

Stephenson House

On behalf of: Lazari Properties 2 Ltd

June 2017

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1 Executive Summary

- 1.1 The proposals within this application, brought forward by Lazari Properties 2 Ltd, will provide an exciting opportunity to redevelop this site, creating a sustainable mixed use office-led scheme together with high quality residential units.
- 1.2 The existing building detracts from the immediately surrounding area with poor quality active frontages on the principal elevation, recessed from the principal façade in a dark, inactive colonnade and features a heavy external cladding material. The existing building's secondary elevation is dull and entirely inactive, adding nothing to Drummond Street. Internally, the building provides inefficient office floorspace which does not meet modern day office floorspace market demand.
- 1.3 The proposals offer the opportunity to deliver efficient, flexible office floorspace suitable for multiple businesses of varying sizes and uses, allowing for a greater variety of enterprises to occupy this Central London Area office space.
- 1.4 The development will provide 17 high quality residential homes on the site, including 6 affordable units. These homes will supplement the enhancement of the existing uses on the site through introducing permanent residents to the Site.
- 1.5 The area surrounding the Site will undergo transformational change in the future as Euston station and the wider area develops following the opening of HS2. The area will become a gateway into central London. The Site lies within the Euston Area Plan, which seeks to transform the Euston area into a 'hub of activity' associated with the regeneration of the station.
- 1.6 The proposed development has been designed by Marks Barfield Architects for this future context. The architecture of the proposals is designed for a key, strategic location; the corner of the Site is visible from Euston Road and Tottenham Court Road. The proposals would lead to the improved activation of the ground floor façade through the relocation of the inactive, dark colonnade and insertion of a double height statement entrance on the corner of Drummond Street and Hampstead Road.
- 1.7 The scheme will deliver a number of planning benefits including:

- Contribute to the regeneration and transformation of the area;
- Sustainable reuse and regeneration of a building which no longer meets modern office user demands;
- Delivering high quality business floorspace that will contribute to sustainable economic development;
- Providing high quality residential accommodation to meet Camden's need for both market and affordable homes;
- Enhancing the existing building's retail provision through diversifying the retail provision on the site;
- Delivering sustainable development through improvements in energy efficiency;
- Creation of a high quality architecture to demarcate the Site within the Euston area;
- Improve lateral links from Euston Station to Regents Park;
- Improving accessibility to, and within, the boundary for all users;
- High quality design, contributing to the wider townscape setting;

1.8 In this context it is considered that the development will make a significant contribution to the area through maximising the potential opportunity of the site, providing appropriate links to and benefits for, the surrounding area and existing communities and according with the Council's aspirations and objections for the wider area.

1.9 The application proposals will achieve this and seek to comply with the Development Plan policies, guidance and standards contained therein.

2 Introduction

2.1 This Planning Statement is submitted in support of a detailed planning application made on behalf of Lazari Properties 2 Ltd ('the applicant') for the remodelling, refurbishment and extension of Stephenson House. This statement sets out the town planning case in support of the application. It summarises the planning history of the site and assesses the development in the context of relevant planning policies and guidance.

2.2 The proposals are described in greater detail in the Development Proposals section of this statement. In summary, planning permission is sought for:

“Extensive internal and external refurbishment of Stephenson House to provide a ground plus 7 storey building containing to provide 18, 181sqm (GIA) of Class B1 Office floorspace, 904sqm (GIA) of flexible Class B1/D1 floorspace, 857sqm (GIA) of Class A1 Retail floorspace, 118sqm (GIA) of Class A3 Retail floorspace and 17 Residential units (total 2130sqm GIA), comprising 11 market units (1 x 1 bed, 6x 2 bed, 4 x 3 bed) and 6 affordable units (3 x 2 bed, 3 x 3 bed). Removal of existing colonnade to Hampstead Road elevation, creation of double height entrance on Hampstead Road, creation of three terraces to the rear, three integral pocket gardens to the Hampstead Road elevation and balconies facing Hampstead Road to all residential units. Addition of PV panels to the roof, 249 commercial cycle parking spaces, 33 residential cycle parking spaces, 4 disabled car parking spaced, associated landscaping and works”

2.3 This planning statement is structured as follows:

- Chapter 3 – Site and Surroundings;
- Chapter 4 – Planning History;
- Chapter 5 – Development Proposals;
- Chapter 6 – Consultation;
- Chapter 7 – Planning Policy Context;
- Chapter 8 – Land Use;
- Chapter 9 – Design and Townscape;
- Chapter 10 – Energy and Sustainability

- Chapter 11 – Amenity; and
- Chapter 12 – Transport and Servicing.

2.4 The proposals, designed by Marks Barfield Architects, are described in section 4 of this report and detailed within the Design and Access Statement.

2.5 This planning statement should be read in conjunction with the following documents, also enclosed as part of this submission:

- Design and Access Statement, prepared by Marks Barfield;
- Contaminated Land Assessment, prepared by GEA;
- Crime Impact Assessment, prepared by Marks Barfield;
- Air Quality Assessment, prepared by Phlorum;
- Daylight and Sunlight report, prepared by Marks Barfield;
- Sustainable Urban Drainage report, prepared by UK Flood Risk Consultants;
- Drainage Statement, prepared by GLP;
- Residential Energy Briefing Note, prepared by GLP;
- Sustainability Statement, prepared by GLP;
- Energy Statement, prepared by GLP;
- Transport Assessments, prepared by RGP;
- Landscape Statement, prepared by TLP;
- Ecology Report, prepared by FOA Ecology;
- Statement of Community Involvement, prepared by London Communications Agency.

3 Site and Surroundings

- 3.1 Stephenson House lies at the junction of Hampstead Road and Drummond Street within the London Borough of Camden (LBC), just north of Euston Road and west of Euston Station.
- 3.2 The existing building was completed in the 1960s and reclad in the 1980s, and primarily fronts Hampstead Road and Drummond Street with a small frontage on William Road. The existing building comprises retail and flexible office/NHS clinic at ground floor with offices above.
- 3.3 The building is not listed and does not lie within a Conservation Area, nor are there any listed buildings or Conservation Areas immediately adjacent to the building. The nearest listed building is the Lord Nelson Public House, which lies on Stanhope Street, to the west of the Site. The nearest Conservation Areas to the site are the Regent's Park Conservation Area to the west and Bloomsbury Conservation Area to the south.
- 3.4 The Site has excellent public transport accessibility, achieving a PTAL rating of 6b (the highest). The Site lies in close proximity to numerous Underground stations: Warren Street, served by the Victoria and Northern lines; Euston Square, served by the Metropolitan, Circle and Hammersmith and City lines; and Euston, served by the Victoria and Northern lines as well as Overground Services to Watford Junction. The site is also closely located to Euston National Rail Station, which has services to Liverpool, Manchester and Birmingham.
- 3.5 The Site is within an area of change: Euston Station and the wider area is expected to become a hub of activities, representing a 'gateway' into London through high quality and transformational development. The Euston Plan views the existing station as forming an impermeable barrier, 'closing' the wider area to regeneration, but with the creation of HS2 the area will be opened up. The site lies on the key arterial road up from central London up to Camden and as such the proposals will form a critical part of this transformational development in the area.
- 3.6 The Site lies within the Euston Area Plan; the Euston Plan is prepared **"as a long term planning framework to guide transformational change in the area,**

focused around the redevelopment of Euston Station and seeks to spread regeneration potential to benefit the local community and London as a whole”.

- 3.7 The Euston Plan divides the plan area into seven different character areas; the Site lies within the Regent’s Park character area, described as:

“As a large post-war council estate, the Regent’s Park Estate is primarily residential in character, with supporting community facilities, pockets of green spaces and shops. The estate includes large residential slab blocks of up to eleven storeys, along with by a mix of maisonettes (four storeys) and point blocks. Robert Street provides a main east-west route through the estate, and includes a number of shops along with community facilities. The estate also includes three market squares: Clarence Gardens, Munster Square and Cumberland Market. Cumberland Market Estate is included within the extended Regent’s Park Conservation area in recognition of its historic value. This character area includes blocks within Regent’s Park Estate which could be negatively impacted by the construction of HS2”.

- 3.8 Despite lying within this character area, the Site is also closely related to the Drummond Street character area, with the opposite side of Hampstead Road forming the western boundary of this area. The architecture of the proposals has been designed to reflect the character area: the massing and height are of a similar scale and the proposals will seek to integrate greenery into the development.
- 3.9 Within the Euston Area Plan, Drummond Street is identified as a key east-west corridor link, running from Euston Station to Regent’s Park.
- 3.10 The site lies within the Wider Setting Consultation Area of the view from Greenwich Park Wolfe statue to St Paul and the Landmark Viewing Corridor from Parliament Hill to the Palace of Westminster, as set out within the Mayor’s London View Management Framework (LVMF). The existing development building sits just above the threshold plane for the Wider Setting Consultation Area and significantly below the threshold plane for the Landmark Viewing Corridor. It is not proposed to increase the building’s height within this Wider Setting Consultation Area view, however it is proposed to standardise the height of the building in line with the highest point of the existing building. This is discussed further in Section 9.

4 Planning History

- 4.1 The Site has a limited history available on LB Camden's online database of planning applications; the applications available primarily relate to advertising or change of use. The relevant applications are listed below in reverse chronological order.
- 4.2 Planning permission was granted in 2009 for "change of use and works of conversion from a Public House (Class A4) to Offices (Class B1a) and alterations to the external ground floor elevations fronting Drummond Street and Hampstead Road" (ref: 2007/3978/P) . This was granted following the closure of the Sols Arms Pub in 2007 which previously occupied the northern corner of the Site.
- 4.3 In 1998 planning permission was granted for the change of use of part of the ground floor from retail (Class A1) / photographic studio (Class B1c) to office use (Class B1) (ref: PS9705336).
- 4.4 Planning permission was granted in 1988 for the amendment of the roof plant details and an extension to the plant level of the glazed structure at the junction of Hampstead Road and Drummond Street (ref: 8802084).
- 4.5 In 1987 planning permission was granted for the change of use of the first-floor offices and removal of conditions attached to the original planning permission for the site, granted in 1960.
- 4.6 The earliest permission available from the site is the 1961 planning permission which was granted for the erection of an illuminated sign which read 'Stephenson House' (ref: AC870/A/P1/P2). Whilst the original planning permission is not available online, it is considered that the building was constructed prior to this date.

