

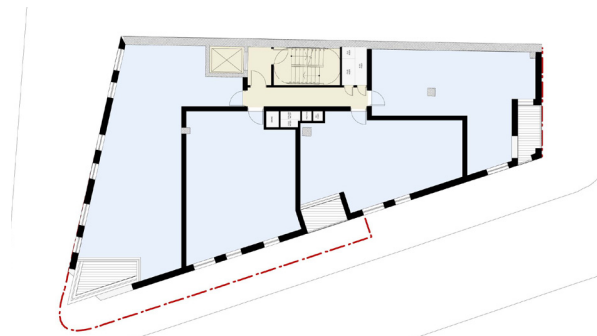
4.3.2 Housing

Comments

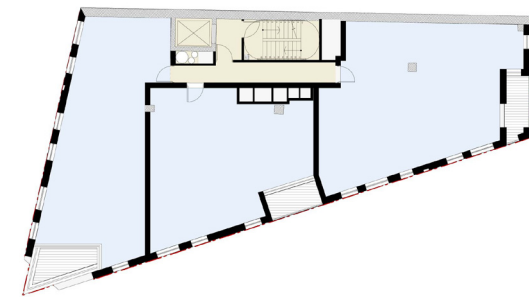
'Mix - At present the mix is not considered to be appropriate as the proposal provides too many 1 bed units for which there is lower demand. The proposal should contain a 40% two bed units and greater number of family units.'

Response

Following the pre-application response we have increased the number of 2 bedroom units by providing three units on the third floor rather than four units. This has led to a revised total of 16 units with 6no 1 bedroom units (38%), 7no 2 bedroom units (44%) and 3no 3 bedroom units (19%) which meets the requirement identified within the pre-application response.



Pre-Application - Third Floor



Planning Application - Third Floor

'Affordable Housing - 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.

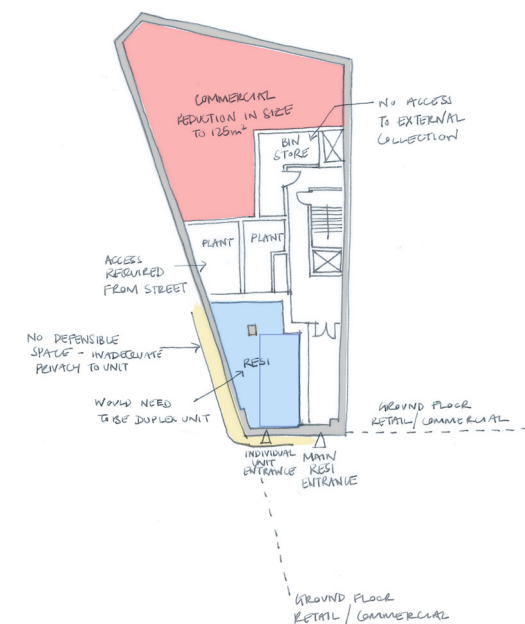
In this instance you have demonstrated that it would not be practical to provide affordable housing on site. The proposed building has one core which is likely to be unattractive to RSLs looking to take on one or two units within the development as services charges would apply. You have, at my request, 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.

The adjacent sketch illustrates some of the limitations associated with delivering residential at ground floor, and highlights the following design constraints:

