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For and on behalf of
The Royal College of General Practitioners

**Design and Access Statement
Incorporating Heritage Statement**

30 Euston Square

Prepared by
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DLP Planning Ltd
London

June 2015



Design and Access Statement (incorporating Heritage Statement)

Erection of permanent roof edge protection to roof at
30 Euston Square, London
For and on behalf of Royal College of General Practitioners
LCN15/2
June 2015

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1.0 INTRODUCTION

- 1.1 This Design and Access Statement is prepared by DLP Planning Ltd, on behalf of the Royal College of General Practitioners, to support a planning and listed building consent application for the erection of roof edge protection to the roof at 30 Euston Square, London, NW1 2FB.
- 1.2 The Statement provides a description of the site characteristics and the circumstances underlying the application. It provides an analysis of the context of the relevant Government and development plan policy, and concludes that the proposal in light of prevailing planning policies and other material considerations should be granted permission.
- 1.3 The accompanying documents and plans to support this application include:
1. Application forms;
 2. Site Location Plan (Be1 Architects);
 3. Application drawings (Be1 Architects);
 4. Hazard Identification Qualitative Risk Assessment and Report (Time Consultancy).
- 1.4 This Statement also seeks to set out principles of the design concept for the site in relation to the character and features surrounding the site, with specific reference to the special architectural merit and historic interest of the listed building, and the character and appearance of the surrounding Conservation Area.

2.0 SITE CONTEXT AND DESCRIPTION OF DEVELOPMENT

- 2.1 The application site falls within the London Borough of Camden, fronting both Euston Road and Melton Street and forming part of the western border to Euston Square, NW1.
- 2.2 The application site is an end of terrace, corner property formed of two conjoined buildings of five storeys each plus a lower ground floor and including roof accommodation. The building is Grade II* listed and it is located in the Bloomsbury Conservation Area.
- 2.3 The proposed areas for the roof edge protection are moderately visible from the principal elevations to Melton Street or Euston Road. There are several private, staff access doors to the roof for maintenance.
- 2.4 The College is required as an immediate and urgent health & safety matter to improve the provision of safety protection at the perimeter of the roof in three areas. At present some of the areas benefit from roof edge protection which is outlined as being insufficient in the enclosed health & safety report. The report evaluates all areas where maintenance occurs against a level of acceptable risk. The outcome was that the three areas resulted in an unacceptable vulnerability to persons falling from the roof. There is a five-storey drop on the façade side of the barrier and the risk to human health and safety is accordingly both severe and immediate.
- 2.5 The proposed development simply seeks to erect three areas of roof edge protection:
- Area 1 – Balustrade to Euston Road / Euston Square
 - Area 2 – Balustrade to Stephenson Way
 - Area 3 – Installation of level roof access platform
- 2.6 The accompanying drawings display the proposal. Area 1 consists of balustrade being installed to parapet wall to provide 1100mm high railed protection to existing raised platform area. Within Area 2 a new length balustrade will be installed to provide 1100mm high railed protection above finished deck level. Whilst Area 3 proposes to install galvanised steel mesh to form a level platform walkway.

3.0 DESIGN STATEMENT

3.1 As highlighted at all levels of planning policy, design is a vital consideration for new development. Investing in quality develop can significantly contribute to social, economic and environmental improvements to an area. This section of the report sets out to describe and evaluate the following elements of the proposal:

- Use
- Amount
- Layout
- Scale
- Landscaping
- Appearance

Use

3.2 The use of neither the roof nor the building will change as a result of the proposed development. The listed building will remain in an ongoing use commensurate and appropriate with its listing.

Amount

3.3 There proposed development is situated on three areas on the building as outlined in the previous Chapter. The roof edge in each area is capable of accommodating the proposed protection whilst being sensitive to the character of the host building. The form and height of the improved glazed barrier is directly dictated by its function. No proposed installation of balustrade or galvanised steel mesh will exceed what is necessary. The amount of additional edge protection proposed is the minimum to provide safe working conditions at height.

Scale

3.4 Area 1 consists of a new length of balustrade to be installed on parapet wall to provide **1100mm** high railed protection to existing raised platform area. Area 2 consists of a new length of balustrade to be installed to provide **1100mm** high railed protection above finished deck level. Whilst area 3 consists of a galvanised steel mesh level platform access walkway with walkway supports to bear onto existing parapet wall. The galvanised platform will be **2800mm** in width and **24000mm** in length; whilst the walkway

supports will provide **2400mm** high railed protection. The proposed materials match existing roof edge protection in place on the host building. The scale of the proposal is not of a sufficient scale to detract from the character of the area and the Listed Building.

