

PLANNING STATEMENT

In respect of

**93-103 DRUMMOND STREET
EUSTON, NW1 2HJ**

On behalf of

CANFIELD FREEHOLD LIMITED

RPS CgMs Ref: 18949

September 2016

QUALITY MANAGEMENT

Prepared by:	Lotte Hirst
Authorised by:	John Ferguson
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APPENDIX 1: PRE-APPLICATION ADVICE DATED 5TH SEPTEMBER 2016

1 INTRODUCTION

- 1.1 This statement is prepared on behalf of our client, Canfield Freehold Limited, to accompany the planning application for a change of use, altered roof configuration and insertion of a mezzanine floor at the site addressed 93 – 103 Drummond Street, Euston, NW1 2HJ, ‘the site’.
- 1.2 Built form on site comprises a part 2 and part 3 storey building of irregular layout that is currently in a blend of different uses including office, warehouse and storage and retail floorspace. Planning permission is sought for the change of use of the building to offices (Use Class B1a) as well as the reconfiguration of the building to allow for the insertion of a mezzanine floor. A planning application for the change of use of the site is currently pending (reference 2016/3599/P), due for determination on the 28th September 2016.
- 1.3 The site falls within the HS2 safeguarded area and would be subject to compulsory purchase by HS2 Limited should the scheme go ahead. As part of the compulsory purchase negotiations with HS2, Canfield Freehold Limited are exploring alternative uses for the site (in the event HS2 did not go ahead), and are seeking planning permission for the conversion of the site to office use, along with the reconfiguration of the building. In the event of HS2 not proceeding or being delayed, these proposals will be implemented.
- 1.4 Pre-application advice has previously been sought on the redevelopment of the site for a student residential led mixed use scheme with commercial floorspace at ground floor. Pre-application discussions have been ongoing since May 2015, with the most recent pre-application meeting held on 22nd March 2016. Written pre-application advice was issued by Planning Officer Michael Cassidy on the 5th September, confirming that there is no conflict with policy and the LPA could support a change of use (included at Appendix 1).
- 1.5 Section 2.0 of this statement sets out the context of the application site. The development proposal is detailed in Section 3.0, followed by details of the planning history at section 4.0. Section 5.0 assesses the relevant planning policy and Section 6.0 summarises and concludes that the proposed development complies with relevant adopted policy.

2 SITE AND SURROUNDING AREA

Description of Site

- 2.1 The site is located in a prominent position at the junction of Drummond Street and Cobourg Street. The development site covers No. 93-103 Drummond Street which is currently in commercial use and under tenancy of Calumet Photography.
- 2.2 Built form on the site comprises a part 2 and part 3 storey building of irregular layout. A small parking area is provided at the most north-western point of the site with the building set back from Cobourg Street but with active frontage at Drummond Street. Building heights in the immediate area vary from equivalent of 2-6 storeys with building heights becoming higher as you move closer to Euston Station.
- 2.3 Drummond Street provides for a busy thoroughfare to Euston Station which is a major transport hub in the area. Further to this, the site is located only a short walk from Drummond Street Neighbourhood Centre. To this effect, a mix of uses surround the site including retail, commercial, leisure and residential with numerous local services inter-dispersed.
- 2.4 The site is highly accessible with a PTAL rating of 6b. A wide variety of bus stops are in close proximity at Hampstead Road and Euston Road whilst regular underground services and mainline trains are provided at Euston Station, Euston Square and Warren Street all within 600m of the site.
- 2.5 There is further an array of public open spaces in the wider vicinity of the site including St James's Gardens, Euston Square Gardens, Fitzroy Square Garden and Russell Square.

