



CAMBRIDGE HOUSE, 373-375  
EUSTON ROAD, LONDON,  
NW1

PLANNING STATEMENT

January 2014

Our Ref: Q40123

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## DOCUMENTS

1	Application Site Plan
2	Site Planning History
3	Appeal Decision Ref. APP/X5210/A/02/1093951) dated 3rd December 2002
4	List of Application Drawings
5	Camden Council Pre-Application Response dated 19 <sup>th</sup> December 2013
6	MERJS Viewing Schedule, Cambridge House – October 2011 to August 2012

# 1 INTRODUCTION

1.1 This planning statement is prepared on behalf of S2 Estates Ltd in support of a planning application submitted to Camden Council for the proposed conversion and extension of Cambridge House, nos. 373-375 Euston Road, London ('the site' hereafter).

1.2 This submission seeks permission for the following development:

**“Change of use and re-cladding of existing building currently comprising part office use (Class B1a) and part car showroom (Sui generis) to provide flexible commercial floorspace at ground and basement floors (Use Classes A1/A2/A3 and B1), and 16 residential units in upper floors; roof extension to provide fifth and sixth floors; and associated external alterations.”**

1.3 The site comprises basement and ground floor sui generis car showroom use, previously occupied by Volvo. Volvo recently vacated the premises owing to the constrained nature of the site and the competition for large purpose-built car showrooms. The upper floors (1st, 2nd and 3rd) comprise vacant Class B1 floorspace of 724m<sup>2</sup>.

1.4 The application is supported by a series of technical documents required to demonstrate the acceptability of the application proposals in light of development plan policy, and policy guidance. The additional supporting documents comprise updates to the following documents:

- Design and Access Statement, prepared by Assael Architects;
- Daylight & Sunlight Report, prepared by Brooke Vincent and Partners;
- Acoustic Assessment prepared by
- Air Quality Assessment prepared by Environ;
- Energy and Sustainability Strategy prepared by Hoare Lea;
- Affordable Housing Statement prepared by DS2
- Commercial Floorspace Assessment prepared by Quod/Metrus; and

- Transport Statement prepared by Motion.

- 1.5 This planning statement explains the development in the context of the adopted development plan, and supports the application forms, certificates and relevant drawings. Section 2 describes the site and surrounding area. Section 3 describes the proposed changes, with section 4 providing a consideration to development plan policy. Section 5 provides a planning policy conformity assessment, with section 6 providing conclusions to this statement.
- 1.6 The submitted proposals are in accordance with local development plan policy and the National Planning Policy Framework and will result in an acceptable form of development based around a high quality design solution undertaken by Assael Architects.
- 1.7 The development is in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires development proposals to accord with the development plan. It is also in line with paragraph 14 of the adopted National Planning Policy Framework which establishes a presumption in favour of sustainable development for planning applications which accord with the development plan. These should also be approved without delay.
- 1.8 During the pre-application period, the applicant submitted detailed material to inform discussion within a meeting on 29<sup>th</sup> October 2013, including a site visit held on 11<sup>th</sup> November 2013. A detailed pre-application response was received dated 19<sup>th</sup> December 2013, which has informed the application proposals.

## 2 SITE AND SURROUNDING AREA

2.1 This section reviews the current characteristics of the site, and provides an overview of the surrounding area to provide a physical context to the application proposals. A plan illustrating the site boundary is provided at **Document 1**. Photographs of the site appear within the accompanying design and access statement.

### a) Site Description

2.2 The proposal relates to an existing building located on the corner of Euston Road, Cleveland Street and Warren Street. The site comprises a 4 storey plus basement building. The ground and basement levels are used as a car showroom (Sui Generis) and the upper floors are vacant offices (B1a).

2.3 The site is located within the Central Activity Zone (CAZ) and close to the boundary with Fitzroy Square Conservation Area and the borough boundary with Westminster.

### b) Relevant Planning History

2.4 A full review of the site's planning history is provided at **Document 2** to this report. However, there are two notable planning applications that should be highlighted relevant to the proposed development.

2.5 The most relevant of these decisions is application ref. PSX0105244 which was allowed at appeal in December 2002 for the following development:

**“Erection of roof extension (4th floor level), incorporating a mezzanine upper floor level for office use and installation of plant at roof level.”**

2.6 The approved design of this development is reviewed within the accompanying design material. This proposal was allowed at appeal, with the Inspector noting that both he and the Council accepted the principle of a roof extension in this location, and the Inspector noted the following relevant to the proposed massing in this location:

**“I am unable to agree with the Council’s assessment of the prospective impact of the proposal. In relation to the proposed mezzanine I note that in both the previously approved and present appeal proposals this feature would be set well back from the edge of the building on both the Cleveland and Warren Street elevations. A partial and longer distance view would be possible from Cleveland Street, at some distance to the south, beyond Greenwell Street. However, I do not consider that the mezzanine would be unduly prominent or intrusive within the street scene or roofscape. In the longer distance view the mezzanine feature would be seen against the backcloth of taller buildings on the north side of Euston Road.”** (para 13, Inspector’s Decision, Ref. APP/X5210/A/02/1093951) dated 3rd December 2002)

- 2.7 A copy of the Inspector’s decision is included at **Document 3**. It is pertinent to note that the scale of development to the north of Euston Road has increased significantly since the publication of this decision.
- 2.8 The second relevant application (ref. PS9604170R1) pre-dates application ref. PSX0105244, and was originally approved in 1997 for a two storey roof extension. This was later renewed in November 2001. There is therefore clear precedent to roof extensions at this location.

### 3 PROPOSED DEVELOPMENT

- 3.1 This section describes the proposed development and defines the principal components of the scheme. The application is accompanied by a comprehensive set of visual and illustrative material, prepared by Assael which illustrates the development proposal and explains the rationale behind the design of the building.
- 3.2 A list of drawings submitted with this application is set out at **Document 4**.
- 3.3 The proposed development comprises a residential-led mixed use development, including 16 no. residential dwellings and ground floor commercial floorspace. The proposals seek to convert the existing car showroom and office floorspace, within a re-clad external building envelope, and the incorporation of an additional floorspace at fourth to sixth floor levels. The proposed residential development will seek to incorporate the following unit mix.

Unit Size	Number of Units	Size of Units (m <sup>2</sup> GIA)
1 bed	6	50 - 55
2 bed	7	70 - 100
3 bed	3	89 – 137
<b>Total</b>	<b>16</b>	-

- 3.4 In addition, a replacement active frontage is proposed at ground floor, provided within a flexible use range of A1, A2, A3 and B1(a) to maximise the occupational potential of the unit without compromising the amenity of the proposed and existing residential units in the vicinity. This will also contribute to the employment generating potential of the site by ensuring a range of occupiers can operate from the building.
- 3.5 The four storeys of the existing building have been designed to retain the existing internal structure and floor slabs while removing the existing external wall zone. This allows for the entire building façade to be re-clad improving the aesthetic while ensuring the apartments provide good quality



residential units. The three new build storeys are to be constructed of a light weight steel structure supported by the existing strengthened concrete columns.



## 4 PLANNING POLICY

4.1 This section comments on relevant development plan policy at national, regional and local levels, including established and emerging development plan policy.

### a) Development Plan

4.2 The site is situated within the London Borough of Camden, and as such a planning application would be determined against the relevant development plan, and other material considerations. The development plan consists of the London Plan (2011), Camden's Core Strategy (2010) and Camden's Development Management Policies (2010). The Camden Site Allocations document has been heard at Examination in Public, and as such would be afforded weight in the determination of planning applications.

### b) Development Plan Allocations

4.3 The site is not allocated for any particular use within Camden Council's Core Strategy proposal map, nor is the site specifically referred to in the adopted Core Strategy and Development Management Plan. The site is situated outside of the town centre boundary, albeit a neighbourhood centre is situated along Cleveland Street within 100 metres.

4.4 The site lies adjacent to the borough boundary between Camden and Westminster, and sits close to the Fitzroy Square Conservation Area. Significant open space assets are situated in close proximity (200m) at Regents Park to the north west, and within 150 metres of Fitzroy Square to the south east. The site also benefits from the highest possible accessibility rating in London of 6b.

4.5 The policies relevant to the current proposals are considered individually within the analysis part of this submission.

### c) National Planning Policy Framework

4.6 In March 2012 the government published the National Planning Policy Framework (NPPF). The NPPF replaces previous national planning policy guidance. At para 12 the NPPF states:

**“National Planning Policy Framework (NPPF) does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.” (Quod emphasis)**

- 4.7 The core principle underpinning the NPPF is the presumption in favour of sustainable development. As clearly stated at para 14:

**“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking.**

**For decision-taking this means:**

- a. **approving development proposals that accord with the development plan without delay; and**
- b. **where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:**
  - **Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or**
  - **Specific policies in this Framework indicate development should be restricted.”**

- 4.8 The central theme of the NPPF is the presumption in favour of sustainable development, and encourages local authorities to approve applications swiftly that are in accordance with the development plan.

**d) Conclusions**

- 4.9 Planning policy guidance at all levels is supportive of the sustainable development, which is the golden thread running through the NPPF. The application site is not subject to a site specific allocation and thus is subject to the wider provisions of the development plan and material considerations relevant to the proposals.

## 5 PLANNING ASSESSMENT

5.1 This section provides an assessment of the application proposals in light of development plan and material considerations relevant to the scheme. For the ease of reference, the chapter is presented in the same order as the application pre-application correspondence, which is provided at **Document 5**. Camden Council pre-application comments are provided in bold, with the application response provided below.

a) **Land Use**

**“The pre-application documentation includes a Commercial Assessment which assesses the proposal in relation to the points in paragraph 13.3 of DP13, however it does not specifically address paragraph 6.4 of CPG5. This should be fully addressed in any future planning application submission.**

**Paragraph 6.4 of CPG 5**

- a. **the age of the premises. Some older premises may be more suitable to conversation;**
- b. **whether the premises includes feature required by tenants seeking modern office accommodation;**
- c. **the quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion;**
- d. **whether there are existing tenants in the building, and whether these tenants intend to relocate;**
- e. **the location of the premises and evidence of demand for office space in this location; and**
- f. **whether the premises currently provide accommodation for small and medium businesses.”**

5.2 Each bullet is responded to in turn below, and demonstrates compliance with the requirements of CPG5:

**“a. the age of the premises. Some older premises may be more suitable to conversation”**

5.3 The building is understood to have been built in the 1920s, and whilst it is not clear what use the original building was, subsequent internal re-fits and configuration have sought to keep the building in use. However, the building has since declined to the point where it has now reached the end of its economic life and no longer contributes to the office stock in the area.

