



**Date:** 24<sup>th</sup> October 2017  
**Our ref:** 2017/4860/PRE  
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Dear James,

**Site address:** Land to the rear of 210 Euston Road, adjacent to 222 Euston Road, fronting Stephenson Way, London NW1 2DA

**Proposal:** Development of site to provide 92 student apartments over 2765sqm GEA

Thank you for submitting a pre-application enquiry for the above site, received on 25<sup>th</sup> August 2017. With the enquiry, the following documents have been submitted:

- tp bennett Pre-application document dated August 2017

The comments below are based on the document above and the pre-application meeting discussions held onsite on 25<sup>th</sup> September 2017. This letter sets out a detailed note of the principal issues regarding the proposal.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

## Proposals

Pre-application advice is sought on the erection of an eight-storey building to create 92 student rooms. These would provide a mix of micro studios, twodios and threedios and shared facilities. The new floorspace would equate to 2765sqm of C2 residential institution accommodation.

## Site description

The site contains a vacant, gap site of 406sqm. The site currently provides vehicular access to number 210 Euston Road down the existing ramp with six car parking spaces.

The site is not located within a Conservation Area. Stephenson Way 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.

The site is highlighted as a site with potential to have contaminated land.

The site is bounded to the west by a hotel at 152-156 North Gower St. To the east is 222 Euston Road which fronts Euston Road but extends to Stephenson Way. It is an office building, part of UCL – the Farr Institute of Health Informatics Research. 210 Euston Road is an office building located to the south of the site.

### **Relevant planning history**

The relevant planning history is as follows:

#### 210 Euston Road

Planning permission granted on 20/11/1969 for erection of an additional storey (seventh floor) for office use at No. 210, Euston Road (ref 7763)

Planning permission was granted on appeal on 30/03/1989 for the 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)

Planning permission was granted on 02/07/1991 for the 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).

#### 222 Euston Road

Outline planning permission was granted on 01/07/1993 for the 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)

Outline permission was granted on 13/12/1990 for the 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

Planning permission was granted on 03/12/2013 for the 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)

### **Relevant policies and guidance**

The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Plan adopted in July 2017, The London Plan 2016 and the NPPF (2012).

The following policies of the Camden Local Plan are relevant:

- 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;  
 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.

The Council is currently developing a Planning Brief to provide guidance for the development above and around Euston station and tracks, which will build on the vision set out in the Euston Area Plan (adopted in 2015).

The following documents also provide relevant guidance for this proposal:

Camden Planning Guidance 1 – Design (2015);  
 Camden Planning Guidance 2 – Housing (2016);  
 Camden Planning Guidance 3 – Sustainability (2015);  
 Camden Planning Guidance 4 – Basements and lightwells (2015);  
 Camden Planning Guidance 6 – Amenity (2011);  
 Camden Planning Guidance 7 – Transport (2011)  
 Camden Planning Guidance 8 – Planning Obligations (2015)

### **Planning Considerations**

The following issues are considered to be material considerations:

- Principle of land use;
- Design and scale;
- Standard of accommodation
- Basement construction
- Amenity Impacts;

- Climate change mitigation and sustainability
- Air Quality
- Transport and management
- Refuse and recycling
- Health and wellbeing
- Safety and Crime Prevention
- CIL

### Principle of land use

Policy H9 (student housing) of the Camden Local Plan 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”. The policy lists criteria a-j which must be met. In particular, criterion (e.) which seeks the student housing to “serve higher education institutions that are accessible from it” and criterion (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 goes on to state that “where proposed student housing development is not robustly secured as student housing that provides accommodation affordable to the student body in accordance with criterion (g), the Council will expect the development to provide an appropriate amount of affordable housing for general needs having regard to Policy H4 Maximising the supply of affordable housing”.

The London Plan indicates that student housing should be affordable to the student body as a whole. 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. The Council will seek to ensure:

- that the accommodation is operated directly by a Camden based (or adjoining borough) HEFCE funded higher education institution; or
- a nominations agreement is in place with a specific HEFCE funded institution(s) which ensures that the institution(s) controls admission to the accommodation. In this regard it is important for private providers to have early discussions with HEFCE institutions to ensure the accommodation is designed and built to meet their needs and requirements.

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

Student housing proposed in accordance with policy H9 of the Local Plan is considered to be residential floorspace and therefore the requirements of policy H2 do not apply and the Council will not seek the inclusion of self-contained housing in such a proposal.

