

DECEMBER 2022

Planning Statement

163, 183 and 203 Eversholt Street, London NW1 BU

Iceni Projects Limited on behalf of Akoya Propco 4 Limited

December 2022

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Planning Statement

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1. INTRODUCTION

- 1.1 This Planning Statement is submitted to the London Borough of Camden Council ('the Council') on behalf of Akoya Propco 4 Limited ('the Applicant') in support of an application for full planning permission and listed building consent at 163, 183 and 203 Eversholt Street, London, NW1 1BU ('the Site').
- 1.2 The application seeks full planning permission and listed building consent for:

External alterations to 163, 183 and 203 Eversholt Street, including: replacement of all windows on the rear elevation at ground, first, second, third and fourth floor; provision of louvres and ducting to the rear elevation; installation of secondary glazing to the ground, first and fourth floor at 163 Eversholt Street, ground and fourth floor of 183 Eversholt Street and ground, second, third and fourth floor at 203 Eversholt Street; installation of new plant and enclosure at lower ground floor level to the rear of 163 Eversholt Street; and replacement of plant at roof level of 203 Eversholt Street.

1.3 This Planning Statement has been prepared by Iceni 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.

Applicant and Development Vision

- 1.4 Akoya was launched by Brunswick Property Partners in 2019. Akoya is an investor and developer of commercial workspaces in emerging local neighbourhoods in London that attract entrepreneurs and creative industries. Their objective is to create sustainable neighbourhood workspace communities, achieved through the repurposing of existing commercial buildings to meet the increasingly flexible needs of local businesses.
- 1.5 The proposal is being promoted by the Applicant as part of a strategic approach to deliver a series of sensitive heritage-led interventions and refurbishments to improve the internal and external quality of the collective asset. These interventions are all governed by an overriding objective of delivering sustainability and energy efficiency improvements and creating flexible, adaptable commercial accommodation.
- 1.6 This application relates to the improvement to the thermal performance and energy efficiency of the Site. Introduction of heritage sensitive secondary glazing to the front, double glazing to the rear and

updated plant services would help lower the carbon emissions and improve the sustainability of the building while retaining its historic character.

1.7 This application is the one of a series of planning applications submitted to the Council to realise this vision. These applications and those to follow represent interventions discussed with the Council in August, September and October 2022 via pre-application consultation.

The Submission

- 1.8 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 Iceni Projects
 - CIL Form, prepared by Iceni Projects
 - Planning Statement, prepared by Iceni Projects
 - Heritage Statement, prepared by Iceni Projects
 - Proposed and Existing Floorplans, Elevations and Sections, prepared by Anomaly
 - Design and Access Statement, prepared by Anomaly
 - Plant Noise Assessment, prepared by RBA Acoustics
 - Sustainability Note, prepared by Troup, Bywaters and Anders

2. THE SITE AND RELEVANT PLANNING HISTORY

- 2.1 163, 183 and 203 Eversholt Street, is situated within the London Borough of Camden, and directly adjoins Euston Station which is located to the south-west of the Site. The Site location plan is included in Figure 1. below.
- 2.2 The Site is formed of three classically composed buildings established as a terraced row along Eversholt Street, with a post-modern façade to the rear of the Site. As existing, 163 and 183 Eversholt Street are 4 storeys tall with 203 extending to 5 storeys. A basement runs below the majority of the terrace alongside a lightwell.
- 2.3 The first evidence of the construction of buildings in their present form on Eversholt Street is through historic mapping of 1896 where the Site is identified as the Railway Clearing House. Various extensions and alterations to the Site have taken place over the years, with further information detailed within the submitted Heritage Statement. Due to the significant historic precedent of the three buildings the Site has a Grade II Listing designated by Historic England.
- 2.4 The Site is surrounded by a mixture of historic and modern development. Directly opposite the Site to the east, beyond Eversholt Street, are a number of three storey terraced dwellings, hosting a mixture of commercial and residential uses, all of which are Locally Listed. Further east are residential flat buildings, some of which are locally listed. To the north are modern residential flat buildings alongside residential dwellings of Grade II Listing. To the west sits further modern flatted development with Euston Station to the south-west.
- 2.5 The Site is located in Flood Zone 1, the lowest probability of flood risk. The Site has a PTAL rating 6a, which demonstrates that the Site has excellent access to public transport.

