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Our ref: 2019/5658/PRE
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Dear Mr Fox,

Re: Warren Court, Euston Road, NW1

Thank you for submitting a pre-planning application enquiry for the above property which was received on 31/10/2019 together with the required fee of £3,708.81 on 19/11/2019. This pre-application advice is based on revised drawings received 10/01/2020 which were submitted following our meeting and discussions of the proposals on 13/12/2019.

1. Drawings and documents

Existing and proposed drawings and design document received 31/10/2019 and revised drawings received 10/01/2020.

2. Proposal

To partially demolish the existing flat at sixth floor level and provide an enlarged sixth floor comprising four flats (3 x studios and 1 x one bedroom unit).

3. Site description

The application site is located on the south-west corner of the junction between Euston Road and Tottenham Court Road. The ground floor and lower levels of the application site comprise Warren Street London Underground Station. The building is six storeys with a part-seventh storey. The upper floors of the building comprise residential accommodation.

The surrounding area is made up of predominantly commercial uses on each corner of the intersection apart from the University College Hospital building to the east of the site. The north of the site is bordered by Euston Road with the Euston Tower on the northern side of the road, Tottenham Court Road runs to the east of the site, and Warren Street to the South as well as the northern boundary of the Fitzroy Square Conservation Area which encompasses properties on the south side of Warren Street.

The site is not within a conservation area but abuts the northern boundary of the Fitzroy Square conservation area. The site is approximately 50m to the east of the Grade II terrace of listed buildings (and attached railings) on the northern side of Warren Street (Nos. 63-68), which provide a more intimate, lower scale than that of the application site.

4. Relevant planning history

2016/5317/P - Erection of two storey roof extension comprising 2 x 3-bed units following demolition of existing single storey roof extension. Refused 17/02/2017 and dismissed at appeal on 16/10/2017. The application was refused by the LPA for the following reasons:

- The proposed extension, by virtue of its size, bulk, location and design, would appear as an incongruous addition resulting in harm to the character and appearance of the host building and surrounding townscape, including the adjacent conservation area, and the setting of the adjacent listed buildings contrary to policy CS14 (Promoting high quality places and conserving heritage) of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 (Securing high quality design) of the London Borough of Camden Local Development Framework Development Policies.
- The proposed development, by virtue of its height, location and bulk would cause an unacceptable loss of daylight, sunlight and outlook to neighbouring residential occupiers contrary to policy CS5 (Managing the Impact of Growth and Development) of the London Borough of the Camden Local Development Framework Core Strategy and policy DP26 (Managing the Impact of Development on Occupiers and Neighbours) of the London Borough of Camden Local Development Framework Development Policies.
- The lack of cycle parking provision would discourage the ownership and use of cycles in what would be required to be a car-free development, contrary to Policy CS11 (Promoting sustainable and efficient travel) and policies DP18 (Parking standards and limiting the availability of car parking) of the London Borough of Camden Local Development Framework Development Policies.
- The proposed development, in the absence of a legal agreement to secure a Construction Management Plan, would fail to secure adequate provision for and safety of pedestrians and protect their amenity, contrary to policies CS5 (Managing the impact of growth and development) of the London Borough of Camden Local Development Framework Core Strategy and policies DP20 (Movement of goods and materials), DP21 (Development connecting to highway network) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.
- The proposed development, in the absence of a legal agreement to secure car-free housing for the residential units would be likely to contribute unacceptably to parking stress and congestion in the surrounding area, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP18 (Parking standards and the availability of car parking) of the London Borough of Camden Local Development Framework Development Policies.

5. Relevant policies and guidance

[National Planning Policy Framework 2019](#)

[The London Plan March 2016](#)

[The Draft London Plan](#)

[Camden Local Plan 2017](#)

Growth and spatial delivery

Policy G1 Delivery and location of growth

Meeting housing needs

Policy H1 Maximising housing supply
 Policy H3 Protecting existing homes
 Policy H4 Maximising the supply of affordable housing
 Policy H6 Housing choice and mix
 Policy H7 Large and small homes

Community, health and wellbeing

Policy C5 Safety and security
 Policy C6 Access for all

Protecting amenity

Policy A1 Managing the impact of development
 Policy A3 Biodiversity
 Policy A4 Noise and vibration

Design and Heritage

Policy D1 Design
 Policy D2 Heritage

Sustainability and climate change

Policy CC1 Climate change mitigation
 Policy CC2 Adapting to climate change
 Policy CC3 Water and flooding
 Policy CC4 Air quality
 Policy CC5 Waste

Transport

Policy T1 Prioritising walking, cycling and public transport
 Policy T2 Parking and car-free development
 Policy T3 Transport infrastructure
 Policy T4 Sustainable movement of goods and materials

Delivery and monitoring

Policy DM1 Delivery and monitoring

[Camden Planning Guidance](#)

CPG Interim Housing 2019
 CPG Housing 2019
 CPG Design 2019
 CPG Amenity 2018
 CPG Transport 2019
 CPG8 (Planning obligations (July 2015, updated March 2018).

