300 GRAY'S INN ROAD STATEMENT OF COMMUNITY INVOLVEMENT

PLATIGNUM PROPERTIES LIMITED

MAY 2023



LONDON COMMUNICATIONS AGENCY





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1. INTRODUCTION

This Statement of Community Involvement (SCI) is submitted on behalf of Platignum Properties Limited (hereafter 'the Applicant'). It accompanies the planning application for redevelopment of 300 Gray's Inn Road, London, WC1X 8DX ('the Site') within the London Borough of Camden Council. The description of development ('the Proposed Development') is as follows:

"Refurbishment and extension of the building to provide residential flats (Class C3) and commercial, business and service use (Class E) including external alterations for new facades to all elevations, the introduction of terraces, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works."

This SCI demonstrates that a considered approach has been taken to consultation around these proposals with local residents and community groups, as well as engagement with councillors and officers at the London Borough of Camden Council.

Specifically, it outlines the pre-application public and stakeholder consultation strategy developed for this planning application, the activities and engagement that took place with key stakeholders and the local community, the comments that were received throughout the consultation period and how the Applicant sought to address the feedback raised by amending the proposed development.

The Applicant proactively sought to hold a variety of consultation activities and events, to ensure the proposals were widely promoted and everyone had a chance to comment. These included emails to, and meetings with, key stakeholder, local newspaper advertisement, flyer to the local area, dedicated website with details of the proposals, dedicated freephone line and email address, social media advertisements, and an in-person and webinar consultation event. A detailed communications and engagement strategy is provided later in the document.

All engagement activities outlined in this document were undertaken by the Applicant and its core project team which included Beltane Asset Management to bring forward and manage the development on their behalf, the lead architects Haptic Architects, planning consultants Gerald Eve and community consultation specialists London Communications Agency ('the project team').

The consultation activities that have taken place are in accordance with the London Borough of Camden's updated Statement of Community Involvement 2023 and also reflect the principles for consultation in the National Planning Policy Framework (2021).

2. CONSULTATION AND FEEDBACK AT-A-GLANCE

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Our outreach to the local community has included:



promoting the consultation

3,767Newsletters/flyers delivered locally

Visitors to our consultation website



6
Members of the public attended



Comments on social media



our consultation events

Calls and emails responded to from the public



Meetings held with political and community stakeholders



64,430

Impressions of our social media adverts



5

Pieces of written feedback received at our consultation events

3. THE SITE AND PROPOSALS

3. THE SITE AND PROPOSALS

THE SITE AND ITS CONTEXT

The site at 300 Gray's Inn Road lies within the King's Cross ward of the London Borough of Camden.

The site occupies a prominent corner site on the junction of Acton Street and Gray's Inn Road, in the Bloomsbury Conservation Area in the London Borough of Camden. The existing building is a part 3, part 8 storey building currently occupied by BUPA within a commercial, business and service (Class E) use, a small area of hard standing is located to the rear accessed from Acton Street.

300 Gray's Inn Road is a five-minute walk from Kings from Kings Cross and St Pancras Station, within the London Borough of Camden, and the Bloomsbury Conservation Area.

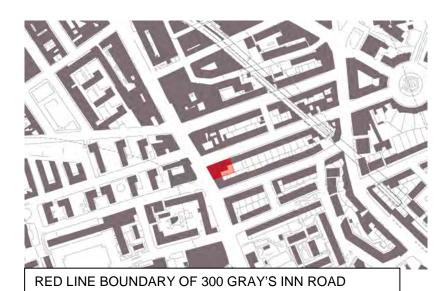
300 Gray's Inn Road is a 1970's office building 500m south of Kings Cross Station. Located on a corner site, the existing building is a 7-storey block, with a lower 3 storey block to the east, straddling a varied townscape of Gray's Inn Road, and the uniform historic street frontage of Acton Street.

The existing building is tired, deteriorating and out of date. The EPC rating is 'G', making it unlettable, due to the poor façade. It's appearance within the Conservation Area is detrimental, and the internal office space is far from the quality expected within the growing Knowledge Quarter. However, the building sits within a rich vibrant location, and provides an opportunity to transform the current building, and give it a new lease of life.

The building's current tenant is BUPA, a private healthcare provider, who will be vacating the premises in the autumn. From this point, the site will be vacant and unused.

The area has undergone rapid change recently with sites at 256 Gray's Inn Road, Acorn House, and 330 Gray's Inn Road recently consented and under construction.

