

Planning Statement.

King's Cross Methodist Church, 58A Birkenhead Street, London,
WC1H 8BW.

On behalf of West London Mission Circuit of The Methodist
Church (WLM).

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1. Introduction.

- 1.1. This Planning Statement has been prepared on behalf of The West London Mission Circuit (WLM) of The Methodist Church ('the Applicant') in support of an application to the London Borough of Camden (LBC) ('the Council') for full planning permission at King's Cross Methodist Church, 58A Birkenhead Street, London, WC1H 8BW ('the Site') for the following proposed development:

"Part demolition, extension and reconfiguration of the existing building to provide replacement church (Use Class F1) with ancillary café and student accommodation (Sui Generis), together with associated plant, cycle and refuse storage."

- 1.2. The King's Cross Methodist Church is one of the WLM circuit of Methodist churches. WLM focus on learning, worshipping, caring, servicing and evangelism in ways that reflect Methodist tradition and their own identity and history.
- 1.3. This planning application follows pre-application engagement with Planning Officers of the London Borough of Camden.
- 1.4. The proposed development will comply with the adopted Development Plan by reproviding and enhancing the existing church which provides a key community facility for church members as well as other local community users; in addition to reproviding student accommodation to an enhanced specification that meets modern standards. Furthermore, economic, social and physical regeneration benefits would be created, receiving additional support from the National Planning Policy Framework (2023), which is a material consideration of significant weight.
- 1.5. A suite of technical reports has been submitted as part of this application. The objective of this Planning Statement is to provide the reader with context for the proposed scheme, directing them to relevant issues and identifying where further information is available on each matter. This Statement seeks to evaluate the challenges, reveal the opportunities, and identify the benefits to be delivered by the grant of planning permission.
- 1.6. The Statement is structured as follows:
- **Section 2** provides a description of the site and surrounding context;
 - **Section 3** sets out the planning history of the Site and notable developments within the vicinity of the Site;
 - **Section 4** details the pre-application consultation and engagement undertaken;
 - **Section 5** provides a description of the development proposals (including Community Use Plan);
 - **Section 6** sets out the decision-making context in terms of the adopted and emerging development plans and other material considerations;
 - **Section 7** assesses the proposals against relevant planning considerations (including Affordable Student Accommodation Statement);



- **Section 8** provides an overview of the anticipated draft Heads of Terms (including Employment and Training Strategy);
- **Section 9** summarises and concludes the report.

2. Site and Surrounding Context.

2.1. This section provides a description of the Site and its surrounding context.

Application Site

2.2. The application site is situated within the administrative boundary of the London Borough of Camden ('the Council'), who act as Local Planning Authority (LPA).

2.3. The application site extends to 0.08ha and is located to the south of King's Cross Railway Station, as shown in the image below.



Figure 1: Aerial Image of the Site and Surrounding Context

2.4. The site is immediately bound by Birkenhead Street to the east, neighbouring residential properties to the north and south, and Crestfield Street to the west.

2.5. The building complex comprises the main King's Cross Methodist Church (KXMC) in addition to Methodist Chaplaincy House (MCH) which has provided student accommodation for a community of students for over 40 years. This was formalised in 1979 when the Council granted planning permission (Ref: CTP/L14/9/A/27716) for the "change of use of the first and second floors from a hostel and training centre to a hostel for full time students". The existing student accommodation comprises 22no. student rooms and ancillary warden's accommodation.

2.6. The Crestfield Street frontage (western end) of the application site building extends to 2.5 storeys. Whereas, the Birkenhead Street (eastern end) frontage of the application site building extends to 3 storeys plus basement. Both are shown below. The Birkenhead Street element of the building comprises the chapel, which was originally built between 1823-25. The chapel underwent significant redevelopment in the 1950s and 1970s. A full account of the modifications are detailed in the Heritage and Townscape Statement.



Figure 2: Image of the Application Site as viewed from Birkenhead Street



Figure 3: Image of Application Site as viewed from Crestfield Street

- 2.7. In terms of the existing layout, the basement floor contains a multi-purpose room, children's playroom, meeting rooms, store rooms, a boiler room and a kitchen. There are lightwells provided to both northern and southern ends of the Site. Access to the north lightwell is directly from the basement floor level whereas the southern lightwell can only be accessed externally via the southern doorway located on Birkenhead Street.



- 2.8. The basement floor does not include the area underneath the Crestfield Street frontage. It sits within the central area and that facing Birkenhead Street. The floor to ceiling height is restricted to approximately 2.6m.
- 2.9. The ground floor is predominantly occupied by the Church and its associated facilities. The ground level has the highest floor to ceiling height of approximately 3.5m. The Birkenhead Street access opens to an entrance lobby accessible via a set of stairs. The entrance lobby leads to the main church hall. There are half staircases on both northern and southern ends of the building which provides w/c's, close to the Birkenhead Street elevation. There is also another kitchen located adjacent to the main church hall. The Crestfield Street entrance opens up to the International Services Room and there is a lounge, office and w/cs available adjacent to this.
- 2.10. Access to the uppers floors can be made via staircases available near both entrances.
- 2.11. The first floor provide students rooms and associated facilities such as a dining rooms, a kitchen, other shared rooms as well as warden's flat and an office. The first floor makes use of the entire floor.
- 2.12. The second floor contains a roof void fronting Crestfield Street, which explains the height difference with Birkenhead Street. Hence, the second floor does not make use of the floor and contains student rooms and w/cs, bathrooms, a computer suite and library, linen room and a roof terrace facing south.
- 2.13. The application site can be accessed both from Birkenhead Street to the east, which forms the main entrance, and Crestfield Street to the west which provides secondary access. The main entrance for students is via Birkenhead Street but they could exit via Crestfield Street. Church users and staff utilises the Crestfield Street entrance during the weekdays whereas both entrances are utilised on Sunday congregations.
- 2.14. Internally, the buildings are connected by a series of rooms, halls and circulation spaces, which are all used by KXMC and the ancillary MCH. The buildings are in a poor state of repair; the layout of the spaces and rooms within the building are dated; and they lack the modern requirements for the future aspirations and current practices of the KXMC.
- 2.15. The main hall is not large enough to accommodate the growing church congregations; the circulation space is poor and creates an inefficient layout; and the multiple levels of the building restrict accessibility to the elderly/children/people with mobility impairments.
- 2.16. Furthermore, the redevelopment presents an opportunity to improve the environmental performance of the accommodation, through the replacement of windows, sanitary ware, lighting and kitchens to provide modern, energy efficient equipment.
- 2.17. Refuse bins are located on Birkenhead Street frontage, therefore refuse collection for both the church and the student accommodation is via Birkenhead Street.
- 2.18. The site is identified in LBC's adopted Policies Map (2017) as falling within the designated Central London Area and King's Cross St Pancras Conservation Area.
- 2.19. The site is also adjacent to the Primary Frontage of Kings Cross Central London Frontage (one of Camden's designated Centres), which adjoins the Site from the north-western boundary.



- 2.20. The site is located within King's Cross St Pancras Conservation Area. The building is not statutory or locally listed. However, there are a number of Grade II listed buildings located within the vicinity of the Site, including the immediately adjacent building to the north (known as 'Number 59 Birkenhead Street and attached railings') and to the south ('Number 54-58 Birkenhead Street and attached railings' and '1-5 Crestfield Street and attached railings'). Numbers 1-7 Birkenhead Street and attached railings on the opposite (eastern) side of Birkenhead Street to the site is also Grade II listed.
- 2.21. The site falls within Flood Zone 1 (as shown on the Environment Agency's flood risk map), which indicates the lowest risk of flooding.
- 2.22. In terms of public transport, the Site has the highest PTAL rating of 6b, with a number of bus and train services easily accessible by foot from the Site.

Surrounding Area

- 2.23. The surrounding area is characterised by various residential buildings, hotels and small offices, in addition to retail uses at street level along Euston Road to the north of the site. King's Cross St Pancras international station is located at an easy walkable distance from the Site to the north-west.
- 2.24. Crestfield Street is largely dominated by the highly decorated return of No. 11 Euston Road and the two storey brown brick building rear elevation of the KXMC. In contrast, the Birkenhead Street has a finer grain and a domestic character akin to the terraced homes and guesthouses on either side of the Street.
- 2.25. To the south of the application site is Argyle Square, which forms an important part of the Bloomsbury Conservation Area. The Square was one of the last land parcels to be developed in the 1830's and 1840's, the mature trees within the Square are noted for their landscape contribution within the urban environment.
- 2.26. Whilst the areas to the south of the application site are noted for their historic character and conservation, the area to the north comprises Euston Road, beyond which is the entrance to King's Cross Station and King's Cross St Pancras Underground Station. This area is undergoing major transformation allied to this major transport infrastructure node. In particular the upcoming development of part 5, part 10 storey building at Belgrove House, located on Crestfield Street (see planning history below) will make a notable change to the local character.

3. Planning History.

Application Site Background

3.1. The relevant planning history for the site is set out as follows:

Application Reference	Description	Decision
No. 58A Birkenhead Street (King's Cross Methodist Church)		
2015/7013/P	Demolition and redevelopment to provide a replacement church with community facilities (Class D1), a replacement Methodist Chaplaincy House with 25 non-self contained student rooms (Sui Generis), and 11 residential self contained flats (Class C3) plus associated plant, cycle storage and refuse storage.	Refused 26 July 2019
9501822R2	The provision of new steps, an iron fence, lighting, gates and paving, as shown on drawing number 11/95.05 Rev A and 11/95.03 Rev B.	Granted 10 May 1996
CTP/L14/9/A/27716	Change of use of the first and second floors from a hostel and training centre to a hostel for full time students.	Granted 05 May 1979
CTP/L14/O/A/10705	Alterations to elevations to form canopy over the entrance at the King's Cross Methodist Training Centre and Mission.	Granted 14 July 1971

3.2. The most recent application ref. 2015/7013/P sought to fully demolish the entire existing building and redevelop the site to provide a replacement church and student accommodation, as well as residential (Class C3) use. The application was refused, namely on grounds that the loss of the entire building would harm the conservation area; the height, bulk, scale, design would result in an increased sense of enclosure harming the setting of adjoining listed buildings; concerns over daylight, sunlight and overlooking impacts on neighbouring properties; poor outlook and privacy for the student accommodation; concerns regarding impact of excavation works on Northumberland Hotel in Crestfield Street; failure to ensure proper standards of sustainability including BREEAM targets; absence of an adequate air quality report and inadequate cycle parking provision.

3.3. The proposed development now put forward has evolved considerably since this time. Residential use is no longer proposed, nor is wholesale demolition of the site. The proposal simply seeks to reprove the existing church and provide additional student accommodation by focusing predominantly on retrofitting and extending the building. The current scheme has had due regard to the grounds of refusal (where relevant), and the design has evolved through subsequent pre-application engagement with Camden Officers, as set out in further detail in this Planning Statement and the Design and Access Statement.

Surrounding Area

3.4. Other notable developments in the surrounding area are set out below.

Belgrove House, Belgrove Street London WC1H 8AA

3.5. The site is located on the western side of Crestfield Street, directly opposite the Application Site. Mixed-use commercial redevelopment of Belgrove House was approved in 2021, with subsequent design amendments approved thereafter, as set out below. Construction has commenced, with the existing building demolished.

- **2020/3881/P** – *"Redevelopment of Belgrove House as a part 5 part 10 storey building plus 2 basement levels for use as office and research and laboratory floorspace; with café, flexible retail and office floorspace at ground floor; an auditorium at basement; incorporating step free entrance to Kings Cross Underground station in place of two entrance boxes along Euston Road; together with terraces at fourth and fifth floor levels, servicing, cycle storage and facilities, refuse storage and other ancillary and associated works."* Granted permission on 1 November 2021.
- **2022/1515/P** – *"Variation of condition 2 (approved drawings) of planning permission 2020/3881/P granted 01/11/2021 for the 'Redevelopment of Belgrove House as a part 5 part 10 storey building plus 2 basement levels for use as office and research and laboratory floorspace; with café, flexible retail and office floorspace at ground floor; an auditorium at basement; incorporating step free entrance to Kings Cross Underground station in place of two entrance boxes along Euston Road; together with terraces at fourth and fifth floor levels, servicing, cycle storage and facilities, refuse storage and other ancillary and associated works'; NAMELY, minor design changes to external façade treatment and Euston Road entrance; changes to cycle store entrance at ground floor and public realm; internal alterations to layout across various floors; and changes to PVs and plant layout at roof level (summary)." Granted permission on 20 February 2023.*

3.6. The approved building will extend to 10 storeys, a significant increase from the former 3 storey building. The extract below shows the approved development fronting Crestfield Street.

