

# Planning Statement.

Britannia Street Car Park, London, WC1X 9BP

Prepared on behalf of Curlew Developments London Limited and  
Britannia Street Limited

27 January 2025



Confidential

KF Ref: 1130486

## Quality Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by the Originators and approved by a Partner or Associate.

<b>Date</b>	<b>Originator</b>		<b>Approved</b>	
27 January 2025	Name	James Bylina	Name	Chris Benham
	Position	Senior Planner	Position	Partner
	Signature		Signature	

## Limitations

Unless you are the Client named within this report, or have been explicitly identified by us as a party to whom we owe a duty of care and who is entitled to rely on this report, Knight Frank LLP does not owe or assume any duty of care to you in respect of the contents of this report and you are not entitled to rely upon it.

Further, and without prejudice to the above, Knight Frank accepts no responsibility or liability for the consequences of this document being used for any purpose other than for which it was commissioned.

## The Case for Development

The proposed comprehensive development of the Site to provide a PBSA-led scheme will deliver social, economic and environmental benefits. These benefits include the development of a vacant brownfield Site within a key area of central London to deliver streetscape and townscape improvements, PBSA to meet an identified need, a new community hall and improved public realm.

Through the comprehensive redevelopment of the Site, the proposal meets Camden's and the GLA's aspirations for the local area and London more broadly. These aspirations are drawn from the London Plan (2021), Camden Local Plan (2017) and other material considerations.

The Site is located in the Central Activities Zone ('CAZ') where there is general support for regeneration and development in the adopted Development Plan.

The proposed development will develop the existing vacant Site which is identified in the Kings Cross Conservation Area Statement SPG as being an "opportunity site" for redevelopment. The building is attractive, of high quality and will deliver significant enhancements to the streetscape, townscape and public realm. In accordance with NPPF paragraph 125 C the regeneration benefits of the proposal and the redevelopment of the brownfield site should be given substantial weight.

Despite the Sites central London location, it has been vacant since the 1970s. In its current form it does not positively contribute socio-economically to the area and physically detracts from the surrounding Conservation Area.

The reason the Site has laid vacant for 50+ years is the London Underground lines which lie in a cutting along the western boundary of the Site and the Thameslink railway line which sits in a shallow tunnel underneath the Site. The nature and condition of this railway infrastructure places significant structural constraints on the Site which makes bringing forward any development extremely challenging.

There have been three attempts since 2000 to develop the Site (two residential and one mixed use hotel and residential scheme), however ultimately these schemes were undeliverable owing to viability and technical reasons relating to the surrounding railway infrastructure.

The Sites structural and viability constraints are therefore significant, however the proposed development presents a viable chance to develop the Site.

The Site is extremely well connected being within a 7-minute walk of Kings Cross and St Pancras Railway and Underground Stations. Numerous prominent HEI's such as UCL, Central Saint Martins, Aga Khan University Institute and University of London are all situated within a 22-minute walk from the Site making it an ideal location for students to live in. To this affect there are over 92,000 full-time students studying at 8 HEIs within a one mile radius of the Site.

Given only 30% of full-time higher education students across London have access to university or private sector PBSA, both the London and Local Plans identify significant need for new student accommodation.

Within a 0.5 mile radius of the Site, there are a total of 4,645 student beds, representing 40.2% of full time students (11,550) living within the catchment. This equates to a gross ratio of 2.5 full-time students to every PBSA bed space. As such most of the students living in the area (6,905) live in conventional (C3) housing stock.

No other new student accommodation is proposed in the Kings Cross ward and neither has any been delivered in the ward since 2016, this is despite a growing student population and there being an identified shortfall of at least 6,433 student bed spaces within a 0.5 mile radius of the Site alone.

The Site is largely isolated from other PBSA in the ward and on this basis the delivery of an additional 121 student beds will not result in an excessive concentration of PBSA in the locality. Furthermore, one new student bed is not necessarily equal to an additional student in the area as there is a high likelihood of the PBSA absorbing students that already live in the area, at least in part, instead of adding to the total student population.

The development will positively contribute to meeting Camden's housing targets and the proposed development of 121 PBSA beds therefore represents an excellent opportunity to deliver an increase in PBSA to meet a clear significant identified local and strategic need for student accommodation, through the redevelopment of a highly sustainable previously developed site.

In addition to the provision of high-quality PBSA, the development will also deliver a 64sqm community hall at ground floor which will provide space for local residents, groups and charities to use which will help integrate the development into the wider community.

The development will also provide a substantial financial contribution for the delivery of affordable conventional housing in the area. Furthermore the Applicant continues to engage with residents of Derby Lodge to explore opportunities to deliver improvements to their courtyard amenity space.

The landscaping and public realm strategy that supports the proposed development will deliver enhanced public realm along Britannia Street and Wicklow Street which will benefit both existing local residents and future residents.

An UGF calculation which demonstrates that the Site achieves a UGF score of 0.40 and the extensive greening proposed will provide biodiversity, air quality and noise reduction benefits.

The THVIA confirms that alongside delivering beneficial Townscape and Visual Impact improvements, the development also preserves the significance of identified local heritage assets within the Kings Cross St Pancras Conservation Area. In accordance with the NPPF paragraph 212, this should be given great weight.

In summary, the Sites significant structural and viability constraints have meant it has laid empty for over 50 years. However, the proposed development presents an opportunity to bring the Site back into socio-economic use.

The proposed student accommodation will address a significant assessed need for PBSA in the area relieving pressure on the local housing market. The development will deliver a range of benefits through development of a high-quality building assisting in the regeneration of the area including the upgrading of the public realm, contributing to the delivery of new affordable housing, provision of community space, creating jobs and economic growth, and through the diversification of the local population. This should be given substantial weight in accordance with the NPPF.

## Contents

1.	Introduction	6
2.	Site Context and Background Information	9
3.	Planning History	13
4.	Pre-Application Consultation and Scheme Evolution	16
5.	The Proposed Development	22
6.	Planning Policy Framework	26
7.	Planning Assessment	31
8.	Planning Obligations	65
9.	Regeneration Statement	66
10.	Summary and Conclusion	68

## Contact details



**Chris Benham**

Partner

Planning

[chris.benham@knightfrank.com](mailto:chris.benham@knightfrank.com)

+44 2078 611 289



**James Bylina**

Senior Planner

Planning

[james.bylina@knightfrank.com](mailto:james.bylina@knightfrank.com)

+44 20 3897 0020



**Niki Walia**

Graduate Planner

Planning

[niki.walia@knightfrank.com](mailto:niki.walia@knightfrank.com)

+44 208 176 9696

## 1. Introduction

- 1.1 This Planning Statement has been prepared by Knight Frank LLP (hereinafter 'Knight Frank') on behalf of Curlew Developments London Limited and Britannia Street Limited (hereinafter 'the Applicant') in support of a Full Planning Application submitted to London Borough of Camden ('LBC') for the redevelopment of Britannia Street Car Park, London, WC1X 9BP (hereinafter 'the Site').
- 1.2 The proposed description of development is as follows:
- "Redevelopment of the Britannia Street Car Park through erection of a Purpose-Built Student Accommodation (Sui Generis) building with community floorspace (Use Class F2) provided at ground level, alongside hard and soft landscaping, cycle parking, boundary treatments and other associated works"*
- 1.3 Full details of the proposed development are set out within Section 5 of this Planning Statement and within the accompanying Design & Access Statement prepared by Sheppard Robson. In summary the proposed development comprises:
- 121 bed purpose built student accommodation ('PBSA') (Sui Generis) (including 7 accessible and 7 adaptable rooms);
  - 368 sqm of PBSA Amenity Space provided at ground, fifth, sixth and seventh floors;
  - 64 sqm (GIA) of community floorspace (Use Class F2);
  - Car-free development with the exception of 1no. blue badge car parking spaces and 2no. pay-by-hour space for local service providers;
  - 93no. long-stay and 4no. short-stay cycle spaces; and
  - Public realm improvements along Britannia Street (including tree planting) and Wicklow Street.
- 1.4 As is detailed in the accompanying Structural Design Stage 2 Report, the Site is affected by significant structural constraints resulting from the Thameslink railway tunnel running under the Site and the adjacent London Underground lines. Given the effect on the viability of the scheme, in lieu of a Nominations Agreement ('NOMS') or onsite affordable student accommodation, a financial contribution for off-site conventional affordable housing will be provided. The details of this contribution are set out in the accompanying "Report Calculating Offsite Affordable Housing Contribution" prepared by Montagu Evans.

### Curlew Developments London Limited

- 1.5 Curlew Developments London Limited is a privately owned, UK based Investment and Development Management business, that focusses on Alternative Real Estate sectors, primarily the UK PBSA sector.
- 1.6 Founded in 2011, the company has delivered over 10,000 beds through £1bn of investment into the PBSA sector across the UK and the Netherlands. This is undertaken through a mixture of forward-funding and increasingly, their own direct development.
- 1.7 Curlew have won a number of awards across the PBSA sector and recent schemes include Poland House on Stratford High Street, Textile Studios in Bermondsey and Pavilion Point in Brighton.
- 1.8 The Applicant's brief to the design team has been to create another high quality PBSA scheme which attracts the best students and support local Higher Education Institutions. As part of this the scheme will deliver social and support space to create an inclusive community and support student wellbeing. This will include industry-leading specialist management that delivers the best overall student experience with pastoral care that prioritises wellbeing and positive mental health.
- 1.9 The project team comprises experienced professionals of the highest calibre and with a significant local track record.

### Background to the Proposals

- 1.10 The Site comprises the Britannia Street Car Park, which is located within the London Borough of Camden ('LBC').
- 1.11 The Site, which is 0.1 hectares in size, is located in the Kings Cross Ward of LBC, bounded by Britannia Street to the north; three and six storey buildings to the east (Help Musicians Building and Derby Lodge apartments); Wicklow Street to the south; and by London Underground railway lines (in a cutting) to the west. The Thameslink railway tunnel also runs in a shallow tunnel beneath the western part of the Site.

- 1.12 The Site comprises undeveloped operational hardstanding in use as a privately operated car park and includes a ventilation shaft linked to the Thameslink railway tunnel running below the Site.
- 1.13 There have been several attempts to bring forward residential development on the Site, however neither the 2001 or 2007 permissions were implemented. It is our understanding that the tunnel running beneath the site made the delivery of these earlier permissions unviable, and undeliverable.
- 1.14 The area surrounding the Site largely features Victorian-style buildings, and the immediate townscape is varied in nature with buildings ranging from 3-6 storeys in height. In recent decades the areas historic warehouses have been redeveloped with the area now comprising a diverse mixed use area comprising office, creative, hotel, medical and various residential uses.
- 1.15 Emerging development such as the Royal National Throat, Nose and Ear Hospital redevelopment will punctuate the area with taller buildings of up to 15 storeys.
- 1.16 More broadly Kings Cross forms part of the 'Central London Area' which is noted for its concentration of medical, educational, cultural and research institutions forming an integral part of the Kings Cross Knowledge Quarter. Integral to this are the 11 higher education institutions (HEIs) located within a mile of the Site where 92,749 students' study.
- 1.17 To maintain the long-term viability and attractiveness of central London HEIs and the Kings Cross Knowledge Quarter more widely, it is key that students have access to high quality accommodation. As outlined in the PBSA Demand & Needs Assessment, 46% of full-time students in London currently rely on the private rented sector for accommodation. Furthermore, strong growth is projected within the catchment area and the broader London market through to the 2026/27 academic year. This growth, supported by historical trends and market evidence, is expected to exacerbate the existing shortfall in PBSA.
- 1.18 The proposed development therefore provides an opportunity to address identified need for PBSA, while also developing a vacant brownfield site. The Applicant has sought to explore opportunities for the comprehensive redevelopment of the Site, to provide high quality PBSA alongside community space for local residents and enhanced public realm.
- 1.19 The redevelopment proposals have been subject to extensive pre-application discussions with LBC Planning and Design Officers and the scheme has evolved significantly since pre-application discussions began in May 2022. The proposals have also been subject to consultation with the Camden Design Review Panel ('QRP') and local residents / stakeholders.

### Submission Documents

- 1.20 In accordance with national and local planning application validation guidelines and as confirmed with LBC, this Full Planning Application has been submitted with the following documents:
- Access Statement - Britannia Street (prepared by Direct Access Consultancy);
  - Air Quality Assessment - Britannia Street Car Park (prepared by WSP);
  - Application Form and CIL form (prepared by Knight Frank);
  - AVR images - Britannia Street (prepared by Rockhunter);
  - Bat Survey Report - Britannia Street Car Park (prepared by Greengage);
  - Circular Economy Statement - Britannia Street Car Park (prepared by Ensphere);
  - Construction Demolition Management Plan Pro Forma (prepared by Mayer Brown);
  - Contextual Daylight Sunlight and Overshadowing Assessment - Britannia Street Carpark (prepared by Point 2 Surveyors);
  - Design and Access Statement - Britannia Street (prepared by Sheppard Robson);
  - Draft Student Management Plan - Britannia Street Kings Cross London (prepared by Fresh);
  - Economic and Housing Statement - Britannia Street Car Park (prepared by Ekosgen);
  - Employment and Training Plan - Britannia Street (prepared by Curlew Developments London Limited);
  - Energy Statement - Britannia Street Car Park (prepared by Ensphere);
  - Existing and proposed plans, sections and elevations (prepared by Sheppard Robson);
  - Fire Safety Markups - Britannia Street (prepared by Helios);
  - Flood Risk Assessment and Drainage Strategy - Britannia Street Car Park (prepared by WSP);
  - Framework Delivery and Servicing Management Plan - Britannia Street (prepared by Mayer Brown);
  - Gateway 1 Fire Statement - Britannia Street (prepared by Helios);
  - Heritage, Townscape and Visual Impact Assessment - Britannia Street Car Park (prepared by Montagu Evans);
  - Internal Daylight and Sunlight Assessment - Britannia Street Carpark (prepared by Point 2 Surveyors);
  - Landscape Design and Access Statement - Britannia Street (prepared by PAD Landscapes);
  - Noise and Vibration Assessment Report - Britannia Street Car Park (prepared by WSP);
  - PBSA Demand and Needs Assessment - Britannia Street Kings Cross (prepared by Knight Frank);

- Planning Statement – including Regeneration Statement (prepared by Knight Frank);
- Preliminary Ecological Appraisal - Britannia Street Car Park (prepared by Greengage);
- Preliminary Risk Assessment - Land at Britannia Street (prepared by WSP);
- Report Calculating Offsite Affordable Housing Contribution (prepared by Montagu Evans);
- Site Location Plan (prepared by Sheppard Robson);
- Stage 2 Fire Safety Strategy Report - Britannia Street (prepared by Helios);
- Statement of Community Involvement (SCI) December 2024 - Britannia Street (prepared by Kanda Consulting);
- Structural Design Stage 2 Report - Britannia Street Car Park (prepared by WSP);
- Sustainability Statement - Britannia Street Car Park (prepared by Ensphere);
- Thermal Comfort Analysis - Britannia Street Car Park (prepared by Ensphere);
- TM54 Operational Energy Assessment - Britannia Street Car Park (prepared by Ensphere);
- Transport Assessment - Britannia Street (prepared by Mayer Brown); and
- Whole Life Carbon Assessment - Britannia Street Car Park (prepared by Ensphere).

1.21 A full list of submitted drawings is set out in the accompanying cover letter.

### Purpose and Structure of the Planning Statement

1.22 The purpose of this Planning Statement is to provide a justification in ‘town planning’ terms for the proposed development; to assess the scheme against the Development Plan and draw on other material considerations to support the case for the proposed development.

- **Section 2** sets out an overview of the Site including consideration of its wider context;
- **Section 3** describes the planning history pertinent to the proposal;
- **Section 4** summarises the planning consultations undertaken, the response to pre-application comments and the evolution of the scheme;
- **Section 5** describes the detail of the proposed development;
- **Section 6** sets out the planning policy framework against which the proposed development should be assessed;
- **Section 7** assesses the acceptability of the proposal against the Development Plan and other material considerations;
- **Section 8** outlines the proposed S106 draft Heads of Terms and Community Infrastructure Levy payments;
- **Section 9** sets out the Regeneration Statement detailing the planning benefits of the scheme including the social, economic and sustainability benefits; and
- **Section 10** concludes the Planning Statement and makes clear the reasons why the scheme should be approved in line with NPPF, the Development Plan and other material considerations.



## 2. Site Context and Background Information

### Overview

- 2.1 The following section describes the key characteristics of the Site and surrounding area. An assessment of the constraints and opportunities associated with the Site and wider area is set out within the accompanying Design and Access Statement.

### The Site

- 2.2 The Site, which is 0.1 hectares in size, is located in the Kings Cross Ward of London Borough of Camden ('LBC'), bounded by Britannia Street to the north; the three storey 'Help Musicians Building' and six storey Derby Lodge buildings to the east; Wicklow Street to the south; and London Underground railway lines (in a cutting) to the west. The Thameslink railway line also runs in a shallow tunnel beneath the western half of the Site.
- 2.3 The Site boundary is shown in **Figure 1** below.



**Figure 1: Site Location Plan**

- 2.4 The Site comprises undeveloped hardstanding in use as a privately operated car park and includes a ventilation shaft linked to the Thameslink railway tunnel running below the Site.
- 2.5 The Site is located in the Central Activities Zone ('CAZ') and centrally within the King Cross Knowledge Quarter.
- 2.6 Vehicular and pedestrian access to the Site is principally accessed via Britannia Street, a secondary access is in place on Wicklow Street, though this is gated at present.

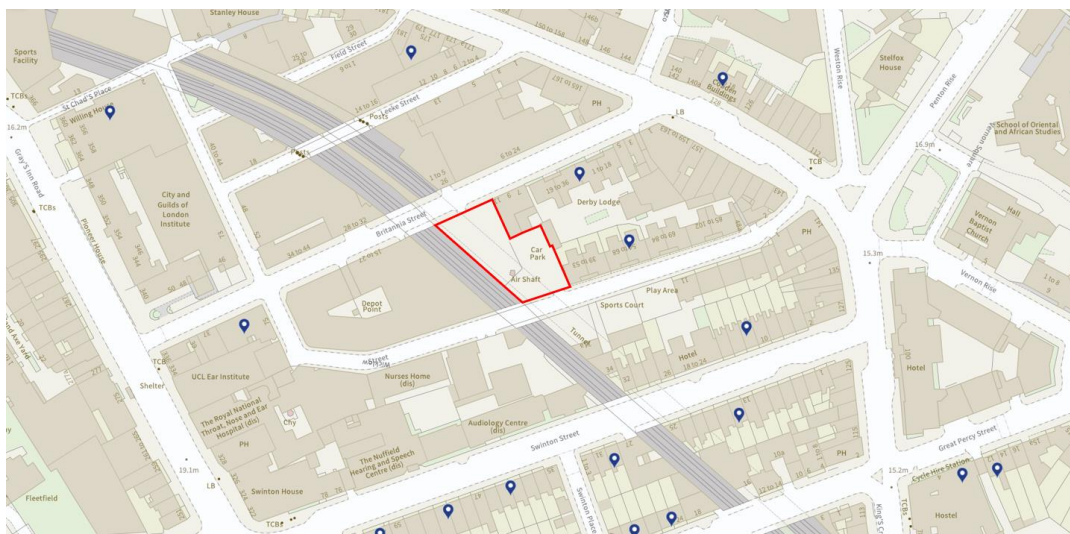
### Transport and Connectivity

- 2.7 The Site benefits from a high PTAL rating of 6b ('Excellent'), Kings Cross and St Pancras Railway and Underground Stations are located within 370 metres / 7-minute walk from the Site. There are also a number of bus stops within close proximity, with stops located at Grays Inn Road (Swinton Street Stop N - approximately 150 metres away) and Kings Cross Road (Pentonville Road Stop L - approximately 194 metres away).
- 2.8 The Site is located in close proximity to cycle routes C6 (connecting Camden, Islington and Southwark) and C27 (connecting Hammersmith and Fulham, Kensington and Chelsea, Westminster, Camden, Islington, Hackney and Waltham Forest). The closest access point to these routes is Sidmouth Street, approximately 345m south of Britannia Street. A number of Santander Cycle Hire docking stations are in close proximity to the site, including a docking station on St Chad's Street (195m away) and another on Cromer Street (approximately 200m away).

- 2.9 Given the Sites location, connectivity and proximity to numerous HEIs it is an ideal location for students, Central Saint Martins, Aga Khan University Institute and University of London are all situated within a 20 minute walk of the Site while the UCL main campus is a 22 minute walk away.
- 2.10 Further details of the Sites transport connectivity are set out in the accompanying Transport Assessment prepared by Mayer Brown.

**Townscape and Heritage**

- 2.11 The Site does not comprise any statutory or locally listed buildings, but is located within the Kings Cross St Pancras Conservation Area. Adjacent to the Site are a pair of Grade II-listed apartment blocks: Flats 1-48 Derby Lodge, fronting Britannia Street, and Flats 49-111 Derby Lodge, fronting Wicklow Street. There are several other Grade II listed buildings in the wider areas, as shown in **Figure 2** below, demonstrating the rich history of development in this part of London.



**Figure 2: Listed Buildings in proximity of the Site (Source: Historic England)**

- 2.12 The Kings Cross Conservation Area Statement SPG identifies the Site, in its current form as a surface car park, as a feature that detracts from the character of the Conservation Area and also as an “*opportunity site*” for redevelopment subject to an acceptable replacement coming forward.
- 2.13 The Site is located within an area characterised by dense urban development arranged on a regular gridded street pattern and accommodating a wide range of commercial, institutional and residential uses. The general built form of the area is influenced by its rich 19th century industrial history, and many of the surviving buildings from that period have been repurposed for new uses, taking advantage of their robust fabric and aesthetic. The present form of the Site is contrary to the established townscape character of the area, in terms of both outlook and function. There is a clear opportunity to enhance the townscape character through a sustainable, design-led development that will optimise the Site and improve its outlook and contribution to the streetscape.
- 2.14 The Site is bisected by the protected vistas of the London View Management Framework from Kenwood (Vista 3A.1 Kenwood: the viewing gazebo - in front of the orientation board to St Pauls Cathedral) and Parliament Hill (Vista 2A.1 Parliament Hill: the summit - looking toward St Pauls Cathedral to St Pauls Cathedral). The current vacant nature of the Site means it has no impact on the protected vistas, while the visual effect of the Proposed Development would be, for the most part, limited to localised views of the Site from surrounding and aligning streets.
- 2.15 Further details of the Sites townscape and heritage considerations are set out in the accompanying Heritage and Visual Impact Assessment prepared by Montagu Evans.

**Flood Risk**

- 2.16 A review of the Environment Agency’s flood risk mapping facility identifies that the majority of the Site is located within Flood Zone 1. Land in Flood Zone 1 is of low risk of flooding and has less than 0.1% annual probability of river or sea flooding.

## The Surrounding Area

- 2.17 The character and appearance of this area has been greatly influenced by its proximity to Kings Cross Station and the proliferation of associated industrial, commercial and residential development that has built up subsequently.
- 2.18 The surrounding area is characterised by the piecemeal development of varying typologies dating from the mid-19th century onwards, which has resulted in a varied height, massing and townscape context as shown in **Figure 3**. This is evident on Britannia Street, whereby there is a variety of heights and the existing and emerging surroundings step up and down creating articulated silhouettes.



**Figure 3:** Site Location and Context (Source: Google Maps)

- 2.19 In contrast the north elevation of Wicklow Street is more consistent with a stronger 6 storey datum established by Derby Lodge and Depot Point student accommodation.
- 2.20 Building heights in the area generally range from two to six storeys, while consented emerging development such as the Royal National Throat, Nose and Ear Hospital to the south-west of the Site will punctuate the area with taller buildings of up to 15 storeys. Further information on key developments in the surrounding area is detailed in Section 3.
- 2.21 The Site is located within a network of streets predominantly characterised by a mix of Victorian apartment buildings, terraced housing and historic industrial warehouse type buildings, many of which have retained their original character having been re-purposed over recent years and now incorporate office, studio and creative uses.
- 2.22 More broadly the area comprises a diverse mix of uses, to the north of the Site are predominantly non-residential with uses including offices, education, galleries and cultural venues. To the east and south of Britannia Street are more residential uses including hotels, homes and student accommodation.
- 2.23 Further analysis of the areas urban context is set out in the accompanying Design and Access Statement prepared by Sheppard Robson.

### Higher Education Institutions

- 2.24 The Site is located within the Kings Cross Knowledge Quarter, which is a partnership of 106 academic, cultural, research, scientific and media organisations in a mile-wide neighbourhood around King's Cross, Bloomsbury and Euston. Within this mile alone, there are:
- 8 higher education campuses, including:
    - University College London;
    - University of the Arts, London;
    - City, University of London;
    - SOAS, University of London; and
    - Birkbeck, University of London.
  - 92,749 students;
  - 13,700 academics;
  - 57,000 staff; and
  - 3,000 scientists.



