

Delegated Report

Officer

Gavin Sexton

Application Number(s)

2018/2397/P : 6 storey
2018/2398/P : 7 storey
2018/2399/P : 8 storey
2018/2400/P : 9 storey
2018/2401/P: 10 storey

Application Address

93-103 Drummond Street and 63 Cobourg Street,
London,
NW1 2HJ

Drawing Numbers

Refer to decision notices

Proposal(s)

2018/2397/P: Redevelopment to provide 122 student apartments (58 studio apartments, 13 twin units, 53 cluster units, 5 wheelchair cluster units, 11 wheelchair studio units) comprising 135 bed spaces with a floor area of 2,488sqm (GIA) within a 6 storey building with basement and a commercial unit of 102sqm at ground floor.

2018/2398/P: Redevelopment to provide 127 student apartments (61 studio apartments, 15 twin units, 53 cluster units, 5 wheelchair cluster units, 11 wheelchair studio units) comprising 142 bed spaces with a floor area of 2,619sqm (GIA) within a 7 storey building with basement and a commercial unit of 102sqm at ground floor.

2018/2399/P: Redevelopment to provide 132 student apartments (64 studio apartments, 17 twin units, 53 cluster units, 5 wheelchair cluster units, 11 wheelchair studio units) comprising 149 bed spaces with a floor area of 2,750sqm (GIA) within an 8 storey building with basement and a commercial unit of 102sqm at ground floor.

2018/2400/P: Redevelopment to provide 137 student apartments (67 studio apartments, 19 twin units, 53 cluster units, 5 wheelchair cluster units, 11 wheelchair studio units) comprising 156 bed spaces with a floor area of 2,811sqm (GIA) within a 9 storey building with basement and a commercial unit of 102sqm at ground floor.

2018/2401/P: Redevelopment to provide 142 student apartments (70 studio apartments, 21 twin units, 53 cluster units, 5 wheelchair cluster units, 11 wheelchair studio units) comprising 163 bed spaces with a floor area of 3,012sqm (GIA) within a 10 storey building with basement and a commercial unit of 102sqm at ground floor.

Recommendation(s):

Issue 5 x certificates to certify in schedule 1 the appropriate alternative developments in respect of the application site.

Application Type:

Five x Certificate of Appropriate Alternative Development

Consultations

Adjoining Occupiers:	No. notified 00		No. of responses 00		No. of objections 00	
Summary of consultation responses:	Site notices were displayed for all 5 applications from 1 st June 2018 to 22 nd June 2018. No comments were received.					
CAAC/Local groups* comments: *Please Specify	No responses. The GLA were consulted but declined to comment.					

HS2

HS2 object to the 5 applications.

In summary:

The assessment of what would be considered appropriate alternative development has already been undertaken by the Council. If development of an increased scale and floorspace to that of the 9 February 2018 had been considered acceptable, then this should have been specified by the Council in Schedule 3 of the Certificate. We assume, therefore, that no additional floorspace, units or height/scale would have been permitted. In any event, we consider that there is insufficient information to enable the applications to be robustly assessed.

There are a number of key issues which require robust consideration:

- The extent to which the schemes in the five CAAD applications would impact on listed and non-listed heritage assets around the site;*
- Whether the daylight and sunlight assessment has been conducted in a robust manner which allows for clear decisions to be made on the suitability of the schemes for their proposed use and any impact on adjoining buildings; and*
- The extent to which the taller schemes in the five CAAD applications are acceptable in townscape terms*

Heritage assessment (carried out by from a historic environment perspective by Atkins' specialist heritage team on behalf of HS2) concluded

- There is inadequate assessment of the presence of, and significance of, heritage assets (including a lack of evidence of a historic environment record search having been carried out), and inadequate assessment of the impact upon these designated and non-designated assets;*
- There is inadequate assessment of the impact upon protected London strategic views and local views and no evidence of the consultation required for these;*
- The designs demonstrate a lack of respect for local character and context, in terms of scale, materials and design; and*
- There would be harm to the significance of designated and non-designated heritage assets through changes to their settings by the proposed development; detracting from the setting of listed buildings*

Neighbour amenity

- Whilst Atkins conclude that the submitted report has been undertaken in the correct manner, their review concludes that the lack of depth of analysis does not adequately show compliance with the benchmark values in relation to daylight and sunlight. Atkins disagree with a statement by GVA in their report*

about the orientation of the Cobourg Street properties, which they conclude would lead the reader to doubt the validity of all of the results.

- Atkins state that they need to understand the level of assumptions which underpin the GVA report, and be provided with more detail on the calculation procedure, to be able to understand the calculation tolerances that should be applied. Atkins also state that this lack of information again influences the level of surety in the accuracy of the results GVA have provided.*
- With regard to the items identified above, Atkins state that additional clarity in the report information is needed to back up its conclusions. In order to satisfy itself that the results are accurate, we consider the Council should request, from the Applicant, the original calculation model from GVA to allow a full investigation of the daylight requirements, additional survey, and calculations to be undertaken. Without this, it is considered that there is no robust basis on which to conclude that the CAADs could be issued. The Applicant has, in HS2's opinion, provided insufficient information for the Council to robustly assess the five applications.*

Site Description

The site is located within an urban block adjacent to Euston Station and forms part of the area identified for the redevelopment of Euston Station following the Government announcement of the preferred route for High Speed 2 (HS2). It is bound by Drummond Street to the north, Melton Street to the east, Euston Street to the south and Cobourg Street to the west and has a prominent corner presence at the junction of Drummond Street and Cobourg Street with frontages on both streets.

The present buildings on the site are 2 to 3 storeys in height on Drummond Street, with a large double height space covered by an extensive pitched roof in the middle of the block. They were historically used as a car garage, dealership and petrol station and have since been converted into a mixed use comprising an office, workshop, storage and retail space currently occupied by a specialist camera retailer. The corner of Drummond Street and Cobourg Street is unbuilt and the former petrol station forecourt is currently used as a car park.