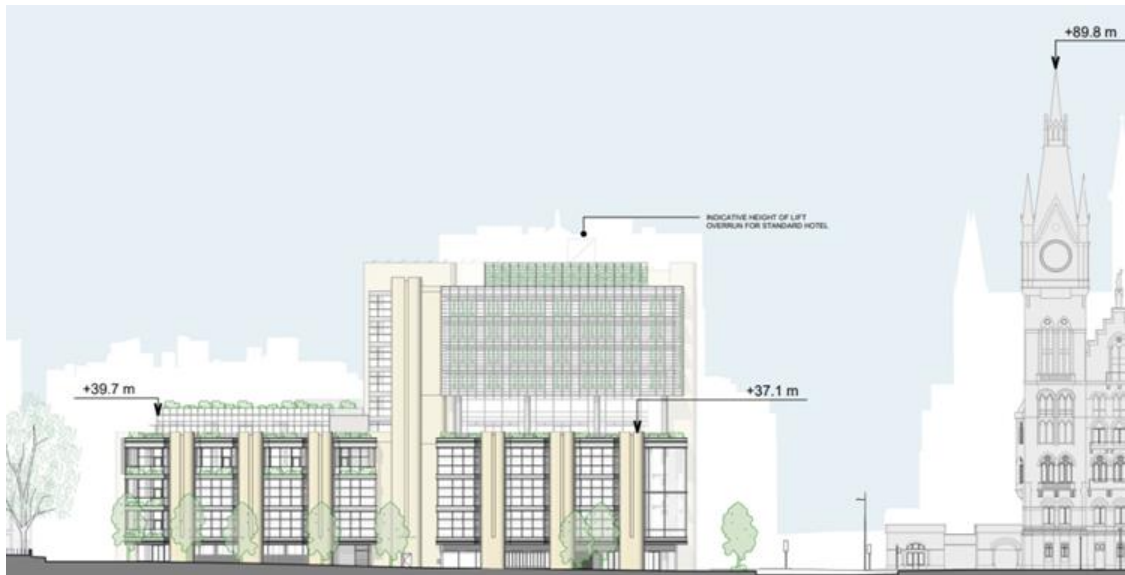


Figure 4: Extract of Approved Eastern (Crestfield Street) Elevation of Belgrove House Redevelopment Scheme

Euston Tower, 286 Euston Road London NW1 3DP

- 2023/5240/P** – "Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work." Application was registered on 21 December 2023 and is currently pending determination.

4. Pre-Application & Community Engagement.

Pre-Application Enquiry

- 4.1. Pre-application engagement was undertaken with Camden Officers, including meetings in August and September 2023 for redevelopment of the site to deliver a re-provided church, with new co-living accommodation above (ref. 2022/5450/PRE). The design of the proposal was amended as a result of feedback received.
- 4.2. Further pre-application engagement was undertaken in May 2024 with an altered proposal for re-provision and extension of the church with re-provision of student accommodation at the upper levels, rather than new co-living accommodation.
- 4.3. A further pre-application meeting was held with Planning and Conservation and Design Officers on 8th May 2024. Officers confirmed they were supportive of the principle of the proposed development and provided further feedback on the design.
- 4.4. Pre-application feedback gave rise to the following considerations:
 - **Principle of Development** – Re-provision and extension of existing church and student accommodation confirmed as acceptable in this location.
 - **Design and Scale** – The proposed scale of development is acceptable and officers supported the additional third floor and encouraged reinstatement of original pediment form to roof to signify the church use of the building. Officers welcomed the revised design in the May 2024 iteration. Materiality and tones of façade elements should be further clarified in any submission.
 - **Heritage Impact** – Officers welcomed the retention of the Birkenhead Street façade and specified windows and columns that they wish to see retained (which has been achieved). Officers supportive of the principle of demolishing the Crestfield Street façade and encouraged bolder more playful design to the new redeveloped element. Conservation Officer requested that the north and south facades including window locations were retained during site visit.
 - **Cycle Parking** – Officers requested that the location and provision of visitor cycle parking is clarified.
- 4.5. The Applicant also met with the Metropolitan Police’s Designing Out Crime Officer. The design evolution of the scheme and how it has been informed by the pre-application engagement with the Council and Designing Out Crime Officer is detailed further within the Design & Access Statement.

Community Engagement and Consultation

- 4.6. Pre-application engagement is valuable for the evolution of a development, and it is recognised in the National Planning Policy Framework (2023) at paragraph 39 that it has the potential to improve the efficiency and effectiveness of the planning application process for all parties.



- 4.7. Prior to the submission of this application the Applicant has consulted with the local community.
- 4.8. Newsletters were circulated in the area surrounding the site which described the application proposals, invited neighbours to attend public consultation events held at the church, and encouraged recipients to share their views by writing or submitting them online via the dedicated website.
- 4.9. The public consultation events were held on 24 and 25 November 2024 at the church and were well-attended. A Statement of Community Involvement accompanies the planning application and provides further detail on the public consultation exercise including feedback received, which overall was supportive of the proposal.
- 4.10. Overall, the pre-application process has provided an opportunity to highlight and address potential issues prior to finalisation of the submitted scheme.

5. Development Proposal.

5.1. The application seeks planning permission for the following:

"Part demolition, extension and reconfiguration of the existing building to provide replacement church (Use Class F1) with ancillary café and student accommodation (Sui Generis), together with associated plant, cycle and refuse storage."

5.2. The proposals seek to extend the existing building on site to re-provide the church with much improved and modernised facilities, as well as to re-provide student accommodation to a modern standard. Unlike the previously refused scheme which sought demolition of the entire building, only the 1950s western wing of the building (known as Mission House) will be redeveloped. The majority of the existing building (which includes its more historic elements, with the original church dating from 1825 sited to the centre/east of the site) will be retained and reconfigured and retrofitted.

5.3. In summary, the proposed development will provide the following:

- The existing Church will be re-provided with enhanced and modernised facilities including a main church hall, meeting/community rooms and an ancillary café, admin office and WCs set across the lower ground, ground and part first floors.
- A total of 33 student rooms (net increase of 11 rooms) comprising a mix of single and twin study rooms and studios and 2no. disabled accessible rooms (one single study room and one studio), all provided with en-suites, set across part first, second and third floors.
- Purpose-built shared student facilities including a communal living / kitchen / dining room, a communal terrace at third floor level and laundry room.
- Cycle parking on the lower ground and ground floors providing a total of 28 secure long stay cycle spaces and 12 short stay cycle spaces.

5.4. The full extent of the proposals is shown on the submitted drawings and described within the accompanying Design & Access Statement.

Church: Community Use Plan

5.5. The proposal will re-provide the King's Cross Methodist Church with improved space that meets modern requirements and enhances accessibility of the building to meet the needs of all users.

5.6. The Church will continue to welcome people from all backgrounds. The proposal will provide enhanced modern facilities with the new church hall and meeting spaces able to accommodate greater capacity to facilitate future growth of the church. There will also be a church café and dedicated cycle parking. As well as benefitting parishioners, the church spaces can be used by registered community space users on request.

5.7. The Church has established a strong community with a wide range of religious, community and charity meetings and activities taking place at the Church including (but not limited to):



- Services of worship (in Chinese, Mandarin and English)
- Fellowship groups: many different meetings throughout the week including those aimed at students and young adults, young professionals and disciple class
- Friday Club – a weekly drop-in for the homeless, vulnerable and isolated, providing welfare support to those in need. The Friday Club is run as a partnership between KXMC and C4WS (Council of Camden Churches Cold Weather Shelter) Homeless Project, part of CARIS Camden. It has grown in the numbers of people attending so that it is now about 50 people. The services offered have increased and this year the Quaker Mobile Library for the Homeless has started regular visits.
- Support to gambling addicts – KXMC partner with an independent charity The Christian Centre for Gambling Rehabilitation to run the centre at KXMC – we help gamblers who have come to Christ to re-assess their values, re-establish their life, restore relationship with their families, and, where authorised to do so, manage their debt repayments.
- A Women’s Drop-in for friendship and support, plus street outreach support to local female sex workers. The project is run by a Catholic Womens Order called “The Sisters of Charity” operating from KXMC. It is led by Sister Kay and volunteers who provide refreshments, fellowship and ministry.
- Winter Night Shelter. KXMC hosts the Winter Night Shelter run by C4WS on one, sometimes two evenings a week, from November to March, helping homeless people in Camden, offering a safe and welcoming space, a shower, food, sleep and help with rebuilding their lives.
- In addition, the following community groups have also established meetings at KXMC:
 - 12-step groups (Alcoholics Anonymous and similar self-help groups);
 - Age Concern Camden;
 - St Mungo’s;
 - Chaplains to hospices, prisons, armed services;
 - Anglo-German Family History Society;
 - Thank God It’s Friday – TGIF – a Christian Deaf Group;
 - Methodist Women in Britain (MWiB) – regional groups;
 - Regional Training for Hospice Staff;
 - Go Sign – Christian Deaf group; and
 - Christmas Carol Service organised by a Christian staff group at Camden Council.
- Various events and services during religious celebrations (Christmas, Easter)

- 5.8. KXMC have ambitious plans and projects for the future. It is acknowledged that the ongoing regeneration of King's Cross will bring substantial benefits to the area and it is imperative that the existing and vulnerable communities continue to be catered for in an easily accessible location with facilities that are fit for purpose. In order to address the needs of the new community and the existing community, KXMC intend to intensify and enhance the social role provisions it offers to include:

Community – creating a hub/safe space for the community in this part of London

- Building on what we already offer to the community particularly those who come to Chicken Chow Mein and/or Friday Club;
- Build further upon the current student fellowships.

Location – the closest church to King's Cross and St Pancras Stations.

- Crestfield Street is a busy route providing access from the stations to the communities to the south;
- Breakfast meetings for students, staff and tutors, the local community – with a speaker;
- Morning prayers for commuters; and
- A Quiet Space in this busy area available all day for personal prayer and reflection.

Establish New Partnerships to reach out to new groups

- Midweek concerts – In partnership with local colleges/ universities offering space for performers and space for people to bring their lunch, and enjoy the break from work;
- Exhibition space – In partnership with local colleges/ universities, artists, poetry readings;
- Enhancing opportunities with major employers in the area to work with local charities as part of their corporate social responsibility – one already supports the Night Shelter and Friday Club, donating the profits from one of their projects; and
- Working with other charities on projects such as Christian Aid Week and Fairtrade Fortnight.

Local community

- In partnership with the local communities, explore the possibilities of the local community using the space.

- 5.9. The new main church hall is capable of accommodating up to 300 attendees, and the chapel/community room on the first floor can accommodate up to 80 attendees. This is in addition to the small meeting rooms on lower ground level.

- 5.10. The church and student accommodation will employ 14 staff including 2 ministers, 2 full time church workers, 2 church café staff, a building manager, a lettings manager, and 6 part time



cleaners. The proposed main standard opening hours of the church will be 8am to 6pm, with evening use as required (e.g. for local community use/meetings, or during religious celebrations).

- 5.11. In respect of management measures, the church spaces will be let and managed professionally in a similar manner to the meeting room and conference space run by the Wesley Hotel – another Methodist Church owned property near Euston Station.

Student Accommodation

- 5.12. The existing student accommodation, particularly the student rooms are small and dated, without private hygiene facilities. The new student accommodation has been purposely designed to meet modern standards and expectations, meeting or exceeding adopted design guidance and including the provision of ensembles and space for social interaction and studying together.
- 5.13. The accommodation will continue to be managed and operated by the Church and provide somewhere for students to live as part of a diverse community with a Christian ethos. The student community is predominantly international and the students are studying at different colleges and universities in Central London. The proposal will continue to provide a 'home away from home' where students live as one community, and students will be expected to share in responsibilities to encourage a sense of belonging and be responsible to and for each other.