**“b. whether the premises includes feature required by tenants seeking modern office accommodation”**

5.4 The existing floorspace does not provide the necessary features to attract modern office occupiers, which is evidenced by a full report undertaken by GL Hearn into the requirements necessary to bring the building up to modern standards; this appears at document 5 of the application Commercial Floorspace Assessment. The required works are summarised below:

- The electrical services are at the end of their functional life, and would need to be replaced in order to ensure the building complies with requisite safety regulations and ensure a consistent supply to future occupants.
- The building requires a new lift;
- Complete replacement of current dated and failing air conditioning systems;
- Replacement glazing throughout;
- As part of any refurbishment, and as a consequence of the work required to replace the M&E systems within the building, new raised floors and suspended ceilings will be required.

**“c. the quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion”**

5.5 These are significant works, which are costly and would need to be undertaken in the view of a reasonable expectation that this would lead to the space being let. Section 4 of the Commercial

Floorspace Assessment identifies a significant over-supply of both grade A and non-grade A floorspace in the area, which is space that is already well suited to office needs, and would be in direct competition with Cambridge House were this space to be upgraded. It is highly likely that owing to the location of the building, its proximity to much larger, purpose built grade A office buildings with large floorplates, and the existing supply of smaller office spaces in better locations, which means that such an investment would not be viable. Indeed, the deficiencies of the existing space are noted within the viewing schedules supplied by the marketing agents (MERJS / Metrus), relating to both the first floor enquiries and those relating to the entire building. These demonstrate a range of issues associated with the building, but notably highlight deficiencies with the existing floorspace that were not appropriate to the requirements of prospective tenants. It is appropriate therefore to consider the space for conversion.

**“d. whether there are existing tenants in the building, and whether these tenants intend to relocate”**

5.6 There are no tenants in the building, and the previous tenants notified their intention to vacate the space prior to their contractual break clause in June 2013. The office space has been vacant since December 2012.

**“e. the location of the premises and evidence of demand for office space in this location”**

5.7 The Commercial Floorspace Assessment has provided a comprehensive review of the level of demand for office floorspace in this location, and has also provided a review of available supply of similar space within the wider Fitzrovia area. There is a demonstrable over-supply of this and other similar space in the area, with the dominant demand in this location for Grade A space over larger floorplates. Conversion / loss of such space is therefore justified against this criteria.

**“f. whether the premises currently provide accommodation for small and medium businesses.”**

5.8 The space does not currently accommodate any tenants, including small or medium size occupiers. Furthermore, the existing office space does not meet the requirements of small/medium size business occupiers by virtue of the site’s difficult location in proximity to much better, higher

quality new office space. Additionally, the quality and configuration of the existing space, renders the floorplates unsuitable for small and medium occupiers.

- 5.9 In considering whether there would be demand for smaller units of circa 100m<sup>2</sup> by splitting the floors there would need to be justification in the capital expenditure required to create such accommodation. There are a number of restrictions that are affected by this such as how the services would be split, loss of natural light to certain areas and the actual physical layout of the space being created and whether this would be sufficient for a tenants purpose. We had considered this exercise but the marginal difference in the rental levels that would be achieved simply did not justify the capital expenditure required. Furthermore, this was also ruled out at the time for additional reasons as there was first an oversupply in the marketplace of smaller self-contained suites available and secondly if the building were to accommodate a significantly increased number of tenants the majority of these would require a commissionaire or receptionist located within the ground floor which, would have added further cost the service charge expenditure and made the floors even less attractive in terms of occupational cost.

**“However, it does not specifically address paragraph 6.4 of CPG5. CPG5 states that where it would be difficult to make an assessment using the criteria set out above marketing evidence may also be required.”**

**“In terms of the quality of the existing accommodation it is acknowledged that a level of works is required to make the office space attractive to prospective tenants. This includes repairs works to the lift, noise installation of the windows, and a cosmetic face-lift. However it is not of such poor quality that the Council would accept its loss without evidence that the possibility of using the space for other business uses has been fully explored over an appropriate period of time.”**

- 5.10 This comment is accepted, and that is why evidence as presented within the application Commercial Floorspace Assessment has been submitted.

**“You have provided marketing evidence which confirms that the site has been marketed from October 2011 but was only vacated in October 2012. However, additional marketing evidence has been found which suggests that the office space only became vacant in June 2013.”**

5.11 This statement is incorrect. The 1st floor has been vacant for a period of 2009-2010 and 2012-2014. In addition, the sales particulars referred to do not state vacancy in June 2013. The Michael Elliot particulars refer to rent payment up to June 2013, but there was no occupancy. Business Rate records for example in February 2013 confirm vacancy.

**“In your submission you should provide a clear chronology of the use of the premises and all marketing that has been undertaken, this should all be backed up with evidence.”**

5.12 This is enclosed at Section 6 of the Commercial Floorspace Assessment.

**“You have provided a viewing schedule with comments made by prospective tenants which covers the period of August 2012 until October 2013. However, it is not clear if any interest was shown by prospective occupiers from October 2011 to August 2012 when Mace were still occupying the space. You will need to provide evidence of marketing and a viewing schedule for this time period as well including any offers received.”**

5.13 The marketing viewing schedule for the period October 2011 to August 2012 is enclosed at **Document 6**. This document details the extent of enquiries, viewings and subsequent narrative on the marketing exercise.

**“Many of the comments made by prospective tenants are that the office is in the wrong location or is not large enough. They would have had information on the location and size of the office in advance of any viewing, as such it is not clear why they viewed the accommodation in the first place. Further information on this would be helpful.”**

5.14 This is not the case and review of the comments demonstrates this. In any event any party will need to review (on-site) a premise to fully understand whether the precise location is acceptable. The schedule shows a wide range of interested parties ranging from floor requirements (of less 185m<sup>2</sup>) to requirements for the whole building. As identified, the reasons for not taking the floorspace are wide and varied.

**“Principle 4 of the Fitzrovia Area Action Plan states that the Council will support Small and Medium term Enterprises (SMEs) by ensuring that existing business premises suitable for SME use are retained. The basis for this is that the multitude of SME’s are a valued part of the areas character and premises**

**that can provide lettings of less than 100sqm should be retained for their use. 60% of jobs in the Fitzrovia area are SME's, with under 200 employees."**

- 5.15 SME's are defined as "businesses employing less than 50 people (small) and or less than 250 (medium), European Commission Recommendation 2003/361/EC). The Principle states that "The Council will particularly seek to mention a supply of premises that can provide lettings of less than 100sqm". As each floor is 241m<sup>2</sup>, by default the premises will not provide less than 100m<sup>2</sup>. Indeed half a floor will not meet this test. On a simple qualitative analysis the site is not suited for SME's.

**"Each floor of the building is around 241sqm and if each floor was let individually this quality and size of floor space, despite its constraints, may well be attractive to a SMEs who often seek second hand office accommodation in this location. As such, in order to support a proposal for loss of employment floorspace at this site evidence that the space has been marketed flexibly giving the option of taking the floorspace floor by floor or as a whole would be required."**

- 5.16 The prospective tenant schedule demonstrates that all tenants are likely to be SME's due to floorspace requirements. The 1<sup>st</sup> floor was marketed by itself from 2009-2010 with no interest. The remaining floors were marketed and shown to occupiers requiring only one floor. Indeed the tenant list shows at least 20 SME's whose interest is only for one floor. Flexibility has been shown.

**"You should also fully explore sub-dividing the space and marketing it to smaller businesses and start-ups. Including options of appointing a managing agent to undertake the management of the smaller workspaces, if appropriate. If it is found that the space would be suitable for SMEs the Council would resist it loss."**

- 5.17 As above. The space has been marketed to SME's who require less than a single floorplate. No genuine interest has been received. Practicalities of introducing additional fit-out to accommodate these smaller business spaces were not discounted on principle during the marketing of the site, but practical issues associated with sub-division, including the potential subdivision of services, introduction of dedicated reception space in a communal area, when coupled with the associated rental value implications meant that no genuine interest was shown in the floorplates. Additionally, it is evident from Section 4 of the application Commercial Assessment that there is ample similar



office supply in Fitzrovia of 31,037m<sup>2</sup> (see document 3 of application Commercial Assessment). It is clear therefore that the building is not suitable for SME space.

**“Based on the level of information currently provided officers cannot accept the loss of office floorspace. However, this position may change if the additional marketing evidence requested above were to be robust enough and sufficient to demonstrate that there is no demand for the employment floorspace.”**

5.18 In light of the above we consider that evidence has been submitted to demonstrate demand.

**“I have attached to this letter a recent appeal decision in the Fitzrovia Area which demonstrates the importance of providing robust marketing evidence.”**

5.19 We note the appeal decision, but also note that this case is fundamentally different as substantial marketing has been submitted and discussed herein, and within the accompanying Commercial Floorspace Assessment, which was not the case in the appeal scheme.

**b) Loss of the Car Showroom**

**“There is no policy which specifically protects this type of use. As the use provides employment opportunities it would be beneficial for the replacement use to also provide employment. The creation of A1-A3 or B1 floorspace would provide employment opportunities as such this is considered to be an appropriate replacement use.”**

5.20 We disagree. There is no protection for sui generis uses (which have now vacated) in the Development Plan. The creation of A1-A3 and B1 is not a “replacement of a sui generis use”. Any re-provision of 308m<sup>2</sup> should be offset from the 724m<sup>2</sup> Class B1a floorspace.