The site is also part of the 'Knowledge Quarter Innovation District' – an area which has one of the highest densities of knowledge based, cultural and scientific businesses anywhere in the world, including the Francis Crick Institute and the Wellcome Trust.





EXISTING SITE OF 300 GRAY'S INN ROAD FROM CORNER OF CROMER STREET



EXISTING SITE OF 300 GRAY'S INN ROAD FROM SOUTH OF GRAY'S INN ROAD

THE PROPOSALS



PROPOSALS FOR 300 GRAY'S INN ROAD FROM CORNER OF CROMER STREET

The brief for 300 Gray's Inn Road is to substantially refurbish and extend the existing building, placing high quality design, and sustainability at the project's core. Refurbishment and extension of the building would provide residential flats and commercial, business and service use.

The proposal retains the superstructure of the building, carefully removing the underperforming façade, subtly altering the core layout to enable better office space and inserting the residential component. A low carbon extension will create two new floors to the taller block (commercial unit), and two new floors to the shorter block (residential unit).

The increase in height still sits within the established height of the neighbouring Acorn House, and targeted set backs to the upper floors mitigate any impact on the neighbouring residential streets. At street level, the congested corner entrance is relocated to the centre of its west façade, where a stepped double height cut away creates an inviting doorway in. The current defensive façade will be opened up at the street level, providing views into the ground floor ancillary café space.

Care has been taken with the design to mitigate any impact on the wider residential streets. The stepping of the mass on the upper floors reduces the proposed building's visibility.

Our ambition for Gray's Inn Road:



- Enhance the Conservation Area, with a new facade which better complements the characteristics of the historic Bloomsbury Conservation Area
- Open up a defensive looking building with new feature windows and a central recessed entrance, providing an active frontage to the building and improving the streetscape
- Deliver new homes for Camden, and respond to London's housing need
- Support the Knowledge Quarter by delivering much needed high-quality workspace for innovation
- Transform an underperforming building and deliver a light, modern office building fit for the future
- Maximise greenery and landscaping, with new terraces and a secluded courtyard garden
- Support the road to Net Zero, with retention of the existing structure, low-carbon construction techniques, passive strategies and improvements to overall environmental performance

4. OUR APPROACH

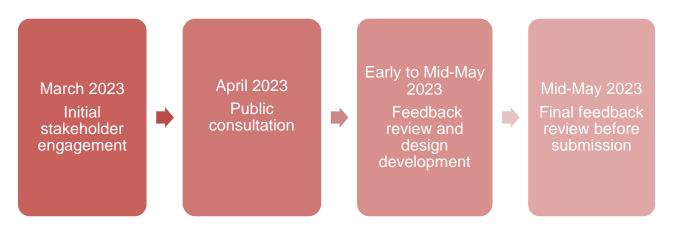
4. OUR APPROACH

LCA was appointed by the applicant to lead a programme of consultation on the proposals. This was undertaken alongside consultation with planning officers and statutory consultees.

The objectives of the consultation were:

- a. **To conduct a targeted consultation**, engaging with the residents living closest to the site, including through various resident and community organisations, as well as local politicians and businesses.
- b. **To explain clearly the aims behind the proposals** and how they would benefit the area, exhibiting all the proposals with as much detail as available at the time.
- c. **To be honest and up front,** not least about the issues that are known to be of interest to residents already, including height, scale and massing.
- d. **To provide opportunities for people to express their views** through various communications channels, including meetings, an in-person exhibition, an online webinar, a consultation website, social media ad campaigns, freephone, and email correspondence.
- e. **To ensure the Applicant and consultant team engaged directly with the public**, reflecting how committed the team is to consultation and understanding people's views.
- f. To work closely with planning officers and councillors as well as the Greater London Authority, so that they are aware of the proposed development, key consultation activities and outcomes.

CONSULTATION TIMELINE



5. CONSULTATION ACTIVITIES



5. CONSULTATION ACTIVITIES

This section details all the consultation activities undertaken in advance of planning submission.

Camden Council has been consulted and involved in the design throughout the development of the scheme and have been kept up to date on our public consultation plans.

CONSULTATION ACTIVITIES

Consultation took place in March, April and May 2023 and set out the site's context, the Applicant's vision for the site and designs. The consultation activities undertaken are set out below, and detailed throughout this section.

