities took place in 2023, the scheme area of which is in the immediate vicinity of the site;
iii. implement Euston Road corridor and junction improvements, led by TfL with support from the Council, which form part of HS2 works and longer term Euston Healthy Streets vision and which directly borders the site;,
iv. continue to expand our dockless bike and e-scooter hire network, including for locations in the immediate vicinity of the site, and
v. to contribute in delivering the above schemes towards the implementation of the CTS Cycling, Walking & Accessibility, EVCP and Road Safety Action Plans.

21.7 Camden's Clean Air Action Plan and Climate Action Plan also contain policies which are relevant to our transport observations.

21.8 London Plan policies on transport of relevance include:

- Policy T1 (Strategic approach to transport)
- Policy T2 (Healthy Streets)
- Policy T3 (Transport capacity, connectivity, and safeguarding)
- Policy T4 (Assessing and mitigating transport impacts)
- Policy T5 (Cycling)
- Policy T6 (Car parking)
- Policy T7 (Deliveries, servicing, and construction)
- Policy T9 (Funding transport infrastructure through planning)

21.9 London Plan Policy T1 (Strategic approach to transport) states that Development Plans should support, and development proposals should facilitate, the delivery

of the Mayor's strategic target of 95% per cent of all trips in central London to be made by foot, cycle, or public transport by 2041.

21.10 London Plan Policy T1 also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

21.11 The Council has developed a Freight and Servicing Action Plan (FSAP) to support safe, clean and efficient deliveries, freight and servicing operations in theborough. It will help us meet the objectives in the Camden Transport Strategy.

21.12 The site sits within the Knowledge Quarter area – King's Cross, St. Pancras, Euston, Bloomsbury. One of the four strategic priorities of KQ2050 is *'to identify and support work that improves our local environment, creating a great place for people to live, work and visit'*. The strategy further states '*This strategic area requires us to identify, advocate for and support work to improve our local sustainable environment in partnership with local councils, TfL, GLA and other organisations'*. To support these strategic goals, we are developing improvement schemes on our highways network in this area, towards which will be seeking s106 contributions from this development. The Council does not currently have all the funding for these strategic goals. They would only get delivered if contributions were secured, including from section 106 contributions.

Site location and access to public transport

21.13 The Site is bounded by Euston Road (A501) to the south, Hampstead Road (A400) to the east, Brock Street (pedestrians only) to the north, and Regent's Place (pedestrians only) to the west.

21.14 Tottenham Court Road (also A400) located approximately 50m south of the site, forms part of the Strategic Road Network (SRN). The Council is the highway authority for this road and is therefore responsible for its 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.

21.15 Euston Road and Hampstead Road form part of TfL's Transport for London Road Network (TLRN).

21.16 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent).

21.17 Warren Street, Euston Square and Great Portland Street (London Underground) stations are located approximately 160m south, 300m east and 340m west of the site, respectively. Euston Railway station is located approximately 550m to the east.

21.18 The closest bus stops are located on Hampstead Road next to the site and also on Euston Road outside Regent's Place.

21.19 The site is easily accessible from the Strategic Cycle Network, with Cycleway C27 located directly south of Euston Road in close proximity of the site.

21.20 The nearest Cycle Hire docking stations are located opposite the site on Hampstead Road and on Warren Street opposite Warren Street station. The Council is liaising with TfL to increase the provision of Cycle Hire docking station capacity to improve accessibility to the site from the north.

21.21 Dedicated parking bays for dockless rental e-bikes and rental e-scooters are located on Drummond Street and Osnaburgh Street. However, these bays are already showing signs of overcapacity and increasing demand.

21.22 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows grades of 2 and 5 in the vicinity of the site, which indicates significant opportunities for improvement, considering it is our aspiration (and target) for the STAL score to be 6b. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area, and it is hoped that additional bays could be provided in the future via developer contributions.

21.23 Immediately south of Euston Road, the proposed Fitzrovia Area Safe & Healthy Streets scheme will improve walking and cycling to the site.

21.24 Traffic and transportation issues were covered by reports forming part of the Environmental Statement.

Trip generation

21.25 The site has been vacant since 2021. The proposals will increase the existing floor area by 24,999 sqm (GIA) to provide 79,825 sqm (GIA) space for office, lab enabled space, café, and Enterprise Space.

21.26 The TRICS database was used to derive the total person trips the proposed new development has a potential to generate. The total morning and afternoon peak trip generation is presented in table 7.5 of the Transport Assessment Addendum and is reproduced here.

Table 7-15: Total Development Trips by Mode

Mode	AM Peak Hour (0800-0900)			PM Peak hour (1700-1800)		
	In	Out	Total	In	Out	Total
Pedestrians	121	10	131	8	113	121
Cyclists	175	15	190	11	163	174
Bus	188	16	204	12	175	187
Underground	710	59	769	44	661	705
Rail	576	48	624	36	536	572
Car drivers	0	0	0	0	0	0
Car passengers	0	0	0	0	0	0
Total	**1770**	**148**	**1918**	**111**	**1648**	**1759**

Figure 18 – Total development trips

21.27 The analysis shows that the proposal will result in a significant increase in person trips, the majority of which are projected to be taken by public transport and active travel. However, it is noted that the existing building is largely vacant and has been for a number of years.

21.28 Based on other developments in the area, it is anticipated that a high volume of the walking trips is likely to be made from Warren Street, Euston Square and Great Portland Street (London Underground) stations, the bus stops on Hampstead Road, Euston Road, and Tottenham Court Road, and also from rail stations at Euston, King's Cross, and St Pancras.

21.29 Considering the significant increase in active travel to and from the site, the applicant will be requested to provide financial contributions towards the aforementioned pedestrian and cycle links, and Regent's Park Area Safe and Healthy Streets schemes in the vicinity of the site.

21.30 As above, TfL have requested the applicant to provide financial contributions towards their Euston Circus improvements project (Euston Road junction with Hampstead Road) and capacity improvements to the nearby Santander cycle hire docking stations on Euston Road.

21.31 An Active Travel Zone (ATZ) assessment included in the TA identifies five routes to key destinations. The analysis shows some opportunities to enhance the pedestrian and cyclist environment on Euston Road and improve local conditions to increase active travel. Euston Road forms part of the TLRN which is managed by TfL. The Council would support TfL in securing financial contributions towards active travel improvements on Euston Road, Hampstead Road, and capacity improvements to the nearby Santander cycle hire docking stations. The contribution sought by TfL is to be confirmed.

Travel planning

21.32 An outline Travel Plan was submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. The targets for active travel will be updated following the results of the initial travel survey. Modal share projections for walking and cycling will need to be in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

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

Access and permeability

21.34 The west and north areas of the Euston Tower are pedestrianised, with Regent's Place Plaza, located to the west, consisting of a large pedestrianised square.

21.35 All pedestrian entrances will be provided at ground level. The office and laboratory entrances are located on Euston Road to the south side of the building. The community entrance to the enterprise space is accessed from the north and east of the site via Brock Street and Hampstead Road. The retail/restaurant uses will be located at Level 1 and accessed via Regents Place Plaza or Hampstead Road.

21.36 A dedicated cycle access, proposed to the south-west of the site, provides access to the basement via a cycle stair with wheel channels or lift.

21.37 The new public realm will provide active frontage, and pedestrian-prioritised and landscaped footways.

Public realm

21.38 Regent's Place Plaza, located to the west of Euston Tower, is a large pedestrianised square regularly used for exhibitions and events. The Plaza features large, planted seating platforms and low planting. At the intersection of Euston and Hampstead Roads, trees of various species and sizes are planted at grade with two formalized seating planters further north along Hampstead Road. Brock Street features a linear arrangement of plane trees planted in pits at grade, between which are a series of basement vents, wooden benches, and cycle stands.

21.39 The proposed development will provide active frontage, pedestrian-prioritised and landscaped footways, and new public realm. No stopping up of the public highway is required to implement the proposed development.

21.40 The landscaping proposals are designed to accommodate vehicle access to the development for the delivery of specialist gases associated with the proposed life science uses, and to allow cyclists to access to the entrance to the cycle store without compromising pedestrian flows along Euston Road (further detail is provided in the Cycle parking section).

21.41 In line with the Healthy Streets approach, the public realm improvements will include footways resurfacing with paving, new planting, seating, and secure cycle stands. The proposed footway widths range from 2.7m to 9.2m, which exceeds the guidance set out in Manual for Streets and TfL's Streetscape Guidance.

Cycle parking

21.42 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for the below. These standards are from before changes were made to the use classes order in 2020, so officers have selected the equivalent.

- A1 use (cafe)
    - first 1000 sqm 1 space per 175 sqm, thereafter 1 space per 1000 sqm (GEA) long stay,
    - first 750 sqm 1 space per 20 sqm, thereafter 1 space per 150 sqm (GEA) short stay.

- B1 use (business offices)
    - 1 space per 75 sqm (GEA) long stay,
    - first 5,000 sqm 1 space per 500 sqm, thereafter 1 space per 5,000 sqm (GEA) short stay.

- B1 use (lab enabled space)

- 1 space per 250 sqm (GEA) long stay,
- 1 space per 1000 sqm (GEA) short stay.

- D2 use (public - Enterprise Space)
  - 1 space per 8 FTE staff long stay,
  - 1 space per 100 sqm (GEA) short stay.

21.43 A dedicated entrance on Euston Road to the southwest of the proposed development will provide cycle access to the basement using a wide stair with wheel channels and an LCDS-compliant lift.

21.44 Cycle parking will be provided in line with the London Plan standards: 890 long stay and 100 short stay spaces. Long stay cycle parking is provided in the basement level, and consists of:

- 668 two-tier parking spaces (75%),
- 89 foldable bicycle parking spaces (10%),
- 89 spaces Sheffield stands (10%),
- 44 Enlarged Sheffield stands (5%).

21.45 Male and female changing rooms will also be provided, including 593 lockers and 74 showers.

21.46 The short-stay cycle parking spaces will be located within the public realm close to the building, with two enlarged spaces provided to the south of the cyclist arrival area.

21.47 The cycle parking details will be secured by condition.

Car parking and vehicle access

21.48 The site is located in controlled parking zone CA-G Somers Town Area, which operates 08:30-18:30 Monday to Friday, with variable controlled hours on Saturdays and none on Sundays. At present, additional controls on Saturday for Residents Bays and Paid for Bays apply 08:30-13:30 to streets west of Eversholt Street only.

21.49 The development is proposed car-free, which would be secured by legal agreement if planning consent were granted. The existing 102 car parking spaces will be removed. A condition is attached securing this.

21.50 Two blue-badge parking spaces are proposed within the Euston Tower basement, accessed from the Drummond Street car park ramp. This provision complies with the London Plan standards. It is requested that both parking bays are equipped with active electric vehicle charging points. A Car Parking Design Management Plan was submitted in support of the application.

