

Date  
22<sup>nd</sup> December 2022

Development Management  
Regeneration and Planning  
London Borough of Camden  
Town Hall, Judd Street  
WC1H 9JE

**Submitted via Planning Portal**

Dear Sir or Madam,

**Town and Country Planning Act 1990 (as amended)**  
**Euston House, Eversholt Street, NW1 1AD**  
**Application for Full Planning Permission**

Daniel Watney Have been instructed to submit an application for full planning permission on behalf of Euston Propco SARL for the following development:

*Proposed use of area as a roof terrace, and associated works.*

This application is accompanied by a suite of drawings including location plan and alongside a Design and Access Statement, with this letter acting as Planning Statement. This letter first summarises the context of the site, its planning history and relevant policy designations, and then explores the acceptability the proposal.

In summary, the proposal would see the site improved in its offer for future occupiers and tenants in terms of the amenity and well-being facilities it provides – of particular and mounting importance in the current office market climate. The proposal would make best use of an existing flat-roofed area as a roof terrace, offering substantial benefits to future users of the site while improving visual amenity through the well-designed and minimal external changes necessary to allow for this use. There would also be no harm caused to neighbouring amenity given the significant distance between the proposed terrace and the nearest neighbour.

### Site Description

Euston House is a nine-story office building erected in the 1930's, falling within the London Borough of Camden and in close proximity to Euston Station. The site measures 0.16ha in area (see Figure 1 below) and comprises a purpose-built office building in an area of mixed-character. To the north and to the east lies a mixture of commercial and residential uses on Doric Way and more widely the principally residential area of Somers Town. To the south the area is of a more commercial nature.



Figure 1 – Site Location with Red Line Boundary

The area enjoys a varied mix of uses, as well as a varied character in terms of its architecture. The building is not statutorily listed, nor does it fall within a Conservation Area. It has been identified as a Locally Listed Building by London Borough of Camden, as well as falling within the background assessment area of the London View Management Framework view 6A.1 (Blackheath Point to St. Paul's Cathedral).

The site has a PTAL rating of 6b, the highest rating available. Flood risk mapping indicates it is at risk of neither fluvial nor surface water flooding.

## Relevant Planning History

Daniel Watney LLP has reviewed the planning history for the site as made available online by the London Borough of Camden. Where relevant this is reproduced in chronological order in Table 1 below.

Reference	Description	Decision	Date
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.	Approved	13/09/2011
2013/3027/P	External alterations at ground floor level including installation entrance doors, ramped entrance area and cigarette bins to office (Class B1).	Approved	15/08/2013
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'.	Approved	28/11/2020
2022/0487/P	External alterations including the construction of an atrium roof, external roof terrace at level 9, the installation of balconies at levels 1-8, removal of the existing atrium roof at level 1, rear extension at levels 7 and 8, new cyclist entrance at Lancing Street and associated plant at roof level.	Pending	Validated 15/03/2022

## The Proposal

This planning application seeks permission for the use of the flat roofed area at seventh floor level as a roof terrace and those works necessary to enable such a use. These are summarised below:

- Installation of two new entrance doors, allowing access to the area;
- Floor treatment of the area to enable its use as an amenity space;
- Replacement of existing balustrading, to a standard complying with Approved Document K and therefore meeting the relevant safety requirements for a roof terrace use;
- Installation of lighting to either side of the new doorways, and secured internally-facing lighting to the replacement balustrade; and
- Works to ensure that level access is provided to the roof terrace area.

The lighting proposed to the balustrading will be internally facing and lit to 1,820 lumens or approximately 290 candela, and the smaller down-lighters at the side of each doorway would be lit to a similar level.

The design of the replacement balustrading is yet to be finalised, and as such a condition relating to its final design would be welcomed. Its scale would be that shown in the suite of drawings submitted alongside this application.

## Planning Policy Assessment

### *Relevant Matters*

Local planning policies E1 (Economic Development) and E2 (Employment Premises and Sites) seek to support commercial development and existing commercial premises, particularly with regards to their flexibility and adaptability as well as their general success into the future. In the current office market climate there is a 'flight to quality' where competition is greater than ever and occupier expectations are high. In this context all premises looking to compete must make every effort to take up opportunities to improve the facilities and amenities they can offer prospective tenants.