There is also a basement over the whole of the site. Public access into the buildings is currently from the Drummond Street frontage. There is service access via the old petrol station forecourt and via a passage way under the residential properties on Euston Street. The perimeter of the rest of the block has buildings of varying scale and uses.

On the corner of Melton Street and Drummond Street, sharing a boundary with the site, is the 3-storey locally listed former Charing Cross and Hampstead Railway (CCHR) Underground Station with its glazed terracotta arched façade. Adjacent on Melton Street (Nos. 14 and 15) is a pair of Grade II listed Georgian 3-storey houses, with basements, rendered façades and rusticated bases at ground floor level.

At the corner of Euston Street and Cobourg Street is a 3-storey 1930's public house (The Bree Louise Pub) built in brick, with a high chimney at the corner, and a steep pitched roof. Adjoining the public house along Cobourg Street are 4 early Victorian locally listed terraced houses (Nos. 59 to 67) which have been converted into flats. One of the houses spans across the ground floor access way which also provides service access into the site.

Surrounding the site are buildings of larger scale such as the Ibis Hotel directly opposite on the north side of Drummond Street. This is a primarily brick building with extensive mansards disguising the upper part of accommodation and plant. The hotel has 5 storeys onto Drummond Street rising to 5/7 towards Melton Street. To the south along Euston Street the buildings vary from 3 to 5 storeys.

On the western side of Cobourg Street is a 1960's telephone exchange with a 3-storey block façade in large precast concrete panels.

The immediate surrounding context is made up of buildings of varied periods, use and scale with taller larger buildings, particularly to the south east and west.

The site is not within a conservation area and there are no statutorily or locally listed buildings on site.

The site is highly accessible by public transport and has a PTAL of 6b (the highest level).

Relevant History

Recent

2016/0797/PRE – Creation of 99 student (56 studios, 8 twin and 35 cluster) apartments within a 5-storey building with basement and a commercial unit (218.46sq.m GEA) at basement and ground floor levels fronting Drummond Street – pre-application advice issued on 23/09/2016.

2016/3599/P - Change of use from existing mixed use comprising office, workshop, storage and retail to business use (Class B1) - Granted Subject to a Section 106 Legal Agreement on 23/12/2016.

2017/0527/P - Certificate of Appropriate Alternative Development Granted - 13/04/2017 for: *Redevelopment to provide 99 student apartments (46 studio units, 8 twin units, 35 cluster units and 10 wheelchair studio units) comprising 107 bed spaces with a floor area of 2771.9sqm GIA) within a **5-storey building** with basement and a commercial unit (241.7sqm GIA) at basement and ground floor levels.*

2017/3246/P – Certificate of Appropriate Alternative Development Granted - 30/08/2017 for *Redevelopment to provide 112 student apartments (60 studio units, 9 twin units, 30 cluster units, 3 wheelchair cluster unit, and 10 wheelchair studio units) comprising 123 bed spaces with a floor area of 2388sqm (GIA) within a **5-storey building** with basement and a commercial unit of 192sqm (GIA) at basement and ground floor levels.*

2017/6619/P - Certificate of Appropriate Alternative Development Granted - 09/02/2018 for *Redevelopment to create 112 student apartments (60 studio units, 9 twin units, 30 cluster units, 3 wheelchair cluster units, and 10 wheelchair studio units) comprising **123 bed spaces** with a floor area of 2388sqm (GIA) within a **5-storey building** with basement and a commercial unit of 192sqm (GIA) at basement and ground floor levels.*

2017/1660/p: Application for Certificate of Appropriate Alternative Development - 5 options – was Withdrawn by the applicant and replaced by the current 5 applications which are assessed here.

2018/1809/p_ - Certificate of Appropriate Alternative Development **Granted** – 20/06/2018 for *Redevelopment to create 112 student apartments (60 studio units, 9 twin units, 30 cluster units, 3 wheelchair cluster units, and 10 wheelchair studio units) comprising 123 bed spaces with a floor area of 2388sqm (GIA) within a 5-storey building with basement and a commercial unit of 192sqm (GIA) at basement and ground floor levels.*

Officer note: This application differed from 2017/1660/P only in respect of correcting the Valuation Date contained in the application documentation, from 30 November 2018 to 23 November 2018.

Historic

36164 - Use to provide five storey building and general up-grading of premises – Refusal - 27/05/1983

8402010 - Change of use to ground floor and basement for the display sale storage and repair of professional photographic equipment and parking and the first and second floors as offices – Granted - 20/02/1985.

8800589 - The redevelopment of the site by the erection of a four storey (plus basement) building for a mixed use comprising showroom with light industrial use and ancillary office and storage space - Granted - 03/08/1989.

8800590 - Redevelopment of the site erection of a five storey (plus basement) building for office showroom and storage use – Refused - 27/02/1990

9100626 - The erection of four canvas sun blinds on the Drummond Street elevation beneath the existing fascia sign – Granted - 17/09/1991.

9501541 - The installation of a new shopfront – Granted - 06/10/1995.

PSX0205408 - Erection of railings and gates to enclose car park – Granted - 28/01/2003.

9280005 - Display of internally illuminated fascia sign - 08/05/2003.

