

STATEMENT OF CASE ON BEHALF OF APPELLANT

**APPEAL UNDER SECTION 78 OF THE TOWN & COUNTRY PLANNING ACT
1990 (AS AMENDED)**

**APPEAL BY EUSTON ONE LIMITED AGAINST THE REFUSAL OF AN
APPLICATION FOR PLANNING PERMISSION FOR DEMOLITION (OF NO. 35-
37) AND REDEVELOPMENT TO PROVIDE A 15 STOREY (PLUS BASEMENT)
BUILDING FOR USE AS STUDENT ACCOMMODATION WITH AFFORDABLE
WORKSPACE (NO. 17-33 GROUND FLOOR) AND ASSOCIATED WORKS.**

17-37 WILLIAM ROAD, LONDON, NW1 3ER

APPEAL TO BE DETERMINED BY WAY OF PUBLIC INQUIRY

OCTOBER 2021

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1.0 INTRODUCTION

- 1.1 This Statement of Case ('Statement') is submitted on behalf of Euston One Limited ('the Appellant') in support of an appeal ('the Appeal') against a decision by the London Borough of Camden ('LBC') to refuse an application for full planning permission ('the Application') for the redevelopment of 17-37 William Road, London, NW1 3ER ('the Site'). The full description of development as detailed on the decision notice has been reproduced below:

'Demolition (of No. 35-37) and redevelopment to provide a 15 storey (plus basement) building for use as student accommodation with affordable workspace (No. 17-33 Ground floor) and associated works.'

- 1.2 The Application (planning application ref. 2020/5473/P) was received and validated by LBC on the 24th November 2020. The Application was accompanied by a full set of documents which are listed in Appendix 1, which form the Core Documents underpinning this Appeal.

- 1.3 LBC refused planning permission on 1st October 2021. The decision notice stated the following reasons for refusal:

- 1. The proposed development, due to the failure to provide adequate replacement employment space on the site, would fail to support growth in economic activity in Camden and result in the loss of employment opportunities within the borough contrary to Policies E1 (Economic development) and E2 (Employment premises and sites) of the London Borough of Camden Local Plan 2017.*
- 2. The proposed development, by virtue of its height, mass, scale and footprint, would be detrimental to the streetscene, setting of the nearby listed buildings and the character and appearance of the wider area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.*
- 3. The proposed development, due to its height, massing, scale and location, would result in a material loss of light and outlook as well as having an overbearing*

impact and an increased sense of enclosure on the occupiers of Winchester Apartments and users of Netley Primary School's external amenity space, contrary to policy A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.

- 4. A number of the student accommodation units within the proposed development, by reason of their poor levels of outlook, light, internal space, accessibility, external amenity space and ventilation, would fail to provide adequate internal living conditions for future occupiers, resulting in substandard accommodation contrary to policies D1 (Design), A1 (Managing the impact of development) H6 (Housing choice and mix) and H9 (student housing) of the London Borough of Camden Local Plan 2017.*
- 5. The proposed development, in the absence of a whole life-cycle carbon assessment and circular economy statement, has failed to demonstrate that the proposed substantial demolition is justified or that the proposal would promote circular economy outcomes contrary to policy CC1 of the London Borough of Camden Local Plan 2017 and policies SI2 and SI7 of the London Plan 2021.*
- 6. The proposed development, in the absence of a legal agreement to secure a car free development, would be likely to contribute unacceptably to parking stress, environmental impacts and congestion in the surrounding area, contrary to policies T1 (Prioritising walking, cycling and public transport), T2 (Parking and car-free development), CC1 (Climate change mitigation) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*
- 7. The proposed development, in the absence of a legal agreement to secure an appropriate financial contribution towards public highway works, would be likely to harm the Borough's transport and public realm infrastructure, contrary to policies T1 (Prioritising walking, cycling and public transport), T3 (Transport Infrastructure), A1 (Managing the impact of development) and DM1 (Delivery and monitoring) of London Borough of Camden Local Plan 2017.*

8. *The proposed development, in the absence of a legal agreement to secure financial contributions towards pedestrian, cyclist and environmental improvements in the area, would fail to mitigate the impact of the development created by increased trips, contrary to policies T1 (Prioritising walking, cycling and public transport), A1(Managing the impact of development) and DM1 (Delivery and monitoring) of London Borough of Camden Local Plan 2017.*
9. *The proposed development, in the absence of a legal agreement securing an Approval in Principle Report and appropriate financial contribution towards an approval in principle would fail to mitigate the impact of the basement works on the adjacent public highway contrary to policies T3 (Transport Infrastructure) and DM1(Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*
10. *The proposed development, in the absence of a legal agreement securing a Delivery and Servicing Management Plan for the commercial element, would likely give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.*
11. *The proposed development, in the absence of a legal agreement for a Student Travel Plan, Strategic Level Travel Plan (student accommodation) and Local Level Travel Plan (affordable workspace) and financial contributions for the associated monitoring, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.*
12. *The proposed development, in the absence of a legal agreement to secure a construction management plan, construction impact bond and a financial*

contribution for construction management plan monitoring, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.

- 13. The proposed development, in the absence of a legal agreement securing a local employment and training package including an appropriate financial contribution, would be likely to lead to the exacerbation of local skill shortages and lack of training opportunities and would fail to contribute to the regeneration of the area, contrary to policies G1 (Delivery and location of growth), E1 (Economic development) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*
- 14. The proposed development, in the absence of a legal agreement securing a carbon off-set contribution; an Energy Efficiency Plan and Renewable Energy Plan including the measures set out in the Energy Strategy; details regarding the feasibility of connecting to a decentralised energy network; and a Sustainability Plan including Design Stage and Post Construction stage BREEAM assessment reports and certificates, demonstrating compliance with targets, would fail to be sustainable in its use of resources, contrary to policies CC1 (Climate change mitigation), CC2 (Adapting to climate change), CC3 (Water and flooding), CC4 (Air quality), C1 (Health and wellbeing) and DM1 (Delivery and monitoring of the London Borough of the London Borough of Camden Local Plan 2017.*
- 15. The proposed development, in the absence of a legal agreement to secure financial contributions towards public open space, would be likely to contribute to pressure and demand on the existing open space in this area contrary to policies A2 (Open Space) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*

16. *The proposed development, in the absence of a legal agreement securing a student management plan, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally contrary to policies A1 (Managing the impact of development), T3 (Transport infrastructure) and DMI (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*
17. *The proposed development, in the absence of a legal agreement restricting the term-time occupation of the student units to students in higher education at publicly-funded education institutions that are accessible from the development, would fail to meet the identified need for student housing in sustainable locations, and fail to provide a range of affordable, accessible and adaptable dwellings appropriate to meet wider housing needs, contrary to policies H9 (Student Housing) of the London Borough of Camden Local Plan 2017 and policy H15 (Purpose-built student accommodation) of the London Plan 2021.*
18. *The proposed development, in the absence of a legal agreement securing 35% or the maximum viable proportion of the student accommodation as affordable and available to students nominated by a specified education institution as needing affordable accommodation, would fail to provide a range of accommodation affordable to the student body as a whole including those with state-funded living support and recognised as in need of affordable accommodation, contrary to policy H9 (Student Housing) of the London Borough of Camden Local Plan 2017 and policy H15 (Purpose-built student accommodation) of the London Plan 2021.*

- 1.4 An appeal has been launched against this refusal. An inquiry is the most appropriate means of determining such an appeal given the nature of the refusal and the matters which need to be considered.
- 1.5 This Statement outlines the evidence which the Appellant proposes to call in support of its case at the inquiry and how this evidence addresses the reasons for refusal put. This Statement also explains why the Appellant considers an Inquiry to be the most appropriate procedure for the appeal.

1.6 The Statement takes the following form:

- **Section 1** provides an introduction to the Appeal;
- **Section 2** provides a description of the Site and surrounding area;
- **Section 3** provides an overview of the relevant planning history;
- **Section 4** describes of the Proposed Development subject to appeal;
- **Section 5** summarises the consultation process;
- **Section 6** summarises the relevant national, regional and local planning policy;
- **Section 7** sets out the Appellant's case for appeal;
- **Section 8** considers the most appropriate route of appeal procedure;
- **Section 9** sets out the conclusions of this Statement.

2.0 SITE AND SURROUNDING AREA

- 2.1 The Site and surrounding area are described in some detail in the Design and Access Statement and Planning Statement (Appendix 1, Core Documents 4 and 5), in addition to the Delegated Report (Appendix 2).

Site Description

- 2.2 The 0.21 ha Site comprises two adjoining buildings situated to the south of William Road and east of Stanhope Street, Euston, in the London Borough of Camden. The Site is bound to the south by the rear of a University College London (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.
- 2.3 No. 33-37 (referred to in the Application as ‘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 no architectural quality and significantly detracts from the surrounding area and the setting of the nearby listed buildings on Stanhope Street. The building has been vacant since 2018 and is in a state of disrepair both internally and externally, suffering from extensive inactive frontages along Stanhope Street and William Road. As a result, the building no longer meets the requirements of modern office use.
- 2.4 No. 17-33 (referred to in the Application as ‘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. The residential element is to be retained as existing and does not form part of the Proposed Development.
- 2.5 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

- 2.6 The Site is situated in a transitional location which is characterised and defined by a 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.
- 2.7 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 (circa. 124m).
- 2.8 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 advance works for HS2 including large scale clearance east of Hampstead Road and the further intensification of residential development in the Regents Park Estate to replace that lost to accommodate HS2. The Regents Place regeneration to the south along Drummond Street is largely complete, with commercial-led mixed-use buildings of significant height and scale.
- 2.9 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).

Transport and Accessibility

- 2.10 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 at street level between both plots on William Road.

- 2.11 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).
- 2.12 Euston Station is situated 0.4 miles to the east, 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.
- 2.13 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.

Site Designations

- 2.14 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).

3.0 PLANNING HISTORY

- 3.1 The Site has a detailed planning history, which has been reproduced in Appendix 3. 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.
- 3.2 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 affordable housing. The Site has since been subject to a number of planning applications relating to minor internal and external alterations to the existing buildings.
- 3.3 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.
- 3.4 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 – Core Document 4) that the storage area which was subject to the change of use has not been altered to accommodate the consented office use.

4.0 THE APPEAL PROPOSAL

4.1 This section should be read in conjunction with the proposed application drawings and Design and Access Statement (Core Documents 3 and 4), both prepared by Morris + Company, which were submitted in support of the Application and explain the Proposed Development in detail.

4.2 In summary, the Application sought planning permission to transform an underutilised brownfield site comprising poor quality vacant office space, through the provision of high-quality purpose-built student accommodation, including affordable bedspaces, and permanent flexible affordable workspace fitted out to Grade A rating, alongside public realm improvements. 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 planning policy standards; and
- Improved servicing strategy to maximise servicing options.

Land Uses

4.3 It is proposed to redevelop no. 35-37 to provide a high-quality purpose-built student accommodation (PBSA) 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 which will be rented at discounted levels at least 50% below market levels, capped in line with London Plan requirements. The proposed student accommodation will comprise a mix of studios and twodios (a dual-occupancy unit with two single bedrooms), providing high-quality purpose-built accommodation to meet the needs of a range of students reflecting the student market demand in this particular location. The accommodation will also benefit from a range of well-designed 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.

- 4.4 The design of the proposed student accommodation has been informed by market demand and the requirements of the proposed developer, owner and operator, iQ Student Accommodation ('iQ'). iQ is one of the UK's leading providers of student accommodation and owns and operates 70 high-quality purpose-built student accommodation properties in 28 towns and cities throughout the UK, comprising more than 29,000 student beds. iQ is also the second largest purpose-built student accommodation owner/operator in London, with an excellent track record of both delivering and operating high-quality marketing-leading student accommodation, comprising circa 6,400 student beds in Zones 1 & 2, including iQ Bloomsbury on the Euston Road. iQ is owned by funds managed by Blackstone, one of the leading investment firms in the world, providing the scheme and its associated benefits with sufficient investment capital and to ensure certainty of delivery. The Proposed Development will also 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.
- 4.5 A significant benefit of the Proposed Development is the provision of 1,255 sqm (GIA) of high-quality flexible Grade A affordable workspace, which will provide a greater benefit to local people and businesses than the existing, poor quality, unoccupied office space.

- 4.6 The existing office space is not attractive to the market as evidenced in the Marketing Report from James Andrews International and the Grant Mills Wood Employment Statement (Core Document 28). The existing building is not suitable for continued use or desirable in the market, and does not meet the needs of most occupiers looking for office space, due to the office space comprising deep floorplates with poor natural light and a substantial amount of basement and workshop space, which is not suitable for refurbishment or reprovision to meet market standards. 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 affordable office 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 and activation and natural surveillance to the street.
- 4.7 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.
- 4.8 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.

Table 1 – Proposed Land Uses & Floor Areas

Use	Use Class	GIA (sqm)	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 (inc. market & affordable)

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

Proposed Design Approach

- 4.9 The Proposed Development has been subject to a rigorous design process, led by Morris + Company, which has evolved following extensive pre-application consultation with LBC officers, the GLA, Historic England, statutory consultees, 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 proximity to the Site.
- 4.10 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 at pre-application stage.
- 4.11 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.

- 4.12 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.
- 4.13 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.
- 4.14 The proposed remodelling of the ground floor façade of no. 17-33 seeks to 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

- 4.15 Providing a high-quality public realm and an improved pedestrian experience around the Site is one of the key objectives 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 to 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

- 4.16 The scheme will provide exemplary cycle facilities for residents, employees and visitors, with a total of 223 secure cycle parking spaces, in accordance with 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.
- 4.17 The Proposed Development will be car-free, with no on-street or off-street car parking to be provided.
- 4.18 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. An 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. A managed process for student arrival and departure at the start and end of term to minimise any impact on the surrounding public highway network is set out in the Transport Assessment and Student Management Plan, and can be secured by a Section 106 agreement.

Energy and Sustainability

- 4.19 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 and Sustainability Statement (Core Document 9), 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, photovoltaic panels at roof level, and electric panel heaters and Mechanical Ventilation with Heat Recovery ('MVHR') for heating and 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.

5.0 PRE-APPLICATION HISTORY AND CONSULTATION

- 5.1 In line with good practice and the NPPF, the Proposed Development was subject to an extensive pre-application engagement process with LBC officers, the GLA, statutory bodies including Historic England, and other key stakeholders. This Section should be read in conjunction with the Statement of Community Involvement, prepared by Kanda, which accompanied the Application (Core Document 7).

Pre-Application Engagement

- 5.2 Formal pre-application discussions and design workshops were held with LBC on the evolving scheme since an initial meeting on 11th September 2019 and a Planning Performance Agreement (PPA) was subsequently entered into in January 2020, covering both the programme for pre-application discussions and for determination of the Application.
- 5.3 Prior to the submission of the planning application to LBC, consultation was carried out with the following interested parties:
- LBC Planning Officers
 - LBC Design & Conservation Officers
 - LBC Transport Officers
 - Greater London Authority (GLA)
 - Transport for London (TfL)
 - Historic England

LBC Engagement

- 5.4 In total, six pre-application meetings and site visits were held with LBC officers to develop the scheme design and address any issues raised. The meetings focused 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.

5.5 At each meeting, the applicant team presented an update on the proposals as they had evolved in the intervening periods and in response to any comments previously provided by officers.

5.6 In response to LBC feedback and through the evolution of the proposed design, the proposed building height and massing was 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 also evolved through discussions with LBC officers, and the articulation and materiality of the proposed building façade was revised, including the treatment of the building corner and the proposed student entrance. Despite the reduction in height to 15 storeys, LBC officers advised that the Proposed Development would not be supported.

GLA and TfL Engagement

5.7 The Application was referable to the GLA as it exceeded 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). As such, formal pre-application engagement was undertaken with the GLA and TfL, comprising a formal pre-application meeting on 5th May 2020, followed by a formal written response issued on 23rd October 2020.

5.8 The GLA issued support for principle of development and the principle of a tall building in this location, subject to assessing the relevant amenity and townscape impacts.

5.9 The TfL response, included within the GLA written response, raised no concerns from a transport or highways perspective.

5.10 A copy of the GLA pre-application response is included in Appendix 4.

Historic England Engagement

- 5.11 Pre-application engagement was also undertaken with Historic England. A pre-application meeting took place on 9th September 2020, with a formal written response issued on 16th September 2020.
- 5.12 In summary, Historic England raised no concerns with regards to impacts on the setting of the nearby listed buildings or on LVMF View 2A.2 (Palace of Westminster). The response also confirmed general support for the architectural approach, which officers considered to be high-quality and sympathetic to the architectural character of the area.
- 5.13 A copy of the Historic England written response is included in Appendix 5.

LBC Design Review Panel

- 5.14 The Proposed Development was presented to the LBC Design Review Panel on 25th September 2020. A copy of the Design Review Panel Response is included in Appendix 6. The design team 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 (Core Document 4). In summary, the design team considered the feedback and sought to incorporate the advice into the proposals, where appropriate and practicable.
- 5.15 In response to the LBC Design Review Panel comments, the proposed public realm offer was developed further through the inclusion of street trees, planters and improved surface treatment, and the Application was supported by a robust Energy and Sustainability Statement which set out the series of sustainability measures which were incorporated into the Proposed Development to minimise carbon emissions and create a building which delivers exemplary sustainability standards.

Public Consultation

- 5.16 Extensive pre-application consultation was undertaken to initiate a dialogue between the Applicant and the local community in order to understand their objectives, aspirations and expectations, which helped to inform the evolution of the Proposed Development.

- 5.17 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.
- 5.18 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.
- 5.19 Additionally, briefings and updates were offered to Regent's Park Ward members, namely Cllr Nasim Ali, Cllr Nadia Shah, Cllr Heather Johnson.
- 5.20 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 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.

Post-Submission Consultation

- 5.21 During the course of the determination of the Application, LBC Officers maintained concerns regarding the height and massing of the Proposed Development (email dated 19th February 2021 included in Appendix 7).
- 5.22 Despite the position of LBC regarding the proposed height and massing, the GLA (in both Stage 1 and Stage 2 Reports – Appendix 8 and 9) considered that the proposed building height could be supported in this location, noting the high architectural quality

and positive contribution in immediate townscape views through the replacement of the existing poor-quality building, and to the local townscape and streetscape through the development of a building of high architectural quality.

- 5.23 Additionally, the formal consultation response issued by Historic England on 17th December 2020 (Appendix 10) maintained its position set out at pre-application stage and raised no concerns with regards to impact on any surrounding heritage assets.
- 5.24 LBC also raised concerns regarding the proposed reduction in office floorspace. An email received from LBC on 5th May 2021 (Appendix 11) advised that the reduction in office floorspace was unacceptable and would form a reason for refusal, despite the submission of marketing evidence provided in support of the Application.
- 5.25 In response, an email was issued to LBC on 6th May 2021 (Appendix 12) reiterating that the building had been vacant and unsuccessfully marketed for office use since July 2019, supported through the submission of further marketing evidence in the form of a marketing brochure (see Appendix 1). Following submission of the additional information to LBC, an email was received from LBC on 16th June 2021 responding positively to the additional information provided. No further concerns were raised by LBC regarding the proposed reduction in office accommodation. The GLA (in both Stage 1 and Stage 2 Reports – Appendix 8 and 9) were satisfied that the loss of office space was in accordance with the criteria outlined in the employment chapter of the London Plan and that the principle of student-led mixed-use development within the CAZ and Euston Opportunity Area, coupled with affordable workspace, was supported.
- 5.26 With regards to the reasons for refusal relating to the impact on neighbouring amenity (third reason for refusal) and the quality of the internal living conditions for future occupiers (fourth reason for refusal), no concerns were raised by LBC officers during consideration of the Application. GLA offices noted that the standard of student accommodation is very high and there was no strategic concern regarding the quality of accommodation.

6.0 PLANNING POLICY FRAMEWORK

- 6.1 In assessing the Appeal, the Secretary of State shall have regard to the provisions of the development plan so far as material to the application, to any local finance considerations (so far as material to the application) and to any other material considerations (section 70(2) Town and Country Planning Act 1990).

The Development Plan

- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that where in making any determination under the Planning Acts, regard is to be had to the development plan, the determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 6.3 The development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises the following:
- The London Plan (adopted March 2021);
 - Camden Local Plan (July 2017);
 - Camden Site Allocations (September 2013);
 - Euston Area Plan (January 2015); and
 - Fitzrovia Area Action Plan (March 2014).

National Planning Policy Framework

- 6.4 National planning policy is set out in the form of the revised National Planning Policy Framework (NPPF), which was revised on 20th July 2021. 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.

National Planning Practice Guidance

- 6.5 Planning Practice Guidance (PPG) was launched by the Government on the 6th March 2014 and provides a web-based resource in support of the NPPF. Following its launch, a number of previously published planning guidance documents have been cancelled and are detailed within the Written Ministerial Statement titled 'Making the planning system work more efficiently and effectively', also dated 6th March 2014. Further changes to the PPG have been published from time to time.
- 6.6 The PPG includes a number of sections relevant to this Appeal including, *inter alia*, advice good design principles and guidance on how to determine the effects of development on heritage assets.

Supplementary Planning Guidance

- 6.7 Both the GLA and LBC have produced a number of supplementary guidance documents, which amplify planning policy and are relevant to the Appeal. 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.

LBC Draft Planning Policy

- 6.8 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. As the Examination in Public has not yet taken place on the draft Euston Area Plan Update, it is considered that it attracts limited weight at the present time.

7.0 THE APPELLANT'S CASE

- 7.1 The Appellant's evidence will confirm that the Proposed Development is in accordance with the NPPF and adopted development plan, as set out in Paragraph 6.3. The Appellant will demonstrate that the Proposed Development would make a valuable contribution to regeneration and place-making objectives in Euston, transforming an underutilised brownfield site situated within a highly accessible location within the borough by delivering a substantial quantum of much needed high-quality purpose built student accommodation (with affordable bedspaces), high-quality flexible Grade A affordable workspace, and public realm improvements that would have a positive greater benefit to local people and businesses than the and which justify the grant of planning permission.

Reduction in Office Floorspace

- 7.2 The first reason for refusal listed by LBC in the decision notice states:

'The proposed development, due to the failure to provide adequate replacement employment space on the site, would fail to support growth in economic activity in Camden and result in the loss of employment opportunities within the borough contrary to Policies E1 (Economic development) and E2 (Employment premises and sites) of the London Borough of Camden Local Plan 2017.'

- 7.3 At present, 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.
- 7.4 Overall, the existing office accommodation, which has been vacant since 2018, is considered to be of very poor quality. As set out in the Employment Land Statement prepared by Grant Mills Wood (Core Document 28), and the supporting Marketing

Letter prepared by James Andrew International (Appendix 3 to the Employment Land Statement), the existing building has been unsuccessfully marketed for office use since the Appellant acquired the Site in July 2019, representing 26 months of marketing evidence and exceeding the 24-month requirement set out in LBC guidance.

- 7.5 In total, 23 inspections have been carried out to date, with none giving rise to a sustainable letting opportunity. In the majority of instances, the office accommodation was discounted on the basis of its poor configuration and poor quality at this location, particularly when considering the abundance of available market 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. This is further evidenced by the supporting internal photographs included in Appendix 7 of the Employment Land Statement, which show the existing office floorspace is of extremely poor quality and no longer in a habitable state.
- 7.6 The appellant will call evidence to establish 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.
- 7.7 The Proposed Development will however still provide a total of 1,255 sqm of employment floorspace at ground floor level, delivered as high-quality Grade A flexible affordable workspace. There is a market for well-presented, well-configured affordable space. Its provision here as part of a wider mixed-use development would represent a clear public benefit of the proposals. The affordable workspace will deliver a significant qualitative improvement on 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.
- 7.8 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, and has no prospect of doing so in the future in its current state. 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.

- 7.9 As such, it is considered that the proposed reduction in existing poor-quality employment floorspace has been fully justified, and the provision of permanent, flexible, affordable workspace fitted out to a Grade A rating would deliver clear qualitative improvements to the overall employment offer for both the Site and surrounding area.

Massing, Townscape and Heritage

- 7.10 The second reason for refusal listed by LBC in the decision notice was as follows:

‘The proposed development, by virtue of its height, mass, scale and footprint, would be detrimental to the streetscene, setting of the nearby listed buildings and the character and appearance of the wider area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.’

- 7.11 The Proposed Development has been through extensive pre-application consultation, gaining the support of the Mayor at GLA Stages 1 and 2. The proposals were carefully designed to respond to the relationship with the varied surrounding context, including the listed and locally listed buildings situated on Stanhope Street and the historic warehouse character along William Road and Drummond Street.

- 7.12 As evidenced by the site photographs in Appendix 13, the existing building is of extremely poor quality. The replacement building has been designed to be of the highest architectural quality. The GLA Stage 1 Report supports this position, stating that *‘the architecture has evolved with thorough contextual analysis and the resulting building proportions and façade articulation are very successful and aligned with requirements of London Plan design policies.’*

- 7.13 Similarly, the Design Review Panel response states *‘the design review panel commends the analysis, generation of ideas and design quality coming forward as part of the proposals.’*

- 7.14 As part of the Application, a Townscape, Visual and Built Heritage Assessment (TVBHA) was prepared by Tavernor Consultancy, which thoroughly assessed the proposals against 12 different viewpoints, including 3 LVMF viewpoints, which were discussed with LBC officers prior to submission of the Application.
- 7.15 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 concluded that the Proposed Development would not have any 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 the Tavernor Consultancy and LBC during pre-application stage, the Proposed Development would have localised effects on visual amenity and the character and quality of the local townscape, but none of these would be adverse.
- 7.16 The TVBHA also included a robust assessment of the impact of the Proposed Development on the relevant nearby designated heritage assets, including nos. 48-52 Stanhope Street (Grade II listed). The assessment considered 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 responses issued by Historic England (Appendix 7) and the GLA (Appendix 8 and 9).
- 7.17 The TVBHA noted 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.
- 7.18 The TVBHA concluded 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. In fact, as a result of its high design quality, the Proposed Development would enhance the streetscape of Stanhope Street and William

Road and the townscape quality of the setting of the listed buildings at Nos.48-52 Stanhope Street.

- 7.19 The proposed scale and massing of the Proposed Development has been considered in the context of its situation, surroundings and designations. The original proposals were amended through pre-application discussion to reduce the overall height in response to consultation with LBC officers. The final height and massing, extending to 15 storeys, is considered appropriate in the context of the surrounding existing and emerging context (which includes buildings of significant height), the Site's position within an Opportunity Area, and the overall package of public benefits.
- 7.20 Whilst it is not considered that the Proposed Development results in any harm to the identified designated heritage assets relevant to the Site, the public benefits offered as a result of the Proposed Development are significant and should be acknowledged. The Appellant's evidence will detail the public benefits to be delivered by the Proposed Development, which principally comprise the provision of 239 high-quality purpose-built student bedspaces, including 84 affordable bedspaces, which would meet the needs of a range of students, reflecting the student market demand in this particular location and representing an important contribution to meeting the borough's housing need, whilst also facilitating the release of existing private housing currently occupied by students, thereby meeting a key priority for LBC.
- 7.21 This need is evidenced in the up to date Demand Assessment and Market Analysis Report, prepared by Knight Frank, which is submitted in support of the Appeal. The report provides an assessment of the demand for student accommodation across northwest London and notes that currently, up to 72% of full time Higher Education students across London are required to find accommodation within private rented HMOs or by living with parents/other family members and would otherwise be unable to access university or private sector purpose-built accommodation. Across a 2.5-mile radius of the Site, this equates to 58% of full-time students.
- 7.22 The report explains that there are currently 3.5 students per available purpose-built bed space (0.28 students per bed) across both London and within the 2.5-mile radius of the Site. Based on previous trends for key student groups, the total number of students studying at HEP's within a 2.5-mile radius of the Site, is projected to increase by 24%

over the next five years. Meanwhile, the development pipeline of student accommodation within the catchment over the same period will not meet this increase in demand, assuming all 838 bed spaces are built. The student housing supply/demand imbalance within the 2.5-mile radius is therefore expected to increase to 4.3 students per bed space and will continue to place unwanted pressure on the local private rented market. The Proposed Development therefore provides an excellent opportunity to alleviate some of the pressure on the existing private housing stock within Camden by delivering 239 purpose-built student bedspaces (including affordable bedspaces), thereby potentially releasing a substantial number of private homes, including larger family homes, within the borough which may otherwise be occupied by students, which is considered to be a significant public benefit.

7.23 An overview of the wider public benefits has been summarised below:

- Replacement of a vacant 1960s office building of poor quality with no architectural merit with a new building of exemplary architectural quality, which will enhance the existing streetscene and setting of the listed buildings on Stanhope Street.
- Provision of 239 much-needed purpose-built student bedspaces, including 84 affordable bedspaces, to be developed, owned and operated by iQ, one of the UK's leading providers of student accommodation with an excellent track record of both delivering and operating high-quality marketing leading student accommodation across London and the UK; serving students attending higher education institutions in the local area, whilst supporting the higher education sector by attracting further students to surrounding campuses and meeting an identified need in the borough.
- Contributing towards the borough's Class C3 housing need by alleviating pressure from students on the existing private housing stock, notably larger family dwellings.
- Provision of 1,255 sqm (GIA) of permanent, flexible, high-quality Grade A 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, that will provide activation and surveillance to the streetscene.
- Delivery of up to 138 construction jobs per annum 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.
- Reduced and consolidated servicing and delivery demand.

Impact on Neighbouring Amenity

7.24 The third reason for refusal listed on the decision notice states:

‘The proposed development, due to its height, massing, scale and location, would result in a material loss of light and outlook as well as having an overbearing impact and an increased sense of enclosure on the occupiers of Winchester Apartments and users of Netley Primary School’s external amenity space, contrary to policy A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.’

7.25 The Daylight and Sunlight Report submitted in support of the Application, prepared by Point 2 Surveyors, provided an assessment of the likely effects of the Proposed Development on surrounding properties in respect of impacts on daylight and sunlight levels.

7.26 The height and massing of the Proposed Development was 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.

7.27 With regards to outlook, it is considered that sufficient separation distances would be provided between the Winchester Apartments and the Proposed Development, with the

footprint largely mirroring that of the existing building to ensure that existing residents continue to benefit from similar levels of outlook.

7.28 As concluded in the Daylight and Sunlight Report, owing to the Site's location within a densely populated inner 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 summarised in Section 9.0 of this Statement.

7.29 The Appellant's evidence will also demonstrate that the external amenity space at Netley Primary School will continue to be adequately sunlit throughout the year with the Proposed Development in place, as shown in the Daylight and Sunlight Report Addendum issued in support of the Appeal.

Quality of Student Accommodation

7.30 The fourth reason for refusal listed on the decision notice states:

'A number of the student accommodation units within the proposed development, by reason of their poor levels of outlook, light, internal space, accessibility, external amenity space and ventilation, would fail to provide adequate internal living conditions for future occupiers, resulting in substandard accommodation contrary to policies D1 (Design), A1 (Managing the impact of development) H6 (Housing choice and mix) and H9 (student housing) of the London Borough of Camden Local Plan 2017.'

7.31 As detailed in the Design and Access Statement, prepared by Morris + Co, the proposed student accommodation would be of the highest quality, providing an exceptional standard of living for future occupants whilst meeting an identified need for higher education institutions within the borough.

7.32 The Appellant's evidence will demonstrate that all units will benefit from excellent standard of living accommodation in terms of unit sizes, communal facilities, internal daylight levels, outlook and accessibility informed by the proposed student accommodation operator, iQ.

- 7.33 The Proposed Development has been designed with a strong focus on student wellbeing, providing bright, thoughtfully designed rooms (including 5% as wheelchair accessible or adaptable rooms) which exceed the required internal space standards. These would be delivered alongside a series of internal and external communal facilities which will enhance the quality of life for all residents, including rooftop amenity space, a gym, cinema and a series of outdoor amenity spaces at ground floor and roof level.
- 7.34 The layout and unit mix of the proposed student accommodation has been informed by market demand and the requirements of the proposed student accommodation operator, IQ, which has a focus on delivering high-quality accommodation and which, as noted, has an excellent track record of delivering and managing numerous high-quality student developments across London and the UK.

Whole Life-Cycle Carbon and Circular Economy

- 7.35 The fifth reason for refusal listed on the decision notice states:

‘The proposed development, in the absence of a whole life-cycle carbon assessment and circular economy statement, has failed to demonstrate that the proposed substantial demolition is justified or that the proposal would promote circular economy outcomes contrary to policy CC1 of the London Borough of Camden Local Plan 2017 and policies SI2 and SI7 of the London Plan 2021.’

- 7.36 In response to the above reason for refusal, the appeal submission is supported by a Circular Economy Statement and Whole Life-Cycle Carbon Assessment (including completed GLA template), both prepared by XCO2 (See Appendix 1).
- 7.37 The Circular Economy Statement has been developed in accordance with the three core guiding principles set out in the GLA’s Circular Economy Statement: Guidance (pre-consultation draft). The statement demonstrates that the Proposed Development will ensure that material and resource use is minimised as far as possible. Focus has been given to minimising the quantities of materials and other resources used, as well as ensuring materials will be sourced responsibly during construction. The Proposed Development seeks to ensure the design is flexible and adaptable, thereby increasing

the building's lifespan and minimising maintenance, and by aiming to reduce construction, demolition and excavation waste arisings. The Proposed Development will also seek to carefully managing demolition, construction, and municipal waste to maximise recycling and reuse and minimise waste sent to landfill.

- 7.38 The Whole Life-Cycle Carbon Assessment has been carried out in accordance with the latest published GLA Life-Cycle Carbon Assessments Guidance - Consultation Draft (October 2020) to give an overview of the impacts relating to embodied carbon emissions and unregulated emissions. It is proposed to review and update the results of this assessment at the next stage of the design when further information is available in respect of materials and finishes.
- 7.39 It is considered that the submission of both reports now meets the requirements of London Plan Policies SI2 and SI7. The Appellant's evidence will further demonstrate that the demolition of the existing building is fully justified (and is in fact not contested by LBC at para. 3.5 of the Officer Report), particularly when considered alongside the wider public benefits which would be delivered as part of the Proposed Development.

Remaining Reasons for Refusal

- 7.40 The remaining reasons for refusal listed on the decision notice relate to commitments which would otherwise have been secured through legal agreement made under section 106 of the Town and Country Planning Act 1990. However, as the application was recommended for refusal by LBC, a legal agreement was not progressed and additional reasons for refusal were issued. This is confirmed by LBC in Informative 1 listed in the Decision Notice.
- 7.41 To address these reasons for refusal, a legal agreement made under section 106 of the Town and Country Planning Act 1990 would be progressed with LBC to secure the relevant commitments relating to the Proposed Development.

8.0 THE APPEAL PROCEDURE

8.1 The Appellant strongly considers a Public Inquiry to be the most appropriate procedure for the following reasons:

- The evidence submitted, particularly in relation to employment, design, townscape and daylight, would be best tested by expert evidence. The evidence relating to these matters is graphic or technical in nature and an Inspector would undoubtedly benefit from a verbal, descriptive and analytical account of a complex urban condition;
- The complexities of the Site, its context, the Proposed Development and the application of the relevant planning policy warrant a public inquiry and would allow the Inspector to seek clarification on planning matters, particularly the more technical aspects;
- The inspector will benefit from seeking cross-examination of the witnesses so that key elements of the evidence can be tested.

