

Address:	Stephenson House, 75 Hampstead Road London NW1 2PL		4
Application Number(s):	2017/3518/P	Officer: Jonathan McClue	
Ward:	Regents Park		
Date Received:	19/06/2017		
<p>Proposal: Extensive internal and external refurbishment of Stephenson House to provide a ground plus 7 storey building containing 16,709sqm (GIA) of office (B1) floorspace, 904sqm (GIA) of flexible office/healthcare (B1/D1) floorspace, 857sqm (GIA) of retail (A1) floorspace, 118sqm (GIA) of cafe (A3) floorspace and 17 residential (C3) units (total 2,296.8sqm GIA), comprising 11 market units (1x1 bed, 6x2 bed, 4x3 bed) and 6 affordable units (3x2 bed and 3x3 bed). The works include the removal of existing colonnade to Hampstead Road elevation, creation of double height entrance on Hampstead Road, multiple storey extensions and infills to the building, 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 spaces and associated landscaping and works.</p>			
<p>Background Papers, Supporting Documents and Drawing Numbers:</p> <p>Existing Drawings: A-0001-PL; A-(0101-0110)-PL; A-(0130-0136)-PL and A-(0140-0141)-PL.</p> <p>Proposed Drawings: A-0002-PL; A-0201-PL Rev B; A-0202-PL Rev A; A-0203-PL; A-(0204-0209)-PL Rev A; A-(2010-0211)-PL; A-(0300-0306)PL; A-(0400-0401)-PL; SK-143 and SK-144.</p> <p>Supporting Documents: Drainage Statement Report Rev P01 dated June 2017; Design and Access Statement dated 01/10/2017 (Rev A); A Financial Viability Assessment in support of the Planning Application dated June 2017; Energy Statement Rev P02 dated June 2017; Internal Daylight Report dated July 2017; Desk Study Report dated July 2017; Residential Energy Strategy Notes; Affordable Housing Statement dated July 2017; Sustainability Statement (ref: 2017.041) dated June 2017; Delivery and Servicing Management Plan (ref: JDF/JLLS/16/3476/TN01) dated June 2017; Travel Plan (ref: WTT/JLLS/3473/TP01) dated June 2017; Transport Statement (ref: WTT/JLLS/16/3473/TS01) dated June 2017; Landscape Design - Design and Access Statement dated June 2017; Air Quality Assessment dated June 2017; Planning Statement (ref: LJW/CKE/VHA/J10346) dated June 2017; Biodiversity Report dated June 2017; Noise Impact Assessment (ref: R6723-1 Rev 1) dated 19/05/2017; Statement of Community Involvement dated June 2017; Planning Stage Construction Methodology Rev 1 dated June 2017; Surface Water Drainage (SuDS) Strategy (ref: QFRA 649) dated 10/03/2017; Daylight and Sunlight Report dated June 2017; Thermal Comfort Analysis (ref: Z8810A) dated 08/09/17; L1A 2013 - Regulations Compliance Report; Surface Water Disposal Strategy dated September 2017 and Addendum Note for the Financial Viability Assessment dated 16/08/2017.</p>			
<p>RECOMMENDATION SUMMARY: Grant Conditional Planning Permission Subject to a Section 106 Legal Agreement</p>			

Applicant:	Agent:
Lazari Properties 2 Limited c/o Agent	Gerald Eve 72 Welbeck Street London W1G 0AY

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA)
Existing	A1 - Shop		918m ²
	B1 – Business		10,790m ²
	Flexible D1/B1 - Non-Residential Institution/Business		1,725m ²
	Plant (sui generis)		170m ²
	Car parking/servicing (sui generis)		3,829m ²
	TOTAL		17,432m²
Proposed	A1 - Shop		857m ²
	B1 - Business		16,709m ²
	Flexible D1/B1 - Non-Residential Institution/Business		904m ²
	A3 - Restaurants and Cafes		118m ²
	C3 - Dwelling House		2,296.8m ²
	Commercial plant (sui generis)		772m ²
	Car parking/servicing (sui generis)		696m ²
	TOTAL		22,352.8m²

Residential Use Details:						
	Residential Type	No. of Bedrooms per Unit				
		1	2	3	4	Total
Market	Flats	1	6	4	0	11
Social-Affordable Rent	Flats	0	3	3	0	6
TOTAL - All	Flats	0	9	7	0	17

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	73	0
Proposed	0	4

OFFICERS' REPORT

Reason for Referral to Committee: This application is reported to the Planning Committee because it is a major development involving the construction of more than 10 new dwellings and more than 1000m² of non-residential floorspace (part 3(i)).

1 SITE

- 1.1 The application site contains a seven storey building which predominately fronts Hampstead Road (eastern side) taking up the entire frontage between Drummond Street and William Road (see Figure 1 below). The building contains a number of uses including office space (B1a), an NHS health centre (subject to a flexible B1/D1 permission) and a small parade of retail units (A1). It has a total floor area of 17,432m² (GIA) and includes a basement level with 73 car parking spaces. Vehicular access is gained from Drummond Street at the site's southern frontage.

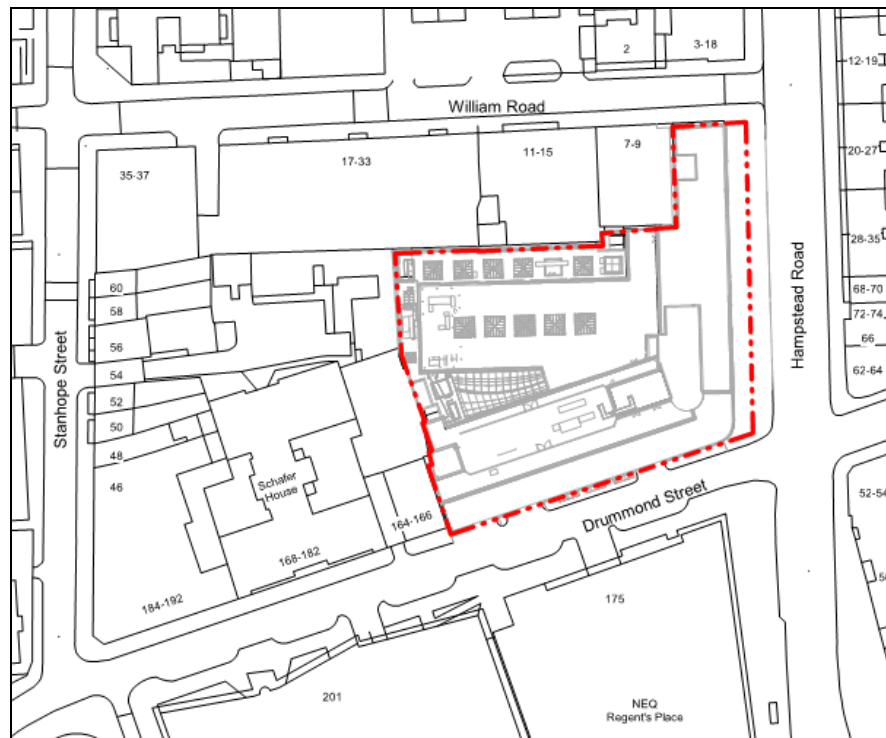


Figure 1 (above): Application site (outlined in red) and immediate surroundings

- 1.2 The main entrance to the offices lies on the junction of Hampstead Road and Drummond Street and includes a double height glass frontage with reception and part mezzanine level behind. The corner and façade of the building along Drummond Street sit behind a two-storey element. Along Drummond Street are access doors, the main entrance for South Camden Centre for Health (NHS) and servicing entrances including three roller shutter doors. Next to the office reception on Hampstead Road is a colonnade running down to the corner with William Road. Behind the colonnade are

recessed shopfronts of retail units, which are currently occupied by Sax Wind Brass (a collection of musical instrument retailers specialising in saxophones, flutes and brass). The William Road elevation, apart from the colonnade and return of the shop fronts, has a largely blank gable at upper levels and a secondary core for the building with exits/entrances at street level. The building has a generous setback from Hampstead Road creating a wide footpath. Part of the footpath belongs to Transport for London (TfL) and is a designated Red Route. The edge of the pavement is lined with Chinese Dawn Redwoods and other paraphernalia includes parking/speeding signs, a phone box, streetlights, and BT cabinets.

- 1.3 The local area is highly accessible via public transport, Warren Street London Underground Station is located approximately 200 metres to the south, with the site benefitting from a PTAL of 6b (highest possible). The site falls outside of any conservation areas (Westminster City Council conservation areas along with Camden's Regent's Park and Bloomsbury lie nearby) and there are no listed buildings on or immediately adjacent to the site. In close proximity to the site are two locally listed buildings on William Road including Hampstead House (diagonally opposite (Ref63)) and 7-15 William Road (adjacent (Ref 66)). Both of these buildings contribute to the Architectural and Townscape Significance of the Borough.
- 1.4 The site is very important for a number of reasons, including: its proximity/connection to an expanding Central London, as a key junction and route between Euston and Regent's Park/Westminster (especially once HS2 is completed), and as a site at the heart of an area of imminent significant change (being located just outside a growth area). The site is within the Euston Area Plan in the Regent's Park Estate Character Area. The Plan mentions Drummond Street as a key east-west link (also as potential for a new/improved crossing at the junction with Hampstead Road) and active ground floor uses and shop front improvements are encouraged. The application site is within the Central London Area, the strategic view from Parliament Hill to Westminster and the background of the strategic view from Greenwich to St Paul's.

2 THE PROPOSAL

- 2.1 Planning permission is sought for the extensive internal and external refurbishment of the building (Stephenson House) to provide a ground plus 7 storey structure containing 16,709m² of office (B1) floorspace, 904m² of flexible office/healthcare (B1/D1) floorspace, 857m² of retail (A1) floorspace, 118m² of cafe (A3) floorspace and 17 residential (C3) units (total 2,296.8m²) (all figures in GIA). The proposed development includes the infilling of the existing colonnade on the Hampstead Road elevation, creation of a double height entrance on Hampstead Road, multiple storey extensions and infills to the building, creation of office terraces to the front and rear, three integral pocket gardens to the Hampstead Road elevation and balconies facing Hampstead Road to all residential units.

- 2.2 The proposed development would maintain the existing concrete structure of the building and extend, where relevant, using a lighter steel structure. The resulting building would be 8 storeys in height (plus plant), with the upper floor of the Hampstead Road elevation and the upper two floors (plus plant) of the Drummond Street elevation setback. The proposal includes no changes to the depth or footprint of the basement. External alterations/extensions to the building include the infilling of the Drummond Street elevation over floors 2-5 with a two storey (plus plant) setback element, extension to the 7th floor on top of the Hampstead Road elevation, the infilling of the corner of Drummond Street and Hampstead Road at floors 2-6 and the infilling to the rear of the building (to create office space and rear terraces) at floors 2-7. An atrium extending from roof level to basement and a lantern (with a pleated glazed façade) on the Drummond Street/Hampstead Road corner infill are also proposed. The materials include predominantly stone and brick.
- 2.3 The residential provision includes 11 market units (1x1 bed, 6x2 bed, 4x3 bed) and 6 affordable units (3 x2 bed and 3x3 bed).
- 2.4 Terraces and balconies are included throughout the scheme. For the residential uses this includes from floors 2-7 facing Hampstead Road and to the second floor rear. The offices would benefit from external terraces on floors 2-4 to the rear, pocket gardens on floors 2-4, and terraces on floors 7 (facing Hampstead Road) and 6 (facing Drummond Street).
- 2.5 249 commercial cycle parking spaces are included (mostly within the basement accessed from Drummond Street) along with 33 residential cycle parking spaces adjacent to the residential entrances on Hampstead Road. A loading bay and space for servicing is provided at ground floor on Drummond Street and 4 disabled car parking spaces would be within the basement.
- 2.6 Plant is proposed within the basement and on the roof on Drummond Street.
- Revisions
- 2.7 The scheme was amended to provide 6 x social-affordable rent units instead of 4 x social-affordable rent units and 2 x intermediate units. This was negotiated by officers following viability discussions and concerns raised over the blended offer and its attractiveness to a Housing Association.

3 RELEVANT HISTORY

- 3.1 The existing building was constructed in the 1960s and was re-clad in the 1980s. The most relevant planning applications for the site and surrounding buildings are listed below.

The site

- 3.2 **8701143:** Recladding of external elevations including additional plant on roof. Granted on 29/07/1987
- 3.3 **8903496:** Installation of a new shopfront for the showroom at ground floor level. Granted on 23/10/1989

- 3.4 **PS9705336:** Change of use of part ground floor of Drummond Street frontage from retail (Class A1) and photographic studio (Class B1(c)) to office use (Class B1). Granted on 20/02/1998
- 3.5 **2007/3978/P:** 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. Granted on 26/03/2009
- 3.6 **2009/2234/P:** Installation of automatic glazed doors and canopy on the Drummond Street elevation at ground floor level to offices (Class B1). Granted on. Granted on 29/07/2009
- 3.7 **2009/4100/P:** Change of use of ground floor from Office (Class B1) to flexible Health Care (Class D1) use/Office (Class B1) use, including ancillary use of existing loading bay and basement. Granted on 05/10/2009
- 3.8 **2009/5042/P:** Amendments to planning permission 2007/3978/P granted on 26/03/2009 for the 'Change of use and works of conversion of 65 Hampstead Road (Class A4 - Public House) to Offices (Class B1a)', including ground and first floor infill extension to front of 67-87 Hampstead Road and replacement glazing to Hampstead Road and Drummond Street elevations.

Surrounding area

North East Quadrant (NEQ), Regents Place

- 3.9 **2007/0823/P:** Planning permission was granted on 25/03/2009 for the construction of a 26 storey block comprising 101 residential units, an 8 storey block with 70 affordable units and another block (maximum 16 storeys) with office floorspace and flexible retail/financial and professional services/restaurant/pub/community facility uses.

4 CONSULTATION SUMMARY

Statutory Consultees

- 4.1 Historic England (HE) on 17/07/2017 – Confirmed that they considered the application and do not have any comments.
- 4.2 Westminster City Council on 17/07/2017 – No objection.
- 4.3 London Borough of Lambeth – Consulted on 10/07/2017. A response has not been made.
- 4.4 Greater London Authority on 18/08/2017 – Confirmed that the details of the development were assessed and given the scale and nature of the proposals, the scheme does not give rise to any strategic planning issues. Therefore, the Mayor of London does not need to be consulted further on the application and the Council has been instructed to proceed with determination.

- 4.5 Thames Water on 07/07/2017 - Advised that with regard to sewerage infrastructure capacity, they do not have any objection to the planning application. Informatives regarding permits and groundwater discharging and flow rates were suggested. Thames Water advised that they have no objection with regard to water infrastructure capacity.
- 4.6 Transport for London (TfL) on 04/09/2017 – TfL are satisfied that the application is unlikely to produce any severe negative strategic transport impacts. The reduction in car parking and London Plan compliant cycle parking are welcome. TfL supports the Council's securing of a Travel Plan, Construction Management Plan, associated monitoring fees and the contribution towards local pedestrian, walking and cycling improvements. It was confirmed that a S278 agreement would be required between the applicant and TfL.

Local Groups

- 4.7 West Euston Partnership (WEP) on 09/08/2017 -

'West Euston Partnership (WEP) would like to formally give its support to the planning application for the Stephenson House redevelopment for the following reasons:

- Lazari Investments Ltd has carried out a thorough consultation process.*
- WEP trustees have met with both Lazari brothers and discussed the redevelopment at various meetings where support for the redevelopment was unanimous.*
- The local community will benefit from job and training opportunities provided through the S106 monies.'*

Camden Design Review Panel (DRP)

- 4.8 The scheme was taken to the DRP for a formal review meeting on the 21st of April 2017. Overall, the panel was highly complementary towards the proposal and made a few suggestions. The summary from the formal report is copied below:

'Summary

The panel wishes to make suggestions and to comment on details of the scheme, but expresses its overall support for what it considers to be a high quality proposal backed by detailed and comprehensive work. Both the idea of using landscaped terraces to bring softness and colour to the interior of the block, and the way the main façade mediates between residential and office elements, are imaginative ideas. The panel suggests further consideration of how the distinctive character of the Drummond Street area could be more directly reflected, particularly through the landmark corner lantern, as well as in

the size of retail units, and in the way the building relates to the public realm at ground floor level. Further work is also needed to ensure the residential units create the highest possible quality of life. This should include investigating whether the flats could be moved into the centre of the site away from the noise and poor air quality of Hampstead Road. Pocket gardens facing Hampstead Road also need to be pleasant, useable spaces.....'

Adjoining Occupiers

<i>Number of letters sent</i>	0
<i>Total number of responses received</i>	1
<i>Number in support</i>	0
<i>Number of objections</i>	0

- 4.9 4 site notices were displayed from 29/06/2017 on the corners and frontages of the application site. An advert was made in the local press on 19/07/2017. No comments from surrounding occupiers were received. Only one comment was received from an occupier at 116 Drummond Street. The comment was in relation to the preference of the brick colour on this façade to be of a warm yellow stock brick. Officers note that the details of the brick would be secured by planning condition.

5 POLICIES

- 5.1 Set out below are the LDF policies that the proposals have primarily been assessed against. It should be noted that recommendations are based on the assessment of the proposals against the development plan taken as a whole together with other material considerations. In making the recommendations, account has been taken of all relevant statutory duties including section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990
- 5.2 **National Planning Policy Framework 2012**
On 27th March 2012, the Government published the National Planning Policy Framework (NPPF). The policies contained in the NPPF are material considerations, which should be taken into account in determining planning applications.
- 5.3 **The London Plan 2016**
- 5.4 **Mayor's Supplementary Planning Guidance**
- 5.5 **Camden Local Plan 2017**
G1 (Delivery and location of growth)
H1 (Maximising housing supply)
H2 (Maximising the supply of self-contained housing from mixed-use schemes)
H4 (Maximising the supply of affordable housing)
H6 (Housing choice and mix)

H7 (Large and small homes)
C1 (Health and well-being)
C2 (Community facilities)
C5 (Safety and security)
C6 (Access for all)
E1 (Economic development)
E2 (Employment premises and sites)
A1 (Managing the impact of development)
A2 (Open space)
A3 (Biodiversity)
A4 (Noise and vibration)
D1 (Design)
D2 (Heritage)
D3 (Shopfronts)
CC1 (Climate change mitigation)
CC2 (Adapting to climate change)
CC3 (Water and flooding)
CC4 (Air quality)
CC5 (Waste)
TC1 (Quantity and location of retail development)
TC2 (Camden's centres and other shopping areas)
TC4 (Town centre uses)
T1 (Prioritising walking, cycling and public transport)
T2 (Parking and car-free development)
T3 Transport infrastructure)
T4 (Sustainable movement of goods and materials)
DM1 (Delivery and monitoring).

5.6 Supplementary Planning Policies

Camden Planning Guidance (CPG)

- CPG1 Design 2015
- CPG2 Housing 2015
- CPG3 Sustainability 2015
- CPG5 Town centres, retail and employment 2013
- CPG6 Amenity 2011
- CPG7 Transport 2011
- CPG8 Planning obligations 2015

5.7 Other documents

Intermediate Housing Strategy (HASC/2016/08)

Euston Area Plan

Camden Local List

ASSESSMENT

The principal considerations material to the determination of this application are considered in the following sections of this report:

6	Consultation
7	Land Use
8	Housing Mix, Unit Size and Quality of Accommodation
9	Affordable Housing
10	Design and Character and Appearance
11	Neighbouring Amenity
12	Transport and Access
13	Nature Conservation and Biodiversity
14	Sustainable Design and Construction
15	Air Quality
16	Trees and Landscaping
17	Flooding and Drainage
18	Community Safety
19	Waste
20	Local employment and procurement
21	Play and Open Space
22	Contaminated Land
23	Section 106 Obligations
24	Community Infrastructure Levy (CIL)
25	Conclusion
26	Legal Comments

- 6.1 A 'Statement of Community Involvement (SCI)' was submitted with the application setting out the pre-application consultation with various stakeholders and local people. The consultation included a well-publicised public exhibition held in close proximity to the development site (Lazari Maple House, located 200m to the south of the site on Warren Street). The exhibitions were held on Thursday 4 May 2017 between 17:00–20:00 and Saturday 6 May 2017 between 10:00–14:00. Alongside this the applicant held an on-going series of meetings, briefings and presentations throughout the process. In total, 14 people responded formally to the consultation. The proposals and exhibition boards are available to download or view online. 42 site visits by 30 unique visitors were made between April and June. The feedback was broadly positive, with the majority of respondents welcoming the proposals.
- 6.2 Consultations took place with Third Age Project (a self-help charity based on the Regents Park Estate), Sax Wind Brass (current retailer within application site), Regents Place Management Team (landowners of the site to the south) and West Euston Partnership (community charity who help residents with employment, health and other community related activities).
- 6.3 In response to the consultation received the applicant made changes to the proposal. These include the improvement of the activation strategy along Drummond Street, providing better quality space for small and medium enterprises (SMEs) and creating additional commercial/retail space at ground floor level.

7 Land use

Existing situation

- 7.1 The host building predominantly contains office space (B1a), an NHS health centre (South Camden Centre for Health) (D1) and retail space (A1).
- 7.2 Stephenson House is owned by Lazari Properties 2 Ltd ('Lazari'), a subsidiary of Lazari Investments Ltd, who are the applicants of the planning application. Lazari lease the entire building to Logica, which means that all the existing occupiers within Stephenson House are sub-tenants of Logica. Logica's lease expires on 31 October 2018. Subject to the granting of planning permission, Lazari's aspiration is to start works on-site after the 31st October 2018 when they will get vacant possession of the building. It is anticipated that following vacant possession, the construction works will take a period of approximately two years to complete.
- 7.3 The applicant (Lazari) has confirmed that they are open to discussions to re-provide floorspace to all existing tenants within the new development; however, they are sympathetic that some tenants may not want to relocate to a temporary premises for the two-year construction period and then move back to Stephenson House following completion. Lazari have sought to aid in the relocation and/or re-provision of the existing tenants. As summarised in the consultation section (above), Lazari held a public exhibition prior to the submission of the planning application and all of the existing tenants of

Stephenson House were invited to come and view the proposals and talk to Lazari and the consultant team. Follow-up letters and emails were sent to the existing occupiers offering one-on-one meetings to discuss the opportunity for relocation and re-provision within the redevelopment.

- 7.4 Office use – The employment space occupies the vast majority of the site with an area (GIA) of 10,790m² (approximately 80% of the floorspace when the plant and car parking are discounted). Its main entrance and reception area (see Figure 2 below) is on the ground floor near the corner of Hampstead Road and Drummond Street. The offices are contained within this corner of the ground floor and over the entirety of the floors above (first to sixth). The existing office tenants of the building include the Central & North West London NHS Foundation Trust (CNWL), Camden Clinical Commissioning Group (CCG), Hillgate Travel and Guoman Hotels Limited. Discussions are ongoing between the applicant and their property consultants to help find suitable alternative premises for these occupiers.

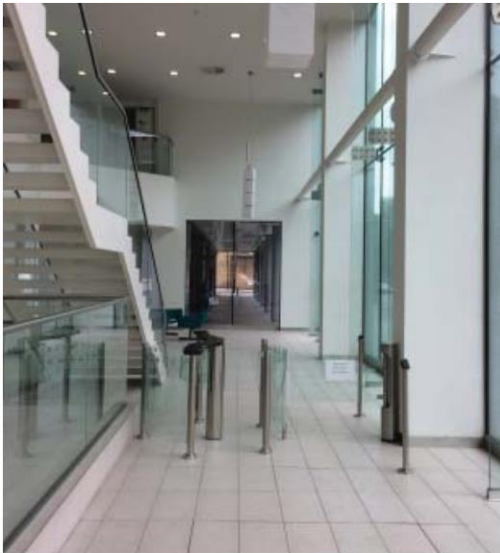


Figure 2 (left): Double height reception area to office space

- 7.5 Healthcare use – The South Camden Centre for Health occupies part of the ground floor of the building and has ancillary use of the loading bay and basement. Its main access is from Drummond Street (see Figure 3 below). The facility occupies 1,725m² (GIA) of floorspace and provides a range of services including physiotherapy, memory service, dermatology, bladder and bowel, tissue viability, heart failure, epilepsy and a GP walk in on Saturdays.



Figure 3 (left): Entrance to South Camden Centre for Health on Drummond Street

- 7.6 The healthcare use was established under planning permission 2009/4100/P granted 05/10/2009. The relevant permission allows a dual use as either a health centre (D1) or offices (B1a), which means the applicant has the flexibility to revert the use back to offices within ten years of the healthcare use being implemented.
- 7.7 Retail – The retail element of the site is located along the majority of the Hampstead Road frontage behind the colonnade, running from the intersection with William Road to where it meets the office entrance and reception area. Officers consider that the setback of the retail frontage within the colonnade detracts from its street presence (see Figure 4 below). The retail space is not located within a designated frontage of the Central London Area.

Figure 4 (right):
Colonnade with the retail shopfront behind it, on Hampstead Road



- 7.8 Sax Wind Brass currently occupy the 918m² of retail area on the ground floor, with access to storage in the basement. The occupier is made up of a saxophone specialist (Sax.co.uk), a brass specialist (Phil Parker) and a flute/clarinnet specialist (The Vibe by All Flutes Plus). The existing retail unit provides a range of instruments, a showroom and refreshments lounge, a brass and woodwind repair and service centre, demonstration rooms for play testing and practice/teaching rooms for hire. The applicant has stated that they are open to the opportunity for the future re-provision of this retailer at

Stephenson House. They are having ongoing discussions with the Managing Director and are assisting the retailer with their relocation following vacant possession of the building.

Mixed-use development

- 7.9 Policy H2 of the Local Plan requires a mixture of uses in all parts of the Borough, including a contribution to housing. For development located within the Central London Area, with more than 200m² (GIA) additional floorspace, policy H2 requires 50% of all additional floorspace to be self-contained housing. This requirement is subject to further considerations, including the character of the site and area, site constraints, compatibility of housing with other uses and planning objectives considered to be a priority for the site. The proposed development would provide an uplift of 4,920.8m² (GIA). Therefore, 2,460.4m² (GIA) of housing is required to meet the policy target. It is noted that superseded policy DP1 had a similar requirement, except that the trigger for the threshold and requirement of additional floorspace were based on GEA. The proposal has an uplift on 4,888.3 (GEA), requiring an on-site provision of 2,444.2m² (GEA) for housing.
- 7.10 The application site is considered to be acceptable in principle for residential accommodation subject to it being located within the right parts of the building as outlined in paragraphs 7.27-7.29 (below). In terms of GIA, the proposed development would provide 2,296.8m² of residential. This is 46.7% of the uplift and a shortfall of 163.6m². The proposal includes 2,533.3m² of residential by GEA, which is 51.8% of the uplift and a surplus of 89.1m².
- 7.11 Officers note that GIA is calculated by measuring the internal face of the perimeter walls while the GEA is measured externally (i.e. perimeter wall thickness and external projections are included). The GEA figures include the external wall area of the zigzagging residential balconies, which account for the large difference between GEA and GIA. The proposed scheme was designed to comply with the superseded DP1 policy (which is based on GEA) and the application was submitted before the Local Plan was adopted.
- 7.12 The shortfall against policy H2 is relatively minor. To compensate for the shortfall, the applicant has agreed to provide all of the affordable housing on-site as London Affordable Rent (the scheme previously included 2 x intermediate rent units). It is noted that London Affordable Rent is the Mayor's new product and the targets are comparable to Camden target social rents. The upgrading of the affordable offer is considered to mitigate the notional housing shortfall.
- 7.13 Overall, the proposal would deliver a mix of uses including new residential accommodation (C3), extended office space (B1a), the retention of flexible healthcare/office (D1/B1), retail space (A1) and a café (A3). While the provision of on-site housing falls below the requirements of policy H2, it is noted that it was devised to comply with superseded policy DP1 (and does comply), is a relatively minor shortfall and would be compensated through improvements to the affordable housing offer to provide 6 x social-affordable units at London Affordable Rent. Therefore, the proposed mix of uses is

considered acceptable on this occasion, subject to the on-site affordable housing being secured by S106.

Employment space

- 7.14 Policy G1 of the 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. The existing office space is out-dated, no longer fit for purpose and in need of refurbishment. The proposal seeks to enhance the quantum and quality of the employment space and to create Grade 'A' floorspace throughout. Overall, the proposal results in 16,709m² (GIA) of office space (an uplift of 5,919m² (GIA)). In addition, the proposal would deliver efficient, flexible office floorspace suitable for multiple businesses of varying sizes and uses, allowing for a greater diversity of enterprises to occupy this development within the Central London Area. Each floor is flexible to suit either a single tenant or multi-tenants.
- 7.15 As part of the proposal an atrium would run through the centre of the building's floorplate from basement to third floor with a glazed roof above. The atrium would improve the perception of brightness for office users as well as breakup the floorplates to provide visual interest. Three double height pocket gardens are proposed within the primary Hampstead Road elevation. Internally, the floorplate is designed so that most of the office floorspace looks into one of these gardens. The three pocket gardens would be interconnected and link to the 'L' shaped terraces to the rear of the building (see Figure 5 below, which shows the proposed amenity spaces for the employment use). These proposals, along within the significant upgrade to the internal and external fabric and facilities within the building, would greatly enhance the existing outdated office space.

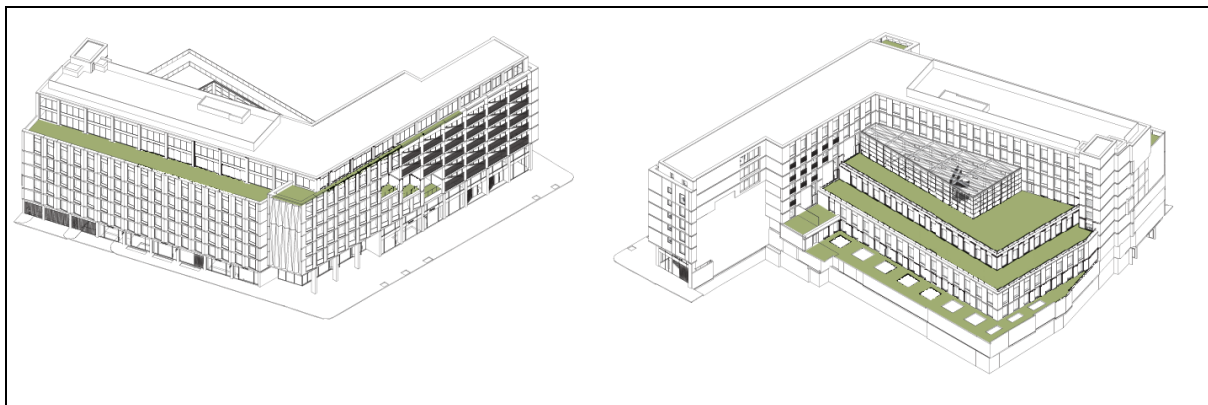


Figure 5 (above): The proposed office terraces are highlighted in green, with terraces facing Drummound Street and Hampstead Road (left image) and to the rear of the building (right image). The image to the right shows the atrium within the centre of the building.

- 7.16 A small and medium-enterprise (SME) space is proposed at ground floor and first floor level on the northern part of the site (near William Road), beneath the proposed residential units. It would be accessed via an entrance off Hampstead Road. The provision of SME space would allow smaller

businesses to locate in the Euston area, ensuring that Stephenson House contains a diversity of tenants, businesses and sectors. The floor area of the dedicated SME space is 199m² (GIA). Officers negotiated this SME space as part of the scheme to ensure an enhanced offer above and beyond policy requirements would be secured.

- 7.17 As set out in para 7.3 (above), the applicant is assisting the existing occupiers of the building with their relocation to alternative premises where required. They are open to the opportunity to re-provide them within the proposed development.
- 7.18 The significant increase in employment floorspace and the resulting quality and types of spaces provided is in accordance with policies E1 and E2, which set out the need to protect and enhance existing employment sites while meeting the needs of modern industry and encouraging a mix of employment facilities and types.

Healthcare use

- 7.19 The existing use, currently occupied by the NHS clinic - South Camden Health Care (SCHC), is subject to a flexible office (B1)/healthcare (D1) use following a change of use application granted on 5 October 2009 ref: 2009/4100/P. The space could be lawfully used for either office or healthcare without the need to apply for planning permission. The proposed development includes the retention of the flexible use, although the floorspace is being reduced from 1,725m² to 904m² (GIA) (a reduction of 821m²). Officers note that a large amount of the existing floorspace includes 519m² of ancillary servicing space in the basement (which is shared provision for the buildings).
- 7.20 An analysis of the existing healthcare use suggests that the current space is poorly designed and inefficient. Architectural drawings demonstrate that approximately 30% of the existing use is not fully utilised by SCHC and of the utilised space a further 30% is dedicated to circulation. Officers note from visiting the site that the space is inefficient with oversized corridors and many of the rooms do not have access to natural light.
- 7.21 The proposed flexible office/healthcare use would provide a higher quality environment that has been specifically designed to provide more efficient space. It would allow the existing occupier (the SCHC) or an alternative healthcare provider to be adequately facilitated. The proposed space has an active street frontage and further light would be gained from the atrium, which is being extended to the lower ground floor, and from light wells on Drummond Street and within the floor plate.
- 7.22 The applicant has discussed the future of the SCHC with the Director of Corporate Services for Camden Clinical Commissioning Group (CCG). At this stage they have not expressed their interest in being re-provided within the development; however, the applicant is continuing discussions with them. If the SCHC desire to be re-provided in the development, the applicant is committed to working with them. In addition, the applicant's property

consultant is discussing the re-location of the SCHC to an available fitted out medical use at 44 Wicklow Street.

- 7.23 Given the flexible nature of the existing healthcare use, there is no policy protection to justify its retention. Notwithstanding this, the proposed development would re-provide a flexible healthcare use of higher quality. While there would be a reduction in floor area, Officers consider this acceptable given a large amount of the existing use is attributed as ancillary basement space. Furthermore, the efficiency, provision of light and condition of the facility would be significantly improved. The applicant's willingness to help re-locate and to offer new space to the existing healthcare use goes beyond their duty, in terms of planning requirements, and is welcomed. The proposal is in accordance with policies C1 and C2, as it is supporting the provision of an improved health facility.

Retail/café space

- 7.24 Retail and restaurant/café space is proposed on the lower ground and ground floors of Hampstead Road and Drummond Street. Therefore, the retail provision of the site would be protected and enhanced in line with policies TC1 and TC2.
- 7.25 On Hampstead Road the retail units would have active frontages with shopfronts that open onto the street (rather than into the existing colonnade). This would enhance the perception of active frontages along Hampstead Road for pedestrians and improve light into the retail units. The retail arcade would be extended down Drummond Street, enhancing activity along this part of the street which is currently dull and inactive. Once Crossrail is open at Euston, Drummond Street will be an important route between the station and Regent's Park (as stated in the Euston Area Plan). The proposed development would therefore enhance this part of the route.
- 7.26 The proposed restaurant/café use would complement the existing retail facilities. It is considered that it would not have a detrimental impact on the vitality of the area or lead to an over concentration of food and drink uses. There are limited restaurant/café uses surrounding the site. Overall, the provision of the use would contribute to the Euston Area Plan's vision of rejuvenating the area '*as both a local hub of activity and a gateway to London*'.