Heritage Considerations

- 2.6 The site does not comprise any locally or statutorily Listed Buildings and is not within a Conservation Area; however Bloomsbury Conservation Area is located to the south. The closest listed building is 14-15 Melton Street to the immediate northeast of the site. In addition, numbers 16 – 17 Melton Street are locally listed. The scope of the planning application is limited and there is no significant increase in bulk, scale or massing, however, owing to the façade changes and minor reconfiguration, a Heritage Statement has been prepared to accompany the application.
- 2.7 It has been found that the bulk, scale and massing of the Site's development proposals will be in keeping with the adjacent Grade II listed 14-15 Melton Street and, when appreciating this designated heritage asset in the public realm, there will be no negative effects upon its setting and significance.
- 2.8 There will also be no negative effects upon the setting and significance of the non-designated heritage assets that abut the Site boundary as the development proposals will be to a consistent form, scale and massing, along with a suitable palette of materials, that will remain subservient to these non-designated heritage assets. This will consequently ensure that their local landmark status is preserved, with no harm or loss to their respective setting and significance.

3 PLANNING HISTORY

- 3.1 Planning consent was approved on 27th September 1989, LPA ref. PL/8800589/R3, for, 'the redevelopment of the site by the erection of a four storey (plus basement) building for a mixed use, comprising showroom with light industrial use and ancillary office and storage space as shown on drawing numbers L88/194/01 02 03 04A 05A & 08 revised by letters dated 13th February 1989 22nd March 1989 and 5th May 1989 and revised drawing number L88/194/09 received on 3rd August 1989 with amended cill heights and letter dated 20th September 1989'. This consent allowed for the construction of a four storey building plus basement, however was not implemented.
- 3.2 In terms of recent planning history, an application for the change of use of the building from the existing mixed use (including B1a office, B1c workshop, B8 storage and A1 retail) to Offices (Use Class B1a) is currently pending, due for determination of 28th September 2016. The LPA reference number for this application is 2016/3599/P.

4 DEVELOPMENT PROPOSALS

- 4.1 Currently, the building comprises a range of uses including office, warehouse, workshop and retail space, used in association with a camera and photography business. A planning application is currently pending for the change of use of the site to Use Class B1a office (reference 2016/3599/P), due for determination on the 28th September 2016.

Change of Use

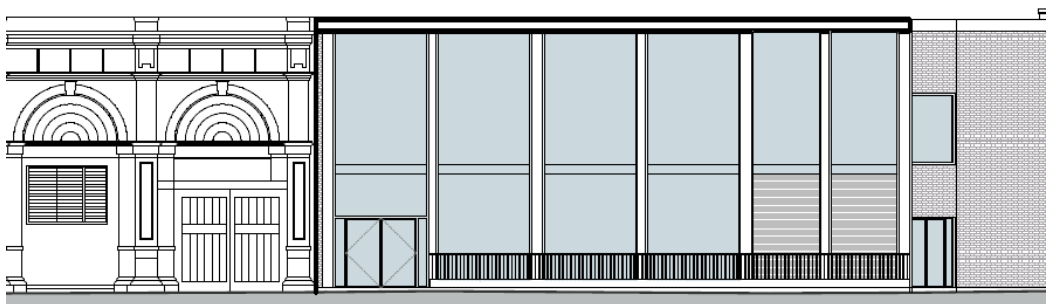
- 4.2 In terms of the proportions of the existing uses, the building is used predominantly for purposes falling in 'B' Class uses, including Use Class B1(a) Office, Use Class B1(c) Light Industrial (workshops) and Use Class B8 Storage and Distribution (warehouse), accounting for 80% of floor area. Retail space accounts for 20% of the site. Overall, the use of the building is considered to be sui generis.
- 4.3 The proposal seeks permission for the conversion of all floor area to use class B1a. It is of note at this stage that the principle of the loss of the current use has been assessed against adopted policy as part of the existing pre-application enquiry. Written feedback from Planning Officer Michal Cassidy, dated 5th September 2016, notes '*No objection is raised to the loss of the existing retail use and the re-development of the site for student housing*' (Appendix 1). Whilst it is acknowledged that the proposed redevelopment is for student accommodation, the policy against which the loss of the existing use should be assessed remains the same.
- 4.4 The proposal seeks planning permission for the conversion of the total floor area, extending to 1,774sqm of mixed uses, as described above, to Offices(Use Class B1a). The additional floor area created by the insertion of the mezzanine will result in the addition of 352.55 sqm, therefore the overall office floor area at the site will be of 2,126.55 sqm GIA.