Amount

- 5.14. The proposal includes extension of the existing lower ground level (basement level), as well as the provision of an additional storey, in order to provide enhanced church facilities and student accommodation. The majority of the existing building, including the original parts fronting Birkenhead Street will be retained and reconfigured internally. Only the 1950s western wing of the building fronting Crestfield Street (known as Mission House) will be demolished and rebuilt. In total the proposal will result in a net increase of 895sqm of floorspace.
- 5.15. The Church facility, currently set across ground and lower ground floors, will be re-provided on the lower, ground and part first floors with an ancillary café at ground level. The lower ground floor will be extended westwards towards Crestfield Street to provide additional floorspace. The proposal will result in a net increase of 330sqm of church floorspace, totalling 1,147sqm.
- 5.16. The proposals will replace the existing student accommodation set over first and second floors comprising 22 rooms, with 33 purpose-built student rooms set over part first, second and the new third floor level. The existing student accommodation is substandard, being very dated and each room being very small, without private hygiene facilities. The new student rooms will be much larger to meet and exceed standards, incorporating ensembles and study spaces within the rooms, as well as dedicated communal space at third floor level. The proposal will result in a net increase of 565sqm of student accommodation floorspace, totalling 1,371sqm.

Internal Layout



- 5.17. At present, the church is set over the ground and lower ground floors, with student accommodation at first and second floors.
- 5.18. The main church hall will continue to be situated at ground level, however will be enlarged. The western end of the building will accommodate a new ancillary café, as well as a dedicated bin store fronting Crestfield Street for ease of collection. The stairwell area will also accommodate lifts (where currently there are none) which will significantly enhance accessibility of the building. The eastern end of the building will be refurbished and reconfigured, with a new long-stay cycle parking store, and short-stay cycle parking installed externally to the front of the building. The northern and southern lightwells will provide garden areas.
- 5.19. The lower ground currently incorporates ancillary space for the church. The proposal includes extension of the lower ground level toward Crestfield Street as well as to the sides of the building in order to accommodate church meeting spaces, as well as a dedicated long-stay cycle store, plant rooms, an admin room and WCs. A kitchen will also be re-provided and a foyer/breakout space will be provided towards Birkenhead Street.
- 5.20. At first floor level, the re-built western wing will accommodate new church community rooms and chapel for use by church visitors, staff and the wider community. The remainder of the first floor will provide 12no. student rooms comprising of single/twin spaces with ensuites, as well as a laundry room.
- 5.21. At second floor level, 17no. student rooms of single/twin spaces with ensuites will be provided.
- 5.22. The proposals seek to provide a new storey at third floor. This will incorporate two 'wings' at either end of the building, centred around a communal roof terrace. This will provide 4no. student rooms; 3no. at the eastern wing and 1no. at the western wing, together with a large purpose-built communal living/kitchen/dining space and plant room in the western wing. The stepped gabled roofs fronting both Birkenhead Street and Crestfield Street will accommodate solar photovoltaic panels.

Materials and Landscaping

- 5.23. Details of the proposed materials and the landscaping strategy is set out within the Design & Access Statement.
- 5.24. The proposals will retain the existing facing brickwork on the lower floors, whereas new brickwork on the new upper floor is proposed to complement the existing and provide a contrast for visual interest. The existing stone and plaque will be cleaned and retained.
- 5.25. The existing windows will be replaced with new improved thermal performance glazing and the existing window surrounds will be cleaned and repainted. New metal windows will be provided with a bronze finish frame to match the new brickwork as well as new metal guarding will also be in bronze finish frame. The balustrade will comprise of metal with bronze finish to match the windows.
- 5.26. On the Birkenhead Street frontage, the existing arch window will be removed and replaced by a new stone cladded portal and signage. The existing door opening on the corner of the Birkenhead Street frontage will be removed and reinstated with new matching brickwork.



5.27. In terms of landscaping, the proposals will provide new planting to the northern and southern lightwell gardens on the ground floor as well as to the third floor communal roof terrace, through incorporation of planters along the northern and southern edges. This will provide enhanced urban greening at this urban site, which currently does not feature any.

Access

5.28. The proposed scheme has been designed to meet the provisions of Part M Volume 2.

5.29. The Site will continue to provide access via both Birkenhead Street and Crestfield Street. The primary access to the church will remain via Birkenhead Street. A new platform lift is proposed to enable level access to all from this entrance, which currently incorporates steps which restricts access for disabled users and those with pushchairs.

5.30. A separate dedicated access is proposed on Crestfield Street for the student accommodation, which will also provide access to the first floor community room. A new access is also proposed from Crestfield Street for the church café.

5.31. The proposals will ensure the entire building is accessible to all, and separating the main church access from the student accommodation will minimise congestion between users.

Parking

5.32. The existing church and student accommodation does not provide any cycle parking. The proposal will be a great improvement on this, providing dedicated short and long-stay cycle spaces.

5.33. Long-stay provision will be in the form of a dedicated store at lower ground floor level accommodating 25no. spaces for the student accommodation and a small store at ground level accessed from Birkenhead Street accommodating 3no. spaces for church users.

5.34. There are a total of 12no. short-stay spaces proposed through Sheffield stands to the front of the building on the east (Birkenhead Street) side for visitors.

5.35. There is no car parking proposed due to the site constraints, and given the highly sustainable location of the site.

Waste and Recycling

5.36. A new dedicated refuse and recycling store to serve the church and student accommodation will be created through the proposals. This will be located at ground level, with direct access to Crestfield Street.

6. Planning Policy.

- 6.1. This section provides an overview of the key national, regional, and local planning policies which are of relevance to the consideration of the proposed development
- 6.2. The Planning and Compulsory Purchase Act (2004) requires that planning applications are determined in accordance with the 'Development Plan' unless material considerations indicate otherwise (Section 38).
- 6.3. The **Development Plan** for the Site comprises the following:
- The London Plan (2021)
 - Camden Local Plan (2017)
- 6.4. Other **Material Considerations** include:
- The National Planning Policy Framework (NPPF) (2024)
 - National Planning Practice Guidance (PPG).
- 6.5. There are also a number of Supplementary Planning Documents (SPDs) and Guidance (SPGs) published by the London Borough of Camden which provide guidance for development proposals such as these, including (but not limited to):
- Camden Planning Guidance Access for All (March 2019)
 - Camden Planning Guidance Amenity (January 2021)
 - Camden Planning Guidance Basements (January 2021)
 - Camden Planning Guidance Community Uses, Leisure Facilities and Pubs (January 2021)
 - Camden Planning Guidance Design (January 2021)
 - Camden Planning Guidance Energy Efficiency and Adaptation (January 2021)
 - Camden Planning Guidance Student Housing (March 2019)
 - King's Cross / St. Pancras Conservation Area Statement (2003)
 - The London Plan Guidance documents, including the Optimising Site Capacity: A Design-Led Approach (June 2023), Energy Planning Guidance (2022), Purpose Built Student Accommodation London Plan Guidance and draft Fire Safety LPG (2022) are also of relevance.

Site Designations

- 6.6. Camden Local Plan Policies Map (2017) shown shows that the Site is located within the King's Cross St Pancras Conservation Area and the Central London Area.

Relevant Development Plan Policies

- 6.7. The relevant policies of the Development Plan applicable to the consideration of the proposed development are listed below.

The London Plan (2021)

- Policy GG1 – Building Strong and Inclusive Communities
- Policy GG2 – Making the best use of land

- Policy GG3 – Creating a healthy city
- Policy GG4 – Delivering the homes Londoners need
- Policy GG6 – Increasing efficiency and resilience
- Policy D1 – London’s form, character and capacity for growth
- Policy D3 – Optimising site capacity through the design-led approach
- Policy D4 – Delivering Good Design
- Policy D5 – Inclusive Design
- Policy D10 – Basement Development
- Policy D11 – Safety, security and resilience to emergency
- Policy D12 – Fire Safety
- Policy D13 – Agent of Change
- Policy D14 – Noise
- Policy H1 – Increasing housing supply
- Policy H15 – Purpose Built Student Accommodation
- Policy S1 – Delivering London's social infrastructure
- Policy HC1 – Heritage, Conservation and Growth
- Policy G1 – Green Infrastructure
- Policy G5 – Urban Greening
- Policy G6 – Biodiversity and Access to Nature
- Policy SI1 – Improving Air Quality
- Policy SI2 – Minimising Greenhouse Gas Emissions
- Policy SI3 – Energy Infrastructure
- Policy SI4 – Managing heat risk
- Policy SI5 – Water Infrastructure
- Policy SI7 – Reducing Waste and Supporting the Circular Economy
- Policy SI12 – Flood Risk Management
- Policy SI13 – Sustainable Drainage
- Policy T1 – Strategic Approach to Transport
- Policy T2 – Healthy Streets
- Policy T3 – Transport Capacity, Connectivity and Safeguarding
- Policy T4 – Assessing and Mitigating Transport Impacts
- Policy T5 – Cycling
- Policy T7 – Deliveries, Servicing and Construction

Camden Local Plan (2017)

- Policy G1 – Delivery and Location of Growth
- Policy H1 – Maximising Housing Supply
- Policy H4 – Maximising the Supply of Affordable Housing
- Policy H9 – Student Housing
- Policy C2 – Community Facilities
- Policy C5 – Safety and Security
- Policy C6 – Access for All
- Policy A1 – Managing the Impact of Development
- Policy A3 – Biodiversity
- Policy A4 – Noise and Vibration
- Policy A5 – Basements
- Policy D1 – Design
- Policy D2 – Heritage
- Policy CC1 – Climate Change Mitigation
- Policy CC2 – Adapting to Climate Change



- Policy CC3 – Water and Flooding
- Policy CC4 – Air Quality
- Policy CC5 – Waste
- Policy T1 – Prioritising Walking, Cycling and Public Transport
- Policy T2 – Parking and Car Free Development

Emerging Local Plan

- 6.8. The Council has published a new Draft Camden Local Plan (DCLP) for which Regulation 18 consultation was undertaken between January to March 2024. Given the early stages of preparation, the DCLP has very limited weight in decision-making at this stage.

7. Planning Assessment.

7.1. This section of the Statement sets out the justification for the proposed development when considered against the relevant planning policies and other material considerations.

7.2. The key matters for consideration arising from this proposal are as follows:

- Principle of Development
- Affordable Student Accommodation Statement
- Quality and Accessibility
- Impact on Neighbouring Amenity
- Urban Design
- Heritage Impact
- Landscape and Biodiversity
- Basement Considerations
- Energy and Sustainability
- Air Quality
- Water, Flood Risk and Sustainable Drainage
- Transport and Highways
- Employment and Training
- Fire Safety

7.3. These are considered in turn below.

Principle of Development

7.4. Local Plan Policy G1 highlights that the Council will create conditions for growth to deliver homes, jobs, infrastructure and facilities to meet Camden's needs. The policy requires the Council to deliver growth by supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage and transport accessibility. Development will be resisted where it makes inefficient use of land. Growth should help achieve strategic objectives, including additional homes. The most significant growth in the Borough is to be delivered in Growth Areas, as well as at other highly accessible locations including in particular Central London (within which the Site is located).

Replacement Church

7.5. Chapter 8 (Promoting healthy and safe communities) of the NPPF states at paragraph 98 that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities (including places of worship) and other local services to enhance the sustainability of communities and residential environments. London Plan Policy S1 states development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need should be supported.

- 7.6. Local Plan Policy C2 states that the Council will work with its partners to ensure that community facilities are developed and modernised to meet the changing needs of the community. The Council will ensure that facilities provide access to a service on foot and by sustainable modes of travel; will facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community; seek the inclusion of measures which address the needs of community groups and foster community integration; and ensure existing community facilities are retained recognising their benefit to the community.
- 7.7. The church has existed in this location since at least 1825, and has been subject to considerable extension and alteration over the centuries. Consequently, the existing church facility is very outdated and not fit for purpose by modern standards.
- 7.8. The proposal will not only retain the King's Cross Methodist Church, but will significantly enhance it through improved facilities including larger church hall, a new café, provision of secured cycle spaces, meeting/community rooms as well as incorporating disabled access by providing step free access from both Birkenhead Street and Crestfield Street and DDA compliant WCs, and enhanced sustainability and energy efficiency credentials. This will result in a community facility that meets modern standards and provide an enhanced experience for users of the space.
- 7.9. Whilst predominantly a place of worship, the existing church is used not only for services and by church members, but also by various wider local community groups (including vulnerable users) with whom the church have close partnerships, as set out in the Community Use Plan above (see paragraph 5.5 onwards). The church will be extended and designed to modernise and facilitate growth of the church, which includes the provision of greater multi-purpose space and facilities which will be available for use by registered local community users on request, benefitting the wider community and fostering community integration, in accordance with Policy C2. The provision of dedicated cycle parking is also a significant improvement on existing, and will encourage sustainable modes of travel.
- 7.10. On the basis of the above the proposal will entirely accord with Local Plan Policy C2, as well as the NPPF and London Plan Policy S1.

