

1-11 EUSTON ROAD

LONDON, WC1



**JUSTIFICATION FOR DEMOLITION & REPLACEMENT  
PART 1**

**(REVISED MARCH 2011 - PPS5)**

CONSERVATION PD  
(PLANNING + DESIGN)  
Eleni Makri RIBA IHBC AABC

**DECEMBER 2008**

CONSERVATION PD  
planning + design

a 151 Rosebery Avenue  
London EC1R 4AB  
t +44 020 7837 6393  
f +44 020 7278 6645  
m +44 07789 988 484  
e [elenimakri@conservationpd.com](mailto:elenimakri@conservationpd.com)  
w [www.conservationpd.co.uk](http://www.conservationpd.co.uk)

# Contents

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

## PART 1

- 1 Introduction
- 2 Designations, Statutory Provision and Published Guidance
- 3 Assessment: historic development
- 4 Assessment: the setting of the two grade I listed buildings
- 5 Assessment: the character and / or appearance of the conservation area; the setting of the conservation area
- 6 Assessment: Nos. 1-11: building typology and condition
- 7 Nos. 1-11: upgrading for re-use feasibility options and costs
- 8 Conclusions
- 9 References
- 10 Appendix

### List of Appendices

- |             |  |
|-------------|--|
| Appendix 1  | Location Plan & CA Designation             |
| Appendix 2  | OS 1970                                    |
| Appendix 3  | OS 1934 - 1940                             |
| Appendix 4  | Analysis of Historic Development           |
| Appendix 5  | Kings Cross Conservation Area              |
| Appendix 6  | Historic Photograph                        |
| Appendix 7  | Unlisted Buildings Table                   |
| Appendix 8  | Photographic Documentation                 |
| Appendix 9  | Bloomsbury Conservation Area Map 1832      |
| Appendix 10 | Minutes of Meeting with Camden of 02/02/07 |

## PART 2

- |             |   |
|-------------|---|
| Appendix 11 | Feasibility Studies - Options 1-6 (BG Studio) |
|-------------|---|

## PART 3

- |             |   |
|-------------|---|
| Appendix 12 | Financial Assessment of Feasibility Studies |
|-------------|---|

## 1. Introduction

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

- 1.1 Nos. 1-11 Euston Rd occupy a prominent location in the Kings Cross Conservation Area in the London Borough of Camden opposite the grade I listed Kings Cross Station and St. Pancras Station and St Pancras Chambers buildings (see Appendices 1 and 5). Nos. 1-7 are in office use, nos. 9-11 comprise the Northumberland Hotel and there are several shops occupying what would have been original forecourts to these terrace properties. The facilities throughout are rather poor and outdated, although the buildings have been maintained and are in full use. A photographic documentation of these buildings and their context is in Appendix 8.
- 1.2 Formal pre- application consultations, carried out in early 2007 by Metropolis PD with the Planning Department of the London Borough of Camden on replacing these buildings, established the Council's requirement for a financial assessment of the option of upgrading and restoring the existing buildings for re-use. The local planning authority considers these buildings as making a positive contribution to the character and or appearance of the conservation area. Consequently, it requested that the relevant PPG15 provision of assessing demolition proposals against the criteria set out for the demolition of listed buildings should be applied and the viability of refurbishment and re-use be tested. The Council's written advice following these consultations is in Appendix 9.
- 1.3 Accordingly, this report was first compiled in December 2008, its scope primarily having been to consider and discuss options for the refurbishment and re-use of these buildings and their viability. Six feasibility options were considered, all drawn with the restoration, retention, and contextual extension of these buildings as the underlining principles of alteration, in accordance with relevant published guidance for works to unlisted buildings held to be making a positive contribution to the character and / or appearance of a conservation area. The alterations aimed to bring the buildings and existing or new uses within up to contemporary standards. They are all shown as Options 1-2 in Appendix 10 in Part II of this report. The condition of the existing buildings and (poor) quality of facilities provided at present are also described as they are what gives rise to the requirement for updating. This is all also considered in the context of the initiatives in the area which have now made this location the arrival point to London from Continental Europe. The financial assessment of Options 1-6 is by MDL Consulting and is attached as Appendix 11 in Part III of this report.
- 1.4 PPG15 was cancelled in March 2010 following the publication of PPS5. It was therefore felt appropriate to update the original report to ensure that it is consistent with current government planning policies for the historic environment. References made to PPG15 are retained so that the current policy and the original consultation with Camden remain linked.