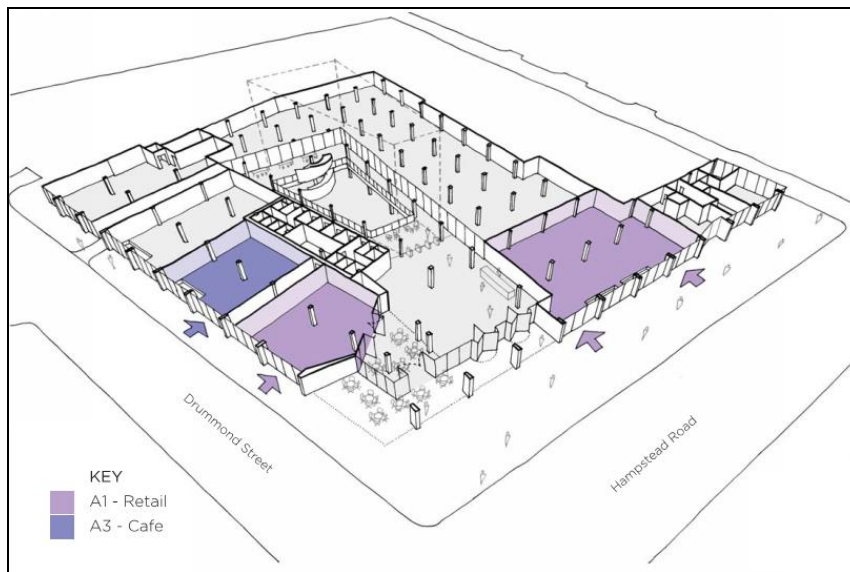


Figure 6 (left):
Proposed ground
floor retail (purple)
and café (blue)
uses

Proposed residential use

- 7.27 The application proposes 17 self-contained residential flats and an additional 2,296.8m² (GIA) of residential floorspace. The provision of additional residential floorspace within the Borough is strongly supported by policy H1, which highlights the need to maximise the supply of housing. It is also a requirement of the Local Plan to introduce housing, as per policy H2 (see paras 7.9-7.10, above), due to the proposal including a significant uplift of floorspace within the Central London Area.
- 7.28 The application site predominantly faces Hampstead Road, which is a heavily trafficked street and a TfL Red Route. The proposed residential development is located in the north-eastern corner of the site, with its primary frontage onto the noisy and polluted Hampstead Road. NEQ (Regents Place) is located to the south of the site. Its imposing towers, of 26, 16 and 8 storeys, cast shadows on the northern side of Drummond Street and beyond. As shown in Figure 7 (below), the southern area of the application site is partially shaded all year round whilst the northern part (where the residential units are proposed) are only shaded in December. The residential element has therefore been located in this part of the site as it would benefit from the most amount of natural light.
- 7.29 Further to the above, the residential flats are located on the second floor and above and are either dual aspect (with a secondary elevation on the quieter William Road or to the rear) or duplex units. Providing the residential use in this part of the building also allows the accommodation to benefit from a shallower plan form, a southeast facing aspect, external amenity space and it ensures the proposal would not introduce significant overlooking/loss of privacy concerns with surrounding residential units. The principle of residential development on this part of the site is therefore considered acceptable, subject to further considerations within section 8 of this report (below).



Figure 7 (above): The above image demonstrates how the application site is overshadowed by the tall development to the south (Regents Place), with the least shaded area in the north eastern corner of the site (shown in yellow, near the junction of William Road and Hampstead Road).

Housing density

- 7.30 In order to make the most efficient use of land and meet the objectives of policy H1, higher density development is encouraged in appropriately accessible locations and there is an expectation that densities will be towards the higher end of the density ranges set out in the London Plan. The emphasis on higher density development should be balanced with other considerations such as neighbouring amenity and securing the height, scale and massing appropriate to an area in terms of good design.
- 7.31 London Plan policy 3.4 sets out the considerations for determining appropriate density levels for sites. Using Table 3.2 (density matrix) of the London Plan the local built environment characteristics are identified as 'central' and the site has a PTAL rating of 6b (best). The proposed development would provide 17 units, with the number of habitable rooms 60, across a site footprint of 0.409ha (approx. 4,090m²). This equates to a density of 42 units/ha and 147 habitable rooms/ha which falls slightly below the range of the density matrix within the London Plan for 'central' sites (45-185 units/ha and 200-700 habitable rooms/ha). While the density is slightly lower than the range within

Table 3.2 of the London Plan, it is considered that the figures are misleading given that this development involves a relatively small uplift of a large building that is exclusively made up of commercial uses (i.e. the calculation does not take into account that this is a mixed use site).

Conclusion

- 7.32 Overall, the proposed development is considered to have an appropriate mixture and density of uses for the site that would enhance the existing spaces while benefitting a number of the Council's policy objectives by contributing towards a successful economy, providing active retail uses and introducing housing.

8. Housing Mix, Unit Size and Quality of Accommodation

Housing mix

- 8.1 The proposed development would comprise 17 residential units, including 11 market units and 6 affordable units. Policy H7 seeks to provide a range of unit sizes to meet demand across the Borough. For market units table 1 of this policy considers 1-beds/studios to have a lower priority, 2 bedroom units to be of high priority, 3-bed units high priority and 4-beds (or more) a lower priority. Social-affordable rented units have a lower priority for 1-beds/studios, high priority for 2 and 3 bedroom units and a medium priority for 4 bedroom (or more). For intermediate affordable there is a high priority for 1-beds, a medium priority for 2-beds and a lower priority for 3-bed and 4-bed (or more).

Housing Mix Table for Proposal					
	1 bed	2 bed	3 bed	4+ bed	Total
Market units	1	6	4	0	11
Social-affordable rent	0	3	3	0	4
Total	1	9	7	0	17

- 8.2 The proposed market units would be predominantly 2 bed in line with policy requirements. A high proportion of 3 bedroom units are provided (medium priority) and only a single 1-bed unit (lower priority). No 4-bed (or more) sized units (lower priority) are provided, which is deemed acceptable given the central location of the site making it less appropriate for larger family sized homes. The social rented units are 2 and 3-bed (both high priority) in line with policy H7. On this basis, the unit mix is considered to be acceptable.

Unit size

- 8.3 The Department of Communities and Local Government (DCLG) released nationally prescribed space standards in March 2015, which are now incorporated in the Local Plan. The minimum gross internal floor areas are set by the number of bedrooms and bed spaces/occupiers in each dwelling. The development consists of 1 bed 2 person; 2 bed 3 person; 2 bed 4 person; 3 bed 5 person and 3 bed 6 person units which require a minimum of 50m², 61m²/70m² (1 storey/2 storey dwellings), 70m², 86m²/93m² (1 storey/2 storey dwellings) and 95m² respectively. All of the units comply with the national standards and the majority of units comfortably exceed them.

Quality of accommodation

- 8.4 As stated above, the residential accommodation is located within the north-eastern corner of the site from the second floor to the seventh floor. Its primary frontage is towards Hampstead Road with secondary frontages available for some of the units towards the rear of the site and/or William Road. This part of the site is considered acceptable for residential as it receives the most amount of light (see Figure 7 above) and allows the majority of the units to be dual aspect with a shallower plan form. It is also the part of the site that is the least overlooked and would introduce the least amount of overlooking concerns. The quality of the units is assessed in more detail below.
- 8.5 Layout, ventilation, ceiling heights – The general layout of the units is acceptable providing functional and practical spaces. The ceiling heights of the residential spaces comply with the 2.3m minimum standards within CPG2 (Housing). No parts of the internal spaces are below 2.3m with the majority of the habitable rooms benefiting from a height of at least 2.5m. All of the units have openable doors and windows (i.e. passive/natural ventilation) in addition to mechanical ventilation.
- 8.6 Daylight, sunlight, outlook and aspect – As stated above the residential units are located within the part of the site that receives the most amount of light. The principal elevations and main balconies have been angled to be southeast facing. An 'Internal Daylight Report' has been submitted in support of the proposal. The analysis shows that the vast majority of the rooms (53 out of 60) meet the relevant thresholds for light (i.e. average daylight factor as per BRE guidance). Six of the seven rooms that do not meet the standard include living/kitchen/dining rooms with galley style kitchens located at the rear of the room. When the main living area is calculated these rooms exceed the guidance or have a very minor shortfall (i.e. 0.1% or less). Most of the rooms that fail are also served by balconies. The balconies restrict light; however, they provide private amenity space so are on balance a benefit to those units.
- 8.7 Amenity space – Private external amenity space in the form of balconies is provided for all of the units and they all exceed the minimum requirements of the London Plan. Each unit benefits from a balcony on the Hampstead Road elevation, which is southeast facing to benefit from natural light and outlook down Hampstead Road (looking away from the built form on the opposite side of the road). Four of the units include a secondary balcony to the rear of the site.
- 8.8 Access and inclusive design – New build residential developments must comply with the access standards in Part M of the Building Regulations. This includes parts 1 (Visitable dwellings), 2 (Accessible and adaptable dwellings) and M4 (3) wheelchair user dwellings. The Council expects all new build housing development to go above the minimum mandatory Building Regulations with a requirement to meet Building Regulations part M4 (2); and in this case for 10% of the units to meet part M4 (3) (wheelchair housing).

This is applied to new build housing providing 10 or more units as required by policy H6 and London Plan policy 3.8 (Housing Choice).

- 8.9 All of the residential accommodation has been designed in accordance with the above and to comply with the Lifetime Homes Standards (which are no longer mandatory). The proposed development includes two wheelchair accessible dwellings. Each dwelling has been designed in accordance with Camden Wheelchair Design Brief standards and the Building Regulations Approved Document Part M. These details would be secured via planning conditions.
- 8.10 Noise for prospective occupiers – A ‘Noise Impact Assessment’ has been submitted by an acoustic engineer, 24 Acoustics Ltd, to assess proposed internal noise levels for prospective occupiers. The report recommends glazing configurations, sound insulation between walls and floors and acoustically rated glazing and ventilators to habitable rooms. With the recommended measures given, noise within habitable rooms would comply with acceptable internal levels. The Council’s Environment Health Officers support the proposal subject to the following details being secured via planning conditions:
- Details of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings
 - Details of the sound insulation of the floor/ceiling/walls separating the commercial part(s) of the premises from noise sensitive premises. The details would need to demonstrate that the sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises

9. Affordable Housing

- 9.1 Policy H4 of the Local Plan seeks to maximise the supply of affordable housing, in line with aiming to exceed the Borough wide strategic target of 5,300 affordable homes from 2016/17-2030/2031. The Camden Strategic Housing Market Assessment estimates a need for around 10,000 additional affordable homes from 2016-2031. Policy H4 has a sliding scale target that requires an additional 2% affordable housing per capacity for each additional home. Capacity for one additional home is defined within the Local Plan as the creation of 100m² of additional residential floorspace (GIA). In assessing capacity, additional residential floorspace is rounded to the nearest 100m² (GIA). The affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings.
- 9.2 As stated in para 7.9 (above) the target residential quantum required in accordance with policy H2 is 2,460.4m², which equates to a capacity for 25 units and an on-site affordable housing target of 50% (i.e. 2% per unit means

25 x 2 = 50). The affordable target based on the scheme providing a policy compliant amount of on-site housing and affordable housing is shown in the table below:

Table 1: On-site Affordable Housing Target	
	Floorspace m² (GIA)
Total uplift	4,920.8
Overall housing target	4,920.8 x 50% = 2,460.4
'Capacity' of housing target	2,460/100 = Capacity for 25 homes
Affordable housing percentage target	2% x 25 50%

- 9.3 The proposal includes 11 units for private sale and 6 would be London Affordable Rent (LAR) - which is a form of social-affordable rent. This leads to an affordable provision of 35.3% based on proportion of units. The affordable component has a GIA of 808.6m² (including communal areas), which equates to 35.2% of the residential floorspace provided on-site. This results in a shortfall of 14.8% against the target of 50% of on-site affordable.
- 9.4 The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) was published in August 2017. It sets out the Mayor's long-term aim for half of all new homes to be affordable and aims to increase the amount of affordable housing delivered through the planning system; embed the requirement for affordable housing into land values and make the viability process more consistent and transparent. The guidance includes a fast track route for applications that meet or exceed 35% affordable housing provision on-site. It is noted that applications decided under the fast track process do not require viability information to be submitted. The application pre-dates this guidance and was submitted with viability justification for not meeting the on-site affordable housing target, meaning that the 35% fast track route is not applicable.
- 9.5 The affordable housing provided is in the form of 6 social-affordable rented units set at LAR benchmarks. LAR is defined as low cost rent and the benchmarks are set within the Homes for Londoners: Affordable Homes Programme 2016-21. The initial submission included a provision of 4 x social-affordable rent units and 2 x intermediate rent units, which is more in line with the tenure guideline mix of policy H4 (60% social-affordable and 40% intermediate housing). Officers negotiated the switching of intermediate units into social-affordable during the application to improve the quality of the offer. While this is not strictly in accordance with the guideline mix of affordable housing types, it represents a better affordable product overall as more units are set at low cost rent levels, it would prevent the mix of affordable tenures and allow a Registered Provider (RP) to more effectively manage the units. The units provided include 3 x 3bed 5 person and 3 x 2bed 3 person (with 1 x wheelchair accessible unit). 2 and 3 bedroom units have a high priority in the

social-affordable tenure as per table 1 of policy H7. Units of these sizes are not preferable in the intermediate tenure as 1 bedroom units are of high priority. Furthermore, 2bed 4 person units are preferable to 2bed 3 person units as they can be occupied by sharers.

Viability

- 9.6 The application is supported by a 'Financial Viability Assessment' prepared by Gerald Eve. The report examines the development economics of the proposal and came to the conclusion that the proposed inclusion of 35% affordable housing remains the maximum reasonable that can be offered by the scheme and any additional contributions will add additional risk to the delivery. It concluded that the scheme currently falls short of a 17.14% profit target on gross development value (GDV), showing that only 12.08% profit on GDV can be achieved. Gerald Eve arrived at a benchmark land value, based on an existing use value of the property with a 9% Landowner's premium, of £85million.
- 9.7 BPS was instructed to undertake an independent review of the viability report by Gerald Eve. They assessed the cost and value inputs within the financial appraisal in order to determine whether the scheme can viably make any additional affordable housing contributions. A redacted copy of their addendum to the viability review is included as Appendix 1. Furthermore, BPS instructed Crossland Otter Hunt to examine the commercial values assigned to the existing and refurbished space.
- 9.8 Following discussions between Gerald Eve and BPS, an agreed benchmark land value of £87,700,000 was reached following amendments to some of the rents and yields. Officers note that a significant amount of assumptions were agreed between the viability consultants, apart from commercial rents and yields. These remaining points reflected differences of opinion relating to what overall rent could be achieved on the office element of the proposed scheme and what the reasonable yield for the office element would be.
- 9.9 Gerald Eve consider that an overall rent of £63.87 per square foot is appropriate whilst Crossland Otter Hunt maintain that the overall rent should be £70 per square foot. Furthermore, Gerald Eve consider the overall yield to be 4.5% compared to Crossland's assumed yield of 4.25%. Based on these assumptions, Gerald Eve arrived at a valuation of £1,309 per square foot to Crossland's £1,526 per square foot.
- 9.10 BPS have made it clear that the above are very small margins of variation and that a higher level of accuracy is difficult to attain at this stage. Therefore, BPS and Gerald Eve have reached a compromise position or mid-ground to progress the matter. BPS consider a £67.50 per square foot rental value and a mid-point on the yield at 4.375% to be appropriate in these circumstances. This equates to a capital value of £1,426 per square foot, which indicates that a viable scheme could be achieved at the agreed benchmark land value based on 35% affordable housing. Therefore, even at the compromised position the current scheme cannot support any additional affordable housing contribution at this time.

- 9.11 BPS recommended that given the potentially higher yields that could be gained from the commercial element of the development, that a post-construction review of viability should take place. A post-construction review would use actual costs and values to give a clearer idea of the scheme's ability to make further affordable housing contributions. Any further surplus generated would be paid to the Council. Gerald Eve recognise that if the achieved capital value for the office element exceeds the compromise position reached in para 9.10, then the scheme could potentially be able to afford an additional payment up to the policy target amount.
- 9.12 In addition to reaching the compromise position, the applicant agreed (following negotiations with officers) to convert the proposed 2 x intermediate rent units into LAR to better help housing needs by providing a lower cost (to tenants) offer. The applicant also confirmed to the Council in writing that it is willing to agree a head of term in the legal agreement to adopt a review mechanism to determine any additional contributions by way of a payment in lieu.

Review mechanism

- 9.13 As stated in paragraphs 3.65 (policy H2) and 3.124 (policy H4) of the Local Plan, the Council expects reappraisal of viability when a development is substantially completed. This is to capture an accurate estimate of the value of the development using current values and costs at the time of implementing the scheme rather than forecasted ones. A subsequent viability review determines the extent of any top-up payments that can be secured towards the shortfall in provision against the Council's affordable housing target.
- 9.14 Given that the proposal fails to meet policy required levels of affordable housing, planning permission must be subject to a review mechanism provided within the S106 agreement. This would protect the applicant's ability to clear the scheme deficit before any deferred contributions become payable and would potentially allow the Council to secure money towards affordable housing in the event of circumstances in terms of viability changing.
- 9.15 Any deferred contribution, following a future viability review, would be subject to a capped level in line with the policy compliant amount of affordable housing required on-site as part of the development. Payments in lieu are calculated on the basis of the shortfall of on-site affordable housing (in GEA) at a cost of £2,650 per m²; as stated in CPG8 Figure 1 (para 6.11). A policy compliant payment in lieu would be £956,383, as calculated in Table 2 below:

Table 2: Payment in Lieu Calculation	
	Floorspace m² (GEA)
Total uplift	4,888.3
Overall housing target	4,888.3 x 50% = 2,444.2
Overall housing provision	2,533.3 = 51.8%

Affordable housing floorspace target	2,533 x 50% = 1,266.5
Affordable housing provided on-site	905.6
Affordable housing shortfall	1,266 - 905.6 = 360.9
Affordable housing payment in lieu	360.9 x £2,650 = £956,385

Conclusion

- 9.16 The proposed development is considered to maximise the supply of affordable on-site. Following an independent viability review by BPS, the affordable offer has been improved to providing 6 x LAR units instead of the originally proposed 4 x LAR and 2 x intermediate rent units. BPS conclude that the scheme cannot viably provide any further quantum of affordable housing and a future viability review has been secured to ensure that any surplus gained from the developer is shared with the Council through a financial contribution.

10. Design and Character and Appearance

Context

- 10.1 The existing building has a narrow 'L' shaped plan running along Hampstead Road and returning down Drummond Street. It is seven storeys plus plant at its highest point. The Hampstead Road section of the building rises directly from the back of pavement, while the Drummond street section forms a two storey plinth, with the remaining floors setback behind. The neighbouring buildings fronting Drummond Street (6 or 7 storeys high) take the more conventional approach of rising their full height from the back of pavement.
- 10.2 The application site is not within a designated conservation area (CA) or within the setting of a CA or any listed buildings. There are locally listed buildings on William Road, including one adjacent to the proposal. These are well-made and robust pieces of townscape from the late 19th Century and early 20th Century. Their significance and setting is not considered to be harmed by the proposal in accordance with section 135 of the NPPF, which requires non-designated heritage assets to be taken into account in determining an application.
- 10.3 The existing building was built in the late 1950s. It was re-clad in the 1980s with polyester coated metal cladding and darkened glass. The resulting building is very flat and uniform. The polyester has suffered sun damage and the façade is generally tired. Until 2009 the building had a full-length colonnade along Hampstead Road. The southern half was infilled as an office reception 8 years ago. Along Hampstead Road, the building line south of Drummond Street aligns to the rear of the colonnade; while the building line north of William Road aligns to the front of the colonnade. The resulting 2009 infilling therefore leaves a remnant colonnade which is blinkered by projecting building lines to the north and south. Officers consider the building to be of little merit architecturally and have no objection to its substantial redevelopment.

Height, scale and massing

- 10.4 The proposed development involves the stripping back of the building to its structural frame. The building line would be brought forward on Drummond Street to align with the podium and to reflect the historic form of the building and the neighbouring situation. It is proposed to extend the building to the rear up to the third floor. The wings of the building would rise by an additional setback storey on Hampstead Road and two additional setback storeys on Drummond Street. The additional height has limited presence and is considered acceptable in the context of more recent developments at the neighbouring Regent's Place (up to 26 storeys) and the surrounding existing buildings which are of comparable height.

Layout

- 10.5 The proposal introduces residential units at the northern end of the Hampstead Road section of the building. The party wall between the office and residential steps southwards with each storey, so that the residential floorplate increases in width as one travels up the building. This has the benefit of placing a greater number of the units higher above Hampstead Road than would occur if the building were stacked more conventionally. At ground floor the colonnade infill has been rearranged, with it being introduced to the south (at the corner with Drummond Street) and infilled to the north. This results in a much more natural progression of building lines as one moves along Hampstead Road, but also releases space on the junction between Hampstead Road and Drummond Street. The office entrance is located behind the colonnade, with retail making up the middle section of Hampstead Road frontage and residential entrances at the northern end. A small office entrance is proposed on William Road with a small office floor (for SMEs) above. Along Drummond Street, active retail uses have been introduced. The service entrance remains but has been reduced in width significantly. The incongruous roller shutter openings (including 3 vehicle entrances) have been replaced with ornate gates that would reference the wider development. Final details of the gates would be reserved for planning condition.

Detailed design

- 10.6 In contrast to the uniform cladding of the existing building, the proposal treats the two street frontages as separate entities reflecting the hierarchy of the streets. The proposal also addresses the flatness of the existing building by introducing depth, solid elements and rhythm. The depth is achieved by introducing a façade that zigzags in plan, with windows on the zigs, and solid facade on the zags.
- 10.7 On Hampstead Road the solid elements are formed of reconstituted stone with a limestone tone. On Drummond Street, the solid elements are brick. Metal spandrel panels are placed at the bottom of each window. Along Hampstead Road the reconstitution stone section has a two-storey expression at ground floor reflecting the scale of the road. On Drummond Street the brick section drops to a one-storey expression at ground, and the parapet height drops by one storey. Both sections of the building have the final horizontal

member raised so that it creates a floating cornice. This allows sunlight through whilst masking the setback storeys and introducing a termination to the façade.

- 10.8 The gable of the Hampstead Road section has a three-dimensional glass façade formed of an elongated diaper pattern, which gives interest to this prominent corner. Details of this elaborate feature would be secured by planning condition.
- 10.9 In plan, the residential units have been twisted by 45 degrees. This results in a more exaggerated and deep version of the zigzag façade of the office element. The balcony spaces would be interesting features, which would angle the units towards a more southerly aspect. This south eastern aspect allows for longer views as the units look down the street rather than across). As the residential and office floors meet at a diagonal rather than vertical party wall line, an interesting compositional pattern has been introduced to the façade. This has been taken further by the introduction of double height atria at the point the two uses meet. These atria (referred to as 'pocket gardens') are recessed from the Hampstead Road elevation behind balconies. They also reflect the height of the external terraces on the rear extension, which steps back with each storey height. The market and affordable entrances sit side by side and are the same size and design. The lobbies are wide and short, and the façade is angled back to create a covered porch area.

Strategic viewing corridor

- 10.10 Part of the site falls within Mayor's Landmark Viewing Corridor 2B.1 (from Parliament Hill to Palace of Westminster) and the Wider Consultation Area of View 5A.2 (from Greenwich Park towards St. Paul's Cathedral). The Viewing Corridor 2B.1 passes over the eastern site boundary on the corner of William Road and Hampstead Road and limits the height of the development in this area to approximately 60.5m AOD or 34.2m above ground level (as measured from the pavement). The Wider Consultation Area of View 5A.2 passes over the north-eastern corner of the site approximately 52.86m AOD or 26.56m above ground level (as measured from the pavement).
- 10.11 The top of the existing building is 53.7m AOD, approximately 27.35m above ground level. The existing building exceeds the threshold plane of the Wider Consultation Area of View 5A.2 by approximately 840mm; however, it is obscured by the recently completed NEQ development at Regent's Place.
- 10.12 The proposed building mass and parapet height would not exceed the existing maximum building height; however, the roof plant enclosure, stair access and lift overrun at the south-west end of the 7th floor roof would be higher than the parapet line. These elements have been carefully positioned away from the Wider Consultation Area of View 5A.2, as much as possible, to minimise the impact on the view. The corner of the proposed plant enclosure would extend approximately 1.8m above the threshold plane; however, this would only occur in one location. Figure 8 (below) shows the proposed breach of the plant enclosure.

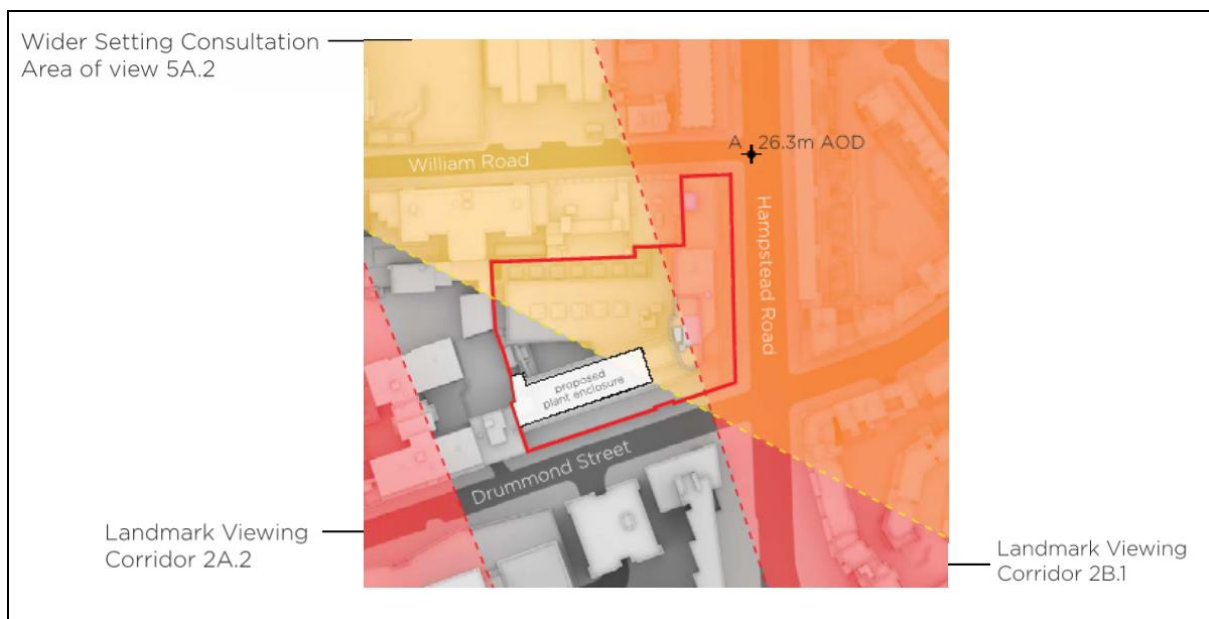


Figure 8 (above): Top view showing the location of the proposed plant enclosure in relation to the viewing corridors.

- 10.13 Given that only a small section of the proposed plant would be visible in the views from Greenwich Park towards St. Paul's Cathedral, the minor intrusion is considered acceptable. Furthermore, the Greater London Authority and Historic England have both been formally consulted on the application and have raised no objections.

Summary

- 10.14 Overall, the scheme is well-considered and of a high quality design. The additional mass is not considered to have any detrimental impacts on the townscape or character and appearance of the area generally, while the additional mass resulting in the realignment of the Drummond Street façade to the historical location is a beneficial move. The manipulation of the form into two building frontages; the increased depth and rhythm in the façade; the uses of high quality traditional London materials; the changes to the colonnade location and the design of ground floor frontages are all considered to be significant enhancements over the existing.

11. Neighbouring Amenity

- 11.1 Local Plan policies A1 and A4, and CPG6 (Amenity), seek to ensure that the existing residential amenities of neighbouring properties are protected, particularly with regard to visual privacy, outlook, daylight and sunlight, noise and air quality. Policy A1 states that the Council will only grant permission for development that does not cause harm to amenity. The surrounding properties are labelled in Figure 9 (below).



Figure 9 (above): Surrounding properties in context with the proposed scheme

11.2 The application site is immediately surrounded by Hampstead Road to the east, Drummond Street to the south and William Road to the north. Properties on the eastern side of Stanhope Street face towards the rear of the site and a housing block on George Mews has an elevation opposite the proposal on the other side of Hampstead Road. The surrounding residential properties, which have been assessed as part of the proposal, are summarised below:

- **3-18 Prince Regent Mews, 89-101 Hampstead Road:** The building has a five storey elevation (including loft) on the opposite side of William Road, which includes residential flats
- **2 William Road:** Ground floor and basement dwelling lying opposite the proposal
- **Hampstead House, William Road:** Five storey (including basement) block of residential flats on the northern side of William Road
- **17-33 William Road:** A seven storey building on the southern side of William Road with habitable rooms and balconies facing the rear of the application site

- **12-19, 20-27 and 28-35 George Mews:** The western aspect of these residential properties look towards the application site from the opposite side of Hampstead Road. The elevation has four storeys of accommodation and includes balconies at the lowest level
- **68-74 Hampstead Road:** Habitable windows look towards the application site from the eastern side of Hampstead Road
- **66 Hampstead Road:** The upper floors of the building (1-3) serve residential accommodation with windows on the front elevation
- **62-64 Hampstead Road:** The upper floors of the building (1-4) serve residential accommodation with windows on the front elevation
- **161-163 Drummond Street:** The upper floors (1-4) serve residential units facing Drummond Street and are located to the southeast of the proposal
- **50-58 Hampstead Road:** The building is located to the southeast of the Hampstead Road/Drummond Street junction. Its upper floors (1-4) serve residential flats with the rear (western) elevation facing Hampstead Road
- **NEQ, 175 Drummond Street:** This property is located to the south of the site, on the opposite side of Drummond Street, and has residential accommodation within the 8 storey (affordable units) and 26 storey blocks above a two storey podium element. Balconies and habitable windows face the proposal on the north facing elevation
- **164-166 Drummond Street:** The seven storey building is attached to the host property to the west. It contains residential units with habitable windows on the front (north facing) and rear (south facing) elevations
- **Schafer House, 168-182 Drummond Street:** Student accommodation for UCL. The seven storey rear projection to the building has side (east facing) windows that look towards the application site
- **48-60 Stanhope Street:** The rear elevations of these residential properties face towards the rear of the application site. These buildings have a minimum setback of 52.6m from the proposal and have buildings and a car park between them.

Daylight/sunlight

- 11.3 A Daylight and Sunlight report by Point 2 Surveyors dated June 2017 has been submitted with the application. It provides an assessment of the potential impact of the development on sunlight, daylight and overshadowing to neighbouring residential properties based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide (2011)'. The assessment is based upon a measured survey and is supplemented by a site inspection, photographs and further research. Floor plans of surrounding properties were obtained, where possible, to improve the accuracy of the analysis and were incorporated into a 3D digital context model.
- 11.4 The report makes use of four standards in the assessment of existing versus proposed daylight and sunlight levels:
- Vertical Sky Component (VSC) - A measure of the amount of sky visible at the centre of a window. *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value*
 - No Sky Line (NSL) - The area at desk level inside a room that will have a direct view of the sky. *The NSL figure can be reduced by up to 20% before the daylight loss is noticeable*
 - Average Daylight Factor (ADF) - A measure of the ratio of the luminance in a room to the external unobstructed sky. It is mostly used to assess daylight in new dwellings but can be an additional test to VSC when the layout of the existing units are known
 - Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period
- 11.5 The daylight and sunlight report assessed all of the surrounding residential properties and the student accommodation at Shafer House, which is not considered to be permanent residential accommodation (as its occupiers are transient). The properties assessed are listed in para 11.2 (above). Other surrounding properties are either significantly setback from the proposal (with no directly affected habitable windows) or are commercial in use and therefore do not have an expectation for daylight/sunlight amenity.

The overall results of the daylight/sunlight analysis are below. It is noted that these are the base results which include testing to the NEQ building with the balconies in place (an alternative test has been conducted with the balconies removed).

- VSC – of the 638 windows tested 89.7% (572) meet BRE guidance. Of the 66 windows that do not meet BRE guidance, 29 (44%) of these are minor transgressions between 20-29%.
- NSL – of the 410 windows tested 86.4% (354) meet BRE guidance. Of the 56 windows that do not meet BRE guidance, 20 (36%) of these are minor transgressions between 20-29%.
- APSH – of the 392 habitable windows deemed relevant for sunlight analysis, 99.7% (391) meet BRE guidance.

- 11.6 Where reductions beyond the typical BRE recommendations occur, the majority exceed by a minor margin (i.e. reductions ranging from 20% to 30%). In the instances where slightly larger effects occur, these are predominantly due to limitations from design features in the affected properties.
- 11.7 Officers acknowledge that the proposed development is within a dense urban environment, within Zone 1 of Central London, and the design and nature of some of the existing neighbouring buildings is such that there are pre-existing shortfalls in daylighting relative to the normal BRE Standards. For example, some of the windows of the surrounding buildings are located underneath projecting balconies and as such they already experience relatively low levels of lighting. When this is the case any small absolute reduction can result in non-compliance. Given the nature of the site and surrounding buildings, it would be difficult to develop the property without resulting in some transgressions in BRE guidance. The London Plan March 2016 Supplementary Planning Guidance – Housing states, in para. 1.3.45, that *‘an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development’*. This does not mean that BRE guidelines should be disregarded for assessment purposes, rather that the decision maker should apply the results flexibly and consider the circumstances of the site and the affected properties. An analysis of the most affected properties is included below.
- 11.8 17-33 William Road – This residential property is located to the northwest of the site and has rear windows overlooking it. All of the windows meet the BRE recommendations in respect of VSC. Five rooms record a relative change in NSL between 20%-26%, which is slightly beyond the typical BRE recommendations (20%). A number of the windows/rooms within the building area affected by projecting balconies above and/or a recessed elevation behind a side return or an inset balcony (see Figure 10 below). These features limit the spread of daylight internally. Despite the minor transgressions in NSL, it is not likely that the rooms would be noticeably affected as demonstrated by the VSC analysis. All of the windows relevant for sunlight assessment meet the BRE guidance (APSH).



Figure 10 (above): Windows and balconies at 17-33 William Road (building in the background) facing the development. Many of the windows sit behind projecting/inset balconies.

- 11.9 68 – 74 Hampstead Road – These properties are located to the east of the site (on the opposite side of the road) with residential accommodation at floors 1-3. All of the windows meet the BRE requirements for VSC. Overall, two rooms within this collection of residential units exceed the 20% relative change recommendation in NSL. This includes a first floor room within 72-74, which is set behind a side return at 68-70 and below an overhang of the unit above. These circumstances distort the NSL analysis. The other affected room is on the ground floor at 68-70. The reduction in NSL is largely due to an overhang above the window and the depth of the room and it is noted that this room is served by two windows. The affected rooms are both served by windows that are fully compliant with VSC and are within dual aspect units (with an elevation facing George Mews). It is therefore not considered that light would be unduly lost for occupiers. All of the windows relevant for sunlight assessment meet the BRE guidance.
- 11.10 66 Hampstead Road – The upper floor residential units are located to the east and have west facing windows overlooking the site. All of these windows meet the VSC recommendations within BRE. The front rooms on the first, second and third floors record a relative change in terms of the NSL analysis. These rooms are relatively large (i.e. they have a deep plan form) and are single aspect. This provides the worst-case position for NSL analysis. Despite the transgressions, each room has two generous sash windows with a good level of VSC (the daylight potential on the face of the windows would not be noticeably affected). In addition, the units are dual aspect with rear facing rooms and all of the windows are acceptable in terms of the sunlight

assessment under BRE. Based on the above, the resulting light conditions are considered acceptable.