Student Accommodation

- 7.11. London Plan Policy H15 (Purpose Built Student Accommodation) requires Boroughs to ensure that local and strategic need for purpose-built student accommodation (PBSA) is addressed, provided that at neighbourhood level, the development contributes to a mixed and inclusive neighbourhood; and that the accommodation should provide adequate functional living space and layout.
- 7.12. The proposal seeks to replace and provide a relatively modest extension to the existing student accommodation at the site and will continue to contribute to a mixed and inclusive neighbourhood in this respect, which comprises a variety of residential, office and hotel uses. The standard of student accommodation will provide a greatly enhanced quality of accommodation compared to the existing, which is outdated and significantly below modern standards, as discussed in further detail in the Quality of Accommodation section below.
- 7.13. The supporting text to Policy H15 states that there is an overall strategic requirement for 3,500 PBSA bedspaces to be provided annually over the London Plan period. It makes clear

that the housing need of students in London, whether in PBSA or shared conventional housing, is an element of the overall housing need for London.

- 7.14. London Plan Policy H1 (Increasing Housing Supply) sets the ten-year housing target for the London Borough of Camden of 10,380 net completions of homes per annum from 2019/20 – 2028/29. It requires Boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, including small sites (below 0.25ha) and sites with PTAL ratings of 3–6 or located within 800m of a station (which apply to the application site). London Plan Policy H2 (Small Sites) requires Boroughs should pro-actively support well-designed new homes on small sites to significantly increase the contribution of small sites to meet housing needs.
- 7.15. The supporting text to London Plan Policy H1 states that *'Net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home.'* The site as existing provides the equivalent of 10.4 homes¹ in this respect, and will provide the equivalent of 24.2 homes² through the proposal. On this basis, the proposal will contribute the equivalent net increase of 13.8 homes to Camden's housing supply.
- 7.16. As such, the proposal will optimise development of this small brownfield site to provide student accommodation which will contribute towards meeting the identified housing need in accordance with London Plan Policies H1 and H2, and in accordance with the NPPF which seeks to significantly boost the supply of homes, and make effective use of land, giving substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.
- 7.17. Local Plan Policy H9 (Student Housing) states that the Council will seek a supply of student housing to meet or exceed Camden's target of 160 additional places in student housing per year. The Council will support the development of student housing provided that the development:
- (a) will not involve the net loss of 2 or more self-contained homes;*
 - (b) it will not prejudice the Council's ability to meet its target for self-contained homes;*
 - (c) will not involve a site identified for self-contained housing;*
 - (d) complies with any relevant standards for houses in multiple occupation (HMOs);*
 - (e) serves higher education institutions that are accessible from it;*
 - (f) includes a range of flat layouts including flats with shared facilities wherever practical and appropriate;*

¹ 18 single rooms + 8 students occupying 4 twin rooms/2.5 = 10.4

² (12no. single study rooms + 16 students occupying 8no. twin study rooms / 2.5) + 13no. studios= 24.2 homes.



(g) has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole;

(h) will be accessible to public transport, workplaces, shops, services, and community facilities;

(i) contributes to creating a mixed, inclusive and sustainable community; and

(j) does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity.

- 7.18. The policy also states that the Council will resist proposals that involve the net loss of student housing.
- 7.19. Taking each of the policy criteria in turn, the proposal will not result in any net loss of student housing nor of self-contained homes. To the contrary, it seeks to replace, enhance and expand the provision of student accommodation at the site.
- 7.20. In respect of part b, the proposal will not prejudice the Council's ability to meet their target of additional self-contained homes per year. As set out above, the proposal will contribute a net uplift of the equivalent of 13.8 homes to the Borough's targets.
- 7.21. In respect of part c, there are no planning permissions for self-contained housing on the site, nor is the site allocated as such under the adopted or emerging Local Plan.
- 7.22. In respect of part d, the student accommodation has been designed to comply with the relevant standards for student accommodation in accordance with Camden's Student CPG (published after the Local Plan) and is therefore compliant with the relevant standards.
- 7.23. In respect of part e, there are several higher education institutions that are easily accessible from the Site, including those in King's Cross and the neighbouring area in Euston such as UCL, SOAS, Birkbeck as well as others in Central London.
- 7.24. In respect of part f, the proposals include a range of student rooms including study bedrooms as well as private studios, including DDA accessible rooms. Shared facilities will be provided in the form of a large communal living/kitchen/dining area, laundry room and roof terrace.
- 7.25. In respect of part g, please refer to the Affordable Student Accommodation section below.
- 7.26. In respect of part h, the Site has excellent public transport accessibility, being located within the highest PTAL rated area of 6b, in very close proximity to King's Cross and St Pancras Stations. There are numerous shops and services nearby, with the Site located adjacent to the Primary Frontage of Kings Cross Central London Frontage (one of Camden's designated Centres) as well as offices and community facilities (being itself located above the church).
- 7.27. In respect of parts i and j, the proposed student accommodation will continue to contribute to the mixed, inclusive and sustainability community in the same manner as the existing. King's Cross is a dense and diverse urban area to which the students will contribute. It is acknowledged that King's Cross ward is home to a reasonably sized student population, largely due to its excellent connections and proximity to numerous higher education institutions. However student accommodation is not being introduced in this location as a

new use; instead student accommodation has existed and been in continuous use at the site for in excess of 40 years. The proposal simply seeks a very modest uplift of only 11 rooms. When viewed in this context, it is clear that the proposal will not result in a harmful concentration of student accommodation use in the local area. Furthermore, the accommodation will be operated by the Church with a Christian ethos and students will be required to agree to subscribe to the principles and practice of the church, complying with 'House Rules' which will govern communal living, including quiet hours, guest policies, and participation in house duties, dinners and meetings to foster a sense of community and ensure students are aware of their obligation to behave responsibly with respect for fellow students, neighbours, staff and property. A Student Housing Management Plan is submitted which provides further detail and includes wider measures to manage the accommodation and ensure no harm to residential amenity. Securing compliance with the Student Housing Management Plan through this current application will be a notable benefit, given management of the existing student accommodation is not secured through planning condition or obligation.

- 7.28. On the basis of the above, the proposals will comply with London Plan Policy H15 and Local Plan Policy H9 and the principle of student accommodation is therefore acceptable in this location. Officers confirmed this view during pre-application discussions.
- 7.29. The proposal will also increase the supply of new student homes within the Borough consistent with strategic policy objectives. The provision of new student homes will contribute to meeting Camden's housing targets as set out within the London Plan Policies H1 and H2 and is supported by paragraph 73 of the NPPF which highlights the importance of small and medium sites in meeting the housing requirement. The proposals will also make effective and efficient use of the existing brownfield site in accordance with the principles of the NPPF, the London Plan and Local Plan Policy G1.

Summary

- 7.30. Overall, the proposed development will modernise and provide significantly enhanced facilities to the existing church and student accommodation which are currently very outdated.
- 7.31. There are no changes proposed to the land use, however the proposal will extend both the church and student accommodation elements, making effective use of this small brownfield site in a highly sustainable location, optimising its development potential with due regard to its site-specific constraints.
- 7.32. The re-provision and enhancement of the existing church as a community facility is supported at national, regional and local level. The existing student accommodation is well established, having been operated by the Church for in excess of 40 years, and contributes to the mixed, inclusive and sustainable community in the area. However the quality of accommodation falls well below modern policy requirements. Re-provision of the student accommodation to an upgraded standard and the modest uplift of 11 student rooms is acceptable in principle and will not result in an over concentration of uses in this area nor harm surrounding amenity. Notwithstanding this, a Student Housing Management Plan is proposed, which can be secured through condition. This will be a notable benefit, given management of the existing student accommodation is not secured through planning condition or obligation. On the basis of the above, the principle of development will entirely

accord with London Plan Policies S1, H1 and H2, Local Plan Policies G1, C2, H9 and H15 and the NPPF.

Affordable Student Accommodation

- 7.33. The proposed student accommodation is relatively small scale, seeking to largely replace the existing accommodation, with only a modest uplift. The church will operate the accommodation in the same manner as existing, seeking to provide a Christian community ethos, with the student accommodation serving to strengthen the faith community and the community services the church offers.
- 7.34. London Plan Policy H15 seeks to ensure the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan; seeking at least 35% of the student accommodation as affordable to be eligible for the fast-track route.
- 7.35. The London Plan defines affordable student accommodation as *“a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government’s maintenance loan for living costs for that academic year.”*
- 7.36. The proposal seeks to replace the existing 22no. student rooms, and provide an additional 11no. rooms to provide 33 student rooms in total.
- 7.37. The scheme will therefore provide 4no. student rooms as affordable student accommodation. This will deliver 36.4% of the 11no. additional new student rooms as affordable (by both number of rooms and habitable rooms). As such the 35% threshold has been met and the proposal qualifies as a fast track scheme.
- 7.38. The affordable provision will be interspersed with the other flats and all will have the same access to all the shared facilities as the rest of the student rooms.

Quality and Accessibility

- 7.39. London Plan Policy H15 states that boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed provided that at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood and the accommodation provides adequate functional living space and layout.
- 7.40. Local Plan Policy H9 states that the Council will support student housing developments provided that it complies with any relevant standards for houses in multiple occupations (HMOs), includes a range of flat layouts including flats with shared facilities wherever practical and appropriate, contributes to creating a mixed, inclusive and sustainable community.

Quality of Student Accommodation

- 7.41. London Plan Policy H15 requires PBSA to provide adequate functional living space and layouts. The Student Housing CPG requires student housing developments include a range of flat layouts including cluster flats, be designed to meet relevant standards and provide safe,

secure, functional, adaptable and accessible spaces and support the health and wellbeing of students including the provision of community facilities.

- 7.42. The proposed student accommodation will comprise a range of flat layouts including a mix of 20no. study bedrooms with ensuites and 13no. private studios. 2no. accessible rooms are provided (one study room and one studio).
- 7.43. The student accommodation is accessed via Crestfield Street. Communal facilities are provided on the upper levels in proximity to the student rooms, with a large communal living/kitchen/dining room at third floor level and laundry room at first floor level. There is a dedicated long-stay cycle store at basement level.
- 7.44. Upper floors contain groups of bedrooms along corridors, predominantly made up of cluster rooms (containing ensuite bathrooms, study and sleeping spaces) and studios (containing a kitchenette as well as ensuite, study and sleeping space). All will have use of the shared communal kitchen.
- 7.45. The student rooms are served by 1 or 2, and occasionally 3 windows. There is no policy requirement for student accommodation to be dual aspect, and this is challenging to achieve in a dense urban environment where room sizes are relatively small compared to C3 dwellings, and given the retrofit nature of the scheme, which seeks to retain the majority of the original building in light of its positive contribution to the conservation area. Notwithstanding this, the scheme has been able to deliver 5no. rooms as dual aspect and the shared living/kitchen/dining room will also be dual aspect.
- 7.46. Rooms with windows facing inwards over the central roof terrace are dual aspect, and these windows can be obscure glazed to ensure privacy to the occupants. Similarly, windows of the 2no. flats adjacent to 5 Crestfield Street that face the lightwell gardens are also dual aspect, and can be similarly obscure glazed to prevent overlooking and protect the privacy of the student rooms with south facing windows over the gardens.
- 7.47. Following feedback from pre-application engagement with Officers, all study rooms and studios have been designed to comply with the benchmark space standards set out in Camden's Planning Guidance on Student Housing. This requires study bedrooms with shower, W/C and wash basin (without kitchen facilities) to provide 10.6sqm of floorspace for single rooms and 13.7sqm of floorspace for twin rooms; and studio rooms to provide 15.5sqm and 17.5sqm for twin studio rooms. All of the student rooms provided comfortably exceed these benchmark standards, providing a high quality of accommodation for future occupants. This is a significant improvement on the existing sub-standard accommodation; whereby over half of the 22 rooms currently provide only 7sqm or less of floorspace per room – well below the benchmark standards.
- 7.48. There is no policy requirement for private amenity space, however the scheme has been designed to provide students with access to a communal terrace on the main roof of the third floor incorporating soft landscaping, as well as a smaller terrace fronting Crestfield Street from the living/kitchen/dining area. Three study rooms on third floor level will also have access to their own terrace space fronting Birkenhead Street.
- 7.49. Overall, the proposed accommodation will provide enhanced facilities which meet modern standards and policy requirements in accordance with Local Plan Policy H9 and CPG Housing for Students.