## 2. Designations, Statutory Provision and Published Guidance

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

- 2.1 The following statutory designations apply:
- Kings' Cross Conservation Area, LB Camden, see Appendices 1, 5
  - King's Cross Conservation Area, LB Islington, see Appendix 1
  - Bloomsbury Conservation Area, LB Camden, see Appendices 1, 9
- 2.2 The following statutory provision and published guidance are relevant:
- 2.2.1 **Contribution of unlisted buildings**
- Conservation Area Practice. English Heritage - Aug. 2005
- Appendix 2: *Unlisted Buildings in a Conservation Area* provides a list of criteria, which are aimed to assist the assessment of the contribution of unlisted buildings to the character and/or appearance of a conservation area;
- 2.2.2 **Conservation Area Control Over Demolition**
- The Planning (Listed Buildings and Conservation Areas) Act 1990
- 2.2.2.1 Section 72 of the Act requires that special attention be paid in the exercise of planning functions to the desirability of preserving or enhancing the character and or appearance of a conservation area.
- 2.2.2.2 Section 74 confirms that conservation area designation introduces control over demolition.
- (• PPG15
- 2.2.2.3 Until its cancellation in 2010, PPG15 Paragraphs 4.21 - 4.29 provided governmental guidance as to the considerations that should apply in the demolition of unlisted buildings in conservation areas. Importantly, there was a presumption against the demolition of buildings which make a positive contribution to the designated local character and a requirement that proposals for demolition should be justified against the same criteria that applied to the demolition of listed buildings - these criteria were provided in PPG15 Paragraphs 3.16-3.19-. In cases of buildings of little or no contribution, the quality of the replacement scheme was deemed to be a key consideration.)
- PPS5 and PPS5 English Heritage Practice Guide
- 2.2.2.4 PPS5 has introduced the concepts of the 'heritage asset', 'designated heritage asset' and 'heritage asset significance'.



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

- 2.2.2.5 The definition of ‘heritage asset’ is in *Introduction 5*: ... Those parts of the historic environment that have significance ... are called heritage assets ... Some heritage assets possess a level of interest that justifies designation (see Annex 2)... This statement (PPS5) also covers heritage assets that are not designated but are of heritage interest and are thus a material planning consideration ...
- 2.2.2.6 The definition of ‘designated heritage asset’ is provided in *Annex 2: Terminology*: a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated as such under the relevant legislation.
- 2.2.2.7 Accordingly, the group of buildings at nos 1-11 Euston Rd is a ‘heritage asset’ within the context of a ‘designated heritage asset’ (the Kings Cross Conservation Area).
- 2.2.2.8 *HE6.1* advises that: Local Planning Authorities should require an applicant to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance ... The level of detail should be proportionate to the importance of the heritage asset ... As a minimum the relevant historic environment record should have been consulted and the heritage assets themselves should have been assessed using appropriate expertise ...
- 2.2.2.9 *HE7.1* advises that: ... local planning authorities should seek to identify and assess the particular significance of any element of the historic environment that may be affected ... taking account of:
- (i) evidence from application;
  - (ii) any designation records;
  - (iii) the historic environment record and similar sources of information;
  - (iv) the heritage assets themselves;
  - (v) the outcome of the usual consultations with interested parties;
  - (vi) where appropriate ... expert advice ...
- 2.2.2.10 *HE7.2* advises that: ... local planning authorities should take into account ... the value (of the asset) ... for this and future generations ...; *HE7.3* and *HE7.4* advises on the significance of heritage assets on place - making and the establishment of



