

Student Housing

5.55 **Policy CS6(c)** states the Council '*supports the supply of additional student housing, bedsits and other housing with shared facilities providing this does not prejudice the supply of additional self-contained homes*'.

5.56 **Policy DP9** states that the Council will support development of housing with shared facilities (other than housing designated for older people, homeless people or vulnerable people) and student housing provided that the development:

- a) will not involve the loss of permanent self-contained homes;*
- b) will not prejudice the supply of land for self-contained homes, or the Council's ability to meet the annual target of 437 additional self-contained homes per year;*
- c) does not involve the loss of sites or parts-of-sites considered suitable for affordable housing or housing for older people or for vulnerable people, particularly sites identified for such provision in our Camden Site Allocations Local Development Framework document;*
- d) complies with any relevant standards for houses in multiple occupation (HMOs);*
- e) will be accessible to public transport, workplaces, shops, services, and community facilities; and*
- f) contributes to creating a mixed and inclusive community.*

Student housing development should:

- g) serve higher education institutions based in Camden or adjoining boroughs;*
- h) be located where it is accessible to the institutions it will serve; and*
- i) include a range of flat layouts including flats with shared facilities.*

Design

5.57 **Policy DP24 - Securing high quality design** states,

The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;*



- b) the character and proportions of the existing building, where alterations and extensions are proposed;*
- c) the quality of materials to be used;*
- d) the provision of visually interesting frontages at street level;*
- e) the appropriate location for building services equipment;*
- f) existing natural features, such as topography and trees;*
- g) the provision of appropriate hard and soft landscaping including boundary treatments;*
- h) the provision of appropriate amenity space; and*
- i) accessibility.*

Environment

5.58 **Policy DP22 - Promoting sustainable design and construction states,**

The Council will require development to incorporate sustainable design and construction measures. Schemes must:

- a) demonstrate how sustainable development principles, including the relevant measures set out in paragraph 22.5 below, have been incorporated into the design and proposed implementation; and*
- b) incorporate green or brown roofs and green walls wherever suitable.*

The Council will promote and measure sustainable design and construction by:

- c) adopting the government target that all new build housing will be zero carbon by 2016 (Code for Sustainable Homes Level 6), along with the stepped targets of Code 3 by 2010 and Code 4 by 2013;*
- d) expecting developments (except new build) of 500sqm of residential floorspace or above or 5 or more dwellings to achieve 'excellent' in EcoHomes assessments from 2013 and at least 'very good' prior to 2013;*
- e) expecting non-domestic developments of 500sqm of floorspace to achieve 'very good' in BREEAM assessments, with the aim of increasing the target to a rating of at least 'excellent' in 2016, if feasible, and zero carbon from 2019, in line with the government's ambitions.*

The Council will require development to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures, such as:

- f) summer shading and planting;*
- g) limiting run-off;*

- h) reducing water consumption;*
- i) reducing air pollution; and*
- j) not locating vulnerable uses in basements in flood-prone areas.*

Summary

- 5.59 It is considered that the proposed development accords with current and emerging national, regional and local planning policies. The regeneration of this vacant site provides a significant contribution to the economic and social development of the area as well as complying with the objectives of sustainability. The development has been carefully considered to ensure it respects and enhances its surroundings particularly in terms of its design. The next section will provide further analysis of the development against the above policies.



6.0 EVALUATION

- 6.1 This section provides an evaluation of the proposals against the national, strategic and local planning policy and guidance set out in Section 5.0. A full analysis of the proposals against relevant planning policy is set out below.

The Principle of Development

- 6.2 The need for regeneration of the site through redevelopment is recognised at all levels. The site lies within the Central Activities Area in which development in London will be focussed. The application proposals are consistent with PPS1 objectives in terms of sustainability and enhancement of the vitality and viability of the area. They also accord with the PPS1 requirements of good design and generating additional trips at a location served by a variety of alternative modes of transport. The proposed scheme in an urban location represents a sustainable approach to development and is supported by the objectives of PPS1.
- 6.3 The application proposes the use of previously developed urban land in a location that is well served by public transport. The proposed development is in accordance with the character and established uses of the area and is in support of the principles of sustainable development promoted by PPS1. The area around the site is identified as being the main focus for University activities in the Borough as well as central London and is an appropriate location for further growth.
- 6.4 In terms of site suitability, the development accords with these underlying principles in:
- Redeveloping a previously developed brownfield site;
 - Providing student accommodation in close proximity to higher education facilities
 - Locating the development close to excellent public transport links which minimises the need to travel;
 - Use of sustainable materials and construction methods, which will result in an energy efficient building. The buildings have been designed to obtain BREEAM

rating of 'Very Good'.

