

**Dual Use Student Accommodation and Hotel
Stephenson Way, Euston
NW1 2HD**



Planning Statement
tp bennett

for
Oakwood International Investment Corporation

May 2018

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APPENDICES

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1 INTRODUCTION

1.1 This Planning Statement is submitted in support of a planning application made by Oakwood International Investment Corporation for a proposed dual use student accommodation and hotel building at a vacant site on Stephenson Way, Euston, NW1 2HD.

1.2 The Local Planning Authority for the site is The London Borough of Camden Council [LBC].

1.3 The proposed development is as follows:

Erection of a seven-storey building plus basement for dual student accommodation (C2) and hotel (C1) use with 78 rooms of accommodation on the upper floors with shared amenity space at ground and sixth floor level, plus basement level storage. Retention of the vehicular easement from Stephenson Way to the rear of 222 Euston Road.

1.4 This proposal for dual use student and hotel accommodation arises from the site's location and presents an opportunity to create a flexible, adaptable building to be occupied year-round. It will provide accommodation for students during term time and a base for visitors during the summer months, when visitor numbers are high. The site is located close to Euston Station and other national and international rail connection, as well as the London Underground. It is within easy reach of many of London's university campuses.

1.5 Unlike many student accommodation buildings that achieve planning permission, then later seek to vary s.106 clauses to allow summer lets to non-students, in effect creating a summer hotel, this proposal seeks dual use upfront with a building designed specifically for both end users. The increasing demand for communal, flexible spaces within the student market lends itself to dual use with hotel, and the site's location demands a building that is flexible, capitalising on the site's excellent accessibility.

1.6 The proposal has been tested by market experts in both student accommodation and hotel management. As a result, the design has rationalised to ensure it is suitably flexible and adaptable for both end users.

1.7 This Planning Statement assesses the proposals against policies in the Development Plan and other material considerations. The Statement is structured as follows:

- Section 2 – provides detail of the application proposals
- Section 3 – briefly describes the site and surrounding area
- Section 4 – outlines the site’s planning history
- Section 5 – provides an overview of the principal planning policy and guidance relevant to the assessment of the proposed development
- Section 6 – provides an assessment of the proposal against the provisions of the Development Plan and other material considerations
- Section 7 – considers the likely approach to planning obligations
- Section 8 – conclusions

1.8 This Planning Statement should be read in conjunction with the following documents:

- Application form and certificates (online)
- Site location plan, existing and proposed drawings (tp bennett)
- Design and Access Statement (tp bennett)
- Energy and Sustainability Statement (Thornley Lumb)
- Transport Assessment (Robert West)
- Basement Impact Assessment (CGL)
- Student Management Plan (Urban Student Life)
- Ecology (PJC Consultancy)
- Air Quality Assessment (Hoare Lea)
- Noise and Vibration (EQUUL)
- Drainage Strategy (Lanmor)
- Desk Top Archaeological Assessment (CGMS)
- Desk Top Contamination Assessment (MLM)
- Health Impact Statement (tp bennett)
- Outline CMP (tp bennett)

In pre-application discussions, officers have agreed that the following documents would be secured by condition or obligation;

- Travel Plan
- Delivery Service Management Plan
- Construction Management Plan

2 PROPOSED DEVELOPMENT

2.1 The proposed development is as follows:

Erection of a seven-storey building plus basement for dual student accommodation (C2) and hotel (C1) use with 78 rooms of accommodation on the upper floors with shared amenity space at ground and sixth floor level, plus basement level storage. Retention of the vehicular easement from Stephenson Way to the rear of 222 Euston Road.

2.2 As set out in detail in the accompanying Design and Access Statement and scheme drawings, the development includes:

- A total of 78 bedrooms with a mix of self-contained and shared facility living, capable of student occupation during university terms and visitor occupation outside these times.
- 58 studio rooms (including 5 DDA studios)
- 15 threedio rooms
- Part 6, part 7 storey building incorporating basement and a roof terrace amenity area
- 5 wheelchair accessible bedrooms, located throughout the building
- Communal social and study spaces at ground, and 6th floor level (adjacent to roof terrace) to encourage convivial living
- Staffed reception area
- Dedicated music and practice rooms in the basement to minimise disturbance
- Basement location for building services, including refuse store allowing vehicle access off-street, from Stephenson Way
- Secure storage for 40 cycles in the basement
- On-site laundry

2.3 A key feature of this student accommodation model is the inclusion of en-suite studio bedrooms alongside clustered bedrooms with residents sharing a communal kitchen, WCs and showers. This type of arrangement provides a choice of lifestyle and budget and including shared facilities and communal space within the building, which aims to avoid the isolation of individual residents.

- 2.4 Each studio bedroom includes a bed, wardrobe, storage and desk furniture. The unit sizes vary, with micro studio, standard studio, wheelchair accessible studio all with a private bathroom and sink, WC and shower unit. A 'threedio' has three bedrooms but incorporates a shared kitchen, WC and shower rather than an en-suite for each bedroom.
- 2.5 The ground and sixth floor communal spaces (plus basement music rooms) provide a social function on different levels of the building. It also ensures that the building addresses the street, providing much needed activation, vitality and natural surveillance to Stephenson Way.

2.6



Figure 1: Ground Floor communal space, activation and natural surveillance

3 SITE AND SURROUNDING AREA

3.1 The site

- 3.1.1 The 430m² site is located within the administrative boundary of the London Borough of Camden (LBC).
- 3.1.2 A detailed analysis of the site and surrounding area is provided in the submitted Design and Access Statement.
- 3.1.3 The site is currently vacant. There is an easement providing vehicular access to 222 Euston Road.
- 3.1.4 The site location is shown in Fig 2 below.