8.2 It is considered that an in-person public inquiry would be most appropriate in this instance, given the heavy reliance on detailed visual content which is best analysed and assessed in person.

8.3 The Appellant intends to call, as a minimum, five witnesses to support the case with representatives from the following practices:

- Architect: Morris + Company
- Townscape and Heritage Consultant: Tavernor Consultancy
- Daylight and Sunlight Consultant: Point 2 Surveyors
- Planning Consultant: DP9 Limited
- Chartered Surveyor: Grant Mills Wood

9.0 CONCLUSIONS

- 9.1 This Statement of Case has been prepared in support of an appeal under Section 78 of the Town & Country Planning Act 1990 against a decision by the LBC to refuse an application for full planning permission for the redevelopment of 17-37 William Road, London, NW1 3ER.
- 9.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that if regard is to be had to the development plan for the purpose of any determination, then that determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 9.3 The existing site comprises two adjoining buildings - a vacant, part two-storey, part six-storey 1960s office building of poor architectural quality which is to be demolished and redeveloped, adjoining a seven-storey building which is to be retained and remodelled at ground floor level.
- 9.4 The Proposed Development will play an important role at both strategic and local level, transforming an underutilised brownfield site, primarily comprising poor quality vacant office space, through the delivery of a significant quantum of purpose built student bedspaces (including affordable bedspaces), permanent, flexible, high-quality Grade A affordable workspace and public realm improvements in a development of exemplary architectural quality, designed by award-winning practice, Morris + Company.
- 9.5 The Proposed Development has been sensitively and appropriately designed, having regard to the surrounding area and historic context, whilst ensuring the proposed height and massing optimises the development potential of a highly accessible site located in a central London location which is designated as an Opportunity Area.
- 9.6 The Proposed Development is capable of delivering the following significant public benefits which have to be weighed up positively in the planning balance against any perceived harmful impacts:

- Replacement of a vacant 1960s office building of poor quality with no architectural merit with a new building of exemplary architectural quality, which will enhance the existing streetscene and setting of the listed buildings on Stanhope Street.
- Provision of 239 much-needed purpose-built student bedspaces, including 84 affordable bedspaces, to be developed, owned and operated by iQ, one of the UK's leading providers of student accommodation with an excellent track record of both delivering and operating high-quality marketing leading student accommodation across London and the UK; serving students attending higher education institutions in the local area, whilst supporting the higher education sector by attracting further students to surrounding campuses and meeting an identified need in the borough.
- Contributing towards the borough's Class C3 housing need by alleviating pressure from students on the existing private housing stock, notably larger family dwellings.
- Provision of 1,255 sqm (GIA) of permanent, flexible, high-quality Grade A 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, that will provide activation and surveillance to the streetscene.
- Delivery of up to 138 construction jobs per annum 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.
- Reduced and consolidated servicing and delivery demand.

9.7 The impacts of the Proposed Development were considered at pre-application stage and fully assessed in the Application, and mitigation measures have been identified and incorporated where necessary and practicable. The Proposed Development is entirely appropriate for the Site and the surrounding area.

9.8 Overall, the Proposed Development will deliver an exemplary scheme which would have many regenerative, economic and public benefits which have to be weighed up positively in the planning balance against any perceived harmful impacts. 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 – LIST OF APPLICATION DOCUMENTS

Appendix 1 – List of Application Documents

The following documents and plans were submitted in relation to the Application. The Appellant reserves the right to rely on additional documentation as part of the Appeal.

Core Documents

Doc No.	Document Title	Author
1	Planning Application Form	DP9 Ltd
2	CIL Additional Information Form	DP9 Ltd
3	Existing and Proposed Drawings	Morris + Company
4	Design and Access Statement	Morris + Company
5	Planning Statement	DP9 Ltd
6	Air Quality Assessment	Air Quality Consultants
7	Statement of Community Involvement	Kanda
8	Daylight and Sunlight Assessment	Point 2
9	Energy and Sustainability Statement	Vitec
10	Fire Strategy	JGA
11	Phase 1 Geoenvironmental Report	IESIS Structures
12	External Building Fabric Noise Assessment	Hann Tucker
13	Environmental Noise Survey	Hann Tucker
14	Plant Noise Assessment	Hann Tucker
15	Townscape, Visual and Built Heritage Assessment	Tavernor Consultancy
16	Student Travel Plan	Caneparo Associates
17	Framework Commercial Travel Plan	Caneparo Associates
18	Delivery and Servicing Management Plan	Caneparo Associates
19	Construction Management Plan	Caneparo Associates
20	Transport Assessment	Caneparo Associates
21	Employment and Training Strategy	Storey Consulting
22	Basement Impact Assessment	IESIS Structures
23	Student Housing Management Plan	Homes for Students
24	Flood Risk, Drainage Strategy & SuDS Assessment	IESIS Structures
25	Health Impact Assessment	WSP
26	BREEAM Pre Assessment	Vitec
27	Wind Assessment	Thornton Tomasetti
28	Employment Land Statement	Grant Mills Wood

Relevant Additional Information

Doc No.	Document Title	Author
1	Additional Marketing Brochure issued 6 th May 2021	JAI
2	Circular Economy Statement	XCO2
3	Whole Life-Cycle Carbon Assessment	XCO2

Application Drawings

Drawing Title	Drawing Number
Existing North Elevation	MCO A 00210 REV P01
Existing West Elevation	MCO A 00211 REV P01
Existing East Elevation	MCO A 00213 REV P01
Existing South Elevation	MCO A 00212 REV P01
Existing Basement Plan	MCO A 00098 REV P01
Existing Ground Floor Plan - Plot A	MCO A 00100 REV P01
Existing First Floor Plan	MCO A 00101 REV P01
Existing Level 02-05 Floor Plan	MCO A 00102 REV P01
Existing Ground Floor - Plot B	MCO A 00099 REV P01
Proposed Site Plan	MCO A 00010 REV P01
Site Location Plan	MCO A 00001 REV P01
Proposed North Elevation	MCO A 01210 REV P01
Proposed East Elevation	MCO A 01213 REV P01
Proposed South Elevation	MCO A 01212 REV P01
Proposed West Elevation	MCO A 01211 REV P01
Proposed Basement Plan	MCO A 01098 REV P01
Proposed Ground Floor Plan - Plot A	MCO A 01100 REV P01
Proposed Level 01-03 Floor Plan	MCO A 01101 REV P01
Proposed Level 04-05 Floor Plan	MCO A 01104 REV P01
Proposed Ground Floor Plan - Plot B	MCO A 01099 REV P01
Proposed Level 08-13 Floor Plan	MCO A 01108 REV P01
Proposed Level 06-07 Floor Plan	MCO A 01106 REV P01
Proposed Level 14 Floor Plan	MCO A 01114 REV P01
Proposed Roof Level Plan	MCO A 01115 REV P01
Existing North Elevation	MCO A 00210 REV P01

APPENDIX 2 – LBC DELEGATED REPORT

Delegated Report		Analysis sheet		Expiry Date:	23/02/2021
		N/A		Consultation Expiry Date:	15/09/2021
Officer			Application Number(s)		
Nathaniel Young			2020/5473/P		
Application Address			Drawing Numbers		
17-37 William Road London NW1 3ER			Refer to Decision Notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Demolition (of No. 35-37) and redevelopment to provide a 15 storey (plus basement) building for use as student accommodation with affordable workspace (No. 17-33 Ground floor) and associated works.					
Recommendation(s):		Refuse Permission			
Application Type:		Full Planning Permission			
Conditions or Reasons for Refusal:		Refer to Decision Notice			
Informatives:					
Consultations					
Adjoining Occupiers:		No. of responses	06	No. of objections	04
Summary of consultation responses:		<p>Site notices: 02/12/20 - 26/12/20</p> <p>Two neutral comments were received from the occupiers of Flat 24, 23 William Road and Flat 14, 27 William Road raising the following points:</p> <ol style="list-style-type: none"> 1. No objection - is the ground floor amenity space associated with the proposal necessary. 2. Overall supportive - however, questions given to developers were not answered appropriately. 3. No direct notification letter sent from Camden Council. 4. Public realm improvements welcomed – however, unclear who is responsible for maintenance of planters – potential for vandalism etc. 5. Unclear if external student amenity space accessible 24/7 – potential to cause noise/disturbance. 6. Other large developments and Covid-19 effects vehicle access to certain roads – should be factored into CMP/traffic management. 			

APPENDIX 3 – PLANNING HISTORY

APPENDIX 3 – 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/N W	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

APPENDIX 4 – GLA PRE-APPLICATION RESPONSE

Officer response

1. *Ground floor amenity space is not considered to cause material harm to residential amenity. Amenity space is always encouraged in student schemes.*
2. *The Council does not control how the developer engages with stakeholders.*
3. *The application was advertised by multiple site notices posted on Stanhope Street, William Road, Prince of Wales Passage and Netley Street as well as within the Council's weekly list of applications. The Council does not send individual notification letters to residents. Residents are encouraged to opt-in to Camden's e-alert notification system for direct notification. The consultation process was conducted in compliance with Camden's Statement of Community Involvement (SCI). All comments submitted after the consultation end date have been accepted.*
4. *Such concerns would be addressed through a student accommodation management plan.*
5. *Such concerns would be addressed through a student accommodation management plan.*
6. *Noted. Such concerns were be considered in a construction management/traffic plan.*

Four objection comments were received from the occupants of 8 Netley Street, Flats 6, 27 William Road, 7 Pangbourne, and 236 Stanhope Street raising the following concerns:

1. Insufficient consultation (by developer and Council) – flyers do not mention 15 storey building.
2. Detrimental impact to liveability/character/appearance of surrounding area - sets negative precedent.
3. Loss of light/outlook and overbearing.
4. Increased social issues – student block and student population will be detrimental to community cohesion/local residents (mostly families).
5. Overpopulation/ too densely populated/ over studentification – limited space and facilities already over stressed/ overcrowded.
6. Additional cyclists (approx. 223 based on cycle spaces) would have detrimental impact on highways/traffic.
7. Air pollution as a result of construction works will have detrimental effect on health and welfare of local residents – already exacerbated by HS2 works nearby.

Officer response

1. *The Council does not control how the developer engages with stakeholders. The application was advertised by multiple site notices posted on Stanhope Street, William Road, Prince of Wales Passage and Netley Street as well as within the Council's weekly list of applications. The Council does not send individual notification letters to residents. Residents are encouraged to opt-in to Camden's e-alert notification system for direct notification. The consultation process was conducted in compliance with Camden's Statement of Community Involvement (SCI). All comments submitted after the consultation end date have been accepted.*
2. *See section 3.0 Design and Conservation.*
3. *See section 4.0 Residential Amenity.*

4. See section 4.0 Residential Amenity.
5. See section 4.0 Residential Amenity.
6. See section 6.0 Transport.
7. See section 12.0 Air Quality.

**Greater London
Authority (GLA)**

Stage 1

- Principle of the mixed-use redevelopment of the site to provide student accommodation, and affordable workspace is acceptable in accordance with Policies E1, H15 and H16, subject to the proposed affordable workspace and student accommodation being appropriately secured.
- 35% of the student bedrooms would be affordable, in line with the London Plan and Fast Track Route criteria, set out in Policy H15. A S106 obligation to enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured.
- The site is not located within an area identified for tall buildings and is therefore not in compliance with Policy D9. The applicant should engage closely with the Council on matters of neighbourhood amenity and local mitigation and ensure that the matters raised in the urban design and sustainable development sections of this report are appropriately addressed. No harm is identified to nearby heritage assets.
- The combined heat and power system is not acceptable and the wider heating strategy should be revised. Further information in relation to energy efficiency, energy costs, minimising overheating risk, potential for connection to a DHN and the proposed Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes of CO2 and the associated carbon offset payment that will be made to the borough. Further information is sought on flood risk. A Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste.
- The proposed development would be car-free, but arrangements for disabled persons car parking should be confirmed. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided.
- Camden Council be advised that, whilst the proposal is supported in principle, the application does not currently comply with the London Plan and Publication London Plan.

Stage 2

- The mayor is content for the local planning authority to determine the application. There is no sound planning reason for the mayor to intervene and act as the local planning authority.

	<ul style="list-style-type: none"> Initial fire safety concerns have now been overcome since previous consultation. The outstanding matters relating to land use principles, affordable student bedrooms, urban design, sustainable infrastructure and transport are addressed accordingly; and the conditions and legal obligations identified in the GLA stage 2 report ref: 2021/0304/S2, the report ref: GLA/6844/01 and the Council's officer report should be secured as part of any future planning permission. <p>GLA Stage 2 - Letter & Report (link)</p>
Thames Water	<p><u>Waste comments</u></p> <ul style="list-style-type: none"> No objection based on information provided Requests that the applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Recommends reading guide 'working near our assets'. Must notify Thames Water if planning on using mains water for construction purposes. With regard to water network and water treatment infrastructure capacity, no objections are raised. The developer should take account of this minimum pressure in the design of the proposed development (10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes).
Transport for London (TfL)	No comment.
Design out Crime (London Met police)	No objection in principle. See section 11.0 (Safety and security) for comments.
Regent's Park Estate Tenants and Residents Association (TRA):	<p>Objection:</p> <ol style="list-style-type: none"> Insufficient consultation. Does not relate/respond to nearby built environment. Excessive height. Loss of light (Winchester apartments). Loss of privacy.

6. Detrimental impact to character and appearance of nearby listed buildings.
7. Detrimental impact to LMVF viewing corridors.
8. No affordable housing provision.

Officer response

1. *The Council does not control how the developer engages with stakeholders. The application was advertised by multiple site notices posted on Stanhope Street, William Road, Prince of Wales Passage and Netley Street as well as within the Council's weekly list of applications. The Council does not send individual notification letters to residents. Residents are encouraged to opt-in to Camden's e-alert notification system for direct notification. The consultation process was conducted in compliance with Camden's Statement of Community Involvement (SCI). All comments submitted after the consultation end date have been accepted.*
2. *See section 3.0 Design and Conservation.*
3. *See section 3.0 Design and Conservation.*
4. *See section 4.0 Residential Amenity.*
5. *See section 4.0 Residential Amenity.*
6. *See section 3.0 Design and Conservation.*
7. *See section 3.0 Design and Conservation.*
8. *Affordable housing provision is not a policy requirement for this type of development.*

Site Description

The site is constituted by Plot A in 35-37 William Road and Plot B in 17-33 William Road. Plot A is a post-war office building, currently unoccupied, it comprises a 6 storey block above a 2 storey plinth. Plot B is a seven storey early 21st Century residential/mixed use building (commercial office use on ground floor level and residential use in upper floors).

The site is not located within a conservation area and not statutorily listed. It is located within the setting of nearby listed buildings (48-52 Stanhope Street), in nearby proximity to the Regent's Park (West), Fitzroy Square (South) and Bloomsbury (South-east) Conservation Areas, and within the Euston Plan Area, Euston Growth Area, Central Activities Zone (CAZ), Central London Area, SALP Knowledge Quarter and within LMVF protected viewing corridors.

Relevant History

17-37 William Road and 62-70 Stanhope Street

TP79387/23003: 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. **Approved 24/07/1958.**

7669: 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). **Approved 03/07/1959.**

TP79837/8929: 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. **Approved 22/07/1959.**

AR/TP/79837/NW: 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. **Approved 19/01/1960.**

17-35 William Road

PS9804631: 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 flats (Class C3) on the upper floors, including 12 flats for social housing. **Refused – allowed on appeal 31/03/2000.**

17-33 William Road

2003/1814/P: Erection of a single storey extension at ground floor level, side elevation, to an existing B1c light industrial unit. **Approved 29/08/2003.**

2003/2576/P: The creation of a new door and window to existing kitchen, and an additional enclosed terrace to the east side of the building. **Approved 28/10/2003.**

2015/5712/P: 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. **Approved 04/12/2015.**

2018/2613/P: 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). **Approved 25/07/2018.**

2018/5596/P: 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. **Approved 11/12/2018.**

Relevant policies

National Planning Policy Framework 2021

The London Plan 2021

Camden Local Plan 2017

Growth and Spatial Strategy

G1 Delivery and location of growth

Meeting Housing Needs

H1 Maximising housing supply

H6 Housing choice and mix

H9 Student Housing

Community, health and wellbeing

C1 Health and wellbeing

C5 Safety and security

C6 Access for all

Economy and Jobs

E1 Economic development

E2 Employment premises and sites

Protecting Amenity

A1 Managing the impact of development

A2 Open space

A3 Biodiversity

A4 Noise and vibration

A5 Basements

Design and Heritage

D1 Design

D2 Heritage

Sustainability and Climate Change

CC1 Climate change mitigation

CC2 Adapting to climate change

CC3 Water and flooding

CC4 Air quality

CC5 Waste

Transport

T1 Prioritising walking, cycling and public transport

T2 Parking and car-free development

T3 Transport infrastructure

T4 Sustainable movement of goods and materials

Delivery and Monitoring

DM1 Delivery and monitoring

Camden Planning Guidance 2019-2021

CPG Access for all

CPG Air quality

CPG Amenity

CPG Biodiversity

CPG Basements

CPG Design

CPG Developer contributions

CPG Employment sites and business premises

CPG Energy efficiency and adaptation

CPG Planning for health and wellbeing

CPG Public open space

CPG Housing

CPG Transport

CPG Student housing

CPG Water and flooding

Site Allocations Local Plan (SALP) 2020 - Draft

KQ1 Knowledge Quarter

Following approval by Cabinet in November 2019, the Council consulted on the draft Site Allocations Local Plan document. The process for preparing Local Plans includes a number of statutory stages including at least two formal rounds of public consultation. The first formal consultation on the Site

Allocations Local Plan was carried out between 13 February and 27 March 2020. The second round of formal consultation is yet to be carried out.

Report contents:

- 1. Background**
- 2. Land use**
- 3. Design and conservation**
- 4. Quality of accommodation**
- 5. Residential amenity**
- 6. Transport**
- 7. Basement**
- 8. Sustainability**
- 9. Flood risk and drainage**
- 10. Air quality**
- 11. Safety and security**
- 12. Land contamination**
- 13. Microclimate (wind)**
- 14. Employment and training**
- 15. Refuse and recycling**
- 16. S106 obligation**
- 17. CIL**
- 18. Conclusion**

Assessment

1.0 Background

Pre-application advice

1.1 Pre-application (pre-app) advice was sought prior to submission of the subject application. The proposals involved demolition of the existing office block on the corner of Stanhope Street and William Road and a new building with a student housing block and office space.

Pre-app meetings took place with Camden officers on:

- Pre-app 11/09/2019
- Pre-app 02/12/2019
- Pre-app 04/05/2020
- GLA meeting 05/05/2020
- Pre-app 13/08/2020

1.2 The scheme originally involved a 21 storey student block which was reduced to a 15 storey block during the pre-app process. The proposed uses were largely student accommodation with affordable workspace at ground floor level underneath the existing residential block on William Road.

1.3 Pre-app advice was given stating that outstanding concerns remained regarding the height and massing of the proposed tower, the loss of office floorspace and the provision of student accommodation without an end user in place.

Design Review Panel (DRP)

1.4 The proposal were reviewed by the DRP on 25th September 2020. The panel's views were requested on: height and massing; whether this location is right for a landmark building; what impact

this height might have on the pedestrian experience and viewing corridors. Officers asked the panel to comment on the level of communal amenity space provided for the prospective occupiers of the building, and the building's architecture and materiality.

1.5 The DRP reviewed different iterations of the proposed building prior to submission (at pre-app stage). All versions of the scheme were considered to be excessive in height and to not respond to the surrounding built environment. The DRP suggested rethinking the typology put forward, mentioning it could either be a podium building, with a much reduced mass, or the preferred option of a mansion block/perimeter typology, of much reduced height (around 8 storeys). As outlined further in this report (below), the resulting application has not responded to these comments and was submitted without significant amendments. The full DRP report can be found in appendix 1 of this report.

1.6 Extract from DRP's summary:

"...it (the panel) considers that the proposed brief is too challenging, forcing a scheme that results in significant overdevelopment of the site, one that puts viability before city making. It considers the proposals are over scaled in bulk and height and mix two confused building typologies. The panel encourages careful thought around whether the building is a stand-alone tower in open space, or a piece of street in the form of a reimagined warehouse / mansion block. In either case, massing must be refined to ensure the scheme respects both the streetscape and the skyline. The panel commends the quality of architectural expression, particularly the sculpted entrance to the student accommodation on William Road. While the proposed student rooms appear to be high quality the panel would like to see a long term operator in place to ensure this quality is delivered. The use of a single stair requires careful consideration to ensure it is a sustainable approach that ensures the building is futureproofed. The panel is concerned with the lack of outdoor amenity space proposed and would like to see more of this provided. While internal amenity space is welcomed, the function and quality of this should be thoroughly scrutinised, and should contribute to the sense of community within the building."

Greater London Authority (GLA)

1.7 The GLA provided their stage 1 report 8th March 2021. The recommendation stated that:

"Camden Council be advised that, whilst the proposal is supported in principle, the application does not currently comply with the London Plan and Publication London Plan. for the reasons set out in paragraph 92 of this report."

1.8 Within the 'urban design' section of the GLA report it was stated that:

"...the site is not in a location that is identified as suitable for a tall building, as Camden's Local Plan considers all parts of the borough as sensitive to the development of tall buildings. Therefore, whilst there are various characteristics of this site that offer material considerations for developing a tall building on the site, as noted above, this is a location that the local plan envisages as sensitive to tall buildings. Noting that London Plan Policy D9 states that tall buildings should only be developed in locations that are identified in development plans, it falls to officers to consider whether there might be material considerations that could justify a tall building at this site. Key to this exercise will be a robust assessment of the impact of the proposed tall building against the criteria within London Plan Policy D9, in conjunction with consideration of the public benefits of the proposal."

"...the site is not located within an area identified for tall buildings and is therefore not in compliance with Policy D9. The applicant should engage closely with the Council on matters of neighbourhood amenity and local mitigation and ensure that the matters raised in the urban design and sustainable development sections of this report are appropriately addressed."

1.9 The Council have assessed the height and massing of the submitted application, giving the consideration to the above, and considers it to be unacceptable. See Section 3.0 (Design and conservation) for further comments.

2.0 Land Use

Existing situation

2.1 The 0.21 ha site comprises two adjoining buildings situated to the south of William Road and east of Stanhope Street. It is bound to the south by the rear of a UCL student accommodation building, known as Schafer House, and to the east by an adjoining office building at no. 11-15 William Road.

2.2 No. 35-37 ('Plot A') comprises a part two-storey, part six-storey 1960s office building with a basement level, on the corner of William Road and Stanhope Street. The building is of poor architectural quality and is currently vacant.

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. The residential element is to be retained as existing and does not form part of the proposals.

2.4 The application site is located within the Euston Opportunity Area and Central London Area (CLA), both of which serve an important economic function in the future growth of Euston and London as a whole.

2.5 The application site currently provides 3,693 sqm GIA of office accommodation and ancillary storage space. Existing building accommodation:

- Total Office NIA: 3,017sqm/ 32,476sqf
- Site A NIA: 2,032sqm/ 21,873sqf
- Site B NIA: 985sqm/ 10,603sqf

Proposed development

2.6 It is proposed to demolish and replace the current building at 35-37 William Road with a PBSA building (Purpose Build Student Accommodation). The proposals include the 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. 17-33, with a small ancillary element in no. 35-37, 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.

2.7 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):

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

Loss of office space

2.8 Policy E2 states that the Council will protect premises or sites that are suitable for continued business use, in particular premises that support the functioning of the Central Activities Zone (CAZ) or the local economy. The Council resists development of business premises and sites for non-business use unless:

- a) It can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; **and**
- b) There is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.

2.9 Policy E2 also states that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that:

- c) the level of employment floorspace is increased or at least maintained;
- d) the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;
- e) it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;
- f) the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
- g) the scheme would increase employment opportunities for local residents, including training and apprenticeships;
- h) the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and
- i) for larger employment sites, any redevelopment is part of a comprehensive scheme.

2.10 The proposal would result in the loss of approx. **2,438** sqm of office accommodation and ancillary storage space. The proposal would retain approx. 1,255 sqm GIA of office accommodation and provide it as an affordable workspace. Whilst it is encouraging that all the workspace provided would be affordable, the amount of office floorspace lost is significant and is considered to be unjustified.

2.11 With regards to the affordable workspace, the applicant initially offered it at 80% of market value and then reduced this to 65% of market value. Neither offer is considered to be a meaningful discount, particularly given the rental rates in this area (Euston). Assuming that this affordable workspace is provided as new, the “market rental” rate this discount is based on is likely to be higher than what this space has been marketed at currently. The Council expects discounts of 50% for affordable workspace as a baseline, as set out in the 2020 draft Site Allocations Local Plan (SALP) policy for the Knowledge Quarter (KQ1).

2.12 A lack of information has been submitted detailing how the space would be let or managed (i.e. letting to a single occupier, leasing to a workspace provider, or managing themselves as flexible workspace etc). Without this information officers are unable to determine the quality and suitability of the affordable workspace for small to medium size enterprises (SMEs). The applicant argues that there is an abundance of employment space available in the Euston Plan Area and that there is a lack of demand for this quantity of traditional office space. Flexible and affordable workspace may be more desirable; however, it has not been demonstrated that the offered workspace would be truly ‘affordable’, flexible or suitable for SMEs. Additionally, whilst it is acknowledged that the Knowledge Quarter policy in the 2020 draft SALP has limited weight at this point in time, the expectation would be for any permitted use to specify knowledge economy occupiers – this has not been explored by the applicant. As such, the overall loss of employment space is not mitigated by the offer of ‘affordable’ workspace.

2.13 Notwithstanding an affordable workspace offer, it is not considered that criteria a) and b) of local plan policy E2 have been met. Whilst marketing evidence has been submitted which appears to meet the required timeframe, it has not been adequately demonstrated that the existing employment space is not fit for purpose and could not be redeveloped and re-provided within the new scheme. This should first be considered before relying on marketing evidence and the provision of significantly less ‘affordable’ workspace to justify the substantial loss of employment space.

2.14 The site is located on the edge of the Central Activities Zone (CAZ) and within both the Euston Plan Area and Knowledge Quarter, and can be accessed via Hampstead Road. Its location is considered to be highly suitable for an alternative employment use as part of any development. The expectation under policy E2 parts a) and b) is that the redevelopment would realise the opportunity to incorporate replacement floorspace to address the identified shortcomings of the premises as existing. Given the uplift in overall floorspace proposed as part of the development, a reduction from 3,693sqm of accommodation (with ancillary storage space) down to the 1,255 sqm as affordable workspace is not considered to address this key policy requirement.

2.15 The loss of employment space, considered suitable for alternative business use as part of a new development, would fail to support growth in economic activity in Camden and result in the loss of employment opportunities within the borough contrary to Policies E1 (Economic development) and E2 (Employment premises and sites) and forms a reason for refusal.

Provision of student accommodation

2.16 Policy H9 (student housing) states that ‘The Council 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’.

2.17 Policy H1 (Maximising housing supply) states that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. It goes on to state that the Council seek to exceed the target for additional homes, particularly self-contained homes by regarding self-contained housing as the priority land-use of the

Local Plan. The proposed development would not provide any Class C3 housing (the priority land use) when there is opportunity to do so. The proposal would still however offer a form of housing which would contribute towards the Council's targets. The site has not been specifically identified for self-contained housing in site allocations and the proposal not considered to directly prejudice the provision of self-contained housing and there is no recent permission for self-contained housing.

2.18 Issues regarding criteria H9 d) (space standards) and f) (range of flat layouts) are assessed in section 4.0 (Quality of accommodation) of this report (below). In terms of the proposed student housing use, policy H9g of the Camden Local Plan states that student housing should "have 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." It should also be ensured that student housing is let to eligible students for the full duration of all terms in the academic year, and in any event not for less than a single term; and that all accommodation is managed as a single planning unit and individual parts are not disposed of as independent self-contained homes. These terms would need to be secured by way of an S106 legal agreement. In the absence of a legal agreement to secure this affordable student accommodation and secure nominations to the majority of rooms for specific educational institutions, this would form a reason for refusal.

Affordable student accommodation

2.18 It is understood that the applicant would prefer to use the 'affordable rent route' as opposed to the 'full nominations agreement route' as detailed in CPG Student housing, if the scheme were to be acceptable. The proposed development would deliver 84 affordable student bedspaces, representing 35% of the total student accommodation provision. The proposed affordable units would 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 Local Plan and London Plan requirements. In the absence of a legal agreement to secure this affordable student accommodation (or a full nominations agreement), this would form a reason for refusal.

Balanced and mixed communities - studentification

2.19 The Euston Area Plan 2015 currently envisages up to 25% of additional housing in the Plan area will be for students. The Local Plan 2017 has a target of 2,400 additional student rooms (Borough-wide) from 2016-2031, which is 160 per year. Based on the Euston Area Plan, it is anticipated that 1,000 student rooms will be delivered from the Euston Station and Tracks/ Camden Cutting area, but development will not commence until the first phase of the HS2 rail project completes, currently scheduled for 2029.

2.20 Local plan policy H9j seeks to ensure new student housing development "does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity." Student Housing CPG – para 3.12 (page 22) states that where students are more than 25% of ward residents, or there will be more than 800 student beds in a 300 metre radius then it is considered that there may be an over-concentration of students in the local community.

2.21 Student Housing CPG - Appendix B (page 62) table shows that students represent around 17.5% of the population in Regent's Park (2018 figures). Student Housing CPG - Appendix C (page 63) map, along with the Council's records of student accommodation, shows there are approximately 369 student rooms in this location (at Schafer House), and 50 beds to the west (Pranker House, North Gower Street) (an existing student block of 184 rooms at 200 Euston Road and a permitted student block of 78 rooms at Stephenson Way are just outside the radius). As such, an additional 239 students here would not breach the para 3.12 threshold.

2.22 The site is considered to be an appropriate location, within walking distance of the main university of London campus (including UCL, SOAS, Birkbeck etc), University of Westminster and The University of the Arts (Central St Martins).

3.0 Design and Conservation

3.1 The NPPF, the London Plan and Camden's Local Plan (policies D1 and D2) place great emphasis on conserving heritage assets in a manner appropriate to their significance, and emphasise the importance of good design. CPG Design seeks "excellence in design" in Camden. Policies at all levels require buildings, streets and spaces to respond in a manner which promotes inclusive and sustainable development and contributes positively to the relationship between urban and natural environments and the general character of the location.

3.2 According to Policy D1 in relation to tall buildings, 'All of Camden is considered sensitive to the development of tall buildings'. This means that each proposed tall building should be carefully scrutinised and go through detailed design assessments. This also includes:

- How the building relates to its surroundings, both in terms of how the base of the building fits in within the streetscape and how the top of a tall building affects the skyline
- The historic context of the building's surroundings
- The relationship between the building and hills and views
- The degree to which the building overshadows public spaces, especially open spaces and watercourses
- The contribution a building makes to pedestrian permeability and improved public accessibility

Context and relationship with surroundings

3.2 The site sits on the corner of William Road and Stanhope Street and is part of a block that is enclosed by Drummond Street to the south and Hampstead Road to the east. Building heights are relatively consistent within the block, at present the highest is six storeys and some of the lower buildings are generally four storeys. There is a mixed architectural style within the block, which includes three early 19th century grade II listed buildings on Stanhope Street, two early 20th century locally listed warehouse buildings and various later developments that have varying degrees of architectural integrity.

3.3 The wider area comprises a mixture of buildings types. To the south is Euston Tower and various other tall buildings creating a distinct commercial area. North of Drummond Street, this character changes as buildings become much lower at four and five storeys and the street more domestic in scale. There are some high rise social house blocks set away from the street edges and contained within their own plot. To the east is Euston Station, the British Library, St Pancras and King's Cross stations. To the west is the Regent's Park conservation area which has both national and international importance as a unique piece of urban design by John Nash.

3.4 Development of the site is welcomed as the present building has little architectural merit and does not enhance the street scape. The two storey element also detracts from the consistency of height on the block creating an incoherent and visually unappealing corner. However, the proposed tall building is not considered appropriate for the site. There is a clearly established building height in the locality which ranges from four to eight storeys, a tall building would deviate from this creating an anomaly within the block and also the immediate and surrounding area. In addition, the corner site is not considered an appropriate location for a prominent building as it is flanked by two subsidiary streets, with predominantly residential buildings as neighbours, as a result, a tall building is not suitable.

Scale and massing

3.5 The proposed demolition of the existing building is not contested in terms of design and conservation, as the building is of neither good design/quality and does not make best use of the site. However, the demolition can only be supported if the replacement building is suitable. The submitted development presents a substantial increase in height within the existing perimeter block, being 15 storeys in height.

3.6 The proposed development is considered too tall for the location, and does not sit comfortably within the immediate area, where height varies from four to eight storeys, with a majority of buildings of around four storeys. Although there are some tall buildings in the area, the location of the site is not appropriate for accommodating a tall building as it is part of a perimeter block with relatively consistent (low) building heights where height varies from two to eight storeys, with a majority of buildings of around four storeys.

3.7 It is not considered that the location of the block is appropriate to warrant a tall 'landmark' building. The site is on a 'secondary' street located away from the main roads and surrounded by back streets.

3.8 As mentioned in the site appraisal, although there are tall buildings to the south of the site, there is a clear shift in character and scale north of Drummond Street. Buildings north of Drummond Street are of a more domestic scale, normally between four and seven storeys. The network of streets support this scale with pavements and road widths responding to the heights of the buildings. A fifteen storey building would have an incongruous relationship with the surrounding buildings and loom over streets having a negative impact on the pedestrian experience.

Overdevelopment

3.9 The site is not considered large enough to accommodate a building of this height, excessive mass and scale, and therefore it is considered that there is too much development. The proposal for Plot A occupies the entire site footprint and is built directly on the back of a narrow pavement, contrary to some of the taller buildings and towers around the area which sit back from the building line and have a less negative impact onto the public realm. Examples of this in the immediate area are the Netley building opposite, 8 storeys high but with a generous setback for external amenity space and breathing space, or the towers on the Regent Park Estate -which are on a podium, setback from the street and are part of a wider masterplan with a series of open spaces and elements of varied density and scale. Several tall buildings on Euston Road also provide a similar building setting and have setbacks that increase the area of external public space.

3.10 The other mentioned developments give something back to the site they fall within and offer a range of public benefits, such as front verges and expansive public space. The pavement widths on William Street and Stanhope Street are 3.2m and 3.3m wide respectively, and the proposed building would rise sheer from these pavements to the full 15 storey height except at the chamfered corners, and with some relief attempted via a fake parapet line to break up the facade at the top of the sixth storey.