Daylight and Sunlight

- 7.50. Local Plan Policy A1 seeks to ensure the amenity of occupiers is protected, including in respect of daylight and sunlight.
- 7.51. The Internal Daylight and Sunlight Assessment, prepared by DRP, sets out that of the total 24 rooms (including the living/kitchen/dining room), in respect of daylight matters, 16 rooms (47%) would meet the BRE guidelines of 150 lux for studios or living areas and 24 (71%) will satisfy the alternative target values of 100 lux for bedrooms. In respect of sunlight, 12 rooms (35%) will satisfy the BRE guidelines.
- 7.52. It should be noted that the site is located within a dense urban area within Central London, whereas the BRE guidelines are predicated on more suburban type environments and should therefore be interpreted flexibly. Whilst the starting point for student accommodation should be to achieve the best possible standards, it must be recognised that the highly transient nature of student accommodation is markedly different from the typical long-term permanent use to which the BRE guidance relates. In practice, students will occupy their rooms for a relatively short period of time, and typically only during term time.
- 7.53. Of note, the existing student rooms are significantly below the Student Housing CPG space benchmarks, with over 50% of rooms providing only a very small 6–7sqm of floorspace (well below the minimum 10.6sqm required). To ensure a high standard of accommodation in the proposed development, the student rooms have been designed to exceed the space benchmarks. Though living conditions will be significantly improved compared to the existing by reason of the comfortably sized rooms, the larger size of the rooms has resulted in a bearing on the daylight results. Consequently in order to address this, the study spaces to all rooms have been situated by the windows where daylight is best, with the beds situated further towards the rear. The proposed room layouts in this respect, coupled with CPG compliant room sizes, will provide a good standard of accommodation.
- 7.54. Furthermore, all students will have access to the large communal living/kitchen/dining room which comfortably exceeds daylight and sunlight targets.
- 7.55. It should also be noted that the design of the scheme has had regard to its site-specific constraints. The proposal follows the previous refusal for complete demolition and redevelopment, as well as subsequent pre-application engagement with Officers, and thus now focuses on the majority retention and retrofit of the existing building, in particular its original parts to the east and central parts of the site, given these parts of the building are considered to contribute positively to the wider conservation area. This focus on retention on heritage grounds has included retaining and utilising the existing window openings on the first and second floors, which has had a bearing on the daylight results.
- 7.56. In summary, the BRE guidelines must be applied flexibly, particularly given the highly urbanised context and heritage constraints of the site. The scheme has had due regard to its siting and positive contribution to the conservation area, with predominant focus on retrofit of the historic parts of the building and retention of the existing window openings which has had bearing on the daylight results – particularly when coupled with the increase in student room sizes compared to the existing. Notwithstanding this, the proposal is considered acceptable when considering the enhancements in the proposed standard of student accommodation in respect of room sizes compared to the existing sub-standard accommodation, coupled with the proposed room layouts focusing study areas closest to the window where daylight is best, and the provision of a very large BRE compliant shared

living/kitchen/dining room for use by all students. Furthermore it must be recognised that the highly transient nature of student accommodation is markedly different from the typical long-term permanent use to which the BRE guidance relates. When viewed in context of the above, the proposed daylight and sunlight achieved is considered acceptable and will comply with Local Plan Policy A1 and the Amenity CPG.

Accessibility

- 7.57. London Plan Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design. Local Plan Policy C6 seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all; and expect spaces, routes and facilities between buildings to be designed to be fully accessible.
- 7.58. The Student Housing CPG sets out the requirement for at least 5% of new bedrooms to be wheelchair accessible. Two of the proposed student rooms will be wheelchair accessible, exceeding this 5% requirement.
- 7.59. In respect of the church, at present disabled access is severely restricted by the steps to the original entrance on Birkenhead Street. The secondary accesses on Crestfield Street are also not level to the pavement and require negotiation of a step. The proposal will significantly enhance access, providing a platform lift to the Birkenhead Street entrance; and incorporating level access to Crestfield Street, as well as introducing an internal lift to allow access for all to all levels of the building. This will entirely accord with Local Plan Policy C6 and London Plan Policy D5 which seek accessible and inclusive design.
- 7.60. Further information can be found within the Accessibility Statement and Access Strategy section of the Design and Access Statement.

Noise

- 7.61. A Noise Impact Assessment for the Proposed Student Accommodation, prepared by ACA, has been submitted in support of this application.
- 7.62. The submitted Noise Impact Assessment, prepared by ACA Acoustics, considers the impact of existing noise levels affecting the proposed student accommodation. In terms of external noise, the report notes that whilst Birkenhead Street and Crestfield Street are reasonably shielded from traffic from the station, there is consistent background noise arising from traffic associated with the A501 and King's Cross Railway Station.
- 7.63. Consequently, the report recommends acoustic trickle vents to habitable student rooms; and recommends specifications of construction materials including glazing, doors, roof and façade walls to ensure sufficient noise insulation. Of note, the report recommends an overheating strategy to ensure occupants do not need to open windows during the night due to background noise levels during this time. The Energy Strategy recommends mechanical ventilation and active cooling which would address this.

- 7.64. The proposed scheme will incorporate the recommended measures, which will ensure a good standard of accommodation for the students against external noise sources. The measures can be secured through suitably worded planning condition.
- 7.65. The Noise Impact Assessment concludes that, subject to inclusion of the recommended mitigation measures, there will be no adverse impact on amenity in accordance with London Plan Policies D13 and D14, which seek to manage noise through appropriate mitigation measures and the Local Plan Policies A1 and A4 which also seeks to ensure that noise levels are controlled and managed.

Impact on Neighbouring Amenity

- 7.66. London Plan Policy D14 sets out a number of ways to reduce, manage and mitigate noise to improve health and quality of life. Development proposals should manage noise by mitigating and minimising the existing and potential adverse impacts of noise on and from new development without placing unreasonable restrictions on existing noise-generating uses and reflecting the Agent of Change principle as set out in Policy D13 Agent of Change.
- 7.67. Local Plan Policy A1 states that the *"Council will seek to protect the quality of life of occupiers and neighbours."* Of relevance, the factors which will be considered includes visual privacy and outlook; daylight, sunlight and overshadowing and noise and vibration levels. The Amenity CPG also provides additional guidance. Local Plan Policy A4 states that the Council will seek to ensure that noise and vibration in controlled and managed.

Daylight, Sunlight and Aspect

- 7.68. The submitted Daylight and Sunlight Effects Assessment, prepared by DRP, analyses the impact of the proposed development on the neighbouring residential properties. Detailed tests including the vertical sky component (VSC) and no-sky line (NSL) were undertaken.
- 7.69. In total 194 windows serving 151 rooms in 16 buildings were assessed in respect of daylight and 113 rooms in 12 buildings were assessed in respect of sunlight. In terms of the effects on the daylight and sunlight to neighbouring properties due to the proposed development, the impact on daylight will meet BRE guidelines for all 194 windows (100%) for VSC and all 151 rooms (100%) for NSL. The impact on sunlight will also fully meet the BRE guidelines (annual and winter sunlight) to all 113 rooms (100%).
- 7.70. To conclude, the Daylight and Sunlight Assessment demonstrates that the proposed development will wholly adhere to the BRE guidelines. As such the proposed development will not result in any adverse impact on surrounding amenity in respect of daylight and sunlight to the occupiers of the surrounding buildings and the proposal therefore accords with Local Plan Policy A5 and the Amenity CPG.
- 7.71. It should be noted that the Assessment included consideration of the impact of the proposed development on Nos. 1 and 5 Crestfield Street. One of the reasons for refusal of the previous application ref. 2015/7013/P was due to the omission of these properties from the submitted daylight and sunlight assessment at the time.

Privacy

- 7.72. Local Plan Policy A4 also seeks to protect amenity in respect of visual privacy and outlook.

- 7.73. Whilst the proposal seeks an additional floor of student accommodation, this will maintain the same setback from neighbouring properties as the existing student accommodation and thus not result in any greater extent of overlooking. On the opposite side of Crestfield Street construction is underway on the Belgrove House redevelopment, incorporating commercial office and research and laboratory floorspace; with café, flexible retail and office floorspace at ground floor. As such there will be no adverse impact on amenity arising from overlooking.
- 7.74. To the north of the building, the existing warden's accommodation window at first floor level will be replaced with a window serving the community room space; which will only be in use for limited periods compared to the existing habitable accommodation, resulting in lesser overlooking of neighbouring properties than at present. On the opposing side, the window will serve ancillary circulation space in the same manner as existing – which is replicated at second floor level. There are no new windows proposed at third floor level facing the north of the site in order to protect neighbours' amenity.
- 7.75. To the south of the building, the two existing warden's accommodation windows at first floor level will be replaced with a single smaller window serving a student room. This will not result in any greater overlooking of neighbours' properties than at present. This is replicated at second floor level, however retains the same setback from the neighbouring properties as below, again not resulting in any undue harm. Particularly given a degree of overlooking is expected in densely populated areas such as this. The opposing side will continue to incorporate ancillary circulation space.
- 7.76. The proposal will create a new central roof terrace at second floor level. Views to neighbouring properties will be minimised through use of planters to the northern and southern sides which will provide screening. The planters will also setback the accessible areas of the terrace away from the parapet walls, which will further minimise overlooking. The plant enclosure to the north itself will obscure views.
- 7.77. Where the proposed development abuts the neighbouring boundaries, this will either align with the rear projection of the neighbouring dwellings, or be set no further to the rear than the existing building line of the church. As such, this will ensure no undue sense of enclosure or loss of outlook.
- 7.78. In summary, there will be no harmful impact on privacy of neighbouring occupiers, nor undue sense of enclosure or loss of outlook arising from the proposal and the proposal will accord with Local Plan Policy A4.

Noise

- 7.79. As part of the proposal, a plant enclosure is proposed on the main roof at second floor level. Further plant equipment is also proposed to the pitched roof fronting Crestfield Street, screened from view behind the parapet. A Noise Impact Assessment of Proposed New Mechanical Services Equipment, prepared by ACA, has been submitted in support of this application. This provides assessment of the proposed new mechanical services equipment to be installed as part of the development on surrounding amenity.
- 7.80. Acoustic mitigation measures are proposed which includes duct-mounted attenuators to the AHUs and a transhield-transmat installed around one of the AHUs; acoustic enclosure and louvres to the condensers; and mounting on vibration isolators.

- 7.81. The Noise Impact Assessment concludes that, subject to inclusion of the recommended mitigation measures, there will be no adverse impact on surrounding amenity in accordance with Local Plan Policy A4. The measures can be secured through suitably worded planning condition.
- 7.82. Of note, the proposed church and student accommodation replace the same existing uses on the site and as such the proposal is not expected to result in any adverse noise impact, particularly given the relatively high background noise levels in the vicinity arising from the Site's proximity to King's Cross Railway Station and the busy A501 to the north of the site. Notwithstanding this, it should be noted that the student accommodation will be managed in accordance with a Student Housing Management Plan, which will be an improvement on the existing situation, whereby there is no planning restriction controlling the management of the student accommodation.

Urban Design

- 7.83. London Plan Policy D3 seeks to optimise site capacity through a design-led approach. This policy sets out that development proposals 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"*. In addition, they should achieve safe, secure and inclusive environments and consider the experience, as well as quality and character to respond to the existing character of a place. London Plan Policy D4 requires Design and Access Statements to demonstrate that the proposals meet the design requirements of the London Plan.
- 7.84. Local Plan Policy D1 sets out the criteria which the Council will use to secure high quality design in developments. Of relevance, the Council will require that development respects local context and character; preserves or enhances the historic environment and heritage assets; is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation; is of sustainable and durable construction and adaptable to different activities and land uses; comprises details and materials that are of high quality and complement the local character; integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; is inclusive and accessible for all; promotes health; is secure and designed to minimise crime and antisocial behaviour; incorporates high quality landscape design and maximises opportunities for greening; incorporates outdoor amenity space; for housing, provides a high standard of accommodation; and carefully integrates building services equipment. The Council expects excellence in architecture and design. Camden's Design CPG is also of relevance.

Scale, Massing and Form

- 7.85. The proposed development has been carefully designed to respect and conserve the local context, with design that has due regard to the site's historic context in accordance with London Plan Policies D3 and D4, and Local Plan Policy D1 and the Design CPG.
- 7.86. The design of the proposed development has had due regard to the previously refused scheme in 2019 (ref. 2015/7013/P) for a 5 storey development which was refused in part on grounds that its design, layout, height, scale, bulk and form on both frontages of Birkenhead

Street and Crestfield Street, would harm the character and appearance of both King's Cross St Pancras and Bloomsbury Conservation Areas and the setting of surrounding listed buildings.