Reconfiguration of Roof Profile

- 4.5 The existing building at the site comprises part two storey and part three storey sections and the scheme proposes to alter the roof profile to create a consistent two storey ridge. The three storey element of the building is a tower on the north west corner that will be removed and the shallow pitch roof will be reconfigured and raised to a flat roof. Alterations to the roof will facilitate the insertion of a mezzanine floor area providing additional office space at first floor level. The amended roof profile will create a continuous ridge line from the neighbouring building, 16-17 Melton Street. The plans included overleaf illustrate the comparison between the existing and proposed front elevation facing onto Drummond Street.



Existing north elevation



Proposed north elevation

Alterations to building Façade

- 4.6 Scheme proposals include plans to upgrade the elevational treatments of the building, creating a high quality, contemporary façade with a contrasting yet complimentary material finish to surrounding buildings. The aesthetic of the existing building is poor, with mixed heights, roof profiles and materials, such that the building is currently an incongruous feature within the setting, particularly given the three storey 'tower' feature. By regularising the height and material finish of the building, the street scene will be more consistent and visually pleasing. The use of glazing panels will create high quality finish resulting in a building that has a positive impact on the surrounding area.
- 4.7 Overall, the alterations to the building will result in a reduction in overall height, limited uplift in bulk and scale, an amended roof profile consistent with neighbouring buildings, and an enhanced visual appearance, representing a significant improvement to the street scene.

5 PLANNING ASSESSMENT

5.1 Section 38(6) of the 2004 Planning and Compulsory Purchase Act requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. As such, the statutory development plan for the application site consists of:

- The London Plan Further Alterations (FALP March 2015);
- LB Camden Core Strategy (November 2010);
- LB Camden Development Policies Document (November 2010);

5.2 Furthermore, the following supporting documents published nationally and locally, comprise a material consideration in determining planning applications:

- The National Planning Policy Framework adopted in 2012
- Camden Planning Guidance adopted in 2011

5.3 Of further importance is the Euston Area Plan which was adopted in January 2015. Jointly prepared between Camden Council, the Greater London Authority (GLA) and Transport for London (TfL) the document has been devised to provide a long term planning framework to guide development up until 2031.

Emerging Planning Policy

5.4 Camden Council is currently reviewing their overarching and development management planning policies which will be captured within the Draft Camden Local Plan. The document is out to public consultation with Camden inviting comments on the content of the plan up until 17th April 2015. It should be noted that the Camden Local Plan will replace the Council's current Core Strategy and development Policies planning documents (adopted November 2010) and will cover the period from 2016 – 2031.

Site Allocation

5.5 The application site, 93-103 Drummond Street, is located within the boundary of the Euston Growth Area and Central London Area (Clear Zone Region) as outlined in the adopted Camden Planning Proposals Map. Beyond this the site falls within a designated view, i.e. 5A.2 Greenwich Park Wolfe statue to Tower Bridge – Right Lateral Assessment Area.

5.6 The site falls within the 'Drummond street and Hampstead Road' Character Area in the Euston Area Plan with the area described as below:

5.7 *'The Drummond Street area has a well preserved grid of historic regency terraces containing a mix of residential and commercial uses within a tight-knit historic urban grain. It has a vibrant, distinctive character, and Drummond Street itself is recognised for its specialist ethnic shops and restaurants. To the north of the Drummond Street area, St James's Gardens is a historic open*

space that contains the Grade II listed structures that relate to its history as a burial ground and the National Temperance Hospital which has local heritage value. Hampstead Road forms the western boundary to this sub-area, and provides an important north-south route between Euston Road and Mornington Crescent/ Camden Town and a strategic route between the north of the borough and central London'.