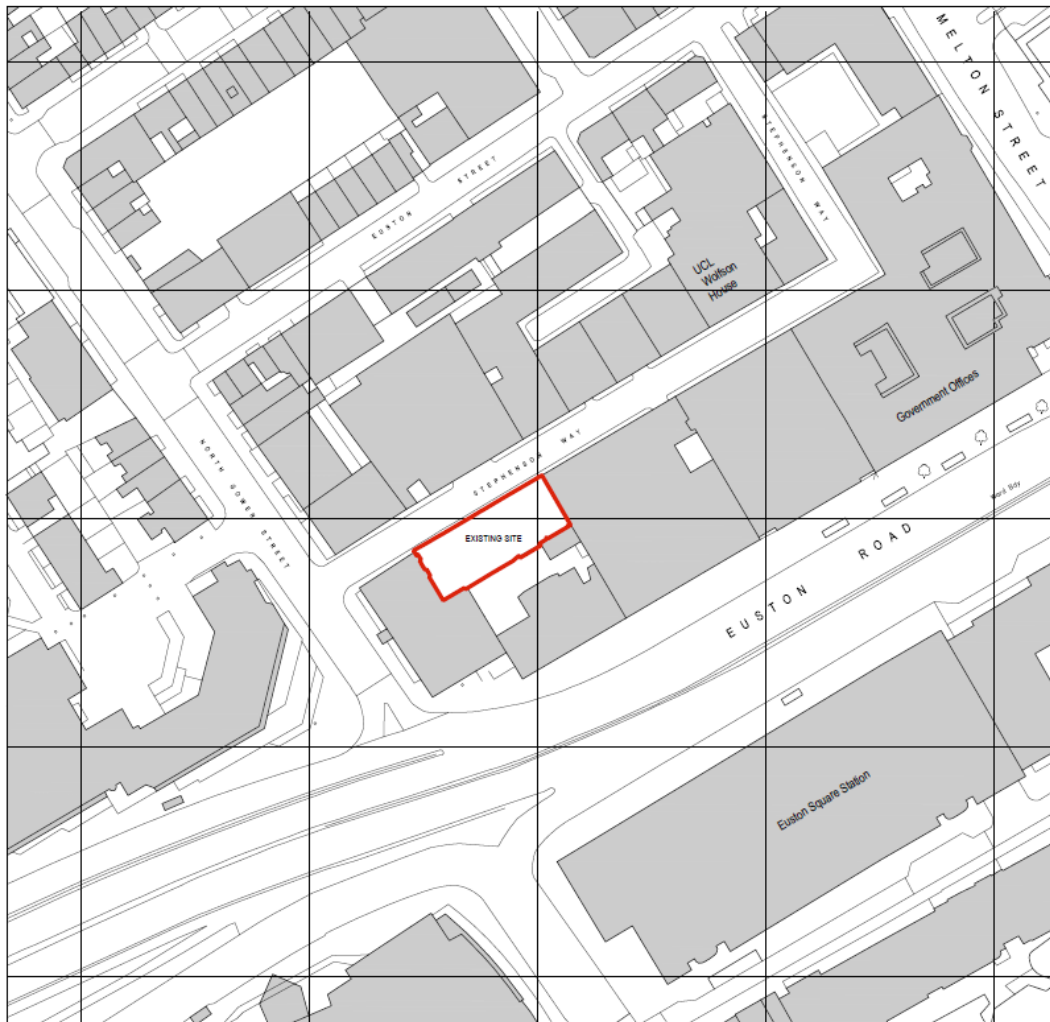


Figure 2: Site location

3.2 The surrounding area

- 3.2.1 The site is located on Stephenson Way, a one-way cobbled street connecting North Gower Street and Euston Road with Euston Street and Euston Square. It is a highly accessible location with a PTAL of 6b (highest achievable). Euston station is 200m to the east, Euston Square Underground Station is 100m to the south, and Warren Street Underground Station is 250m to the west
- 3.2.2 The immediately surrounding area is home to a number of academic institutions, hotels, student accommodation, offices and local amenities.
- 3.2.3 North of the site (on the opposite side of Stephenson Way) is a row of six and seven storey buildings accommodating offices and academic institutions.
- 3.2.4 There are two locally listed buildings on the opposite side of Stephenson Way, which are late Victorian-era warehouse and manufacturing buildings.
- 3.2.5 South of the site is UCL's FARR institute (222 Euston Road), a six-storey office and research building. An easement runs through the application site, providing servicing access to 222 Euston Road.
- 3.2.6 East of the site is the Aga Khan University (210 Euston Road), a part twelve-storey office and research building. Next door to this is IQ Bloomsbury (200 Euston Road), a recently converted seven-storey student accommodation building.
- 3.2.7 West of the site is Euston Square Hotel (152-156 North Gower Street), a five-storey building that occupies the corner site of North Gower Street and Euston Road.
- 3.2.8 These key features are shown on the annotated aerial photograph overleaf (Fig 3).

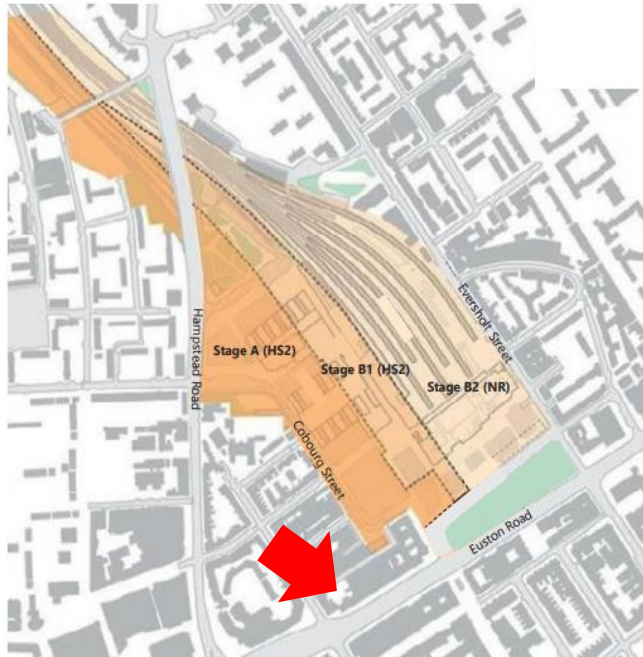


Figure 3: Aerial Photograph of site and surroundings

3.2.9 The surrounding area is subject to major change as part of the HS2 Euston Station redevelopment. As a result, there are a number of nearby properties subject to Compulsory Purchase Orders, with major site clearances planned in the area up until June 2021. More details are provided in paragraph 4.2 below.

3.3 **Development in the Vicinity**

3.3.1 As mentioned above, the surrounding area forms part of the HS2 Euston Station redevelopment. The redevelopment of the station makes use of land to its immediate west (stages A and B shown in figure 4). To facilitate this, a cluster of buildings at the eastern end of Stephenson Way (where it meets Euston Street and Melton Street), are already in the early stages of demolition. These buildings include Walkden House, The Cottage Hotel and Wolfson House. The majority of these works have little overall impact on Stephenson Way (other than road closures), and once a detailed construction programme is produced for the application proposal, liaison with the relevant organisations will be required to coordinate the approach. The application proposal site is identified with a red arrow on the following images.



- Stage A:** HS2 Phase 1 requirements will be delivered on new land west of the current station footprint, constructing six platforms to be operational by 2026.

- Stage B1:** HS2 Phase 2 requirements are then delivered so that five further platforms will be operational by 2033, serving stations beyond Birmingham.

- Stage B2:** Redevelopment of the NR Station. Future decisions on this stage will be subject to development of a business case, funding availability and attainment of any required planning powers.

Figure 4 OSD Memorandum Construction Phasing

3.3.2 The construction phasing diagram (figure 4) shows the sites proximity to the Hs2 station redevelopment and the intended timing of construction.