5 Development Proposals

- 5.1 A full description of the proposals and the design evolution can be found within the Design and Access Statement, prepared by the architects, Marks Barfield. This Planning Statement should be read in conjunction with the Design and Access Statement, the proposed planning drawings and other technical assessments, as listed at paragraph 2.5.
- 5.2 At present the site is occupied by a 1960s office building of 7 storeys. The site is currently in retail (A1), office (B1) as well as a small health facility (flexible B1/D1).
- 5.3 It is proposed to refurbish the existing building to create a high quality mixed use development, comprising office space, including space for small or medium enterprises (SME), retail floorspace, residential units, including affordable housing, and a flexible office/non-residential institutional space (B1/D1).
- 5.4 The description of development is as follows:

“Extensive refurbishment and mixed use development of Stephenson House to provide Class B1 Office floorspace, flexible Class B1/D1 floorspace, 17 Residential units, Class A1 Retail Units, and Class A3 Restaurant Unit at ground floor, and associated works.”
- 5.5 The Euston area is increasingly becoming a hub of activity and the area is positioning itself as gateway into London through high quality, transformational development associated with HS2. The aims for the future of the area are specified within the Euston Plan. The proposal development entirely accords with the aims of the Euston Plan through significantly enhancing the area with the proposed land uses, architecture and public realm.
- 5.6 It is proposed to create 18,573 sqm (GEA) of office space, including SME space, to accommodate approximately 1,875 jobs.
- 5.7 Retail floorspace will be reprovided at ground floor level and will include a ground floor café, located on the corner of Drummond Street and Hampstead Road, which will be accessible to both the public and occupants of the building.

- 5.8 The proposed building will be 7 storeys in height with a single storey basement level. An atrium will run through the centre of the building's floorplate from basement to third floor with a glazed roof over the atrium at fourth floor level; from fourth floor the floorplate will be 'L shaped'. The atrium will improve the perception of brightness for office users as well as breaking up the floorplates to provide visual interest.
- 5.9 The building is located in a prominent position on the corner of Drummond Street and Hampstead Road and is visible from both Euston Road and Tottenham Court Road. It therefore represents an opportunity to create a feature to signal and identify the building both from afar and up close. It is proposed to create a lantern with a different materiality on this corner to identify the building as well as being a beacon in terms of townscape.
- 5.10 It is proposed to create 17 high quality residential units which will be located in the northern portion of the building and accessed from Hampstead Road. Of these 17 units, 6 will be affordable. The majority of proposed units will have 2 or more bedrooms, corresponding to the borough's housing needs; the following mix is proposed: 9 x 2 bedroom units; 7 x 3 bedroom units; and 1 x 1 bedroom units. The vast majority of these units will be duplexes or will have dual aspect.
- 5.11 The existing and proposed land uses are listed within Table 1, below.

	Existing (GEA)	Proposed (GEA)
Office (B1)	14,647	18,573
Flexible D1/B1	2,266	918
Retail (A1)	1,215	873
Retail (A3)	-	119
Residential (C3)	-	2,532
Total	18,128	23,015

- 5.12 The site has excellent public transport links, with close proximity to Euston Square, Warren Street and Great Portland Street underground stations as well as national rail and overground services from Euston Station. Given the site's location, it is not proposed to provide any parking on site with the exception of 4 blue badge parking spaces.

- 5.13 It is proposed to provide 249 commercial cycle parking spaces at lower ground and at street level, some of these spaces will be suitable for storing a disabled cycle.

- 5.14 The existing building features a colonnade which is dark, uninviting to pedestrians, attracts anti-social behaviour and limits the effectiveness of the active frontage along the street as the shopfronts are recessed from the street.

- 5.15 It is proposed to relocate the arcade to the corner of Hampstead Road and Drummond Street; this arcade will be a double height space and will wrap around the corner onto Drummond Street. This will improve the entrance to the office building, through providing a statement entrance and enhancing perceptions of brightness within the arcade. Furthermore, this will provide active frontages along Drummond Street, which currently features inactive, stark frontages, and draw pedestrians from Hampstead Road around the corner onto Drummond Street. A further result of these proposals will be to remove the setback shopfronts which will greatly enhance the perception of activity along Hampstead Road.

- 5.16 It is proposed to upgrade the public realm on Hampstead Road through improving paving and supplementing the existing Dawn Redwood trees with Maidenhair Trees. These works will improve the pedestrian experience on Hampstead Road and make the street scene more attractive.

- 5.17 Three double height pocket gardens are proposed within the primary Hampstead Road elevation. Internally, the floorplate is designed so that the most of the office floorspace looks into one of these gardens. The three pocket gardens will be interconnected, allowing employees to move through the building's floors via the pocket gardens; this is, however, dependent on the end occupier of each floor.

- 5.18 The pocket gardens will then connect to the L shaped terraces to the rear of the building. Each terrace will feature different flora dependent on the level of exposure

at each level. The inclusion of greenery will increase biodiversity, provide visual amenity as well as provide outdoor space for the residents and office workers.

- 5.19 The development will aid in forming lateral links between Euston Station and Regent's Park, by identifying the site as well improving the pedestrian experience at street level through design and through active frontages.

6 Consultation

- 6.1 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process.
- 6.2 The National Planning Policy Framework emphasises that early engagement and good quality pre-application discussion enables better coordination between public and private resources.
- 6.3 In addition, the participation of other consenting bodies in pre-application discussions should enable early consideration of all the issues relating to whether a development will be acceptable.
- 6.4 In light of policy guidance on pre-application discussions, the applicant has sought to engage and discuss the proposals at length with LBC planning and design officers; the LBC Design Review Panel (DRP) and local residents' groups and neighbours.
- 6.5 The accompanying Statement of Community Involvement (SCI), prepared by London Communications Agency, sets out the details of all the consultation that has taken place and the responses received.
- 6.6 A series of pre-application discussions were held with LB Camden throughout the development of the proposals from October 2016 to May 2017.
- 6.7 The pre-application meetings covered a variety of themes, including centring meeting discussions on affordable housing, transport and daylight and sunlight.
- 6.8 Numerous design workshops were held with LB Camden Officers during the evolution of the design. LB Camden officers made various observations, including ensuring that the design reflected the changing identity of the area as well as the site's visual connection down to Tottenham Court Road. These comments became central to the design. Throughout the process, the design workshops informed the design of the final scheme, with particular emphasis on the lantern, on the corner of Drummond Street and Hampstead Road, due to its prominence when viewed from Euston Road and Tottenham Court Road.

6.9 Informal public exhibitions sessions, open to all, were held at Lazari Maple House, which is located approximately 200m south of the site opposite Warren Street. The public exhibition was held on the following:

- Thursday 4 May 2017, 17:00 – 20:00
- Saturday 6 May 2017, 10:00 – 14:00

6.10 The dates, times and locations were chosen to enable the maximum number of people to attend. Throughout the sessions, project staff were available to talk people through the display, explain the proposals and answer any questions.

6.11 In addition to the informal public exhibition, numerous local groups and other stakeholders were asked whether they would like a briefing.

7 Planning Policy Context

- 7.1 Planning policy operates at three levels. At a national level, Central Government adopted the National Planning Policy Framework (NPPF) document in March 2012. The NPPF document supersedes previous national planning policy guidance and planning policy statements.
- 7.2 The London Plan is the overall strategic plan for Greater London. The aim of the London Plan is to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the statutory development plan.
- 7.3 At a local level, policy is contained within the Camden Local Development Framework (LDF). At the time of submission, the Development Plan is made up of Camden's Core Strategy, Development Policies and Site Allocations Document. These documents set out the Council's intentions for land use and development from 2010 to 2025. The Development Policies provide more detailed policies (from those in the Core Strategy) for assessing planning applications. The LDF documents are up to date and should be afforded full weight.
- 7.4 In May 2017, Camden Council announced that they would be adopting their Local Plan on 26th June 2017. This document will then become the Development Plan in the area against which all planning applications are assessed.
- 7.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

National Planning Policy

- 7.6 National planning policy is contained with the NPPF, which superseded all Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs) on its adopted in 2012.
- 7.7 The NPPF was published on 27 March 2012 and contains the Government's planning policies for England and how these are expected to be applied. It

summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

- 7.8 The NPPF introduces the presumption in favour of sustainable development although it still requires that proposals be determined in accordance with the development plan.
- 7.9 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 7.10 The Ministerial Statement, Planning for Growth, emphasises the importance of securing economic growth and employment. The document states that when considering planning applications, Local Planning Authorities should support enterprise and facilitate housing, economic and other forms of sustainable development.
- 7.11 On 6th March 2014, the Department for Communities and Local Government (DCLG) launched its Planning Practice Guidance (PPG). The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. The guidelines set out in the PPG are a material consideration which should be accorded weight when determining an application.

Regional Planning Policy – The London Plan (July 2011), revised Early Minor Alterations (October 2013), Further Alterations (2015) and Minor Alterations (2016)

- 7.12 The London Plan is the overall strategic plan for Greater London, which includes the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning

agendas, and forms part of the statutory development plan.

