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Mr. John Ferguson  
CGMS  
140 London Wall  
London  
EC2Y 5DN

Dear John,

**Re: 93-103 Drummond Street and 63 Cobourg Street, London, NW1 2HJ**

I refer to your request for pre-application advice at the above address for:

Development of 99 student apartments (46 studios, 8 twin and 35 cluster units comprising 107 bed spaces) within a 5-storey building with basement and a commercial unit (241.7sq.m GIA) at basement and ground floor levels fronting Drummond Street.

The comments below are based on the pre-application meeting discussions held on the 21<sup>st</sup> March and 6<sup>th</sup> May 2016 and the revised proposed scheme sent by email on 27<sup>th</sup> May 2016 which include the following:

- Design Statement by CZWG;
- Letter from GVA Schatunowski Brooks dated 12<sup>th</sup> April 2016;
- Drawing BRE/133 – 3D View A showing surrounding VSC pass/fail/non-habitable;
- Drawing BRE/134 – 3D View B showing surrounding VSC pass/fail/non-habitable;
- Drawing BRE/135 – 3D View C showing surrounding VSC pass/fail/non-habitable;
- Drawing BRE/136 – 3D View D showing surrounding VSC pass/fail/non-habitable; and
- BRE Daylight Analysis Cutback dated 25<sup>th</sup> January 2016.

This letter sets out a detailed note of the principal issues regarding the proposal.

## Site Description

The site is located within an urban block adjacent to Euston Station and forms part of the area identified for the redevelopment of Euston Station following the Government announcement of the preferred route for High Speed 2 (HS2). It is bounded by Drummond Street to the north, Melton Street to the east, Euston Street to the south and Cobourg Street to the west and has a prominent corner presence at the junction of Drummond Street and Cobourg Street with frontages on both streets.

The present buildings on the site are 2 to 3 storeys in height on Drummond Street, with a large double height space covered by an extensive pitched roof in the middle of the block. They were historically used as a car garage, dealership and petrol station and have since been converted into a retail space currently occupied by a specialist camera retailer. The corner of Drummond Street and Cobourg Street is unbuilt and the former petrol station forecourt is currently used as a car park.

There is also a basement over the whole of the site. Public access into the buildings is currently from the Drummond Street frontage. There is service access via the old petrol station forecourt and via a passage way under the residential properties on Euston Street. The perimeter of the rest of the block has buildings of varying scale and uses.

On the corner of Melton Street and Drummond Street, sharing a boundary with the site, is the 3-storey locally listed former Charing Cross and Hampstead Railway (CCHR) Underground Station with its glazed terracotta arched façade. Adjacent on Melton Street (Nos. 14 and 15) is a pair of Grade 2 listed Georgian 3-storey houses, with basements, rendered façades and rusticated bases at ground floor level.

On the corner of Melton Street and Euston Street is a recently refurbished 4-storey early 1960's office building, with a basement currently used in part as a furniture showroom. Along Euston Street is a pair of recently built 3-storey small office buildings (Nos. 54 and 56) with basements. Adjacent to Nos. 54 and 56 is a terrace of 4 x 3-storey houses (Nos. 58, 60, 62 and 64).

At the corner of Euston Street and Cobourg Street is a 3-storey 1930's public house (The Bree Louise Pub) built in brick, with a high chimney at the corner, and a steep pitched roof. Adjoining the public house along Cobourg Street are 4 early Victorian locally listed terraced houses (Nos. 59 to 67) which have been converted into flats. One of the houses spans across the ground floor access way which also provides service access into the site.

Surrounding the site are buildings of larger scale such as the Ibis Hotel directly opposite on the north side of Drummond Street. This is a primarily brick building with extensive mansards disguising the upper part of accommodation and plant. The hotel has 5 storeys onto Drummond Street rising to 5/7 towards Melton Street. To the south along Euston Street the buildings vary from 3 to 5 storeys.