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

sustainable communities and the role of consultations with the community in establishing such significance where normal consultations are not adequate in this respect;

2.2.2.11 *HE8* is additional policy principle guiding the consideration of applications for consent relating to heritage assets that are not covered by policy *HE9*, in other words for ‘heritage assets’ such as nos 1-11 Euston Road. *HE8.1* advises that: The effect ... on the significance of such a heritage asset or its setting is a material consideration in determining the application;

2.2.2.11 *HE9.1* advises that: There should be a presumption in favour of the conservation of designated assets and the more significant the designated heritage asset the greater the presumption ... Loss affecting any designated heritage asset should require clear and convincing justification ... Policy *HE9.2* lists the criteria that would have to be met in the case of proposed substantial harm or total loss of significance of a designated asset:

‘Where the application will lead to substantial harm to or total loss of significance local planning authorities should refuse consent unless it can be demonstrated that:

(i) the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss;

or

(ii)

(a) the nature of the heritage asset prevents all reasonable uses of the site; and

(b) no viable use of the heritage asset itself can be found in the medium term that will enable its conservation; and

(c) conservation through grant-funding or some form of charitable or public ownership is not possible; and

(d) the harm to or loss of the heritage asset is outweighed by the benefits of bringing the site back into use.’

Policies *HE9.3* and *HE9.4* provide for evidence of marketing and for the case of harm that is not substantial.

2.2.2.12 Policies *HE9.1*, *HE9.2*, *HE9.3* and *HE9.4* are relevant to the proposed demolition of the group of buildings at nos. 1-11 Euston Road in that Conservation Area Consent for Demolition is required for a group of buildings within the Conservation Area which the local planning authority considers as making a positive



1-11 EUSTON ROAD,  
LONDON

## DEMOLITION STATEMENT

contribution to the character and /or appearance of the conservation area. (These PPS5 policies can therefore be held to have replaced the cancelled PPG15 policies 4.21-4.29 and 3.16-3.19.)

- 2.2.2.13 Policy *H9.5* recognises that not all elements within a Conservation Area make a positive contribution to the significance of a Conservation Area and that local authorities should take into account the relative significance of the asset and the opportunities that would may make it possible to enhance or better reveal the significance of the Conservation Area, including redevelopment. *HE7.5* advises that: Local planning authorities should take into account the desirability of new development ... The relevant English Heritage Guidance (clause 80) advises that:

‘Policies *HE7.5*, *HE9.5* and *HE10* require attention to the extent to which the design of new development contributes positively to the character, distinctiveness and significance of the historic environment. A successful scheme will be one whose design has taken account of the following characteristics of the surroundings, where appropriate:

1. The significance of nearby assets and the contribution of their setting.
  2. The general character and distinctiveness of the local buildings, spaces, public realm and the landscape.
  3. Landmarks and other features that are key to a sense of place.
  4. The diversity or uniformity in style, construction, materials, detailing, decoration and period of existing buildings and spaces.
  5. The topography.
  6. Views into and from the site and its surroundings.
  7. Green landscaping.
  8. The current and historic uses in the area and the urban grain.
- Some or all of these factors may influence the scale, height, massing, alignment, materials and proposed use in any successful design.’

## 2.2.3 **Setting of Listed Buildings**

### 2.2.3.1 (• PPG15

Paragraphs 2.16 - 2.17 dealt with the setting of listed buildings. Importantly, they advised that “when a listed building forms an important visual element in the street, it would probably be rightly to regard any development in the street as being within the setting of the building.” This statement leaves no doubt that the group of buildings at nos. 1-11 Euston Road affect the setting of the Grade I





1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

listed Kings Cross and St Pancras Stations and St. Pancras Chambers; for relative locations see Appendix 1.)