CPG2 states that the Council will resist schemes that have not identified which institution the students occupying the proposed accommodation will attend. No details of the potential end user of the student block have been submitted at this stage. It is recommended that at application stage an institution will have signed up to providing the student accommodation or providing affordable accommodation for students. This needs to be considered at an early stage as it might influence the layout and type of accommodation provided (to meet the needs of the institution) or to make the units affordable would then also influence design.

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

### Design and scale

The NPPF (paragraphs 56 and 57), the London Plan (Policies 7.1 to 7.8) and Camden's policy D1 and Camden Planning Guidance 1 (CPG1) place great emphasis on the importance of good design. CPG1 seeks "excellence in design" in Camden. Policy at all levels requires buildings, streets and spaces to respond in a manner, which promotes inclusive and sustainable development and contributes positively to the relationship between urban and natural environments and the general character of the location.

There are no objections to the principle of the proposed building on the site as it would utilise an underused/vacant site in a Central London location and remove the antisocial behaviour and littering problems on the site. The proposed building would front Stephenson Way and comprise eight storeys with the top two storeys set back with landscaping at the front of seventh floor level.

As discussed on site, a number of revisions are required in order to improve the appearance of the building. The proposed height is considered excessive in the context of the adjoining hotel building on the corner of North Gower Street. In order to reduce the bulk and mass of the proposed building it is recommended that the two set back upper storeys be removed. Whether a further set back storey is possible at roof level will depend on its impact on views agreed on site in particular from North Gower Street and to the southwest on Euston Road. This needs to be further demonstrated at application stage or by a follow-up pre-application enquiry.

The height of the ground floor should be raised in order to be commensurate with the student housing block at the rear of Bentley House. The parapet height should also be coordinated with the parapet height at the rear of Bentley House and mirror the set back storey to the student block at the rear of Bentley House.

The vehicular entrance should be differentiated from the remainder of the frontage and there needs to be a change in the composition of the front elevation to create a stronger solid to void ratio and greater depth with the provision of deep punched windows.

### Standard of the accommodation

The proposed student accommodation would be arranged either in cluster apartments with communal facilities, or studio apartments with integral kitchenettes.

Chapter 3 of CPG2 (Housing) gives detailed guidance and requires 10% of student bedrooms to be wheelchair accessible.

CPG2 also expects student housing developments to include a range of clustered study bedrooms with some shared facilities and double and single units. The provision of a variety of layouts will also allow for greater flexibility for conversion to permanent self-contained housing if in future the building is no longer needed as student accommodation.

It is advised that you reconsider where the staircore is located in order for the student units to have the maximum amount of light and outlook.

The Mayor's Housing SPG advises that the nationally described space standard and the optional Building Regulations do not apply to specialist forms of housing like student housing. For new student housing schemes provided by HEFCE institutions, the Council will expect development to comply with the Accreditation Network UK (ANUK) 'Code of Standards for Larger Developments' (<http://www.anuk.org.uk/LargeCode/Introduction.asp>). Other student housing schemes will be expected to comply with the Council's HMO standards.

### Basement

As basement excavation is proposed, a Basement Impact Assessment should be submitted at application stage in accordance with the provisions of policy A5 and Camden Planning Guidance (CPG4). These analyse the impact the proposed development would have structurally upon nearby premises, the land and the impact upon the water environment. The BIA should include all details of excavation, construction methods (and Burland category assessment) and mitigation methods to address the above should be detailed accordingly.

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

The application site is identified as a potential contaminated site which should be investigated and addressed in the BIA.

### Impact on amenity of neighbours

Policy A1 seeks to protect the quality of life of occupiers and neighbours. A daylight/sunlight report would be required in support of any future planning application to

demonstrate the impact of the proposal in terms of daylight and sunlight for any surrounding residential occupiers.

A Noise Assessment would need to be submitted at application stage. The assessments would need to fully consider the impact of the proposals on existing neighbouring residential properties on Stephenson Way and North Gower Street together with the impact of traffic and road noise on future occupiers.

A Student Management Plan will also be required as part of any planning application submitted setting out full details of how the accommodation would be managed to minimise the impact on the amenities of neighbouring properties. The Council would seek to secure this by S106 Legal Agreement.

### Climate change mitigation and sustainability

Policy CC1 (Climate change mitigation) states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Policy CC2 (Adapting to climate change) states that the Council will require development to be resilient to climate change. All developments should adopt appropriate climate change adaptation measures where appropriate and the applicant is advised to explore sustainable design and construction methods. All major developments are required to assess the feasibility of connecting to an existing decentralised energy network or where this is not possible establish a new network. Major developments such as the proposed development will be required to install appropriate monitoring equipment to ensure that the Council can monitor the effectiveness of renewable and low carbon technologies.