- 2.25 The Student Demand Study, submitted in support of this application, provides detailed information on student numbers and demand for PBSA. There are currently 92,749 full-time students studying at HEIs within a one mile radius of Britannia Street, and over the period 2017/18 to 2021/22 this population has increased by 18.1% - a rate of 3,500 students per annum.
- 2.26 Within half a mile of the Site are 12 private and university owned PBSA building which provide a total of 4,645 bedspaces. This representing a provision of PBSA for only 40.2% of full time students (11,550) living within the catchment that equates to a gross ratio of 2.5 full-time students to every PBSA bed space.
- 2.27 As such there is a substantial shortfall of PBSA in the area and therefore the redevelopment of the Site provides an opportunity to deliver additional PBSA to meet identified and significant student demand.

### 3. Planning History

3.1 The following section provides a summary of the key planning history relevant to the Site and its proposed redevelopment. Consideration has also been given to relevant planning applications within the immediate area.

#### The Application Site

3.2 The Site was historically occupied by a 3 storey warehouse with a pitched roof. Following its demolition in the 1970s the Site has been used as a surface car park. While several redevelopment proposals have come forward none of them have been delivered.

3.3 The Site has an extensive planning history on the LBC planning register. The key historic planning applications are as follows:

- **2013/0592/P** | Change of use from car park (Sui Generis) to hotel (Class C1) and residential (Class C3) uses involving erection of a part two, part three and part five, six and seven storey building to provide a 121 bed hotel and 13 self-contained residential units, comprising 5 social rent (4x1 and 1x2 bed), 3 intermediate (3x2 bed) and 5 market (5x2 bed) units, and associated works following demolition of existing vent shaft to tunnel and partial demolition of boundary wall on eastern elevation. | **Refused 17/07/2013.**
- **2010/1382/P** | Renewal of Full Planning Permission Renewal of planning permission granted on 21/3/07 (2006/5860/P) for (Redevelopment of the site involving the change of use of the land from a commercial car park (Sui Generis) to residential use (Class C3) involving the erection of a part four, part five storey building to provide 23 affordable housing units (6 x 1-bed, 13 x 2-| bed, and 4 x 3 bed units), with associated amenity space, landscaping, refuse storage and cycle parking). | **Refused 16/06/2010.**
- **2010/1396/C** | Demolition works in connection with the redevelopment on the site, involving the demolition of the existing vent shaft to tunnel (reduced to ground floor level), partial demolition of boundary wall on eastern elevation. | **Approved Conservation Area Consent 08/06/2010.**
- **2006/5860/P** | Redevelopment of the site involving the change of use of the land from a commercial car park (Sui Generis) to residential use (Class C3) involving the erection of a part four, part five storey building to provide 23 affordable housing units (6 x 1-bed, 13 x 2-bed, and 4 x 3 bed units), with associated amenity space, landscaping, refuse storage and cycle parking. | **Approved 21/03/2007.**
- **PS9904306** | The erection of a part 5 storey/part 6 storey building for residential use (Class C3) providing 26 housing units with associated disabled parking bays and landscaping, together with balcony access at first to fourth floor rear and roof terraces at fourth and fifth floor level, as shown on drawing numbers PM1799/SK08E, SK09E, SK10E, SK11A, SK12B, SK13C, SK14B, SK15B, SK16 & SK17 and letter dated 12 December 2000 (St Pancras & Humanist HA) identifying Affordable Housing Units. | **Approved 05/09/2001.**

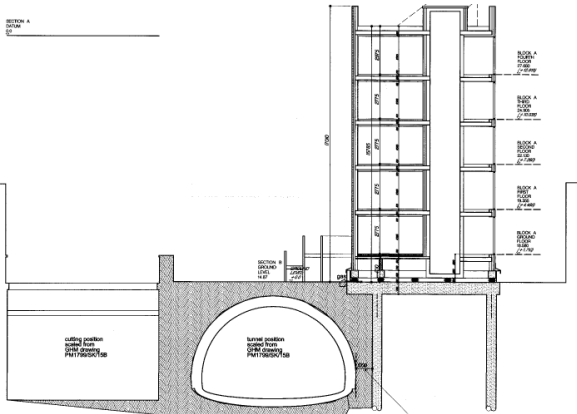
3.4 As set out above, there have been several attempts to bring forward residential development on the Site. However, neither the 2001, nor 2007 permissions were implemented due to being unviable and undeliverable. The quality of the residential developments approved was also limited as a result of the site constraints, and this in turn would have affected the ability to deliver the schemes.

3.5 **Figure 4** below shows the Site in context with the District, Circle, Hammersmith and City London Underground lines which sit in a cutting along the western boundary of the Site, as well as the Thameslink railway line which sits in a shallow tunnel underneath the Site. **Figure 5** shows that the Thameslink tunnel affects about half of the Site's total area, as such the railway infrastructure places a significant constraint to development and has had a consequential effect on previous attempts to bring forward development on the Site.

3.6 Both residential permissions (PS9904306 and 2006/5860/P) sought to avoid the Thameslink tunnel and proposed only building over the eastern half of the Site. However each proposal represented poor optimisation of the Site through the delivery of only 26 and 23 units respectively.

3.7 Despite being designed to avoid building over the Thameslink tunnel, both schemes were ultimately deemed to be undeliverable owing to viability and technical reasons relating to the railway tunnel.

3.8 It should also be noted that if proposed today, these schemes would not meet the expectations and requirements of planning policy. In addition to proposing poor optimisation of the existing Site, the schemes would not meet unit mix requirements, deliver enough dual aspect units or provide sufficient amenity space. As such these schemes would comprise substandard accommodation when assessed against current planning policy and design guidance. Additionally, such schemes would result in reduced sales values, ultimately affecting scheme viability.



**Figure 4:** Site section from application ref: 2006/5860/P



**Figure 5:** The extent of the Thameslink tunnel running under the Site.

- 3.9 Such concerns with the quality of the previously permitted residential proposals were noted during determination. The Officers Report for permission PS9904306 sets out that the development did “not fully accord with council policy in terms of residential standards and mix”. Additionally, when considering the renewal of permission 2006/5860/P in 2010, officers noted that “due to the complexity of the buildings setting and the restricted nature of the site, it is not possible for all the proposed units to meet lifetime homes standards or be wheelchair accessible”.
- 3.10 The subsequent and latest application for the Site (2013/0592/P) proposed the development of a mixed-use hotel and residential scheme. As part of this the 13 residential units would have sat on the western portion of the Site above the Thameslink tunnel, with the hotel component against the shared boundary with Derby Lodge.
- 3.11 While the development sought to better optimise the Site, the scheme was not considered acceptable and was refused partly due to Officers considering the scheme would deliver substandard accommodation. Key reasons for refusal were a failure to provide an appropriate mix of large and small homes, not meeting lifetime homes / wheelchair houses standards and inadequate outlook facing towards the London Underground lines which would provide sub-standard accommodation which would be harmful to the residential amenity of future occupiers.
- 3.12 As the planning history for the Site shows, the London Underground lines and Thameslink tunnel place significant constraints on the Site, both in terms of optimisation and deliverability. While there have been numerous attempts to bring forward development on the Site, all were ultimately undeliverable owing to viability and technical reasons or have been refused permission in part due to concerns about the quality of residential accommodation. This is a key consideration for the current proposals.
- 3.13 The applicant has engaged with Network Rail throughout the design development process and substantial structural modelling has been undertaken to inform the schemes development. The structural constraints on the development resulting dur to the cutting and tunnel are significant as is detailed in the accompanying Structural Design Stag 2 report prepared by WSP and Design and Access Statement prepared by Sheppard Robson.

### Relevant Planning History within the Surrounding Area

- 3.14 The following section provides a summary of relevant planning applications and permissions in the immediate area.
- Royal National Throat, Nose and Ear Hospital Site 330 Gray's Inn Road (and fronting Swinton Street and Wicklow Street) London WC1 | Application Ref. 2020/5593/P**
- 3.15 On the 20<sup>th</sup> July 2022, LBC granted full planning permission for the redevelopment of the former Royal National Throat, Nose and Ear Hospital site, comprising: Retention of 330 Gray's Inn Road and a two storey extension above for use as hotel (5 above ground storeys in total), demolition of all other buildings, the erection of a part 13 part 9 storey building plus upper and lower ground floors (maximum height of 15 storeys) for use as a hotel (including a cafe and restaurant); covered courtyard; external terraces; erection of a 7 storey building plus upper and lower ground floors (maximum height of 9 storeys) for use as office together with terraces; erection of a 10 storey building plus upper and lower ground floors (maximum height of 12 storeys) for use as residential on Wicklow Street and office space at lower ground and basement floors; erection of a 5 storey building plus upper and lower ground floors (maximum height of 7 storeys) for use as residential on Swinton Street and associated residential amenity space; together with a gymnasium; new basement; rooftop and basement plant; servicing; cycle storage and facilities; refuse storage; landscaping and other ancillary and associated works.
- 3.16 The application site (330 Gray's Inn Road) is located 0.1 miles south west of the Site.

**100 & 88 Gray's Inn Road and 127 Clerkenwell Road, London, WC1X 8AL | Application Ref. 2022/4259/P**

- 3.17 On the 20<sup>th</sup> December 2023, LBC granted full planning permission for demolition of 100 Gray's Inn Road and 127 Clerkenwell Road and the erection of a mixed-use office led (Class E) development comprising a basement, ground plus eight storey building for flexible retail / restaurant / office uses at ground floor and basement (Class E), basement excavation, provision of roof terraces, external plant equipment and enclosures, servicing bay, waste storage, cycle parking, public realm works; partial demolition and extension of 88 Gray's Inn Road for use of the upper floors for housing (Class C3) and ground floor as offices (Class E) with associated external alterations and associated works.
- 3.18 The application site (100 & 88 Gray's Inn Road and 127 Clerkenwell Road) is located 0.7 miles south of the Site.

**Belgrove House, Belgrove Street, London, WC1H 8AA | Application Ref. 2020/3881/P**

- On the 1<sup>st</sup> November 2023, LBC granted full planning permission 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.
- 3.19 The application site (Belgrove House) is located 0.3 miles north west of the Site.

**15-27 Britannia Street, London, WC1X 9JP | Application Ref. 2012/3082/P**

- 3.20 On the 11<sup>th</sup> September 2012, LBC granted full planning permission redevelopment of site (involving the retention of facades facing Britannia St and Wicklow St, retention of eastern blocks adjoining railway line, demolition of remainder of site, alterations and extensions, and change of use from offices (Class B1)) and erection of a mixture of 5 - 6 storey high blocks to provide Sui Generis student accommodation (226 bedrooms) with associated performance space / gallery, communal areas and an external courtyard and 2 roof terraces; two Class C3 studio flats facing Wicklow Street; and one Class B1 office unit in basement.
- 3.21 The application site (15-27 Britannia Street) is located adjacent to the Site on the western side of the London Underground lines.

**33 Wicklow Street, London, WC1X 9JX | Application Ref. 2012/6663/P**

- 3.22 On the 06<sup>th</sup> September 2013, LBC granted full planning permission for erection of part four storey/part three storey building to accommodate six residential units (comprising, 2x3 bed 3x2 bed units and 1x bed studio) units (Class C3) on existing vacant plot.
- 3.23 The application site (33 Wicklow Street) is located directly opposite the Site to the south.

**7-11 Britannia Street, London, WC1X 9JS | Application Ref. 2005/3801/P**

- 3.24 On the 04<sup>th</sup> May 2006, the Planning Inspector allowed an appeal for redevelopment of 7-11 Britannia Street, comprising the erection of a 6-storey building plus basement for use as 10 self-contained residential units (7 x 1 Bed, 3 x 3 Bed) on the upper floors (Class C3) above a ground and basement floor restaurant (Class A3) with associated ventilation plant.
- 3.25 The application site (7-11 Britannia Street) is located adjacent to the eastern boundary of the Site. It does not appear this permission has been implemented.

## 4. Pre-Application Consultation and Scheme Evolution

### Overview

- 4.1 The following section summarises the outcome of the pre-application and consultation process. Further details are also set out at pages 8 - 14 of the Design and Access Statement.
- 4.2 To inform the proposed development, the Applicant has engaged in extensive pre-application discussions with LBC, LBC Design Review Panel ('DRP') and the local community. The extensive consultation approach responds to the advice laid out within the NPPF and that contained in LBC's Statement of Community Involvement ('SCI'). In October 2023 the Applicant entered into a Planning Performance Agreement with LBC.
- 4.3 The pre-application consultation was carried out to gather feedback and to provide the opportunity for stakeholders to contribute to and shape the proposals. Full details pertaining to the consultation process are outlined in the Statement of Community Involvement prepared by Kanda, which accompanies this application.
- 4.4 The proposed development has been fully informed and shaped by a comprehensive and constructive pre-application process with LBC, which has included pre-application meetings with Planning, Policy, Design and Conservation Officers and LBC's DRP. The series of pre-application meetings that have taken place are summarised in **Table 1** below and detailed within this section.

Meeting Name	Date	Meeting Focus
Pre-app 1	20 <sup>th</sup> May 2022	Introduction, Context and General Design Strategy.
Pre-app 2	13 <sup>th</sup> July 2023	Height, particularly along Britannia Street and Justification of student use and exploration of alternatives.
Pre-app 3	1 <sup>st</sup> Sept 2023	Land Use including a hybrid option with majority PBSA and some housing.
Pre-app 4	31 <sup>st</sup> October 2023	Updates on use and Layout, scale and materiality
Pre-app 5	29 <sup>th</sup> November 2023	Refinements to scale and relationship to streetscape, alongside layout and mix updates.
DRP No.1	8 <sup>th</sup> December 2023	Overview of scheme development with planning officers to date.
Viability Meeting 1	23 <sup>rd</sup> April 2024	Scheme viability.
Pre-app 6	17 <sup>th</sup> July 2024	Updates to development constraints due to Network Rail information including changes to massing, layout and expression.
Pre-app 7	8 <sup>th</sup> August 2024	Updates to massing and particularly the response to Derby Lodge. Refinement of design concept, materiality and expression.
Pre-app 8	22 <sup>nd</sup> August 2024	Layout and massing response to Derby Lodge in the streets and courtyard. and discussion of the response to the western corners.
Pre-app 9	4 <sup>th</sup> September 2024	Massing scale and texture in adjacent streets, Derby Lodge Courtyard and from Swinton Street. Discussion of Material palette and composition.
DRP No.2	13 <sup>th</sup> September 2024	Layout and quality of accommodation including bedspaces and amenity, materiality and detail of envelope an adaptability of the layouts for alternative uses.
DRP Debrief	18 <sup>th</sup> September 2024	Discussion of key outcomes from the DRP.
Pre-app 10	23 <sup>rd</sup> October 2024	Overshadowing of neighbours, residents' experience and layout, townscape and scale.
Viability Meeting 2	15 <sup>th</sup> October 2024	Scheme viability
Pre-app 11	13 <sup>th</sup> November 2024	The team presented overshadowing, expression, layout and adaptability. Focus of discussion was on expression and appearance.
Pre-app 12	5 <sup>th</sup> December 2024	Expression and appearance of the entire scheme with numerous iterations for discussion.
Transport and Sustainability	11 <sup>th</sup> December 2024	Discussion of Transport and Sustainability matters.
Pre-app 13	13 <sup>th</sup> December 2024	Expression and appearance with a focus on the western façade.

**Table 1:** Summary of pre-application meetings



#### **Pre-application Meeting 1 – May 2022**

- 4.5 The first pre-application meeting with officers was undertaken on the 20<sup>th</sup> May 2022, the design team presented the applicants ambition to deliver a 203 bed PBSA scheme on the Site. The meeting focused on the principles of development, land use, site context and general design strategy.
- 4.6 Officers supported the principles of redeveloping the existing car park and delivering PBSA. Officers also acknowledged the Sites significant development and viability constraints associated with the adjacent railway infrastructure, however they also noted Camden’s preference for the delivery of C3 housing (their priority development land use) and requested the feasibility of delivering C3 units on the Site (both standalone and alongside PBSA) be tested.
- 4.7 In terms of design, officers raised concern with the height of the building given the local context and the impact on the Conservation Area and adjacent Listed Buildings. The potential for daylighting and overlooking impacts were also raised as requiring careful consideration.

#### **Pre-application Meeting 2 – July 2023**

- 4.8 The second pre-application meeting was undertaken on the 13<sup>th</sup> July 2023 and focused on accommodation mix, building massing and height, as well as the exploration of alternative uses on the Site as part of justifying the proposed PBSA use.
- 4.9 Officers supported the idea of providing some C3 units alongside the PBSA accommodation and noted they would prefer a provision of C3 affordable housing units instead of affordable student accommodation. Officers noted they felt there was a workable scheme on this basis.
- 4.10 In terms of the PBSA provision, whilst officers would prefer a mix of student room types, it was acknowledged this may not be possible due to viability constraints. The delivery of affordable housing was highlighted as the councils priority and therefore flexibility regarding the makeup of student rooms was accepted however this would also feed into discussions regarding height concerns.
- 4.11 Officers also noted that while a NOMS agreement would be preferred, it isn’t necessary as long as the scheme is not GLA referable.
- 4.12 In terms of massing and height, officers felt the proposed massing of the scheme had improved but still had concerns about the bulk and massing of the scheme, especially on the Britannia Street elevation. The conservation officer had a stronger view on this than the design officer who suggested changes to the massing such as chamfered corners and more setting / stepping back of the façade could overcome their concerns to some extent.

#### **Pre-application Meeting 3 – September 2023**

- 4.13 The third pre-application meeting was held on the 1<sup>st</sup> September 2023 and focused primarily on land use with extensive discussion regarding the provision of affordable C3 housing on the Site alongside PBSA.
- 4.14 Officers supported the proposal to deliver 10 social rented affordable C3 units and discussion was held on the unit mix and how the C3 provision would be balanced (in the context of scheme viability) against PBSA unit mix and provision of a NOMS.
- 4.15 Discussion was also held as to how the ground floor could be utilised to activate the street frontage.

#### **Pre-application Meeting 4 – October 2023**

- 4.16 The fourth pre-application meeting was held on the 31<sup>st</sup> October 2023, the design team presented updates on land use, layout, scale and materiality.
- 4.17 Discussion primarily focused on the massing of the proposed building. It was concluded that Officers consider the central portion of the scheme to be too tall and this should be reduced, this is alongside further amendments to the massing.
- 4.18 Officers wished to see further development and detail of the façade design at the next pre-application meeting alongside more detailed discussion of sustainability matters.
- 4.19 Officers were generally happy with the progress of the scheme and were comfortable with the proposed accommodation mix and affordable housing offer. Officers were willing to be flexible with the PBSA unit mix (provision of 100% studios) and affordable accommodation provision given the proposed C3 affordable housing offer.

### **Pre-application Meeting 5 – November 2023**

- 4.20 The fifth pre-application meeting was held on the 29<sup>th</sup> November 2023, the design team presented refinements to scale and relationship to streetscape, alongside layout and mix updates. The meeting discussion focused on land use principles, design, heritage, amenity and sustainability.
- 4.21 Officers outlined their support for the proposed student and affordable housing provision, subject to further discussion and more detailed design work.
- 4.22 The potential to provide some form of active use (retail / shared facility) on the ground floor was discussed.
- 4.23 Officers provided detailed design comments, but noted their concern that the ninth storey may cause impact to the conservation area and should be addressed. Officers also sought more detail on the quality of the proposed PBSA accommodation and its access arrangements.
- 4.24 Further detail on the impacts the development would have on Derby Lodge were also sought alongside details on sustainability matters.

### **Design Review Panel 1 – December 2023**

- 4.25 The Design and Review Panel was held on the 8<sup>th</sup> December 2023.
- 4.26 The panel considered the project to be appropriate in principle, although it was stated student accommodation should be adaptable for future use as standard housing.
- 4.27 In terms of the scheme design, the panel members noted that:
- Further work was required to ensure the architecture reflects the setting and contributes more to the surrounding area. Façades should be given more depth, and the plinth a stronger horizontality.
  - The two set-back upper storeys need greater expression for a more positive presence in views along the railway. The building's impact on the courtyard of Derby Lodge should be assessed.
  - The building should give more to the public realm at ground floor.
  - Further details on the building's internal spaces should be provided and questioned how the scheme would deliver 'best-in-class' student accommodation. Panel members commented on the internal quality and recommended light should be brought into corridors and space provided for informal encounters.
  - The communal terrace could be repositioned to improve sunlight, and residential balconies moved away from the railway.
  - The building should give more to its locality, potentially through a ground floor community use. It was advised the ground floor can be activated by moving internal amenity space to the Britannia Street frontage.
- 4.28 The panel also suggested a range of sustainability measures, these included:
- Use of cross-laminated timber to reduce embodied carbon impact;
  - Passivhaus design considered to reduce operational carbon;
  - Facades should be designed for greater climate resilience;
  - Urban Greening Factor target should be set to ensure improvements in biodiversity; and
  - The side passage proposed widened and greened to improve quality of space.

### **Pre-application Meeting 6 – July 2024**

- 4.29 Tunnel survey information received in January 2024 meant the scheme required a complete redesign to reduce the load the building would have on the surrounding railway infrastructure. As such pre-application meeting six on the 17<sup>th</sup> July 2024 focused on the project team presenting a revised PBSA only scheme design and supporting justification.
- 4.30 Officers acknowledged the structural constraints of the railway infrastructure and the principles of the scheme redesign. The revised building height was generally accepted by officers. However they noted the architectural design needed to be bolder and of high design quality to be considered acceptable.
- 4.31 Furthermore, officers raised concern with some of the revised massing and requested the buildings eastern façade be pulled away from the Site boundary to reduce the impacts it would have on Derby Lodge and the musicians building.

- 4.32 Officers supported the improvements to internal design and the quality of accommodation, but stated that a greater proportion of the amenity space should be provided at ground floor level.

#### **Pre-Application Meeting 7 (Design Workshop) – August 2024**

- 4.33 Pre-application meeting number seven was held on the 8<sup>th</sup> August 2024 and was a design workshop focused on revised scheme massing.
- 4.34 Officers noted a significant improvement to the buildings massing but sought further improvement to the eastern elevation to ensure impacts on Derby Lodge would be minimised. Extensive discussion was also undertaken in relation to façade detailing, entrance spaces and window locations.
- 4.35 Officers sought additional information in relation to daylight and sunlight impact and noted that engagement with the residents of Derby Lodge was key.

#### **Pre-Application Meeting 8 (Design Workshop) – August 2024**

- 4.36 Pre-application meeting number eight was held on the 22<sup>nd</sup> August 2024 and was a detailed design workshop focused on further scheme design and revised massing namely in terms of layout and massing response to Derby Lodge, street and courtyard elevations as well as discussion of the response to the western building corners.
- 4.37 Officers noted a further improvement to the buildings massing and façade design but sought further improvement to the eastern elevation in terms of the building line and architectural approach.

#### **Pre-Application Meeting 9 (Design Workshop) – September 2024**

- 4.38 Pre-application meeting number nine was held on the 4<sup>th</sup> September 2024 and was a further detailed design workshop focused on massing scale and texture in adjacent streets, the Derby Lodge courtyard and from Swinton Street. Detailed discussion of material palette options and façade composition was discussed in detail with officers.

#### **Design Review Panel 2 – September 2024**

- 4.39 The second Design Review Panel was held on 13<sup>th</sup> September 2024.
- 4.40 The panel did not consider the proposed height or massing to be problematic in terms of their overall townscape impact, the panel also appreciated the significant constraints of the Site (meaning the building has to be placed towards the eastern edge) but raised concern with the schemes overshadowing impact on Derby Lodge.
- 4.41 The clarity and simplicity of the overall architectural approach was also supported. However, the panel noted that the eastern elevation should seek to ‘complete’ the Derby Lodge courtyard and that the relationship between the different massing volumes was unclear and that the corners of the blocks needed further refinement.
- 4.42 The panel noted that design of elevations visible from the Derby Lodge courtyard required significant work to develop a sympathetic relationship with the existing buildings, and to provide a high-quality addition.
- 4.43 It was encouraged for the scheme to set exemplar sustainability targets as part of the public benefit. The panel was supportive that consideration had been made to issues such as glazing ratios, external shading, ventilation panels, and windows to internal corridors.
- 4.44 The panel requested further work be undertaken to investigate further sustainability measures including:
- The use of lightweight materials to help reduce embodied carbon, including cross-laminated timber where permitted;
  - Improving upon the 25% target for using ground granulated blast-furnace slag concrete in construction; and
  - Encouraging creation of open mosaic habitats on roofs in lightweight form, alongside photovoltaic cells.