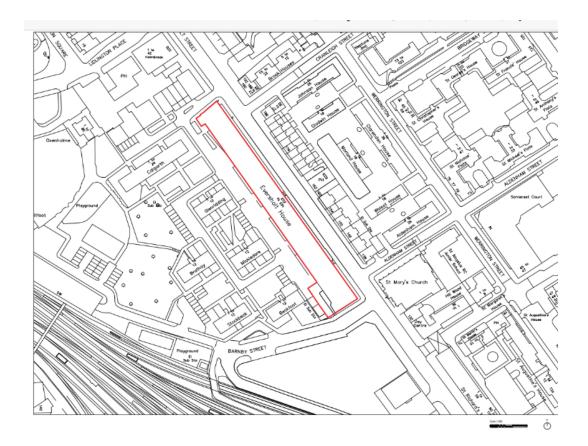


Figure 1. Site Plan

Euston Area Action Plan

- 2.6 The Euston Area Plan is a joint supplementary planning document, jointly developed by Camden Council and the GLA, adopted in 2015. The Plan aims to rejuvenate Euston and the surrounding area, providing new homes, businesses, commercial development and public realm. Key to the Plan is the redevelopment of Euston Station encouraging new pedestrian and cycle routes improving the connectivity to and from the station.
- 2.7 Eversholt Street is situated to the north-east of the Euston Area Plan boundary. Key east west and north – south links are proposed to cross the southern section of Eversholt Street, with station entrances located adjacent to Phoenix Road and Doric Way.
- 2.8 The refurbishment of the 163, 183 and 203 Eversholt Street would play an important role in the rejuvenation of Euston, forming a key historic and notable development along Eversholt Street and the proposed links that sit across it. In addition, the refurbishment would allow for enhanced commercial activity, enhancing the areas role within the wider city.

Relevant Planning History

- 2.9 Due to the age of the Site, there is a substantial amount of planning history relating to 163, 183 and 203 Eversholt Street.
- 2.10 The planning history below establishes that the Site has been subject to several heritage sensitive alterations over a number of years. This includes alterations to existing windows (LPA Ref: 2017/3600/L) which was granted permission under the previous owner of the Site as part of previous thermal improvements and refurbishment on Site.
- 2.11 Permissions granted under 2020/3261/P and 2017/3600/L outlined below relate to alterations to the windows at the rear and front elevation of the Site.

Reference	Address	Date	Description	Decision
8802288	163, 183 and 203 Eversholt Steet (formerly known as 'Eversholt House').	27 th April 1989	Redevelopment of the rear section of Eversholt House, Eversholt Street NW1 by the erection of a building comprising a basement ground first and second floors together with mezzanines at first and second floor levels and the erection of an additional mansard floor all to be used in connection with the retained parts of the building for B1 purposes together with a basement car-park reached via a ramp to the rear with access via Barnby Street as shown in drawings.	Approved
2004/4231/L	163 Eversholt Street	3 rd December 2004	Installation of internal mezzanine floor structure above ancillary accommodation to create additional office floor space.	LBC Approved

2000/4422/		4 Oth	Internal refuglichment of ().	
2008/4102/L	163 Eversholt	13 th	Internal refurbishment of the	LBC
		November	ground and third floors, including	Approved
		2008	new mezzanine floor above ground	
			floor level.	
2016/0533/L	163, 183 and	1 st April	Internal refurbishment to the 3 x	LBC
2010/0333/E				-
	203 Eversholt	2016	reception areas of 163, 183 and	Approved
	Steet		203 Eversholt St.	
2016/0566/L	203 Eversholt	15 th April	Refurbishment of internal first floor	LBC
	Street	2016	office space including addition of	Approved
			new mezzanine floor.	
2017/3600/L	203 Eversholt	18 th	Refurbishment of 2nd floor office	LBC
	Street	September	space including addition of new	Approved
		2017	mezzanine floor and alterations to	
		2011	window openings in rear elevation.	
		0		
2020/3261/P	163 Eversholt	27 th	Refurbishment of ground floor	Approved
	Street	November	office including the addition of new	
		2020	mezzanine floor space and new air	
			handling unit at basement level and	
			the introduction of secondary	
			glazing to all historic windows on	
			the front elevation.	

Pre-Application Consultation

2.52 The Applicant has engaged with Camden Council during a pre-application phase of work relating to a series of strategic interventions to the Site.
2.53 This included a pre-application meeting with the Camden Council Planning and Conservation

2.54 These pre-application discussions saw the Proposal receive the following feedback:

Officers on 25/08/22. Written advice was received on 25/11/2022.