3.11 The chamfered corner, the setbacks and recesses are attempts to reduce the visibility and impact of the building's mass onto its surroundings. These moves are not considered sufficient to reduce the negative impacts of the proposal, and the proposed block appears tall, wide and out of proportion in relation to the surrounding buildings. Even when comparing the proposed building to Regent's Park Estate towers, these are slimmer and setback from the street.

Impact on public realm

3.12 There are concerns on how the height and density of the proposal would feel dominant onto the street and make it feel 'tight' or restricted in the surrounding public realm. In particular, having the building come all the way to the edge of the footway would create an overbearing feeling on the pedestrian experience.

3.13 An interior open courtyard at ground floor, and an open terrace and loggia at floor 14 are proposed as areas for private amenity use, as well as ground floor openings for planters and benches. This proposed outdoor amenity space falls short of what officers would expect of a building of this size and density, and this is particularly crucial in pandemic and post-pandemic times where access to outdoor space should be maximised (this is re-emphasised in quality of accommodation section of this report (below)).

Design quality

3.14 Although officers acknowledge that the emerging architecture and detailed design of the proposal are of merit, in particular the design of the ground floor and the façade studies, it does not compensate the negative impact and harm caused by the height, massing and scale of the scheme.

Heritage

3.15 The site is in close proximity to three grade II listed buildings on Stanhope Street. No's 50 and 52 were both built circa. 1804, both are three storeys with basements, however no.50 has rendered upper storeys with timber weatherboarding at ground floor level, and no.52 is constructed from multi stock bricks. No. 48 is the Lord Nelson Public House built circa. 1899 and is four storeys.

3.16 Officers note that the GLA have not identified any harm to heritage assets. Officers however do not agree with this view. The height and scale of the building would impact the setting of the listed buildings on Stanhope Street. As stated, the buildings are between three and four storeys and are representative of the historic urban grain. The buildings would be dominated by a building of a proposed 15-storey scale, with the eye drawn to the larger rather than the historic elements of the street. At present the listed buildings sit comfortably within the 'block' and although they are flanked by larger buildings, can still be understood and appreciated. The proposed large 15-storey building would disrupt the rhythm of the block, compromising the listed building's position within it. The modern and large buildings to the south should not be considered to set a precedent for buildings of the proposed scale, as there is an entirely different context south of Drummond street with virtually no historic buildings remaining. Buildings are of a variety of ages within this block, all of which have a more human scale, this is an important characteristic that should remain to protect the setting of the listed buildings.

3.17 The proposed tall building would be out of scale with the listed buildings, which have dictated the scale of emerging buildings over the last two centuries. The height of the proposed building would loom over the listed buildings when looking north along Stanhope Street detracting from their contribution to the street and causing material harm to their setting. Considerable importance and weight has been attached to the harm and special attention has been paid to the desirability of preserving or enhancing the character or appearance of the listed buildings including their settings, under section 66 of the Listed Buildings and Conservation Areas Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013. The proposal would fail to accord with policies D1 and D2 of the Camden Local Plan 2017 and Section 66 of the Listed Buildings and Conservation Area Act 1990.

Impact on views – long and short

3.18 The development would sit above both the LVMF 5A.2 and LVMF 2A.2 threshold line, although the Design and Access Statement states it will have 'no material effect on the LVMF' as most of the development would be obscured by other taller buildings. Although this might be correct, the concerns raised by both Camden officers and the DRP is that medium and short views would be significantly affected.

3.19 It is acknowledged that design work has been done to mitigate this impact at ground floor through the consideration of various building elements and datum lines to bring the scale down at ground level. However there is still concern the proposal is likely to have a detrimental impact in the immediate context, as approaching the site from various points and when standing by the tower element. This is particularly evident in the view from Stanhope Street facing north, where there is a stark contrast between the Georgian terraces at the foreground and the proposed tower. The negative impact is also visible in views closer to the development, nearing the junction, where the building dominates and impacts the pedestrian experience.

Open space

3.20 Camden's Local Plan identifies areas with an under-provision of public open space as well as areas deficient in public open space. In these areas, the priority is for the provision of public open space

on site. Any development that would result in an increased demand for public open space are also expected to provide public open space on site

3.21 There is no significant public benefit to the public realm or open space as part of this application. Section 9 indicates tree species in the public highway that could enhance the public realm experience around the building, but these are outside of the demise of the development.

3.22 No Urban Greening Factor (UGF) score has been submitted as part of the submission. The maximum open space contribution would need to be sought to offset the considerable impact the new residents would bring to the area via a financial contribution within S106 legal agreement. This investment would be available to all open spaces sites within the vicinity of then development. As planning permission is refused, the failure to secure a payment in lieu of public open space would form a further reason for refusal.

3.23 Public open space contribution calculation (details on how to calculate contribution can be found in CPG Public Open Space):

- 97 studios = 873 sqm
- 71 twodios = 1,278 sqm
- Total requirement = 2,151 sqm - 82 sqm (proposed external amenity) = 2,069 sqm
- $2,069 \times 200 = £413,800$
- **$413,800 \times 0.75 = £310,350$**

Summary

3.24 The proposed development, by virtue of its height, mass, scale and footprint, would be detrimental to the streetscene, setting of the nearby listed buildings and the character and appearance of the wider area, contrary to policies D1 (Design) and D2 (Heritage) of the Local Plan.

4.0 Quality of Accommodation

Space standards

4.1 Policy H9 criterion d) requires proposals for student accommodation to comply with any relevant standards for houses in multiple occupation (HMOs); the details of which are summarised in CPG student housing. The Council's current minimum HMO standards were adopted in 2020. They include space standards and requirements in relation to heating, power, fire detection and alarms, kitchen facilities (food preparation and storage, cooking, ventilation, sink and waste), baths/ showers, wash basins and toilets. Depending on the particular circumstances of the HMO, the minimum space standard for a sleeping room (excluding kitchen and personal hygiene facilities) varies from 7.1 sqm to 9 sqm.

4.2 Policy D1n. of the Local Plan requires a high standard of accommodation from development. Paragraph 7.32 of the supporting text requires all residential development to create high quality homes, which have good ceiling heights and room sizes, good natural light and ventilation and to be dual aspect except in exceptional circumstances. Local Plan Policy H6 also encourages design of all housing to provide functional, adaptable and accessible spaces.

4.3 The majority of the single bedrooms measure approx. 8.4sqm in the twodios (two single bedspaces sharing a kitchen and bathroom) and 9.7 sqm in the sleeping areas of studios, with the exception of a small number of larger corner studios. Smaller studios also provide a kitchenette and WC, wash and shower room taking the total area to 16.3 sqm. Twodios also provide a shared kitchen-diner of approx. 8.6 sqm and a shared WC, wash and shower room of approx. 1.8 sqm. The areas do not meet the HMO standards set out in CPG student housing as the floor area for a shower, WC and wash basin should be 2.2 sqm. The floor to ceiling meets minimum standards but should ideally be 2.5m or greater due to the urban heat island effect which is experienced in this central London area, particularly given the small room sizes, lack of open space and lack of ventilation which is proposed.

Layout and unit mix

4.4 Policy H9 criterion f) requires that student accommodation includes a range of flat layouts including flats with shared facilities wherever practical and appropriate. CPG Student housing states that the Council will generally expect applications to satisfy the following guidelines:

- at least half the bedspaces should be provided in cluster flats providing a number of study-bedrooms with some shared facilities;
- no more than half of the bedspaces should be provided in studio flats that contain all basic amenities for exclusive use of the occupants (kitchen, bathroom, toilet);
- a proportion of the bedspaces should be in study-bedrooms and studio flats (where present) designed for single occupancy;
- a proportion of the bedspaces should be in study-bedrooms and studio flats (where present) designed for double occupancy, this should be the minority of bedspaces unless the scheme is specifically intended for occupation by postgraduates; and
- consideration should be given to inclusion of other lower cost accommodation, such as two study-bedrooms sharing a kitchen-diner and bathroom.

4.5 Cluster flats are defined as a group of study bedrooms sharing communal facilities. The cluster flat will generally provide all the basic needs for everyday life including a kitchen, bathroom and toilet. Typically, a cluster flat comprises 4 to 8 study bedrooms and a communal kitchen-diner (sometimes combined with a living room).

4.6 The proposed development offers only studios (97) and 'twodios' (71) (two single bedspaces sharing a kitchen and bathroom) and as such fails to meet the guidelines above. No cluster flats are provided, nor are there any living rooms/dining areas or shared communal space for occupiers to congregate in and interact with one another on their own floor. The only internal amenity spaces are located in the basement (approx. 82 sqm), and on the ground floor (approx. 182 sqm) and fourteenth floors (approx. 274 sqm) (i.e. and both extremes of the building). The proposed layout is not conducive to any convenient social interaction, particularly for those located on the middle floors. While the overall area of internal amenity space is consistent with the benchmark of 0.1 to 0.2 sqm per bedspace given in CPG student housing, there is a general lack of open space on other floors which would create a 'boxed-in' feeling. The corridors are tight and there is a single narrow stair core making the whole arrangement feel restricted and anti-social and raises concern regarding emergency escape.

4.7 As stated later in section 11 (safety and security) of this report, concern is raised with the proposal for a single stair core in a building which is significantly over 18 metres in height. Fire safety is an important issue and designs may be compromised by changes in regulations in the future. This has would need to be further reviewed in accordance with the relevant requirements and may result in the need for substantial internal layout changes.

4.8 A number of flats would be located directly below the fourteenth floor internal amenity area. Concern is raised regarding noise and disturbance to future occupiers of these flats and the stacking of different room types.

4.9 CPG student housing indicates that students should be provided with adequate facilities to wash and dry clothes. The only provision evident in the scheme is an area of approx 4.7 sqm on the fourteenth floor identified on the plans as a launderette, which would not seem convenient or sufficient for a block with potential occupancy of 239 students. It appears floor plans for floors 1-3 are missing from the proposal, the Council is unable to comment on the quality of these floors, a condition requiring detailed layouts of floors 1-3 would need to be submitted and approved if permission were to be granted.

Access to light and outlook and ventilation

4.10 Paragraph 7.32 of the Local Plan 2017 states that the Council will seek to ensure that residential development is dual aspect except in exceptional circumstances, has good natural light and ventilation. With the exception of a small proportion of corner units, the majority of the studios and twodios are single aspect, many of which are solely north facing. Occupiers of the north facing twodios in particular would receive inadequate levels of light and outlook. Also for all of the twodios, only the bedrooms contain a window, the shared kitchen and bathroom have no access to light or outlook. Only a small panel on each window can be opened with the majority being fixed shut. The occupiers of the south facing bedrooms in particular would experience uncomfortable levels of heat with such a small window opening, small room sizes and the inability to 'wedge' fire doors open.

4.11 Rooms within such student accommodation buildings can be occupied for a whole year and potentially a number of years by the same tenants and it is not considered that the 'short' term/transient nature of the occupancy justifies a substandard quality of living accommodation.

Privacy and overlooking

4.12 Future occupiers are unlikely to be overlooked by neighbouring buildings or other occupiers of the same building. Sufficient distance from neighbouring buildings (over 18m) is maintained and rooms arranged in a way which does not give opportunity to overlook other bedsits within proposed building.

Amenity space

4.13 Minimal external amenity space is offered for a proposal which provides 239 student rooms. This is considered to have a detrimental impact on the quality of life of the prospective occupiers. A single small outdoor area on the ground floor and one loggia on fourteenth floor is not considered to be sufficient. A combination of small rooms, insufficient communal space and a lack of nearby public amenity space exacerbates the impacts of a lack of private external amenity space. Regent's Park is not easily accessible, travel to the park would involve crossing multiple busy roads and navigating the relatively impermeable Regent's Park estate, there is no direct route.

Accessibility

4.14 Policy C6 of the Local Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design. Para 4.24 of CPG Student housing indicates that, based on Building Regulations, 5% of bedrooms should be accessible (which is 12 bedrooms out of 239). Building Regulations Part M1 (vol 2) page 42/ para 4.24 indicates 1 in 20 bedrooms should be wheelchair accessible. Three units within the development are proposed as accessible with a further nine provided as adaptable (meeting the numerical requirement for accessible rooms in student accommodation, but not satisfying the Building Regulation requirement for wheelchair accessibility at the time of completion). The proposal fails to meet the above requirements fully, and as such forms a reason for refusal.

4.15 The Council's Building Control service have advised that the inclusion of adaptable rooms may be accepted if it can be shown that the dimensions and layout are able to genuinely accommodate simple conversion to full accessibility. There do not appear to be any accessible or adaptable units shown on the plans submitted with the application. This element of the reasons for refusal could potentially be overcome if plans were submitted showing 12 wheelchair accessible bedrooms (potentially including a proportion of easily adaptable bedrooms) with suitable dimensions and layout for wheelchair users.

Summary

4.16 A number of the student accommodation units within the proposed development, by reason of their poor levels of outlook, light, internal space, accessibility, external amenity space and ventilation, would fail to provide adequate internal living conditions for prospective occupiers, resulting in substandard

living accommodation that would be harmful to the amenities of future occupiers, contrary to policies D1 (Design) and A1 (Managing the impact of development) H6 (Housing choice and mix) and H9 (Student housing) of the London Borough of Camden Local Plan 2017. Some of the issues raised may be ameliorated through provision of detailed layout plans for levels 1-3.

5.0 Residential Amenity

Daylight/sunlight

5.1 The application is supported by a Daylight and Sunlight Assessment dated 20th November 2020. The report is authored by Point 2 surveyors, who have based their study on the various numerical tests laid down in the Building Research Establishment (BRE) guide 'Site Layout Planning for Daylight and Sunlight: a guide to good practice, 2nd Edition' by P J Littlefair 2011.

5.2 In terms of impact on neighbouring occupiers, the report makes use of three standards in the assessment of existing versus proposed daylight and sunlight levels:

1. Vertical Sky Component (VSC) - A measure of the amount of sky visible at the centre of a window. *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.*
2. Daylight Distribution (DD), also known as No Sky Line (NSL) - The area at desk level inside a room that will have a direct view of the sky. *The DD figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).*
3. Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months.*

5.3 In practice greater flexibility is usually afforded to VSC levels in urban environments, where a retained level of over 15% VSC can be considered consistent with comparable daylight levels at ground level and above in Central London traditional streetscapes -however it should be borne in mind that the setting of this site being a planned mid-20th century housing estate development with open spaces between blocks will mean an expectation of daylight levels somewhat above the central London norm.

5.4 The submitted document claims that all neighbouring windows (that have a requirement for daylight or sunlight) pass the relevant BRE diffuse daylight and direct sunlight tests. With regards to the relevant Regent's Park estate properties and Stanhope Street properties, the assessment demonstrates that all changes in VSC (vertical sky component) and NSL (no-sky line) as a result of the Development to all windows and rooms in these properties are less than 20% their existing level and will be unnoticeable to the occupants. However more significant reductions in VSC and NSL are predicted for both Winchester apartments and 17-33 William Road. These are assessed in further detail below.

Winchester Apartments

5.5 This property comprises multiple balconies that cut skylight from the top part of the sky being received in the window below. With the balconies in place, of the 76 windows assessed, 33 experience unnoticeable changes in VSC, 18 windows between 20-30%, 18 windows between 30-40% and 7 windows greater than 40% loss. In terms of NSL, of the 44 rooms assessed 18 experience unnoticeable changes, 3 rooms between 20-30%, 5 between 30%-40% and 18 rooms greater than 40%.

5.6 With the balconies removed, of the 76 windows assessed, 33 experience unnoticeable changes in VSC, 22 windows between 20-30%, 20 windows between 30-40% and one window experiences a greater than 40% loss. In terms of NSL, of the 44 rooms assessed 18 experience unnoticeable changes, 3 rooms between 20-30%, 6 between 30%-40% and 17 rooms greater than 40%.

5.7 For over 40 windows, both the VSC is less than 27% and the proportional losses are over 20% (below 0.8 times its former value) which exceeds the BRE Guidance.

5.8 The 'without balconies' analysis reveals that there are still an extensive number of failures of the BRE guidelines with many habitable rooms (bedrooms, living/dining rooms and living/dining/kitchen rooms) reduced to approx. 0.7 and more below their current VSC values where the existing levels are currently acceptable to the margins of acceptability as described for inner urban areas and in some cases below. In most cases the 'no sky line' (NSL) test is similarly below acceptable target levels. This large amount of failures to windows (VSC) and rooms (NSL), both with and without the balconies, is a further indication of the excessive height of the proposal not being appropriate for this particular context.

5.9 In terms of sunlight, all rooms continue to receive acceptable levels of APSH with the development in place.

17-33 William Road

5.10 East of the site and referenced '4' on the Plan, this property is identified as containing residential accommodation. The analysis considers the effect on 53 windows serving 46 site facing rooms.

5.11 Of the 53 windows, the proportional reduction of VSC to 45 are less than 20% and will be unnoticeable. Of the remaining 8 windows, both the VSC is less than 27% and the proportional losses are over 20% (below 0.8 times its former value) which exceeds default BRE Guidance.

5.12 All rooms which have a window orientated within 90 degrees due south experience unnoticeable changes in APSH.

Netley Primary School Amenity Space

5.13 Consideration has not been given to the surrounding external amenity spaces in the area in the submitted daylight/sunlight assessment. In particular, the Netley Primary School's amenity space would be cast in shadow for long periods of the daytime when it is most likely to be in use by the school.

Outlook and overbearing

5.14 The presence of the 15 storey tall tower, which is both taller and wider than the existing building, is considered to have material loss of outlook to occupiers of the south facing flats of the Winchester apartments (due north of the site). Currently occupiers of the south side of Winchester apartments have views out above 35-37 William Road, particularly over the 2-storey plinth, but also the 6-storey element for those occupying the top floors. Occupiers also currently have access to outlook to either side of the 35-37 William Road, as there is a significant gap between Nos. 17-33 and Nos. 35-37 William Road.

5.15 The proposed building would not only be nearly double the height of the Winchester apartments but also infill the spaces which exist between the buildings on William Road which offer permeability and a sense of openness. This in combination with the lack of relief offered by the proposed building, with no open space surrounding the structure and only having an approx. 20m distance from the rear elevation Winchester apartments, would result in a large and impermeable wall which would both block a significant amount of the light and outlook but feel overbearing and overly dominant. The overbearing nature of the building would detrimentally impact Winchester apartments and be oppressive and cause an increased sense of enclosure on the surrounding buildings and external amenity spaces, such as the Netley Primary school garden adjoining Winchester apartments and the far south-western balconies of 17-33 William Road.

Overlooking and privacy

5.16 Sufficient distance is retained between the subject building and neighbouring buildings as to not result in an undue level of overlooking or loss of privacy. An approx. 20m separation would be retained between proposed tower and the Winchester Apartments opposite. The two buildings on the opposite side of Stanhope street (Pangbourne and the Samuel Lithgow Youth Centre) do not contain habitable windows on the elevations facing the proposed tower to be overlooked. Views towards the Regent's Park Estate building to the north-west of the site (diagonally opposite), would be oblique, not giving direct views into habitable rooms, and would be approx. 20m away.

Noise

5.17 The submitted noise related assessments have been reviewed the Council's environmental health officer who raises no objections (subject to conditions). The nearest residential receptors are located to the north and south of the proposed development. It is proposed that 2No. ASHPs, 2No. ACU-BG and 1No. ACU-14 are to be located on the roof along with a Mechanical Smoke Vent AHU (which is understood will operate in emergencies only). It is understood that all plant could be operational up to 24 hours. Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, Camden Council's Local Plan, version June 2017 and BS 4142:2014 etc. Plant noise emission criteria have been recommended based on the results of the noise survey and with reference to the Local Authority's requirements.

5.18 The assessment indicates that the proposed plant should be capable of achieving the proposed environmental noise criteria at the nearest noise sensitive residential windows and therefore acceptable in environmental health terms. Conditions could be attached restricting office operating hours, use of external amenity space by student occupiers, servicing hours and internal and external noise levels if the scheme were to be acceptable.

Summary

5.19 Overall, the proposed development, due to its height, massing, scale and location, would result in a material loss of light and outlook as well as having an overbearing impact and an increased sense of enclosure on the occupiers of Winchester Apartments and users of Netley Primary School's external amenity space, contrary to policy A1 (Managing the impact of development) of the Local Plan.

6.0 Transport

6.1 The site has the best possible Public Transport Accessibility Level (PTAL) of 6B (excellent) and is within a controlled parking zone, within 5 minutes' walk from Warren Street tube station and 6 minutes' walk from Euston mainline station and Euston tube station.

Trip Generation

6.2 A Transport Assessment (TA) has been submitted in support of this application. The submitted TA includes details of trip generation analysis from the TRICS trip generation software.

6.3 *Student Accommodation* - The results predict the proposed development would generate 23 trips (2 in, 21 out) in the AM peak and 32 trips (21 in, 11 out) in the PM peak.

6.4 *Office Accommodation* - The results predict the proposed development would generate 26 trips (24 in, 2 out) in the AM peak and 25 trips (2 in, 25 out) in the PM peak.

6.5 The total 12-hour trip generation was also calculated. It was concluded that the proposed development has the potential to generate around 10 additional trips, on average, over a 12-hour period.

6.6 The estimated increase in average 12-hour trip generation was considered negligible and would not have a significant effect on the operation of local transport facilities, including the operation of the local road network, public transport services, pedestrian networks and cycling networks. These conclusions were generally agreed upon with the Council's transport officer, however it is noted that the estimate for the existing office space's trip generation included 1427sqm of Ancillary Office Storage (which would have negligible trip generation), as such, the difference between the existing and proposed uses may be more than suggested (but not enough to warrant amendments or refusal in this instance).

Car Parking

6.7 Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. This would prevent the occupants from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport. To prevent the future occupants from obtaining on-street parking permits from the Council, any development would have to be subject to a car free agreement and this would be secured by means of a Section 106 Agreement if permission were to be granted. As planning permission is being refused, the failure to enter in a Section 106 agreement for a car-free development would form a further reason for refusal.

Cycle parking

6.8 The proposed cycle parking is detailed in Table 3.3 of the TA, reproduced below.

Table 3.3: Proposed Cycle Parking Provisions		
Use	Proposed Number of Spaces	Type and Location
Offices / Affordable Workspace (1,338sqm)	16 Standard Long-Stay Spaces	Two-Tier Racks at Ground Floor Level
	3 Long-Stay Fold Up Cycle Lockers	Ground Floor Level Cycle Store
	1 Long-Stay Accessible Space	Sheffield Stand in Recessed Entrance
	20 Long-Stay Spaces in Total	
	3 Standard Short-Stay Spaces	Sheffield Stands in Recessed Entrance
	3 Short-Stay Spaces in Total	
Student Accommodation (239 Bedspaces)	178 Standard Long-Stay Spaces	Two-Tier Racks at Basement Level accessed via Lift or Stair Ramp
	2 Long-Stay Accessible Spaces	Sheffield Stand in Courtyard at Ground Floor Level
	180 Long-Stay Spaces in Total	
	8 Standard Short-Stay Spaces	Sheffield Stands at Ground Floor Level in Recess Adjacent to Student Access
	8 Short-Stay Spaces in Total	

6.9 The above table gives 200 Long-Stay and 11 Short-Stay Spaces and includes the re-provision of 12 cycle spaces for existing residents. The proposed cycle provision for the uplift exceeds the London Plan standards and is accepted.

6.10 CPG Transport clause 8.11 requires: *Details of all cycle parking and associated facilities must be submitted at the pre-application stage and the full application stage in order for the Council to fully assess the transport implications of the proposals.* It is not clear from the drawings how these requirements are satisfied; however, the applicant has subsequently provided acceptable details of the type and amount of cycle storage. Compliance with the submitted details could be secured by way of condition if permission were to be granted.

6.11 It should be noted that the dimensions of the proposed lifts fall short of the requirements of CPG Transport clause 8.16: *The route to cycle parking from street level must be step free. If level access is unachievable, the cycle parking must be accessible via a ramp or a lift that is adequate in size to accommodate a cycle and its user.*

6.12 The shafts would have internal dimensions of 1.7m x 2.5m. Whilst the internal dimensions of the lift car have not been confirmed they are expected to be at least 1.1m wide x 2.1m deep, which is wide enough and deep enough for a cyclist pushing a bicycle.

6.13 With regards to cycle parking for offices, the proposed office space would not be provided with access to the lifts. The lifts are to be provided as part of the student accommodation uses only. Users of the office space would have access to separate cycle parking facilities which would be located at ground floor level and that would be reserved for staff and visitors associated with the office space only.

6.14 In terms of potential arrival times, given that the students based at the scheme would have varying timetables for lectures and would likely be arriving from different destinations on one or more campuses, there would not be many cyclists arriving at the same time. This is demonstrated by the TRICS data contained within Appendix I of the TA which shows that the number of cycle trips would be low and spread out across the day.

6.15 In conclusion, it is considered that students based at the proposed scheme would be able to access the basement cycle parking facilities by lift. As such, while the 1.1m wide x 2.1m lift does not comply with guidance but is accepted in this instance.

Deliveries and other servicing activities

6.16 The TA has made an estimate of the number of deliveries that would be made on a typical day: 4 deliveries per day for the student accommodation and 2 to 3 deliveries per day for the affordable workspace, giving a total of 6 to 7 deliveries per day. Adjacent to the site, in William Road, there is a section of single yellow line road making about 38m in length. This should be sufficient to cater for the delivery demand of the proposal.

6.17 A draft Delivery and Servicing Plan (DSP) has been submitted with the application and this is welcomed. A DSP would need to be secured by a section 106 agreement if the application were to be approved. As planning permission is being refused, the failure to enter in a Section 106 agreement for a DSP would form a further reason for refusal.

Start and End of Term / Year - Student Accommodation

6.18 The TA refers to a procedure for managing student arrival and departure periods (at the start and end of term). Various measures are given, as quoted below.

"8.9 The move in process would be managed to ensure that not all students arrive at once; this would minimise the impact on the surrounding public highway network."

8.10 The move in process would be spread over two weekends each academic year in order to stagger arrivals. Each student would be advised of a date and time to take up occupancy of their room. Information packs relating to loading arrangements and relevant public transport routes, as well as room location would be distributed to students prior to the start of term.

8.11 During 'move in' days student resident management presence would be increased. Staff would seek to minimise disruption by directing students and associated persons to the relevant unloading locations and to the correct part of the building.

8.12 If students and associated persons choose to ignore these timings the on-site team would reserve the right to refuse access.

8.13 Each student would be required to provide their intended method of transport for move-in day, so that time slots can be allocated to minimise impact on both public transport services, as well as the local highway network.

8.14 The move-out process would be managed in a similar manner; students would be required to provide their intended mode of departure and be allocated a departure time slot. These time slots may be longer than on move-in arrangement as departures would naturally be more spread out with courses finishing at various times.

8.15 Overall, the potential effect of the proposed development at the start and end of term would be negligible / minimised."

6.19 A Student Management Plan has been submitted with the application; however, the measures for managing student arrival and departure are somewhat relaxed when compared to the measures quoted in the TA. The Student Management Plan would need to be amended in line with the TA and the document would need to be covered by a section 106 agreement if the application were to be approved. The applicant has indicated they would agree to amend the Student Management Plan as is necessary.

Highway works contribution

6.20 The carriageway and footway directly adjacent to the site on William Road and Stanhope Street is likely to sustain significant damage because of the proposed demolition and construction works required. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.

6.21 A highways contribution would need to be secured as a section 106 planning obligation if planning permission were to be granted. This would allow the Council to repave the carriageway adjacent to the site, provide new footways along the eastern and western frontage of the building and repair any other damage to the public highway in the general vicinity of the site. The highway works would be implemented by the Council's highways contractor on completion of the development. Unused monies would be returned to the applicant. A cost estimate for the highway works has been provided:

- Reinstating footway –(including 1 skylight) - £50,325
- Reinstating cross over – (including 2 skylights) - £13,310
- Burn off Keep Clear markings - £130
- Assumed new kerbs and ASP flags.

6.22 This is a non-negotiable fee and failure to agree to this obligation would form a further reason for refusal.

Excavation in close proximity to the public highway

6.23 The existing subsurface retaining walls would be reused but would require an appropriate temporary works strategy to ensure ground movements due to construction are within acceptable tolerances. We must ensure that the stability of the public highway adjacent to the site is not compromised by the proposed works. The applicant would be required to submit an 'Approval in Principle' (AiP) report to our Highways Structures & Bridges Team within Engineering Services as a pre-commencement obligation. The template for the AIP is found in the British Standard CG300. The AIP would need to include structural details and calculations to demonstrate that the proposed

development would not affect the stability of the public highway adjacent to the site. The AIP would also need to include an explanation of any mitigation measures which might be required. The AIP and an associated assessment fee of £1584.01 + VAT would need to be secured as a section 106 planning obligation if planning permission were to be granted. As planning permission is being refused, the failure to enter in a Section 106 agreement for an AIP would form a further reason for refusal.

Travel planning

6.24 As detailed previously, there would be many predicted trips associated with the development. A Student Travel Plan and a Framework Commercial Travel Plan have been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport.

6.25 For the student accommodation, a strategic travel plan and associated monitoring and measures contribution of £9,762 should be secured as a section 106 planning obligation if planning permission were granted.

6.26 For the affordable workspace, a Local Level Travel Plan and associated monitoring and measures contribution of £4,881 should be secured as a section 106 planning obligation if planning permission were granted.

6.27 The Travel Plans would encourage students/staff to make walking, cycling and travel by public transport the natural choice for day-to-day trips.

6.28 The applicant has indicated that they do not agree/accept this obligation/fee. This is non-negotiable and failure to agree to this obligation would form a reason for refusal.

Managing and mitigating the impacts of construction

6.29 Construction management plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). The Council's primary concern is public safety, and also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

6.30 A framework CMP has been submitted in support of the planning application. While the information provided in the draft is useful, a more detailed CMP would be required if planning permission were granted. The final CMP would require significant input from Council officers, Transport for London, local residents and other stakeholders before being approved. The Council would seek to secure a CMP, a CMP implementation support contribution of £28,520 and a Construction Impact Bond of £30,000 as section 106 planning obligations in accordance with Policy. This is non-negotiable and failure to agree to this obligation would form a reason for refusal.

Pedestrian, cycling and environmental improvements

6.31 The Council, through its policies and strategies aims to encourage active travel such as walking and cycling as the primary mode of transport for short journeys within the borough and is committed to improving cycling and pedestrian routes in the area, this is particularly relevant in the Euston Plan Area. The Council seeks to secure a Pedestrian, Cycling and Environmental (PC&E) improvements contribution as a section 106 planning obligation for permitted schemes that would have significant impacts and where there are public realm schemes to fund in the vicinity. PC&E contributions (secured from major developments, where relevant) are used by the Council to transform the public realm in the general vicinity of the site for the benefit of cyclists and pedestrians. Any focus in this instance would

be on improving conditions for walking and cycling on routes between the site and key transport interchanges such as Euston where the area is undergoing significant upgrades with HS2, Crossrail 2 and the Euston station upgrades, as well as the wider aspirations with regeneration in the area.

6.32 The proposed development would introduce a significant new student population into the area (239 bedsits) in a central position within the Euston Plan area, in close proximity to Hampstead Road. The Euston Plan seeks to significantly improve the public realm, in particular improvement of east to west links (with William Road notably being a centrally positioned, lateral, east-west oriented road).

6.33 Given the wider strategic context of which the subject site forms part of, the Council would seek to secure an additional contribution for Pedestrian, Cycling and Environmental (PCE) improvements if planning permission is granted. A preliminary estimate of this is £239,000. As planning permission is being refused, the failure to enter in a Section 106 agreement for a PCE contribution would form a further reason for refusal.

Summary and conclusions

Subject to satisfactory resolution of the preceding, the proposals are acceptable in transport terms and as long as the following obligations and conditions are met:

- Car-free development applying to all land uses.
- Delivery and Servicing Management Plan.
- Plan for managing student arrival and departure periods (at the start and end of term).
- Highways contribution (£63,765).
- Approval in Principle (AIP) and associated fee of £1,800 per report.
- Strategic Level Travel plan for the student accommodation and associated monitoring fee of £9,762.
- Local Level Travel plan for the affordable workspace and associated monitoring fee of £4,881.
- Construction management plan (CMP) and CMP implementation support contribution of £28,520.
- Construction Impact Bond of £30,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £239,000.

7.0 Basement

7.1 The Council's Basement policy A5 includes a number of stipulations for proposed basement development within the Borough. These include upper limits to the acceptable proportions of proposed basement extensions in comparison to the original dwelling (paras.(f) – (m)), but also the express requirement for applicants to demonstrate that the excavations/works proposed would not result in harm to:

- a. neighbouring properties;
- b. the structural, ground, or water conditions of the area;
- c. the character and amenity of the area;
- d. the architectural character of the building; and
- e. the significance of heritage assets

7.2 Parts (n) – (u) of this policy continue to expand upon this requirement and together, set the parameters for the assessment of proposed basement development. These parameters are expanded upon with CPG Basements. The Council will only permit basement development where it has been satisfactorily demonstrated that the works would accord with these criterion.

7.3 In accordance with the requirements of policy A5, the applicant has submitted a Basement Impact Assessment (BIA) report which reviews the impacts of the proposed basement structure and construction methods in terms of its impact upon drainage, flooding, groundwater conditions and

structural stability. A firm of consultants using individuals who possess suitable qualifications in line with CPG requirements produced the submitted BIA. Due to the complexities of development constraints for the site, these documents have undergone a full audit from the Council's third party auditors – Campbell Reith (CR). The submitted BIA has been prepared by Card Geotechnics Limited dated November 2020, the authors have the qualifications required by the Council.

7.4 Campbell Reith have assessed the information and issued their final audit of the applicant's submitted BIA and conclude that "The BIA complies with the requirements of Camden's Planning Guidance with respect to basements".

7.5 The BIA is based on desk study information which, considering the proposals, is adequate for impact assessment. Site specific intrusive investigation would be required for the design of the substructure. The BIA notes that the basement is not being extended horizontally or vertically and that the basement walls would be retained and reused. Existing and proposed basement slab levels have been provided and confirm the basement is not being deepened.

7.6 On the basis that the basement is not being deepened and the existing basement walls are being retained, the screening exercise identified no potential impacts to groundwater (including cumulative impacts), surface water and stability. This is accepted. The works would also be subject to control via Approvals in Principle and the Party Wall Act.

7.7 The basement is considered to be acceptable. Compliance with the submitted BIA could be secured by way of a condition if permission were to be granted.

8.0 Sustainability

8.1 The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use of decentralised energy and renewable energy technologies. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. It requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures.

8.2 London Plan Policy SI2 of the London plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013.

8.3 Where the London Plan carbon reduction target cannot be met on-site policy allows for a carbon-offset financial contribution which will be used to secure the delivery of carbon reduction measures elsewhere in the borough.

8.4 London Plan Policy SI2 also states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

8.5 London Plan objective GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the Mayor's aim for London to be a zero-carbon city by 2050. Policy D3 of the London Plan further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy.