21.51 Officers expect the large majority of visitors to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily

for local stakeholders. Officers therefore suggest that an additional electric vehicle charging point (fast charger installed on an island buildout) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.

CPZ Review

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

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

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

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

21.55 At present, the CA-G CPZ control hours do not extend into the evening, nor do they cover much of the weekend, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This has a potential to increase on-street parking pressure which may drive demand for CPZ reviews. Considering the location of the proposed development, it is appropriate to request a contribution of £30,000 towards the CA-G CPZ review, which is likely to take place in 2025-2028.

<u>Construction management</u>

21.56 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft Construction/Demolition Management Plan using the Council's CMP pro-forma is provided in support of the planning application. However, in absence of a

principal contractor, the document lacks some of the necessary detail and is therefore considered accordingly. The section 106 obligation on the CMP would require the applicant to liaise with HS2, to resolve any construction issues.

21.57 The site is located on the corner of Euston Road and Hampstead Road which form part of part of TfL's Transport for London Road Network (TLRN). Tottenham Court Road (A400) is located just to the south of the site, and forms part of the Strategic Road Network (SRN). Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

21.58 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network.

21.59 The contractor will be required 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.

21.60 More detailed DMP and CMP documents will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

21.61 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.

21.62 Implementation support contributions of £30,513 and impact bonds of £32,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.

21.63 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by legal agreement if planning permission is granted. Coordination of construction will be required with HS2, which would need to be covered on the final CMP.

<u>Deliveries and servicing</u>

21.64 A draft Delivery and Servicing Plan (DSP) was submitted with the application.

21.65 The existing servicing vehicle access from Longford Street to the servicing area in the basement will be retained, with Regent's Place Management continuing to manage all servicing arrangements. The basement servicing area will cater for office, life science and ancillary retail land uses.

21.66 The proposed development is projected to attract 96 daily servicing trips, with 15 vehicles in the peak hour. Servicing trips were calculated from delivery log data provided by the Regent's Place Management Team. It is confirmed that the Regent's Place Management data is comparable with the servicing trip generation obtained from TRICS.

21.67 The servicing area provides eight loading bays, shared between Euston Tower and Brock Street office building. There are two 10m loading bays, two 8m bays and four 6m bays. The loading bays are located at a lower level than the Euston Tower and Brock Street back-of-house accesses and platform lifts are used to transport goods and bins between the two levels. The swept paths analysis provided for a Rigid Vehicle and a 7.5t Panel Van accessing the 10m and 8m loading bays is considered acceptable. All vehicles will enter and exit the servicing area in a forward gear. The applicant is requested to equip four loading bays with EVCPs.

21.68 From the data received from Regents Place Management, Brock Street buildings receive 15-16 deliveries per day. Servicing trip capacity assessment, which takes account of peak time deliveries, vehicle dwell time and loading bays capacity, shows that five loading bays are required in the peak hour for both the Proposed Development and the other buildings on Brock Street. It is therefore considered that the proposed eight loading bays provide sufficient capacity to accommodate the servicing demand generated by the proposed development.

21.69 Once vehicles have accessed a loading bay, the driver will unload the goods, and the management team will take receipt of the delivery and transfer it to either the parcel/post room or to its intended destination in the building. Some deliveries may need to be received by their recipient directly, like laboratory samples; in these circumstances, the recipients will come to the loading bay to collect their delivery.

21.70 Two cargo bike parking bays will be also provided, with deliveries received by a member of on-site staff. It is welcomed to see that the DSP encourages the use of the cargo bikes. It is suggested that this is activity is monitored to provide further cycle parking should demand arise in the future.

21.71 The draft DSP expresses a desire for exploring the use of consolidation centres. It is requested that the applicant commits to freight consolidation, in order to reduce the level of deliveries by 50%. The applicant should also refer to the aforementioned FSAP which details further measures to achieve efficient, safe, and clean deliveries and servicing.

21.72 The DSP also outlines the proposed specialist delivery arrangements for Life Science, and the next section is an extract from the plan. The vehicle swept paths are provided and appear acceptable.

'Dependent upon the tenants, additional specialist bottled/liquid gas deliveries along with the regular deliveries will be required. The liquid and bottled gas deliveries cannot take place within the basement and need to be at ground level with blue-sky above them. At this stage it is therefore proposed that a certain

degree of flexibly is allowed to design for different volumes, types, and delivery methods of liquids/ gases.

All specialist delivery activity is proposed to be at ground-level to the northwest corner of the building. The proposed specialist delivery location will enable deliveries to be made safely and directly into the ground-level gas store. The vehicle will access the delivery bay from Drummond Street via Triton Square and stop in an area close to the gas store. An area will be cordoned off to pedestrians between the proposed planter to the north and the building. An alternative pedestrian route is provided to the north of the planter.

All vehicle movements across the Regent's Place Plaza and the delivery process will be fully managed by trained staff with a 'banksman' provided to guide the vehicles across and manoeuvre within the plaza. It is proposed that gas deliveries will be scheduled to be undertaken outside of peak pedestrian times where less people will be within the plaza.

Once the servicing vehicle has arrived, the delivery can be transferred into the building. For liquid nitrogen (LN2) deliveries, LN2 may be pumped directly to an on-site tank via a hose. If a Dewar exchange solution is adopted, full and empty Dewars will be transferred between the building and the LN2 store. Gas bottles will be brought directly into the store from the delivery vehicle using trollies and directly to the gas store at ground level.

Specialist life science gas deliveries are projected at one to three deliveries per week, with a maximum of one delivery per day.'

21.73 A more detailed DSP will be secured by s106 legal agreement if planning permission is granted. This will help to ensure that any operational impacts associated with delivery and servicing movements could be mitigated.

Highway works

21.74 The applicant would be financially responsible for any works relating to changes or repairs to the borough highway. Whilst it is expected that significant damage to the public highway is unlikely to be caused during demolition and construction, given the extent of the required works, it is suggested that a modest highways contribution of £30,000 be secured by legal agreement if planning permission is granted.

21.75 Transport for London is the Highway Authority for Euston Road and Hampstead Road, and may seek to enter into a S278 Agreement under the Highways Act 1980 to ensure any potential damage to the public highway during construction would be repaired at the developer's expense.

Pedestrian, cycling and environmental improvements

21.76 Securing financial planning obligations from major developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which requires mitigation. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes we are aspiring to deliver across the borough, as well as

complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on the Council's ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a potential source of funding where it is: necessary, directly related to the development and fairly and reasonable related in scale and kind.

21.77 The Council is developing proposals which will transform the public realm and make many streets more attractive to pedestrians and cyclists in The Regent's Park estate area immediately surrounding the Euston Tower. To tackle the significant deprivation of this area, we have developed a project called the Regent's Park Safe and Healthy Streets Scheme. An extensive stakeholder consultation in 2023 confirmed the most frequently raised issues around high traffic speeds, poor pedestrian crossings, traffic congestion and rat running, and inadequate pavement surface, width, and accessibility. The most frequent suggestions for changes focused on reduction in traffic volumes, new / safer crossings, and creating safer pedestrian routes, more seating, greenery, artwork and improved cleanliness, and more cycling infrastructure. We have now developed the Healthy Streets Projects and infrastructure improvements schemes on key hotspots, which will directly benefit the local community and the proposed development:

- Albany Street segregated cycle lanes.
- Robert Street – Compton Close public realm improvements.
- Prince of Wales Passage improvements.
- Drummond Street road safety improvements.

21.78 In line with the anticipated increase in cycle and walking trips generated by the development and further promoted by the Travel Plan, we will seek a financial contribution – to be confirmedtowards public realm improvement schemes to enhance the pedestrian and cycling environment in the vicinity of the site. This amount is to be confirmed. This will include:

- contributing towards the delivery of the wider Regent's Park Area Safe & Healthy Streets programme, with particular focus on road safety, pedestrian, cycling and public realm improvements on Drummond Street (west), Longford Street and Stanhope Street (south) in the immediate vicinity of the site,
- introducing a segregated cycle route in at least one direction, possibly two, along the length of Albany Street segregated cycle corridor (primary route), which form part of a borough wide 'Healthy Routes - strategic cycling corridors' programme of works,
- Fitzrovia Area Safe & Healthy Streets scheme.
- Highway improvement schemes developed to meet the strategic priorities of the Knowledge Quarter.

21.79 TfL have also requested the applicant to provide financial contributions (tbc) towards their Euston Circus improvements project (Euston Road junction with Hampstead Road) and capacity improvements to the nearby Santander cycle hire docking stations on Euston Road.

Micro and shared mobility improvements

21.80 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area.

21.81 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.

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

Conclusion

21.83 The proposal is acceptable in terms of transport implications subject to the following conditions and planning obligations being secured by legal agreement:

- Travel Plan and associated monitoring and measures contribution of £11,348.
- Car-free development.
- Car Park Management Plan
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- CA-G CPZ review contribution of £30,000.
- Construction Management Plan (CMP), CMP implementation support contribution of £30,513, and CMP Impact Bond of £32,000.
- Requirement to form a construction working group consisting of representatives from the local community.
- Delivery and Servicing Plan (including freight consolidation).
- Highway works contribution of £30,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £1,800,000.
- Micro and shared mobility improvements contribution of £10,000
- TfL PCE contribution tbc
- Cycle hire – land and/or £200k
- Section 278 agreement.

22 EMPLOYMENT AND TRAINING

22.1 The proposed development is a large use scheme providing significant new commercial space. The scheme has significant potential for job creation and could generate significant local economic benefits. Policies E1 and E2 seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services. CPG Employment Sites and Business Premises (2021) sets out that the Council will use S106 agreements to secure local employment and training initiatives and an element of affordable workspace from large scale employment schemes.

22.2 As was set out in the Land Use section, this scheme involves a significant increase in employment floorspace, and therefore a net increase in jobs.

22.3 There is an expectation that the scheme should deliver a range of training and employment benefits to provide opportunities during the construction and end use phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured via S106 legal agreement and will comprise:

- Construction apprenticeships and work placement opportunities through the King's Cross Construction Skills Centre;
- Local employment;
- Local Procurement; and
- Work apprenticeships.

22.4 An Employment & Skills Strategy and Regeneration Statement was submitted as part of this application. This sets out a draft framework for delivering the employment and skills opportunities required by policy. The applicant in this case will be responsible for construction, estate management and maintenance of the site which allows them to provide a long-term commitment to invest in employment, education and skills opportunities. Officers welcome the commitment in this document to delivering local employment outcomes in both the construction and end use phases of the development.

22.5 It is welcome that the developer has already had discussions with the Council's Inclusive Economy Team around opportunities for residents in both operational construction roles, together with design and management.

22.1 A strong package of employment and training obligations for both the construction and end use phase would be secured through a Section 106 legal agreement (see section on Planning obligations).