- 7.13 The Revised Early Minor Alterations (REMA) to the London Plan were published in October 2013. The alterations ensure the Plan is in accordance with the NPPF as well as updating certain policies.
- 7.14 Further Alterations to the London Plan (FALP) were published on 10 March 2015. These further alterations primarily address changing housing targets for London and individual Boroughs.
- 7.15 Minor Alterations to the London Plan, which relate to housing standards and parking standards in outer London, were published on 14 March 2016.
- 7.16 A new vision for the capital, entitled 'A City for All Londoners', was consulted on between October 2016 and December 2016; this document was the new Mayor's first steps towards creating a new 'London Plan'. This document outlines the top challenges and opportunities facing the city across numerous policy areas as well as discussing the changes that City Hall wants to deliver over the next four years. It is anticipated that a further consultation will be undertaken in 2017.
- 7.17 The London Plan sets out the relevant London-wide planning policy guidance and sets the relevant regional planning policy guidance for London and forms a component part of the statutory development plan.
- 7.18 The Mayor considers that the greatest challenge London faces is to accommodate significant growth in ways that respect and improve London's diverse heritage whilst delivering the vision for an exemplary, sustainable world city. This will involve the sensitive intensification of development in locations that are, or will be, well served by public transport.
- 7.19 The proposal has taken into account the most relevant London Plan policies and guidance affecting the development of the building, including those relating to land use, design, sustainability and the public realm. The relevant London Plan policies are referred to where relevant within this Statement.

Local Planning Policy

- 7.20 At the local level, Camden's (LBC) Core Strategy (2010) sets out strategic policies. Development control policies are set out within the Development Control Document (2010).
- 7.21 Camden Council is undertaking a review of its current planning policy documents. Consultation on the Local Plan Submission Draft ran for 8 weeks from 8th February to the 4th April 2016. On 24th June 2016 the Council submitted the Camden Local Plan and supporting documents to the Secretary of State for independent examination. LB Camden announced in May 2017 that they would be adopting their new Local Plan on 26th June 2017. Both the adopted and emerging policies are referred to throughout this document.
- 7.22 LBC also produces supplementary planning and design guidance. The following SPGs are of relevance to this application:
- Camden Planning Guidance 1 (CPG1) – Design;
 - Camden Planning Guidance 2 (CPG2) – Housing;
 - Camden Planning Guidance 3 (CPG3) – Sustainability;
 - Camden Planning Guidance 5 (CPG5) – Town centres, retail and employment;
 - Camden Planning Guidance 6 (CPG6) – Amenity;
 - Camden Planning Guidance 7 (CPG7) – Transport; and
 - Camden Planning Guidance 8 (CPG8) – Planning Obligations.
- 7.23 The Site has the following Planning Policy designations:
- Within the Central London Area;
 - Within Greenwich Park Wolfe Statue to Tower Bridge Right Lateral Assessment Area (east part of site only); and
 - Within Euston Plan Area.
- 7.24 The following Planning Policy designations neighbour the site and therefore are considered where relevant:

- Opposite Drummond Street Neighbourhood Centre; and
- Opposite Euston Growth Area.

8 Land Use

8.1 This section assesses the proposals against relevant national, regional and local policies of the different land uses proposed within the development:

- Office, including space for small and medium enterprises (SME);
- Retail;
- Mixed Use;
- Residential

Office

National Planning Policy

8.2 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century.

8.3 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local Planning Authorities should consider the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect benefits such as increased consumer choice, more viable communities and more robust local economies.

Regional Planning Policy

8.4 The LP notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London's financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media.

8.5 Policy 4.2 provides details on offices, stating that the Mayor will, inter alia:

- a. support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises;**
- b. recognise and address strategic as well as local differences in implementing this policy to:**
 - meet the distinct needs of the central London office market;**
 - consolidate and extend the strengths of the diverse office markets elsewhere in the capital by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable, complementary uses**
- c. encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility**

Local Planning Policy

8.6 LBC policy CS9 supports growth in homes, offices, hotels, shops and other uses within Central London. LBC will, inter alia:

- i. recognise its unique role, character and challenges;**
- ii. support Central London as a focus for Camden's future growth in homes, offices, shops, hotels and other uses;**
- iii. seek to ensure that development in Central London, in the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn and beyond, contributes to London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life;**
- iv. support residential communities within Central London by protecting amenity and supporting community facilities;**

v. seek to secure additional housing and affordable homes, including as part of appropriate mixed use developments.

- 8.7 LBC policy CS8 of the Core Strategy states that a concentration of office growth should be promoted across growth areas and Central London. Further, part c states that LBC will expect a mix of employment facilities and types and part e states that the provision of facilities suitable for small and medium sized enterprises will be expected, such as managed, affordable workspace.
- 8.8 LBC development control policy DP13 states that where sites are suitable for continued business use, LBC will consider redevelopment proposals for mixed use schemes provided that the level of employment floorspace is maintained or increased and they include other priority uses, such as housing.
- 8.9 Policy G1 of the emerging Local Plan states that the Council will seek development throughout the borough, with the most significant growth directed to growth areas, including Euston. The site lies just beyond the Euston growth area.
- 8.10 Policy E1 of the emerging Local Plan states that LBC will encourage the development of SMEs and start-ups. Under Policy E2, existing office provision will be protected and higher intensity redevelopment will be encouraged where various provisos are met, including:
- **The level of floorspace is increased or at least maintained;**
 - **The redevelopment retains the existing business on the site as far as possible;**
 - **The proposed premises include floorspace suitable for start-ups, small and medium enterprises, such as managed affordable workspaces where viable;**
 - **The scheme would increase employment opportunities for local residents, including training and apprenticeships; and**
 - **The scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site.**
- 8.11 Strategic Principle EAP 1 of the Euston Plan provides overall guidance on the land

use strategy in the area, stating that the Plan will seek the provision of “between 180,000 and approximately 280,000 sqm of employment/economic floorspace across the Euston area including replacement floorspace”. Further, it states that it will seek the provision of “mainstream office uses (B1a use class) to provide a mix of institutions, corporate occupiers and small businesses” as well as “research and development space (B1b use class)”.

Consideration of the Proposals

8.12 The existing office floorspace is out-dated, of a poor quality and no longer fit for purpose. It is proposed to enhance the quantum and quality of floorspace to create Grade A floorspace throughout; this will consolidate and improve the area’s business floorspace as well as enhance London’s competitiveness more widely, as required by London Plan policy 4.2.

8.13 There is no loss of office floorspace proposed, as shown in table 2.

Table 2

	Existing (GEA)	Proposed (GEA)
B1 office floorspace	14,647	18,573

8.14 Given Stephenson House’s central location and proximity to public transport the intensification of office floorspace is appropriate as discussed under LBC Policy CS8, emerging Policy G1 and London Plan policy 4.2.

8.15 The proposed office floorspace will vastly improve the environment and experience of the workplace for employees in the building, through providing high quality office space, incorporating the elements of design recommended by the International Wellbeing Institute.

8.16 In addition to high quality design, the experience of the offices will be improved through the inclusion of the atrium which will run through the centre of the building, improving light, perceptions of space and enhancing the building’s visual interest.

- 8.17 The double height pocket gardens will provide employees with access to greenspace within the building itself as well as providing informal meeting places.
- 8.18 In addition to an enhancement of the experience and design of the office space, it is proposed to provide an element of office floorspace for SMEs, in line with local Policy CS8. The SME space will be located at first floor level on the northern part of the site, beneath the proposed residential units and accessed via an entrance off Hampstead Road.
- 8.19 The provision of SME space will allow smaller businesses to locate in the Euston area, ensuring that Stephenson House contains a diversity of tenants, businesses and sectors. As such, the proposals accord with Strategic Principle EAP1 of the Euston Plan, which seeks mix 'mainstream offices' with smaller businesses.
- 8.20 It is considered, therefore, that the enhancement and intensification of the existing office floorspace is entirely compliant with the aims of the NPPF, London Plan policies 2.11 and 4.2, local policies CS9, DP13, EAP1 as well as policies G1 and E1 of the emerging Local Plan.
- 8.21 Furthermore, it is considered that the proposals will create a significant number of jobs on the site which meets the wider aims of the Euston Plan and Camden's Local Plan.

Retail

National Planning Policy

- 8.22 At a national planning policy level, paragraph 23 of the NPPF 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.
- 8.23 The guidance makes clear that local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.
- 8.24 The NPPF requires that Local Planning Authorities should apply a sequential approach when considering the most appropriate location for retail uses i.e. focusing

large scale retail in High Order Centres.

- 8.25 Paragraph 23 goes on to state that it is important that needs for retail and other town centre uses are met in full and are not compromised by limited site availability.

Regional Planning Policy

- 8.26 At a regional level, the LP sets out a number of policies relating to town centres and retail development.
- 8.27 Policy 4.7 provides guidance on retail and town centre development, stating that “retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport”.

Local Planning Policy

- 8.28 At a local level, Policy CS1 sets out the distribution of growth within the Borough. The policy seeks sustainable development which makes the most efficient use of limited land and buildings.
- 8.29 Policy CS7 states that retail growth can be directed to town centres, the Central London Frontages and Neighbourhood Centres. It also states that the Council will support “limited provision of small shops outside centres to meet local needs”.
- 8.30 In terms of food and drink uses, Policy DP12 provides guidance on food, drink and entertainment uses, stating that the Council will ensure that the development of these uses does not cause harm to the function, vitality and viability of an area. The policy further states that the Council will consider:
- a) **“The effect of non-retail development on shopping provision and the character of the centre in which it is located;**
 - b) **The cumulative impact of food and drink and entertainment uses taking into account the number and distribution of existing uses and non-implemented planning permissions, and any record of harm caused by**

such uses;

- c) The impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;**
- d) Parking, stopping and servicing and the effect of the development on east of movement on the footpath;**
- e) Noise and vibration generated either inside or outside of the site;**
- f) Fumes likely to be generated and the potential for effective and unobtrusive ventilation;**
- g) The potential for crime and antisocial behaviour, including littering.”**

8.31 Strategic Principle 1 of the Euston Plan states that the Council will seek “new and re-provided retail (use classes A1-A5) of which around 50% should be A1 shops to meet demand from Euston Station, to contribute to vibrant streets and reinforce the role of existing centre”.

8.32 The site is not within a town centre, growth area or a central London frontage, therefore emerging Policy TC3 is applicable; LBC will seek to protect shops outside of centres.