- 11.11 62-64 Hampstead Road – The building is located at the junction of Hampstead Road and Drummond Street and has west facing windows looking towards the site on floors 1-4. The windows assessed all met the BRE guidance in terms of VSC. Four rooms record reductions exceeding the BRE recommendations for NSL. These include the two first floor rooms, one of the second floor rooms and a third floor room. The reductions range from 22% to 28%, which is slightly over the BRE guidance of 20% (where changes are deemed to be unnoticeable). The reductions are primarily due to the deep rooms and the awkward layout of the building, which limit the spread of daylight internally. There are only two windows per floor on the upper levels of the wide Hampstead Road elevation and the Drummond Street frontage is a blank gable. Given that the reductions are only marginally beyond the typical 20% recommended by the BRE, and that the VSC analysis for the windows demonstrates that the amount of light reaching the face of the windows is acceptable, it is not considered that the resulting loss of daylight distribution within the affected rooms would be materially harmful to occupiers.
- 11.12 One of the windows on the first floor does not meet the BRE recommendations in respect of the APSH sunlight assessment. This window faces almost due west and records a relative change in annual APSH of 24% rather than the typical recommended 20% margin in the BRE. It would retain 19 APSH annually and 2 APSH in winter. Officers have researched the planning records and the use of the room affected is unclear; however, it is likely to serve a habitable room. The property includes a mixture of studios and two bedroom flats. If the affected unit is a studio flat, then the room will be served by two windows with one of them meeting APSH guidelines. However, if the unit is a two bedroom flat it is likely that the affected window serves a bedroom, which has the lowest requirement for sunlight for habitable rooms (according to BRE guidelines). Due to the above it is not considered that the proposal would result in material reduction in sunlight for those occupiers.
- 11.13 Furthermore, the affected windows in this building lie directly opposite the proposed infill to the corner of the site on Hampstead Road/Drummond Street. In townscape concerns there are no objections to infilling this part of the site and it would result in a building that better addresses the corner. Having such a break in massing, as the building currently does, is not a feature in the prevailing pattern of development. The resulting benefits from infilling this corner, in terms of design and townscape and the uplift of employment space, are compelling and outweigh any minor harm to the daylight and sunlight currently enjoyed at no. 62-64.
- 11.14 50-58 Hampstead Road – This property is located to the southeast and has residential units on the upper floors. The elevation facing towards Hampstead Road has external walkways (see Figure 11 below) providing access to the flats which overhang many of the windows. These walkways obstruct daylight and sunlight potential for the windows and rooms behind them. The flats have an oblique view of the site across the junction of Drummond Street and

Hampstead Road. The submitted daylight and sunlight report shows that all of the windows in this property would meet BRE guidelines in respect of the VSC daylight assessment. Two rooms would experience reductions in NSL beyond the typical 20% relative change recommended in the BRE. These rooms are on the second floor, recessed within the walkway at this level and underneath the third floor walkway that projects out further towards Hampstead Road. The glazing serving these rooms is therefore heavily recessed, and as a result the rooms have minimal existing daylight potential. Their existing VSC values are low; however, neither window experiences any change in VSC due to the proposed development. Officers therefore consider that due to the restricted daylight potential in these rooms, that the NSL analysis is distorted. The existing areas of the rooms receiving sky visibility are already very low (less than 15% of the room area) and as a result even a small change in absolute terms is represented as being beyond the typical 20% relative change margin in the guidelines. In addition, the VSC analysis shows that in reality any change is within typical parameters and therefore can be attributed to a technical anomaly.

- 11.15 All of the windows in this property meet the BRE recommendations in respect of the APSH sunlight analysis.



Figure 11 (above): Image of 50-58 Hampstead Road showing the external walkways which compromise many of the windows underneath and within them

- 11.16 NEQ, 175 Drummond Street – This property is located to the south of the site, on the opposite side of Drummond Street. It has residential accommodation directly opposite the site within the mezzanine level, the two storey podium element and the 8 storey (affordable units) and 26 storey (market units) blocks above. As shown in Figures 12 and 13 below, the tower blocks have projecting balconies on all levels. The balconies are considered to significantly obstruct the outlook of the windows and rooms that are below and behind them. They overhang the glazing beneath and materially impair the window's

daylight potential. In addition, partitions and screens further hinder the outlook from windows.



Figures 12 (above left) and 13 (above right): Elevation of NEQ on the opposite side of Drummond Street. This façade contains large projecting balconies

11.17 Figure 14 (below) provides a helpful demonstration of the limitations on daylight that results from projecting balconies. The images compare the existing outlook from two of the mezzanine (i.e. first floor) level windows. One of the windows is located beneath a balcony and the other is within an area of the façade that is unobstructed from above. The images show that the window underneath the balcony has an existing VSC value (i.e. without the proposed development in place) of 5.09. In comparison, the adjacent window that is not obstructed by a balcony has an existing VSC value of 21.74. This shows that in some cases the balconies reduce the daylight potential to the windows beneath them by a factor of four.

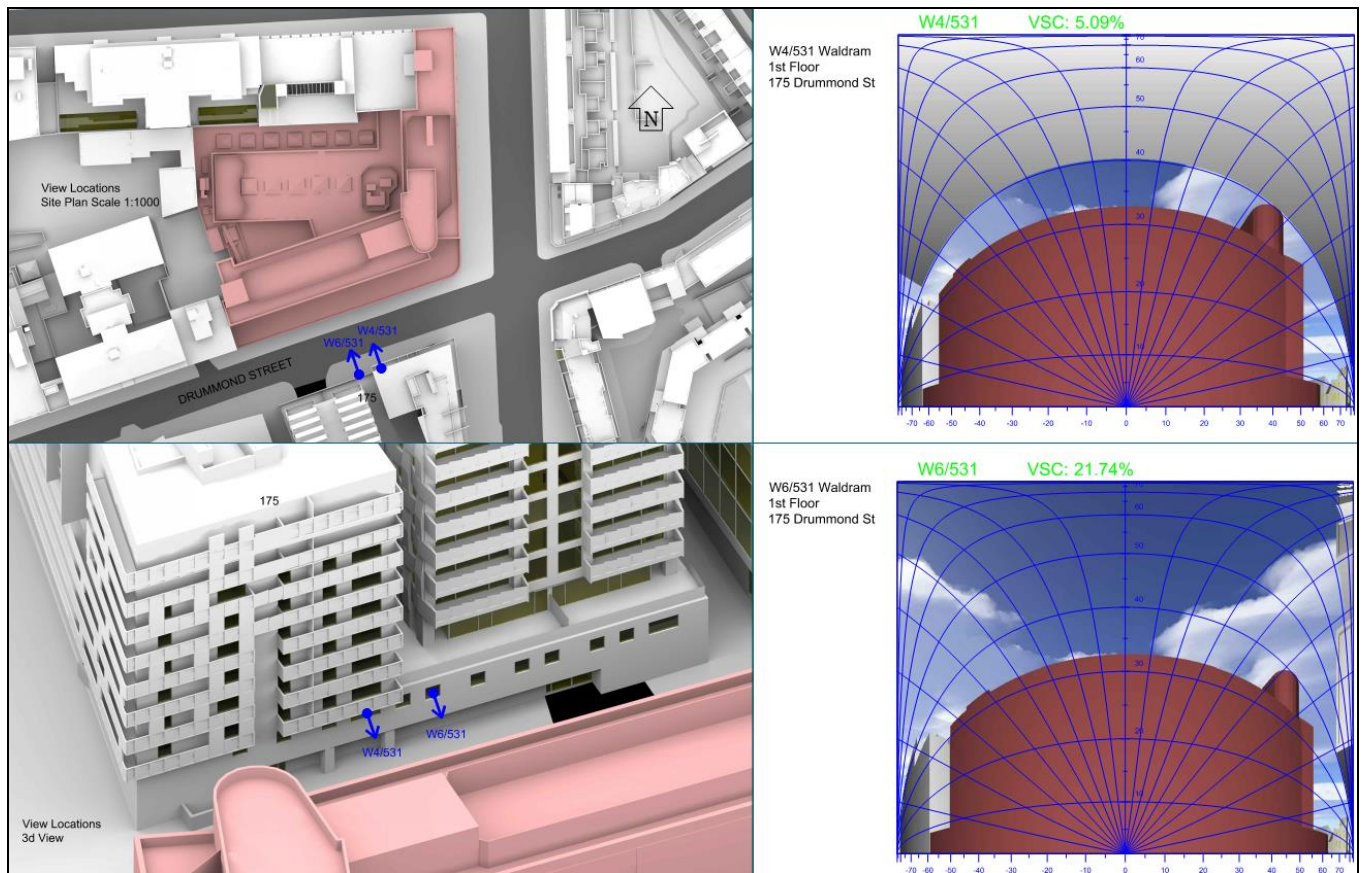


Figure 14 (above): Comparison of a window below a projecting balcony against a window that is not below a balcony at NEQ, 175 Drummond Street. The window below the balcony has a VSC of 5.09% while the one without has a VSC of 21.74%.

11.18 It is worth noting that where existing VSC values are less than 10 VSC, as is the case for the first floor window underneath the balcony in Figure 14 (above), that even an absolute loss of 2 VSC will be expressed as beyond the typical 20% relative change margin. In comparison, when this same absolute reduction for the adjacent unobstructed window is applied, the relative change would be less than 10% (which is well within the BRE recommendation of 20%). It is therefore apparent that there is a clear distortion to the analysis of the relative daylight effect of a proposed development where balconies are present.

11.19 The BRE guidance recognises these limitations and suggests that additional analysis should be undertaken considering the change in daylight (and sunlight) without the balconies in place. Paragraph 2.2.11 of the guidance is quoted below:

‘Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and

proposed situations, without the balcony in place. For example, if the proposed VSC with the balcony was under 0.8 times the existing value with the balcony, but the same ratio for the values without the balcony was well over 0.8, this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light.'

- 11.20 As recommended in the BRE guidance, the applicant's consultant has undertaken daylight and sunlight analysis for all the primary windows and rooms and compared the existing situation against when the balconies have been removed. The results of this comparison demonstrate the profound effect the balconies have on daylight analysis. In the baseline situation, there are some windows reflecting relative changes in VSC of up to 88%. However, when the balconies are removed the relative change (for the same windows) drops to less than 26% in all cases. The high reductions when analysing the existing format are due to the very low existing level of VSC with the balcony in place. The reality is that the level of relative change is low and the figures are distorted by the existing situation. Due to the constraints imposed by the balconies above the windows, which in some cases leads to windows with an existing VSC of less than 5, the reductions caused by the proposed development result in only 51% of the windows meeting the typical BRE guidelines recommendations for VSC. The comparison study shows that in many cases the balconies more than triple the relative change that would ordinarily be reflected. Following the removal of the balconies, the typical VSC reduction (i.e. the mean relative change for all the primary windows) is 16.04%.
- 11.21 The analysis of VSC without the balconies shows that in all but 10 of the windows, the reductions would be less than or within 2% of the typical 20% margin recommended by the BRE. Of the 10 windows that incur a marginally larger relative change, the worst case is a reduction of 25.91%. These 10 windows are located at mezzanine level (i.e. the lowest level of residential accommodation) at the eastern end of the building. They look over the southeast corner of the site, where the recessed corner feature of the existing building is being substantially infilled to meet the height and massing of the Hampstead Road elevation and be more in line with the attached building at 164-166 Drummond Street.
- 11.22 The alternative assessment is in line with the BRE and show that the typical (i.e. mean) change in VSC without distortion from the balconies is less than 16%. The few windows that exceed the typical 20% margin are all within 6% of the BRE guidance.
- 11.23 The NSL analysis is also materially influenced by the presence of the balconies over most of the windows and as a result reflects relative changes that range up to 71% in the base position. However, when the balconies are removed the reductions fall to less than 45% in all cases, with the vast majority being under 40%. Overall, the mean NSL reduction with the balconies removed is 16.34%. Officers consider that the reason for some rooms reflecting higher than the typical 20% relative change margin is largely

due to the design features of the property. A detailed examination of the results shows that where larger reductions are reflected, this relates to rooms that are either very deep in plan form, single aspect and/or have narrow windows located at one side of the room. These factors materially hinder the spread of daylight across the rooms. The BRE guidance acknowledges the limitations in the NSL assessment in para 2.2.10:

‘The guidelines above need to be applied sensibly and flexibly. There is little point in designing tiny gaps in the roof lines of new development in order to safeguard no sky lines in existing buildings. If an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable.’

11.24 The floor plans of the NEQ building are available under planning reference 2007/0823/P. They show that the habitable rooms located opposite the proposal are in excess of 5m deep and single aspect, so fall within the category recognised by BRE guidance above. From measuring the plans, officers calculated that some rooms are in excess of 7m deep with glazing at one end of the room. This limits the spread of daylight. The majority of rooms affected are bedrooms and the BRE guidelines specifically acknowledge that bedrooms are a less important consideration for the NSL analysis. Figure 15 (below) shows the mezzanine level of residential flats within NEQ.

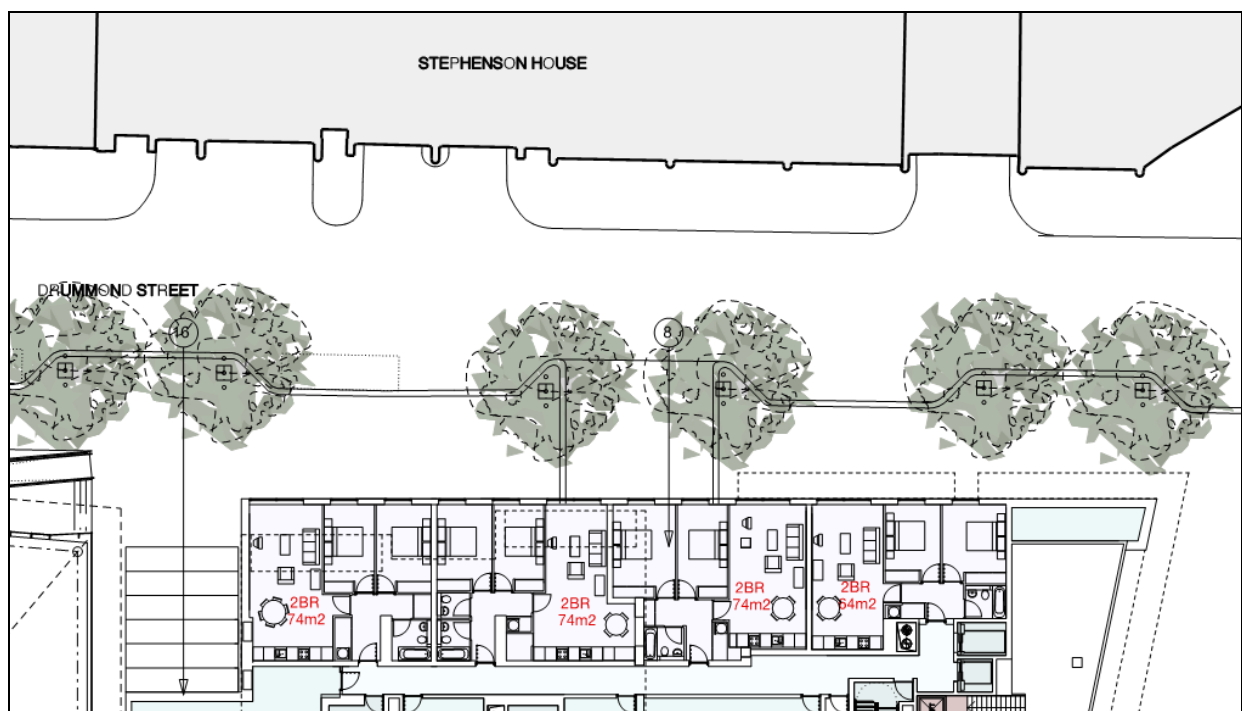


Figure 15 (above): The mezzanine (first floor level) north facing residential units in NEQ, which lie opposite the development. 8 of the 12 rooms are bedrooms (least important type of habitable room in daylight/sunlight terms according to BRE). The rooms have narrow frontages, are single aspect and a deep plan form.

11.25 Officers consider that there are a number of design constraints which materially influence the VSC and NSL results. These design constraints are

recognised by the BRE as needing a more detailed and flexible consideration. The analysis shows that the typical change in VSC across the property is within 20% and in all cases less than 26% (when the balconies are removed for the purposes of the calculation). The change in NSL is larger in some instances; however, this is clearly influenced by the design and use of the rooms, which the BRE recognises is not conducive to the typical NSL parameters.

- 11.26 At present the existing Stephenson House building is an anomaly in the townscape. The building has a recessed corner feature and the Drummond Street elevation is significantly setback above first floor level in relation to the buildings adjacent to it (see Figure 16 below). The proposed development includes the infilling of the corner element and Drummond Street elevation to bring it more in line with the immediate and surrounding context. The BRE guidance states that *'a higher degree of obstruction may be unavoidable if the new developments are to match the height and proportions of existing buildings'*. Given that the height and massing of these elements, which lie directly opposite the NEQ building, would more closely match the height and proportions of existing buildings it is considered that the obstruction is justifiable.



Figure 16 (left): The corner of the building and elevation fronting Drummond Street would be infilled to be similar to the building line and parapet of the attached building at 164-166 Drummond Street (and the Hampstead Road elevation)

- 11.27 All windows in this property that are relevant for sunlight assessment meet the typical recommendations in the BRE guidelines for APSH.
- 11.28 Schafer House, 168-182 Drummond Street – the building is located to the west of the site and contains student accommodation with windows facing out over the site in an eastern direction. Officers recognise the living conditions of these occupiers are less sensitive than for permanent residential units as

users of student flats are transient in nature. Nevertheless, a full analysis of the daylight/sunlight impacts has been provided and considered.

- 11.29 All of the windows tested meet the BRE recommendations in respect of VSC. There are however eight rooms which record relative change in terms of NSL that are slightly beyond the typical 20% change margin recommended by BRE guidelines. The affected rooms are on the third, fourth, fifth and sixth floors on the staggered section of the east facing elevation. They are cluster flats used as student rooms rather than communal areas of the building. The larger reductions are caused by a blinkering effect on one side of the glazing serving the rooms due to the projection of Shafer House adjacent to the window. This design feature has a similar influence to balconies and is specifically acknowledged by the BRE as a limitation that incurs larger reductions, as it restricts the spread of daylight within the room. As stated above, the VSC analysis for the windows in the rooms demonstrates that the daylight potential on the face of the window would not be noticeably affected and therefore it is clear that the effect of the proposed development is proportionate.

- 11.30 All of the windows meet the BRE guidance for the APSH assessment.

Outlook

- 11.31 The existing building is predominantly being infilled to the front of the building on the Drummond Street elevation at floors 2-7 and to the rear of the building at floors 3-4. In addition, the seventh floor above the Hampstead Road elevation is being extended further along the building. The parapet of the building frontage along Hampstead Road and Drummond Street is being increased by 100mm.
- 11.32 The proposed rear additions to the building are staggered in height and setback from the rear habitable rooms and amenity spaces of the surrounding residential occupiers. There would be an additional storey with an atrium element above. The minimum setback of the rear elements from the closest residential occupier at 17-33 William Road is 17m. This setback relates to the additional storey, which is 3.1m higher than the existing building. The atrium element is setback a further 14m and is of a glazed construction. Given the setback of the rear elements, their height, massing and materials, it is not considered that a material loss of outlook or an overbearing impact would result to any of the surrounding residential properties.
- 11.33 The infill element to Drummond Street would be setback on the opposite side of the street to the NEQ, 175 Drummond Street residential occupiers by at least 17.7m. As stated above, the infilling of this part of the building would bring it more in line with the adjacent row of buildings along Drummond Street (164-192). Given the setback of the new built form, which is on the opposite side of a street frontage, it is not considered that the proposal would result in an undue level of harm to adjacent occupiers' living conditions by way of an overbearing impact or material loss of outlook.

Overlooking/loss of privacy

- 11.34 The main parts of the proposals that could impact on neighbouring amenity include the creation of rear commercial terraces and the introduction of residential units. It is not considered that the increase in quantum and changes to the location of the office space would introduce overlooking issues.
- 11.35 The proposed commercial terraces on the third and fourth floors would have conditions attached to control the nature and timing of their use. Their use would be restricted to employment uses (B1) only between 08:00 and 21:00 Monday-Friday. Furthermore, a condition requiring screening and landscaping details would be attached to prevent opportunities for direct overlooking.
- 11.36 The residential units would have habitable rooms and balconies fronting Hampstead Road and to the rear. Windows facing William Road are also proposed. The windows and balconies on Hampstead Road are angled to the southeast so they would not directly overlook the residential properties on the opposite side of the street. Furthermore, the setback of these would be over 24m, meaning that the introduction of mutual overlooking is unlikely. Rear facing windows and balconies are proposed on floors 2-7. These lie adjacent to commercial properties at 7-9 and 11-15 William Road. The setback from the closest residential windows is over 55m. Therefore, overlooking impacts are unlikely to materialise. The windows on the proposed William Road elevation have a setback of 12.8m from the residential premises at 3-18 Prince Regent Mews, 89-101 Hampstead Road (located directly opposite the site on William Road). To prevent mutual overlooking, the windows have been angled so they do not face the adjacent properties. Of the 12 windows proposed on this elevation, 5 would serve bedrooms with the rest serving bathrooms, circulation space/corridors or are secondary windows. It is considered that the windows serving non-habitable rooms could be obscurely glazed. A condition would be attached to require details of the windows on this elevation, including their angle and details of opaque treatment (as required).

Noise and general disturbance

- 11.37 The proposed development includes the creation of a restaurant/café (A3), the retention of retail (A1) and a flexible office/healthcare (B1/D1) unit, the expansion of office space (B1), the introduction of residential units (C3) and plant equipment to support the development. Given the location of the development and the nature of the existing and surrounding uses, the principle of the development is considered acceptable and unlikely to cause undue harm to the living conditions of surrounding residents; subject to suitable details and conditions.
- 11.38 As stated in para 8.10 (above), a 'Noise Impact Assessment' has been submitted to support the application. The report seeks to ensure that the development avoids noise from giving rise to adverse impacts on health and quality of life as a result of new development. It aims to mitigate and reduce noise to a minimum. External noise from new building services plant is assessed using the guidance of BS: 4142, targeting a cumulative noise level 5 dB lower than the background noise level at the nearest noise sensitive

property. If noise contains an impulsive or tonal noise character, noise from plant and machinery would be at least 10 dB lower than the prevailing background noise level. This accords with policy A4 of the Local Plan.

11.39 The submitted report assesses the existing background noise environment and the noise levels of the proposed plant equipment. Instrumentation was setup to measure noise from the upper roof of the existing building facing Hampstead Road, towards the western boundary at the rear of the site and locations on Drummond Street and Hampstead Road near ground level. The external plant noise limits are based on the total cumulative noise level from all new plant associated with the development and would be set within the parameters of policy A4.

11.39 At this stage, the exact locations and technical specification of the plant equipment are unknown, and therefore it is not possible to predict the associated noise levels at the nearest noise sensitive properties. Despite this, it is considered that the plant design is sufficiently flexible to ensure that quiet, non-tonal plant can be procured and mitigation options can be included (e.g. plant enclosures/screening) to ensure the above noise limits are not exceeded (i.e. limited to at least 5/10dB below background levels). Following the final selection of plant items, a number of measures would be employed to ensure the external plant noise level limits are not exceeded. This includes low-noise plant; use of appropriate external acoustic linings around plant areas; atmospheric duct-mounted attenuators on air moving plant and a detailed acoustic mitigation assessment.

11.40 The Council's Environmental Health Officer has reviewed the details and suggested a number of conditions, included the detailed design of plant equipment, secured noise levels and any-vibration measures.

12. Transport and Access

12.1 The site is easily accessible by public transport with a public transport accessibility level (PTAL) rating of 6b (best). It is serviced by a number of buses (with major routes via Hampstead Road and Euston Road) and is within walking distance of a number of underground and rail stations including Regent's Park, Warren Street, Euston Square, Euston and Great Portland Street. Goodge Street, Russell Square and King's Cross & St Pancras International lie further afield. The site is located within the Somers Town (CA-G) Controlled Parking Zone (CPZ).

Car parking

12.2 Policy T2 of the Local Plan requires developments to be car free. There are currently 73 parking spaces within the basement of the site, which can be accessed via Drummond Street. Part b of policy T2 limits on-site parking to spaces that are designated for disabled people, where necessary, and/or that are essential for operational or servicing needs. The proposal would include 4 disabled parking spaces in accordance with the Local Plan. This reduction is welcomed and would limit opportunities for car parking to help reduce car ownership and use, leading to reductions in air pollution and congestion.

12.3 The local area is highly stressed with 112 parking permits available for every 100 spaces within the CPZ. Therefore, the proposed development would need to be car-free. No off-street car parking is proposed and the applicant is willing to restrict the ability of residents to apply for an on-street parking permit via legal obligation.

12.4 Subject to a car-free development being secured as a S106 planning obligation, the proposal would be in accordance with policy T2.

Cycle Parking

12.5 Policy T1 promotes accessible, secure cycle parking facilities as well as the provision of facilities including changing rooms, showers and lockers. The London Plan provides guidance on minimum cycle parking standards and these are outlined in Table 6.3 of the London Plan. To meet the requirements of the London Plan, the following would need to be provided:

- Retail (A1) = 5 Long Stay, 7 Short Stay
- Restaurant/café (A3) = 1 Long Stay, 3 Short Stay
- Office/employment space (B1) = 202 Long Stay, 8 Short Stay
- Residential (C3) = 33 Long Stay, 1 Short Stay
- Overall = 241 Long Stay, 19 Short Stay

12.6 The proposal includes 283 spaces overall, including 30 visitor/short stay Sheffield stands. The overall quantum comfortably exceeds the London Plan's minimum standards in line with policy T1.

12.7 230 spaces are proposed for the office/retail staff within the basement. Access is provided from Drummond Street, via either a ramp down from the street or through an internal lift. Officers note that the existing ramp has a relatively steep gradient of 1:8 and that it is the existing access arrangement to the basement for cycle parking. As stated above, the number of car parking spaces is being reduced by 69 (down to 4 disabled spaces) to reduce potential conflicts. Deliveries are expected to be infrequent, to occur within the ground floor loading bay and would largely be scheduled outside of peak hours. The ramp is 3m wide (excluding kerbs), giving enough room for the largest vehicle able to enter the basement (car derived van, width of 1.7m) and cyclists to pass at low speeds. Signage would be incorporated to advise cyclists to dismount and to alert drivers to the presence of cyclists. Due to the above factors and given that an alternative to the ramp exists through a lift, the access arrangements are considered to be acceptable. Large changing rooms with showers, locker and toilet facilities are included within the basement. These facilities would encourage and promote the use of the cycle parking.

12.8 A separate dedicated cycle store for the residential units would be located at street level adjacent to the residential entrances on Hampstead Road. 33 spaces are proposed in accordance with the London Plan.

- 12.9 15 Sheffield stands (providing 30 spaces) are proposed in various locations on Drummond Street and Hampstead Road. These spaces would be provided for visitors to the site. The stands are located outside of the applicant's ownership so would need the relevant permissions. The spaces on Hampstead Road are located on part of the Transport for London Road Network (TLRN) meaning that they would need to be approved by TfL.
- 12.10 The design of the cycle parking is in line with CPG7 (Transport) and is deemed fit for implementation. A planning condition would be secured if permission is granted to secure the 283 spaces.

Deliveries and servicing

- 12.11 Servicing for the existing building is conducted from Drummond Street, making use of off-street servicing bays. This is proposed to continue for the proposed development, with the basement being utilised for smaller deliveries. Residential deliveries would be undertaken from the existing loading bay on Hampstead Road, with an overflow area on William Street. These deliveries would be minimal with a maximum of 5-9 per week, consisting primarily of refuse, mail and food store deliveries. The commercial based deliveries are not anticipated to make a significant impact on the public highways, as the site is already in use and has an estimated 20 deliveries a day. This is expected to rise by only 4-5 additional trips which would all be off-street.
- 12.12 Officers therefore do not consider that a service management plan would be required for this site, as the development would have little impact over and above the existing site arrangements and adequate facilities have been designed into the building to ensure servicing can be carried out safely and mostly off-street.

Travel planning

- 12.13 The proposed development would lead to an increase of 307 additional two way trips to the site. This includes office, retail and residential. The site is currently operational and already generates a large number of trips; however, with the removal of all general car parking on-site (69 spaces), this would lead to more sustainable travelling methods. The total number of two way trips for the development is predicted to be 4,276 for the office and retail uses and 17 for the residential units (daily). It is therefore important to promote sustainable travel due to the number of trips associated with the development.
- 12.14 If planning permission is granted a final travel plan would need to be secured via S106, prior to the occupation of the development. The planning obligation would include a requirement for a Travel Plan Co-ordinator to be appointed, to manage sustainable transport promotions. The office and retail space would have the most significant number of trips and therefore the travel plan would need to focus on workers and visitors for these spaces.
- 12.15 The Council would secure a financial contribution of £6,020 to cover the costs of monitoring and reviewing the travel plan over a 5 year period. This would need to be secured by S106.

Highways works

- 12.16 The Local Plan states, under policy A1, that '*Development requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces.*' Any damage to facilitate the development would need to be repaired and the Highways Authority would need to make minor alterations to the footway on Drummond Street. The highways work carried out by the Council would be limited to Drummond Street as Hampstead Road is part of the TLRN and under the jurisdiction of TfL. The developer will need to enter in to a Section 278 agreement with TfL, which will be separate to the planning process. This S278 would include details of the visitor cycle parking, which is referred to above (para 12.9).
- 12.17 A highways contribution (estimate to be confirmed by the Council's Engineering Service) for any repair, repaving and tying in works created by the development would be secured via a S106 planning obligation if planning permission is granted.

Pedestrian, Cycling and Environmental Improvements

- 12.18 New developments of a large scale can have wider impacts and may increase the demands on a transport network that at certain times already operate above capacity. Paragraphs 10.10-10.13 of CPG8 (Obligations) state that the Council may seek contributions to enhance the existing provision of public transport services and fund area-based network improvements. Given the scale of the proposed development, a contribution towards pedestrian, cycle, and environmental improvements has been negotiated.
- 12.19 The Council is currently implementing the West End Project (WEP), which is a £41 million development to encourage walking and cycling as the primary modes of transport. The proposed development would increase the footfall of people using this area through traveling to and from the site each day, putting additional burden on the surrounding roads and reducing pedestrian comfort. To accommodate this the Council would therefore need to include further improvement to the area outside the remit of the WEP to better facilitate the new users, encourage the use of more sustainable transport and reduce overcrowding issues. A financial contribution of £350,165.06 as a S106 planning obligation would therefore be secured.

Construction management

- 12.20 The development would require a significant amount of demolition, refurbishment and construction works. It would generate a large number of construction vehicle movements during the project in this busy central location. The WEP, which is Camden's largest transport scheme, will be commencing shortly on streets near the site and it would be essential to co-ordinate any works between the two to ensure there is no conflict or impact on the wider transport network.

- 12.21 The upcoming High Speed 2 (HS2) scheme would have a major impact on the proposal, with a number of developments and alterations to the immediate area to facilitate the extension to Euston Station. While the main HS2 development does not start for at least 3-5 years, it would have to be taken into consideration given that smaller facilitating developments are likely to be starting while Stephenson House is expected to be under construction. The logistics of a large number of construction vehicles in the area would need to be co-ordinated to limit cumulative impacts.
- 12.22 The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.
- 12.23 For the above reasons a Construction Management Plan (CMP) would need to be secured as a S106 planning obligation, with the requirement that freight movement should be limited between 9:30am to 4:30pm Monday to Friday and 8am until 1pm Saturdays, with no deliveries on Sundays and bank holidays unless agreed beforehand. The CMP would need to be approved by the Council prior to any works commencing on-site. A satisfactory amount of pre-commencement consultation on the proposed construction arrangements would need to take place.
- 12.24 A CMP Implementation Support Contribution of £50,000 would need to be secured via S106 if planning permission is granted. This is a higher contribution than normal due to the difficulties of constructing in such a densely developed area, the proximity with major schemes such as the WEP and HS2 and therefore additional work would be required by Council officers.

Stopping up order

- 12.25 The proposal includes the infilling of the colonnade facing Hampstead Road. The area to the north of the site, near the corner of William Road and Hampstead Road, is currently accessible to the public and this area would need to be stopped up in accordance with section 31 of the Highways Act 1980. This stopping up order would need to be secured as a S106 legal obligation as required by section 247 of the Town & Country Planning Act 1990 (as amended). The head of term would include a financial contribution to cover the processing of the order, which would equate to £24,155.17.

Summary of requirements

- 12.26 The proposal would be acceptable in terms of transport implications subject to various conditions and S106 planning obligations being secured:
- Condition to secure the provision and ongoing maintenance of 283 secure cycle parking spaces
 - S106 – Car-free development
 - S106 - Construction Management Plan (CMP)
 - S106 – CMP Implementation Support Contribution of £50,000
 - S106 - Workplace Travel Plan and associated monitoring fee of £6,020
 - S106 - Highways contribution (estimate to be made) and levels plans

- S106 - Pedestrian, Cycling, Environmental, and Public Realm improvements financial contribution of £350,165.06
- S106 – Stopping up order and financial contribution of £24,155.17.

13. Nature Conservation and Biodiversity

- 13.1 The planning application is supported by a 'Biodiversity Report' by FOA Ecology. The consultant undertook an ecology survey of the site, including a building inspection. It is noted that the only semi-natural habitat present at the site is a trivial amount of scattered ephemeral, short perennial 'weedy-type' vegetation. The site does not contain any national priority habitats and no national or local Camden priority species were noted on-site during the survey. Based on the findings, the report recommends precautionary mitigation measures, lighting spillage should be minimised during and post construction, good construction/building/material storage practices, sensitive clearance and contractor awareness as well as the retention and protection of existing ecological features where practicable. The scheme includes the creation of living roof sections, the use of wildlife-friendly species in new planting and the provision of artificial habitats
- 13.2 A Conservation Ecologist from the London Wildlife Trust assessed the details on behalf of the Camden Nature Conservation Service. A number of planning conditions were recommended including a method statement for site works, a lighting statement, detailed submission of planting proposals and details of bat bricks/boxes, bird boxes and bug boxes. Subject to these details being reserved by planning condition, the development is considered to be in accordance with policy A3.