Fitzrovia Area Action Plan 2014**6. Assessment**

The principle planning considerations are considered to be the following:

- Creation of additional housing.
- Dwelling mix

- Affordable housing
- Standard of accommodation
- Design and Heritage
- Neighbouring amenity
- Transport considerations
- Energy and Sustainability
- CIL

7. Creation of additional housing

The proposals involve the creation of approximately 118 sqm of new residential floorspace to provide four new residential flats. Housing is regarded as the priority land use of the Local Plan, and the Fitzrovia Area Action Plan promotes the development in Fitzrovia of permanent self-contained housing including affordable housing. Given the new residential units would be in addition to the existing flats in the building, the proposed development would be appropriate in this location. As such, the development would be compliant with Policy H1 provided the units meet Council and national residential development standards and the development did not harm local amenity.

8. Dwelling mix

The Council requires development to contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes. Policy H7 of the Local Plan includes a Dwelling Size Priorities Table as set out below:

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

Where possible, a mix of large and small homes should be provided for all tenures. Two and three bedroom homes are the highest priority for market housing in Camden.

The development would provide 3 x studio flats and 1 x 1 bedroom flat which are lower priority dwelling sizes in the borough and would not be compliant with policy H7. During our pre-application meeting, this unit mix was justified on the basis that the majority of occupants within the existing building are single tenants, many of whom either work in the city or in the nearby UCH building and the fact that the site is located on a busy intersection.

Nevertheless, planning records would suggest that the existing building provides a range of dwelling sizes, including one, two and three bedroom flats, and it is considered that there is scope to provide a two bedroom flat within the proposed mix. It is strongly advised that some larger units are provided to meet policy requirements and the Council's housing priorities.

9. Affordable housing

Policy H4 requires a proportion of the housing provided to be affordable in accordance with the sliding scale. Targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home.

Targets are applied to additional residential floorspace proposed.

A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing. Payments-in-lieu are derived by calculating the affordable housing floorspace required, and converting this to a payment using a 'cost' per sqm.

Based on the 'existing and proposed area comparison plan', I measure the proposed uplift to be approximately 118 sqm. I will use this figure for the purposes of the calculations below, but please calculate the proposed GIA and provide these details as part of any future planning application. Based on the creation of 118 sqm (GIA) residential floorspace, the sliding scale in this instance would require a provision equal to 2% of the total C3 floorspace (expressed in GEA).

The Council's current adopted multiplier for calculating a payment-in-lieu within market residential schemes is £2,650 per sqm (based on GEA). This provides an overall requirement of £7817.50 based on the creation of 147.5sqm GEA of residential floorspace (using a GIA to GEA conversion of 1.25). This financial contribution would need be secured via a S106 legal agreement (if the proposal were acceptable in all other regards).

Additional residential floorspace (GIA)	Capacity (rounded floorspace addition/ 100sqm)	AH % target (capacity x 2%)	Estimated GEA (GIA x 1.25)	AH floorspace target (% target x GEA)	Payment in lieu (floorspace target x £2,650).
118 sqm	1 additional home	2%	$118 \times 1.25 = 147.5$	$2\% \times 147.5 = 2.95$	$2.95 \times £2,650 = £7817.50$

You are advised to provide a GEA figure with any future planning application as the GIA to GEA conversion can provide an overinflated figure. More detailed information regarding the calculation of off-site provision and payments in lieu, including a formula for the 'cost' per sqm, is provided in CPG Interim Housing.

10. Standard of accommodation

The development would provide 3 x studio units and 1 x one bedroom flat of the following sizes:

- Unit 1 – Studio flat 39m² GIA
- Unit 2 – Studio flat 40m² GIA
- Unit 3 – Studio flat 40m² GIA
- Unit 4 – 1 bedroom flat 57m² GIA

All units would meet the nationally described space standards of 39sqm for a 1 bedroom, 1 person studio and 50sqm for a 1 bedroom, 2 person flat.

Unit 1 would be dual aspect, with shower room and access to a fairly large outside terrace space. Unit 4 would be the largest unit, with separate bedroom and ensuite, dual aspect, and outside terrace. At 11.37sqm, the bedroom would be just below the required space standard of 11.5sqm. Given that this floorspace includes an element of unusable space to the entrance of the room, it is suggested the room layout is reconfigured and the ensuite reduced in size to provide a more usable, higher quality bedroom.