New developments in Camden will be expected to be designed to minimise energy use and CO<sub>2</sub> emissions in operation through the application of the energy hierarchy. An energy statement will be required to be submitted at application stage indicating how the energy hierarchy has been applied to make the fullest contribution to CO<sub>2</sub> reduction. All new residential development will also be required to demonstrate a 19% CO<sub>2</sub> reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy) and developments of more than 500sqm of any gross internal floorspace will be expected to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation. In addition all major developments will also be expected to demonstrate how relevant London Plan targets for CO<sub>2</sub> reduction, including targets for renewable energy, have been met.

Policy CC3 seeks to ensure that development does not increase flood risk in the Borough and requires developments to incorporate water efficiency measures and utilise SUDS. The supporting text of this policy states that major developments including student housing, should include a grey water and rainwater harvesting system and all developments are required to adopt appropriate climate change adaptation measures such as incorporating bio-diverse roofs, and measures to reduce the impact of urban overheating. All residential new build schemes are encouraged to use the Home Quality Mark and Passivhaus design standards. Residential developments will be expected to meet the water use standard of 110 litres per person per day (including 5 litres for external water use).

The London Plan policy 5.2 requires major developments to achieve 35% reduction in CO2 emissions beyond the Part L 2013 building regulations by following the energy hierarchy. Any emissions that cannot be met on-site can be offset through a financial contribution to secure delivery of carbon dioxide savings in the borough. As of October 2016, the contribution figure is £1,800 per tonne of carbon (over 30 years) as per the figure tested for the London Plan's Viability Assessment.

The above measures should be demonstrated through the submission of a sustainability and energy statement.

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

Developments are required to utilise SUDS in accordance with policies CC2 and CC3 of the Local Plan following the drainage hierarchy (as set out in paragraph 8.57 of the Local Plan). The Council will also require the development to reduce the pressure on the combined sewer network and the risk of flooding by sustainable urban drainage systems (SUDS). The volume and rate of run-off from heavy rainfall can be reduced through the installation of green and brown roofs, pervious paving and detention ponds or tanks. A Surface Water Drainage Pro-forma (found [here](#)) will need to be submitted as part of any application. SUDS strategies should be designed in accordance with NPPF policy (and written Ministerial Statement) and London Plan policy 5.13 (SUDS hierarchy) to reduce run-off rates to greenfield rates. Where reasonably practicable, run off volumes should be constrained to greenfield run off volumes for the 1 in 100 year 6 hour event.

### Air Quality

The site is located in the Clear Zone Area - Central London Area. An Air Quality Assessment (AQA) is required to be submitted at application stage due to the location and size of the site. Further details can be found in policy CC4 of the Camden Local Plan. The Air Quality Assessment should set out full details of any mechanical ventilation required and assess air quality for future occupiers. It must outline the predicted and forecast pollutant concentrations at the proposed development and the planned mitigations. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact.

### Transport and management

Due to the size of the proposed development it is expected that a Transport Assessment be submitted at application stage in accordance with guidance set out in Camden Planning Guidance 7 (Transport) and policy A1 of the Camden Local Plan.

The Council will expect the proposed student housing to be designed to prioritise walking and cycling, with accessible and secure cycle parking facilities provided in accordance with Policy T1 "Prioritising walking, cycling and public transport" and the minimum requirements of the London Plan. Table 6.3 in the London Plan lists the minimum number of cycle parking spaces required for the following uses:

- Student accommodation - Long-stay: 1 space per 2 beds and short stay: 1 per 40 units.



All cycle parking must be installed as per our planning guidance set out within Chapter 9 of CPG7.

The site has a PTAL of 6b and is well served by public transport being located within walking distance of Euston and Euston Square underground and overground stations and within close proximity to local bus stops. In order to ensure that students, staff and visitors do not contribute to parking stress or add to existing traffic and environmental problems in the local area (e.g. traffic congestion, road safety and air quality), the development would be secured as 'car free' through a S106 legal agreement in accordance with policy T2 of the Camden Local Plan 2017.

The summary page of Local Plan A1 states 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.' The proposed works could lead to damage to the footways and carriageway directly adjacent to the site on the public highway. Camden would need to undertake highway remedial works following completion of the proposed development and a financial contribution for highway works should be secured as a Section 106 planning obligation. A cost estimate will be requested from our Highways Delivery team at full planning application stage.