- No defensible space along street level - It is therefore difficult to provide usable residential space at ground floor because there is no way of ensuring the privacy of a unit provided here. Security is also a potential issue.
- Insufficient space for a unit - Only c.35m<sup>2</sup> of residential space could be provided at this level so it is not possible to accommodate a unit in line with the London Housing Design Guide recommended areas in this location. In considering a duplex in this location, the privacy issues outlined above would result in a very inefficient use of space and an inability to comply with design standards.
- Out of context with the local area - To the east along Warren Street and to the south along Cleveland Street all of the ground floor units provide either commercial or retail use. The only ground floor residential use is provided within the housing block on the opposite side of Cleveland Street to the south which is set significantly back from the street and protected by a plant border. Residential accommodation at this level is not in keeping with the neighbouring properties.
- Reduction in size of commercial floorspace
- Servicing difficulties - The bin store has to be located away from the external façade to be most efficient in an arrangement that includes residential space at ground floor, which means that there is no access for collection directly from the store. If it is located against the external wall, the commercial space reduces further again, also the retail street frontage reduces even further. This would result in a less desirable and less viable commercial space.
- An affordable housing unit would need its own bin store and cycle store, for which it would need to fund the service charge of its own accord
- Saleability to a Registered Provider - Affordable rented units that would require their own servicing solution would not be an attractive product for a Registered Provider (RP) to purchase, would have long term cost implications on management and maintenance for the RP, would be likely to have a low transfer value because of its position and compromised design and therefore would not achieve good value for money provision for the Council'

For further information please refer to the Affordable Housing Statement.



'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.'

Please refer to the Lifetime Homes Assessment within the appendix of this document for further information. 10% of the units will be wheelchair adaptable in accordance with policy, please refer to the Wheelchair Housing Assessment appendix.

4.3.3 Design

Comments

‘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.’

Response

**Reduction in height**  
Following our initial submission we reduced the height of the top storey by relocating the plant and reducing the parapet. This led to the height of the building becoming the same height as 365 Euston Road at the other end of the street block.

**Set back roof**  
In addition the top floor was set in, to reduce the height when viewed from the street. In order to provide a more subservient appearance to the upper floor, the material appearance and treatment was altered to appear different from the feature corner winter gardens.

**Separation between winter gardens and roof massing**  
The top floor increased the glazing and the metal finish has been shown as a light grey treatment in contrast to the dark grey powdered aluminium winter gardens. The intention was to futher recess the roof by providing a visual separation between the winter garden and the roof element.

We have carried out townscape studies, please refer to section 3.5.1, and modelled the proposed in 3D to ensure the proposed development does not impact detrimentally on the views, in particular in reference to the listed BT Tower. Please refer to section 5.4 for further information.



Revised height of top storey for Pre-Application Meeting



Change in material of top storey following Pre-Application Meeting

In order to ensure we do not impinge on the views of the BT Tower from Euston Road, we have carried out a series of studies of the views towards the tower with the existing massing and the proposed massing as a comparison. Please refer to section 5.5 Appearance for further information.



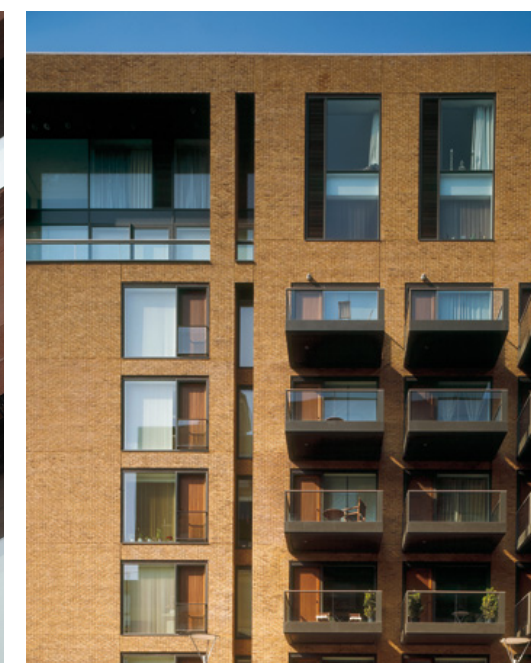
'Detailed design and material - The material proposed is a pink/red sandstone. This material is considered to appear out of keeping with the more traditional materials in the locality of the application site. It is suggested that you use a more traditional pallet which would better relate to the surrounding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

Our initial proposals provided a red sandstone to the facade of the northern block, to provide a more contemporary interpretation of the red brick utilised on 365 Euston Road.

However following consultation with LBC we have decided to provide a more traditional material providing a red brick facade in keeping with 365 Euston Road.



Red Sandstone



Traditional brick

'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.'