Consultation activities included:

- A consultation website (<u>www.300graysinnroad.co.uk</u>) with comprehensive information on the proposals was launched on 14th April. The website was viewed 1,473 times
- A flyer/newsletter was sent to 3,767 local residents and businesses on 21st April, in an area surrounding the site
- Letters to political and community stakeholders to introduce the consultation, which led to two oneto-one meetings being held with the project team
- Newspaper adverts in the Camden New Journal on 20th April, both in print and online
- Social media adverts, leading to 444 click throughs to our website
- A public exhibition on 28th April attended by three people
- A Webinar on Zoom on 16th May attended by three people.

STAKEHOLDER ENGAGEMENT

An introduction email was sent by email on 27 March 2023 to our key stakeholders for the site, the full list of which is set out in the table below in Figure 1. This stakeholder list was developed by LCA at the start of the project to ensure the widest possible consultation, and added to throughout the preapplication process where needed.

The email sent at the start of consultation is shown in Appendix B. The stakeholders were offered a briefing with the project team regarding the proposals, information on the scheme and the project website, and the dates of the public consultation events.

The stakeholders within Figure 1 were kept updated on the progress of the project throughout consultation, to invite them to the public events or offer a briefing with the project team.

Туре	Name	Role
DOLITICAL	Cllr Lotis Bautista	King's Cross Ward Councillor, Camden Council
POLITICAL STAKEHOLDERS	Cllr Liam Martin-Lane	King's Cross Ward Councillor, Camden Council
STAKEHOLDERS	Cllr Jonathan Simpson	King's Cross Ward Councillor, Camden Council
		Bloomsbury Residents' Action Group
		Derby Lodge Tenants Association
COMMUNITY GROUPS		Acton and Swinton Streets Residents
		Association
		Holy Cross Church St Pancras

		King's Cross Mosque and Islamic Cultural Centre
		Lumen United Reformed Church
00110010		UCL
SCHOOLS		Westminster Kingsway College
DUONEOGEO		Groveworld
BUSINESSES		Acorn House, Precis
		London Cycling Campaign
OTHER	Alexander Jan	Central District Alliance
OTHER		Bloomsbury Association
		Bloomsbury CAAC

Figure 1: List of stakeholders kept updated during the consultation

Stakeholder meetings

In response to the stakeholder emails sent out to the stakeholders listed in Figure 1, the applicant arranged briefings with the project team on the proposals for all those that requested them.

These meetings, held either virtually or in-person, were attended by the Applicant and the architect, who gave a presentation on the emerging designs and then sought feedback and answered questions from the stakeholder.

These meetings, held between 21 April and 2 May 2023 are detailed below.

Stakeholder	Date	Topics of discussion
		Does the site need to provide affordable work
		space?
		No, due to the size of the building's square footage,
		there is no requirement for affordable work space on
		site in line with policy.
		Is there ample office demand?
		The project team responded that there was a good
		level of demand for office workspace. After COVID-
		19, staff have been returning to the office and want
		modern, high-quality buildings. Employers similarly
		want to encourage high-quality staff and are seeking high-quality workspaces to encourage this.
Alexander Jan, Chair, Central		riigh-quality workspaces to encourage this.
District Alliance	21 April 2023	
		There were then three points of note for the CDA
		Chair:
		The proposals are far better than what is already
		there currently
		The proposals looked like a 'good scheme', and the
		site is certainly 'desperate for improvement'. The
		project team were noted on the height and massing of
		the project and how this will sit with the building's
		surrounding neighbours.
		Gerald Eve also noted that the building's rating is
		EPC-G and this will need to be resolved before 2030

		as building's will be legally required to be EPC-B or higher.
		There is a need for housing in Camden Alex was conscious that whilst the consultation would cover surrounding residents and businesses, there isn't a significant response from those who would support the additional housing this would bring to the area – future tenants.
		How CDA can support the application: Alex Jan said he would like to support the application, and asked if there were any other BIDs which covered the site, but unfortunately, not. As such Alex was happy to take away a positive outlook of the proposals.
		Cllr Simpson asked for more information on Beltane and the scheme's benefits:
		The team explained that Beltane [as development managers on behalf of the Applicant] has a strong track record, for 20 years their focus has been on sustainable redevelopment and the retention of building's structure to deliver high quality office-led schemes. Their business model is focused on acquiring and owning buildings for the long-term and will not be 'flipping' once planning permission is acquired.
Cllr Jonathan Simpson, Ward Councillor for King's Cross Ward	2 May 2023	Social Value: Cllr Simpson stressed that the social value of a scheme should be considered, and the project should deliver tangible benefits to the local community. The team responded that they were liaising with Westminster Kingsway College on potential work experience in the construction and built environment industry.
		Traffic and a need for a pedestrian crossing: Residents are concerned about the Acton Street crossing and there is a need for one.
		Affordable residential: Cllr Simpson said he would have liked to see affordable residential. The team responded that the project did not meet the uplift required for affordable housing to be provided on site, a financial contribution will be made in line with policy requirements.