Consideration of the Proposals

8.33 It is proposed to enhance the quality of Stephenson House’s existing retail provision. Whilst the site does not lie within a defined shopping centre, it is within the CAZ and is close to the existing Drummond Street Neighbourhood Centre. Furthermore, the site is going to undergo change as a result of the development of HS2 around Euston and the area is expected to be perceived as a central area, as per the Euston Plan. It is therefore appropriate to retain and enhance the existing retail units in this location.

8.34 In addition to the Class A1 floorspace, it is proposed to provide some Class A3 floorspace allow the provision of a café / restaurant in the building. The inclusion of A3 floorspace will enhance and complement the Class A1 retail within the site. As table 3, below, outlines, there is loss of 104 sqm of retail floorspace overall; this is not a loss of front of house retail space, rather it is due to the existing retail space having ancillary plant and car parking which the proposed retail space does not. It is therefore considered that quantum of floorspace lost is balanced and justified when

considered against the benefits of upgrading the existing retail space and the wider benefits of the scheme.

Table 3

	Existing (GEA)	Proposed (GEA)
A1	1,215	992
A3	0	119

- 8.35 The Class A3 use is proposed to be located on the southern side of the building. The A3 unit is relatively small and is therefore not considered to have an impact on the amenity of neighbours. In addition, it is not considered that the addition of A3 uses in this location will have a detrimental impact on the vitality of the area or lead to an over concentration of food and drink uses. There are limited existing A3 uses surrounding the site, to the south lies a supermarket and beyond that a sushi takeaway, and to the north of the site lies a cash and carry and an off licence.
- 8.36 The provision of A1 and A3 uses in this location will enhance the area's retail attraction and will be contribute to the Euston Plan's vision of rejuvenating the area "as both a local hub of activity and a gateway to London". The evolving status of the area was central to the design iteration; the building and its uses have been designed to have longevity as the area changes and contribute to the rejuvenation of the area.
- 8.37 It is also considered that the provision of a mix of types of retailers in this location will increase pedestrians dwell time in the area, therefore enhancing the area's vitality.
- 8.38 At present, retail units are located solely on the Hampstead Road elevation with access beneath the colonnade. It is proposed to locate 2 retail units on Hampstead Road and 2 retail units on Drummond Street.
- 8.39 At present, the retail units have shopfronts within the existing dark colonnade and therefore are set back from the street.
- 8.40 Under the proposals it is proposed to move the arcade to the southern edge of the site, to provide a statement double height entrance into the building. As a result of

this relocation of the arcade, the proposed shopfronts on Hampstead Road will open directly onto the street, rather than being recessed within the colonnade. This will enhance the perception of active frontages along Hampstead Road for pedestrians and will also improve light into the retail units.

- 8.41 It is also proposed to extend the arcade down Drummond Street. It is intended that this 'active corner' will draw people down Drummond Street, enhancing activity along this street which is dull and inactive at present. Once Crossrail is open at Euston, it is considered that Drummond Street will be an important route between the station and Regent's Park; the proposed works will enhance this.
- 8.42 In addition, it is proposed to create a single holistic signage scheme to improve the appearance of the shopfronts as well as enhancing the legibility of the street to pedestrian using the retail space.

Mixed Use

Regional Planning Policy

- 8.43 Policies 2.11 and 4.3 states that the Mayor and Boroughs should ensure that development proposals to increase office floorspace within the CAZ include a mix of uses including housing. This has, however, been supplemented by the recently adopted CAZ SPD. The emphasis of this SPD is to encourage the provision of office and business floorspace within the CAZ and the document sees a shift towards greater weight being placed on the provision of offices and other CAZ strategic functions relative to new residential. In this particular location it states that offices and other CAZ strategic functions should be given greater weight relative to new residential.

Local Planning Policy

- 8.44 At a local level, policy DP1 contained within the Camden Development Policies, 2010 (adopted prior to the recent CAZ SPG) considers that where a proposal will increase the total gross floorspace of a site in the Central London area or within a Town Centre by more than 200 sqm, the Council will expect a contribution to the supply of housing. Where appropriate, the Council will negotiate up to 50% of

additional gross floorspace (GEA) as housing. The Council will require any secondary uses to be provided on site, particularly where 1,000 sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is triggered by policy but cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally, a payment in lieu.

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

- “a) The character of the development, the site and the area;**
- b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;**
- c) the need for an active street frontages and natural surveillance;**
- d) the economics and financial viability of the development including any particular costs associated with it;**
- e) whether the sole or primary use proposed is housing;**
- f) whether secondary uses would be incompatible with the character of the primary use;**
- g) whether an extension to the gross floorspace is needed for an existing user;**
- h) whether the development is publicly funded;**
- i) any other planning objectives considered to be a priority for the site.”**

- 8.46 The policy continues to state that where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area or exceptionally a payment in lieu.

- 8.47 As acknowledged in the Core Strategy, the Council gives priority to housing but not to the extent that this priority should override the need to protect some non-residential uses across the borough. It is also noted that priority for housing needs to be considered in the context of the characteristics of specific areas, sites and properties. The supporting text to Policy DP1 recognises that there are a number of circumstances where a mix of uses may not be sought.
- 8.48 As per the existing policy, the emerging Local Plan will seek residential provision on mixed use schemes: Policy H2 states that developments which propose more than 200sqm of additional floorspace will also be required to provide up to 50% of the equivalent additional floorspace as housing.
- 8.49 Policy C1 of the emerging Local Plan will seek the provision of existing health facilities.

Consideration of the proposals

- 8.50 It is proposed to create a mixed use development, comprising retail, office and residential floorspace. The proposed development increases the total gross floorspace on site by 4998 sqm; it, therefore, triggers Policy DP1 and a contribution to Camden's supply of housing.
- 8.51 It is proposed to provide 2,513 sqm (GEA) of residential floorspace on site; this represents 50.2% of the total gross uplift of all land uses proposed on site. The proposals are therefore entirely compliant with Camden's mixed use policy, policy DP1. Table 4, below, illustrates compliance with Policy DP1.

	Floorspace in sqm (GEA)
Existing	18,128
Proposed	23,015
Gross Uplift	4,887

Policy DP1 – Policy compliant residential requirement	2,444
Policy DP1 – Proposed residential in Stephenson House	2,532

- 8.52 It is considered that a mixed use development in this location will vastly improve the existing building's contribution to the area's vitality through attracting both transient day-time visitors to the retail offerings, offices and flexible health / office space as well permanent residential populations.
- 8.53 In order to ensure the amenity of all of the building's future users, the residential and commercial are separated and will have adequate insulation.
- 8.54 It is considered that the mix of uses proposed on site is compliant with Local Policy DP1 and H2 as well as Policy C1 of the emerging Local Plan.

Residential

- 8.55 A central theme of the NPPF is the presumption in favour of sustainable development, as set out in Paragraph 14. The paragraph goes on to state that planning applications should be approved without delay where they accord with the development plan.
- 8.56 There are three dimensions to sustainable development as defined in Paragraph 7 of the NPPF: economic, social and environmental. The social element states that:
- “- **a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;**
 - **a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built**

environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- **an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”**

- 8.57 Paragraph 17 sets out the core principles of the framework that should underpin plan and decision making. One of these core principles is the promotion of the effective reuse of previously developed land.
- 8.58 Section 6 provides guidance on delivering high quality homes and specifically, at paragraph 47, seeks to boost the supply of homes.
- 8.59 Further, at paragraph 49, the NPPF advises that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 8.60 At paragraph 50, the NPPF states that in order to provide inclusive and mixed communities, LPAs should plan for a mix of housing, provide homes of a size, type and tenure appropriate to local demand and set out policies for the provision of affordable housing. Further, the NPPF advises that LPAs should “identify and bring back into residential use empty housing and buildings”.
- 8.61 The NPPG provides additional guidance on residential development and provides technical detail on standards. Paragraphs 5 – 11 discuss details of wheelchair accessibility. At paragraph 19, it confirms that all new homes should meet the ‘nationally prescribed space standards’.

Regional Planning Policy

- 8.62 At the regional level, the London Plan emphasises the need for more homes in the capital at a range of tenures and of a range of sizes. As such there are several planning policies that seek to support the development of residential properties

across the city.

- 8.63 Policy 3.3 (Increasing Housing Supply) states that Boroughs should seek to meet and exceed the minimum housing development targets, where LBC's minimum is 8,892 homes per annum (as per London Plan, March 2016). It also advises that LPAs should look to brownfield sites to meet needs through, inter alia, intensification of existing residential use and the renewal of existing residential areas, especially in areas of good public transport.
- 8.64 Policy 3.9 states that communities, mixed and **“balanced by tenure and household income, will be promoted across London through incremental small scale, as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities’ sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment”**.
- 8.65 With regard to affordable housing, Policy 3.10 outlines that homes **“should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision”**.
- 8.66 The Mayor of London published the draft ‘Homes for Londoners’ Supplementary Planning Guidance in November 2016 for consultation. The development of this guidance is not considered to be advanced enough to be given significant weight when determining planning applications as it is not yet adopted.

Local Planning Policy

- 8.67 Core Strategy Policy CS6 provides the overall guidance on housing development in Camden. The policy states that the Council will seek to maximise additional housing provision in order to meet or exceed the target of 8,925 homes per annum. The policy will seek to create mixed and inclusive communities, reducing social polarisation, through:

“j) seeking a diverse range of housing products in the market and affordable sectors to provide a range of homes accessible across the spectrum of

household incomes;

k) seeking a range of self-contained homes of different sizes to meet the Council's identified dwelling-size priorities;

l) seeking a variety of housing types suitable for different groups, including families, people with mobility difficulties, older people, homeless people and vulnerable people; and

m) giving priority to development that provides affordable housing and housing for vulnerable people".

8.68 In terms of affordable housing, Core Strategy Policy CS6 states that the Council aims to ensure that 50% of homes built in the borough are affordable.

