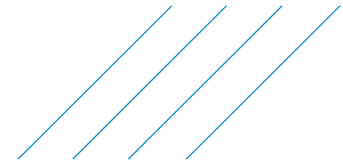




## Technical Note

Project:	HS2		
Subject:	Townscape and Visual Review: 93-103 Drummond Street, London		
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Date:	13/09/2018	Project No.:	5164548.061
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# 1. Sunlight and Daylight Review

## 1.1. Introduction

The purpose of this review is to comment on the submission of the planning application for 93-103 (Odd) Drummond St and 63 Cobourg St London NW1 (2018/2397/P, 2018/2398/P, 2018/2399/P, 2018/2400/P and 2018/2401/P). The documents that have been reviewed to assess whether the daylight and sunlight conditions for the proposed development are:

- Detailed Daylight and Sunlight Report – Proposed development of 93-103 (odd) Drummond Street and 63 Cobourg Street, London Nw1 (10 storey tower) January 2018 -GVA.
- Site plan 2049-01-DR-001 rev P01 -CZWG.

The following aspects have been excluded from this report:

- On site surveys / visits to test validity of written statements on existing properties and current usage.
- Re-modelling of the proposed building and existing surrounding buildings to check the validity of the results of the daylight model.

The daylight and sunlight report identifies two good practice documents that have been utilised for the review of daylight/sunlight implications of the proposed development:

- BRE Site Layout Planning for Daylight and Sunlight a good Practice guide 2<sup>nd</sup> edition 2011.
- BS 8206-2 Code of practice for daylighting.

Both of these documents are adequate for the evaluation of daylight and sunlight and we agree with their use as the right benchmarks for this report.

The Camden Local Plan Policy A1 states that “Protecting amenity is a key part of successfully managing Camden’s growth and ensuring its benefits are properly harnessed. The Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.

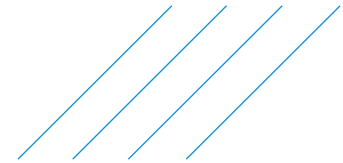
Policy A1 continues that “a development’s impact upon visual privacy, outlook and disturbance from artificial light can be influenced by its design and layout. These issues can affect the amenity of existing and future occupiers. The Council will expect that these elements are considered at the design stage of a scheme to prevent potential harmful effects of the development on occupiers and neighbours. Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.

Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment’s Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011). Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.”

The London Plan Policy 7.6 states that “buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential building, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.”

## 1.2. Methodology of the Detailed Daylight and Sunlight Report (January 2018)

There is very little description of the methodology utilised within the Detailed Daylight & Sunlight Report. It would be expected that a statement about the calculation process, whether computer software was used, and the source of the third-party 3D model identified in the report would be provided in order that the results could be validated.



It is noted that the 3D model was provided by the architects (CZWG) for the project but it appears to be a commercially sourced model. As such, the ultimate source, level of detail, accuracy and date have not been identified. The position, size and height of windows on receptor properties is not identified in the report, nor are the room uses and layouts identified.

It therefore makes it difficult for third parties to comment whether the assessment of the sensitive receptors for both current daylight conditions and proposed daylight conditions has been correctly evaluated. It is the variance of these existing and proposed values for the three criteria of Vertical Sky Component (VSC) % Average Daylight Factor (ADF) and No-Sky Line area of rooms against published values which demonstrates compliance. It should be noted that the three criteria listed above pertain to daylight.

The Annual Probable Sunlight hours (APSH) is referred to Section 4 of the report but is not covered in the final results tables. We disagree with the statement in paragraph 4.13 of orientation of the properties on Cobourg Street the windows facing the development, which is around NE-ENE, and as such would be receiving some early morning sunlight and therefore a check of APSH calculations should have been undertaken. We have currently no method of checking the exact orientation of the windows with the data available.

There is no statement as to how the sensitive receptors have been chosen. Whilst we agree with the choices in principle, there are several properties which might be considered marginal such as the Ibis Hotel and Network rail offices on Melton Street, and would usually be considered sensitive as occupied spaces. We would have expected a statement as to why they have not been considered.