- Providing a mix of units within the building to accommodate different needs and providing a more vibrant community as a result;
- Using an existing developed area more effectively whilst making it a more attractive place to live.

6.5 All these, together with the identified need for the regeneration of the site; meeting the needs of an identified student requirement; and the prominent location of the site presents an opportunity for a comprehensive high quality development. The application proposal is for development on a brownfield site in the centre of London. As such it is appropriate for supporting regeneration and urban renaissance encouraged in PPS1 and Objectives 1 and 6 of the London Plan. This will make the best use of the land, an important resource, which Objective 1 of the London Plan seeks to be used in an effective and sustainable manner so that growth can occur without encroachment of open spaces. The proposal does not only have a sustainable location but is also located where it will meet local and strategic student need and where occupants will be living with good access to central London using public transport.

Land Use Considerations

Employment Use

i. Warehouse Use

6.51 The loss of the B8 (warehouse) use in the first instance should not be contentious. The site has developed into a warehouse historically and does not now meet the specific demands of tenants/occupiers of warehouse units. This application is supported by a Commercial Planning report prepared by CBRE which sets out the requirements for modern tenants and concludes that the site is not appropriate for continued B8 use. The main reasons for this are:



Modern Tenant Requirements for B8 use:

- Single storey property of steel portal frame construction
- 3 loading doors (1 loading door per 10,000 sq ft)
- 8m minimum eaves height
- 3 phase power
- 35-50 kN/m² floor loading
- 10% office content
- Good sized yard area
- Good delivery access (suitable for HGV's)
- 40% site coverage (depending on location)
- 24/7 access
- Zero use restrictions

Constraints of the existing building:

- Awkward configuration of the accommodation (arranged on basement, ground and three upper floors – with a central core).
- From inspection the property is likely to have limited floor load bearing capacity on the upper floors although this has not been tested.
- Low floor to ceiling height
- 1 loading door only
- No yard area
- Poor access (delivery area) at rear of property via Stephenson Way
- High site coverage close to 100%

6.52 Although the site is located within close proximity to Euston Station, its central London location (on the edge of the Congestion Zone) does not provide easy access to the national motorway network. Supply and occupier demand for storage and distribution warehouses of circa 30,000sqft close to central London is typically concentrated on more established industrial locations which benefit from good communication links, including both rail and motorway access.

6.53 Such established industrial locations close to central London include

Tottenham/Haringey (North East), Willesden/Staples Corner (North West) and Acton/Park Royal (West) which all provide direct links to both central London and the national motorway network:

- Tottenham is located approximately 6.6 miles from J25 of the M25 via the A10
- Willesden is located approximately 3 miles from J1 of the M1 via the A406
- Staples Corner is located approximately 0.5 miles from J1 of the M1
- Acton is located approximately 1.7 miles from J1 of the M4 via the A406
- Park Royal is located approximately 3 miles from J1 of the M1 via the A406, approximately 10.2 miles from J1 of the M40 and approximately 11.5 miles from J16 of the M25

6.54 In addition to the communication benefits, these established industrial locations comprise industrial estates which can provide 24 hour access with on-site security (CCTV and gatehouse), representing a further attraction to occupiers.

6.55 In terms of the requirements of **Policy E2**, the following assessment is made:

a) whether the site is in or adjacent to the Industry Area;

The site is not located in or adjacent to an Industry Area.

b) the size of the site and whether it could potentially provide for servicing by large vehicles;

The building can only be serviced from the rear at Stephenson Way which is a narrow street that is unable to accommodate large and regular vehicle movements

c) whether the site is particularly suitable for small firms;

The site is not suitable for small firms due to the irregular floorplates and internal layouts which makes it very difficult to sub divide.

d) the accessibility of the site by public transport and by service vehicles;

The site is accessible by public transport but is not suitable for larger service vehicles.



e) the relationship of the site to nearby land uses;

The site is located within a commercial area with office premises and University accommodation.

f) the demand, supply and variety of sites that are suitable for employment uses, firstly in that particular use class, and secondly in business use in general, and

The demand for the site in its current use as a B8 warehouse has been demonstrated to be very limited. The supporting Commercial Planning Report from CBRE confirms this. The use of the site for alternative B1 use is set out below.

g) the retention of design features that enable flexible use, including use for light industry as part of schemes for the redevelopment or alteration of industrial premises for B1 purposes.