8.69 It further states that the borough will seek to negotiate an affordable housing contribution **"on the basis of:**

- **the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development,**
- **an affordable housing target of 50% of the total addition to housing floorspace, and**
- **guidelines of 60% social rented housing and 40% intermediate affordable housing".**

8.70 Policy DP5 of the Development Management Document provides guidance on the mix of homes proposed, stating that the Council will seek to ensure that residential developments meet the priorities set out in the Dwelling Size Priorities Table (table 5 below). In addition, the Council will also expect an element of large and small homes.

Table 5 – Dwelling Size Priorities Table (reproduced from Policy DP5)

	1 bed	2 bed	3 bed	4 bed +	Aim
Social rented	Lower	Medium	High	Very high	50% large

Intermediate	Medium	High	High	High	10% large
Market	Lower	Very high	Medium	medium	40% 2 bed

8.71 The emerging Local Plan states, at paragraph 2.8, that the Council will seek high quality, high density development. Whilst policy H1 states that housing is the priority land use for the Council, stating at part d that it will, on sites that are underused or vacant, expect the **“maximum reasonable provision of housing that is compatible with any other uses needed on the site”**.

8.72 Policy H4 provides guidance on affordable housing, stating that the Council will seek to negotiate the maximum reasonable amount of affordable housing and, where more than 10 homes are proposed, will expect affordable housing to be provided on site. LBC will seek larger homes and a tenure breakdown of approximately 60% social rented and 40% intermediate.

8.73 In order to create mixed and inclusive communities, Policy H6 of the emerging Local Plan will seek a mix of unit sizes: priority for market homes will be 2 and 3 bed properties, priority for social affordable homes is 2, 3 and 4 bed properties and priority for intermediate homes will be 1 and 2 bed properties.

8.74 In the emerging Local Plan, the Council’s dwelling size priorities have been updated, this is outlined in table 6 below.

Table 6 – Emerging Dwelling Size Priorities Table (reproduced from Policy H7)

	1 bed	2 bed	3 bed	4 bed +	Aim
Social rented	Lower	Medium	High	Very high	50% large
Intermediate	Medium	High	High	High	10% large
Market	Lower	Very high	Medium	medium	40% 2 bed

Assessment

- 8.75 It is proposed to create 17 high quality residential units, which will provide much needed homes for Londoners as outlined in the London Plan and in LBC Local Policy.
- 8.76 The homes will enhance the mix of uses on the site and contribute to the vitality of the area though introducing permanent residents, in market and affordable homes, rather than just transient office workers.
- 8.77 Of the 17 homes proposed in Stephenson House, 6 will be affordable flats; this represents 35% of the residential units proposed. This figure has been developed and agreed with LB Camden as the maximum amount that the site can accommodate, given the specifics of the site. The provision of 35% affordable within the proposed development, rather than as a payment in lieu, will aid LBC in meeting their borough-wide target for affordable homes. Furthermore, the provision of residential on site ensures that the proposals comply with LBC's mixed use policy, DP1.
- 8.78 A range of unit sizes are proposed in the development in line with the priority housing sizes specified in LBC's Development Management Plan. The proposed breakdown in units is shown in Table 7.
- 8.79 With regard to market units, it is proposed to create 3 x 3 bed units, 7 x 2 bed units, 1 x 1 bed unit; this breakdown accords with the Council's dwelling priorities outline in DP5 as over 40% of the units have 2 bedrooms. Furthermore, this breakdown complies with the amended dwelling priorities under emerging Local Plan policy H7, as all but one unit has two and three bedrooms.

Table 7 – Unit breakdown

Unit Size	Occupants	Market	Affordable	
			Intermediate	Social
3 bed	5 people	3		3
2 bed	3 people	3	1	

	3 people duplex	1	1	1
	4 people	2	-	-
	4 people duplex	1	-	-
1 bed	2 people	1	-	-

- 8.80 The affordable units proposed will be both for intermediate tenure and social rent; two 2 bedroom units will be intermediate sale whilst there will be one 2 bedroom unit and three 3 bedroom units for social rent.
- 8.81 The site is closely located to numerous underground stations, national rail stations and bus stops; it is therefore considered to be highly accessible and an entirely appropriate location for residential accommodation. Further, the Regent's Park Estate lies to the west of the site and there is residential accommodation on the opposite site of Hampstead Road. The proposed residential units within this mixed use development are therefore in keeping with, and enhance the existing residential uses in the area, whilst also being appropriate for the changing context of the area
- 8.82 The residential units will be located on the northern part of the site, occupying the second floor and above and will be accessed from Hampstead Road. It is proposed to have two entrances, one for the market units and one for the affordable units; this allows any future Registered Provider to have control over the communal areas.
- 8.83 The location of the units within the building was selected through a detailed overshadowing and daylight/sunlight analysis; the northern portion of the site was found to receive the most optimum amount of light. It was found that Drummond Street would be overshadowed all year around and the central part of the site is shaded in December – September, whilst the northern portion of the site would only be shaded in December.
- 8.84 The flats will feature balconies that overlook Hampstead Road to provide private

external amenity space. The balconies will provide natural surveillance onto the street below which should vastly improve pedestrian perception of safety as the existing street features a recessed colonnade. Natural surveillance reflects the aims of borough-wide policy as well as the aims of the Euston Plan.

- 8.85 The windows of the residential units have been designed to be angled so as to ensure the privacy of the occupiers.
- 8.86 In addition, 2 wheelchair accessible units will be provided to ensure that the units of both tenures can accommodate residents with mobility issues. The 2 bedroom (2 person) intermediate unit is to be wheelchair accessible, as is the 3 bedroom (5 person) market unit.
- 8.87 The residential units will range in size from 78 sqm for a 2 bed (4 person) flat to 139 sqm for a 3 bed (5 person) flat. All residential units exceed the London Plan space standards, specified at Policy 3.5 and therefore are fully compliant.
- 8.88 The Financial Viability Assessment for the scheme demonstrates that the affordable housing proposed on the site is the maximum that can be delivered on the site and is in line with policy requirements for housing overall.

9 Design and Townscape

- 9.1 This section reviews the proposals against relevant national, regional and local planning policy in term of design.

National Planning Policy

- 9.2 The Government attaches great importance to the design of the built environment in the NPPF. Section 7 of the NPPF deals with design. At paragraph 56, the NPPF states that “Good Design” is a key aspect of sustainable development and is indivisible from good planning and therefore should contribute positively to making places better for people.
- 9.3 Paragraph 57 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development proposals.
- 9.4 Paragraph 58 states that planning decisions should ensure that developments:
- **Function well and add to the overall quality of the area;**
 - **Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;**
 - **Optimise the potential of the Site to accommodate development;**
 - **Respond to local character and history, and reflect the identity of local surroundings and materials while not preventing or discouraging appropriate innovation;**
 - **Create safe and accessible environments; and**
 - **Are visually attractive as a result of good architecture and appropriate landscaping.**
- 9.5 Paragraph 60 states that “**Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.**”

- 9.6 Paragraph 61 identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environments.
- 9.7 It identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 61).
- 9.8 The NPPG Design Section, which supports section 7 of the NPPF, states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area:

“Planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting) which is not outweighed by the proposal’s economic, social and environmental benefits”.

Regional Planning Policy

- 9.9 Policies 5.3 and 7.2 of the LP seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.
- 9.10 Policy 7.3 advises that design should encourage a level of human activity that is appropriate to the location, to maximise activity throughout the day and night, creating a reduced risk of crime and sense of safety at all time.
- 9.11 Policies 7.4, 7.5 and 7.6 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the

architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.

9.12 London Plan Policy 7.6 set out a series of overarching design principles for development in London and advises that buildings should:

- **Be of the highest architectural quality;**
- **Use details and materials that complement, but do not necessarily replicate, local architectural character;**
- **Not cause unacceptable harm to the amenity of surrounding buildings;**
- **Provide high quality indoor and outdoor spaces and integrate well with surrounding streets and open spaces;**
- **Optimise the potential of sites;**
- **Promote high quality inclusive design;**
- **Incorporate best practice in resource management and climate change mitigation;**
- **Be adaptable to different activities and uses, particularly at ground level; and**
- **Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.**

Local Planning Policy

9.13 At a local level, Core Strategy Policy CS14 seeks to ensure that new developments are attractive, safe and easy to use.

9.14 The aim of Development Policy DP24 is to require all developments to be of the highest standard of design. This policy reflects the LP design and principles and goes on to state that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- a. The character, setting, context and form and scale of neighbouring buildings;**
- b. The character and proportion of the existing building;**
- c. The quality of materials to be used;**
- d. The provision of visually interesting frontages at street level;**

- e. The appropriate location for building services equipment;**
- f. The provision of appropriate hard and soft landscaping; and**
- g. The provision of appropriate amenity space; and**
- h. Accessibility.**

- 9.15 Policy C6 of the emerging Local Plan will seek to ensure that all proposals “meet the highest practicable standards of accessible and inclusive design”.
- 9.16 The emerging Local Plan contains Design guidance at Policy D1 echoes the adopted policies above, including stating that proposals should integrate well with surrounding streets, improve movement through site and create easily accessible routes to the wider area. Policy D3 specifically discusses shopfront design, stating they should be of a high quality.
- 9.17 Strategic Principle EAP 2 of the Euston Area Plan states that development should be of the highest quality and should create well connected, vibrant places. It will seek to improve the east-west links, provide active frontages, transform the public realm whilst responding to the local character and scale.
- 9.18 Camden has also published a Planning Guidance SPD, April 2011 which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape. The key messages are to consider:
- i. The context of a development and its surrounding area;
 - ii. The design of the building itself;
 - iii. The use of the building;
 - iv. The materials used; and
 - v. Public spaces.

Assessment

- 9.19 The proposed development is the result of a long design process, involving local

stakeholders and LBC as well as the design team. As recommended by LBC Officers, the development is considered to be a 'masonry-led' scheme.

- 9.20 The proposals were presented at Camden's Design Review Panel in April 2017 and received very positive comments from Members.
- 9.21 The various aspects of the scheme's design are considered in turn below. Further details on each can be found within the Design and Access Statement, prepared by MBA.