8.6 Developments are also expected to implement the sustainable design principles as noted in policy CC2 by achieving a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

Energy

Carbon Reductions

8.7 The proposals meet most of the carbon reduction requirements using up to date SAP10 carbon factors.

8.8 The proposals would achieve an overall 61.9% reduction in carbon emission which exceeds the 35% minimum on site requirement but falls short of the zero carbon requirement and therefore a carbon offset payment of £221,945 would be required. The proposals provide a 46.2% reduction in carbon after all other savings through onsite renewable technology which exceeds the 20% requirement. The proposals achieve a 29.2% reduction in carbon through energy efficiency which exceeds the 15% target in the London Plan 2021.

Be Green/ Renewables

8.9 The GLA at stage 1 consultation raised the following concerns in relation to energy:

- *"The applicant should note that the London Plan (2021) includes a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency which applicants will be expected to meet. The applicant should therefore model additional energy efficiency measures to meet the energy efficiency target. The hot water demand is high, and the applicant should consider the potential for wastewater heat recovery.*
- *The applicant is proposing a Combined Heat and Power system; however, given the scale and nature of the development this is not acceptable, as set out in Policy SI3. Alternative low carbon heating methods should be investigated and the currently proposed strategy should be revised.*
- *The GLA expects all major development proposals to maximise on-site renewable energy generation, where feasible. The applicant is, therefore, required to reinvestigate the inclusion of PV and they should provide a detailed roof layout to demonstrate that PV has been maximised and demonstrate any constraints.*
- *Further information in relation to energy costs, minimising overheating risk, demonstrating potential for connection to a DHN and the proposed Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. Detailed comments in relation to the required additional information have been provided separately to the Council."*

8.10 These concerns raised by the GLA above, are shared by the Council. It is acknowledged that the applicant has engaged in collaborative discussion to provide additional information and revisions in respect to; non-domestic carbon savings, energy efficiency, the proposed energy centre, photovoltaic panels, district heat networks and air source heat pumps, however concerns still remain and it is not considered that the issues raised have been fully addressed at application stage.

8.11 The proposals are for a well-insulated building with Air Source Heat Pumps for central hot water, VRF for heating and cooling amenity spaces, electric panel heaters and MVHR for ventilation. The direct electric heating has not been justified and is a cause for concern. The GLA Energy Assessment Guidance states "Direct electric heating will not be accepted in the majority of cases as it will not provide any on-site carbon savings in line with the energy hierarchy and it is likely to result in higher energy bills. Direct electric systems are also not compatible with connection to district heating networks." Therefore whilst the hot water system would have potential to connect to a district heating

network the heating would not. No information on the costs to the residents of the proposed direct electric heating system have been provided. There are no proposals for Solar PV to be combined with the proposed green roof areas. Full details of the PV panels and green roofs, including detailed roof plans and a scheme of maintenance would be secured by condition if the proposals were considered acceptable in all other regards.

Monitoring

8.12 Energy monitoring is required to meet Policy SI 2 of the London Plan. This could be secured by way of a condition if the proposal were to be acceptable. Draft wording is below:

- In the event that the in-use evidence submitted shows that the as-built performance estimates have not been or are not being met, the legal Owner should use reasonable endeavours to investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'be seen' spreadsheet. Where measures are identified, which it would be reasonably practicable to implement, an action plan comprising such measures should be prepared and agreed with the Local Planning Authority. The measures approved by the Local Planning Authority should be implemented by the legal Owner as soon as reasonably practicable.

Resource Efficiency and Demolition

8.13 Policy CC1 criterion e) requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. This is supported in the following paragraphs (8.15, 8.16 and 8.17 of the Local Plan 2017) which state the following:

- *Given the significant contribution existing buildings make to Camden's CO2 emissions, the Council will support proposals that seek to sensitively improve the energy efficiency of existing buildings.*
- *The construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed. Many historic buildings display qualities that are environmentally sustainable and have directly contributed to their survival, for example the use of durable, natural, locally sourced materials, 'soft' construction methods, good room proportions, natural light and ventilation and ease of alteration.*
- *All proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Where the demolition of a building cannot be avoided, we will expect developments to divert 85% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. We will also require developments to consider the specification of materials and construction processes with low embodied carbon content.*

8.14 Contrary to the above, the applicant has not carried out a feasibility study to test whether retaining and improving the existing building is more sustainable than demolishing and rebuilding. This should first be considered before attempting to justify demolition and redevelopment through other means. The proposal fails to comply with the requirements set out in Policy CC1 and the supporting texts.

Whole Life-Cycle Carbon and Circular Economy

8.15 The GLA at stage 1 consultation raised the following concerns with regards to Circular Economy and Whole Life-Cycle Carbon:

- *“London Plan objective GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the Mayor’s aim for London to be a zero-carbon city by 2050. Policy D3 of the London Plan further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy.*
- *As such, and in line with London Plan Policy SI7, a Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste. The pre-consultation draft of the Circular Economy Statements Guidance (March 2020) provides further information on how to prepare a Circular Economy Statement and is available on the GLA website.*
- *London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. A Whole Life-Cycle Carbon template (produced by the GLA) should be completed in accordance with the assessment guidance. The applicant should use these tools as the design progresses to calculate and reduce WLC emissions against the GLA’s benchmarks provided in the guidance. The assessment guidance and template are available on the GLA website. The WLC Assessment must be provided prior to Stage 2.”*

8.16 A Whole Life-Cycle Carbon assessment is required in line with policy SI2 of the London Plan 2021, to provide justification for substantial demolition.

8.17 A Circular Economy Statement is required, in line with Policy SI7 of the London Plan 2021, to demonstrate how the proposals promote circular economy outcomes and to set out how the proposals will meet or exceed the targets for 95 per cent reuse/recycling/recovery of construction and demolition waste and ensure 95 per cent of excavation is put to beneficial use.

8.18 The applicant has failed to submit a Whole Life-Cycle Carbon (WLC) assessment or a circular economy statement, which are required by London Plan Policies SI2 and SI7 and Local Plan Policy CC1. The conclusions of these reports help inform good design and therefore the Council would require these to be provided at application stage (as opposed to being provided as a condition of approval). Without the submission of this information, it has not been demonstrated that the proposed substantial demolition is justified or that the proposal would promote circular economy outcomes contrary to policy CC1 of the Local Plan 2017 and policies SI2 and SI7 of the London Plan 2021, and as such, forms a reason for refusal.

Sustainability

8.19 The BREEAM pre assessments indicate the proposals would achieve an overall rating of Excellent (82%) rating and 66% for Energy, 66% for Water and 50% for Materials which would meet the minimum unweighted credit section requirements of 60% for energy and water and 40% for materials.

Cooling

8.20 Overheating potential has been assessed the proposals are reported to meet the thermal comfort criteria for predominantly naturally ventilated buildings. As such no active cooling should be required.

Water Efficiency

8.21 The design is targeting 125l/p/d for water efficiency which does not meet the required target of 105l/p/d plus 5l/p/d for external use. Further as a high water use development greywater and rainwater harvesting should be included. A commitment has been made to undertake a rainwater/greywater recycling feasibility study prior to commencement. This could be secured by way of conditions if the proposal were to be acceptable.

Conclusion

8.22 Without a feasibility study demonstrating that retention of the existing building would not be possible; and without the submission of a WLC assessment and circular economy statement, it has not been demonstrated that the proposed substantial demolition is justified or that the proposal would promote circular economy outcomes contrary to policy CC1 of the Local Plan 2017 and policies SI2 and SI7 of the London Plan 2021, and as such, forms a reason for refusal.

8.13 It is considered that a section 106 legal agreement would be required to secure a carbon off-set contribution; an Energy Efficiency Plan and Renewable Energy Plan including the measures set out in the Energy Strategy; details regarding the feasibility of connecting to a decentralised energy network; and a Sustainability Plan including Design Stage and Post Construction stage BREEAM assessment reports and certificates, demonstrating compliance with targets. In this absence of a legal agreement, this forms a reason for refusal.

9.0 Flood Risk and Drainage

9.1 Policy CC3 states that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. The Council will require development to:

- a. incorporate water efficiency measures;
- b. avoid harm to the water environment and improve water quality;
- c. consider the impact of development in areas at risk of flooding (including drainage);
- d. incorporate flood resilient measures in areas prone to flooding;
- e. utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
- f. not locate vulnerable development in flood-prone areas.

Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

9.2 The proposal is not situated in a Local Flood Risk Zone or a previously flooded street but are within a critical drainage area (group 3_003) . The proposed SuDs (sustainable drainage) measures include rainwater harvesting (3m³), 74m² of green roofs and 351m² of blue roof (providing 38m³ attenuation) plus 19m³ of attenuation tanks. This should provide adequate storage to achieve greenfield run off rates for up to 1:100 plus 40% for climate change and meet the policy requirements. If permission were to be granted a condition would be attached ensuring that the sustainable drainage systems are installed in accordance with the submitted details.

10.0 Air Quality

10.1 Policy CC4 requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality.

10.2 The proposal is situated in an area of poor air quality. The development is Air Quality Neutral and will generally not contribute to the poor air quality in the area. No emergency generators or gas boilers are proposed. Life safety power supply would be either by separate power connection or by uninterruptable power supply (a battery). The appropriate mitigation for a high risk construction dust site proposed. A condition could secure such measures if the proposal were acceptable.

10.3 The Air Quality Assessment which has been submitted does not model the air quality at the site in line with the requirements as set out in the CPG Air Quality. Specifically for DEFRA background or local measured background monitoring should be used (whichever is higher). The local measured background concentrations which have been used in the assessment are lower than DEFRA

background figures. Regardless of this, the results using the local measured background modelling still indicate that standards, specifically WHO standards for Particulate Matter, are exceeded at units over first floor level. As such there are concerns about the impact of the local air quality on the occupants.

10.4 Whilst there are no residential units at ground floor level there are no other mitigating measures proposed. No information has been provided to respond to the issue raised of the need for further design solutions and provision to address local problems of air quality, as is required in the London Plan. Therefore, there is insufficient information to confirm that the proposals comply with the WHO standards or the requirements of London Plan Policy SI B 1) c) to not create an unacceptable risk of high levels of exposure to poor air quality. On this basis, in line with Policy SI B 2) b), the development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air pollution, or mitigation required. Occupiers should be advised of health risks from poor air quality at the site if the proposals are approved. Conditions and informatives could however be attached to overcome the above issues if the proposal were acceptable.

11.0 Safety and Security

Design out crime

11.1 The Metropolitan Police 'Designing Out Crime' Officer confirmed that they did not object to the development of the building, but had a number of recommendations to reduce crime and the fear of crime following meeting with the applicant.

- Main entrance – As the primary entry and exit into the building this will be required to have some kind of 'Access Control' for residents, preferably in the form of an encrypted FOB to prevent copying or cloning if either lost or stolen. They also assist with managing the location, with restricting access and movement throughout the entire building to those who require it. A visitor should be able to call the reception desk and then be allowed to wait in the main communal area to be collected by a resident. The reception desk is positioned in a location which offers good natural surveillance of the main entrance. The accessible entrance should be managed exactly the same as the main primary entrance.
- The door leading off this communal area into the lift and stair core should also be fitted with 'Access Control', including access into the stair core itself and with destination control on the lifts to ensure if someone is unlawfully inside the building they will be restricted to limited areas if they are undetected. As the central core splits the residential units then there is an opportunity to control 'Access and Movement' into both the east and west wing of the residential area. This compartmentalisation of the building is essential and is recommended by 'Secured by Design' for any residential development which has over 25 units. It is recommended that this 'Access Control' system also have the ability to have 'Data Logging' so any misuse can be accurately recorded to identify individuals or assist with pinpointing times/dates with the proposed CCTV.
- All residential doors should have the following dimensions – Door rails, stiles and muntins should be at least 44mm thick. After rebating, frame components should retain at least 32mm of timber. Any panel within the door should be at least 15mm thick. The panel should be securely held in place, beading mechanically fixed and glue in position, the dimension of the panel height/width should be no more than 230mm or less. The use of either a multipoint locking system PAS 8621:2011 (non-key locking on the internal face) or an alternative would be to have BS 8621:2017 mortice lock positioned one third up the lock stile combined with a surface mounted rim lock conforming to the same standard. These primary door sets shall also be installed with hinge bolts or specialist interlocking hinges. A door chain or opening limiter meeting TS 003 must be installed to this door set to which a caller can be expected. A door viewer meeting TS 002 must be fitted also. It is suggested that on the units, which are shared by two occupants, the physical security locks are installed but there is no need for the limiters or door viewers.

- Cycle Storage –the main entrance into the cycle storage from ground level will be from William Road and this will also be an alternative entrance into the main building. This is where the 'Encrypted' FOB access will be beneficial as it is recommended that only residents who require this access can be given authority to use this entrance. The door to the cycle storage itself should be security rated to PAS24:2016 or STS 201 Issue 7:2015, LPS 1175 SR2 or B3, STS 202 Issue 6:2015 BR2 or LPS 2081 Issue 1.1:2016 Security Rating B. The cycle racks themselves should be secured to the ground with tamper proof fixings and also allow the cycle to be secured with three points of locking (both wheels and the frame). As these areas can be extremely vulnerable to theft it is recommended that both the external door and the cycle door have a minimum of two magnetic locks positioned one third from the top and bottom of the frame with a minimum pull weight of 600kg each.
- Postal Strategy – A central location within the main reception area and which can be accessed by residents or by a management strategy which allows all items to be safe and secure. If utilising post boxes then the letter plate should meet TS 008 to reduce theft of the mail or even identify theft.
- External Spaces on top floor – The ability to control when these spaces can be used should be considered to prevent any misuse during the hours of darkness for instance. Once again encrypted access control will be beneficial in conjunction with CCTV.
- Lighting/Landscaping – The planting of trees outside of the proposed building has been noted so consideration to how they will interact with any existing street lighting must be taken, they also should not impede the opportunity for natural surveillance and way finding. This is to ensure that any benefits this lighting provides is not lost with heavy tree canopies. Ideally they should be planted five metres or more away from any light column.
- Seating –concerns about the proposed seating in the recessed main entrance covered area. This may encourage loitering and anti-social behaviour from non-residents and will be difficult to manage. The space is intended to be 'private', but by adding seats it will appear to be 'public' and therefore this ambiguity can lead to issues to staff wishing to challenge any loitering or ASB. It is recommended this is removed from this location.
- CCTV – In conjunction with physical
- Contact the 'Universities Liaison Team' for Camden once in operation as they will be able to provide help and support for students, advice on crime prevention and making them aware of the local area and the specific crime problems will ensure any new resident does not become a victim of crime.

11.2 No revised drawings or supporting documents were received addressing the above comments. It is however considered that a number of the recommended measures could be secured by way of conditions if the proposal were to be acceptable. As such, refusal on these grounds is not warranted.

Fire safety

11.3 In line with London Plan Policy D12, development proposals must achieve the highest standards of fire safety and demonstrate how they would achieve this including details of construction methods and materials, means of escape, fire safety features, and means of access for fire service personnel. Additionally, Policy D5 seeks to ensure that all developments provide for a safe and dignified emergency evacuation for all users. To this end, in all developments where lifts are installed at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift to be used to evacuate people who require level access from buildings.

11.4 Concern is raised with the proposal for a single stair core in a building which is significantly over 18 metres in height. Fire safety is an important issue and designs may be compromised by changes in

regulations in the future. This has yet to be reviewed by as part of the building control procedure and this process may result in the need for substantial internal layout changes.

11.5 A fire statement has been submitted which appears to meet the necessary requirements. Compliance with the submitted fire safety statement and review by the relevant consultees could be secured by way of condition if the proposal were to be acceptable.

12.0 Land Contamination

12.1 The site is identified as having the potential for ground contamination. A Desk Study Report has been submitted which has been assessed by the Council's Environmental Health Officer. The preliminary risk assessment established there are no significant sources of contamination due to historical land use activities at or neighbouring the site.

12.2 The Council's Environmental Health Officer identified some concerns regarding potential unexploded ordinance and radon exposure; however, overall there is no objection in principle to the development subject to conditions. If the development were to be approved, a condition would be added to secure a radon and vapour investigation (incorporating a detailed assessment of the risks to all receptors that may be affected) is undertaken and a ground gas and vapour assessment report (GVAR). It would also be recommended that an UXO assessment is undertaken and provided to the main contractor, along with a copy of the Desk Study so that the appropriate controls can be implemented to reduce human health risks to acceptable levels, as required by the Construction (Design & Management) Regs 2015.

13.0 Microclimate (wind)

13.1 Policy A1 states, with regard to Microclimate, that large developments can alter the local climate. Buildings can affect the flow of air and cause wind tunnels which can potentially affect the enjoyment of public spaces. A building's colour can affect how much heat it absorbs and therefore impact upon local air temperatures. Developments should therefore consider local topography and the local microclimate in their design. Developments large enough to alter the local climate will be required to submit a statement demonstrating how the design has considered local conditions.

13.2 A wind assessment has been submitted prepared by Thornton Tomasetti, a qualified wind engineering firm. The result of the assessment are generally acceptable. Minor issues have been raised but could be potentially be overcome by way of conditions if the proposal were to be acceptable.

14.0 Employment and training opportunities

14.1 In spite of the offer around affordable workspace, the development would still result in a net loss of employment floorspace. In respect of this, the Council would expect to secure a strong package of employment and training opportunities through a s106 legal agreement to ensure that local people were able to benefit during the construction phase of the scheme, and from any affordable workspace provided. These include:

Construction Phase

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per section 68 of the Employment sites and business premises CPG
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 70 of the Employment sites and business premises CPG.

- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction apprentice paid at least London Living Wage per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per section 65 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Inclusive Economy team.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 71 of the Employment sites and business premises CPG; and
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site, as per section 63 of the Employment sites and business premises CPG.

End Use Phase

- Provision of 1x end use apprenticeships paying at least London Living Wage. The apprenticeships could be within a range of roles (examples include hospitality, business administration, finance, customer service, IT)

14.2 As the employment floorspace lost is more than 500 sq m, there would also be a requirement to provide an employment and training contribution, to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden, in accordance with section 73 of the Employment sites and business premises CPG. Such a contribution would be secured by S106 legal agreement.

14.4 In the absence of an acceptable scheme (and hence no section 106 agreement securing an Employment and Training plan or contribution) this becomes a reason for refusal.

15.0 Refuse and Recycling

15.1 Camden Local Plan policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.

15.2 Large dedicated bin storage areas are proposed at ground floor level which are easily accessible for collection. It is considered that the areas proposed are sufficient for the intended use.

15.3 If the proposals were considered acceptable in all other regards, a condition would secure details of the waste management plan to ensure the waste is managed and brought onto street for collection and returned back to the allocated storage room.

16.0 S106 Obligations

16.1 If the proposal was considered to be acceptable it would be the subject of a S106 legal agreement. Many of the obligations required have been discussed above and are included as reasons for refusal. Below is a summary of the heads of terms that would be sought for a successful scheme:

- Car-free development applying to all land uses.
- Delivery and Servicing Management Plan.
- Plan for managing student arrival and departure periods (at the start and end of term).
- Highways contribution of £63,765).
- Approval in Principle (AIP) and associated fee of £1,800 per report.
- Strategic Level Travel plan for the student accommodation and associated monitoring fee of £9,762.
- Local Level Travel plan for the affordable workspace and associated monitoring fee of £4,881.

- Construction/demolition management plan (CMP) and CMP implementation support contribution of £28,520.
- Construction Impact Bond of £30,000.
- Pedestrian, Cycling and Environmental Improvements contribution of £239,000.
- Level Plans.
- Student management plan.
- Securing term-time occupation by HE students at publicly funded education institutions in Camden or adjoining boroughs – or other specified publicly-funded education institutions agreed by the Council to be easily accessible from the development by foot, cycle or public transport.
- Ensuring accommodation is let to eligible students for the full duration of all terms in the academic year, and in any event not for less than a single term.
- Ensuring all accommodation is managed as a single planning unit and individual parts are not disposed of as independent self-contained homes
- Affordable student housing (35% or maximum viable if less than 35%), with nominations agreement with eligible education institution to be entered into prior to first occupation.
- Where non-student occupation is agreed outside term times, specification of the type and extent/ duration of non-student use, prevent non-student occupation at other times, and ensure that students are able to let either for the full year or for term-time only at equivalent weekly rents, and a non-student management plan.
- Employment and training contribution of £48,171.90.
- Employment plan including apprentices and a support fee.
- Carbon offset payment of £221,945.
- BREEAM 'Excellent' for the non-residential space (with minimum sub-targets for Energy, Water and Materials).
- Energy efficiency and renewable energy plan (including a Combined Heat and Power (CHP).
- Feasibility study for connecting a decentralised energy network (DEN).
- Public open space PIL of £310,350
- Retention of architects.

17.0 Community Infrastructure Levy (CIL)

17.1 If the proposal was deemed acceptable it would be liable for both Mayoral and Camden CIL. The CIL form submitted with the application indicates that the development would have an uplift of 4,287sqm GIA. Based on the Mayor's CIL2 and Camden's CIL charging schedules and the information submitted the charges would be approximately £2,753,968.

Mayor CIL2

Student accommodation - £80 sqm

Office - £180 sqm

Camden

Student accommodation - £225 sqm

Office - £110 sqm

- Borough CIL: £2,464,129.27
- Mayoral CIL: £289,838.92
- **Total CIL: £2,753,968.19**

17.2 The above is an estimate only and would be subject to the verification of the proposed floor area and calculations by the Council's CIL team.

18.0 Conclusion

18.1 In conclusion, the proposed development, due to the loss of employment space; excessive height, mass, scale and footprint; and provision of substandard accommodation would be detrimental to

economic growth; the character and appearance of the surrounding area and setting of nearby listed buildings; and the amenities of neighbouring occupiers and future occupiers of the subject site.

18.2 As such, it is recommended the application is refused.

Appendix 1 (DRP Report):



FRAME PROJECTS

London Borough of Camden Design Review Panel

Report of Formal Review Meeting: 17-37 William Road

Friday 25 September 2020
Video conference

Panel

Catherine Burd (chair)
Harriet Bourne
Ian Chalk
John McRae
Matthew Lloyd

Attendees

Kevin Fisher	London Borough of Camden
Ben Farrant	London Borough of Camden
Lavinia Scaletti	London Borough of Camden
Angela McIntyre	Frame Projects
Kiki Ageridou	Frame Projects

Apologies / report copied to

Bethany Cullen	London Borough of Camden
Richard Wilson	London Borough of Camden
Edward Jarvis	London Borough of Camden
Deborah Denner	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Camden Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

1. Project name and site address

William Road , 35-37 William Road and 17-33 William Road, London, NW1 3ER

2. Presenting team

Peter Moore	MBU Capital
Joe Morris	Morris + Company
Miranda MacLaren	Morris + Company
Tania Marques	Morris + Company
Ben Myres	Morris + Company
Jack McFarlane	Morris + Company
David Shiels	DP9
Oliver Sheppard	DP9
Louise Newman	Tavernor Consultancy

3. Planning authority briefing

The site is located on the corner of William Road and Stanhope Street and comprises of two parts – a seven storey block at 17-33 William Road (Plot B) and a part six, part two storey building at 35-37 William Road (Plot A). The building is linked at ground floor level to 17-33 William Road.

The area is predominantly residential in character. Buildings to the south of Drummond Street tend to be taller and more commercial in scale. However north of Drummond Street where this site is located, the street character changes and is more domestic. There is a mix of building heights in this area, varying from two to eight storeys, with the majority around four storeys.

The site is located in the central London area and within the Euston Area Plan area. It is also within two London View Management Framework viewing corridors.

Plot B is proposed to be refurbished with the introduction of affordable workspace to the ground floor and changes in the façade. Plot A involves the demolition of an existing office and construction of a student housing block.

The panel's views were requested on: height and massing; whether this location is right for a landmark building; what impact this height might have on the pedestrian experience and viewing corridors. Officers also asked the panel to comment on the level of communal amenity space provided for the occupants of the building, and the building's architecture and materiality.

4. Design Review Panel's views

Summary

The design review panel commends the analysis, generation of ideas and design quality coming forward as part of the proposals. However, it considers that the proposed brief is too challenging, forcing a scheme that results in significant overdevelopment of the site, one that puts viability before city making. It considers the proposals are over scaled in bulk and height and mix two confused building typologies. The panel encourages careful thought around whether the building is a stand-alone tower in open space, or a piece of street in the form of a reimagined warehouse / mansion block. In either case, massing must be refined to ensure the scheme respects both the streetscape and the skyline. The panel commends the quality of architectural expression, particularly the sculpted entrance to the student accommodation on William Road. While the proposed student rooms appear to be high quality the panel would like to see a long term operator in place to ensure this quality is delivered. The use of a single stair requires careful consideration to ensure it is a sustainable approach that ensures the building is futureproofed. The panel is concerned with the lack of outdoor amenity space proposed and would like to see more of this provided. While internal amenity space is welcomed, the function and quality of this should be thoroughly scrutinised, and should contribute to the sense of community within the building. These points are expanded below.

Scale and massing

- The panel finds the proposals to be over scaled for this location and site.
- It considers that the building's massing combines two confused typologies – the design team should carefully consider whether the building is a tower or a warehouse / mansion block.
- If the proposal is a continuation of street, expressed as a warehouse / mansion block, there is justification for its massing to spread to the edges of the site, but its height must be reduced to around eight stories to sit comfortably in its context.
- Alternatively, if the proposal is a tower, the panel suggest this should be much more slender with much more open space at ground level, set away from the corner of Stanhope Street and William Road.
- If a tower option is pursued (and the panel is not convinced this is necessarily the correct approach) it would be unacceptable for proposals to be any taller than currently proposed. Changes would need to be made to the building's proportions, with a significant reduction in mass elsewhere, for the proposed height to be potentially acceptable.
- The panel notes other towers referenced in the locality are much more slender in their proportions.
- The shoulder of the warehouse / mansion block sits above the datum created by the existing context, and careful thought is needed to resolve this relationship.

- The panel does not consider long views are the primary issue for this scheme: it considers local 'streetscape' and 'skyscape' views to be more important. It encourages the design team to think carefully about the impact of the scheme's bulk on these views and the public realm.
- Proposed massing should be tested to establish the effect on factors such as daylight and sunlight and neighbouring buildings.
- While the panel enjoys the use of chamfering at the corner, this appears to exaggerate the building's width and bulk in some views.

Architectural expression

- The panel commends the quality of architectural expression proposed in a context where it is difficult to pin down a particular architectural style.
- The proposed materiality is well considered, and the panel feels assured that once the bulk and massing has been refined the proposals could be of an exemplary quality.
- The panel particularly enjoys the sculpted entrance to the student accommodation on William Road.
- It considers that the chamfer to the building's corner on Stanhope Street and William Road should carry on through the proposal's ground floor.

Internal arrangement

- In principle the internal views shown of student accommodation appear of high quality. However, the panel questions how to ensure the quality aspiration is secured and delivered if a long term operator is not in place.
- The panel considers it unlikely that residents of the 'twodios' will leave the window between their bedroom and the kitchen unobscured, this will lead to loss of natural light in the shared kitchen space and have a negative effect on its quality.
- The panel is concerned with the proposal for a single stair core in a building which is significantly over 18 metres in height. Fire safety is an important issue and designs may be compromised by changes in regulations in the future.
- Futureproofing and sustainability should be carefully considered. For example, how feasible it may be to convert the building for another use.
- The panel would like a clearer understanding of how the building is serviced and how plant proposed as roof level is screened.

Amenity space

- In the panel's view the building gives very little back to the public realm at street level.
- It would like to see the inclusion of street trees along the wide pavements on Stanhope Street.
- The panel query the impact that this proposed increase in student population will have on the residential quality and amenities of the local area.
- The panel is concerned about the minimal quantity of external amenity space proposed for 239 student rooms, and the potential effect of this on student quality of life.
- It highlights that in the immediate surroundings of the site there is little amenity space for students to use, and so in its view the building must provide more outdoor space specifically for its residents.
- While the panel welcomes the inclusion of internal amenity space it would like to see this carefully scrutinised to ensure it will be successful.
- It emphasises the importance of having enjoyable shared social spaces which will give the building a social dynamic and sense of community, currently missing from proposals.
- Thought should be given to spaces for chance interactions and for residents to meet their neighbours.

Sustainability

- While the panel is encouraged that the building aims to achieve BREEAM excellent, it notes that a broader sustainability strategy should be set out in the planning submission.
- It would like to see careful consideration of embodied carbon, especially as an existing building is being replaced with a new build. Consideration should also be given to construction techniques proposed.

Next steps

The panel would welcome the opportunity to review proposals at a further review once revised in response to the comments above.

planning report 2020/6844/S1

8 March 2021

17-37 William Road

in the London Borough of Camden

planning application no. 2020/5473/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment to deliver a 15 storey (plus basement) building to provide 239 student bed spaces together with commercial floorspace at ground floor level and associated works.

The applicant

The applicant is **Euston One Limited**, and the architect is **Morris + Company**.

Strategic issues

Principle of development: The principle of student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace complies with Policies E1, H15 and H16, subject to securing student accommodation and affordable workspace (paragraphs 14-23).

Student accommodation: 35% of the student bedrooms would be affordable, in line with the Publication London Plan and Fast Track Route criteria. A S106 obligation to enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured (paragraphs 24-27).

Urban design and Heritage: The layout, design, public realm, and architectural quality of the scheme is supported. The site is not identified in Camden's Local Plan as suitable for tall buildings. Having regard to the townscape assessment, the height of the proposed development can be supported. No harm is identified to nearby heritage assets (paragraphs 28-60).

Sustainable Development: CHP is not supported, and the wider heating strategy should be revised. Further information relating to energy efficiency, energy costs, overheating, potential for a DHN connection and the Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes and the associated carbon offset payment. Further information is sought on flood risk. A Circular Economy Statement should be submitted (paragraphs 61-73).

Transport: The proposed car free residential-led development is supported in principle. Disabled persons car parking provision should be confirmed. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided (paragraphs 74-88).

Recommendation

That Camden Council be advised that, whilst the proposal is supported in principle, the application does not currently comply with the London Plan and Publication London Plan, for the reasons set out in paragraph 92 of this report.

Context

1 On 27 November 2020 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Category of the Schedule to the Order 2008:

- 1C(c) *"building is more than 30 metres high and is outside the City of London."*

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA's website ([link here](#))¹.

Site description

5 The site constitutes a parcel of approximately 0.2 hectares of land bound by William Road to the north, Stanhope Street to the west, four storey commercial development to the east, and a mixture of three and four storey residential buildings to the south. The application site is divided into two development plots. Plot A, on the corner of William Street and Stanhope Street, is presently occupied by a mid-20th century vacant office building (B1 use) ranging two to six storeys in height. Plot B, on the eastern portion of the site, is presently occupied by an early 21st century building of seven storeys in height. The building on Plot B presently contains unoccupied office floorspace at ground floor (B1 use), and residential flats (C3 use) on upper floors. All of this housing is currently affordable. The site is within the Central Activities Zone, Central London Area, and Euston Opportunity Area.

6 The development site is bound by Stanhope Street to the west and A295 William Road to the north, both part of Camden's highway network. The A400 Hampstead Road which forms part of the Transport for London Road Network (TLRN) is 70 metres to the east. The nearest section of the Strategic Road Network is the A400 Tottenham Court Road, approximately 250 metres south.

7 The site has a highest Public Transport Access Level (PTAL) rating of 6b, which is excellent. The site is within walking distance of Regents Park, Euston Square, Warren Street and Euston which provide access to London Underground, London Overground and National Rail services. 3 bus stops within 500m of the site provide access to 13 bus routes.

¹ <https://gla.force.com/pr/s/>

8 The site itself does not contain any designated heritage assets; however, there are heritage assets in the vicinity, including the Grade I listed Regent's Park; Grade II listed 48-52 Stanhope Street, 190-204 (even) North Gower Street and St Mary Magdalene Church and School Annex; and locally listed 184 to 192 Drummond Street, 40-46 Stanhope Street and 7-15 William Road. The site also sits outside but in the vicinity of the Camden Conservation Area. Additionally, the site lies within two protected views as identified in the London View Management Framework (LVMF): the background wider setting consultation area of view 5A.2 from Greenwich Park to St. Paul's Cathedral and the landmark viewing corridor of view 2A.2 from Parliament Hill Summit looking toward the Palace of Westminster.

Details of the proposal

9 The proposed development seeks to demolish the existing building on Plot A and convert the ground floor of Plot B to provide a new building ranging in height up to 15 storeys providing:

- 1,255 sqm of affordable workspace;
- Student accommodation (239 student bed spaces) on the upper floors of Plot A;
- Public realm improvements to William Road and Stanhope Street; and
- Retention of existing affordable homes on upper floors of Plot B.

Case history

10 A pre-application meeting was held with the GLA on 5 May 2020. GLA officers advised that the principle of redeveloping the site with a mixed-use scheme delivering student accommodation and commercial space is supported in the Central Activities Zone (CAZ) and Euston Opportunity Area. Officers sought justification for any loss of office floorspace in the CAZ and that the applicant should ensure that the issues raised regarding affordable housing, urban design, heritage, sustainability, and transport be fully addressed prior to the submission of any planning application.

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Camden Local Plan 2017 and the London Plan (2021).

12 The following are relevant material considerations:

- National Planning Policy Framework (2019) and National Planning Practice Guidance; and
- Euston Area Plan (2015).

13 The relevant strategic issues and corresponding policies are as follows:

- | | |
|---------------------------|--|
| • Land use principles | <i>London Plan</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG;</i> |
| • CAZ | <i>London Plan;</i> |
| • Opportunity Areas | <i>London Plan;</i> |
| • Urban design | <i>London Plan; Character and Context SPG;</i> |
| • Heritage | <i>London Plan;</i> |
| • Inclusive access | <i>London Plan; Accessible London SPG;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy.</i> |

Principle of development

Office and employment use

14 Policy E1 of the London Plan (2021) seeks improvements to the quality, flexibility and adaptability of office space at varying sizes within the Central Activities Zone, alongside increases to the overall quantum of available office stock.

15 The existing application site presently provides 3,693 sq.m. of commercial floorspace, of which 2,266 sq.m is office accommodation and 1,427 sq.m is basement level ancillary and storage space, although it is noted that the office floorspace is presently unoccupied and has been since 2018. By contrast, the proposed scheme would deliver 1,255 sq.m. of new flexible office (B1) floorspace, which represents a net loss of 2,438 sq.m. of total commercial floorspace (1,011 sq.m of office accommodation) compared with the existing situation.

16 Notwithstanding the broad policy objectives to increase the provision of office floorspace within the Central Activities Zone; Policy E1(l) of the London Plan provides scope for the redevelopment, intensification and change of use of surplus office space to other uses (including housing), subject to consideration of the need for a range of suitable workspace including small units, flexible and affordable work spaces. In this respect, it is noted that all of the proposed 1,255 sq.m. of new office floorspace is proposed to be 'affordable workspace' and would include a range of flexible and divisible units suitable for a range of tenants including Small and Medium Enterprises (SMEs).

17 The office floorspace has been vacant since 2018 and unsuccessfully marketed since 2019, as set out in the supporting Marketing and Demand report. The site is deemed an undesirable location given its poor quality and the abundance of available office space of differing quality and size in the immediate vicinity and the wider CAZ area. The site is deemed no longer required by the market and as such, it is accepted that there is no reasonable prospect of the office building being used for business purposes.