The current form of the building does not lend itself to continued B8 use in terms of the modern requirements for such space. The constraints are set out above and these could not be overcome without a comprehensive redevelopment of the site. Even if the site was redeveloped, the building would not be located in an area suitable for warehouse use whilst issues regarding access and servicing would remain.

6.56 In terms of draft Policy **DP13** of the LDF Development Policies, the following assessment is made:

The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:

a) it can be demonstrated to the Council's satisfaction that a site is no longer suitable for its existing business use; and

The information set out above and within the Commercial Planning Report confirms that the building is not viable for continued B8 use;

b) there is evidence that the possibility of reusing or redeveloping the site for similar or alternative business use has been fully explored over an appropriate period of time.

The Wellcome Trust have reviewed the development opportunities for the site since it became vacant in 2007. As such there has been limited marketing of the

site as a short term occupier for the building in its current use as as B8 warehouse would have been highly unusual especially taking into account the constraints of the building for such use as set out earlier in this Statement.

ii. Alternative Employment Use

6.57 CBRE considers that the level of demand for use of Bentley House as office in its current condition would be extremely limited. This is primarily due to the following:

- Floor to ceiling height – Although the slab to slab height varies throughout the building, it is generally too low to accommodate a raised floor and suspended ceiling. This is clearly evidenced in the front section of the building which comprises a number of small office rooms benefiting from suspended mineral fibre tiled ceiling and category II compliant lighting, albeit with solid floors and perimeter trunking power supply.
- Power supply – The power supply in the building is insufficient for office use, with floorplates of this size generally requiring full access raised floors.
- Floor plate layout – The floor plates are awkwardly arranged around a large central lightwell, with a number of structural walls and stepped levels further restricting the flexibility of the accommodation.
- Cooling – There does not appear to be a sufficient cooling system in the building.
- Natural light – levels of natural light in the building are low particularly at ground floor level. Although the upper floors benefit from being arranged around a central lightwell, the window openings to all elevations of the building are small and restricted. Furthermore the glazing in the building appears to be single glazed throughout which presents a both a security and heating/energy efficiency issues
- Lighting – There is a mixture of lighting in the building, and although the front office rooms do benefit from recessed category II lighting, generally the lighting provision in the building is insufficient for office use – largely comprising fluorescent strip lighting suitable only for storage purposes.
- Access / Reception – The main ground floor entrance to the building (Euston Road) and reception area is insufficient for occupational office purposes. This deficiency would be compounded if the building was multi-let.



- WC's – There is only one set of female and male WC's serving the building, located on the first floor. This is inadequate for an office building this size where we would expect at least one, if not two mixed gender (or sets of male and female) WC's per floor.

6.58 The requirement to consider the potential use of the site for alternative commercial use within the B use Class is necessary under Policy E2 of the UDP and draft Policy DP13 of the Development Policies. The assessment against Policy E2 is as follows:

a) whether the site is in or adjacent to the Industry Area;

The site is not located in or adjacent to an Industry Area.

b) the size of the site and whether it could potentially provide for servicing by large vehicles;

The building can only be serviced from the rear at Stephenson Way which is a narrow street that is unable to accommodate large and regular vehicle movements

c) whether the site is particularly suitable for small firms; **The CBRE report confirms the constraints of the existing building in terms of its layout and internal configuration which would make it difficult to let or even sub divide for office use. This is compounded by the single WC provision for the whole building**

d) the accessibility of the site by public transport and by service vehicles;

The site is accessible by public transport but is not suitable for larger service vehicles.

e) the relationship of the site to nearby land uses;

The surrounding area is generally in commercial use with the two adjoining properties being in commercial B1 use.

f) the demand, supply and variety of sites that are suitable for employment uses, firstly in that particular use class, and secondly in business use in general, and

The CBRE Report has analysed the building for alternative employment use in its current form and concludes that the demand is highly limited.

g) the retention of design features that enable flexible use, including use for light industry as part of schemes for the redevelopment or alteration of industrial premises for B1 purposes.