PROMOTION

Consultation website

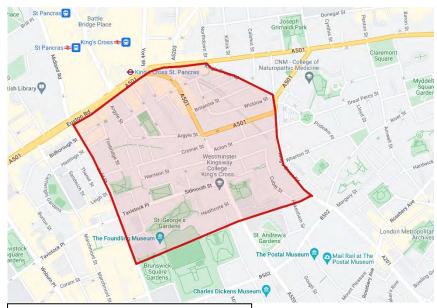
Our consultation website for the proposals, www.300graysinnroad.co.uk, was launched at the start of the consultation on 18 April 2023. It included detailed information on the site, its planning history and

the proposals, as well as a timeline for the project going forward, and a contact us page for residents to leave comments on the proposals and sign up for further information on the project.

Flyer/Newsletter

At the same time as the website was launched, a flyer was sent via door-to-door delivery to 3,767 local addresses around the site on 21 April 2023. The flyer is shown in Appendix C and its distribution area is shown in Appendix A. Both are also shown below.





DISTRIBUTION AREA FOR FLYER



The flyer/newsletter introduced the site and the Applicant, and explained that the project team are beginning to develop early proposals for the site. It invited the public to visit the consultation website to

find out more and give feedback, and also asked them to attend either our in-person exhibition or webinar, with a map on the back page showing the site and the exhibition venue.

Local newspaper advertising

At the same time as the flyer was launched, the applicant also starting an advertising campaign to raise awareness of the consultation locally. An advert was placed in the Camden New Journal, which promoted the website and the dates of the consultation events. The advert ran for one week in the newspaper, in the edition dated Thursday 20 April 2023. The advert is shown in Appendix D.

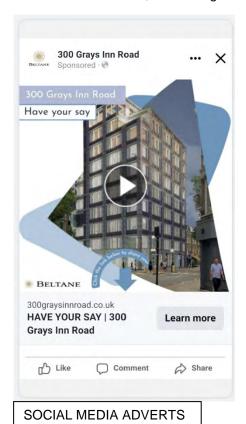


NEWSPAPER ADVERT FOR PRINT AND WEB

Social media advertising



The applicant also undertook social media advertising on Facebook, which ran from 20 April 2023 to 13 May 2023. This promoted the consultation website and public events, and led to 444 click-throughs to the website. Overall, advertising reached over 64,430 people, across a range of age groups.



300 Grays Inn Road X BELTANE Help us shape the future of 300 Gray's Inn Road loin us at our consultation events to find out 300 graysinn road, co, uk THEFT Int. 300graysinnroad.co.uk 300 Grays Inn Road | Learn more Sign up here to attend our... Like Comment Comment Share

SOCIAL MEDIA ADVERTS

Email inbox and freephone line

At the launch of consultation, a freephone line and email address was set up, for the public to write to or speak with the project team regarding the scheme. At all times before planning submission, our consultation inbox and freephone line was monitored to respond to any residents who got in touch with us. The promotional materials included these contact details for members of the public to contact us with any questions or feedback.

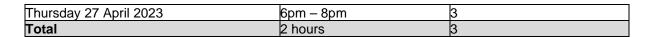
During the consultation the project team have responded to every neighbour or stakeholder who has contacted us regarding the scheme. In total six emails have been responded to, which requested updates on the consultation and requests for meetings from key stakeholders, We have received no phone calls to our freephone line. Feedback from this correspondence is documented in Section 6.

CONSULTATION EVENTS

In-person public exhibition

Our public exhibition was held across one evening on the time and date below. The applicant purposefully held this over an afternoon and evening, alongside an online webinar, to ensure everybody would have a chance to attend.