18 The development would introduce 1,255 sq.m of affordable employment floorspace in Class B1 use which would be provided as managed workspace or incubator space suitable and flexibly designed for start-up and small and medium sized businesses. The details of the affordable workspace offer in terms of rental discount, management and timescale should be clarified and secured via Section 106 agreement.

19 The office accommodation proposed within the scheme complies with the strategic planning policies and objectives relating to the CAZ, opportunity areas, office floorspace and affordable and SME workspace as set out in the London Plan and would make a positive contribution towards the local employment offer and the objectives of the Euston Area Plan.

Student accommodation

20 Policy H15 of the London Plan (2021) requires Councils to ensure that local and strategic need for purpose-built student accommodation (PBSA) is addressed. Paragraph 4.15.5 of the London Plan, in support of Policy H15, stipulates that in order to be considered Purpose Built Student Accommodation (PBSA), student accommodation must either be operated directly by a higher education provider or have a nomination agreement with one or more higher education providers in place from initial occupation (and secured for the duration of occupation for this purpose). Policy H15 further states that PBSA should be developed in locations that are well connected local services by walking, cycling and public transport and should contribute to a mixed and inclusive neighbourhood.

21 The site is highly accessible, owing to its location within the CAZ, being within walking distance of a number of higher education institutions including University College London, SOAS, University of Westminster, Birkbeck University and the Royal Academy of Dramatic Art and the proposals have been informed by the requirements of the intended student accommodations operator with whom the applicant is in discussions.

22 The applicant proposes to restrict the occupation of the student accommodation to full-time students from local higher education institutions only through a s106 planning obligation. As per paragraph 4.15.5 of the London Plan, failure to demonstrate that the accommodation has been secured for use by students and secured through a nomination agreement with a higher education provider would result in the development being assessed under Policy H16 of the London Plan on large-scale purpose-built shared living. Proposals for large-scale purpose-built shared living will need to make an affordable housing contribution in the form of a payment in lieu. Affordable housing is discussed in further detail below.

Conclusion – Principle of development

23 In summary, the principle of the mixed-use redevelopment of the site to provide student accommodation, and affordable workspace is acceptable in accordance with Policies E1, H15 and H16, subject to the proposed affordable workspace and student accommodation being appropriately secured.

Student accommodation

24 London Plan Policy H15 specifies that purpose-built student accommodation schemes, which provide a minimum 35% affordable student accommodation and meet the definition of affordable accommodation set out in Policy H15, are eligible to follow the Fast Track Route. Such applications are not required to submit viability information to the GLA and are also exempt from a late stage review mechanism. All affordable bedrooms should accord with the definition of affordable student accommodation set out in paragraph 4.15.8 of the London Plan and as per paragraph 4.15.10 these rooms should be distributed across the various unit sizes proposed.

25 The development would provide 84 affordable student bedspaces, representing 35% of the total student accommodation provision. The applicant has stated that the affordable bedspaces 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. As such, subject to the rental level being secured at levels set out in the AMR, and the requirements with regard to nominations set out above, the application would comply with the requirements of Policy H15 and the scheme could be considered eligible for the Fast Track Route.

26 The applicant has stated that the exact affordable bedspaces are yet to be agreed with the Council, but that all occupants will benefit from access to the same communal spaces and facilities within the development. Whilst this is supported, to ensure that a range of unit sizes are provided as affordable, the S106 agreement should secure a fair distribution of affordable units across the range of unit sizes within the development.

27 In summary, the proposed student accommodation proposals comply with the London Plan, subject to the affordable student accommodation and nominations arrangements being appropriately secured.

Urban design

28 Good design is central to all objectives of the London Plan. Policies contained within chapter 3 of the London Plan set out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

Site layout and public realm

29 The site occupies the full depth of both blocks, with the commercial frontages at ground floor level. A new recessed student housing entrance is proposed onto Stanhope Street and series of full height glazed commercial entrances and frontages associated with the affordable workspace are proposed along William Road. The design and layout of the lower levels of the scheme are well-considered and creates a more active and pedestrian friendly environment. Public realm enhancements are proposed in the form of new planters, hard landscaping and street trees, providing an enhanced pedestrian experience.

Height and massing

30 London Plan Policy D9 seeks to ensure that tall buildings are appropriately located, well designed and able to enhance their immediate and wider settings. This Policy specifically states that tall buildings should only be developed in locations that are identified as suitable in development plans and that proposals should address visual, functions, environmental and the cumulative impacts of tall buildings.

31 The site is located within the Central Activities Zone and the Euston Opportunity Area and is within a highly accessible location relative to public transport (PTAL 6b), local services and higher education institutions. Further to this, the site is located in an area with a number of tall buildings, notably existing towers to the west and commercial development to the south and the emerging development around Euston Station to the east. However, the site is not in a location that is identified as suitable for a tall building, as Camden's Local Plan considers all parts of the borough as sensitive to the development of tall buildings. Therefore, whilst there are various characteristics of this site that offer material considerations for developing a tall building on the site, as noted above, this is a location that the local plan envisages as sensitive to tall buildings. Noting that London Plan Policy D9 states that tall buildings should only be developed in locations that are identified in development plans, it falls to officers to consider whether there might be material considerations that could justify a tall building at this site. Key to this exercise will be a robust assessment of the impact of the proposed tall building against the criteria within London Plan Policy D9, in conjunction with consideration of the public benefits of the proposal.

Visual impacts

32 The development is composed of a 5-storey podium and 15-storey tower element situated at the corner of William Road and Stanhope Street. The development represents a significant step change from the prevailing height of immediately adjoining properties within the urban block and means that the proposal would be visible from various locations within the vicinity. The applicant has undertaken an analysis of the surrounding built character and townscape as well as making the case of landmarking the site on the alignment of key routes towards Euston, Regents Park and Central London.

33 Since pre-application stage, the development has been reduced in height from 17 to 15 storeys. GLA officers consider that this relates well to the surrounding context/hierarchy of tall buildings, mediating between large scale commercial buildings on Euston Road, the nearby estate towers and the finer grain 'shoulder' buildings along Stanhope and William Rd.

34 The height reduction positively affects the scheme's relationship with the protected vistas as set out in further details below. At ground floor level, as noted above, the building maintains the pedestrian scale and character and enhances vitality through the introduction of active frontage.

35 The supporting Townscape, Visual and Built Heritage Assessment which includes accurate visual representations of the proposal from various important local viewpoints and includes an assessment of heritage impact. Having considered this, and notwithstanding the assessment of the impact of the proposals on heritage

assets which must be read in the context of paragraphs 194 & 195 of the NPPF and is addressed in full below, GLA officers are of the view that the development would make a positive contribution in immediate views, through the replacement of the existing poor quality building, and to the local townscape and skyline, through the development of a building of high architectural quality.

Functional impacts

36 The building has been well designed to accommodate the functional requirements of the proposed uses. The ground floor commercial space is flexible and capable of operating in a range of configurations. The standard of student accommodation is high and includes high quality access from street level (at prominent corner), with generous and welcoming lobby space, well designed interiors to units, and excellent amenity space offer (particularly at roof level). As noted above, the site is in an area of excellent accessibility and is within walking and cycling distances of a number of universities. As considered below, the development is supported by a fire strategy.

Environmental impacts

37 In terms of local microclimate, the impact of the building on wind and pedestrian comfort levels within the proposed public spaces at ground floor level and amenity spaces above was considered in the assessment submitted in support of the application. The assessment concludes that environment in all areas are suitable for their intended uses both from a Pedestrian Wind Comfort and a Safety perspective. GLA officers do not anticipate any significant wind microclimate issues in pedestrian areas surrounding the site.

38 The impact of the building on daylight and sunlight to the surrounding residential context has been assessed and modelling findings have fed into the design of the building. The assessment concludes that the development would have some impact but that this would be within acceptable parameters given the urban context of the site. Camden Council should undertake a full review of the environmental impacts as part of their assessment of the proposal as local planning authority. GLA officers will work with the Council to ensure that any necessary environmental mitigation measures would be appropriately secured.

Cumulative impact

39 Schafer House to the south represents the only other student accommodation within the immediate surrounding area. Having considered supporting technical assessments and reports and subject to the consideration of transport matters set out below, the development is not anticipated to give rise to cumulative functional impact on local amenity. The submitted Townscape, Visual and Built Heritage Assessment includes wireline visualisations of other consented development in the relevant long-range view allowing for an assessment of cumulative townscape and heritage impact. Having considered this, in conjunction with the assessment of strategic planning issues contained within this report, GLA officers are satisfied that there are no residual cumulative impacts of significance in strategic planning terms.

Conclusion - Height

40 Whilst GLA officers consider there may be material considerations that justify a tall building on the site, subject to the additional information requested above, the site is not located within an area identified for tall buildings and is therefore not in compliance with Policy D9. The applicant should engage closely with the Council on matters of neighbourhood amenity and local mitigation and ensure that the matters raised in the urban design and sustainable development sections of this report are appropriately addressed.

Strategic Views

41 London View Management Framework (LVMF) Protected Vistas 2A.2 and 2B.1 from Parliament Hill to the Palace of Westminster World Heritage Site, 4A.1 from Primrose Hill to St Pauls Cathedral and 5A.2 from Greenwich Park have been assessed as part of the applicant's Townscape Visual and Built Heritage Assessment (TVBHA).

42 The verified views assessment demonstrates that, whilst the development would be visible in the landmark viewing corridor of assessment point 2A.2, and would rise above the threshold plane in this view, it would be viewed in the context of the broader context, particularly the taller development at 10 Brock Street. The development would be visible in views from LVMF assessment point 2B.1 but this would be outside the landmark viewing corridor and at a scale that would not impact on the skyline. As such, in both views the development would not impact on the background setting or protected silhouette of the Palace of Westminster World Heritage Site or its overall value and significance.

43 Whilst visible in the protected vista 4A.1 from Primrose Hill to St Pauls Cathedral, the development would be well outside the landmark viewing corridor on the periphery of the view, would not break the distant ridge line beyond, and would not alter a viewer's ability to recognise or appreciate the strategic landmark in this view. The proposal would, as such, not harm the characteristics and composition of the view or the ability to appreciate St Paul's Cathedral from Primrose Hill. The views assessment demonstrates that the proposals would not be largely obscured from in the LVMF 5.A1 from Greenwich Park view and as such and would not impact view or ability to appreciate St Paul's Cathedral.

44 GLA officers concur with the applicant's assessment and therefore the application complies with London Plan Policies HC2, HC3, and HC4, which relate to the London View Management Framework and World Heritage Sites.

Architecture

45 London Plan Policy D4 instructs that tall buildings must undergo a process of enhanced design scrutiny in the form of a transparent design review conducted by independent experts. In accordance with this policy the proposals were presented to Camden's Design Review Panel (DRP) in September of 2020. While the DRP was supportive of the quality of architectural expression, internal views and materiality, it found the proposals to be over scaled and the provision of public realm lacking. The applicant should continue to work to resolve the issues raised by the DRP.

46 The architecture has evolved with thorough contextual analysis and the resulting building proportions and façade articulation are very successful and aligned with requirements of London Plan design policies. Notwithstanding the principle point concerning the suitability of this site for a tall building from a planning policy perspective, GLA officers are of the view that the massing, design and materiality of the proposal has been well-considered in design terms, having regard to its immediate and wider context. The building would be visually distinctive in medium and local views with ordered and textured concrete and brick facades which successfully convey a sense of human scale.

47 The application includes a good level of detail on the finer building details of the façade articulation (window reveals, entrances and roof lines) and materials, detail which should be secured by condition. Overall, GLA officers are of the view that the proposed building represents high quality architecture. The Council should secure key materials by condition to ensure the scheme is of the high quality envisioned.

Quality of student accommodation

48 London Plan Policy H15 also requires purpose-built student accommodation to provide adequate functional living space for students in terms of the design and layout of bedrooms. Whilst there are no space standards for student accommodation, the Design and Access Statement should set out the range of unit types proposed and their size and access to communal facilities to enable GLA officers to undertake a qualitative assessment of the proposals. The current layout proposes a mix of studios and dual-occupancy units with two single bedrooms sharing communal kitchens and bathroom facilities. The standard of student accommodation is very high and includes high quality access from street level (at prominent corner), with generous and welcoming lobby space, well designed interiors to units, and excellent amenity space offer (particularly at roof level).

49 Whilst the proportion of single aspect north facing units would not be acceptable within a self-contained housing scheme, the arrangement proposed does not raise any particular strategic planning concerns in this particular instance, given the short-term nature of tenancies. This does, however, further highlight the need for well-designed communal facilities.

50 The success of the proposed amenity spaces is also subject to appropriate management and maintenance. Accordingly, management and maintenance plans should be secured within a Section 106 agreement. Measures to mitigate privacy impacts from within the courtyard to the residential dwellings, including high-quality landscaping and defensible spaces should also be secured.

Fire safety

51 In line with London Plan Policy D12, development proposals must achieve the highest standards of fire safety and demonstrate how they would achieve the highest standards of fire safety including details of construction methods and materials, means of escape, fire safety features, and means of access for fire service personnel. Additionally, Policy D5 seeks to ensure that all developments provide for a safe and dignified emergency evacuation for all users. To this end, in all developments where lifts are installed at least one lift per core (or more subject to capacity assessments)

should be a suitably sized fire evacuation lift to be used to evacuate people who require level access from buildings.

52 The proposals include an Outline Fire Strategy developed by a specialist fire consultant; however, it does not fully address the matters noted above and therefore does not yet fully comply with policy. The applicant should review the Draft Fire Safety Guidance available on the GLA website ([link here](#))² and amend the strategy to meet these requirements. A fire statement that comprehensively addresses the requirements of London Plan Policies D12 and D5 should be secured by the Council.

Heritage

53 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to conservation areas, for all planning decisions “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In relation to listed buildings, all planning decisions should ‘should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.

54 Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. In line with case law, any harm identified must be given considerable importance and weight.

55 Paragraph 189 of the NPPF further specifies that in determining applications, local planning authorities should require an applicant to describe the significance of any affected heritage assets, including any contribution made by their setting.

56 The applicant’s TVBHA demonstrates that the development is not likely to harm the setting of the Regent’s Park, a Grade I listed park and Conservation Area or the listed buildings therein or the Camden Town Conservation Area with the verified views assessment showing that the building would largely be screened by trees in summer and intervening development from the selected view points within the park and from southward views along Mornington Crescent. Where visible, the development would be of a scale, position and relationship to intervening development to not cause harm to character or appearance of the conservation areas.

57 On consideration of the assessment undertaken in the TVBHIA, GLA officers are of the view that the proposal is not of a scale, height and proximity to the Grade II listed buildings at 48-52 William Road, 190-204 (even) North Gower Street and St Mary Magdalene Church and School Annex to harm their setting or significance.

58 The development would be visually prominent in views of local heritage assets 184 to 192 Drummond Street and 40 to 46 Stanhope Street and 7 to 15 William Road; however, whilst visible, the development is would not harm the significance of

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/draft-fire-safety-guidance-pre-consultation-information-only>

these assets because the base of the building, with its sensitively designed proportions, heights and chamfered setbacks, relates well to these nearby properties.

59 As such, GLA officers are of the view that no harm would be caused to the setting and significance of the above designated heritage assets as described above. As such, the development would be in line with London Plan Policy.

Inclusive access

60 London Plan Policy D3 seeks to ensure that new development achieves the highest standards of accessible and inclusive design. The inclusive access arrangements within the scheme should be set out clearly in the Design and Access Statement and demonstrate that the proposed public realm and buildings can be entered and used safely, easily and with dignity by all and is convenient and welcoming for all users, without creating any barriers to access. Three units within the development are proposed as accessible with a further nine provided as adaptable (exceeding policy requirements for student accommodation), level thresholds across all internal and external entrances and a range of measures are proposed to enhance accessibility across the development should be secured via condition. The accessible units should be provided at a range of outlooks and in a variety of unit sizes to ensure wheelchair users have a choice of units.

Sustainable Development

Energy

61 Based on the information provided, the non-domestic element of the proposed development it is unclear whether the development would achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The methodology should be reviewed, and the applicant should ensure that the Baseline used is the Notional from the Be Lean case, assuming communal gas boilers for heating and hot water.

62 The applicant should note that the London Plan (2021) includes a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency which applicants will be expected to meet. The applicant should therefore model additional energy efficiency measures to meet the energy efficiency target. The hot water demand is high, and the applicant should consider the potential for wastewater heat recovery.

63 The applicant is proposing a Combined Heat and Power system; however, given the scale and nature of the development this is not acceptable, as set out in Policy SI3. Alternative low carbon heating methods should be investigated and the currently proposed strategy should be revised.

64 The GLA expects all major development proposals to maximise on-site renewable energy generation, where feasible. The applicant is, therefore, required to reinvestigate the inclusion of PV and they should provide a detailed roof layout to demonstrate that PV has been maximised and demonstrate any constraints.

65 Further information in relation to energy costs, minimising overheating risk, demonstrating potential for connection to a DHN and the proposed Air Source Heat

Pump system are required. The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. Detailed comments in relation to the required additional information have been provided separately to the Council.

Flood risk

66 The southern half of the site is located above a Secondary A Aquifer, as defined by the Environment Agency (EA), which corresponds to the Lynch Hill Gravel superficial deposits. There is therefore the potential for shallow groundwater beneath the site, which should be assessed, with appropriate mitigation measures provided if necessary.

67 The Applicant should provide an assessment of sewer flood risk and provide appropriate mitigation measures against the potential for elevated groundwater beneath the site.

68 The surface water drainage strategy for the proposed development does not comply with London Plan Policy SI 13, as it does not give appropriate regard to providing a sustainable drainage solution. The following should be provided:

- Confirmation that gravity discharge from the attenuation tank to the public sewer is feasible;
- Inclusion of a range of SuDS including rainwater harvesting and green roofs;
- Maintenance plan for the proposed SuDS and attenuation features; and
- Assessment of exceedance flood flow routes for events greater than the design 1 in 100 year event plus 40% climate change.

69 Detailed comments in relation to the required information have been provided separately to the applicant and the Council

70 The Applicant should aim to achieve a maximum indoor water consumption of 105 l/person/day, which can be achieved through incorporating additional measures such as a leak detection system and rainwater harvesting and/or water recycling. The proposed development does not currently meet the requirements of London Plan Policy SI 5.

Circular Economy

71 London Plan objective GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the Mayor's aim for London to be a zero-carbon city by 2050. Policy D3 of the London Plan further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy.

72 As such, and in line with London Plan Policy SI7, a Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste. The pre-consultation draft of the Circular Economy Statements Guidance (March 2020) provides further information on how to prepare a Circular Economy Statement and is available on the GLA website.

Whole Life-Cycle Carbon

73 London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. A Whole Life-Cycle Carbon template (produced by the GLA) should be completed in accordance with the assessment guidance. The applicant should use these tools as the design progresses to calculate and reduce WLC emissions against the GLA's benchmarks provided in the guidance. The assessment guidance and template are available on the GLA website [here](#)³. The WLC Assessment must be provided prior to Stage 2.

Transport

Active Travel Zone (ATZ), Healthy Streets and Vision Zero

74 Public realm improvements works are proposed including the removal of the existing vehicle crossover on William Road and the reinstatement of the pedestrian footway.

75 The footway alterations and wider public realm works are supported in line with Policy D8 of the London Plan. An independent road safety audits and risk assessments should be undertaken in respect of these works. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The applicant should also consider the recommendations of the stage 1 safety audit for the final design.

76 Further clarification of what local streetscape improvements can be delivered via Section 278 (S278) to support Healthy Streets and active travel should be provided. This includes the A400 Hampstead Road bus reliability and road safety improvements identified in the Transport Assessment (TA). The TA has identified collision clusters at the junction of Drummond Street and Hampstead Road. The applicant should consider measures to mitigate any future safety risk and deliver measures accordingly.

Car Parking

77 The scheme's proposal as a car-free development is in line with the Mayor's Transport Strategy, Vision Zero and Healthy Streets. However, Policy T6.1 of the London Plan requires residential development proposals delivering ten or more units to deliver at least one designated disabled persons parking bay for 3% of dwellings (1 space), and further demonstrate provision for an additional 7% for further demand. Commercial floorspace should also have access to at least one space.

78 In order to satisfy the above policy, the applicant and Council should confirm that there is adequate capacity within proximity of the site. It should be noted that additional on-street blue badge parking on the TLRN in the vicinity cannot be provided.

³ <https://consult.london.gov.uk/whole-life-cycle-carbon-assessments>

Cycle Parking

79 The applicant proposes 180 long stay spaces and 8 short stay spaces for 239 student accommodation rooms, 20 long stay and 3 short stay spaces for the affordable workspaces, and re-provision of the existing residential cycle spaces of 12 long stay spaces. This is in line with London Plan Policy T5 Table 10.2. The additional student short stay provision of 20% in line with the Council's standards for larger bikes in association with accessible rooms. The applicant should also consider the parking provision of e-cargo bikes.

80 The majority of residential long stay cycle parking is proposed in the basement. The applicant is advised to make some internal design changes to improve usability and accessibility. All ground floor cycle stores are provided with step-free access and power assisted 1250mm leaf doors. Due to site constraints, the applicant has not proposed short-stay accessible spaces. The applicant should therefore seek to provide accessible short stay accessibility within the site's vicinity.

81 The applicant should consider how the development will support the strategic vision of the London wide cycle network including connecting local cycle routes and cycle hubs to encourage active travel in line with Policy T1 of the London Plan and the Mayor's Transport Strategy.

82 The applicant advises that they have followed Camden Council's cycle space standards for two-tiers, Sheffield and folding bike lockers. In addition, the applicant should clarify how they are meeting the London Cycle Design Standards (LCDS), for all cycles. The detailed design and delivery of all cycle parking should be secured by condition.

Trip generation and impacts

83 The approach to the trip generation assessment is acceptable; however, the applicant should clarify the daily profile of trips, as they would be expected to reflect resident commuting patterns in the morning peak.

Travel demand management

84 The commitment to a student and commercial travel plan should be suitably secured by condition. Mitigation may be required during student moving in/out periods for the potential increase of activity on the network. Further discussion is required with TfL officers to establish the appropriate approach for this.

Delivery Servicing and construction logistics

85 A delivery and servicing plan (DSP) has been submitted in support of the application, setting out measures to minimise and manage the impact of servicing movements. The proposal estimates 6-7 deliveries daily. TfL encourage the applicant inclusion of e-cargo bikes delivery into their delivery servicing plan. The final DSP should be secured by condition.

86 An outline Construction Logistics Plan has been submitted. Construction access will be from Hampstead Road, which TfL notes is also the route that HS2 related HGV traffic will also use. In addition, an updated Road Safety Audit (RSA) is

required as construction access uses the William Road junction with a Street Space Cycle space scheme on Hampstead Road and considering the collision data for Drummond Street and Hampstead Road. The RSA must address pedestrians/cyclists' safety around the site, particularly the northbound direction on Hampstead Road when vehicles are exiting the site.

87 The site is constrained, surrounded by neighbouring properties and the TLRN. As such, careful management of the construction period will be required and a full Construction Logistics Plan will need to be submitted for approval by TfL and the Council prior to commencement.

88 TfL expects a commitment to Direct Vision and Fleet Operators Recognition Scheme accreditation for all vehicles of at least Silver and Gold rating.

Local planning authority's position

89 Camden Council officers are currently assessing the application, a committee date has not been determined.

Legal considerations

90 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. Article 6 or 7 directions are considered against the requirements of the 2008 Order and are not made at the request of the applicant or any other party.

Financial considerations

91 There are no financial considerations at this stage.

Conclusion

92 London Plan policies on student accommodation, design, heritage, access, energy, and transport are relevant to this application. The application is broadly supported in strategic planning terms, but the following matters should be addressed to ensure full compliance with the London Plan:

- **Principle of development:** The principle of a student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace is acceptable and complies with Policies E1, H15 and H16, subject to student accommodation and affordable workspace being appropriately secured.

- **Student accommodation:** 35% of the student bedrooms would be affordable, in line with the London Plan and Fast Track Route criteria, set out in Policy H15. A S106 obligation to enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured.
- **Urban design and heritage:** The layout, design, public realm, and architectural quality of the scheme is supported. The site is not identified In Camden's Local Plan as suitable for tall buildings. No harm is identified to nearby heritage assets.
- **Sustainable Development:** The combined heat and power system is not acceptable and the wider heating strategy should be revised. Further information in relation to energy efficiency, energy costs, minimising overheating risk, potential for connection to a DHN and the proposed Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes of CO2 and the associated carbon offset payment that will be made to the borough. Further information is sought on flood risk. A Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste.
- **Transport:** The proposed development would be car-free, but arrangements for disabled persons car parking should be confirmed. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided.

for further information, contact GLA Planning Unit (Development Management Team):

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APPENDIX 5 – HISTORIC ENGLAND PRE-APPLICATION RESPONSE



Historic England

Mr David Shiels
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Direct Dial: 020 7973 3763

Our ref: PA01120405

16 September 2020

Dear Mr Shiels

Pre-application Advice

17-37 WILLIAM ROAD, EUSTON

Thank you for involving Historic England in pre-application discussions regarding the proposed development at 17-37 William Road in the London Borough of Camden. It was very useful to hear more about the emerging scheme at our meeting last Wednesday.

Historic England Advice

Significance

The development site occupies a prominent plot on the corner of William Road and Stanhope Street near Euston Station. The site does not include any designated heritage assets, and the existing six-storey office building is of low architectural quality in our opinion. However there are a number of historic buildings to the south along Stanhope Street including a pair of early 19th century terraced houses, and the Lord Nelson Public House - all listed at Grade II. On the corner with Drummond Street is a substantial early to mid-20th century office building which is included on the London Borough of Camden's Local List.

The site is also located within the viewing corridor of London View Management Framework (LVMF, 2012) View 2A.2 which includes a Protected Vista from the summit of Parliament Hill towards the Palace of Westminster World Heritage Site (WHS).

The LVMF Supplementary Planning Guidance (SPG, Mayor of London, March 2012) includes Visual Management Guidance for this Protected Vista. It states that "new development (in the foreground and middle ground) should preserve or enhance the viewer's ability to recognise and appreciate the Palace of Westminster in this view" (p46, Para 101). The SPG also includes general policies regarding Protected Vistas. It states that "where there is a Protected Vista... development that exceeds the threshold height of a Landmark Viewing Corridor should be refused" (Policy 7.12 F, p15).



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The development site also located approximately 230 metres from the eastern boundary of the Grade I Registered Regent's Park which is noted in this location for the Grade I listed park-fronting Regency townhouses which were largely designed by John Nash and constructed in c1825.

The Proposals and Their Impact

As explained at our meeting, the proposals involve total demolition on site and the erection of a 15-storey building to accommodate flexible workspace and student accommodation. The massing of the building would comprise of a lower section similar in height to the neighbouring historic buildings, and an upper tower. The pre-application report demonstrates that the tower element would project above the Threshold Plane of View 2A.2, but would appear directly in front of another modern building at 10 Brock Street, Regent's Place.

Historic England's Position

We have no concerns with the proposed demolition of the existing building on site, and we are comfortable with the scale of the development in relation to the nearby listed buildings given the mix of building heights in the Euston area. The two constituent parts of the building help to break down the overall mass of the building and provide an appropriate context to the historic streetscape. Similarly the design of the proposals, which draw influence from the locally listed corner office building, appear high quality and sympathetic to the architectural character of the area.

Whilst we are generally supportive of this architectural approach, we would encourage any opportunities to reinforce the prevailing parapet line along Stanhope Street in the detailing of the proposed building's lower mass.

The two main areas of sensitivity to us are the impact of the 15 storey tower on the Palace of Westminster WHS and on the Grade I Regency townhouses as seen from Regent's Park. Regarding the latter, the visual assessment provided in your pre-application report (p16-17) indicates that there would be no visibility of your development in key views from Regent's Park. We therefore have no concerns over this part of our assessment.

With regards to the Palace of Westminster, the proposals would break the Threshold Plane of View 2A.2 as we have previously set out. Whilst this impact is contrary to the LVMF guidance, the focus of our assessment is the effect that this impact has on the Outstanding Universal Value of the WHS. The recently constructed building at 10 Brock Street would appear larger than your proposals in this view, and would block its silhouette. Within this context, we consider that the viewer's ability to recognise and appreciate the Palace of Westminster in this view would be preserved, and that no harm to the Outstanding Universal Value of the WHS would result from these proposals.



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Historic England

We understand that the currently proposed height of 15 storeys has come about as a result of negotiations with Camden Council officers. We consider that any significant increase in height might have implications on the setting of heritage assets in the local and wider area. Nonetheless, on the basis of the scheme as currently presented, Historic England has no significant concerns.

Next Steps

We welcome the opportunity to engage in discussions regarding these plans at pre-application stage. As set out, these proposals raise no significant concerns to us, and we are content for Camden Council officers to lead on further pre-application discussions without our involvement.

Please note that these proposals relate to historic buildings and areas only. Comments on any archaeological implications should be sought from our colleagues in the Greater London Archaeological Advisory Service (GLAAS) on 0207 973 3712.

Yours sincerely

Alasdair Young

Alasdair Young
Inspector of Historic Buildings and Areas
E-mail: alasdair.young@HistoricEngland.org.uk

cc: Sandy Kidd, GLAAS, Historic England

17-37 WILLIAM ROAD, EUSTON Pre-application Advice

Information Provided

William Road (Morris+Company, August 2020)



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APPENDIX 6 – DESIGN REVIEW PANEL RESPONSE

London Borough of Camden Design Review Panel

Report of Formal Review Meeting: 17-37 William Road

Friday 25 September 2020

Video conference

Panel

Catherine Burd (chair)

Harriet Bourne

Ian Chalk

John McRae

Matthew Lloyd

Attendees

Kevin Fisher	London Borough of Camden
Ben Farrant	London Borough of Camden
Lavinia Scaletti	London Borough of Camden
Angela McIntyre	Frame Projects
Kiki Ageridou	Frame Projects

Apologies / report copied to

Bethany Cullen	London Borough of Camden
Richard Wilson	London Borough of Camden
Edward Jarvis	London Borough of Camden
Deborah Denner	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Camden Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

William Road , 35-37 William Road and 17-33 William Road, London, NW1 3ER

2. Presenting team

Peter Moore	MBU Capital
Joe Morris	Morris + Company
Miranda MacLaren	Morris + Company
Tania Marques	Morris + Company
Ben Myres	Morris + Company
Jack McFarlane	Morris + Company
David Shiels	DP9
Oliver Sheppard	DP9
Louise Newman	Tavernor Consultancy

3. Planning authority briefing

The site is located on the corner of William Road and Stanhope Street and comprises of two parts – a seven storey block at 17-33 William Road (Plot B) and a part six, part two storey building at 35-37 William Road (Plot A). The building is linked at ground floor level to 17-33 William Road.

The area is predominantly residential in character. Buildings to the south of Drummond Street tend to be taller and more commercial in scale. However north of Drummond Street where this site is located, the street character changes and is more domestic. There is a mix of building heights in this area, varying from two to eight storeys, with the majority around four storeys.

The site is located in the central London area and within the Euston Area Plan area. It is also within two London View Management Framework viewing corridors.

Plot B is proposed to be refurbished with the introduction of affordable workspace to the ground floor and changes in the façade. Plot A involves the demolition of an existing office and construction of a student housing block.

The panel's views were requested on: height and massing; whether this location is right for a landmark building; what impact this height might have on the pedestrian experience and viewing corridors. Officers also asked the panel to comment on the level of communal amenity space provided for the occupants of the building, and the building's architecture and materiality.



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4. Design Review Panel's views

Summary

The design review panel commends the analysis, generation of ideas and design quality coming forward as part of the proposals. However, it considers that the proposed brief is too challenging, forcing a scheme that results in significant overdevelopment of the site, one that puts viability before city making. It considers the proposals are over scaled in bulk and height and mix two confused building typologies. The panel encourages careful thought around whether the building is a stand-alone tower in open space, or a piece of street in the form of a reimagined warehouse / mansion block. In either case, massing must be refined to ensure the scheme respects both the streetscape and the skyline. The panel commends the quality of architectural expression, particularly the sculpted entrance to the student accommodation on William Road. While the proposed student rooms appear to be high quality the panel would like to see a long term operator in place to ensure this quality is delivered. The use of a single stair requires careful consideration to ensure it is a sustainable approach that ensures the building is futureproofed. The panel is concerned with the lack of outdoor amenity space proposed and would like to see more of this provided. While internal amenity space is welcomed, the function and quality of this should be thoroughly scrutinised, and should contribute to the sense of community within the building. These points are expanded below.

Scale and massing

- The panel finds the proposals to be over scaled for this location and site.
- It considers that the building's massing combines two confused typologies – the design team should carefully consider whether the building is a tower or a warehouse / mansion block.
- If the proposal is a continuation of street, expressed as a warehouse / mansion block, there is justification for its massing to spread to the edges of the site, but its height must be reduced to around eight stories to sit comfortably in its context.
- Alternatively, if the proposal is a tower, the panel suggest this should be much more slender with much more open space at ground level, set away from the corner of Stanhope Street and William Road.
- If a tower option is pursued (and the panel is not convinced this is necessarily the correct approach) it would be unacceptable for proposals to be any taller than currently proposed. Changes would need to be made to the building's proportions, with a significant reduction in mass elsewhere, for the proposed height to be potentially acceptable.
- The panel notes other towers referenced in the locality are much more slender in their proportions.



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- The shoulder of the warehouse / mansion block sits above the datum created by the existing context, and careful thought is needed to resolve this relationship.
- The panel does not consider long views are the primary issue for this scheme: it considers local 'streetscape' and 'skyscape' views to be more important. It encourages the design team to think carefully about the impact of the scheme's bulk on these views and the public realm.
- Proposed massing should be tested to establish the effect on factors such as daylight and sunlight and neighbouring buildings.
- While the panel enjoys the use of chamfering at the corner, this appears to exaggerate the building's width and bulk in some views.

Architectural expression

- The panel commends the quality of architectural expression proposed in a context where it is difficult to pin down a particular architectural style.
- The proposed materiality is well considered, and the panel feels assured that once the bulk and massing has been refined the proposals could be of an exemplary quality.
- The panel particularly enjoys the sculpted entrance to the student accommodation on William Road.
- It considers that the chamfer to the building's corner on Stanhope Street and William Road should carry on through the proposal's ground floor.

Internal arrangement

- In principle the internal views shown of student accommodation appear of high quality. However, the panel questions how to ensure the quality aspiration is secured and delivered if a long term operator is not in place.
- The panel considers it unlikely that residents of the 'twodios' will leave the window between their bedroom and the kitchen unobscured, this will lead to loss of natural light in the shared kitchen space and have a negative effect on its quality.
- The panel is concerned with the proposal for a single stair core in a building which is significantly over 18 metres in height. Fire safety is an important issue and designs may be compromised by changes in regulations in the future.
- Futureproofing and sustainability should be carefully considered. For example, how feasible it may be to convert the building for another use.