- 7.87. The proposal has been significantly reduced in scale and massing since this time, and the design altered following extensive pre-application engagement with Camden Design and Conservation Officers.
- 7.88. The proposed development will extend up to 4 storeys in height (plus basement), an additional storey greater than the existing. The 4 storey height which will respect the height of the adjacent buildings on Crestfield Street and Birkenhead Street which extend up to 3 storeys plus mansard roofs. Whilst the building will extend up to 4 storeys fronting either street, the central part of the building will only extend to 3 storeys ensuring the massing and form respects that of the surrounding context and to avoid any undue sense of enclosure. The height of the proposed development will be largely aligned with that of the adjacent buildings where it adjoins them, however will extend up into a stepped gable roof form on both Birkenhead and Crestfield Street. Whilst the overall height will be greater than the immediately adjacent buildings, the stepped gable form will ease the transition in its rise whilst creating a confident and distinct skyline, strengthening its resemblance to a church building with a modern re-interpretation of the original church pediment that signifies its church use, as shown below.



Figure 5: Proposed Birkenhead Street Elevation



Figure 6: Proposed Crestfield Street Elevation

- 7.89. Furthermore, it should be noted that the maximum height will remain lower than the King's Cross Inn Hotel at the northern end of both streets and the Belgrove House redevelopment currently under construction immediately opposite the site on Crestfield Street will extend up to 10 storeys. As such, the proposed scale and massing will be entirely in accordance with

both the existing and emerging context, with due regard paid in the design to the historic significance of the church building within the conservation area.

- 7.90. Further detail can be found in the submitted Design and Access Statement, prepared by Matthew Lloyd Architects.

Townscape Impact

- 7.91. A Townscape and Heritage Statement, prepared by Revive and Tailor, is submitted in support of this application. In regard to the townscape impact of the proposal, it notes that the proposed development takes cues from the established rhythm and proportions and continues them in a contemporary interpretation, while also recognising that there is room for individual architectural expression within this varied townscape. In doing so, it will create a distinctive yet contextual building that adds a new twenty-first century layer to the character of the area. The proposal also takes advantage of the opportunity to consider the Birkenhead Street and Crestfield Street frontages together, unifying the building on both elevations, creating a new identity within the street, and re-establishing its original prominence as a building of worship.
- 7.92. The proposed layout and form responds to the existing street pattern and maintains the original plot layout, though maximising it to provide additional space. The scale continues the established character of the residential terraces, as well as responds to the emerging townscape context of King's Cross as a major transport hub that is characterised by high density and medium-high rise blocks characterising the extensive regeneration in the locality. The roof extension, will stand in contrast to the existing and refreshed elevation with darker brick colouring and modernist adaptations of the fenestration.
- 7.93. The assessment of views show the building would be largely invisible from key junctions within the townscape. Along Birkenhead Street, the roof extension carefully distinguishes the contemporary addition with the historic facade. The fenestration pattern reinstates some of the lost features whilst appearing harmonious with the residential terraces. This allows the street level frontage to appear unified with the wider street frontage, whilst still appearing distinctive as a non-domestic building. New active frontage to Crestfield Street will contribute to the streetscene and vitality of the area.
- 7.94. In respect of townscape impact, the report concludes that the proposal will positively contribute to the townscape of the area in terms of height, massing, proportions, fenestration, materiality and street frontage. It will enhance the area's townscape setting with a contextual and high quality new development that sits harmoniously within its sensitive as well as emerging context, and have a positive visual effect through the quality of its design, materials and through increased activity.

Materials, Reuse and Adaptation

- 7.95. In terms of materials, the Design and Access Statement highlights that the palette used on the Birkenhead Street façade will be closely related to the existing, while detailed in a more contemporary expression, comprising brickwork and brick corbelling roof parapet. The Crestfield Street façade will use materials closely related to the Birkenhead Street third floor extension, however will incorporate liberal fenestrations and longer spanning pre-cast elements to form a contemporary disposition. The proposed development incorporates various soft landscaping at roof level and to the lightwell gardens to the north and south,

which will introduce urban greening where there currently is none, and will soften the appearance of the building from private views.

- 7.96. Of note, the previously refused scheme sought to demolish the entire existing building and was refused in part on grounds that the part of the building on Birkenhead Street would result in the loss of a building which makes a positive contribution to the King's Cross St Pancras Conservation Area.
- 7.97. As such, the proposal seeks to instead retain this original part of the building and in particular the Birkenhead Street facade. Only the newer 1950s addition fronting Crestfield Street, known as Mission House, will be demolished and redeveloped. The majority of the existing building to be retained will instead be reconfigured and retrofitted, with sensitive energy efficiency enhancements made. This will not only preserve the positive contribution it makes to the conservation area, but also reuse of the existing building accords with the wider sustainability principles of Local Plan Policy CC1 (Climate Change Mitigation).
- 7.98. As a result of this approach, the majority of the existing external facing brickwork will be retained. All windows and the full roof will be replaced for better thermal performance. Internally, the existing reinforced concrete staircases will be retained and re-used. The use of brick on the frontage allows the street frontage of the building to appear unified with the wider area, whilst still harmonising with the overall architectural language of the proposal.

Security and Safety

- 7.99. Local Plan Policy C5 requires developments to demonstrate that they have incorporates design principles which contribute to community safety and security. The Applicant has met with the Metropolitan Police's Designing Out Crime Officer and a Crime Impact Assessment is included within the Design and Access Statement. This sets out proposed security measures considered, including secure and comprehensive access control system, long-stay cycle stores to be kept separate for each user group and adequate CCTV and lighting.

Summary

- 7.100. In summary the proposed development is considered to comply with paragraph 131 of the NPPF which highlights the importance of good design and the London Plan Policies D1 and D3 and the Local Plan Policy D1 which requires proposals to ensure that the scale, height, mass, bulk, materials to be appropriate to the site and responds positively to its surrounding context and consists of a high quality development overall.

Heritage Impact

- 7.101. Chapter 16 (Conserving and enhancing the historic environment) of the NPPF seeks to conserve heritage assets.
- 7.102. London Plan Policy HC1 states that *"Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process."*

- 7.103. Local Plan Policy D2 reiterates the NPPF and the London Plan Policy HC1. The Local Plan Policy D2 seeks to preserve, and, where appropriate enhance Camden's heritage assets and their settings. The policy states that *"The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss..."*
- 7.104. With specific regard to Conservation Areas, the policy states *"In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:*
- *require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
 - *resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
 - *resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
 - *preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage."*
- 7.105. The policy also seeks to resist development that would cause harm to significance of a listed building through an effect on its setting.
- 7.106. The Site is located within the King's Cross Conservation Area, with a number of Grade II listed buildings in the immediate surroundings along Birkenhead Street and Crestfield Street. The design has evolved through pre-application engagement with Camden's Design and Heritage Officers as set out above. The submitted Townscape and Heritage Statement, prepared by Revive and Tailor, concludes that in heritage terms, the proposals will not harm the conservation area nor the surrounding listed buildings.
- 7.107. To the contrary, the proposal will result in a number of enhancements to the setting of the heritage assets as well as to the building's own local interest. The works will ensure that the key elements of significance such as the historic use of the building, the altered front (Birkenhead Street) elevation, and parts of the structure are retained and enhanced.
- 7.108. The proposed retention of the Birkenhead Street elevation would keep the oldest originally built part of the building, acknowledging it has been altered over time. However the double storey fenestration of the first and second floors will reinstate a key feature that was lost in 20th century additions, and the refreshed elevation will incorporate the date stone of "1825". The proposed Crestfield Street elevation will create a playful expression of solid and void with rhythmic 'punctures' within the facade. The proposal is united with the elevation on Birkenhead Street with the same stepped fenestration on the third floor, corresponding with the stepped gable feature. This design move in particular, for the first time, unites the building on both street elevations as one unit, creating a new and stronger identity for the Church. The overall architectural approach with muted tones to materiality creates a subtle but confident street frontage on both streets, enhancing the setting of the listed buildings and the conservation areas.

- 7.109. The building, with the new extensions, will also cater to the need of the community and enhance the understanding of its history, resulting in significant heritage benefit. The proposed changes take the opportunity arising from the investment proposed in it, to make these much needed changes and therefore, securing its long term viable use consistent with its conservation. As such, the report concludes that the proposal accords with the relevant policies in the NPPF, London Plan Policy HC1 and Camden Local Plan Policy D2.

Landscape and Biodiversity

- 7.110. London Plan Policy G5 states that major development proposals should contribute to the greening of London by incorporating measures such as high-quality landscaping. Local Plan Policy A3 states that the Council "*will expect developments to incorporate additional trees and vegetation wherever possible.*"
- 7.111. There is no existing landscaping or greening on the Site; which incorporates only hardstanding at ground level. However, the proposed development will provide urban greening through the incorporation of planting on the ground floor lightwell gardens and on the communal roof terrace. The introduction of landscaping and urban greening will be a notable enhancement when compared to the existing situation and deliver associated biodiversity benefits whereas currently there are none. Landscaping to the roof terrace will extend along both the northern and southern edges, which will be visible in some private views; as well as greening around the plant enclosure and seating areas for enjoyment of students.

Basement Considerations

- 7.112. Local Plan Policy A5 states that basement development will be permitted where it can be demonstrated to the Council's satisfaction that the proposal will not cause harm to:
- a) *neighbouring properties;*
 - b) *the structural, ground, or water conditions of the area;*
 - c) *the character and amenity of the area;*
 - d) *the architectural character of the building; and*
 - e) *the significance of heritage assets.*
- 7.113. The policy goes on to say that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. It sets out further criteria that basement development should achieve, including:
- l) *be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and*
 - m) *avoid the loss of garden space or trees of townscape or amenity value.*
- 7.114. The policy states that exceptions to f to k apply for large comprehensively planned sites, which are defined as including new major developments. The proposal comprises a major development and therefore criteria f to k do not apply and have not been rehearsed here.

7.115. The policy goes onto state that the Council will require applicants to demonstrate that proposals for basements:

n) do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';

o) avoid adversely affecting drainage and run-off or causing other damage to the water environment;

p) avoid cumulative impacts;

q) do not harm the amenity of neighbours;

r) provide satisfactory landscaping, including adequate soil depth;

s) do not harm the appearance or setting of the property or the established character of the surrounding area;

t) protect important archaeological remains; and

u) do not prejudice the ability of the garden to support trees where they are part of the character of the area."

7.116. The application is supported with a Basement Impact Assessment (BIA) in accordance with Local Plan Policy A5. The report provides an assessment of the ground and water conditions, ground movements as a result of the proposed excavation to extend the existing basement (referred to on the architectural plans as Lower Ground Floor), the extent of contamination and to provide information to assist in the design of the basement structure and suitable foundations.

7.117. The BIA concludes that there are no concerns with regards to the effects of the proposed basement extension on the site and surrounding area, and that the impacts identified can be mitigated by appropriate design and standard construction practice. This will ensure no harm to neighbouring properties (including listed buildings), nor structural, ground and water conditions. As such the report demonstrates that the proposal will comply with criteria a, b and e.

7.118. The proposals seek to extend the existing basement, providing a total basement gross internal area of 624sqm to maximise space on the lower ground floor to accommodate improved community facilities such as meeting/community rooms, kitchen and WCs for the Church as well as a secure cycle store. The extended basement will provide additional space, without further increasing bulk and massing above ground level beyond what is currently proposed; which has had due regard to the impact of the design on the designated heritage assets. Furthermore, the site already features a basement as do the neighbouring properties. In this respect, the proposed basement will ensure there is no harm to the character and amenity of the area, architectural character of the building or significance of heritage assets, in accordance with criteria c – e. The basement will be discreetly contained underneath the building, which will also ensure it does not harm the appearance or setting of the property or established character of the surrounding area in accordance with criterion s.