Units 2 and 3 would both be studio units with only unit 3 benefitting from a dual aspect. At 39 and 40sqm, they would meet the minimum space standards; however, in line with the comments regarding dwelling sizes above, it is recommended that the layout is re-considered to provide a larger 2 bedroom unit.

The units appear to benefit from adequate outlook, but the drawings suggest there may be overlooking and a loss of privacy between flats – particularly units 1 and 4. It is suggested that additional floorplans are provided with any future planning application, to determine if there would also be overlooking of neighbouring windows.

Although the sixth floor flats do not benefit from lift access at present, it is suggested that the extension of the lift core upwards to serve this floor is explored.

11. Design and heritage

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Camden's Local Plan is supported by CPG (Design) and the Fitzrovia Area Action Plan which requires new development to respond positively to the prevailing form of nearby buildings and frontages in terms of scale and grain.

The pre-application proposals involve the partial demolition and extension of the existing sixth floor, to create four new flats, including associated internal alterations to existing staircases and circulation areas. The design statement submitted with the proposals describes the new extension as maintaining the height of the existing sixth floor, set in from the main facades, and designed to match the existing building in terms of height, massing, materiality and detail. During our initial pre-application meeting, concern was expressed as to the proposed materiality (which differed between documents and in some did not match the existing building) and the solid to glass ratio of the extension and whether this was in keeping with the floors below. It was also requested that additional views were provided to enable a fuller assessment of the impact of the proposals on the host building and surrounding area.

Following this, revised drawings were provided which made the following amendments:

- Reduction in height of the west facing section of the building.
- Alterations to fenestration pattern.
- Confirmation of proposed materials.
- Reduction in height of eastern projecting element.
- Additional views provided.

The revised proposals were presented to the Council's internal design surgery. Although the principle of the extension of the existing 6th floor is accepted and the revised design is considered to be an improvement on the initial proposals, concerns were raised during the meeting that sufficient analysis of the existing building had not been completed in order to inform the proposed design, and it was considered that further refinement is necessary. Officers would emphasise that this is an important building, worthy of being locally listed, in a very prominent location between Euston Road, Kings Cross, the Knowledge Quarter, the West End Project and the Euston redevelopment. This is an important point in time for this area, and the Council expects high quality architectural thought and outcome. There is

concern that the current proposals do not show sufficient interrogation of the existing building's value. This is exemplified by the 'Design Principles – External Building Materials' document which seems to reference a number of unknown corporate buildings rather than the host building itself. You are advised to not only examine the architect Holden's work, but look into what influenced him, in particular, the Deco/Moderne movements. Any proposal should pick up on existing detailing and enhance the building. It is also questioned whether full height Crittal glazing would meet building regulations. The use of matching materials and the aim of providing an extension that referenced the existing building is welcomed in principle, but the current proposals are not considered to be of a sufficient quality at present.

In terms of the massing and proportions, the proposed extension appears rather clumsy, although it is recognised that the proportions of the existing plan do not help the proposal. It is recommended that the building lines of the extension are straightened so as to marry up with the building line of the host building. You may also want to consider rounding these corners as you have done to the front elevation. In addition, it is recommended that the two new elements of massing to the north east and south east corners are removed to retain the massing to the front elevation. The projecting bay feature is a positive addition and the amendment to reduce its height is welcomed. Although care has been taken to retain the height of the existing extension, it is suggested that you explore extending the cores to provide lift access to the 6th floor. The additional height of the lift cores could be acceptable providing they were sensitively designed.

In conclusion, the principle of the extension of the existing sixth floor is considered acceptable; however, it is recommended that further work is carried out to the proposed massing, layout and detailed design of the extension, informed by an exploration of Holden's work and influences. We consider that any further iteration should be supported by, for example, an axonometric drawing at larger scale and/or bay studies to more clearly explain the form and detailed design of the building.

12. Neighbouring amenity

Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.

Principle 9 of the Fitzrovia Area Action Plan also sets out that the Council will have regard to the particular impacts on residential amenity that arise from the dense mix of land uses in Fitzrovia, and will seek: a good standard of amenity for all existing and future occupants of land and buildings; and to prevent cumulative harm to residential amenity from noise, mechanical ventilation, light pollution, deliveries and waste collection.

The nearest neighbouring dwellings appear to be to the lower floors of Warren Court, and the neighbouring building 295 Euston Road to the west.

One of the reasons for refusal of the previous application reference 2016/5317/P was due to the unacceptable loss of daylight, sunlight and outlook from neighbouring residential windows to the lower floors of Warren Court and 295 Euston Road. The current pre-application proposals have been reduced in scale and pulled back from the western boundary in order to try to minimise these impacts.