Relevant policies

National Planning policy Framework 2012

The London Plan

The Mayor published a draft of the new London Plan for consultation in November 2017. It is a material consideration but of limited weight at this stage. The following London Plan 2016 policies are relevant:

- 2.9 Inner London
- 2.14 Areas for regeneration
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.10 Definition of affordable housing
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 4.4 Managing industrial land and premises
- 4.7 Retail and town centre development
- 4.8 Supporting a successful and diverse retail sector and related facilities and services
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.5 Decentralised energy networks
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.18 Construction, excavation and demolition waste
- 6.3 Assessing effects of development on transport capacity
- 6.4 Enhancing London's transport connectivity
- 6.5 Funding Crossrail and other strategically important transport infrastructure
- 6.7 Better streets and surface transport
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road network capacity
- 6.13 Parking
- 6.14 Freight
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Location and design of tall and large buildings
- 7.8 Heritage assets and archaeology
- 8.2 Planning obligations

Camden Local Plan 2017

- G1 Delivery and location of growth
- H1 Maximising housing supply

- H2 Maximising the supply of self-contained housing from mixed-use schemes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- H9 Student housing
- H10 Housing with shared facilities
- C1 Health and wellbeing
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- A1 Managing the impact of development
- A2 Open space
- A3 Biodiversity
- A4 Noise and vibration
- A5 Basements
- D1 Design
- D2 Heritage
- D3 Shopfronts
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- TC1 Quantity and location of retail development
- TC2 Camden's centres and other shopping areas
- TC3 Shops outside of centres
- TC4 Town centres uses
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

Camden Planning Guidance (updated 2018)

- CPG1 Design (2013)
- CPG2 Housing (2015)
- CPG3 Sustainability (2011)
- CPG4 Basements and Lightwells (2015)
- CPG6 Amenity (2011)
- CPG7 Transport (2011)
- CPG8 Planning Obligations (2015)
- CPG Town Centres, retail and employment (2013)

Euston Area Plan (Adopted January, 2015)

Assessment

- 1.1 The application site is subject to compulsory purchase powers under the High Speed Rail (London-West Midlands) Bill ("the HS2 Act 2017") as part of the proposal for a new station at Euston. Royal Assent to the HS2 Act 2017 was given on 23rd February 2017. HS2 compulsorily purchased the property on 23rd November 2017, which is the statutory valuation date.
- 1.2 The applicant will be compensated by HS2 in accordance with the statutory compensation code, with value assessed on the basis of the property's open market value on the valuation date.
- 1.3 The value is to be assessed on the basis that the HS2 scheme is cancelled. The basis of any valuation will be the existing use and what development could reasonably be assumed to have been granted planning permission at the valuation date. Extant planning permissions, development plan, supplementary planning guidance, site planning briefs and pre-application advice will all be relevant to assessing the acceptable development potential.
- 1.4 Section 17 of the Land Compensation Act 1961 provides a mechanism for indicating the descriptions of development for which planning permission can be assumed to be appropriate as at the relevant valuation date – this is referred to as "Appropriate Alternative Development". Appropriate Alternative Development is development, which would in the circumstances known to the market at the relevant valuation date reasonably have been expected to receive permission on that date or on a future date.
- 1.5 To take account of the fact that the scheme may have caused planning blight, it must be assumed that the scheme was cancelled on the "launch date". In the case of HS2, that is the date on which the HS2 Bill was deposited in Parliament, i.e. 25 November 2013. It must also be assumed that no other actions have been undertaken by the acquiring authority for the purposes of the scheme and that there is no prospect of that scheme or a similar scheme being taken forward in the future.
- 1.6 The Ministry of Housing, Communities and Local Government guidance note (Guidance on Compulsory purchase process and The Criche Down Rules Feb 2018) states in para 255 that *"the main feature of the arrangements is that the planning assumptions are assessed on the relevant valuation date (as defined in section 5A of the Land Compensation Act 1961) rather than the launch date (even though the scheme is still assumed to have been cancelled on the launch date). This will avoid the need to reconstruct the planning regime that existed on the launch date, including old development plans, national planning policy and guidance. Also that the planning assumptions are based on 'the circumstances known to the market at the relevant valuation date', which would include the provisions of the development plan. This removes the need for the specific references to the development plan which were contained in the previous section 16 that had become out of date."*
- 1.7 Although the determination is made in the circumstances known to the market at the valuation date, an application can be made before that date. In those circumstances, the local planning authority must seek to anticipate what the planning circumstance will be at the anticipated valuation date.
- 1.8 The Council is required to assess these applications on the basis of the planning policy position and to issue a certificate accordingly. Under section 17(1) the Council must issue a certificate containing whichever of the two following statements it considers applicable:

"(a) that in the local planning authority's opinion there is development that, for the purposes of section 14, is appropriate alternative development in relation to the acquisition;

(b) that in the local planning authority's opinion there is no development that, for the purposes of section 14, is appropriate alternative development in relation to the acquisition."

1.9 If a certificate is issued under section 17(1)(a) then under section 17(5), it should:

"(a) identify every description of development (whether specified in the application or not) that in the local planning authority's opinion is, for the purposes of section 14, appropriate alternative development in relation to the acquisition concerned, and

(b) give a general indication —

(i) of any conditions to which planning permission for the development could reasonably have been expected to be subject,

(ii) of when the permission could reasonably have been expected to be granted if it is one that

could reasonably have been expected to be granted only at a time after the relevant valuation date, and

(iii) of any pre-condition for granting the permission (for example, entry into an obligation) that

could reasonably have been expected to have to be met."

Principle Issues

1.10 The site history above sets out details of the relevant previously certified applications for Certificates of Appropriate Alternative Development.

1.11 The principal considerations material to the determination of this application are summarised as follows:

- Principle of land use
- Design and scale
- Standard of accommodation
- Basement construction
- Residential amenity
- Sustainability
- Transport
- Refuse and recycling
- Security

2. Principle of land use

2.1 No objection is raised to the loss of the existing sui-generis use and the re-development of the site for student housing. Camden Local Plan Policy H9 supports the development of student housing subject to a number of criteria. CPG2 advises that the Council will resist proposals for student housing developments that would prevent the Council's target for delivery of self-contained homes being met. The Council will consider the suitability of any site for alternative housing, particularly if it has been identified as one which is suitable for affordable housing or housing for older or vulnerable people. In this consideration, the Council will have regard to the Camden Site Allocations Document; and extant planning permissions that have already secured permanent Class C3 accommodation.

