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Planning Statement

Euston House, 24 Eversholt Street, London NW1 1AD

Iceni Projects Limited on behalf of
Arax Properties

December 2021

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ON BEHALF OF ARAX
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Planning Statement
EUSTON HOUSE, 24 EVERSOLT STREET, LONDON
NW1 1AD

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1. INTRODUCTION

1.1 This Planning Statement is submitted to the London Borough of Camden ('the Council') on behalf of Arax Properties ('the Applicant') in support of an application for full planning permission at Euston House, 24 Eversholt Street, London NW1 1AD ('the site').

1.2 The application seeks full planning permission for:

External alterations including the construction of an atrium roof, external roof terrace at level 9, the installation of balconies at levels 1 – 8, the removal of the existing atrium roof at level 1, additional Class E floorspace at levels 7 and 8, and a new cyclist entrance at Lancing Street with associated plant at roof level.

1.3 This Planning Statement has been prepared by Icen Projects Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels, together with other material considerations.

1.4 The purpose of this application is to provide a series of sympathetic modifications which would address existing practical and commercial issues within Euston House, including the poor quality and constrained arrival experience, lack of external amenity space and poor energy performance.

1.5 The proposed development would address these issues in an environmentally considerate way, with a range of interventions being delivered with end user experience / tenant in mind. The proposals include the installation of external amenity balconies, a roof terrace, improved end of journey experience, and the replacement of redundant plant with modern energy efficient equipment.

1.6 The objective of these improvements is to ensure Euston House is brought in line with modern day requirements, with the various interventions all seeking to ensure that the building is more attractive to tenant as a workspace and provides a range of amenities that entice workers back to the office as the London employment market rebounds after the COVID-19 pandemic.

The Applicant, background and scheme objectives

1.7 Arax Properties is a London-based company which invests in and manages assets throughout the United Kingdom and continental Europe. Arax has an established track record in delivering

sustainable value across their portfolio and ensuring that their properties provide high-quality, modern accommodation for a range of commercial occupiers across a range of sectors.

1.8 Arax's investment in the site shows their commitment to improving the high-quality working environment for businesses, with a series of interventions proposed that have been specifically designed to encourage workers to return to the office following the end of the COVID-19 pandemic. This includes a focus on well-being, amenity, flexibility and community.

1.9 Arax wish to improve the overall quality of the office accommodation and user experience of Euston House, through the delivery of well-being facilities including the installation of outdoor balconies, a mix of available workspace including a roof terrace and a dedicated cyclist entrance. These are all modern-day demands for commercial accommodation in central London.

The Submission

1.10 This Planning Statement should be read in conjunction with the other documents submitted in support of this planning application. These documents comprise:

- Planning Application Forms and Certificate of Ownership, prepared by Icen Projects
- CIL Form, prepared by Icen Projects
- Planning Statement, prepared by Icen Projects
- Site Location Plan, prepared by Apt Architects
- Existing and Proposed Plans, prepared by Apt Architects
- Design and Access Statement, prepared by Apt Architects
- Fire Statement, prepared by Affinity Fire Engineering
- Heritage and Townscape Assessment, prepared by Icen Projects
- Daylight and Sunlight Assessment, prepared by GIA
- Sustainability Statement, prepared by Hilson Moran
- Noise Impact Assessment, prepared by KP Acoustics.

2. THE SITE AND RELEVANT PLANNING HISTORY

- 2.1 Euston House is situated in the St Pancras and Somers Town ward within the administrative boundary of the London Borough of Camden.
- 2.2 The Site is located on the east side of Eversholt Street, to the east of the station, and comprises a nine storey prominent 1930s office building erected for the London, Midland and Scottish Railway.