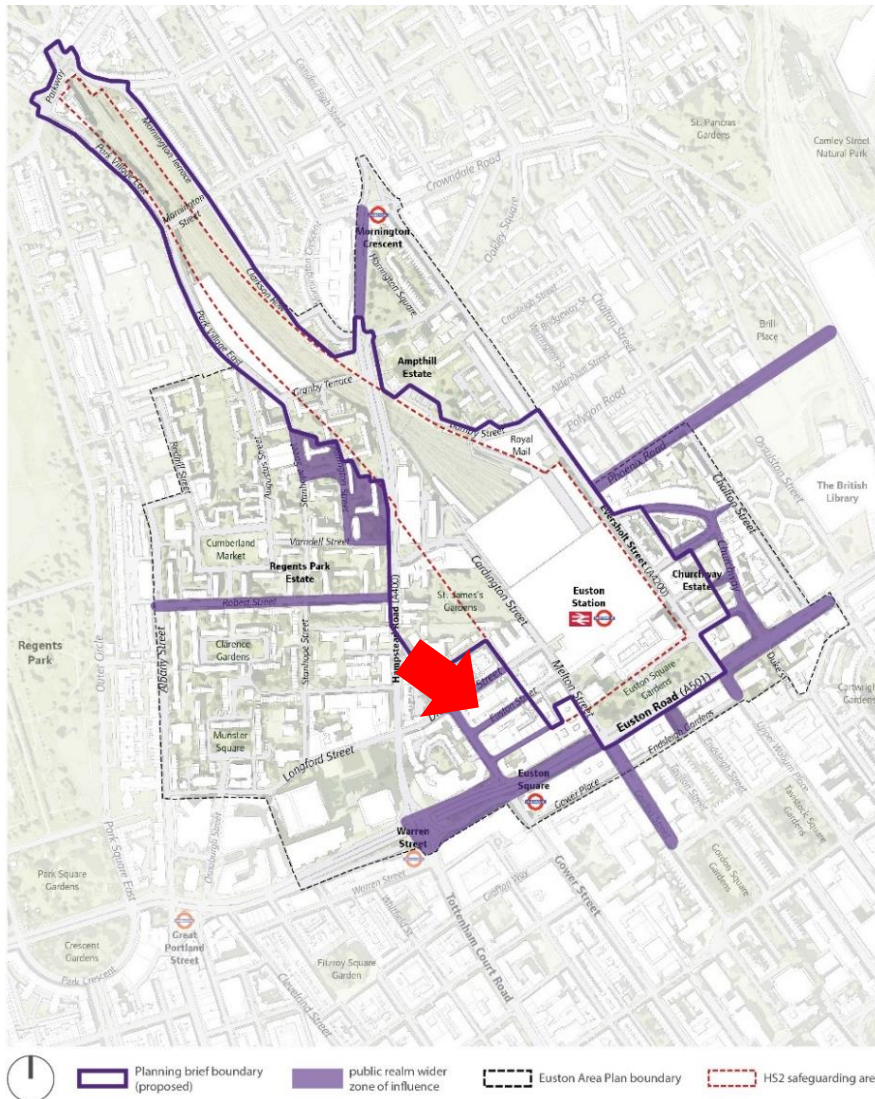


Figure 5: Euston Area Plan Planning Brief Boundary

3.3.3 The planning brief boundary (figure 5) shows proposed public realm enhancements to Stephenson Way, North Gower Street, and Euston Road.



Figure 6 Indicative Future Redevelopment (Euston Area Plan 2015)

3.3.4 The Euston Area Plan (figure 6) shows an indicative future development scenario. Of most relevance to the application proposal are the blue (commercial led mixed use) zones on the eastern end of Stephenson Way, Melton Street and the station itself.

4 PLANNING HISTORY

4.1 Planning history

- 4.1.1 The site has no planning application history. The planning history of the two neighbouring sites is set out below. The main application of relevance is 210 Euston Road, reference 9000350.

210 Euston Road

Reference	Description of development	Decision/date
7763	Erection of an additional storey (seventh floor) for office use at No. 210, Euston Road (ref 7763)	Granted 20/11/1969
8800548	Redevelopment of the site by the erection of a seven storey building for B1 use at 210 Euston Road and a six storey residential building at 43-55 Stephenson Way (ref 8800548)	Granted on appeal 30/03/1989
9000350	Demolition of existing buildings and construction of a new development comprising business use (B1) and residential premises for which detailed consent was given on 10th January 1990 (Reg.No.PL/8900410). Maintain existing right of way through 210 site to access 222 site (ref 9000350).	Granted 02/07/1991

222 Euston Road

Reference	Description of development	Decision/date
9200646	redevelopment of the site by the erection of a building consisting of 6 500 square metres of office accommodation and 2 100 square metres of residential flats (ref 9200646)	Granted 01/07/1993
2013/5523/ P	Erection of a basement ground and six storey building to be used for purposes defined by Class B1 of the Town and Country Planning (Use Classes) Order 1987	Granted 13/12/1990
2013/5523/ P	Change of use of lower ground to fourth floor from offices (Class B1) to dual use education (Class D1) and office (Class B1) for a temporary period of 10 years (ref 2013/5523/P)	Granted 03/12/2013

4.2 Pre-application discussions

- 4.2.1 A submission for pre application advice was made to LBC on 25th August 2017. A meeting was held on site on 25th September with Council officers. The case officer provided written feedback on 24th October 2017.
- 4.2.2 The proposal submitted for pre application advice comprised an eight-storey student accommodation building with ground floor amenity, basement level storage and 92 student beds on the upper floors. Key issues discussed with officers are summarised below:
- 4.2.3 Land use: Officers stated that the proposed student accommodation (C2) was acceptable in principle, subject to compliance with various local policies.
- 4.2.4 Design: It was recommended that the two set back upper storeys be removed, and that a further set back storey may be possible at roof level depending on its impact on agreed views, in particular from North Gower Street and to the southwest on Euston Road. Finer details regarding the double storey ground floor, parapet height, fenestration detailing, and differentiation of the vehicular entrance were also recommended.

4.3 Design Review Panel

- 4.3.1 The application was presented to Camden's Design Review Panel on 10th October 2017. The Panel's comments were received 24th November 2017.
- 4.3.2 The proposal presented to the panel had already responded to the pre application advice received and comprised a seven-storey student accommodation building with ground floor amenity, basement level storage and 80 student rooms on the upper floors. The detailing of the ground floor, vehicular entrance, and fenestration had all changed. The two upper storeys of setback accommodation had been removed, and one additional set back level of accommodation was illustrated by photomontages and key views, as requested by officers.
- 4.3.3 Overall, the Design Review Panel welcomed the principle of developing the vacant site. Comments were made with regard to the proposed massing and density, the quality of the accommodation, architectural expression and adaptability.

Design Development (post pre-application and design review)

- 4.3.4 In revisiting the proposal in light of the pre application advice and Design Review Panel comments, the proposal is now to become dual use, to include additional communal spaces on the ground and sixth floor, with external terraces at sixth floor level, and reducing the total number of rooms to 78. This gives the building greater efficiency and adaptability, increasing the amount of communal and amenity spaces, and ensuring it is occupied year round.
- 4.3.5 Further refinements include additional windows to provide light into the corridors, and internal rearrangement to maximise the amenity value of the basement and sixth floor communal areas (to include a music room and external terraces respectively). The ground floor has additional flexible spaces, and the whole floor has a communal function, creating an active frontage to Stephenson Way.

4.4 **Statement of Community Involvement**

- 4.4.1 Neighbouring properties have been consulted on the proposals: a letter was circulated 16/04/2018 (see appendix 1) to the immediate surrounding properties on Stephenson Way, North Gower Street, and Euston Road.

5 PLANNING POLICY

5.1 Introduction

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.1.2 In this case, the Development Plan comprises:

- NPPF (2012)
- London Plan (2016)
- Draft London Plan (2017)
- Camden Local Plan (2017)

5.1.3 Consideration is also given to supplementary planning documents (SPDs).

5.2 National Planning Policy

5.2.1 National planning policy is contained in the National Planning Policy Framework (NPPF, 2012). At the heart of the NPPF is a presumption in favour of sustainable development (para 14) and that applications for additional housing should be considered in the context of that presumption (para 49).