The final section of the CBRE Commercial Report considers the potential demand for office use in the building as part of a redevelopment option behind the retained front bay onto Euston road. This would eliminate the issues regarding the constrained floorplates, internal configuration and issues regards energy efficiency and access but the CBRE report then considers the demand and supply for office use in the local area. In such circumstances, CBRE consider that the level of demand for use of Bentley House as modern high quality offices following redevelopment behind the retained front bay to a modern Grade A standard would remain limited. This is based on the following information –

- **Site coverage appears to be 100% with restrictions to both the east and west facades from the adjacent buildings compounded by the fact that the building is relatively long and narrow in shape. The retention of the Euston Road front bay would restrict the levels of natural light available within the building, which predominantly will be derived from the north facing rear façade and central lightwell. A large central lightwell (as in its current form) would restrict the flexibility of the floorplates.**
- **Following redevelopment, the building would provide circa 6,000 to 8,000 sq ft of NIA office accommodation per floor. This is likely to be considered too small and restricted by potential occupations when compared to competing developments in the Euston submarket.**

CBRE have considered the demand and supply for office space in the local area and the competing developments which are currently coming on stream. They conclude that Bentley House would struggle to compete with the current new purpose built office developments and proposed developments in the locality such as Regents Place and Kings Cross Central.



The CBRE report then considers the 'pipeline' office development and state that the total quantity of newly developed office accommodation scheduled to be bought to the market in the near future is significant, totalling in excess of 3,600,000 sq ft. CBRE therefore consider that, due to the size of the development supply pipeline, the impact of not redeveloping Bentley House as B1 office accommodation would be of little to no significance.

Clearly developments such as Regents Place, King's Cross Central, Euston Xchange and the proposed development at Euston Station will dominate the office market in the Euston/King's Cross locality, further decreasing the levels of potential demand for using Bentley House as offices.

iii. Residential Use

- 6.59 The default position for Policy E2 of the UDP and policies DP1 and DP13 of the Development Policies is where it can be demonstrated that the use of the site for continued commercial use is no longer viable (as illustrated above) then the Council will seek to use the site for permanent residential use.
- 6.60 In considering the appropriateness of the site for residential use, this section considers both the existing building and a redeveloped building.

Residential Amenity

In introducing residential use to the site, the Council would require the provision of suitable private and communal amenity space. Whilst there is no clear guidance on this from the Council's current planning policy documents, it is assumed that a standard provision of circa 10sqm per unit would be required in addition to some communal space. The architectural quality of the Euston Road façade as well as the traffic noise issues would prohibit the provision of any outdoor amenity space on the main front façade. As a result, any amenity space would need to be provided on the quieter rear façade. This elevation however is north facing and therefore does not benefit from any natural sunlight and is also enclosed between two larger buildings which create significant overshadowing. Therefore whilst it may be physically possible to provide outdoor amenity space on the rear, it would result in

environmental conditions which would mean that space is not used and could not be classified as acceptable for residential living/amenity purposes.

The residential requirements for meeting the BRE residential daylight and sunlighting standards are more rigidly enforced compared to student accommodation. It is likely therefore that each floor of the building would have to include a series of lateral units thereby avoiding units which are solely north facing which would not be acceptable. However, this would create long, deep units with internal conditions which are unlikely to meet the BRE standards. A central lightwell may alleviate this but it would result in a series of north facing units with limited light from the lightwell and would also significantly reduce the potential capacity of the site as a result. Paragraph 5.13 of the Development Policies document states that *'Homes where all windows face a single direction should also be avoided, especially in the case of large homes'*.

The ground floor of the building would not provide sufficient protection in terms of residential amenity, privacy and general disruption particularly on the Euston Road elevation. As such, it would not be appropriate to place residential use in the front section of the ground floor of the building which would further reduce the capacity of the building. The introduction of an alternative use such as a retail unit would severely compromise the rest of the ground floor as servicing and refuse collections would only be possible from Stephenson Way. A dedicated route through to the rear would therefore be necessary would reduce the capacity of the ground floor.

Equally the basement level would become superfluous as there would be limited opportunity to provide any meaningful residential accommodation on this level without creating the large lightwells shown in the proposed scheme.