- PPS5 and PPS5 English Heritage Practice Guide

2.2.3.1 The relevant PPS5 policy on designated asset settings is *HE10*. The English Heritage Practice Guide provides guidance under this policy heading on ‘Understanding setting and its contribution to significance’ and also on Assessing the implications of change affecting setting’ (pp 33-35). This guidance confirms that the group of buildings at nos. 1-11 Euston Road affect the setting of the Grade I listed designated assets of Kings Cross and St Pancras Station and Chambers, their relative locations shown in Appendix 1. Policy *HE10* advises that local planning authorities should treat favourably applications that preserve or better reveal those elements that make a positive contribution to a designated asset’s setting.

2.3 The following published documents are relevant:

- 2.3.1 Conservation Area Appraisal documents
- Kings’ Cross Conservation Area, LB Camden (2004)
  - King’s Cross Conservation Area, LB Islington
  - Bloomsbury Conservation Area, LB Camden (existing and in draft)
- 2.3.2 English Heritage guidance
- Guidance on conservation area appraisals, August 2005
  - Guidance on the management of conservation areas, August 2006

### 3. Assessment: historic development - asset significance

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

#### 3.1 Euston Rd (1750 -1820)

- 3.1.1 The Council's appraisal statement provides important information on the historic development of Euston Rd and the surrounding streets. Accordingly, this road was constructed as New Road in 1756 and quickly developed as a residential area, in the period from 1750-1820 (Camden, Kings Cross, 3.3.1). An Act of Parliament restricted development to 50 feet from the road which resulted in the deep gardens of the new residences fronting the road still seen on the south side at nos. 1-11 and adjoining terrace in the 1870 historic OS extract in Appendix 2.

#### 3.2 Adjoining streets (1820 -50)

- 3.2.1 In the period from 1820-50, residential development intensified in the area. St Chad's St, Crestfield St (then Chesterfield St) and Birkenhead St (then Liverpool St) were laid out and standardized 'third class' Georgian housing, of 3 floors and a basement were built (see Council's Appraisal for Kings Cross CA paragraph 3.4.3, p11). The area is shown in the Bloomsbury Conservation Area map of 1832 in Appendix 9. Also shown on this map are nos. 1-7 Birkenhead St, a grade II listed terrace of 7 houses dating to c 1827-32. Of the same date and style are the grade II listed nos. 1-7 Chad's St and adjoining terraces in the Bloomsbury Conservation Area.

#### 3.3 Euston Rd Northside (1850 – 1900):

- 3.3.1 Kings Cross Station (1852); St Pancras Station (1864-68), Former Midland Grand Hotel / St Pancras Chambers (1876).
- 3.3.2 Interestingly, both passenger termini were by Act of Parliament allocated land on the north side of Euston Rd as the land to the south was fully developed by then. Kings Cross Station, completed in 1852, was largely built on the garden plots to the west of York Way (then Maiden Lane) and on the grounds of the Small Pox Hospital and Fever Hospital, which had to be relocated.
- 3.3.3 By contrast, the development of St Pancras Station, which was constructed in 1864-68, required the demolition of large areas of Somers Town and Agar Town, an area to the north of the Old St Pancras Church and the relocation of part of the burial grounds of the St Pancras Churchyard. The Midland Grand Hotel (now St Pancras Chambers) was completed in 1876.



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

---

### 3.4 Euston Rd Southside (1850-1900)

- 3.4.1 The arrival of the two termini introduced a commercial element in the road, which in the first instance was responsible for the loss in this period of the deep front gardens of nos. 1-11 Euston Rd still shown in the OS extract of 1870 in Appendix 2 to single storey commercial concerns and change from residential to commercial use. A historic photograph in p 13 of the Camden Kings Cross CA Appraisal document shows both the 'Lighthouse' Grade I listed building of 1875 and the existing curved terrace across at Grays Inn Road adjoining nos. 1-11 Euston Rd. This photograph must date post 1870 and before 1912 (when the horse drawn trams went out of use in London). A horse drawn tram hides the ground floors of nos. 1-11 from view. However, comparison of this photograph with recent photographs of the same group of buildings would suggest that it would appear that the original, mid 18th century residential, terrace -buildings on this site quite possibly had been taken over by a 'Cafe Restaurant' concern as the high level prominent advertisement sign would suggest.

