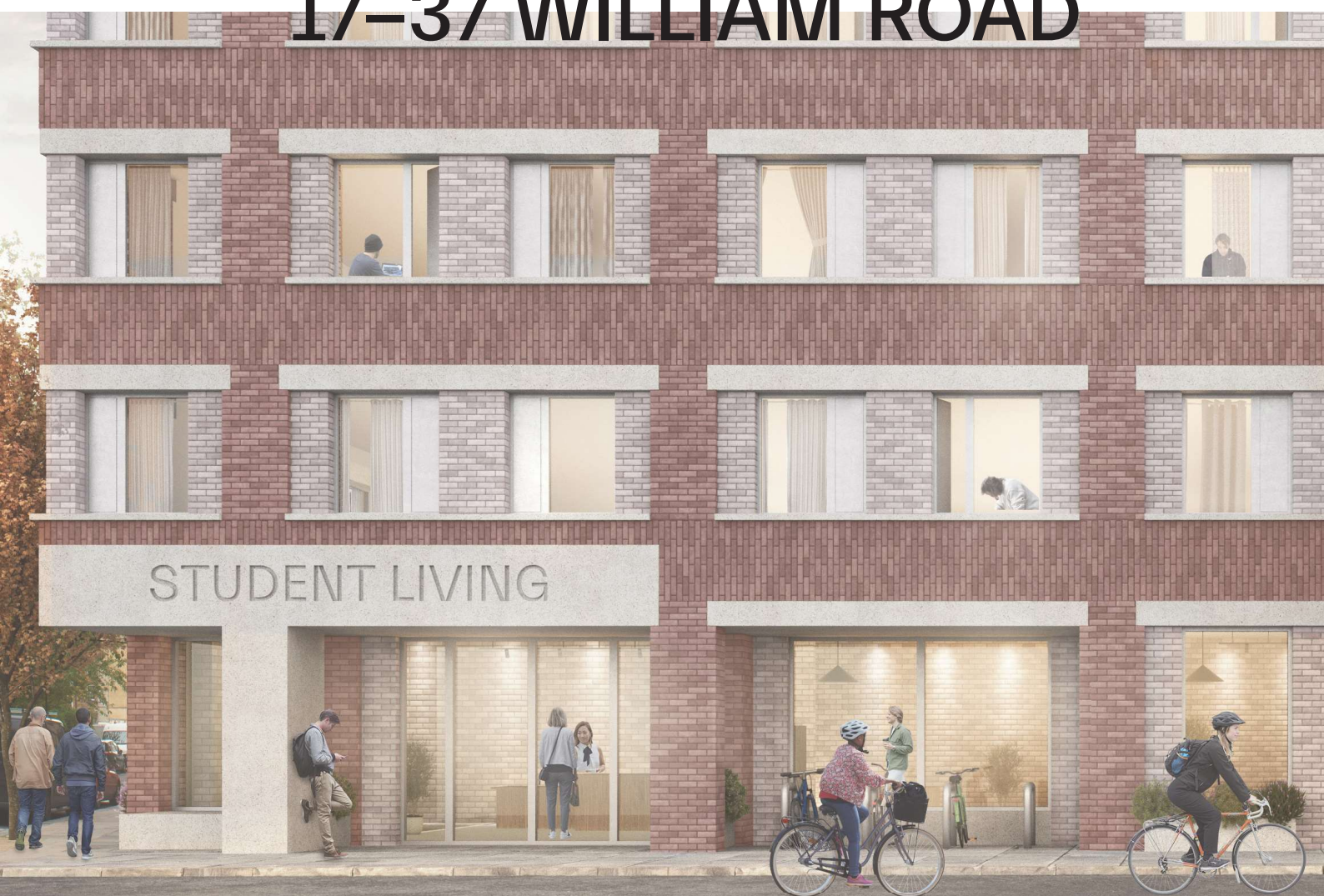


17-37 WILLIAM ROAD





17-37 William Road

PLANNING STATEMENT

November 2020

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APPENDIX 1 – PLANNING HISTORY

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Limited ('DP9') on behalf of Euston One Limited ('the Applicant') in support of an application for full planning permission ('the Application') for the redevelopment 17-37 William Road, London, NW1 3ER ('the Site').

1.2 The Application relates to proposals for comprehensive redevelopment of the Site to provide an exemplary quality, mixed-use scheme comprising student accommodation and affordable workspace, which will be delivered alongside public realm improvements. The description of development ('the Proposed Development') is set out below:

'Redevelopment of no. 35-37 to provide a 15 storey building with basement level for use as student accommodation, with affordable workspace at ground floor level of no. 17-37 and improvements to ground floor façade of no. 17-33, together with public realm improvements, servicing, cycle storage and facilities, refuse storage and other ancillary and associated works.'

1.3 The Proposed Development will play an important role at both the strategic and local level, resulting in a development of the highest architectural quality which will contribute to the vision for the regeneration of the Euston area. The project architect, Morris + Company, is an award-winning practice with an outstanding track record designing exemplary schemes across London, particularly in Camden.

1.4 The submission of this Application follows extensive discussions with a wide range of stakeholders and statutory consultees, including (but not limited to) the London Borough of Camden ('LBC'), the Greater London Authority ('GLA'), Historic England, Transport for London ('TfL'), local residents, amenity groups and other stakeholders.

1.5 This Planning Statement should be read and considered in conjunction with the plans and drawings submitted as part of this Application, together with the following supporting documents:

- Planning Application Form and Ownership Certificate, prepared by DP9 Ltd;
- CIL Additional Information Form, prepared by DP9 Ltd;
- Existing & Proposed Drawings (see Drawing Register), prepared by Morris + Company;
- Design and Access Statement, prepared by Morris + Company;
- Air Quality Assessment, prepared by Air Quality Consultants;
- Statement of Community Involvement, prepared by Kanda;
- Daylight and Sunlight Assessment, prepared by Point 2;
- Energy and Sustainability Statement, prepared by Vitec;
- Fire Strategy, prepared by JGA;
- Phase 1 Geoenvironmental Report, prepared by IESIS Structures;
- External Building Fabric Noise Assessment, prepared by Hann Tucker;
- Environmental Noise Survey, prepared by Hann Tucker;
- Plant Noise Assessment, prepared by Hann Tucker;
- Townscape, Visual and Built Heritage Assessment, prepared by Tavernor Consultancy;

- Student Travel Plan, prepared by Caneparo Associates;
- Framework Commercial Travel Plan, prepared by Caneparo Associates;
- Delivery and Servicing Management Plan, prepared by Caneparo Associates;
- Construction Management Plan, prepared by Caneparo Associates;
- Transport Assessment, prepared by Caneparo Associates;
- Employment and Training Strategy, prepared by Storey Consulting;
- Basement Impact Assessment, prepared by IESIS Structures;
- Student Housing Management Plan, prepared by Homes for Students;
- Flood Risk Assessment, Drainage Strategy and SuDS Assessment, prepared by IESIS;
- Health Impact Assessment, prepared by WSP;
- BREEAM Pre Assessment, prepared by Vitec;
- Wind Assessment, prepared by Thornton Tomassetti; and
- Employment Land Statement, prepared by Grant Mills Wood.

1.6 This Planning Statement provides an overview of the Site, the Proposed Development, and an evaluation of the Proposed Development against planning policy and guidance. It is structured as follows:

- Section 1 provides an introduction and scope;
- Section 2 describes the Site and the context of the surrounding area;
- Section 3 provides a description of the Proposed Development;
- Section 4 provides an overview of the pre-application advice received;
- Section 5 sets out the relevant national, regional and local planning policies relevant to the Application;
- Section 6 provides an assessment of the Proposed Development against key planning policies;
- Section 7 sets out the draft Section 106 Heads of Terms;
- Section 8 sets out the overall conclusions.

1.7 Overall, the Site represents an excellent opportunity to deliver a scheme which optimises the development potential of an underutilised brownfield site, resulting in the provision of a significant quantum of student accommodation and affordable workspace, alongside high-quality public realm enhancements which will significantly improve the existing Site and surrounding area.

2.0 SITE & SURROUNDING AREA

The Application Site

- 2.1 The 0.21 ha Site comprises two adjoining buildings situated to the south of William Road and east of Stanhope Street in the London Borough of Camden. The Site is bound to the south by the rear of a UCL student accommodation building, known as Schafer House, and is bound to the east by an adjoining office building at no. 11-15 William Road.
- 2.2 No. 33-37 ('Plot A') comprises a dated part two-storey, part six-storey 1960s office building with a basement level, situated on the corner of William Road and Stanhope Street. The building is of very poor architectural quality and detracts from the surrounding area, with extensive inactive frontages along Stanhope Street and William Road. The building is currently vacant and is in a state of disrepair.
- 2.3 No. 17-33 ('Plot B') adjoins Plot A to the east and comprises a seven-storey building, constructed in 2000-2001. The existing ground floor comprises office accommodation with a glazed frontage onto William Road, and an extensive area of ancillary office storage space to the rear formerly used as a vehicle workshop. The ground floor of the building is currently vacant however, the upper floors of the building are occupied in Class C3 residential use. It is important to note that the residential element is to be retained as existing and does not form part of the Proposed Development.
- 2.4 The Site is located within the Euston Opportunity Area and Central London Area, both of which serve an important economic function in the future growth of Euston and London as a whole.