Date Time Number of attendees



The exhibition was held at Chadswell Healthy Living Centre. The venue is near to the site, part of the Marchmont Community Centre, a prominent community asset for the local area which the site currently sits within, and easy to get to for all nearby residents. In addition, the location was well signposted around the venue with an A-board and posters providing signage. The venue was fully accessible to the disabled, and a map showing the venue location was printed on our flyers and website.

The revised proposals were displayed on a series of 10 exhibition boards (A1 size), setting out in detail the proposals and introducing the site, its constraints and the planning history. These boards are shown in Appendix E. After the exhibition, they were uploaded to our consultation website for the public to view online and download.

Also provided were A5 comments cards (shown in Appendix F) for attendees to leave their contact details and comments. Two comments cards were returned, and the feedback from them is integrated into the summary in Section 6.

Attendees at the exhibition included a staff member from Westminster Kingsway College, who was keen to request involvement with local students at the College within in any opportunities on site to support the proposals

The feedback from the exhibition, both verbal feedback and written feedback on the comments cards, is summarised in Section 6 if this document.

Webinar

Following the exhibition, the applicant held an online webinar on Zoom for those who could not attend the in-person events. This took place on Tuesday 16 May 2023 and was attended by three people.

The webinar was attended by representatives of the applicant, alongside Haptic Architects, Gerald Eve and Collier's, and was chaired by London Communications Agency. After introductions, Haptic Architects gave a presentation on the proposals, which was followed by an extensive Q&A during with the applicant and design team answered questions sent in.

After it took place, a recording of the webinar was uploaded to our consultation website for the public to watch back if they could not attend.

Questions from the webinar focused on overlooking, privacy, impact on daylight/sunlight, and noise travel, alongside a request for more details on the planned materials to be used in the construction. These are covered in more detail in the next section of this document.

6. FEEDBACK



6. FEEDBACK

This section includes a summary and analysis of all feedback received throughout the consultation period.

All comments received were analysed and fed back to the project team to inform the designs for the site. In addition, any questions asked were responded to by the team.

VERBAL FEEDBACK

The public exhibition was attended by three people, at a local community venue near the site. The applicant and project team had discussions with many residents about the details of the proposals during these events.

Verbal feedback was also received at the Zoom webinar, from the discussion held and questions asked by attendees. Verbal and written feedback continued to be sent in via our email inbox and freephone line.

Feedback from all these sources is summarised below:



Height and massing



Design and materials



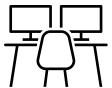
Sustainability and Greening

- · Concern on loss of views owing to increased heights.
- Consideration into loss of mobile phone signals owing to increases in height.
- Concern on reduced daylight to surrounding properties
- On terrace use, there was a request for a higher boundary treatment on terrace use to screen overlooking and noise onto surrounding residential properties.
- Concern on increase in noise levels from courtyard area.
- Concern on overlooking from windows into surrounding properties.
- Support on the design of the scheme.
- Request for as much greening as possible.
- Request for no steel or glass structures.
- Consideration for using a cross laminated timber (CLT) frame.





- **Housing Needs**
- Request for as much housing, particularly social housing, in the area.
- · Request for as much affordable housing.



- Employment opportunities offered by the proposals for surrounding Colleges.
- Support for the commercial opportunities this will bring to the area.

Commercial Opportunities



 Request for consideration to the Acton Street crossing and the need for one.

Traffic



Social Value

- Employment opportunities offered by the proposals for surrounding Colleges.
- Support for the commercial opportunities this will bring to the area.

7. RESPONDING TO FEEDBACK

7. RESPONDING TO FEEDBACK

At the end of the public consultation, LCA reported all feedback received back to the design team for review and consideration.

The feedback from the consultation is set out in Section 6. Other common topics raised during public consultation, and the applicant's response, are shown in the table below.