**c) Creation of A1-A3 or B1 use at Ground Floor and Basement Level**

**“In this instance, given that the existing use is essentially retail and the precise location of the site on Euston Road, the creation of a retail or restaurant unit of this size is unlikely to be objectionable. However, if the proposed use is to be a restaurant, kitchen ventilation should be integral to the design of the building. The addition of external flues would not be permitted. Hours of operations may also be conditioned to ensure the use would not impact on the amenity of neighbours.”**

5.21 Please note that kitchen ventilation has been designed internally and shown on plans.

d) **Mix**

**“At present the mix is not considered to be appropriate as the proposal provides too many 1 bed units for which there is lower demand. The proposal should contain a 40% two bed units and greater number of family units.”**

5.22 The mix has been changed to comprise the following:

Unit Size	Number of Units	% of Total Units
1 bed	6	37%
2 bed	7	44%
3 bed	3	19%
<b>Total</b>	<b>16</b>	-

5.23 This therefore addresses this requirement, and the scheme now complies with the preferred mix as identified within the Camden Dwelling Size Priorities Table.

e) **Affordable Housing**

**“You are advised to provide a supporting statement and details of discussions with RPs and confirmation that they would not be willing to take on floorspace within the building. Details for calculating the affordable housing contribution are contained with CPG3 and CPG8.”**

**“An open book financial viability appraisal, which shall be independently assessed at the applicant’s cost, would be required should a less than 12% provision be provided by the applicant.”**

5.24 A supporting statement, detailing discussions with RPs, and confirming that these are not willing to take floorspace within the building is provided by DS2. An appropriate contribution is calculated and will be secured through an appropriate agreement with the Council.

f) **Lifetime Homes and Wheelchair Housing**

**“All units should meet lifetimes homes standards. This should be demonstrated in the submission by way of a Lifetimes Homes Assessment.”**

**10% of the homes should either meet wheelchair housing standard or be easily adaptable to meet the standards.”**

5.25 This is detailed within the application DAS, and confirms that 10% of the homes will be delivered to be adaptable to meet wheelchair housing standards, and all units will meet Lifetime Homes standards.

**g) Design**

*i. Bulk, height and design*

5.26 The Conservation Officer is satisfied with the general design and scale of the proposed building on the corner of Cleveland Street and Warren Street. The design will complement the surrounding area and will respect the height of neighbouring properties.

**“Concern is raised by the height of the proposed frontage building on Euston Road which is considered excessive in terms of height, bulk and scale particularly when seen in the context of the street scape on this side of the Euston Road. The proposed height will also have some impact on the long views of the Listed BT Tower which is clearly visible from this part of the Euston Road. As such, it is suggested that the proposal is amended by reducing the height of the building.”**

5.27 It is considered that the height of the building is not excessive in the context of the context of the site, and the high quality response to addressing the site’s location across from the British Land scheme and other taller buildings in the vicinity.

5.28 However, notwithstanding this, to respond to the Council’s comment the buildings has been reduced by 0.6m as advised. The top floor has also been redesigned and set back by 1m to further mitigate the view from the street. The height is not excessive in the street scene and replicates no. 365 Euston Road book-ending the street scene. Views of the BT Tower are also submitted, as detailed within the application DAS at page 73. This demonstrates that the scheme has no adverse impact on views of the BT Tower.

*ii. Detailed design and material*

**“The material proposed is a pink/red sandstone. This material is considered to appear out of keeping with the more traditional materials in the locality of the application site. It is suggested that you use a more traditional pallet which would better relate to the surrounding building materials.”**

5.29 The pallet has been altered to brick as detailed in Section 5.6 of the DAS.

**“The ground floor window opening to the retail units on Cleveland Street is considered to be excessively wide and does not relate to the fenestration at upper levels, it is suggested that this window is intersected with a vertical solid pier to help ground the building and the better integrate the design.”**

5.30 The design has been altered to provide vertical solid piers, as detailed at page 57 of the DAS.

h) Trees and Biodiversity

i. Trees

**“There is a street tree on Euston Road which may be affected by the proposals. The building should be designed so as not to impact on this street trees. A BS:5837 2012 report (Trees in relation to design, demolition and construction) will be required.”**

5.31 A BS5837:2012 report (Trees in relation to design, demolition and construction) is submitted with the application. This demonstrates that throughout the construction phase and the scheme once delivered will ensure that the tree to the front of the site will not be adversely impacted by the proposals.

ii. Biodiversity

**“A proposed roof plan has not been submitted with the pre-application documentation. You are advised the main roof of the building should be a green or brown roof. You are also advised to incorporate bird boxes into the design of the building, specifically swift bricks on the north elevation of the building.”**

5.32 A brown roof is now provided as detailed on the roof plan, albeit not on the top floor due to the lightweight construction. Bird boxes are also now included. See Design and Access Statement page 58.

i) **Quality of Residential**

**“The units to the front of the building would face directly onto Euston Road. These units would be dual aspect, however the windows on the side elevation would also be located very close to Euston Road. Euston Road is a major thoroughfare through London which has heavy traffic which emits high noise volumes 24 hours a day. You have advised that the new building and windows would be designed on to attenuate this noise. However, in the front flats even if this noise is attenuated it would not be possible to open windows to allow natural ventilation. This is disappointing and would result in the resident accommodation towards the front of the building being poor quality. It is suggested that you explore an alternative layout to improve the residential quality of the units.”**

5.33 We fundamentally disagree. By default as accommodation which is mechanically ventilated is not “poor quality” and is found throughout similar locations in London and Camden.

**“All habitable rooms should have access to natural light. A number of the 1 bed units to the rear would have kitchens which do not have access to natural daylight. In accordance with the BRE standards kitchens should have an Average Daylight Factor (ADF) of no less than 2%. The layout should be amended so that all habitable rooms have daylight levels with comply with BRE guidelines.”**

5.34 This is not correct. The kitchens are separated and therefore are not habitable rooms. Therefore they do not require ADF of 2%.

**“All units would meet or exceed the Mayor’s space standards in terms of overall floor areas. All 1st and double bedrooms should have a minimum are of 11sqm and single rooms should have a minimum floorarea of 6.5sqm. All bedrooms on the originally proposed scheme seem to comply with this. I have not been provided with scaled plans for the proposed amended layout set out in Pre-Application Review dated 29 October 2013, however it does appear that the bedroom of the single aspect units to the rear of the building at 1st to 3rd floor level may fall slightly below this minimum standard. This should be checked and amended if necessary.”**

5.35 See the application Design and Access Statement.

**“The site’s location next to a busy road will necessitate the submission of Noise and Air Quality assessments with any future application in accordance within polices DP26, DP28 and DP32.”**

5.36 This detail is submitted with application. The submitted noise assessment includes an assessment of the proposed plant.

j) **Neighbouring Amenity**

**“In order to fully assess impact on this property I would need you to undertake a VSC test as well as ADF. If the proposal result in a VSC being reduced by less than 27% or less than 0.8 times its former value if less than 27% to begin with the proposal is likely to have significant impact on neighbour amenity and may result in officers not being able to support the proposal.”**

**“A full daylight and sunlight study should be provided with any future application.”**

5.37 Please refer to the application Design and Access Statement, which confirms that No. 175 Cleveland Street is not materially impacted.

k) **Transport**

i. **Cycling**

**“In total based on the current mix 20 spaces are required.”**

5.38 Due to a reduction to 16 units, 19 cycle spaces are required and now provided within a secure location. Details of how this is accessed and the location of this store is provided at page 62 of the Design and Access Statement.

**“As outlined in CPG7, ‘cycle parking needs to be accessible (in that everyone that uses a bike can easily store and remove a bike from the cycle parking) and secure. The route from cycle parking to street level should be step free. Cycle parking inside buildings should be at the entrance level of the building or accessible by a ramp or lift from street level that can accommodate a bike’. It is noted that a lift is being proposed to take cycles down a level to the basement where cycle storage is proposed. You should demonstrate in any application that all other avenues to host the cycle provision at ground floor level have been exhausted.”**

5.39 Cycle storage has to be in the basement to avoid impact on the building frontage and to avoid loss of Class A1, A3 and B1 floorspace.

### **Construction Management Plan (CMP)**

**“DP21 seeks to protect the safety and operation of the highway network. For some development this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP) secured via S106. Given the level of demolition and construction a CMP would be required. Please see Chapter 8 of CPG6 for more details on the requirement for a CMP.”**

- 5.40 The proposed construction of the proposed development involves limited demolition owing to the super-structure being retained, and the external envelope being completed as a re-cladding solution. Notwithstanding this, the application Design and Access Statement indicates Construction Management Plan principles to guide the construction management plan (section 5.11). The full and final detail of the Construction Method can be secured via a condition to limit the potential for disruption through the construction process.

#### **l) Basements**

**“Existing and proposed sections have not been provided therefore it is not possible to establish whether any excavation is proposed, if you are proposing any excavation you should consider the following.”**

- 5.41 Existing and proposed elevations are enclosed, which demonstrate no excavation being required.

#### **m) Sustainability**

**“An energy statement should be submitted with an application of this nature which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy. CPG3 - Sustainability provides guidance on what should be included in an energy statement. For a development of this size the Council would expect the applicant to explore the opportunity of linking up to an existing or future decentralised energy network. Further details can be found in CPG3- Sustainability.”**

**“The new residential units would be required to meet as a minimum ‘Code Level 4’ in a Code for Sustainable Homes Assessment and the new commercial**

**floorspace would be expected to meet ‘very good’ in a BREEAM Assessment. An assessment should be submitted as part of any application submission, with a post construction review to be carried out as a condition/legal agreement of any approval.”**

5.42 An energy statement is enclosed confirming Code Level 4 and BREEAM Very Good will be achieved.

**n) Conclusions**

5.43 The principle of development is justified fully relative to development plan policies, including supplementary guidance provided in CPG5. This demonstrates that the upper floors of the building are appropriate for conversion to residential accommodation. The principle of development at ground and basement floors is also acceptable in principle.