Surrounding Area

- 2.5 The Site is situated in a transitional location which is characterised and defined by a rich mix of uses, building scales and typologies. In terms of land use, the context of the surrounding area is characterised by both the commercial nature of Drummond Street to the south and Euston to the east, and the residential character of Stanhope Street and the Regents Park Estate to the east and to the north. In the immediate context, there are neighbouring residential uses to the north, to the west and to the south of the Site.
- 2.6 Building heights in the surrounding area vary significantly, from the neighbouring 4 storey buildings along William Road and Stanhope Street, rising to the 20-storey residential towers (circa. 54m) in the Regents Park Estate to the west and Euston Tower to the south, which extends to 36 storeys (124m).
- 2.7 The wider context, including Euston Station and the surrounding area, is proposed for transformational regeneration, reflecting the Station's status as one of London's key railway termini. This work is now partly underway with works for HS2. The Regents Place regeneration to the south along Drummond Street is largely complete, with commercial-led mixed-use buildings extending up to 36 storeys.

- 2.8 The Site is not located within a Conservation Area however, nos. 48 – 52 Stanhope Street to the south are Grade II listed. The Site is also located within the Landmark Viewing Corridor of LVMF View 2A.2 (Parliament Hill Summit to the Palace of Westminster) and is within the background Wider Setting Consultation Area of LVMF View 5A.2 (Greenwich Park to St. Paul's Cathedral).

Accessibility

- 2.9 Pedestrian access to the Site is currently provided from both William Road and Stanhope Street, with vehicular access to an existing substation within the Site provided from an opening between both plots on William Road.
- 2.10 The Site benefits from the highest Public Transport Accessibility Level (PTAL) rating of 6b, largely attributed to its close proximity to a number of London Underground stations, including Great Portland Street Station (0.3 miles to southwest), Warren Street Station (0.3 miles to south) and Euston Square Station (0.3 miles to southeast). Euston Station is also situated 0.4 miles to the west, which is served by National Rail services, London Overground services and London Underground Northern line and Victoria line services. Euston Bus Station, located adjacent to the railway station, is served by numerous bus routes.
- 2.11 The Site is also highly accessible to cyclists, with both Hampstead Road and Euston Road to the east served by designated TfL Cycleways. The closest Santander Cycle Hire stand is located to the southeast on Hampstead Road.

Planning History

- 2.12 Planning permission was originally granted in July 1958 (Ref: TP79387/23003) for redevelopment of the Site to provide a part seven-storey, part single-storey building for use as a garage, workshop and workrooms. In March 2000, planning permission was granted via appeal (Ref: PS9804631) for the redevelopment of no. 17-33 to provide a six-storey building with one light industrial unit (Class B1c) on the ground floor and 46 flats (Class C3) on the upper floors, including 12 flats for social housing. The Site has since been subject to a number of planning applications relating to minor internal and external alterations to the existing buildings.
- 2.13 Most recently, planning permission was granted in December 2015 (Ref: 2015/5721/P) for the change of use of the ground floor of no. 17-33 from storage (Sui Generis) to office (Class B1a), installation of two air-conditioning units and replacement of the garage door with new office doors. A Certificate of Lawfulness was subsequently issued by LBC in December 2018 (Ref: 2018/5596/P) confirming that planning permission 2015/5721/P was implemented through works to the front elevation however, it is clear from internal inspection of the property (as evidenced by the photographs of the existing building included in the supporting Design and Access Statement, prepared by Morris + Company) that the storage area which was subject to the change of use has not been altered to accommodate the consented office use. A full schedule of the available planning history has been included in Appendix 1 for reference.

3.0 PROPOSED DEVELOPMENT

- 3.1 This section should be read in conjunction with the proposed drawings and Design and Access Statement, prepared by Morris + Company, which are submitted to accompany the Application and describe the principal components of the Proposed Development.

Summary of Proposed Development

- 3.2 The Proposed Development will transform an underutilised brownfield site through the provision of student accommodation and affordable workspace, alongside public realm improvements, in a high-quality development that will act as a catalyst for the continued regeneration of and investment in the surrounding area. A summary of the proposed works is set out below:

- Demolition of no. 35-37 and redevelopment of the site to provide a student accommodation-led scheme, designed by award-winning practice Morris + Company, comprising a 15-storey building with basement level;
- Retention of no. 17-33 and provision of a 1,255 sqm (GIA) of affordable workspace at ground floor level, delivered alongside improvements to the existing ground floor façade, providing active frontages along William Road;
- Provision of 168 high-quality student units (239 bedspaces), including 84 affordable bedspaces (35% of overall total), alongside a series of internal and external communal amenity spaces;
- Delivery of public realm improvements along William Road and Stanhope Street, including planters and trees, providing an enhanced pedestrian experience;
- Provision of 36 sqm (GIA) of replacement ancillary residential storage space serving existing residents within no. 17-33 and a replacement electricity substation;
- Provision of secure cycle parking in line with emerging London Plan standards; and
- Improved servicing strategy to maximise servicing options.

Land Uses

- 3.3 It is proposed to redevelop no. 35-37 to provide a student accommodation scheme delivering 168 student accommodation units (239 bedspaces in total). This will include 84 affordable student bedspaces, comprising 35% of the overall student accommodation provision, in line with draft London Plan requirements. The proposed student accommodation will comprise a mix of studios and twodios (a dual-occupancy unit with two single bedrooms), which will meet the needs of a range of students. The accommodation will also benefit from a range of internal and external communal amenity spaces, including a lounge area with adjoining outdoor terraces at 14th floor level, an internal amenity space and outdoor courtyard at ground floor level, and a cinema and gym at basement level, resulting in an exceptional level of living standard for future residents.

- 3.4 The design of the proposed student accommodation has been informed by market demand and the requirements of the proposed student accommodation operator, Home for Students, one of the UK's leading providers of student accommodation with an excellent track record of managing high-quality student accommodation across the UK. The Proposed Development will be subject to a commitment from the operator (secured by legal agreement) restricting occupation of the units to full time students from a defined list of higher education institutions within the local area.
- 3.5 A significant benefit of the Proposed Development is the provision of 1,255 sqm (GIA) of affordable workspace. The proposed affordable workspace will be located at ground floor level across no. 17-37, with access via a dedicated entrance on William Road. The floorspace is designed to be flexible and adaptable to meet the needs of a range of potential tenants, including local small businesses and start-ups. The units will benefit from glazed frontages onto William Road and large rooflights to the rear, providing ample natural light into the spaces.
- 3.6 In addition to the proposed student accommodation and affordable workspace, it is proposed to reprovide the existing electricity substation and an existing ancillary residential storage space serving the existing residents of no. 17-33.
- 3.7 A breakdown of proposed floorspace is provided in Table 1 below and a breakdown of proposed student accommodation unit mix is provided in Table 2 below. An assessment of the proposed uses against planning policy is set out in Section 6.0 of this Statement.

Table 1 – Proposed Land Uses & Floor Areas

Use	Use Class	Proposed (GIA sqm)	Proposed (GEA sqm)
Student Accommodation	Sui Generis	6,711	7,546
Affordable Workspace	Class E(g)	1,255	1,338
Residential Storage	Class C3	36	39
Substation	Sui Generis	32	34
Total	-	8,034	8,957

Table 2 - Proposed Student Accommodation

Unit Type	Number of Units	Number of Bedspaces
Studio	94	94
Accessible Studio	3	3
Twodio	71	142
Total	168	239

Proposed Design Approach

- 3.8 The Proposed Development has been subject to a rigorous design process, led by Morris + Company, which has evolved following extensive consultation with LBC officers and other key stakeholders. The proposals will result in the delivery of a 15-storey building extending to 73

metres AOD. The form of the building has been carefully considered and developed, responding to both strategic and local views, as well as the setting of the designated and non-designated heritage assets situated within close proximity to the Site.