On the western side of Cobourg Street is a 1960's telephone exchange with a 3 storey block façade in large precast concrete panels.

The immediate surrounding context is made up of buildings of varied periods, use and scale with taller larger buildings, particularly to the south east and west.

The site is not within a conservation area and there are no statutorily or locally listed buildings on the site.

The site is highly accessible by public transport and has a PTAL of 6b (the highest level).

### **Proposal**

The proposal is described above.

The proposal would be accessed from Drummond Street and would include plant, refuse and cycle store areas at basement level with a covered courtyard and walkway area to the rear of the building, accessed from both Drummond Street and Coburg Street.

### **Planning Policy**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that developments must be determined in accordance with the development plan unless material considerations indicate otherwise.

The documents which make up the development plan are the London Plan and the London Borough of Camden's Local Development Framework (LDF). There are a number of documents making up the LDF, but those primarily of concern in this instance are the Core Strategy (2010) and the Development Policies (2010). Other documents which are of relevance include the Proposals Map and the Camden Planning Guidance (CPG).

The National Planning Policy Framework (NPPF) is also an important consideration. A list of relevant policies is provided below.

### **Relevant Policies**

#### **The London Plan (March 2016)**

- 3.3 Housing Choice
- 5.2 Minimising Carbon Dioxide Emission
- 5.3 Sustainable Design and Construction;
- 5.6 Decentralised Energy Networks;
- 5.7 Renewable Energy.
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.8 Heritage assets and archaeology
- 8.2 Planning obligations

## **LDF Core Strategy (2011)**

- CS1 Distribution of growth
- CS3 Other highly accessible areas
- CS4 Areas of more limited change
- CS5 Managing the impact of growth and development
- CS6 Providing quality homes
- CS7 Promoting Camden's centres and shops
- CS8 Promoting a successful and inclusive Camden economy
- CS9 Achieving a successful Central London
- 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
- CS17 Making Camden a safer place
- CS18 Dealing with our waste and encouraging recycling
- CS19 Delivering and monitoring the Core Strategy

## **Development Policies DPD (2011)**

- DP1 Mixed use development
- DP2 Making full use of Camden's capacity for housing
- DP3 Affordable Housing
- DP5 Homes of different sizes
- DP6 Lifetime Homes & Wheelchair Housing
- DP9 Student housing, bedsits and other housing with shared facilities
- DP10 Helping & promoting small and independent shops
- DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses
- DP15 Community and leisure uses
- DP16 The transport implications of development
- DP17 Walking, cycling and public transport
- DP18 Parking standards and 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 Basement and Lightwells
- DP28 Noise and vibration
- DP29 Improving access
- DP30 Shopfronts
- DP31 Open space and outdoor recreation
- DP32 Air Quality

## **Camden Planning Guidance (updated 2013 and 2015)**

CPG1 Design  
CPG2 Housing  
CPG3 Sustainability  
CPG4 Basements and Lightwells  
CPG6 Amenity  
CPG7 Transport  
CPG8 Planning Obligations

### **Other relevant documents**

#### **Euston Area Plan (Adopted January, 2015)**

### **Considerations**

The following issues are material considerations with regards to your proposal:

- Principle of land use
- Design and scale
- Standard of accommodation
- Basement construction
- Residential amenity
- Sustainability
- Transport
- Refuse and Recycling
- Security
- Conclusion
- Community Infrastructure Levy
- S106 legal agreement
- Planning application process and supporting information

### **Principle of land use**

No objection is raised to the loss of the existing retail use and the re-development of the site for student housing. Policies CS6 and DP9 support the development of student housing subject to a number of criteria, including where:

- It will not involve the loss of permanent self-contained homes;
- It does not prejudice the supply of self-contained homes, affordable housing and homes for vulnerable and older people;
- It complies with relevant houses in multiple occupation (HMO) standards;
- It is accessible to public transport, higher education institutions, shops, services and community facilities; and
- It contributes to mixed and inclusive communities.