External Design

- 9.22 The proposals will significantly enhance the positives of the existing site. The proposals will respect the hierarchies of the existing roads through different materiality and bulk on Hampstead Road, the primary façade, and Drummond Street, the secondary façade. The changes in the architecture retain the hierarchy of the existing streets, with Hampstead Road as the building's primary elevation reinforced through the use of a heavier stone. As identified in the Euston Area Action Plan, the site lies between two character areas and the design respects both whilst seeking to draw them together.
- 9.23 It is proposed to create a strong feature corner with a 'lantern' at the junction of Drummond Street and Hampstead Road. At ground floor this corner will feature the entrance to the office building beneath the new double height arcade, providing a statement, distinctive entrance. This entrance also works to expand the public pavement beneath the double height arcade. The lantern will be visible from Euston Road and Tottenham Court Road beyond and will be a distinctive feature which will make the site recognisable. This lantern has been the result of an iterative design process with Camden officers.
- 9.24 At present the site features dull, tired architecture which is uniform to all elevations. It is proposed to add visual interest through a varied design that is different when viewed from different streets.
- 9.25 The Hampstead Road elevation will feature pale stone above ground floor level with fine detailing, balconies, fenestration and pocket gardens which break up the facade. Through expressing a vertical rhythm, the façade will not appear as a homogenous

block and will reflect the materiality of the surroundings. The elevation retains the massing of the existing streetscape but significantly enhances the streetscape and townscape and is split in two by the pocket gardens that divide the façade: the northern portion of the site will house residential units.

- 9.26 The Drummond Street elevation will feature a light common brick with a greater element of verticality than Hampstead Road as well as a finer grain which reflects the character and scale of this street. The parapet on this elevation is one storey lower than the Hampstead Road elevation and the lower podium level on this elevation relates better to the scale of the street.
- 9.27 It is proposed to remove the existing colonnade on Hampstead Road which is dark, inactive and prone to antisocial behaviour. The arcade will be moved to the southern end of the site, where it will be double height, and will also extend around onto Drummond Street. This ensures that the development's shopfronts on Hampstead Road are visible and gives them more prominence. Further this design adds shopfronts to Drummond Street, providing active frontages.
- 9.28 As well as a dull architecture, the existing building lacks any biodiversity. It is proposed to add three double height pocket gardens to the Hampstead Road façade of the building. These pocket gardens will be flush with the building, rather than projecting, but will be open to the front. When viewed from Hampstead Road, the pocket gardens break up the façade and add visual interest as well as demarcating the residential to the north of the site from the office floorspace to the south. To the rear it is proposed to create three 'L' shaped terraces accessed from the offices. This aspect of the design ensures that employees in the building have access to outdoor amenity space. These terraces will feature planting appropriate to the level of environmental exposure at that height, with the highest terrace's flora being 'wildest'.
- 9.29 At present, the Hampstead Road elevation features a wide pavement with poor paving and obvious services, such as manhole covers. Drummond Street, on the other hand, features a narrower pavement with a different form of pavement. It is proposed to upgrade the pavement on both elevations. The existing trees along the Hampstead Road elevation will be retained, subject to conversations with TfL.
- 9.30 It is proposed to create a holistic scheme of design for the shopfronts to reduce

visual clutter on the building and improve legibility for pedestrians using the building for its retail functions. This is compliant with emerging Policy D3.

Townscape

- 9.31 The site lies within the Wider Setting Consultation Area of the view from Greenwich Park Wolfe statue to St Paul and the Landmark Viewing Corridor from Parliament Hill to the Palace of Westminster, as set out within the Mayor's London View Management Framework (LVMF).
- 9.32 The threshold plane for the Wider Setting view is 52.86 AOD whilst the threshold plane for the Landmark Viewing Corridor view is 60.5m AOD. The roof line of the existing building is uneven; the highest points of the existing building are the southern and northern section of the Hampstead Road elevation, which rise to 53.7m AOD, with a lower section between. The existing building, therefore, breaches the threshold plane for the Wider Setting view.
- 9.33 It is proposed to standardise the height roof on the building at 53.7 AOD; it is, therefore, proposed to build within the threshold view, albeit to a very minor level. The roof that is currently beneath the threshold level will be brought up to meet the highest points of the existing building.
- 9.34 It is considered that this development within the threshold view is minor and would enhance the appearance of the building by decluttering the roof line. This has been agreed with Officers.
- 9.35 It is therefore considered that the proposals meet London Plan policies 7.4-7.6 regarding the capital's cityscape.

Internal Design

- 9.36 A large central atrium will run throughout the building, including into the basement. The atrium will vastly improve natural light within the building and as such will improve the experience of office workers. Further, the atrium will improve the visual connections throughout the building.

- 9.37 The double height entrance will open into a lobby area. This lobby area will also have access into the café on Drummond Street and will be accessible to both the public and office workers. The turnstiles to enter the office buildings will be located beyond the central lobby area.
- 9.38 The shop units on Hampstead Road will open directly onto the street, vastly improving the active frontages. The result of this ground floor design will be to improve the legibility and permeability of the building.
- 9.39 The double height pocket gardens, visible from the Hampstead Road elevation, will be accessed from the office floors. Depending on the final occupier of each floor, each pocket garden can link to the next pocket garden which would allow employees to move through the building via all three gardens.
- 9.40 The proposed office floorspace will be flexible to encourage collaboration as well as to allow the offices to adapt should practices change. The inclusion of the atrium through the building will also improve visibility which will work to foster a sense of community within the building.
- 9.41 The lantern on the corner of Drummond Street and Hampstead Road is proposed to feature glazing, providing light into the offices. In this location the floors will have an increased floor to ceiling height; this will improve sense of space for the office workers.
- 9.42 It is considered that the design has been developed through considering the existing building's benefits and constraints, the requirements of the tenants, the character of the surroundings as well as the future aspirations for the area. The development's design was the result of a long, iterative, collaborative process. It is considered that the development accords entirely with adopted and emerging policies on design.

10 Energy and Sustainability

- 10.1 This section considers the proposals against the Energy and Sustainability policies at national, regional and local level.

National planning policy

- 10.2 The NPPF sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system.
- 10.3 Section 10 of the NPPF identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 10.4 The core planning principles set out in paragraph 17 of the NPPF emphasise that planning should support the transition to a low carbon future, and encourage the effective use of land by reusing land that has been previously developed (brownfield land).
- 10.5 The Mayor's vision in the London Plan is to ensure London becomes an exemplary, sustainable world city whilst allowing London to grow in a responsible and considered socio-economic manner.

Regional Planning Policy

- 10.6 With regard to the London Plan, Policy 5.1 seeks to achieve an overall reduction in London carbon dioxide emissions of 60% (below 1990 levels) by 2025.
- 10.7 Policy 5.2 states that proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy:-
- i Be lean – use less energy;
 - ii Be clean – supply energy efficiently;
 - iii Be green – use renewable energy.

10.8 The policy suggests that major development proposals should include a detailed energy assessment to demonstrate how the minimum target for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy. The policy requires that residential buildings provide a 40% reduction CO2 emissions lower than Part L Building Regulations 2010 and be zero carbon after 2016.

10.9 Policy 5.3 states that development proposals should ensure that sustainable design standards are integral to the proposal, including its construction and operation, and ensure they are considered at the beginning of the design process. The policy further states that major development proposals should include the following sustainable design principles;

“a. minimising carbon dioxide emissions across the Site, including the building and services (such as heating and cooling systems)

b. avoiding internal overheating and contributing to the urban heat island effect

c. efficient use of natural resources (including water), including making the most of natural systems both within and around buildings

d. minimising pollution (including noise, air and urban runoff)

e. minimising the generation of waste and maximising reuse or recycling

f. avoiding impacts from natural hazards (including flooding)

g. ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions

h. securing sustainable procurement of materials, using local supplies where feasible, and

i. promoting and protecting biodiversity and green infrastructure.”

10.10 Policy 5.6 considers that development proposals should evaluate the feasibility of a Combined Heat and Power system which should seek:

- **“Connection of existing heating or cooling networks;**
- **Site wide CHP network;**
- **Communal heating and cooling.”**

10.11 Policy 5.7 seeks to increase the proportion of energy generated from renewable sources, and that the minimum targets for installed renewable energy capacity will be achieved in London. Development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

10.12 At Policy 5.9, the London Plan provides a hierarchy which should be applied to building design to reduce the effects of overheating. Applications should demonstrate how the design, materials, construction and operation of the development will achieve this.

10.13 Policy 5.10 states that the Mayor will promote and support urban greening such as new planting in the public realm which includes tree planting, green roofs and walls and soft landscaping.

10.14 Policy 5.11 encourages the use of roof, wall and Site planting, especially green roofs and walls where feasible.

10.15 Sustainable Design and Construction – The London Plan Supplementary Planning Guidance (2006) also provides detailed guidance and preferred standards for achieving sustainable design and construction.

Local Planning Policy

10.16 Core Strategy Policy CS13 requires all development to adapt to climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation.

10.17 Development Policy DP22 requires development to incorporate sustainable design

and construction measures. The Council expects that schemes must demonstrate sustainable development principles; non-domestic development of 500sqm or above should achieve “excellent” in BREEAM assessments from 2016 and domestic developments of 500sqm (except new build) or above should achieve “very good” and should be encouraging towards “excellent” in EcoHomes assessments.

- 10.18 Development Policy DP23 requires development to reduce their water consumption, the pressure of the existing sewer network and the risk of flooding.
- 10.19 Development Policy DP32 requires development to provide air quality assessments where the proposed scheme could potentially cause significant harm to air quality.
- 10.20 Emerging Policy A3 expects that developments incorporate additional trees and vegetation, where possible.
- 10.21 Emerging Policy CC2 details sustainability and construction, stating that Camden will expect new build residential to meet the Home Quality Mark and Passivehaus design standards and conversions and extensions to achieve BREEAM “excellent”. For non-domestic floorspace, the Council will expect developments to achieve BREEAM “excellent” and zero carbon from 2019.
- 10.22 Strategic Principle EAP 4 of the Euston Plan states that developments should, where possible, contribute and connect to the decentralised local energy network, minimise water consumption and provide new open space and enhancements to existing spaces.
- 10.23 On 6 April 2011 LBC adopted the Camden Planning Guidance 3 ‘Sustainability’ document to support the Local Development Framework in ensuring that the Council’s commitment to reducing carbon emissions is achieved.