- 3.9 A variety of massing approaches have been tested in the development of the design, and the proposed building height has been reduced significantly in response to LBC feedback.
- 3.10 Several steps have been undertaken during design development to ensure the proposed building at no. 35-37 appears as an elegant and contextual addition to the surrounding area. The form has been articulated through the use of shoulders and setbacks which align with the datums of the neighbouring buildings on Stanhope Street and William Road, with a chamfer on the corner which creates a distinct base and body. The proposed building height, at 15 storeys, is considered to represent a height which is clearly subservient to the taller buildings in the wider context, mediating between the existing and emerging tall building context to the south and around Euston Station and the more varied residential scale to the north of the Site.
- 3.11 The proposed detailed design has been informed by robust historical character studies of the Euston area, which have been reflected in the proposed façade design and materiality. The façade design has been informed by the architectural character of the warehouses and the neighbouring listed buildings. The ground and base show wide openings and recessed entrances framed by brick piers and concrete lintels whilst at the upper body, the openings change into a portrait proportion, with full height windows, increasing the vertical expression of the façade and enhancing views from the inside.
- 3.12 The proposed façade will be predominately brick to reflect the local character, with a variation of tonalities on the main piers and recessed pier panels. Concrete will also be used to emphasise the feature architectural details, whilst the crown of the building will be celebrated through the use of extended recessed panels above openings that culminate in a continuous concrete parapet with projecting coping.
- 3.13 The proposed remodelling of the ground floor façade of no. 17-33 will significantly improve the appearance of this element of the building through the addition of dark-coloured, metal-framed windows and surrounds, and the provision of pre-cast concrete planters beneath the existing residential cores.

Proposed Public Realm

- 3.14 Providing a high-quality public realm and an improved pedestrian experience around the Site is one of the key objectives and primary public benefits of the Proposed Development. It is proposed to remove the existing vehicle crossover on William Road to create a continuous footway along William Road and Stanhope Street, which will benefit from the addition of high-quality, durable surface treatment. The addition of recessed ground floor entrances to the Proposed Development will also create additional interest and provide further activation the corner of Stanhope Street and William Road. Tree planting along the Stanhope Street and William Road will further enhance the quality of the pedestrian experience and add much-

needed green character to the surrounding area. The proposed tree species will be carefully chosen to ensure they can thrive within the space provided. Planters will also be provided adjacent to the proposed entrances and the existing residential cores.

Transport

- 3.15 The scheme will provide exemplary cycle facilities for residents, employees and visitors, with a total of 223 secure cycle parking spaces, in accordance with draft London Plan standards. The proposed cycle parking provision will comprise 200 long-stay spaces at ground floor and basement level, with a further 11 short stay (visitor) spaces at ground floor and within the public realm. It is also proposed to reprovide 12 existing cycle spaces serving existing residents within no. 17-33.
- 3.16 In accordance with the draft London Plan and Camden Local Plan, the scheme will be car-free, with no on-street or off-street car parking to be provided.
- 3.17 Given the low number of delivery and servicing trips which will be generated by the Proposed Development, all servicing activity will be undertaken via William Road and Stanhope Street, as per the existing arrangement. This will be managed through compliance with a detailed Delivery and Servicing Management Plan, to be secured via legal agreement or planning condition. Additional footway for servicing activity will be created immediately to the north of the Site along William Road through the removal of the existing vehicle crossover.

Energy and Sustainability

- 3.18 The Proposed Development aims to achieve high standards of sustainability, which has informed the design from an early stage. As set out in the supporting Energy Statement, prepared by Vitec, the Proposed Development will incorporate the use of a number of sustainability measures to minimise carbon emissions, including the provision of all electric air source heat pumps providing central hot water, Variable Refrigerant Flow ('VRF') for heating and cooling amenity spaces, electric panel heaters and Mechanical Ventilation with Heat Recovery ('MVHR') for ventilation. Dedicated low energy lighting will also be provided for all of the internal spaces, consisting of low energy high efficiency fluorescent lamps and LED luminaires.

4.0 PRE-APPLICATION CONSULTATION

- 4.1 This Section should be read in conjunction with the Statement of Community Involvement, prepared by Kanda, which accompanies the Application and explains the public consultation that has been carried out during the pre-application stage. This Section provides an overview of the formal pre-application process with LBC, statutory bodies, and other key stakeholders.
- 4.2 All matters associated with the Proposed Development were discussed at length at the pre-application stage, with early engagement helping to inform the overall scheme design.

Mayoral Referral

- 4.3 The Application is referable to the GLA as it exceeds the development thresholds (in Central London and over 30 metres in height) set out in the Town and Country Planning (Mayor of London) Order 2008 (as amended). In response, formal pre-application engagement has been undertaken with the GLA, with a formal pre-application meeting which took place on 5th May 2020, followed by a formal written response issued on 23rd October 2020.

Pre-Application Engagement

- 4.4 Formal pre-application discussions and design workshops have been held with LBC on the evolving scheme since an initial meeting on 11th September 2019. The meetings have focussed on a number of topics, including the following:
- Land use and layout;
 - Height, massing and townscape;
 - Transport, parking and servicing; and
 - Materiality and detailed design.
- 4.5 In total, six pre-application meetings and site visits have been held with LBC officers to develop the scheme design and address any issues raised. In response to LBC feedback and through the evolution of the proposed design, the proposed building height and massing has been altered significantly, with the building height reduced from an initial 21 storeys to the current proposed height of 15 storeys. The proposed land uses and layout have also evolved through discussions with LBC officers, and the articulation and materiality of the proposed building façade has been revised, including the treatment of the building corner and the proposed student entrance.
- 4.6 Additionally, a programme of consultation with a number of key stakeholders has been undertaken during the development of the proposals, including the GLA, TfL and Historic England. Feedback during the meetings held was generally positive. The GLA issued support for principle of development and the principle of a tall building in this location, subject to satisfying the relevant policy requirements. Similarly, Historic England raised no significant concerns with regards to impacts on the setting of the nearby listed buildings, or on LVMF

View 2A.2 (Palace of Westminster), confirming support for the architectural approach which officers considered to be sympathetic to the architectural character of the area.

LBC Design Review Panel

- 4.7 The Proposed Development was presented to the LBC Design Review Panel on 25th September 2020. A response to the feedback received from the Panel, particularly in relation to the massing and façade, is set out in the Design and Access Statement however, in summary, the design team has fully considered the feedback and has sought to incorporate the advice into the proposals, where appropriate and practicable.
- 4.8 In response to the LBC Design Review Panel comments, the proposed public realm offer has been developed further through the inclusion of street trees, planters and improved surface treatment, and the Application is supported by a robust Energy and Sustainability Statement which sets out the series of sustainability measures which have been incorporated into the Proposed Development to minimise carbon emissions and create a building which delivers exemplary sustainability standards.

Public Consultation

- 4.9 Extensive consultation has been undertaken to initiate a dialogue between the Applicant and the local community in order to understand their objectives, aspirations and expectations, which have helped inform the evolution of the Proposed Development.
- 4.10 In light of the ongoing COVID-19 pandemic, the form of public consultation was modified due to the various restrictions and regulations in place. As a result, the majority of consultation undertaken was primarily held online. A flyer advertising a virtual exhibition of the proposals was delivered to 2,423 local addresses on the 12th October 2020, which included a telephone number and provision to have hard copies of the exhibition materials made available for those unable to access the internet. Upon request, a development information pack and feedback form can be requested by local residents and sent back to the Applicant via freepost.
- 4.11 An introductory letter was also sent to the 50 residential addresses occupying no. 17-33 on the 24th September 2020. A video conference meeting was held with the residents of no. 17-33 on 1st October 2020. In addition, video conference briefings were offered to the Drummond Street Neighbourhood Forum and Regent's Park Estate Tenants & Residents' Association. Subsequently, a video conference meeting was held with the Drummond Street Neighbourhood Forum on 22nd October 2020.
- 4.12 Additionally, briefings and updates were offered to Regent's Park Ward members, namely Cllr Nasim Ali, Cllr Nadia Shah, Cllr Heather Johnson.
- 4.13 Throughout the consultation process, a dedicated telephone number, e-mail and website were promoted to ensure that stakeholders and neighbours could explore the proposals and provide feedback on the project. From the period of 24th September 2020 to 29th October

2020, 108 unique users have visited the website in over 135 sessions, with an average session duration of six minutes and 10 seconds. 7 online feedback forms have been received and 12 feedback newsletters completed.

Key Themes from the Consultation Process

- 4.14 Overall, the response to the Proposed Development has been positive, particularly with regards to the proposed architectural approach, affordable workspace provision and provision of affordable student accommodation.
- 4.15 Following the submission of the Application, the Applicant remains committed to consulting and engaging with local residents, businesses and other stakeholders. The intention is to maintain the dialogue with those individuals and organisations who have expressed an interest in the scheme and to keep people up to date with the project.