- 2.2 In considering the location of student housing schemes, the Council will have regard to:
- existing concentrations of student accommodation in the area as a proportion of the overall population;
 - the wider housing mix in the community; and
 - the impact on residential amenity in the area.
- 2.3 Camden is home to 11 Higher Education Funding Council for England (HEFCE) Institutions as listed in Appendix C of CPG2. Policy H9 requires student housing development to provide a range of accommodation that is affordable to the student body as a whole. The London Plan Housing SPG identifies 33% of students in London as receiving means tested maintenance grants (2013/14 being the most recent prior to this grant having ended). Therefore, 33% is considered to be a reasonable proportion of student spaces which should be provided amount to be achieved in order to satisfy policy H9.
- 2.4 The applicant has confirmed that the same provisions in respect of the affordability of accommodation would apply as previously agreed under the planning reference 2018/1890/P, ie that 30% of the student housing would be affordable student accommodation.
- 2.5 The remaining student housing (67%) would still need to have an s106 agreement clause to restrict this as student housing for a HEFCE Institution; although the nominations aspect of the agreement for the remaining units could be removed. This requirement would be secured and wording to meet the requirements of para 122 of the CIL regulations. The overall arrangement would ensure that the use continues as student housing in accordance with policy H9 and thus does not come under policy H2 requiring a mixed use scheme with 50% self-contained housing.
- 2.6 The proposed student accommodation would 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. The development would not involve the net loss of existing housing; student housing is considered to be a suitable development for the site which would not prejudice the supply of self-contained homes or involve the development of an allocated housing site; the development would meet the relevant local HMO standards; the site is accessible to local education institutions; would include a range of flat layouts including flats with shared facilities; the proposed student housing would be for universities in the borough or across London and this would have been secured by way of S106 legal agreement; the site is also highly accessible by public transport; will add to the creation of a mixed, inclusive and sustainable community in the Euston area and would not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity.

Design

Design: context

- 2.7 The NPPF (paragraphs 56 and 57), the London Plan (Policies 7.1 to 7.8) and Camden's Local Plan policies D1 and D2, Camden Planning Guidance 1 (CPG1: design) 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.
- 2.8 The NPPF also states that, in determining planning applications where heritage assets are involved, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

- 2.9 The London Plan also requires, at Policy 7.8, that development affecting heritage assets conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Camden Policy D2 also seeks to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.
- 2.10 The street block is composed of a variety of building types predominantly three storeys tall: houses, a former tube station, a 1920s petrol station. These buildings were built in the 19th and early 20th century, with the exception of a block to the south east, to the Euston Road side of the block, which is also one storey taller. Buildings on surrounding blocks are of similar scale. Although the brick hotel to the north is five storeys tall, this is mitigated by the top two storeys in setback mansard form. Likewise, the block to the north west is three storeys with a set-back mansard. A concrete structure to the west is four storeys tall, while to the south, the block is faced by a mixture of three-storey historic terraced houses and, transitioning into the context of the large buildings on the Euston Road, a four-storey office block, with two set-back storeys.
- 2.11 The existing building is neither statutorily nor locally listed and does not fall within a conservation area. The block comprises frontages onto Melton Street, Drummond Street, Cobourg Street and Euston Street. The block includes a number of buildings which are listed as heritage assets and these have been correctly identified by the applicant in their submissions. These comprise :
- a locally listed oxblood-tiled former tube exit (three storeys) at the corner of Drummond Street and Melton Street;
 - four locally listed townhouses (nos 59-67) and a locally listed pub (the Bree-Louise) on Cobourg Street (all three storeys);
 - two grade-II-listed terraced houses (three storeys) at 14-16 Melton Street
- 2.12 The applicant's submission does not identify the other heritage assets in the immediate area beyond the block itself, the setting of which will may also be affected by the proposed buildings. These include :
- the group of locally listed buildings at the north-west corner of Cobourg Street and Drummond Street,
 - the grade-II-listed houses and pub at the corner of Drummond Street and North Gower Street
 - the three listed houses along Drummond Street itself.
- 2.13 These buildings are all considered to contribute positively to the character and appearance of the local townscape, which is relatively cohesive in terms of its prevailing heights, architectural forms and townscape character.
- 2.14 The existing building is not within a conservation area and is of limited architectural merit and therefore no objection is raised to its demolition subject to a suitable replacement being agreed.

Design: Height and massing

- 2.15 The proposed building would re-instate the north-west corner of the urban block. On the Drummond Street elevation the building would be aligned with the footprint of the CCHR railway station building. The junction between the new building and the 19th century terrace at Nos. 59 to 67 Cobourg Street would feature a setback in the built form so as to frame the terrace. The proposed building would be arranged as two distinct but interconnecting parts - one facing Drummond Street and Cobourg Street, the other in two wings within the central part of the block.
- 2.16 The most significant revision to the certified scheme is the additional massing and height from 4th floor upward. The setback 4th floor sees a shift in the design language from punched-hole openings in brick to a framed upper part clad in stone with large glazed openings. The applicant's Design & Access Statement describes the 4th-9th floors as extending from the setback fifth floor (sic) mansard and receding into a 'turret feature' on the corner of Drummond and Cobourg Street. Officers consider that this description significantly underplays the scale and impact of the proposals which, even at its lowest iteration of 6 storeys, be very much taller than anything in the immediate context, which is predominantly three or four storeys tall. The insertion of a four-storey podium block with a tower of two to six storeys above would be uncharacteristic and would dominate the surrounding buildings in a highly noticeable way, especially in important views along Drummond Street and along Cobourg Street. This harm to the fine grain and skyline of the neighbourhood would increase with the addition of each storey. Thus, even the smallest iteration of the proposal fails to complement local character, fails to integrate well with surrounding streets and fails to preserve local views.
- 2.17 Views of the heritage assets along Drummond Street would be harmed by the introduction in the near distance of a building of the scale and design proposed. Long views from the east of the grade-II*-listed RCGP corner block at the corner of Melton Street and Euston Road are also likely to be harmed. The tube station and houses on Cobourg Street will abut the new building, while it will loom above the listed buildings on Melton Street. The proposal is likely to be visible in views out of the Bloomsbury Conservation Area, while the tallest iterations are likely to be visible more widely. These impacts do not appear to have been assessed in the submission which fails to demonstrate that harm would not result.
- 2.18 The massing of the additional floors on the street corner, albeit setback marginally from the street elevation, would make the tower element highly visible in local views to the extent that it would dominate the surrounding buildings and townscape.