5.3 Regional Planning Policy

5.3.1 The relevant policies from the London Plan (2016) are:

- Policy 3.8 Housing Choice
- Policy 4.5 London's Visitor Infrastructure
- Policy 5.2 Minimising carbon dioxide emissions
- Policy 5.3 Sustainable design and construction
- Policy 5.13 Sustainable drainage

5.3.2 The relevant policies from the Draft London Plan (2017) are:

- Policy H17 Purpose Built Student Accommodation
- Policy D9 Basement development
- Policy E10 Visitor Infrastructure
- Policy S12 Minimising Greenhouse Gas Emissions
- Policy H17 Student Accommodation

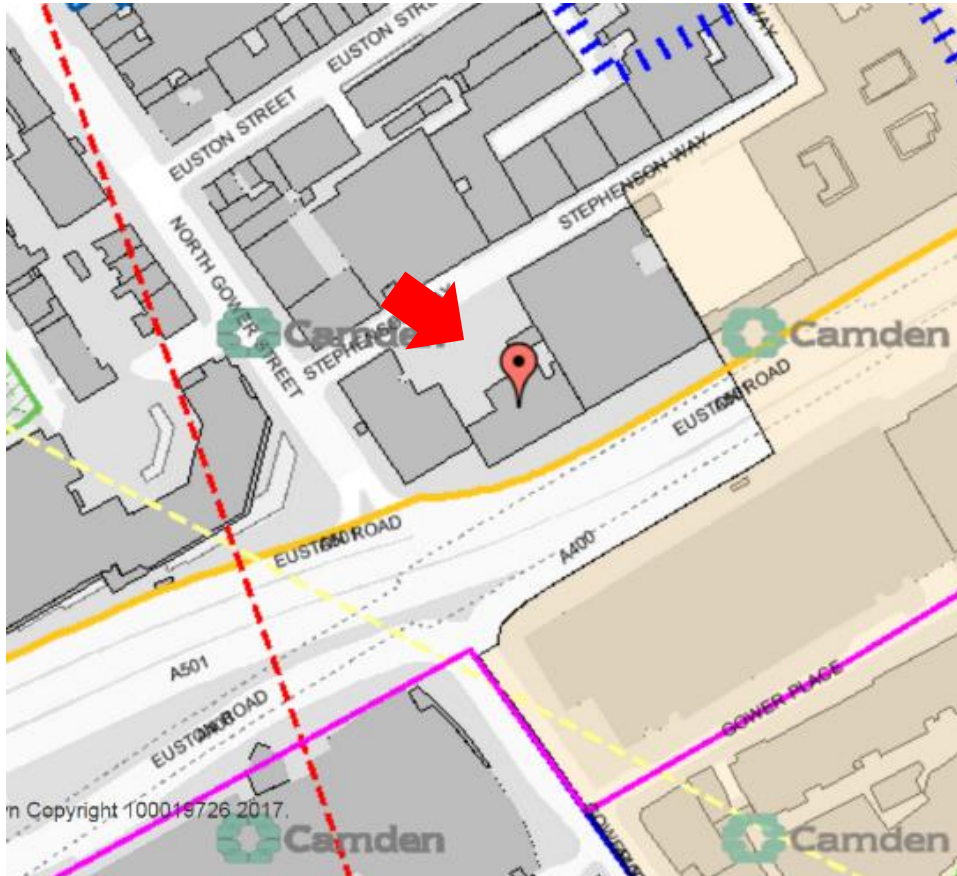
5.4 Local Planning Policy

5.4.1 Local development plan policies for the area are contained within the Camden Local Plan (2017).

5.4.2 The relevant policies from the Local Plan are as follows:

- G1 – Delivery and location of growth
- H1 – Maximising housing supply;
- H2 – Maximising supply of self-contained housing in mixed-use schemes
- H4 – Maximising the supply of affordable housing 3
- H6 – Housing choice and mix;
- H7 – Large and small homes;
- H9 – Student housing
- C1 – Health and wellbeing
- C5 – Safety and security;
- C6 – Access for all
- A1 – Managing the impact of development;
- A2 – Open space
- A3 – Biodiversity;
- A4 – Noise and vibration;
- A5 – Basements;
- D1 – Design;
- CC1 – Climate change mitigation;
- CC2 – Adapting to climate change
- CC3 – Water and flooding;
- CC4 – Air quality;
- CC5 – Waste;
- DM1 – Delivery and monitoring
- T1 – Prioritising walking, cycling and public transport;
- T2 – Car-free development and limiting the availability of parking

5.4.3 Figure 7 below provides an extract from the Proposals Map relating to the application site.



Map key





-  Designated View
-  5A.2 Greenwich Park Wolfe statue to Tower Bridge - Right Lateral Assessment Area
-  Central London Area
Central London Area (Clear Zone Region) CLA
-  Growth Area
Euston

Figure 7 – Proposals Map Extract

- The site is not located within a Conservation Area
- The site is highlighted in the Euston Area Planning brief as being in a public realm wider zone of influence
- The site is also located in the Euston Growth Area

5.5 **Other material planning considerations**

5.5.1 The LPA's pre-application advice refers also to the following relevant documentation:

- Euston Area Plan
- Euston Growth Strategy
- Euston Station Planning Brief

5.5.2 LBC currently have an adopted Community Infrastructure Levy (CIL) charging schedule in place. The site is located within charging zone A (central), which carries the following charges:

- £175 per sq.m student accommodation
- £40 per sq.m hotel

5.5.3 The application is also subject to the Mayor's CIL, which is charged at the following flat rate:

- £50 per sq.m

5.5.4 Both Camden's and the Mayor's CIL are index linked.

6 ASSESSMENT OF THE PROPOSAL

6.1 Introduction

6.1.1 As outlined in Section 2, the application seeks planning permission for the following development:

Erection of a seven-storey building plus basement for dual student accommodation (C2) and hotel (C1) use with 78 rooms of accommodation on the upper floors with shared amenity space at ground and sixth floor level, plus basement level storage. Retention of the vehicular easement from Stephenson Way to the rear of 222 Euston Road.

6.1.2 This section of the Planning Statement assesses the proposal against the Development Plan and other material considerations. The main issues to be addressed in respect of this application are:

- Land use (see section 6.2)
- Design (townscape and views, daylight and sunlight) (6.3)
- Basement Construction (6.4)
- Energy (6.5)
- Air Quality (6.6)
- Archaeology (6.7)
- Drainage and SUDS (6.8)
- Contamination (6.9)
- Ecology (6.10)
- Transport (6.11)

6.1.3 These are considered in detail below.

6.2 Land Use

Student Accommodation

6.2.1 Camden's Local Plan (2017) policy H9 (student housing) seeks to "ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds" subject to meeting a range of criteria, including;

(e.) which seeks the student housing to “serve higher education institutions that are accessible from it”

(g.) which states that the Council will support student housing that “has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole; the policy then list locational criteria;

(h). will be accessible to public transport, workplaces, shops, services, and community facilities;

(i). contributes to creating a mixed, inclusive and sustainable community;

(j). does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity.