5.0 PLANNING POLICY CONTEXT

- 5.1 This section identifies the planning policy framework which is relevant to the Site. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level, there is both planning policy and guidance which combine to provide the framework for the consideration of the Proposed Development.

National Planning Policy

- 5.2 National planning policy is set out in the form of the revised National Planning Policy Framework (NPPF), which was adopted on 19 February 2019. At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.
- 5.3 For decision taking, the presumption in favour of sustainable development means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

The Development Plan

- 5.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan for LBC is:
- The London Plan – Consolidated with Alterations Since 2011 (March 2016);
 - Camden Local Plan (July 2017);
 - Camden Site Allocations (September 2013);
 - Euston Area Plan (January 2015); and
 - Fitzrovia Area Action Plan (March 2014).

Emerging Planning Policy

- 5.5 The Mayor is in the process of preparing a new London Plan. The Examination in Public on the draft London Plan was held between 15th January and 22nd May 2019, and the Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019. On 9th December 2019, the Mayor issued to the Secretary of State his intention to publish the draft London Plan. Therefore, as set out in Paragraph 48 of the NPPF, the draft policies within the draft London Plan will hold significant weight in the determination of the planning application, and the proposals have been assessed against the draft policies, where relevant.

- 5.6 LBC is currently progressing the first draft of a partial update to the Euston Area Plan to reflect changing circumstances at Euston and to ensure that the policies and evidence base reflect the latest information, constraints and opportunities for the area. Adoption of the updated Euston Area Plan is anticipated Spring 2022.

Supplementary Planning Documents (SPDs)

- 5.7 Both the GLA and LBC have produced a number of supplementary guidance documents, which amplify planning policy and are relevant to the Proposed Development. These documents are material considerations but do not form part of the Development Plan. Particular regard has been given to the Camden Planning Guidance: Student Housing SPD, published March 2019, and the Camden Planning Guidance: Employment Sites and Business Premises SPD, published March 2018.

Historic England

- 5.8 Historic England has also prepared a number of guidance notes which have informed the Proposed Development, which have been summarised below.
- 5.9 Advice Note 3, published March 2015, sets out guidance with regards to the setting of heritage assets, and managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated.
- 5.10 Advice Note 4, published December 2015, provides advice on tall buildings, as an update to previous advice published by CABE and English Heritage. The note establishes a number of criteria which tall buildings should adhere to in order to achieve architectural quality and address the historic environment.

Site Designations

- 5.11 The Site is subject to the following designations, as identified in the adopted LBC Local Plan Proposals Map:
- Central London Area (Central Activities Zone);
 - Euston Opportunity Area (Euston Area Plan);
 - Viewing Corridor of LVMF View 2A.2 (Palace of Westminster); and
 - Wider Setting Consultation Area of LVMF View 5A.2 (St. Paul's Cathedral).

6.0 PLANNING POLICY ASSESSMENT

6.1 This section reviews all adopted and emerging policies which are relevant to the Proposed Development and provides an assessment of how the Proposed Development complies with planning policy in respect of the following:

- Principle of Development;
- Land Uses;
- Affordable Workspace;
- Principle of a Tall Building;
- Heritage and Townscape;
- Public Realm;
- Transport;
- Energy and Sustainability;
- Environmental Considerations.

Principle of Development

6.2 At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). The NPPF sets out the Government's commitment to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity. Paragraph 118 of the NPPF states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements and promote and support the development of under-utilised land and buildings.

6.3 London Plan Policy 2.10 states that the Mayor will, and boroughs and other relevant strategic partners should enhance and promote the unique international, national and London-wide roles of the Central Activities Zone (CAZ), supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses. Draft London Plan Policy GG2 seeks to create successful, sustainable mixed-use places that make the best use of land, by enabling the development of brownfield land, particularly in Opportunity Areas, whilst prioritising sites which are well-connected by existing or planned public transport. Draft London Plan Policy SD1 seeks to ensure that Opportunity Areas fully realise their growth and regeneration potential, with draft London Plan Table 2.1 identifying the Euston Opportunity Area to deliver up to 3,800 new homes and 15,000 new jobs.

6.4 Camden Local Plan Policy G1 states that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough, which will be achieved by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes best use of its site.

- 6.5 Euston has long been identified as a significant opportunity for development by both regional and local strategic plans. The Camden Local Plan and Euston Area Plan acknowledge that the Opportunity Area is suitable for large-scale redevelopment and/or significant increases in jobs and homes.
- 6.6 Despite its highly accessible location within the Central London Area and Euston Opportunity Area, the Site is underutilised, providing low-quality, outdated employment floorspace which has been vacant for some time in a building which is of very poor design quality. The Proposed Development will optimise the development potential of the Site through the delivery of a significant quantum of student accommodation and employment floorspace towards the Borough's student housing stock and employment targets, whilst supporting the area's strengths in the Life Sciences and Tech industries through the provision of workspace suitable for such uses, in line with Paragraph 2.1.70 of the draft London Plan. It is therefore considered that the principle of development is acceptable in this instance, and redevelopment of the Site should be strongly encouraged.

Land Uses

Reduction in Office Floorspace

- 6.7 Paragraph 80 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 6.8 London Plan Policy 4.2 seeks to support the managed conversion of surplus office capacity to more viable, complementary uses. Similarly, draft London Plan Policy E1 states that the scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored, and that the redevelopment, intensification and change of use of surplus office space to other uses is supported. The supporting text of Policy E1 (Paragraph 6.1.7) notes that surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document).
- 6.9 Camden Local Plan Policy E2 encourages the provision of employment premises and sites in the borough. The policy seeks to resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction that the site or building is no longer suitable for its existing business use, and that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.
- 6.10 Paragraph 5.37 of the Camden Local Plan states that, when assessing proposals that involve the loss of a business use to a non-business use, LBC will consider whether there is potential

for that use to continue. The Council will take into account various factors, including the suitability of the location for any business use; whether the premises are in a reasonable condition to allow the use to continue; the range of unit sizes it provides, particularly suitability for small businesses; and whether the business use is well related to nearby land uses.

- 6.11 In addition to the factors set out above, Paragraph 8 of the Camden Planning Guidance: Employment Sites and Business Premises SPD notes that when assessing proposals that involve the loss of a business use the Council will also take in account whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space.
- 6.12 The Site provides a total of 3,693 sqm of office floorspace (Class E). However, 1,427 sqm of the existing office floorspace comprises either ancillary storage space at basement level of no. 35-37, or ancillary storage space at ground floor level of no. 17-33 which was most recently used as a workshop. Both of these spaces could not be realistically occupied for office use. Therefore, of the total existing office floorspace, it is considered that 2,266 sqm qualifies as office accommodation which could be occupied as such without the requirement for significant internal alterations.
- 6.13 Overall, the existing office accommodation, which has been vacant since 2018, is considered to be of very poor quality. As set out in the supporting Marketing and Demand Report prepared by Grant Mills Wood, and the Marketing Letter prepared by James Andrew International (Appendix 3 to the Marketing and Demand Report), the existing building has been unsuccessfully marketed for office use since the Applicant acquired the Site in June 2019. In total, 23 inspections have been carried out to date, resulting in one proposal which was deemed to be unacceptable. In the majority of instances, the office accommodation was discounted on the basis of quality and location, particularly when considering the abundance of available office space of differing quality and sizes within central London and in the immediate vicinity of the Site. As such, it is considered to be no longer suitable for modern business needs and is therefore surplus to requirements.
- 6.14 Whilst the Proposed Development will result in a reduction in employment floorspace, the proposals will still provide a total of 1,255 sqm of employment floorspace, delivered as affordable workspace, which will be of a much higher quality than the existing office accommodation and is considered to have the potential to offer greater benefits to the local area due to its flexibility and suitability for a range of small businesses, in accordance with Paragraph 8 of the Camden Planning Guidance: Employment Sites and Business Premises SPD.
- 6.15 At present, owing to its extended period of vacancy, the Site provides no jobs and is of no benefit to the surrounding area or the local economy. The Proposed Development has the potential to deliver an additional 110 jobs for the local area as part of the proposed affordable workspace offer and employment associated with the proposed student accommodation.

- 6.16 It is therefore considered that the supporting marketing information clearly demonstrates that the existing building is no longer suitable for its existing employment use, and that the possibility of retaining, reusing or redeveloping the Site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.
- 6.17 As such, the proposed reduction in office floorspace accords with the requirements of draft London Plan Policy E1, Camden Local Plan Policy E2 and Camden Planning Guidance, and is therefore acceptable in principle.