#### **Pre-Application Meeting 10 – October 2024**

- 4.45 Pre-application meeting number ten was held on the 23<sup>rd</sup> October 2024 and focused on overshadowing of neighbours, residents’ experience and layout, townscape and scale.
- 4.46 Extensive discussion was held with officers in relation to daylight, sunlight and overshadowing analysis in relation to impacts on Derby Lodge and how massing could be adjusted to reduce impact. Officers requested that further overshadowing analysis be undertaken including incremental massing analysis for the Site and comparisons with comparable courtyards in the area.

#### **Pre-Application Meeting 11 – November 2024**

- 4.47 Pre-application meeting number eleven was held on the 13<sup>th</sup> November 2024, the team presented additional information in relation to overshadowing, expression, layout and adaptability.
- 4.48 Officers were supportive of the additional overshadowing analysis provided. The focus of discussion in the meeting was on the buildings expression and appearance of which officers had extensive detailed design comments. It was agreed that further design workshops would be held with officers to discuss detailed faced design options.

#### **Pre-Application Meeting 12 (Design Workshop) – December 2024**

- 4.49 Pre-application meeting number twelve was held on the 5<sup>th</sup> December 2024 and was a further detailed design workshop focused on façade expression and appearance of the entire scheme, numerous design iterations were discussed in detail with officers and agreement was reached on the direction the design should be taken forward.

#### **Transport and Sustainability Meeting – December 2024**

- 4.50 A meeting to discuss the proposed Transport and Sustainability strategies was held on the 11<sup>th</sup> December 2024. Draft documents had been provided by the project team for officers to review ahead of the meeting.
- 4.51 In terms of Transport, Mayer Brown presented the proposed transport and servicing strategy, officers were supportive of the proposed strategy but requested some additional information in relation to trip generation calculations and whether adjustments could be made to the short stay cycle parking on Britannia Street.
- 4.52 In terms of sustainability, discussion was undertaken in relation to BREEAM, water recycling, roof and cooling strategy as well as building adaptability. Overall officers were supportive of the sustainability strategy but needed to see further detail in relation to proposed energy strategy and circular economy (which would be provided within the planning application) and also requested the flood risk and drainage strategy be provided for review (which was provided following the meeting).

#### **Pre-Application Meeting 13 (Design Workshop) – December 2024**

- 4.53 Pre-application meeting number thirteen was held on the 13<sup>th</sup> December 2024 and was a further detailed design workshop focused on expression and appearance with a focus on the western façade. Matters including window heights, façade texture, colour and detailing were discussed in detail. Officers expressed their general support for the building design subject to some further design development on the matters discussed during the meeting.

#### **Viability Discussions**

- 4.54 The Sites significant structural constraints associated with the railway infrastructure sitting adjacent to and beneath the Site has placed significant viability pressures on the scheme. Viability has been an extensive point of discussion throughout the pre-application process and dedicated viability meetings were held with LBC and their viability assessors (BPS) on the 23<sup>rd</sup> April and 15<sup>th</sup> October 2024.
- 4.55 The viability discussions formed a key part of the formulation and agreement of the schemes proposed affordable provision with agreement being reached that the scheme would provide a financial contribution for offsite affordable C3 housing provision.
- 4.56 In relation to this a report calculating the offsite affordable housing contribution has been submitted as part of this application.

#### **Community Engagement**

- 4.57 This planning application is accompanied by a Statement of Community Involvement ('SCI') prepared by Kanda which provides a full and comprehensive account of stakeholder consultation undertaken by the Applicant in support of the proposal, including the responses received from the public consultation exercise.
- 4.58 Various public consultation events were held:
- Consultation with the Derby Lodge Tenant Residents Association ('TRAs') held on the 14<sup>th</sup> March 2024, in-person at the application Site – the consultation event was attended by 2 people;
  - Consultation with the Derby Lodge TRA on the 11<sup>th</sup> September 2024, in-person at the King's Cross Baptist Church – the consultation event was attended by 4 people, and included a business owner located on Wicklow Street;

- Consultation with the Derby Lodge TRA on the 19<sup>th</sup> November 2024, conducted as a Q&A session. At the session a vision book, website and floorplans were presented to attendees; and
  - Consultation with Derby Lodge TRA on 18<sup>th</sup> December 2024, held as a Q&A session. At the session plans showing amendments which had been made in response to feedback previously received were presented.
- 4.59 A social media campaign was launched on the 18<sup>th</sup> November 2024 to reach people who work and study in the area. The Social media adverts generated a total of 18,928 impressions with a reach of 6,545 people.
- 4.60 The team met with the Help Musicians Charity (occupier adjacent to the Site) on the 22<sup>nd</sup> March 2024, the charity did not have any questions at this time. The team are in the process of arranging a further meeting.
- 4.61 Kanda also approached key stakeholders and near neighbours to discuss proposals on 10<sup>th</sup> December.
- 4.62 The team set up a website for detail regarding the proposed development to be made available online along with an interactive feedback form at: [www.13BritanniaStreet.info](http://www.13BritanniaStreet.info). The website was launched on the 30<sup>th</sup> September 2024 and updated on 11<sup>th</sup> November 2024 with further information on developed plans and advised how to provide feedback and contact the team.
- 4.63 Letters were also sent to 157 residents in the surrounding area on 26<sup>th</sup> January 2024. Following this, flyers were distributed to 501 addresses surrounding the Site on 11<sup>th</sup> November 2024 informing them of proposals, inviting them to a drop-in event, sharing contact details and the address for the public consultation website.
- 4.64 Further flyers had been distributed on 11<sup>th</sup> December 2024 to 149 addresses in Derby Lodge informing them of proposals and inviting them to view information on the consultation website and to leave their feedback. Contact details were also provided, this ensured feedback was captured beyond contributions of the TRA.
- 4.65 In total 4 responses were received from the online public consultation proposals.
- 4.66 Ahead of the public consultation Kings Cross ward councillors were also contacted directly and invited to discuss the plans on 10<sup>th</sup> September 2024.
- 4.67 Overall, the feedback received throughout the public consultation process has been positive, with constructive feedback on the materiality, public realm and operation which has been reflected in the developed plans. The SCI that accompanies the application highlights those key comments received through the community engagement process, and how these comments have informed the proposed development.

## 5. The Proposed Development

5.1 This section provides an overview of the proposed development and should be read in conjunction with the Design and Access Statement prepared by Sheppard Robson.

### Introduction

5.2 This application seeks Full Planning Permission for the redevelopment of Britannia Street Car Park, London, WC1X 9BP for the erection of a PBSA-led scheme alongside the provision of community space and public realm improvement works.

5.3 The proposed description of development is as follows:

*“Redevelopment of the Britannia Street Car Park through erection of a Purpose-Built Student Accommodation (Sui Generis) building with community floorspace (Use Class F2) provided at ground level, alongside hard and soft landscaping, cycle parking, boundary treatments and other associated works”*

5.4 In summary the proposed development comprises:

- The construction of a 7 storey building comprising 121 no. PBSA bedrooms (100% studios, 7no. accessible and 7no. adaptable units)
- 368 sqm of PBSA Amenity Space provided at ground, fifth, sixth and seventh floors;
- 64 sqm (GIA) of community space, benefitting from a dedicated entrance from Wicklow Street (Use Class F2);
- Car-free development with the exception of 1no. blue badge car parking space on Britannia Street;
- 93no. long-stay and 4no. short-stay cycle spaces;
- Public realm improvements along Britannia Street (including tree planting) and Wicklow Street.

### Overview of Proposed Uses

5.5 National and local planning policy and guidance seek to focus new development towards previously developed land, and to maximise the effective use of such sites in meeting local needs. The proposed development therefore seeks to meet these objectives through the delivery of 121 student beds (Sui Generis) on previously developed, and underutilised land.

5.6 A full breakdown of the proposed quantum of new development is set out in **Table 2** below.

**Table 2.** Proposed Land Uses and Quantum

Use	Proposed Quantum (sqm) (GIA)	Proposed Quantum (sqm) (GEA)
PBSA (Sui Generis)	4,560 (121 beds)	5,265
Community Space (Use Class F2)	64	62
<b>Total</b>	4,624	5,265

### Purpose-Built Student Accommodation

5.7 The proposal will deliver 4,622 sqm (GIA) of PBSA floorspace comprising 121no. student bed spaces. The PBSA is accessed via a dedicated entrance fronting Britannia Street which opens up into a ground floor reception lobby and large student amenity space. The student amenity space is arranged across the ground and seventh floor of the building with a roof terrace also provided at roof level.

5.8 The ground floor of the building also comprises 64sqm of community space which has a dedicated entrance on Wicklow Street. The community space is connected to the ground floor student amenity space to allow it to be used by students when it is not being used by members of the wider community.

5.9 The student bed spaces themselves are arranged over floors 1 to 6.

5.10 The delivery of additional student accommodation will not only positively contribute to the area’s diverse nature but will also help meet the demands of the 92,749 full-time students studying within a one-mile radius of the Site.



### Number and Type of Bedrooms

- 5.11 The 121no. student beds will be provided in the form of 100% studios, with the rooms ranging from 17.3sqm to 34sqm in size.
- 5.12 A total of 7no. wheelchair accessible bedrooms ('WCA') are provided within the scheme, equating to 5.8% of bedrooms. Furthermore, a total of 7no. adaptable studios are provided within the scheme, through 14no. standard studios converted to 7 accessible studios (equating to 12% of rooms).
- 5.13 The accessible and adaptable rooms are dispersed throughout the building, ensuring that the accessible rooms are fully integrated into the layout of the PBSA.
- 5.14 A full breakdown is provided in **Table 3**.

**Table 3. Proposed Student Accommodation**

Room Type	Number	Proportion of Rooms (%)
Total Studio Student Rooms	121	100%
Accessible / Adaptable Student Rooms	14	11.57%

### Bedroom Layout

- 5.15 All of the bedrooms will be en-suite and equipped with a double bed, a desk and wardrobe. The architectural approach allows for generous student room sizes with standard studio rooms ranging between 17.3 sqm and 22 sqm.
- 5.16 The accessible rooms measure between 22 sqm and 34 sqm in size and providing a wheelchair accessible en-suite bathroom and allowing ample manoeuvring space around the bed, desk, wardrobe. The adaptable rooms comprise between 38 sqm and 38.5 sqm (conversion of 2no. standard rooms).
- 5.17 All PBSA bedrooms are well lit, benefiting from large windows. Whilst the units will have the option of natural ventilation, mechanical ventilation (with heat recovery) will also be incorporated into certain areas in order to preserve heat during colder months.
- 5.18 Overall, the rooms will be of the highest quality as demonstrated in the accompanying drawings and Design and Access Statement.

### Amenity Space

- 5.19 The PBSA will offer generous shared internal and external amenity spaces situated throughout the building. All amenity spaces will be accessible to all students allowing opportunities for students to gather and form connections beyond their immediate neighbours and flat mates.
- 5.20 In total the scheme includes 368 sqm of student amenity space. This comprises 244 sqm of internal amenity space available through 206 sqm at the ground floor and 38 sqm at upper floors; and external amenity space provided through 34 sqm at the ground floor courtyard and 90 sqm at the seventh floor in the form of a communal student terrace. To note, the community space can also be utilised as internal amenity areas for the PBSA use, but has not been accounted for in calculations.
- 5.21 Additional details of the proposed terrace spaces are set out in Section 7 of this Planning Statement and the accompanying Design and Access Statement prepared by Sheppard Robson and Landscaping Design Statement prepared by PAD Landscapes.
- 5.22 A breakdown of the amenity space provision per student is provided in **Table 4**.

**Table 4. Amenity space provision per student**

Amenity Space	sqm
Indoor amenity space per student	2.01
Outdoor private amenity space per student	1.02
Total amenity space per student	3.03

- 5.23 Overall, the proposed PBSA is considered to be of the highest quality, with all students benefiting from generous fully equipped studio rooms and internal and external amenity spaces.

### Affordable Housing Provision

- 5.24 As is detailed in the accompanying Structural Design Stage 2 Report, the Site is affected by significant viability constraints associated with the Thameslink railway tunnel running under the Site and the adjacent London

Underground lines. As such, in lieu of a nominations agreement or onsite affordable student accommodation, a financial contribution for off-site conventional (C3) affordable housing will be provided.

### Height, Scale and Massing

- 5.25 The Site is located within a dense urban area to the south of King's Cross Road and to the east of Gray's Inn Road, which comprises the south half the King's Cross Conservation Area. The character and appearance of this area has been greatly influenced by its proximity to Kings Cross Station and the proliferation of associated industrial, commercial and residential development that has built up subsequently.
- 5.26 The surrounding area is now characterised by the piecemeal development of varying typologies dating from the mid-19th century onwards, which has resulted in a varied height, massing and townscape context.
- 5.27 This is evident on Britannia Street (which bounds the Site to the north), whereby there is a variety of heights and the existing and emerging surroundings step up and down creating articulated silhouettes.
- 5.28 In contrast the north elevation of Wicklow Street (which bounds the Site to the south) is more consistent with a stronger 6 storey datum established by Derby Lodge and Depot Point student accommodation.
- 5.29 The hospital site to the south-west has planning permission to rise to 15 storeys which is significantly above the existing context.
- 5.30 The proposed massing complements the varied townscape of Britannia Street whilst being led by the more consistent heights on Wicklow Street. Building heights have been developed through consultation with Camden and respond to the immediate context rather than the significantly taller consent to the south.
- 5.31 The proposal comprises a building of 7no. storeys which will be slightly taller than the existing neighbouring Derby Lodge.
- 5.32 It is intended that the new building will form a focal point within this part of the Kings Cross Conservation Area, one which complements its historic character while enhancing the architectural quality through its scale, form and detailed design.

**Table 5: AOD Heights**

Number of Storeys	Roof Parapet AOD (m)	Stair core Parapet AOD	Lift overrun AOD (m)
7	38.475m	41.605m	43.175m

- 5.33 No basements are proposed on the Site.

### Design and Appearance

- 5.34 The architectural approach has been guided by the objective to deliver a high quality building in design, sustainability and operational / functional terms. The proposed development has been designed to respond to the local character of the existing Site and surrounding area, informed by a thorough analysis of the Site's history and context.
- 5.35 The scale of the proposal relates to the existing context and not the higher density, forthcoming ENT scheme to the south. The need for a robust and heavy mass to the east creates a natural division to the two lightweight masses to the west.
- 5.36 The lower element, over the rail and the bedroom cantilevered from the east are differentiated creating a clear composition of 3 elements. Pieces are carved away to the east to reinforce the building's relationship with Derby Lodge. To the east whilst the façades texture slowly relaxes as it rises up creating vertical variation and a more tactile texture at the base and more civic response at the top.
- 5.37 In terms of materiality, bright brickwork complements the palette of Derby Lodge without seeking to mimic its tones. Gently contrasting lintel detail also echo the stucco surrounds. Dark metalwork wraps the west of the proposal above 1st floor. The tone of the metalwork echoes the red-brown bricks of neighbours. This lightweight material also minimises the weight being transferred back to the eastern support structure.
- 5.38 The two storey, lightweight, element over the tunnel is wrapped in a perforated, folded metallic screen. This lower element is redolent of local, contrasting infills and is tonally close to 2 Wicklow Street. The perforate sheet has varying degrees of transparency to enrich the composition and allow light and views of planting through.
- 5.39 The design has maximised the provision of ground floor active frontages to add vitality to Britannia Street and Wicklow Street, and to ensure that the public realm and surrounding streets have active surveillance.
- 5.40 Further details regarding the design and appearance of the proposal are provided in the Design and Access Statement prepared by Sheppard Robson.



### Landscape and Public Realm

- 5.41 The proposed development includes public realm improvements along Britannia Street in the form of repaving to increase the pavement width around the main building entrance, removal of the existing vehicular access into the Site along with the planting of three street trees which will create a more attractive pedestrian environment. Similarly on Wicklow Street, there will be an increase the pavement width around community hall entrance and to remove the existing vehicular access into the Site.
- 5.42 The provision active frontages along Britannia Street and Wicklow Street will activate street frontages, provide passive surveillance through the daytime and evening periods thus improving the pedestrian experience and perception of safety.
- 5.43 Further details regarding the landscaping and public realm proposals are set out in the Landscape Design and Access Statement prepared by PAD Landscapes.

### Access

- 5.44 The site is proposed to be car-free, with the public realm designed to accommodate pedestrian and cyclist travel through the site.
- 5.45 Primary pedestrian access will be provided along the building frontage from Britannia Street, with a dedicated entrance lobby and reception provided at ground floor. A separate pedestrian entrance lobby is provided from Wicklow Street for the Community Hall. Access to the ground floor cycle store will also be provided from Wicklow Street.
- 5.46 The PBSA entrance will provide access to the main foyer. The Management Suite and Post Room will be located close to the entrance at ground floor level, to facilitate acceptance of deliveries.

### Car and Cycle Parking

- 5.47 The scheme has been developed as car free, with the exception of one on-street accessible space. The provision of this spaces makes use of additional kerb space gained from the removal of the car park accesses on Britannia Street and Wicklow Street and do not detract from the existing on-street parking stock. Any students that are Blue Badge holders would be able to utilise any on-street blue badge, resident permit holder, shared use or pay and display parking bays that are located within the local area.
- 5.48 A dedicated cycle store for the PBSA units will be provided along the southern frontage of the site with Wicklow Street. Additionally, visitor cycle parking spaces are provided fronting onto Britannia Street. Cycle parking provision has been detailed in **Table 6** below.

**Table 6.** Cycle Parking provision

Land Use	Long Stay	Short Stay	Total
Student Accommodation (Sui Generis)	93	4	97

### Servicing and Deliveries

- 5.49 Refuse collection will occur on street via Britannia Street for the PBSA units, in line with the current arrangement for adjacent buildings. A refuse store is provided at ground level with access from Britannia Street. It is expected that refuse collection will occur on street adjacent to the development, from either Britannia Street and managed by the on-site management team.
- 5.50 The waste operatives will be able to access the bin storage area on the ground floor with a direct transfer from storage to the waste collection vehicle.
- 5.51 Deliveries to the PBSA units will be made from Britannia Street, via an on-site concierge/Facilities Manager.
- 5.52 Suppliers delivering mail and small packages will be allowed to access the ground floor of the foyer to access the post boxes by the site management. Deliveries of larger parcels, food and takeaways will be made to the ground floor reception area where the resident will collect their delivery at ground level.

## 6. Planning Policy Framework

### Introduction

- 6.1 The following section provides a summary of the planning policy context relevant to the consideration of this application.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires planning applications to be determined in accordance within the Statutory Development Plan unless material considerations indicate otherwise.

### Development Plan Documents

- 6.3 For the purpose of this application, the Development Plan comprises:
- The London Plan (2021);
  - Camden Local Plan (2017);
  - Camden Site Allocations Local Plan (2013); and
  - Camden Local Plan: Policies Map (latest version).

### The London Plan (2021)

- 6.4 The following London Plan policies are considered to be the key planning policies relevant to the application:
- Policy GG1 (Building strong and inclusive communities);
  - Policy GG2 (Making the best use of land);
  - Policy H1 (Increasing housing supply);
  - Policy SD4 (The Central Activities Zone (CAZ));
  - Policy H15 (Purpose-built student accommodation);
  - Policy S1 (Developing London's social infrastructure);
  - Policy D2 (Infrastructure requirements for sustainable densities);
  - Policy D3 (Optimising site capacity through the design-led approach);
  - Policy D4 (Delivering good design);
  - Policy D5 (Inclusive design);
  - Policy D6 (Housing quality and standards);
  - Policy D7 (Accessible housing);
  - Policy D8 (Public realm);
  - Policy D12 (Fire safety);
  - Policy D14 (Noise);
  - Policy HC1 (Heritage conservation and growth);
  - Policy HC3 (Strategic and Local Views);
  - Policy HC4 (London View Management Framework);
  - Policy SI 1 (Improving air quality);
  - Policy SI 2 (Minimising greenhouse gas emissions);
  - Policy SI 4 (Managing heat risk);
  - Policy SI 5 (Water infrastructure);
  - Policy SI 7 (Reducing waste and supporting the circular economy);
  - Policy SI 12 (Flood risk management);
  - Policy SI 13 (Sustainable drainage);
  - Policy G1 (Green infrastructure);
  - Policy G5 (Urban greening);
  - Policy G6 (Biodiversity and access to nature);
  - Policy G7 (Trees and woodlands);
  - Policy T1 (Strategic approach to transport);
  - Policy T2 (Healthy Streets);
  - Policy T4 (Assessing and mitigating transport impacts);
  - Policy T5 (Cycling);
  - Policy T6 (Car parking);
  - Policy T6.1 (Residential parking); and
  - Policy T7 (Deliveries, servicing and construction).

### **Camden Local Plan 2017**

6.5 The following Local Plan policies are relevant to consider in the determination of the development proposal:

- Policy G1 (Delivery and location of growth);
- Policy H1 (Maximising housing supply);
- Policy H6 (Housing choice and mix);
- Policy H9 (Student housing);
- Policy C1 (Health and wellbeing);
- Policy C2 (Community facilities);
- Policy C6 (Access for all);
- Policy D1 (Design);
- Policy D2 (Heritage);
- Policy A1 (Managing the impact of development);
- Policy A3 (Biodiversity);
- Policy A4 (Noise and vibration);
- Policy CC1 (Climate change mitigation);
- Policy CC2 (Adapting to climate change);
- Policy CC3 (Water and flooding);
- Policy CC4 (Air quality);
- Policy T1 (Prioritising walking, cycling and public transport);
- Policy T2 (Parking and car-free development); and
- Policy DM1 (Delivery and monitoring).

### **Site Designations**

6.6 The Site is subject to the following designations:

- (London) Central Activities Zone;
- (London) Air Quality Focus Area: King's Cross / Caledonian Road area;
- (Local) Central London Area (Part of the Kings Cross Knowledge Quarter Innovation District);
- (Local / London) Kings Cross St Pancras Conservation Area; and
- (Local / London) Protected Vistas: Parliament Hill summit to St Paul's Cathedral / Kenwood viewing gazebo to St Paul's Cathedral.

### **Material considerations include:**

6.7 Other material considerations include:

- National Planning Policy Framework ('NPPF') (2024);
- National Planning Practice Guidance ('NPPG') – Housing supply and delivery (2019);
- London Plan Supplementary Planning Guidance ('SPG'); and
- LBC Supplementary Planning Guidance, otherwise known as Camden Planning Guidance ('CPG').

6.8 LBC are currently in the process of preparing a new Local Plan which sets out the councils' vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to achieve this. Once adopted, the new Local Plan will in time replace the current Camden Local Plan (2017) and Site Allocations Plan (2013).

6.9 Camden undertook a Regulation 18 consultation of the draft new Local Plan between the 17<sup>th</sup> January and 13<sup>th</sup> March 2024. However given the new Local Plan isn't expected to be adopted until Summer 2026, the policies of the emerging Local Plan have very limited weight and are therefore not considered in this Planning Statement.

### **The National Planning Policy Framework (2024)**

6.10 The Government published an updated NPPF in December 2024. The NPPF sets the framework for the preparation of development plans and is a material consideration in planning decisions. The NPPF sets out the purpose of the planning system is to contribute to the achievement of sustainable development taking account of economic, social and environmental objectives – all of which should be considered to be interdependent and therefore need to be pursued in mutually-supportive ways.

- 6.11 So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. For decision-taking this means *“approving development proposals that accord with an up-to-date development plan without delay”* (Paragraph 11).
- 6.12 Paragraph 39 goes on to state that LPA’s should approach decisions on proposed development in a positive and creative way, seeking to approve applications for sustainable development where possible.
- 6.13 The delivery of sufficient supply of homes is also at the heart of the NPPF, with the delivery of accommodation for different groups, including students, noted for the role that it performs in meeting general housing needs. The Government’s stated objective in the NPPF is to significantly boost the supply of homes.
- 6.14 The NPPF acknowledges that the planning system should promote effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (Paragraph 124).
- 6.15 Paragraph 125 c) identifies that planning decisions should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”*.
- 6.16 Paragraph 125 d) also states that decisions should *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)”*.
- 6.17 The NPPF sets out a clear rationale for high quality design, reinforcing that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.18 Finally, Paragraph 98a) of the NPPF explains planning decisions should plan positively for the provision of shared spaces and community facilities.

#### **National Planning Practice Guidance – Housing supply and delivery (2019)**

- 6.19 Paragraph 34 of the NPPG states that *“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply based on:*
- *the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or*
  - *the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation”*.