22.2 As the end use occupiers are not known at this stage, we will seek to ensure that the aim and obligations in respect of employment and skills are transferred to the end users as part of their subsequent lease arrangements.

22.3 A contribution of up to £600k would be secured to develop STEAM-related apprenticeships.

22.4

23 SAFETY AND SECURITY

23.1 Camden Local Plan policy C5 and CPG1 (Design) are relevant with regards to secure by design.

23.2 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 proposed design would incorporate natural surveillance and would not provide spaces that encourage/allow anti-social behaviour.

23.3 Active frontage is proposed on all four elevations of the building at ground floor level. Five entrances are proposed; four at ground floor level and one at first floor level. Two of the ground floor entrances would be on Euston Road, one on Hampstead Road and the last on Brock Street to the north. The first floor entrance would be on the west, from Regent's Place Plaza which would be accessed via the landscaped path. The proposed building would therefore provide natural surveillance. Lighting and CCTV are also proposed.

23.4 The Metropolitan Police have raised no objections to the proposals.

24 REFUSE AND RECYCLING

24.1 Policy CC5 and Camden Planning Guidance Design are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.

24.2 The existing servicing vehicle access from Longford Street to the servicing area in the basement would be retained, with Regent's Place Management continuing to manage all servicing arrangements. The basement servicing area will cater for office, life science and ancillary retail land uses. Servicing would take place on site. Waste and recycling would be stored at basement level. The proposed refuse and recycling areas are sufficient for the proposed quantum of waste.

24.3 A condition would ensure the refuse storage was ready for prior to occupation of the residential units.

25 PLANNING OBLIGATIONS

25.1 The following contributions are required to comply with planning policy and mitigate the impact of the development.

Obligation	**Amount (£)**
Affordable housing contribution	£27M
Car free	N/A
Car park management plan	N/A
CA-G CPZ review	30,000
Pedestrian, cycling and environmental contributions	Tbc
Knowledge Quarter occupier to occupy the lab-enabled space (excluding retail space)	N/A
Highways contribution	30,000
Delivery and Servicing Plan	N/A
Construction Management Plan (CMP) with liaison with HS2 (including over utilities)	N/A,
CMP implementation support	30,513
CMP bond	32,000
Construction Working Group (CWG)	N/A

Travel Plan	N/A
Travel Plan Monitoring and Measures Contribution	11,348
Micro and shared mobility improvements	10,000
Electric vehicle charging infrastructure	20,000
Euston Circus Healthy Streets (TfL)	383,984.64
Cycle Hire	200,000 or land to be provided on-site
Section 278 agreement	N/A
Energy and sustainability, to meet taregts and reasonable endeavours to improve upon them, also including materials passports	N/A
'Be Seen' energy monitoring	N/A
Carbon off-set fund	716,023
BREEAM targets	N/A
S106 For Future Proofing connection to Heat Networks	N/A
Affordable workspace – 465sqm of peppercorn rent for ten years	N/A
Apprenticeships	1,700 x 80 apprentices = 136,000
Employment and training contribution	611,709.91
Construction apprenticeships and work placement opportunities through the King's Cross Construction Skills Centre	N/A
Local employment and apprenticeships	N/A
To develop STEAM related apprenticeships	Up to 600,000
Basement Construction Plan	N/A
TOTAL	**29,011,578.55** **+ potential 200,00 for cycle hire** **+ up to 600,000 for STEAM** **+ Camden PCE**

26 MAYOR OF LONDON'S CROSSRAIL CIL

Mayor's CIL Totals	
Gross Charge	£5,479,705.05
Relief	£0.00
Net Charge	£5,479,705.05
ADD Surcharges	£0.00
ADD Late Payment Interest	£0.00
LESS Receipts	£0.00
Outstanding	£5,479,705.05

26.1 This calculation has had a decision date set as today and is based on the information provided (without any deductions.)

26.2 Prior to applying these to the calculation the applicant will need to provide completed forms for relief along with any supporting evidence.

26.3 The above is an estimate only and would be subject to the verification of the proposed floor area and calculations by the Council's CIL team.

26.4 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the addition of private residential units. 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.

27 CAMDEN CIL

27.1 The proposal would also be liable for the Camden Community Infrastructure Levy (CIL).

28 CONCLUSION

28.1 The application site is located within the Central Activities Zone, in an area where the Euston Area Plan expects significant development to come forward, and is just outside the Euston Opportunity Area. The site benefits from excellent transport connections.

28.2 The existing building is not considered of particular merit architecturally and is currently vacant (except for retail at ground floor). Reuse has been explored, but officers acknowledge that a light touch refurbishment is unlikely to make the building attractive as offices, particularly given floor-to-ceiling heights and the façade which needs replacing. The demolition/deconstruction of the building is therefore supported to bring forward strategic objectives, including growth in the KQ.

28.3 The proposed development would involve the substantial demolition/deconstruction of the existing tower and the construction of a new tower of the same height, but with an increased floorspace of +24,999. The proposals would bring forward this site in the heart of the Knowledge Quarter, delivering significant new employment space, affordable workspace, and an enterprise space, it will bring job opportunities for local people during construction and post construction.

28.4 Officers have negotiated a sum of £27M from the Euston Tower application towards the provision of affordable housing, which would be earmarked for the Tybald's Estate. Officers consider this a very good offer, which will help unlock the Tybald's development and provide much needed affordable housing in the south of the borough. The delivery of affordable housing in the south of the borough is often difficult to achieve, and the provision of these 28 affordable homes is strongly welcomed.

28.5 Paragraph 202 of the NPPF states that less than substantial harm to a designated heritage asset should be weighed against the public benefits of the proposals in reaching a decision. Paragraph 203 states that the impact on a non-

designated heritage asset should be taken into account in determining the application and requires a balanced judgement.

The harm to the heritage assets is less than substantial and the impact has been mitigated to a degree through design amendments to form, material and colour. However, that is given great weight in the decision making process.In almost all instances the impact is considered to be neutral when compared to the extant condition. However, in the matter of the setting of the Regent's Park Conservation Area, Registered Park and Garden, and all its attendant listed buildings the harm caused to setting by the proposed development is slightly greater than the extant condition. This is due to the increased "thickness" of the silhouette which is perceptible in the long view over the Nash terraces, the detailing of the upper storeys in contrast to the body of the Tower (compared to the lower degree of contrast between crown and body on the extant façade) and the decrease of reflectivity by the superimposition of a masonry grid structure.

28.6 The proposed building is considered high-quality in terms of the form of the tower, its crown and the podium at the base. The articulation of the tower and podium facades and the proposed materials and colours would result in a building of architectural quality.

28.7 The proposed building would not be the best performing building in sustainability terms, but it is as good as if not better than buildings of a similar typology and we accept that it is very difficult for a building of this form, including lab-enabled space to achieve more highly.

28.8 Aside from the points above, the demolition/deconstruction of the building allows for the most efficient use of the land and will allow for delivery on other significant development plan policies. Officers are satisfied that the principle of demolition of the buildings in sustainability terms does not result in a conflict with the development plan.

28.9 There would be an impact in terms of loss of daylight to properties at 40-60 Hampstead Road, however, taking account of the BRE guidelines, the need to apply flexibly and take into account the existing situation with, officers do not feel that any losses would justify refusal.

28.10 The proposed development would deliver substantial economic, environmental and social benefits which would deliver on many of the objectives of the Local Plan and London Plan.

- New employment space in a highly accessible Central London location, within the Knowledge Quarter, adjacent to an area designated for growth. An employment and training package including apprenticeships and the provision of affordable workspace would provide new job opportunities for local people and businesses.
- A payment of £27M towards providing affordable homes at the Tybald's Estate, substantially helping to deliver the whole of the Tybald's project.
- The removal of a vacant building of low architectural quality and the provision of high quality architecture in its place.

- Public real and landscaping improvements in the area, particularly at regent's Plaza.

28.11 As well as the public benefits the scheme has been designed to minimise the impact of the scheme on neighbouring properties in terms of loss of light, outlook and privacy.

28.12 In conclusion, the scheme will deliver new homes and jobs as well as a safer, more attractive and more inclusive public realm. The architectural design of the new buildings is high-quality. The proposals would assist in delivering the objectives of growth in the Euston Growth Area, the Knowledge Quarter and contribute to the Council's wider vision and objectives for this part of the borough, including a including affordable housing, significant provision of offices and other employment facilities and an excellent public realm. Taking account of the policies of development plan and all the material planning considerations the proposals would deliver significant social, environmental and economic benefits that outweigh the less than substantial harm to heritage assets and it is therefore recommended that planning permission be granted.

29 RECOMMENDATIONS

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

30 LEGAL COMMENTS

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

31 CONDITIONS

1	Three years from the date of this permission This development must be begun not later than three years from the date of this permission. Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).
2	Approved drawings (1) The development hereby permitted shall be carried out in accordance with the following approved plans: Site Plans ET-DR-A-1002 - Site Location Plan - P2 ET-DR-A-1003 - Site Location Plan - Split By Level - P2 ET-DR-A-0000 - Site Plan - Existing - P2 ET-DR-A-1001 - Site Plan - Proposed - P2 Site Elevations ET-DR-A-0010 - South Site Elevation - Existing - P1 ET-DR-A-0011 - East Site Elevation - Existing - P1 ET-DR-A-1010 - South Site Elevation - Proposed - P3 ET-DR-A-1011 - East Site Elevation - Proposed - P3 CIL Phasing Plans ET-DR-A-1049 - CIL Phasing Plan Phase 0 - Substation Works - P1 ET-DR-A-1050 - CIL Phasing Plan Phase 1 - Deconstruction - P2 ET-DR-A-1051 - CIL Phasing Plan Phase 2 - Construction - P2 Floor Plans - Existing ET-DR-A-00099 - Level Basement 01 Plan - Existing - P2 ET-DR-A-00100 - Level 00 Floor Plan - Existing - P2 ET-DR-A-00101 - Level 01 Floor Plan - Existing - P1 ET-DR-A-00102 - Level 02 Floor Plan - Existing - P1 ET-DR-A-00103 - Level 03 Floor Plan - Existing - P1 ET-DR-A-00104 - Level 04 Floor Plan - Existing - P1 ET-DR-A-00105 - Level 05 Floor Plan - Existing - P1 ET-DR-A-00106 - Level 06 Floor Plan - Existing - P1 ET-DR-A-00107 - Level 07 Floor Plan - Existing - P1 ET-DR-A-00108 - Level 08 Floor Plan - Existing - P1 ET-DR-A-00109 - Level 09 Floor Plan - Existing - P1 ET-DR-A-00110 - Level 10 Floor Plan - Existing - P1 ET-DR-A-00111 - Level 11 Floor Plan - Existing - P1 ET-DR-A-00112 - Level 12 Floor Plan - Existing - P1 ET-DR-A-00113 - Level 13 Floor Plan - Existing - P1 ET-DR-A-00114 - Level 14 Floor Plan - Existing - P1 ET-DR-A-00115 - Level 15 Floor Plan - Existing - P1