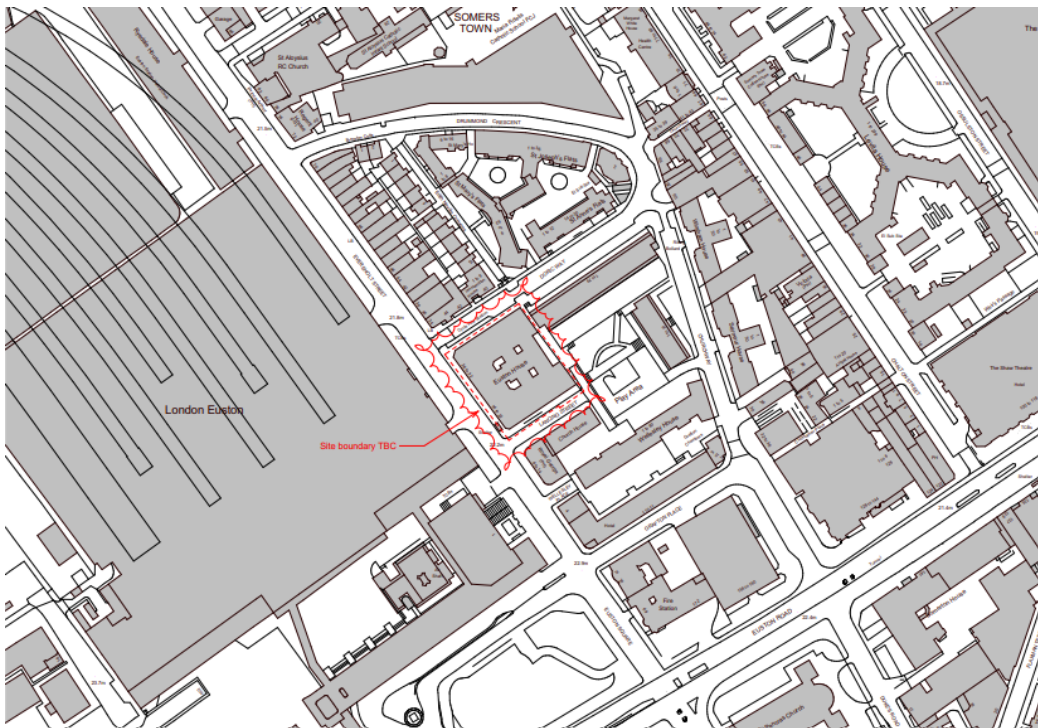


Figure 2.1 Site Location Plan

- 2.3 To the west of the site lies Euston Station, while to the north runs Doric Way, comprising of commercial and residential units. Located behind Euston House, to the east, lies the largely residential area of Somers Town. To the south runs Lancing Street, beyond which lies commercial and residential units including the Grade II listed Royal George public house, and St Pancras Church House.
- 2.4 In the immediate surroundings there is a mixture of building types, including those associated with Euston Station and those located at the prominent city junction between Euston Road and Eversholt Street.

- 2.5 The Site does not contain any listed buildings or structures and is not within a conservation area. However, it has been identified as a locally listed building by the London Borough of Camden and falls within the wider setting of the London View Management Framework (LVMF) Protected Vista from Assessment Point 6A.1 (Blackheath Point to St Paul's Cathedral). The nearest listed building is the Grade II listed Royal George public house, to the south of the site.
- 2.6 The site has a public transport accessibility level (PTAL) rating of 6b, indicating an excellent level of public transport accessibility.

Planning History

- 2.7 A review of the planning portal for the London Borough of Camden has identified the following planning history for the site:

Application Reference	Proposal	Decision
2020/4138/P	Variation of condition 1 (personal permission) of planning permission 2011/3120/P dated 13/09/2011 ["(Variation of condition 1 (personal permission) of planning permission granted 28/05/1998 (ref: PS9804251)"] namely to extend lawful use to Class E 'Commercial, Business and Service'.	Granted 28/11/2020
2013/3027/P	External alterations at ground floor level including installation entrance doors, ramped entrance area and cigarette bins to office (Class B1).	Granted 15/08/2013
2011/3120/P	Variation of condition 1 (personal permission) of planning permission granted 28/05/1998 (ref: PS9804251) for the dual use (in whole or in part) of the basement to eighth floor for (B1) offices or (D1) educational purposes with ancillary functions, personal to Learning Tree International Ltd - to extend personal permission to include EC English London Ltd.	Granted 13/09/2011

3. THE PROPOSED DEVELOPMENT

3.1 This planning application seeks planning permission for the alterations and upgrades to the existing building to provide a suite of improvements to the existing office space. These works include:

- The construction of a roof over the central atrium, together with the removal of the existing atrium roof at Level 1, in order to create a large open internal space that improves the overall arrival experience into the building
- The provision of a roof terrace to provide outdoor amenity for building occupiers
- An extension on the eastern side of the building to provide additional office floorspace on Level 7 and Level 8
- Insertion of inset balconies at Level 1- 8 on the eastern elevation of the building
- A new entrance for cyclists on Lancing Street.
- Provision of new energy efficient plant at roof level.