We would have expected to have seen a table or list identifying characteristics of the sensitive receptor properties. We note the statement in paragraph 4.17 regarding usage and room layouts being assumed and we would have expected a clear list of assumptions to be identified within the report. The assumptions could then be assessed as being either reasonable or not.

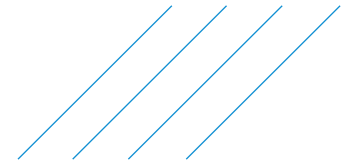
### 1.3. Conclusions

The report has been undertaken in the correct manner and compliance has been stated. Our review does not question this statement as being untrue, but we suggest that the current depth of the report does not prove the assertion of compliance with the benchmark values adequately.

The statement about the orientation of the Cobourg Street properties being wrong does not invalidate the daylight results but does lead the reviewer to have a level of doubt about the validity of all the results.

We need to understand the level of assumptions and be provided with more detail on the calculation procedure to understand the calculation tolerances that should be applied. This lack of information again influences the level of surety in the accuracy of the results.

With regards to the items identified above, we would recommend that HS2 seeks additional clarity in the report information to back up the report's conclusions. This could then be reviewed further. If access to the original calculation model from GVA was provided, a full investigation of the daylight requirements additional survey and calculation could be undertaken. These considerations form a key part of the decision-making process for planners and without this verifiable information, it is considered that an informed and evidence-based judgement of these applications is not possible.



## 2. Townscape and Visual Review

### 2.1. Introduction

In May 2018, five planning applications (2018/2397/P, 2018/2398/P, 2018/2399/P, 2018/2400/P and 2018/2401/P) were made by Canfield Freehold Ltd to Camden Council for redevelopment of existing properties at 93-103 Drummond Street into student accommodation. The five planning applications comprise of essentially the same building with a varying number of storeys (2018/2397/P six storeys, 2018/2398/P seven storeys, 2018/2399/P eight storeys, 2018/2400/P nine storeys and 2018/2401/P ten storeys) (referred to within this note as the proposed development).

This document provides a high-level review of the potential townscape and visual impact of the proposed development and has followed the principles contained within the Guidelines for Landscape and Visual Impact Assessment, 2013 (Landscape Institute and Institute of Environmental Management & Assessment).

Within GLVIA, townscape is defined as the character and composition of the built environment including the buildings and relationships between them, the different types of urban open space, including green spaces, and the relationship between buildings and open spaces. Visual amenity is defined as the overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.

### 2.2. Policy background

In the context of a no scheme world, documents that refer to HS2 are discounted and therefore not referred to in this report.

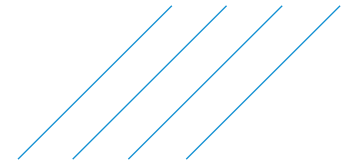
#### 2.2.1. The London Plan

Policy 7.4 Local character states that “Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.” And that “Buildings, streets and open spaces should provide a high-quality design response that:

- has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- is informed by the surrounding historic environment.”

Policy 7.6 Architecture states that “Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.” And that “Buildings and structures should:

- be of the highest architectural quality
- be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- comprise details and materials that complement, not necessarily replicate, the local architectural character



- not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- incorporate best practice in resource management and climate change mitigation and adaptation
- provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- be adaptable to different activities and land uses, particularly at ground level
- meet the principles of inclusive design
- optimise the potential of sites.”

Policy 7.11 London view management framework states that “number of views make a significant contribution to the image and character of London at the strategic level. This could be because of their composition, their contribution to legibility, or because they provide an opportunity to see key landmarks as part of a broader townscape, panorama or river prospect. The Mayor will seek to protect the composition and character of these views, particularly if they are subject to significant pressure from development. New development will often make a positive contribution to the views and can be encouraged. However, in others, development is likely to compromise the setting or visibility of a key landmark and should be resisted.”

### 2.2.2. Camden Local Plan

Policy A1 Managing the impact of development states that “The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. We will:

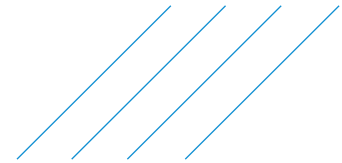
- seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
- resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- require mitigation measures where necessary.