During the pre-application meeting, it was discussed that a revised daylight and sunlight assessment had been prepared and the design team were satisfied that the impacts to neighbouring daylight were considered acceptable. The Council has not had sight of this report, and as such, will form as assessment at application stage. You are advised to include a range of daylight and sunlight assessments such as the average daylight factor (ADF),

annual probable sunlight hours (APSH) and no-sky line (NSL), and not just the Vertical Sky Component (VSC) test as was submitted with the previous application.

Due to the distance between the proposed flats and the existing residential dwellings at 295 Euston Road of less than 18m, it is proposed to erect privacy screens to prevent overlooking between flats. Although these are likely to be sufficient in preserving privacy, their impact on light levels and outlook should be considered as part of any application and included within the daylight assessment.

13. Transport considerations

Cycle Parking

Given the site constraints and the fact that the proposal is to construct a rooftop extension above an existing building, the cycle facilities policies would not apply to this development.

Car-free

The development would need to be car-free in accordance with Policy T2. This would be secured by a legal agreement if planning permission is granted, and would prevent future occupiers from obtaining on-street parking permits. The Council secures car-free agreements through Section 16 of the Greater London Council (General Powers) Act 1974, s111 of the Local Government Act 1972, and s1(1) of the Localism Act 2011. We are using these Acts in addition to s106 of the Town and Country Planning Act (rather than instead of).

Construction Management Plan

To ensure that the impacts of the development, both internal and external to the site, are adequately mitigated and managed, a draft Construction Management Plan (CMP) would therefore need to be submitted in application stage and a detailed CMP would need to be secured via a Section 106 planning obligation if planning permission is granted. This would be based on Camden's established CMP pro-forma. A CMP implementation support contribution of £3,136 would also need to be secured as a Section 106 planning obligation if planning permission were to be approved.

Works to the Highway

We may seek to secure a highways contribution for repairs to the public highway directly adjacent to the site (Warren Street) as a section 106 planning obligation in accordance with Policy A1, if a subsequent planning application were to be approved. As the development is also partially located on the Transport for London Road Network (TLRN) (Euston Rd and Tottenham Court Rd), TfL may request a highways contribution.

Cumulative Impact Areas

The Council has recently commenced consultation on a Cumulative Impact Area Statement. Officers across several disciplines in the Council have developed a list of enhanced requirements they believe are necessary to mitigate the additional impacts brought about when several sites commence work in close proximity to one another. It is proposed that it is reasonable to increase what we ask of developers (and their contractors) in such areas, whether by way of increased environmental standards, improved communication liaison requirements, the conduct of site operatives or hours of construction.

The Council intends to trial these requirements in the Central London area of Camden. Should the process prove successful, the intention is to explore other possible Cumulative Impact

Areas it in other parts of the Borough, guided by where the impacts of construction are most significant. Further details are available on the Council's website [here](#).

Summary

Should a full application be made it would need to be supported by a draft Construction Management Plan. It is likely that a planning consent would need to be supported by the following S106 planning obligations:

- Car free development
- Construction Management Plan and associated Implementation Support Contribution
- Highways Contribution (The Council)
- Highways Contribution (TfL)

14. Energy and sustainability

In line with policies CC1, CC2 and CC3 of the Camden Local Plan 2017, all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage. An application of this scale would be required to submit an Energy and Sustainability Statement.

In particular, policy CC1 (a) promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy (Be lean, Be clean, Be green).

All new residential development will be required to demonstrate a 19% CO₂ reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy). This can be demonstrated through an energy statement or sustainability statement.

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site. Residential developments will be expected to meet the requirement of 110 litres per person per day (including 5 litres for external water use).

15. CIL

The scheme would be liable to pay Community Infrastructure Levies for both the Mayor of London and the London Borough of Camden CIL. The Mayor's CIL will apply to all development that adds one or more dwellings or more than 100sqm of floorspace at a rate of £50 per sqm.

The Council's CIL will equally apply at a rate of £500 per sqm in the Zone A area. Please refer to the Council's website for further information on the Borough's CIL.

16. Conclusion

The extension of the existing extension to provide additional residential dwellings is considered acceptable in principle; however, there are concerns in terms of the layout and detailed design of the extension, and it is recommended that further exploration is carried out to inform the design of the extension. You are also advised to re-consider the proposed layout to provide a two bedroom dwelling.

17. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – full planning application
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red
- Existing and proposed floor plans, roof plans, elevation drawings and section drawings
- CGI views of proposed extension
- Design and access statement including heritage assessment
- Sample photographs/manufacturer details of proposed materials
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

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

If you have any queries about the above letter or the attached document please do not hesitate to contact Laura Hazelton on the number above.

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

Yours sincerely,

Laura Hazelton

Senior Planning Officer
Planning Solutions Team