	ET-DR-A-00116 - Level 16 Floor Plan - Existing - P1 ET-DR-A-00117 - Level 17 Floor Plan - Existing - P1 ET-DR-A-00118 - Level 18 Floor Plan - Existing - P1 ET-DR-A-00119 - Level 19 Floor Plan - Existing - P1 ET-DR-A-00120 - Level 20 Floor Plan - Existing - P1 ET-DR-A-00121 - Level 21 Floor Plan - Existing - P1 ET-DR-A-00122 - Level 22 Floor Plan - Existing - P1 ET-DR-A-00123 - Level 23 Floor Plan - Existing - P1 ET-DR-A-00124 - Level 24 Floor Plan - Existing - P1 ET-DR-A-00125 - Level 25 Floor Plan - Existing - P1 ET-DR-A-00126 - Level 26 Floor Plan - Existing - P1 ET-DR-A-00127 - Level 27 Floor Plan - Existing - P1 ET-DR-A-00128 - Level 28 Floor Plan - Existing - P1 ET-DR-A-00129 - Level 29 Floor Plan - Existing - P1 ET-DR-A-00130 - Level 30 Floor Plan - Existing - P1 ET-DR-A-00131 - Level 31 Floor Plan - Existing - P1 ET-DR-A-00132 - Level 32 Floor Plan - Existing - P1 ET-DR-A-00133 - Level 33 Floor Plan - Existing - P1 ET-DR-A-00134 - Level 34 Floor Plan - Existing - P1 ET-DR-A-00135 - Level 35 Floor Plan - Existing - P1 ET-DR-A-00136 - Level 36 Floor Plan - Existing - P1 ET-DR-A-00137 - Roof Plan - Existing - P1 Elevations - Existing ET-DR-A-00200 - North Elevation - Existing - P1 ET-DR-A-00201 - South Elevation - Existing - P1 ET-DR-A-00202 - East Elevation - Existing - P1 ET-DR-A-00203 - West Elevation - Existing - P1 ET-DR-A-00300 - North Elevation Illustrative - Existing - P1 ET-DR-A-00301 - South Elevation Illustrative - Existing - P1 ET-DR-A-00302 - East Elevation Illustrative - Existing - P1 ET-DR-A-00303 - West Elevation Illustrative - Existing - P1 Sections - Existing ET-DR-A-00310 - Section A-A - Existing - P1 ET-DR-A-00311 - Section B-B - Existing - P1 Reason: For the avoidance of doubt and in the interest of proper planning.
2	Approved drawings (2) The development hereby permitted shall be carried out in accordance with the following approved plans: Floor Plans - Proposed ET-DR-A-20098 - Level Basement 02 Plan - Proposed - P2 ET-DR-A-20099 - Level Basement 01 Plan - Proposed - P2 ET-DR-A-20100 - Level 00 Floor Plan - Proposed - P3 ET-DR-A-20101 - Level 01 Floor Plan - Proposed - P3 ET-DR-A-20102 - Level 02 Floor Plan - Proposed - P3

	ET-DR-A-20103 - Level 03 Floor Plan - Proposed - P3 ET-DR-A-20104 - Level 04 Floor Plan - Proposed - P3 ET-DR-A-20105 - Level 05 Floor Plan - Proposed - P3 ET-DR-A-20106 - Level 06 Floor Plan - Proposed - P3 ET-DR-A-20107 - Level 07 Floor Plan - Proposed - P2 ET-DR-A-20108 - Level 08 Floor Plan - Proposed - P2 ET-DR-A-20109 - Level 09 Floor Plan - Proposed - P2 ET-DR-A-20110 - Level 10 Floor Plan - Proposed - P2 ET-DR-A-20111 - Level 11 Floor Plan - Proposed - P2 ET-DR-A-20112 - Level 12 Floor Plan - Proposed - P2 ET-DR-A-20113 - Level 13 Floor Plan - Proposed - P2 ET-DR-A-20114 - Level 14 Floor Plan - Proposed - P2 ET-DR-A-20115 - Level 15 Floor Plan - Proposed - P2 ET-DR-A-20116 - Level 16 Floor Plan - Proposed - P2 ET-DR-A-20117 - Level 17 Floor Plan - Proposed - P2 ET-DR-A-20118 - Level 18 Floor Plan - Proposed - P2 ET-DR-A-20119 - Level 19 Floor Plan - Proposed - P2 ET-DR-A-20120 - Level 20 Floor Plan - Proposed - P2 ET-DR-A-20121 - Level 21 Floor Plan - Proposed - P2 ET-DR-A-20122 - Level 22 Floor Plan - Proposed - P2 ET-DR-A-20123 - Level 23 Floor Plan - Proposed - P2 ET-DR-A-20124 - Level 24 Floor Plan - Proposed - P2 ET-DR-A-20125 - Level 25 Floor Plan - Proposed - P2 ET-DR-A-20126 - Level 26 Floor Plan - Proposed - P2 ET-DR-A-20127 - Level 27 Floor Plan - Proposed - P2 ET-DR-A-20128 - Level 28 Floor Plan - Proposed - P2 ET-DR-A-20129 - Level 29 Floor Plan - Proposed - P2 ET-DR-A-20130 - Level 30 Floor Plan - Proposed - P2 ET-DR-A-20131 - Level 31 Floor Plan - Proposed - P2 ET-DR-A-20132 - Roof Plan - Proposed - P2 Elevations - Proposed ET-DR-A-30010 - South Elevation - Proposed - P3 ET-DR-A-30011 - North Elevation - Proposed - P3 ET-DR-A-30012 - East Elevation - Proposed - P3 ET-DR-A-30013 - West Elevation - Proposed - P3 ET-DR-A-30020 - South Elevation Proposed - Illustrative - P3 ET-DR-A-30021 - North Elevation Proposed - Illustrative - P3 ET-DR-A-30022 - East Elevation Proposed - Illustrative - P3 ET-DR-A-30023 - West Elevation Proposed - Illustrative - P3 Sections - Proposed ET-DR-A-30001 - Section A-A - Proposed - P2 ET-DR-A-30002 - Section B-B - Proposed - P2 ET-DR-A-30003 - Section C-C - Proposed - P2 ET-DR-A-30004 - Section D-D - Proposed - P2 Technical Drawings ET-DR-A-5000 - Bay Study Typical Illustrative - Proposed - P3 ET-DR-A-5001 - Bay Study Amenity Illustrative - Proposed - P3 ET-DR-A-5002 - Bay Study Podium Illustrative - Proposed - P1

	Landscaping Plans 364_20.000 R1 PROPOSED PUBLIC REALM - Illustrative 364_20.001 R1 PROPOSED PUBLIC REALM - General Arrangement - Level 00-01 364_20.002 R1 PROPOSED PUBLIC REALM - Boundaries and Edges - Level 00-01 364_20.003 R1 PROPOSED PUBLIC REALM - Levels and Drainage Intent - Level 00-01 364_20.004 R1 PROPOSED PUBLIC REALM - Planting Plan - Level 00-01 364_20.005 R1 PROPOSED PUBLIC REALM - Tree Plan - Level 00-01 364_20.006 R1 PROPOSED PUBLIC REALM - General Arrangement - Level 02 364_20.007 R1 PROPOSED PUBLIC REALM - Planting Plan - Level 02 364_90.001 R1 PROPOSED PUBLIC REALM - Open Space Provision - Level 00-01 364_90.002 R1 PROPOSED PUBLIC REALM - Open Space Provision - Level 02 Reason: For the avoidance of doubt and in the interest of proper planning.
3	Approved drawings (3) The development hereby permitted shall be carried out in accordance with the following approved plans: Reports: 1. Covering Letter dated December 2024 2. CIL Form dated December 2024 3. Town Planning Statement December 2023 and Town Planning Statement Addendum December 2024 4. Accessibility Statement December 2023 and Accessibility Statement Addendum December 2024 5. Acoustic Report December 2023 and Acoustic Report Addendum December 2024 6. Archaeological Desk-Based Assessment December 2023 and Archaeological Desk-Based Assessment December 2024 7. Revised Basement Impact Assessment P07 December 2024 8. Revised Biodiversity Survey and Report December 2024 9. Urban Greening Factor Assessment December 2024 10. Circular Economy Statement Revision C December 2024 11. Crime Impact Assessment Revision H December 2024 12. Design and Access Statement Revision B December 2024 and Design Addendum March 2025 13. Employment and Skills Strategy and Regeneration Statement December 2023 and Employment and Skills Strategy and Regeneration Statement December 2024 14. Energy Statement Revision P05 15. Daylight and Sunlight Assessment December 2023 and Daylight and Sunlight Assessment Addendum December 2024

	16. Demolition Feasibility Appraisal Volume 0 Revision B December 2024, Volume 1 Revision D December 2023, Volume 2 Revision B December 2023, and Volume 3 Revision B December 2024 17. Drainage and SuDS Strategy December 2023 and Drainage and SuDS Strategy Addendum December 2024 18. Fire Statement December 2023 and Fire Statement Addendum December 2024 19. Flood Risk Assessment December 2023 and Flood Risk Assessment Addendum December 2024 20. Health Impact Assessment December 2023 and Health Impact Assessment Addendum December 2024 21. Landscaping Scheme December 2023 and Landscaping Scheme Addendum December 2024 22. Lighting Assessment Addendum December 2024 23. Enterprise Space Framework December 2024 24. Sustainability Statement Revision C December 2024 25. Statement of Community Involvement December 2023 and Statement of Community Involvement Addendum December 2024 26. Telecommunications Report December 2023 and Telecommunications Report Addendum December 2024 27. Transport Assessment December 2023 and Transport Assessment Addendum December 2024 including: a. Draft Construction Management Plan December 2024 b. Delivery Servicing Management Plan December 2023 and Delivery Servicing Management Plan Addendum December 2024 c. Car Parking Design and Management Plan December 2023 and Car Parking Design and Management Plan Addendum December 2024 d. Operational Waste Management Strategy December 2023 and Operational Waste Management Strategy Addendum December 2024 e. Site Waste Management Plan December 2023 and Site Waste Management Plan Addendum December 2024 f. Outline Travel Plan December 2023 and Outline Travel Plan Addendum December 2024 g. Outline Construction Logistics Plan Version 1.0 December 2024 h. Arboricultural Assessment December 2024 i. Ventilation Strategy December 2023 and Ventilation Strategy Addendum December 2024 j. Whole Life Carbon Assessment Revision C December 2024 k. Environmental Statement December 2023 and Environmental Statement Addendum December 2024 Reason: For the avoidance of doubt and in the interest of proper planning.
4	Details – façade junctions Prior to the relevant parts of the works commencing, details, including plans, coloured elevations and sections at 1:10 of all typical façade junctions including at ground level, window / external door reveal, cill and head, soffit and at junction with roof (such details to include any ventilation grills, screening, balustrades, parapets, gates, planters and associated elements