- The insertion of secondary glazing into historic windows is supported as long as the glazing can be inserted without affecting the historic joinery and with glazing bars to compliment the original windows
- Alterations to fenestration at the rear are acceptable as entire rear elevation was rebuilt in latter part of the 20th century and is not of historic or architectural significance
- Any additional plant equipment at the Site would need to be accompanied by an acoustic report with any formal planning submission to demonstrate compliance with the Council's minimum noise standards.
- 2.55 The Applicant and design team have subsequently refined the proposal following this advice ahead of this planning application submission. Further details are set out in the Design and Access Statement, prepared by Anomaly, submitted alongside this application.

3. THE PROPOSED DEVELOPMENT

- 3.1 The proposed development seeks to deliver a range of sensitive improvements to the Site to improve the overall energy efficiency and quality of the commercial accommodation. This includes the delivery of new windows, secondary glazing and new and replacement plant machinery. These interventions are driven by the overall objective to improve the sustainability of the Site, ensuring its longevity as a historic and functioning commercial asset. These interventions sit alongside other interventions proposed in other applications that have been submitted, including internal works and works to entrances and wayfinding.
- 3.2 Specifically, the application seeks full planning permission, listed building consent for the following works:
 - Replacement of all rear windows across 163, 183 Eversholt Street and the rear and side elevations of 203 Eversholt Street with the addition of double glazing.
 - Part demolition and reconfiguration of ground floor windows at 203 Eversholt Street in preparation for additional internal mezzanine (proposals submitted via separate LBC Application 2017/3600/L).
 - Installation of slimline secondary glazing at part ground floor, second floor and fourth floor of 163 Eversholt Street, entrance and part fourth floor of 183 Eversholt Street and ground, second, third and fourth floor of 203 Eversholt Street.
 - New plant services are also proposed to replace the existing on the roof of 203, with the 4 existing condenser units to be replaced with 2 of a similar size, with 1 new unit added to serve the new ground floor mezzanine
 - A plant enclosure will be introduced to the rear elevation with access to the basement via a ramp. Alongside this, discrete ducting will be introduced.
 - Replacement ventilation louvres to the basement lightwell to 163 Eversholt Street
 - Provision of new ventilation louvres to the rear elevation to service the WCs
- 3.3 The proposals relate to windows and plant only, and do not seek to change the existing GIA of the Site. They do they seek to change the Site's existing use.
- 3.4 Specific details of the proposals can be found within the Design and Access Statement prepared by Anomaly.

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)
 - Camden Local Plan (2017)
- 4.4 The updated National Planning Policy Framework (NPPF) was published in February 2021 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.
- 4.5 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.
- 4.6 In addition, the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) places a duty on decision makers to have special regard to the desirability of preserving heritage assets, including conservation areas as a whole
- 4.7 An assessment of the key planning considerations for the proposed development is provided below.

The London Plan (2021)

- 4.8 London Plan Policies were adopted in March 2021. The relevant policies are listed below and expanded upon in the subsequent sections:
 - Policy D4: Delivering good design
 - Policy HC1: Heritage conservation and growth

Camden Local Plan (2017)

4.9 Local Plan Policies were adopted in July 2018. The relevant policies are listed below and expanded upon in the subsequent sections:

- Policy E1: Economic Development
- Policy D1: Design
- Policy D2: Heritage
- Policy CC1: Climate Change Mitigation

Principle of Development

- 4.10 The existing use of the Site is Class E, with 163, 183 and 203 being used for commercial purposes. The alterations to the exterior do not affect the continued commercial operation of the building. The alterations would, in fact, reinforce this commercial use through the improving the building's thermal performance to the benefit of future and existing tenants.
- 4.11 The Site is identified within the Local Plan 2017 as being located within the Central London Area and Camden Knowledge Quarter Innovation District, which promotes development to deliver high quality accommodation for desirable employment uses. The proposal is part of a strategic approach to deliver a series of sensitive heritage-led interventions and refurbishments to improve the internal and external quality of the collective asset.
- 4.12 Overall, the proposal is considered to accord with relevant policies within the Local Plan 2017 in that it would enhance the sustainability and energy efficiency of an existing employment generating asset within the Central London Area.

Design and Heritage

- 4.13 Policy D1 'Design' of the Camden Local Plan (2017), requires all development proposals to provide high quality design and respect local context and character, while preserving and enhancing the historic environment.
- 4.14 Policy D2 'Heritage' seeks to protect heritage assets from harm throughout the borough. Further policy guidance notes that Camden will require to be consulted on any internal or external works that affect special architectural or historic interest.
- 4.15 With regard to the secondary glazing of the front elevation, the slimline profile of the design looks to be as discreet as possible when viewed externally and do not affect the original appearance of the

varied historically significant windows on this part of the Site. In addition, the existing windows would not be harmed during the installation of the secondary glazing.