6.2.2 The London Plan indicates that student housing should be affordable to the student body as a whole.

6.2.3 Chapter 3 of Camden Planning Guidance 2 (Housing) seeks to ensure that student housing contributes to creating mixed and inclusive communities across the Borough and that the housing serves higher education institutions in Camden or adjoining Boroughs. It highlights that the Council expects student housing to be located within walking or cycling distance of the institution(s) it serves or be accessible by public transport services that have existing or committed capacity to accommodate the demand generated.

6.2.4 The Euston Area Plan recognises this part of Euston as an appropriate location for student housing given its access to Bloomsbury university campuses.

6.2.5 The application proposal for student accommodation is in accordance with policy H9 of the Local Plan. The mix of accommodation types (micro studios, studios, and threedios), provides a range of shared accommodation affordable to the student body as a whole, in line with part (g) of policy H9. The site’s highly accessible location, by Euston Station, within walking distance of a number of Higher Education Institutions meets the requirements of policy H9 parts (e) and (h). The site’s location next door to a hotel, other student accommodation buildings, offices and higher education providers meets the criteria of policy H9 part (i) and part (j).

6.2.6 As confirmed at pre application stage, student accommodation is considered to be residential floorspace, therefore the requirements of

policy H2 do not apply and the Council will not seek the inclusion of self-contained housing.

Hotel / Visitor Accommodation

6.2.7 Camden's Local Plan (2017) policy E3 Tourism recognises the importance of the visitor economy in Camden and supports tourism development and visitor accommodation. It expects new, large-scale tourism development and visitor accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn. The policy goes on to set criteria f-i which any new visitor accommodation must meet:

- f. be easily reached by public transport;
- g. provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary;
- h. not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and
- i. not lead to the loss of permanent residential accommodation.

6.2.8 The proposal meets the requirements of policy E3. The site is located in the Euston Growth Area with excellent access to public transport (PTAL 6b). Taxi pick up and drop off will take place on street. The proposal's primary use is student accommodation and will only operate as a hotel outside of term time. In being active all year round, it will complement the mix of uses in the area (hotels, academic intuitions, offices, student accommodation, restaurants). It would not lead to the loss of permanent residential accommodation, as the site is currently vacant and unallocated. The site will have no impact upon residential amenity, as there are no C3 residential uses in the immediate surrounding area. The application proposal full accords with Local Plan (2017) policy E3.

6.2.9 The proposal is also in accordance with London Plan (2016) policy 4.5 visitor infrastructure and policy E10 of the emerging London Plan (2017).

Conclusion on land use

- 6.2.10 The locational characteristics of the site are well suited to both student and hotel accommodation. The site has excellent access to higher education institutions, public transport, and local amenities including bars, restaurants. The site also has excellent access to visitor attractions, national and international rail services and the London Underground. The proposal has no impact on the amenity of existing uses, there are no residential uses in the vicinity, and both hotel and student accommodation uses are already present on Stephenson Way. The proposal will add to the vitality and mix of uses in this highly accessible location.
- 6.2.11 The proposed dual student accommodation and hotel use is in accordance with policies H9 and E3 of the Camden Local Plan (2017). It is also in accordance with policy 4.5 of the London Plan (2016), and policy E10 of the draft London Plan (2017).

6.3 Design

- 6.3.1 The application is accompanied by a detailed Design and Access Statement (tp bennett).
- 6.3.2 The DAS describes the site, its context, constraints and opportunities, and sets out a detailed rationale for the design of the application proposal. This Planning Statement does not seek to repeat this assessment, but set out below are some of the key design issues that need to be considered in determining the application.
- 6.3.3 The Design and Access Statement includes a Views Assessment (tp bennett) which shows the proposal has no impact on local or strategic views.
- 6.3.4 As referred to in section 4.2 and 4.3 of this report, the proposal has been through Camden's pre application and Design Review Panel process and the design has evolved in response to comments made. The resulting proposal has developed through these processes and has been further rationalised to accommodate the proposed dual use student accommodation and hotel uses.
- 6.3.5 The proposal seeks to repair the urban grain, infilling a vacant site, reinstating the well-established building line on Stephenson Way. The height, scale, massing and detailing responds to the surrounding context and comments received at pre application advice and design review panel.
- 6.3.6 The brick finish and regular punched windows respond to the warehouse character of Stephenson Way. The proposed building addresses the street with an active ground floor, which adds much needed activity and natural surveillance to Stephenson Way. The proposed dual use creates an efficient and sustainable building, ensuring it remains active all year round.
- 6.3.7 A key feature of this student accommodation model is the inclusion of en-suite studio bedrooms alongside clustered bedrooms with residents sharing a communal kitchen, WCs and showers. There are also shared facilities and communal space within the building. This type of arrangement provides a choice of lifestyle and budget.
- 6.3.8 Each studio bedroom includes a bed, wardrobe, storage and desk furniture. The unit sizes will vary, with micro studio, standard studio,

wheelchair accessible studio all with private bathroom with sink, WC and shower unit. A 'threedio' has three bedrooms but incorporates shared kitchen, WC and shower rather than an en-suite for each bedroom.

- 6.3.9 There are no surrounding habitable rooms surrounding the site, therefore, a Daylight and Sunlight report is not required.

Conclusions on design

- 6.3.10 The proposal fully accords with Local Plan (2017) policy D1, Design.

6.4 Basement Construction

- 6.4.1 A basement impact assessment prepared by CGL has been submitted in support of the application. The assessment includes a screening and scoping analysis regarding the impact of the basement on groundwater flow, slope / land stability and surface water flow and flooding are, the findings are summarised below.
- 6.4.2 The site is located above the Lynch Hill Gravel Member Secondary 'A' Aquifer. Investigation at 200 Euston Road (40m north west of the site) indicates a groundwater level between 20.03mOD and 20.45mOD. The proposed basement formation level is approximately 20.9mOD for the raft option, or 20.655mOD at pile cap locations in the mini pile option. It is noted the basement formation level for the mini pile option would only locally be at 20.655mOD and would typically be around 21.355mOD. The contiguous mini pile wall in the piled option would not prevent groundwater flow as water would be able to pass through the wall below the basement formation level. Based on the groundwater level at the neighbouring site, the basement is not anticipated to extend below the groundwater table and the impact of the development on the groundwater is expected to be low to negligible.
- 6.4.3 The site and local area is generally flat with a supported excavation to 22.4mOD in part of the site. A small number of semi-established trees are present on site which are expected to be rooted within the Lynch Hill Gravel Member and their removal will not cause significant ground movements. It is anticipated that some degree of ground heave will occur due to excavation for the proposed basement development. However, as neighbouring structures have single storey basements there is no substantial increase in the differential foundation depth caused by the proposed development. It is considered that given the commercial nature of the proposed development, a ground investigation and movement assessment will be carried out at detailed design stage to support the party wall process and the Highways AIP approvals process.
- 6.4.4 The proposed development does not include significant changes to the ratio of hard-standing to soft landscaping and is not anticipated to affect run-off/surface attenuation characteristics. The nearest surface water feature (excluding historical features) is over 1,000m from the site. The impact of the development on surface water flow is anticipated to be negligible.