Design: detail

- 2.19 The detailed design of the five proposals has been revised from the scheme which was assessed and considered acceptable under reference 2018/1809/P. The main entrance into the student housing remains on the corner of Drummond Street and Cobourg Street and leads to a central lift core with lifts accessing the residential accommodation on the upper floors. However the scale of the entrance lobby has been expanded and the commercial floorspace at ground floor has been reduced in size and reconfigured. Secondary access into the building would also be provided via the existing passageway under the houses in Cobourg Street. An active street frontage onto Drummond Street would still be maintained with a new ground floor retail unit extending into the basement and accessed directly from the street.
- 2.20 The discrete shopfronts separated by robust brick piers of the certified scheme have been replaced by a series of large, generic glazed commercial openings which appear to pay no regard to the prevailing visual interest and historic character of the block and

surrounds. The upper elevation to Drummond Street has seen the fenestration change from a simple arrangement of pairs in a vertical hierarchy to large openings in a grid form with a more generic glazing pattern.

- 2.21 The application includes no significant detail on materiality, although the illustrative images appear to show a brick base with stone and large elements of glazing at the upper levels. The proposals would introduce an incongruous architectural language with expansive areas of propriety glazing at the upper levels which bears no relation to the nature of the uses and activities in the small living spaces which sit behind the elevations. There is no allowance on the elevations or plans for rooftop plant or lift overruns, which would add to the height and potential massing on the corner and further demonstrates a set of unresolved generic development proposals with little account taken to detail. The elevations and internal programme do not indicate a well-considered or resolved arrangement.

Design: conclusion

- 2.22 Each of the 5 proposals include a building which is substantially taller than its neighbours. Local Plan policy D1 advises that *“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.*
- 2.23 The submitted documents fail to address any of these points with substantive detail and it is considered that the proposals, by virtue of their height, massing and detailed design would fail to respect local character, preserve or enhance the setting of local heritage assets or local heritage context, preserve local views, include materials which are demonstrably of high quality and complement the local character, or integrate well with surrounding streets, contrary to policies D1 and D2.
- 2.24 Overall it is considered that the massing and height of the previously certified scheme (2018/1809/P) represents the maximum that could reasonably be achieved on the site whilst respectful of the local context. The height, bulk, massing and design of the proposals, rising in increments to 5 further storeys above the acceptable 5 storey proposals, would create an incongruous element in the streetscape and are unacceptable in principle.

3. Standard of accommodation

- 3.1 The proposed student accommodation would be arranged either in cluster apartments with communal facilities, or studio apartments with integral kitchenettes
- 3.2 The proposals are as follows:

Ref	Max Storeys	Total rooms	Total beds	Wheelchair accessible (beds)
2018/1809/P	5	112	123	13
2018/2397/P	6	122	135	16
2018/2398/P	7	127	142	16
2018/2399/P	8	132	149	16
2018/2400/P	9	137	156	16
2018/2401/p	10	142	163	16

- 3.3 CPG2 requires 10% of student bedrooms to be wheelchair accessible. In each of the 5 proposals an appropriate minimum of the total bedspaces are designed to be suitable for wheelchair users in order to meet the 10% requirement. All apartments are accessible to wheelchair visitors.
- 3.4 The student accommodation would provide a satisfactory standard of accommodation in each room for future occupiers in terms of light, privacy, outlook and amenity space. Individual room sizing and living accommodation has been designed to comply with Camden's guidance for HMOs and policy H9 and each of the units would provide a satisfactory floorspace for individual bedrooms and the studios as a whole. The accommodation would make an efficient use of the space and would have access to suitable refuse storage facilities and secure bicycle parking facilities.
- 3.5 The proposed schemes all include a gym and lounge for communal use in the basement. The lounge would be approx. 75sqm in size and gym c.31sqm. The lounge facilities would have very limited outlook and would provide the equivalent of 0.55sqm to 0.46sqm of space per occupier (based on occupancy of 135 to 163). There is an entrance lobby at street level however it is considered that this is unlikely to be conducive to facilitating social interaction except as a brief meeting location. The cluster flats on the lower floors (below 3rd floor) would provide pleasant spaces for small scale social interactions at those lower levels. The level and quality of provision of communal space has been found to be acceptable for the previous CAAD application (ref 2018/1809/). However no additional capacity for communal spaces has been included within the 6-10 storey additions with the current 5 sets of proposals and there is no access to outdoor amenity space provided as part of the scheme.
- 3.6 It is considered that as part of any conventional planning application these considerations would require design changes before they would be supported by officers. However for the purposes of this assessment it is considered that the quality of the shared amenity space could likely be improved within the constraints of the proposed building envelopes and therefore the issue is not considered to be significant enough to justify a likely reason for refusal of a planning application in its own right, if one were to have been made.