#### **London Plan Supplementary Planning Guidance**

- 6.20 The following London Plan SPG’ documents are considered relevant to this application:
- Accessible London: Achieving an Inclusive Environment SPG (2014);
  - Optimising Site Capacity: A Design-led Approach LPG (2023);
  - Fire Safety LPG – draft (2022);
  - Purpose Built Student Accommodation LPG (2024);
  - Affordable Housing and Viability SPG (2017);
  - Affordable Housing LPG – draft (2023);
  - Housing SPG (2016);
  - Social Infrastructure SPG (2015);
  - London View Management Framework SPG (‘LVMF’) (2012);
  - Air Quality Neutral LPG (2023);
  - ‘Be Seen’ energy monitoring guidance (2021);
  - The control of dust and emissions during construction and demolition (2014); and

- Sustainable Transport, Walking and Cycling LPG (2022).

#### **Local Plan Supplementary Planning Guidance**

- 6.21 Relevant Local Plan Supplementary Planning Guidance, otherwise known as Camden Planning Guidance ('CPG') documents include:

##### **Access for All CPG (2019)**

- 6.22 The Access for All CPG supports Camden Local Plan Policy C6 (Access for All) along with other relevant Local Plan policies.

##### **Air Quality CPG (2021)**

- 6.23 The Air Quality CPG provides information on key air quality issues within the borough and supports Local Plan Policy CC4 (Air Quality) along with other relevant Local Plan policies.

##### **Amenity CPG (2021)**

- 6.24 The Amenity CPG provides information on key amenity issues within the borough, including overlooking, privacy and outlook as well as daylight and sunlight, and supports Local Plan Policy A1 (Managing the impact of development).

##### **Community uses, leisure facilities and pubs CPG (2021)**

- 6.25 The Community uses, leisure facilities and pubs CPG provides details on how LBC will protect and enhance community, cultural, leisure and pub provision. The document supports Local Plan Policies C2 (Community facilities), C3 (Cultural and leisure facilities) and C4 (Public houses).

##### **Design CPG (2021)**

- 6.26 The Design CPG supports Local Plan policies to ensure all development within LBC's planning boundary meets standards as required.

##### **Developer Contributions CPG (2019)**

- 6.27 The Developer Contributions CPG sets out the approach LBC will take in relation to developer contribution and how planning obligations operate alongside Community Infrastructure Levy.

##### **Energy efficiency and adaptation CPG (2021)**

- 6.28 The Energy efficiency and adaptation CPG provides information on key energy and resource issues within the borough and supports Local Plan Policies CC1 Climate change mitigation and CC2 Adapting to climate change.

##### **Water and Flooding CPG (2019)**

- 6.29 The Water and Flooding CPG provides guidance on the water environment in Camden, water efficiency and flooding.

##### **Student Housing CPG (2019)**

- 6.30 The Student Housing CPG provides information of development of housing specifically for occupation by students and supports Local Plan Policy H9 (Student housing), along with other relevant Local Plan policies.

##### **Transport CPG (2021)**

- 6.31 The Transport CPG provides guidance on detailed transport issues including parking and car-free development and cycling facilities, supporting relevant Local Plan policies.

##### **Trees CPG (2019)**

- 6.32 The Trees CPG provides guidance for development which may affect the welfare of trees or wish to plant new trees as part of a proposed scheme.

**King's Cross / St. Pancras Conservation Area appraisal and management strategy (2003)**

- 6.33 The King's Cross / St. Pancras Conservation Area appraisal and management strategy details the current appearance of the Conservation Area to inform determination of planning applications and aid to the formulation and design of development proposals and change in this area.

## 7. Planning Assessment

7.1 This Section assesses the proposed development against the Development Plan and other material considerations. Through pre-application discussions, and as made clear by planning policy and guidance, the key matters to consider are as follows:

- Principle of redevelopment (including loss of car parking);
- Principle of PBSA;
- Provision of community space;
- Design and appearance;
- Townscape, heritage and visual impact;
- Amenity impacts including:
  - Daylight, sunlight and overshadowing;
  - Internal daylight and sunlight
  - Air quality; and
  - Noise and vibration;
- Landscaping and public realm;
- Arboriculture, Biodiversity and ecology;
- Highways and transport;
- Refuse and servicing;
- Energy;
- Sustainability;
- Flooding and drainage;
- Contamination and ground conditions;
- Fire Safety; and
- Construction and Environmental Management.

7.2 Each of these matters is considered in turn below.

### Principle of Redevelopment (including loss of car parking)

#### Policy Context

- 7.3 At the heart of the NPPF is the presumption in favour of sustainable development. Paragraph 11 states that development proposals that accord with an up-to-date development plan should be approved without delay.
- 7.4 The NPPF promotes the effective and efficient use of land in meeting the need for new homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (Paragraph 124).
- 7.5 Paragraph 125 of the NPPF further states that *“planning policies and decisions should... give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused”*.
- 7.6 Paragraph 129 of the NPPF makes clear that planning decisions should support development where it makes an efficient use of land, taking into account identified need for different types of housing and the availability of land suitable to accommodate it.
- 7.7 At the strategic level, London Plan Policy GG1 (Building strong and inclusive communities) supports developments that will help to build strong and inclusive communities; improve physical environments and generate a wide range of socio-economic benefits.
- 7.8 Policy GG2 highlights that to make the best use of land, proposals that enable the development of previously developed land will be supported, particularly small sites and where sites are well-connected to public transport and in close proximity to town and local centres. The policy further explains that those involved in planning and



development must proactively explore the potential to intensify the use of land, and promote higher density development in the most sustainable locations.

- 7.9 Policy H1 supports the development of housing on available brownfield sites including through mixed-use redevelopment of car parks. The policy also notes it will be expected development provides the maximum reasonable provision of housing where the site is underused or vacant.
- 7.10 Furthermore, Policy SD4 (The Central Activities Zone (CAZ)) emphasises the agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced. Supporting text paragraph 2.4.4 to policy explains “centres of excellence for higher and further education and research” are included within the strategic functions of the CAZ.
- 7.11 At the local level, Adopted Local Plan Policy G1 states LBC will secure high quality development and promote the most efficient use of land through supporting development which makes the best use of the Site, accounting for design quality, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the Site. Policy further notes this will also be delivered through expecting a mix of uses where appropriate, particularly in the most accessible parts of the borough; and it is expected the “most significant growth” will be achieved at highly accessible locations, particularly Central London.
- 7.12 Local Plan Policy T2 and the Sustainable Transport, Walking and Cycling LPG support the redevelopment of existing car parks for alternative uses.

### Planning Assessment

- 7.13 The Site comprises a brownfield land with excellent public transport connections, situated within the Central Activities Zone (at a strategic level) and Central London Area (at the local level).
- 7.14 In accordance with the strategic objectives of the NPPF, the London and Local Plan, the Site is in a location where development should be directed. The Site comprises under-utilised previously developed land in a prominent, highly accessible location; the exact location where development should be optimised. Furthermore, the NPPF places substantial weight on the use of such land in the most effective and efficient way to meet identified needs for uses such as PBSA.
- 7.15 As existing the Site makes an extremely limited contribution in economic, social and land use terms. Furthermore, the Kings Cross Conservation Area Statement emphasises that the Site detracts from the character of the Conservation Area and is highlighted as an opportunity for development.
- 7.16 There is a clear opportunity to make more efficient use of this land, to deliver a more positive contribution to the townscape and streetscape, and achieve the Council’s strategic aspirations through the delivery of much needed accommodation.
- 7.17 The principle of redevelopment of the Site has already been established through previous consents and has been accepted by LBC Officer’s in pre-application discussions. Furthermore and in devising the proposals, positive and productive discussions have been undertaken with Network Rail to ensure relevant access and associated provisions are accounted for.
- 7.18 The comprehensive redevelopment of the Site would provide a highly sustainable building; optimise development at the Site; address an identified strategic and local need for PBSA whilst freeing up local rented housing stock; enable the provision of flexible community space and deliver streetscape and townscape improvements. As such, the principle of comprehensive redevelopment is considered to wholly accord with the overarching objectives of national, strategic and local planning policy guidance.

### Principle of PBSA

#### Policy Context

- 7.19 At the national level, Paragraph 60 of the NPPF notes that in supporting the “Government’s objective of significantly boosting the supply of homes, is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed...”. Paragraph 63 specifically details that within the context of establishing need, the requirements of housing need for different groups (including student) should be “assessed and reflected in planning policies”.
- 7.20 National Planning Practice Guidance (paragraph 004) states that “strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock”.



- 7.21 London Plan Policy H1 sets the ten-year targets for net housing completions for each London authority; the target in Camden is 10,380 net housing completions 2019/20 – 2028/29. The housing need of students in London, whether in PBSA or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA and the completion of new PBSA therefore contributes to meeting London’s overall housing need.
- 7.22 The supporting text for Policy H1 sets out that net non-self-contained accommodation for students count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half student bedrooms/units being counted as a single home.
- 7.23 The London Plan identifies an overall strategic requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period (supporting text paragraph 4.15.2). Supporting text paragraph 4.15.3 explains that the strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the plan period with changes in higher education providers’ estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding.
- 7.24 London Plan Policy SD4 explains the CAZ should be supported and promoted “as a centre of excellence and specialist clusters” – including education functions. Supporting text paragraph 2.4.4 explains the strategic functions of the CAZ include higher and further education and research. The Purpose-built Student Accommodation LPG further supports development of PBSA in the CAZ and where PTAL Levels are 5 or 6.
- 7.25 London Plan Policy H15 explains that Boroughs should seek to ensure that local and strategic need for PBSA is addressed provided that:
- 1) The development contributes to mixed and an inclusive neighbourhood;
  - 2) The use of the accommodation is secured for students;
  - 3) The majority of bedrooms are secured through a nomination agreement (‘NOMS’) for occupation by students of one or more HEIs (including all of affordable student accommodation bedrooms);
  - 4) The maximum level of accommodation is secured as affordable student accommodation, with at least 35% secured as affordable student accommodation to follow the Fast Track Route; and
  - 5) The accommodation provides adequate functional living space for students.
- 7.26 Policy H15 further states that Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.
- 7.27 London Plan Supporting Text Paragraph 4.15.14 notes that where a PBSA development meets the policy requirements (as set out above), boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing. As such providing a provision or financial contribution towards the delivery of C3 affordable housing could be proposed as an alternative to the delivery of affordable PBSA.
- 7.28 The PBSA LPG sets out that on larger sites, the inclusion of separate conventional (C3) housing may be acceptable and even desirable as part of pursuing mixed and inclusive neighbourhood objectives.
- 7.29 At the local level, Local Plan Policy H9 supports the principle of PBSA development to meet or exceed LBC’s target of 160 additional places in student housing per year, subject to proposals meeting a number of policy tests. Development must not involve the loss of residential homes or prejudice Camden’s ability to meet their housing targets; serves HEIs that are accessible from it; having 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; complies with relevant standards; contributes to creating mixed and balanced communities; and does not create a harmful concentration of such a use in the local area.
- 7.30 Supporting text paragraph 3.247 of Policy H9 states that Student housing forms part of the Council’s overall target of 16,800 additional homes over the Plan period, this also notes that Camden’s housing target and objectives leaves the potential for 5,000 homes that could potentially be provided as PBSA housing over the Plan period which is more than double the Policy H9 target.
- 7.31 Supporting text paragraph 3.49 and Camden Authority Monitoring Report (AMR) also recognises student homes as a type of housing which contributes to the delivery of additional homes in the borough.
- 7.32 The Student Housing CPG also notes that using the 2016 trajectory, it is unlikely student housing development will prevent LBC from meeting the target for 742 additional self-contained homes per year.
- 7.33 Notwithstanding, Policy H9 notes however that where proposed student housing development is not secured as student housing that provides accommodation affordable to the student body, the Council will expect the development to provide an appropriate amount of general needs affordable housing.

- 7.34 Supporting text paragraph 3.253 explains it is expected student housing development will serve institutions within walking or cycling distance, or are accessible by public transport with existing or committed capacity to meet the demand arising from development.
- 7.35 The Student Housing CPG also states a draft Student Management plan will be required to be submitted in accordance with guidance.
- 7.36 It is evident that generally planning policy across national, strategic and local levels align in supporting the provision of PBSA, although there is some variation in the detailed criteria set out in the policies. We set out below how the proposed development meets required policy criteria.

### **Planning Assessment**

#### Student Accommodation Secured by the S106 Agreement

- 7.37 This application seeks the comprehensive redevelopment of the Site to deliver a PBSA-led scheme comprising 121no. direct let PBSA bedspaces.
- 7.38 The delivery of PBSA is supported in principle at national, regional and local level and policy acknowledges that the delivery of student accommodation will contribute towards meeting Camden's housing targets.
- 7.39 The scheme has been subject to extensive pre-application discussion with LBC officers who support the principle of PBSA development on the Site.
- 7.40 The Applicant is committed to delivering PBSA in Camden recognising the strategic London-wide and local need for this type of accommodation. The Applicant will therefore continue to work cooperatively with LBC to agree a suitable planning condition or obligation that secures the use of the proposed development for PBSA in perpetuity.

#### Affordable Student Accommodation

- 7.41 At the beginning of the pre-application process the proposed development comprised 203 units with a mix of cluster flats and studios, alongside this the Applicant proposed 35% affordable student accommodation and sought to secure a NOMS with a local HEI in accordance with London and Local Plan policy.
- 7.42 As pre-application discussions with LBC progressed, officers expressed their preference for the delivery of an element of affordable C3 housing on the Site in lieu of providing affordable student accommodation. In line with this the applicant sought to provide up to 10 affordable C3 units on the Site (depending on the unit mix).
- 7.43 However, as the pre-application and design development process progressed, the Sites structural constraints (connected to the surrounding railway infrastructure) became better understood by the design team. The structural limitations of the railway infrastructure adjacent to and beneath the Site placed significant constraints on the development and the extent of massing and floorspace deliverable on the Site.
- 7.44 As a result, the size of the scheme shrank considerably from the originally proposed 203 units (and subsequently 143 PBSA studios and 10 C3 apartments) to the current proposal for 121 PBSA studios and an off-site payment in lieu for C3 affordable housing. The significant viability constraints of the scheme have been discussed with officers and the councils viability advisors during pre-application meetings.
- 7.45 Owing to the site-specific scheme complexities arising at an advanced stage of pre-application discussions, it has been agreed with officers that it will be acceptable on this occasion to bring forward the proposal as a 100% private direct let scheme, which makes an offsite payment towards C3 affordable housing as detailed in the accompanying report calculating the offsite affordable housing contribution which has been prepared by Montagu Evans.
- 7.46 The principle of the proposed approach is considered to align with the London Plan (Paragraph 4.15.14), Local Plan Policy H9 and the PBSA LPG which all promote flexibility in the approach to the delivery of PBSA and affordable housing. The circumstances of this specific project also provide a material consideration to enable the proposed approach. As such the proposed PBSA development should be considered acceptable in accordance with national, regional and local policy, and relevant guidance.
- 7.47 Furthermore, in accordance with the Student Housing CPG, a draft Student Management Plan has been prepared by the Applicant and submitted as part of this application which proposed accommodation will be managed in accordance with.

#### Meeting Identified Strategic Needs

- 7.48 The London Plan acknowledges the strategic housing need for students across London, and seeks the delivery of 3,500 PBSA bed spaces per annum across the capital to meet this need of the plan period. The strategic need for PBSA is not broken down into Borough-level targets.
- 7.49 At the local level, Camden identifies a need for 160 additional PBSA bed spaces per year and acknowledge that there is potential for the delivery of 5,000 PBSA bedspaces over the plan period.

- 7.50 With regards to local demand for PBSA, a Student Demand Study (the 'Demand Study') has been prepared by Knight Frank in support of this application. The Demand Study identifies that there is a significant need for PBSA within the area given there are 8 Higher Education Providers (HEPs) within campuses located within a one-mile radius of the Site. The largest of which, UCL, hosts 39,942 students and is ranked 6th in the Times Higher Education UK rankings.
- 7.51 Currently there are over 92,000 full-time students studying at HEPs within a one mile radius of the Site and over the period 2017/18 to 2021/22 this population has increased by 18.1% - a rate of 3,500 students per annum.
- 7.52 In terms of demand for PBSA, there are 11,550 full-time students living within a 0.5-mile radius of the Site, of which 48.4% (5,588 students) are studying at University College London. The number of full-time students living within this catchment has increased by 17.1% over the period 2017/18-2021/22 – a rate of 420 students per annum. Fulltime international, non-UK domicile students represent 68.9% (7,961) of total full-time students living within the 0.5-mile catchment, and their number has increased by 15.4% over the period 2017/18-2021/22.
- 7.53 The two main universities within the catchment are UCL and the University of Arts, London. Analysis of changing student numbers at these two providers points to full time student numbers, collectively across these two main HEPs, increasing by 27% over the next five years – equating to 21,800 additional students.
- 7.54 In terms of supply, there are 102,018 PBSA bed spaces for students across London. Provision has increased by 53% since 2011, at an average of 2,950 bed spaces per annum. Over the same period the full-time student population has increased by over 7,000 students per annum.
- 7.55 Across a 0.5 mile radius catchment of the Site, there are a total of 4,645 beds, representing 40.2% of full time students (11,550) living within the catchment. This equates to a gross ratio of 2.5 full-time students to every PBSA bed space.
- 7.56 In terms of outlook, currently only 30% of full-time higher education students across London have access to university or private sector PBSA, while a further 24% are estimated to be living at home with parents. The remaining 46% of full-time students in London are required to find accommodation within the private rented sector. Analysis shows that full time students studying within the catchment area and across the wider London market are likely to record strong growth over the next upcoming academic cycles to 2026/27, based on historic trends and market evidence. The current development pipeline indicates just 9,225 bed spaces currently under construction across London and as a result the shortfall in PBSA is likely to increase.
- 7.57 More locally, there are no new PBSA schemes set to be delivered within a 0.5 mile radius of the Site. This sits against a current population of full-time students of 11,078 (minus students living at home with parents) representing a shortfall of 6,433 bed spaces. Over the last four cycles the full-time student population has increased by 420 students per year far and on this basis the current shortfall (of 2.5 full-time students to every PBSA bed space) is likely to increase.
- 7.58 Overall, the Demand Study demonstrates that there is a significant local need for student accommodation within a mile of the Site.
- 7.59 The London Plan also notes that the delivery of PBSA positively contributes to meeting London's overall housing targets on a 2.5:1 ratio, with the delivery of two and a half student bedrooms counted as a single home (paragraph 4.1.9).
- 7.60 London Plan Policy H1 assigns a ten-year housing target of 10,380 new housing units for Camden between 2019/20 and 2028/29 (1,038 units per annum). Whereas the Camden Local Plan (Policy H1) identifies a target of 16,800 additional homes over the Plan period between 2016/17 - 2030/31 (1,200 units per annum).
- 7.61 In accordance with the above, the delivery of 121no. student rooms at the Site would deliver the equivalent of 48.4 units towards Camden's housing target. Furthermore, the provision of PBSA will free-up local private-rented sector housing from student occupation allowing occupation by other members of the community. Assuming these homes are then occupied by non-students, Council Tax would be due which is of benefit to the local authority (this is also another reason there is need for PBSA).
- 7.62 Following the rise in student fees, students have higher expectations for the entire university experience and student accommodation is increasingly being regarded as a crucial element of this experience. Accommodation now ranks alongside the course, the location and the reputation that the institution offers. Knight Frank's own Student Accommodation Survey undertaken in 2024, alongside partners UCAS, demonstrated higher levels of satisfaction with PBSA over mainstream rental accommodation. As such it is important for the long term success of HEI's in Camden (and therefore the Knowledge Quarter more generally) that students have access to quality PBSA accommodation.
- 7.63 In consideration of the above, it is the case that the proposed increase of PBSA through the comprehensive redevelopment of the Site will meet an identified local and strategic need for student accommodation, in accordance

with the relevant parts of London Plan Policy H15 and Local Plan Policy H9. The delivery of PBSA would also contribute towards Camden's housing target in accordance with London Plan Policy H1 and Local Plan Policy H1.

7.64 In terms of location, the Site is highly accessible and its location within Central London, the CAZ and the King Cross Knowledge Quarter makes it an ideal location for PBSA with 9 HEI's being located within a mile of the Site, as such the Site is in a location where PBSA is directed by London Plan policies H1, SD4 and H15 as well as Local Plan Policy H9 and the Student Housing CPG.

Mixed and Balanced Community

7.65 London Plan Policy H15 (Purpose-built Student Accommodation) sets out that at the neighbourhood level PBSA development should contribute to a mixed and inclusive neighbourhood.

7.66 Paragraph 2.3.3 of the PBSA LPG states that PBSA should form part of a wider positive strategy in delivering mixed and inclusive neighbourhoods. The LPG also acknowledges that London's universities are disproportionately concentrated in a few areas, including within the CAZ and that PBSA has clustered in similar areas, particularly in inner London. This has diversified the student accommodation offer from the traditional, university-built PBSA, and private rented homes.

7.67 Local Plan Policy H9 states that student housing development will be supported where it contributes to creating a mixed, inclusive and sustainable community and does not create a harmful concentration of such a use in the local area.

7.68 Supporting text paragraph 3.262 notes that the creation of mixed, inclusive and sustainable communities is a particular consideration where student housing is proposed, especially given the high concentrations in some parts of Camden. The Council will therefore assess proposals for student housing having regard to any existing concentrations in the area, and the wider housing mix in the community.

7.69 In connection with this the Camden Student Housing CPG (2019) includes guidance on mixed communities and considerations for student housing. As part of this the CPG sets out that as a guide the council considers that proposals for student housing are most likely to intensify an existing concentration in a way that has an unacceptable impact on the mix, inclusiveness and sustainability of the community where one or both of the following thresholds are exceeded:

- Resident students represent over 25% of usual residents in the ward; and/ or
- The proposal would lead to over 800 beds in student housing being located within a radius of 300 metres from the proposal site.

7.70 Appendix B (Figure 6) of the Student Housing CPG sets out that in 2018 the Kings Cross ward had total population of 12,251, including 4,680 students which represented 38.2% of the ward's population. The CPG highlights that the data represents all resident students, most of whom live in the general housing stock rather than student housing.

7.71 It is important to note that the SPG states that planning applications will not necessarily be unacceptable where an area exceeds the thresholds set out above and that decisions will instead consider the impact and appropriateness of student housing proposals on a case by case basis, taking into account the specific characteristics of the proposed development and the area in which it is proposed.

7.72 The proposed development of 121 PBSA beds will not result in a concentration of over 800 student beds within 300 metres of the site given Depot Point (comprising 226 beds) is the only PBSA scheme in the ward located within 300 metres of the Site.

7.73 As is shown in **Figure 6** below, there are nine student halls of residence in the ward which provide a total of 3,198 student beds, as the figure shows, these PBSA schemes are generally clustered around the northern and southern ends of the ward, with there being only one existing PBSA building in the centre of the ward close to where the Site is located.

1. Urbanest King Cross (UCL accommodation) – 669 beds
2. Victoria Hall King's Cross – 198 beds
3. Urbanest St Pancras – 305 beds
4. Depot Point - 226 beds
5. William Goodenough House (Goodenough College) – 180 beds
6. Byron Court (NYU) – 200 beds
7. Langton Close House – 270 beds
8. London House (Goodenough College) - 300 beds
9. International Hall (UoL accommodation) – 850 beds





**Figure 6:** Kings Cross Ward boundary and PBSA locations (The Site marked in red).

- 7.74 It should be noted that since the Student Housing CPG was published in March 2019 the Boroughs ward boundaries have been altered (on 1<sup>st</sup> December 2021) with the boundary of the Kings Cross ward having changed and increased in size significantly. As such for the purpose of assessing the ward and student population in line with the requirements of the SPG, the wards current boundary and population is considered. As such the 2018 data for students in the ward set out in the CPG cannot be used as the ward level datasets do not align with the revised ward boundaries.
- 7.75 According to the Office of National Statistics (ONS) 2021 Census, the Kings Cross ward had a population of 11,462 in 2021. This makes the area the 9<sup>th</sup> most populous ward in Camden and has a relatively high population density of 10,762/km<sup>2</sup>. This reflects the character of the area and the Central London location.
- 7.76 The census data itself details that there are 2,736 student living in the ward which represent 27.2% of the wards population and 12.4% of the Boroughs total population. Its notable that this number of students is below the number of PBSA spaces available in the ward, this is likely due to the fact the census was undertaken during COVID-19 lockdown/restrictions and therefore the number of people and households usually present in Camden were elsewhere at this time. This would also have affected the data on the ward's total population.
- 7.77 In regard to the wards population of students, the PBSA LPG recognises that London's universities are disproportionately concentrated in a few areas and there are in fact 8 higher education institutions with 98,500 students studying in the King's Cross, Bloomsbury and Euston area, many of which are located within or in close proximity of the ward / Site. As such it should be expected that there would be a significant concentration of PBSA in the area which will allow students have easy access to their university.
- 7.78 It should be noted that no additional PBSA has been delivered in the ward since the completion of the 198 bed 'Victoria Hall King's Cross' scheme in 2016, as such any recent growth in the ward's student population will have been through occupation of general housing stock. Additionally, other than this proposed development (the subject of this application) there are no other PBSA developments proposed within the ward.
- 7.79 Continuing growth in student numbers and the wards proximity to 8 higher education institutions and location within the Kings Cross Knowledge Quarter means the student population will continue to grow regardless of whether additional PBSA is delivered in the ward.
- 7.80 There is strong policy support for significant increases in student accommodation in London to meet increased demand, and a need to provide this throughout the city, including locally. Furthermore, the delivery of additional

PBSA provides the opportunity to allow some housing stock to return to conventional residential use and/or allow purpose-built accommodation to absorb some of the future growth in student numbers and avoid losing more conventional housing stock to student use.