The amenity issues alone should be sufficient to demonstrate the inappropriateness of the site for residential use. However, to further support the application, the following should also be viewed as material considerations-



Restriction of future development of adjoining sites.

Whilst the site to the east is a Grade II listed building and therefore unlikely to be redeveloped, the site to the west at 210 Euston Road as well as those properties to the rear of Stephenson Way offer a significant potential for commercial redevelopment. However, this opportunity would be severely prejudiced with the introduction of residential use on the Bentley House site due to the constraints it would place on development by establishing daylight and sunlight rights as well as any issues regarding the impact on residential amenity. It is highly unlikely that any development at the rear or at 210 Euston Road would be able to maximise the development opportunity as a result as any increases in height or bulk would be unacceptable due to the impact on the residential units that Council may seek at Bentley House.

Whilst this statement has argued that the Bentley House site is not appropriate for continued office use, the adjoining premises at 210 Euston Road as well as the block adjoining it have been considered for a large commercial development and initial discussions were held with officers at Camden in 2008. Such proposals would be appropriate within this location but would be highly compromised by the introduction of residential use at Bentley House.

Residential Mix

The Council require a mix of units in most residential development proposals having identified an over provision of small units in the Borough. Policy DP5 (b) states that a 'mix of large and small homes in all residential developments of 5 homes or more' whilst the supporting text at paragraph 5.5 states that at least 40% of market units should be 2 bed units. The requirement to provide larger units again conflicts with the nature of the site and the constraints in having to provide outdoor amenity space including space preferably at ground floor for the family units as well as meeting the required daylight and sunlight levels for all of the units.

In terms of the use of the building in its existing form, paragraph 5.8 of the Development Policies Document states that *'Where a development involves re-use of an existing building, this may limit the potential to provide a range of dwelling sizes. Issues that can arise include the creation of access via an existing staircase or lift;*

respect for the integrity of existing structural walls and patterns of windows; changes in floor level; and heritage designations (listed building and conservation area status) that may restrict alterations. The Council will have regard to these issues, alongside the expectations arising from development size'. This is a clear acknowledgement from the Council that certain sites due to internal or architectural constraints may not be appropriate, or present significant difficulties for residential use.

- 6.61 In considering the specific criteria set out in Policy DP1 which requires residential floorspace where more than 200sqm of new floorspace is proposed upon redevelopment, the following needs to be taken into account –

Policy DP1 - In considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:

- a) the character of the development, the site and the area;

The site and immediate surrounding area are not conducive for the provision of residential accommodation with good internal living conditions. The position of the Euston Road as well as the north-south orientation places severe constraints on the building as outlined above.

- b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;

The additional floorspace created by the proposed development is created by utilising the basement area for student accommodation benefitting from the two lightwells and the extension at roof level. The basement area could not be used for meaningful residential use whilst the new extension is intrinsically linked to the student accommodation on the lower floors. The introduction of residential use on these upper floors would be severely constrained by the requirement to provide a separate core and access through the building thus compromising the efficient use of the floors for student use. In addition, the residential amenity issues outlined above would still apply to any new residential units on the upper floors as part of a mixed use development.



c) the need for an active street frontage and natural surveillance;

The existing Euston Road frontage is being retained and therefore any activity at street level is restricted by the layout and form of the building and the position of the retained windows.

d) the economics and financial viability of the development including any particular costs associated with it;

A viability assessment has not been submitted with this application and does not form part of the justification for the proposed use on site.

e) whether the sole or primary use proposed is housing;

As set out above, the use of the site for residential use would be inappropriate and would not meet relevant residential design standards.

f) whether an extension to the gross floorspace is needed for an existing user;

The building is vacant and therefore there is no current demand from an existing user for the building or the new floor area proposed. The proposed extension to the building is an architectural response to a site which is overshadowed by two much taller flanking buildings. The response create a more complete townscape view along Euston Road and whilst the additional floorspace is naturally a benefit to the scheme, the architectural response is much more important and has been support by Camden Council's design and conservation team

g) whether secondary uses would be incompatible with the character of the primary use;

The introduction of residential use as a secondary use in the building would be severely constrained by the requirement to provide a separate core and access through the building thus compromising the efficient use of the floors for student use.

h) whether the development is publicly funded;

No.

i) any other planning objectives considered to be a priority for the site.