The factors we will consider include:

- visual privacy, outlook;
- sunlight, daylight and overshadowing;
- artificial lighting levels;
- transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
- impacts of the construction phase, including the use of Construction Management Plans;
- noise and vibration levels;
- odour, fumes and dust;
- microclimate;
- contaminated land; and
- impact upon water and wastewater infrastructure.”

Policy D1 Design states that “The Council will seek to secure high quality design in development. The Council will require that development:

- respects local context and character;
- preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;



- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
- q. the historic context of the building's surroundings;
- r. the relationship between the building and hills and views;
- s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
- t. the contribution a building makes to pedestrian permeability and improved public accessibility.

In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.

## 2.3. Townscape context

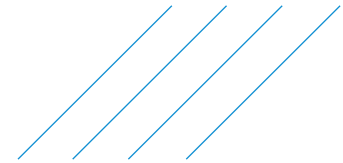
Drummond Street contains a diverse mix of uses including specialist ethnic restaurants and shops. It is situated within a well-preserved grid of historic regency terraces, containing a mix of residential and commercial uses within a tight-knit historic urban grain. It has a vibrant, distinctive character, and Drummond Street itself is recognised for its specialist ethnic shops and restaurants. To the north of the Drummond Street area, St James's Gardens is a historic open space that contains the Grade II listed structures that relate to its history as a burial ground and the National Temperance Hospital which has local heritage value. Hampstead Road forms the western boundary to this sub-area, and provides an important north-south route between Euston Road and Mornington Crescent/Camden Town and a strategic route between the north of the Borough and central London.

Aspects of townscape to be considered for new developments include layout, density and mix, scale, appearance, human interaction, cultural, land use.

The planning application has been submitted five times, essentially for the same building with a varying number of storeys (2018/2397/P six storeys, 2018/2398/P seven storeys, 2018/2399/P eight storeys, 2018/2400/P nine storeys and 2018/2401/P ten storeys).

The proposed development would be potentially visible from a large number of locations including:





- **Drummond Street:** A street with a mix of uses, primarily office/shops with residential use in the upper stories.
- **St James Gardens:** An area of green open space and is located 130m north of the proposed development.
- **Current Euston Station pedestrian entrance:** Located on Melton Street.
- **Euston Square Gardens:** An area of green open space, located 130m south east of the proposed development.
- **Office tower blocks:** Located at the Euston Road/Hampstead Road/Brock Street, above Euston Square Underground Station on Euston Road and at Euston Square Gardens.
- **University College Hospital (17 storey):** Located on Euston Road.
- **Grant Thornton (10 storey) Tower block:** Located on Melton Street.

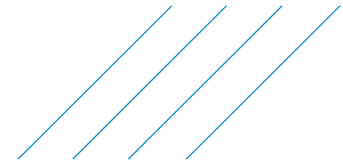
The existing site building is a Calumet camera store. This is a single storey building, with a three-storey block at the side. The building is painted grey. The existing buildings are of low quality, however, there are a number of listed buildings and conservation areas in close proximity to the proposed development site:

- **14–15 Melton Street:** Grade 2 Listed Houses are located in close proximity to the east of the proposed development site.
- **The Bree Louise Pub and No's. 56–67 Cobourg Street:** "Positive non-listed buildings" and situated to the south west corner of the proposed development site.
- **The Former Charing Cross Euston & Hampstead Railway Station:** Locally listed and situated to the north-east corner of the proposed development site.
- **Bloomsbury Conservation Area:** The proposed development is located 200m north of the northern boundary along Euston Road. The conservation areas southern boundary is around 750 metres north of the River Thames. It covers an area of approximately 160 hectares which extends from Lincoln's Inn Fields and High Holborn to Euston Road and from King's Cross Road to Tottenham Court Road.
- **1-9 Melton Street:** Grade II listed building.
- **Euston Fire Station:** Grade II listed building.