- 4.16 The rear windows have minimal historic significance, with the entirety of the rear of the building a modern addition. The proposal seeks to replace these modern windows with new windows and this is therefore not considered to cause any harm to the significance of the heritage asset.
- 4.17 In addition, the proposals allow for the sympathetic reconfiguration of the windows to the rear elevation at ground floor to align with a proposed internal mezzanine, which are subject to an additional listed building consent application, which at the time of writing, is currently under consideration by the Council. The reconfiguration to the rear is to include only modern additions to the existing building, and therefore is considered to have no impact to parts of the Site with historic importance.
- 4.18 Replacement of the four condenser units on the roof of 203 are like for like and would not involve the removal of historic fabric. As with existing plant equipment on the roof of 203 the proposed replacement plant maintains the same separation distance from the roofline and remains not visible from street level. Photography in attached DAS illustrates this point.
- 4.19 The addition of the new condenser to serve the ground floor mezzanine would be located adjacent to the existing condensers, and would not result in the removal of historic fabric. The condensers would be sited at the rear of the Site and thus would not be readily visible to public view.
- 4.20 In relation to the replacement louvres given the existing arrangement and limited visibility of basement lightwell to 163 Eversholt, the proposals are not considered to be harmful. There will be additional louvres added to the modern rear elevation to service WCs and improve wider ventilation of circulation spaces. This will be an expansion of the existing grills present on 183 and 163. As this elevation is entirely modern and of limited visibility, the impact of the proposals are not considered to be harmful to the heritage significance of the building.
- 4.21 Overall The proposals have built upon heritage specific guidance to ensure the significance of the heritage assets is preserved, therefore, the proposals are considered to be in alignment with the London Borough of Camden's policies on listed buildings and in alignment with the requirements of the NPPF Chapter 16. The proposals seek to upgrade the sustainability and thermal efficiency of the building whilst preserving the historic and architectural character of the building. Proposals should therefore be considered favourably.

Energy and Sustainability

- 4.22 Policy CC1 'Climate change mitigation' of the Local Plan (2017) supports and encourages sensitive energy efficient improvements to existing buildings.
- 4.23 The existing efficiency of the building is low, in part due to the aging existing windows on Site. The replacement of windows and installation of secondary glazing would allow for improved insulation of the building, increasing energy efficiency and reducing the overall carbon output.
- 4.24 A Sustainability Note prepared by Troup, Bywaters and Anders is appended to this application for technical information on the sustainability improvements offered by proposals. As a result of these interventions, the building would be future proofed and brought up to an EPC rating of B, which would align with the Government's intentions to see commercial properties to achieve an EPC B rating by 2030.

Relationship with Neighbouring Properties

- 4.25 Policy A1 of the Local Plan 2017 seeks to protect the quality of life of occupiers and neighbours of new development. It seeks to ensure that the amenity of communities, neighbours and occupiers is protected. Policy A4 of the Local Plan 2017 seeks to ensure noise and vibration is controlled and managed.
- 4.26 The proposal seeks the replacement of the existing rooftop plant with new building servicing equipment. A Noise Impact Assessment including unattended noise monitoring has been prepared and undertaken by RBA Acoustics to accompany the application.
- 4.27 The assessment and monitoring confirms that the noise level for the proposed plant would comply with the relevant criteria required by Policy A4 of the Local Plan (2017).

5. CONCLUSION

5.1 This Planning Statement has been prepared on behalf of Akoya Propco 4 Limited in support of a planning application for full planning permission, listed building consent, at 163, 183 and 203 Eversholt Street, London, NW1 1BU for:

External alterations to 163, 183 and 203 Eversholt Street, including: replacement of all windows on the rear elevation at ground, first, second, third and fourth floor; provision of louvres and ducting to the rear elevation; installation of secondary glazing to the ground, first and fourth floor at 163 Eversholt Street, ground and fourth floor of 183 Eversholt Street and ground, second, third and fourth floor at 203 Eversholt Street; installation of new plant and enclosure at lower ground floor level to the rear of 163 Eversholt Street; and replacement of plant at roof level of 203 Eversholt Street.

- 5.2 The proposal seeks to deliver a range of heritage sensitive interventions to windows and plant to improve the thermal performance of the Site. Where necessary and in line with pre-application advice from Camden officers, all measures have been taken to retain the historic fabric and character of the building.
- 5.3 Overall, the proposal is considered to constitute a sustainable development that complies with the relevant policies of the development plan and would deliver a significant number of planning benefits. It is therefore considered that the development should be supported, and planning permission and listed building consent be granted subject to relevant and appropriate conditions.