Due to the nature of the proposed development, a Construction Management Plan (CMP) would be required, in line with policy A1 (Managing the impact of development). The CMP would need to identify the potential impacts of the construction phase and indicate how any potential negative impacts will be mitigated and will be secured via a section 106 agreement. The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A draft document would be required on application submission. Please use the link for the Council's pro forma:

<https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/construction-management-plans.en>

A financial contribution of £7564.50 would need to be secured to cover the costs of reviewing the Construction Management Plan. This would also need to be secured by a Section 106 planning obligation if planning permission is granted.

Policy A1 of the Local Plan seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links with appropriate mitigation measures in place. As such, a draft Travel Plan should be submitted setting out measures to promote the use of sustainable transport by students and future visitors within the development. Further guidance can be found in Camden Planning Guidance 7 (Transport).

Due to the location of the site and nature of the proposed use, a Delivery and Servicing Management Plan should be prepared in accordance with policies A1 and T4 of the Camden Local Plan and guidance within CPG7.

Refuse and recycling

Policy CC5 of the Local Plan provides advice regarding refuse and recycling storage. Any future application should fully detail where refuse and recycling would be stored and what the strategy would be for collection. This would be set out within the Delivery and Servicing Management Plan.

### Health and wellbeing

In accordance with policy C1, the Council will require the submission of a Health Impact Assessment (HIA) for major developments.

### Safety and Crime Prevention

Policy C4 is relevant with regards to secure by design. It would need to be demonstrated as part of any future application that the proposal was safe and secure and met the requirements of 'Secured by Design'. It is recommended that guidance be obtained from the Metropolitan Police Crime Prevention Design Advisor prior to any planning application being submitted.

### CIL

At the present time development would be subject to the Mayor of London's CIL and Camden CIL given that more than a 100sqm increase in floorspace is proposed. Please be aware that the Mayor is reviewing the CIL schedule and has indicated that a new schedule may be in place in 2019.

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

### Planning Obligations

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

- The proposed Student Housing being formally tied in to a Higher Education Funding Council for England Institution by way of a nomination agreement
- Delivery and Service Management Plan
- Student Management Plan
- A car free clause where future occupants should be made aware they are not entitled to on-street parking permits;
- A financial contribution to cover the cost of highway works in the general vicinity of the site;
- A Construction Management Plan (CMP) in the form of Camden's pro-forma found at:

<https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/construction-management-plans.en>

The Section 106 agreement shall state that the CMP shall be approved prior to any works starting on site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority;

- A one off financial contribution of £7564.50 to cover the costs of reviewing the Construction Management Plan;
- Renewable Energy Plan.

### Community Engagement

You are encouraged to undertake public consultation, including with local groups, before the submission of any planning applications. The details of any community engagement should be provided within a Statement of Community Involvement.

### Conclusions

The principle of a student housing development on the site is supported within this sustainable location close to local services and amenities. This is subject to satisfying all the requirements of policy H9 and chapter 3 of CPG2 in terms of linking the student housing to a service provider and higher education facility.

As detailed above the design of the proposal needs some work in terms of reducing the height and scale and revising some details before it would be considered acceptable at application stage.

Any planning application submitted would need to demonstrate that the proposal would have no adverse impact on residential amenity and highway safety as set out above.

### Planning application information

Information to be submitted with any planning application (not exhaustive)

- Completed and signed planning application forms for Full Planning Permission;
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Planning Statement
- Design and Access Statement(s)
- Affordable Housing Statement
- Viability Report if not providing policy compliant affordable housing
- Daylight/Sunlight Assessment
- Transport Statement
- Crime Impact Assessment
- Townscape, Heritage and Visual Impact Assessment
- Air Quality Assessment
- Statement of Community Involvement
- Energy Statement
- Sustainability Statement
- Student Management Plan
- Basement Impact Assessment

- Details of refuse and recycling storage
- Noise (and Vibration) Report and details of necessary attenuation measures
- Draft Construction Management Plan
- Statement of Community Involvement

Please note that failure to provide all of the above information with any planning application is likely to lead to delays in the application being validated. Please note, this list is not exhaustive, and other documents may be required to validate the application if they are considered necessary at a later date.

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Rachel English (0207 974 1343)

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

Yours sincerely,

Rachel English

Senior Planning Officer  
Planning Solutions Team