Assessment

- 10.24 Energy and sustainability have been central to discussions regarding the building’s design; a pre-application meeting was held with a LBC Sustainability Officer to discuss the proposals.

- 10.25 An energy statement, prepared by GLP engineers, accompanies the application. The report demonstrates how the development achieves “compliance with building regulations 2013 Part L2A (see section 4.0 for compliance) and reduce CO2 emissions by the building fabric thermal performance and low energy technologies applied to the environmental services and efficient control of energy usage”.
- 10.26 In line with the ‘Be Lean’ and ‘Be Clean’ objective of the London Plan, the development will use less energy through;
- using high efficiency heating and cooling;
 - using LED lighting;
 - insulating walls well;
 - implementing water saving technologies; and
 - installing PV panels on the southern part of the building.
- 10.27 In terms of ‘Be Green’ of Policy 5.2, it is proposed to install PV panels on the roof of the building. The enclosed energy statement states that alternative energy technologies were discounted from the scheme as they were not considered viable for the building, this included biomass boilers, ground source heat pumps and wind turbines. The energy statement recognises that the Euston Plan makes reference to a potential future decentralised energy network but states that “At present District Heating is not available and potential scope for its future use, even in the event of a nearby network being constructed, is limited. Therefore District Heating has been discounted in terms of assessment of potential CO2 reductions to the scheme”.
- 10.28 A Residential Energy briefing note, prepared by GLP, is enclosed as part of the application. This note states that any shortfall in the CO2 emission reduction targets will be required through a financial contribution. The note states that the enhanced building fabric, efficiencies developed through servicing and the installation of PV panels will secure a 35.3% dwelling emission rate reduction. There is, therefore, a requirement to make up the remaining 4.7% to meet Part L1A; the total carbon offset payment for the proposed development is £31,775.

- 10.29 A Sustainability Statement has been prepared by Element Sustainability, which confirms that the commercial elements of the scheme will achieve a BREEAM 'Excellent' rating and that the residential elements will provide at least 35% reduction in CO2 emissions plus a payment in lieu.
- 10.30 The Energy Statement, Residential Energy Briefing Note and the Sustainability Statement confirm that proposals meet London Plan policies 5.1, 5.2, 5.3, 5.6, 5.7, 5.9, 5.10 adopted planning policies CS13, DP22, DP23 and emerging policies CC2 and A3.

11 Amenity

- 11.1 This section assesses the proposals against policy relating to the amenity of nearby existing residents in terms of daylight and sunlight and overlooking.

Daylight and Sunlight

- 11.2 Paragraph 17 of the NPPF refers to securing a good standard of amenity for all existing and future occupants of land and buildings.
- 11.3 Policy 7.6 of the London Plan states that planning decisions in respect of buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.
- 11.4 At a local level, Development Policies DP26 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 supporting text, specifically paragraph 26.3, advises that to assess whether acceptable level of daylight and sunlight are available to habitable spaces, the Council will take into account the standards recommended in the British Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011).
- 11.5 The emerging Local Plan, at Policy A1, will seek to protect the amenity of neighbours, and echoes adopted Policy SP26.

Assessment

- 11.6 A meeting was held with LBC to discuss the daylight and sunlight implications of the development.
- 11.7 An assessment of the impact of the development on surrounding buildings has been completed by Point 2 Surveyors and is enclosed here. The internal impact on daylight and sunlight has also been assessed and will also be submitted alongside the application.

- 11.8 In terms of external impact, the report confirms that “despite the dense urban context and significant number of residential properties surrounding the site, the rate of compliance with typical BRE guidelines recommendations is very high”. In total, 89.7% of the habitable residential windows around the site meet the typical BRE recommendations in respect of Vertical Sky Assessment (VSE). An analysis using the non-sky line (NSL) method demonstrates that 86.3% of habitable residential rooms will meet the typical BRE regulations. In terms of sunlight, the report confirms that overall 99.7% of habitable residential windows meet the guidelines.
- 11.9 Where any reductions beyond the typical recommendations occur, these are minor reductions of 20% to 30%. The report concludes that “the daylight and sunlight effect to the surroundings is considered to be reasonable and proportionate, with a very good rate of compliance with the BRE standards for a relatively large scale redevelopment in a dense urban setting of this type”.
- 11.10 It is therefore considered that the proposals will not impact the amenity of the residents, therefore complying with LBC policies DP26 and A1.

Noise

- 11.11 NPPF paragraphs 109 and 123 are the primary source of planning guidance with respect to noise.
- 11.12 Paragraph 109 states ‘The planning system should contribute to and enhance the natural and local environment by, inter alia, preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution’.
- 11.13 Paragraph 123 adds “**Planning policies and decisions should aim to:**
- **avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;**
 - **mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;**
 - **recognise that development will often create some noise and existing**

businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established (subject to the provisions of the Environmental Protection Act 1990 and other relevant law); and

- **identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”**

11.14 City Soundings: The Mayor’s London Ambient Noise Strategy (2004) sets out the Mayors guidance on how to minimise the adverse effects of noise on people living, working and visiting London. The Strategy aims to work towards a more compact city development while minimising noise. It states that careful consideration should be taken of the adverse effect that noise can have on, from, within or in proximity to a development.

11.15 Policy DP28 of Camden’s Development Policies states that the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for:

- a. Development likely to generate noise pollution; or
- b. Development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided.

11.16 DP28 states that development that exceeds Camden’s noise and vibration thresholders will not be permitted. The Council will only grant permission for plant or machinery if it can be operated without causing harm to amenity and does not exceed their noise thresholds.

11.17 DP28 also states that the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these phases are likely to cause harm, conditions and planning obligations may be used to minimise the impact.

11.18 Following DP28 in the Development Management Plan are 5 tables, which outline the noise levels, vibration levels and noise emitted from plant at which planning permission, for residential schemes adjoining roads, will not be granted or will

require attenuation.

- 11.19 Policy A4 of the emerging Local Plan will seek to ensure that noise and vibration is controlled.

Assessment

- 11.20 A noise report, prepared by 24Acoustics, is enclosed with the application. This report concludes that noise within the habitable rooms tested will comply with LBC requirements when the proposed mitigation measures of high quality glazing and ventilators have been implemented. It is therefore considered that the development complies with policy DP28 of the Local Plan and emerging Policy A4.

Air Quality

- 11.21 Paragraph 124 of the NPPF states that planning decisions should ensure that any new development in AQMA's is consistent with the local air quality action plan.
- 11.22 London Plan Policy 7.14 (Improving Air Quality) is also relevant which seeks that development proposals minimise increased exposure to existing poor air quality and promote sustainable design and construction to reduce emissions from the demolition and construction of buildings. The Mayor's Air Quality Strategy also provides a framework of policy which aims to improve air quality in London.
- 11.23 At a local level, policy DP32 provides guidance on air quality, stating that "the Council will require an Air Quality Assessments (AQA) where development could potentially cause significant harm to air quality. Mitigation measure will be expected in developments that are located in areas of poor air quality".
- 11.24 Emerging Local Plan Policy A1 seeks to mitigate impact of odour, fumes and dust arising from development and Policy CC4 echoes adopted DP32 regarding the requirements for AQA.

Assessment

- 11.25 An Air Quality Report, prepared by Phlorum Ltd, is enclosed with the application.

The report notes that the proposed building's most sensitive land use will be the residential units, located on the northern portion of the site. In order to reduce exposure of the future residents to poor air quality, the report recommends that mechanical ventilation should be provided to rooms on the street-facing facades. The report states that there will be no significant impacts on air quality during construction provided that the appropriate mitigation measures are implemented. Finally it concludes that "the proposed development should be acceptable in terms of its impact on, and sensitivity to, local air quality".

- 11.26 The report therefore demonstrates that the proposals will comply with adopted policy DP32 and emerging policy A1.

Flood Risk

- 11.27 The NPPF requires that all development proposals take flood risk into account and new development should reduce the risk of flooding.
- 11.28 The NPPF states that when determining planning applications, LPAs should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where it can be demonstrated that within the development site, the most vulnerable development is located in areas of lowest flood risk.
- 11.29 Policy 5.11 of the London Plan supports the provision of green roofs within development to assist in sustainable urban drainage systems.
- 11.30 Policy 5.12 of the London Plan deals with flood risk management and states that development proposals must comply with the requirements set out in PPS25 (now superseded by the NPPF) over the lifetime of the development, while taking into account the Thames Estuary 2100 proposals.
- 11.31 The London Plan identifies that the frequency and consequences of fluvial, surface water and sewer flooding are likely to increase as a result of climate change and identifies sustainable urban drainage systems (SuDS) as key to ensuring that long-term flood risk is managed.
- 11.32 Policy 5.13 of the London Plan promotes the use of SuDS to reduce the contribution

of climate change to flooding and seeks to ensure that surface water runoff is managed as close to its source as possible.

11.33 At a local level, guidance on flood risk is contained within DP23 which discusses Water generally. The policy states that the Council will reduce **“the pressure on the combined sewer network and the risk of flooding by:**

- a. **incorporating water efficient features and equipment and capturing, retaining and re-using surface water and grey water on-site;**
- b. **limiting the amount and rate of run-off and waste water entering the combined storm water and sewer network through the methods outlined in part a) and other sustainable urban drainage methods to reduce the risk of flooding;**
- c. **reducing the pressure placed on the combined storm water and sewer network from foul water and surface water run-off and ensuring developments in the areas identified by the North London Strategic Flood Risk Assessment and shown on Map 2 as being at risk of surface water flooding are designed to cope with the potential flooding;**
- d. **ensuring that developments are assessed for upstream and downstream groundwater flood risks in areas where historic underground streams are known to have been present; and**
- e. **encouraging the provision of attractive and efficient water features”.**

11.34 Policy CC3 of the emerging Local Plan will seek to incorporate Sustainable Drainage Systems in line with the drainage hierarchy.