6.4.5 ***Conclusions on Basement Construction***

6.4.6 The basement impact assessment accords with the requirements of Local Plan (2017) policy B5, Basements.

6.5 Energy

- 6.5.1 The application is accompanied by an Energy Assessment prepared by Thomley and Lumb Partnership. The Energy ASsessment details aspects of sustainable building design relating to energy and carbon emissions of the proposed development, in order to meet the relevant planning policy requirements.
- 6.5.2 Key energy policies from Camden’s Local Plan (2017) include CC1 – climate change mitigation and CC2 – adapting to climate change. The policies require all developments to reduce carbon emissions via steps in the energy hierarchy. They also require all development to demonstrate how London Plan targets for carbon emissions have been met, expecting all developments to optimise resources efficiently.
- 6.5.3 The London Plan (2016) policy 5.2 Minimising Carbon Dioxide Emissions requires new residential buildings (post 2016) to achieve a zero-carbon improvement on the 2010 Building Regulations. The policy also requires non-domestic buildings (post 2016) to achieve the building regulations requirements.
- 6.5.4 Draft London Plan (2017) Policy S12 requires all non-domestic developments to seek to achieve a 35% reduction in carbon emissions against the Part L 2013 baseline.
- 6.5.5 The energy strategy explains how the proposal adopts the “fabric first” design philosophy. This is combined with efficient building services analysis and suitable low and zero carbon (LZC) technology to provide a methodology for achieving a sustainable low energy use development.
- 6.5.6 The proposal adopts the following “be lean” measures;
- Low external envelope u-values
 - Low air permeability
 - Natural ventilation to studio bedrooms
 - Low energy LED lighting
 - Low energy bathroom ventilation system dMEV with trickle ventilation

This facilitates an on-site carbon reduction of 5.6%.

6.5.7 The proposal adopts the following “be clean” measures:

- Provision for future connection to a heat network.

6.5.8 The proposal adopts the following “be green” measures:

- High efficiency CO2 Heat Pump for hot water services.

This achieves a further carbon reduction of 31%.

The Energy Strategy therefore confirms that the proposed development’s carbon emissions will be reduced by more than 35% below the Part L 2013 baseline.

Conclusions on energy

6.5.9 The Energy Assessment has followed the GLA’s energy hierarchy to meet current carbon emissions reduction targets. This process has involved calculation of carbon emissions at each stage of the hierarchy. The scheme achieves an on-site carbon reduction of over 35% against the Building Regulations (2013) Part L baseline. The proposal meets the requirements of Local Plan (2017) policy CC1, CC2, London Plan (2016) policy 5.2, and Draft London Plan S12.

6.6 **Air Quality**

- 6.6.1 The application is supported by an Air Quality Assessment prepared by Hoare Lea.
- 6.6.2 The entire borough of Camden is designated as an Air Quality Management Area (AQMA) for exceedances of the annual mean nitrogen dioxide (NO₂) and 24-hour mean fine particulate matter (PM₁₀) objectives.
- 6.6.3 The assessment finds that the overall operational air quality impacts on the development are insignificant. This conclusion, which takes account of the uncertainties in future projections, in particular for NO₂, is based on the predicted concentrations being below the objectives at all of the receptors.
- 6.6.4 The proposed development is shown to be air quality neutral.

Conclusions on air quality

- 6.6.5 The proposed development is therefore consistent with policy A1 and and CC4 of the Camden Local Plan (2017).

6.7 Noise and Vibration

- 6.7.1 The proposal is supported by a Noise Assessment prepared by EQUUS partnership. It sets out the noise surveys undertaken at the site in order to establish the ambient noise levels.
- 6.7.2 An environmental noise survey of the site was undertaken on the 26 - 27 March 2018 to determine typical prevailing background noise levels at the site over a full 24 hour period.
- 6.7.3 In the daytime the lowest background noise level was 55dB, and during the night the lowest value was 53 dB. Details of the façade construction are yet to be detailed and the Noise Assessment assumes that heavy masonry construction is used for the external wall construction and therefore the principle path of external noise intrusion will be via the windows.
- 6.7.4 Thermal double glazing would be capable of providing sufficient sound insulation to enable the proposed criteria for indoor ambient noise levels to be achieved comfortably. This will ensure that subject to appropriate glazing configurations, acceptable noise levels can be achieved in the student rooms with the windows closed. However, noise levels would of course increase when windows are open. To reduce the need to do this, appropriate alternative means of ventilation are required and the bedrooms have been designed with trickle ventilation and decentralised mechanical ventilation system dMEV to remove excessive internal gains during periods of high ambient temperature.
- 6.7.5 To comply with Local Plan (2017) policy A4 it is required that noise emissions from operational plant should not exceed a limit of 10dB below the otherwise prevailing minimum L background noise level when assessed at the nearest noise sensitive receptor (s) in accordance with BS 4142:2014. Based on the minimum measured background noise levels, this will require that mechanical service installations are designed in accordance with the following acoustic design targets, daytime -45dB, night time 43dB.
- 6.7.6 The above targets should apply to the combined noise emissions of all plant items and are to be achieved at a distance of 1m external to the nearest window of any adjoining noise sensitive property with all plant operating normally.

Conclusions on Noise and Vibration

- 6.7.7 The relevant requirements of national and local planning policy are met, and appropriate design targets for external noise intrusion into residential parts of the development have been put forward. The proposal is therefore in accordance with Local Plan (2017) policy A4.

6.8 **Archaeology**

- 6.8.1 The application is supported by a desk top Archaeological Assessment prepared by CgMs Heritage.
- 6.8.2 In terms of relevant nationally designated heritage assets, the study site does not lie within the vicinity of a World Heritage Site, Scheduled Monument, Historic Battlefield or Historic Wreck site.
- 6.8.3 In terms of relevant local designations the study site does not lie within an Archaeological Priority Area.
- 6.8.4 The study site can be considered likely to have a generally low archaeological potential for all past periods of human activity.
- 6.8.5 Past-post depositional impacts within the study site are considered likely to have had a severe negative archaeological impact.

Conclusions on archaeology

- 6.8.6 The assessment finds that on the basis of the available information, no further archaeological mitigation measures are required.

6.9 **Drainage and SUDS**

- 6.9.1 Camden Local Plan (2017) policy CC3 - Water and Flooding requires development to:
- a. incorporate water efficiency measures;
 - b. avoid harm to the water environment and improve water quality;
 - c. consider the impact of development in areas at risk of flooding (including drainage);
 - d. incorporate flood resilient measures in areas prone to flooding;
 - e. utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
 - f. not locate vulnerable development in flood-prone areas.
- 6.9.2 The application is accompanied by a Surface Water Drainage Strategy prepared by Lanmor Consulting. It considers the proposed drainage regime for the site and sets out the drainage strategy for the development including discharge rates and any requirements for attenuation.
- 6.9.3 The Thames Water Sewer Records show there is an existing combined sewer in Stephenson Way to the north. The site is currently used as a car park. There is a manhole within the site's boundary however it is unclear where this sewer drains to or what it caters for. Therefore, both foul and surface water from the site require new networks to drain the application site.
- 6.9.4 A new network of foul drainage will be provided to serve the new building. The peak flow rate for the 78 units in the proposed building is estimated to be between 5 and 6 l/s.
- 6.9.5 Foul water will be collected through a series of pipes from the units and discharged into the existing Thames Water combined sewer towards the north of the site on Stephenson Way. The proposals will allow for foul water drainage to discharge to the local drainage network via a new network, subject to a S106 application with Thames Water.
- 6.9.6 The strategy finds that the only viable option for the discharge of the surface water will be to attenuate flows and restrict the discharge into the existing combined network. MicroDrainage calculations for the attenuation tank have been provided to show that it can cater for a

storm event with a return period of 1 in 100 years plus 40% climate change without causing flooding on site or in the surrounding area.