Additional brick piers have been carried to the ground to provide smaller shop fronts with better integration to the fenestration above. In addition this provides a more sensitive relationship to the existing retail units further along Cleveland Street which provide smaller, individual commercial units. The fenestration at ground floor along Euston Road has also been reduced to ground the upper floors and provide a more evolved design.



Euston Road Elevation



Cleveland Street Elevation

'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.'

We have designed the proposal so as to minimise impact on the existing street tree. We have not extended the existing basement structure and we are not extending the building beyond the existing building facade on the elevation adjacent to the street tree. We have also undertaken a tree survey and BS:5837 2012 report which has been submitted in support of the application.



Comments

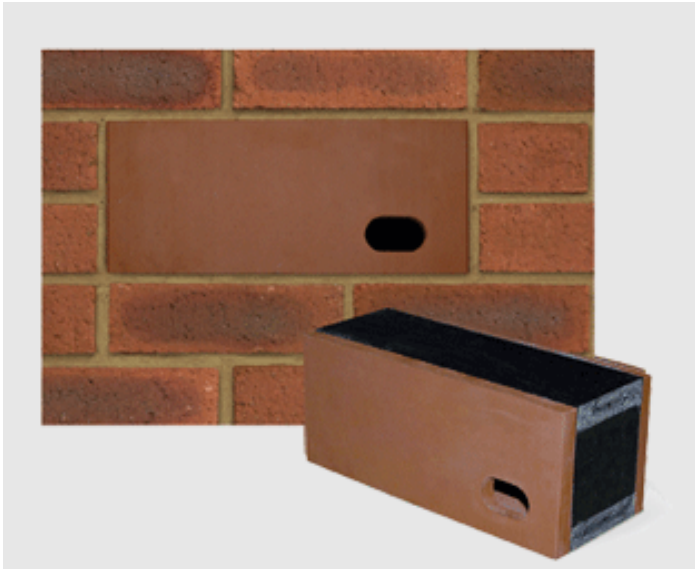
‘Any new development should incorporate biodiversity enhancing measures such as biodiverse roofs, green walls, bird and bat bricks in line with planning policy and guidance. A proposed roof plan has not been submitted with the pre-application documentation. You are advised the main roof of the building 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.’

Response

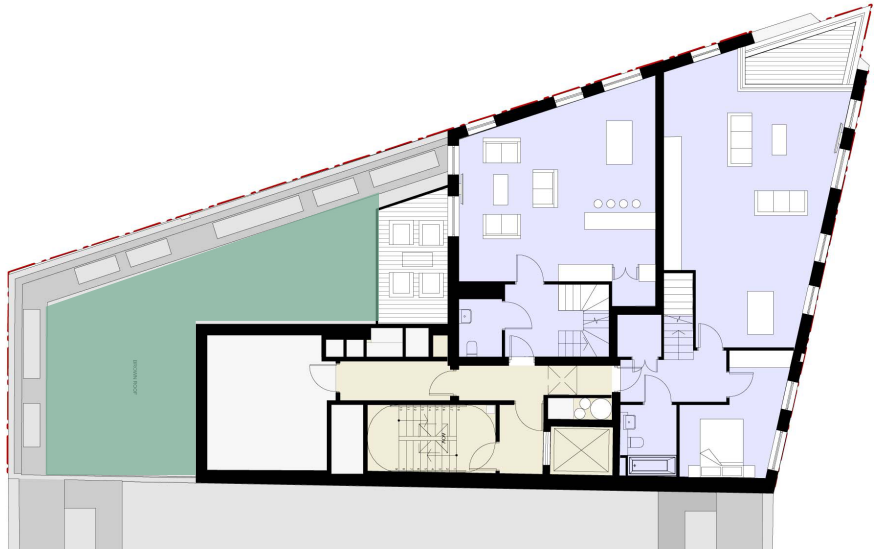
Following feedback from LBC we have incorporated a brown roof into the fifth floor roof. The brown roof is to be a lightweight extensive roof to create habitats by providing an environment that can be colonised naturally.