Policy DP9 advises that student housing development should also:

- serve higher education institutions in Camden or adjoining boroughs;
- be located where it is accessible to the institution it serves; and
- include a range of unit layouts including units with shared facilities.

CPG2 further advises that the Council will resist proposals for student housing developments that would prevent the Council's target for delivery of 437 additional self-contained homes per year being met. The Council will consider the suitability of any site for alternative housing, particularly if it has been identified as one which is suitable for affordable housing or housing for older or vulnerable people. In this consideration, the Council will have regard to the Camden Site Allocations Document; and extant planning permissions that have already secured permanent Class C3 accommodation.

In considering the location of student housing schemes, the Council will have regard to:

- existing concentrations of student accommodation in the area as a proportion of the overall population;
- the wider housing mix in the community; and
- the impact on residential amenity in the area.

The proposed student accommodation would be acceptable in principle on the site subject to the above criteria being met and any planning application submitted providing clear justification for student housing in accordance with the above Camden policies and guidance.

Camden is home to 11 Higher Education Funding Council for England (HEFCE) Institutions as listed in Appendix C of CPG2. Where the proposed student housing is not formally tied into a HEFCE funded institution by way of a nomination agreement for example, than Policy DP1 would apply requiring a mixed use scheme with 50% self-contained housing as part of the proposed scheme.

It has been confirmed that the proposed student housing would be for universities in the borough or across London and this would be secured by way of S106 legal agreement.

### **Design and scale**

The NPPF (paragraphs 56 and 57), the London Plan (Policies 7.1 to 7.8) and Camden's Core Strategy (Policies CS14, CS17), Development Policies (DP24) and Camden Planning Guidance 1 (CPG1) place great emphasis on the importance of good design. CPG1 seeks "excellence in design" in Camden. Policy at all levels requires buildings, streets and spaces to respond in a manner which promotes inclusive and sustainable development and contributes positively to the relationship between urban and natural environments and the general character of the location.

The NPPF also states that, in determining planning applications where heritage assets are involved, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, as

well as the desirability of new development making a positive contribution to local character and distinctiveness. The London Plan also requires, at Policy 7.8, that development affecting heritage assets conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Camden Policy DP25 also seeks to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

The existing building is neither statutorily nor locally listed and does not fall within a conservation area. The block comprising of frontages onto Melton Street, Drummond Street, Cobourg Street and Euston Street, of which the site forms part of, is also formed by a number of buildings which are listed as heritage assets. These include the following:

#### Grade 2 Listed Buildings

- Nos. 14-16 Melton Street.

#### Locally Listed Buildings

- Nos. 16-17 Melton Street.
- Nos. 59-67 Cobourg Street.
- No.69 Cobourg Street (Bree Louise Public House).

These buildings are considered to contribute positively to the character and appearance of the local townscape which is relatively cohesive in terms of its prevailing heights, architectural forms and townscape character.

Given the existing building is outside a conservation area and of limited architectural merit, no objection is raised to its demolition subject to a suitable replacement being agreed.

The proposed building would re-instate the north-west corner of the urban block. On the Drummond Street elevation the building would be aligned with the footprint of the CCHR railway station building. The junction between the new building and the 19<sup>th</sup> century terrace at Nos. 59 to 67 Cobourg Street would feature a setback in the built form so as to frame the terrace. The proposed building would be arranged as two distinct but interconnecting parts - one facing Drummond Street and Cobourg Street, the other in two wings within the central part of the block.

The main entrance into the student housing section of the building would be located on the corner of Drummond Street and Cobourg Street leading to a central lift core with lifts accessing the residential accommodation on the upper floors. Secondary access into the building would also be provided via the existing passageway under the houses in Cobourg Street. An active street frontage onto Drummond Street would be maintained with a new ground floor retail unit extending into the basement and accessed directly from the street.