14. Sustainable Design and Construction

- 14.1 The Local Plan requires development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Policy CC2 of the emerging Local Plan requires development to be resilient to climate change through increasing permeable surfaces and using Sustainable Drainage Systems, incorporating bio-diverse roofs/green and blue roofs/green walls where appropriate and including measures to reduce the impact of urban and dwelling overheating.
- 14.2 To comply with the London Plan the proposal must secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L of the Building Regulations 2013. Where the London Plan carbon reduction target cannot be met on-site, the Council may accept the provision of measures elsewhere in the borough or a financial contribution (charged at £90/tonne CO2/year over a 30-year period) to secure the delivery of carbon reduction measures elsewhere in the borough.
- 14.3 The proposals for the site are for a mixed-use development with offices, retail and residential units. All viable measures within the 'be Lean, be clean and be

green' sections of the energy hierarchy have been maximised for the development. The proposed development would achieve a carbon reduction of 10.3% for the commercial elements, 36.1% for the residential and an overall weighed reduction of 19.09%. The measures to reduce energy from the development include high efficiency communal gas fired boilers delivering water heating (low NOx); high efficiency variable refrigerant flow (VRF) units; 400m² of solar PV; A and A+ rated white goods (where applicable); 100% low energy and/or LED internal lighting; solar thermal facilities and green/blue roofs. The provision of renewable energy and the site-wide emissions reduction of 19.09% beyond Part L would need to be secured via S106 within an Energy Efficiency and Renewable Plan. Details of the solar panels, solar thermal facilities and green roof would be secured via planning condition in the event planning permission is granted.

- 14.4 As the carbon reduction target of 35% cannot be met on-site, the Council in this instance would accept a financial contribution of £231,993 to be secured via S106. The financial contribution is calculated based on the failure to reduce carbon by 128.93 tonnes per year (111.23 for non-residential floorspace and 17.7 for residential) x £1,800 = £231,993.
- 14.5 The site is not currently connected to an existing decentralised energy network. There is potential for the development of a network within the area as outlined in the Euston Area Plan. Details have been submitted to justify that the potential scope for connecting to a district heating network is limited, even in the event of a nearby network being constructed. A communal heating system is therefore proposed. It would be future proofed to enable connection to a heat network, should it be considered viable in the future. Future proofing details would be secured through legal agreement.
- 14.6 A BREEAM pre-assessment has been submitted confirming that the newly constructed office would produce a score of 72% and the retail 73.5%. The development would need to meet minimum credit scores for water materials and energy categories. Sustainability measures would need to be secured through a S106 sustainability plan, indicating BREEAM 'Excellent' and minimum credit targets in Energy (60%), Materials (40%) and Water (60%). Water efficiency targets would be secured by planning condition.

15. Air Quality

- 15.1 The Local Plan requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality.
- 15.2 The development would be car-free (apart from disabled parking spaces) and is not expected to generate traffic. A Travel Plan has been prepared and would be secured via S106, which would encourage cleaner modes of travel to the development. The proposed building emissions are below the air quality neutral benchmark. Therefore, the development is considered to be better than air quality neutral and no further mitigation is required.

- 15.3 Overall, the development is considered to be a 'Medium Risk' for dust soiling effects and a 'Low Risk' for PM10 health effects, in the absence of mitigation. Following the implementation of mitigation measures during the construction phase as outlined in the Air Quality Assessment, including techniques to minimise impacts from dusts and fine particles, the impact risk is reduced to 'Negligible'. Mitigation methods to control construction related air quality impacts would be secured within the CMP via S106. In addition, a condition relating to air quality monitoring would be attached to any planning permission.
- 15.4 The proposed residential units are located near monitoring locations that show annual mean concentrations of NO₂ consistently above 40µg.m⁻³ AQO. Defra background levels are above the annual objective. NO₂ concentrations are predicted to decrease with height and the upper level residential are predicted to be within limits. To reduce the impacts of poor air quality on building occupants, affected units would include mechanical ventilation with NO_x filters where necessary. A condition would be attached, subject to planning permission being granted, for full details of the mechanical ventilations system including air inlet locations and details of NO_x filters. Air inlets would need to be located away from Hampstead Road and as close to roof level as possible.

16. Trees and Landscaping

- 16.1 The site contains a lack of public open space, external amenity areas and soft landscaping features within its boundary. The building has a significant setback from Hampstead Road, with a wide area of the pavement and the road itself under the ownership of Transport for London (TfL). Within this wide footway is a row of mature Dawn Redwood trees. A planning condition would be attached to any approval requiring tree protection details to ensure these are preserved during construction.
- 16.2 A 'Landscape Design and Access Statement' has been submitted in addition to the other supporting documents. It details the landscaping proposal, including a combination of terraces, pocket gardens and green screens to enhance the building. The most heavily landscaped areas include first, third and fourth floor rear terraces; pocket gardens on the second, third and fourth floors and terraces to the front of the building on the sixth and seventh floors (see Figure 17 (below)). Smaller balconies and terraces exist in other parts of the development. The planting would establish a character and identity of planting types and performance that would respond to the different levels and soil depths. Each landscaped area would be characterised by a different planting style. Ascending the levels, the planting would progress from a more cultivated garden style to a more naturalistic, informal style. Planting would reference a range of different landscape characters from across the United Kingdom.
- 16.3 Details of works to public realm have been submitted; however, these works fall outside the ownership of the applicant and the realms of the development. Any improvements to the adjacent streetscape would therefore need to be

agreed with TfL on Hampstead Road and the Highway Authority on Drummond Street.

- 16.4 The introduction of landscaping to this building is welcomed and would enhance the appearance of the building whilst providing meaningful amenity spaces for its users. Indicative planting details and landscaping layouts are given. It is recommended that details are required by planning condition.

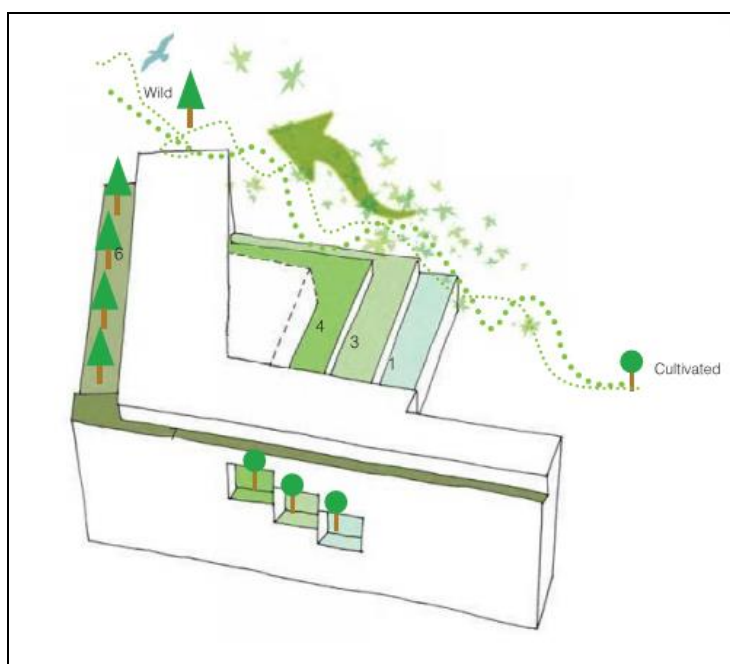


Figure 17 (left): Main landscaped areas within the scheme, including the pocket gardens and terraces to the front and rear of the building.

17. Flooding and Drainage

- 17.1 The NPPF requires all major developments to include Sustainable Urban Drainage Systems (SUDS) unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014). Major developments should achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in run off rates. Development should also follow the drainage hierarchy in policy 5.13 of the London Plan.
- 17.2 The proposal is for all rainwater to be routed from the building via gravity. This would be achieved through a series of blue and green roof areas that would control and slow the flow of rainwater collected. It has been demonstrated that the proposal would reduce the peak surface water flow from the building by at least 50% whilst achieving a gravity connection to the sewer. Further details of green roofs and rainwater harvesting, along with detailed information on the maintenance of the SUDS proposal, have been submitted following requests by the Council's Sustainability Officer. Overall, the application includes an acceptable assessment of available options in accordance with the drainage hierarchy. The details would be secured via planning condition.

18. Community Safety

- 18.1 Policy C5 requires developments to demonstrate that they have incorporated design principles that contribute to community safety and security. A 'Crime Prevention Statement' has been submitted as part of the Design and Access Statement, which was created in consultation with the Designing Out Crime Officer. The development incorporates specifically designed doors, windows, post boxes, stores, access control, utility meters, lifts, lighting, CCTV and alarms.

19. Waste

- 19.1 The office, healthcare and retail uses would adopt a waste strategy as per the existing development. A loading bay and refuse storage area is located on Drummond Street to serve the offices and healthcare use. For retail and the restaurant uses, waste would be stored internally before being collected from the street as per the existing arrangement. A residential bin store is proposed for the market and affordable units on the William Road elevation.
- 19.2 A condition is recommended prior to the occupation of the development for details of the location, design and method of waste storage and removal including recycled materials for both the commercial and residential uses. The final details would need to be agreed the Council's Principal Environmental Services Officer.

20. Local employment and procurement

- 20.1 The proposed development is large enough to generate significant local economic benefits. Policy E1 and CPG8 (Planning Obligations) state that in major developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the borough to secure contracts to provide goods and services. A range of training and employment benefits would be secured via S106 to provide opportunities during and after the construction phase for local residents and businesses. This would include:
- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8.
 - The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
 - The applicant should provide a specified number (to be agreed) of construction and non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre or the Council's work experience broker.
 - As the build costs of the scheme exceed £3 million the applicant must recruit 1 construction or non-construction apprentice per £3 million of

build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.25 of CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.

- The applicant to sign up to the Camden Local Procurement Code, as per section 8.30 of CPG8.
- The S106 should broker a meeting between the end user and the Economic Development team to discuss employment and skills objectives.
- The applicant should provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.
- The applicant must recruit a specified number (to be agreed) of non-construction apprentices to be employed at the development and pay the council a support fee of £1,700 per apprentice as per clause 8.26 of CPG8. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
- Alongside the normal construction phase requirements, the Council would secure a cash contribution towards employment and skills opportunities for residents as this scheme represents an uplift in employment floorspace of more than 1000m². The amount would be £158,547.57. In line with CPG8 para 8.32, the amount is calculated as follows:

Net increase in employment floorspace (5,919m²)/Floorspace per employee (12) = FTE jobs created (493)

FTE jobs created (493) x % of Camden employees in the workforce (23%) x % of Camden residents requiring training (35%) x £3,995 (cost of training per employee) = £158,547.57 (figure dependent on exact increase in floorspace proposed)

21. Play and Open Space

- 21.1 The Local Plan requires an 'appropriate contribution' to open space, with priority given to publicly accessible open space. Policy A2 gives priority to securing new public open space on-site, with provision of space off-site near to the development acceptable where on-site provision is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision. The application site is entirely covered by a basement and built form above. The building is built up to the boundary on all sides, with the boundaries facing either public highways or adjacent buildings. There is currently no public open space on the site and it is not considered feasible to provide any. External amenity spaces are provided for the residential and employment uses and it would not be possible

to provide these to the public given their nature and sensitivity. Overall, 1,885m² of external space is being provided within the residential balconies/terraces, office roof terraces and office pocket garden balconies. This is welcomed given that none is currently available.

- 21.2 The scheme provides 17 residential units with an additional 5,919m² (GIA) of office floorspace. Based on the increased demand for open space from the uplift in residents and workers occupying the site, provision of open space is expected. As there is no realistic means of direct provision, the scheme would be acceptable and in accordance with policy subject to a S106 financial contribution to local open space provision.
- 21.3 CPG6 requires 9m² of open space per residential occupier and 0.74m² per worker. Based on the number of units provided and their size the development it would provide space for 67 occupiers. The development would have a net increase in employment and healthcare space of 5,098m² (GIA) which would be divided by 12 (space requirement per full-time employment) to give 424 workers. Therefore, the open space requirement for the development would be 603m² (67 x 9) for the residential component and 313.76m² (0.74 x 214) for the employment uses (both figure GIA). A payment in lieu of the 916.76m² requirement must therefore be calculated towards the provision, maintenance and improvement of open space in accordance with CPG6 (Amenity) and CPG8 (Planning Obligations) must be calculated.
- 21.4 The financial contribution has been calculated in accordance with figure 4 of CPG8 with the workings for the required payment of £33,276 below:

	Capital Cost	Maintenance	Design and Project Management	Total
1 bed (1)	£385	£386	£46	£817
2 bed (9)	£5,967	£5,049	£720	£11,736
3 bed (3)	£3,978	£2,763	£477	£7,218
Employment Space (per 1,000m ²)	£6,325	£6,420	£760	£13,505
Total				£33,276

22. Contaminated Land

- 22.1 The site has been occupied by a number of commercial buildings throughout its history including warehouses and a varnishers prior to the existing commercial office building. In addition, many of the surroundings sites are recorded as having a potentially contaminative history including use as a timber yard, a printing works, furniture works and vehicle repair garages and a sunken fuel tank is known to have been present immediately to the north of the site.

- 22.2 A 'Desk Study Report' by Geotechnical & Environmental Associates Limited was submitted as part of the application. The preliminary risk assessment does not anticipate any remedial works to be required as part of the development; however, it recommends tests samples of the shallow soil for a range of contaminants for the purpose of waste disposal classification.
- 22.3 On this basis, it is recommended that contaminated land conditions be attached to any approval for medium-risk situations. This would include a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas; an investigation in accordance with the approved programme and a written scheme of remediation measures (if necessary).

23. Section 106 Obligations

- 23.1 The 'Heads of Terms' embodied in the S106 legal agreement referred to above would include the following:
- **Affordable housing** – 7 on-site social-affordable rent units at London Affordable Rent
 - **Affordable housing viability review** - deferred payment in lieu of on-site affordable housing/housing shortfall capped at £956,385
 - **Construction/Demolition Management Plan (CMP)** - including monitoring contribution of £50,000
 - **Car-free** - for all uses
 - **Local employment, skills and local supply plan** - including a contribution towards employment and skills opportunities £158,547.57
 - **Highways contribution (TBC)**
 - **Workplace Travel Plan** - including monitoring contribution of £6,020
 - **Public Open space contribution** - £33,276
 - **Sustainability Plan** – BREEAM 'Excellent' with minimum credit targets in Energy (60%), Materials (40%) and Water (60%)
 - **Energy Efficiency and Renewables Plan** – 19.09% site-wide emissions reduction beyond Part L 2013
 - **Carbon offset contribution** - £231,993
 - **CHP and future proofing details for connecting to a decentralised energy network**
 - **Level Plans**
 - **Pedestrian, Cycling, Environmental, and Public Realm improvements** - financial contribution of £350,165.06
 - **Stopping up order** – financial contribution £24,155.17

24. Community Infrastructure Levy (CIL)

- 24.1 The proposal would be liable for both the Mayor of London's CIL and Camden's CIL due to the significant net increase in floorspace and creation of residential units. The Mayoral CIL rate in Camden is £50 per m² and the Camden CIL tariff (based on the site being in Zone A (central) would be £150 per residential unit, £25 per m² and £45 per m². The amount payable would be calculated by Camden's CIL team.

25. CONCLUSION

- 25.1 The proposed development would result in a comprehensive, mixed-use redevelopment of the existing building, leading to the following benefits:

- 6 on-site affordable housing units as social-affordable rent
- additional office floorspace, with an uplift of 5,919m² (GIA), and provision of high quality and flexible spaces
- provision of 17 residential units that would result in a high standard of living accommodation for the prospective occupiers
- redevelopment of a site that detracts from the townscape and the provision of a high quality built development
- large creation of landscaped and green spaces
- enhancement of the active frontages along Hampstead Road and Drummond Street
- retention and improvement to the existing healthcare use
- reduction of car parking spaces from 73 spaces to 4 disabled spaces only
- significant contributions towards the provision of local infrastructure and facilities are proposed through Community Infrastructure Levy, financial contributions in the S106 and public realm improvements

- 25.2 Paragraph 14 of the NPPF states that there is a presumption in favour of sustainable development, which should be a golden thread running through decision-making. The dimensions of sustainable development are economic, social and environmental which should be sought jointly. The proposed development would result in significant benefits through all three strands of sustainable development without any adverse impacts significantly or demonstrably outweighing them. On balance, the development is considered to be appropriate and in accordance with relevant National and Regional Policy, the Camden Local Plan 2017 and Camden Planning Guidance for the reasons noted above.

- 25.3 Planning Permission is recommended subject to a S106 Legal Agreement securing the clauses set out in paragraph 23.1 (above) and the planning conditions below (paragraph 26.1).

26. LEGAL COMMENTS

- 26.1 Members are referred to the note from the Legal Division at the start of the Agenda.

Condition(s) and Reason(s): **2017/3518/P**

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Existing Drawings: A-0001-PL; A-(0101-0110)-PL; A-(0130-0136)-PL and A-(0140-0141)-PL.

Proposed Drawings: A-0002-PL; A-0201-PL Rev B; A-0202-PL Rev A; A-0203-PL; A-(0204-0209)-PL Rev A; A-(2010-0211)-PL; A-(0300-0306)PL; A-(0400-0401)-PL; SK-143 and SK-144.

Supporting Documents: Drainage Statement Report Rev P01 dated June 2017; Design and Access Statement dated 01/10/2017 (Rev A); A Financial Viability Assessment in support of the Planning Application dated June 2017; Energy Statement Rev P02 dated June 2017; Internal Daylight Report dated July 2017; Desk Study Report dated July 2017; Residential Energy Strategy Notes; Affordable Housing Statement dated July 2017; Sustainability Statement (ref: 2017.041) dated June 2017; Delivery and Servicing Management Plan (ref: JDF/JLLS/16/3476/TN01) dated June 2017; Travel Plan (ref: WTT/JLLS/3473/TP01) dated June 2017; Transport Statement (ref: WTT/JLLS/16/3473/TS01) dated June 2017; Landscape Design - Design and Access Statement dated June 2017; Air Quality Assessment dated June 2017; Planning Statement (ref: LJW/CKE/VHA/J10346) dated June 2017; Biodiversity Report dated June 2017; Noise Impact Assessment (ref: R6723-1 Rev 1) dated 19/05/2017; Statement of Community Involvement dated June 2017; Planning Stage Construction Methodology Rev 1 dated June 2017; Surface Water Drainage (SuDS) Strategy (ref: QFRA 649) dated 10/03/2017; Daylight and Sunlight Report dated June 2017; Thermal Comfort Analysis (ref: Z8810A) dated 08/09/17; L1A 2013 - Regulations Compliance Report; Surface Water Disposal Strategy dated September 2017 and Addendum Note for the Financial Viability Assessment dated 16/08/2017.

Reason: For the avoidance of doubt and in the interest of proper planning.

- 3 Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:
- a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills, external doors and gates
 - b) Plan, elevation and section drawings, including fascia, cornice, entrances, pilasters and glazing panels of the ground floor facades/shopfronts at a scale of 1:10
 - c) Manufacturer's specification details of all facing materials (to be submitted to the local planning authority) and samples of those materials to be provided on site, including a sample panel of the facing brickwork demonstrating the proposed colour, texture, face-bond and pointing
 - d) Plan, elevation and section drawings of the balconies and balustrades
 - e) Details of all lighting to the public realm including external lighting to the elevations, lighting of entrance areas, control of access points and CCTV
 - f) Plan, elevation and section drawings of the glazed feature lantern

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan June 2017.

- 4 No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy D1 of the London Borough of Camden Local Plan 2017.

- 5 Prior to the occupation of the development, full details of screening, balustrade treatment and other measures to reduce instances of overlooking and loss of privacy to neighbouring occupiers from the commercial and residential terraces and balconies within the development and details of the glazing (angles and opaque treatment) of the residential windows on the William Road elevation, shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the details thereby approved and permanently maintained thereafter.

Reason: In order to prevent unreasonable overlooking of neighbouring premises in

accordance with the requirements of policy A1 of the Camden Local Plan 2017.

- 6 Prior to the occupation of the development, full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. The details should include a planting proposal that offers biodiversity benefits to incorporate native species and be in keeping with local habitats. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3 and D1 of the London Borough of Camden Local Plan 2017.

- 7 All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development/prior to the occupation for the permitted use of the development or any phase of the development, whichever is the sooner. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3 and D1 of the London Borough of Camden Local Plan 2017.

- 8 Prior to the commencement of any works on site (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), details demonstrating how trees to be retained during construction work shall be submitted to and approved by the local planning authority in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the London Borough of Camden Local Plan 2017.

- 9 The retail/restaurant (A1/A3) uses hereby permitted shall not be carried out outside the following times: 07:00hrs to 23:30hrs Monday to Thursday and 07:00hrs to 00:00hrs Friday and Saturday and 08:00hrs to 23:00hrs on Sundays and Bank Holidays.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1, A4 and TC1 of the Camden Local Plan 2017.

- 10 The approved office amenity spaces to the front and rear of the building on the first, third, fourth, sixth and seventh floors, as shown on drawing numbers A-0203-PL; A-(0205-6)-PL and A-(0208-11)-PL, shall be used by the office (B1a) uses of the building only and shall not be used outside the hours of 08:00 and 21:00 Monday-Friday.

Reason: In order to prevent unreasonable overlooking of neighbouring premises and noise and general disturbance in accordance with the requirements of policy A1 Camden Local Plan 2017.

- 11 Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, and A1 of the London Borough of Camden Local Plan 2017.

- 12 The noise level in rooms at the development hereby approved shall meet the noise standard specified in BS8233:2014 for internal rooms and external amenity areas.

Reason: To safeguard the amenities of occupiers of the proposed use, adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the Camden Local Plan 2017.

- 13 Prior to occupation of the hereby approved development, details of the location, design and method of waste storage and removal including recycled materials, for all uses on-site, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policies A1 and CC5 of the Camden Local Plan 2017.

- 14 Prior to the occupation of the development, details of secure and covered cycle storage area for 283 cycles shall be submitted to and approved by the local planning authority. The approved facilities shall thereafter be provided in its entirety prior to the first occupation of any of the new units, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

- 15 The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted and approved by the Local Planning Authority.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC1, CC2 and CC3 of the Camden Local Plan 2017.

- 16 All units hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2) with at least 10% designed and constructed in accordance with Building Regulations Part M4 (3) adaptable.

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy H6 of the Camden Local Plan 2017.

- 17 All external doorways, except for fire doors or for access to utilities, should not open outwards towards the public highway/footway/pedestrian route through the site. The proposed doors must either open inwards or have a sliding door so they do not restrict the flow of pedestrians or risk being opened onto those passing by.

Reason: In order to enhance the free flow of pedestrian movement and promote highway safety and amenity in accordance with policies D1 and T1 of the Camden Local Plan 2017.

- 18 All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the demolition and construction phase of the development.

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies CC1, CC2 and CC4 of the Camden Local Plan 2017.

19 At least 28 days before development commences:

- (a) a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas shall be submitted to and approved by the local planning authority; and
- (b) following the approval detailed in paragraph (a), an investigation shall be carried out in accordance with the approved programme and the results and a written scheme of remediation measures [if necessary] shall be submitted to and approved by the local planning authority.

The remediation measures shall be implemented strictly in accordance with the approved scheme and a written report detailing the remediation shall be submitted to and approved by the local planning authority prior to occupation.

Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy A1 of the Camden Local Plan 2017.

20 The servicing strategy of the approved development shall be undertaken in accordance with the details within the Delivery and Servicing Management Plan (ref: JDF/JLLS/16/3476/TN01) dated June 2017. Servicing for the commercial uses will be conducted from Drummond Street, making use of off-street servicing bays, with the basement being utilised for smaller deliveries. Residential deliveries will be undertaken from the existing loading bay on Hampstead Road, with an overflow area on William Street

Reason: To avoid obstruction of the surrounding streets and to safeguard amenities of adjacent premises in accordance with the requirements of policies A1 and T4 of the London Borough of Camden Local Plan 2017.

21 Prior to the occupation of the development, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings, namely [eg. living room and kitchen above bedroom of separate dwelling]. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of the prospective residential occupiers of the development and the area generally in accordance with the requirements of policies G1, D1 and A1 of the Camden Local Plan 2017.

22 Prior to the occupation of the development, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ ceiling/ walls separating the commercial part(s) of the premises from noise sensitive premises. Details shall demonstrate that the sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the criteria of BS8233:2014

within noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of the prospective residential occupiers of the development and the area generally in accordance with the requirements of policies A1 and A4 of the Camden Local Plan 2017.

- 23 Prior to commencement of the any plant equipment, full details (including plans, elevations, manufacturers' specification and sections) of the proposed plant equipment and compounds shall be submitted to and approved by the local planning authority prior to that element of work. The details shall include details of the external noise level emitted from plant/machinery/equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/equipment will be lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. A post installation noise assessment shall be carried out where required to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of occupiers of the proposed use, adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the Camden Local Plan 2017.

- 24 During any internal or external demolition of buildings or any site clearance, a precautionary measure is required that all contractors are aware of potential roosting bats and that external features such as roof tiles and other features which may support bats (i.e. areas with cracks or holes providing access routes for bats) should be removed by hand. There is a required formalisation of a protocol as to the steps to be taken in the event that a bat or bats is/are found during the demolition works. Should bats or their roosts be identified then works must cease and the applicant will be required to apply for, and obtain, a European Protected Species Licence and submit proof of this to the authority before work recommences. Additionally they will be required to submit a method statement detailing features to be retained and added to site to maintain and replace roost and foraging features on the site.

Reason: In order to ensure the development safeguards protected and priority species in accordance with policy A3 of the Camden Local Plan 2017.

- 25 The demolition of buildings or any site clearance should be undertaken outside the breeding bird season (i.e. it should be undertaken in the period September to January inclusive). Should it prove necessary to undertake demolition or clearance works during the bird nesting season, then a pre-works check for nesting birds should be undertaken by a qualified ecologist. If any active nests are found, works should cease and an appropriate buffer zone should be established (the qualified ecologist would advise). This buffer zone should be left intact until it has been confirmed that the young have fledged and the nest is no longer in use.

Reason: In order to ensure the development safeguards protected and priority species in accordance with policy A3 of the Camden Local Plan 2017.

- 26 Prior to the occupation of the development, a detailed submission of any additional biodiversity enhancement features such as bat bricks or boxes, bird boxes or bug boxes is required to be submitted and approved by the local planning authority. This is to include designs and location details of these biodiversity enhancement features.

Reason: To assess the development's their ability to realise benefits for biodiversity through the layout, design and materials used, in accordance with policies G1, CC1, CC2, CC3, D1 and A3 of the London Borough of Camden Local Plan 2017.

- 27 Prior to occupation of the development, a lighting statement showing detailed lighting including lux and proposed projections of the external areas is required, especially for the terraces, shall be submitted to and approved in writing by the Council. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard and protect priority species in accordance with policy A3 of the Camden Local Plan 2017.

- 28 Prior to the solar panels and system being implemented, detailed plans showing the location and extent of photovoltaic cells and solar thermal system to be installed on the building shall be submitted to and approved by the local planning authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed in full accordance with the details approved by the local planning authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan.

- 29 Full details in respect of the green roof in the area indicated on the approved roof plan shall be submitted to and approved by the local planning authority before the relevant part of the development commences. Details of the green roof provided shall include: species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green roof. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2, and CC3 of the London Borough of Camden Local Plan 2017.

- 30 Air quality monitoring should be implemented on site. No development shall take place until full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the Greater London Authority's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance and have been in place for 3 months prior to the proposed implementation date. The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1, CC1, CC2 and CC3 of the Camden Local Plan 2017.

- 31 Prior to occupation of the development, full details of the mechanical ventilation system including air inlet locations and details of NO_x filters (where necessary) shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the boiler stack and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with policies A1, CC1, CC2 and CC3 of the Camden Local Plan 2017.

- 32 Sustainable urban drainage:

A) Prior to commencement of development details of a sustainable urban drainage system shall be submitted to and approved in writing by the local planning authority. Such system shall be designed to accommodate all storms up to and including a 1:100 year storm with a 30% provision for climate change, and shall demonstrate that greenfield run off rates (5l/s) will be achieved (unless otherwise agreed). The system shall include green and brown roofs and below ground attenuation, as stated in the approved drawings.

B) Prior to occupation of the development, evidence that the sustainable drainage system has been implemented in accordance with the approved details shall be submitted to the local planning authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC1, CC2 and CC3 of the Camden Local Plan June 2017.

Informative(s):

- 1 You are advised that this proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as the additional floorspace exceeds 100sqm GIA or one unit of residential accommodation.

- 2 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
- 3 Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.
- 4 You are advised that the appropriate standards for tree work are set out in BS 3998: 2010. Failure to ensure that the proposed works are carried out to these standards may result in damage to the tree(s) and may result in legal action by the Council.
- 5 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
- 6 You are advised that Section 44 of the Deregulation Act 2015 [which amended the Greater London Council (General Powers) Act 1973]] only permits short term letting of residential premises in London for up to 90 days per calendar year. The person who provides the accommodation must be liable for council tax in respect of the premises, ensuring that the relaxation applies to residential, and not commercial, premises.
- 7 Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
- 8 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.

Appendix 1 - Addendum 11th October by BPS

Stephenson House, Hampstead Road NW1 2PL



Application no. 2017/3518/P

Addendum 11th October 2017

BPS Chartered Surveyors have prepared an independent viability review on behalf of London Borough of Camden dated 12th September 2016.

We met with Gerald Eve, the Applicant's viability consultants, and the Council on 22nd September to discuss the areas of difference in opinion. Since then we have had further discussions regarding the viability position of the scheme. We summarise as follows:

Site Benchmark

We confirm that we are now agreed on the Benchmark Land Value of £87,700,000 which is based on the Existing Use Value of the property.

Commercial Values

We have been unable to agree on the overall commercial (office) rents for the Ground to 7th Floor and the overall capitalisation yield for the commercial element of the property (excluding ground rents). Given the proportion of the proposed offices the differences have a fundamental impact on the viability of the scheme.

Gerald Eve had proposed an overall rent of £63.87psf and Crossland Otter Hunt, on behalf of BPS, have maintained their position that the overall rent would be £70psf.

GE proposed that the overall yield should be in order of 4.5%, COH had assumed a yield of 4.25%

Based on the above assumptions, GE arrived at a valuation of circa £1,309psf compared to the COH valuation equating to £1,526psf.

We have run a number of sensitivities showing the impact of the adjustment in rents and yields as set out below:

Office Rent £psf	Yield	Office Value £psf
£67.50	4.25%	£1,472
£67.50	4.375%	£1,426
£70.00	4.25%	£1,526

It is clear that there are very small margins of variation between BPS and GE valuation. A higher level accuracy would be difficult to attain at this stage. To progress the matter we have attempted to arrive at a compromise. COH maintain that £70psf is an appropriate rent and that the maximum compromise we are willing to consider is £67.50psf on the rental value and a mid-point on the yield at 4.375%. A rent below £67.50 would not be accepted by COH.

This equates to a capital value of £1,426psf which indicates that a viable scheme could be achieved at the agreed benchmark based upon 35% affordable housing.

Review

GE have agreed that the scheme can be considered viable but would not be able to support additional affordable housing contribution at this time. GE recognise, however, that if the achieved capital value for the office element exceeded their estimate of value, then the scheme would potentially be able to pay an additional payment in lieu up to policy target amount of approximately £1.3m.

We are of the view that a review mechanism should be included within the Section 106 agreement to ensure that actual cost and revenue generated from the scheme can be examined on completion and any surplus generated can be paid up to the c.£1.3m cap.

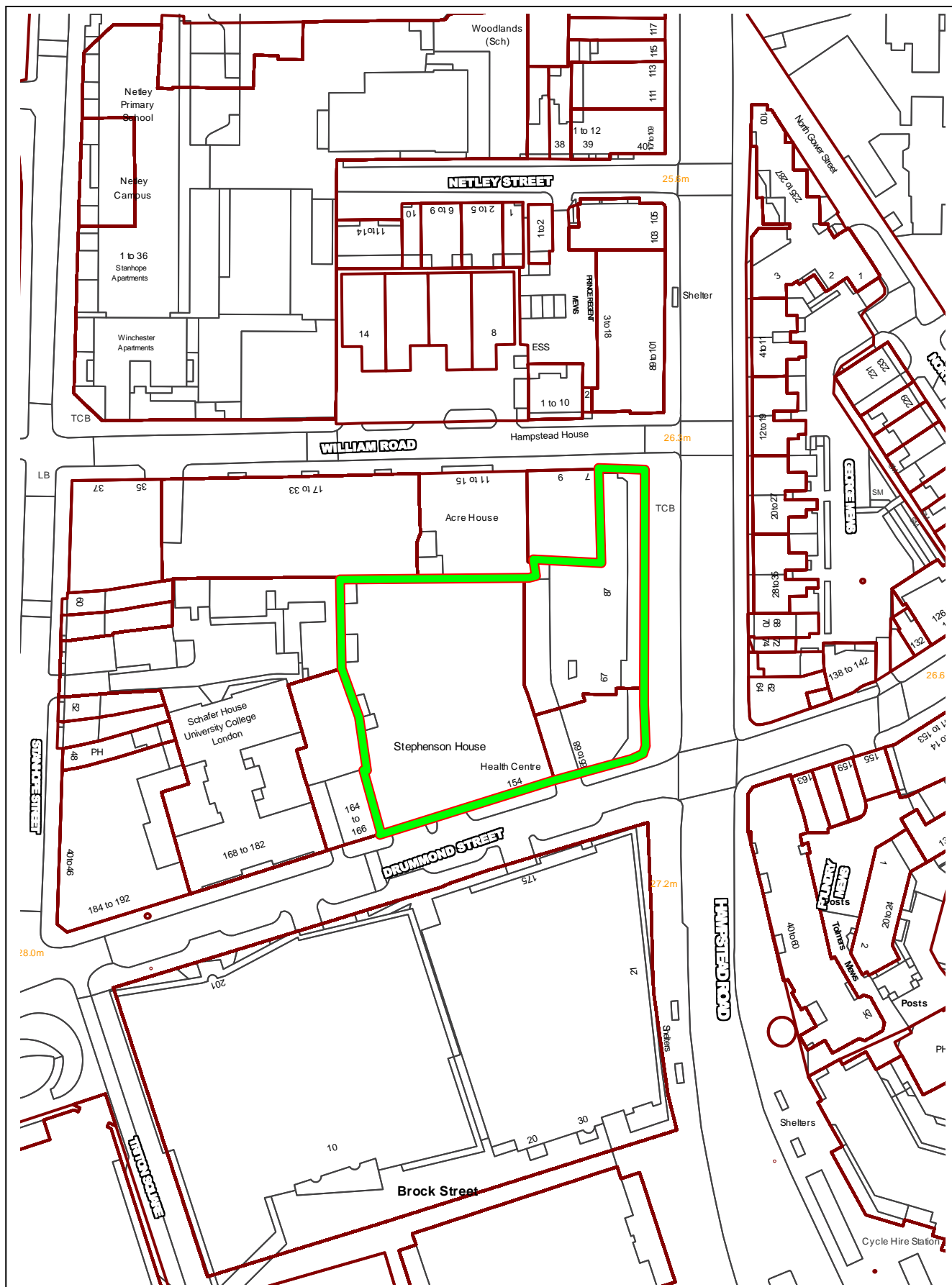
In addition, GE have advised that the Applicant would also be willing to convert the proposed 35% on site affordable housing to 100% London Affordable Rent to help better meet housing need (proposed at £175 psf), although it is recognised this is a deviation from Camden policy.