Conclusions on drainage and SUDS

- 6.9.7 The surface water drainage strategy report has demonstrated that the drainage requirement for the development can be provided for in accordance with the Sustainable Drainage Hierarchy, in line with the requirements of Local Plan (2017) policy CC3.

6.10 **Contamination**

6.10.1 The application is accompanied by phase 1 desktop contamination assessment prepared by MLM group.

6.10.2 The desk study and site reconnaissance have identified potential sources of contamination as follows:

- Made ground from previous construction and demolition (on site)
- Historic industries (off site, surrounding area)
- Historic garage (36m west)

6.10.3 Potentially complete pollutant linkages have been identified on site. Therefore the following elements of investigation are advised:

- Ground investigation to establish ground conditions and the presence of soil or groundwater
- contamination
- Investigation should provide site coverage
- Sample testing should include metals, PAHs, TPHCWG and asbestos
- Monitoring wells and an appropriate number of visits to confirm presence or absence of ground gas

6.10.4 Overall, no significant contamination has been identified. Further investigations are recommended, as set out above, and it is anticipated that will be addressed by planning condition.

Conclusions on contamination

6.10.5 The application proposal would not give rise to contamination or a deterioration in land, soil or water quality and thereby accords with Local Plan (2017) policy A1.

6.11 **Ecology**

- 6.11.1 The application is accompanied by a Preliminary Ecological Appraisal prepared by PJC consulting.
- 6.11.2 Camden Local Plan (2017) policy A3 Biodiversity seeks to protect and enhance sites of nature conservation and biodiversity. The Council will:
- b. grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;
 - c. seek the protection of other features with nature conservation value, including gardens, wherever possible;
 - d. assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;
 - e. secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;
 - f. seek to improve opportunities to experience nature, in particular where such opportunities are lacking;
 - g. require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species;
 - h. secure management plans, where appropriate, to ensure that nature conservation objectives are met.
- 6.11.3 The nearest non-statutory designated sites are Regent’s Park (950m) a SINC of Metropolitan importance. Park Square Gardens (730m) a SINC of Borough Grade II importance. St George’s Gardens (740m) a SINC of Local Importance. St James’ Gardens (280m) a SINC of Local Importance. Russell Square (770m), a SINC of local importance. Gordon Square, 350m, a SINC of Local importance.
- 6.11.4 The survey recommends ecological mitigation through the provision of bird boxes post development. Due to the presence of a Tree of Heaven on site, habitat clearance works should be undertaken outside of the main nesting bird season. Should this not be possible, all trees and buildings must be inspected by an ecologist to determine the presence / absence of nesting birds immediately prior to clearance.

- 6.11.5 Due to the presence of young buddleja and a recently felled Tree of Heaven on the site, a specialist contractor should be employed where necessary to aid with the removal of LSI plants from the site in order to prevent their spread.

Conclusions on ecology

- 6.11.6 The phase one habitat survey sets out the mitigation measures required in accordance with Camden Local Plan (2017) policy A3.

6.12 Transport

- 6.12.1 The proposal is supported by the submission of a Transport Assessment prepared by Robert West. The Transport Assessment summarises the existing site usage and models the proposed trips anticipated from the new development.
- 6.12.2 The application is proposed as 'car free' which is consistent with Policy T2 in the Camden Local Plan.
- 6.12.3 It is noted that should any residents, or visitors have a physical impairment and require the use of a car, they will be expected to use on-street parking. There are two disabled bays available on Stephenson Way, approximately 20m from the building entrance and a further disabled bay is available on North Gower Street (approximately 70m away).
- 6.12.4 The London Plan cycle parking standards for land use C2 (student accommodation) require a minimum of one cycle parking space per two beds for long-stay cycle parking.
- 6.12.5 As the development is for 78 beds, 39 long-stay spaces and two short-stay cycle parking spaces will be required.
- 6.12.6 The 39 long-stay spaces will be provided within a secure store in the basement. The basement can be accessed via the vehicular access ramp to 222 Euston Road. A small set of stairs with bike ramp will allow access to the cycle storage area, which is set down from the basement access door.
- 6.12.7 It is proposed that delivery and servicing activities will be undertaken from Stephenson Way. This is consistent with the servicing strategy for other properties located along the street. It is noted the existing single yellow lines along the carriageway prevent stopping of heavy vehicles (5T, or more) 6:30pm-midnight and midnight-8am. It is therefore proposed that delivery and servicing activities will be managed to occur outside of these times. The vehicles will pull up on the single yellow lines, without blocking the movement of other vehicles along the carriageway.
- 6.12.8 The refuse store is located within the basement level of the development. A platform lift will be provided to transport the refuse containers to the bottom of the vehicular ramp. From the bottom of the

ramp the refuse and recycling containers will be dragged out to street level for collection by a member of the site management team.

- 6.12.9 Vehicle tracking analysis has been undertaken to confirm that vehicular access to 222 Euston Road can be maintained. The drawing, provided in Appendix C of the transport assessment, shows that a large car can access and egress the servicing area using the vehicular ramp, without conflict.
- 6.12.10 It is recognised that additional delivery trips will occur when students will move in and out of the building at the start and end of the academic year. Future residents will be advised to use small vans and plan these activities at suitable times of day. This activity will be limited to a few days of the year and will be managed by the management team accordingly, with a strategy to plan these activities to be provided within the travel plan.
- 6.12.11 The proposed development is expected to produce trips by residents, staff and visitors. It is anticipated that the majority of trips will be undertaken using public transport modes, which is consistent with the highly accessible nature of the site.
- 6.12.12 Limited vehicle trips (20 two-way trips) are anticipated to be generated by the development, most of which would likely be taxi or private hire trips. This is consistent with the development being located in an area with CPZ restrictions.

Conclusions on Transport

- 6.12.13 The proposal meets the requirements of Local Plan (2017) policy T1 and T2.

7 CONCLUSIONS

- 7.1 This Planning Statement supports an application made by Churgate Ltd for the redevelopment of a vacant site on Stephenson Way (Land to the rear of 222 Euston Road) for the following proposal:

Erection of a seven-storey building plus basement for dual student accommodation (C2) and hotel (C1) use with 78 rooms of accommodation on the upper floors with shared amenity space at ground and sixth floor level, plus basement level storage. Retention of the vehicular easement from Stephenson Way to the rear of 222 Euston Road.

- 7.2 The proposal has been subject of detailed pre-application discussions with LBC planning and design officers, as well as Camden's Design Review Panel process. A public consultation exercise has also been conducted, and is summarised in the statement of community involvement.

Land use

- 7.3 The locational characteristics of the site are well suited to both student and hotel accommodation. The site has excellent access to higher education institutions, public transport, and local amenities. The site also has excellent access to visitor attractions, national and international rail services and the London Underground (PTAL 6b).