The central part of the building would be connected at ground floor with the main entrance on Drummond Street and with its own dedicated core. The accommodation would be arranged in two wings separated by a central open courtyard roughly on an axis with the passage way from Cobourg Street. The studio rooms would be accessed via the external walkways. The walkways have been designed to allow the

maximum natural light to reach the courtyard.

The elevations facing the courtyard would be almost entirely glazed and on the southern side angled in such a way as to minimise the overlooking across the courtyard. The alternate undulation on different floors creates an articulated façade within the courtyard.

The proposed building would sit comfortably within its surroundings. Fronting onto Drummond and Cobourg Streets, it would be similar in scale to the Ibis hotel building opposite. The front elevation on Cobourg Street would step back adjacent to the existing terraced frontage on Cobourg Street to frame and maintain the visual prominence of these heritage assets. The main street frontages, in terms of their materiality, are considered to respond positively to their surrounding context, with brick used for the main body of the building and a stone finish for the setback upper storey. A shift in the size of window openings of the upper storeys of the main body of the building facing Drummond Street and Cobourg Street, along with false windows on the visible sections of flank walls provides an appropriate proportion of solid to void and visual interest within street views.

### **Standard of accommodation**

The proposed student accommodation would be arranged either in cluster apartments with communal facilities, or studio apartments with integral kitchenettes. The cluster apartments would be located within the parts facing Drummond Street and Cobourg Street, whilst the studios are primarily in the two wings in the central part of the block.

CPG2 requires 10% of student bedrooms to be wheelchair accessible. 10 out of the 99 apartments are designed to be suitable for wheelchair users. All apartments are accessible to wheelchair visitors.

The student accommodation would provide a satisfactory standard of accommodation for future occupiers in terms of light, privacy, outlook and amenity space. It has been designed to comply with Camden's guidance for HMOs and policy DP9 and CPG1, in particular chapter 3, which are both relevant to student housing. Each of the units would provide a satisfactory floorspace for individual bedrooms and the apartments as a whole. The accommodation would make an efficient use of the space and would have access to suitable refuse storage facilities and secure bicycle parking facilities.

### **Basement construction**

Policy DP27 and Guidance CPG4 set out how planning applications that include proposals for new or extensions to basements will be assessed. The proposal includes a single storey basement below the site. The site currently has a basement albeit with a smaller footprint. A Basement Impact Assessment (BIA) should be submitted as part of any future application, which assesses the potential impact on land stability and groundwater flow.

A condition would be attached to any permission granted requiring the appointment



of a qualified chartered engineer with membership of the appropriate professional body to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Compliance with the BIA would be secured by S106 legal agreement.

London Underground Limited should also be consulted on the proposal as the underground is likely to run close to the site. They may request that a condition be attached to any permission granted requiring the submission of method statements for the works.

### **Residential Amenity**

Policies CS5, DP26 and CPG6 also require that the amenity impact on neighbouring properties be fully considered. Policy DP26 seeks to ensure that the amenity of occupiers of neighbouring properties is protected. It states that planning permission will not be granted for development that causes harm to the amenity of occupiers and neighbours in terms of loss of daylight, sunlight, outlook and privacy.

Any planning application submitted would need to be accompanied by a BRE Sunlight and Daylight Assessment that considers the impact on the Average Daylight Factor (ADF) and Vertical Sky Component (VSC) measurements to neighbouring sensitive dwellings in accordance with the Building Research Establishment's 'Site layout planning for daylight and sunlight: A guide to good practice' (BRE Guide), and as advised by CPG6 (Chapter 6). A Noise Assessment would also need to be submitted. The assessments would need to fully consider the impact of the proposals on existing neighbouring residential properties in Coburg Street, Euston Street and Melton Street together with the impact of traffic and railway noise on future occupiers and their access to light.