In addition we have included ‘swift bricks’ into the recess within the facade of the northern and western elevations. This allows the bird boxes to be integrated seamlessly into the design of the building while providing shelter for the birds using them.

In accordance with Camden guidance, the Swift boxes are sited on a north, north west or west aspect out of the sun and heat which can harm the chicks. They will be installed at a height of at least 6 to 7m, within the shelter of the recesses. A 5 metre drop, clear of obstructions provides clear airspace for high speed entry and egress. As we will provide several boxes together, this should assist the formation of swift colonies.



Example of a swift brick



Fifth floor plan with brown roof identified



North Elevation with Swift Bricks identified



West Elevation with Swift Bricks identified



#### 4.3.4 Quality of residential

##### Comments

'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.'

##### Response

All units have been designed to meet Mayor's London Housing SPG 2012 standards where feasible within the restrictions of the existing building. All units have a window facing at least 30 degrees south and only 4 of the 16 units are single aspect units. Please refer to the appendix referring to the Mayor's London Housing Assessment for further information.

The noise levels and air quality levels along Euston Road and Cleveland Street require all units within the building to be mechanically ventilated through the use of whole house ventilation. However they have been designed with an acoustic consultant and air quality consultant to ensure all units have a good quality of residential accommodation. Please refer to the Acoustic Report and the Air Quality Assessment submitted in support of the application for further information.

In addition we have reviewed other residential accommodation within the area with mechanical ventilation to ensure residential accommodation designed in this way would be successful within the area.