5.8 The site is also safeguarded for High Speed 2.

Principle of Loss of Current Use

5.9 The National Planning Policy Framework (the Framework) was published on 27 March 2012 setting out the Government's planning policies for England and how these are expected to be applied. It has been created to provide a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities.

5.10 Paragraph 22 of the Framework states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

5.11 The Camden Core Strategy Policy CS8 seeks to ensure that the borough retains a strong economy and states that *"the Council will support Camden's industries by safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers."*

5.12 Policy DP13 provides more detailed information as to how the aims of Core Strategy Policy CS8 will be implemented and sets out the Council's policy on employment premises and sites. It is stated that *"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 or building is no longer suitable for its existing business use; and

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

5.13 Policy CS8 goes on to say the Council will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use. This will help to provide premises for new and expanding businesses, support the Central London economy and secure job opportunities for local people who may have difficulties finding alternative work.

5.14 The Camden Core Strategy Policy CS7 states that the Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors by various means, including protecting and promoting small and independent shops, and resisting the loss of shops where this would cause harm to the character and function of a centre.

- 5.15 Camden Development Plan Policy DP12 - Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses states the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. Town centre uses include shops and markets (Use Class A1), financial and professional services (A2), cafes and restaurants (A3), drinking establishments (A4), hot food takeaways (A5), offices (B1a), hotels (C1), community uses (D1), including neighbourhood police facilities, leisure uses (D2), and a number of other uses not in any use class.
- 5.16 Camden Planning Guidance 5 – Town Centres, Retail and Employment states Central London Frontages have an important retail function and planning permission will not be granted for the net loss of retail (Use Class A1) floorspace where it will damage the character and function of a Central London Frontage in line with Policy DP12 in Camden Development Policies. The site is not a 'Central London Frontage'.
- 5.17 Policy DP 10 of the Development Policies plan states that the Council will seek to protect shops outside centres by only granting planning permission for development that involves a net loss of shop floorspace outside designated centres provided that:
- alternative provision is available within 5-10 minutes' walking distance;
 - there is clear evidence that the current use is not viable; and
 - within the Central London Area, the development positively contributes to local character, function, viability and amenity.

Assessment of Loss of Current Use

- 5.18 The current use of the site comprises a mix of uses including office, workshop, warehouse, storage and retail space, although the predominant uses fall within 'B Class' uses (77% of floor area). As the site comprises a blend of uses, the site falls within sui generis use class. Notwithstanding the mixed use of the site, therefore necessitating planning permission for a change of use, it is of note that permitted development rights exist to allow the lawful change of use from Use Class B8 to B1, therefore illustrating the presumption in favour of the provision of office floorspace.
- 5.19 Policy DP 13 relates to the change of use to non-business uses. In this instance, the scheme proposes the use of the building as offices, therefore Policy DP 13 is not engaged, as Use Class B1a office is a business use.
- 5.20 In addition, Policy DP 10 relates to '*Helping and promoting small and independent shops*'. In this instance, the existing use of the site is sui generis and is not expressly retail floor space, therefore Policy DP 10 is not engaged. The business that currently runs from the site is a camera/photography business and although a limited part of the business is based on walk-in trade, sales are predominantly web-based and the site functions as a storage/warehouse area supporting business generated online.
- 5.21 Moreover, the principle of the loss of the current use has been formally assessed as part of the pre-application enquiry for the redevelopment of the site for student accommodation. Page 5 of

the pre-application response (dated 5th September 2016) states '*No objection is raised to the loss of the existing retail use and the re-development of the site for student housing*'. The pre-application response demonstrates there is no policy conflict with the loss of the existing use and, furthermore, does not give weight to the redevelopment of the site for student accommodation purposes, therefore illustrating that the proposed use of the site is inconsequential in policy terms.