In principle, the refurbishment of Euston House and the making best use of its features to improve the experience and amenity for occupiers should be accepted in line with Policies E1 and E2. As required by these policies, this should not be at the detriment of visual amenity or neighbouring amenity and these matters are addressed below.

### *Visual Amenity*

Local Plan Policies D1 (Design) and D2 (Heritage) are relevant in this context, the latter given Euston House's status as a Locally Listed Building while falling outside of a Conservation Area and not being statutorily listed.

In complying with these policies, the external alterations required to facilitate the proposed roof terrace are minimal. The replacement balustrade will be materially similar in scale to the existing balustrade, and as such not readily distinguishable as an alteration in any view of the site. The proposed lighting is low level and is either facing directly down or internally into the site excepting that on the western balustrade which, while facing out of the site, would be set deep within the floorplate as compared to the site boundary and would be substantially screened by the balustrading opposite. In these ways, this element of lighting would be minimally visible in level-views at 8<sup>th</sup> floor level and above – a view which does not currently exist.

The doorways to be installed in each elevation to provide access would also not be distinguishable from public viewpoints, being minor additions which see an existing window removed. The distance from any viewpoint to these proposed doors mean it would be unlikely these changes could be distinguished. Furthermore, and as with the lighting, they are set within the floorplate some distance from the site boundary and are therefore only visible in certain angles.

Overall, the changes to allow for the use of the space as a roof terrace are minimal in terms of their design. The balustrading replaces existing balustrading and the lighting has been carefully designed so that it would be internally facing, screened wherever possible, and lit to a level which would cause no light spill. As such, the proposal complies with Policies D1 and D2 of the Local Plan.

#### *Neighbouring Amenity*

Local Plan Policy A1 (Management the Impact of Development) protects the quality of life of occupiers and neighbours, seeking to ensure the amenity of such is protected and where relevant to the proposal this includes the impact of artificial lighting. As noted above, the lighting proposed has been discretely designed so that it causes the minimum visual impact possible. The lighting is to a low level, and as such would result in no light spill. Given this, and the significant distance between the proposed lighting and the nearest neighbouring property, no harm would be caused by this element of the proposal.

Policy A1, as well as Policy A4 (Noise and Vibration), require new development to consider their impacts in terms of noise disturbance caused to neighbouring sites. Again, the roof terrace is significantly distanced from the nearest residential neighbour so that any noise resulting from the proposed use would be unlikely to be heard. Further, the use of the terrace in association with the use of the site as office space means that the times of its typical use would not coincide with the quieter times expected by residential occupiers such as the evenings or weekends. In these ways, the proposal would have an acceptable impact on noise disturbance caused to neighbouring residents.

Latterly, Policy A1 refers to the need to protect visual privacy and outlook of neighbouring sites. There would be no overlooking caused given the 22m distance from the roof terrace to the nearest neighbouring residential property. The sharp angle to this property, and as this distance is measured to the rooftop, mean that overlooking is not possible where residential uses are closest. Furthermore, this distance exceeds the typical 18m window-to-window distance recognised as being an appropriate separation from residential property to residential property.

In these ways, the proposal would cause no undue impact to neighbouring properties and complies with Policies A1 and A4 of the Camden Local Plan.

**Summary and Conclusion**

In conclusion, the proposal would see the site improved in its offer for future occupiers and tenants in terms of the amenity and well-being facilities provided – of particular and mounting importance in the current office market climate.

The proposal would make best use of an existing flat-roofed area as a roof terrace, offering substantial benefits to future users of the site while improving visual amenity through the well-designed and minimal external changes necessary to allow for this use. There would also be no harm caused to neighbouring amenity given the significant distance between the proposed terrace and the nearest neighbour.

I trust that the contents of this submission are sufficiently clear. Should you have any queries please contact Kieran McCallum of this firm using the contact details below.

Yours Sincerely,

**Daniel Watney LLP**  
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020 3077 3400