	and lighting fixtures) shall be submitted to the Local Planning Authority and approved in writing. 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.
5	Details – facing materials Prior to the relevant parts of the works commencing, manufacturer's specification details of all facing materials and samples of those materials (to be provided on site) shall be submitted to the local planning authority and approved in writing. All samples of materials shall be provided at a suitable size (eg. 1x1m) and alongside all neighbouring materials and retained on sie throughout the duration of the works. 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.
6	Details – sample panels of tower facade Prior to the relevant part of the works commencing, sample panel(s) of the typical tower façade bay at 1:1 scale including a full glazed opening (with proposed glass specification, both reveals, cill and header detail) shall be installed on site (or alternative pre-arranged location if necessitated by construction methodology) for the local planning authority to review. The work shall subsequently not proceed other than in accordance with the approved details. 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.
7	Details – sample of podium façade Prior to the relevant part of the works commencing, sample panel(s) of typical podium façade bay at 1:1 scale including a full glazed opening (with proposed glass specification, both reveals, cill and header detail), shall be installed on site (or alternative pre-arranged location if necessitated by construction methodology) for the local planning authority to review. The work shall subsequently not proceed other than in accordance with the approved details. 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.
8	Details of podium corner Prior to the relevant part of the works commencing, detailed drawings of the south-east corner of the podium shall be submitted to and approved by the

	local planning authority in writing. The proposals shall be constructed in accordance with these approved details. 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.
9	Glazing specification Prior to the relevant parts of the works commencing, details of the glazing specification for the building facades shall be submitted to and approved by the local planning authority in writing. The details shall demonstrate that the shading achieves a glass that has a relatively high 'G-value', meaning that it will appear clear. The work shall subsequently not proceed other than in accordance with the approved details. 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.
10	External fixtures 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. 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.
11	Refuse and recycling Prior to first occupation, the refuse and recycling storage areas as shown on the approved drawings shall be completed and shall be retained thereafter. Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of Camden Local Plan policy CC5.
12	Non-road mobile machinery No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register). Reason: To 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.
13	Plant noise The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS 4142:2014 "Methods for rating and assessing industrial and commercial sound" at the nearest and/or most affected noise sensitive premises, with installation operating at maximum capacity and thereafter be permanently retained. Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.
14	Anti-vibration Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such. Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.
15	Cycle parking Prior to first occupation, 50% of the following bicycle parking shall be provided, with the remaining 50% provided once the office space is 50% occupied in • 668 two-tier parking spaces (75%), • 89 foldable bicycle parking spaces (10%), • 89 spaces Sheffield stands (10%), • 44 Enlarged Sheffield stands (5%). All such facilities shall thereafter be permanently maintained and retained. Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Camden Local Plan policies T1 and T2, the London Plan and CPG Transport.
16	Landscaping Full details of landscaping, including native species and species (120 trees) identified within the Royal Horticultural Society's plants for pollinators lists,

	shall be submitted to and approved in writing by the Local Planning Authority, prior to commencement relevant part of the development of work (save for deconstruction) The landscaping details thus approved shall thereafter be carried out in full prior to first occupation of the buildings. Details shall include plans, coloured elevations and sections at 1:20 of all typical landscape junctions. Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, A5 D1 and D2 of the London Borough of Camden Local Plan 2017.
17	Landscaping - replacement planting All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or occupation of the development whichever is sooner. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation. Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.
18	Tree Protection Strategy Prior to the commencement of the relevant part of construction/demolition/deconstruction works on site, full details of protection measures for trees to be retained around the site shall be submitted to and approved in writing by the Local Planning Authority. The works shall commence in accordance with approved details and the protection shall then remain in place for the duration of works on site, unless otherwise agreed in writing by the local planning authority. 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.
19	SuDS: Further details Prior to commencement of work (save for demolition/deconstruction), full details of the sustainable drainage system including 158.1m3 of attenuation tanks and 117.1m3 of blue roof storage and additional green roofs, shall be submitted to and approved in writing by the local planning authority. Such a system should be designed 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 or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to the greenfield run-off rate or other rate of 10 l/s approved by the Local Planning Authority. An up to date drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including: • The proposed SuDS or drainage measures including storage capacities • The proposed surface water discharge rates or volumes The approved systems shall be implemented prior to occupation of the development and thereafter retained and maintained in accordance with the approved details. Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.
20	SuDS: Evidence of installation Prior to occupation, evidence that the system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan. Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.
21	Piling No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with policies A1 and T3 of the London Borough of Camden Local Plan 2017 and policy T4 of the London Plan 2021..
22	LUL – infrastructure

	Prior to deconstruction/demolition, to submit no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved for approval in writing by the local planning authority in consultation with TfL Infrastructure Protection. the following shall be submitted to and approved in writing by the local planning authority (in consultation with TfL Infrastructure Protection). in consultation with TfL Infrastructure a) an overview of how the overall development including both design on temporary and permanent works; b) provide deconstruction/demolition details; c) accommodate the location of the existing London Underground structures and roads; d) accommodate ground movement arising from the development construction thereof; e) mitigate the effects of noise and vibration arising from the adjoining railway operations and roads; f) provide details on the use of tall plant/scaffolding for the demolition phase; g) seek to ensure that no claims are made against TfL or London Underground by the Local Authority, purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway. The development shall thereafter be carried out in accordance with the details thus approved. Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with policies A1 and T3 of the London Borough of Camden Local Plan 2017 and policy T4 of the London Plan 2021.
23	LUL – substructure a) Prior to the sub-structure construction stage begins to submit for approval Before, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority in consultation with TfL Infrastructure Protection.provide detailed design for foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent); b) site specific Risk Assessments and Method Statements (RAMS) for any activities (basement excavation, groundworks, piling) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing. Reason: To ensure that the development does not impact on existing London

	Underground transport infrastructure, in accordance with policies A1 and T3 of the London Borough of Camden Local Plan 2017 and policy T4 of the London Plan 2021..
24	LUL – superstructure Prior to the construction phase begins, to submit for approval Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure a) Protection, have been submitted to and approved in writing by the local planning authority in consultation with TfL Infrastructure Protection.provide detailed design for all superstructure works (temporary and permanent); b) site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing. The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and structural elements within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied. Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with policies A1 and T3 of the London Borough of Camden Local Plan 2017 and policy T4 of the London Plan 2021.
25	Crossrail 2 None of the development hereby permitted shall be commenced No piling works shall be carried out until detailed design and construction method statements for all the ground floor structures, foundations and basements and for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Local Planning Authority such method statements to demonstrate how the Development will: which: (i) Accommodate the proposed location of the Crossrail 2 structures including tunnels, shafts and temporary works, (ii) Accommodate ground movement arising from the construction thereof, (iii) Mitigate the effects of noise and vibration arising from the operation of the Crossrail 2 railway within the tunnels and other structures, The development shall be carried out in all respects in accordance with the approved design and method statements.

	All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i), (ii) and (iii) of this condition shall be completed, in their entirety, before any part of the buildingis occupied. Reason: To ensure that the development does not impact on Crossrail transport infrastructure, in accordance with policies A1 and T3 of the London Borough of Camden Local Plan 2017 and policy T4 of the London Plan 2021.
26	Maximising Solar PV Prior to the construction phase of the development, a feasibility assessment with the aim of maximising the provision of solar photovoltaics should be submitted to the local planning authority and approved in writing. The proposals should include as a minimum the approved no.63 panels with energy generation capacity at least 23.31kWp. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter. Reason: To ensure the development provides adequate on-site renewable energy facilities 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 Policies.
27	Fire Statement The development shall be constructed in accordance with, and at all times occupied and managed in strict compliance with, the approved Fire Statement by Arup dated December 2023 and Addendum Fire Statement dated December 2024. Reason: To ensure the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.
28	Urban Greening Factor (UGF) The development shall achieve a UGF Score of 0.3, prior to occupation and shall be retained as such in perpetuity. Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity, character and biodiversity of the area in accordance with the requirements of policies A2, A3 and D1 of Local Plan 2017 and policy G5 of the London Plan 2021.
29	Laboratory Flues Prior to commencement of superstructure, details of the proposed Laboratory Flues, any associated abatement technologies, potential emission details and dispersion modelling shall have been submitted to and approved by the Local Planning Authority in writing. The flue should be located away from air inlet locations. The maintenance and cleaning of the systems shall be undertaken

	regularly in accordance with manufacturer specifications. The development shall be carried out in accordance with the details thus approved and the retained and maintained thereafter. 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 Policies.
30	Diesel or oil back up generators No emergency Diesel/Oil/HVO Generator Plant shall be installed, until details of such plant and any associated abatement technologies including make, model and emission details have been submitted to and approved by the Local Planning Authority in writing. Generators must be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. The flue/exhaust from the generator must be located away from air inlet locations. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be provided prior to first use following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State. Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.
31	Whole Life-Cycle Carbon Assessment An updated version of the Whole Life Carbon Assessment hereby approved shall be submitted to and approved in writing by the Council at each of the following stages of development: (a) Prior to demolition/deconstruction of any work on site. (b) Prior to commencement of any construction works. (c) Within 3 months of first occupation of the development. Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 703kgCO2e/m2 and/or Whole Life Carbon (A-C) ex B6 & B7 inc sequestration above 1225kgCO2e/m2, which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised. You must not commence any work on site and/or construction works (as appropriate pursuant parts (a) and (b) above) until we have approved the updated assessment you have sent us. You must then carry out works, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved.