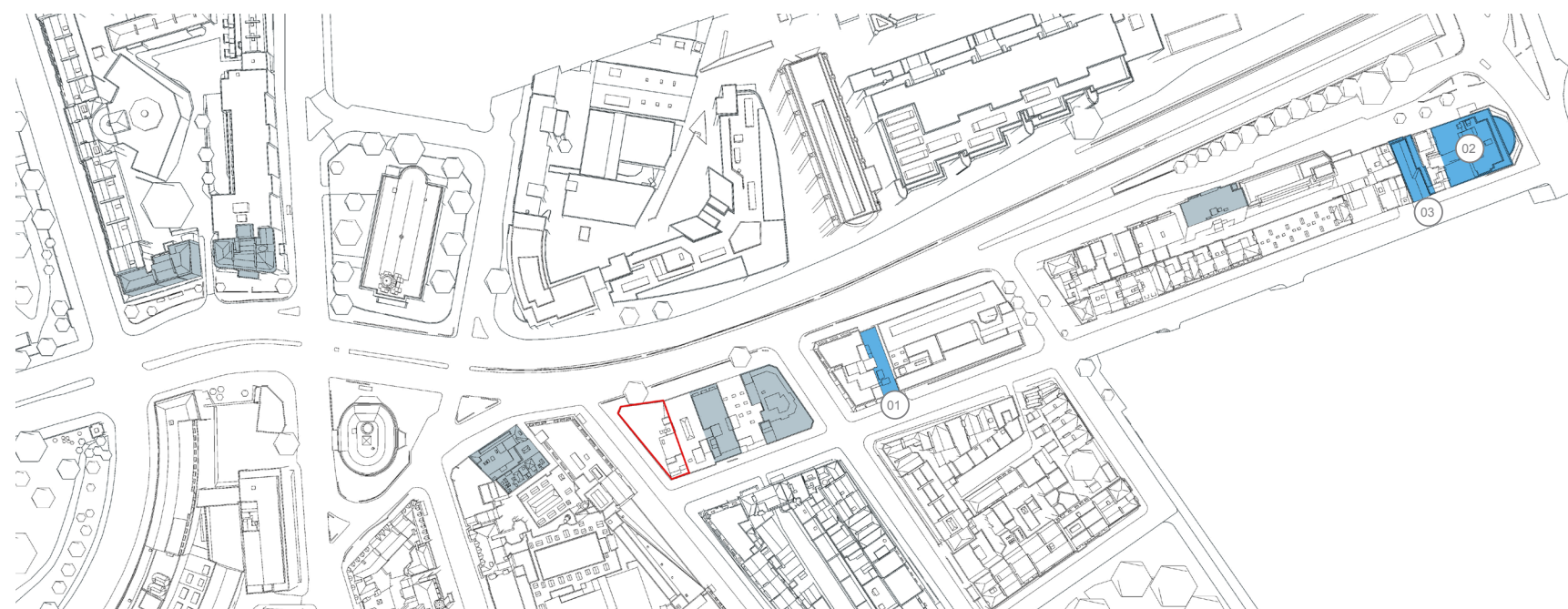
Residential use along Euston Road

Recently approved residential planning applications

01 No.375 Euston Road Planning Application number 2012/4512/P

02 Warren Court, Euston Road Planning Application number 2011/0651/P

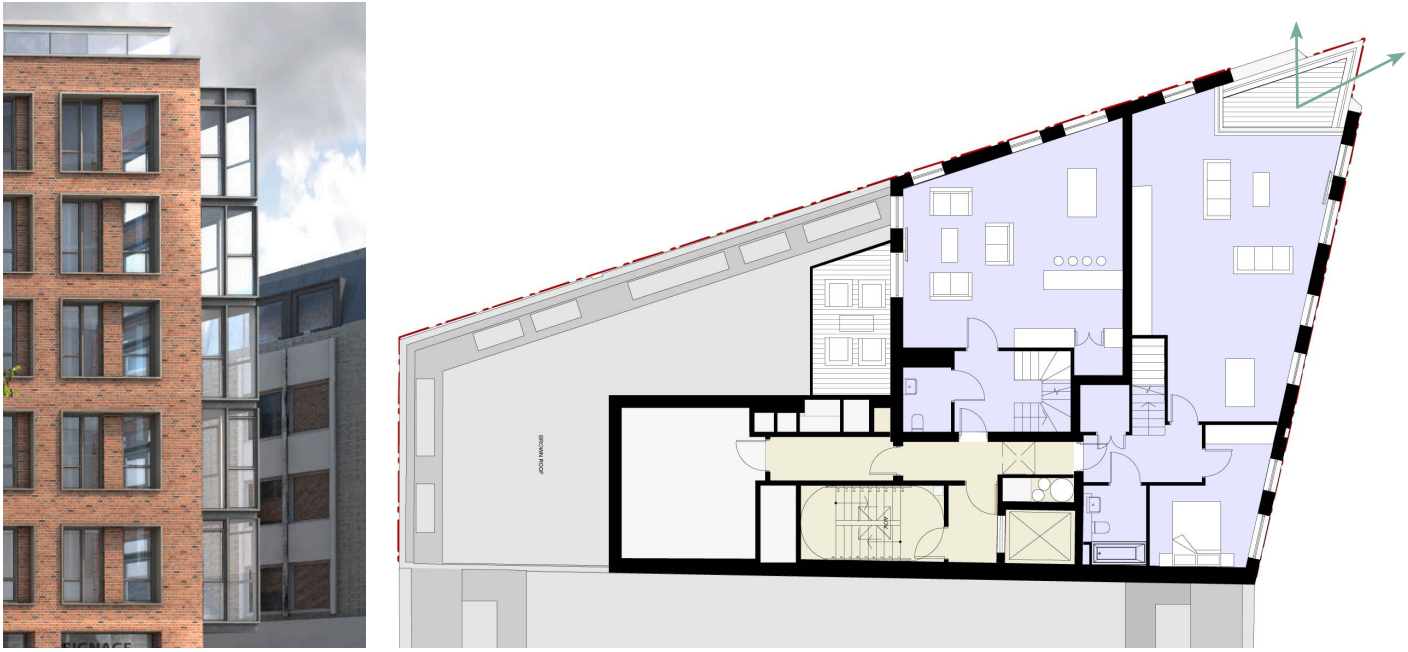
03 No.295 Euston Road Planning Application number 2010/6319/P