Summary of common feedback theme	Applicant response
OVERLOOKING AND ENSURING PRIVACY	 The proposals provide outside space for both commercial and residential buildings for the wellbeing of tenants and office workers who will occupy this site, in the event of a successful planning application. We are keen to ensure these amenities remain for the application, but we also understand the needs of current surrounding residents with concern for their privacy. Therefore, our design team have ensured that terraces on the eighth and ninth floors of the commercial building have been screened from directly facing residential properties on Frederick Street and will be ensuring further greening and potential further screening will be used on these terraces to minimise overlooking. A higher boundary treatment is proposed at the rear of the site has been included to
CONCERN ON REDUCED SUNLIGHT	We have carried out a Daylight/Sunlight Assessment and the impact of the proposals will see minor alterations to neighbouring residents. This will be included as part of the planning application documents.
MOBILE PHONE SIGNAL	In the event of a successful planning application, we will be working with representatives from the local area in a Construction Working Group (CWG) and with a Construction Management Plan (CMP) to ensure that surrounding residents and businesses have an opportunity to voice any concerns.
NOISE REDUCTION	 The proposals provide outside space for both commercial and residential buildings for the wellbeing of tenants and office workers who will occupy this site, in the event of a successful planning application. We are keen to ensure these amenities remain for the application, but we also understand the needs of current surrounding residents with concern for the impact noise travel will have on their homes. Therefore, our design team have ensured that terraces on the eighth and ninth floors of the commercial building have been screened from directly facing residential properties on Frederick Street and will be ensuring further greening and potential further screening will be used on these terraces to minimise noise impact.

1	
	 A Residential Amenity Management Plan has been prepared and submitted with the application that sets out measures to control hours of use and other matters. An acoustic assessment of the terrace has been carried out which confirms that the noise will not be noticeable.
REQUEST FOR HOUSING / SOCIAL HOUSING	Owing to the size of the development, the addition of seven apartments in the building on Acton Street is under the threshold for providing social housing on site at Acton Street in line with Camden's Local Plan policies H2 and H4, a policy compliant financial contribution will be made to the affordable housing fund.
	 The developer recognises the benefit of providing market housing on site and believes that the addition of housing on site at 300 Gray's Inn Road will benefit the local area's demand for housing needs.
	 Our proposals are built on the foundation that 'the greenest building is one that already exists'.
GREENING AND SUSTAINABILITY MEASURES	 We're proposing retaining the building's existing structure and aspiring to reuse as much of the existing fabric within the new development.
	 We're also proposing using passive heating and cooling to minimise energy demand, using a low carbon structural solution for the extensions, and developing a facade that optimises its environmental performance to drive down energy demand.
	 The site includes heat pumps for low-carbon heating and cooling, a low Embodied carbon structural frame, and the retention of as much of the structure as possible – around 88%.
COMMERCIAL OPPORTUNITIES	
<i>T</i>	 We welcome any engagement opportunities to work with the surrounding community and have been in touch with Westminster Kingsway College to discuss options, should we receive a successful planning application. We believe these proposals offer employment benefits during construction and upon completion to the local community and we will be engaging in options to offer apprenticeships and community benefits on site during these times.
1777 000 144	Consideration was given to the concern for the Acton Street crossing and the need for one.
Traffic	



Social Value

- The team responded that they were liaising with Westminster Kingsway College on potential work experience in the construction and built environment industry.
- The development would also provide construction apprenticeships.

8. CONCLUSION



8. CONCLUSION

The Applicant has undertaken an extensive programme of consultation including pre-application discussions with the London Borough of Camden, as well as meetings with the site's neighbours, political stakeholders, the local community and interest groups through public consultation.

The Applicant has carried out a thorough consultation with a range of digital and physical consultation methods, including face-to-face consultation events and online meetings. Our comprehensive project website was kept updated with the latest information on the scheme and an email address and phone number to contact the Applicant and the project team. Virtual and in-person meetings, webinars and in-person exhibitions were held at a range of different dates and times, to ensure everyone had a chance to participate in the consultation.

The consultation was well advertised with a mix of digital and physical promotion, including flyers, letters, social media advertising, newspaper adverts and email. Those who were not confident using the internet were sent a flyer on the proposals via the post and were able to give feedback over the phone, in written form or at our in-person public exhibition if they preferred.

Overall, the feedback received shows that there is support for the key elements of the proposals: the increase in housing and the redevelopment of the site to improve the quality of the local area. There is also support for the redevelopment of commercial space and requests from local educational facilities to support their students with the opportunities of this construction programme. Sustainability measures are supported by the local community with requested for as much urban greening as possible and using sustainable construction measures, which the proposals support.

The key areas requested for further examination: ensuring privacy is maximised and overlooking and nose minimised, have been responded to by the project team, who are considering measures to screen outside areas and reduce impact for local residents.

The Applicant has committed to maintaining close engagement with the local community after the application has been submitted and throughout the planning and construction process. This will include the establishment of a Construction Working Group (CWG) to manage construction and ensure the community are kept updated on the progress of the scheme.

The Applicant would like to thank all members of the local community and others who have taken the time to participate in the consultation, ask questions and provide feedback to the project team.