- 7.119. In regards to criterion l, the Basement CPG specifically states that *“Providing a setback to neighbouring properties will generally not be required where built form or a basement on the neighbouring property extends up to the property boundary.”* As shown on Section 2.3 of the BIA, the proposed basement will adjoins those of the neighbouring properties to the north and south. Therefore whilst the proposals extends beyond the footprint of the existing building, in accordance with the Camden Basement SPG, the setback is not required. It will utilise the existing space below the ground level, making efficient use of land.
- 7.120. In regards to criterion m, there is no existing garden space that could be lost or trees within the site. In respect of criterion n, the BIA concludes that the risk of damage to neighbouring structures does not exceed the specified ‘very slight’ limit regarded as acceptable by the London Borough of Camden. In respect of criterion o, the BIA notes that the site is unsuitable for a soakaway or other similar SUDS system. As such the basement extension will not adversely affect drainage and run-off.
- 7.121. The BIA has taken into account all nearby basements in its assessment, ensuring no cumulative impacts in accordance with criterion p. A Construction Management Plan has also been submitted which sets out management measures to be complied with during the construction and excavation phase to minimise amenity impact on neighbours, in accordance with criterion q. The proposal will transform the existing hardstanding covered lightwell yards into garden spaces. These have been designed to accommodate blue roofs to maximise SUDS within the limited space available, with satisfactory depth for planting to be contained within them in accordance with criterion r. The proposal will not prejudice the delivery of trees in accordance with criterion u as there is not sufficient space to plant any given the size of the light well areas. The site is not located within an Archaeological Priority Area therefore is not expected to impact archaeological remains in accordance with criterion t.
- 7.122. In summary, the proposal seeks to extend the existing basement and fully accords with the Local Plan Policy A5 and the Basements CPG.

Energy and Sustainability

- 7.123. London Plan Policy GG6 states that to help London become a more efficient and resilient city, those involved in planning and development must *“ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.”*

Energy and Carbon Reduction

- 7.124. London Plan Policy SI2 states that major development should be net zero-carbon, reducing greenhouse gas emissions in accordance with the energy hierarchy, which is as follows.
1. be lean: use less energy and manage demand during operation
 2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site

4. be seen: monitor, verify and report on energy performance.

7.125. The policy requires a minimum on-site reduction of at least 35% beyond Building Regulations for major development. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided either off-site or through a cash in lieu contribution to the borough's carbon offset fund.

7.126. London Plan Policy SI5 states that proposals should incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.

- a) *"promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;*
- b) *require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;*
- c) *ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;*
- d) *support and encourage sensitive energy efficiency improvements to existing buildings;*
- e) *require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and*
- f) *expect all developments to optimise resource efficiency."*

7.127. Local Plan Policy CC1 seeks to minimise the effects of climate change and states that the Council will promote zero carbon development, requiring development to reduce emissions through following steps in the energy hierarchy. It requires all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met.

7.128. Local Plan Policy CC2 requires proposals to be resilient to climate change. Developments of 5 or more residential units or 500sqm or more of any additional floorspace is required to demonstrate the measures below in a Sustainability Statement:

- a) *"the protection of existing green spaces and promoting new appropriate green infrastructure;*
- b) *not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;*
- c) *incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and*
- d) *measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy."*

7.129. The policy also highlights that the Council will promote and measure sustainable design construction by encouraging conversions and extensions of 500sqm of residential floorspace or above 5 or more dwellings to achieve "excellent" in BREEAM domestic

refurbishment. Similarly, expecting non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.

- 7.130. The Energy Statement, prepared by Harley Haddow, sets out the approach to energy efficiency and carbon emission reduction for the proposed development. The report highlights that the proposed development has been developed in line with the energy hierarchy as per the London Plan Policy S12.
- 7.131. The report demonstrates that **the proposed development will reduce on-site carbon emissions by 43% over the baseline Building Regulations 2021, comfortably in excess of the London Plan policy requirement of 35%.**
- 7.132. This will be achieved through a combination of passive and active design and energy efficiency measures as well as low carbon technologies in accordance with the energy hierarchy, including enhanced building fabric, use of Mechanical Ventilation with Heat Recovery (MVHR) system, ASHPs, PV panels and LED lighting.
- 7.133. A carbon offset payment of **£19,360** will be made to offset residual carbon emissions to ensure the development is net-zero carbon.

Be Lean Stage (Reduce Energy Demand)

- 7.134. London Plan Policy S12 sets a policy target of at least 15% (non-residential) reduction through reduced energy demand at the first stage of the energy hierarchy.
- 7.135. The Energy Statement confirms that the proposed development achieves a 35% improvement in energy efficiency measures from the Baseline to Lean scenario, well in excess of the 15% requirement.

Be Clean Stage (Decentralised Energy Supply)

- 7.136. Local Plan Policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- 7.137. The Energy Statement considers connection to a district heat network, however concludes that it is not feasible in this instance to connect to one. Therefore, the proposal has been designed using a 100% electric heat pump solution.

Be Green Stage (Low and Zero Carbon Technologies)

- 7.138. The supporting text to Local Plan Policy CC1 indicates an expectation of a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy) from developments of greater than 500sqm, unless it can be demonstrated that such provision is not feasible.
- 7.139. The proposal will achieve an 8% reduction in carbon emissions by these renewable energy technologies. The Energy Statement outlines that a number of low and zero carbon technologies were considered, however several were concluded to be not feasible. However PV panels to the roof and ASHPs have been incorporated within the development, with

maximising of the available roof space for PV panels, to enhance the reduction in carbon emissions through the technologies which are feasible.

- 7.140. In summary, the scheme provides significant site wide savings beyond the Building Regulations in accordance with the overarching aims of the London Plan and Local Plan policies.

Climate Change Adaptation and Sustainable Design

- 7.141. Local Plan Policy CC2 requires all developments to adopt appropriate climate change adaptation measures, including promoting new appropriate green infrastructure; not increasing and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems; and incorporating measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.
- 7.142. The Sustainability Statement, prepared by Harley Haddow, demonstrates that the proposed development will incorporate a range of sustainable design and construction methods. Rather than demolition of the entire existing building as proposed in the previously refused scheme ref. 2015/7013/P, only the western wing of the existing building will be redeveloped, with the large majority of the existing building retained, reconfigured and extended, which will notably minimise waste generated from demolition works. Furthermore, materials for construction will be responsibly sourced. The building is designed to be all-electric using ASHP therefore there will be no direct emissions for space and water heating. SUDS will be incorporated into the development through use of biodiverse green and blue roofs.
- 7.143. Policy CC2 expects non-residential development (which in this context includes student accommodation as well as the church) to meet BREEAM 'Excellent'. The BREEAM Pre-Assessment (included within Appendix A of the Sustainability Statement), prepared by Harley Haddow, confirms that **the proposed development will achieve BREEAM 'Excellent'** with a targeted score of 72.36%.
- 7.144. The Energy Efficiency and Adaptation CPG also sets out sub-targets for 60% of all available energy and water credits and 40% of all available material credits to be met, which the Sustainability Statement confirms have been met.
- 7.145. London Plan Policy SI5 (Water Infrastructure) requires residential development to achieve mains water consumption of 105 litres or less per head per day, and for commercial development to achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent. The Sustainability Statement and Pre-Assessment confirm that the proposal will achieve this in accordance with policy.
- 7.146. The proposal will achieve water consumption of 105 litres or less per head per day; the development is designed with efficient water fitting with low flow rates; water consumption will be metered to allow for water management and monitoring to identify high usage and the overall consumption of the building will be calculated to meet Wat 01 credits. Therefore, the proposal fully accords with the London Plan policy SI5.
- 7.147. In respect of overheating, London Plan Policy SI4 (Managing Heat Risk) states that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. Major development proposals should demonstrate through an energy strategy how they will reduce

the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

- 7.148. The submitted Overheating Analysis (see Appendix B of the Energy Statement) concludes that a good level of thermal comfort can be expected within the proposed development. The development incorporates active cooling, as the assessment demonstrates that even with numerous passive design measures incorporated, all student rooms would experience overheating if naturally ventilated. Furthermore, filtered mechanical ventilation and active cooling will enable the windows to be kept closed for air quality and noise purposes.

Air Quality

- 7.149. London Plan Policy S11 requires development proposals to be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.
- 7.150. Local Plan Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.
- 7.151. The entire London Borough of Camden is located within an Air Quality Management Area (AQMA) and an Air Quality Focus Area (AQFA). In accordance with the London Plan Policy S11 and Local Plan Policy CC4, an Air Quality Assessment (including a Dust Risk Assessment) prepared by SRE has been submitted in support of this application.
- 7.152. The Air Quality Assessment demonstrates that in respect of the air quality to the future occupants of the proposed development, the pollutant concentrations of NO₂, PM₁₀ and PM_{2.5} at the assessed receptors are all lower than the current national air quality objectives. However local air quality exceeds NO_x targets, therefore the report recommends that filters are installed to the mechanical ventilation system to mitigate exposure.

Operational Impact of Development on Local Area

- 7.153. The Air Quality Assessment demonstrates that the proposed development is qualified as Air Quality Neutral in accordance with London Plan Policy S11 and Local Plan Policy CC4.
- 7.154. In terms of the Building Emissions Benchmark, the proposed development incorporates ASHPs which are regarded to have zero heat-related NO_x emissions in accordance with Air Quality Neutral London Plan Guidance (February 2023). In respect of Transport Emissions Benchmark, there are no motor vehicle parking spaces proposed and as such the development would be Air Quality Neutral in this regard.

Construction Impact of Development on Local Area

- 7.155. Of note, Policy CC4 requires development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an

AQA and include appropriate mitigation measures to be secured in a Construction Management Plan. The previous scheme on the site (ref. 2015/7013/P) was refused in part due to the absence of an adequate air quality report containing a construction impacts risk assessment and construction dust mitigation or monitoring. Whilst the current proposal seeks to demolish only a small part of the existing building, rather than the entirety of it as before, for avoidance of doubt the submitted Air Quality Assessment includes consideration of dust and emissions impacts, including a Dust Risk Assessment and recommends site monitoring. A Construction Management Plan (CMP) is also submitted which incorporates measures to mitigate against construction impacts including dust.

- 7.156. The Dust Risk Assessment recommends a number of mitigation measures to minimise impact during the construction and demolition phase. This includes, but not limited to, ensuring water suppression is used during demolition operations, avoiding explosive blasting and ensuring aggregates such as sand are stored appropriately. Further measures are set out within the CMP to minimise emissions during demolition and construction, including those associated with construction traffic, which can be secured through suitably worded condition.

Summary

- 7.157. In summary, the proposed development is regarded as Air Quality Neutral. Filters are recommended to the ventilation system to mitigate against NO_x for future occupants. A number of mitigation measures have been recommended during the construction phase, through the Dust Risk Assessment and the CMP, which can be secured through condition.
- 7.158. On the basis of the above, the proposed development complies with London Plan Policy SI1 and the Local Plan Policy CC4 which seek to mitigate and minimise exposure to air pollution and ensure proposals are Air Quality Neutral.

Water, Flood Risk and Sustainable Drainage

- 7.159. London Plan Policy SI12 states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. London Plan Policy SI13 states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. It also sets out a hierarchy of preference in relation to types of drainage mitigation with a presumption against impermeable surfacing and an endorsement of mitigation that achieves multiple benefits, such as enhancing biodiversity, urban greening and amenity.
- 7.160. Local Plan Policy CC3 seeks to ensure that development does not increase the flood risk and reduces risk of flooding where possible. Proposals will be required to:
- a) *incorporate water efficiency measures;*
 - b) *avoid harm to the water environment and improve water quality;*
 - c) *consider the impact of development in areas at risk of flooding (including drainage);*
 - d) *incorporate flood resilient measures in areas prone to flooding;*
 - e) *utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and*

f) *not locate vulnerable development in flood-prone areas.*

- 7.161. A Drainage Strategy Report, prepared by Price & Myers, is submitted with the application. It confirms that a Flood Risk Assessment is not required, with the Site being entirely located within Flood Zone 1. The report considers sustainable urban drainage systems in accordance with the drainage hierarchy and having due regard to the site constraints, and accordingly rainwater butts will be incorporated, as well as blue roofs proposed to the main building roof at third floor level, as well as the garden areas at ground level. This will ensure that discharge from all the roof areas from the development is restricted. The total proposed discharge rate from the development will provide a significant betterment to the existing discharge rate for the 100 year storm event. As such the proposed development through incorporation of SUDS will manage surface water rates, in accordance with the wider aims of London Plan Policy SI13 and Local Plan Policy CC3.

Transport and Highways

- 7.162. Chapter 9 of the NPPF outlines the role of transport in achieving sustainable development. Paragraph 109, states that *“significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.”*
- 7.163. Paragraph 115 adds that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
- 7.164. London Plan Policy T1 states all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.
- 7.165. London Plan Policy T4 states that when required in accordance with national or local guidance, transport statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide, and strategic level, are fully assessed.
- 7.166. In accordance with the Chapter 9 of the NPPF and the London Plan Policy T4, a Transport Statement, prepared by iTransport, has been submitted which considers the transport aspects of the proposed development against relevant planning policies.