- 7.81 More generally, the area is expected to see continued population growth partly resulting from a number of residential developments coming forward within the ward including the redevelopment of the Royal National Throat, Nose and Ear Hospital which will deliver 72 residential units, Acorn House which will deliver 33 residential units and 33 Wicklow Street which will deliver 6 residential units. It should be noted that all these developments are located in very close proximity of the Site.
- 7.82 Additionally, elsewhere in the ward two residential developments within the Kings Cross Masterplan have recently completed with 'Capella' comprising 176 units and 'Cadence' comprising 163 units.
- 7.83 Based on a UK average of 2.4 people per household, these five developments alone, delivering 450 residential units, would result in a population uplift of approximately 1,080 people within the ward. It can also be expected that additional residential development will be brought forward in the ward over time which will further contribute to local population growth.
- 7.84 In addition to its residential population, it is important to consider the wards diverse and mixed-use nature. As a snapshot, there are a number of further education institutions including University of the Arts (Central St Martins), Goodenough College and Westminster Kingsway College located in the ward along with 52 hotels. Additionally, according to the Kings Cross Ward Profile (2020), there are 20,000 jobs located in the ward with the largest sectors providing employment being 'Professional & Business Services' (7,000; 35%); 'Public Services' (6,000; 30%); and 'Distribution & Hospitality' (3,000; 15%).
- 7.85 Overall, the Site is largely isolated from other PBSA in the ward and on this basis the delivery of an additional 121 student beds will not result in an excessive concentration of PBSA in the locality. One new student bed is not necessarily equal to an additional student in the area as there is a high likelihood of the PBSA absorbing students that already live in the area, at least in part, instead of adding to the total student population.
- 7.86 It is evident that the Kings Cross ward has a large, diverse and continually changing population which students are already a key part of. Students are a diverse population, and include nationalities from around the world, and different styles, attitudes and beliefs, that all have a part to play to creating a community. The delivery of additional student accommodation will not only positively contribute to the area's diverse nature but will also help meet the demands of the 98,500 students studying in the King's Cross, Bloomsbury and Euston area.
- 7.87 The Student Housing CPG also encourages PBSA development to contribute to improving community facilities and the PBSA London Planning Guidance notes that in creating mixed and inclusive neighbourhoods, an approach for PBSA schemes is to incorporate publicly accessible uses such a community facilities like meeting spaces. The proposed development includes the provision of community space at ground floor which will provide space for local residents and community groups to use while also helping to integrate the development into the wider community. The provision of community space within the scheme is considered in more detail in the section below.

#### Amenity Impacts

- 7.88 The impact of the proposed development on the amenity enjoyed by existing neighbouring residents is considered in detail in later sections of this statement, and further within the:
- Design and Access Statement;
  - Noise Impact Assessment;
  - Air Quality Assessment;
  - Daylight and Sunlight Assessment; and
  - Flood Risk Assessment.
- 7.89 As set out within the relevant sections, the proposed development will not give rise to any unacceptable amenity impacts and the proposed development is therefore acceptable in respect of criteria J of Local Plan Policy H9.

#### Adequate functional living space for students

- 7.90 The quality of the proposed PBSA is considered in detail in the design section of this statement and the supporting Design and Access Statement. As explained in the relevant section, the proposed development will provide high-quality functional living space for students and the proposed development is therefore acceptable in respect of criteria 5 of London Plan Policy H15.

## Conclusion

- 7.91 The Site is located within the Kings Cross Knowledge Quarter and is also extremely well connected being within a 7-minute walk of Kings Cross and St Pancras Railway and Underground Stations. Numerous prominent HEI's such as UCL, Central Saint Martins, Aga Khan University Institute and University of London are all situated within a 22-minute walk from the Site making it an ideal location for students to live in. To this affect there are over 92,000 full-time students studying at 8 HEIs within a one-mile radius of the Site.
- 7.92 The Student Demand Study submitted in support of this application demonstrates that there is a significant local need for additional student accommodation given only 30% of full-time higher education students across London have access to university or private sector PBSA. Both the London and Local Plans also identify significant need for new student accommodation.
- 7.93 Within a 0.5 mile radius of the Site, there are a total of 4,645 student beds, representing 40.2% of full time students (11,550) living within the catchment. This equates to a gross ratio of 2.5 full-time students to every PBSA bed space. As such most of the students living in the area (6,905) live in conventional (C3) housing stock.
- 7.94 No other new student accommodation is proposed in the Kings Cross ward and neither has any been delivered in the ward since 2016, this is despite a growing student population and there being an identified shortfall of at least 6,433 student bed spaces within a 0.5 mile radius of the Site alone.
- 7.95 As demonstrated, the Site is largely isolated from other PBSA in the ward and on this basis the delivery of an additional 121 student beds will not result in an excessive concentration of PBSA in the locality. Furthermore, one new student bed is not necessarily equal to an additional student in the area as there is a high likelihood of the PBSA absorbing students that already live in the area, at least in part, instead of adding to the total student population.
- 7.96 It is evident that the Kings Cross ward has a large, diverse and continually changing population which students are already a key part of.
- 7.97 Overall, the development will positively contribute to meeting Camden's housing targets and the proposed development of 121 PBSA beds therefore represents an excellent opportunity to deliver an increase in PBSA to meet a clear significant identified local and strategic need for student accommodation, through the redevelopment of a highly sustainable previously developed site.

## Provision of Community Space

### Policy Context

- 7.98 At the national level, Paragraph 98 of the NPPF states planning decisions should plan positively for the provision and use of community facilities to enhance the sustainability of communities and residential environments.
- 7.99 At the regional level, London Plan Policy GG1 encourages the provision of access to good quality community spaces where they accommodate, encourage and strengthen communities and will increase active participation and social integration, whilst also addressing social isolation.
- 7.100 London Plan Policy SD4 supports the development of community uses and social infrastructure meeting the needs of the CAZ.
- 7.101 London Plan Policy S1 states that development proposals that provide high quality, inclusive social infrastructure (which is defined as including community facilities) should be supported.
- 7.102 PBSA LPG notes that in creating mixed and inclusive neighbourhoods, an approach for PBSA schemes is to incorporate publicly accessible uses such a community facilities like meeting spaces.
- 7.103 At the local level, Local Plan Policy C2 also supports the delivery of community facilities.
- 7.104 The Student Hosing CPG notes that the inclusion of indoor facilities that are open to the public can help to activate ground floor frontages and assist positive interaction with the local community. Such provision will be supported where they do not compromise safety and security or the provision of shared facilities for student use.

### Planning Assessment

- 7.105 The proposed development includes the provision of 64 sqm of community floorspace at ground floor level in the form of a small community hall. Its provision within the PBSA development and in a highly sustainable location is supported by strategic, national and local planning policy.



- 7.106 As detailed within the accompanying Design and Access Statement, the community space is self-contained with its own kitchenette and toilet as well as a dedicated entrance from Wicklow Street. The space is also linked into the rest of the buildings ground floor to ensure it is integrated into the wider development. This will allow the space to be used flexibly by either members of the public or by students living within the development.
- 7.107 The community hall will be managed by the student operator, and it is anticipated that local charities and organisations will be given priority access to the space. It is also expected that the use of the space by the local community will be secured via planning obligation.

## Design and Appearance

### Policy Context

- 7.108 Section 12 of the NPPF stresses the fundamental importance of high-quality, beautiful design in the pursuit of delivering sustainable development. The NPPF sets out a clear rationale for high quality design, reinforcing that *“good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
- 7.109 At the strategic level, London Plan Policy GG1 seeks to ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
- 7.110 Policy GG2 states that in order to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, particularly in Opportunity Areas and sites within town centres. As part of this sites which are well-connected by public transport should be prioritised and the potential to intensify the use of land to support additional homes promoting higher density development should be explored proactively.
- 7.111 Policy D2 explains that the density of development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels, and be proportionate to the Site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).
- 7.112 Policy D3 explains that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity. In accordance with the Optimising Site Capacity: A Design-Led Approach LPG the *“design-led approach”* and associated process in LPG guidance has been utilised throughout pre-application discussions in developing the scheme, as evidence in the associated Design and Access statement submitted.
- 7.113 Policy D3 (B) states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling, in accordance with Policy D2.
- 7.114 Policy D4 requires Design and Access Statements to be submitted with development proposals which demonstrate that proposals meet the design requirements of the London Plan, and explains that development should be subject to design scrutiny, making use of the design review process.
- 7.115 Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design and identifies that an Inclusive Design Statement should be included within application submissions. These principles are supported by Policy D7 which explains that to provide suitable housing and genuine choice for London’s diverse population, residential development must ensure that at least 10 per cent of dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’ and all other dwellings meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.
- 7.116 London Plan Policy H15 requires student accommodation provides adequate functional living space for students.
- 7.117 The Purpose-Built Student Accommodation LPG explains that building design and spaces should provide for the different student needs and incorporate flexibility to accommodate visitors with different needs. The guidance specifies that internal and external community spaces, accessible only to students and their visitors, should be of high quality and proportionate to the number of students. These spaces should be additional to living rooms and distinct from areas accessible to the wider community and informed by factors such as the size of studio rooms.
- 7.118 The PBSA LPG also explains activating ground floors helps to make surrounding streets and public space feel safer for all, including the students themselves.



- 7.119 At the local level, adopted Policy C1 emphasises the importance of developments contributing to the creation of high-quality, active, safe, and accessible spaces. Similarly, Policy C6 highlights the expectation that buildings should achieve the highest practicable standards of accessibility and inclusive design, ensuring they can be used safely, easily, and with dignity by everyone. This is further supported in the adopted Access for All CPG.
- 7.120 Local Plan Policy D1 seeks to secure high quality design in development and sets out a series of criteria that the council will expect development design to accord with. In consideration of this the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 7.121 Local Plan Policy H9, supporting text paragraph 3.255 and the Student Housing CPG states that PBSA development should include a range of flat layouts including flats with shared facilities wherever this is practical and appropriate having regard to any constraints on the site or the development.
- 7.122 The Design and Student Housing CPGs provide additional guidance on design requirements for development. The Design CPG specifically notes the importance of maximising active frontages and the visual richness of design.
- 7.123 The Sustainable Transport, Walking and Cycling LPG acknowledges that proposals located adjacent to rail networks may require design mitigation.
- 7.124 Implementation Point 15 of the Shaping Neighbourhoods Accessible London SPG (2014) highlights the importance of ensuring that amenity spaces within developments incorporates the standards of accessible and inclusive design.
- 7.125 The Student Housing CPG outlines that LBC expects developments to include shared lounges, recreation rooms, outdoor amenity spaces, and laundry facilities. Additionally, it is noted that LBC is supportive of including publicly accessible facilities where appropriate.
- 7.126 Student Housing CPG guidance recommends 0.1 – 0.2 sqm of floorspace be provided in shared lounges / recreation rooms per bedspace, however in assessing proposals ‘qualitative and quantitative factors’ will be accounted for. The incorporation of outdoor amenity space is also encouraged. However, it is recognised that this can be challenging in the context of a densely built-up area, as such there is no requirement for a specific quantum per resident. Instead it is stated that outdoor amenity space provision should be balanced against making best use of the Site and delivering the maximum reasonable amount of housing. Guidance also encourages these are accessible, and where present they should be designed to ensure their use does not harm the amenity of occupiers and neighbours, or compromise safety and security.
- 7.127 The Student Housing CPG notes that the inclusion of indoor facilities that are open to the public can help to activate ground floor frontages and assist positive interaction with the local community. Such provision will be supported where they do not compromise safety and security or the provision of shared facilities for student use. As part of this, indoor facilities that are available to the public will only be considered as part of the provision of shared lounges and recreation rooms where they are closely integrated with the student living areas (without compromising security); and the facility provides a place for students to meet without paying a fee or making a purchase.
- 7.128 In terms of accessible accommodation, supporting text paragraph 3.257 of Local Plan Policy H9 states that in accordance with Policy H6 *“the Council will seek housing suitable for people with disabilities, and will expect a proportion of accommodation in student housing developments to be suitable for occupation by students who are wheelchair users, having regard to the proportion of wheelchair users among the student body and the wider population.”*
- 7.129 Local Plan Policy H6 states that the council will secure high quality accessible homes in all developments and will encourage design of all housing to provide functional, adaptable and accessible spaces.
- 7.130 The student Housing CPG states that student housing should be designed in line with Approved Document M: volume 2 and include the provision of least 5% of bedrooms to be wheelchair accessible.
- 7.131 Similarly, the PBSA LPG states that 5% of student rooms should be accessible and another 5% should be easily adaptable.
- 7.132 The Shaping Neighbourhoods Accessible London SPG requires accessible accommodation is distributed evenly throughout the development to ensure equality of choice for disabled residents (implementation point 25). Implementation point 33 further notes that student accommodation should be designed to ensure that disabled students and visitors can live in and visit the development as a whole, not just the accessible bedrooms.

### Planning Assessment

- 7.133 The following section considers the design and appearance of the proposed development against the relevant planning policies. The application is supported by a Design and Access Statement prepared by Sheppard Robson and Structural Design Stage 2 Report prepared by WSP which provides further detail in relation to the evolution of the scheme and the final design.

- 7.134 The design of the proposed development has emerged following a thorough review of the Sites existing and emerging context and consideration of opportunities and constraints. The design has been informed through extensive pre-application consultation with LBC which was carried out to gather feedback and provide the opportunity for stakeholders to contribute to and shape the proposals.

#### Layout and Form

The proposed development has been designed to respond to the structural constraints of the Site and the character of the area. In terms of layout and form, the proposed development completes the urban block with the building providing strong building lines along each of the Sites open edges. This is in keeping with the area which is characterised by buildings which fill their respective plots. The scheme will reinforce the streets relatively consistent building lines and reflects the historic building which formally occupied the Site.

The building will mirror the street grain with a subdivided form which echoes the texture of the neighbouring buildings including the vertical 'packets' of Derby Lodge's facade. The western facade will also be subdivided responding to the proportions of Derby Lodge's flanks and the rhythm of the adjacent railway infrastructure.

The railway tunnel running under the Site subdivides the Site and therefore the required design response, with heavy structural and servicing zones to the east and lighter more open and active amenity, community and entrance spaces to the west.

#### Density

- 7.135 The proposed development has adopted a design-led approach to density in accordance with the London Plan to optimise development at the Site. This has also been informed by the small nature of the Site and the significant structural constraints associated with the surrounding railway infrastructure.
- 7.136 The design-led approach has considered a range of design options to determine the most appropriate form of development for the Site. Further information regarding the design evolution can be found within the accompanying Design and Access Statement.
- 7.137 The Site falls within the CAZ and its very well connected by public and sustainable forms of transport. Policy GG2 supports higher density development which intensifies the use of land to support additional homes and workspaces, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 7.138 London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites.
- 7.139 Paragraph 3.2.23 of the London Plan sets out the Floor Area Ratio ('FAR') approach to assessing density.
- 7.140 The proposed development achieves a FAR of 4.68 (4,686.1sq.m GIA / 1000sq.m plot area) which is comparable to other recent developments in the area and is also below the FAR of nearby developments such as Acorn House on Gray's Inn Road which achieves a FAR of 5.88.
- 7.141 The proposed density of the development is considered appropriate given the Site's surrounding infrastructure and amenities, connectivity and accessibility, and the existing built form context of high-density buildings.
- 7.142 Notwithstanding the above, the built form context surrounding the Site continues to evolve. Emerging nearby redevelopment proposals at 33 Wicklow Street, the Royal National Throat, Nose and Ear Hospital as well as Acorn House represent further densification in the immediate context.
- 7.143 The proposed density has been informed by a design-led approach and seeks to make best use of land of previously developed land. The density responds appropriately to the existing and proposed density within the surrounding area and the Site's connectivity, and delivers a high quality proposal. The density of the proposed development is therefore considered to be acceptable and in accordance with national, strategic and local policies including GG2, D2, D3 and D1.

#### Quality of PBSA Accommodation

- 7.144 The student accommodation has been designed to a high standard, with health and wellbeing of occupants being a key consideration throughout the design process.
- 7.145 All PBSA bedrooms are en-suite and equipped with a double bed, a desk and wardrobe. The architectural approach allows for generous student room sizes with bedrooms being between 17.3 sqm and 22 sqm in size (or between 22 sqm and 34 sqm for accessible rooms).
- 7.146 In accordance with the Local Plan Policy H6, Student Housing CPG, PBSA LPG, 7no. of the 121 student bedrooms (5.8%) are designed as accessible accommodation. A further 7no. bedrooms (6.2%) are adaptable wheelchair accessible room provision to provide for potential future demand. Overall, this would allow 12% of the developments

accommodation to be accessible. Furthermore, the wheelchair accessible and adaptable rooms are distributed evenly throughout the building across all accommodation floors.

- 7.147 The accessible rooms are also generous in their size measuring between 22 and 34 sqm in size. This allows for ample manoeuvring space around the bed, desk, wardrobe and include a wheelchair accessible en-suite bathroom.
- 7.148 The PBSA will offer generous shared internal and external amenity spaces situated throughout the building. All amenity spaces will be accessible to all students allowing opportunities for students to gather and form connections beyond their immediate neighbours and flat mates.
- 7.149 In total the scheme includes 368 sqm of student amenity space (3 sqm per student). This comprises 244sqm (GIA) of internal amenity space (2sqm per student) and 124sqm of external amenity space (1sqm per student) at ground floor and roof level.
- 7.150 All amenity spaces will be accessible to all students allowing opportunities for students to gather and form connections beyond their immediate neighbours and flat mates.

#### Inclusive Design and Access

- 7.151 In accordance with London Plan Policy D5 this application is supported by an Access Statement prepared by Direct Access who are an established access consultancy company. Direct Access have worked closely with the architects, Sheppard Robson, throughout the design process.; The Access Statement demonstrates the inclusive and accessible design principles that have been incorporated into the design of the proposed development.
- 7.152 The proposals have been designed to incorporate the principles of inclusive design, providing a high standard both externally and internally.
- 7.153 The design of the proposed development incorporates the design guidance included and stipulated by the Camden Council Local Plan and Camden Planning Guidance, Approved Document Part M Building Regulations Vol 2 and applicable parts of BS8300 1 & 2 - Design of an accessible and inclusive built environment 2018.
- 7.154 Step-free level access is provided to the PBSA accommodation and community space from the street, level-access is provided throughout the ground floor and to external amenity spaces provided. All floors, across all proposed uses, are to be accessible by providing appropriately sized lifts.
- 7.155 Horizontal circulation is provided at a minimum of 1500mm width throughout the scheme with primary access routes, circulation areas and lift landings designed to provide an improved 1600mm – 2000mm width to enhance manoeuvring and turning space for disabled people, particularly for wheelchair users.
- 7.156 The quality of PBSA accommodation section above has explained the provision and size of accessible, adaptable and hoist rooms. Visitable rooms have been provided throughout to promote social integration with accessible door opening widths and wheelchair spaces accommodated within flexible furniture arrangements.
- 7.157 The wellbeing of students has been fundamental to the design of the proposed development. The provision of high quality people focused spaces has informed the overall configuration of the building, the design of the rooms and the range of internal and external amenity spaces provided throughout the PBSA. The spaces have been designed to facilitate social interaction, inclusion and community building. The Design and Access Statement prepared by Sheppard Robson provides further information on how the scheme has been designed to foster the health and wellbeing of occupants.
- 7.158 The design team have also incorporated feedback received from LBC and DRP during pre-application discussions as detailed in section 4 of this statement.
- 7.159 As demonstrated through the Accessibility Statement submitted as part of this application the proposals comply with relevant planning policy requirements relating to inclusive design and access.

#### **Conclusions**

- 7.160 In consideration of the above, it is concluded that the proposed development is of high-quality and delivers an appropriate layout and density which optimises the Site, is high quality in terms of appearance and provides high-quality PBSA, designed to be inclusive and accessible, and to contribute to the health and wellbeing of occupants.
- 7.161 The proposals have been subject to a thorough review by Camden's design officers and DRP who are supportive of the schemes design. It is therefore concluded that the design and appearance of the proposed development complies with national, regional and local planning policy.

## Townscape, Heritage and Visual Impact

### Policy Context

- 7.162 Chapter 16 of the NPPF sets out the overarching guidance relating to the preservation and enhancement of heritage assets. The key paragraphs are summarised below:
- Paragraph 207: *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance...”*
  - Paragraph 208: *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise...”*
  - Paragraph 210: *“In determining applications, local planning authorities should take account of:*
    - a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
    - b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
    - c) *the desirability of new development making a positive contribution to local character and distinctiveness.”*
  - Paragraph 212: *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
  - Paragraph 213: *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”*
  - Paragraph 215: *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
  - Paragraph 216: *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*
  - Paragraph 219: *“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”*
- 7.163 At the strategic level, London Plan Policy HC1 requires 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.
- 7.164 London Plan Policy HC3 states development proposals *“must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view”*.
- 7.165 London Plan Policy HC4 explains that development proposals *“should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers’ ability to recognise and to appreciate Strategically Important Landmarks in these views”*. It further explains that *“development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view”*.
- 7.166 Specifically Policy HC4 notes development in designated views referenced as London Panoramas *“should be managed so that development fits within the prevailing pattern of buildings and spaces, and should not detract from*

*the panorama as a whole. The management of views containing Strategically-Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the Strategically-Important Landmark in the foreground, middle ground or background where appropriate”.*

- 7.167 Policy HC4 further explains that where there is a Protected Vista present:
- *“development that exceeds the threshold height of a Landmark Viewing Corridor should be refused;*
  - *development in the Wider Setting Consultation Area should form an attractive element in its own right and preserve or enhance the viewer’s ability to recognise and to appreciate the Strategically-Important Landmark. It should not cause a canyon effect around the Landmark Viewing Corridor;*
  - *development in the background should not harm the composition of the Protected Vistas, nor the viewer’s ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not; and*
  - *development in the foreground of the wider setting consultation area should not detract from the prominence of the Strategically-Important Landmark in this part of the view.”*
- 7.168 The London View Management Framework (‘LVMF’) explains development which exceeds the threshold plane of the Landmark Viewing Corridor of a Protected Vista should be refused. Where development exceeds the threshold plane of the Wider Setting Consultation Area of a Protected Vista, it should *“preserve or enhance a viewer’s ability to recognise and appreciate the Strategically Important Landmark when seen from the Assessment Point of the Protected Vista”.*
- 7.169 The LVMF further states that within the Parliament Hill protected vista, *“new development should preserve or enhance the viewer’s ability to recognise and appreciate the Palace of Westminster in this view”.* With respect to the Kenwood Viewing Gazebo protected vista, guidance states only development above the threshold plane of the Landmark Viewing Corridor should be refused, as it would compromise the viewer’s ability to recognise the landmark,
- 7.170 At the local level, Local Plan supporting text paragraph 7.27 explains views of St Paul’s Cathedral from Kenwood and Parliament Hill will be protected *“in accordance with London-wide policy and will resist proposals that would harm them”.* Supporting text paragraph 7.28 further explains impact will also be assessed *“on the whole extent of a view (‘panorama’), not just the area in the view corridor”,* and developments *“should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces”.*
- 7.171 Local Plan supporting text paragraph 7.29-7.30 further explains locally important views which contribute *“to the interest and character of the borough”* will be protected, this includes *“views into and from conservation areas”.* It is explained that development will be sought to be compatible with such views *“in terms of setting, scale and massing”,* resisting proposals considered to cause harm to them and generally considered unacceptable if *“it obstructs important views or skylines, appears too close or too high in relation to a landmark or impairs outlines that form part of the view”.*
- 7.172 Local plan Policy D2 (Heritage) explains *“the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas...”.* Policy notes conservation areas are included as designated heritage assets, and that loss or substantial harm to these will not be permitted unless it can be demonstrated that such harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 7.173 For development in conservation areas specifically, in addition to the above Policy D2 requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.
- 7.174 The Design CPG explains the Council will account for *“cumulative impact”* when assessing proposals impact on conservation areas.
- 7.175 The Kings Cross Conservation Area Statement states the Site detracts from the character of the Conservation Area and is highlighted as an opportunity for development.