5.44 The replacement commercial floorspace will enhance the current employment floorspace offer by delivering modern, well-designed, flexible and high quality space that will enable a range of occupiers to ensure active frontages are provided in this location.

5.45 The proposals will deliver a significant improvement to this prominent location, replacing a very poor and tired empty building with a high quality building of excellent design quality, which has been refined in discussion with Camden officers. The palette of materials, general design, layout and bulk and massing represent a strong response to the site’s context. Residential units will be provided to meet all relevant standards.



## 6 CONCLUSIONS

6.1 This planning statement has sought to address a variety of planning issues which arise as a result of the redevelopment of Cambridge House, 373-375 Euston Road. The planning statement is one of a suite of supporting documents which justify the proposed development, all of which should be read holistically.

6.2 To conclude the planning application should be granted planning permission for the following reasons:-

- Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be undertaken in accordance with the development plan unless material considerations indicate otherwise. This proposal is in accordance with development plan policy, and in addition, there are material considerations which would support the grant of planning permission.
- The adopted NPPF (2012) promotes a presumption in favour of development. It confirms that planning applications undertaken in accordance with the development plan should be approved “without delay”. As this submission is made in accordance with the development plan we consider that a decision should be made “without delay”.
- The adopted NPPF states that where the development plan is silent or absent on a particular matter, then planning permission should be granted unless “any adverse effect of doing so would significantly and demonstrably outweigh the benefits” of the development. There are no “significant and demonstrable adverse effects” of this development that exists in the first instance. Secondly, even if there were, then they would not outweigh the “benefits” of the proposal.
- The submitted Commercial Floorspace Assessment demonstrates that there is no prospect of the current office use of the upper floors continuing, and no alternative B Class use would be viable or suitable for the application site. It is therefore demonstrated that the building is appropriate for release to residential use.

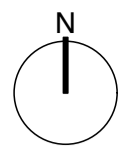
- The conversion of the lower floors to provide a commercial unit, which will contribute to the wider aims of ensuring that the ground and basement floors are brought back into viable employment generating use, should be supported by policy at all levels.
- The application design achieves a Code for Sustainable Homes Level of 4, would aim to achieve BREEAM 'Very Good' rating, relative to the commercial floorspace, and would achieve a carbon reduction 60% greater than benchmark performance, which is in excess of London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions).
- The proposed residential accommodation is designed to the Mayor Housing Design Standards and minimum unit standards and provides a suitable mix of larger family units.

6.3 This development proposal therefore accords with the development plan. There are also significant material considerations which weigh in favour of the grant of planning permission.



DOCUMENT 1

APPLICATION SITE PLAN



**GENERAL NOTES**

All settings must be checked on site and refer to Ordnance Datum Newlyn unless alternative Datum given  
 All bearings and weathings must be checked on site  
 All dimensions must be checked on site  
 This drawing must be scaled  
 This drawing must be read in conjunction with all other relevant drawings and specification clauses  
 This drawing must not be used for land transfer purposes  
 Calculated areas in accordance with Assael Architecture's Definition of Areas for Schedule of Areas  
 This drawing must not be used on site unless issued for construction  
 Subject to survey, consultation and approval from all statutory Authorities

Revision Status:  
 P-Preliminary C-Contract

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**DRAWING NOTES**

E-FILE REF N° A2413 Cambridge House Working Plans

STATUS	REVISION	DATE	DRN	CHK	CDM
P15	PLANNING SUBMISSION	20.01.14	KS	LW	..



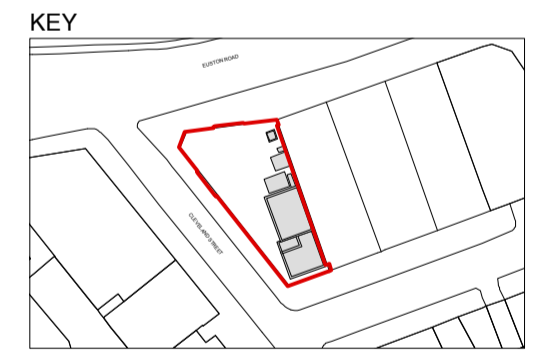
**SITE LOCATION PLAN**  
 1:1250 @ A1



**EXISTING SITE PLAN**  
 1:500 @ A1

**KEY**

	APPLICATION BOUNDARY
--	----------------------



CLIENT  
**S2 Estates (Euston Road) LLP**

PROJECT TITLE  
**373-375 Euston Road**

DRAWING TITLE  
**Existing Site Plan**

SCALE @ A1 SIZE / A3 SIZE	DATE
<b>VARIES</b>	<b>June '13</b>
DRAWING N°	STATUS & REVISION
<b>A2413 100</b>	<b>P15</b>

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DOCUMENT 2

SITE PLANNING HISTORY

**Planning History Schedule – Cambridge House, 373/375 Euston Road, London**

Application Reference	Description of Development	Decision / Date
22749	The change of use of the ground floor and basement from storage and packing to showroom with ancillary offices and storage, and of the first, second and third floors from ancillary offices to offices.	Refused / 22 <sup>nd</sup> July 1976
23263	Change of use of basement from storage to storage and Committee rooms and ground floor from warehouse and packing to despatch and printing	Approved / 26 <sup>th</sup> November 1976
25763	Use of ground floor and basement as car showrooms and storage of motor vehicles. Use of upper floors as non-ancillary offices.	Approved / 17 <sup>th</sup> April 1978
8401100	Change of use of the basement and ground floors from car showroom to showroom for car radios & telephones and workshop for the installation of such equipment in cars as shown on drg. nos.SK1 & SK2.	Approved / 19 <sup>th</sup> September 1984
9100236	Use of ground floor as a car showroom together with the basement as a car repair workshop and car storage area as shown on location plan 1 (numbered 01.91.W7216).	Approved / 1 <sup>st</sup> August 1991
AD1412	373-375 Euston Road, N.W.1. The display of six internally illuminated signs as follows:- (i) Two double-sided projecting box signs, each measuring 0.852 metre x 0.750 metre, one on the Euston Road frontage and one on the Warren Street frontage. (ii) Four fascia signs, one located on the Euston Road frontage measuring 8.125 metres x 0.546 metre; one positioned on the Cleveland Street frontage measuring 29.2 metres x 0.546 metre; one sited on the splay frontage to Euston Road/Cleveland Street (2.826 metres x 0.546 metre), and the fourth situated on the return frontage to Warren Street measuring 5.601 metres x 0.546 metres. All the signs being 3.05 metres above ground level to the underside of the signs.	Approved / 12 <sup>th</sup> June 1980
PS9604170	Addition of extra level of office accommodation plus mezzanine at roof level, reconfiguration of existing roof level plant and formation of new enclosure to plant room, and redesigned entrance complete with new canopy and fenestration over. (Plans submitted).	Withdrawn / 7 <sup>th</sup> February 1997
PS9604170R1	The erection of a roof extension at fourth floor level incorporating a mezzanine upper level and rear plant for office use, as shown on drawing numbers ZER 1.01 - 1.06 and 2.01 - 2.07.	Approved / 21 <sup>st</sup> February 1997
PS9604313	Alterations to the entrance to the upper floors on Euston Road comprising new entrance doors, new elevational treatment and erection of a glazed canopy, as shown on drawing nos. 1.01, 1.06, 1.07, 1.20,	Approved / 6 <sup>th</sup>

	3.01 and 3.02.	February 1997
PS9604170	Addition of extra level of office accommodation plus mezzanine at roof level, reconfiguration of existing roof level plant and formation of new enclosure to plant room, and redesigned entrance complete with new canopy and fenestration over. (Plans submitted).	Withdrawn / 7 <sup>th</sup> February 1997
PS9604170R1	The erection of a roof extension at fourth floor level incorporating a mezzanine upper level and rear plant for office use, as shown on drawing numbers ZER 1.01 - 1.06 and 2.01 - 2.07	Approved / 21 <sup>st</sup> February 1997
PS9604313	Alterations to the entrance to the upper floors on Euston Road comprising new entrance doors, new elevational treatment and erection of a glazed canopy, as shown on drawing nos. 1.01, 1.06, 1.07, 1.20, 3.01 and 3.02	Approved / 6 <sup>th</sup> February 1997
PSX0104719	The erection of a part 1 + part 2 storey extension at roof level + installation of new plant. (Plans submitted).	Withdrawn September 2001
PSX0105014	Erect roof extension at fourth floor level incorporating a mezzanine upper level and rear plant for office use (Renewal of planning permission PS9604170R1 dated 21.02.97), as shown on drawing numbers: ZER 1.01-1.06 and 2.01-2.07.	Approved / 6 <sup>th</sup> November 2001
PSX0105244*	Erection of roof extension (4th floor level), incorporating a mezzanine upper floor level for office use and installation of plant at roof level, as shown on drawing number: P/001; P/104; P/201A; P/203A; P/205A; P/206A P/301; P/302; P/303; P/114A; P/115A; P/116A; P/202A; P/204A; P/ 206A; P/211A; P/212A; P/213A; P/302; P/304. Architects Report dated March 2002, Mechanical Report WSP 16030105/004 and Acoustic Report WSP 12100125	Refused / 2 <sup>nd</sup> April 2002*; Allowed at appeal / 3 <sup>rd</sup> December 2002.

**\*Reason for refusal:**

The proposal is unacceptable in that the construction of the EN24 and EN37 of the London Borough of Camden Unitary Development Plan 2000. roof extension would detrimentally increase the bulk, mass and form of the building and would result in the extension being an unduly dominant feature within the street scene. Furthermore the construction of the extension would result in a sheer elevation to Cleveland Street and Warren Street, which would be detrimental to the visual amenities of the views from the adjoining conservation area. Consequently the proposal is contrary to policies EN1, EN13, EN14, EN22.