4. Basement construction

- 4.1 Policy A5 and Basement Guidance set out how planning applications that include proposals for new or extensions to basements will be assessed. The proposal includes a single storey basement below the site. The site currently has a basement albeit with a smaller footprint. A Basement Impact Assessment (BIA) would be required as part of any

planning application, which assesses the potential impact on land stability and groundwater flow. The Assessment and a requirement for compliance would have been secured by way of a S106 legal agreement.

- 4.2 A condition would be required to be attached to any permission granted, which would require the appointment of a qualified chartered engineer with membership of the appropriate professional body to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body.

5. Residential Amenity

- 5.1 Policies A1, A4 and CPG require that the amenity impact on neighbouring properties be fully considered. Policy A1 seeks to ensure that the amenity of occupiers of neighbouring properties is protected. It states that planning permission will not be granted for development that causes harm to the amenity of occupiers and neighbours in terms of loss of daylight, sunlight, outlook and privacy.
- 5.2 A Detailed Daylight and Sunlight Report has been submitted which assesses the impact of the 10 storey massing on daylight and sunlight to neighbouring properties. The methodology used in the report follows the Building Research Establishment (BRE) Guidance 'Site layout planning for daylight and sunlight: A guide to good practice' and is acceptable. The consultation response from Atkins, prepared on behalf of HS2, also confirms the acceptability of the methodology as a general principle.
- 5.3 Below floors 5-9 the proposal is not significantly different to the proposals which were certified under reference 2018/1809/P which was assessed as having an acceptable impact on local daylight and sunlight amenity. The impact of the 5 additional proposals is therefore the key consideration for assessing the additional impact of these 5 schemes.

59 – 69 Cobourg Street

- 5.4 The terrace of properties at 59 to 69 Cobourg Street are located to the south west of the site. The properties at no's 59-67 are 3 storey Victorian townhouses. No. 59 has a 3-storey rear outrigger, no 61 has a 2-storey rear projection, no 65 has a single storey rear extension and no 67 has a two-storey rear extension. No 69 Cobourg Street is a public house with residential use on the upper floors located at the junction with Euston Street. The rear of these properties are located close to the site boundary (between 2-4 metres). The existing building on the site which covers the site is located right on this site boundary at basement/ground floor levels with a pitched roof at first floor level.
- 5.5 In terms of the relationship with the proposed development. The proposed main 6-10 storey block would be located to the north of the terrace at the junction with Drummond Street. This block would project to the rear (north east) of this terrace. The development would step up from first, then second and third floor levels from west to east to the rear of no. 59 Cobourg Street. The remainder of the development to the rear would be at ground level only apart from the rear part of the site where it would extend up to first floor level. In terms of potential impact, no's 61, 67 and 69 Cobourg Street would face onto ground level development only. The property at no. 59 Cobourg Street would be closest to the 6-10 storey corner block and would also face onto the stepped 2-4 storey rear wing of the proposal building. The property at no. 65 Cobourg Street would face onto the 2 storey building in the rear part of the site.
- 5.6 The Daylight and Sunlight assessment indicates that several windows in the terrace at 59-69 Cobourg Street would not meet the recommended target level in the Building Research Establishment (BRE) Guidance for Vertical Sky Component (VSC). These

include rear windows at 59 Cobourg Street, 61 Cobourg Street, 65 Cobourg Street, 67 Cobourg Street, and 69 Cobourg Street. However, the majority of these worst affected windows already have low VSC baseline levels due to the proximity to the existing building on the site. Although the development would result in a greater than 20% loss compared to the existing situation, this is due to the existing low baseline levels and the actual differences between the VSC levels is small. Furthermore the impact on the %age of Daylight Factor and No Sky zones within the affected rooms would not be as significant as the apparent VSC loss.

- 5.7 In terms of loss of outlook and enclosure, the development would be set off the rear boundary and the rear elevation of the terrace at 59-61 Cobourg Street at upper floor levels. The main impact would be on 59 Cobourg Street, which would experience moderate enclosure to the rear from the proposed adjacent 6-10 -storey corner block. However, the corner block would not be sited directly to the rear of the rear windows at this property and the part of the development, which would be to the rear, would be set away from the boundary and would step-away at upper floor levels. The additional height proposals on the upper floors of the corner element would not be within the direct line of sight of the windows and therefore it is considered that the additional storeys are unlikely to add a significant element of harm, above that already accepted as part of the 2018/1809/P application.

56-64 Euston Street

- 5.8 The terrace at 56-64 Euston Street includes the 3-storey office building at no. 56 and the 3- storey terrace of residential properties at no's 58-64. Again, the rear of these properties is located close to the site boundary (approx. 3 metres). The existing building on the site which covers the site is located right on this site boundary at basement/ground floor levels with a pitched roof at first floor level. In terms of the relationship with the proposed development, this terrace would face onto the 2-storey rear part of the building.
- 5.9 The Daylight and Sunlight assessment indicates that almost all of the rear windows on this terrace would meet BRE Guidelines or would marginally fail the target level. However, this level of impact is not considered to be significant in the dense Central London location. The rear of this terrace also faces north and therefore no assessment of loss of sunlight is required.
- 5.10 In terms of loss of outlook and enclosure the development would only be 2 storey in this part of the site and the first floor of the proposed development in this part of the site would be set well of the boundary and rear elevations resulting in no material loss of outlook or enclosure.

14-15 Melton Street

- 5.11 14 and 15 Melton Street to the east of the site are 3 storey mid-terraced Victorian townhouses.
- 5.12 The rear of these properties is located close to the site boundary (between 3-5 metres). The existing building on the site which covers the site is located right on this site boundary at basement/ground floor levels with a pitched roof at first floor level. In terms of the relationship with the proposed development, this terrace would face onto the part single part 2-storey rear part of the building.
- 5.13 The Daylight and Sunlight assessment indicates that almost all of the rear windows on this terrace would meet BRE Guidelines; one window would marginally fail the target level, however, this level of impact is not considered to be significant in the dense Central London location. The development would result in some loss of sunlight to the rear windows on this terrace above the recommended target levels in the BRE Guidance. However, this is mainly due to the loss of winter sunlight from existing low baseline levels.