Landscaping

- 3.5 No additional landscaping is proposed.

Appearance

- 3.6 As per other aspects of this application, detailed consideration has been given already to achieving a design solution that is very high quality whilst paying regard to the built environment in the locality of the application site. These details are fully illustrated in the accompanying drawings.
- 3.7 Acknowledging the special nature of the site and its immediate context, the design of the proposal has been careful to keep in with the character and context of the listed building and of the Bloomsbury Conservation Area.
- 3.8 Areas 1 and 2 front the Euston Road and Stephenson Way elevations of 30 Euston Square respectively whereas area 3 would only be viewable from high rise adjacent buildings. Whilst the proposed areas 1 and 2 can be seen from the street level, the balustrade would not be prominent or inherently incongruous; nor would any element interrupt or fetter viewers' experience of the listed building. All elements of the proposal are lightweight and reversible should edge protection legislation or requirements change in the future.

4.0 ACCESS

- 4.1 Accompanying this application is a Hazard Identification Qualitative Risk Assessment and Report completed by Time Consultancy on behalf of the Royal College of General Practitioners. This document outlines areas of risk for staff members when working at height at the College's headquarters.
- 4.2 Paragraph 3.1 identifies 21 areas that pose a potential risk to the human health at 30 Euston Square. Hazards 5.1, 5.10 and 5.13 are the areas that have been included in this application.
- 4.3 Paragraph 4.2 highlights the type collective controls to be implemented including 'guardrails' and 'mobile elevated work platforms' which have been pursued as part of this application. From page 16 each risk is assessed in turn and concludes with a series of actions and recommendations for each area.
- 4.4 The appendices provides a 'Work at Height Track List – Duty Holder Identification' which provides details on each task where working at height is completed. For window cleaning, the task is completed every three months whereas other tasks, such as gutter maintenance, occur every six months.

5.0 HERITAGE STATEMENT

5.1 The proposed development is located on the east and north elevations. It will have minimal effect on these principles elevations whilst not detracting from the heritage features.

5.2 The building was designed by Arthur Beresford Pite circa 1906-1908 for the London Edinburgh and Glasgow Assurance company as purpose-built office accommodation in Greek Revivalist style. It features particular internal detailing which contributed to its Grade II* Listed Building.

Effect on the listed building

5.3 The addition of the proposed roof edge protection will have no effect on the historic or current plan form of the building.

5.4 For the reasons outlined in paragraph 3.8 of this Statement there would be no harm to the building's historic fabric. If the Local Planning Authority takes an alternative view and conclude that this is a level of harm, then it would be "less than substantial" in relation to paragraph 132 of the National Planning Policy Framework. The wider public benefits of protecting human life, as set out in the accompanying Risk Assessment, would clearly outweigh any perceived limited and reversible harm.

5.5 Accordingly, there will be no harm to the building's special historical or architectural interest.

Effect on the character and appearance of the Conservation Area

5.6 The building will retain its mixed-use character and there will be no change to or intensification of the usage of the building as a result of the proposed development.

5.7 The additional roof edge protection will be partially visible from some public viewpoints, however, the angle of the view involved from street level and the extensive presence of large intervening adjacent buildings means that the effect on the Conservation Area is negligible. Any additional visual effect from within other nearby buildings will be barely perceptible, given the small-scale size of the proposal coupled with the lightweight nature of the materials to be used.

- 5.8 Accordingly, the proposed development would preserve the character and appearance of the Conservation Area.

National Planning Policy Framework-compliant heritage assessment

- 5.9 In light of the above commentary, it is clear that the proposed development would cause no harm whatsoever, either “substantial” (NPPF 133) or “less-than-substantial”(NPPF 134). Accordingly, there is no policy impediment to the grant of planning permission and listed building consent.
- 5.10 Bearing in mind the Council’s special duties in the Town & Country Planning Act 1990 (as amended) and the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), there is no legal impediment to the grant of planning permission and listed building consent.

6.0 CONCLUSIONS

- 6.1 The application proposes the erection of safety roof edge protection on three areas of the perimeter of the roof. This is essential to ensure the health and safety of maintenance staff when performing everyday duties.
- 6.2 Material will match existing roof edge protection on the building whilst the scale of the proposed development is not out of proportion with the host building.
- 6.3 There will be no harm to the listed building or to the character and appearance of the Conservation Area.
- 6.4 In light of the above it is respectfully requested that planning permission and listed building consent is issued without delay.



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