Provision of Student Accommodation

- 6.18 Paragraph 61 of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including students.
- 6.19 London Plan Policy 3.8 requires boroughs to ensure that strategic and local requirements for student housing meet a demonstrable need. Draft London Plan Policy H15 states that Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood, and the use of the accommodation is secured for students. The accommodation should also provide adequate functional living space and layout, and the delivery of student accommodation in locations well-connected to local services and public transport is encouraged.
- 6.20 Camden Local Plan Policy H9 states that LBC will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation. The Council will seek a supply of student housing to meet or exceed Camden's target of 160 additional places in student housing per year and will support the development of student housing provided that the development meets the following criteria (with a response to each below):
- a. *will not involve the net loss of 2 or more self-contained homes;*
The Proposed Development will not result in the loss of any self-contained homes.
 - b. *will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year;*
The provision of student accommodation will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year, as confirmed in the Camden Planning Guidance: Student Housing SPD.
 - c. *will not involve a site identified for self-contained housing through a current planning permission;*
There are not current planning permissions in place on the Site for the delivery of self-contained housing.
 - d. *complies with any relevant standards for houses in multiple occupation (HMOs);*

- The proposed student accommodation will be of the highest quality, far exceeding the relevant standards set out in the Camden Planning Guidance Student Housing.
- e. *serves higher education institutions that are accessible from it;*
The Site is situated in a highly-accessible location within short walking distance to a number of higher education institutions, including (but not limited to) the main UCL campus, University of Westminster, Birkbeck University and the Royal Academy of Dramatic Art.
 - f. *includes a range of flat layouts including flats with shared facilities wherever practical and appropriate;*
The proposed unit mix will comprises studios and twodios, which has been informed by market demand and the requirements of the student accommodation operator.
 - g. *has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole;*
The Proposed Development will be subject to a commitment from the operator (secured by legal agreement) restricting occupation of the units to full time students from a defined list of higher education institutions within the local area. The scheme will also deliver 35% of the units as affordable.
 - h. *will be accessible to public transport, workplaces, shops, services, and community facilities;*
The Site is within a highly accessible location, benefitting from a PTAL of 6b and is within walking distance to a range of local services.
 - i. *contributes to creating a mixed, inclusive and sustainable community;*
Owing to its urban location, the surrounding area is defined by a rich mix of uses, including residential. The introduction of student accommodation and affordable workspace will further enhance mix of uses and the local community.
 - j. *does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity;*
Schafer House to the south represents the only other student accommodation within the immediate surrounding area. As demonstrated in the supporting technical assessments and reports issued in support of the Application, the Proposed Development will not result in harm to neighbouring residential amenity.

- 6.21 As demonstrated above, the proposed student accommodation accords with the requirements of Camden Local Plan Policy H9. The student accommodation would be of the highest quality, providing an exceptional standard of living for future residents whilst meeting an identified need for higher education institutions within the local area. The Proposed Development has been designed with a strong focus on student wellbeing, providing bright, thoughtfully-designed rooms which far exceed the required internal space standards, delivered alongside a series of internal and external facilities which will enhance the quality of life for all its residents. The principle of student accommodation in this location is therefore in accordance with the NPPF, draft London Plan Policy H15 and Camden Local Plan Policy H9, and as such, should be supported by LBC.

Affordable Student Accommodation

- 6.22 Part 4 of draft London Plan Policy H15 requires the maximum level of student accommodation to be secured as affordable student accommodation, as defined through the London Plan and associated guidance. To follow the Fast Track Route, at least 35% of the accommodation must be secured as affordable student accommodation. The affordable student accommodation bedrooms should be allocated by the higher education providers that operate the accommodation, or have the nomination right to it, to students it considers most in need of the accommodation.
- 6.23 Paragraph 4.15.8 of the supporting text of draft London Plan Policy H15 provides the definition of affordable student accommodation, which is *'a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year.'*
- 6.24 The Proposed Development will deliver 84 affordable student bedspaces, representing 35% of the total student accommodation provision. The proposed affordable units will be provided at a rental cost for the academic year equal to or below 55% of the maximum income that a new full-time student studying in London could receive from the Government's maintenance loan for living costs, in line with the draft London Plan requirements. The exact affordable units will be agreed with LBC during the determination of the Application. All occupants will benefit from access to the same communal spaces and facilities within the development, ensuring an inclusive and vibrant living environment.
- 6.25 The proposed affordable student accommodation meets the requirements of the Mayor's Fast Track Route, and as such, no financial viability information is required in this instance.

Affordable Workspace

- 6.26 Draft London Plan Policy E3 notes that planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.
- 6.27 At local level, Camden Local Plan Policy E1 seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The Council will support businesses of all sizes, in particular start-ups, small and medium-sized enterprises, and maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources.
- 6.28 Strategic Principle EAP 1 of the Euston Area Plan states that new economic uses should support the local economy and include local people in the opportunities created by development as well as contributing to the wider London and national economy, particularly strengthening the

role of the area's cluster of science and education institutions. The Euston Area Plan notes that the provision of smaller spaces will form an important part of the innovation ecosystem, supporting the growth of research and development and creative industry start-ups, and acknowledges that the provision for knowledge-based, innovative and creative uses could take a variety of forms, including managed affordable or incubator workspace and specialised spaces where required by specific occupiers.

- 6.29 Paragraph 38 of the Camden Planning Guidance: Employment Sites and Business Premises SPD states that, where provision of workspace for small and medium sized enterprises has been agreed as part of a development, the Council will seek to secure this through the use of planning obligations. The Council will also seek to use planning obligations to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA) or more.
- 6.30 A key public benefit of the Proposed Development is the provision of a 1,255 sqm (GIA) of affordable workspace, which represents 100% of the total employment floorspace to be provided. The units will be designed to be flexible and adaptable to meet current local demand, which may include knowledge-based, innovative and creative uses in the form of managed workspace or incubator space, in line with the vision set out in the Euston Area Plan. The proposed rent levels and terms are to be agreed with LBC during the determination of the Application.
- 6.31 The proposed affordable workspace offer far exceeds the requirements of draft London Plan Policy E3, Camden Local Plan Policy E1, Strategic Principle EAP 1 of the Euston Area Plan and the guidance set out within the Employment Sites and Business Premises SPD. As such, the proposals should be strongly supported.

Principle of a Tall Building

- 6.32 The proposed scheme includes delivery of a 15-storey building extending to 73 metres AOD. London Plan Policy 7.7 states that tall building should generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport, whilst draft London Plan Policy D9 requires boroughs to determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. At local level, Camden Local Plan Policy D1 states 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 within Policy D1, and the Council will also give particular attention to the following criteria (with a response to each provided):
- *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;* As demonstrated in the supporting Design and Access Statement, the proposed building will largely reflect the footprint of the existing building, whilst the proposed architectural approach and materiality directly responds to the character of the

surrounding streetscape. The top of the building is not considered to have any adverse impact on the skyline, as demonstrated in the local views included within the THVIA, prepared by Tavernor Consultancy, submitted in support of the Application.

- *the historic context of the building's surroundings;*

The proposed detailed design has been informed by extensive historical character studies of the Euston area, as reflected in the proposed façade design and materiality which is inspired by the architectural character of the warehouses and the neighbouring listed buildings, ensuring the scheme is in keeping with the surrounding context and does not harm the setting of the neighbouring heritage assets.

- *the relationship between the building and hills and views;*

The impact of the Proposed Development on key local and strategic views has been robustly assessed in the supporting TVBHA, which demonstrates that, whilst the Proposed Development would have visual effects on some strategic and local views around the Site and localised effects on the character and quality of the local townscape, none of these would be adverse.

- *the degree to which the building overshadows public spaces, especially open spaces and watercourses;*

It is not considered that the Proposed Development would have any greater impact on overshadowing of the surrounding public realm than the existing building. There are no open spaces or watercourses situated within close proximity to the Site which would be impacted by the proposals.

- *the contribution a building makes to pedestrian permeability;*

Whilst the Proposed Development does not provide an opportunity to improve pedestrian permeability, the proposals will be delivered alongside public realm improvements which will improve the pedestrian experience.

- *improved public accessibility;*

At present, the building is vacant and does not contribute to the local area. The proposals will provide enhanced active frontages along William Road and Stanhope Street for use as affordable workspace.

6.33 In addition to these design considerations, Policy D1 states that tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability. These considerations have been addressed separately within this section.

6.34 Furthermore, it is important to reiterate that the surrounding area already includes a number of tall buildings, including the residential towers on the Regents Park Estate to the north and west, and various tall and large-scale buildings within Regents Place to the south. In terms of the emerging context, the proposed redevelopment of Euston Station and the surrounding area is likely to see the emergence of tall buildings in the near future. The Proposed Development would be clearly subservient to the existing tall buildings in the surrounding area and would mediate between the existing and emerging tall building context to the south and around Euston Station, and the more varied residential scale to the north of the Site.