Therefore based upon the discussions had between the parties on behalf of the Applicant and Camden council it is understood that to progress matters in a reasonable manner the Applicant would be willing to present the following offer for Camden consideration:

- CIL of £538,197
- S106 contribution of £500,000 (subject to Heads of Terms).
- 6 on site affordable units - (35% of the residential element of the scheme);
- 100% of the affordable units to reflect London Affordable Rent; and
- A Review mechanism of the proposed scheme on completion to determine if any additional contribution by way of a payment in lieu can be achieved up to the policy PIL equivalent amount - estimated by BPS to be £1.3m.

BPS Chartered Surveyors

11th October 2017



Application No: 2017/3518/P

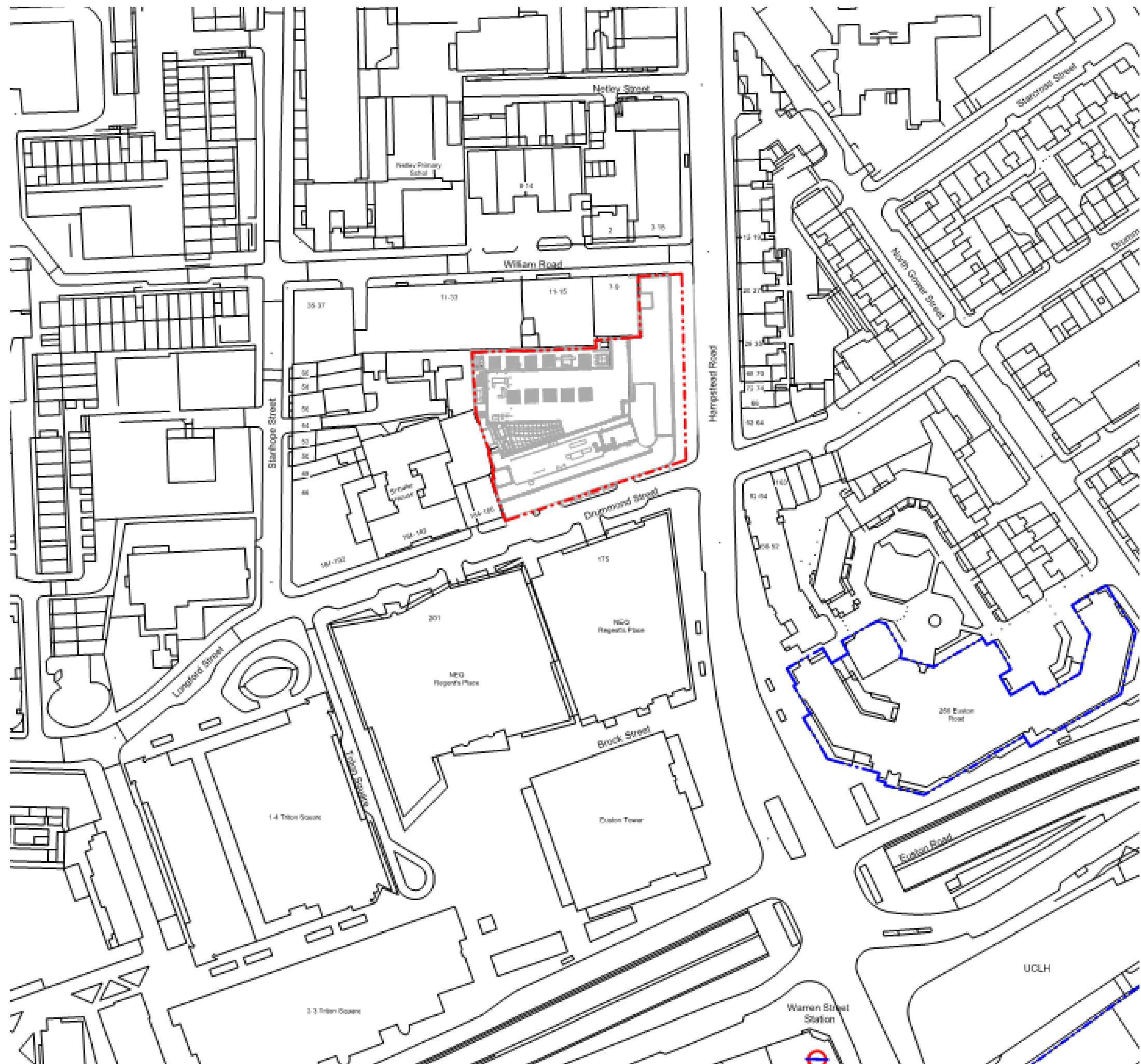
**Stephenson House, 75 Hampstead Road
London, NW1 2PL**

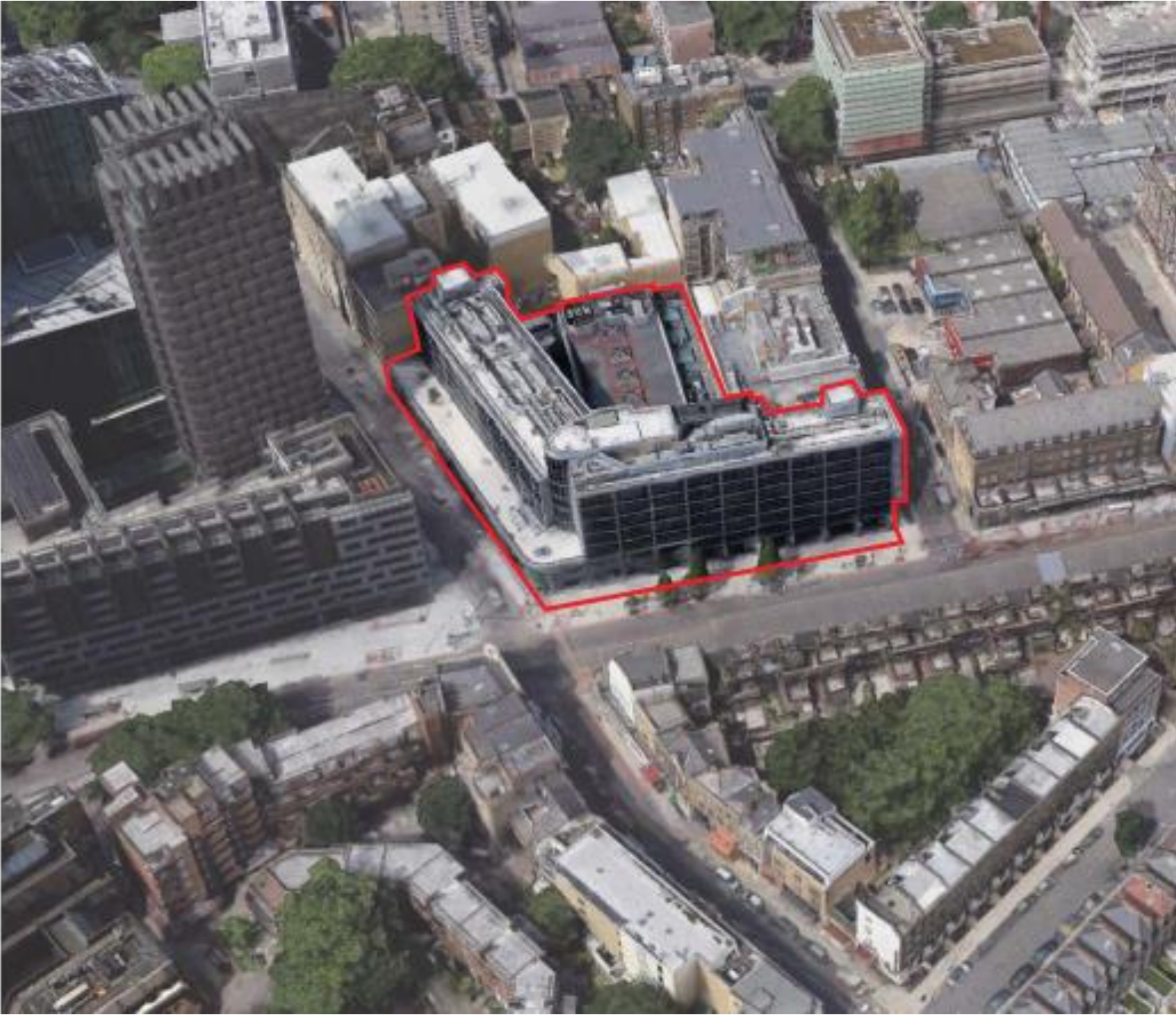
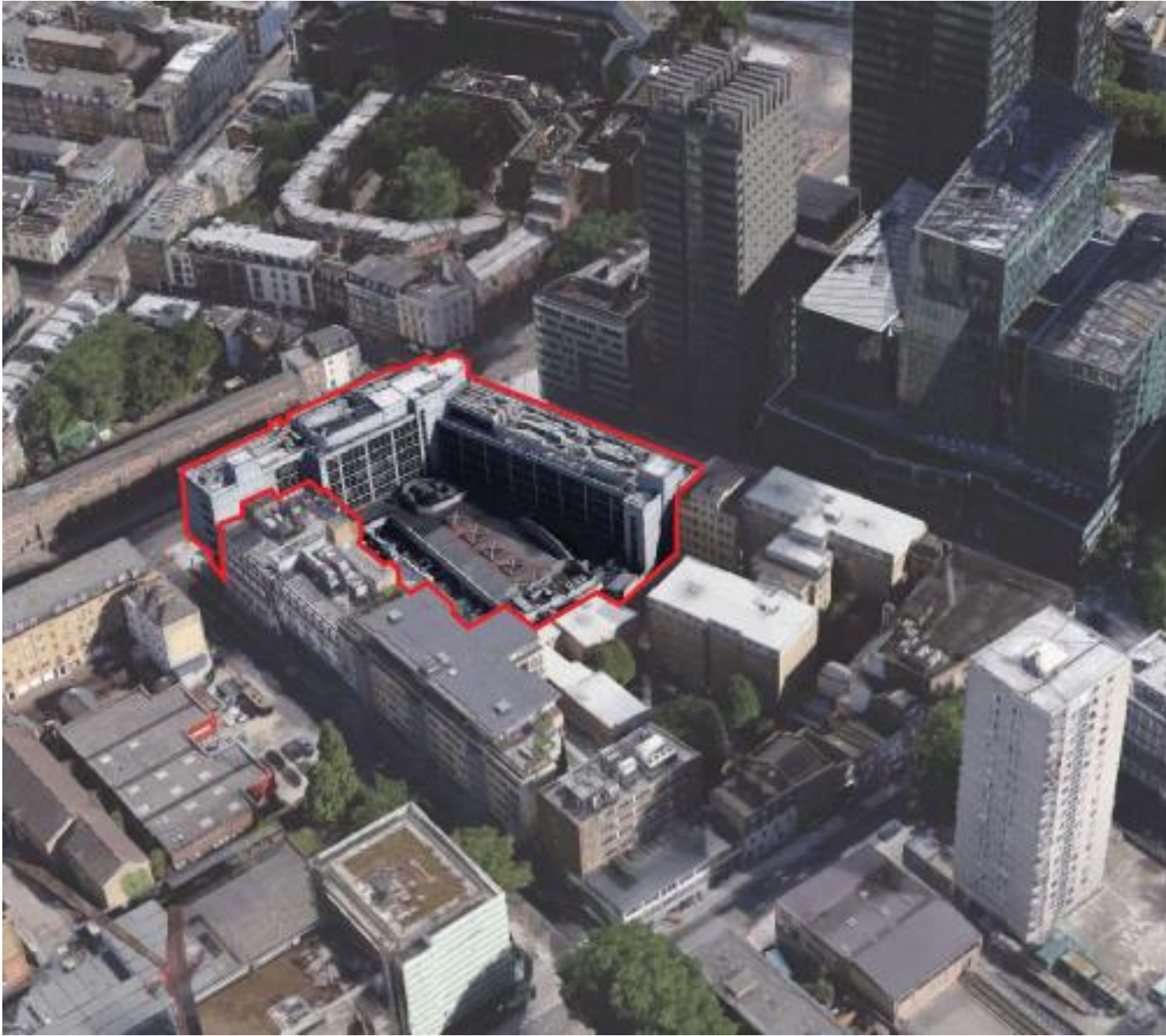
**Scale:
1:1250**

**Date:
13-Oct-17**



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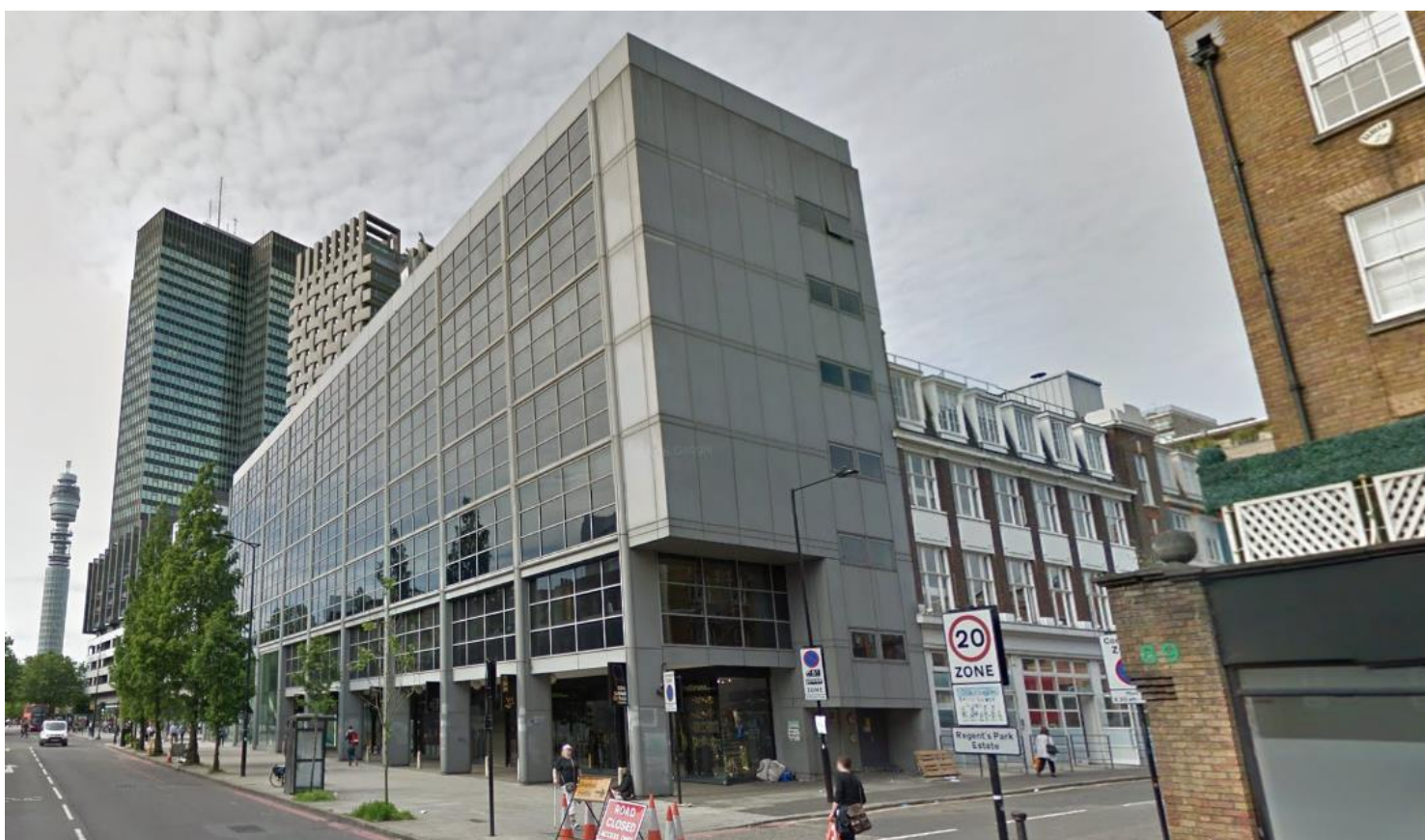
Above: Aerial views of Stephenson House