Impact on Highway Network and Trip Generation

- 7.167. The Transport Statement concludes that the proposal will generate a negligible increase in trips to/from the site and will not result in a demonstrable impact on the Borough’s transport network.
- 7.168. In respect of trip generation, the peak period for the Methodist Church are Sunday mornings and early afternoons, which are outside the typical network peak hours. The student accommodation net trip generation is negligible across the 14-hour weekday period (7am – 9pm). Furthermore, the scheme is car-free in nature, and the majority, if not all, of the net trips to/ from the site, will be via public transport and active travel modes given the site is

located within the highest PTAL area and the new cycle parking proposed which will encourage sustainable modes of transport in accordance with the London Plan Policies T1 and T2 as well as Local Plan Policy T1.

Travel Plan

- 7.169. An outline Travel Plan is included within the Transport Statement which includes measures that will be put in place to improve access to public transport and reduce the need for parking associated with the proposal. Some of the measures includes promoting walking and cycling through providing safe and secure cycle parking spaces in accordance with the London Plan standards as well as promoting the use of Santander Cycle and Cycle rental schemes such as Lime Bikes and Forest.

Access

- 7.170. The proposal will continue to provide access into the development via both Crestfield Street and Birkenhead Street. Primary access to the church hall will be retained from Birkenhead Street. Secondary entrances to the church café, chapel and the student accommodation entrance, will be provided from Crestfield Street to minimise congestion between users of the building.
- 7.171. Both access points will be made wheelchair accessible via the proposals. An external platform lift is proposed to the Birkenhead Street entrance leading into the building. Level access will be provided from Crestfield Street into the building via an internal platform lift.
- 7.172. Internally, the rebuilt western wing of the development has been designed to incorporate a new lift serving all levels of the building, which the existing accommodation does not provide. The lift is provided near the Crestfield Street entrance given the convenient level free access from the footway to the building. In light of this, the proposals accords with paragraph 117 of the NPPF which requires developments to address the needs of disabled people and those with mobility issues.

Cycle Parking

- 7.173. London Plan Policy T2 states that proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. London Plan Policy T5 states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle by securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards.
- 7.174. Local Plan Policy T1 similarly requires the Council to promote sustainable transport by prioritising walking, cycling and public transport in the Borough. Developments must provide for accessible, secure cycle parking facilities in accordance with the London Plan.
- 7.175. For student accommodation in this location, the minimum long stay cycle parking standards are 0.75 spaces per bedroom and minimum short stay cycle parking standards are 1 space for 40 bedrooms. This equates to a requirement of 25 long stay spaces and 1 short stay space.
- 7.176. For the church, the minimum long stay cycle parking standards are 1 space per 8 full-time staff and short stay standards are set at 1 space per 100sqm (GEA). This equates to a requirement of 1 long stay space and 2 short stay spaces.

- 7.177. There is currently no cycle space provision for the existing student accommodation and church. The proposal will provide a significant enhancement in this respect, through the provision of a dedicated secure long stay cycle store for the student accommodation on the lower ground floor providing 25no. spaces in accordance with policy requirements. The store will be positioned at lower ground floor adjacent to the new lift serving the student entrance on Crestfield Street, making the location convenient and easily accessible for users.
- 7.178. Of note, the previously refused application 2015/7013/P was refused in part on grounds that the proposed cycle store storage design, location and layout would not be accessible, owing to the fact the lift did not meet the minimum dimensions in the London Cycling Design Standard. This has now been addressed and the lift meets the necessary requirements, as set out in the Transport Statement.
- 7.179. Three long stay cycle spaces for the church will be provided in a secure store on the ground floor adjacent to the main church entrance on Birkenhead Street to allow convenient access from street level. This exceeds the policy requirement of one space.
- 7.180. In terms of short stay provision, a total of 12no. cycle spaces will be provided in the form of Sheffield stands, which will be located just outside the Birkenhead Street frontage for convenience to visitors. This exceeds the combined requirement of 3 spaces for the student accommodation and church.

Car Parking

- 7.181. In respect of car parking, London Plan Policy T6 states that car-free development should be the starting point for all development proposals in places that are well-connected by public transport. This is reflected in Local Plan Policy T2. There is no car parking provision at the site due to the site constraints. This is appropriate and in accordance with planning policy, given the excellent public transport connections of the site to St Pancras and King's Cross Railway and Underground stations as well as numerous bus stops.

Deliveries, Servicing, Refuse and Recycling

- 7.182. London Plan Policy T6 requires adequate provision to be made for the efficient deliveries and servicing. London Plan Policy T7 states "*Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.*"
- 7.183. Local Plan Policy CC5 states that the Council will make sure that developments include facilities for the storage and collection of waste and recycling.
- 7.184. Due to site constraints, it is not possible to accommodate on-site servicing. The proposal will continue to be serviced on-street from the Crestfield Street carriageway, in the same manner as the existing church and student accommodation is serviced. The proposal will result in minimal delivery requirements, only 2 deliveries weekly; one for the café and one for the student accommodation, as set out in the Transport Statement.
- 7.185. However the proposal includes a dedicated refuse store provided on the Crestfield Street elevation which will facilitate easier and convenient access during collection times. Further detail can be found in the Servicing and Refuse Management Strategy at Section 6.11 of the Design and Access Statement. There will be no material change in refuse servicing demands

as a result of the proposal, with the same number and type of vehicles servicing the site as per existing arrangements.

- 7.186. As such adequate provision for refuse, recycling and servicing arrangements have been provided in accordance with London Plan Policies T6 and T7 and the Local Plan Policy CC5.

Construction Management

- 7.187. A Construction Management Plan is submitted with the application to demonstrate how impacts arising from the construction phase will be minimised in accordance with Local Plan Policies A1 and T4. Where necessary, the Applicant agrees to a suitably worded condition or obligation which requires submission of a detailed Construction Management Plan. The final Construction Management Plan can be secured via condition or a legal agreement.

Summary

- 7.188. The Transport Statement concludes that the proposal:
- Will generate a negligible increase in trips to/from the site and will not result in a demonstrable impact on the borough's transport network. Furthermore, the site is located in a highly accessible location, surrounded by and directly connected to the existing high quality active travel infrastructure and frequent and direct public transport services in the vicinity of the site.
 - Will provide cycle parking that has been provided in accordance with the London Plan standards and designed in accordance with London Cycle Design Standards (LCDS) and Camden Transport Planning Guidance.
 - Is designed to be car-free, in accordance with the London Plan.
 - Includes considered construction management measures that are provided under separate cover.
 - Includes Travel Plan measures will be put in place to encourage site users to travel to/ from the site via active travel and public transport modes and reduce the need for parking associated with the proposal

- 7.189. As such, the development proposal is considered acceptable in transport and highways terms, resulting in a negligible impact on the local highway network, and consequently the cumulative impact would be considered not 'severe' in accordance with the NPPF.

- 7.190. Instead the proposals will provide improvements to the accessibility of the church and student accommodation, and will promote active and sustainable modes of transport through the Travel Plan and through providing dedicated cycle storage where there currently is none.

Employment and Training

- 7.191. The Applicant is agreeable to securing an Employment and Training Strategy via a legal agreement. The exact Strategy is to be determined in agreement with London Borough of Camden Officers, however could include training, recruitment and/or procurement targets to meet during the construction phase.

Fire Safety

- 7.192. London Plan Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design. In respect of fire safety, part B(4) of the policy states that proposals should *“be able to be entered, used and exited safely, easily and with dignity for all”* and part B(5) states that it should *“be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.”*
- 7.193. A Fire Statement, prepared by Semper, has been submitted which demonstrates that the proposed development has been designed with due regard to London Plan Policies D12 and D5 and will fully comply with all relevant building regulations.



8. Planning Obligations.

8.1. The Applicant acknowledges the legitimate expectation for provision to mitigate against impacts arising from the development, to potentially include the following through a SIO6:

- Carbon Offset Payment
- Travel Plan
- Car Free Development
- Construction Management Plan
- Employment Training Strategy
- Public Open Space contribution

9. Conclusion.

9.1. This Planning Statement supports a full planning application for the following development at King's Cross Methodist Church, 58A Birkenhead Street, London, WC1H 8BW:

"Part demolition, extension and reconfiguration of the existing building to provide replacement church (Use Class F1) with ancillary café and student accommodation (Sui Generis), together with associated plant, cycle and refuse storage."

9.2. The Applicant has been advised by a multi-disciplinary team of consultants who have devised a suite of documents in support of this application taking into consideration the potential impacts of the proposed development, which have been carefully considered and appropriately addressed alongside relevant planning policies and material considerations. This assessment has clearly demonstrated that the proposal is in accordance with the relevant national, strategic and local planning policies.

9.3. The proposals have been developed through consultation with the Council through pre-application as well as public consultation with the local community and it has been demonstrated within this Planning Statement that the Proposed Development will provide a scheme which is wholly compliant with planning policy. Weighty material benefits of the scheme are as follows:

- The proposed development seeks to re-provide a replacement church with significantly enhanced facilities for the benefit of both church members and wider local community group users. The re-provision and enhancement of the existing church as a community facility is supported at national, regional and local level;
- The existing student accommodation is well established, having been operated by the Church for in excess of 40 years, and contributes to the mixed, inclusive and sustainable community in the area. The proposal will provide enhanced student accommodation in place of the existing which will meet modern standards and specifications, with all student rooms exceeding relevant space standards. This is a significant improvement compared to the existing dated accommodation which is of substandard size. The re-provision of student accommodation to an upgraded standard and the modest uplift of 11 student rooms is acceptable in principle in this location;
- The proposed extensions will make effective use of this small brownfield site in a highly sustainable location, optimising its development potential with due regard to its site-specific constraints in accordance with national, regional and local planning policy ;
- The proposal will deliver a bespoke high-quality design which integrates appropriately within its surroundings, having due regard to the character and appearance of the local context and enhancing the appearance of the site which has been subject to much alteration over the decades. The proposal also takes advantage of the opportunity to consider the Birkenhead Street and Crestfield Street frontages together, unifying the building on both elevations, creating a new identity within the street, and re-establishing its original prominence as a building of worship. The stepped gable form of the roof will strengthen its resemblance to a church



building with a modern re-interpretation of the original church pediment that signifies its church use;

- In respect of heritage impact, the proposal will not result in any harm to any designated built heritage assets, instead enhancing the appearance of the site. To the contrary, the proposal will result in a number of enhancements to the setting of the heritage assets as well as to the building's own local interest. It will ensure that the key elements of significance such as the historic use of the building, the altered front (Birkenhead Street) elevation, and parts of the structure are retained and enhanced. The proposed development will also cater to the need of the community and enhance the understanding of its history, resulting in significant heritage benefit and secure its long term viable use as a church consistent with its conservation;
- In respect of townscape impact, the proposal will positively contribute to the townscape of the area in terms of height, massing, proportions, fenestration, materiality and street frontage. It will enhance the area's townscape setting with a contextual and high quality new development that sits harmoniously within its sensitive as well as emerging context, and have a positive visual effect through the quality of its design, materials and through increased activity;
- The proposal will be inclusive and accessible to all, providing level access from both Birkenhead Street and Crestfield Street whereas currently there is none, and incorporating platform lifts and an internal lift so that all floors are accessible;
- The proposal will provide dedicated secure long stay cycle storage for both church users and students, as well as short-stay cycle spaces which exceed the minimum requirements. Currently the site has no cycle parking provision so this is a notable benefit;
- It has been shown through this Statement and a number of supporting documents that the proposal will not have an adverse impact upon surrounding amenity, including on air quality, noise, privacy and daylight and sunlight and will provide a good standard of accommodation for future student occupants, particularly when compared to the existing accommodation;
- The scheme as a whole will incorporate significant sustainable design measures, achieving on-site reduction in carbon emissions of 43% beyond Building Regulations (exceeding the 35% target) and will achieve BREEAM Excellent, in accordance with policy requirements. The focus of the scheme is on predominantly on retrofit of the existing building which will involve upgrading the energy efficiency of the building;
- The Transport Statement submitted with the application demonstrates that the proposed development will not have a severe impact on the local highway network. The development will provide appropriate levels of cycle parking in accordance with the aims of London Plan and Local Plan policies which seek to encourage sustainable modes of transport;
- The site currently has no landscaping. The proposal will deliver urban greening through use of soft landscaping and planters to roof and ground garden levels which will be a significant benefit through introducing urban greening and biodiversity benefits.



- 9.4. On the basis of the above, the proposed development is clearly consistent with national, strategic and local planning policy and therefore in accordance with the presumption in favour of sustainable development (Paragraph 11c of the NPPF), and as such the Council are invited to approve the development without delay.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

London

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