- 6.35 Having regard to the above, and owing to the Site's prominent, highly accessible location within the Central London Area and the Euston Opportunity Area, it is considered that the Proposed Development accords with the requirements of draft London Plan Policy D9 and Camden Local Plan Policy D1, and the provision of a tall building in this location should therefore be supported in principle.

Heritage and Townscape

- 6.36 The NPPF establishes national level policy on the conservation and preservation of the historic environment. Paragraph 189 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 192 further states that local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.37 Paragraph 193 provides that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and that clear and convincing justification will be required for loss and harm to heritage assets. Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 196 of the NPPF requires that harm to be weighed against the public benefits of the proposals. It is important to note that no harm to neighbouring heritage assets as a result of the Proposed Development has been identified.
- 6.38 Under Paragraph 200 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset, LPAs should look for opportunities for new development in the setting of heritage assets to enhance or better reveal their significance and proposals that preserve or better reveal the significance of heritage assets should be treated favourably.
- 6.39 The London Plan promotes development of the highest architectural quality. Adopted London Plan Policy 7.6 sets out the Mayor's design guidance and requires developments to optimise the potential of sites and be designed in consideration of the local context including potential impact on listed buildings and conservation areas. Draft London Plan Policy D9 states that tall building proposals should take account of and avoid harm to the significance of London's heritage, and buildings should positively contribute to the character of the area. Additionally, Part C of draft London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.40 At local level, Camden Local Plan Policy D1 seeks to secure high quality design in development, requiring development to respect local context and character, and preserve or enhance the historic environment and heritage assets. Development should also comprise details and materials that are of high quality and complement the local character.

- 6.41 Camden Local Plan Policy D2 specifically addresses heritage impacts, and states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. To preserve or enhance the Borough's listed buildings, the Council will resist development that would cause harm to significance of a listed building through an effect on its setting.
- 6.42 A robust assessment of the impact of the Proposed Development on the relevant designated heritage assets, including nos. 48-52 Stanhope Street (Grade II listed), has been provided in the supporting Townscape, Visual and Built Heritage Assessment (TVBHA), prepared by Tavernor Consultancy. The assessment considers that the Proposed Development would not give rise to any unacceptable impacts to heritage, townscape or visual receptors. This is reiterated in the formal pre-application response issued by Historic England.
- 6.43 The TVBHA notes that, whilst the Proposed Development would change the settings of the heritage assets assessed, there would be no material effects on the appreciation of the heritage significance of any conservation areas, registered landscapes or listed structures. In NPPF terms, the heritage significance and ability to appreciate the heritage significance of the designated heritage assets would be sustained and not harmed by Proposed Development.
- 6.44 With regards to LVMF View 2A.2 (Parliament Hill Summit to the Palace of Westminster), which has been highlighted as a key townscape consideration by both the GLA and LBC, the TVBHA concludes that the Proposed Development would not have significant or adverse effects, ensuring the appreciation of the heritage significance of the Grade I listed Palace of Westminster and the Outstanding Universal Value of the Westminster World Heritage Site is sustained. With regards to key local views identified by LBC during pre-application stage, the Proposed Development would have visual effects on some views around the Site and localised effects on the character and quality of the local townscape, but none of these would be adverse.
- 6.45 The TVBHA concludes that, through embedded mitigation during the iterative design development and visual impact testing process prior to submission, development on the Site has been optimised without adverse visual townscape or built heritage effects, both in terms of its scale and its detailed articulation and architectural treatment, which is judged to be of the highest quality.
- 6.46 For these reasons, the Proposed Development is considered to be in accordance with national, regional and local policies and guidance in respect of design, heritage and conservation.

Public Realm

- 6.47 London Plan Policy 7.5 addresses public realm, setting out the need for public spaces to be secure, accessible, inclusive, connected, easy to understand and maintain, related to local

context, and to incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Draft London Plan Policy D8 requires development proposals to encourage and explore opportunities to create new public realm where appropriate. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.

- 6.48 Camden Local Plan Policy T1 states that, in order to promote walking in the borough and improve the pedestrian environment, the Council will seek to ensure that development improves the pedestrian environment by supporting high quality public realm improvement works and makes improvements to the pedestrian environment. Additionally, it should be noted that the Regents Park Estate Illustrative Masterplan, as shown in Figure 4.8 of the Euston Area Plan, seeks to deliver enhanced walking and cycling links along William Road.
- 6.49 Providing a high-quality public realm and an improved pedestrian experience is a key objective and one of the principal public benefits of the Proposed Development. It is proposed to enhance the existing public realm along William Road and Stanhope Street through the removal of the vehicle crossover on William Road and reinstatement of the footway to create a continuous pedestrian route without obstruction. The use of recessed entrances to the proposed student accommodation and affordable workspace will provide additional space to maximise pedestrian comfort, whilst the addition of active ground floor frontages along William Road and Stanhope Street will activate the public realm, providing natural surveillance whilst enhancing the pedestrian experience.
- 6.50 The public realm will also benefit from the addition of planters and street trees, adding a much-needed green character to William Road and Stanhope Street, enhancing the surrounding area and facilitating the regeneration of William Road. In terms of materiality, the choice of surface treatment will be both contextual and durable, and the proposed planters will reflect the materials used on the façade of the Proposed Development. Further details of the proposed public realm proposals are set out in the supporting Design and Access Statement, prepared by Morris + Company.
- 6.51 It is considered that the delivery of these public realm improvements is strongly supported in planning policy terms and should therefore be encouraged by LBC.

Transport

- 6.52 This Section should be read in conjunction with the Transport Assessment, prepared by Caneparo Associates, which is submitted in support of the Application and provides a comprehensive review of the Proposed Development from a transport perspective, and a robust assessment of the associated highways impacts.

- 6.53 At national level, the NPPF states that development should take opportunities to promote walking, cycling and public transport use (Paragraph 102). Both adopted and emerging London Plan policies promote development that will not adversely affect safety on the transport network. Notably, draft London Plan Policy T1 states that development proposals should support the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041, and requires development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Similarly, Camden Local Plan Policy T1 promotes sustainable transport by prioritising walking, cycling and public transport in the borough.
- 6.54 In response to the above, one of the key objectives of the Proposed Development is to promote the use of sustainable transport methods and encourage car-free travel by providing a car-free and permit-free development, and promoting sustainable travel through improved footways and extensive cycle parking provision. It is therefore considered that the Proposed Development meets the key transport objectives at national, regional and local level. Each aspect of the proposed transport strategy is further assessed below.

Public Transport

- 6.55 Owing to its proximity to a number of London Underground stations and bus services within a short walking distance, the Site is highly accessible by public transport with a Public Transport Accessibility Level (PTAL) of 6b, which represents the highest level of accessibility. The Site also has good access to existing cycling infrastructure, with both Hampstead Road and Euston Road to the east served by designated TfL Cycleways.
- 6.56 The supporting Transport Assessment concludes that the impact of the Proposed Development will not have a material impact on transport network as a result of the proposals, and as such, the Proposed Development is considered to be acceptable in this regard.

Car and Cycle Parking

- 6.57 Draft London Plan Policy T5 seeks that proposals help remove barriers to cycling and create a healthy environment in which people choose to cycle by securing the provision of appropriate levels of cycle parking, as per Table 10.2 of the draft London Plan. Draft London Plan Policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.
- 6.58 Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.
- 6.59 The scheme will provide exemplary cycle facilities for residents, employees and visitors, with a total of 200 long-stay and 11 short-stay cycle parking spaces, in accordance with emerging London Plan standards. With regards to car parking, the Proposed Development will be both

car-free and permit-free. This approach is supported by TfL, as well as draft London Plan Policy T5 and adopted Camden Local Plan Policy T2. As such, it is considered that the proposed parking provision is acceptable.

Servicing Arrangements

- 6.60 This Section should be read in conjunction with the Draft Delivery and Servicing Management Plan, prepared by Caneparo Associates, which is submitted in support of the Application.
- 6.61 Given the low number of delivery and servicing trips which will be generated by the Proposed Development (6 to 7 deliveries per day), all servicing activity will be undertaken via William Road and Stanhope Street, as per the existing arrangement, which will be managed through compliance with a detailed Delivery and Servicing Management Plan, secured by legal agreement or planning condition. Additional footway for servicing activity will be created immediately to the north of the Site along William Road through the removal of the existing on-site parking area and associated vehicle crossover.
- 6.62 Additionally, with regards to the student accommodation, the procedure for managing student arrival and departure periods at the start and end of term is set out within the Student Management Plan, prepared by Homes for Students, submitted in support of the Application. Through compliance with the mitigation measures set out within the Student Management Plan, the potential effect of the Proposed Development at the start and end of term would be negligible.
- 6.63 Overall, as set out in the support Transport Assessment, it is considered that the proposed servicing arrangements would have a negligible effect on the local transport network. As such, it is considered that the Proposed Development is acceptable in this regard.