#### Planning Assessment

- 7.176 A Townscape, Heritage and Visual Impact Assessment (‘THVIA’) has been undertaken by Montagu Evans. The THVIA assesses the wider heritage and townscape impacts of the proposed development against the existing baseline and emerging context.
- 7.177 The HTVIA has assessed the impact of the proposals on identified heritage, townscape, and visual receptors.

#### Heritage

- 7.178 The principal considerations with regards to heritage assets are the impact of the Proposed Development on the character and appearance of the King’s Cross/St Pancras Conservation Area and the setting of the adjacent Grade II-listed Derby Lodge buildings.



- 7.179 With regard to the Conservation Area, the current condition of the Site comprises a vacant plot which detracts from the character and appearance of Sub Area 4. The Proposed Development, therefore, presents an opportunity to deliver an enhancement to the Conservation Area through design.
- 7.180 It is concluded that the scale of the proposals is consistent with the surrounding context, while its massing and layout would enhance the appearance and legibility of the urban grain through infilling an uncharacteristically vacant plot adjacent to the railway cutting. The form and materiality of the Proposed Development, and the outward expression of the structure, references the former industrial uses and character within the Conservation Area. However, through a contemporary approach to detailing, the building is distinguished as a modern insertion to the streetscape.
- 7.181 Overall, Montagu Evans assessment does not identify any harm to the CA deriving from the Proposed Development. Montagu Evans does however identify the following enhancements:
- Revitalisation of a poor-quality, underutilised brownfield site with an appropriate use as student accommodation;
  - Infilling a gap site with a new building of a scale, height and massing that responds to its context and completes the urban block, thus improving legibility of the Conservation Area's urban grain;
  - Introduction of a contemporary built form of high architectural quality into the streetscape, with a material palette and detailing that references its context;
  - Activation of the ground floor frontages to Britannia Street and Wicklow Street.
- 7.182 Montagu Evans draw a similar conclusion regarding the impact on the setting of the Grade II-listed Derby Lodge buildings. Whilst the Proposed Development would result in a prominent visual change to their immediate setting, when compared with the current condition, this is not considered to cause harm to their significance. In infilling the vacant plot to the immediate west with a high-quality design of an appropriate scale and massing, the Proposed Development would improve one's ability to appreciate the listed buildings within a more complete urban context. As a result, their significance as a pair of inner-London industrial dwellings would be preserved.
- 7.183 Montagu Evans has found that there would be minimal setting effects to the other identified heritage assets within the study area, and their respective significance would also be preserved.

#### Townscape and Visual Impact

- 7.184 The proposals comprise a seven storey purpose-built student accommodation building, which steps down in height to meet its neighbours to the east.
- 7.185 The building would be slightly taller than its neighbours, but overall, the scale and form would be consistent with the surrounding townscape. The Development presents as a contextual design with strong geometric form that responds to the surrounding urban grain. It would offer a modern interpretation of local historic industrial forms through the outward expression of its structure. The use of materials and the colour palette will ensure the Development will become a feature of merit in the local area, rather than a negative feature, and that positive contribution would be emphasised by the improvements to the amenity and ground floor frontages which will provide activity to an area that is currently lacking.
- 7.186 In Montagu Evans assessment of the Townscape Character Area's, which accounts for the development plan and principles of development, the overall effects will be beneficial and range from Negligible to Minor/Moderate.
- 7.187 Montagu Evans analysis of visual impact has identified the main receptors as Road Users, Residents and Students, and Tourists, Shoppers and Commuters to King's Cross. In Montagu Evans judgement the effects on these receptors range from None to Minor/Moderate and are all beneficial in nature. There would be no impacts on London View Management Framework views 2A.1 or 3A.1.

#### Policy Compliance

- 7.188 In terms of policy compliance, the HTVIA has followed the approaches set out in legislation, policy, and best practice guidance, namely the 1990 Act, the Development Plan, the NPPF, and guidance published by Historic England.
- 7.189 Furthermore, it is mindful of the great weight that should be given to the preservation of heritage assets which has been confirmed in Court judgements. To preserve the significance of a heritage asset has been defined as 'to do no harm'.
- 7.190 In accordance with the statutory duties outlined in The Planning (Listed Buildings and Conservation Areas) Act 1990, we conclude that the character and appearance of the King's Cross/St Pancras CA would be enhanced by the proposals and the significance of nearby listed buildings would be preserved.
- 7.191 Montagu Evans have not found any harm to heritage assets. The scheme has been prepared to optimise the Site in an appropriate way through a design-led approach which has included extensive consultation and engagement with the Council.



- 7.192 On this basis we consider that the proposals comply entirely with London Plan Policies D3 and HC1 and Local Plan Policies D1 and D2. The development would also comply with the relevant provisions and policy tests set out in the NPPF.

### Amenity Impacts

- 7.193 Local Plan Policy A1 states that the quality of life of communities, neighbours and occupiers will be protected and that permission for development will be granted unless this causes unacceptable harm to amenity. As part of this, the LPA will seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities.
- 7.194 This section assessed the various types of amenity impact the proposed development could have on neighbouring sites.

### **Daylight, Sunlight and Overshadowing**

#### Policy Context

- 7.195 Section 12 of the NPPF supports the development of buildings which promote good design principles and create places that provide a high standard of amenity for existing and future users (Paragraph 135(f)).
- 7.196 London Plan Policy D6 explains that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 7.197 The PBSA LPG also notes that daylight should be provided at 'good standard' in private and communal spaces.
- 7.198 Local Plan Policy A1 notes in assessing amenity impacts, sunlight, daylight and overshadowing as well as artificial light levels will be considered.
- 7.199 The Amenity CPG states the Council will consider the outcomes of assessments flexibility where appropriate, accounting for site specific circumstances and context. For example, enabling development to respect existing layout and form in historic areas and dense urban environments may require exceptions to the recommendations cited in BRE guidance to be considered. Any exceptions will be assessed on a case-by-case basis.

#### Planning Assessment – Daylight, Sunlight and Overshadowing

- 7.200 A Daylight, Sunlight and Overshadowing Assessment has been undertaken by Point 2 and submitted in support of this application which includes a detailed assessment of the potential daylight and sunlight effects of the proposed development on the key neighbouring properties.
- 7.201 It is important to note that alterations in daylight and sunlight to adjoining properties are often inevitable when undertaking any meaningful development, especially in an urban environment.
- 7.202 The proposal has been designed to ensure impacts on neighbouring daylight amenity are minimal and in-keeping with the locale, as a result the proposal demonstrates a high level of compliance with the BRE Guidance. As is detailed in the accompanying assessment, most properties will experience unnoticeable reductions of daylight, whilst reductions that are considered noticeable are minor in nature and in-keeping with the locale.
- 7.203 Where derogations are present, most are modest and in-keeping with the locale. Impacts to Derby Lodge are inevitable as the site is empty thus any additional massing will bring about noticeable reductions of daylight. Whilst some residual light levels fall below the generalised target, the residual light levels are in-keeping with existing light levels already experienced within these buildings. Furthermore, the scheme performs better than the mirror analysis assessed against 39-53 Derby Lodge, demonstrating a well-considered and appropriate scheme for the locale.
- 7.204 In terms of overshadowing, existing levels are already below the guidelines' recommendations and occur as a result of self-obstruction from Derby Lodge. Although there are derogations from the guidelines when assessed at the March equinox, the level of direct is commensurate with the existing prevailing conditions in the locale; regardless the amenity is compliant during the summer assessment on 21<sup>st</sup> June. Overall, overshadowing levels are considered acceptable.
- 7.205 As detailed in the accompanying Daylight, Sunlight and Overshadowing Assessment the proposed development would achieve a high rate of compliance with BRE guidance and as such the development should be considered compliant with policy requirements.

#### Planning Assessment – Internal and Amenity areas Daylight and Sunlight

- 7.206 An Internal Daylight and Sunlight Assessment has been prepared by Point 2 and submitted in support of this application which includes a detailed assessment of the levels of internal daylight amenity the proposed accommodation will achieve.
- 7.207 The assessments results show that the proposed development demonstrates a very high level of compliance with BRE Guidance in terms of internal daylight amenity with 86.4% of rooms meeting the recommendations for daylight amenity. It is noted that derogations are restricted to the lower floors, however many of the derogations are small with all rooms enjoying 200 lux or greater at the front of the room where the main living space is located.
- 7.208 With regards to sunlight, 79% of rooms will meet the sunlight amenity, this is a good compliance rate considering the surrounding urban context.
- 7.209 As detailed in the accompanying Internal Daylight and Sunlight Assessment the proposed development would achieve a high performance rate and as such the development should be considered compliant with policy requirements.

#### **Air Quality**

##### Policy Context

- 7.210 Paragraph 199 of the NPPF emphasises that planning decisions should sustain and contribute towards compliance with relevant limits or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, as well as the cumulative impacts of individual sites in local areas. It also highlights the importance of identifying opportunities to improve air quality and mitigate impacts, ensuring that planning decisions in these areas align with the local air quality action plan.
- 7.211 London Plan Policy SI1 explains that to tackle poor air quality, protect health and meet legal obligations development proposals must be at least Air Quality Neutral and major proposals must be supported by an Air Quality Assessment. Furthermore, the policy explains that development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality.
- 7.212 Policy SI1 further explains development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.
- 7.213 Local Plan Policy CC4 ensures that the impact of development on air quality is mitigated, and exposure to poor air quality within LBC is reduced. In assessing applications, LBC will consider both the impact of the development on air quality and the potential exposure of occupants to air pollution, with regard given to actions outlined in the Council's Air Quality Action Plan.
- 7.214 Policy CC4 also requires Air Quality Assessments where development is likely to expose residents to high levels of air pollution. Where assessments indicate the development would negatively affect air quality, it would be refused unless mitigation measures are adopted. Furthermore, policy specifies that developments introducing sensitive receptors, such as housing or schools, into areas with poor air quality will not be permitted unless they are designed to mitigate the impact.
- 7.215 When significant construction or earthworks are involved, Policy CC4 mandates that assessments of dust and emissions be included, along with appropriate mitigation measures to be secured through a Construction Management Plan.
- 7.216 Supporting text paragraph 8.81 clarifies that mitigation measures should be provided on-site. However, where impractical, assessments should demonstrate that alternative measures within the local area can provide equivalent air quality benefits. Paragraph 8.82 further outlines that measures will be expected to be included to ensure occupant exposure to air pollution is reduced to acceptable levels. For major developments located in relevant areas, there is an expectation that solutions will be implemented to local problems of air quality, which may involve various design strategies and buffers.
- 7.217 The Air Quality CPG states "*best practice measures*" should be adopted during construction and demolition work in order to reduce and mitigate air pollution emissions. Furthermore, CPG guidance explains adopting sustainable building design leads to lower NO<sub>x</sub> emissions through reduction of thermal heat losses and less gas use.

##### Planning Assessment

- 7.218 An Air Quality Assessment has been prepared by WSP and is submitted in support of this application. The assessment addresses the potential air quality impacts during both the construction and operational phases of the

proposed development. For both phases, the type, source and significance of potential impacts are identified, and the measures that should be employed to minimise these proposed.

- 7.219 The proposed development lies within the King's Cross / Caledonian Road area Air Quality Focus Area ('AQFA'), additionally the Marylebone Road from Marble Arch/Euston/King's Cross Junction AQFA is located approximately 180m west of the Site. The Angel Town Centre AQFA is located approximately 500m northeast of the Site.
- 7.220 The assessment concludes that overall the Site is suitable for the proposed development and is unlikely to expose new receptors to poor air quality.
- 7.221 During construction, a medium risk of dust soiling and a low risk to human health due to increased particulate matter concentrations from construction activities was identified. However, the impact of dust, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions can be significantly reduced through good site practices and the implementation of mitigation measures. Since construction activities are temporary and intermittent, the residual effects of dust, PM<sub>10</sub>, and PM<sub>2.5</sub> on air quality will be insignificant.
- 7.222 Further to the above, the predicted changes in traffic flows during the construction and operational phases fall below the required screening criteria that would trigger a quantitative assessment for locations inside an Air Quality Management Area. It is anticipated that the proposed development will not have a significant effect on local air quality, and the assessment of air quality impacts associated with its construction and operation has been scoped out.
- 7.223 In relation to the operational phase exposure assessment, the predicted future year concentrations are generally below the relevant air quality standards. However, the PM<sub>2.5</sub> annual mean concentrations are predicted to marginally exceed the 2030 target. However, mechanical ventilation with inlets at roof level is proposed and therefore exposure of future site users to concentrations above the air quality standards is not anticipated.
- 7.224 Overall, the proposed development is anticipated to have a minimal impact on local air quality. The assessment has demonstrated that the proposed development is considered to be air quality neutral in terms of building emissions and transport emissions, aligns with national and local air quality policies and that appropriate mitigation measures are in place to address potential issues related to construction activities.
- 7.225 In consideration of the above, it is concluded that the proposed development will not result in unacceptable amenity impacts with respect of air quality and therefore the proposed development complies with policy requirements.

## Noise and Vibration

### Policy Context

- 7.226 Paragraph 187 of the NPPF states that, "*planning policies and decisions should contribute to and enhance the natural and local environment by [...] preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of [...] noise pollution.*"
- 7.227 London Plan Policy D14 explains that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by avoiding significant adverse noise impacts on health and quality of life and by mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.
- 7.228 Local Plan Policy A1 highlights that noise and vibration levels will be considered when assessing amenity impacts. Supporting text paragraph 6.20 further explains that when sensitive uses are proposed near existing sources of noise, or when developments likely to generate noise are planned, LBC will require an acoustic report to be submitted with the application.
- 7.229 Local plan Policy A4 (Noise and vibration) stipulated development should have regard to LBC's Noise and Vibration Thresholds. Development will not be permitted where:
- It is likely "*to generate unacceptable noise and vibration impacts*"; or
  - Where it is "*sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses*".
- 7.230 Adopted Local Plan supporting text paragraph 6.97 clarifies that developments should achieve suitable and sufficient internal noise levels based on the latest and relevant guidance. Paragraph 6.98 highlights that common sources of vibration include areas near railways. The Amenity CPG guidance is consistent with these points.
- 7.231 The Amenity CPG further notes that implications of noise and vibration should be considered at the start of the design process to ensure impacts can be minimised. It also explains where noise mitigation proposed is inadequate, but considered necessary use of planning conditions or a legal agreement will be considered. Guidance also

stipulates the Council will apply the Agent of Change principle, therefore proposals for noise sensitive uses near to existing uses/businesses should mitigate anticipated noise and vibration effects.

- 7.232 The Amenity CPG also explains in assessing the impact of vibration, LBC will expect the vibration thresholds to not be exceeded and will consider additional guidance. Additionally, plant, ventilation, air extraction or condition equipment and flues can cause disturbance to residential properties and therefore, the use of long-term maintenance agreements are welcomed ensuring equipment *“maintains acceptable noise levels over its lifetime and the use of timers to limit any unnecessary operation of the equipment”* is welcomed.

#### Planning Assessment

- 7.233 A Noise and Vibration Assessment has been prepared by WSP and submitted in support of this application. A survey has been carried out on the site to quantify the levels of noise and vibration, the results have been used to advise the design team and Applicant on any measures that may be needed to control noise and vibration ingress.
- 7.234 The results of noise levels in habitable rooms have demonstrated that appropriate internal ambient noise levels can be achieved providing that windows with the required sound insulation performance are provided. The assessment also concluded that the building will be ventilated and cooled by mechanical means, so there is no risk of excessive noise during overheating conditions.
- 7.235 A Vibration Assessment has also been undertaken to predict the Vibration Dose Values (‘VDVs’) and re-radiated noise levels likely to occur in the proposed building. VDVs are predicted to result in less than a low probability of adverse comment from future residents. The re-radiated noise levels are likely to exceed the adopted criteria and base isolation specifications have been proposed to meet the design criteria.
- 7.236 As such, it is considered that the proposed development therefore complies with planning policy insofar as it relates to noise and vibration.

#### Landscaping and public realm

##### Policy Context

- 7.237 London Plan Policy D8 sets out the requirements that development proposals should consider with regard to public realm. In particular, proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.
- 7.238 London Plan Policy G1 states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network. Furthermore, Policy G5 explains that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. An Urban Greening Factor (‘UGF’) target score of 0.4 has been set by the Mayor for new, predominately residential developments.
- 7.239 Adopted Local Plan Policy D1 notes that in securing development with high quality design it will be required proposals incorporate high quality landscape design and maximises opportunities for greening (such as through tree planting and soft landscaping). Adopted Local Plan supporting text paragraph 7.22 encourages development of *“green and brown roofs and walls”* and notes hard and soft landscaping design should *“be contextual and consider access requirements”*.
- 7.240 The Air Quality CPG encourages outside space to be screened with exposure minimised through appropriate positioning and orientation, furthermore flues and exhaust vents should not be located in close proximity to recreational areas.
- 7.241 The Design CPG explains LBC expect landscape design and provision of green infrastructure to be *“fully integrated”* into the design of development proposals from the start of the design process, and opportunities to make a positive contribution to greenspace provision should be sought. It is also noted that opportunities for green infrastructure contributing towards delivery of a high quality built environment and sustainable development should be maximised.
- 7.242 The Student Housing CPG explains outdoor amenity space should make *“maximum use of opportunities for greening and soft-landscaping”*. It also explains that where possible, PBSA development should be designed to incorporate new publicly accessible open space, where not possible a financial contribution will be sought – the requirement is 6.75 sqm per resident, where publicly accessible open space is incorporated in a PBSA development it can meet the need for outdoor amenity space.

### Planning Assessment

- 7.243 In accordance with policy, the proposed development will deliver a high-quality landscape strategy which aims to provide high quality external amenity space within the development as well as improve the public realm along Britannia Street and Wicklow Street.
- 7.244 The landscaping strategy has been produced by PAD Landscapes. The landscape proposals and how they accord with policy requirements is summarised below with further detail is provided in the supporting Landscape Design and Access Statement submitted as part of this application.
- 7.245 A total of 196sqm of external amenity space is proposed. At ground floor level a 77sqm courtyard accessible from the internal student amenity space will provide richly planted zones that provide a biodiverse range of species to enliven the student amenity.
- 7.246 At the first and fifth floor roof levels, comprehensive tree planting will introduce biodiversity and visually soften the façade for the neighbouring community and create a refreshing outlook for residents.
- 7.247 At roof level, the 199sqm terrace will maximise zones for amenity to allow for flexible communal areas, offering the opportunity for mixed seating for groups and individuals. The external amenity space is located on the western portion of the roof away from existing residents. The generous space includes extensive greening and is subdivided into more intimate external 'rooms' defined by the façade fins.
- 7.248 The roof level also includes an area of biosolar roof which will have deeper substrate levels and will integrate habitat features; the biosolar roofs also accommodate solar panels. It will be sown or turfed with a native meadow mix to maximise the ecological value, while also contributing positively to the visual amenity.
- 7.249 Sheppard Robson has worked closely with the appointed Accessibility Consultant (Direct Access) to ensure high standards of accessibility and inclusivity have been incorporated into the proposed amenity spaces. Further details are set out in the Accessibility Statement prepared by Direct Access.
- 7.250 In addition to the external amenity spaces, the proposed development also includes public realm improvements. On Britannia Street repaving will be undertaken to increase the pavement width around the main building entrance, to remove the existing vehicular access into the Site along with the planting of three street trees which will create a more attractive pedestrian environment. Similarly on Wicklow Street, there will be an increase the pavement width around community hall entrance and to remove the existing vehicular access into the Site.
- 7.251 In accordance with London Plan Policy G5 the application has considered how to contribute to the greening of the immediate area. An UGF calculation demonstrates that the Site achieves a UGF score of 0.40; meeting the target score which has been set by the Mayor for new residential developments. The extensive greening shall also provide air quality and noise reduction benefits, contribute towards the Healthy Streets initiative, and result in biodiversity benefits (discussed in further detail below).
- 7.252 Overall, the landscaping strategy that supports the proposed development will deliver high quality student amenity space for future residents and improvements to surrounding public realm which will also benefit surrounding existing local residents. As such, the proposed landscaping is considered to fully accord with policy across all levels.

### Arboriculture, Biodiversity and Ecology

#### Policy Context

- 7.253 Chapter 15 of the NPPF outlines the framework for conserving and enhancing the natural environment. Paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity and development proposals should help to improve local environmental conditions.
- 7.254 London Plan Policy G6 explains that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 7.255 London Plan Policy G7 explains that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed. Furthermore policy states the planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- 7.256 At the local level, Policy A3 stipulates that permission will be granted for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or negatively impact the status or



population of priority habitats and species. Developments will be assessed against their ability to realise biodiversity benefits, considering factors such as layout, design and materials used in the built structure and landscaping elements, with the scale of these benefits being proportionate to the size of the proposed development.

- 7.257 Local Plan Policy D1 notes the importance of achieving high-quality design in development, which includes the requirement for high-quality landscape design and highlights the inclusion of tree planting.
- 7.258 The Trees CPG accords with above policy and explains LBC seek opportunities to enhance planting throughout a site as part of the landscaping scheme, outlining specific advice proposals should follow along with management and maintenance measures.
- 7.259 The Air Quality CPG also encourages appropriate planting and trees within developments to improve local air quality.

#### Planning Assessment

- 7.260 The planning application is supported by a Preliminary Ecological Appraisal (PEA) prepared by Greengage. The PEA confirms the Site as being of negligible ecological value with negligible potential to support notable and / or protected species with the exception of low suitability for roosting bats.
- 7.261 A Bat Survey Report was also undertaken by Greengage, no bat activity of any sort was recorded and the survey confirmed the likely absence of roosting bats in the structure and therefore no mitigation actions in relation to roosting bats are required.
- 7.262 More broadly, the PEA noted that no statutory or non-statutory designated sites which stand to be impacted by the proposed development. However, a protected plant species, Jersey cudweed, was recorded on Site. A licence from Natural England would be obtained to allow its collection prior to Site clearance, with seeds from the specimens to be sown on the proposed biodiversity on the Site.
- 7.263 As the Site does not possess more than 25sqm of vegetative habitat, it is exempt from legislative biodiversity net gain requirements. However, the inclusion of ecological enhancements as details will constitute a significant improvement in the ecological value of the Site compared to existing levels.
- 7.264 Overall Greengage conclude that the key enhancement actions are described to enable legislative and policy compliance with the development aiming to achieve net gains in biodiversity for the Site.
- 7.265 In consideration of the above the proposals are considered to accord with national, regional and local policy, insofar as they relate to arboriculture, ecology and biodiversity.

#### Highways and transport

##### Policy Context

- 7.266 Chapter 9 of the NPPF explains that the Government's objective is for significant development to be focused in locations which are or can be made sustainable by maximising opportunities for a genuine choice of public transport and active travel solutions. Paragraph 109 seeks to promote sustainable transport and states that *"transport issues should be considered from the earliest stages of plan-making and development proposals"*.
- 7.267 Paragraph 115 requires development proposals ensure that:
- a) *"sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;;*
  - b) *safe and suitable access to the site can be achieved for all users;*
  - c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
  - d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach."*
- 7.268 Paragraph 116 states that development proposals 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, following mitigation, would be severe, taking into account all reasonable future scenarios"*.
- 7.269 Paragraph 117 confirms applications for development should:
- *"give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport...;*
  - *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*



- *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- *...be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

- 7.270 Paragraph 118 states developments generating “*significant amounts of movements*” should submit a travel plan, “*a vision-led transport statement or transport assessment*” as part of the application to assess and monitor the likely impacts of the proposal.
- 7.271 At the regional level, London Plan Policy T1 explains that 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.
- 7.272 London Plan Policy T2 states that development proposals should promote and demonstrate the application of the Mayor’s Healthy Streets Approach and Policy T4 explains that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 7.273 At the local level, adopted Local Plan Policy A1 explains transport impacts will be considered when assessing developments, including consideration of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans.
- 7.274 Policy T1 explains that LBC “*will promote sustainable transport by prioritising walking, cycling and public transport in the borough*”. In order to do so, LBC will require that walking is promoted in the borough along with improvements to the pedestrian environment through ensuring developments satisfy a range of criteria, including supporting high quality public realm improvement works which would improve the pedestrian environment, ensuring developments are adequately lit and providing high quality footpaths and pavements of suitable width for those who will use them.
- 7.275 Policy T1 also notes the requirement to promote cycling in the borough through a variety of measures. Additionally, to safeguard and promote public transport provision, it will seek to ensure that “*development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information*”. Policy notes that contributions will be sought where demand for bus services generated by the development “*is likely to exceed existing capacity*” and other improvements to public transport where appropriate.
- 7.276 LBC also adopted a Transport CPG providing further information on detailed transport issues.