Four drawings have been provided with the submission which are window maps of the elevations to the rear of the proposal. Drawing BRE/133 shows the rear elevation of the existing neighbouring properties on Coburg Street, BRE/134 the rear elevation of Euston Street and BRE/135 and BRE/136 the rear elevation of Melton Street. Highlighted in red are the existing windows that fail the VSC 20% reduction test, green are those that pass and the cyan (blue) colour are rooms that have been identified as non-habitable.

There are 5 existing windows in Coburg Street that technically fail the 20% test (windows W210, W140 and W160). These do not, however, have existing high levels of daylighting and the actual reduction of VSC appears to be small albeit a higher percentage than 20% of the original figure. The ADF figures adjacent to the VSC loss in the tables supplied also show that there is non-compliant daylight in the rooms in the first instance and as a consequence the occupiers would be using artificial light the whole time, regardless of the proposed development. The remaining 4 windows would all pass the 20% test with 1 window (W1/10) seeing an improvement in light.

Turning to Euston Street on drawing BRE/134, there are two windows, W1/71 which is only marginally over the 20% reduction level and W1/100 which is adjacent to a large window in the same room which fully complies with the 20% test. On drawing

BRE/135 there is one window W1/150 which would experience a loss in excess of 20% but again from a relatively low existing VSC level.

The above results of the Daylight and Sunlight analysis undertaken appear to demonstrate that the proposal satisfies the requirements set out in the BRE Guidelines and the proposed development will have a low impact on the light received by neighbouring properties which would still retain adequate daylight and sunlight amenity having regard to the dense urban environment.

With respect to outlook and privacy, the proposal has been carefully designed to minimise its impact on existing neighbouring properties. At its closest point to existing properties on Euston Road and Melton Street, the proposal would be single storey and at its closest point to properties on Coburg Street the proposal would be two-storey. There would be no windows within these elevations directly facing the boundaries and the design, scale and positioning of the proposed building would ensure that satisfactory outlook and privacy to existing neighbouring residential properties would be maintained.

An Air Quality Assessment will also need to be provided given the site's location on a busy, urban street junction and living spaces and bedroom windows being proposed that face directly onto the street. The assessment should set out full details of any mechanical ventilation required and assess air quality for future occupiers.

A Student Management Plan will also be required as part of any planning application submitted setting out full details of how the accommodation would be managed to minimise the impact on the amenities of neighbouring properties.

### **Sustainability**

The London Plan policy requires major developments to achieve 35% reduction in CO<sub>2</sub> emissions beyond the Part L 2013 building regulations by following the energy hierarchy. Any emissions that cannot be met on-site can be offset through a financial contribution to secure delivery of carbon dioxide savings in the borough. The contribution is currently calculated at £2,700 per tonne (over 30 years). From October 2016, the contribution figure is to be changed to £1,800 per tonne of carbon (over 30 years) as per the figure tested for the London Plan's Viability Assessment.

Policy CS13 further requires 20% reduction in CO<sub>2</sub> emissions through renewable energy. Policy DP22 also 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. 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. The Council's sustainability requirements set out in CPG3 (Sustainability) should be complied with.

Any formal planning application would require an energy and sustainability statement to demonstrate how the proposals could meet the requirements of the Council and the London Plan.

The proposal would be required to meet BREEAM Multi Residential Scheme 'Excellent'. The potential to connect to a decentralised local energy network, such as Netley School (Regents Park) or High Speed 2 (HS2) would also need to be explored. This would be secured by S106 legal agreement, with a requirement that evidence of a final BREEAM Certificate being issued prior to occupation, in a sustainability plan requirement. An energy efficiency and renewable energy plan is also considered to be appropriate to be secured by S106.

Please see our website for further information:

<http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/sustainability-statements-design-and-construction/>

With respect to nature conservation and biodiversity, as this is a major development, the submission of an ecology scoping statement and a protected species survey will be required unless otherwise agreed with the Council's Sustainability Officer.