Comments

Response

<p>‘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.’</p>	<p>Not all the kitchens within the scheme are designated as habitable rooms and therefore are not required, within BRE standards, to have an Average Daylight Factor of 2% or more. However the kitchens which are integrated into the living space do achieve the 2% standard. Please refer to the Daylight and Sunlight report submitted with the application for further information.</p>
<p>‘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 floor area 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.’</p>	<p>All units have been designed to meet Mayor’s London Housing SPG 2012 standards where feasible within the restrictions of the existing building. All units meet the minimum room standards identified within the pre-application letter from LBC. Please refer to the appendix referring to the Mayor’s London Housing Assessment for further information.</p>
<p>‘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.’</p>	<p>Please refer to the Noise Assessment and Air Quality Assessment submitted with this application.</p>
<p>‘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.’</p>	<p>We do not propose any units along Euston Road having balconies, instead we have provided them with individual winter gardens with dramatic views towards Regents Park.</p> <div data-bbox="1400 1270 2715 1879"></div>



#### 4.3.5 Neighbouring amenity

##### Comments

##### Response

'Daylight - The closest neighbouring residential units are located at No. 175 Cleveland Street opposite the application site. You have submitted daylight information with suggests that the proposed development would impact on daylight to the kitchen/dining room of the first floor level 2 bedroom flat. This room current 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 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.'

Please refer to the Daylight and Sunlight report submitted with the application for further information.

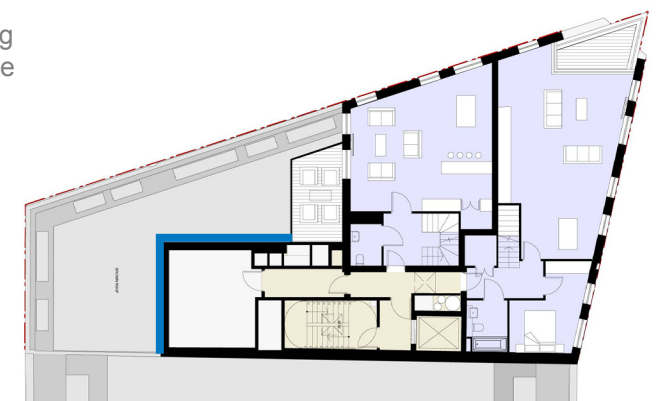
'Privacy and overlooking - There may be a level overlooking between the proposed units and the residential units at No. 175 Cleveland Street however, given the distance of the 12 metres between the properties and that this is a typical arrangement having buildings in residential use on either side of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

The street line has been set by the existing building and the street line along Cleveland Street. The windows have been orientated to minimise overlooking and protect the privacy of the residential users.

'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.'

The plant at fifth floor has been designed to minimise the impact on the neighbouring residential properties, in particular unit 5.2 which overlooks the plant area. The plant screening has been designed so no unit views directly into the plant area. This is of particular importance as there is no roof to the plant area in this location.

Please refer to the Noise Assessment submitted with the application for further information.





4.3.6 Transport

Comments

‘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.

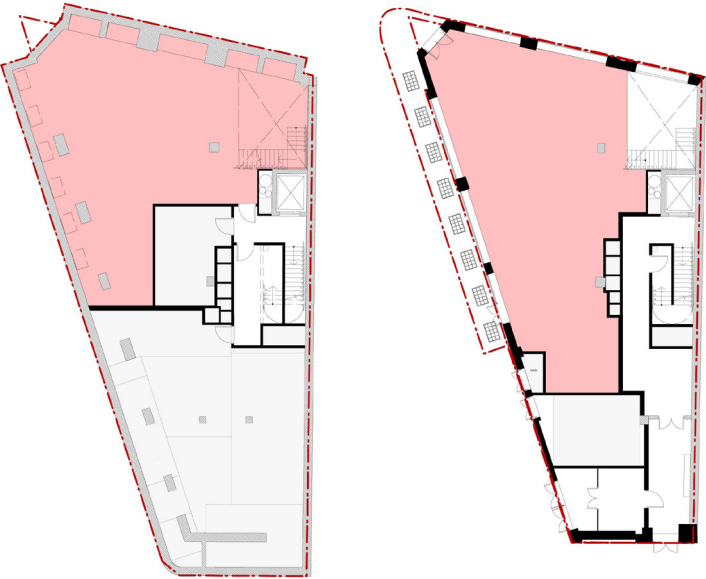
As outlined in CPG7, ‘cycle parking needs to be accessible (in that everyone that uses a bike can easily store and remove a bike from the cycle parking) and secure. The route from cycle parking to street level should be step free. Cycle parking inside buildings should be at the entrance level of the 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.’