Left: Stephenson House from corner of Drummond Street and Hampstead Road

Below: Looking towards Stephenson House along Drummond Street

Below: Stephenson House from corner of William Road and Hampstead Road

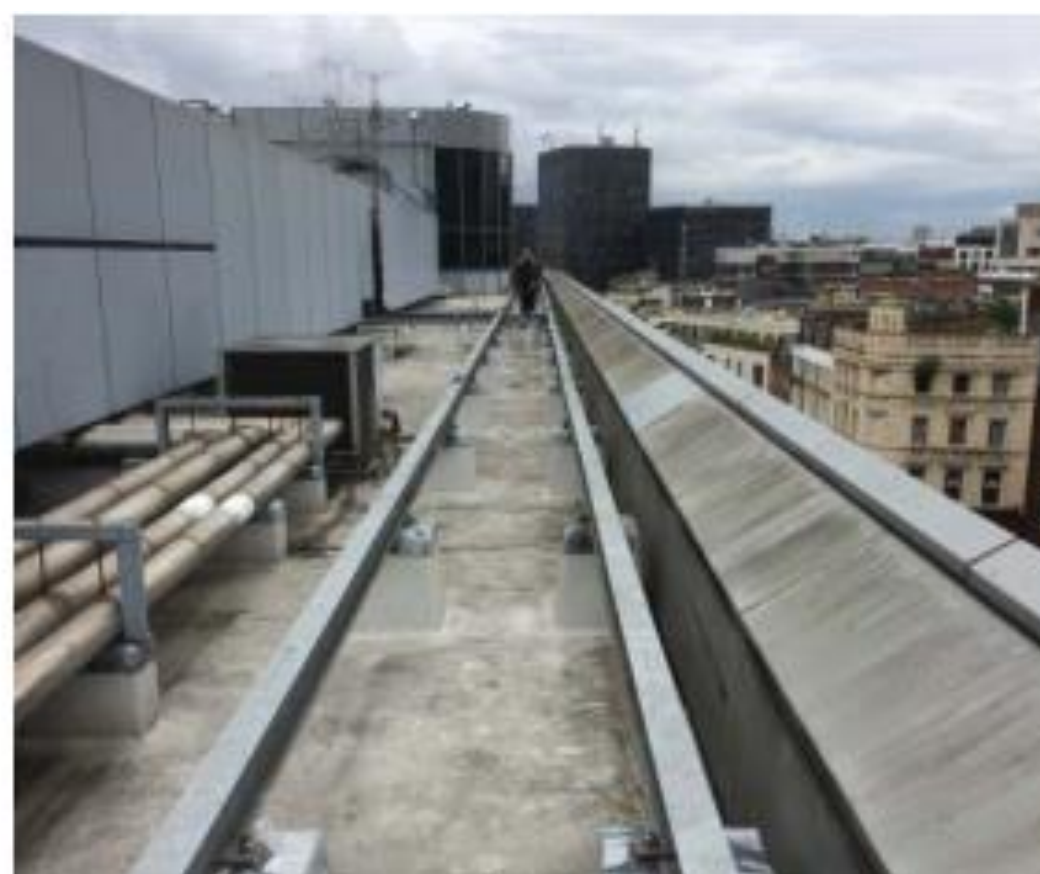




Above image: Visual link to Tottenham Court Road



Left: Roof and rear of the building

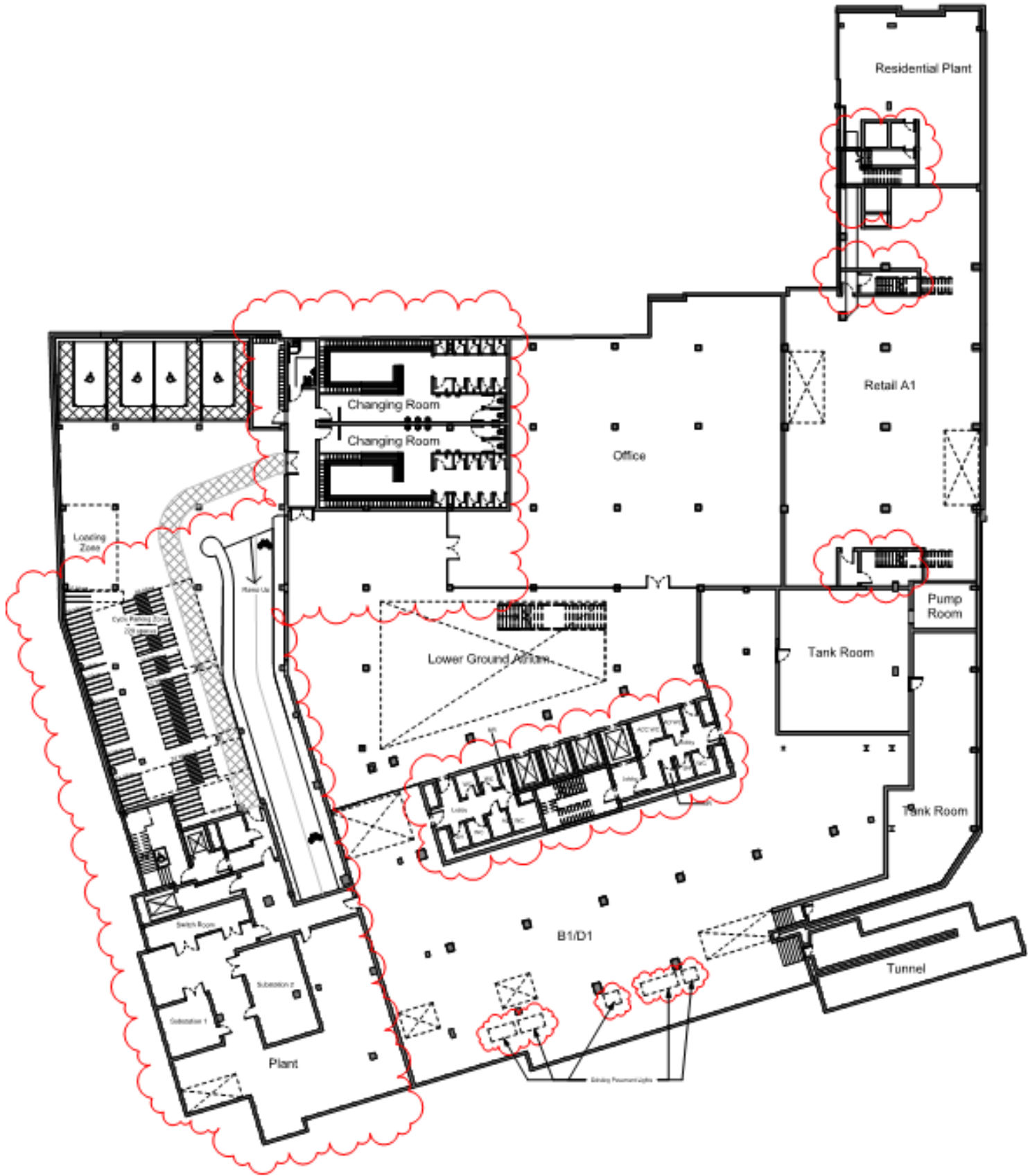




Above: Existing basement



Above: Existing basement plan



Above: Proposed basement plan



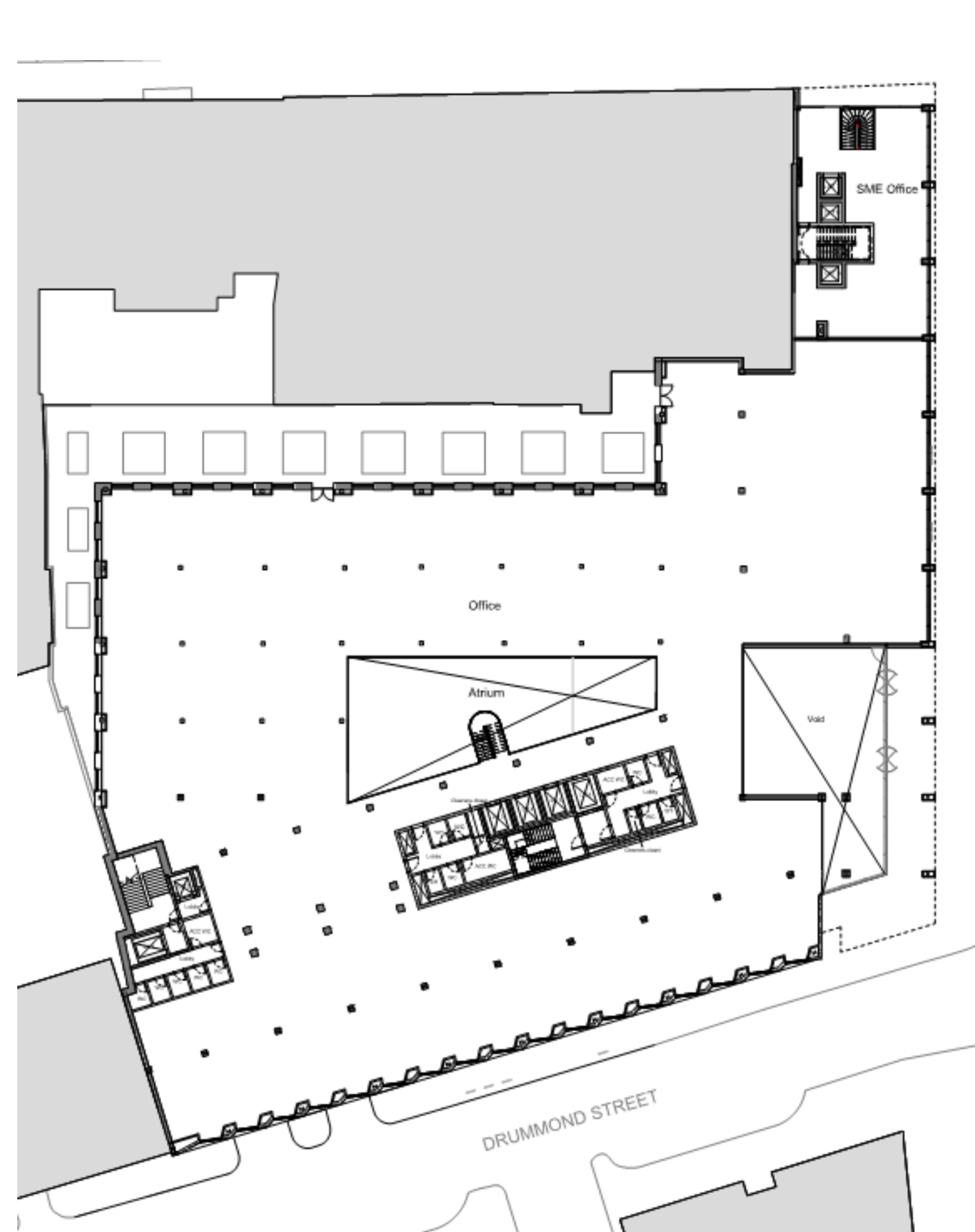
Above: Existing ground floor plan



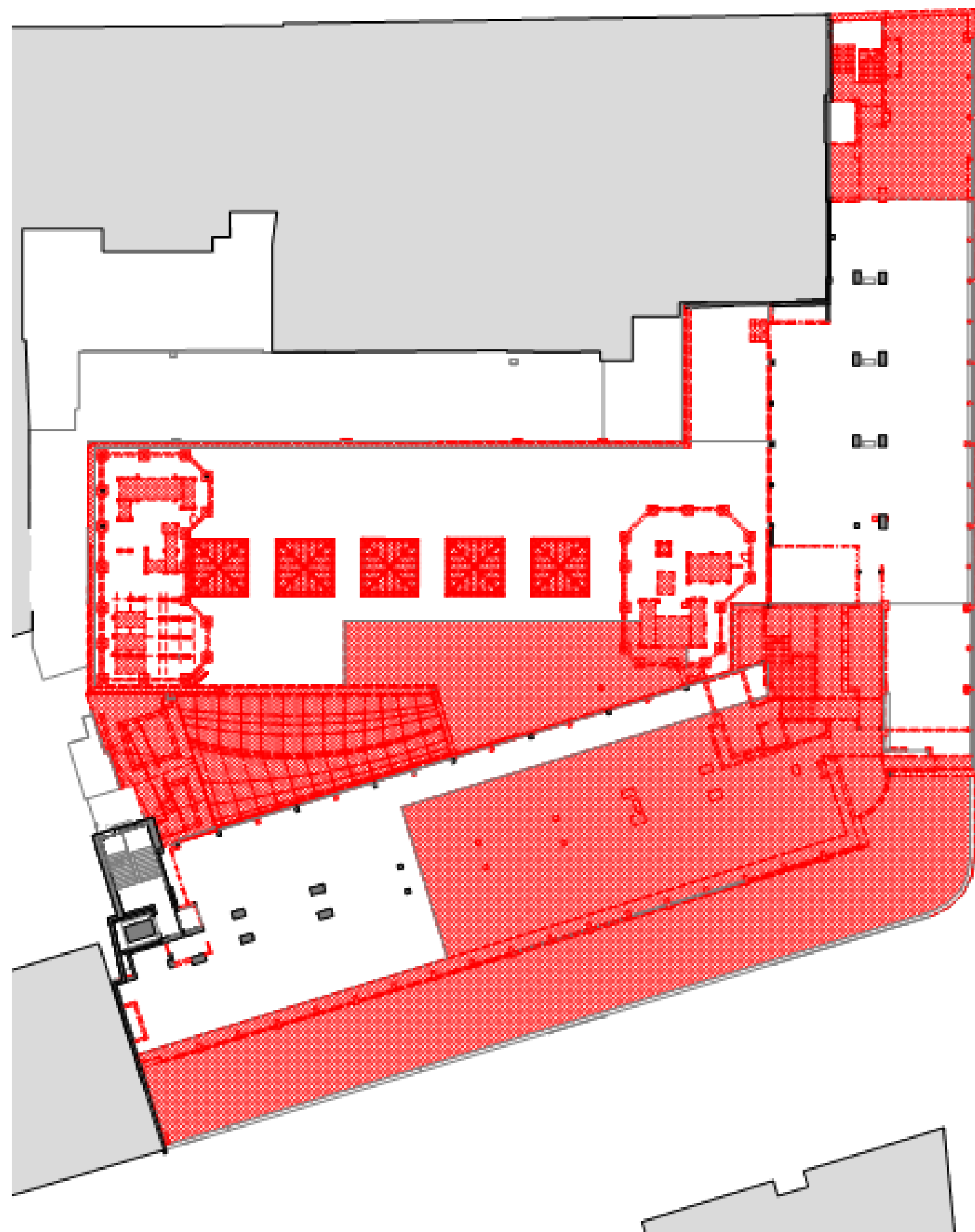
Above: Proposed ground floor plan



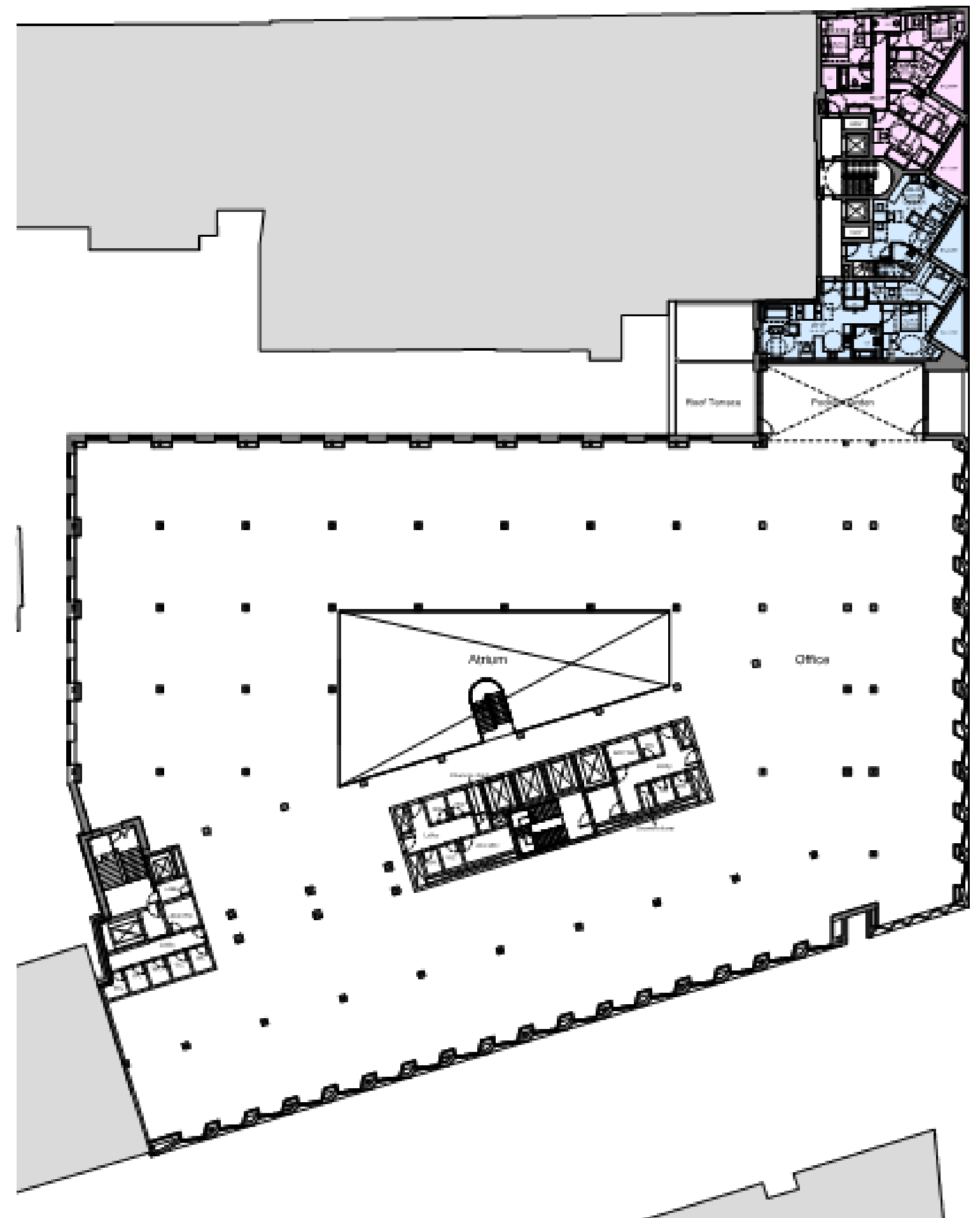
Above: Existing first floor plan



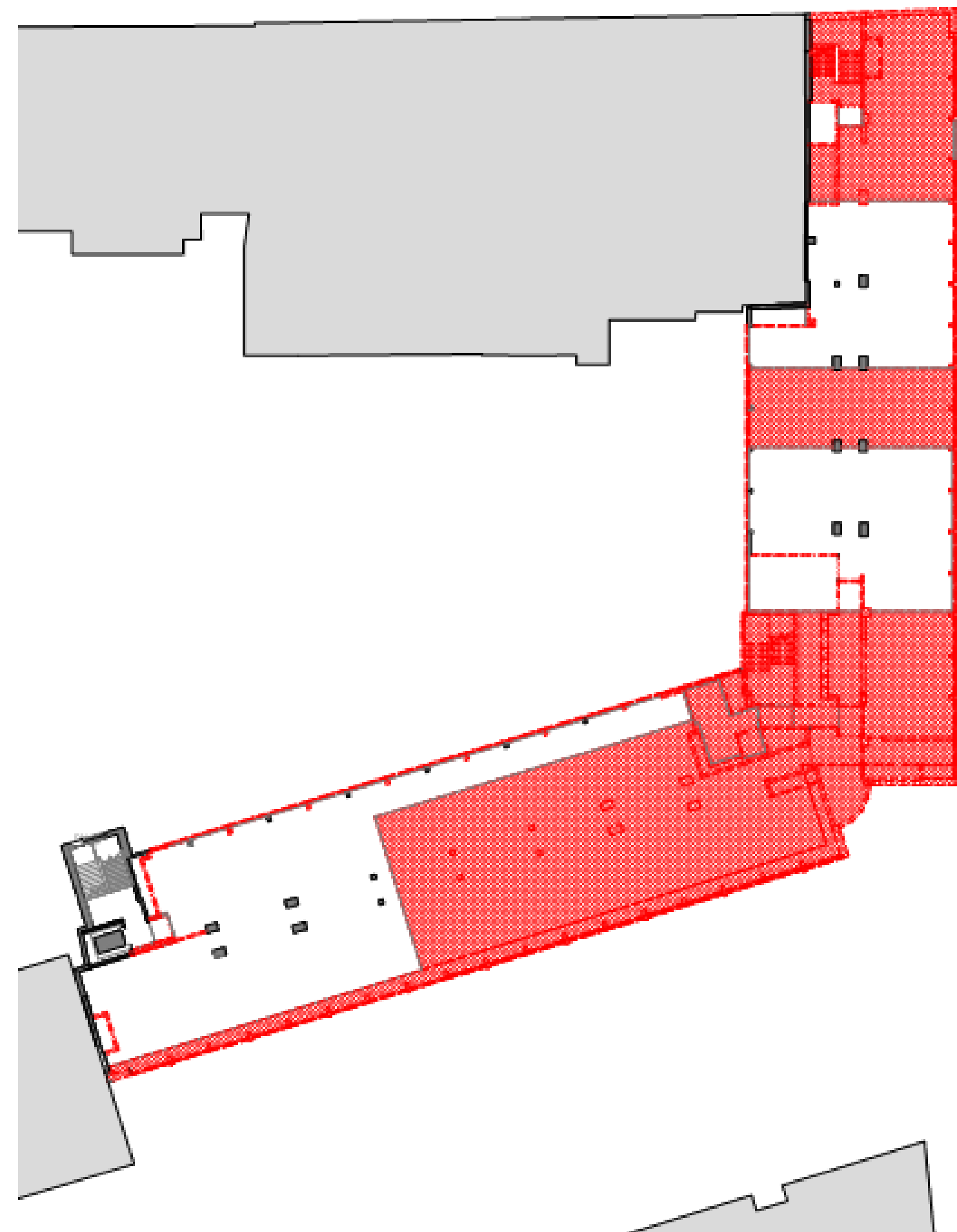
Above: Proposed first floor plan



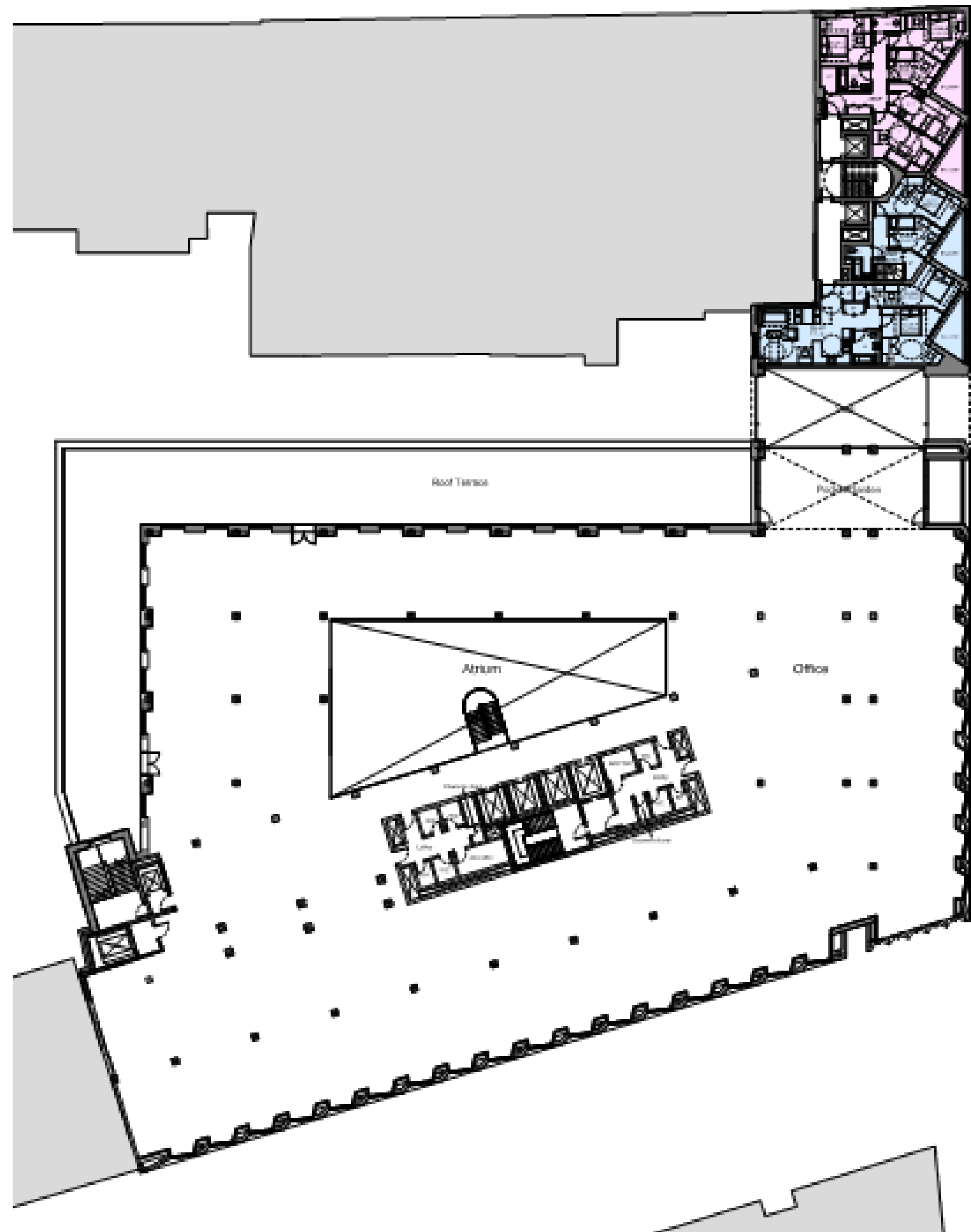
Above: Existing second floor plan



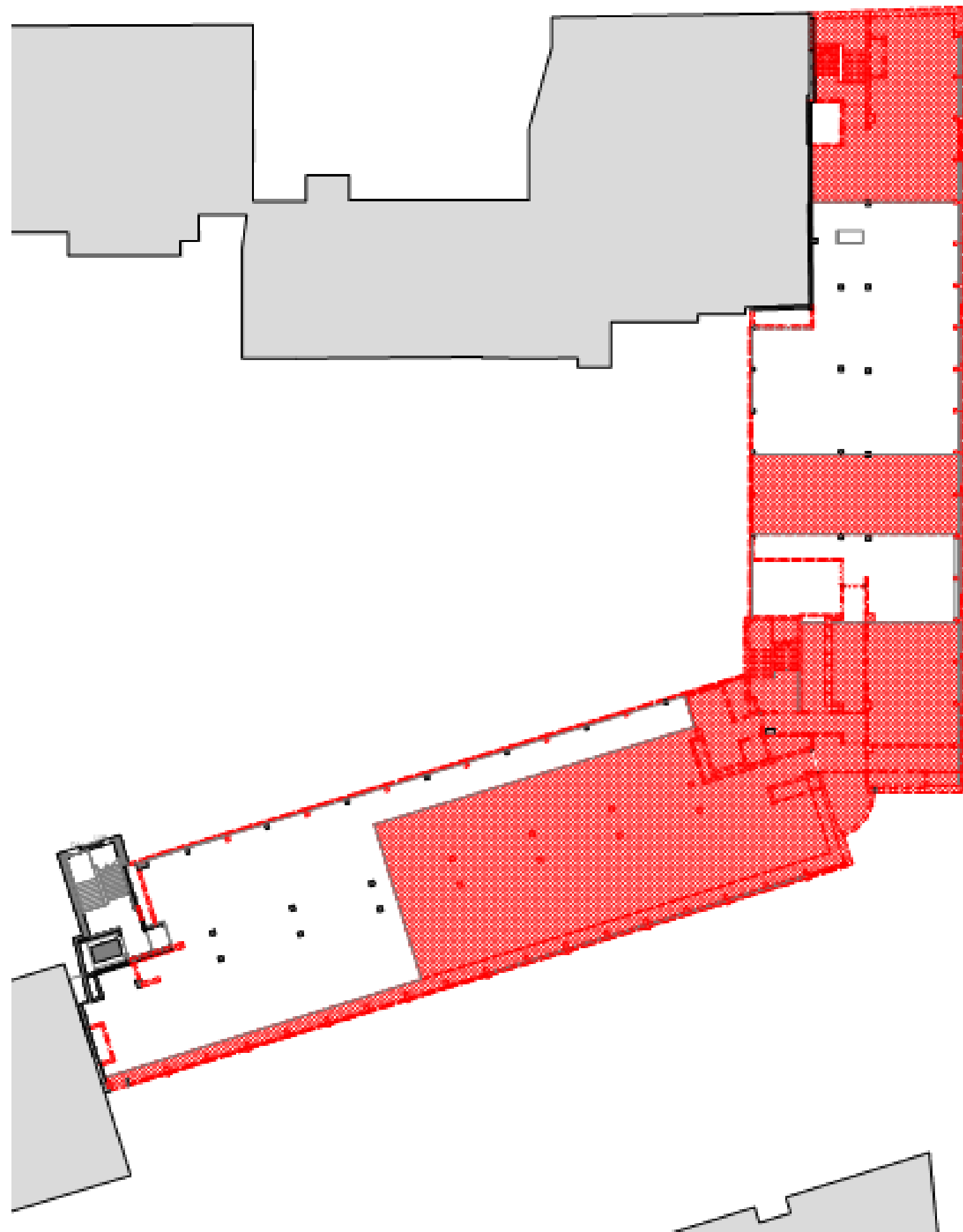
Above: Proposed second floor plan



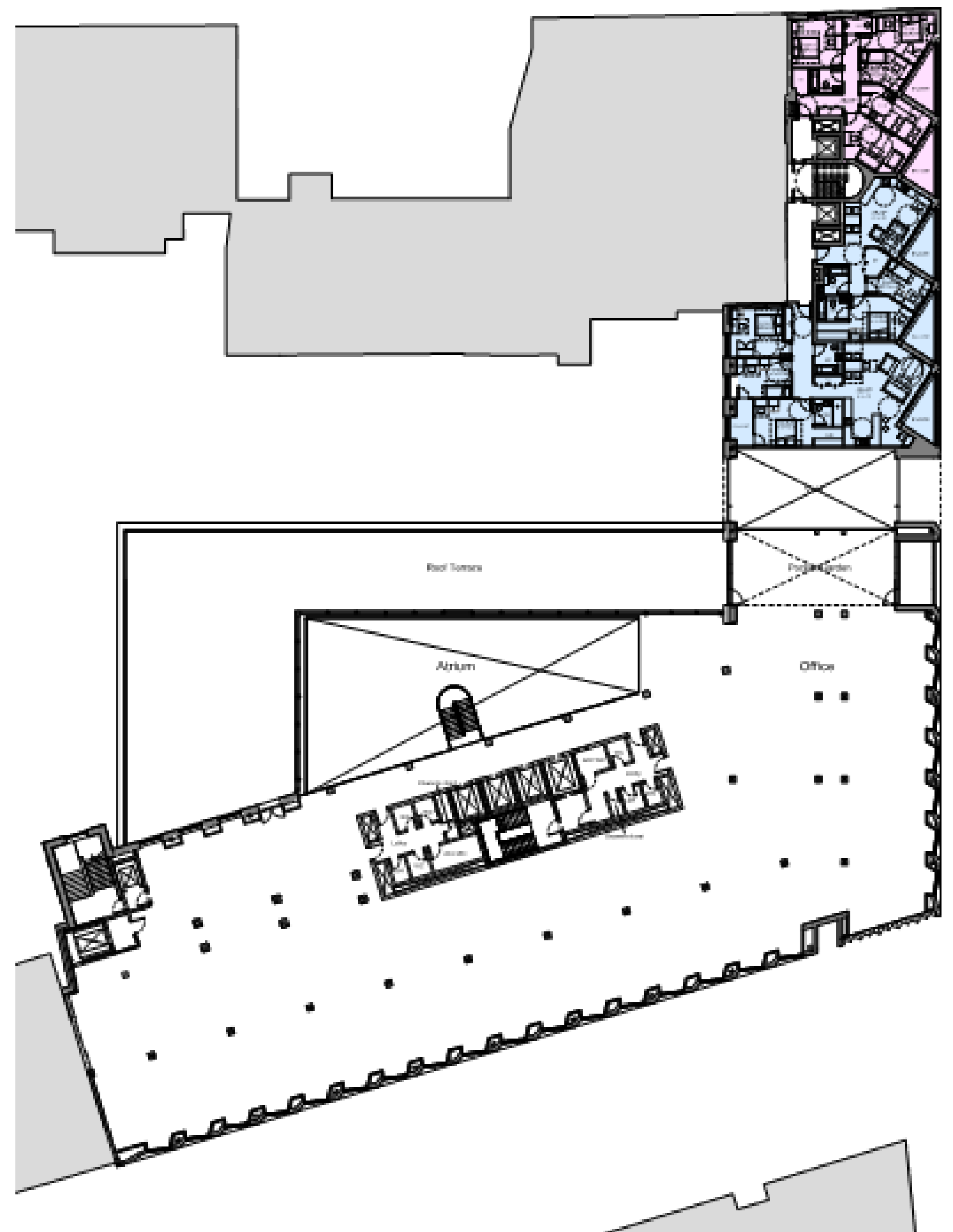
Above: Existing third floor plan



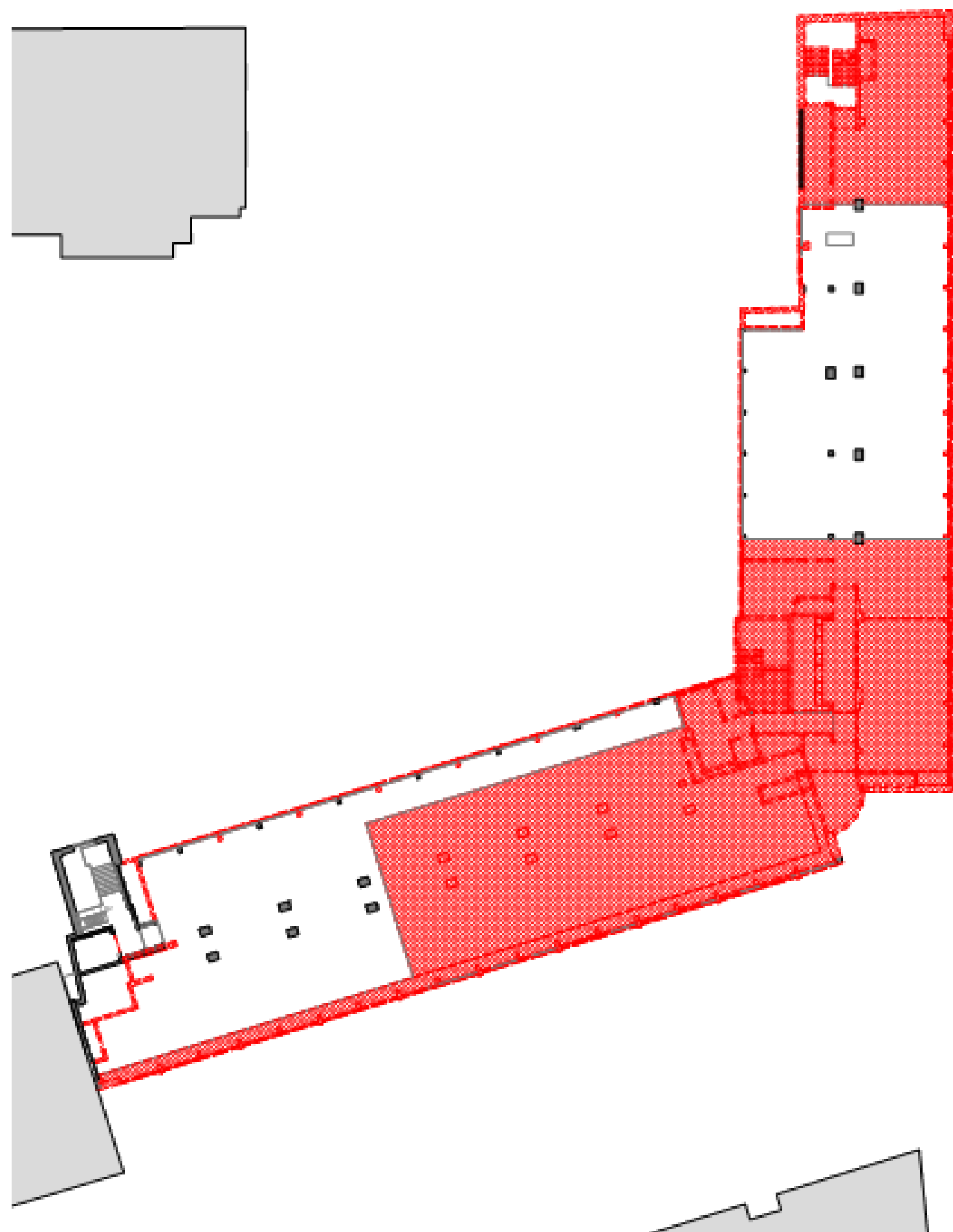
Above: Proposed third floor plan



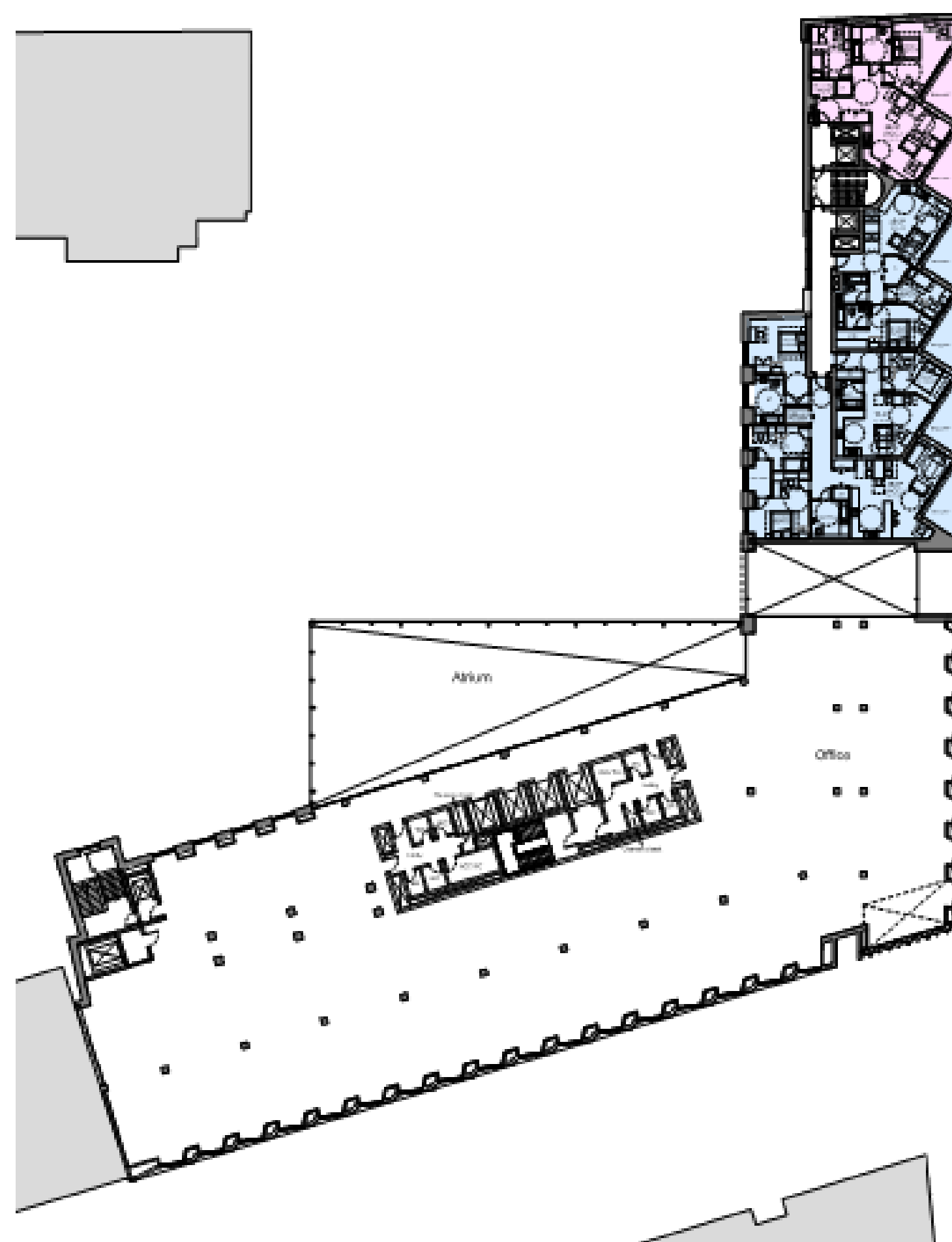
Above: Existing fourth floor plan



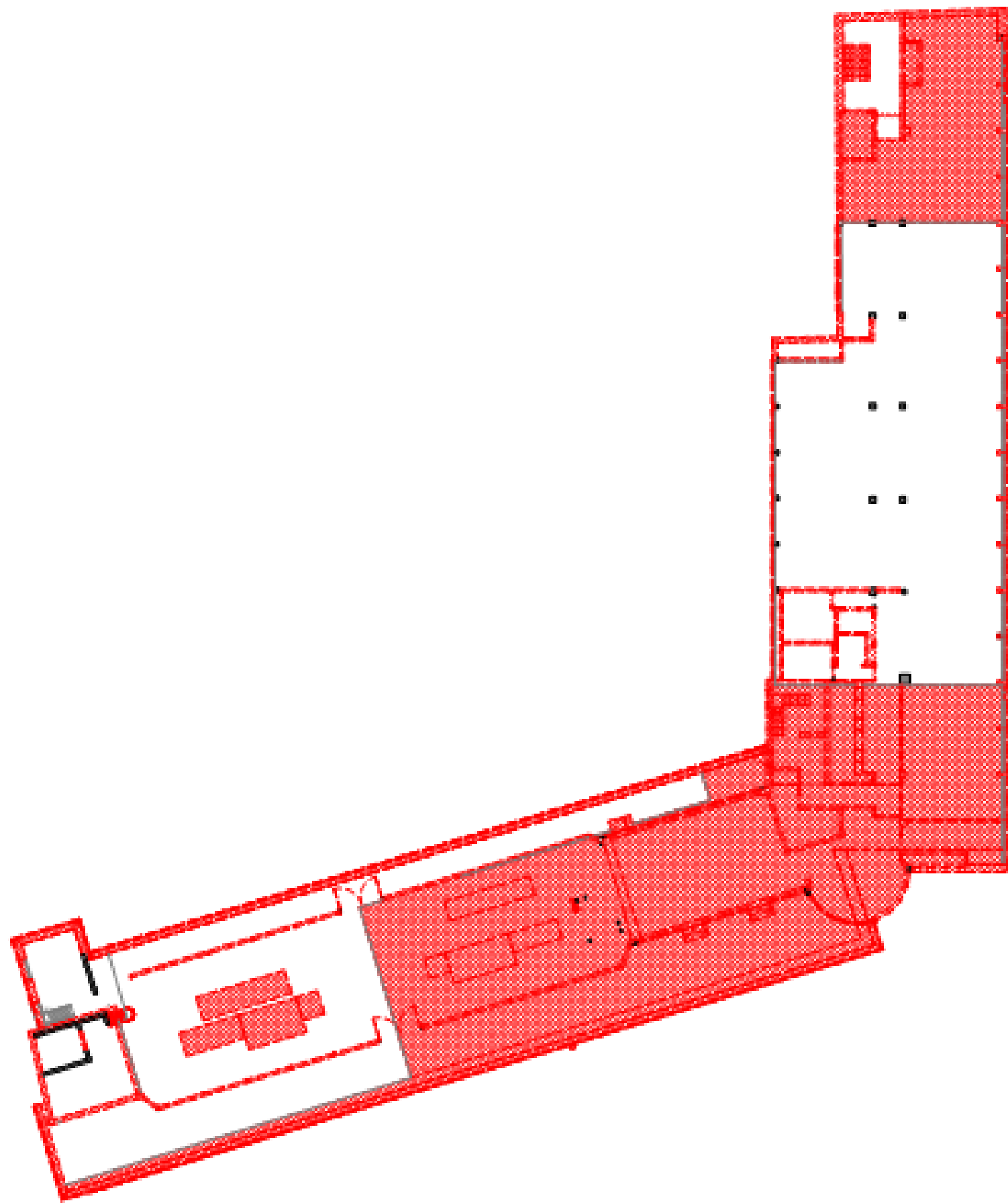
