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2 May 2022

Our ref: U0019190

Your ref:

Dear Sirs,

Application for Full Planning Permission Town and Country Planning Act (As Amended) 1990 Floors 6, 7 and 8 of 338 Euston Road, London, NW1 3BG

We write on behalf of our client, British Land, to submit a planning application in respect of levels 6, 7 and 8 of 338 Euston Road, for the installation of louvres on the northern elevation.

A full planning application has been submitted via the planning portal, for the following works:

"Installation of louvres on level 6, 7 and 8 of 33 Euston Road."

Further details of the proposals are set out within this letter.

The Site

338 Euston Road is in a central location adjacent to the Euston Road, close to Euston and Kings Cross Train Stations and situated within the Regent Place Campus. The campus is home to various commercial businesses, with coffee shops and restaurants at the lower levels to provide amenities for the employees in the area. The commercial operators are predominately office base however with the rise of the popularity and success of the Knowledge Quarter, there is an increasing demand for lab spaces within the campus.

The building itself is a tower block, with large windows across all floors, broken up by stone columns with external facing stair and lift cores.

The lawful use of the 6th, 7th and 8th floors is office, now known as Use Class E under the Use Classes Order (2020).

Proposals

British Land are seeking to convert 3 floors within 338 Euston Road (floors 6, 7 and 8) from offices to lab spaces. As both fall under Class E, planning permission is not required for this change of use.

To facilitate the occupation of lab users, additional plant equipment is proposed to be located internally. As these works are internal, planning permission is also not required. To increase the flow of air into the plant



rooms however, it is proposed to replace some of the glazed window panels with louvres on floors 6, 7 and 8. A total of 6 louvres are proposed, which will replace 6 windows (2 on each floor), all on the north elevation of the building.

Planning Justification

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:

- The London Plan (2021)
- The London Borough of Camden's Local Plan (2017)

The key planning considerations affecting the Proposed Development are considered to include design and amenity (including Noise, Air Quality, Ventilation). The relevant policy background and considerations are set out below.

Design

London Plan Policy D3 also states that 'development should 'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions'.

Camden Local Plan Policy D1 <u>states</u> that the Council will seek to secure high quality design in development. Relevant to this application, the Council requires that development:

- Part (a) respects local context and character;
- Part (b) preserves or enhances the historic environment and heritage assets;
- Part (d) is of sustainable and durable construction and adaptable to different activities and land uses;
- Part (e) comprises details and materials that are of high quality and complement the local character;
- Part (i) is secure and designed to minimise crime and antisocial behaviour; and
- Part (k) incorporates high quality landscape design and maximises opportunities for greening.

Each floor on 338 Euston Road has floor to ceiling window panes which allow the existing offices to be naturally lit. The north elevation has two main panels, subdivided into 12 individual windows. The proposals seek to change two of the smaller, upper panes on each floor to louvres. The rooms behind the windows are to be plant rooms and therefore generally not occupied by employees.



The louvres are externally designed to ensure they will sit comfortably within the existing window pane and will be barely viable from street level. The louvres themselves comprise a series of panels, an example of which can be seen on submitted drawing no. EUS-GEN-XX-ZZ-DR-A-230000. There are other examples of similar louvres at the lower levels of across Regent Place Plaza and these proposed louvres have been designed to match accordingly. The proposals are therefore sensibly designed and meet the overall objectives of London Plan policy D3 and Local Plan policy D1.

Noise

Camden Local Plan Policy TC4 part (i) sets out that the Council will consider the noise and vibration levels generated either inside or outside the site and the impact of these levels on the character, function, vitality and viability of a centre and amenity of nearby residential uses.

Plant equipment is proposed to be located internally, behind the louvres and whilst the plant does not require planning permission, for completeness a Noise Assessment has been prepared by Arup to assess the noise impact of this plant.

This report concludes that a noise survey has been conducted to determine the existing noise levels around the building. These have been used to establish plant noise limits in line with the local authority requirements to protect nearby noise sensitive receivers. The proposed development therefore accords with Local Plan policy TC6.

Air Quality

Local Plan Policy A1 part (k) states that the Council will consider impact from odours, fumes and dust to manage the impact of new development. Paragraph 6.22 requires all developments likely to generate nuisance odours to install appropriate extraction equipment and other mitigation measures, which should be incorporated within the building or sited sensitively.

As plant equipment associated with the lab users is to be located internally and facilitated by the proposed louvres, an assessment of the potential air quality and odour considerations has been carried out by Arup.

The emission rate determined for the proposed development was inputted in the dispersion model, so the process contribution associated with the louvres have been assessed cumulatively to give the worst-case scenario. Maximum predicted process contributions for annual and hourly mean across the assessed receptors are below 10% of the EAL. With emissions being maintained at this level there is low risk of any potential impacts at existing receptors. The proposals will therefore not give rise to any air quality considerations and accord with Local Plan policy A1.

Summary

The proposals include the installation of 6, small louvres on existing window panes on the 6th, 7th and 8th floors of 338 Euston Road. These louvres facilitate the installation of plant equipment behind the windows which are required for a future lab use on these floors.



The proposals have been designed sensitively, will be barely visible from street level and will not give rise to any amenity concerns following the installation of the plant. The proposals therefore accord with relevant Camden Development Plan policies.

Application Documents

The full planning application has been submitted online via the planning portal. The following documents support the planning application:

- Application Form and certificate A completed,
- CIL Form,
- Noise Assessment, prepared by Arup;
- Air Quality Assessment, prepared by Arup;
- Existing and proposed drawings, prepared by Gensler.

If you have any questions regarding the application, please do not hesitate to contact Sophie Hinton at this office.

Yours Sincerely

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