Assessment

11.35 A Sustainable Urban Drainage Strategy has been prepared by UK Flood Risk Consultants and submitted with the application. This report states that the site is not appropriate for open ground attenuation system due to the limited space available on the site. It recommends that a water storage tank is added which will then discharge into the existing sewer.

- 11.36 In addition to the SUDs report, a Drainage Statement has been prepared by GLP; this confirms that surface water run-off from the proposed development can be effectively managed without increasing the flood risk elsewhere in the vicinity of the development.
- 11.37 These reports confirm that the site will not impact flood risk elsewhere in the borough due to the location and proposed SUDs system. The proposals therefore accord with the London Plan strategic policies and Camden policies DP23 and CC3.

12 Transport and Servicing

- 12.1 This section assesses the proposals against relevant transport and servicing policies at all spatial scales.

National

- 12.2 At a national level, Chapter 4 of the NPPF promotes methods of sustainable transport.
- 12.3 Paragraph 24 states that plans and decisions should ensure developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 12.4 Paragraph 29 states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel, stating that solutions that support reductions in greenhouse gas emissions and reduce congestion should be considered.
- 12.5 Paragraph 37 states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, leisure, education and other activities.
- 12.6 Paragraph 39 of the NPPF also provides guidance on the setting of car parking standards. It advises that local planning authorities should take a number of factors into account for both residential and non-residential development when setting local parking stand the accessibility of the development;
- **the type, mix and use of development;**
 - **the availability of and opportunities for public transport;**
 - **local car ownership levels; and**
 - **an overall need to reduce the use of high-emission vehicles.**

Regional policy

12.7 Policy 6.1 of the London Plan seeks to ensure the integration of transport and development by a number of strategic measures including:

- “a) Encouraging patterns and forms of development that reduce the need to travel, especially by car;**
- b) Improving public transport capacity and accessibility, where it is needed, for areas of greatest demand and areas designated for development and regeneration; and**
- c) Supporting high trip generating development only at locations with high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development.”**

12.8 At a regional level, London Plan Policy 6.3 states that “development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed”. The policy also indicates that transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice guidance for major planning applications

12.9 London Policy 6.9 states that the Mayor will work with all relevant partners to bring about a significant increase in cycling in London, so that it accounts for at least 5 per cent of modal share by 2026. In order to meet this target, developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards and provide on-Site changing facilities and showers for cyclists.

12.10 London Plan Policy 6.9 provides the minimum cycle parking provision as follows:

Residential floorspace

- Long stay – 1 space per studio / 1b flat, 2 spaces for all other dwellings; and
- Short stay – 1 space per 40 units in the development.

Office floorspace

- Long stay – 1 space per 90sqm
- Short stay – 1 space per 500 sqm for the first 5000 sqm and thereafter 1 space per 5000sqm

D1 use (Health care centre)

- Long stay – 1 space per 5 staff
- Short stay – 1 space per 3 staff

12.11 London Plan Policy 6.10 indicates that the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle – promoting simplified streetscape, de-cluttering and access for all.

12.12 Policy 6.13 of the London Plan states that an appropriate balance must be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. The Policy states that new developments should adhere to the parking standards in respect of car and cycle parking, and also meet the minimum disabled parking standards stating that developments should also ensure that 1 in 5 spaces (active and passive) provide an electrical charging point to encourage the uptake of electric vehicles, and provide for the servicing and delivery needs of commercial uses.

12.13 The London Plan sets out car parking spaces for residential development in the capital for 'central', 'urban' and 'suburban' locations based on a site's Public Transport Accessibility Level (PTAL) rating.

Local Planning Policy

12.14 At a local level, Core Strategy Policy CS11 seeks to promote the delivery of transport infrastructure and the availability of sustainable transport choices, to support Camden's growth, reduce the environmental impact of travel and relieve pressure on the borough's transport network.

12.15 Development Policy DP16 seeks to ensure that development is properly integrated

with the transport network and is supported by adequate walking, cycling and public transport links.

- 12.16 Development Policy DP17 seeks to promote walking, cycling and public transport use, and as such, development should make suitable provision for pedestrians, cyclists and public transport.
- 12.17 Development Policy DP18 and Emerging Local Plan Policy T2 states that development should provide the minimum necessary car parking provision. In the Central London Area the Council will expect development to be car free.
- 12.18 The Council will strongly encourage contributions to car clubs and pool car schemes in place of private parking in new developments across the borough, and will seek the provision of electric charging points as part of any car parking provision.
- 12.19 To assess the overall implications of developments LBC, under policy DP16, expects the submission of a Transport Assessment where the implications of proposals are significant.
- 12.20 Policy C6 of the emerging Local Plan will expect secure car parking for disabled people whilst Policy CC5 will require that developments include facilities for the storage and collection of waste and recycling.
- 12.21 Strategic Principle EAP 3 of the Euston Plan states that proposals will need to be car-free and incorporate measures to promote walking and cycling.

Assessment

- 12.22 A transport assessment, prepared by RPG, has been prepared and enclosed with the application.
- 12.23 As existing there are 73 car parking spaces on the site. Given both the Mayor and LBC's approach to car parking, it is proposed to remove all but 4 car parking spaces on site in the basement. These 4 car parking spaces will be retained for use by Blue Badge holders only. Based on adopted policy, the development could provide 20- 22 parking spaces and remain compliant with London Plan and LBC adopted policy

respectively. The Emerging Local Plan support car free development within the borough with the exception of the disabled parking; the development complies entirely with this.

- 12.24 The significant reduction in car parking spaces means that the ramp will be used far less frequently and it is considered appropriate to reduce the car park access from the separate access / egress lanes as existing to a single lane. It is proposed to retain vehicular access to the site from Drummond Street. The existing kerb lines at the access to the basement would be realigned as part of the proposed redevelopment. In addition, dropped kerbs and tactile paving would be reinstated on the northern side of Drummond Street to ensure that pedestrian travel along this section of the footway is not compromised.
- 12.25 In terms of cycle parking spaces for the commercial floorspace, it is proposed to provide a total 191 spaces for long stay cycles located in the basement, adjacent to the car parking bays, as well as 58 short stay spaces. These spaces would continue to be accessed via the existing ramp from Drummond Street. In addition to cycle stores, there will be lockers and showers for use by office works in the basement. In terms of residential cycle storage, there will be a separate store with space for 40 cycles. The cycle parking will be provided in “Camden” stand which is a new form of Sheffield cycle stand. Further, there is significant cycle parking provision on the street in the local area which could accommodate any additional cycle parking required but it is considered that the proposed on-site provision will be in excess of the demand anticipated.
- 12.26 In terms of trip generation, the report concludes that the proposed development, in terms of all modes of transport, will not represent a significant increase in trips. There would be a net reduction in two-way vehicle movements to the site due to the significant reduction in car parking on site; this represents a benefit to the local highway network. There would, however, be a slight increase in office servicing due to the increase in provision.
- 12.27 As existing, this site benefits from an off-street delivery and servicing bay at ground floor level, access via Drummond Street. Any large vehicles are required to undertake deliveries on street, in accordance with the existing carriageway restrictions. It is proposed to retain this off-site servicing and it is proposed that this

area also accommodates the refuse and cycling store for the office use, whilst a separate bin store for the residential units will be located in the north east corner of the site.

- 12.28 The existing off-street servicing features a turntable however this is not functional meaning that delivery vehicles must reverse out of the servicing bay, rather than re-entering Drummond Street forward. It is proposed to repair and reinstate this turntable to enable vehicles to exit the building in forward gear. The Transport Statement contains a swept path assessment of the basement area to identify the largest delivery vehicle that can be accommodated within the internal servicing area. It is considered, therefore, that the scheme improved on the current arrangements.
- 12.29 As existing, servicing from Hampstead Road is strictly forbidden with the exception of one loading bay outside the retail units; this bay has servicing restrictions limiting the use from 08:00 to 16:00 for 20 minutes only. This bay is proposed to be retained but since the retail floor area has reduced slightly, it is considered that this would be used less intensively. This would result in a positive impact on both the local high way network as well as for the amenity of neighbours and building users.
- 12.30 It is considered that the building complies with adopted planning policy on servicing and deliveries as the site will accommodate many deliveries on site and will be located in proximity to the TfL road networks.
- 12.31 It is therefore considered that the scheme complies with London Plan policies 6.1, 6.3, 6.9, 6.10 and 6.13 as well as Local Policies, CS11, DP16, DP17, DP18, T2, C6, CC5 and EAP3.

13 Summary and Conclusions

- 13.1 It is proposed to refurbish Stephenson House to provide new high quality offices, including space for SMEs, retail floorspace, flexible B1/D1 space as well as 17 residential units, including 6 affordable homes. In addition a suite of landscaping and greening works are proposed.
- 13.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 13.3 This Planning Statement has assessed the proposals against the development plan and other relevant planning policy and guidance at national, regional and local policy level, including emerging planning policy.
- 13.4 The application presents an exciting opportunity to deliver a building of the highest architectural quality which provides efficient, flexible fit-for-purpose office floorspace to meet modern day demand, widening and enhancing the building's retail provision and both market and affordable homes in a highly accessible location.
- 13.5 In addition to the mix of land uses, the proposals improve the urban realm, through the inclusion of greenery on and within the building, as well as the pedestrian experience, by activating the existing 'dead' frontages along Drummond Street and removing the existing dark colonnade on Hampstead Road.
- 13.6 The proposals represent an opportunity to cement a strong, new identity for the site and wider area, which is expected to undergo significant transformation in the future as HS2 is developed. Through high quality architecture, the proposals represent the changing character of the area as a gateway into the capital.
- 13.7 It is considered that the proposals satisfy and exceed planning policies at national, regional and local levels and accords with national, regional and local policy objectives to deliver sustainable, mixed use and balanced communities.