As stated in the Daylight and Sunlight assessment, this level of impact is consistent with this dense urban location.

- 5.14 Overall, the submitted Daylight and Sunlight assessment demonstrates that the daylight and sunlight impact of the development would not be substantial enough to result in demonstrable harm to neighbouring amenity. Weight has been attributed to the fact that the adjacent properties which would receive some impact already receive low levels of light, the fact that this is a dense Central London location and the fact that this development is the same as previous certified applications 2017/3246/P and 2017/6619/P. The minor impacts also need to be weighed against the benefits of redevelopment of the site for student housing.
- 5.15 A Noise Assessment would normally have been submitted with a planning application to fully consider the impact of the proposals on existing neighbouring residential properties in Coburg Street, Euston Street and Melton Street together with the impact of traffic and railway noise on future occupiers and their access to light. In order to protect the amenity of neighbouring residents, a noise condition is considered to be appropriate.
- 5.16 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. This would be secured by S106 legal agreement.

Amenity: conclusion

- 5.17 The Daylight and Sunlight assessment states that the BRE Guidance accepts that it may not be possible to adhere to the targets in dense urban environments such as this. It also states that in situations where the actual numerical reduction in VSC is small there would be a 'no-worsening' of the current situation. Overall the conclusions of the BRE assessment are considered to be reasonable. It is also acknowledged that the impact of the development matches the previously certified applications. The rear of the terrace at 59-61 faces north-east and therefore no assessment of loss of sunlight is required.

6. Sustainability

- 6.1 Camden Local Plan Policies CC1 and CC2 requires compliance with The London Plan 35% reduction in CO2 emissions beyond the Part L 2013 building regulations following the energy hierarchy. These policies also require a 20% reduction in CO2 emissions through renewable energy together with the incorporation of sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Energy efficient design requires an integrated approach to solar gain, access to daylight, insulation, thermal materials, and ventilation, heating and control systems. These should be considered in relation to each other when designing a scheme. The Council's sustainability requirements set out in CPG3 (Sustainability) should be complied with.
- 6.2 Any formal planning application would require an energy and sustainability statement to demonstrate how the proposals could meet the requirements of the Council and the London Plan. The proposal would be required to meet BREEAM Multi Residential Scheme 'Excellent'. The potential to connect to a decentralised local energy network, such as Netley School (Regents Park) or High Speed 2 (HS2) would also need to be explored. This would be secured by S106 legal agreement, with a requirement that evidence of a final BREEAM Certificate being issued prior to occupation, in a sustainability plan requirement. An energy efficiency and renewable energy plan is also considered to be appropriate to be secured by S106 legal agreement.

- 6.3 Conditions relating to the provision of green roofs and photovoltaic panels would also be required as part of any acceptable scheme. The Council will also require the development to reduce the pressure on the combined sewer network and the risk of flooding by sustainable drainage systems (SUDS). The volume and rate of run-off from heavy rainfall can be reduced through the use of SUDS including green and brown roofs, pervious paving and detention ponds or tanks. A condition requiring the approval of details of such a system would be a requirement of any planning approval.

Air Quality

- 6.3 The development site would introduce new residential uses in close proximity to the Euston Road. Policy CC4 (air quality) advises that “...developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.”. No details have been submitted alongside the proposals which seek to demonstrate how the scheme would respond to local air quality and mitigate its impact on future residents. Any proposal for an acceptable development of this nature on the site would be required to demonstrate its Air Quality measures and further details/implementation of those measures would be secured by condition.

7. Transport

- 7.1 Policies T1, T2, T3, T4 and CPG7 are relevant with regards to transport and highways issues.

Car Parking

- 7.2 The site has a PTAL of 6b and is well served by public transport being located within walking distance of Euston and Kings Cross underground and overground stations and within close proximity to local bus stops. In order to ensure that staff, visitors and occupiers of the proposal 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.

Cycle Parking

- 7.3 Policy T1 of the Camden Local Plan requires developments to sufficiently provide for the needs of cyclists and it would ideal for the student accommodation to aspire to these standards. Camden’s minimum cycle parking standards are contained in Appendix 2 of the Camden Development Policies document. The London Plan also provides guidance on minimum cycle parking standards and these are outlined in Table 6.3.
- 7.4 The five proposals were all submitted with the same extent of cycle parking at basement level. In response to officer queries about the extent of provision the applicant added further cycle parking at basement level -2, replacing a plant room. The cycle stores would be accessed by a lift to the rear from both Coburg Street and Drummond Street. The principle of cycle parking in the basement is not considered to be the optimal approach, as the focus of policy is on the provision of cycle facilities which promote and support ease of access and regular use. However a single level of basement cycle parking was found to be acceptable in the previous application, where a ramp at a gradient of 1:20 was provided and the lifts were designed to be 2m x 2m to allow sufficient space for bike access. In the current applications the second level of cycle parking addresses the need for increased cycle numbers, but demonstrates little regard for supporting ease of access. However it is considered that the issue of having cycle parking on two levels could be addressed as part of any acceptable proposal thorough the use of a suitable management

plan, Conditions requiring details of secure and covered cycle storage area and facilities for the requisite minimum of spaces would be added to any acceptable permission.

Travel Plan

- 7.5 Policy T1 seeks to promote sustainable development and 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.
- 7.6 Policy A1 seeks to secure Travel Plans to promote the use of sustainable transport by future visitors and workers within the development. This would be updated by the developer or student accommodation and commercial use operators on a regular basis if the development were built and occupied, with travel surveys of staff and visitors being carried out in the first, third and fifth year of occupation. The final Travel Plan for any acceptable scheme would be secured along with a monitoring and administration contribution by way of a S106 legal agreement.