3.2 The proposed description of development is as follows:

External alterations including the construction of an atrium roof, external roof terrace at level 9, the installation of balconies at levels 1 – 8, the removal of the existing atrium roof at level 1, additional Class E floorspace at levels 7 and 8, and a new cyclist entrance at Lancing Street with associated plant at roof level.

3.3 The proposals would deliver a significant upgrade to the existing facilities provided within the building and reflect the Applicant's objectives of providing a high-quality working environment for businesses and encourage workers to return to the office following the COVID-19 pandemic. This includes a focus on well-being, amenity, flexibility and community.

3.4 At the ground floor level, a lightwell would be created to let light into the lower ground area and a roof enclosure at level 9 would provide an 'experience' atrium space into the heart of the building.

3.5 The balconies at level 1 – 8 would provide external amenity space at each level. Green screening would be provided along the balconies to prevent overlooking onto the neighbouring residential building.

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- 3.6 The additional floorspace at level 7 and 8 would complete the form of the building, whilst providing additional high quality office space.
 - 3.7 The new roof and terrace would provide high quality flexible amenity floorspace for occupiers, enhancing the working environment.
 - 3.8 A new entrance for cyclist along Lancing Street will allow provide access for larger cycles and mobility scooters down to the cycle storage at basement level via a cycle and goods lift.

4. PLANNING POLICY CONSIDERATIONS

4.1 This section of the Planning Statement defines the Development Plan and assesses the proposed development against the relevant adopted and emerging planning policy and guidance at national, regional and local level.

The Development Plan

4.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

4.3 The statutory development plan for the proposed development consists of:

- The London Plan (2021)
- The Camden Local Plan (2017).

4.4 Camden Council also have a number of supplementary planning documents / guidance (SPDs/ SPGs) which form material considerations for this application.

4.5 The updated National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.

4.6 The National Planning Policy Guidance (NPPG) is a web-based resource that was published on 6 March 2014 and provides information and guidance on planning. The NPPF and NPPG form material considerations in the determination of the application.

4.7 An assessment of the key planning considerations for the proposed development is provided below.

Principle of development

4.8 Policy E1 'Economic development' of the Camden Local Plan (2017) states that improvements to the quality, flexibility and adaptability of office and commercial space of different sizes should be supported. Policy E2 'Employment premises and sites' seeks to protect existing premises and encourages the provision of employment premises and sites in the borough. Additionally, Policy E2 'Providing suitable business space' of the London Plan (2021) makes it clear that all commercial space should be designed to be flexible to accommodate a range of employment uses.

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- 4.9 Camden Local Plan Policy G1 ‘Delivery and location of growth’ sets out that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden. The policy further states that the most significant growth is expected to be delivered through, amongst others, a concentration of development in the growth areas of King’s Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road.
- 4.10 The principle of office use at the site has been established through its existing use. The proposed development seeks to enhance the existing facilities through increasing and enhancing the outdoor amenity facilities within the site and providing high quality end of journey facilities to cater for sustainable transport modes, including cycling.
- 4.11 The provision of a roof terrace and the installation of balconies are considered appropriate in this central location. They would provide additional amenity space for office occupiers which can be used for wellness activities, additional meeting space and to access fresh air and sunshine. As set out in the following sections of this planning statement, there would be limited harm to nearby residential amenity, and the terraces would provide high quality, private outdoor amenity space, improving the accommodation available to the occupiers.

Design and heritage

- 4.12 Good design is a central objective of the London Plan (2021). At the local level, Local Plan Policy D1 ‘Design’ outlines that new development should deliver high quality design.
- 4.13 Policy CC2 ‘Adapting to climate change’ promotes sustainable design and construction.
- 4.14 High quality design and sustainability benefits have been key to the objectives of the proposal, with the proposed development seeking to improve the visual appearance of the site. The proposals would complete for form of the building, through additional floorspace at level 7 and 8 and insert balconies from level 1 – 8. The balconies have been designed to compliment the existing form whilst providing sufficient screening to prevent overlooking into neighbouring residential properties. The green screening provides a natural defence which would enhance the streetscape.
- 4.15 Policy D2 ‘Heritage’ seeks to preserve, and where appropriate, enhance Camden’s rich and diverse heritage assets and their settings.
- 4.16 The application is supported by a Heritage and Townscape Assessment which identifies that although there would be a slight increase to the massing of the building as a result of the extensions, this is considered to be minimal when considered in the context of the scale and massing of the site as a whole. It is considered that the additions would therefore be consistent with the existing massing