The Council will also require the development to reduce the pressure on the combined sewer network and the risk of flooding by sustainable urban drainage systems (SUDS). The volume and rate of run-off from heavy rainfall can be reduced through the use of SUDS including green and brown roofs, pervious paving and detention ponds or tanks. A Surface Water Drainage Pro- forma ([found here](#)) will need to be submitted as part of any application. SUDS strategies should be designed in accordance with NPPF policy (and written Ministerial Statement) and London Plan policy 5.13 (SUDS hierarchy) to reduce run-off rates to greenfield rates. Where reasonably practicable, run off volumes should be constrained to greenfield run off volumes for the 1 in 100 year 6 hour event.

## **Transport**

Policies DP16, DP17, DP18 and CPG7 are relevant with regards to transport and highways issues.

### **Car Parking**

The site has a PTAL of 6b and is well served by public transport being located within walking distance of Euston and Kings Cross underground and overground stations and within close proximity to local bus stops. In order to ensure that staff, visitors and occupiers of the proposal do not contribute to parking stress or add to existing traffic and environmental problems in the local area (e.g. traffic congestion, road safety and air quality), the development would be secured as 'car free' through a S106 legal agreement.

### **Cycle Parking**

Policy DP18 of the LDF Development Policies requires developments to sufficiently provide for the needs of cyclists and it would ideal for the student accommodation to aspire to these standards. Camden's minimum cycle parking standards are contained in Appendix 2 of the Camden Development Policies

document. The London Plan also provides guidance on minimum cycle parking standards and these are outlined in Table 6.3.

The proposal would provide a secure cycle store at basement level, accessed by a lift to the rear from both Coburg Street and Drummond Street. The principle of cycle parking in the basement is considered to be acceptable providing a ramp at a gradient of 1:20 is provided and the lifts are designed to be 2m x 2m to allow sufficient space for bike access. You should also ensure that there is enough room in the cycle stores to manoeuvre bicycles efficiently. Details of the cycle parking facilities, access routes and cycle store would need to comply with the guidance provided within CPG7 and should be submitted to Transport Strategy for consideration. CPG7 is available on the Council's website at the hyperlink below:

<http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

### Travel Plan

Policies CS11, CS19 and DP16 seek to promote sustainable development and ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links with appropriate mitigation measures in place.

Such a Travel Plan should set out measures to promote the use of sustainable transport by future visitors and workers within the development. This would be updated by the developer or student accommodation and commercial use operators on a regular basis if the development were built and occupied, with travel surveys of staff and visitors being carried out in the first, third and fifth year of occupation. A draft Travel Plan should be submitted with the application. A final Travel Plan would be secured along with a monitoring and administration contribution of £6,020.

### Management of Construction Impacts on the Public Highway in the local area

Policy DP20 states that Construction Management Plans (CMP) should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Policy DP21 relates to how a development is connected to the highway network. For some development this may require control over how the development is implemented (including demolition and construction) through a CMP.

The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A CMP would need to be secured by way of a Section 106 legal agreement for this development and a draft document would be required on submission. Please use the link for the Council's pro forma:

[http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset\\_id=3418568](http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3418568)

## Highway works

The summary page of policy DP21 states that ‘the Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development’. The footway directly adjacent to the site on Coburg Street and Drummond Road could be damaged as a direct result of the proposed works.

The Council would therefore need to secure a financial contribution for highway works by way of a Section 106 legal agreement if planning permission is granted. A quote of the works will not be requested until the submission of a formal planning application.

## **Refuse and recycling**

Policies CS18 and CPG1 are relevant with regards to refuse and recycling storage. Any future application should fully detail where refuse and recycling would be stored and what the strategy would be for collection. This would be set out within a Delivery and Servicing Management Plan.

Refuse storage areas are provided for both the commercial and student accommodation parts of the proposal at basement and ground floor levels as shown on the drawings submitted.