The site has no formal designation within the adopted UDP or the emerging Core Strategy. As such there is no defined 'priority' use for the site.

6.62 In summary, the site is not appropriate for residential use for the numerous reasons set out above. This has been assessed and justified against the relevant Borough planning policies.

iv. Student Use

6.63 There is unprecedented demand for student accommodation in the wider London area and specifically in Camden. Student numbers are expected to increase significantly in the short to medium term.

6.64 A Student Accommodation Supply and Demand Study by King Sturge has been commissioned and forms part of the submission. The report provides an assessment of student need in London as a whole and then focuses on student need in Camden. The findings of the report conclude that there is substantial need within the Borough for dedicated student accommodation.

6.65 University College London who have close ties with the Wellcome Trust have written in support of the application proposals. A copy of their letter is appended to the King Sturge Report.

6.66 The design and internal layouts associated with the student accommodation have been developed in close consultation with experienced operators of student accommodation facilities and have been reviewed by UCL. The proposed accommodation will meet the needs of the modern student and create an environment that is conducive to further education learning in an urban environment. The proposed student accommodation will be affordable to both undergraduate and postgraduate students.

6.67 The siting of student accommodation will contribute towards the vitality and viability of the area by increasing pedestrian activity and generally bringing life into the area.

6.68 The site is located in within a very accessible area rated PTAL 6B and therefore will provide easy access for students.



- 6.69 In terms of an assessment against relevant planning policy, the adopted UDP references Policy H9 which states:

The Council will grant planning permission for new hostel accommodation or for the expansion of existing hostel facilities provided:

- a) there is no loss of residential floorspace within Use Class C3,

The site has been vacant since 2007 and was previously occupied for B8 warehouse use. The site has never contained any residential use not been designated for such use in any adopted Council documents.

- b) there is no net loss of a use in the Central London Area that supports the residential community; and

As stated, the lawful use of the site as a B8 warehouse does not contribute to the local area nor would it contribute to a residential community if there was one in close proximity.

- c) harm is not caused to the surrounding area.

The proposed student use would actually improve the area with the reactivation of a vacant building and the introduction of more people in a vibrant student community.

- 6.70 In terms of the emerging policies, the Development Plan Policy **DP9** is relevant and our assessment against this policy is set out below.

The Council will support student housing developments where—

- a) will not involve the loss of permanent self-contained homes;

The site has been vacant since 2007 and was previously occupied for B8 warehouse use. The site has never contained any residential use not been designated for such use in any adopted Council documents.

- b) will not prejudice the supply of land for self-contained homes,

As set out in the earlier sections, for reasons of amenity, mix, daylight and sunlight and the prejudicial effect it would have on the adjoining commercial properties, the site is not suitable for providing permanent residential

accommodation.

c) does not involve the loss of sites or parts-of-sites considered suitable for affordable housing or housing for older people or for vulnerable people, particularly sites identified for such provision in our Camden Site Allocations Local Development Framework document;

As set out in (b) above, for reasons of amenity, mix, daylight and sunlight and the prejudicial effect it would have on the adjoining commercial properties, the site is not suitable for providing permanent residential accommodation. As a result it would also not provide a suitable development opportunity for affordable housing or housing for older people or for vulnerable people. The site has no allocation for such use in the emerging LDF documents.

d) complies with any relevant standards for houses in multiple occupation (HMOs);

The proposed development would not be classed as an HMO. It will however meet all relevant standards for internal living conditions and a BREEAM multi residential rating of 'very good' will be sought.

e) will be accessible to public transport, workplaces, shops, services, and community facilities; and

The site lies adjacent to Euston Station and is therefore highly accessible to public transport links. This is set out in more detail in the accompanying Transport Statement.

f) contributes to creating a mixed and inclusive community.

The scheme provides a clear mix of units with cluster units, double units, studio units and wheelchair accessible units in line with the Council's requirements. This mix of units secures a varying mix of unit sizes thereby attracting a wider range of students in a more vibrant community.

Policy DP9 further states that student housing development should:

g) serve higher education institutions based in Camden or adjoining boroughs;

The application is supported by a letter from UCL which confirms that they have been involved in the design process and support the application as it will be able to offer much sought after accommodation for their students. The



Wellcome Trust have long historical links with UCL and this partnership will create a successful scheme at Bentley House

h) be located where it is accessible to the institutions it will serve; and

The site is ideally located within short walking distance of the UCL campus and the wider 'University Quarter' in Bloomsbury.

i) include a range of flat layouts including flats with shared facilities.