Highways Impacts

- 6.64 As part of the Transport Assessment, an assessment of the effects of the Proposed Development has been carried out, which concludes that there would not be any unacceptable impact on the highways and transportation network arising from the development proposal. As such, it is considered that the Proposed Development is in accordance with Section 9 of the NPPF, adopted and emerging London Plan policy and LBC planning policy and is therefore acceptable in transport terms.

Energy and Sustainability

- 6.65 Paragraph 148 of the NPPF encourages proposals which support renewable and low carbon energy and associated infrastructure. Paragraph 153 states that, in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable; and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

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- 6.66 As adopted, London Plan Policy 5.2 requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- 1) Be lean: use less energy
 - 2) Be clean: supply energy efficiently
 - 3) Be green: use renewable energy
- 6.67 Draft London Plan Policy SI2 requires major development to be net zero-carbon, reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand through compliance with the following revised energy hierarchy:
- 1) be lean: use less energy and manage demand during operation.
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
 - 4) be seen: monitor, verify and report on energy performance.
- 6.68 This is reflected in Camden Local Plan Policy CC1 which requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. This will be achieved through the promotion of zero carbon development and the requirement for all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy, as set out above.
- 6.69 In addition, Camden Local Plan Policy CC2 expects non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encourages zero carbon in new development from 2019.
- 6.70 As set out in the supporting Energy Statement, prepared by Vitec, the Proposed Development aims to achieve high standards of sustainability by incorporating a range of sustainable design measures to reduce onsite carbon emissions. The adopted London Plan’s three-step Energy Hierarchy has been implemented and the estimated regulated CO2 savings are 66% across the Site, against a Part L 2013 compliant scheme, using SAP10 carbon factors, which significantly exceeds the current policy requirement of 35%.
- 6.71 In addition, as set out in the supporting BREEAM Pre Assessment prepared by Vitec, the proposed affordable workspace element is expected to achieve BREEAM ‘excellent’, in accordance with Camden Local Plan Policy CC2.
- 6.72 In summary, it is considered that the Proposed Development meets the relevant energy targets set out within the NPPF, the London Plan and at local level.

Environmental Considerations

- 6.73 Paragraph 127 of the NPPF stipulates that planning policies and decisions should seek to create places with a high standard of amenity for existing and future users. National guidelines for daylight and sunlight issues are contained within the BRE guidelines. Regional and local policies refer to these guidelines as the accepted standard.
- 6.74 Paragraph 170 of the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability, whilst Paragraph 180 of the NPPF states that planning decisions should aim to mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development. Paragraph 181 further states that development proposals should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA).
- 6.75 At regional level, London Plan Policy 7.6 seeks to ensure that buildings and structures do not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential developments, in relation to privacy, overshadowing, wind and microclimate. Draft London Plan Policy D9 states that wind, daylight, sunlight penetration and temperature conditions around buildings must be carefully considered and not compromise comfort and the enjoyment of open spaces around the building. Buildings should also not cause adverse reflected glare and should be designed to minimise light pollution from internal and external lighting.
- 6.76 At local level, Camden Local Plan Policy A1 seeks to protect the quality of life of occupiers and neighbours by ensuring that the amenity of communities, occupiers and neighbours is protected. In addition, Camden Local Plan Policy A4 states that the Council will seek to ensure that noise and vibration is controlled and managed.
- 6.77 In response to the above national, regional and local level policy, the Application is supported by a number of technical reports which assess the impacts of the Proposed Development on the surrounding area and neighbouring sensitive receptors. The conclusions of the relevant reports which address these policy requirements are summarised below for completeness.

Noise and Vibration

- 6.78 The Application is supported by an Environmental Noise Survey Report and a Plant Noise Assessment Report, both prepared by Hann Tucker Associates. An environmental noise survey has been undertaken in order to establish the currently prevailing noise levels, and plant noise emission criteria have been recommended based on the results of the noise survey and with reference to the LBC requirements. An assessment has also been carried out to determine the plant noise emissions at the nearest noise sensitive window, which indicates that the proposed plant should be capable of achieving the proposed environmental noise criteria at the nearest noise sensitive residential windows.

- 6.79 It is therefore considered that the Proposed Development is acceptable in terms of noise impacts relating to the proposed plant equipment.

Daylight and Sunlight

- 6.80 An assessment of the likely effects of the Proposed Development in respect of daylight and sunlight has been undertaken by Point 2, which has informed the Daylight and Sunlight Report submitted in support of the Application.
- 6.81 The Proposed Development has been informed from an early stage by daylight and sunlight analysis, resulting in a scheme which seeks to optimise development potential whilst safeguarding daylight and sunlight to the surrounding residential context. As set out in the supporting Daylight and Sunlight Report, only Winchester Apartments to the immediate north experiences any 'noticeable' changes in daylight as a result of the Proposed Development however, notwithstanding there are some noticeable changes, that should not be equated to 'unacceptable' and importantly the retained levels of daylight are commensurate, and largely better than, a typical city centre location.
- 6.82 Overall, owing to the Site's location within a densely-populated urban area, it is considered that the impacts are acceptable, particularly when considered in the context of the Proposed Development, which will deliver a range of public benefits. As such, the Proposed Development accords with the NPPF, regional and local planning policy, and the impacts are acceptable in terms of daylight and sunlight.

Wind

- 6.83 An assessment of the wind microclimate of the Proposed Development has been carried out by Thornton Tomasetti as part of the supporting Bioclimatic Report, which considers the impact of wind the levels of pedestrian wind comfort at street level and on the roof terraces around the Proposed Development. Wind conditions around the Site for the existing environment and Proposed Development were simulated via a digital CFD approach and evaluated according to the Lawson LDDC Comfort and Safety Criteria.
- 6.84 As set out in the Bioclimatic Report, the Proposed Development and all areas within the Site and its direct vicinity are considered to be acceptable for their intended use, both from a pedestrian wind comfort and a safety perspective. Therefore, no further mitigation measures are recommended. The Proposed Development is therefore acceptable in terms of wind impacts.

Air Quality

- 6.85 Camden Local Plan Policy states that the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing

development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.

- 6.86 The supporting Air Quality Assessment, prepared by Air Quality Consultants, provides an assessment of the impacts of the Proposed Development during both construction phase and operational phase. During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions to ensure that the overall effect will be 'not significant'. The assessment also demonstrates that future residents of the Proposed Development will experience acceptable air quality, with pollutant concentrations below the air quality objectives. As the proposals do not include centralised energy plant or any car parking, the impacts of the operational phase of the Proposed Development on any existing sensitive receptors will be negligible. Overall, the assessment concludes the construction and operational air quality effects of the Proposed Development are judged to be not significant, and it is therefore considered that the Proposed Development is acceptable in terms of air quality impacts.

Contamination

- 6.87 Paragraph 178 of the NPPF requires planning policies and decisions to ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.
- 6.88 The Application is supported by a Phase 1 Geoenvironmental and Geotechnical Desk Study, prepared by Card Geotechnics Ltd. The study notes that there is potential for made ground at the Site which may contain contaminants associated with the previous site uses. However, no potential sources of significant contamination have been identified. It is therefore considered that potential pollutant linkages, if present, could be addressed using standard remedial measures. The study concludes that any residual risks may be mitigated with a contamination watching brief and discovery strategy during construction, details of which are set out within the report. The Proposed Development is therefore considered to be acceptable in terms of contamination and ground conditions.

Flood Risk and Drainage

- 6.89 London Plan Policy 5.12 states that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF. Draft London Plan Policy SI 12 states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 6.90 The Site is located within Flood Zone 1 which is considered an appropriate location for the uses proposed. The Application is supported by a Flood Risk Assessment, Drainage Strategy and SuDS Assessment, prepared by Iesis Structures, which confirms that the Site's flood risk profile is low from all known flood sources, and that the Proposed Development will not increase the flood risk, either onsite or to neighbouring properties. The Proposed Development is therefore considered to be acceptable in this regard.

7.0 DRAFT SECTION 106 HEADS OF TERMS

7.1 This section sets out a summary of the draft Heads of Terms for the Proposed Development and identifies where financial contributions could be made and where works 'in-kind' are proposed in lieu of payment. The draft Heads of Terms have been considered in relation to the Camden Planning Guidance: Developer Contributions SPD, adopted March 2019.

7.2 It is envisaged that discussions relating to the following draft Heads of Terms and the Section 106 Agreement will continue with LBC during the determination of the Application. A number of these items may be appropriately dealt with by planning condition and this will be discussed and agreed with officers during the course of the application.