You are advised to discuss refuse store arrangements with Ann Baker in the Environmental Services Section (Ann.Baker@Camden.gov.uk or 020 7974 8998). Separate recycling storage areas should also be provided.

## **Security**

Policy CS17 and CPG1 (Design) are relevant with regards to secure by design. It would need to be demonstrated as part of any future application that the proposal was safe and secure and met the requirements of ‘Secured by Design’. It is recommended that guidance be obtained from the Metropolitan Police Crime Prevention Design Advisor prior to any planning application being submitted.

## **Conclusion**

The principle of a mixed use commercial and student housing development on the site is supported within this sustainable location close to local services and amenities. The student accommodation would provide a satisfactory standard of accommodation for future occupiers.

The proposed design of the development would sit comfortably with its surroundings and would be an enhancement to the streetscene. The overall scale of the proposed building is considered to be acceptable and would not appear overly dominant. Any planning application submitted would need to demonstrate that the proposal would have no adverse impact on residential amenity and highway safety as set out above.

## **Community Infrastructure Levy (CIL)**

The proposal by its size and land use type will be liable for the London Borough of Camden's Community Infrastructure Levy (CIL) introduced on the 1<sup>st</sup> April 2015 to help pay for local infrastructure and the Mayoral CIL which helps fund Crossrail introduced on 1st April 2012. Further details on CIL and how it is charged can be found on our website:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/community-infrastructure-levy/>

The Mayoral CIL charge would be £50 per sq.m for the student housing accommodation floorspace. As the development is within Camden 'Zone A', the Camden CIL charges would be £175 per sq.m for the student housing accommodation element of the proposal.

## **S106 Obligations**

In accordance with CPG8, which provides more detail in relation to the thresholds and calculations for contributions, and as referred to above, the following matters would need to be secured by S106 legal agreement in any planning permission granted:

- The proposed Student Housing being formally tied in to a Higher Education Funding Council for England Institution by way of a nomination agreement so that Policy DP1 does not apply requiring a mixed use scheme with 50% self-contained housing;
- Delivery and Service Management Plan;
- Demolition and Construction Management Plan;
- 'Car Free' development;
- Local employment and apprenticeships agreement and a local procurement code;
- Energy efficiency and renewable energy plan and Sustainability plan to secure compliance with BREEAM Multi Residential Scheme 'Excellent and connection to a decentralised local energy network (future proof for connection and exploring the possibility of connecting to Netley School (Regents Park) and HS2 being secured;
- Student Management Plan;
- Highways Contribution to cover any repair works and improvements to the local highway required; and
- Travel Plan including monitoring fee of £6020.
- Basement Impact Assessment compliance.

## **Planning application process and supporting information**

In the event of submitting a full planning application, please ensure that you submit all the required information in accordance with the validation checklist, details of which can be obtained from the council's website:

<http://camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application.>

In order to ensure your application is valid, the following information will be required to support the planning application:

- Completed and signed planning application forms for Full Planning Permission;
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Design and Access Statement;
- Heritage Statement;
- Planning Statement;
- Student Management Plan;
- Draft Construction Management Plan - [pro forma](#);
- Sustainability Statement;
- Energy Statement;
- Ecology scoping statement and a protected species survey (or justification for why they aren't required);
- Crime impact assessment;
- Daylight and sunlight assessment;
- Noise Assessment (by an acoustic engineer);
- Surface Water Drainage Pro-forma;
- Transport Assessment;
- Landscaping plan;
- Air Quality Assessment;
- Waste storage and collection plan; and
- The appropriate fee – (dependent on level of floorspace/number of units proposed).
- Basement Impact Assessment.

**Please note that the information contained in this letter represents officer opinion and expressed without prejudice to the formal consideration by the Council.**

I trust this information is helpful. Should you have any further queries please contact me.

It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete one of our [surveys](#). We will use the information you give us to monitor and improve our services.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Michael Cassidy  
Principal Planning Officer