The scheme provides a clear mix of units with cluster units, double units, studio units and wheelchair accessible units in line with the Council's requirements. This mix of units secures a varying mix of unit sizes thereby attracting a wider range of students in a more vibrant community.

6.71 In summary, the proposed use of the site for student accommodation meets and complies with the requirements of both adopted and emerging planning policy. It is important to note the supporting text in the Core Strategy which sets out the anticipated requirement for student housing. It states at para 6.49 *'the growth of student numbers could place severe strain on the stock of private rented housing. Therefore, the Council anticipates that most of the figure for non self-contained homes (1,500 homes from 2010/15 to 2024/25) will be met by developments involving designated student accommodation'*.

6.72 The supporting text to Policy DP1 in the Development Plan Policies states that *'in the context of development for an educational institution supported by the Higher Education Funding Council for England, as an alternative to self-contained housing, the Council may accept student housing that serves the same institution'*.

6.73 In conclusion there is policy support for student accommodation where the relevant policy criteria can be met. On balance, it is considered that the proposals satisfy and comply with the relevant planning policy and guidance..

Design

- 6.74 A full evaluation of the design of the proposed development and its relationship to the surrounding urban context is set out within the Design and Access Statement which is submitted as part of the planning application. A summary of the key aspects of the design and an evaluation against relevant planning policies is set out below. The development proposes a high quality design which will maximise the potential of the site whilst ensuring that there is no adverse impact on the varying character of the surrounding area.
- 6.75 The application proposal is considered to be of a high standard of design and architectural quality which will make a significant contribution to improving the physical quality of the area, whilst respecting the conservation value of its location. The design responds to its context both as the revitalisation of a vacant building and the surrounding townscape. The proposal will contribute positively to the setting of the Bloomsbury Conservation Area and this is set out in more detail in the accompanying PPS5 Statement.
- 6.76 The Design and Access Statement describes how the proposals have been carefully designed with regard to the context of the site in order to provide a high quality design solution that is of an appropriate scale and massing.
- 6.77 It is therefore considered that the proposals will make a positive contribution to the character of the area, in line with policy B1. The scheme therefore accords with the appropriate planning policy design criteria providing a well designed and high quality scheme. The development will also be sustainable both in terms of the pattern of development provided and energy conservation and the impact on the environment.
- 6.78 Proposals are therefore considered to be consistent with the aims of Conservation Area policy, specifically PPS5, and UDP Policies B1, B3 and B7 and emerging policy DP24.



Transport

- 6.79 A full evaluation of the proposed development in traffic and transport terms is contained within the Transport Assessment prepared by TPP. The site is very well served by public transport and provides an opportunity for a sustainable development in transport terms, and includes bus, London Underground and national rail, as well as cycling and walking.
- 6.80 The report describes how the site is very well served by all main transport uses. The proposals meet the objectives set out in PPG13 and UDP Policy T1, T3 and T7. The application site offers excellent accessibility by non-car means of transport. It is accessible by pedestrians and already benefits from a choice of bus services along Euston Road as well as serviced provided at Euston Station, Euston Square and Warren Street.
- 6.81 The application proposals include facilities for cyclists. The proposals provided 85 cycle spaces (1 space per two occupants) as required by policy. This is consistent with the objectives of UDP Policy T3 and T7 which promote cycling and walking.
- 6.82 It is acknowledged that a Green Travel Plan will be required to ensure that management and use of the proposed uses occurs in a sustainable way and a draft is included within the TA.

Energy

- 6.83 In accordance with London Plan policy 4A.8 an Energy Statement has been submitted with this application. The Energy Statement, prepared by Ramboll summarises the measures used to ensure that the scheme meets the low energy consumption requirements.
- 6.84 The proposed scheme adheres to the London Plan's requirement for developments to be sustainable in policy 5C.1 and Objective 10 of the Mayor's Sustainable Development Framework, the Proposed Development features the following energy-saving measures:

- Improved U-values beyond Part L compliance;
- All internal, external and communal lighting to be provided through low energy lighting,
- wherever possible;
- Improved air permeability beyond Part L compliance;
- Energy efficient mechanical and electrical plant.
- Targeting a BREEAM multi residential rating of 'Very Good' as required by emerging Policy DP22.