DOCUMENT 3

APPEAL DECISION REF. APP/X5210/A/02/1093951





# Appeal Decision

10 DEC 2002

Site visit made on 11 November 2002

by **Keith Smith** BA (Econ) DipTP DPA FRTPI ACIS

an Inspector appointed by the First Secretary of State

The Planning Inspectorate  
4/09 Kite Wing  
Temple Quay House  
2 The Square,  
Temple Quay  
Bristol BS1 6PN  
☎ 0117 372 6372  
e-mail: enquiries@planning-  
inspectorate.gsi.gov.uk

Date

03 DEC 2002

**Appeal Ref: APP/X5210/A/02/1093951**

**373-375 Euston Road, London NW1**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by O + H Properties Ltd, as successors to City and St. James Property Ltd, against the decision of Council of the London Borough of Camden.
- The application (Ref.PSX0105244/R1), dated 25 January 2002, was refused by notice dated 9 April 2002.
- The development proposed is the erection of roof extension (4<sup>th</sup> floor level) incorporating a mezzanine upper floor level for office use and installation of plant at roof level.

**Summary of Decision: The appeal is allowed and planning permission granted subject to conditions set out in the Formal Decision below.**

## Procedural Matters

1. The application to the Council was submitted in the name of City and St. James Property Ltd. Between the refusal of permission and the submission of the appeal this company was incorporated into O+H Properties Ltd. The appeal has continued in the name of the successor company.
2. A number of modifications to the originally submitted plans were made during the consideration of the application by the Council. These are detailed on the Council's notice of decision. I have not been provided with a copy of Plan P212/A as part of the appeal documents. From the representations I understand that this shows an amendment to the Euston Road elevation by way of a minor revision to the roof slope. As this elevation was not the subject of objection in either the stated reason for refusal or the Council's representations I have been able to proceed in the absence of the amended plan.
3. As part of the appellant's representations I have been provided with a copy of earlier approved plans relating to a roof extension at the appeal site, for comparative purposes.

## The site, its surroundings and planning history

4. The site comprises a four-storey car showroom and office premises with frontages to Euston Road, Cleveland Street and Warren Street. The area contains mixed development with offices/flats ranging from 4-10 storeys to the north of Euston Road and 3/4 storey office/flat developments on the south side. Both sides of Cleveland Street contain a mix of commercial premises and houses/flats of varying scales. In Warren Street the south side is largely residential in character with terraced dwellings and mews courts. The north side has a mix of commercial premises and flats.

5. To the south of Warren Street is the Fitzroy Square Conservation Area and to the west of Cleveland Street, south of its junction with Greenwell Street, is a conservation area within the City of Westminster. The block of property within which the appeal site is situated lies outside any conservation area designation and no buildings within the block are listed as being of architectural or historic interest.
6. In 1997 permission was granted for a roof extension for office purposes at fourth floor level, including a mezzanine and roof plant room. This permission was renewed in November 2001 and remains extant.

#### **Planning Policy Background**

7. The development plan for the locality comprises the Camden Unitary Development Plan [UDP] adopted in 2000. Policies EN1 and EN13-14 seek to achieve environmental improvement and high standards of design in new development and safeguard the wider setting in terms of general character, architectural style, scale and general proportions of buildings and existing views/skylines.
8. Policies EN22 and EN24 relate specifically to extension proposals, including roof extensions. The objective is to maintain the form, proportions and character of the building and avoid dominance of either the original building or its neighbours. Inappropriate roof extensions are to be resisted where they would be over prominent, represent a discordant feature in the roofscape or destroy the integrity of cohesive building groups. More detailed advice on roof extensions is given in the Council's Revised Supplementary Planning Guidance [SPG] Consultation Draft Version, November 2000.
9. Policy EN37 requires an assessment of impact of development proposals upon the character or appearance of adjoining conservation areas, particularly where the new building would be visible therefrom. Planning Policy Guidance [PPG] Note 15 *Planning and the Historic Environment* indicates that the desirability of preserving or enhancing the character or appearance of a conservation area is a material consideration in dealing with developments situated outside but which may affect the setting or views into or out of the conservation area itself (paragraph 4.14).

#### **Main Issue**

10. The Council accepted the principle of a roof extension to the appeal premises and, in general, the design approach adopted. The variations between the previously approved schemes and the appeal proposals were also acceptable to the Council, including height and bulk, save in relation to the Warren Street elevation.
11. In view of the foregoing the main issue is the effect of the proposal upon the street scene, when viewed from Warren Street, Cleveland Street and the adjacent conservation areas. In considering this issue I shall also have regard to the difference between existing approved developments and the appeal proposals.

#### **Reasons**

12. The Council argued that the vertical extension, with only a slight set back, would provide an almost sheer elevation to Warren Street, with a long view thereof along Cleveland Street from the adjacent conservation area within the City of Westminster. The extension would not relate well to the form proportions or character of the existing building and would be

unduly prominent in terms of shape and architectural treatment. The impact would be all the greater due to the metal cladding of the plant room enclosure and additional height of the mezzanine floor. In this context the proposal would conflict with the objectives of Policies EN 1, 22 and 24 of the UDP. The additional height and coverage of the proposed extension would have a greater impact than the approved schemes on the important Warren Street/Cleveland Street corner elevation. The overall effect would be over-dominant in the street scene and in views from adjacent conservation areas, contrary to the objectives of Policy EN37 of the UDP.

13. I am unable to agree with the Council's assessment of the prospective impact of the proposal. In relation to the proposed mezzanine I note that in both the previously approved and present appeal proposals this feature would be set well back from the edge of the building on both the Cleveland Street and Warren Street Elevations. A partial and longer distance view would be possible from Cleveland Street, at some distance to the south, beyond Greenwell Street. However, I do not consider that the mezzanine would be unduly prominent or intrusive within the street scene or roofscape. In the longer distance view the mezzanine feature would be seen against the backcloth of taller buildings on the north side of Euston Road.
14. I consider that the difference between the roof extension in both the approved and proposed schemes would be minor in terms of height and bulk. The appeal proposal would bring the extension closer to the edge of the roof on both the Cleveland Street and Warren Street elevations but not to the extent that the resultant structure would be prominent, dominant or intrusive. From Warren Street, looking westwards, views of the proposed extension would be restricted by the limited angle of vision resulting from the narrowness of the street and height of buildings on the northern side thereof. From Cleveland Street again there would be views from the western side but these must be considered in the context of the existing approvals for a roof extension granted in 1997 and renewed in 2001. I do not consider that the impact would be significantly greater than in the case of the approved schemes.
15. The Council's concern with regard to contrasting metal cladding at roof level again appears to me to be a feature already accepted in the approved schemes. The appellant has indicated a willingness to accept a condition requiring prior approval of the cladding materials, as in the case of the earlier approvals. I consider that this would provide the Council with sufficient safeguards in this respect.
16. Finally, it appears to me that the impact upon the adjacent conservation areas would be little different than with the previously approved schemes. There would be no significant increase in bulk, mass or height. The views of and from the conservation areas would remain unchanged to a large degree. Accordingly, I do not consider that the proposals would adversely affect the character or appearance of the adjacent Fitzroy Square or Cleveland Street Conservation Areas.

#### **Conditions and other limitations**

17. The Council, without prejudice to its case, suggested that if the appeal were to succeed then two conditions should be imposed on the grant of permission. The first would require the submission and approval of details of facing materials. The second would specify noise limits (from roof mounted plant) in order to protect the amenities of nearby residents. The appellant accepted both conditions.

18. I consider that both conditions meet the legal and policy tests for imposition set out in Circular 11/95 *The use of conditions in planning permissions*. I shall modify the wording to follow more closely the model form set out in the Annex to Circular 11/95. I shall also impose the statutory condition relating to commencement of development.

### Conclusions

19. For the reasons given above and having regard to all other matters raised, I conclude that the appeal should be allowed. I do not consider that the appeal proposals would unacceptably conflict with the objectives of UDP Policies listed in paragraphs 7-9 above or the national guidance set out in paragraph 4.14 of PPG15.

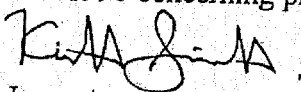
### Formal Decision

20. In exercise of the powers transferred to me, I allow the appeal and grant planning permission for the erection of roof extension (4<sup>th</sup> Floor level) incorporating a mezzanine upper floor level for office use and installation of plant at roof level at 373-375 Euston Road, London NW1 in accordance with the terms of the application Ref.PSX0105244/R1 dated 25 January 2002, and the plans submitted therewith, including agreed modifications, subject to the following conditions:

- 1) The development hereby permitted shall be begun before the expiration of five years from the date of this decision.
- 2) No development shall take place until samples of the materials to be used in the construction of the external surfaces of the extension hereby permitted have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.
- 3) Measured at a point 1m outside the windows of any neighbouring habitable room, or such other agreed measuring point, the level of noise from all plant and machinery installed shall at all times be at least 5 decibels below the existing background noise levels expressed in dB(A) at such locations. Where the noise from the plant and machinery installed is tonal in character the differences in levels shall be 10dB(A) at least.

### Information

21. A separate note is attached setting out the circumstances in which the validity of this decision may be challenged by making an application to the High Court.
22. This decision does not convey any approval or consent that may be required under any enactment, by-law, order or regulation other than section 57 of the Town and Country Planning Act 1990. An applicant for any approval required by a condition attached to this permission has a statutory right of appeal to the Secretary of State if that approval is refused or granted conditionally or if the authority fails to give notice of its decision within the prescribed period.
23. Attention is drawn to the requirements of section 76 of the Town and Country Planning Act 1990 concerning provisions for the benefit of the disabled.

  
Inspector.