	The post construction assessment submitted for our approval pursuant to (c) shall demonstrate how the development has been completed in accordance with the updated benchmarks identified in the updated assessment submitted pursuant to part (b). Reason: To ensure the development minimises its effects on climate change as far as possible in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan and Policy SI 7 of the London Plan 2021.
32	Removal of car parking Prior to the occupation of the approved building, the 102 car parking spaces will have been removed. No car parking except that approved for people with disabilities shall be provided on site. Reason: To ensure that the scheme is sustainable and car-free in accordance with Camden Local Plan policies T1 and T2, the London Plan and CPG Transport.
33	Construction and Demolition Waste The Circular Economy Statement as approved (include reference to documents) shall be delivered to achieve at least 98% of the demolition waste to be diverted from landfill, 96% of the construction waste to be diverted from landfill and 95% of excavation waste to be put to beneficial use. ~~95% reuse/recycling/recovery of construction and demolition waste and 95% beneficial use of excavation waste.~~ Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.
34	Pre-Demolition Audit A review of the pre-demolition audit should be undertaken prior to demolition/deconstruction commencement and submitted for review to and approved by the Local Planning Authority in writing. The pre-demolition audit should document material recovery with proportions of material and reuse/recycling potential (including a schedule of practical and realistic providers who can act as brokers for each of the reclaimed items), targeting reuse/recycling at the higher end of the waste hierarchy or providing an explanation where material reuse/recycling lower in the waste hierarchy cannot be avoided Where material reuse lower in the waste hierarchy cannot be avoided this must be demonstrated to the Council's satisfaction. Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.
35	Post-construction Circular Economy monitoring report

	Prior to the occupation of the development a post-construction monitoring report and spreadsheet should be completed in line with the GLA's Circular Economy Statement Guidance. The Circular Economy Statement should include a Pioneering Bill of Materials which includes reused and recycled content by volume and mass. For reused and recycled content calculations shall be submitted as accompanying supporting evidence. The post-construction monitoring report shall be submitted to the GLA, currently via email at: circulareconomystatements@london.gov.uk ,along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the development. Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.
36	Whole Life Carbon – post construction assessment Prior to the occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to ZeroCarbonPlanning@london.gov.uk and SustainabilityPlanning@camden.gov.uk, along with any supporting evidence as per the guidance. Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Camden Local Plan policies CC1, CC2, CC3, and CC4, and London Plan policies, SI1, SI2, SI3, SI4, SI5 and SI7.
37	Air Quality – Dust Risk Assessment Prior to demolition/deconstruction, an updated dust risk assessment report, written in accordance with the relevant current guidance, for the proposed development shall be submitted to and approved in writing by the Local Planning Authority. If required, mitigation measures based on the findings of the report shall be submitted to and approved in writing by the Local Planning Authority prior to commencement. The approved mitigation scheme shall be implemented in accordance with the approved details. Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan policies A1 and CC4 and London Plan policy SI 1.

48	Air quality monitoring during construction No development including any demolition, shall take place until 1. full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance; 2. a confirmation email shall be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details. 3. a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed commencement of demolition shall be submitted to the Local Planning Authority and approved in writing. The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, unless otherwise agreed with the LPA monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing. Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017 and London Plan policy SI 1.
49	Green roofs Prior to commencement of development, full details in respect of the living roofs in the areas indicated on the approved roof plan shall be submitted to and approved by the local planning authority. The details shall include i. a detailed scheme of maintenance ii. sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used and for larger areas showing variations of substrate depth iii. full details of planting species and density The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme. Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1 and A3 of the London Borough of Camden Local Plan 2017.

50	Air source heat pumps Prior to commencement of relevant works, details, drawings and data sheets showing the location 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 active cooling should not be activated unless the internal temperature exceeds 22 degrees Celsius. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter. Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local plan Policies.
51	Mechanical ventilation Prior to occupation full details of the mechanical ventilation system including the following shall be submitted to and approved in writing by the local planning authority: a) air inlet locations (air inlet locations should be located away from busy roads and any other emission sources and as close to roof level as possible, to protect internal air quality). b) appropriate NO2 and Particulate filtration system on the mechanical ventilation intake has been installed and a detailed mechanism to secure maintenance of this system. The development shall thereafter be constructed and maintained in accordance with the approved details. Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.
52	NABERS Prior to commencement of development (save for deconstruction/demolition) the applicant must register the project for NABERS UK Design for Performance. Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.

53	Natural ventilation Prior to commencement of development (save for deconstruction/demolition) details of a review of options natural ventilation shall be submitted to and approved by the Council. Should the Council consider that natural ventilation can be achieved in line with the details, the proposals must be built out in accordance with these details and retained in line with them in perpetuity. Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.

32 INFORMATIVES

1	Waste comments (Thames Water) Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes. The proposed development is located within 15m of our underground waste water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices

	Thames Water would advise that with regard to waste water network and waste water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
2	Water Comments (Thames Water) Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
3	London Underground The applicant is advised to contact London Underground Infrastructure Protection in advance of assessment of impact to London Underground assets, submission of method statement of the demolition and preparation of final design and associated method statements, in particular with regard to: demolition; excavation and construction methods.
4	HS2 The applicant is advised that the application site lies within close proximity of land that may be required to construct and/or operate Phase One of a high-speed rail line between London and the West Midlands, known as High Speed Two. Powers to construct and operate High Speed Two were secured on 23 February 2017 when Royal Assent was granted for Phase One of HS2. As a result the applicant is advised to follow ongoing progress of the HS2 programme, further information can be found at: https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fcollections%2Fhigh-speed-rail-london-west-midlands-bill&data=05%7C02%7CDavid.Fowler%40camden.gov.uk%7C827bfa66c2cd4b6091ed08dccdbced43%7C5e8f4a342bdb4854bb42b4d0c7d0246c%7C0%7C0%7C638611458555266824%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=3X20dG2LydCyQE7a3c1TlbILIj7a4XUV5sxU9K%2BPypQ%3D&reserved=0.
5	Non-road mobile machinery 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/”.
6	Cadent Gas Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights

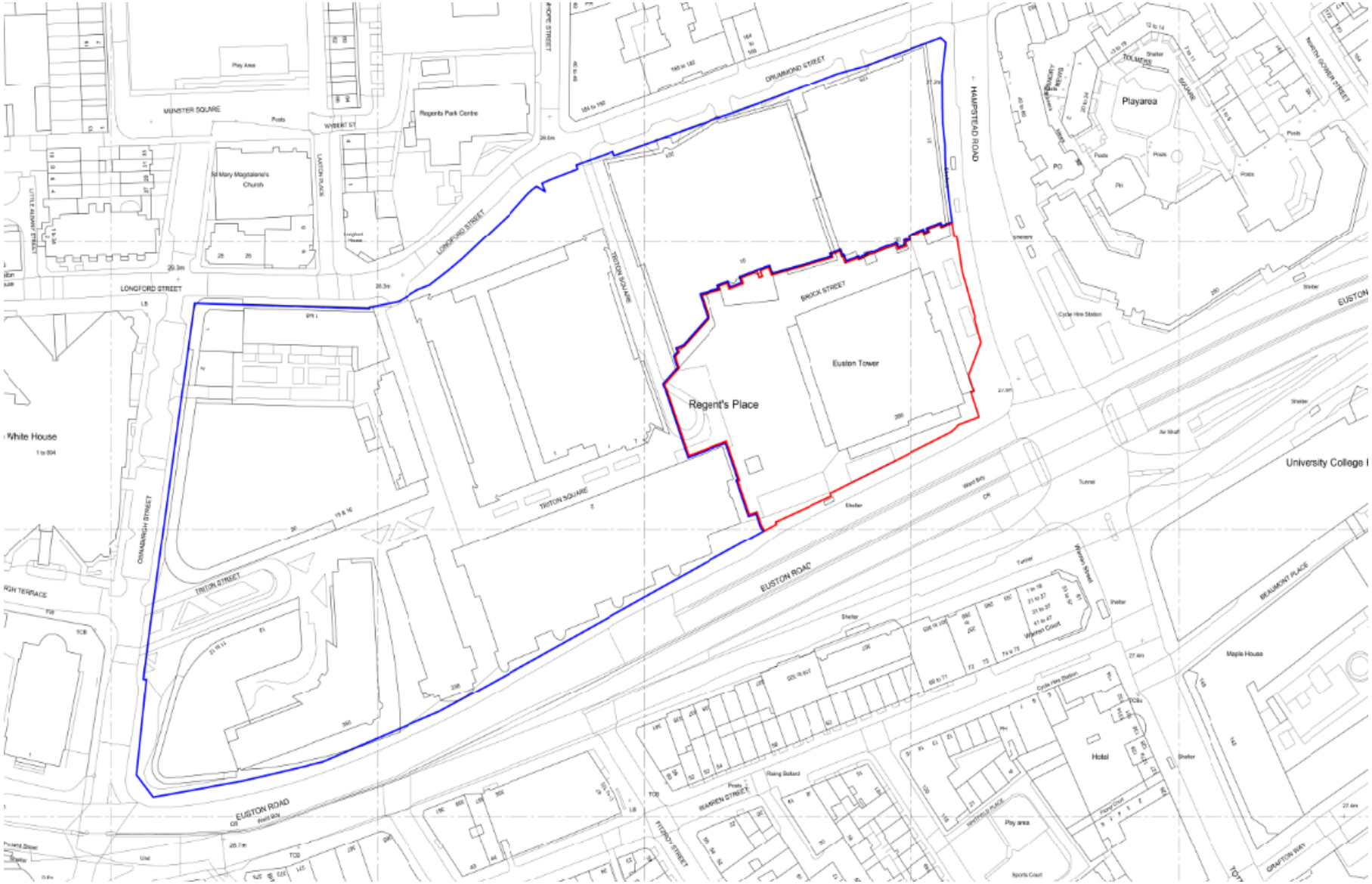
	of access and or restrictive covenants that exist. If buildings or structures are proposed directly above the apparatus the development may only take place following diversion of the apparatus. The applicant should apply online to have apparatus diverted in advance of any works, by visiting cadentgas.com/diversions. Prior to carrying out works, including the construction of access points, please register on www.linesearchbeforeudig.co.uk to submit details of the planned works for review, ensuring requirements are adhered to.