Above: Proposed fourth floor plan



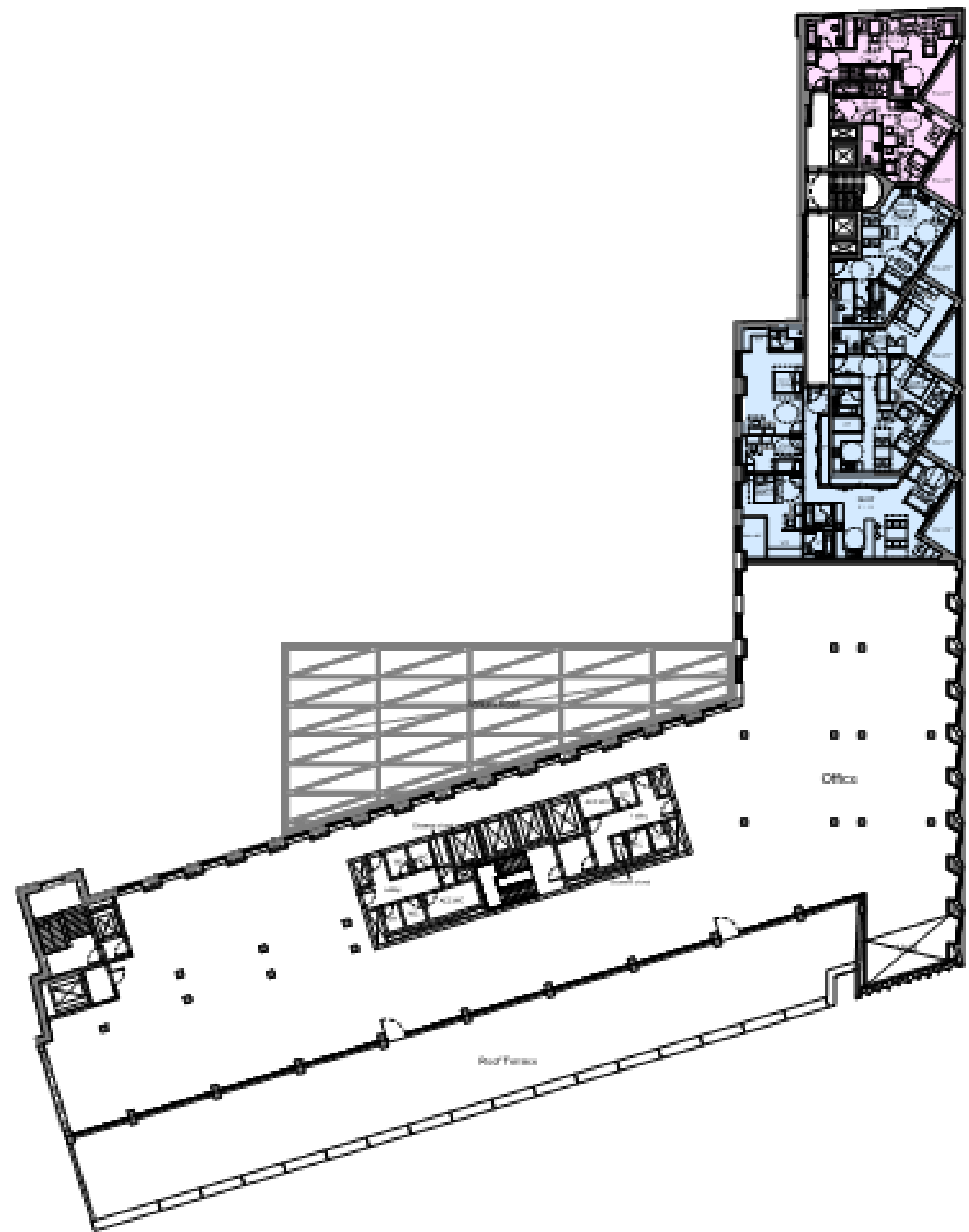
Above: Existing fifth floor plan



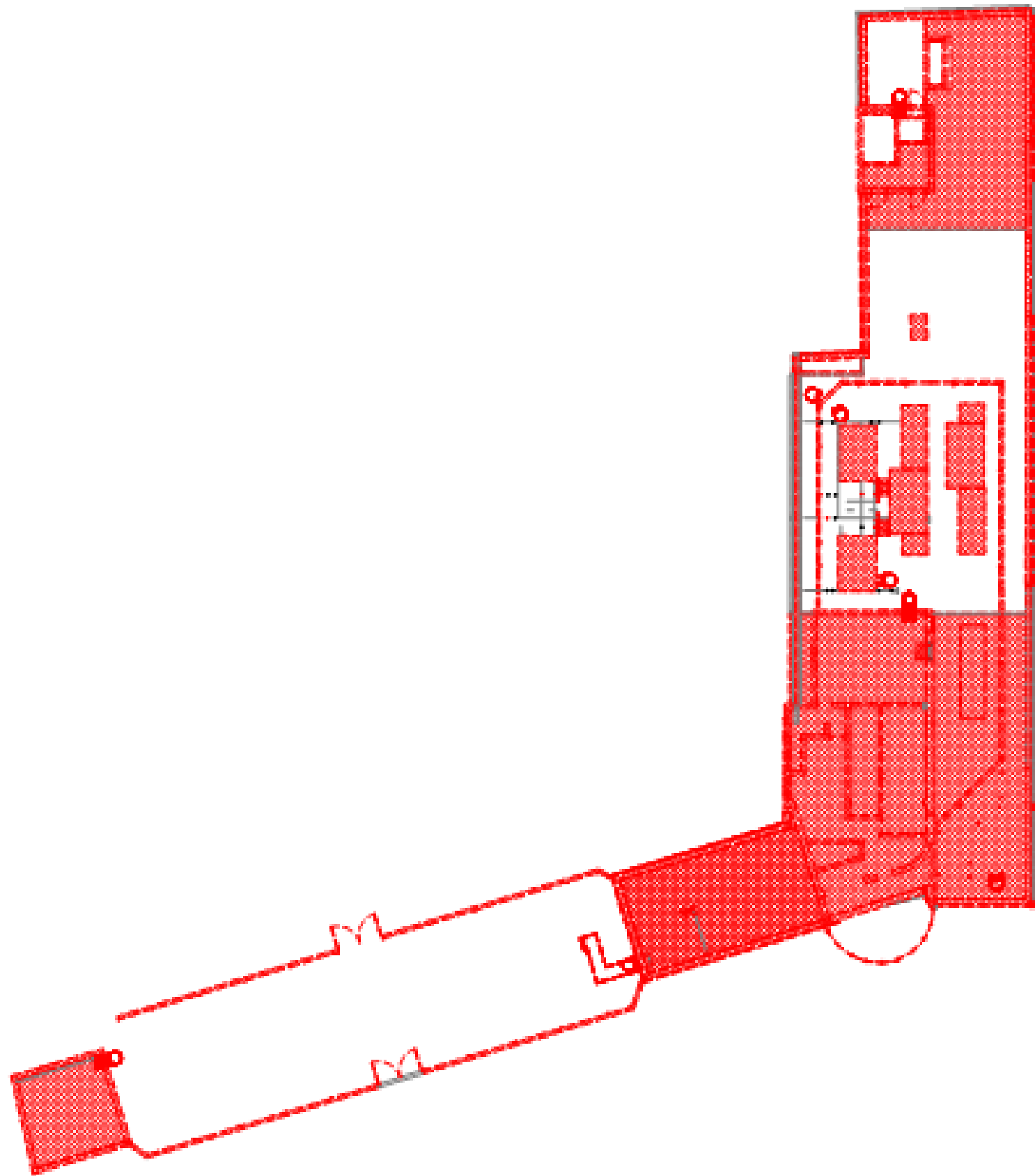
Above: Proposed fifth floor plan



Above: Existing sixth floor plan



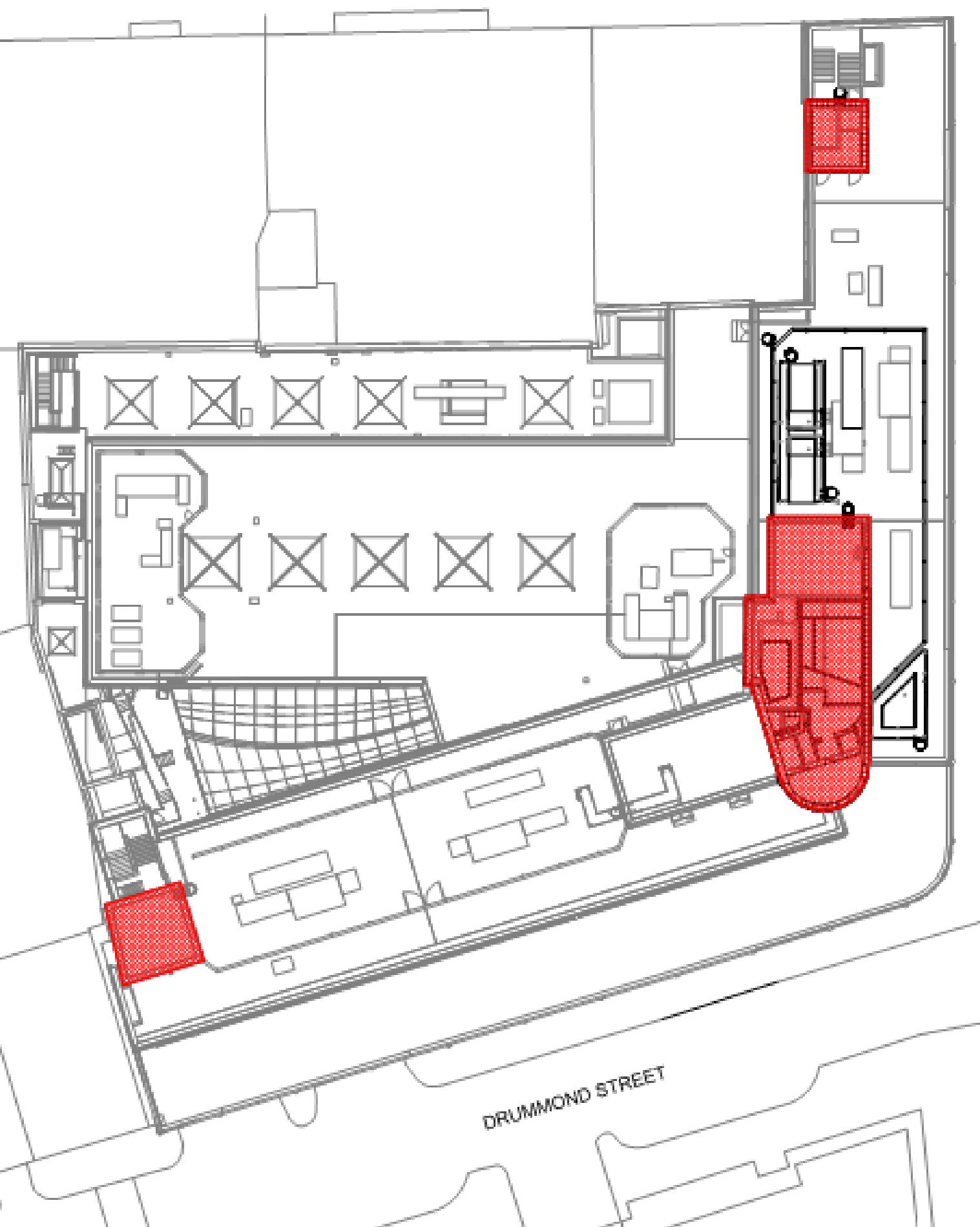
Above: Proposed sixth floor plan



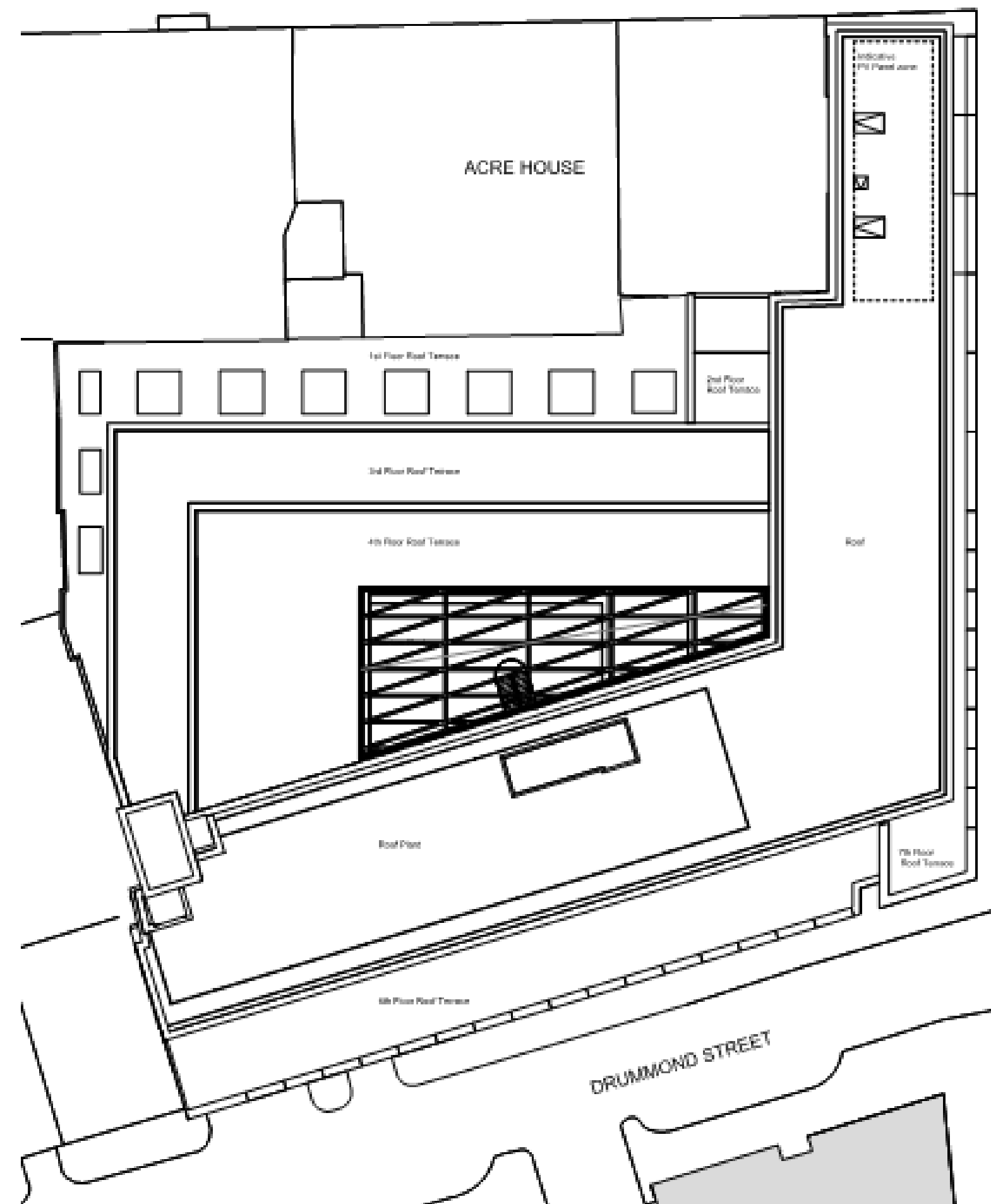
Above: Existing seventh floor plan



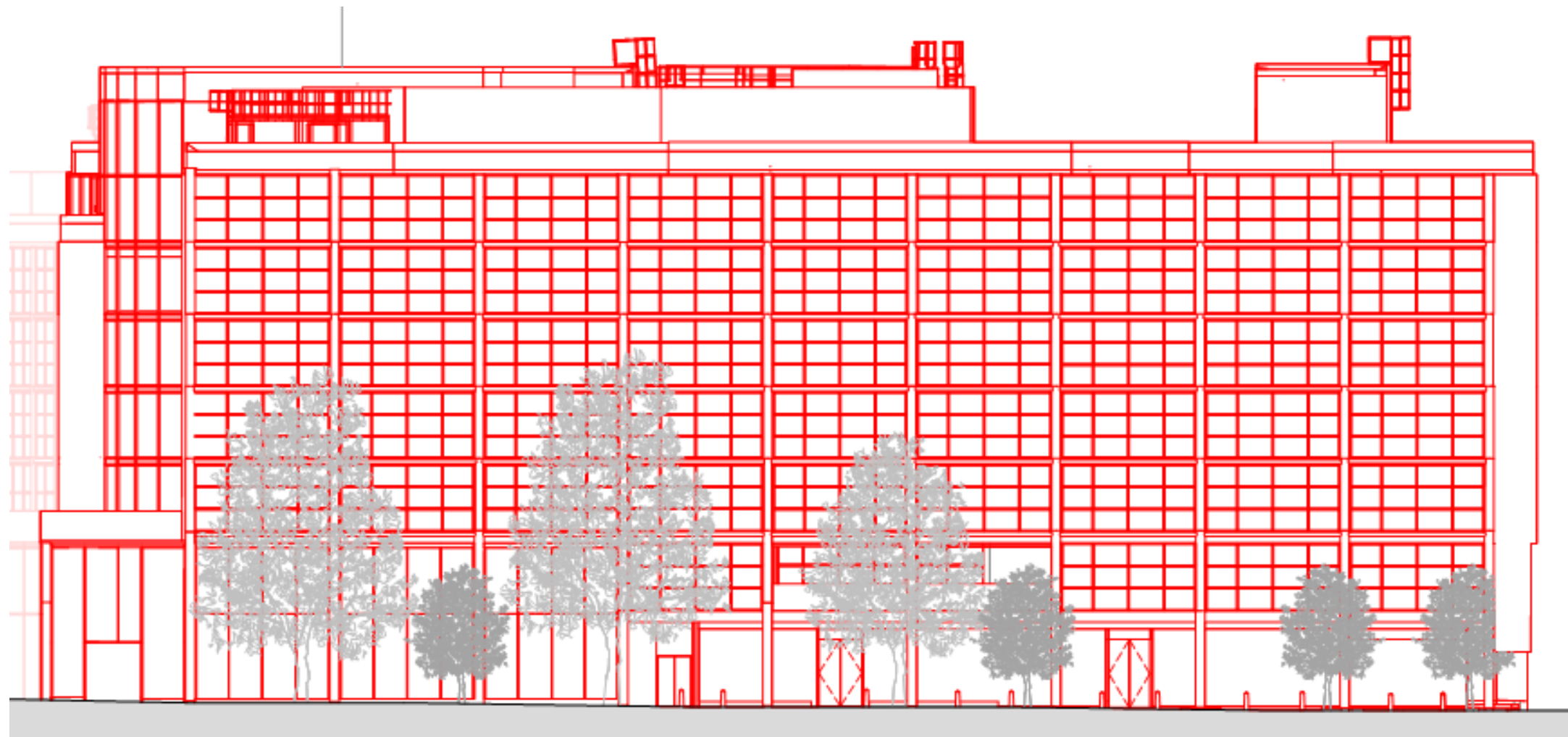
Above: Proposed seventh floor plan



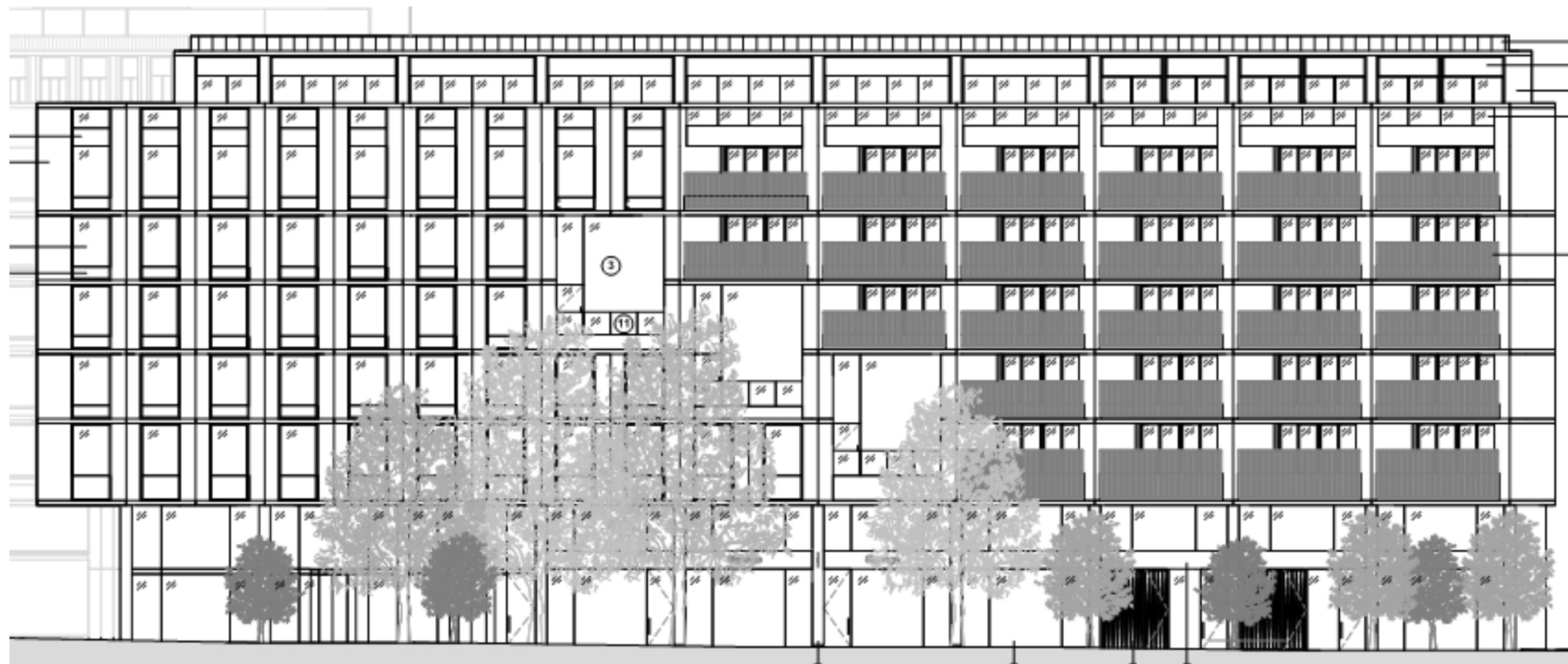
Above: Existing roof plan



Above: Proposed roof plan



Left: Existing Hampstead Road elevation

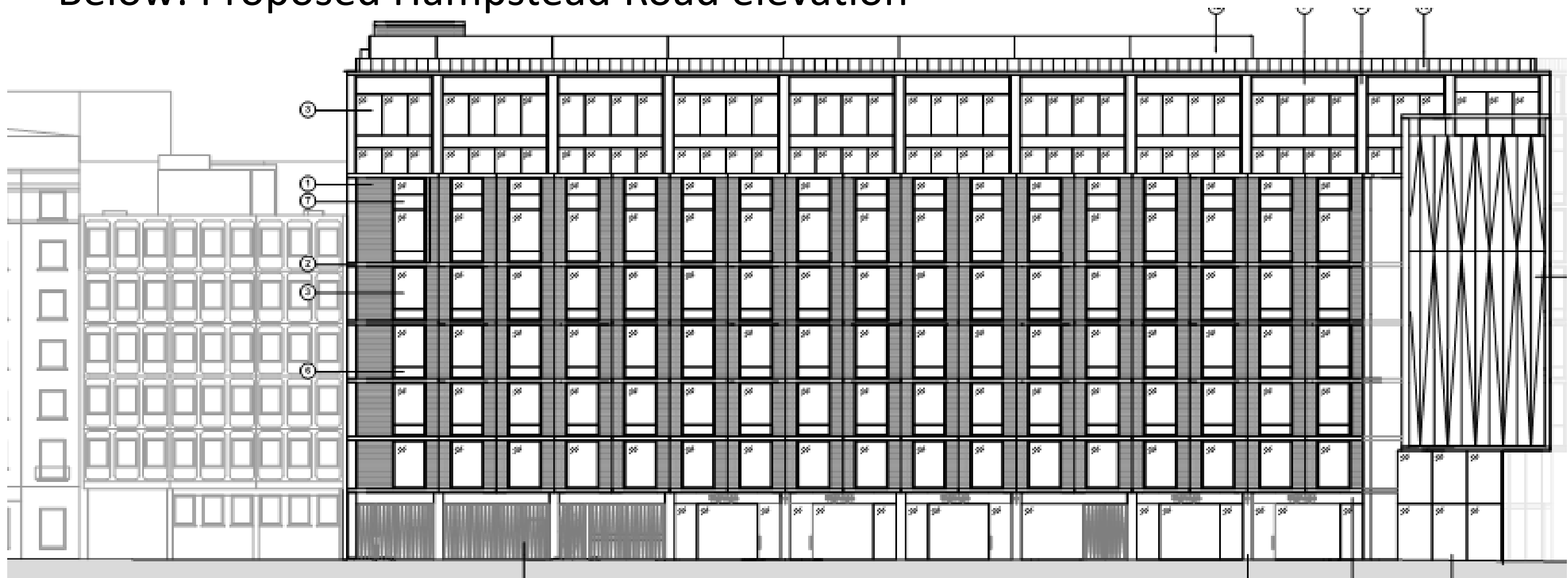


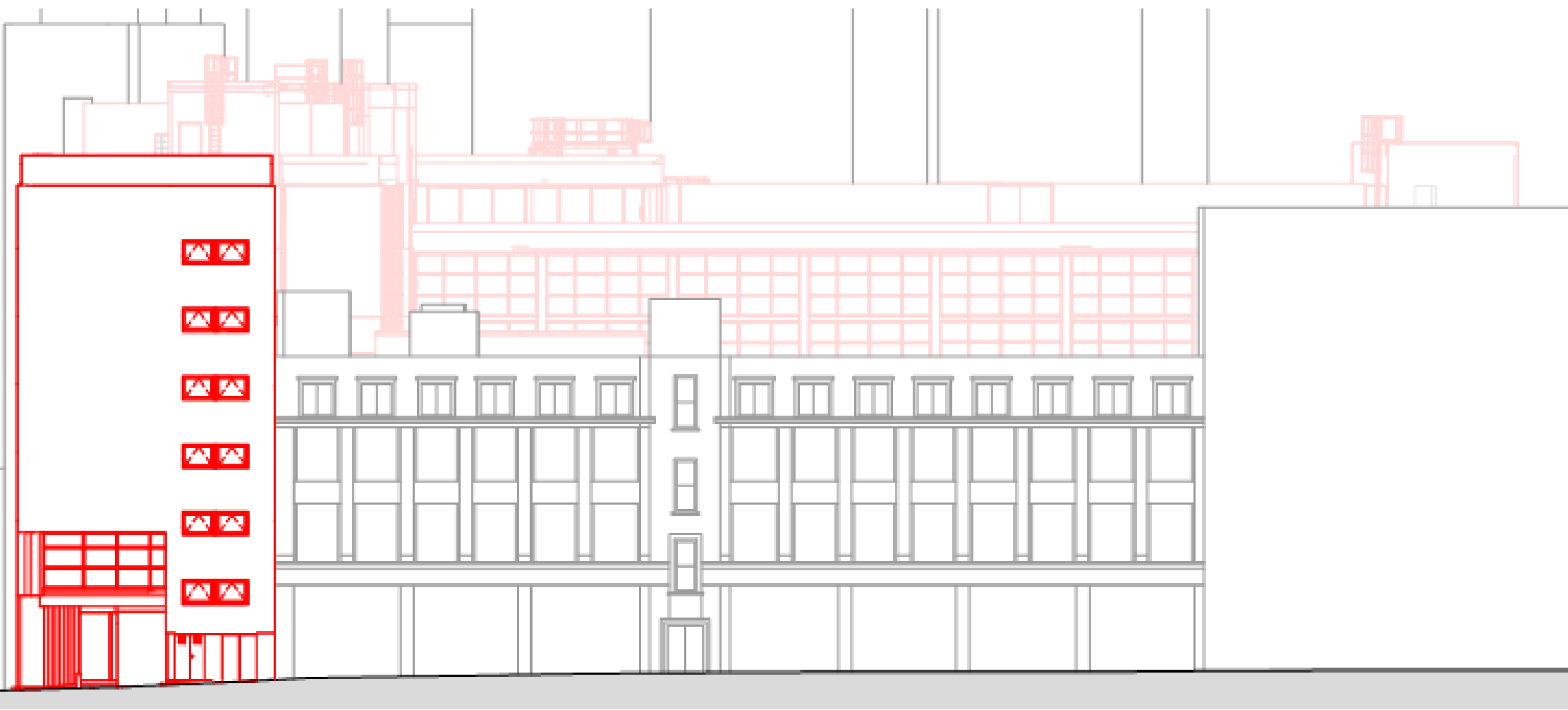
Left: Proposed Hampstead Road elevation

Below: Existing Drummond Street elevation



Below: Proposed Hampstead Road elevation

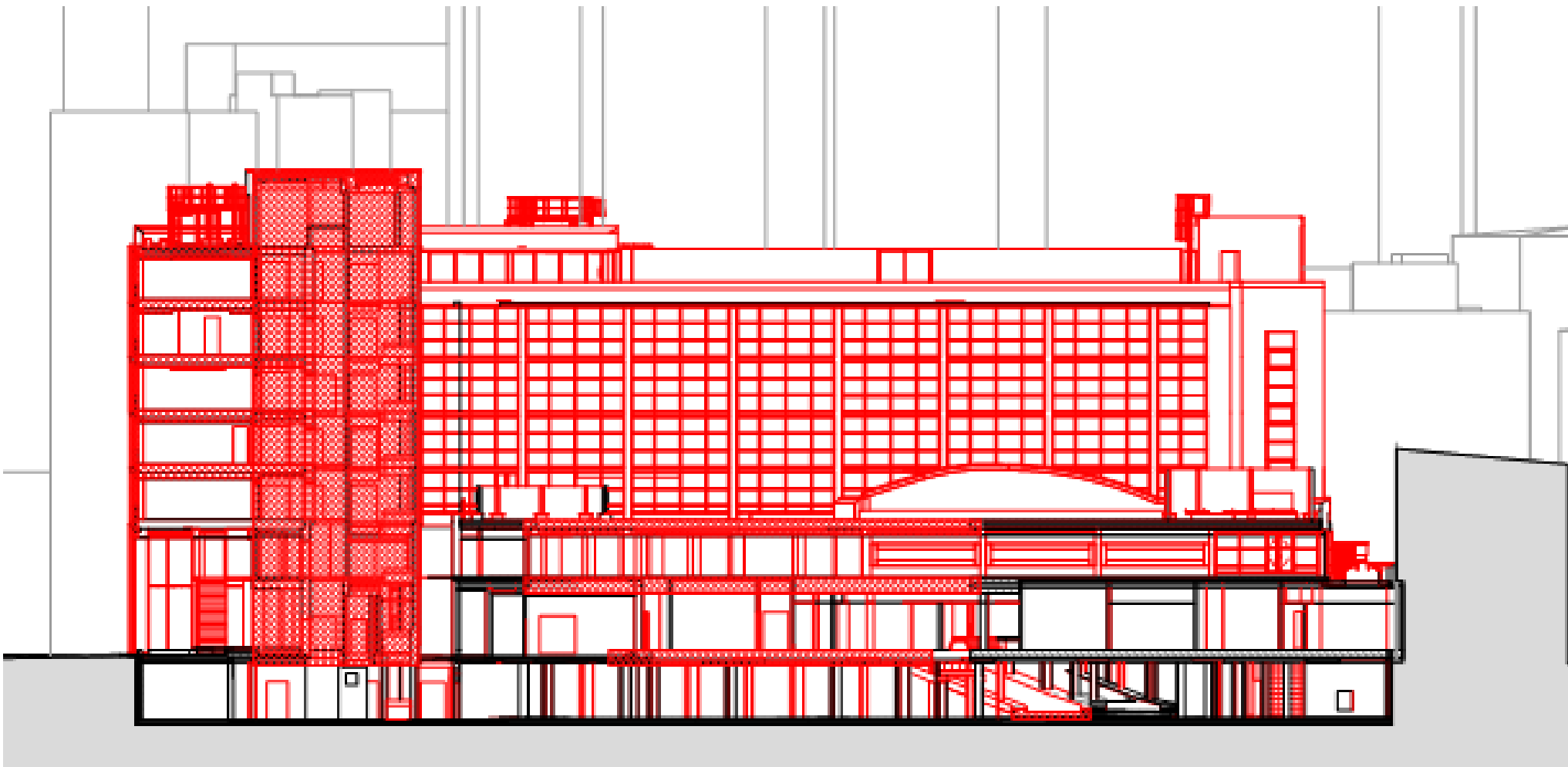




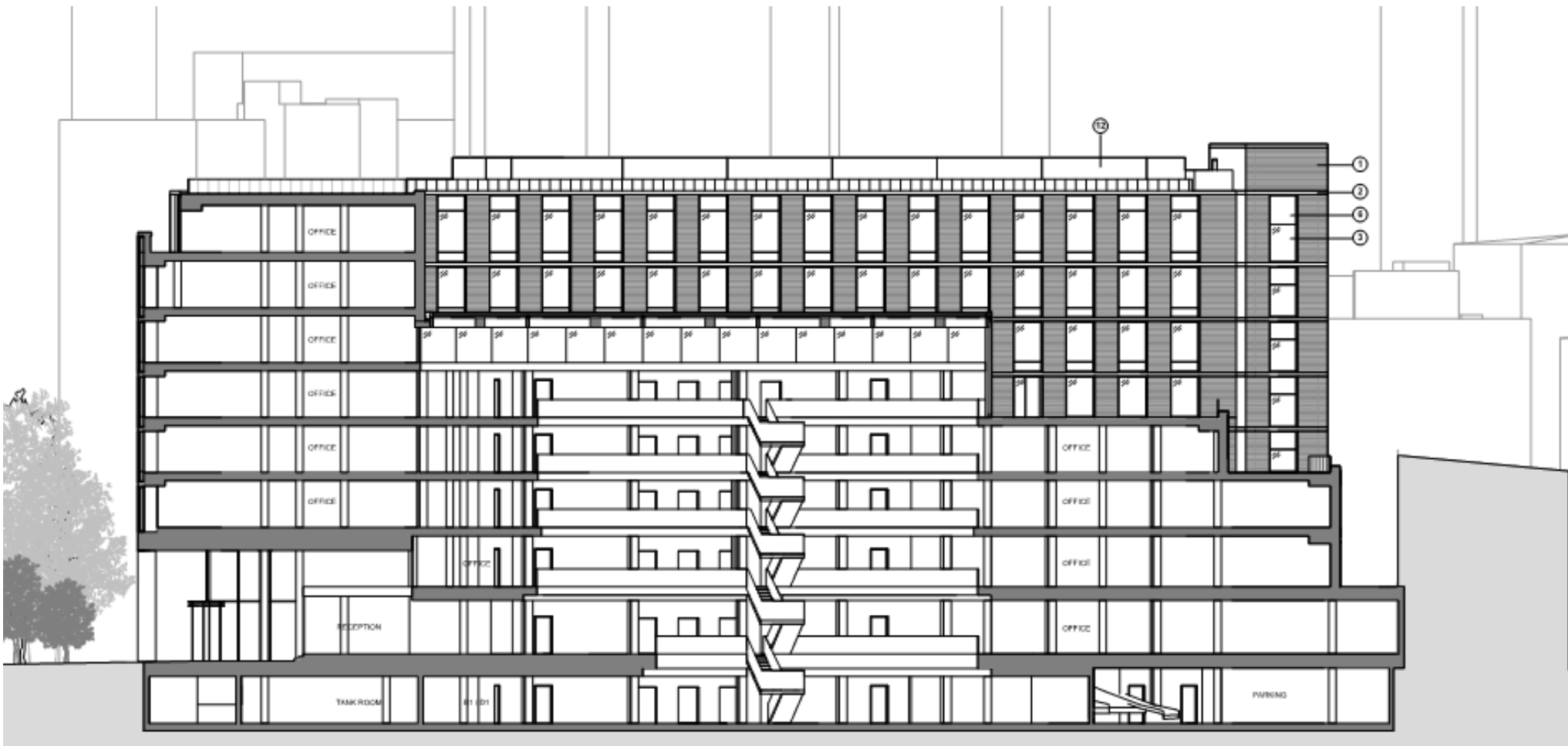
Left: Existing William Road elevation



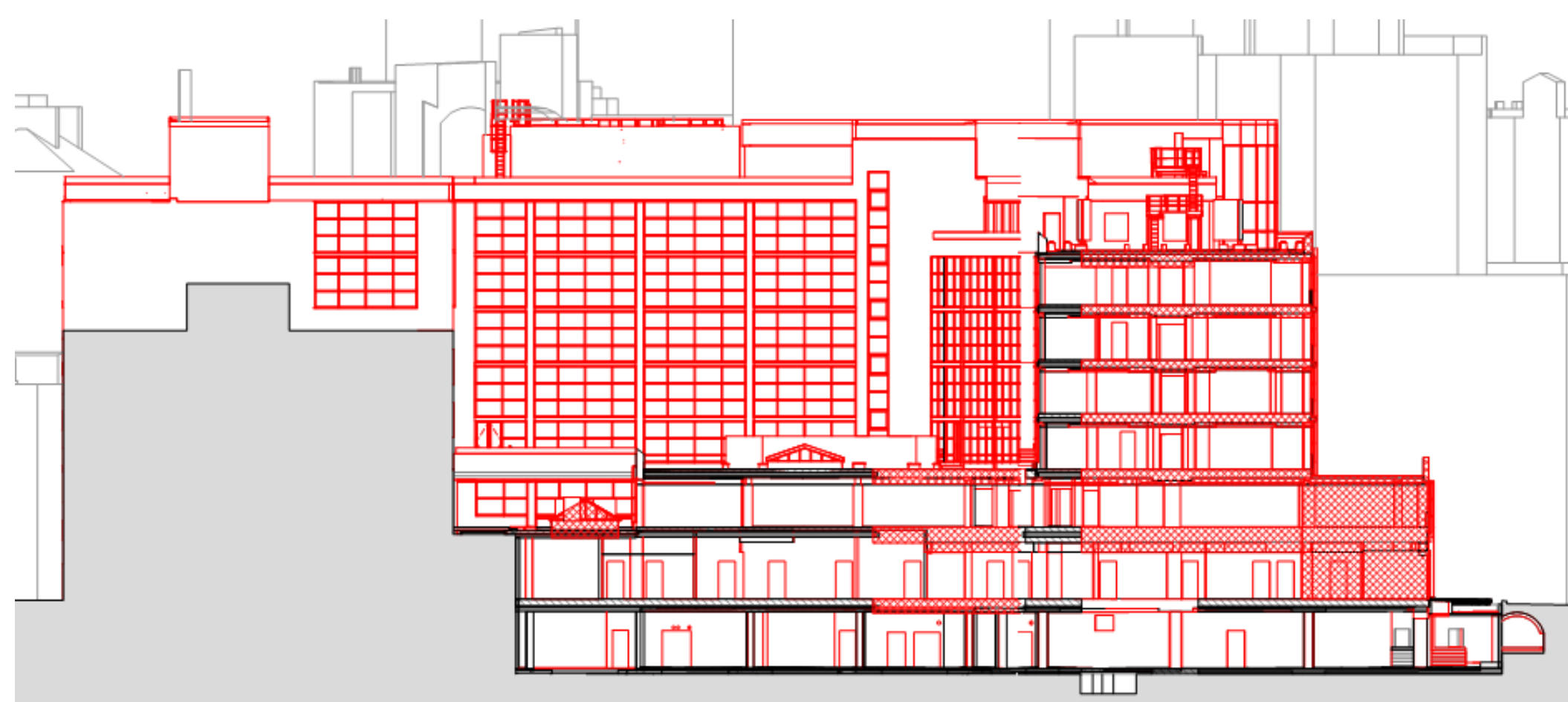
Left: Proposed William Road elevation



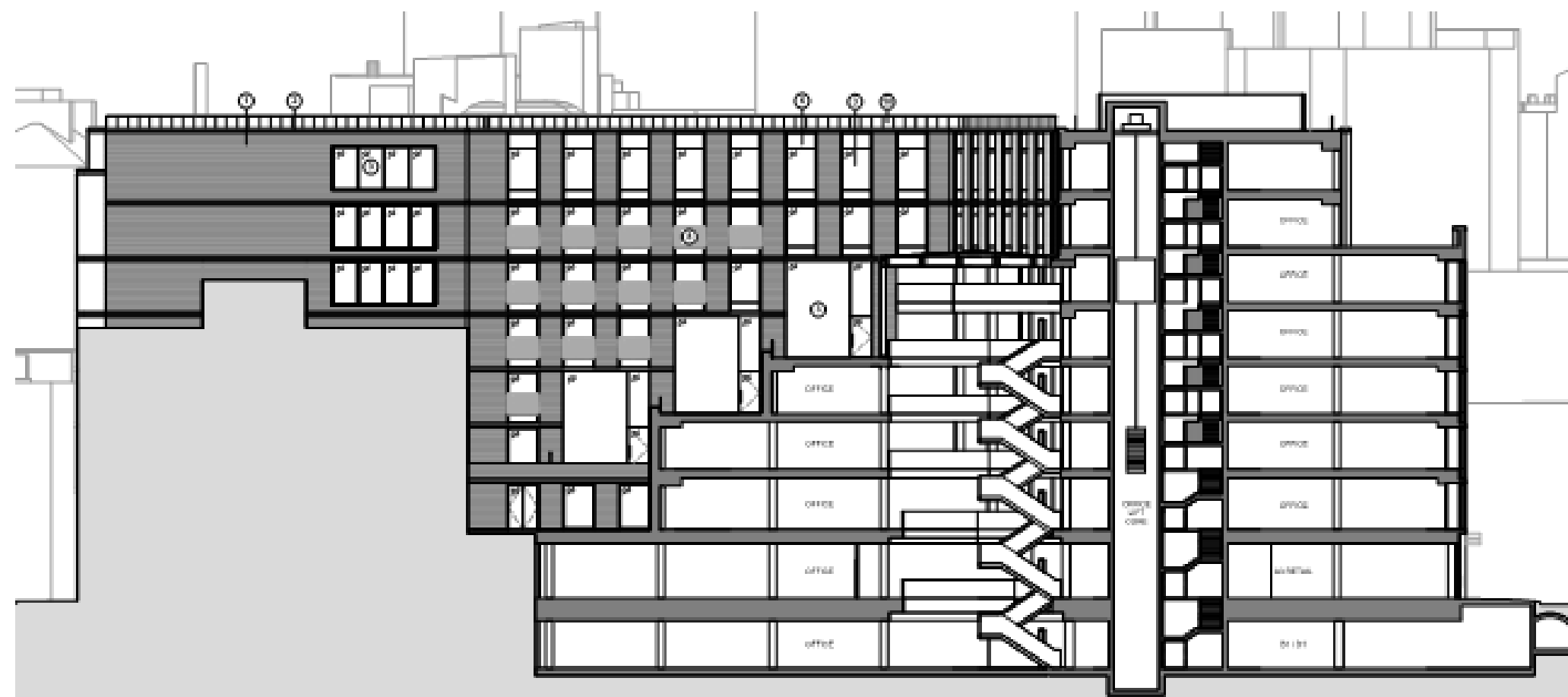
Right: Existing section AA



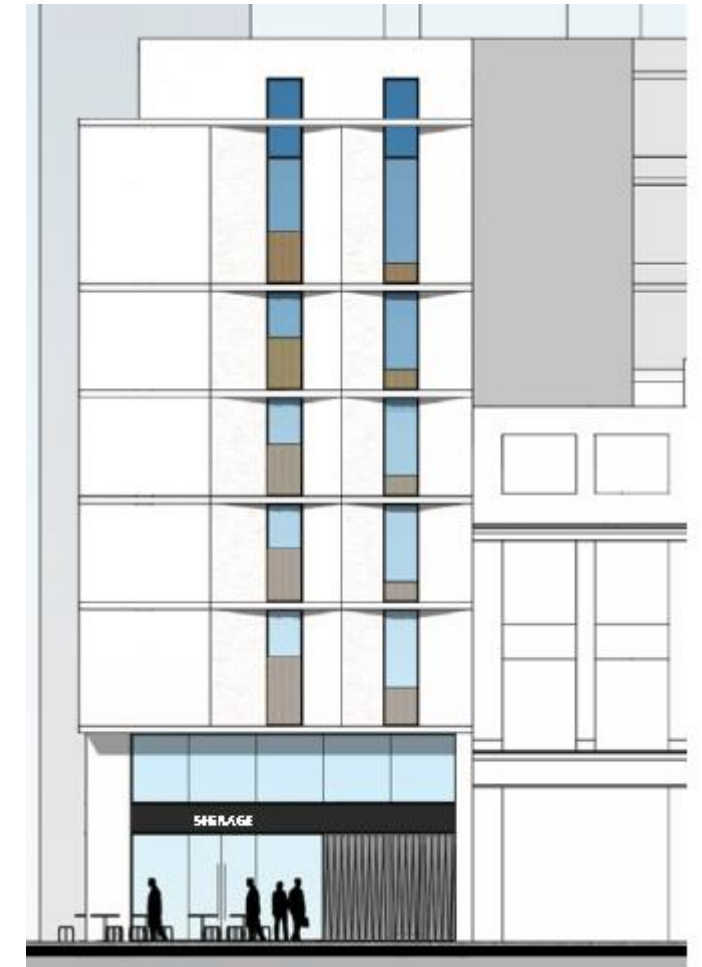
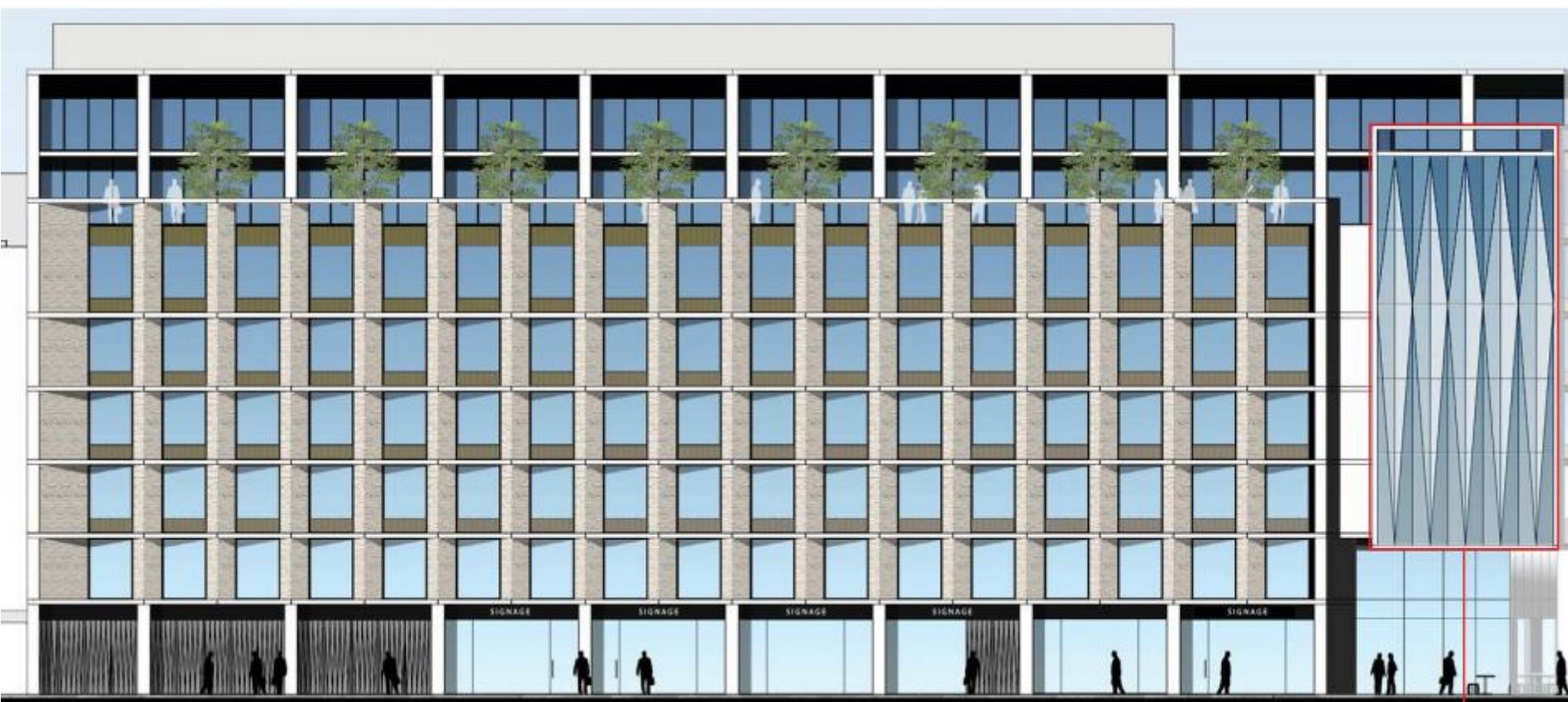
Right: Proposed section AA