5.22 Core Strategy Policy CS8 seeks to protect industrial uses that are suitable and viable for continued use, however given the location of the site within the Central London Area, industrial and warehousing uses are largely incompatible with surrounding uses and activity and continued business use is proposed through the provision of office floor space. The Euston Area Plan seeks to promote employment, with between 180,000 sqm and approximately 280,000 sqm of new employment/economic floorspace, providing between 7,700 and approximately 14,100 jobs encouraging knowledge based, research and creative uses to strengthen Euston's existing role as a knowledge and research hub.

5.23 The site is located with the Central London Area wherein offices (Use Class B1a) are considered to be an acceptable use, notwithstanding the loss of a small amount of retail space at the site. The development would not be harmful to the vitality and viability of the area as the use of the site as offices will continue to provide jobs within this locality, in line with the ethos of the Core Strategy policies CS7 and CS8.

Principle of Office Use (Use Class B1a)

5.24 When determining planning applications, the Framework directs LPAs to apply a presumption in favour of sustainable development; the 'golden thread' which is expected to run through plan-making and decision-taking. Policy 14 of the Framework notes that the presumption in favour of development for decision taking means "approving development proposals that accord with the development plan without delay". This is re-iterated within policy 196 of the Framework.

5.25 Chapter 1 of the Framework, Building a strong, competitive economy, states that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.

5.26 Chapter 2 of the Framework states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period, including allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability.

5.27 London Plan Policy 4.2 – Offices, states that the Mayor will encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility and seek increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities. Paragraph 4.11 of the London Plan states that results from the 2009 London Office Policy Review indicate that office based employment may

grow by some 303,000 between 2011 and 2031. On the basis of this; a central assumption for office employment.

5.28 Policy CS8 - Promoting a successful and inclusive Camden economy states that the Council will secure a strong economy in Camden and seeks to ensure that no-one is excluded from its success and will:

a) promote the provision of 444,000 sq m of permitted office floorspace at King's Cross as well as in the range of 70,000 sq m of office provision at Euston with further provision in the other growth areas and Central London to meet the forecast demand of 615,000 sq m to 2026;

b) support Camden's industries by: - safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers; - safeguarding the borough's main Industry Area; and - promoting and protecting the jewellery industry in Hatton Garden;

c) expect a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace;

d) support local enterprise development, employment and training schemes for Camden residents;

e) recognise and encourage the concentrations of creative and cultural businesses in the borough as well as supporting the development of Camden's tourism sector whilst ensuring that any new facilities meet the other strategic objectives of the Core Strategy;

f) recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.

5.29 The Camden Employment Land Review 2008 forecasts that the demand for offices will increase by 615,000 sqm between 2006 and 2026. To meet this demand, the Council will direct new business development to the growth areas of King's Cross, Euston, Holborn and Tottenham Court Road, elsewhere in Central London, the town centres.

Assessment of Office Use (Use Class B1a)

5.30 Adopted local and national planning policy supports office uses within town centre locations. Core Strategy Policy CS8 highlights that Camden is the third largest employment centre in London after the City and Westminster, and eighth largest in the UK (Annual Business Inquiry 2007).

5.31 The change of use of the floor area at the site will provide additional, high-quality office space within a sustainable location, wherein office use is promoted and encouraged. Emerging Policy E1 Economic Development (Camden Local Plan 2016) states that the Council will secure a strong economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses by directing new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sq m of office floorspace between 2014 and 2031. The proposed change of use to office within Central London will accord with this policy.