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- The panel would like a clearer understanding of how the building is serviced and how plant proposed as roof level is screened.

Amenity space

- In the panel's view the building gives very little back to the public realm at street level.
- It would like to see the inclusion of street trees along the wide pavements on Stanhope Street.
- The panel query the impact that this proposed increase in student population will have on the residential quality and amenities of the local area.
- The panel is concerned about the minimal quantity of external amenity space proposed for 239 student rooms, and the potential effect of this on student quality of life.
- It highlights that in the immediate surroundings of the site there is little amenity space for students to use, and so in its view the building must provide more outdoor space specifically for its residents.
- While the panel welcomes the inclusion of internal amenity space it would like to see this carefully scrutinised to ensure it will be successful.
- It emphasises the importance of having enjoyable shared social spaces which will give the building a social dynamic and sense of community, currently missing from proposals.
- Thought should be given to spaces for chance interactions and for residents to meet their neighbours.

Sustainability

- While the panel is encouraged that the building aims to achieve BREEAM excellent, it notes that a broader sustainability strategy should be set out in the planning submission.
- It would like to see careful consideration of embodied carbon, especially as an existing building is being replaced with a new build. Consideration should also be given to construction techniques proposed.

Next steps

The panel would welcome the opportunity to review proposals at a further review once revised in response to the comments above.



APPENDIX 7 – LBC EMAIL DATED 19TH FEBRUARY 2021

David Shiels

Subject: FW: 2020/5473/P - 17-37 William Road

From: Young, Nathaniel <Nathaniel.Young@camden.gov.uk>

Sent: 19 February 2021 12:08

To: David Shiels <david.shiels@dp9.co.uk>

Subject: RE: 2020/5473/P - 17-37 William Road

Hi David,

I have received the following design comments:

- According to Policy D1 in relation to tall buildings, 'All of Camden is considered sensitive to the development of tall buildings'. This means that each proposed tall building should be carefully scrutinised and go through detailed design assessments. This also includes:
 - How the building relates to its surroundings, both in terms of how the base of the building fits in within the streetscape and how the top of a tall building affects the skyline
 - The historic context of the building's surroundings
 - The relationship between the building and hills and views
 - The degree to which the building overshadows public spaces, especially open spaces and watercourses
 - The contribution a building makes to pedestrian permeability and improved public accessibility

Relationship with surroundings

- The submitted development still presents a substantial increase in height within the existing perimeter block, being 15 storeys in height. This was reduced from an initial 18 storey throughout the pre-app process. The proposed is still considered too tall for the location, and does not sit comfortably within the immediate area, where height varies from two to eight storeys, with a majority of buildings of around four storeys.
- Although there are some tall buildings in the wider area, the location of the site does not seem appropriate for accommodating a tall building as it is part of a perimeter block with a relatively constant datum height. Its corner location makes the development more prominent and therefore the proposed scale would be highly visible.
- The scale and design of the base is acceptable in terms of its relationship to the perimeter block and surrounding buildings. However, the mid and upper building elements appear too dominant and in contrast with the immediate surrounds.
- The area where the proposal is located is residential in character, with a much lower scale and density than around Euston Road. Buildings in this area become lower in scale, starting to decrease in height north of Drummond Street. The area has a more domestic and quieter feel, and the proposed character for the building would therefore not fit into this context due to its mass and scale.
- Officers do acknowledge that part of the proposed character for the building has been drawn from the industrial character of some buildings within the perimeter block. However, due to its size and location, the proposal reads as a standalone landmark building rather than a building complementing its surroundings.
- Additionally, the DRP panel suggested rethinking the typology put forward, mentioning it could either be a podium building, with a much reduced mass, or the preferred option of a mansion block/perimeter typology, of much reduced height (around 8 storeys). The proposal put forward does not respond to these comments and instead seems unchanged in regards to this issue.
- Issues of overshadowing and overlooking of adjoining properties should also be taken into account. In particular, the proposed tall building sits south of Netley building, on the opposite side of William Road, and it will likely create overshadowing onto this block. It has not been demonstrated that the proposal will not negatively impact the surrounding buildings.

Historic context

- The proposed building seems to have no relationship with its historic context, in particular with the listed buildings. (Colette to add on this?)

Impact on views – long and short

- The development would sit above both the LVMF 5A.2 and LVMF 2A.2 threshold line, although the Design and Access Statement states it will have ‘no material effect on the LVMF’ as most of the development will be obscured by other taller ones. Although this might be correct, the concerns raised by both design officers and the DRP is that medium and short views will be substantially affected.
- We acknowledge that design work has been done to mitigate this impact at ground floor through the consideration of various building elements and datum lines to bring the scale down at ground level. However there is still concern the proposal is likely to have a detrimental impact in the immediate context, as approaching the site from various points and when standing by the tower element. This is particular evident in the view from Stanhope Street facing North, where there is a stark contrast between the Georgian terraces at the foreground and the proposed tower. The negative impact is also visible in views closer to the development, nearing the junction, where the building dominates and impacts the pedestrian experience.

Overdevelopment

- The site is not considered large enough to accommodate a building of this mass and scale, and therefore we consider there is too much development. The proposal for Plot A occupies the whole site footprint and is built directly on the back of a narrow pavement, contrary to some of the taller buildings and towers around the area which sit back from the building line and have a less negative impact onto the public realm. Examples of this in the immediate area are the Netley building opposite, 8 storeys high but with a generous setback for external amenity space and breathing space, or the towers on the Regent Park Estate, on a podium, setback from the street and as part of a wider masterplan with a series of open spaces and elements of varied density and scale. Several tall buildings on Euston Road also provide a similar building setting and have setbacks that increase the area of external public space.
- These developments give something back to the site and offer a range of public benefits, such as front verges, expansive public space and affordable housing.
- Chamfered corner, the setbacks and recesses are used to reduce the visibility and impact of the building’s mass onto its surroundings. These moves are not considered enough to reduce the negative impact of the proposal, and the proposed block still appears tall, wide and out of proportion in relation to the surrounding buildings. Even if comparing the proposed building to Regent’s Park Estate towers, which are taller, these are slimmer and setback from the street.

Impact on public realm

- There are concerns on how the height and density of the proposal might feel dominant onto the street and make it feel ‘tight’ around. In particular, having the building come all the way to the back of the footway will create an overbearing feel on the pedestrian experience.
- An interior open courtyard at ground floor, and an open terrace and loggia at floor 14 are proposed as areas for amenity use, as well as ground floor openings for planters and benches. This proposed outdoor amenity space falls short of what we would expect of a building of this size and density, and this is particularly crucial in pandemic and post-pandemic times where access to outdoor space should be maximised.

Design quality

- Although we acknowledge that the emerging architecture and details of the proposal are of merit and a positive aspect of the proposal, in particular the design of the ground floor and the façade studies, it does not compensate with the negative impact and harm caused by the mass and scale of the scheme.

Overall, we still think that the proposal put forward does not respond to our concerns of mass and scale and that it would therefore negatively impact its surroundings.

I am awaiting feedback from our economic development team regarding the employment space queries – I will let you know once I have an update.

Kind regards,

Nathaniel Young
Planning Officer

Telephone: 020 7974 3386



The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

APPENDIX 8 – GLA STAGE 1 REPORT

planning report 2020/6844/S1

8 March 2021

17-37 William Road

in the London Borough of Camden

planning application no. 2020/5473/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment to deliver a 15 storey (plus basement) building to provide 239 student bed spaces together with commercial floorspace at ground floor level and associated works.

The applicant

The applicant is **Euston One Limited**, and the architect is **Morris + Company**.

Strategic issues

Principle of development: The principle of student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace complies with Policies E1, H15 and H16, subject to securing student accommodation and affordable workspace (paragraphs 14-23).

Student accommodation: 35% of the student bedrooms would be affordable, in line with the Publication London Plan and Fast Track Route criteria. A S106 obligation to enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured (paragraphs 24-27).

Urban design and Heritage: The layout, design, public realm, and architectural quality of the scheme is supported. The site is not identified in Camden's Local Plan as suitable for tall buildings. Having regard to the townscape assessment, the height of the proposed development can be supported. No harm is identified to nearby heritage assets (paragraphs 28-60).

Sustainable Development: CHP is not supported, and the wider heating strategy should be revised. Further information relating to energy efficiency, energy costs, overheating, potential for a DHN connection and the Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes and the associated carbon offset payment. Further information is sought on flood risk. A Circular Economy Statement should be submitted (paragraphs 61-73).

Transport: The proposed car free residential-led development is supported in principle. Disabled persons car parking provision should be confirmed. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided (paragraphs 74-88).

Recommendation

That Camden Council be advised that, whilst the proposal is supported in principle, the application does not currently comply with the London Plan and Publication London Plan, for the reasons set out in paragraph 92 of this report.

Context

1 On 27 November 2020 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Category of the Schedule to the Order 2008:

- 1C(c) *"building is more than 30 metres high and is outside the City of London."*

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA's website ([link here](#))¹.

Site description

5 The site constitutes a parcel of approximately 0.2 hectares of land bound by William Road to the north, Stanhope Street to the west, four storey commercial development to the east, and a mixture of three and four storey residential buildings to the south. The application site is divided into two development plots. Plot A, on the corner of William Street and Stanhope Street, is presently occupied by a mid-20th century vacant office building (B1 use) ranging two to six storeys in height. Plot B, on the eastern portion of the site, is presently occupied by an early 21st century building of seven storeys in height. The building on Plot B presently contains unoccupied office floorspace at ground floor (B1 use), and residential flats (C3 use) on upper floors. All of this housing is currently affordable. The site is within the Central Activities Zone, Central London Area, and Euston Opportunity Area.

6 The development site is bound by Stanhope Street to the west and A295 William Road to the north, both part of Camden's highway network. The A400 Hampstead Road which forms part of the Transport for London Road Network (TLRN) is 70 metres to the east. The nearest section of the Strategic Road Network is the A400 Tottenham Court Road, approximately 250 metres south.

7 The site has a highest Public Transport Access Level (PTAL) rating of 6b, which is excellent. The site is within walking distance of Regents Park, Euston Square, Warren Street and Euston which provide access to London Underground, London Overground and National Rail services. 3 bus stops within 500m of the site provide access to 13 bus routes.

¹ <https://gla.force.com/pr/s/>

8 The site itself does not contain any designated heritage assets; however, there are heritage assets in the vicinity, including the Grade I listed Regent's Park; Grade II listed 48-52 Stanhope Street, 190-204 (even) North Gower Street and St Mary Magdalene Church and School Annex; and locally listed 184 to 192 Drummond Street, 40-46 Stanhope Street and 7-15 William Road. The site also sits outside but in the vicinity of the Camden Conservation Area. Additionally, the site lies within two protected views as identified in the London View Management Framework (LVMF): the background wider setting consultation area of view 5A.2 from Greenwich Park to St. Paul's Cathedral and the landmark viewing corridor of view 2A.2 from Parliament Hill Summit looking toward the Palace of Westminster.

Details of the proposal

9 The proposed development seeks to demolish the existing building on Plot A and convert the ground floor of Plot B to provide a new building ranging in height up to 15 storeys providing:

- 1,255 sqm of affordable workspace;
- Student accommodation (239 student bed spaces) on the upper floors of Plot A;
- Public realm improvements to William Road and Stanhope Street; and
- Retention of existing affordable homes on upper floors of Plot B.

Case history

10 A pre-application meeting was held with the GLA on 5 May 2020. GLA officers advised that the principle of redeveloping the site with a mixed-use scheme delivering student accommodation and commercial space is supported in the Central Activities Zone (CAZ) and Euston Opportunity Area. Officers sought justification for any loss of office floorspace in the CAZ and that the applicant should ensure that the issues raised regarding affordable housing, urban design, heritage, sustainability, and transport be fully addressed prior to the submission of any planning application.

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Camden Local Plan 2017 and the London Plan (2021).

12 The following are relevant material considerations:

- National Planning Policy Framework (2019) and National Planning Practice Guidance; and
- Euston Area Plan (2015).

13 The relevant strategic issues and corresponding policies are as follows:

- | | |
|---------------------------|--|
| • Land use principles | <i>London Plan</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG;</i> |
| • CAZ | <i>London Plan;</i> |
| • Opportunity Areas | <i>London Plan;</i> |
| • Urban design | <i>London Plan; Character and Context SPG;</i> |
| • Heritage | <i>London Plan;</i> |
| • Inclusive access | <i>London Plan; Accessible London SPG;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy.</i> |

Principle of development

Office and employment use

14 Policy E1 of the London Plan (2021) seeks improvements to the quality, flexibility and adaptability of office space at varying sizes within the Central Activities Zone, alongside increases to the overall quantum of available office stock.

15 The existing application site presently provides 3,693 sq.m. of commercial floorspace, of which 2,266 sq.m is office accommodation and 1,427 sq.m is basement level ancillary and storage space, although it is noted that the office floorspace is presently unoccupied and has been since 2018. By contrast, the proposed scheme would deliver 1,255 sq.m. of new flexible office (B1) floorspace, which represents a net loss of 2,438 sq.m. of total commercial floorspace (1,011 sq.m of office accommodation) compared with the existing situation.

16 Notwithstanding the broad policy objectives to increase the provision of office floorspace within the Central Activities Zone; Policy E1(l) of the London Plan provides scope for the redevelopment, intensification and change of use of surplus office space to other uses (including housing), subject to consideration of the need for a range of suitable workspace including small units, flexible and affordable work spaces. In this respect, it is noted that all of the proposed 1,255 sq.m. of new office floorspace is proposed to be 'affordable workspace' and would include a range of flexible and divisible units suitable for a range of tenants including Small and Medium Enterprises (SMEs).

17 The office floorspace has been vacant since 2018 and unsuccessfully marketed since 2019, as set out in the supporting Marketing and Demand report. The site is deemed an undesirable location given its poor quality and the abundance of available office space of differing quality and size in the immediate vicinity and the wider CAZ area. The site is deemed no longer required by the market and as such, it is accepted that there is no reasonable prospect of the office building being used for business purposes.

18 The development would introduce 1,255 sq.m of affordable employment floorspace in Class B1 use which would be provided as managed workspace or incubator space suitable and flexibly designed for start-up and small and medium sized businesses. The details of the affordable workspace offer in terms of rental discount, management and timescale should be clarified and secured via Section 106 agreement.

19 The office accommodation proposed within the scheme complies with the strategic planning policies and objectives relating to the CAZ, opportunity areas, office floorspace and affordable and SME workspace as set out in the London Plan and would make a positive contribution towards the local employment offer and the objectives of the Euston Area Plan.

Student accommodation

20 Policy H15 of the London Plan (2021) requires Councils to ensure that local and strategic need for purpose-built student accommodation (PBSA) is addressed. Paragraph 4.15.5 of the London Plan, in support of Policy H15, stipulates that in order to be considered Purpose Built Student Accommodation (PBSA), student accommodation must either be operated directly by a higher education provider or have a nomination agreement with one or more higher education providers in place from initial occupation (and secured for the duration of occupation for this purpose). Policy H15 further states that PBSA should be developed in locations that are well connected local services by walking, cycling and public transport and should contribute to a mixed and inclusive neighbourhood.

21 The site is highly accessible, owing to its location within the CAZ, being within walking distance of a number of higher education institutions including University College London, SOAS, University of Westminster, Birkbeck University and the Royal Academy of Dramatic Art and the proposals have been informed by the requirements of the intended student accommodations operator with whom the applicant is in discussions.

22 The applicant proposes to restrict the occupation of the student accommodation to full-time students from local higher education institutions only through a s106 planning obligation. As per paragraph 4.15.5 of the London Plan, failure to demonstrate that the accommodation has been secured for use by students and secured through a nomination agreement with a higher education provider would result in the development being assessed under Policy H16 of the London Plan on large-scale purpose-built shared living. Proposals for large-scale purpose-built shared living will need to make an affordable housing contribution in the form of a payment in lieu. Affordable housing is discussed in further detail below.

Conclusion – Principle of development

23 In summary, the principle of the mixed-use redevelopment of the site to provide student accommodation, and affordable workspace is acceptable in accordance with Policies E1, H15 and H16, subject to the proposed affordable workspace and student accommodation being appropriately secured.

Student accommodation

24 London Plan Policy H15 specifies that purpose-built student accommodation schemes, which provide a minimum 35% affordable student accommodation and meet the definition of affordable accommodation set out in Policy H15, are eligible to follow the Fast Track Route. Such applications are not required to submit viability information to the GLA and are also exempt from a late stage review mechanism. All affordable bedrooms should accord with the definition of affordable student accommodation set out in paragraph 4.15.8 of the London Plan and as per paragraph 4.15.10 these rooms should be distributed across the various unit sizes proposed.

25 The development would provide 84 affordable student bedspaces, representing 35% of the total student accommodation provision. The applicant has stated that the affordable bedspaces 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. As such, subject to the rental level being secured at levels set out in the AMR, and the requirements with regard to nominations set out above, the application would comply with the requirements of Policy H15 and the scheme could be considered eligible for the Fast Track Route.

26 The applicant has stated that the exact affordable bedspaces are yet to be agreed with the Council, but that all occupants will benefit from access to the same communal spaces and facilities within the development. Whilst this is supported, to ensure that a range of unit sizes are provided as affordable, the S106 agreement should secure a fair distribution of affordable units across the range of unit sizes within the development.

27 In summary, the proposed student accommodation proposals comply with the London Plan, subject to the affordable student accommodation and nominations arrangements being appropriately secured.

Urban design

28 Good design is central to all objectives of the London Plan. Policies contained within chapter 3 of the London Plan set out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

Site layout and public realm

29 The site occupies the full depth of both blocks, with the commercial frontages at ground floor level. A new recessed student housing entrance is proposed onto Stanhope Street and series of full height glazed commercial entrances and frontages associated with the affordable workspace are proposed along William Road. The design and layout of the lower levels of the scheme are well-considered and creates a more active and pedestrian friendly environment. Public realm enhancements are proposed in the form of new planters, hard landscaping and street trees, providing an enhanced pedestrian experience.

Height and massing

30 London Plan Policy D9 seeks to ensure that tall buildings are appropriately located, well designed and able to enhance their immediate and wider settings. This Policy specifically states that tall buildings should only be developed in locations that are identified as suitable in development plans and that proposals should address visual, functions, environmental and the cumulative impacts of tall buildings.

31 The site is located within the Central Activities Zone and the Euston Opportunity Area and is within a highly accessible location relative to public transport (PTAL 6b), local services and higher education institutions. Further to this, the site is located in an area with a number of tall buildings, notably existing towers to the west and commercial development to the south and the emerging development around Euston Station to the east. However, the site is not in a location that is identified as suitable for a tall building, as Camden's Local Plan considers all parts of the borough as sensitive to the development of tall buildings. Therefore, whilst there are various characteristics of this site that offer material considerations for developing a tall building on the site, as noted above, this is a location that the local plan envisages as sensitive to tall buildings. Noting that London Plan Policy D9 states that tall buildings should only be developed in locations that are identified in development plans, it falls to officers to consider whether there might be material considerations that could justify a tall building at this site. Key to this exercise will be a robust assessment of the impact of the proposed tall building against the criteria within London Plan Policy D9, in conjunction with consideration of the public benefits of the proposal.

Visual impacts

32 The development is composed of a 5-storey podium and 15-storey tower element situated at the corner of William Road and Stanhope Street. The development represents a significant step change from the prevailing height of immediately adjoining properties within the urban block and means that the proposal would be visible from various locations within the vicinity. The applicant has undertaken an analysis of the surrounding built character and townscape as well as making the case of landmarking the site on the alignment of key routes towards Euston, Regents Park and Central London.

33 Since pre-application stage, the development has been reduced in height from 17 to 15 storeys. GLA officers consider that this relates well to the surrounding context/hierarchy of tall buildings, mediating between large scale commercial buildings on Euston Road, the nearby estate towers and the finer grain 'shoulder' buildings along Stanhope and William Rd.

34 The height reduction positively affects the scheme's relationship with the protected vistas as set out in further details below. At ground floor level, as noted above, the building maintains the pedestrian scale and character and enhances vitality through the introduction of active frontage.

35 The supporting Townscape, Visual and Built Heritage Assessment which includes accurate visual representations of the proposal from various important local viewpoints and includes an assessment of heritage impact. Having considered this, and notwithstanding the assessment of the impact of the proposals on heritage

assets which must be read in the context of paragraphs 194 & 195 of the NPPF and is addressed in full below, GLA officers are of the view that the development would make a positive contribution in immediate views, through the replacement of the existing poor quality building, and to the local townscape and skyline, through the development of a building of high architectural quality.

Functional impacts

36 The building has been well designed to accommodate the functional requirements of the proposed uses. The ground floor commercial space is flexible and capable of operating in a range of configurations. The standard of student accommodation is high and includes high quality access from street level (at prominent corner), with generous and welcoming lobby space, well designed interiors to units, and excellent amenity space offer (particularly at roof level). As noted above, the site is in an area of excellent accessibility and is within walking and cycling distances of a number of universities. As considered below, the development is supported by a fire strategy.

Environmental impacts

37 In terms of local microclimate, the impact of the building on wind and pedestrian comfort levels within the proposed public spaces at ground floor level and amenity spaces above was considered in the assessment submitted in support of the application. The assessment concludes that environment in all areas are suitable for their intended uses both from a Pedestrian Wind Comfort and a Safety perspective. GLA officers do not anticipate any significant wind microclimate issues in pedestrian areas surrounding the site.

38 The impact of the building on daylight and sunlight to the surrounding residential context has been assessed and modelling findings have fed into the design of the building. The assessment concludes that the development would have some impact but that this would be within acceptable parameters given the urban context of the site. Camden Council should undertake a full review of the environmental impacts as part of their assessment of the proposal as local planning authority. GLA officers will work with the Council to ensure that any necessary environmental mitigation measures would be appropriately secured.

Cumulative impact

39 Schafer House to the south represents the only other student accommodation within the immediate surrounding area. Having considered supporting technical assessments and reports and subject to the consideration of transport matters set out below, the development is not anticipated to give rise to cumulative functional impact on local amenity. The submitted Townscape, Visual and Built Heritage Assessment includes wireline visualisations of other consented development in the relevant long-range view allowing for an assessment of cumulative townscape and heritage impact. Having considered this, in conjunction with the assessment of strategic planning issues contained within this report, GLA officers are satisfied that there are no residual cumulative impacts of significance in strategic planning terms.

Conclusion - Height

40 Whilst GLA officers consider there may be material considerations that justify a tall building on the site, subject to the additional information requested above, the site is not located within an area identified for tall buildings and is therefore not in compliance with Policy D9. The applicant should engage closely with the Council on matters of neighbourhood amenity and local mitigation and ensure that the matters raised in the urban design and sustainable development sections of this report are appropriately addressed.

Strategic Views

41 London View Management Framework (LVMF) Protected Vistas 2A.2 and 2B.1 from Parliament Hill to the Palace of Westminster World Heritage Site, 4A.1 from Primrose Hill to St Pauls Cathedral and 5A.2 from Greenwich Park have been assessed as part of the applicant's Townscape Visual and Built Heritage Assessment (TVBHA).

42 The verified views assessment demonstrates that, whilst the development would be visible in the landmark viewing corridor of assessment point 2A.2, and would rise above the threshold plane in this view, it would be viewed in the context of the broader context, particularly the taller development at 10 Brock Street. The development would be visible in views from LVMF assessment point 2B.1 but this would be outside the landmark viewing corridor and at a scale that would not impact on the skyline. As such, in both views the development would not impact on the background setting or protected silhouette of the Palace of Westminster World Heritage Site or its overall value and significance.

43 Whilst visible in the protected vista 4A.1 from Primrose Hill to St Pauls Cathedral, the development would be well outside the landmark viewing corridor on the periphery of the view, would not break the distant ridge line beyond, and would not alter a viewer's ability to recognise or appreciate the strategic landmark in this view. The proposal would, as such, not harm the characteristics and composition of the view or the ability to appreciate St Paul's Cathedral from Primrose Hill. The views assessment demonstrates that the proposals would not be largely obscured from in the LVMF 5.A1 from Greenwich Park view and as such and would not impact view or ability to appreciate St Paul's Cathedral.

44 GLA officers concur with the applicant's assessment and therefore the application complies with London Plan Policies HC2, HC3, and HC4, which relate to the London View Management Framework and World Heritage Sites.

Architecture

45 London Plan Policy D4 instructs that tall buildings must undergo a process of enhanced design scrutiny in the form of a transparent design review conducted by independent experts. In accordance with this policy the proposals were presented to Camden's Design Review Panel (DRP) in September of 2020. While the DRP was supportive of the quality of architectural expression, internal views and materiality, it found the proposals to be over scaled and the provision of public realm lacking. The applicant should continue to work to resolve the issues raised by the DRP.

46 The architecture has evolved with thorough contextual analysis and the resulting building proportions and façade articulation are very successful and aligned with requirements of London Plan design policies. Notwithstanding the principle point concerning the suitability of this site for a tall building from a planning policy perspective, GLA officers are of the view that the massing, design and materiality of the proposal has been well-considered in design terms, having regard to its immediate and wider context. The building would be visually distinctive in medium and local views with ordered and textured concrete and brick facades which successfully convey a sense of human scale.

47 The application includes a good level of detail on the finer building details of the façade articulation (window reveals, entrances and roof lines) and materials, detail which should be secured by condition. Overall, GLA officers are of the view that the proposed building represents high quality architecture. The Council should secure key materials by condition to ensure the scheme is of the high quality envisioned.

Quality of student accommodation

48 London Plan Policy H15 also requires purpose-built student accommodation to provide adequate functional living space for students in terms of the design and layout of bedrooms. Whilst there are no space standards for student accommodation, the Design and Access Statement should set out the range of unit types proposed and their size and access to communal facilities to enable GLA officers to undertake a qualitative assessment of the proposals. The current layout proposes a mix of studios and dual-occupancy units with two single bedrooms sharing communal kitchens and bathroom facilities. The standard of student accommodation is very high and includes high quality access from street level (at prominent corner), with generous and welcoming lobby space, well designed interiors to units, and excellent amenity space offer (particularly at roof level).

49 Whilst the proportion of single aspect north facing units would not be acceptable within a self-contained housing scheme, the arrangement proposed does not raise any particular strategic planning concerns in this particular instance, given the short-term nature of tenancies. This does, however, further highlight the need for well-designed communal facilities.

50 The success of the proposed amenity spaces is also subject to appropriate management and maintenance. Accordingly, management and maintenance plans should be secured within a Section 106 agreement. Measures to mitigate privacy impacts from within the courtyard to the residential dwellings, including high-quality landscaping and defensible spaces should also be secured.

Fire safety

51 In line with London Plan Policy D12, development proposals must achieve the highest standards of fire safety and demonstrate how they would achieve the highest standards of fire safety including details of construction methods and materials, means of escape, fire safety features, and means of access for fire service personnel. Additionally, Policy D5 seeks to ensure that all developments provide for a safe and dignified emergency evacuation for all users. To this end, in all developments where lifts are installed at least one lift per core (or more subject to capacity assessments)

should be a suitably sized fire evacuation lift to be used to evacuate people who require level access from buildings.

52 The proposals include an Outline Fire Strategy developed by a specialist fire consultant; however, it does not fully address the matters noted above and therefore does not yet fully comply with policy. The applicant should review the Draft Fire Safety Guidance available on the GLA website ([link here](#))² and amend the strategy to meet these requirements. A fire statement that comprehensively addresses the requirements of London Plan Policies D12 and D5 should be secured by the Council.

Heritage

53 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to conservation areas, for all planning decisions “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In relation to listed buildings, all planning decisions should ‘should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.

54 Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. In line with case law, any harm identified must be given considerable importance and weight.

55 Paragraph 189 of the NPPF further specifies that in determining applications, local planning authorities should require an applicant to describe the significance of any affected heritage assets, including any contribution made by their setting.

56 The applicant’s TVBHA demonstrates that the development is not likely to harm the setting of the Regent’s Park, a Grade I listed park and Conservation Area or the listed buildings therein or the Camden Town Conservation Area with the verified views assessment showing that the building would largely be screened by trees in summer and intervening development from the selected view points within the park and from southward views along Mornington Crescent. Where visible, the development would be of a scale, position and relationship to intervening development to not cause harm to character or appearance of the conservation areas.

57 On consideration of the assessment undertaken in the TVBHIA, GLA officers are of the view that the proposal is not of a scale, height and proximity to the Grade II listed buildings at 48-52 William Road, 190-204 (even) North Gower Street and St Mary Magdalene Church and School Annex to harm their setting or significance.

58 The development would be visually prominent in views of local heritage assets 184 to 192 Drummond Street and 40 to 46 Stanhope Street and 7 to 15 William Road; however, whilst visible, the development is would not harm the significance of

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/draft-fire-safety-guidance-pre-consultation-information-only>

these assets because the base of the building, with its sensitively designed proportions, heights and chamfered setbacks, relates well to these nearby properties.

59 As such, GLA officers are of the view that no harm would be caused to the setting and significance of the above designated heritage assets as described above. As such, the development would be in line with London Plan Policy.

Inclusive access

60 London Plan Policy D3 seeks to ensure that new development achieves the highest standards of accessible and inclusive design. The inclusive access arrangements within the scheme should be set out clearly in the Design and Access Statement and demonstrate that the proposed public realm and buildings can be entered and used safely, easily and with dignity by all and is convenient and welcoming for all users, without creating any barriers to access. Three units within the development are proposed as accessible with a further nine provided as adaptable (exceeding policy requirements for student accommodation), level thresholds across all internal and external entrances and a range of measures are proposed to enhance accessibility across the development should be secured via condition. The accessible units should be provided at a range of outlooks and in a variety of unit sizes to ensure wheelchair users have a choice of units.

Sustainable Development

Energy

61 Based on the information provided, the non-domestic element of the proposed development it is unclear whether the development would achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The methodology should be reviewed, and the applicant should ensure that the Baseline used is the Notional from the Be Lean case, assuming communal gas boilers for heating and hot water.

62 The applicant should note that the London Plan (2021) includes a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency which applicants will be expected to meet. The applicant should therefore model additional energy efficiency measures to meet the energy efficiency target. The hot water demand is high, and the applicant should consider the potential for wastewater heat recovery.

63 The applicant is proposing a Combined Heat and Power system; however, given the scale and nature of the development this is not acceptable, as set out in Policy SI3. Alternative low carbon heating methods should be investigated and the currently proposed strategy should be revised.

64 The GLA expects all major development proposals to maximise on-site renewable energy generation, where feasible. The applicant is, therefore, required to reinvestigate the inclusion of PV and they should provide a detailed roof layout to demonstrate that PV has been maximised and demonstrate any constraints.

65 Further information in relation to energy costs, minimising overheating risk, demonstrating potential for connection to a DHN and the proposed Air Source Heat

Pump system are required. The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. Detailed comments in relation to the required additional information have been provided separately to the Council.

Flood risk

66 The southern half of the site is located above a Secondary A Aquifer, as defined by the Environment Agency (EA), which corresponds to the Lynch Hill Gravel superficial deposits. There is therefore the potential for shallow groundwater beneath the site, which should be assessed, with appropriate mitigation measures provided if necessary.

67 The Applicant should provide an assessment of sewer flood risk and provide appropriate mitigation measures against the potential for elevated groundwater beneath the site.

68 The surface water drainage strategy for the proposed development does not comply with London Plan Policy SI 13, as it does not give appropriate regard to providing a sustainable drainage solution. The following should be provided:

- Confirmation that gravity discharge from the attenuation tank to the public sewer is feasible;
- Inclusion of a range of SuDS including rainwater harvesting and green roofs;
- Maintenance plan for the proposed SuDS and attenuation features; and
- Assessment of exceedance flood flow routes for events greater than the design 1 in 100 year event plus 40% climate change.

69 Detailed comments in relation to the required information have been provided separately to the applicant and the Council

70 The Applicant should aim to achieve a maximum indoor water consumption of 105 l/person/day, which can be achieved through incorporating additional measures such as a leak detection system and rainwater harvesting and/or water recycling. The proposed development does not currently meet the requirements of London Plan Policy SI 5.

Circular Economy

71 London Plan objective GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the Mayor's aim for London to be a zero-carbon city by 2050. Policy D3 of the London Plan further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy.

72 As such, and in line with London Plan Policy SI7, a Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste. The pre-consultation draft of the Circular Economy Statements Guidance (March 2020) provides further information on how to prepare a Circular Economy Statement and is available on the GLA website.

Whole Life-Cycle Carbon

73 London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. A Whole Life-Cycle Carbon template (produced by the GLA) should be completed in accordance with the assessment guidance. The applicant should use these tools as the design progresses to calculate and reduce WLC emissions against the GLA's benchmarks provided in the guidance. The assessment guidance and template are available on the GLA website [here](#)³. The WLC Assessment must be provided prior to Stage 2.

Transport

Active Travel Zone (ATZ), Healthy Streets and Vision Zero

74 Public realm improvements works are proposed including the removal of the existing vehicle crossover on William Road and the reinstatement of the pedestrian footway.

75 The footway alterations and wider public realm works are supported in line with Policy D8 of the London Plan. An independent road safety audits and risk assessments should be undertaken in respect of these works. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The applicant should also consider the recommendations of the stage 1 safety audit for the final design.

76 Further clarification of what local streetscape improvements can be delivered via Section 278 (S278) to support Healthy Streets and active travel should be provided. This includes the A400 Hampstead Road bus reliability and road safety improvements identified in the Transport Assessment (TA). The TA has identified collision clusters at the junction of Drummond Street and Hampstead Road. The applicant should consider measures to mitigate any future safety risk and deliver measures accordingly.

Car Parking

77 The scheme's proposal as a car-free development is in line with the Mayor's Transport Strategy, Vision Zero and Healthy Streets. However, Policy T6.1 of the London Plan requires residential development proposals delivering ten or more units to deliver at least one designated disabled persons parking bay for 3% of dwellings (1 space), and further demonstrate provision for an additional 7% for further demand. Commercial floorspace should also have access to at least one space.

78 In order to satisfy the above policy, the applicant and Council should confirm that there is adequate capacity within proximity of the site. It should be noted that additional on-street blue badge parking on the TLRN in the vicinity cannot be provided.

³ <https://consult.london.gov.uk/whole-life-cycle-carbon-assessments>

Cycle Parking

79 The applicant proposes 180 long stay spaces and 8 short stay spaces for 239 student accommodation rooms, 20 long stay and 3 short stay spaces for the affordable workspaces, and re-provision of the existing residential cycle spaces of 12 long stay spaces. This is in line with London Plan Policy T5 Table 10.2. The additional student short stay provision of 20% in line with the Council's standards for larger bikes in association with accessible rooms. The applicant should also consider the parking provision of e-cargo bikes.

80 The majority of residential long stay cycle parking is proposed in the basement. The applicant is advised to make some internal design changes to improve usability and accessibility. All ground floor cycle stores are provided with step-free access and power assisted 1250mm leaf doors. Due to site constraints, the applicant has not proposed short-stay accessible spaces. The applicant should therefore seek to provide accessible short stay accessibility within the site's vicinity.