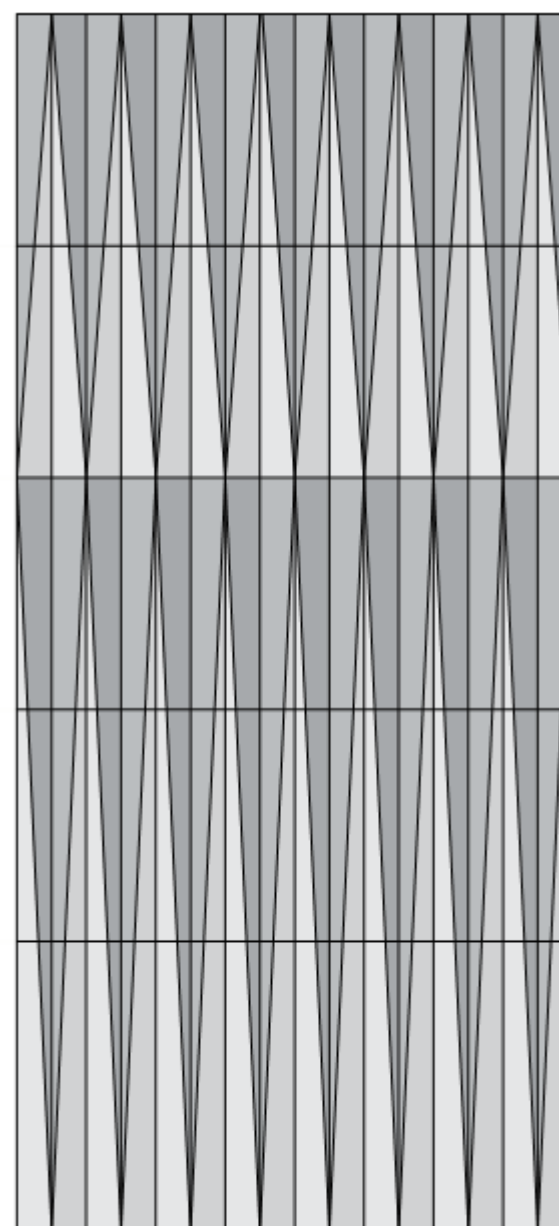
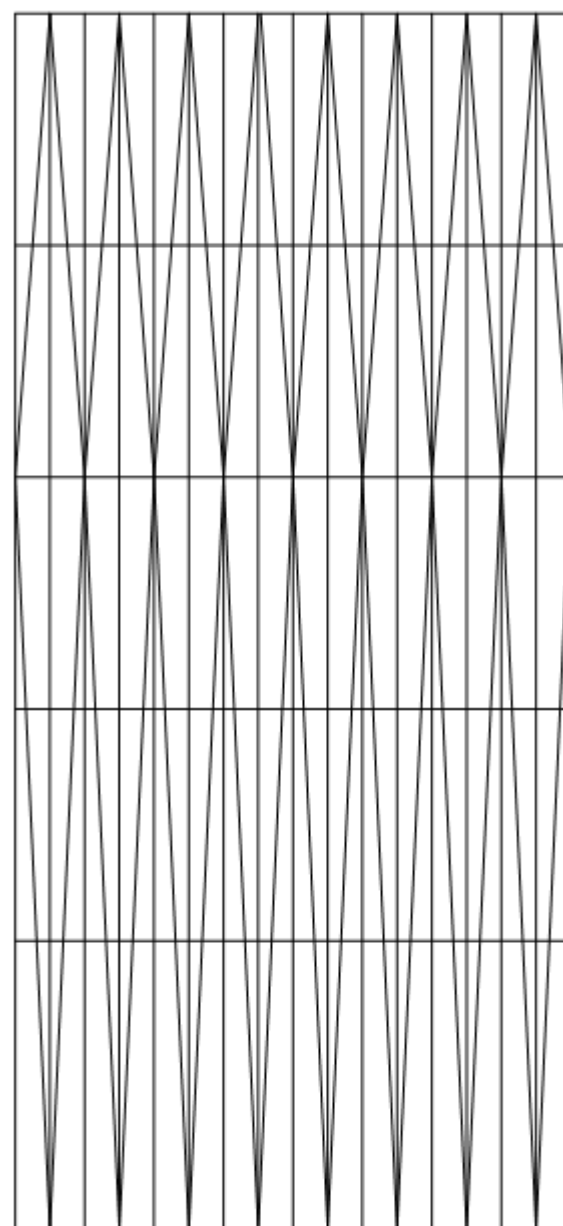
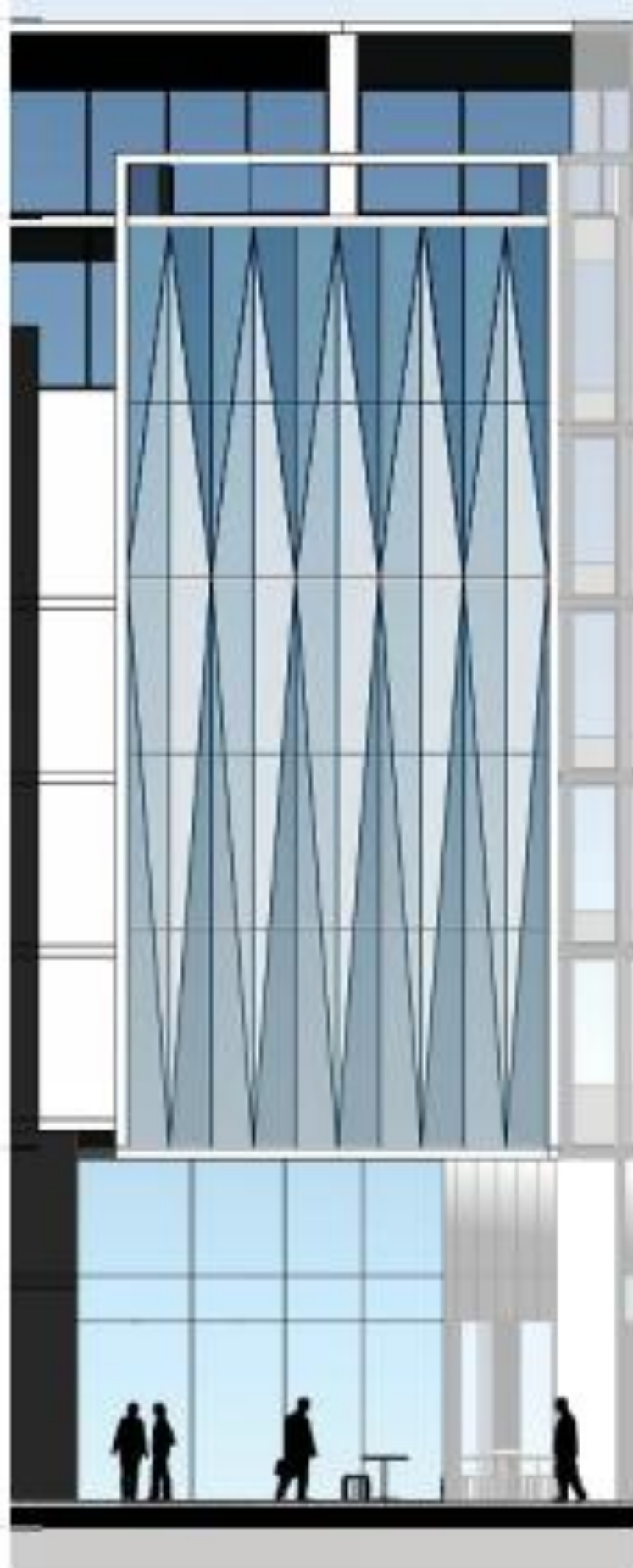
Right: Existing section BB



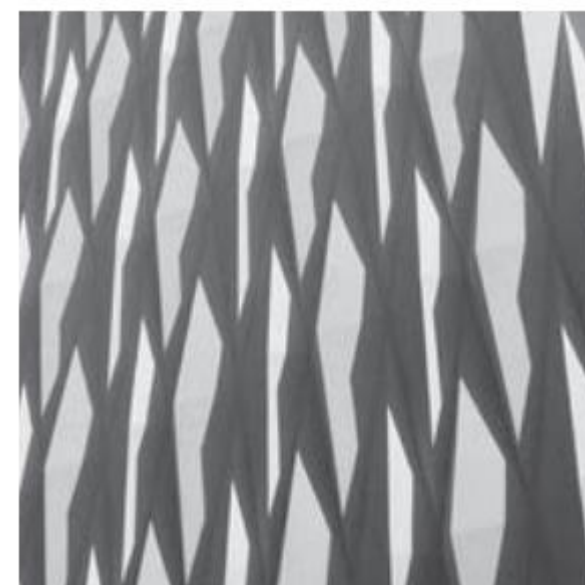
Right: Proposed section BB



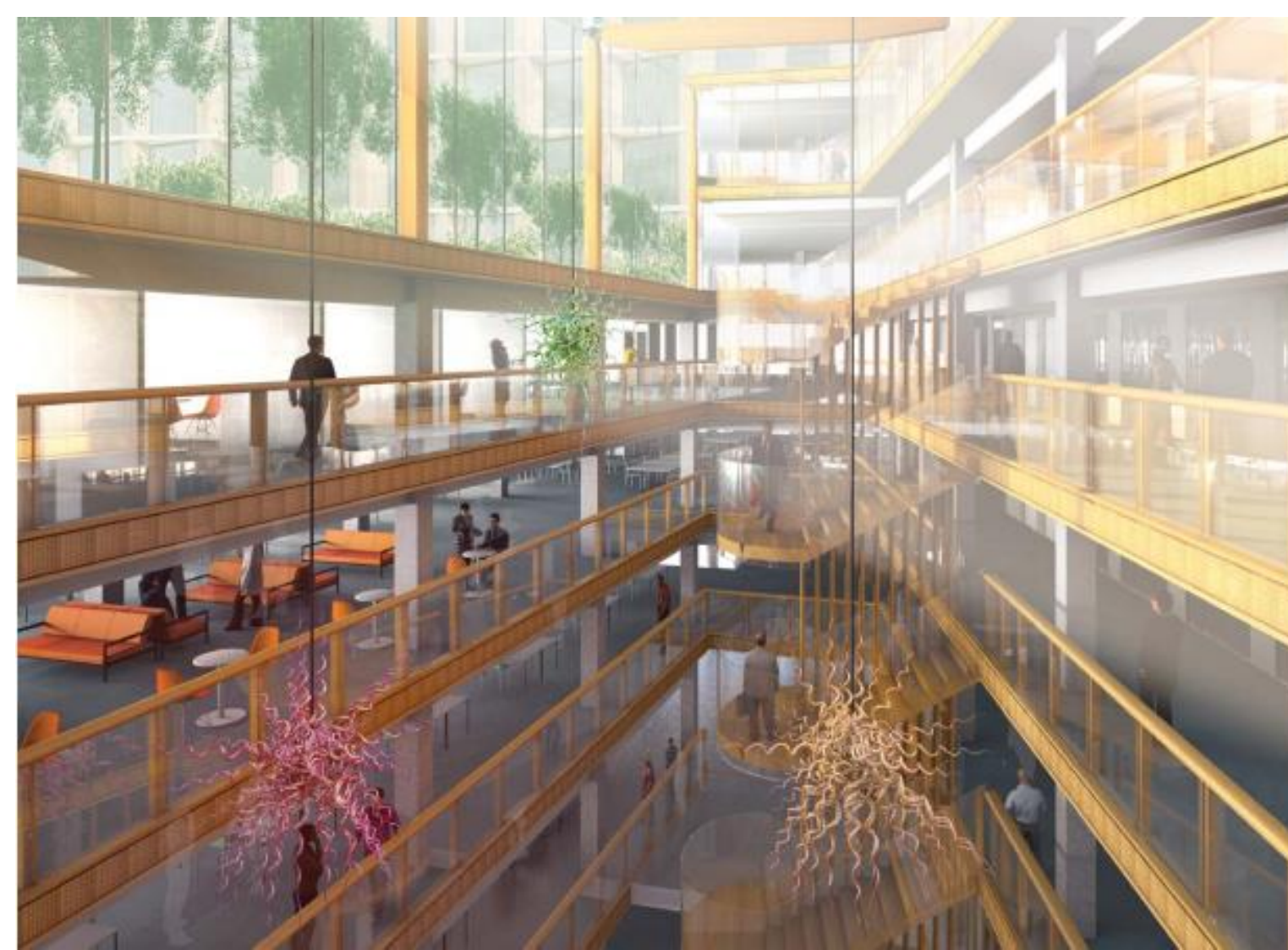
Above: Coloured elevations



Three dimensional pleated glazed facade



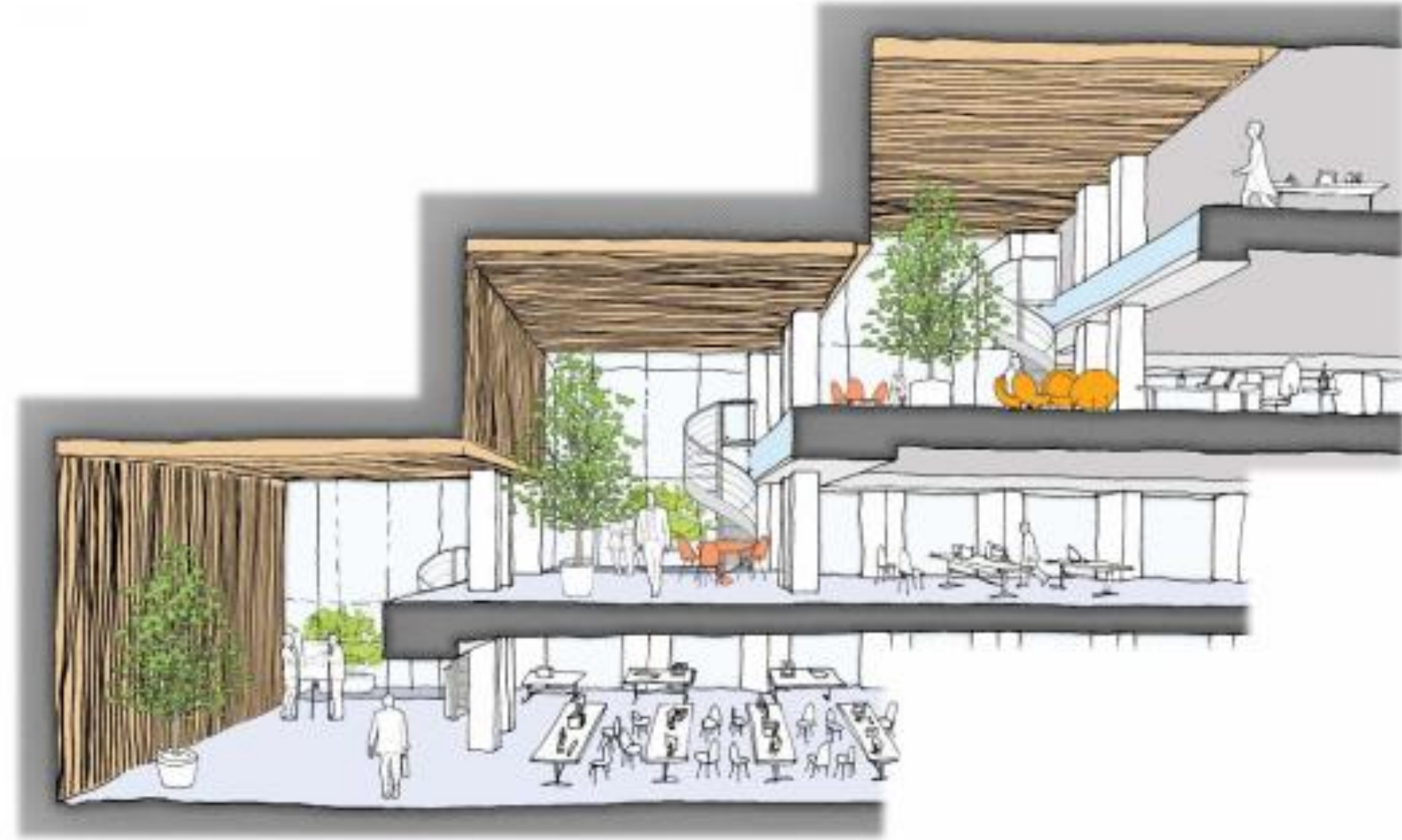
Left and above: Lantern facade



Above: Artists impression of atrium



Right: Office entrance

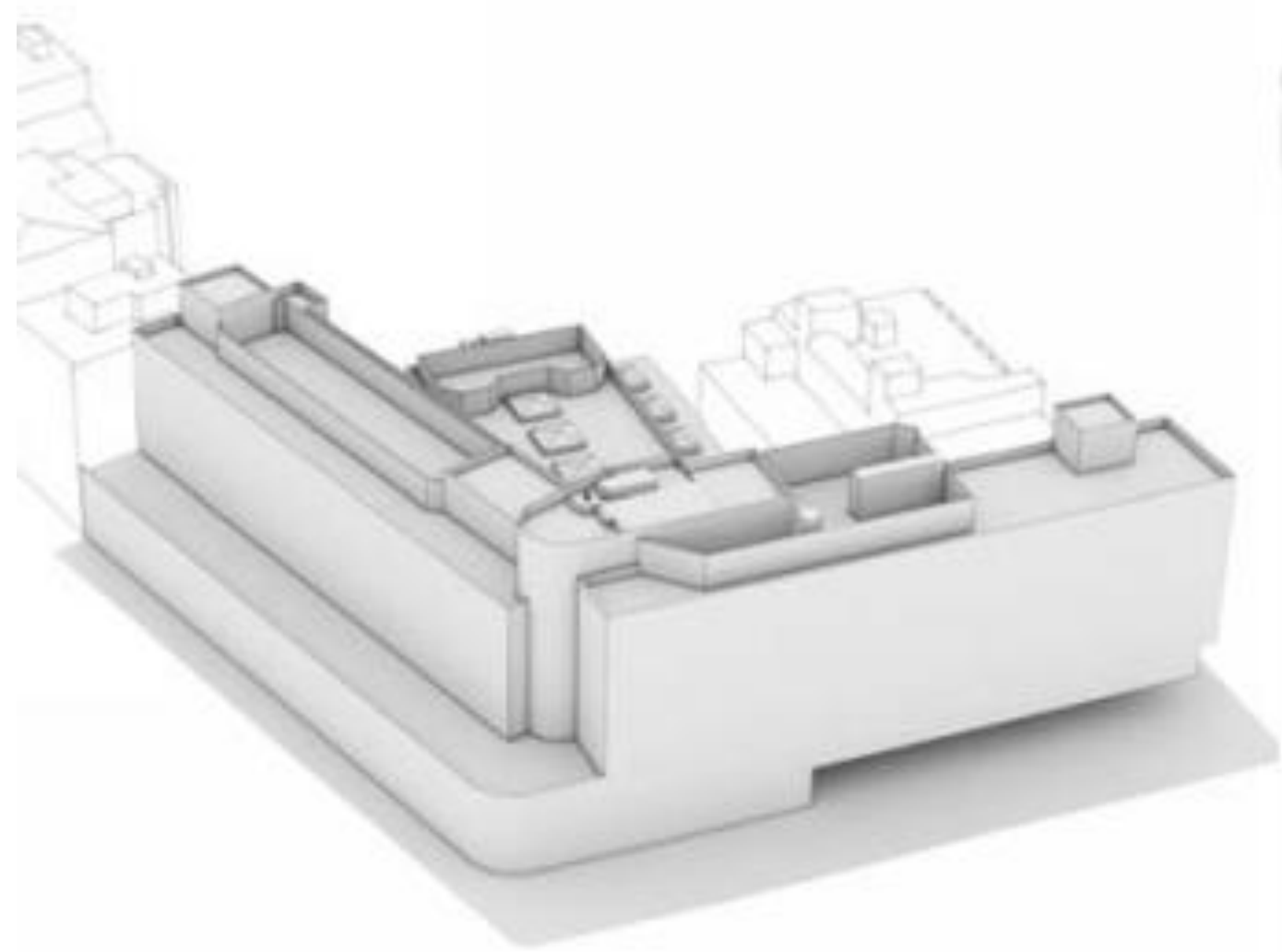


Above, below and right: Office pocket gardens

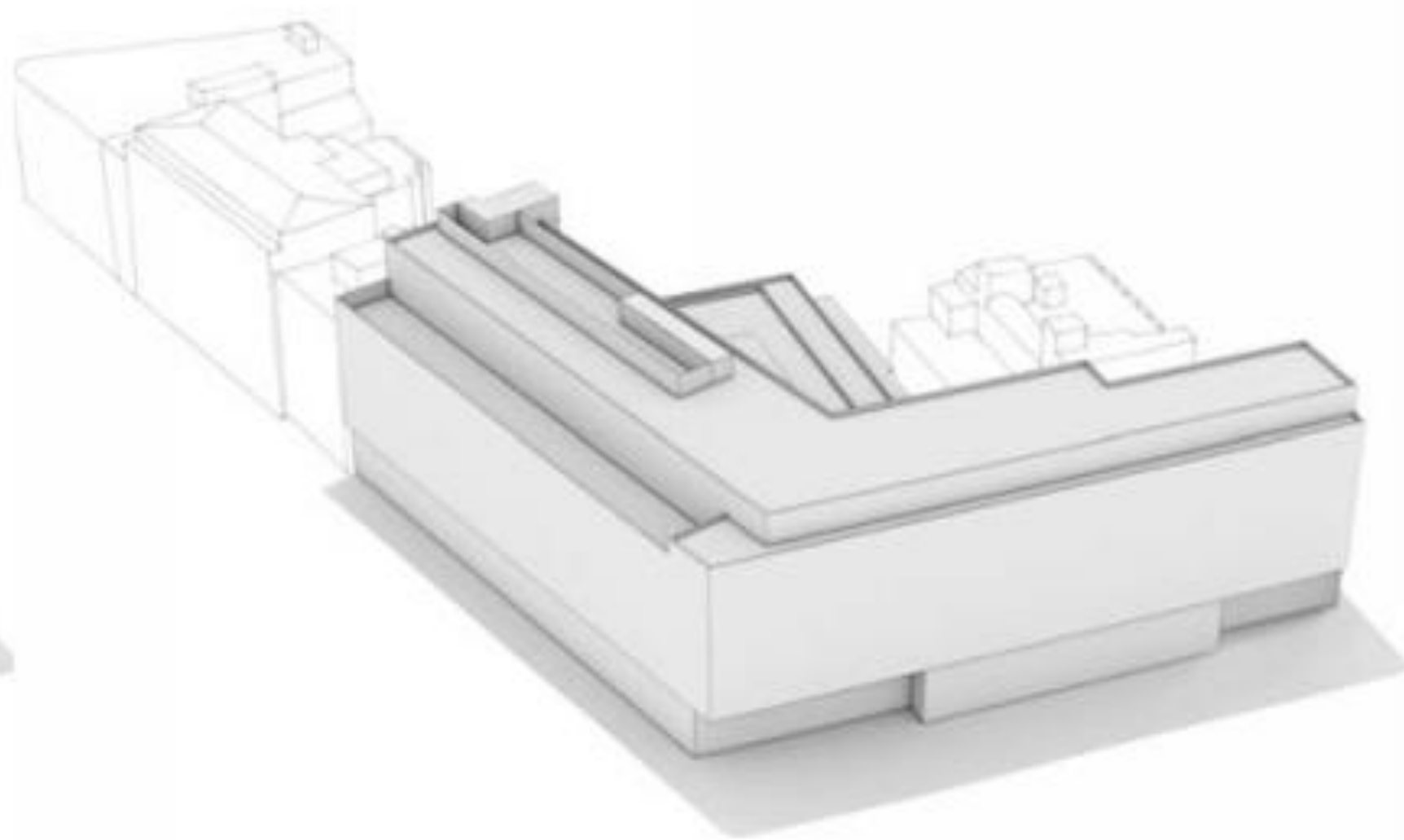




Office terraces



Existing Massing

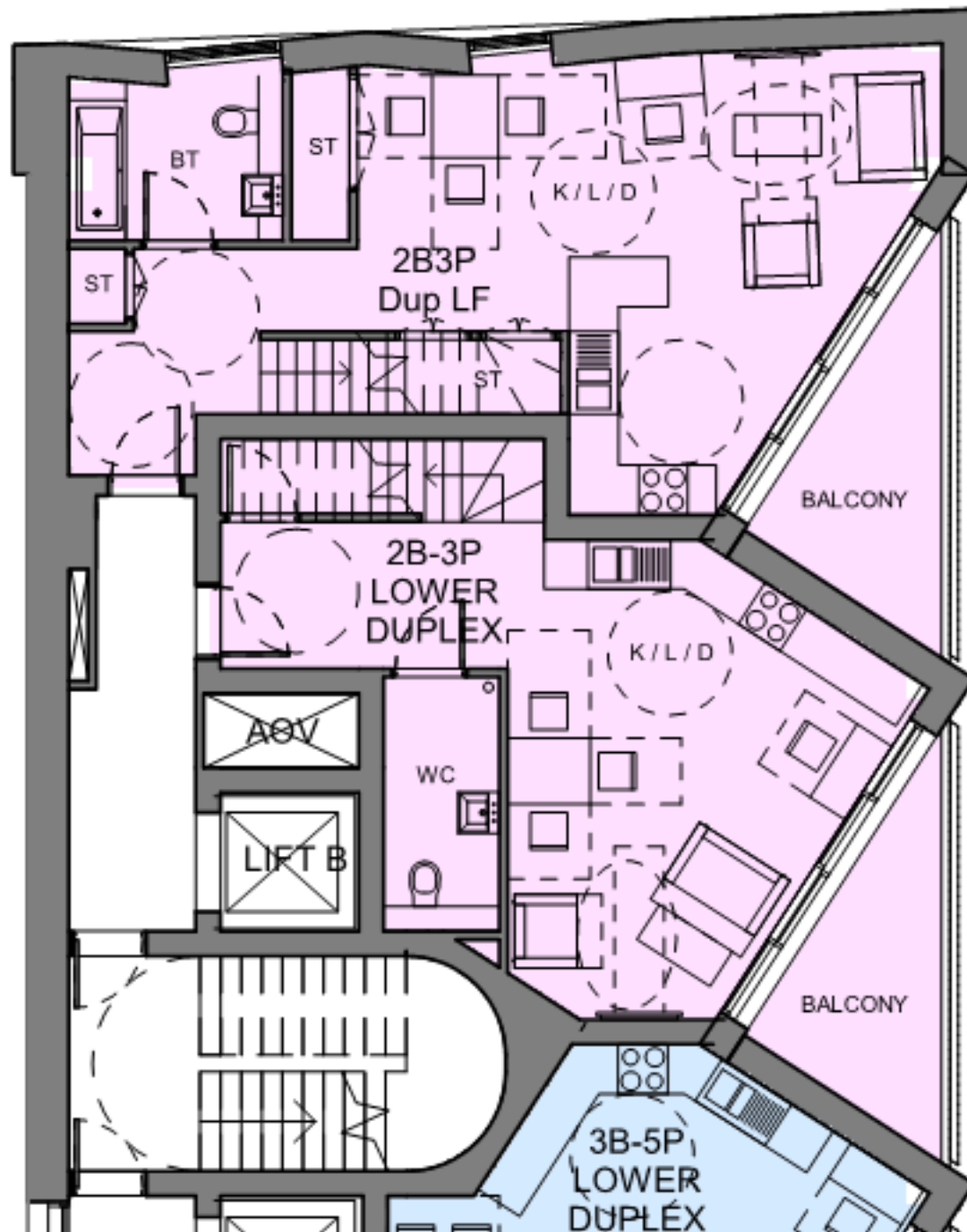


Proposed Massing

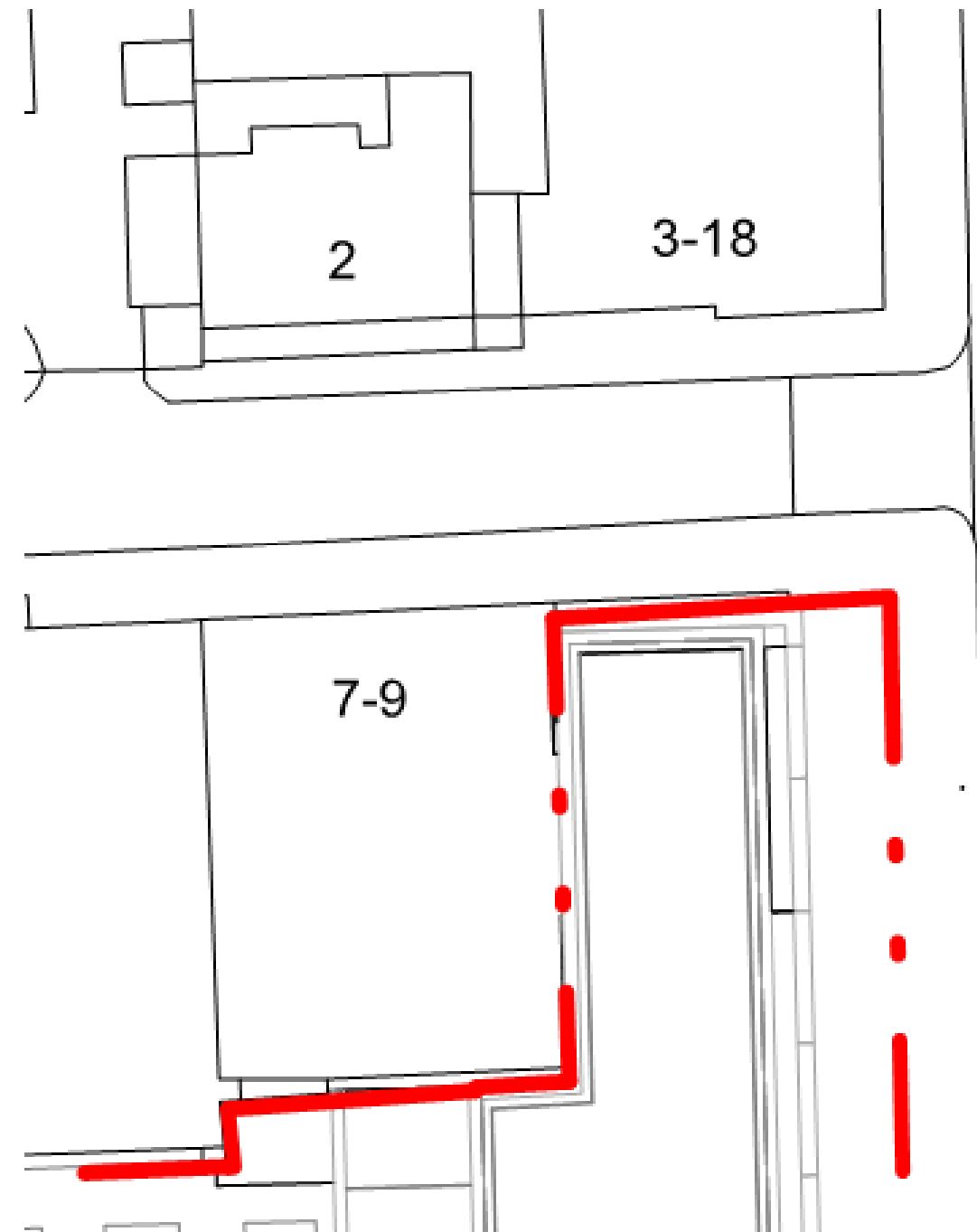


CGIs





Above: Angled windows on William Road elevation to avoid overlooking with properties opposite.



Above: Relationship of elevation in the left image to properties opposite.