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- of the building and would allow for the rationalisation of the functional rear facade by removing the clutter created by existing plant and harmonising the heights of the rear elements.
- 4.17 The extensions at levels 7 and 8 would align more closely with the heights of the side elements (north and south elevations) and therefore would create a clear 'body' and 'crown' to building, as already appears at the front elevation. The prominence of 'tower' feature on the front elevation would be maintained as the proposed roof extension would remain below its overall height and set back from the facade.
- 4.18 Although not publicly visible, the removal of the plant atop the roof within the lightwell and creation of an atrium would enhance this feature within the building which celebrates the scale of the building internally.
- 4.19 Overall, the proposed development would be a minor addition in the context of the scale and massing of the existing building. The high-quality design of the proposal would preserve the key features of the significance of the building and there would be no harm to the locally listed building.
- 4.20 With regard to the surrounding heritage assets, the effect of the proposed development on the setting of surrounding heritage assets has been supported by the use of the local townscape views as modelled within VUCITY. The views show, primarily, the limited visibility of the proposed development within the wider townscape, with only glimpses possible from selected viewpoints. There is no visibility from the more sensitive views to the south within Bloomsbury Conservation Area and in the context of the Euston Fire Station.
- 4.21 Similarly, visibility from Euston Square Gardens and associated heritage assets and the St Pancras Church which is already limited, if glimpsed at all, would not be materially affected due to the prevailing height remaining the same.
- 4.22 Overall, the Heritage Statement concludes that when considered alongside the surrounding heritage assets, the change to their settings would be minimal, if visible at all, and characteristic and the settings of all surrounding heritage assets would be preserved.
- 4.23 With regard to the London View Management Framework (LVMF), the proposed development would not exceed the prevailing height of the existing building and as a result there would be no impact on LVMF View 6A.

Amenity

- 4.24 Camden Local Plan (2017) Policy A1 'Managing the impact of development' seeks to protect the quality of life of occupiers and neighbours by granting permission for development that do not cause unacceptable harm to amenity. This includes protecting visual privacy and outlook.
- 4.25 Policy C1 'Health and wellbeing' sets out that the Council will improve and promote strong, vibrant and healthy communities. Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate.

Daylight, Sunlight and Overshadowing

- 4.26 The application is supported by a Daylight, Sunlight and Overshadowing assessment which identifies that on completion of the proposed development all properties and amenity areas surrounding the site, with the exception of St Pancras Church House, would meet the national numerical values identified in the BRE handbook for daylight, sunlight and overshadowing.
- 4.27 The properties that were assessed included Royal George Public House, 1-9 Ian Hamilton House, 42 Doric Way, 40 Doric Way, 34-38 Eversholt Street, 1-31 Churchway, St Pancras Church House, 1-79 Doric Way, Wellesley House, St Anne's Flat and St Mary's Flat. With the exception of St Pancras Church House, all of these properties passed the Vertical Sky Component (VSC), No Sky Line (NSL) and Annual Probable Sunlight Hours (AHSP) BRE tests.
- 4.28 The BRE transgressions relate to St Pancras Church House. This site is a residential property that is located directly south of the proposed development. The property has 21 windows serving 15 rooms, all windows facing the site are considered to be habitable rooms due to a lack of available floorplans. Seven windows have been identified as experiencing a reduction of between 20-30% and four between 30-40%. It is noted that all windows that exceed guidance have very low existing VSC levels of between 3.9% -7.8%. Consequently, these windows are extremely sensitive to any loss in VSC which will trigger a BRE breach. This sensitivity is shown as a result of the very minor increasing in massing of the building.
- 4.29 Overall, the absolute VSC loss are between 1.3 – 1.6% and GIA, the daylight and sunlight specialists, concluded that these daylight reductions to this building would not be significant and would likely cause no material change.
- 4.30 Fifteen rooms within St Pancras Church House were assessed for No Sky Line (NSL), all but two achieved BRE compliance. The two rooms that exceed the suggested guidance would lose 24.6% and 28.7% NSL which is just in excess of the BRE guidance of 20%. The NSL values of these rooms are low so any loss in NSL triggers a BRE transgression and the absolute NSL losses to these rooms are only 0.4 and 0.6 sq. m. Overall it is not considered that any NSL loss is significant.