Design, Scale and Amenity

- 5.32 The Framework at paragraph 17 sets out twelve Core Planning Principles, one of which states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
- 5.33 Core Strategy Policy CS1 - Distribution of growth states that the Council will promote the most efficient use of land and buildings in Camden by seeking development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. CS5 - Managing the impact of growth and development states that the Council will manage the impact of growth and development in Camden through various means, including protecting and enhancing our environment and heritage and the amenity and quality of life of local communities.
- 5.34 Policy DP26 - Managing the impact of development on occupiers and neighbours states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors that will be considered include:
- a) visual privacy and overlooking;
 - b) overshadowing and outlook;
 - c) sunlight, daylight and artificial light levels;
 - d) noise and vibration levels;
 - e) odour, fumes and dust;
 - f) microclimate;
 - g) the inclusion of appropriate attenuation measures. We will also require developments to provide:
 - h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
 - i) facilities for the storage, recycling and disposal of waste; j) facilities for bicycle storage; and
 - k) outdoor space for private or communal amenity space, wherever practical.
- 5.35 Policy 7.15 of the London Plan Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes, outlines a range of strategies for managing developments that impact on amenity in terms of noise impacts, including avoiding significant adverse noise impacts on health and quality of life as a result of new development and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses.

Assessment of Design, Scale and Amenity

- 5.36 The existing use of the site is as a commercial space, which exists without conflict within adjoining properties. The application seeks permission for a change of use from a blend of commercial uses to offices (Use Class B1a), as well as the reconfiguration of the roof profile to allow for the insertion of a mezzanine. The bulk and scale of the building will be increased; however the roof line will be a continuation of the neighbouring property 16 – 17 Melton Street and will be subservient to the dwellings fronting Cobourg Street. In addition, the unsightly three storey tower feature will be removed.
- 5.37 Overall, the uplift of the bulk and scale of the building will be limited, however will allow for the intensification of the site to provide additional office floor area at mezzanine level. The configuration of the site is such that the increase in height will be limited to the north of the site fronting onto Drummond Street. Whilst there will be a partial uplift in massing, the three storey element of the building will be removed, thereby reducing the overall height of the building. The rear portion of the building will remain the same and there will be no significant change in height. Given the configuration of the proposed changes, the additional scale will have no negative impact on neighbouring properties in terms of privacy and overlooking, overshadowing and outlook, or sunlight and daylight.
- 5.38 Pre-application feedback has been sought on the redevelopment of the site to provide a 5 storey building at the site and the written feedback suggested '*the proposed building would sit comfortably within its surroundings*' and would be '*similar in scale to the Ibis hotel building opposite*' (see page 8 of pre-application feedback at Appendix 1). Accordingly, it is considered that the uplift in scale and mass at the site has been assessed within the context of the surrounding area and no objection to a 5 storey building was found.
- 5.39 Office use is generally the lowest impact in terms of noise and typically represents a lesser noise source than workshop or storage and distribution uses. In this regard, the impact on surrounding properties in terms of noise will not be any greater than the existing arrangement.
- 5.40 In summary, the proposed change of use will not have any impact on the amenity of surrounding occupiers and complies with adopted local and national planning policy.

Transport and Highways

- 5.41 Policy 30 of the NPPF states encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion, stating that local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
- 5.42 The London Plan (Policy 6.1) encourages closer integration of transport and development by:
- encouraging patterns and nodes of development that reduce the need to travel, especially by car;
 - seeking to improve the accessibility of public transport, walking and cycling;

- supporting development that generates high levels of trips at locations with high levels of trips at locations with high public transport accessibility and / or capacity.

Cycle Parking

- 5.43 Policy 6.9 of the London Plan indicates that developments should provide secure, integrated and accessible cycle parking facilities. The London Plan Table 6.3 sets out the relevant cycle parking standards, stating that central London office space (Use Class B1) should provide 1 space per 90 sqm (long stay) and 1 space per 500sqm short stay cycle parking.

Car Parking

- 5.44 Car parking standards are provided within the Camden Development Policies 2010-2025 Local Development Framework. The car parking standards for B1 (office) require one space per disabled employee or, from a threshold of 2,500sqm, 1 space per 20,000sqm or part thereof – whichever is the greater. In terms of visitor parking, adopted standards require that from a threshold of 2,500sqm a minimum of 1 if any visitors are expected, plus any additional spaces needed to bring the total number up to 5% of the visitors likely to be present at any time. Parking for service vehicles is only required above a floor area threshold of 2,500 sqm and is not applicable.