## 2.4. Visual impact

Using the HS2 baseline viewpoints contained within the London-West Midlands Environmental Statement, November 2013, Volume 5, Technical Appendices, CFA1, Euston - Station and approach Landscape report (LV-001-001) Landscape and visual assessment ([http://webarchive.nationalarchives.gov.uk/20140613015743/http://assets.dft.gov.uk/hs2-environmental-statement/volume-5/landscape/Vol5\\_CFA1\\_Landscape\\_and\\_visual\\_assessment\\_Landscape\\_report\\_LV-001-001.pdf](http://webarchive.nationalarchives.gov.uk/20140613015743/http://assets.dft.gov.uk/hs2-environmental-statement/volume-5/landscape/Vol5_CFA1_Landscape_and_visual_assessment_Landscape_report_LV-001-001.pdf)), the key views towards the site are listed below. These viewpoints have been chosen as they were selected during the production of the HS2 Environmental Statement to allow an assessment of effects from receptors within the study area with views towards Euston Station, which is in the vicinity of the Proposed Development and therefore relevant of potential views towards this proposal (those that would clearly have no visual relationship with the Proposed Development have not been included). All viewpoints were agreed with the community forums, local planning authorities and other relevant stakeholders, for example English Heritage, the National Trust and Natural England.

- **001-6-003 View north from 215 Euston Road:** This view looks towards the proposed development site from the south side of Euston Road. Due to the four and five storey properties located on the northern side of Euston Road and the tall roadside trees there would be no views of the proposed development from this viewpoint. The potential impact would be the same for all five planning applications as there would be no noticeable views to the proposed development site.
- **001-5-004 View north-east from University College Hospital:** From ground level there is no potential visual impact to the proposed development site, however, there may be oblique views



from the upper stories of the hospital tower block, but these views are felt in be in keeping with the existing long-distance views across the city of London. The potential impact would be the same for all five planning applications as there would be no noticeable views to the proposed development site.

- **001-2-007 View east from Tolmers Square:** The impact of the proposed development would be incrementally worse as the proposed building height increases. The top storeys of the proposed development would be evident in this view as the majority of the existing building fabric has a maximum height of four to five storeys.
- **001-2-008 View south-east from Coburg Street:** The view is looking south west to the proposed development site. There may be glimpsed views of the proposed development, however, within these glimpsed views, the proposed development would be seen as appropriate. The introduction of the proposals when viewed from this location, represent a degree of change to that which exists at present.
- **001-2-009 View south-east from North Gower Street:** In this view, looking south east to proposed development site the application site is offered a significant degree of containment as a result of the existing townscape associated with its boundaries, therefore there would be a barely noticeable change in the views, however, the potential impact would be incrementally worse (adverse) as the proposed building height increases.
- **001-6-024 View west from 1-9 Melton Street:** This view is looking north west towards the proposed development site. The potential impact of the proposed development would be the same as for all five planning applications as there is a high degree of intervening vertical elements in the intervening townscape I.E. tall trees and tall buildings.

In addition to the HS2 viewpoints we have considered the following location:

- **St James' Gardens:** A local Site of Importance for Nature Conservation and along with Euston Square Gardens contributes towards the delivery of Camden's Biodiversity Action Plan and provides valuable green and open space in this central London location. Trees located within St James's Gardens introduce notable vertical elements within the townscape and contribute to the visual separation experienced within the townscape setting, these landscape features reinforce the compartmentalised townscape character of the site and break up the built form.

The proposals would be located within some of the protected view corridors towards Westminster or St Paul's Cathedral. Westminster is located three and a half miles away to the south west and St Paul's Cathedral located two miles away to the south east. It is unlikely that the proposals would be apparent, or impact the quality of the view, when viewed in the context of the existing townscape. No accurate photomontages from these locations have been provided to illustrate this.

There have been several visualisations produced of the proposed development submitted with the planning applications, however no methodology has been provided for these visualisations within the application documentation, therefore it is not possible to tell if they are accurate. Accurate photomontages should be undertaken in accordance with the Landscape Institute Advice Note 01/11 (<https://www.landscapeinstitute.org/PDF/Contribute/LIPhotographyAdviceNote01-11.pdf>).

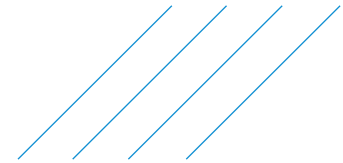
A zone of theoretical visibility would map out where the proposed development would be visible from. No zone of theoretical visibility analysis has been undertaken, meaning there is not sufficient evidence for planners to make a judgement on where the proposed development may be visible from and the associated impacts.