DOCUMENT 4

LIST OF APPLICATION DRAWINGS

Euston Road  
Drawing List

Drawing Number	Title	Scale @ A1	Revision for Submission
A2413 001	Existing Site Location Plan	1:1250/1:2500	P15
A2413 100	Existing Site Plan	1:500	P15
A2413 101	Existing Basement and Ground Floor Plan	1:100	P15
A2413 102	Existing First and Second Floor Plans	1:100	P15
A2413 103	Existing Third and Fourth Floor Plans	1:100	P15
A2413 104	Existing Roof Plan	1:100	P15
A2413 105	Existing Sections AA and BB	1:200	P15
A2413 111	Existing North Elevation	1:200	P15
A2413 112	Existing South Elevation	1:200	P15
A2413 113	Existing West Elevation	1:200	P15
A2413 200	Proposed Site Plan	1:500	P15
A2413 210	Proposed Basement and Ground Floor Plan	1:200	P15
A2413 211	Proposed First and Second Floor Plans	1:200	P15
A2413 212	Proposed Third and Fourth Floor Plans	1:200	P15
A2413 213	Proposed Roof Plan	1:200	P15
A2413 301	Proposed Sections AA and BB	1:200	P15
A2413 401	Proposed North Elevation	1:200	P15
A2413 402	Proposed South Elevation	1:200	P15
A2413 403	Proposed West Elevation	1:200	P15
A2413 710	Planning Schedule	N/A	P15



DOCUMENT 5

CAMDEN COUNCIL PRE-APPLICATION RESPONSE DATED 19 DECEMBER 2013



Date: 19/12/2013  
Your ref:  
Our ref: 2013/5940/PRE  
Contact: Jenna Litherland  
Direct line: 020 7974 3070  
Email: Jenna.Litherland@camden.gov.uk

## **Development Management Regeneration and Planning**

Culture & environment directorate  
London Borough of Camden  
Town Hall  
Argyle Street  
London  
WC1H 8EQ

Tel: 020 7974 5613  
Fax: 020 7974 1680  
[planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Tom Vernon  
Quod  
Ingeni Building  
17 Broadwick Street  
LONDON  
W1F 0AX

Dear Tom,

### **Town and Country Planning Act 1990 (as amended) Re: Cambridge House, 373-375 Euston Road, London, NW1 3AR**

Thank you for your enquiry received on the 23 September 2013, regarding your proposal for the redevelopment of the existing site to create a part 7 storey part 5 building to provide A1-A3 floorspace at ground and lower ground floor level and 17 residential units at upper floor levels.

The proposal is detailed in the following submitted document: Pre-application Statement dated 16 September 2013; Commercial Floorspace Assessment by Quod dated September 2013; Cover letter from Tom Vernon dated 10 September 2013; Viewing Schedule by Metrus.

Amended docs: Pre-Application Review dated 29 October 2013; A2413-SK-1311\_03\_P2;

Further to our meeting on the 29 October and site visit on the 7 November I can provide you with the following advice.

#### **Site Description**

The proposal relates to an existing building located on the corner of Euston Road, Cleveland Street and Warren Street. The site comprises a 4 storey plus basement building. The ground and basement levels are used as a car showroom (Sui Generis) and the upper floors are vacant offices (B1a).

The site is located within the Central Activity Zone (CAZ) and close to the boundary with Fitzroy Square Conservation Area and the borough boundary with Westminster.

#### **Relevant Policies**

##### LDF Core Strategy

- CS1 Distribution of growth
- CS3 Other highly assessable areas
- CS5 Managing the impact of growth and development
- CS6 Providing quality homes
- CS8 Promoting a successful and inclusive Camden economy



CS10 Supporting community facilities and services  
CS11 Promoting Sustainable and efficient travel  
CS13 Tackling climate change through promoting higher environmental standards  
CS14 Promoting high Quality Places and Conserving Our Heritage  
CS15 Protecting and Improving our Parks and Open Spaces & encouraging Biodiversity  
CS16 Improving Camden's health and well-being  
CS18 Dealing with waste and encouraging recycling  
CS19 Delivering and monitoring the Core Strategy

#### LDF Development Policies

DP2 Making full use of Camden's capacity for housing  
DP3 Contributions to the supply of Affordable Housing  
DP5 Homes of different sizes  
DP6 Lifetimes Homes and Wheelchair Housing  
DP13 Employment premises and sites  
DP15 Community and Leisure Uses  
DP16 The transport implications of development  
DP17 Walking, Cycling and public transport  
DP18 Parking standards and limiting the availability of car parking  
DP19 Managing the impact of parking  
DP20 Movement of Goods and Materials  
DP21 Development Connecting to the Highway Network  
DP22 Promoting Sustainable Design and Construction  
DP23 Water  
DP24 Securing High Quality Design  
DP25 Conserving Camden's Heritage  
DP26 Managing the impact of development on occupiers and neighbours  
DP27 Basements and Lightwells  
DP28 Noise and Vibration  
DP31 Provision of, and improvements to, open space and outdoor sport and recreation facilities  
DP32 Air quality and Camden's Clear Zone

#### Updated Camden Planning Guidance 2011 (updated 2013)

*CPG1 – Design*  
*CGP2 – Housing*  
*CPG3 – Sustainability*  
*CPG4 – Basements*  
*CPG5 – Town Centres, Retail and Employment*  
*CPG6 - Amenity*  
*CPG7 – Transport*  
*CPG8 – Planning Obligations*

#### **Fitzrovia Area Action Plan – Proposed Submission December 2012**

*In line with paragraph 216 of the NPPF and due to the fact its content has been through a hearing, the Council can give this plan a considerable amount of weight when determining applications.*

#### **Considerations**

During our meeting we discussed the following matters which are considered to be material considerations:

- Land use (employment floorspace, housing, creation of A1-A3/B1);
- Design;

- Quality of residential;
- Amenity;
- Transport;
- Basement;
- Sustainability;
- CIL;
- S106 contributions.

I will now provide my comments in relation to the above considerations.

## **Land Use**

### Employment floorspace

At present the site provides 724 sqm of employment floorspace (B1a office) and 417 sqm of car showroom retail space (Sui Generis). The proposal would provide 308 sqm of commercial floorspace (A1-A3 or B1) and 17 residential units above.

Policy CS8 (Promoting a Successful and Inclusive Camden Economy) seeks to ensure that the borough retains a strong economy. It seeks to do this by, amongst other things, safeguarding existing employment sites that meet the needs of modern industry and employers and provide facilities for small and medium sized enterprises.

Policy DP13 provides more detailed information as to how these aims will be implemented. It states that the Council will retain land and buildings that are suitable for continued business use and resist a change to non-business use unless it can be demonstrated that the site or building is no longer suitable for its existing business use and that there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.

In assessing whether there is potential for a business use to continue the Council will consider the points raised in paragraph 13.3 of Policy DP13 and paragraph 6.4 of CPG5, as below:

#### paragraph 13.3 of Policy DP13

- *is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;*
- *is in a location suitable for a mix of uses including light industry and local distribution warehousing;*
- *is easily accessible to the Transport for London Road Network and/or London Distributor Roads;*
- *is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;*
- *has adequate on-site vehicle space for servicing;*
- *is well related to nearby land uses;*
- *is in a reasonable condition to allow the use to continue;*
- *is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards;*
- *provides a range of unit sizes, particularly those suitable for small businesses (under 100sqm).*

#### paragraph 6.4 of CPG5

- *the age of the premises. Some older premise may be more suitable to conversation;*

- *whether the premises includes features required by tenants seeking modern office accommodation;*
- *the quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion;*
- *whether there are existing tenants in the building, and whether these tenants intend to relocate;*
- *the location of the premises and evidence of demand for office space in this location; and*
- *whether the premises currently provide accommodation for small and medium businesses.*

The pre-application documentation includes a Commercial Assessment which assesses the proposal in relation to the points in paragraph 13.3 of DP13, however it does not specifically address paragraph 6.4 of CPG5. This should be fully addressed in any future planning application submission.

CPG5 states that where it would be difficult to make an assessment using the criteria set out above marketing evidence may also be required.

I expressed concern during the meeting that the proposal would result in the loss of 416sqm of B1 floorspace.

In terms of the quality of the existing accommodation it is acknowledged that a level of works is required to make the office space attractive to prospective tenants. This includes repairs works to the lift, noise installation of the windows, and a cosmetic face-lift. However it is not of such poor quality that the Council would accept its loss without evidence that the possibility of using the space for other business uses has been fully explored over an appropriate period of time.

You have provided marketing evidence which confirms that the site has been marketed from October 2011 but was only vacated in October 2012. However, additional marketing evidence has been found which suggests that the office space only became vacant in June 2013.

In your submission you should provide a clear chronology of the use of the premises and all marketing that has been undertaken, this should all be backed up with evidence.

You have provided a viewing schedule with comments made by prospective tenants which covers the period of August 2012 until October 2013. However, it is not clear if any interest was shown by prospective occupiers from October 2011 to August 2012 when Mace were still occupying the space. You will need to provide evidence of marketing and a viewing schedule for this time period as well including any offers received.

Many of the comments made by prospective tenants are that the office is in the wrong location or is not large enough. They would have had information on the location and size of the office in advance of any viewing, as such it is not clear why they viewed the accommodation in the first place. Further information on this would be helpful.

Principle 4 of the Fitzrovia Area Action Plan states that the Council will support Small and Medium term Enterprises (SMEs) by ensuring that existing business premises suitable for SME use are retained. The basis for this is that the multitude of SME's are a valued part of the areas character and premises that can provide lettings of less than 100sqm should be retained for their use. 60% of jobs in the Fitzrovia area are SME's, with under 200 employees.

Each floor of the building is around 241sqm and if each floor was let individually this quality and size of floor space, despite its constraints, may well be attractive to a SMEs who often seek second hand office accommodation in this location. As such, in order to support a proposal for loss of employment floorspace at this site evidence that the space has been marketed flexibly giving the option of taking the floorspace floor by floor or as a whole would be required.

You should also fully explore sub-dividing the space and marketing it to smaller businesses and start-ups. Including options of appointing a managing agent to undertake the management of the smaller workspaces, if appropriate. If it is found that the space would be suitable for SMEs the Council would resist it loss.

Evidence that the space has been marketing in this was should be submitted with the application. If you do not have robust marketing evidence which meets the above requirements it is suggested that you undertake a further period of marketing prior to submitting an application.