Management of Construction Impacts on the Public Highway in the local area

- 7.7 Policies A1 and T4 state that Construction Management Plans (CMP) should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Policy T3 relates to how a development is connected to the highway network. For some development this may require control over how the development is implemented (including demolition and construction) through a CMP.
- 7.8 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 CMP together with a financial contribution to cover the cost of reviewing it would therefore need to be secured by way of a S106 legal agreement.

Highway works

- 7.9 Policies A1 and T3 require developments to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'. The footway directly adjacent to the site on Coburg Street and Drummond Road could be damaged as a direct result of the proposed works.
- 7.10 The Council would therefore need to secure a financial contribution for highway works by way of a S106 legal agreement.

Wider Transport Infrastructure

- 7.11 Policies A1 and T3 require development to address transport impacts and require mitigation measures where necessary.
- 7.12 The proposals at the site will introduce a significant number of new pedestrian and cycling trips the applicant is required to help mitigate and manage the safe travel of the future occupiers to the site. A financial contribution for the improvements to the transport and the public realm within the close proximity to the site will be required. This will in turn improve the safety of travel by sustainable transport modes. We would seek a financial contribution based on a pro-rata increase above the £50,000 (required for the 123 bedspace proposals) of £54878, £57723, £60569, £63414 for the 6 to 10 storey proposals respectively, as a section 106 planning obligation.

Refuse and recycling

- 7.13 Policies CC5 and CPG1 are relevant with regards to refuse and recycling storage. Full details of refuse storage areas for both the commercial and student accommodation parts of the proposal would be secured in a Delivery and Servicing Management Plan by way of a S106 legal agreement.

8. Impact on Local Public Open Space

- 8.1 The protection and improvement of local open spaces is supported by policy A2. The development would result in an increased demand for and use of local public open spaces including Euston Square Gardens which is located close to the site. In accordance with the Council's methodology for calculating development contributions for student accommodation in CPG 8, a financial contribution towards open space would be secured by s106 legal agreement as part of any acceptable development.

9. Conclusion

- 9.1 The principle of a mixed use commercial and student housing development on the site is supported within this sustainable location close to local services and amenities.
- 9.2 The five proposed developments each seeks to incrementally add to the bulk, massing and intensification of the development which was certified as being appropriate alternative development under reference 2018/1809/P. The five iterations have been submitted without any significant additional justification or assessment of impact. They are each unresolved in their approach to reconciling the internal living arrangements introduced at the upper floors to the external elevations, which are incongruous in form and appearance. The additional height and massing of the 5th to 9th floors would be of harm to the local townscape, heritage assets and local views, without any significant public benefit and would be refused on principle.
- 9.3 The student numbers accommodated by the incremental schemes (ranging from 12 more bedspaces than the certified 2018/1809/P scheme to 40 more) have been added without sufficient consideration of the incremental need for more high quality living accommodation and communal facilities such as social spaces and well considered cycle parking. Overall the proposals are unconvincing in terms of the quality, and in any circumstance where the additional height and massing were acceptable, each of the 5 schemes would require amendments and improvements to make them acceptable. However, as with the many other considerations identified within this assessment, such as Air Quality, Noise impact, Energy and Sustainability, it is considered that there is likely to be an acceptable development response to meet the requirements of the relevant policy and therefore the concerns do not supplement the primary principle objection to the five proposals, which are matters of height, bulk and design.

S106 Obligations

- 9.4 In accordance with policy DM1 and Camden's Planning Guidance 8 Planning Obligations, (which provides more detail in relation to the thresholds and calculations for contributions) the following matters would need to be secured by section 106 legal Agreement as part of the grant of any planning permission which would be granted. In the event of a planning application for each or any of the five iterations hereby assessed (which for the avoidance of doubt would be refused for the substantive reason set out above) the Council would

require the applicant to enter into a s106 legal agreement to secure mitigation measures according to the following CIL Regulation 122-compliant heads of terms:

- The proposed Student Housing being formally tied to one or more Higher Education Funding Council for England Institutions based in LB Camden or an adjoining borough by way of a nominations agreement OR
- The proposed Student Housing shall only be occupied by students attending a Higher Education Funding Council for England Institution based in LB Camden or an adjoining borough, and 33% of the Student Housing shall be provided as affordable student housing in accordance with the Mayor's Housing SPG 2016 and Policy H9 of the Camden Local Plan 2017.
- Delivery and Service Management Plan;
- Demolition and Construction Management Plan;
- A financial contribution of £7,260 to cover the cost of reviewing the Construction Management Plan;
- 'Car Free' development for both the residential units and the commercial unit;
- Local employment and apprenticeship retention and a local procurement code;
- Energy Efficiency and Renewable Energy Plan and Sustainability Plan to secure compliance with BREEAM Multi Residential Scheme 'Excellent and connection to a decentralised local energy network (future proof for connection and exploring the possibility of connecting to Netley School (Regents Park) and HS2 being secured);
- Student Management Plan;
- Highways Contribution of £10,000 to cover any repair works and improvements to the local highway;
- Travel Plan including monitoring fee of £6,244 to cover the costs of monitoring and reviewing the Travel Plan for a period of 5 years; and
- Basement Impact Assessment compliance.
- A financial contribution towards local public open space.
- A financial contribution towards pedestrian, cycling, environmental and public realm improvements in the local area to improve the safe travel by sustainable means for future occupiers of the site

10. Recommendation

In the case of each of the 5 applications certify that certificate reference 2018/1809/P describes development that is appropriate alternative development in respect of the application site. Each of the 5 proposals exceed the maximum development parameters for the site described in that certification.