‘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.’

Response

Following the pre-application meeting, the A1/A3 unit proposed has become an A1/A3/B1 flexible use unit at ground and basement level with the removal of the existing car lift and the proposed car parking at lower ground floor.

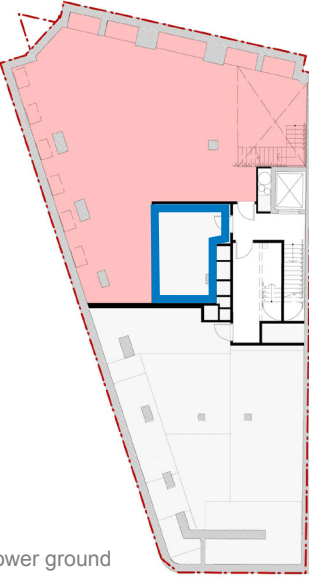
This was in response to the council’s preference for a car-free development and increase in employment area provision.




Lower ground                      Ground

19 cycle spaces are provided within the basement in accordance with Camden Parking Standards. It is not possible to include cycle parking at ground level for the residential units due to the amount of servicing already occurring at ground floor and the limited street facade remaining for commercial use.

However a bike wheel ramp will be provided on the side of the stair to the basement to allow easy access for cyclists. The cycle store is to be secure.



Lower ground



Cycle ramp

Please refer to the Construction Management Plan Summary within the Design Response section of this document for an overview of our proposals. In addition a Construction Management Plan will be submitted at a later date prior to construction.



Comments

'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 runoff 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.

Response

We are not excavating the basement for the proposed scheme. The proposals retain the existing basment with minimal intervention to the external wall. Please refer to the existing and proposed sections below for clarity.

Existing Section

Proposed Section

4.3.8 Sustainability

Comments

‘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.’

‘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.’

Response

LBC have agreed that the commercial unit should achieve BREEAM Very Good, the existing building which is being converted to residential is required to achieve BREEAM Domestic Refurbishment Excellent and the new build residential accommodation is required to meet Code for Sustainable Homes Level 4.

Further information regarding the standards associated with the proposals should be found within the Energy Statement and Sustainability Assessment submitted in support of this application.

Please refer to the Energy Statement and Sustainability Assessment submitted in support of this application for further information.



## 4.4 Design development

Following the consultation process, a summary of design requirements were assessed:

### Commercial

- Flexible A1/A3/B1 Ground Floor Unit
- Increase in size of the commercial unit

### Transport

- Removal of existing car lift and car parking
- Car Free development
- Cycle parking to be provided to policy standards in basement
- Bike ramp to be incorporated into staircore

### Residential

- Increase the number of 2 bedroom units
- No affordable housing to be provided on site
- All units to be designed in accordance with Lifetime Homes
- All flats to be designed to Mayor's London Housing SPG 2012
- 10% of units to be Wheelchair Adaptable
- Winter gardens to be provided along Euston Road
- Whole house ventilation to be provided to all units
- All habitable units to meet BRE daylight standards

### Scale and massing

- Reduce height of north block to not exceed 365 Euston Road
- Soften the material treatment to the top floor
- Minimise impact on views of the BT Tower

### Appearance

- Brick facade to be provided to both northern and southern blocks
- Ground floor glazing to be refined

### Environment

- Minimise impact on the adjacent street tree
- Design swift bricks into the facade
- Provide a brown roof at fifth floor