## 2.5. Townscape impact

The townscape impact of the development proposals upon the surrounding residential/office/open space/transport receptors would be a positive one as the proposals would introduce a fresh, modern style of building to the somewhat dilapidated local building fabric. However, there would be an element of negative impact with the introduction of the proposals as the new development would introduce new vertical elements into the townscape, which are not currently present within the localised building fabric on Drummond Street.

The impact of the proposed development would be:





- **Layout:** The layout of the townscape would essentially be the same as the proposed development would be located within the existing street layout, resulting in a neutral change.
- **Density and mix:** This aspect would be impacted as the proposed development would be several storeys taller than the existing buildings, resulting in an adverse change (which would increase along with the height of the proposal).
- **Scale:** The proposed development would be taller than the existing immediate townscape, resulting in an adverse change (which would increase along with the height of the proposal).
- **Appearance:** The proposed development would have a very modern appearance compared to the existing buildings and be notably different in character, resulting in an adverse change (which would increase along with the height of the proposal).
- **Human interaction:** There would be a high level of human interaction as the proposed development will be used as student accommodation, resulting in a beneficial change (for all height options).
- **Cultural:** There are a number of listed buildings close to the proposed development as discussed in the townscape context section, though none would be removed resulting in a neutral change (heritage impacts considered separately).
- **Land use:** The proposed development would be student accommodation and would introduce a new land use into the site that is consistent with uses in other parts of the surrounding area, resulting in a neutral change.

The proposed development site lies within the Euston Road Commercial Area character area. This character area was defined in London-West Midlands environmental statement November 2013, Volume 5, Technical Appendices CFA1, Euston - Station and approach Landscape report (LV-001-001) Landscape and visual assessment

([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/360489/MB62\\_VOL5\\_LV\\_01\\_WATERMARKED.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/360489/MB62_VOL5_LV_01_WATERMARKED.pdf)).

The development proposals can be considered to be in keeping with the character of the area, but would provide a new building with a modern style of architecture which would form a vertical component within views of the townscape.

There are areas of historic and townscape character, including listed buildings and undesignated heritage assets in the Drummond Street area.

Development proposals in the Drummond Street and Hampstead Road area should protect and build upon the existing character of the area and heritage assets, and take opportunities to enhance connections, the public realm and building frontages where appropriate.

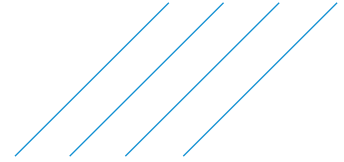
The building would ultimately experience a positive change as the development proposals would introduce a new building into the area with modern architecture to replace the existing, dilapidated structures. However, this may also be seen as a negative impact as the new structure would introduce a very modern element which would be out of keeping with the existing building fabric.

## 2.6. Conclusion

There are significant deficiencies to this application as no formal townscape and visual assessment of the proposed development has been provided with the application. This means there is insufficient evidence to allow planners to make an informed and evidence-based judgement on potential townscape and visual impacts against the policies outlined in the London Plan and Camden Town Plan and the principles detailed within GLVIA.

Similarly, it is not clear that the visualisations submitted with the application provide an accurate visual representation of the proposed development as no methodology has been provided and so are impossible to verify against the guidance for the production of photomontages within LI Advice Note 01/11. Once again, this is level of information insufficient for planning purposes.

Lastly, no Zone of Theoretical Visibility has been produced, as required by GLVIA, meaning a verifiable baseline of potentially affected properties has not been produced. Therefore, there is insufficient evidence for planners to make a judgement on where the proposed development may be visible from and the associated impacts. Given the location of the proposed development, it is



likely that it would be potentially visible from a large number of locations. Without the required ZTVs, it is likely that key receptors, and the potentially significant impacts upon, them may be overlooked.

From certain views along the streetscape the proposed development would result in a clear and noticeable change to the skyline. As the number of storeys increases the townscape and visual impact becomes increasingly negative due to the greater contrast with the existing townscape character and the increasing zone of visual influence.

The proposed development would have adverse townscape and visual impacts for receptors in its vicinity, the degree of which is impossible to ascertain due to the shortcomings of the planning applications. These impacts form a key part of the decision-making process for planners and without this information it is considered that an informed and evidence-based judgement of these applications is not possible.