Planning Committee

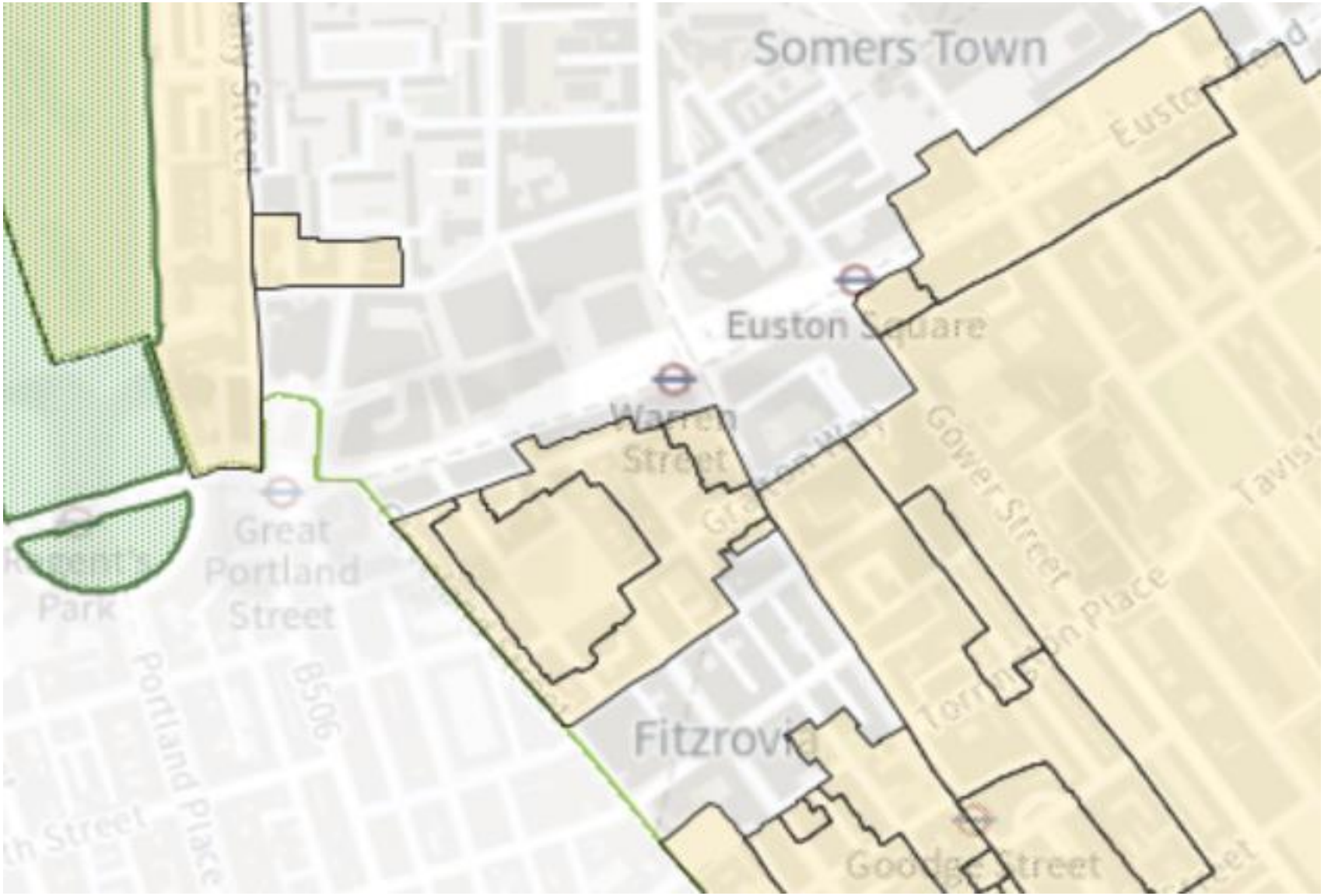
20th of March 2025

2023/5240/P

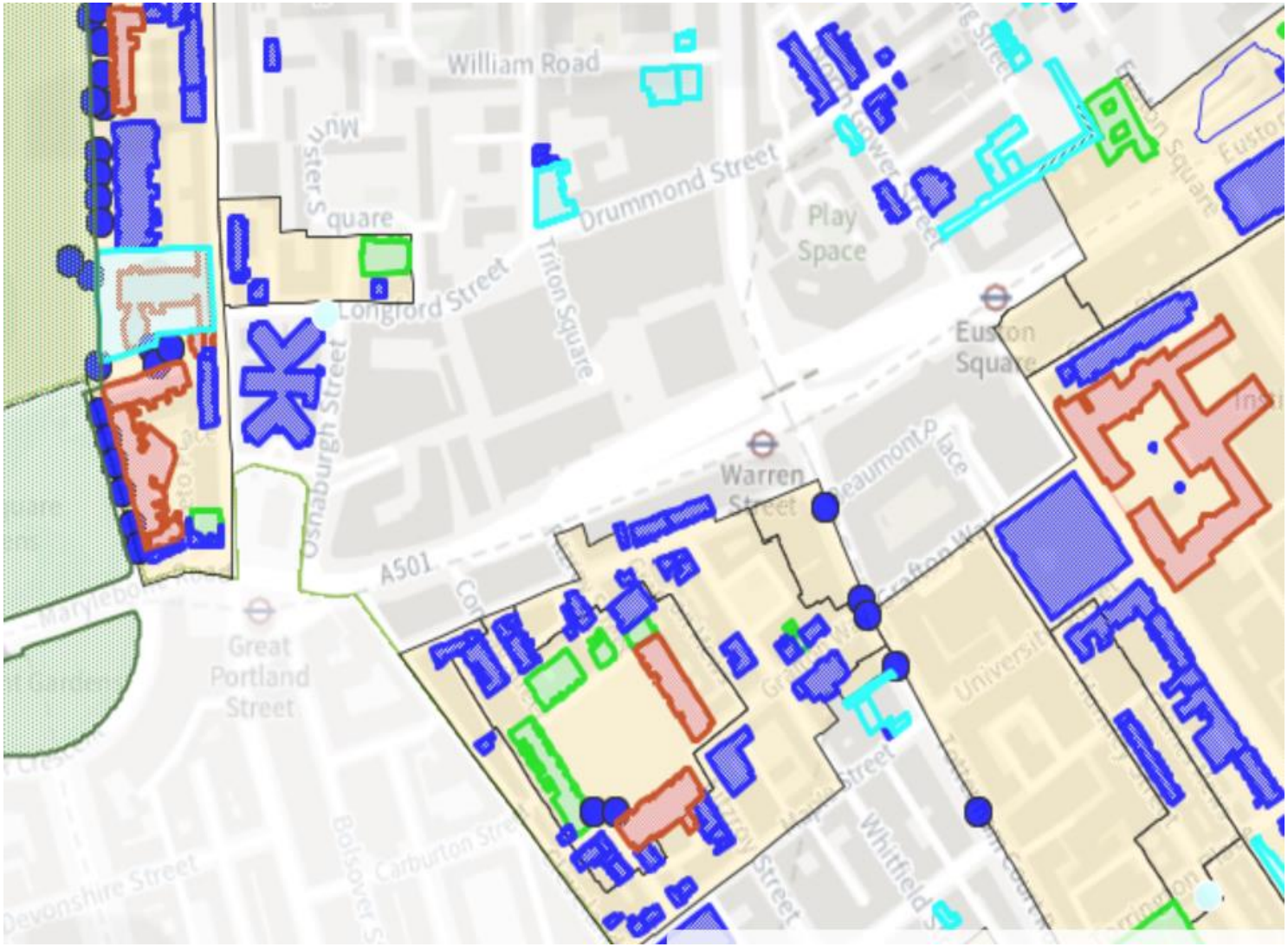
Euston Tower
286 Euston Road
London
NW1 3DP

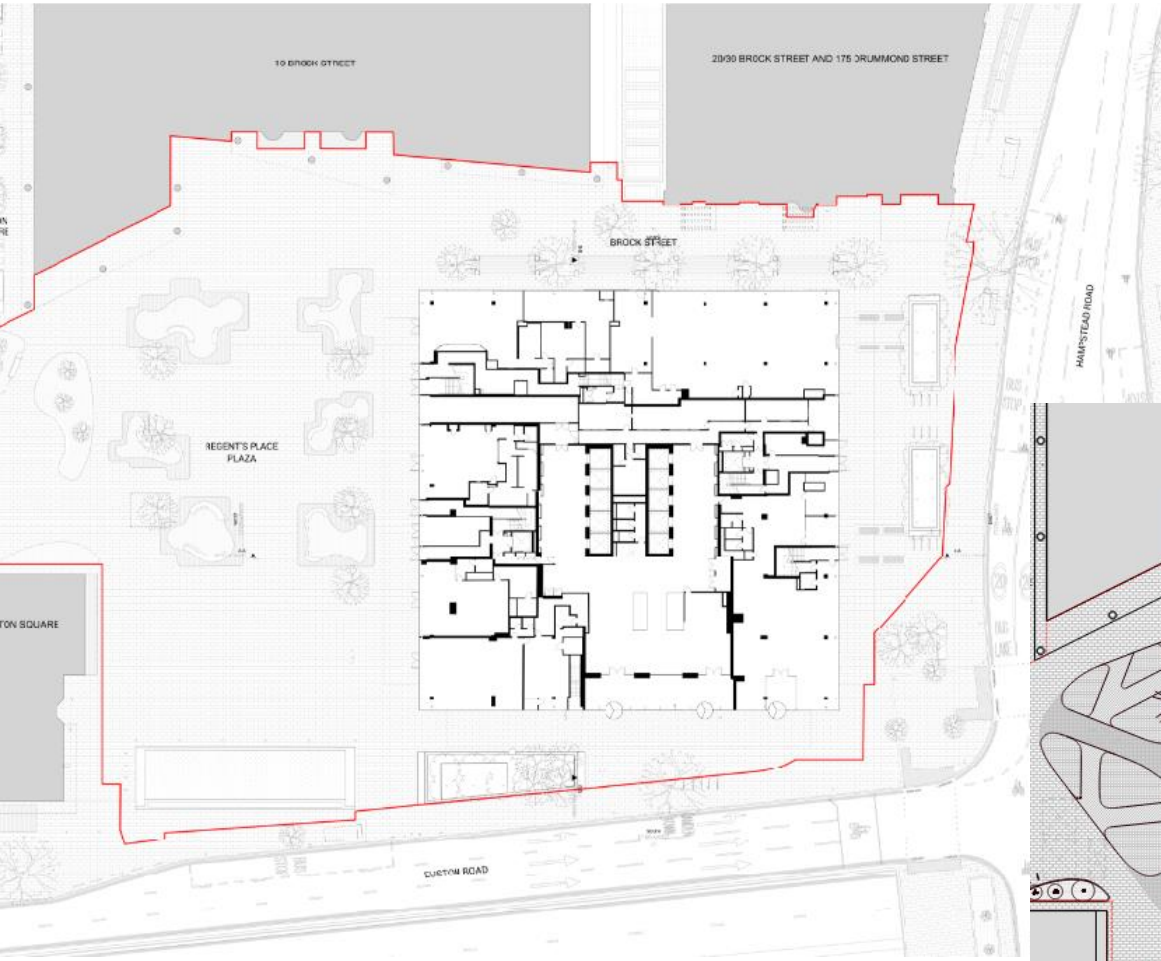

Regent's Place
Euston Tower
BRICK STREET
TRITON SQUARE
LONGFORD STREET
DRUMMOND STREET
HAMPSTEAD ROAD
EUSTON ROAD
MUNSTER SQUARE
Regents Park Centre
St Mary Magdalene's Church
Playarea
White House
TRITON STREET
OSNABURGH STREET
WARREN STREET
Hotel
Warren Court
Maple House
BEAUMONT PLACE
GRAFTON WAY
University College