Servicing / Refuse Collection

- 5.45 The servicing for the site, including refuse collection and deliveries will be in accordance with the existing arrangements, with refuse vehicles undertaking collections directly from Drummond Street and the majority of deliveries being undertaken from the existing on-street loading bay located on Drummond Street directly outside the Application Site.

Assessment of Transport and Highways

- 5.46 A Transport Statement prepared by RPS accompanies this report and sets out the relevant standards for car and cycle parking, detailing the adherence of the proposed development to adopted policy. The statement also reviews the impact on the wider highway network in terms of trip generation and reviews the provision for servicing/refuse collection.
- 5.47 A total of 40 cycle spaces will be provided, including 34 long stay spaces and 6 short stay spaces. Long stay spaces would be located inside, providing a covered and secure bike location and short stay spaces would be located near to the entrance, in an area of natural surveillance to ensure secure cycle parking.
- 5.48 Owing to the highly accessible nature of the site, which benefits from a PTAL rating of 6b, it is anticipated that the majority of trips to and from the site would be made by highly sustainable modes of transport. It can therefore be concluded that the proposed change of use of the site would not have a severe residual impact on the operation of the local transport and highway networks, in accordance with the requirements of the NPPF.

6 CONCLUSIONS

- 6.1 Canfield Freehold Limited seeks planning permission for the change of use to Use Class B1a office and reconfiguration of the roof profile allowing for the insertion of a mezzanine at the site addressed 93 – 103 Drummond Street, Euston, NW1 2HJ. Alterations to the façade of the building to upgrade the external appearance are also proposed.
- 6.2 The building on site comprises a part 2 and part 3 storey building of irregular layout that is used for a range of uses including office space, warehouse and storage and retail.
- 6.3 Pre-application discussions over the redevelopment of the site to student accommodation have confirmed that i) there is no policy conflict with the loss of the existing uses at the site; and ii) that the increase in bulk and scale at the site is acceptable.
- 6.4 The visual appearance of the existing building is poor quality and the proposed alterations will significantly improve the aesthetic of the building within the street scene, impacting positively on the setting of the designated and non-designated heritage assets in the locality.
- 6.5 The accompanying Heritage Statement sets out that the scheme proposals will not result in harm or loss of significance to the identified designated and non-designated heritage assets, in accordance with NPPF Paragraphs 134 & 135.
- 6.6 In addition, the accompanying Transport Note concludes that the development would not have a severe residual impact on the operation of the local transport and highway networks and a sufficient level of cycle/car parking spaces can be provided at the site.
- 6.7 Development of office and employment space within the Central London Area is encouraged, in line with the ethos of the Core Strategy and Development Management Policies, to promote the economy and keep up with demand for employment land, identified by The Camden Employment Land Review 2008.
- 6.8 Overall, the development is considered to meet strategic planning policy objectives and is in general conformity with other policies and material considerations. It is therefore considered that the development should be supported.



APPENDIX 1



Date: 05 September 2016
Our Ref: 2016/0797/PRE
Contact: Michael Cassidy
Direct Line: 020 7974 5666
Email: Michael.Cassidy@camden.gov.uk

Development Management
Regeneration and planning
Supporting Communities
Directorate
London Borough of Camden
5 Pancras Square
London N1C 4AG

Tel: 020 7974 4444
Fax: 020 7974 1680
planning@camden.gov.uk
www.camden.gov.uk/planning

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

Dear John,

Re: 93-103 Drummond Street, London, NW1 2HJ

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

Development of 99 student apartments (56 studios, 8 twin and 35 cluster units comprising 152 bed spaces) within a 5-storey building with basement and a commercial unit (218.46sq.m GEA) at basement and ground floor levels fronting Drummond Street.

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

- Design Statement by CZWG;
- Letter from GVA Schatunowski Brooks dated 12th 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 25th 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 previously provided 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 19th 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 Milton 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 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 CO₂ 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 CO₂ 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 school 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 has been 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

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 1st 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