All marketing evidence should be submitted with any future application and shall conform to the marketing requirement in CPG5.

### Summary

Based on the level of information currently provided officers cannot accept the loss of office floor space. However, this position may change if the additional marketing evidence requested above were to be robust enough and sufficient to demonstrate that there is no demand for the employment floorspace.

I have attached to this letter a recent appeal decision in the Fitzrovia Area which demonstrates the importance of providing robust marketing evidence.

### Loss of the car showroom

There is no policy which specifically protects this type of use. As the use provides employment opportunities it would be beneficial for the replacement use to also provide employment. The creation of A1-A3 or B1 floorspace would provide employment opportunities as such this is considered to be an appropriate replacement use.

### Creation of A1-A3 or B1 use at ground floor and basement level

Policy DP10 states that the Council will encourage the provision of small shop premises suitable for small and independent businesses by amongst other things expecting large retail developments to include a proportion of smaller units.

Principle 4 of the Fitzrovia Area Action Plan states that the Council will guide proposals for larger A1 shops (over 100 sqm) sequentially to the Tottenham Court Road Central London Frontage and then the Goodge Street Neighbourhood Centre. It states that the Council will support the development of small A1 shops (generally under 100 sqm) in Fitzrovia provided that they contribute to the character, function or vitality of the area and do not harm the amenity of neighbours.

The proposal would result in one unit with a total floorarea of 308 sqm. The preference would be for this unit to provide employment floorspace (B1a) to help compensate for the loss of employment floorspace at upper floor levels.

In this instance, given that the existing use is essentially retail and the precise location of the site on Euston Road, the creation of a retail or restaurant unit of this size is unlikely to be objectionable. However, if the proposed use is to be a restaurant, kitchen ventilation should be integral to the design of the building. The addition of external flues would not be permitted. Hours of operations may also be conditioned to ensure the use would not impact on the amenity of neighbours.

### Housing

Housing is a property land use of the LDF and the principle of providing residential units at this site is considered acceptable providing you first fully justify the loss of the existing employment floorspace against policy DP13.. You proposed to create 17 residential units comprises 9 x 1 beds (53%), 5 x 2 beds (29%), 3 x 3 beds (18%).

### Mix

Policy DP5 seeks to provide a range of unit sizes to meet demand across the borough. In order to define what kind of mix should be provided within residential schemes, Policy DP5 includes a Dwelling Size Priority Table. The Council would expect any housing scheme to meet the priorities outlined in the table, or provide robust justification (such as RP requirements) for not providing a mix in line with the table and the requirements outlined in paragraph 5.5 of the supporting text to the policy.

At present the mix is not considered to be appropriate as the proposal provides too many 1 bed units for which there is lower demand. The proposal should contain a 40% two bed units and greater number of family units.

### Affordable Housing

Policy DP3 expects all developments with a capacity to provide 10 units or more to make a contribution to affordable housing. DP3 introduces a sliding scale for developments between 10 units and 50 units.

The 50% target will operate on a sliding scale for housing developments, subject to the financial viability of the development, with a norm of 10% for 1,000 sq m (gross) of additional housing and 50% for 5,000 sq m (gross) of additional housing, considered to be sites with capacity of 10 dwellings and 50 dwellings respectively.

Your scheme provides 1,228 sqm of residential floorspace as such a 12% contribution towards affordable housing would be required. In line with the requirements of the policy, the provision of affordable housing will be expected on site, but where this cannot be practically achieved on the site we may accept off site affordable housing or exceptionally a payment in –lieu.

In this instance you have demonstrated that it would not be practical to provide affordable housing on site. The proposed building has one core which is likely to be unattractive to RSLs looking to take on one or two units within the development as services charges would apply. You have, at my request, explored the option of creating units to the rear of the building with its own access off the street. However, this would not provide good quality residential floorspace as the unit would face directly onto the street and would have no defensible space.

The applicant has advised that they do not have any other sites within the vicinity of the application site which could accommodate affordable housing units. As such, in this instance it is likely that officers may support a financial contribution, however be aware that Members strongly encourage affordable housing on site particularly in the Central London Area. You are advised to provide a supporting statement and details of discussions with RPs and confirmation that they would not be willing to take on floorspace within the building. Details for calculating the affordable housing contribution are contained with CPG3 and CPG8.

An open book financial viability appraisal, which shall be independently assessed at the applicant's cost, would be required should a less than 12% provision be provided by the applicant. A deferred payment obligation would be secured in the S106 for re-appraisal of the development at a later date.

#### Lifetime Homes and Wheelchair Housing

All units should meet lifetimes homes standards. This should be demonstrated in the submission by way of a Lifetimes Homes Assessment. 10% of the homes should either meet wheelchair housing standard or be easily adaptable to meet the standards.

#### **Design**

The main issues to consider are substantial demolition of the existing buildings and the height, bulk and design of the redevelopment.

#### Demolition

The application site is not located within a Conservation Area or the Local List. As such, its demolition does not require planning permission. The Council does not object to the building being demolished.

#### Bulk, height and design

The Conservation Officer is satisfied with the general design and scale of the proposed building on the corner of Cleveland Street and Warren Street. The design will complement the surrounding area and will respect the height of neighbouring properties.

Concern is raised by the height of the proposed frontage building on Euston Road which is considered excessive in terms of height, bulk and scale particularly when seen in the context of the street scape on this side of the Euston Road. The proposed height will also have some impact on the long views of the Listed BT Tower which is clearly visible from this part of the Euston Road. As such, it is suggested that the proposal is amended by reducing the height of the building.

#### Detailed design and material

The material proposed is a pink/red sandstone. This material is considered to appear out of keeping with the more traditional materials in the locality of the application site. It is suggested that you use a more traditional pallet which would better relate to the surrounding building materials.

The ground floor window opening to the retail units on Cleveland Street is considered to be excessively wide and does not relate to the fenestration at upper levels, it is suggested that this window is intersected with a vertical solid pier to help ground the building and the better integrate the design.

## **Trees and Biodiversity**

Policy CS15 states that the Council will require development to protect existing trees and promote the provision of new trees and vegetation and encourages biodiversity.

### Trees

There is a street tree on Euston Road which may be affected by the proposals. The building should be designed so as not to impact on this street tree. A BS:5837 2012 report (Trees in relation to design, demolition and construction) will be required.

### Biodiversity

Any new development should incorporate biodiversity enhancing measures such as biodiverse roofs, green walls, bird and bat bricks in line with planning policy and guidance. A proposed roof plan has not been submitted with the pre-application documentation. You are advised the main roof of the building should be a green or brown roof. You are also advised to incorporate bird boxes into the design of the building, specifically swift bricks on the north elevation of the building.

## **Quality of residential**

All flats should be considered against the standards outlined within the Mayor's London Housing SPG 2012. The proposed units would be accessed by a separate entrance on Warren Street. The flats would be accessed by both a staircase and a lift. This is welcomed as it enabled the units to be accessible to all. 10 of the 17 units would be dual aspect and the remaining 7 units would be single aspect. The Council's minimum residential requirements state that each unit should have a window facing 30 degrees of south in order to make the most of solar gain through passive solar energy. This would be achieved for the single aspect units.

The units to the front of the building would face directly onto Euston Road. These units would be dual aspect, however the windows on the side elevation would also be located very close to Euston Road. Euston Road is a major thoroughfare through London which has heavy traffic which emits high noise volumes 24 hours a day. You have advised that the new building and windows would be designed on to attenuate this noise. However, in the front flats even if this noise is attenuated it would not be possible to open windows to allow natural ventilation. This is disappointing and would result in the resident accommodation towards the front of the building being poor quality. It is suggested that you explore an alternative layout to improve the residential quality of the units.

All habitable rooms should have access to natural light. A number of the 1 bed units to the rear would have kitchens which do not have access to natural daylight. In accordance with the BRE standards kitchens should have an Average Daylight Factor (ADF) of no less than 2%. The layout should be amended so that all habitable rooms have daylight levels which comply with BRE guidelines.

All units would meet or exceed the Mayor's space standards in terms of overall floor areas. All 1<sup>st</sup> and double bedrooms should have a minimum area of 11sqm and single rooms should have a minimum floorarea of 6.5sqm. All bedrooms on the originally proposed scheme seem to comply with this. I have not been provided with scaled plans for the proposed amended layout set out in Pre-Application Review dated 29 October 2013, however it does appear that the bedroom of the single aspect units to

the rear of the building at 1<sup>st</sup> to 3<sup>rd</sup> floor level may fall slightly below this minimum standard. This should be checked and amended if necessary.

The site's location next to a busy road will necessitate the submission of Noise and Air Quality assessments with any future application in accordance with policies DP26, DP28 and DP32.

#### Amenity space

Access to private amenity in the form of roof gardens or balconies is welcomed especially for the family sized units. However, balconies facing Euston Road would not be encouraged as they would not provide good quality outdoor amenity space.

#### **Neighbouring amenity**

Policy DP26 states that development should protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity in terms of privacy and overlooking, overshadowing and outlook, sunlight and daylight, noise and vibration, odour, fumes and dust and microclimate.

#### Daylight

The closest neighbouring residential units are located at No. 175 Cleveland Street opposite the application site. You have submitted daylight information which suggests that the proposed development would impact on daylight to the kitchen/dining room of the first floor level 2 bedroom flat. This room currently has an Average Daylight Factor (ADF) of 2.28 as a result of the proposal this would be reduced to 1.95.

In accordance with the BRE guideline 'Site Layout Planning for Daylight and Sunlight – a guide to good practice' the initial test for assessing whether a proposed development impacts on daylight to an existing building is whether Vertical Sky Component would be reduced to less than 27% and less than 0.8 times its former value.

In order to fully assess impact on this property I would need you to undertake a VSC test as well as ADF. If the proposal results in a VSC being reduced by less than 27% or less than 0.8 times its former value if less than 27% to begin with the proposal is likely to have significant impact on neighbour amenity and may result in officers not being able to support the proposal.