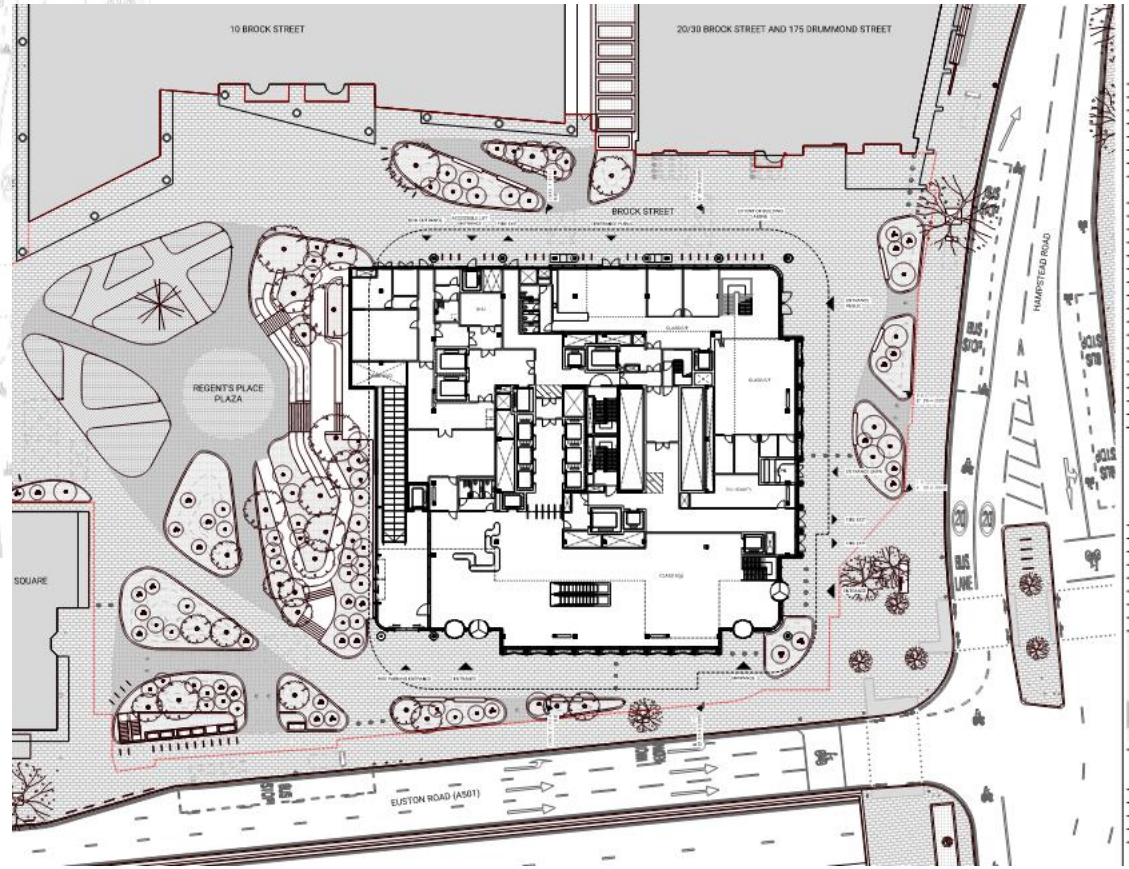
Images of existing Euston Tower



Conservation Area in the locality


William Road
Drummond Street
Play Space
Euston Square
Longford Street
Triton Square
Warren Street
A501
Great Portland Street
Devonshire Street
Carburton Street
Whitfield Street
Local List
Listed Building
I
II
II*



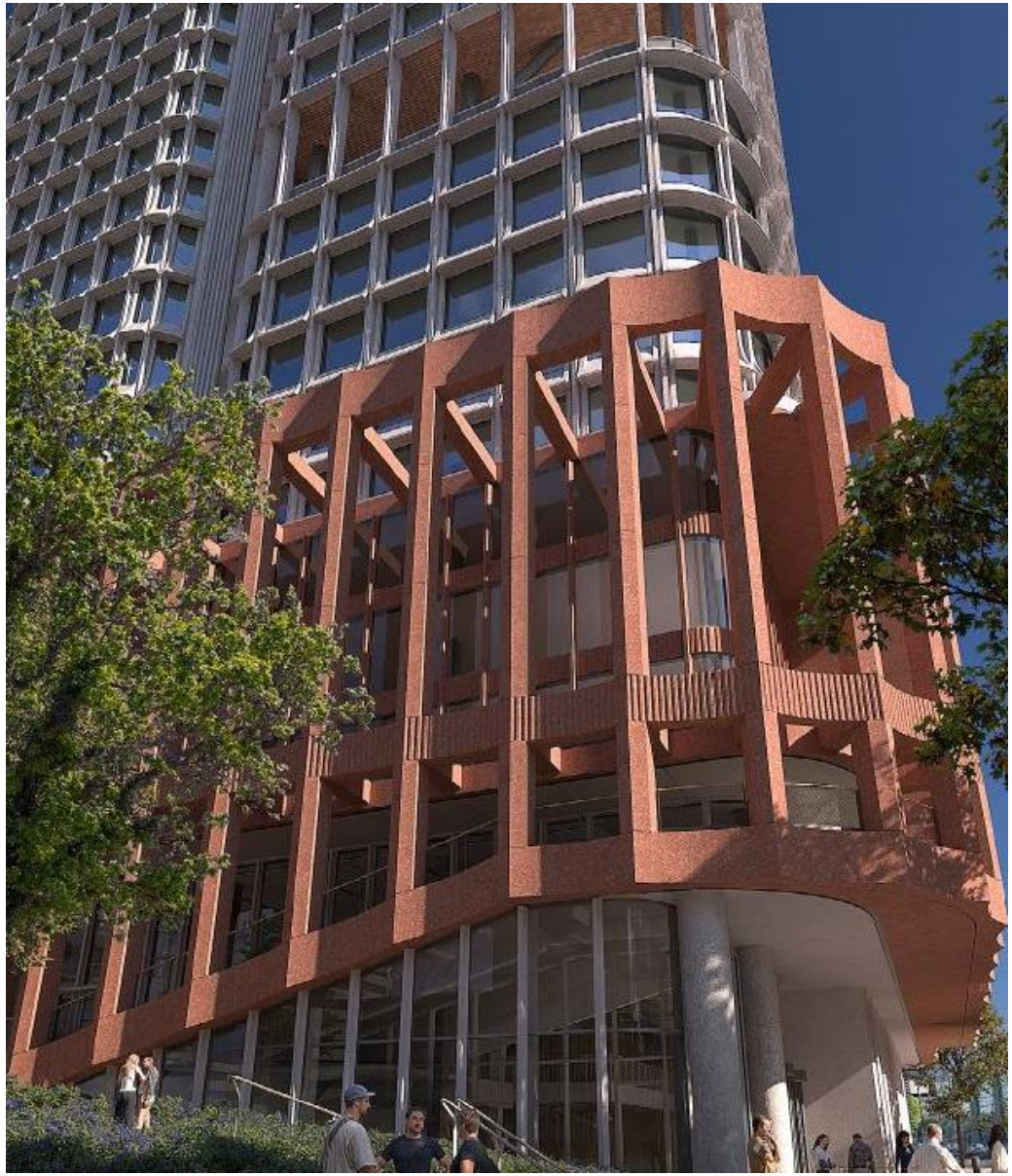


Existing and proposed footprint of tower

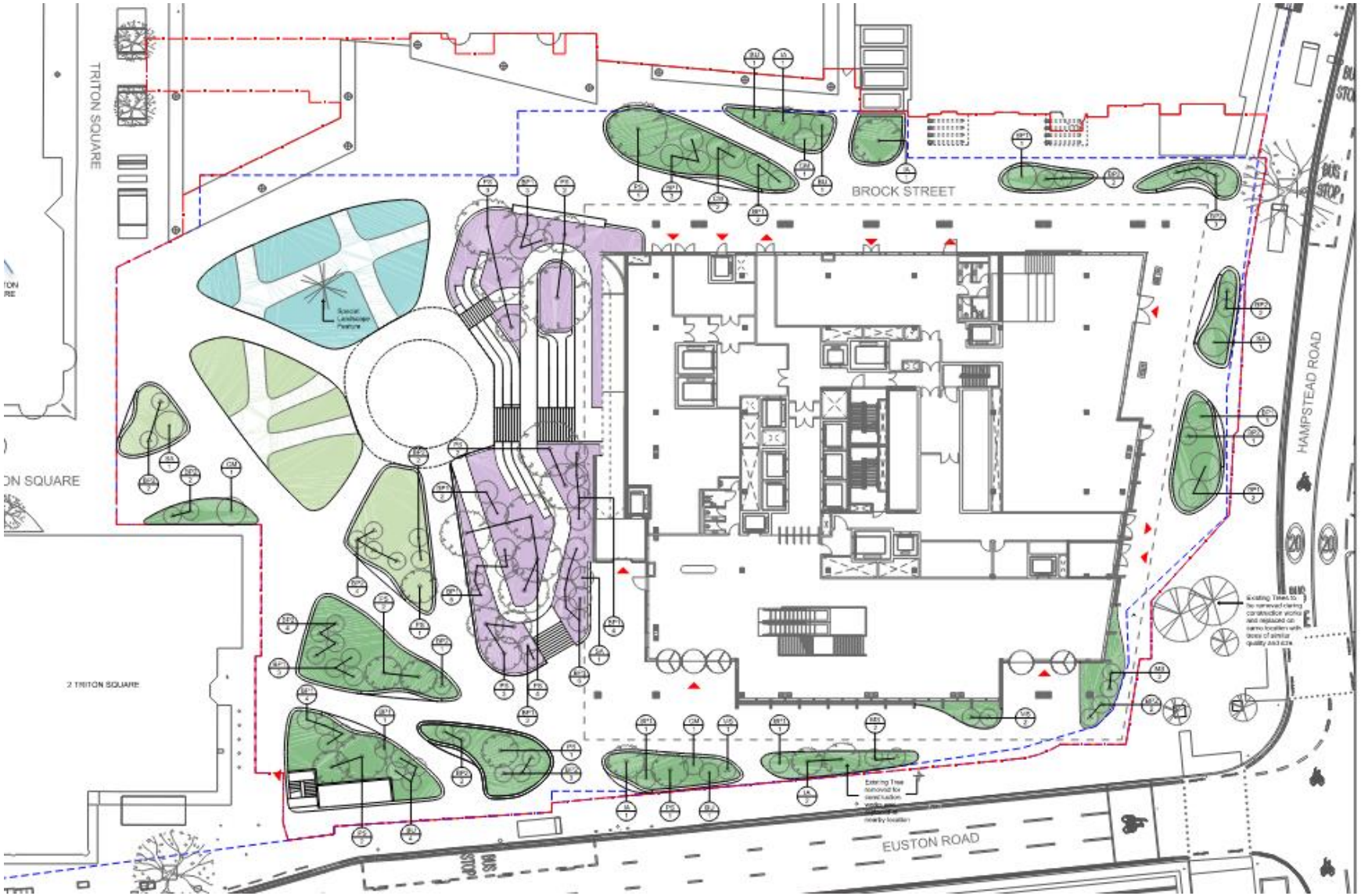
Verified View - Proposed Euston Tower from Tottenham Court Road, south of the A5204

Proposed view from top of Tottenham Court Road

Proposed view Regent’s Place Plaza



Illustrative view - View down Euston Road



Proposed landscaping