81 The applicant should consider how the development will support the strategic vision of the London wide cycle network including connecting local cycle routes and cycle hubs to encourage active travel in line with Policy T1 of the London Plan and the Mayor's Transport Strategy.

82 The applicant advises that they have followed Camden Council's cycle space standards for two-tiers, Sheffield and folding bike lockers. In addition, the applicant should clarify how they are meeting the London Cycle Design Standards (LCDS), for all cycles. The detailed design and delivery of all cycle parking should be secured by condition.

Trip generation and impacts

83 The approach to the trip generation assessment is acceptable; however, the applicant should clarify the daily profile of trips, as they would be expected to reflect resident commuting patterns in the morning peak.

Travel demand management

84 The commitment to a student and commercial travel plan should be suitably secured by condition. Mitigation may be required during student moving in/out periods for the potential increase of activity on the network. Further discussion is required with TfL officers to establish the appropriate approach for this.

Delivery Servicing and construction logistics

85 A delivery and servicing plan (DSP) has been submitted in support of the application, setting out measures to minimise and manage the impact of servicing movements. The proposal estimates 6-7 deliveries daily. TfL encourage the applicant inclusion of e-cargo bikes delivery into their delivery servicing plan. The final DSP should be secured by condition.

86 An outline Construction Logistics Plan has been submitted. Construction access will be from Hampstead Road, which TfL notes is also the route that HS2 related HGV traffic will also use. In addition, an updated Road Safety Audit (RSA) is

required as construction access uses the William Road junction with a Street Space Cycle space scheme on Hampstead Road and considering the collision data for Drummond Street and Hampstead Road. The RSA must address pedestrians/cyclists' safety around the site, particularly the northbound direction on Hampstead Road when vehicles are exiting the site.

87 The site is constrained, surrounded by neighbouring properties and the TLRN. As such, careful management of the construction period will be required and a full Construction Logistics Plan will need to be submitted for approval by TfL and the Council prior to commencement.

88 TfL expects a commitment to Direct Vision and Fleet Operators Recognition Scheme accreditation for all vehicles of at least Silver and Gold rating.

Local planning authority's position

89 Camden Council officers are currently assessing the application, a committee date has not been determined.

Legal considerations

90 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. Article 6 or 7 directions are considered against the requirements of the 2008 Order and are not made at the request of the applicant or any other party.

Financial considerations

91 There are no financial considerations at this stage.

Conclusion

92 London Plan policies on student accommodation, design, heritage, access, energy, and transport are relevant to this application. The application is broadly supported in strategic planning terms, but the following matters should be addressed to ensure full compliance with the London Plan:

- **Principle of development:** The principle of a student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace is acceptable and complies with Policies E1, H15 and H16, subject to student accommodation and affordable workspace being appropriately secured.

- **Student accommodation:** 35% of the student bedrooms would be affordable, in line with the London Plan and Fast Track Route criteria, set out in Policy H15. A S106 obligation to enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured.
- **Urban design and heritage:** The layout, design, public realm, and architectural quality of the scheme is supported. The site is not identified In Camden's Local Plan as suitable for tall buildings. No harm is identified to nearby heritage assets.
- **Sustainable Development:** The combined heat and power system is not acceptable and the wider heating strategy should be revised. Further information in relation to energy efficiency, energy costs, minimising overheating risk, potential for connection to a DHN and the proposed Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes of CO2 and the associated carbon offset payment that will be made to the borough. Further information is sought on flood risk. A Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste.
- **Transport:** The proposed development would be car-free, but arrangements for disabled persons car parking should be confirmed. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided.

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APPENDIX 8 – GLA STAGE 1 REPORT

planning report 2020/6844/S1

8 March 2021

17-37 William Road

in the London Borough of Camden

planning application no. 2020/5473/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment to deliver a 15 storey (plus basement) building to provide 239 student bed spaces together with commercial floorspace at ground floor level and associated works.

The applicant

The applicant is **Euston One Limited**, and the architect is **Morris + Company**.

Strategic issues

Principle of development: The principle of student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace complies with Policies E1, H15 and H16, subject to securing student accommodation and affordable workspace (paragraphs 14-23).

Student accommodation: 35% of the student bedrooms would be affordable, in line with the Publication London Plan and Fast Track Route criteria. A S106 obligation to enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured (paragraphs 24-27).

Urban design and Heritage: The layout, design, public realm, and architectural quality of the scheme is supported. The site is not identified in Camden's Local Plan as suitable for tall buildings. Having regard to the townscape assessment, the height of the proposed development can be supported. No harm is identified to nearby heritage assets (paragraphs 28-60).

Sustainable Development: CHP is not supported, and the wider heating strategy should be revised. Further information relating to energy efficiency, energy costs, overheating, potential for a DHN connection and the Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes and the associated carbon offset payment. Further information is sought on flood risk. A Circular Economy Statement should be submitted (paragraphs 61-73).

Transport: The proposed car free residential-led development is supported in principle. Disabled persons car parking provision should be confirmed. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided (paragraphs 74-88).

Recommendation

That Camden Council be advised that, whilst the proposal is supported in principle, the application does not currently comply with the London Plan and Publication London Plan, for the reasons set out in paragraph 92 of this report.

Context

1 On 27 November 2020 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Category of the Schedule to the Order 2008:

- 1C(c) *"building is more than 30 metres high and is outside the City of London."*

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA's website ([link here](#))¹.

Site description

5 The site constitutes a parcel of approximately 0.2 hectares of land bound by William Road to the north, Stanhope Street to the west, four storey commercial development to the east, and a mixture of three and four storey residential buildings to the south. The application site is divided into two development plots. Plot A, on the corner of William Street and Stanhope Street, is presently occupied by a mid-20th century vacant office building (B1 use) ranging two to six storeys in height. Plot B, on the eastern portion of the site, is presently occupied by an early 21st century building of seven storeys in height. The building on Plot B presently contains unoccupied office floorspace at ground floor (B1 use), and residential flats (C3 use) on upper floors. All of this housing is currently affordable. The site is within the Central Activities Zone, Central London Area, and Euston Opportunity Area.

6 The development site is bound by Stanhope Street to the west and A295 William Road to the north, both part of Camden's highway network. The A400 Hampstead Road which forms part of the Transport for London Road Network (TLRN) is 70 metres to the east. The nearest section of the Strategic Road Network is the A400 Tottenham Court Road, approximately 250 metres south.

7 The site has a highest Public Transport Access Level (PTAL) rating of 6b, which is excellent. The site is within walking distance of Regents Park, Euston Square, Warren Street and Euston which provide access to London Underground, London Overground and National Rail services. 3 bus stops within 500m of the site provide access to 13 bus routes.

¹ <https://gla.force.com/pr/s/>

8 The site itself does not contain any designated heritage assets; however, there are heritage assets in the vicinity, including the Grade I listed Regent's Park; Grade II listed 48-52 Stanhope Street, 190-204 (even) North Gower Street and St Mary Magdalene Church and School Annex; and locally listed 184 to 192 Drummond Street, 40-46 Stanhope Street and 7-15 William Road. The site also sits outside but in the vicinity of the Camden Conservation Area. Additionally, the site lies within two protected views as identified in the London View Management Framework (LVMF): the background wider setting consultation area of view 5A.2 from Greenwich Park to St. Paul's Cathedral and the landmark viewing corridor of view 2A.2 from Parliament Hill Summit looking toward the Palace of Westminster.

Details of the proposal

9 The proposed development seeks to demolish the existing building on Plot A and convert the ground floor of Plot B to provide a new building ranging in height up to 15 storeys providing:

- 1,255 sqm of affordable workspace;
- Student accommodation (239 student bed spaces) on the upper floors of Plot A;
- Public realm improvements to William Road and Stanhope Street; and
- Retention of existing affordable homes on upper floors of Plot B.

Case history

10 A pre-application meeting was held with the GLA on 5 May 2020. GLA officers advised that the principle of redeveloping the site with a mixed-use scheme delivering student accommodation and commercial space is supported in the Central Activities Zone (CAZ) and Euston Opportunity Area. Officers sought justification for any loss of office floorspace in the CAZ and that the applicant should ensure that the issues raised regarding affordable housing, urban design, heritage, sustainability, and transport be fully addressed prior to the submission of any planning application.

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Camden Local Plan 2017 and the London Plan (2021).

12 The following are relevant material considerations:

- National Planning Policy Framework (2019) and National Planning Practice Guidance; and
- Euston Area Plan (2015).

13 The relevant strategic issues and corresponding policies are as follows:

- | | |
|---------------------------|--|
| • Land use principles | <i>London Plan</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG;</i> |
| • CAZ | <i>London Plan;</i> |
| • Opportunity Areas | <i>London Plan;</i> |
| • Urban design | <i>London Plan; Character and Context SPG;</i> |
| • Heritage | <i>London Plan;</i> |
| • Inclusive access | <i>London Plan; Accessible London SPG;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy.</i> |

Principle of development

Office and employment use

14 Policy E1 of the London Plan (2021) seeks improvements to the quality, flexibility and adaptability of office space at varying sizes within the Central Activities Zone, alongside increases to the overall quantum of available office stock.

15 The existing application site presently provides 3,693 sq.m. of commercial floorspace, of which 2,266 sq.m is office accommodation and 1,427 sq.m is basement level ancillary and storage space, although it is noted that the office floorspace is presently unoccupied and has been since 2018. By contrast, the proposed scheme would deliver 1,255 sq.m. of new flexible office (B1) floorspace, which represents a net loss of 2,438 sq.m. of total commercial floorspace (1,011 sq.m of office accommodation) compared with the existing situation.

16 Notwithstanding the broad policy objectives to increase the provision of office floorspace within the Central Activities Zone; Policy E1(l) of the London Plan provides scope for the redevelopment, intensification and change of use of surplus office space to other uses (including housing), subject to consideration of the need for a range of suitable workspace including small units, flexible and affordable work spaces. In this respect, it is noted that all of the proposed 1,255 sq.m. of new office floorspace is proposed to be 'affordable workspace' and would include a range of flexible and divisible units suitable for a range of tenants including Small and Medium Enterprises (SMEs).

17 The office floorspace has been vacant since 2018 and unsuccessfully marketed since 2019, as set out in the supporting Marketing and Demand report. The site is deemed an undesirable location given its poor quality and the abundance of available office space of differing quality and size in the immediate vicinity and the wider CAZ area. The site is deemed no longer required by the market and as such, it is accepted that there is no reasonable prospect of the office building being used for business purposes.

18 The development would introduce 1,255 sq.m of affordable employment floorspace in Class B1 use which would be provided as managed workspace or incubator space suitable and flexibly designed for start-up and small and medium sized businesses. The details of the affordable workspace offer in terms of rental discount, management and timescale should be clarified and secured via Section 106 agreement.

19 The office accommodation proposed within the scheme complies with the strategic planning policies and objectives relating to the CAZ, opportunity areas, office floorspace and affordable and SME workspace as set out in the London Plan and would make a positive contribution towards the local employment offer and the objectives of the Euston Area Plan.

Student accommodation

20 Policy H15 of the London Plan (2021) requires Councils to ensure that local and strategic need for purpose-built student accommodation (PBSA) is addressed. Paragraph 4.15.5 of the London Plan, in support of Policy H15, stipulates that in order to be considered Purpose Built Student Accommodation (PBSA), student accommodation must either be operated directly by a higher education provider or have a nomination agreement with one or more higher education providers in place from initial occupation (and secured for the duration of occupation for this purpose). Policy H15 further states that PBSA should be developed in locations that are well connected local services by walking, cycling and public transport and should contribute to a mixed and inclusive neighbourhood.

21 The site is highly accessible, owing to its location within the CAZ, being within walking distance of a number of higher education institutions including University College London, SOAS, University of Westminster, Birkbeck University and the Royal Academy of Dramatic Art and the proposals have been informed by the requirements of the intended student accommodations operator with whom the applicant is in discussions.

22 The applicant proposes to restrict the occupation of the student accommodation to full-time students from local higher education institutions only through a s106 planning obligation. As per paragraph 4.15.5 of the London Plan, failure to demonstrate that the accommodation has been secured for use by students and secured through a nomination agreement with a higher education provider would result in the development being assessed under Policy H16 of the London Plan on large-scale purpose-built shared living. Proposals for large-scale purpose-built shared living will need to make an affordable housing contribution in the form of a payment in lieu. Affordable housing is discussed in further detail below.

Conclusion – Principle of development

23 In summary, the principle of the mixed-use redevelopment of the site to provide student accommodation, and affordable workspace is acceptable in accordance with Policies E1, H15 and H16, subject to the proposed affordable workspace and student accommodation being appropriately secured.

Student accommodation

24 London Plan Policy H15 specifies that purpose-built student accommodation schemes, which provide a minimum 35% affordable student accommodation and meet the definition of affordable accommodation set out in Policy H15, are eligible to follow the Fast Track Route. Such applications are not required to submit viability information to the GLA and are also exempt from a late stage review mechanism. All affordable bedrooms should accord with the definition of affordable student accommodation set out in paragraph 4.15.8 of the London Plan and as per paragraph 4.15.10 these rooms should be distributed across the various unit sizes proposed.

25 The development would provide 84 affordable student bedspaces, representing 35% of the total student accommodation provision. The applicant has stated that the affordable bedspaces 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. As such, subject to the rental level being secured at levels set out in the AMR, and the requirements with regard to nominations set out above, the application would comply with the requirements of Policy H15 and the scheme could be considered eligible for the Fast Track Route.

26 The applicant has stated that the exact affordable bedspaces are yet to be agreed with the Council, but that all occupants will benefit from access to the same communal spaces and facilities within the development. Whilst this is supported, to ensure that a range of unit sizes are provided as affordable, the S106 agreement should secure a fair distribution of affordable units across the range of unit sizes within the development.

27 In summary, the proposed student accommodation proposals comply with the London Plan, subject to the affordable student accommodation and nominations arrangements being appropriately secured.

Urban design

28 Good design is central to all objectives of the London Plan. Policies contained within chapter 3 of the London Plan set out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

Site layout and public realm

29 The site occupies the full depth of both blocks, with the commercial frontages at ground floor level. A new recessed student housing entrance is proposed onto Stanhope Street and series of full height glazed commercial entrances and frontages associated with the affordable workspace are proposed along William Road. The design and layout of the lower levels of the scheme are well-considered and creates a more active and pedestrian friendly environment. Public realm enhancements are proposed in the form of new planters, hard landscaping and street trees, providing an enhanced pedestrian experience.

Height and massing

30 London Plan Policy D9 seeks to ensure that tall buildings are appropriately located, well designed and able to enhance their immediate and wider settings. This Policy specifically states that tall buildings should only be developed in locations that are identified as suitable in development plans and that proposals should address visual, functions, environmental and the cumulative impacts of tall buildings.

31 The site is located within the Central Activities Zone and the Euston Opportunity Area and is within a highly accessible location relative to public transport (PTAL 6b), local services and higher education institutions. Further to this, the site is located in an area with a number of tall buildings, notably existing towers to the west and commercial development to the south and the emerging development around Euston Station to the east. However, the site is not in a location that is identified as suitable for a tall building, as Camden's Local Plan considers all parts of the borough as sensitive to the development of tall buildings. Therefore, whilst there are various characteristics of this site that offer material considerations for developing a tall building on the site, as noted above, this is a location that the local plan envisages as sensitive to tall buildings. Noting that London Plan Policy D9 states that tall buildings should only be developed in locations that are identified in development plans, it falls to officers to consider whether there might be material considerations that could justify a tall building at this site. Key to this exercise will be a robust assessment of the impact of the proposed tall building against the criteria within London Plan Policy D9, in conjunction with consideration of the public benefits of the proposal.

Visual impacts

32 The development is composed of a 5-storey podium and 15-storey tower element situated at the corner of William Road and Stanhope Street. The development represents a significant step change from the prevailing height of immediately adjoining properties within the urban block and means that the proposal would be visible from various locations within the vicinity. The applicant has undertaken an analysis of the surrounding built character and townscape as well as making the case of landmarking the site on the alignment of key routes towards Euston, Regents Park and Central London.

33 Since pre-application stage, the development has been reduced in height from 17 to 15 storeys. GLA officers consider that this relates well to the surrounding context/hierarchy of tall buildings, mediating between large scale commercial buildings on Euston Road, the nearby estate towers and the finer grain 'shoulder' buildings along Stanhope and William Rd.

34 The height reduction positively affects the scheme's relationship with the protected vistas as set out in further details below. At ground floor level, as noted above, the building maintains the pedestrian scale and character and enhances vitality through the introduction of active frontage.

35 The supporting Townscape, Visual and Built Heritage Assessment which includes accurate visual representations of the proposal from various important local viewpoints and includes an assessment of heritage impact. Having considered this, and notwithstanding the assessment of the impact of the proposals on heritage

assets which must be read in the context of paragraphs 194 & 195 of the NPPF and is addressed in full below, GLA officers are of the view that the development would make a positive contribution in immediate views, through the replacement of the existing poor quality building, and to the local townscape and skyline, through the development of a building of high architectural quality.

Functional impacts

36 The building has been well designed to accommodate the functional requirements of the proposed uses. The ground floor commercial space is flexible and capable of operating in a range of configurations. The standard of student accommodation is high and includes high quality access from street level (at prominent corner), with generous and welcoming lobby space, well designed interiors to units, and excellent amenity space offer (particularly at roof level). As noted above, the site is in an area of excellent accessibility and is within walking and cycling distances of a number of universities. As considered below, the development is supported by a fire strategy.

Environmental impacts

37 In terms of local microclimate, the impact of the building on wind and pedestrian comfort levels within the proposed public spaces at ground floor level and amenity spaces above was considered in the assessment submitted in support of the application. The assessment concludes that environment in all areas are suitable for their intended uses both from a Pedestrian Wind Comfort and a Safety perspective. GLA officers do not anticipate any significant wind microclimate issues in pedestrian areas surrounding the site.

38 The impact of the building on daylight and sunlight to the surrounding residential context has been assessed and modelling findings have fed into the design of the building. The assessment concludes that the development would have some impact but that this would be within acceptable parameters given the urban context of the site. Camden Council should undertake a full review of the environmental impacts as part of their assessment of the proposal as local planning authority. GLA officers will work with the Council to ensure that any necessary environmental mitigation measures would be appropriately secured.

Cumulative impact

39 Schafer House to the south represents the only other student accommodation within the immediate surrounding area. Having considered supporting technical assessments and reports and subject to the consideration of transport matters set out below, the development is not anticipated to give rise to cumulative functional impact on local amenity. The submitted Townscape, Visual and Built Heritage Assessment includes wireline visualisations of other consented development in the relevant long-range view allowing for an assessment of cumulative townscape and heritage impact. Having considered this, in conjunction with the assessment of strategic planning issues contained within this report, GLA officers are satisfied that there are no residual cumulative impacts of significance in strategic planning terms.

Conclusion - Height

40 Whilst GLA officers consider there may be material considerations that justify a tall building on the site, subject to the additional information requested above, the site is not located within an area identified for tall buildings and is therefore not in compliance with Policy D9. The applicant should engage closely with the Council on matters of neighbourhood amenity and local mitigation and ensure that the matters raised in the urban design and sustainable development sections of this report are appropriately addressed.

Strategic Views

41 London View Management Framework (LVMF) Protected Vistas 2A.2 and 2B.1 from Parliament Hill to the Palace of Westminster World Heritage Site, 4A.1 from Primrose Hill to St Pauls Cathedral and 5A.2 from Greenwich Park have been assessed as part of the applicant's Townscape Visual and Built Heritage Assessment (TVBHA).

42 The verified views assessment demonstrates that, whilst the development would be visible in the landmark viewing corridor of assessment point 2A.2, and would rise above the threshold plane in this view, it would be viewed in the context of the broader context, particularly the taller development at 10 Brock Street. The development would be visible in views from LVMF assessment point 2B.1 but this would be outside the landmark viewing corridor and at a scale that would not impact on the skyline. As such, in both views the development would not impact on the background setting or protected silhouette of the Palace of Westminster World Heritage Site or its overall value and significance.

43 Whilst visible in the protected vista 4A.1 from Primrose Hill to St Pauls Cathedral, the development would be well outside the landmark viewing corridor on the periphery of the view, would not break the distant ridge line beyond, and would not alter a viewer's ability to recognise or appreciate the strategic landmark in this view. The proposal would, as such, not harm the characteristics and composition of the view or the ability to appreciate St Paul's Cathedral from Primrose Hill. The views assessment demonstrates that the proposals would not be largely obscured from in the LVMF 5.A1 from Greenwich Park view and as such and would not impact view or ability to appreciate St Paul's Cathedral.

44 GLA officers concur with the applicant's assessment and therefore the application complies with London Plan Policies HC2, HC3, and HC4, which relate to the London View Management Framework and World Heritage Sites.

Architecture

45 London Plan Policy D4 instructs that tall buildings must undergo a process of enhanced design scrutiny in the form of a transparent design review conducted by independent experts. In accordance with this policy the proposals were presented to Camden's Design Review Panel (DRP) in September of 2020. While the DRP was supportive of the quality of architectural expression, internal views and materiality, it found the proposals to be over scaled and the provision of public realm lacking. The applicant should continue to work to resolve the issues raised by the DRP.

46 The architecture has evolved with thorough contextual analysis and the resulting building proportions and façade articulation are very successful and aligned with requirements of London Plan design policies. Notwithstanding the principle point concerning the suitability of this site for a tall building from a planning policy perspective, GLA officers are of the view that the massing, design and materiality of the proposal has been well-considered in design terms, having regard to its immediate and wider context. The building would be visually distinctive in medium and local views with ordered and textured concrete and brick facades which successfully convey a sense of human scale.

47 The application includes a good level of detail on the finer building details of the façade articulation (window reveals, entrances and roof lines) and materials, detail which should be secured by condition. Overall, GLA officers are of the view that the proposed building represents high quality architecture. The Council should secure key materials by condition to ensure the scheme is of the high quality envisioned.

Quality of student accommodation

48 London Plan Policy H15 also requires purpose-built student accommodation to provide adequate functional living space for students in terms of the design and layout of bedrooms. Whilst there are no space standards for student accommodation, the Design and Access Statement should set out the range of unit types proposed and their size and access to communal facilities to enable GLA officers to undertake a qualitative assessment of the proposals. The current layout proposes a mix of studios and dual-occupancy units with two single bedrooms sharing communal kitchens and bathroom facilities. The standard of student accommodation is very high and includes high quality access from street level (at prominent corner), with generous and welcoming lobby space, well designed interiors to units, and excellent amenity space offer (particularly at roof level).

49 Whilst the proportion of single aspect north facing units would not be acceptable within a self-contained housing scheme, the arrangement proposed does not raise any particular strategic planning concerns in this particular instance, given the short-term nature of tenancies. This does, however, further highlight the need for well-designed communal facilities.

50 The success of the proposed amenity spaces is also subject to appropriate management and maintenance. Accordingly, management and maintenance plans should be secured within a Section 106 agreement. Measures to mitigate privacy impacts from within the courtyard to the residential dwellings, including high-quality landscaping and defensible spaces should also be secured.

Fire safety

51 In line with London Plan Policy D12, development proposals must achieve the highest standards of fire safety and demonstrate how they would achieve the highest standards of fire safety including details of construction methods and materials, means of escape, fire safety features, and means of access for fire service personnel. Additionally, Policy D5 seeks to ensure that all developments provide for a safe and dignified emergency evacuation for all users. To this end, in all developments where lifts are installed at least one lift per core (or more subject to capacity assessments)

should be a suitably sized fire evacuation lift to be used to evacuate people who require level access from buildings.

52 The proposals include an Outline Fire Strategy developed by a specialist fire consultant; however, it does not fully address the matters noted above and therefore does not yet fully comply with policy. The applicant should review the Draft Fire Safety Guidance available on the GLA website ([link here](#))² and amend the strategy to meet these requirements. A fire statement that comprehensively addresses the requirements of London Plan Policies D12 and D5 should be secured by the Council.

Heritage

53 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to conservation areas, for all planning decisions “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In relation to listed buildings, all planning decisions should ‘should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.

54 Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. In line with case law, any harm identified must be given considerable importance and weight.

55 Paragraph 189 of the NPPF further specifies that in determining applications, local planning authorities should require an applicant to describe the significance of any affected heritage assets, including any contribution made by their setting.

56 The applicant’s TVBHA demonstrates that the development is not likely to harm the setting of the Regent’s Park, a Grade I listed park and Conservation Area or the listed buildings therein or the Camden Town Conservation Area with the verified views assessment showing that the building would largely be screened by trees in summer and intervening development from the selected view points within the park and from southward views along Mornington Crescent. Where visible, the development would be of a scale, position and relationship to intervening development to not cause harm to character or appearance of the conservation areas.

57 On consideration of the assessment undertaken in the TVBHIA, GLA officers are of the view that the proposal is not of a scale, height and proximity to the Grade II listed buildings at 48-52 William Road, 190-204 (even) North Gower Street and St Mary Magdalene Church and School Annex to harm their setting or significance.

58 The development would be visually prominent in views of local heritage assets 184 to 192 Drummond Street and 40 to 46 Stanhope Street and 7 to 15 William Road; however, whilst visible, the development is would not harm the significance of

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/draft-fire-safety-guidance-pre-consultation-information-only>

these assets because the base of the building, with its sensitively designed proportions, heights and chamfered setbacks, relates well to these nearby properties.

59 As such, GLA officers are of the view that no harm would be caused to the setting and significance of the above designated heritage assets as described above. As such, the development would be in line with London Plan Policy.

Inclusive access

60 London Plan Policy D3 seeks to ensure that new development achieves the highest standards of accessible and inclusive design. The inclusive access arrangements within the scheme should be set out clearly in the Design and Access Statement and demonstrate that the proposed public realm and buildings can be entered and used safely, easily and with dignity by all and is convenient and welcoming for all users, without creating any barriers to access. Three units within the development are proposed as accessible with a further nine provided as adaptable (exceeding policy requirements for student accommodation), level thresholds across all internal and external entrances and a range of measures are proposed to enhance accessibility across the development should be secured via condition. The accessible units should be provided at a range of outlooks and in a variety of unit sizes to ensure wheelchair users have a choice of units.

Sustainable Development

Energy

61 Based on the information provided, the non-domestic element of the proposed development it is unclear whether the development would achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The methodology should be reviewed, and the applicant should ensure that the Baseline used is the Notional from the Be Lean case, assuming communal gas boilers for heating and hot water.

62 The applicant should note that the London Plan (2021) includes a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency which applicants will be expected to meet. The applicant should therefore model additional energy efficiency measures to meet the energy efficiency target. The hot water demand is high, and the applicant should consider the potential for wastewater heat recovery.

63 The applicant is proposing a Combined Heat and Power system; however, given the scale and nature of the development this is not acceptable, as set out in Policy SI3. Alternative low carbon heating methods should be investigated and the currently proposed strategy should be revised.

64 The GLA expects all major development proposals to maximise on-site renewable energy generation, where feasible. The applicant is, therefore, required to reinvestigate the inclusion of PV and they should provide a detailed roof layout to demonstrate that PV has been maximised and demonstrate any constraints.

65 Further information in relation to energy costs, minimising overheating risk, demonstrating potential for connection to a DHN and the proposed Air Source Heat

Pump system are required. The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. Detailed comments in relation to the required additional information have been provided separately to the Council.

Flood risk

66 The southern half of the site is located above a Secondary A Aquifer, as defined by the Environment Agency (EA), which corresponds to the Lynch Hill Gravel superficial deposits. There is therefore the potential for shallow groundwater beneath the site, which should be assessed, with appropriate mitigation measures provided if necessary.

67 The Applicant should provide an assessment of sewer flood risk and provide appropriate mitigation measures against the potential for elevated groundwater beneath the site.

68 The surface water drainage strategy for the proposed development does not comply with London Plan Policy SI 13, as it does not give appropriate regard to providing a sustainable drainage solution. The following should be provided:

- Confirmation that gravity discharge from the attenuation tank to the public sewer is feasible;
- Inclusion of a range of SuDS including rainwater harvesting and green roofs;
- Maintenance plan for the proposed SuDS and attenuation features; and
- Assessment of exceedance flood flow routes for events greater than the design 1 in 100 year event plus 40% climate change.

69 Detailed comments in relation to the required information have been provided separately to the applicant and the Council

70 The Applicant should aim to achieve a maximum indoor water consumption of 105 l/person/day, which can be achieved through incorporating additional measures such as a leak detection system and rainwater harvesting and/or water recycling. The proposed development does not currently meet the requirements of London Plan Policy SI 5.

Circular Economy

71 London Plan objective GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the Mayor's aim for London to be a zero-carbon city by 2050. Policy D3 of the London Plan further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy.

72 As such, and in line with London Plan Policy SI7, a Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste. The pre-consultation draft of the Circular Economy Statements Guidance (March 2020) provides further information on how to prepare a Circular Economy Statement and is available on the GLA website.

Whole Life-Cycle Carbon

73 London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. A Whole Life-Cycle Carbon template (produced by the GLA) should be completed in accordance with the assessment guidance. The applicant should use these tools as the design progresses to calculate and reduce WLC emissions against the GLA's benchmarks provided in the guidance. The assessment guidance and template are available on the GLA website [here](#)³. The WLC Assessment must be provided prior to Stage 2.

Transport

Active Travel Zone (ATZ), Healthy Streets and Vision Zero

74 Public realm improvements works are proposed including the removal of the existing vehicle crossover on William Road and the reinstatement of the pedestrian footway.

75 The footway alterations and wider public realm works are supported in line with Policy D8 of the London Plan. An independent road safety audits and risk assessments should be undertaken in respect of these works. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The applicant should also consider the recommendations of the stage 1 safety audit for the final design.

76 Further clarification of what local streetscape improvements can be delivered via Section 278 (S278) to support Healthy Streets and active travel should be provided. This includes the A400 Hampstead Road bus reliability and road safety improvements identified in the Transport Assessment (TA). The TA has identified collision clusters at the junction of Drummond Street and Hampstead Road. The applicant should consider measures to mitigate any future safety risk and deliver measures accordingly.

Car Parking

77 The scheme's proposal as a car-free development is in line with the Mayor's Transport Strategy, Vision Zero and Healthy Streets. However, Policy T6.1 of the London Plan requires residential development proposals delivering ten or more units to deliver at least one designated disabled persons parking bay for 3% of dwellings (1 space), and further demonstrate provision for an additional 7% for further demand. Commercial floorspace should also have access to at least one space.

78 In order to satisfy the above policy, the applicant and Council should confirm that there is adequate capacity within proximity of the site. It should be noted that additional on-street blue badge parking on the TLRN in the vicinity cannot be provided.

³ <https://consult.london.gov.uk/whole-life-cycle-carbon-assessments>

Cycle Parking

79 The applicant proposes 180 long stay spaces and 8 short stay spaces for 239 student accommodation rooms, 20 long stay and 3 short stay spaces for the affordable workspaces, and re-provision of the existing residential cycle spaces of 12 long stay spaces. This is in line with London Plan Policy T5 Table 10.2. The additional student short stay provision of 20% in line with the Council's standards for larger bikes in association with accessible rooms. The applicant should also consider the parking provision of e-cargo bikes.

80 The majority of residential long stay cycle parking is proposed in the basement. The applicant is advised to make some internal design changes to improve usability and accessibility. All ground floor cycle stores are provided with step-free access and power assisted 1250mm leaf doors. Due to site constraints, the applicant has not proposed short-stay accessible spaces. The applicant should therefore seek to provide accessible short stay accessibility within the site's vicinity.

81 The applicant should consider how the development will support the strategic vision of the London wide cycle network including connecting local cycle routes and cycle hubs to encourage active travel in line with Policy T1 of the London Plan and the Mayor's Transport Strategy.

82 The applicant advises that they have followed Camden Council's cycle space standards for two-tiers, Sheffield and folding bike lockers. In addition, the applicant should clarify how they are meeting the London Cycle Design Standards (LCDS), for all cycles. The detailed design and delivery of all cycle parking should be secured by condition.

Trip generation and impacts

83 The approach to the trip generation assessment is acceptable; however, the applicant should clarify the daily profile of trips, as they would be expected to reflect resident commuting patterns in the morning peak.

Travel demand management

84 The commitment to a student and commercial travel plan should be suitably secured by condition. Mitigation may be required during student moving in/out periods for the potential increase of activity on the network. Further discussion is required with TfL officers to establish the appropriate approach for this.

Delivery Servicing and construction logistics

85 A delivery and servicing plan (DSP) has been submitted in support of the application, setting out measures to minimise and manage the impact of servicing movements. The proposal estimates 6-7 deliveries daily. TfL encourage the applicant inclusion of e-cargo bikes delivery into their delivery servicing plan. The final DSP should be secured by condition.

86 An outline Construction Logistics Plan has been submitted. Construction access will be from Hampstead Road, which TfL notes is also the route that HS2 related HGV traffic will also use. In addition, an updated Road Safety Audit (RSA) is

required as construction access uses the William Road junction with a Street Space Cycle space scheme on Hampstead Road and considering the collision data for Drummond Street and Hampstead Road. The RSA must address pedestrians/cyclists' safety around the site, particularly the northbound direction on Hampstead Road when vehicles are exiting the site.

87 The site is constrained, surrounded by neighbouring properties and the TLRN. As such, careful management of the construction period will be required and a full Construction Logistics Plan will need to be submitted for approval by TfL and the Council prior to commencement.

88 TfL expects a commitment to Direct Vision and Fleet Operators Recognition Scheme accreditation for all vehicles of at least Silver and Gold rating.

Local planning authority's position

89 Camden Council officers are currently assessing the application, a committee date has not been determined.

Legal considerations

90 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. Article 6 or 7 directions are considered against the requirements of the 2008 Order and are not made at the request of the applicant or any other party.

Financial considerations

91 There are no financial considerations at this stage.

Conclusion

92 London Plan policies on student accommodation, design, heritage, access, energy, and transport are relevant to this application. The application is broadly supported in strategic planning terms, but the following matters should be addressed to ensure full compliance with the London Plan:

- **Principle of development:** The principle of a student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace is acceptable and complies with Policies E1, H15 and H16, subject to student accommodation and affordable workspace being appropriately secured.

- **Student accommodation:** 35% of the student bedrooms would be affordable, in line with the London Plan and Fast Track Route criteria, set out in Policy H15. A S106 obligation to enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured.
- **Urban design and heritage:** The layout, design, public realm, and architectural quality of the scheme is supported. The site is not identified In Camden's Local Plan as suitable for tall buildings. No harm is identified to nearby heritage assets.
- **Sustainable Development:** The combined heat and power system is not acceptable and the wider heating strategy should be revised. Further information in relation to energy efficiency, energy costs, minimising overheating risk, potential for connection to a DHN and the proposed Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes of CO2 and the associated carbon offset payment that will be made to the borough. Further information is sought on flood risk. A Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste.
- **Transport:** The proposed development would be car-free, but arrangements for disabled persons car parking should be confirmed. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided.

for further information, contact GLA Planning Unit (Development Management Team):

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APPENDIX 9 – GLA STAGE 2 REPORT

MAYOR OF LONDON

Ben Farrant
London Borough of Camden
By Email

Our ref: 2021/0304/S2
Your ref: 2020/5473/P
Date: 20 September 2021

Dear Ben Farrant

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

17-37 William Road

Local Planning Authority reference: 2020/5473/P

I refer to your correspondence of 9 September 2021 informing the Mayor that the local planning authority is minded to refuse planning permission for the above planning application. I refer you also to the notice that was dated 9 September 2021 under the provisions of article 5(1)(b)(i) of the above Order.