A full daylight and sunlight study should be provided with any future application.

#### Privacy and overlooking

There may be a level overlooking between the proposed units and the residential units at No. 175 Cleveland Street however, given the distance of the 12 metres between the properties and that this is a typical arrangement having buildings in residential use on either side of the highway with windows facing each other this is accepted as providing an appropriate level of privacy.

#### Noise

Details of any plant proposed as part of the development should be included in the application. An Acoustic Report will be required to assess the impact of any plant on the nearest noise sensitive window. Noise levels must comply with the Council's noise standards set out in policy DP28.

#### **Transport**



The site has a PTAL value of 6b meaning that access to public transport is considered to be excellent. There is a Controlled Parking Zone surrounding the site.

### Car Parking

The original proposal included parking for the residential units in the basement and I advised you in the meeting that this would not be acceptable. As such, you have amended the proposal to remove the car lift and basement level parking (as shown on plan A2413-SK-1311-03-P2). This change is welcomed.

The units would also be secured as car-free through a S106 agreement; this is in accordance with policy DP18 and the London Plan 2011. This would mean the further occupiers of the units would not be eligible for on street parking permits.

### Cycling

Camden's Parking Standards for cycles states that 1 space is required per 250sqm over a threshold of 500sqm of retail and commercial floorspace. 308sqm of retail/commercial floorspace is proposed as such the threshold for requiring cycle parking would not be reached.

From a residential perspective we would use TfL's Parking standards that stipulate that a minimum of one space is required for dwellings up to 2 bedrooms. For units with 3 or more bedrooms the standards require the provision of 2 spaces per unit. The proposal suggests providing 14 cycle storage spaces at basement level. This does not meet the required number of cycle parking spaces. In total based on the current mix 20 spaces are required.

*As outlined in CPG7, 'cycle parking needs to be accessible (in that everyone that uses a bike can easily store and remove a bike from the cycle parking) and secure. The route from cycle parking to street level should be step free. Cycle parking inside buildings should be at the entrance level of the building or accessible by a ramp or lift from street level that can accommodate a bike'. It is noted that a lift is being proposed to take cycles down a level to the basement where cycle storage is proposed. You should demonstrate in any application that all other avenues to host the cycle provision at ground floor level have been exhausted.*

### Development connecting to the highway, financial contribution

The Council would be likely to secure a S106 financial contribution for resurfacing the footway adjacent to the site. This would mitigate any harm caused to this part of the site during the construction stage and tie the development into the surrounding streetscape.

### Pedestrian, Cycling and Environment financial contribution

The Council would be likely to secure a Section 106 financial contribution to mitigate against the impact of the increased number of people using the facilities and services in the area as a result of the increase in residential units. This contribution is likely to be in the region of £2k per residential unit and therefore £34k for the development as a whole.

### Construction Management Plan (CMP)

DP21 seeks to protect the safety and operation of the highway network. For some development this may require control over how the development is implemented

(including demolition and construction) through a Construction Management Plan (CMP) secured via S106. Given the level of demolition and construction a CMP would be required. Please see Chapter 8 of CPG6 for more details on the requirement for a CMP.

## **Basements**

Existing and proposed sections have not been provided therefore it is not possible to establish whether any excavation is proposed, if you are proposing any excavation you should consider the following.

Policy DP27 states that developers will be required to demonstrate with methodologies appropriate to the site that schemes maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and run-off or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area.

If you are proposing excavation you are required to submit a Basement Impact Assessment which satisfactorily demonstrates that the proposal would maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and run-off or cause other damage to the water environment; and avoid cumulative impacts upon the structural stability or water environment in the local area. Detail on preparing a Basement Impact Assessment is contained within CPG4 – Basements and lightwell.

## **Sustainability**

Policy DP22 (Promoting sustainable design and construction) states that the Council will require development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. As of 1 October 2013 new developments are expected to achieve a 40% reduction in carbon when compared to Building Regs 2010 (see London Plan policy 5.2).

Energy efficient design requires an integrated approach to solar gain, access to daylight, insulation, thermal materials, ventilation, heating and control systems. These should be considered in relation to each other when designing a scheme.

An energy statement should be submitted with an application of this nature which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy. CPG3 - Sustainability provides guidance on what should be included in an energy statement. For a development of this size the Council would expect the applicant to explore the opportunity of linking up to an existing or future decentralised energy network. Further details can be found in CPG3- Sustainability.

The new residential units would be required to meet as a minimum 'Code Level 4' in a Code for Sustainable Homes Assessment and the new commercial floorspace would be expected to meet 'very good' in a BREEAM Assessment. An assessment should be submitted as part of any application submission, with a post construction review to be carried out as a condition/legal agreement of any approval.

## ***Water run-off and attenuation***

Although this may be included in any CfSH assessment, the applicants should make provision for water run-off attenuation measures and should ensure green roofs, brown roofs and green walls are proposed where possible.

### **Community Infrastructure Levy**

The development would be subject to the Mayor of London's Crossrail CIL at £50 per sqm of new floorspace (net uplift).

Please be aware that Camden CIL would be adopted by this any application on this site is considered at committee. The preliminary draft charging schedule, out for consultation, can be found here <https://consultations.wearecamden.org/culture-environment/camden-cil-preliminary>

### **S106 Contributions**

#### Local community benefits (CS19)

Any residential development will lead to increased pressure on the existing local community facilities within the area, such as the open space, schools, health and leisure uses. As such it is crucial that the development at the very least contributes towards supporting, improving and enhancing existing facilities.

#### **Likely s106 terms (subject to change if Camden CIL adopted)**

- Car free
- Affordable housing financial contribution
- Public Open Space contributions
- Education contributions
- Social and community facilities contributions
- Construction / Servicing Management Plans
- Code for Sustainable Homes 'level 4' minimum
- Energy Statement
- Environmental improvements / public realm contribution
- Highways contribution
- Construction Workers Training and Recruitment Package

You are advised to enter into a Planning Performance Agreement, the details of which can be agreed with officers. Your early consultation with the surrounding conservation area CAACs, local residents and any other local amenity groups, is recommended.

This response represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your emerging proposals will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Yours sincerely,

Jenna Litherland

Senior Planning Officer  
Development Management



DOCUMENT 6

MERJS VIEWING SCHEDULE, CAMBRIDGE HOUSE – OCTOBER 2011 TO AUGUST 2012

**SCHEDULE OF INSPECTIONS  
CAMBRIDGE HOUSE  
373-375 EUSTON ROAD  
LONDON NW1 3AR**

<b>DATE OF INSPECTION</b>	<b>REQUIREMENT (SQ FT)</b>	<b>COMMENTS</b>
10/08/12	3,000 sq ft MAX	Floor plates didn't match their requirement.
02/08/12	1,000 – 4,000 sq ft	Offices weren't suitable for their company.
25/07/12	2,000 – 3,000 sq ft	Ruled out due to changing their requirement.
12/07/12	2,000 – 3,000 sq ft	Ruled out due to the location of the offices.

DATE OF INSPECTION	REQUIREMENT (SQ FT)	COMMENTS
28/06/12	1,000 – 5,000 sq ft	Condition of the space not good enough for them.
19/06/12	Approx 2,500 sq ft	Floors not suitable for them.
13/06/12	2,000 – 4,000 sq ft	Wanted to be closer to Oxford Circus.
07/06/12	Up to 3,000 sq ft	Floor plates not suitable for their requirement.
31/05/12	Up to 3,000 sq ft	Undisclosed party. Initial round of viewings. The space did not suit their needs.

DATE OF INSPECTION	REQUIREMENT (SQ FT)	COMMENTS
23/05/12	Up to 2,000 sq ft	The space did not suit their needs. Looking for better quality space.
07/05/2012	Up to 1,500 sq ft	Has requested a second viewing in the next couple of weeks
27/04/2012	Up to 1,500 sq ft	Space too large for their needs
17/04/2012	Approx 3,000 sq ft	The space was not suitable for their requirement.
04/04/2012	Up to 3,000 sq ft	The space did not suit their needs.
29/03/2012	2000 sq ft	The space was not suitable for their requirement.

DATE OF INSPECTION	REQUIREMENT (SQ FT)	COMMENTS
21/03/2012	Up to 3,000 sq ft	Too small
14/03/2012	2,500 sq ft	The space wasn't suitable for their requirement
06/03/2012	Up to 1,350 sq ft	Too large
22/02/2012	Up to 3,000 sq ft	Showed the party floors 4 and 5 but wouldn't suit their business
08/02/2012	Circa 2,000 sq ft	Waiting to hear feedback
02/02/2012	3,000 sq ft	Wanted space in shell and core condition. Configuration does not match expectations.
19/01/2012	1,500 sq ft	Awaiting feedback



DATE OF INSPECTION	REQUIREMENT (SQ FT)	COMMENTS
06/01/2012	2,000 sq ft	Too big
03/01/2012	2,000 sq ft	Too expensive
22/12/2011	1,500 sq ft	Didn't like the fit out and too expensive
16/12/2011	1,500 – 2,000 sq ft	Waiting to hear feedback
12/12/2011	1,600 sq ft	Out of their budget and too big.
07/12/2011	3,000 sq ft	Discount as wanted office on one floor
01/12/2011	2,500 sq ft	The space did not suit their needs.

DATE OF INSPECTION	REQUIREMENT (SQ FT)	COMMENTS
30/11/2011	2,250 sq ft	More than their budget permitted
22/11/2011	1,500 sq ft	Preference for ground floor and too big.
16/11/2011	2,000 sq ft	Space was too small
09/11/2011	2,500 sq ft	Wanted open plan space on one floor and better specifications and amenities.
02/11/2011	2,200 sq ft	Waiting to hear, however, initial feedback suggested it was too expensive
28/10/2011	2,000 sq ft	Wanted one floor
25/10/2011	2,000 sq ft	Too expensive compared to other options

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DATE OF INSPECTION	REQUIREMENT (SQ FT)	COMMENTS
17/10/2011	1,800 – 2,000 sq ft	Waiting to hear