6.85 The heating and hot water shall be supplied by a Combined Heat and Power (CHP) engine connected to a low loss header from where heating water and domestic hot water can be supplied.

6.86 The passive technologies and energy saving measures above lead to an annual emissions rate of 737 tCO₂. The addition of a CHP unit provides an annual reduction of 147 tCO₂ which equates to a reduction of 20 % of the total site carbon dioxide emissions. Also, there is limited scope for the addition of Solar Photovoltaics on site. It is tentatively suggested, pending a more detailed shading analysis, that 20m² of PV could be integrated at the North end of the roof of the development. This would produce CO₂ savings of 1.5 tonnes, or, approximately 0.2% of site emissions. The development is therefore compliant with the Mayor's London Plan and Camden's UDP.

Design Standards

Noise

6.87 A detailed acoustic survey of the site has been carried out and the results and recommendations of this are in the Noise Report which accompanies this application. In reference to PPG24 and UDP policy SD7, it is considered that through the use of the right materials and insulation, the scheme can provide good quality internal living conditions throughout the building. Overall, it is considered that the incorporation of the recommended mitigation measures will reduce noise levels and is therefore acceptable in relation to guidance set out in PPG24.

*Daylight and Sunlight*

- 6.88 The application is supported by a daylight and sunlight analysis prepared by Gordon Ingram Associates. There are no adjoining residential units and therefore there is no requirement to study the impact of the proposed development on adjoining neighbours. The report also assesses the internal living conditions for the proposed bedrooms and confirms that the scheme will meet the requirements of the BRE Guidelines.

8.0 CONCLUSION

- 8.1 The application provides an opportunity to sympathetically enhance a building of architectural merit to bring it back into positive use for the local area and secure important economic, social and environmental benefits whilst achieving the essential objectives of sustainability.
- 8.2 TP Bennett has designed a building of high architectural quality which relates positively and sensitively to the setting of the Bloomsbury Conservation Area. The proposed works are set out in the Design and Access Statement and is justified against PPS5 in the accompanying PPS5 Statement prepared by KMH Heritage.
- 8.3 The scheme for redevelopment of the application site follows a series of meetings and discussions with officers from the London Borough of Camden and English Heritage. During this process, there have been significant alterations to the scheme, in terms of building form and massing, together with elevational treatments to address officers' comments and observations.
- 8.4 The development for student accommodation on the site responds to a demonstrable need and demand for such a use within this part of London and is supported by UCL.
- 8.5 The proposals are sustainable in that they constitute development which maximises the potential of the site in a location that is highly accessible by public transport and is located within short walking distance of UCL and other higher education institutions.
- 8.6 The development is designed to meet the exacting sustainability requirements of both local and regional policies. The building will combine a CHP with photovoltaic cells to reach the 20% carbon reduction targets through alternative energy sources and will be targeting a BREEAM multi residential rating of 'Very Good'.



- 8.7 The scheme has been designed to provide a range and mix of units, and offers the potential to accommodate a wider mix of students ranging from undergraduates to postgraduates including those with families.
- 8.8 The Transport Assessment has demonstrated that the site is very well located in terms of public transport accessibility to meet the scale of the development proposed.
- 8.9 The application proposals comply with the policies within the UDP and principles of sustainable development identified in national and strategic planning guidance, in terms of developing a previously developed and now vacant site within the urban area, with a mix and range of units that respond to identified needs.

Appendix 1 – Site Location Plan

DO NOT SCALE. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING. CHECK DIMENSIONS ON SITE AND REPORT DISCREPANCIES TO THE ARCHITECT.

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P1 18.06.10 FIRST ISSUE		CB	CB
No.	Date	Comment	Diagn
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Street Status

PLANNING

tp bennett

architecture
interiors
planning

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Project
Proposed Student Residential Development
Bentley House, 200 Euston Road
London, NW1 2DB

Drinking Time

Site Location Plan

Drawing	Date	Scale	Alt. Ref.
CB	June 2010	1:1250	A9917708FLANIOS BASE 01

to be used Project No. _____ Drawing Number _____ Rev _____

A9917 D 0 001 P1

Line indicates site demise

Line indicates land owned by
The Welcome Trust