The Mayor has delegated his planning powers to me. Having now considered a report on this case (GLA ref: 2021/0304/S2, copy enclosed), I am content to allow the local planning authority to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to take over the application for my own determination.

Yours sincerely

A handwritten signature in black ink, reading 'Jules Pipe', with a horizontal line underneath the name.

Jules Pipe CBE

Deputy Mayor for Planning, Regeneration and Skills

Andrew Dismore
Anne Clarke, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL
David Shiels, DP9 Limited, 100 Pall Mall, London SW1Y 5NQ

17-37 William RoadLocal Planning Authority: Camden
Local Planning Authority reference 2020/5473/P**Strategic planning application stage 2 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007;
Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment to deliver a 15 storey (plus basement) building to provide 239 student bed spaces together with commercial floorspace at ground floor level and associated works.

The applicant

The applicant is **Euston One Limited**, and the architect is **Morris + Company**.

Key dates

GLA pre-application meeting: 5 May 2020

GLA stage 1 report: 8 March 2021

LPA Planning Committee decision: 2 September 2021

Strategic issues summary

Camden Council has resolved to refuse permission for this application. The Mayor must consider whether the application warrants a direction to take over determination of the application under Article 7 of the Mayor of London Order 2008.

Having regard to the details of the application, the matters set out in the Council's committee report and the Council's draft decision notice there are no sound planning reasons for the Mayor to intervene in this particular case and therefore no basis to issue a direction under Article 7 of the Order 2008.

The Council's decision

In this instance Camden Council has resolved to refuse permission.

Recommendation

That Camden Council be advised that the Mayor is content for the Council to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct that he is to be the local planning authority.

Context

1. On 27 November 2020 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under the following Category of the Schedule to the Order 2008:
 - 1C(c) “*building is more than 30 metres high and is outside the City of London.*”
2. On 8 March 2021 the Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered planning report GLA/6844/01 (report available on the GLA’s public register [here](#)) and subsequently advised Camden Council:
 - **Principle of development:** The principle of a student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace is acceptable and complies with Policies E1, H15 and H16, subject to student accommodation and affordable workspace being appropriately secured.
 - **Student accommodation:** 35% of the student bedrooms would be affordable, in line with the London Plan and Fast Track Route criteria, set out in Policy H15. A S106 obligation to enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured.
 - **Urban design and heritage:** The layout, design, public realm, and architectural quality of the scheme is supported. The site is not identified in Camden’s Local Plan as suitable for tall buildings. No harm is identified to nearby heritage assets.
 - **Sustainable Development:** The combined heat and power system is not acceptable and the wider heating strategy should be revised. Further information in relation to energy efficiency, energy costs, minimising overheating risk, potential for connection to a DHN and the proposed Air Source Heat Pump system are required. The applicant should confirm the carbon shortfall in tonnes of CO₂ and the associated carbon offset payment that will be made to the borough. Further information is sought on flood risk. A Circular Economy Statement should be submitted to demonstrate how the proposals promote circular economy outcomes and aim to be net zero-waste.
 - **Transport:** The proposed development would be car-free, but arrangements for disabled persons car parking should be confirmed. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided.
3. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report.
4. On 2 September 2021, Camden Council decided that it was minded to refuse permission for the application and on 9 September 2021, the Stage 2 referral was validated.

5. Under the provisions of Article 5 of the 2008 Order the Mayor may allow the draft decision to proceed unchanged; or, issue a direction to Camden Council under Article 7 that he is to act as the local planning authority for the purposes of determining the application or any connected application.
6. Camden Council's draft decision notice includes the following reasons for refusal:
 - The proposed development, due to the failure to provide adequate replacement employment space on the site, would fail to support growth in economic activity in Camden and result in the loss of employment opportunities within the borough contrary to Policies E1 (Economic development) and E2 (Employment premises and sites) of the London Borough of Camden Local Plan 2017.
 - The proposed development, by virtue of its height, mass, scale and footprint, would be detrimental to the streetscene, setting of the nearby listed buildings and the character and appearance of the wider area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
 - The proposed development, due to its height, massing, scale and location, would result in a material loss of light and outlook as well as having an overbearing impact and an increased sense of enclosure on the occupiers of Winchester Apartments and users of Netley Primary School's external amenity space, contrary to policy A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.
 - A number of the student accommodation units within the proposed development, by reason of their poor levels of outlook, light, internal space, accessibility, external amenity space and ventilation, would fail to provide adequate internal living conditions for future occupiers, resulting in substandard accommodation contrary to policies D1 (Design), A1 (Managing the impact of development) H6 (Housing choice and mix) and H9 (Student housing) of the London Borough of Camden Local Plan 2017.
 - The proposed development, in the absence of a legal agreement to secure a car-free development, would be likely to contribute unacceptably to parking stress, environmental impacts and congestion in the surrounding area, contrary to policies T1 (Prioritising walking, cycling and public transport), T2 (Parking and car-free development), CC1 (Climate change mitigation) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
 - The proposed development, in the absence of a legal agreement to secure an appropriate financial contribution towards public highway works, would be likely to harm the Borough's transport and public realm infrastructure, contrary to policies T1 (Prioritising walking, cycling and public transport), T3 (Transport Infrastructure), A1 (Managing the impact of development) and DM1 (Delivery and monitoring) of London Borough of Camden Local Plan 2017.
 - The proposed development, in the absence of a legal agreement to secure financial contributions towards pedestrian, cyclist and environmental improvements in the area, would fail to mitigate the impact of the development created by increased trips, contrary to policies T1 (Prioritising walking, cycling and public transport), A1 (Managing the impact of development) and DM1 (Delivery and monitoring) of London Borough of Camden Local Plan 2017.

- The proposed development, in the absence of a legal agreement securing an Approval in Principle Report and appropriate financial contribution towards an approval in principle would fail to mitigate the impact of the basement works on the adjacent public highway contrary to policies T3 (Transport Infrastructure) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
- The proposed development, in the absence of a legal agreement securing a Delivery and Servicing Management Plan for the commercial element, would likely give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.
- The proposed development, in the absence of a legal agreement for a Student Travel Plan, Strategic Level Travel Plan (student accommodation) and Local Level Travel Plan (affordable workspace) and financial contributions for the associated monitoring, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.
- The proposed development, in the absence of a legal agreement to secure a construction management plan, construction impact bond and a financial contribution for construction management plan monitoring, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.
- The proposed development, in the absence of a legal agreement securing a local employment and training package including an appropriate financial contribution, would be likely to lead to the exacerbation of local skill shortages and lack of training opportunities and would fail to contribute to the regeneration of the area, contrary to policies G1 (Delivery and location of growth), E1 (Economic development) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
- The proposed development, in the absence of a legal agreement securing a carbon off-set contribution; an Energy Efficiency Plan and renewable energy plan including the measures set out in the Energy Strategy; details regarding the feasibility of connecting to a decentralised energy network; and a Sustainability Plan including Design Stage and Post Construction stage BREAM assessment reports and certificates, demonstrating compliance with targets, would fail to be sustainable in its use of resources, contrary to policies CC1 (Climate change mitigation), CC2 (Adapting to climate change), CC3 (Water and flooding), CC4 (Air quality), C1 (Health and wellbeing) and DM1 (Delivery and monitoring) of the London Borough of the London Borough of Camden Local Plan 2017.

- The proposed development, in the absence of a legal agreement to secure financial contributions towards public open space, would be likely to contribute to pressure and demand on the existing open space in this area contrary to policies A2 (Open Space) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
 - The proposed development, in the absence of a legal agreement securing a student management plan, would fail to protect the amenities of the surrounding area contrary to policies A1 (Managing the impact of development) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
 - The proposed development, in the absence of a legal agreement restricting the term-time occupation of the student units to students in higher education at publicly-funded education institutions that are accessible from the development, would fail to meet the identified need for student housing in sustainable locations, and fail to provide a range of affordable, accessible and adaptable dwellings appropriate to meet wider housing needs, contrary to policies H9 (Student Housing) of the London Borough of Camden Local Plan 2017 and policy H15 (Purpose-built student accommodation) of the London Plan 2021.
 - The proposed development, in the absence of a legal agreement securing 35% or the maximum viable proportion of the student accommodation as affordable and available to students nominated by a specified education institution as needing affordable accommodation, would fail to provide a range of accommodation affordable to the student body as a whole including those with state-funded living support and recognised as in need of affordable accommodation, contrary to policy H9 (Student Housing) of the London Borough of Camden Local Plan 2017 and policy H15 (Purpose-built student accommodation) of the London Plan 2021.
7. The decision on this case, and the reasons, will be made available on the City Hall website: www.london.gov.uk

Relevant policy and guidance

8. Since consultation stage the National Planning Policy Framework (2021) has been updated and replaces the previous version published in February 2019.

Article 7: Direction that the Mayor is to be the local planning authority

9. The initial statutory test regarding the Mayor's power to take over and determine applications referred under categories 1 and 2 of the schedule to the Mayor of London Order 2008 is a decision about who should have jurisdiction over the application, rather than whether planning permission should ultimately be granted or refused.
10. The test consists of the following three parts, all of which must be met in order for the Mayor to take over the application: a. Significant impact on the implementation of the London Plan; b. Significant effects on more than one borough; and, c. Sound planning reasons for his intervention.

11. Parts (a) and (b) of the test identify the impact an application would have on the Mayor's policies and the geographical extent of the impact, whilst part (c) deals with the reasons for the Mayor's intervention, having regard to the Council's draft decision on the application. These tests are intended to ensure that the Mayor can only intervene in the most important cases.
12. This report considers the extent to which the statutory tests under Article 7(1) apply in this case and whether, therefore, the Mayor should direct that he is to be the local planning authority and apply the tests set out under Article 7(3) of the Order 2008.
13. Article 7(3) of the 2008 Order requires the Mayor, when considering whether to exercise his power to become local planning authority in respect of an application of potential strategic importance (PSI), to take account of certain matters. Where the proposed development falls within Category 1A of the Schedule to the 2008 Order, the Mayor is required to take account of the extent to which the relevant London Borough is achieving and has achieved its targets for new housing including affordable housing, and in respect of all categories of PSI application, the Mayor is required to take account of whether the London Borough is achieving and has achieved any other relevant development plan targets.

Policy Test 7(1)(a): Significant impact on the implementation of the London Plan

14. The proposals would result in an additional 239 student bedrooms. Camden's Local Plan at Policy H9 identifies a student housing target for Camden's target of 160 additional places in student housing per year. London Plan Policy H15 sets out in the reasoned justification that an overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a pan-London requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified. The scheme proposes 239 new student bedrooms, this is equivalent to 149% of Camden's annual target and 6.8% of London's annual strategic target for student bedrooms. Having regard to the published record of Camden's delivery of student bedrooms in the borough (refer below), and noting a historic trend of target exceedance, GLA officers do not consider that the proposal would amount to a significant impact on the implementation of the London Plan in terms of student housing delivery.
15. The existing application site presently provides 3,693 sq.m. of commercial floorspace, of which 2,266 sq.m is office accommodation and 1,427 sq.m is basement level ancillary and storage space, although it is noted that the office floorspace is presently unoccupied and has been since 2018. By contrast, the proposed scheme would deliver 1,255 sq.m. of new flexible office (B1) floorspace, which represents a net loss of 2,438 sq.m. of total commercial floorspace (1,011 sq.m of office provides scope for the redevelopment, intensification and change of use of surplus office space to other uses (including housing), subject to consideration of the need for a range of suitable workspace including small units, flexible and affordable work spaces. In this regard, at consultation stage, the applicant provided marketing evidence that indicated the existing office floorspace is not in demand. The loss of office floorspace accords with the criteria outlined in the employment chapter of the London Plan. On this basis, the scheme as proposed would not have a significant impact on the implementation of the London Plan in terms of employment.

Policy Test 7(1)(b): Significant effects on more than one borough

16. Whilst the site is located in close proximity to the boundary with the City of Westminster, by virtue of the context, scale and nature of the proposals the scheme would not have a significant effect on more than one borough.

Policy test 7(1)(c): Sound planning reasons for intervening

17. Part (c) of the statutory test within Article 7(1) of the 2008 Order concerns whether the Mayor considers there to be sound planning reasons to exercise his power to become local planning authority in respect of the application. Having regard to fact that the proposal has not met parts (a) and (b) of the statutory test within Article 7, the details of the proposals, including the outstanding unresolved matters from Stage 1 and the assessment of the scheme as set out in this report below, the Council's committee report and draft reasons for refusal and the Council's performance against the development plan targets as set out in paragraphs 18 to 23 below it is considered that there are no sound planning reasons to intervene in this case and test (c) has not been met.

Matters the Mayor must take into account

18. As set out in paragraph 13 above, the Mayor is required to take account of whether the London Borough is achieving and has achieved any other relevant development plan targets.

Student housing

19. The London Plan at Policy H15 sets out in the reasoned justification that an overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified. The London Plan does not break this requirement down into Borough specific targets.
20. Camden's Local Plan at Policy H9 identifies a student housing target for Camden's target of 160 additional places in student housing per year. The table below sets out student housing completions from 2013-2018.

Year	Net additional student completions	% of target
2013/14	1,205	753%
2014/15	1,161	725%
2015/16	498	311%
2016/17	248	155%
2017/18	0	0%

Figure 1: Camden's Housing trajectory summary Source: Regeneration and Planning Authority Monitoring Report 2017/18

21. Further to the above, The London Plan AMR 2018/19 sets out that Camden recorded a loss of 214 rooms for year 2018/19 due to the implementation of permission 2013/0685/P).
22. Overall Camden has performed very well against its local plan target for additional student accommodation with 2,898 net completions registered since 2013/14. This averages as 483 net completions a year in the context of its target of 160 student housing units a year.

Commercial

23. As set out above and demonstrated at consultation stage, Policy E1 of the London Plan provides scope for the redevelopment, intensification and change of use of surplus office space to other uses (including housing), subject to consideration of the need for a range of suitable workspace including small units, flexible and affordable work spaces. The office floorspace on site has been vacant since 2018 and unsuccessfully marketed since 2019, as set out in the supporting Marketing and Demand report. The loss of this under utilised office floorspace and replacement with 1,255 sq.m. of affordable workspace would not represent a significant contribution to the CAZ's strategic office provision.

Conclusion

24. For the Mayor to issue a direction that he is to be the local planning authority, all relevant statutory tests must be met. As the tests have not been met, there is no basis to issue a direction under Section 2A of the Town and Country Planning Act 1990.

Outstanding issues

25. GLA officers note that various amendments to the proposed development have been undertaken following Stage 1 referral and additional information provided, including but not limited to; carbon savings, renewable technologies, energy centre, flood risk and drainage, circular economy, whole life carbon, vehicle parking, cycle storage, trip generation and fire. However, these amendments did not overcome the Council's concerns and the application has been recommended for refusal.
26. It is noted that as the application has been recommended for refusal and a draft Section 106 has not been agreed. As such, GLA officers consider that some issues identified at Stage 1 may be capable of being addressed via conditions or secured within a Section 106.
27. An assessment of the revised scheme and outstanding issues is discussed in the following sections.

Land use principles

28. As set out at consultation stage the principle of student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace was supported in accordance with Policies E1, H15 and H16, subject to appropriately securing nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student

accommodation and affordable workspace. In the absence of a s.106 legal agreement the student accommodation and provision of affordable housing and workspace has not been secured and thus the proposals are unacceptable in land use terms. These should be appropriately secured by s106 obligations as part of any future planning permission.

Student housing

29. At Stage 1 the Council was advised that the offer of 35% affordable student bedrooms would be in line with the London Plan and Fast Track Route criteria. The applicant and Council were required to, through a S106 obligation enter into a nominations agreement with one or more registered higher education provider for all of the affordable student accommodation and the majority of the student accommodation should be secured. In the absence of a s.106 legal agreement the developer has not entered into a nominations agreement and the provision of affordable student bedrooms has not been secured. Accordingly, the proposals are unacceptable in this regard and a nominations agreement should be secured through s106 obligation as part of any future planning permission

Urban design

30. At consultation stage the LPA was advised that the layout, design, public realm, and architectural quality of the scheme was supported. It was noted that the site is not identified in Camden's Local Plan as suitable for tall buildings. However, having regard to the townscape assessment, the height of the proposed development could have been supported. No harm was identified to nearby heritage assets.

Tall building

31. At consultation stage GLA officers considered there may be material considerations that justify a tall building on the site, subject to the additional information regarding the visual, functional, environmental and cumulative impacts of a tall building at this site which is not located within an area identified for tall buildings and is therefore not in compliance with Policy D9 (B) . As part of its draft decision notice the Council have included two reasons for refusal which relate to the height and massing of the proposals. The decision notice states:
- The proposed development, by virtue of its height, mass, scale and footprint, would be detrimental to the streetscene, setting of the nearby listed buildings and the character and appearance of the wider area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.
 - The proposed development, due to its height, massing, scale and location, would result in a material loss of light and outlook as well as having an overbearing impact and an increased sense of enclosure on the occupiers of Winchester Apartments and users of Netley Primary School's external amenity space, contrary to policy A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.
32. GLA officers note that in respect to the effect on the streetscene the Mayor's stage 1 response set out the development would make a positive contribution in immediate views, through the replacement of the existing poor quality building, and to the local townscape and skyline, through the development of a building of high architectural

quality. It was also confirmed that GLA officers were of the view that there would be no harm to the surrounding heritage assets.

33. The Council's second reason for refusal in relation to height and massing states the proposals would result in a material loss of light and outlook as well as having an overbearing impact and an increased sense of enclosure on the occupiers of Winchester Apartments and users of Netley Primary School's external amenity space. At stage 1 the Council was advised to undertake a full review of the environmental impacts as part of their assessment of the proposal as local planning authority.

Quality of accommodation

34. At consultation stage GLA officers confirmed that the current layout proposes a mix of studios and dual-occupancy units with two single bedrooms sharing communal kitchens and bathroom facilities. The standard of student accommodation is very high and includes high quality access from street level (at prominent corner), with generous and welcoming lobby space, well designed interiors to units, and excellent amenity space offer (particularly at roof level). However, it was also noted that the success of the proposed amenity spaces is also subject to appropriate management and maintenance. Accordingly, management and maintenance plans should be secured within a Section 106 agreement. Measures to mitigate privacy impacts from within the courtyard to the residential dwellings, including high-quality landscaping and defensible spaces should also be secured. As part of the Council's draft decision notice it included a reason for refusal relating to the residential quality of the scheme stating a number of the student accommodation units within the proposed development, by reason of their poor levels of outlook, light, internal space, accessibility, external amenity space and ventilation, would fail to provide adequate internal living conditions for future occupiers, resulting in substandard accommodation. The quality of accommodation does not give rise to strategic concern however appropriate management and maintenance plans and mitigation measures relating to amenity should be secured by appropriate s106 obligations or conditions as part of any future planning permission *Fire strategy*

35. At Stage 1 the applicant was advised that the outline fire strategy which had been submitted which was developed by a specialist fire consultant; did not fully address the matters outlined in Policy D5 and D12 of the London Plan concluding therefore that the strategy did not yet fully comply with policy. Since consultation stage the applicant has provided an updated fire strategy. A fire strategy which fully complies with the requirements of London Plan Policies D5 and D12 must be secured as part of any future planning permission.

Heritage

36. At Stage 1 GLA officers concluded that no harm would be caused to the setting and significance of the surrounding designated heritage assets. As such, the development would be in line with London Plan Policy.

Transport

37. At stage 1 the applicant and Council were advised that the proposed car free residential-led development is supported in principle. Disabled persons car parking

provision should be confirmed. Trip generation for all elements of the scheme should also be clarified. The impact of the construction movements needs to be discussed further with to ensure road safety during construction. Appropriate mitigation for on street accessible cycle parking provision should be provided and secured as part of any future planning permission

Blue-badge vehicle parking

38. Policy T6.1 of the London Plan requires residential development proposals delivering ten or more units to deliver at least one designated disabled persons parking bay for 3% of dwellings (1 space), and further demonstrate provision for an additional 7% for further demand. Commercial floorspace should also have access to at least one space. Noting that student accommodation is sui generis, the proposal will include wheelchair accessible and adaptable units potentially generating demand for disabled parking. The proposed building footprint does not enable any blue badge parking on site. Furthermore, the applicant considers that there are conveniently located on street bays that could serve the student and office elements of the scheme. An appropriate level of blue-badge parking; either on site or on street as appropriate, should be secured as part of any future planning permission.

Construction and delivery management, student travel plan and car free agreement

39. In the absence of conditions and a legal agreement final versions of a construction logistic plan and road safety audit, student travel plan and car free agreement should be appropriately secured as part of any future planning permission.

Cycle parking provision

40. At Stage 1 it was confirmed that the proposed 180 long stay spaces and 8 short stay spaces for the student accommodation and 20 long stay and 3 short stay spaces for the affordable workspaces, and re-provision of the existing residential cycle spaces of 12 long stay spaces was in line with London Plan Policy T5 Table 10.2. The delivery of all cycle parking should be secured by condition as part of any future planning permission. Appropriate mitigation for on street accessible cycle parking provision should be provided and secured as part of any future planning permission

Sustainable development

Energy

41. At Stage 1 based on the information provided, the non-domestic element of the proposed development was unclear and it could not be confirmed whether the development would achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The applicant was instructed to model additional energy efficiency measures to meet the energy efficiency target. The hot water demand is high, and the applicant was advised it should consider the potential for wastewater heat recovery. It was also noted that the applicant was advancing a Combined Heat and Power system; however, given the scale and nature of the development this was not acceptable, as set out in Policy SI3. The applicant was advised to investigate alternative low carbon heating methods and that the proposed strategy should be revised. The applicant was instructed it should confirm the carbon shortfall in tonnes CO2 and the associated

carbon offset payment that would be made to the borough. Since Stage 1 the applicant engaged in collaborative discussions with the Council and GLA to provide additional information and revisions in respect to; non-domestic carbon savings, energy efficiency, the proposed energy centre, photovoltaic panels, district heat networks and air source heat pumps. A policy compliant energy strategy should be appropriately secured as part of any future planning permission

Flood risk and drainage

42. At Stage 1 the applicant was advised that potential for shallow groundwater beneath the site existed, which should be assessed, with appropriate mitigation measures provided if necessary. Further, the applicant was required to provide an assessment of sewer flood risk and provide appropriate mitigation measures against the potential for elevated groundwater beneath the site. Additional information was requested regarding; the surface water drainage strategy which did not comply with the Policy SI13 of the London Plan and water consumption for the scheme. Since Stage 1 the applicant has submitted additional information and clarification in respect to; the ground conditions, flood risk, surface water drainage and water consumption. Details should be secured by way of condition on any future planning permission.

Circular economy

43. At Stage 1 the applicant was advised it must submit a circular economy statement in accordance with London Plan objective GG5 and Policy D3. Since Stage 1 the applicant has produced and submitted a circular economy statement. A circular economy strategy which fully complies with the requirements of London Plan must be secured as part of any future planning permission.

Whole life carbon

44. At Stage 1 it was noted that London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. The applicant was advised that a Whole Life-Cycle Carbon template (produced by the GLA) should be completed in accordance with the assessment guidance to calculate and reduce WLC emissions against the GLA's benchmarks provided in the guidance. Following Stage 1 the applicant confirmed that this would be resolved by way of planning condition. This should be secured as part of any future planning application.

Local consultation process

45. Camden Council publicised the application by sending notifications to local addresses, and issuing site and press notices. The relevant statutory bodies were also consulted. Copies of all responses to public consultation, and any other representations made on the case, have been made available to the GLA.

Responses to neighbourhood consultation

46. Following the neighbourhood consultation process Camden Council received a total of 6 responses (4 in objection and 2 neutral comments). The reasons for objection and neutral comments raised as part of the neighbourhood consultation process are collectively summarised below.

Neighbourhood objections

Land use principles

- Potential to create a negative precedent

Urban design

- Density
- Over crowding
- Height and massing
- Public realm and landscape design
- Daylight/sunlight
- Townscape and visual amenities
- Sense of enclosure

Sustainable development

- Air quality impacts
- Environmental impacts
- Pollution (including noise and air)

Transport

- Traffic
- Construction phase impacts
- Highway impacts
- Healthy streets impacts
- Cycle parking and highway impacts of cyclists

Miscellaneous

- Lack of consultation
- Lack of public/community benefit
- Health impacts to existing residents
- Cumulative impact of other development
- Noise and disturbance
- Social issues/transient communities
- Lack of supporting infrastructure (GP's surgeries etc)

Neutral neighbourhood comments

- Public realm improvements welcomed
- Amenity space questioned
- Consultation (both applicant and Council)
- Traffic concerns raised

Representations to the Mayor

47. The Mayor did not receive any direct representations.

Responses from statutory bodies and other organisations

48. The responses from statutory consultees and other organisations can be summarised as follows:

- **Thames Water:** No objection.
- **Design out Crime (London Met police):** No objection.
- **Regent's Park Estate Tenants and Residents Association (TRA):** The residents association raised objections in relation to; insufficient consultation, poor relationship to local area and townscape, height, daylight/sunlight and loss of light, relationship to existing development, overlooking, heritage impacts, viewing corridors, lack of housing.

Response to public consultation - conclusion

49. Having had regard to these representations GLA officers are satisfied that the statutory and non-statutory responses to the public consultation process, do not raise any material planning issues of strategic importance that have not already been considered in this report, or in consultation stage report GLA/6844/S1.

Legal considerations

50. Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

51. Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the Council to do so) and determining any approval of details (unless the Council agrees to do so).

Conclusion

52. Having regard to the details of the application, consideration within this report, the matters set out in Camden Council's planning report and Camden Council's draft decision notice there are no sound planning reasons for the Mayor to intervene in this particular case and therefore no basis to issue a direction under Article 7 of the Order 2008.
53. The outstanding matters relating to land use principles, affordable student bedrooms, urban design, sustainable infrastructure and transport are addressed accordingly; and the conditions and legal obligations identified in this report, the report reference GLA/6844/01 and the Council's committee report should be secured as part of any future planning permission .

For further information, contact GLA Planning Unit (Development Management Team):

Connaire O'Sullivan, Principal Strategic Planner (case officer)

email: Connaire.OSullivan@London.gov.uk

Graham Clements, Team Leader – Development Management

email: Graham.Clements@London.gov.uk

Allison Flight, Deputy Head of Development Management

email: Alison.Flight@London.gov.uk

John Finlayson, Head of Development Management

email: John.Finlayson@London.gov.uk

Lucinda Turner, Assistant Director of Planning

email: Lucinda.Turner@London.gov.uk

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

APPENDIX 10 – HISTORIC ENGLAND CONSULTATION RESPONSE



Historic England

LONDON OFFICE

Mr Ben Farrant
London Borough of Camden
Regeneration and Planning
Town Hall
Judd Street
London
WC1H 9JE

Direct Dial: 020 7973 3763

Our ref: P01322810

17 December 2020

Dear Mr Farrant

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**17-37 WILLIAM ROAD LONDON NW1 3ER
Application No. 2020/5473/P**

Thank you for your letter of 27 November 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England was involved in pre-application discussions regarding these proposals with the development team earlier this year. I attach our advice letter provided at that stage which forms part of this statutory response.

The submitted application appears broadly in-keeping with the plans we previously reviewed. We therefore maintain the position set out in the attached letter, and have no further comments to make.

Recommendation

Your authority should take these representations into account in determining the application, and also seek the views of your Conservation Officer. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA
Telephone 020 7973 3700
HistoricEngland.org.uk



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Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.



Historic England

LONDON OFFICE

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Alasdair Young

Alasdair Young

Inspector of Historic Buildings and Areas

E-mail: alsadair.young@HistoricEngland.org.uk

Enc. Pre-application advice letter (Our ref: PA01120405, 16 September 2020)



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Historic England

Mr David Shiels
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Direct Dial: 020 7973 3763

Our ref: PA01120405

16 September 2020

Dear Mr Shiels

Pre-application Advice

17-37 WILLIAM ROAD, EUSTON

Thank you for involving Historic England in pre-application discussions regarding the proposed development at 17-37 William Road in the London Borough of Camden. It was very useful to hear more about the emerging scheme at our meeting last Wednesday.

Historic England Advice

Significance

The development site occupies a prominent plot on the corner of William Road and Stanhope Street near Euston Station. The site does not include any designated heritage assets, and the existing six-storey office building is of low architectural quality in our opinion. However there are a number of historic buildings to the south along Stanhope Street including a pair of early 19th century terraced houses, and the Lord Nelson Public House - all listed at Grade II. On the corner with Drummond Street is a substantial early to mid-20th century office building which is included on the London Borough of Camden's Local List.

The site is also located within the viewing corridor of London View Management Framework (LVMF, 2012) View 2A.2 which includes a Protected Vista from the summit of Parliament Hill towards the Palace of Westminster World Heritage Site (WHS).

The LVMF Supplementary Planning Guidance (SPG, Mayor of London, March 2012) includes Visual Management Guidance for this Protected Vista. It states that "new development (in the foreground and middle ground) should preserve or enhance the viewer's ability to recognise and appreciate the Palace of Westminster in this view" (p46, Para 101). The SPG also includes general policies regarding Protected Vistas. It states that "where there is a Protected Vista... development that exceeds the threshold height of a Landmark Viewing Corridor should be refused" (Policy 7.12 F, p15).



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The development site also located approximately 230 metres from the eastern boundary of the Grade I Registered Regent's Park which is noted in this location for the Grade I listed park-fronting Regency townhouses which were largely designed by John Nash and constructed in c1825.

The Proposals and Their Impact

As explained at our meeting, the proposals involve total demolition on site and the erection of a 15-storey building to accommodate flexible workspace and student accommodation. The massing of the building would comprise of a lower section similar in height to the neighbouring historic buildings, and an upper tower. The pre-application report demonstrates that the tower element would project above the Threshold Plane of View 2A.2, but would appear directly in front of another modern building at 10 Brock Street, Regent's Place.

Historic England's Position

We have no concerns with the proposed demolition of the existing building on site, and we are comfortable with the scale of the development in relation to the nearby listed buildings given the mix of building heights in the Euston area. The two constituent parts of the building help to break down the overall mass of the building and provide an appropriate context to the historic streetscape. Similarly the design of the proposals, which draw influence from the locally listed corner office building, appear high quality and sympathetic to the architectural character of the area.

Whilst we are generally supportive of this architectural approach, we would encourage any opportunities to reinforce the prevailing parapet line along Stanhope Street in the detailing of the proposed building's lower mass.

The two main areas of sensitivity to us are the impact of the 15 storey tower on the Palace of Westminster WHS and on the Grade I Regency townhouses as seen from Regent's Park. Regarding the latter, the visual assessment provided in your pre-application report (p16-17) indicates that there would be no visibility of your development in key views from Regent's Park. We therefore have no concerns over this part of our assessment.

With regards to the Palace of Westminster, the proposals would break the Threshold Plane of View 2A.2 as we have previously set out. Whilst this impact is contrary to the LVMF guidance, the focus of our assessment is the effect that this impact has on the Outstanding Universal Value of the WHS. The recently constructed building at 10 Brock Street would appear larger than your proposals in this view, and would block its silhouette. Within this context, we consider that the viewer's ability to recognise and appreciate the Palace of Westminster in this view would be preserved, and that no harm to the Outstanding Universal Value of the WHS would result from these proposals.



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Historic England

We understand that the currently proposed height of 15 storeys has come about as a result of negotiations with Camden Council officers. We consider that any significant increase in height might have implications on the setting of heritage assets in the local and wider area. Nonetheless, on the basis of the scheme as currently presented, Historic England has no significant concerns.

Next Steps

We welcome the opportunity to engage in discussions regarding these plans at pre-application stage. As set out, these proposals raise no significant concerns to us, and we are content for Camden Council officers to lead on further pre-application discussions without our involvement.

Please note that these proposals relate to historic buildings and areas only. Comments on any archaeological implications should be sought from our colleagues in the Greater London Archaeological Advisory Service (GLAAS) on 0207 973 3712.

Yours sincerely

Alasdair Young

Alasdair Young
Inspector of Historic Buildings and Areas
E-mail: alasdair.young@HistoricEngland.org.uk

cc: Sandy Kidd, GLAAS, Historic England

17-37 WILLIAM ROAD, EUSTON Pre-application Advice

Information Provided

William Road (Morris+Company, August 2020)



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APPENDIX 11 – LBC EMAIL DATED 5TH MAY 2021

David Shiels

Subject: FW: 17-37 William Road

Sent: 05 May 2021 20:55

To: David Shiels <david.shiels@dp9.co.uk>

Subject: RE: 17-37 William Road

Hi David,

Our view remains that the loss of employment is unacceptable and would form a refusal reason. The office marketing and affordable workspace points are not considered to overcome this.

Kind regards,

Nathaniel Young
Planning Officer

Telephone: 020 7974 3386



The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

APPENDIX 12 – DP9 EMAIL DATED 6TH MAY 2021

David Shiels

Subject: FW: 17-37 William Road
Attachments: 2020/5473/P - 17-37 William Road; RE: 2020/5473/P - 17-37 William Road

From: David Shiels
Sent: 06 May 2021 09:39
To: Nathaniel Young <Nathaniel.Young@camden.gov.uk>
Subject: RE: 17-37 William Road

Hi Nathan

Thanks for response.

This is the first time we have been made aware that this would form a reason for refusal. We were hoping for some clarity on the economic development response issued previously (attached for reference), and we have provided some of the additional information requested in this response (my previous email attached with additional information issued).

It's worth highlighting again that the office has been vacant since March 2019 (26 months in total) and has been marketed since the current owner acquired the site in July 2019 (22 months in total). As per the conclusions of the Employment Land Statement submitted in support of the application, it is considered that the building will continue to be of no interest to the market. The GLA Stage 1 also agrees with this conclusion. We therefore consider the proposed reduction in office to be in accordance with the policy requirements.

Could you please let us know the reasoning behind the potential reason for refusal?

Many thanks

David

David Shiels
Associate
direct: 020 7004 1795
mobile: 07880 070 760
e-mail: david.shiels@dp9.co.uk

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From: Nathaniel Young <Nathaniel.Young@camden.gov.uk>
Sent: 05 May 2021 20:55

To: David Shiels <david.shiels@dp9.co.uk>

Subject: RE: 17-37 William Road

Hi David,

Our view remains that the loss of employment is unacceptable and would form a refusal reason. The office marketing and affordable workspace points are not considered to overcome this.

Kind regards,

Nathaniel Young
Planning Officer

Telephone: 020 7974 3386



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APPENDIX 13 – EXTERNAL SITE PHOTOGRAPHS