#### Planning Assessment

- 7.277 In accordance with planning policy requirements, this planning application is supported by a Transport Assessment and Student Travel Plan prepared by Mayer Brown. The Transport Assessment considers the potential transport implications associated with the proposed development.
- 7.278 In accordance with London Plan Policy T6 and reflecting the excellent public transport accessibility of the Site the proposed development will be car-free with the exception of 1no. blue badge parking space.
- 7.279 Two pay-by-hour space for general public use, namely for local service providers, e.g. plumbers will also be provided on Wicklow Street. The provision of these spaces makes use of additional kerb space gained from the removal of the car park accesses on Britannia Street and Wicklow Street and do not detract from the existing on-street parking stock.
- 7.280 Furthermore, as explained in more detail below, the proposed development will be fully compliant with London Plan cycle parking standards.
- 7.281 As outlined in the Transport Assessment, the proposed development has been assessed in accordance with Healthy Streets approach. The assessment concludes that alongside an excellent PTAL rating of 6b, the Site has access to local pedestrian and cycle infrastructure and is located within very close proximity to a large range of local services and amenities. Overall, the Site has excellent accessibility by a variety of sustainable modes of transport.
- 7.282 As part of the Transport Assessment, a trip generation study was undertaken to estimate the trip generation and subsequently the impact on transport networks. The study was focused on the weekday morning and evening peaks; it was determined that should the impact of development traffic on the local road network be considered acceptable during these periods, it would also be acceptable during other, less busy, periods of the week.
- 7.283 The results of the trip generation study demonstrate that the proposed development has potential to generate a low number of trips during the peak hour periods and that the greatest proportion of trips generated by the site will be undertaken on foot. It is therefore considered that the impacts on local public transport services will be negligible.

- 7.284 The assessment also undertook a delivery and servicing trip generation study which concluded that the proposed development would give rise to approximately two two-way delivery vehicle trips on a typical weekday, which is not considered material or significant.
- 7.285 A Student Travel Plan has been submitted as part of this application as required by planning policy and has been prepared in accordance with relevant guidance. The document submitted is a draft Travel Plan, with a full Travel Plan to be supplied to the London Borough of Camden (LBC) post planning approval. The full Travel Plan will include the baseline survey results. The objective of the Travel Plan is to encourage the use of the most sustainable forms of travel by students residing in the proposed development. A Travel Plan and a relevant package of measures would be secured by condition and through a S106 Agreement.
- 7.286 In summary, it can be concluded that the development proposals are in accordance with the principles of sustainable development set out in national, regional and local policy and are therefore fully acceptable in transport planning terms.

#### **Access**

- 7.287 The site is proposed to be car-free, with the public realm designed to accommodate pedestrian and cyclist travel through the site.
- 7.288 Primary pedestrian access will be provided along the building frontage from Britannia Street, with a dedicated entrance lobby and reception provided at ground floor. A separate pedestrian entrance lobby is provided from Wicklow Street for the Community Hall. Access to the ground floor cycle store is also anticipated to be provided from Wicklow Street.
- 7.289 Refuse collection will occur on street via Britannia Street for the PBSA units, with a refuse store provided at ground level with access from Britannia Street.
- 7.290 In summary, each access has been designed to be prominent, safe and suitable for all users and it can be concluded that the development proposals are in accordance with national, regional and local policy.

#### **Car Parking**

- 7.291 London Plan Policy T6 explains that car parking should be restricted in line with levels of existing and future public transport accessibility. The policy explicitly states that residential development within an area of PTAL 6, and student accommodation development, should be car-free.
- 7.292 Policy T6 also explains that appropriate provision should be made for disabled persons parking for Blue Badge holders. Policy T6.1 explains that residential development proposals delivering ten or more units (also applicable to PBSA) must, as a minimum ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset. Disabled persons parking bays should be provided in accordance with the standards set out in Part H of the policy.
- 7.293 Adopted Local Plan Policy T2 states LBC will limit the availability of parking and require all new developments in the borough to be car-free.
- 7.294 The proposed development will be car-free, with the exception of one on-street accessible space. Two pay-by-hour space for general public use, namely for local service providers, e.g. plumbers will also be provided on Wicklow Street. The provision of these spaces makes use of additional kerb space gained from the removal of the car park accesses on Britannia Street and Wicklow Street and do not detract from the existing on-street parking stock.
- 7.295 The pay-by-hour spaces were provided in response to public consultation feedback. Significant concern was raised by local residents of Britannia Street and Wicklow Street surrounding the loss of the existing 30-space car park, which is well used by local service providers such as plumbers and electricians. The provision of two pay-by-hour spaces therefore allow local service providers to still serve the area, with a net reduction of 27 spaces still provided by the scheme as a whole.
- 7.296 Occupants that are Blue Badge holders would be able to utilise any on-street blue badge, resident permit holder, shared use or pay and display parking bays that are located within the local area.
- 7.297 Overall, it is considered that the proposed car parking provision is fully justified in the context of the Site constraints and planning policy and guidance.

#### **Cycle Parking**

- 7.298 Paragraph 117 of the NPPF provides support to the promotion of cycling, outlining that development proposals should encourage sustainable modes of transport including cycling, and should therefore provide sufficient cycle infrastructure and facilities.
- 7.299 London Plan Policy T5 explains that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Proposals will be expected to provide appropriate levels of

cycle parking, which is fit-for-purpose, secure and well located in accordance with the London Cycling Design Standards. The policy sets out that developments should provide cycle parking at least in accordance with the minimum standards set out in the Plan.

- 7.300 Though at the local level Camden Planning guidance notes an additional 20% of spaces above London Plan standards for cycle parking; as justified in the Transport Assessment, evidence does not support a higher parking standard for purpose-built student accommodation than the London Plan standard of 0.75 long stay spaces per bedroom and 1 short stay space per 40 bedrooms.
- 7.301 As set out in the Transport Assessment, Britannia Street links to a number of regional and local cycle networks. The Site specifically is located in close proximity to a number of cycle networks including the C6, C27. Furthermore, a number of Santander Cycle Hire docking stations are in close proximity to the site, including a docking station on St Chad's Street (195m away) and one on Cromer Street (approximately 200m away).
- 7.302 The proposed development will provide a dedicated cycle store for the PBSA units along the southern frontage of the Site with Wicklow Street. Cycle storage has been provided for 93no. cycles, comprising of 74no. as vertical spaces, 15no. Brompton stands and 4no. enlarged spaces. 4no. additional visitor cycle parking spaces have been provided in the form of Sheffield Stands fronting onto Britannia Street.
- 7.303 London Cycling Design Guidance has also been considered in the schemes design development.
- 7.304 As such, the proposed cycle parking provision is in accordance with London Plan and Local Plan requirements.

**PBSA Move in / Move out**

- 7.305 The Transport Assessment also considered the move in / move out strategy for the start / end of each academic year. In summary, students who have been allocated a room will be invited to select a preferred time slot from 30-minute slots on set days and these will be allocated individually. The move-in period will be staggered over 2no. weekends and time slot management will be organised by site management a physical spread through the buildings at each time to reduce pressure on staircases in addition to minimising impact to the surrounding road network at these times.
- 7.306 Students will be provided with details of local public transport and loading arrangements and it will be required that students advise on their intended transport methods ahead of move in day.
- 7.307 It is anticipated that students arriving by vehicle will utilise pay and display parking spaces available on Britannia Street. It is likely that the majority who chose to arrive by vehicle will utilise taxi's. Residents will be asked to complete their move and then relocate their vehicles away from the site within 30 minutes of arrival. Once a resident has completed moving all possessions from their vehicle to the property (or vice versa) or the 30 minute limit has been reached, they will be expected to move their vehicle away from Britannia Street.
- 7.308 It is expected students moving out will likely occur over a longer period, students will be advised of the expected move out procedures and dates to do so prior to the end of their tenancy. Where necessary departure slots for vehicles will be allocated.
- 7.309 This application is also supported by a Draft Student Management Plan ('SMP') prepared by Fresh. The Draft SMP provides a detailed move in / move out strategy for the start/end of each academic year and provides further detail tot the proposed check in arrangements to ensure that they are highly efficient.

**Refuse and Servicing**

Policy Context

- 7.310 Paragraph 117 of the NPPF indicates that applications for development should ensure that "*efficient delivery of goods, and access by service and emergency vehicles*".
- 7.311 London Plan Policy T7 explains that development proposals should facilitate safe, clean, and efficient deliveries and servicing. To achieve this, proposals should provide adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Policy T7 (G) states that Delivery and Servicing Plans will be required and should be developed in accordance with TfL guidance and in a way which reflects the scale and complexities of developments.

Planning Assessment

- 7.312 This planning application is supported by a Delivery and Servicing Management Plan ('DSMP') prepared by Mayer Brown.
- 7.313 As outlined in the DSMP, vehicular access for deliveries to the site shall take place from Britannia Street on from either the pay and display bays or by kerbside.

- 7.314 Refuse collection is proposed to occur on street adjacent to the development, from Britannia Street and managed by the on-site management team. The waste operatives will be able to access the bin storage area on the ground floor with a direct transfer from storage to the waste collection vehicle. The drag distance is expected to be minimal.
- 7.315 The DSMP explains how the servicing of the development can be carried out efficiently, without creating any negative impacts upon the local highway network and aims to oversee deliveries achieved without any conflict between vehicles or pedestrian. The DSMP is set out to guarantee that both servicing and waste management is dealt with effectively and can be updated to meet the needs of new servicing plans or waste management proposals, as necessary.
- 7.316 Matters relating to servicing and delivery during the construction phase of the development are discussed below in the construction and environmental management section.
- 7.317 It is concluded that the proposed servicing, deliveries and refuse strategy comply with policy requirements across all levels.

## Energy

### Policy Context

- 7.318 National, strategic and local planning policy aims to support a low carbon future and to increase the use and supply of renewable and low carbon energy.
- 7.319 Paragraph 161 of the NPPF states that development proposals should support the transition to a net zero by 2050, encourage the reuse of existing resources, and support renewable and low carbon energy and associated infrastructure.
- 7.320 Paragraph 164 of the NPPF states that development should help to reduce greenhouse gas emissions through its location, orientation, and design. Paragraph 166 further states that in determining planning applications, local planning authorities should expect new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 7.321 At the strategic level, London Plan Policy SI2 seeks to ensure that new major development be net zero-carbon through the reduction in greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 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 onsite;
  - 4) Be seen: monitor, verify and report on energy performance.
- 7.322 Policy SI2 (B) explains that major development proposals should include a detailed Energy Strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
- 7.323 Policy SI2 (C) explains that a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should aim to achieve 10 per cent.
- 7.324 Policy SI4 explains that 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.
- 7.325 At the local level, the adopted Local Plan supporting text paragraph 6.99 explains that air conditioning will only be permitted if a clear need for it is demonstrated after considering alternative measures. Additionally supporting text paragraph 8.8 states, developments involving five or more dwellings or over 500 sqm of gross internal floorspace must provide an energy statement showing adherence to the energy hierarchy to maximize CO2 reduction. New residential developments are also required to achieve a 19% reduction in CO2 emissions compared to Part L 2013 Building Regulations, alongside any renewable energy requirements. These commitments can be outlined in an energy or sustainability statement.
- 7.326 Adopted Local Plan Policy CC1 explains through requiring developments to minimise the effects of climate change and in meeting environmental standards LBC will:
- *“...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;*
  - *support and encourage sensitive energy efficiency improvements to existing buildings...”.*

- 7.327 Policy CC1 requires that major developments assess the feasibility of connecting to an existing decentralised energy network or, if that is not possible, establishing a new network. It also stipulates that major developments must install appropriate monitoring equipment.
- 7.328 Supporting text paragraphs 8.9-11 of the Adopted Local Plan elaborates that proposals should demonstrate how passive design measures—such as the development’s orientation, form, mass, and window sizes and positions—have been considered to minimise energy demand. They must also demonstrate compliance with, and where possible exceed, the minimum energy efficiency requirements under building regulations. Additionally, proposals should demonstrate how energy will be efficiently supplied through decentralised energy systems. Developments comprising five or more dwellings or over 500 sqm of gross internal floorspace are expected to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation, including site-related decentralised renewables, unless it is shown that this is not feasible.
- 7.329 Supporting text paragraph 8.12 clarifies where it can be demonstrated the required London Plan reductions in carbon dioxide emissions cannot be met on site, a financial contribution will be required to be agreed to a borough wide programme to provide for “*local low carbon projects*”.
- 7.330 Supporting text paragraph 8.85 explains that new developments are expected to focus on energy efficiency and efficient energy supply systems.
- 7.331 Adopted Local Plan Policy CC2 emphasises the need for development to be resilient to climate change. It highlights the importance for development to adopt appropriate climate change adaptation strategies, including measures to mitigate urban and dwelling overheating by application of the cooling hierarchy.
- 7.332 The Air Quality CPG explains energy efficient building design can minimise air pollution as a result of the use of gas boilers. Furthermore, guidance explains gas boilers in new development are required to achieve a NO<sub>x</sub> emissions of <40mgNO<sub>x</sub>/kwh and an energy efficiency rating <90%.

Planning Assessment

- 7.333 In accordance with London Plan Policy SI2 this application is accompanied by an Energy Statement prepared by Ensphere. The Energy Statement outlines how energy efficiency, low carbon and renewable technologies have been considered as part of the energy strategy. When implemented the scheme will provide an efficient and low carbon development.
- 7.334 The full details are provided in proposed Energy Statement, with a summary of how the proposed development will meet the requirements of the energy hierarchy are provided below.

**Demand Reduction (Be Lean)**

- 7.335 The proposed approach seeks to accommodate the approach of efficient design first on the basis that it is preferable to reduce carbon emissions by reducing energy demand.
- 7.336 It is proposed to achieve a reduction in emissions through efficiency measures in excess of the 15% target, as presented in London Plan Policy SI 2 and supported by Policy CC1 of the Local Plan. Regulated Carbon Dioxide savings from energy demand reduction will equate to 18% in the proposed development, this is principally achieved through the selection of highly efficient fabric, lighting, and control systems.

**Use Energy More Efficiently (Be Clean)**

- 7.337 So called “Clean” technologies are not proposed on site.
- 7.338 Combined Heat and Power (‘CHP’) no longer provides a low carbon option when considered in the context of a decarbonising electricity grid. Whilst the site has a heating demand, it is modest and likely subject to daily / weekly / yearly fluctuation due to occupancy patterns. At this scale, it is generally not economic to install CHP as smaller CHPs tend to have lower electrical efficiencies and therefore higher carbon emissions. CHP also tends to emit higher levels of NO<sub>x</sub> than other heating systems; potentially adversely impacting local air quality.
- 7.339 A centralised CHP plant would create complex managerial arrangements and the administrative burden of managing CHP electricity sales to grid when the power is not required on site; combined with the relatively low unit price for small volumes of exported CHP electricity can create incentives for the CHP to be installed but not operated. CHP is therefore not proposed.
- 7.340 Given CHP is not proposed for the development and there are no current or proposed DENs in the vicinity of the Site, the building will be future proofed to facilitate connection subject to the supply of heat with a lower environmental impact than alternative on-site solutions. Proposals include a communal heat network with provision for a single point of connection, enabling the development to connect to an area-wide district heating network in the future. This strategy reduces the cost and complexity of retrofitting the site for such a connection at a later stage.



- 7.341 While expanding the heat network beyond the site boundaries is not proposed at this stage due to site constraints such as available plant space not allowing for surplus energy, limiting the feasibility of establishing a broader area-wide network at this stage, the design prioritises flexibility and long-term compatibility with broader energy systems.
- 7.342 Furthermore, there is no District Energy Network ('DEN') in the immediate vicinity of the Site, through correspondence with LBC it was confirmed that the networks are not considered in close enough proximity to the site to facilitate connection as it would be uneconomic given the pipework costs and heat load.
- 7.343 In the absence of an existing DEN in close proximity to the Site and with the heat source likely higher carbon than alternatives, it is not proposed to accommodate DEN as part of the energy strategy. However, the Site will be future proofed to facilitate connection, subject to the supply of heat with a lower environmental impact than alternative on-site solutions.

#### **Low Carbon Renewable Technology Review (Be Green)**

- 7.344 It is proposed to apply Air Source Heat Pumps ('ASHPs') to the space and hot water heating. A significant extent of Photovoltaic ('PV') systems are proposed at roof level to ensure compliance with planning policy targets.
- 7.345 Regulated Carbon Dioxide savings from renewable energy reduction will equate to 18% in the proposed development.

#### **Monitor, Verify & Report (Be Seen)**

- 7.346 The applicant is committed to 'Be Seen' energy monitoring, which requires the reporting of energy performance data to the GLA as a scheme is planned, built out and in use – further detail has been provided in the associated Energy Statement submitted.
- 7.347 The Applicant will undertake a programme of aftercare support as part of its handover process, which will also align with the BREEAM Man05 credit requirements.
- 7.348 By adhering to the 'Be Seen' monitoring and reporting approach, the building's energy performance will be effectively tracked and aligned with the initial design intent, facilitating ongoing improvements and optimising energy efficiency in accordance with the London Plan and Local Policy.

#### **Overheating**

- 7.349 A Thermal Comfort Analysis has been prepared by Ensphere and submitted in support of this application. The main purpose of the report has been to investigate how the proposed development performs against the criteria set out in CIBSE TM59:2017, the Approved Document Part O (2021), and CIBSE TM52:2013. Consideration has also been given to the methodology presented in CIBSE AM11 Building Energy and Environmental Modelling.
- 7.350 The report demonstrates the cooling hierarchy Policy SI 4 of the London Plan and as per Greater London Authority's Energy Assessment Guidance (June 2022) has been followed. Passive design measures have been prioritised and optimised, incorporating appropriate site orientation, optimal fenestration and shading elements, high-performance building fabric, and thermal mass factors.
- 7.351 To address constraints raised through the associated Noise and Vibration Survey submitted as part of this application, the proposed design incorporates fixed window panels. However, as part of the thermal comfort assessment, two sets of simulations were conducted: one without noise or security restrictions and another with the noise restrictions recommended by WSP applied, to evaluate the efficiency of the passive design measures. As a minimum requirement to achieve compliance an overheating mitigation strategy was identified and applied to show that all occupied spaces pass the relevant CIBSE criteria under the current weather normal conditions (London\_LWC\_DSY1\_2020).
- 7.352 To achieve compliance the following strategies are proposed to mitigate the overheating risks:
- Maximising the passive design measures
    - Adequate orientation of the building on site
    - Good fabric thermal properties, optimum fenestration ratio and G-Value of 0.4
    - Implementation of shading devices as architectural elements: projected architectural grid and vertical fins to the windows.
    - Energy efficient design.
    - Thermal mass factor
  - Mechanical Ventilation of 3ACH to the communal corridors within the residential spaces.

- Comfort cooling for all residential spaces (studios, living/kitchen areas) and the amenity spaces (amenity spaces, reception, office/study areas, laundry).

- 7.353 When assessed under more extreme weather scenarios with harsh summer types, comfort cooling is required in all spaces. And with the expectation of climate change, warmer weather will likely lead to increased temperatures being experienced within the building, and this scenario will also require comfort cooling in the majority of spaces.
- 7.354 Overall, it is concluded that the proposed development will perform at an acceptable level in terms of overheating. Therefore the proposed development is considered to be in accordance with London Plan Policy SI4 and Local Plan Policy CC2.

### Conclusion

- 7.355 The development will aim to surpass the Council target for an on-site carbon saving of >35% relative to Part L 2021, targeting >15% from energy efficient measures. Indicative regulated carbon stages at each stage of the Energy Hierarchy are summarised within the Energy Statement submitted, total cumulative savings equating to 36%.
- 7.356 Residual emissions will be offset with a Carbon Offset payment. A copy of the GLA Carbon Emission Reporting Spreadsheet is appended to the Energy Statement submitted confirming the savings at each stage of the Energy Hierarchy and outlining the Carbon Offset payment.
- 7.357 Overall, the proposed energy strategy is considered consistent with the National Planning Policy Framework, London Plan and policies of the Council. When implemented, the scheme will provide an efficient and low carbon development.

### Sustainability

- 7.358 London Plan Policy SI2 (F) states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 7.359 London Plan Policy SI5 explains that in order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner. Development proposals should incorporate measures to achieve lower water consumption rates and achieve at least the BREEAM excellent standard for the 'Wat 01' water category. Policy also states development proposals should:
- *“seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided; and*
  - *take action to minimise the potential for misconnections between foul and surface water networks”.*
- 7.360 Policy SI7 explains developments should seek to conserving resources, reducing waste, and support a circular economy. It specifies that development should incorporate adequate, flexible, and easily accessible storage and collection systems designed to support the separate collection of dry recyclables such as card, paper, mixed plastics, metals, glass, and food waste. Additionally, developments that are referable to the Mayor should be supported by a Circular Economy Statement.
- 7.361 Adopted Local Plan Policy CC1 requires development to minimise effects of climate change and encourages them to meet *“the highest feasible environmental standards that are financially viable during construction and occupation”*.
- 7.362 Adopted Local Plan Policy CC1 emphasises the need for developments to minimise the effects of climate change and encourages achieving the highest feasible environmental standards that are financially viable throughout both construction and occupation. The Council will:
- *“promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;*
  - *require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;...*
  - *require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and*
  - *expect all developments to optimise resource efficiency”.*
- 7.363 Supporting text paragraph 8.19 notes it will be expected for the service life of buildings and potential future uses to be considered to optimise efficiency. Where appropriate, buildings should be designed with flexibility to accommodate future alternative uses, to avoid the requirement for future demolition.

- 7.364 Supporting text paragraph 8.20 states that the Energy and Sustainability Statement should include an assessment of the carbon emissions associated with the development.
- 7.365 Adopted Local Plan Policy CC2 requires development to be resilient to climate change. It notes development should “adopt appropriate climate change adaptation measures such as:
- the protection of existing green spaces and promoting new appropriate green infrastructure; ...
  - incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and
  - measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy”.
- 7.366 Policy CC3 requires development to incorporate water efficiency measures. Supporting text paragraph 8.55 clarifies that residential developments will be expected to meet the requirement of 110 litres per person per day (including 5 litres for external water use).
- 7.367 Policy mandates that a Sustainability Statement be provided for applications involving five or more residential units or at least 500 square meters of additional floorspace. Supporting text paragraph 8.34 acknowledges that implementing certain adaptation measures may be challenging for some conservation areas and encourages early engagement with the LBC to explore innovative solutions.
- 7.368 The Design CPG specifies that plant and machinery, especially on roofs, should not obstruct the installation of required onsite renewable energy facilities as part of the development. It also highlights the need to consider the potential for future renewable energy installations.
- 7.369 The Student Housing CPG further emphasises the importance for sustainable measures to be incorporated in development and further guidance on standards is provided in the Energy efficiency and adaptable CPG.

#### **Planning Assessment**

- 7.370 This application is supported by a Sustainability Statement prepared by Ensphere. The statement details how the proposed development contributes to sustainable development in the context of the strategic, design and construction considerations.
- 7.371 The report outlines the range of sustainable design and construction features proposed, including:
- Air Source Heat Pumps for space and hot water heating.
  - An extent of PV will be located at roof level.
  - Highly thermally efficient building fabric.
  - Highly efficient lighting.
  - Water saving sanitary fittings and appliances to deliver a water efficient development and achieve overall water consumption levels <105 litres / person / day.
  - The use of materials with a low lifecycle environmental impact and embodied energy.
  - Consideration of the principles of Secured by Design.
  - Efficient construction and operational waste management.
  - Installation of green roofs, with a 10% target for biodiversity net gain and 0.4 urban greening factor target.
  - A BREEAM “Excellent” rating will be targeted for the student accommodation.
  - Whilst the units will have the option of natural ventilation, mechanical ventilation (with heat recovery) will also be incorporated into certain areas in order to preserve heat during colder months.
- 7.372 In accordance with London Plan Policy SI5, the Sustainability Statement outlines that the development would ensure the efficient use of water, including making the most of natural systems both within and around buildings. Detailed measures proposed have been outlined within the accompanying report.
- 7.373 In accordance with London Plan Policy SI2 (F) this application is supported by a Whole Life-Cycle Carbon Assessment prepared by Ensphere. The assessment has reviewed whole life carbon emissions over a 60-year period, in line with the recommended RICS approach. This identified total WLC emissions of circa 9,308,918 kgCO<sub>2</sub>e (~2,013 kgCO<sub>2</sub>e/m<sup>2</sup>) under the non-decarbonised scenario. Embodied carbon emissions have been estimated at ~616 kgCO<sub>2</sub>e/m<sup>2</sup> (below the 850 kgCO<sub>2</sub>e/m<sup>2</sup> threshold given by GLA for residential developments).
- 7.374 In accordance with London Plan Policy SI7 this application is also supported by a Circular Economy Statement prepared by Ensphere. The application of Circular Economy philosophy to the built environment is complex with issues overlapping and trade-offs to consider. Nevertheless, a balanced approach has been sought in line with the

overarching commitments to sustainable design and construction. The aspiration to implement measures that go beyond standard practice will continue to be considered as the design progresses through regular workshops with the design team and during the construction process.