4.31 In conclusion, due to the proximity of St Pancras Church House to the site the majority of windows and rooms all experience low levels of daylight in the existing condition. Therefore, small losses to these values result in BRE transgression which are not considered as being significant.

4.32 Overall, it is considered that these daylight, sunlight and overshadowing results demonstrate that the proposed development would be acceptable on balance.

Overlooking

4.33 The infill balconies at level 1 – 8 have been designed to minimise overlooking onto the adjacent properties along Doric Way. The proposal would feature a ‘screen zone’ directly adjacent to the neighbouring residential building to ensure the risk of overlooking is minimised. These views are oblique and would not be direct window-to-window views.

4.34 A natural green screen is proposed as the design is considered to provide a softer screening for the neighbouring residents and occupiers of the site whilst contributing to the wellbeing objectives of the proposals.

4.35 Overall, the proposed development should be considered acceptable in this regard.

Noise

4.36 Policy A4 ‘noise and vibration’ identifies that the Council will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity.

4.37 The application is supported by a Noise Impact Assessment (NIA) to assess the daytime and night-time levels likely to be experienced by the proposed development. The NIA identifies that the proposed glazing specification would provide internal noise levels for all office environments of the development appropriate to the design range of BS8233:2014. It further states that no further mitigation measures would be required to protect the proposal habitable spaces from external noise intrusion.

4.38 Once all M&E proposals are finalised, further plant noise calculations would be required to demonstrate compliance with the relevant requirements.

4.39 Overall, the proposed development should be considered acceptable with regard to plant noise.

Fire Safety

- 4.40 The application is supported by a Fire Statement which provides details of how the site achieves the required level of fire safety by means of egress, internal fire spread structure, external fire spread and firefighting access.
- 4.41 The atrium has been designed to a standard for buildings taller than 30m and is to be enclosed in fire resisting and smoke retarding construction at all levels other than ground floor. The atrium is to be provided with mechanical smoke clearance and the site would be fitted with sprinklers throughout.
- 4.42 The Fire Statement sets out that a risk profile will be established for the site, and this will form the basis of the fire safety design of the building.
- 4.43 Overall, the proposed development is considered to accord with the relevant fire safety standards as set out by Policy D12 of the London Plan.

Sustainability

- 4.44 Local Plan Policy CC2 'Adapting to climate change' requires all development to adopt appropriate climate change adaption measures. Further, the Council will promote and measure sustainable design and construction.
- 4.45 The application is supported by a Sustainability Statement which outlines the following measure would improve the sustainability of the site:
- The improvement of building services energy efficiency, and the provision of an all electric system.
 - Improvements to biodiversity would be provided on the new building terraces
 - Reduced heat loss and increased shading provided by atrium roof
 - Improvements to access to the building for cyclists
 - Building retention resulting in a lower embodied carbon impact.
- 4.46 Overall, the proposed development would improve the sustainability of the existing building and should be considered acceptable in this regard.

5. CONCLUSION

5.1 This Planning Statement is submitted to the London Borough of Camden ('the Council') on behalf of Arax Properties ('the Applicant') in support of an application for full planning permission at Euston House, 24 Eversholt Street, London NW1 1AD ('the site').

5.2 The application seeks full planning permission for:

External alterations including the construction of an atrium roof, external roof terrace at level 9, the installation of balconies at levels 1 – 8, the removal of the existing atrium roof at level 1, additional Class E floorspace at levels 7 and 8, and a new cyclist entrance at Lancing Street with associated plant at roof level.

5.3 The proposed development seeks to provide a series of modifications which would address existing issues, including the poor quality and constrained arrival experience, lack of external amenity space and poor energy performance of the existing building.

5.4 The proposed development would address these issues in an environmentally considerate way, with a range of interventions being delivered with end user experience in mind. The proposals include the installation of external amenity balconies, a roof terrace, improved end of journey facilities, and the replacement of redundant plant with modern energy efficient equipment.

5.5 The proposed development has been sensitively designed to respect the neighbouring users and nearby listed buildings. High quality, flexible floorspace would be provided for future occupiers and the impact upon existing adjacent users would be minimised.

5.6 Overall, the proposed development complies with the relevant national and local planning policy, and should be approved without delay.