- **Car-free development (in-kind provision)** – Commitment to a car-free development for all land uses.
- **Affordable workspace (in-kind provision)** - The provision of 1,255 sqm (GIA) of affordable workspace, comprising 100% of the total employment floorspace provision.
- **Affordable student accommodation (in-kind provision)** – The delivery of 84 affordable student bedspaces, comprising 35% of the overall student accommodation provision.
- **Student accommodation (in-kind provision)** – Commitment to restrict occupation of student accommodation to students from a defined list of higher education institutions within the surrounding area.
- **Public realm improvements (in-kind provision)** – Provision of public realm improvements along William Road and Stanhope Street.
- **Detailed Delivery and Servicing Management Plan (in-kind provision)** – Compliance with a detailed Delivery and Servicing Management Plan for proposed uses.
- **Employment and Training Contribution (financial contribution)** – Contribution towards employment and training initiatives for local Camden residents during construction and after completion.
- **Processing and Monitoring Charge (financial contribution)** – Processing and monitoring charge per head of term included within the signed Section 106 agreement.

8.0 CONCLUSIONS

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 8.2 This Statement assesses the proposed redevelopment of 17-37 William Road against the relevant national, regional and local planning policy. The principle of Proposed Development accords with adopted and emerging planning policy and guidance, which all seek to ensure that development makes the most effective and efficient use of land.
- 8.3 The Proposed Development will transform an underutilised brownfield site situated within a highly-accessible location the Borough, delivering a substantial quantum of student accommodation and affordable workspace in a landmark building designed by Morris + Company, alongside a high-quality public realm offer which will significantly improve the Site and its surroundings.
- 8.4 The proposals have been subject to a comprehensive consultation exercise involving officers from LBC and key consultees such as the GLA, Historic England, TfL, local residents and amenity groups. The issues raised by these stakeholders have been considered and incorporated into the development of the final proposals, where practicable. Consultation will continue throughout the determination period.
- 8.5 The Proposed Development has been subject to detailed assessment against national, regional and local planning policy and guidance and has been found to be in general accordance with the Development Plan and other material considerations. In particular, it will deliver the following policy objectives and public benefits:
- Replacement of vacant 1960s office building of no architectural merit with a new building of exemplary architectural quality, providing 239 much-needed student bedspaces, including 84 affordable bedspaces, serving students attending higher education institutions in the local area and meeting an identified need in the Borough.
 - Provision of 1,255 sqm (GIA) of flexible, affordable workspace, designed to meet the needs of a range of small local businesses and start-ups including knowledge-based, innovative and creative uses, delivered alongside improvements to the existing ground floor frontage along William Road.
 - Delivery of approximately 14 jobs during the construction period and 110 jobs across the Site during operation.
 - Provision of public realm improvements along William Road and Stanhope Street, providing an enhanced pedestrian experience through the addition of street trees, planters and improved footways.
 - Indirect positive benefits, including increased local spend of users and occupiers of the Site, and enhanced vibrancy for the local area.

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- Significant Mayoral and LBC Community Infrastructure Levy contributions and appropriate Section 106 contributions, providing considerable economic benefits which would assist in the provision of infrastructure and improvement of the local area.
- 8.6 The impacts of the Proposed Development have been fully assessed by supporting application documents, and mitigation measures have been identified and incorporated where necessary and practicable. The Proposed Development is considered to be entirely appropriate for the Site and the surrounding area.
- 8.7 Overall, the Proposed Development will deliver an exemplary scheme which would have many regenerative and economic benefits. For the reasons outlined above, the principle of the development is consistent with the broad objectives of planning policy and in accordance with the Government's overarching objectives for sustainable growth. The Proposed Development should therefore be granted planning permission.

APPENDIX 1 - PLANNING HISTORY

Reference	Address	Date	Description	Status
TP79387/23003	17-37 William Road and 62-70 Stanhope Street	14/11/1957	The erection of a partly seven-storey (including basement) and a partly single-storey building on the sites of Nos. 17-37 William Road and 62-70 Stanhope Street, St. Pancras, for use as garage, fibrous plaster workshop and workrooms.	Granted
7669	62-70 Stanhope St & 17-37 William Rd	03/07/1959	Erection of a partly seven- storey building (including basement) and a partly single-storey building on the above sites, for use as garage fibrous plaster work- shops and workrooms, I am directed to inform you that the Council has decided to approve the details of the proposed roof structures and details of facing material as shown on such plans . No. 7669 (Your Nos. 634/29A,31, 32, 33, 34).	Granted
TP79837/8929	62-70 Stanhope St & 17-37 William Rd	22/07/1959	Erection of a seven and single storey building for use as garage, workshops and workrooms on the sites of 62-70 Stanhope Street and 17-37 William Road, as shown on drawings registered No.8929 your Nos. 634/29A and 634/30.	Granted
AR/TP/79837/NW	62-70 Stanhope St & 17-37 William Rd	19/01/1960	Use of the facing materials as set out in your letter in connection with the erection of a garage and fibrous plaster workrooms in accordance with the planning permission of the Council dated 24 July 1958	Granted
L12/11/B/11343	35-37 William Road London NW1	16/06/1971	The use of the first, second and third floors at 35-37 William Road, London N.W.1. for warehousing with ancillary workrooms	Granted
9200629	35-37 William Road London NW1	06/06/1992	Change of use of basement from storage to photographic laboratory/studio as shown on one un-numbered drawing	Granted
P9601933	17 William Road NW1	26/06/1996	Insertion of new entrance door and window on William Road frontage in association with internal alterations to create service reception area, as shown on drawing number 2659/2.	Granted
PS9804631	17-35 William Road NW1	12/08/1998	Erection of six-storey building, retaining industrial use (Class B2) at ground floor and with new residential on upper floors. (plans submitted)	Withdrawn – Revision Received
PS9804631R2	17-35 William Road NW1	01/03/1999	Erection of six-storey building, retaining industrial use (Class B2) at ground floor and with new residential on upper floors. (REVISED PLANS SUBMITTED).	Withdrawn – Revision Received
PS9804631R3	17-35 William Road NW1	31/03/1999	Erection of a six-storey building, retaining employment use (Class B1 light industry) at ground floor with new residential accommodation on the upper floors. (REVISED PLANS SUBMITTED).	Withdrawn – Revision Received

PS9804631R4	17-35 William Road NW1	24/05/1999	Erection of a six-storey building, retaining employment use (Class B1 light industry) at ground floor with new residential accommodation on the upper floors. (REVISED PLANS SUBMITTED).	Withdrawn – revision received
PS9804631	17-35 William Road NW1	15/09/1999	Redevelopment of the site by the erection of a six storey building with one light industrial unit (Class B1c) on the ground floor, with off street servicing provision and 46 flats (Class C3) on the upper floors, including 12 flats for social housing.	Refused - Appeal Allowed
PS9804631	17-35 William Road NW1	01/11/1999	Erection of six-storey building, retaining industrial use (Class B2) at ground floor and with new residential on upper floors. (REVISED plans submitted)	Withdrawn – Revision Received
2003/1814/P	17-33 William Road NW1	29/08/2003	Erection of a single storey extension at ground floor level, side elevation, to an existing B1c light industrial unit	Granted
2003/2576/P	17-33 William Road (Apartment 33) NW1	28/10/2003	The creation of a new door and window to existing kitchen, and an additional enclosed terrace to the east side of the building.	Granted
2005/1630/A	17-37 William Rd	04/05/2005	Retention of five internally illuminated projecting signs	Part Granted/ Refused
2015/5712/P	17-33 William Road NW1 3ER	04/12/2015	Change of use from storage (Sui Generis) to office (Class B1a), including the installation of two air-conditioning units and replacement of the garage door by new office doors	Granted
2018/2613/P	17-33 William Road NW1 3ER	25/07/2018	A Certificate of Lawful Proposed Development confirming that the carrying out of the following works before 04/12/2018 would constitute lawful implementation of planning permission 2015/5721/P within the meaning of Section 56 of the Town and Country Planning Act 1990: The construction of the office frontage facing William Road, replacing recessed garage door, in accordance with the approved drawings (proposed)	Granted
2018/5596/P	17-33 William Road NW1	11/12/2018	Implementation of planning permission 2015/5721/P dated 04/12/2015 for the change of use from storage (Sui Generis) to office (Class B1a), including the installation of two air-conditioning units and replacement of the garage door by new office doors.	Granted
2003/3380/P	17-33 William Road NW1	22/12/2018	Submission of details of ventilation scheme pursuant to condition (v) of the appeal decision granted on 31/03/2000 (Reg. No. PS9804631) for redevelopment of the site	Granted