- 7.4 The proposal places no impact on the amenity of existing uses, there are no residential uses in the vicinity, and both hotel and student accommodation uses are present on Stephenson Way. The proposal will add to the vitality and mix of uses in this highly accessible location. The proposal fully accords with Camden Local Plan (2017) policies H9 (student accommodation) and E3 (Visitor Accommodation).

Design

- 7.5 As referred to in section 4.2 and 4.3 of this Planning Statement, the proposal has been subject of Camden's pre application advice and Design Review Panel process. The proposed design has developed in response to comments made. Refinements including additional windows to provide light into the corridors, and internal rearrangement, has maximised the amenity value of the spaces at basement and sixth floor level, and improved the ground floor communal spaces, so that the whole ground floor level has an open, communal function, creating an active frontage to Stephenson Way.

- 7.6 The design has developed and rationalised further, with input from student accommodation and hotel operators, to ensure that a robust building suits the needs of both end users. The increased provision of shared, communal spaces reflects a growing demand in both the student and hotel markets for increased social interaction and flexible working spaces.
- 7.7 The proposal seeks to repair the urban grain, infilling a vacant site, reinstating the well-established building line on Stephenson Way. The proposed height, scale, massing and detailing responds to the surrounding context and comments received through pre application advice and the design review panel.
- 7.8 The brick finish and regular punched windows respond to the warehouse character of Stephenson Way, addressing the street with an active ground floor which adds much needed activity and natural surveillance to the street.
- 7.9 The proposed dual use creates an efficient and sustainable building, ensuring it remains active all year round.
- 7.10 The proposal fully accords with Local Plan (2017) policy D1, Design.

Energy

- 7.11 The energy Strategy has followed the GLA's energy hierarchy to ensure the carbon emissions reduction targets have been met. This process has involved calculation of carbon emissions at each stage of the hierarchy using IES VE Compliance DSM. Achieving an on-site carbon reduction of over 35% against the Building Regulations (2013) Part L baseline. The proposal meets the requirements of Local Plan (2017) policy CC1, CC2, London Plan (2016) policy 5.2, and Draft London Plan S12.

Transport

- 7.12 The proposal is car free, with 39 long-stay, secure cycle parking spaces within the basement. The basement can be accessed via the vehicular access ramp to 222 Euston Road.
- 7.13 All delivery and servicing activities will be undertaken from Stephenson Way, consistent with the servicing strategy for other properties located along the street.

- 7.14 The proposal meets the requirements of Local Plan (2017) policy T1 and T2.

Other Technical Matters

- 7.15 The proposal meets national, regional and local planning policy requirements with regard to air quality, noise and vibration, archaeology, drainage and SUDS, contamination and ecology.

Overall Conclusion

- 7.16 On balance, therefore, the application proposal accords with all relevant national and local policies.
- 7.17 In terms of the overall tests set out in the NPPF, the proposal is considered sustainable development for which there is a presumption in favour of permission being granted.

APPENDICES

- Appendix 1: A. Community Consultation Letter

APPENDIX 1 PUBLIC CONSULTATION LETTER

PUBLIC CONSULTATION APRIL 16th 2018

Stephenson Way - Planning application for student accommodation (78 beds) with hotel use during summer months



Introduction

TP Bennett and our client Oakwood International Investment Corp are to submit a planning application to develop the vacant site on Stephenson Way, shown above.

Proposal Summary

The proposal seeks to develop the vacant site on Stephenson Way, retaining the vehicular easement through the site to access the rear of 222 Euston Road. The height, scale, and mass of the proposal (7 storeys plus basement) responds to the surrounding context, built form and building heights. The proposed building fronts Stephenson Way and creates an active frontage to the street, with 78 student rooms provided on the upper floors. During the summer months, the building will operate as a hotel.

This consultation exercise provides you as a neighbour with the opportunity to comment on the proposal, prior to submission of a planning application. If you have any queries, please contact us using the details at the bottom of the page.

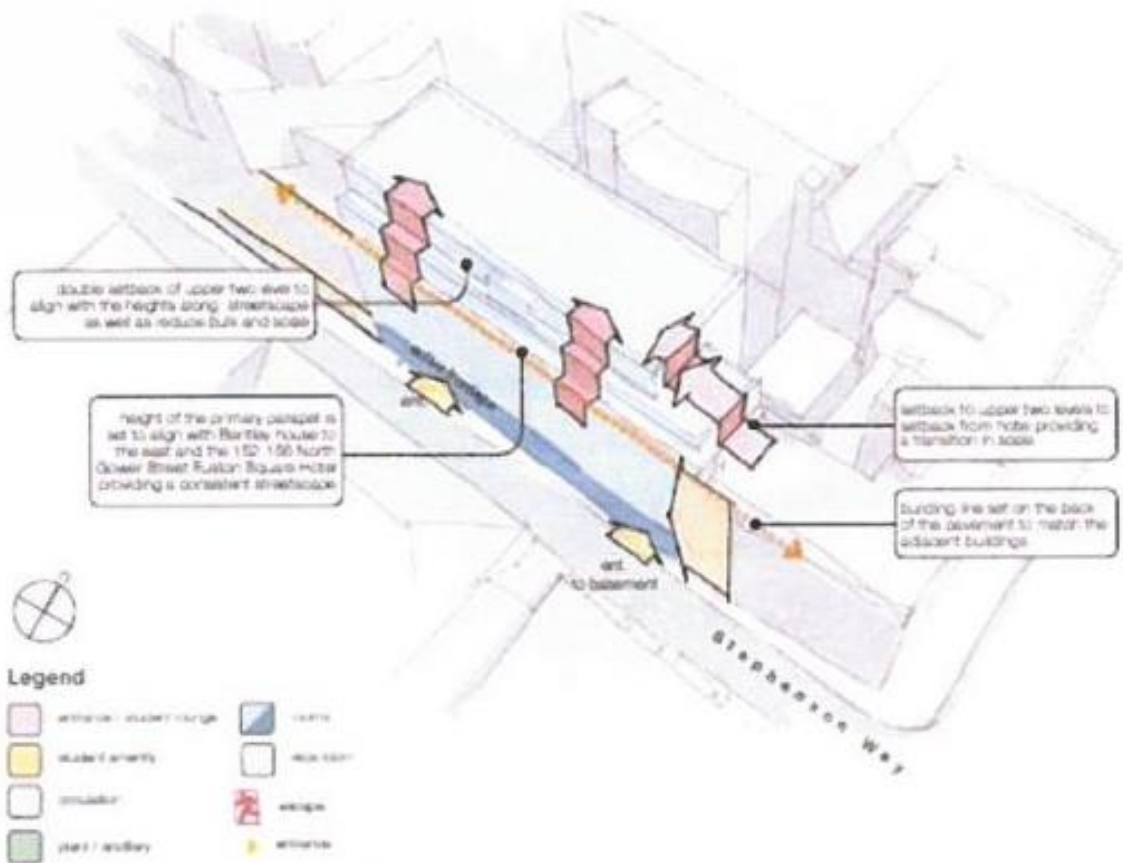
Contact Details

Please direct your enquiries to:

Email: James.Buckley@tpbennett.com

Tel: 020 7208 2410

Proposed Design



Proposed Stephenson Way Elevation