- 7.375 As such a range of commitments are proposed and these will be managed and recorded through a range of documentation. Key commitments include:
- Design for adaptability and flexibility, using materials that have high durability for longevity.
  - Diversion of demolition and construction waste from landfill by converting elements and materials for alternative use.
  - Efficient construction and operational waste management via accessible, dedicated areas for segregated.
- 7.376 According with requirements set out in LBC's adopted Local Plan supporting text paragraph 8.19, the proposed building has been designed to be adaptable for future uses. As detailed within the Design and Access Statement prepared by Sheppard Robson, the proposed development has been designed to be adaptable for alternative uses for Elderly Care, Co-Living or Hotel uses.
- 7.377 On the basis of the above, it has been demonstrated that the development achieves the highest standards of sustainable design and construction and accords with national, regional and local policy.

## Flooding and Drainage

### Policy Context

- 7.378 Chapter 14 of the NPPF sets out the sequential approach to planning new development and flood risk. The NPPF seeks to guide development to areas of low flood risk, ideally to Flood Zone 1. Paragraph 181 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Further, paragraph 182 sets out that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 7.379 London Plan Policy S112 explains that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 7.380 London Plan Policy S113 explains 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. There should also be a preference for green over grey features, in line with the drainage hierarchy. Policy S113 (D) explains that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- 7.381 Local Plan Policy CC2 requires development to be resilient to climate change. It notes development should "*adopt appropriate climate change adaptation measures such as:*
- *the protection of existing green spaces and promoting new appropriate green infrastructure;*
  - *not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;*
  - *incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and*
  - *measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy*".
- 7.382 Local Plan Policy CC3 aims to ensure that developments do not contribute to increasing flood risk and seeks to reduce the risk of flooding wherever possible. Development will be required to:
- *"incorporate water efficiency measures;*
  - *avoid harm to the water environment and improve water quality;*
  - *consider the impact of development in areas at risk of flooding (including drainage);*
  - *incorporate flood resilient measures in areas prone to flooding;*
  - *utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and*
  - *not locate vulnerable development in flood-prone areas*".
- 7.383 Local Plan supporting text paragraph 8.66 also states that if greenfield run off rates cannot be met, the run off should be as close as possible to align with policy requirements. Specifically, major developments are required to constrain runoff volumes for a 1 in 100 year, 6-hour rainfall event, where feasible.

- 7.384 Supporting text paragraph 8.69 highlights that proposals should demonstrate how they will mitigate potential flooding risks to other properties. When assessing the suitability of SuDS, factors such as the vulnerability and significance of local ecological resources, including water quality and biodiversity, should be taken into account.

### **Planning Assessment**

- 7.385 In accordance with the NPPF, London Plan and Local Plan policies, a Flood Risk Assessment ('FRA') and Drainage Strategy ('DS') has been undertaken by WSP and is submitted in support of this planning application.
- 7.386 The FRA investigates flood risk in the area and outlines mitigation measures proposed to ensure the sustainable and safe development of the site from a flood risk and surface water management perspective in line with the requirements of the National Planning Policy Framework (NPPF), and the Environment Agency's (EA) Standing Advice.
- 7.387 The FRA confirms the Site is in Flood Zone 1 and is at low risk of flooding. Based on this, the sequential test is satisfied, and the exception test is not required.
- 7.388 The FRA also explains the Site is classified as having a 'low' probability of tidal and fluvial flooding. Other potential sources of flooding have been investigated however no significant sources of flooding have been identified.
- 7.389 The DS has been developed to manage surface water runoff within the proposed development, considering the impact of climate change. The proposed drainage strategy includes an internal above ground surface water attenuation tank, with the possibility of blue roofs being incorporated into terrace and roof build-ups at following design stages. The existing combined connection to the Thames Water will be reused, subject to a CCTV survey and confirmation from Thames Water.
- 7.390 As detailed within the accompanying report restricting to rates as low as the Qbar greenfield rates would result in an extremely small flow control, prone to blockages and failure. As a result a restricted discharge rate of 1.36 L/s (1 in 100 year Green field run-off rate) is proposed which would result in a 42mm orifice hydrobrake. An above ground tank on the ground floor of the building will attenuate the surface water from the building footprint. This will discharge via the existing manhole and sewer connection on site, subject to a CCTV survey.
- 7.391 The proposed SuDS provides a surface water management solution that reduces the surface water run off that leaves the Site and shows that the proposed development does not result in an increase to the risk of flooding on or off site.
- 7.392 Green roofs and communal landscaping are provided on Site for both source control for low rainfall events and will take the first 5mm of rainfall as well as opportunity for an element of bioretention, treatment, biodiversity and amenity value. They can also provide an opportunity for evapotranspiration.
- 7.393 In addition to reduction in water run-off, the proposed SuDS will provide multiple benefits including enhanced biodiversity, urban greening, amenity and recreation as explained in detail in the above landscaping and public realm section of this statement.
- 7.394 On the basis of the minimal risk of flooding and proposed SuDS, it is considered that the proposed development accords with flooding and drainage policy requirements across all levels.

## **Contamination and ground conditions**

### **Policy Context**

- 7.395 Paragraph 196 of the NPPF states that new development should be suitable for its location taking account of ground conditions and any risks arising from instability and contamination. Adequate site investigation information, prepared by a competent person, should be available to inform these assessments.
- 7.396 Local Plan Policy A1 notes when considering impact of development, contaminated land will be a factor of consideration. Supporting Text Paragraph 6.25 further states that examples of sites which may require assessments include those previously used for "*industrial processes*".
- 7.397 The Amenity CPG states that, in principle, LBC supports the redevelopment of contaminated sites where the contamination can be successfully addressed, and future uses can be safely carried out.

### **Planning Assessment**

- 7.398 In accordance with NPPF and Adopted Local Plan policy and associated planning guidance, this application is supported by a Preliminary Risk Assessment prepared by WSP.



- 7.399 The Assessment aims to support the planning application for the proposed development by developing a preliminary Conceptual Site Model (CSM) to identify potential contamination risks and evaluating likely contaminated land exposure pathways and their potential significance to receptors. The desk study was supplemented by a Site walkover.
- 7.400 The Assessment concludes the following:
- There is a risk to human health ranging from Low to Moderate dependant on land use and receptor. Risks are low in areas of proposed hardstanding;
  - Risks to construction works from asbestos during demolition and redevelopment is considered to be Moderate. However, these risks to workers should be managed through health and safety protocols under protocols under the Control of Asbestos Regulations (CAR) 2012 and Construction (Design and Management) Regulations 2015;
  - There is a Low to Moderate risk to human health from ground gases derived from on-site sources;
  - There is a Low to Moderate risk to building structures from on-site sources;
  - There is a Low risk to future site users and construction workers from off-site sources and the risk to future site users from potential ground gas ingress is considered to be Low to Moderate; and
  - There is a Low to Moderate risk to building structures from off-site sources.
- 7.401 The following recommendations were made based upon the assessment:
- It is recommended an intrusive investigation should be undertaken to allow the assessment of identified plausible contaminant linkages and if the remedial measures may be required. Geotechnical testing should also be undertaken to inform foundation design;
  - The report also identified a high unexploded ordnance ('UXO') risk to site, and it is recommended that a Detailed UXO desk study is commissioned for the site to zone the potential risk of encountering UXO during the site investigation;
  - Furthermore, given the proposed development may include piling, a piling risk assessment should be undertaken to assess the risks to the deeper underlying aquifers;
  - Due to the location of the Metropolitan line tunnel running beneath the site, a condition survey of the adjacent/on-site Transport for London (TFL) assets and existing buried services within or in the vicinity of the site may be required to confirm the position and current condition of these assets; and
  - Once a masterplan has been confirmed or should development plans change or are altered, an update of the assessments undertaken within this report are likely to be required.
- 7.402 On the basis of the Preliminary Risk Assessment findings, it is concluded that those recommendations set out within the assessment can suitably be addressed by way of appropriately worded planning conditions.

## Fire Safety

### Policy Context

- 7.403 In accordance with London Plan Policy D12, all major development proposals, in the interests of fire safety and to ensure the safety of all building uses, must achieve the highest standards of fire safety. Furthermore, all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

### Planning Assessment

- 7.404 In accordance with policy, a Fire Statement and Fire Safety Strategy Report have been prepared by Helios and are submitted in support of this planning application. Helios have reviewed the proposed development against the relevant design guides, and in relation to fire safety for this development category and have confirmed how the design achieves an elevated standard of fire safety when reviewed against all current Statutory Guidance and Government Published Guidance.
- 7.405 Additionally, requirements listed within the Draft Fire Safety LPG Form 1 and Form 3 have been addressed and submitted as part of this application.

- 7.406 As such, the proposed development achieves the highest standards of fire safety and therefore complies with the requirements of London Plan Policy D12.

## Construction and Environmental Management

### Policy Context

- 7.407 London Plan Policy T7 (G) requires Construction Logistics Plans to be developed in accordance with TfL guidance in a way which reflects the scale and complexities of developments. During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all
- 7.408 Local Plan Policy A1 explains that when assessing amenity impacts, the impacts of the construction phase, including the use of Construction Management Plans, will be taken into account. Supporting text paragraph 6.13 clarifies that Construction Management Plans may be required for major developments. These plans must address the potential impacts of the construction phase and outline measures to mitigate any negative effects. Supporting text paragraph 6.17 adds that the level of detail should be proportionate to the scale and/or complexity of the development, helping developers provide the necessary information. The Amenity CPG also reinforces this approach.
- 7.409 Local Plan supporting text paragraph 6.23 outlines the expectation for developers and contractors to adhere to the Greater London Authority and London Councils' Best Practice Guidance: The control of dust and emissions from construction and demolition. These measures should be detailed in the Construction Management Plan.
- 7.410 Local Plan Policy A3 requires that the construction phase of development be planned to avoid disturbances to habitats, species, and ecologically sensitive areas, as well as the spread of invasive species. Policy A4 emphasises the need to minimise impacts on local amenity from deliveries, as well as from the demolition and construction phases of development.
- 7.411 Local Plan supporting text paragraph 8.84 states that developments involving significant construction must assess the impacts following the Institute of Air Quality Management Dust Guidance and comply with the Mayor's SPD on 'The control of dust and emissions during construction and demolition'. Mitigation measures appropriate to the risk should be included in the Construction Management Plan. Additionally, it is further noted that high-risk sites must include real-time construction dust monitoring, and medium-risk sites should incorporate monitoring as necessary, in line with the Mayor's SPD.
- 7.412 Adopted Local Plan supporting text paragraph 8.97 notes it is sought *"to secure the reuse of construction waste on development sites to reduce resource use and the need to transport materials"*.

### Planning Assessment

- 7.413 To ensure high levels of environmental management, this planning application has thoroughly assessed the impacts of the construction logistics and management of the proposed development.
- 7.414 To ensure that the potential environmental impacts during the demolition and construction phase are minimised this planning application is supported by reports which provide a thorough overview of appropriate environmental management controls.
- 7.415 A Construction / Demolition Management Plan ('CDMP'), utilising the template provided by LBC, has been completed by Mayer Brown. The Plan aims to assist with minimising construction impacts, and relates to all construction activity both on and off site that impacts on the wider environment.
- 7.416 The CDMP is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses. Relevant mitigation and monitoring measures have been detailed where appropriate within this and relevant technical reports.
- 7.417 In consideration of the above, it is concluded that the proposed Construction / Demolition Management Plan complies with policy requirements across all levels for this stage in the development process

## 8. Planning Obligations

### Section 106 Agreement

- 8.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, LPA's have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land, among other things.
- 8.2 In accordance with Regulation 122 of the CIL Regulations, and as stated at Paragraph 58 of the NPPF, planning obligations must only be sought where they meet all of the following tests:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development.
- 8.3 Paragraph 56 of the NPPF explains that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 8.4 Paragraph 57 states that, "*planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects*". It continues, "*agreeing conditions early is beneficial to all parties involved in the process and can speed up decision-making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.*"
- 8.5 Policy DM1 of Camden's adopted Local Plan states the Council will utilise planning obligations and other suitable mechanisms where appropriate to support sustainable development; secure the infrastructure, facilities and services to meet needs generated by development; and mitigate the impact of development.
- 8.6 The LBC Developer Contributions CPG and Student Housing CPG sets out the approach that the LBC will take to securing obligations and the areas where obligations may be sought.
- 8.7 The Applicant will enter into a Section 106 Agreement with the LBC to secure the reasonable and necessary planning obligations associated with the development in accordance with Regulation 122 of the CIL Regulations, the Local Plan and the Developer Contributions CPG.
- 8.8 Planning obligations will be secured to mitigate impacts arising from the scheme, potentially including provisions associated with the following:
- Secure Student Accommodation;
  - Wheelchair Student Accommodation;
  - Blue badge parking;
  - Car Free Development;
  - Travel Plan and monitoring contribution;
  - S278 Agreement for public realm improvements and removal of existing vehicular site access points.
  - Employment, skills and training; and
  - Carbon offset payment.

### Community Infrastructure Levy

- 8.9 The LBC CIL Charging Schedule came into effect on 30<sup>th</sup> October 2020. The following LBC CIL rates are relevant to the proposed development per sqm (GIA):
- Student accommodation: £225
  - Community Meeting Spaces: £0
- 8.10 The proposed development will also be liable for Mayoral CIL (MCIL2). MCIL2 in LBC is charged at £80 per sqm.
- 8.11 It is estimated that the proposed development would contribute circa £1m towards Local CIL and circa £370,000 towards MCIL. These figures are estimates only and subject to change based on indexation.

## 9. Regeneration Statement

- 9.1 In accordance with the NPPF, planning benefits should be weighed in the balance as part of the determination of this planning application.
- 9.2 This section sets out the planning benefits associated with the proposed development under the headings of regeneration, heritage and economic benefits.
- 9.3 The proposed development will transform the current vacant brownfield Site to deliver 121 student beds and 64sqm (GIA) of community space alongside public realm improvements along Britannia Street and Wicklow Street.
- 9.4 The development does not form part of a specific regeneration strategy / initiative. However it will deliver numerous regenerative benefits as detailed in this section. The proposed scheme will also sit alongside other nearby developments such as the Royal National Throat, Nose, and Ear Hospital site redevelopment which collectively will deliver significant improvements to the area.
- 9.5 Each of the planning benefits set out below is considered to be of public benefit. As the list identifies, overall the benefits arising from the proposed development are significant.

### Regeneration Benefits (significant weight)

- 9.6 The proposed development will deliver the following regeneration benefits, which in accordance with NPPF paragraph 125 C should be given substantial weight:
- Development of the currently vacant Site, which in its current form negatively impacts the Conservation Area, streetscape, townscape and public realm along Britannia Street and Wicklow Street. The development of the Site will regenerate and optimise an underutilised and prominent site in the area.
  - The proposed development will comprise a new high-quality, purpose-built building which will enhance the setting of the Conservation Area and adjacent listed buildings as well as contribute to the renewal of Kings Cross more widely.
  - The provision of enhanced public realm along Britannia Street and Wicklow through improvements to pavements and the addition of street trees on Britannia Street will alongside the redevelopment of the Site deliver a significantly enhanced streetscape for occupants of the new development and existing local residents.
  - The provision active frontages along Britannia Street and Wicklow Street will activate street frontages, provide passive surveillance through the daytime and evening periods thus improving the pedestrian experience and perception of safety.
  - A new high-quality flexible community space will be provided for use by local residents which will help integrate the development into the wider community.
  - The PBSA will assist in addressing the significant demand for this type of accommodation locally and regionally. As demonstrated within this application, even with the proposed development there is a significant under supply of PBSA locally, which emphasises the importance of the current proposals in trying to match supply and demand. Helping to meet this need will ensure that the economic benefits associated with students and visitors are captured within the local area.
  - The proposed development has been inclusively designed and provides both wheelchair accessible and wheelchair adaptable rooms.
  - The proposed affordable housing financial contribution will fund the delivery of affordable C3 housing Camden.
  - The erection of high-quality PBSA which meets high standards of design and construction, as well as providing the best possible living conditions for students will attract and retain students and graduates in the local area for long-term spending.
  - The proposed PBSA should draw either existing or future students away from existing private rented stock (HMOs) locally, potentially freeing the housing stock for the wider population therefore assisting to alleviate housing market pressures.
  - The provision of PBSA is a key contributor to retaining students in an area once graduated. The development therefore contributes to the long-term regeneration and economic success of the area.
  - Significant improvements to urban greening and improvements to biodiversity habitat.

- The increased presence of students will help to support and sustain the night-time economy of the local area making a valuable contribution to the wider economy, as well as helping to support a safer and more welcoming area at night.
- The proposed development will be highly sustainable achieving BREEAM Excellent.
- Students support the city's economy through their spending (as set out above) but also by driving inward investment, entrepreneurialism and through volunteering in the community and participating in sporting and cultural activities. University students contribute significantly to their wider community through the hours they give to groups, organisations and sporting teams through participation, formal and informal volunteering.
- Jobs will be generated and supported by the proposed development and will provide opportunities for local residents to secure employment.

#### Heritage Benefits (great weight)

- 9.7 In terms of Heritage benefits, the THVIA confirms that alongside delivering beneficial Townscape and Visual Impact improvements, the development also preserves the significance of identified local heritage assets within the Kings Cross St Pancras Conservation Area. In accordance with the NPPF paragraph 212, this should be given great weight.

#### Economic Benefits (significant weight)

- 9.8 The proposed development will deliver the following economic benefits:
- Estimated creation of 113 FTE jobs (both direct and indirect) during the construction phase which translates to £14.7 million in GVA per annum over the project life cycle.
  - Construction period will likely generate opportunities for training and apprenticeships, which will have long-term benefits for London residents. Potential apprenticeships are estimated to amount to around 5% of overall construction jobs.
  - Gross operational impacts include estimated creation of 8 FTE jobs across London, including 5 direct operational jobs and 3 indirect and induced jobs.
  - Through operation, student and visitor spending is estimated to amount to £2.25 million per annum and is estimated to also support the creation of 11 FTE jobs.
  - Direct and indirect impacts of operation are estimated to lead to the contribution of £1.68m GVA per annum; with potential for additional fiscal benefits to be received by LBC in the form of Council Tax from housing freed up in the private rented sector.
  - A Section 106 Agreement could be used to secure the expected jobs for local residents.
  - The proposed development is subject to Community Infrastructure Levy payments which are estimated to be circa £1m towards Local CIL and circa £370,000 towards Mayoral CIL
- 9.9 Paragraph 85 of the NPPF established that significant weight should be placed on the need to support economic growth and productivity, accounting for both local needs and wider opportunities for development.



## 10. Summary and Conclusion

- 10.1 This Planning Statement has been prepared by Knight Frank on behalf of Curlew Developments London Limited & Britannia Street Limited for the redevelopment of Britannia Street Car Park, London, WC1X 9BP.
- 10.2 The proposed development will deliver 121no. PBSA bed spaces and 64sqm community hall (Class F2) alongside hard and soft landscaping, cycle parking, boundary treatments and other associated works.
- 10.3 The Site comprises undeveloped brownfield land with excellent public transport connections situated in Central London. The Site has laid vacant since the 1970s and as such the Site represents a highly sustainable and accessible, yet underutilised Site.
- 10.4 The reason the Site has laid vacant for 50+ years is the London Underground lines which lie in a cutting along the western boundary of the Site and the Thameslink railway line which sits in a shallow tunnel underneath the Site. The nature and condition of this railway infrastructure places significant structural constraints on the Site which makes bringing forward any development extremely challenging, as demonstrated by three previous failed attempts to redevelop the Site.
- 10.5 The proposed development would therefore regenerate underutilised strategic brownfield land, delivering townscape improvements, creating much needed PBSA alongside community space for local residents which support the objectives of the Local Plan. In accordance with NPPF paragraph 125 C the regeneration benefits of the proposal and the redevelopment of the brownfield site should be given substantial weight.
- 10.6 With respect to the PBSA provision, the application demonstrates that there is clear demand for such accommodation of this type in this location. There are 92,000 full-time students studying at 11 HEIs within a one mile radius of the Site and the delivery of PBSA is necessary to meet the significant existing, and growing need for purpose built student accommodation in the area.
- 10.7 There are 11,550 students living within a 0.5 mile radius of the Site, while there are only 4,645 PBSA bed spaces meaning there are 2.5 full-time students to every PBSA bed space resulting in the fact most of the students in the area live in conventional (C3) housing stock. Despite this shortfall in accommodation, no new PBSA has been delivered in the King Cross ward since 2016 and no other PBSA developments are currently proposed.
- 10.8 In terms of a mixed and balanced community, the Site is largely isolated from other PBSA in the Kings Cross ward and on this basis the delivery of an additional 121 student beds will not result in an excessive concentration of PBSA in the locality. Furthermore, one new student bed is not necessarily equal to an additional student in the area as there is a high likelihood of the PBSA absorbing students that already live in the area, at least in part, instead of adding to the total student population.
- 10.9 It is clear that students already form part of the local community, and as established through the NPPF, the London Plan and the Local Plan, the housing needs of students must be met. This includes both in terms of numbers, but also in terms of type and quality of student accommodation.
- 10.10 The proposed development delivers on these policy requirements, delivering 121no. PBSA beds. The PBSA has been designed to deliver modern high-quality accommodation that offers students an exceptional place to live with spacious and carefully planned rooms. The wellbeing of occupants has been a primary consideration in the design process.
- 10.11 The delivery of PBSA contributes towards housing supply directly, and also through the release of housing stock to non-students. Overall the delivery of PBSA to respond to local and strategic needs should be given significant weight.
- 10.12 In addition to the provision of high-quality PBSA, the development will deliver a 64sqm community hall at ground floor which will provide space for local residents, groups and charities to use which will help integrate the development into the wider community.
- 10.13 The development will also provide a substantial financial contribution for the delivery of affordable conventional housing in the area. Furthermore, the Applicant continues to engage with residents of Derby Lodge to explore opportunities to deliver improvements to their courtyard amenity space.
- 10.14 In terms of design, this Planning Statement should be read alongside the DAS, Accessibility Statement and THVIA. These documents fully explain the design rationale, and justify it in architectural, heritage and townscape terms.

- 10.15 The THVIA confirms that alongside delivering beneficial Townscape and Visual Impact improvements, the development also preserves the significance of identified local heritage assets within the Kings Cross St Pancras Conservation Area. In accordance with the NPPF paragraph 212, this should be given great weight.
- 10.16 It is concluded that the proposed development is of an appropriate layout and density which optimises the Site, is high-quality in terms its appearance and provision of PBSA and is designed to be inclusive and accessible in accordance with London Plan and Local Plan policies.
- 10.17 The landscaping and public realm strategy that supports the proposed development will deliver enhanced public realm along Britannia Street and Wicklow Street which will benefit both existing local residents and future residents. The scheme will deliver a significant improvement to BNG and a UGF score of 0.40 in accordance with London Plan and Local Plan policies.
- 10.18 In terms of amenity impacts, transportation, highways, sustainability and energy, this Planning Statement and the supporting submission documents collectively conclude compliance with the development plan policies.
- 10.19 Overall, as set out within this statement, the proposed development will bring the Site back into socio-economic use delivering significant regeneration benefits, which in accordance with NPPF should be given substantial weight in decision making. Additionally, the heritage benefits of the proposal should be attributed great weight and the economic benefits should be attributed significant weight in decision making.
- 10.20 Given the above, it is concluded that the proposals accord with the Development Plan as well as national guidance and on this basis, it is concluded that planning permission should be granted. In addition, it has been demonstrated that the development will deliver a range of significant planning benefits, which are material to the consideration of the application, and these also strongly indicate that planning permission should be granted.

Knight Frank, Planning Team  
55 Baker Street, London, W1U 8AN  
+44 20 7629 8171

[knightfrank.co.uk](https://www.knightfrank.co.uk)

Knight Frank LLP is a limited liability partnership registered in England and Wales with registered number OC305934. Our registered office is at 55 Baker Street, London W1U 8AN. We use the term 'partner' to refer to a member of Knight Frank LLP, or an employee or consultant. A list of members' names of Knight Frank LLP may be inspected at our registered office.

Regulated by RICS

Your partners in property