### 3.5 Euston Rd Southside (1900- date)

- 3.5.1 The influence on the changing character of Euston Rd of the two termini is shown in the gradual loss of the residential character of its Southside and of Grays Inn Road in the 19th century as seen above which was further accelerated in the 20th century as shown by the buildings extant today and their date of construction. Today the buildings in the stretch of Euston road Southside within the Kings Cross Conservation area all appear to date from the 1930s, with the exemption of the Town Hall Annexe, which was constructed in 1974 and they are as follows (refer to the 1934-40 OS extract in Appendix 3 and to the photographic documentation in Appendix 8):
- 3.5.2 The Town Hall, 1934-7 (listed grade II)
- 3.5.3 The Town Hall Annexe, a 1974 extension to the 1930s building (CA appraisal considers it as making a negative contribution)
- 3.5.4 Argyle House, 1930s is shown on the 1934 -40 OS extract in Appendix 3 (and therefore is not a mid – 20th century building as suggested in the CA Appraisal, p 37)
- 3.5.5 Nos. 23-27, is a 1930s Bank building (which was recently allowed a two storey mansard extension)



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

- 3.5.6 Nos. 13-21, appears to be a 1930s symmetrical composition which started life as the Kings Cross Coach Station (and not a 1950s building as suggested in the CA appraisal document)
- 3.5.7 Nos. 1-11 Euston Rd  
Nos. 1-11, does not date from the c1840s and it is not a 'vestige of the original Euston Road frontage buildings ...' as suggested in the Council's statement (p.38, 4.2.101).
- 3.5.8 In order to understand the development of this group of buildings it is important to see how it works today and how its elevational treatment relates to that of the buildings in the vicinity and the adjoining streets. Looking at how the terrace works today, nos. 1-3 are accessed from Birkenhead Street (and not from Euston Rd despite the Euston Rd address) and they display late/post 1870s Victorian eclecticism in their facades and a highly decorated return elevation (photos nos. 9, 16, 17). Similarly, nos. 9-11 the pair at the other end of the terrace is also accessible from the side street, Cressfield Street (and not from Euston Rd again despite its address) while it also displays elaborate front and return elevations which are different to those at nos. 1-3. The two mid-terraces, nos. 5-7 show a different situation: the upper floors of no.5 are accessed through a long corridor from Euston Rd whereas the upper floors at no. 7 are only accessible through the shop.
- 3.5.9 Looking at the front facades of the terrace it is now clear that nos. 5-7 retain the original Georgian elevations of the Georgian housing that first lined New Road in mid-18th century and the similarities to the smaller surviving Georgian terraces in Birkenhead Rd and Cressfield St within the Bloomsbury conservation area is telling (photos nos. 15 and 18). The story therefore enfolds as follows: The original Georgian residential buildings were by the end of the 19th century taken over by commercial use and their former forecourts by shops. The two end pairs were extended and converted; nos. 1-3 to offices and nos. 9-11 to a hotel respectively. The two middle terraces posed difficulties in accessing the top floors from the street as the shops on the former forecourts presented a deep obstruction. This led to substandard occupation and underuse and no interest in extension and elevational remodeling other than painting the originally exposed brickwork.
- 3.5.10 The relationship of these buildings as existing with the original



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

Georgian buildings on this site is shown in Appendix 4. This also demonstrates that to attempt to restore the front facades of this originally Georgian residential terrace by removing the unsightly and detracting shops from the original forecourts would be folly. This is because the original ground floor treatment has been physically lost but furthermore because the ground floor treatment would have otherwise been individual to each of the 3 pairs with the end pair at nos. 9-11 uniquely displaying a single storey extension over what would have been the lightwells of the original Georgian house configuration. So which ground floor should we then restore and is the group still assessed as making a positive contribution to the character of the conservation area as claimed in the Council's statement?

- 3.5.11 It has been demonstrated that the Council's statement was wrong in its assessment of the history and date of these buildings and their remodelling. It is therefore worth re-assessing the contribution that these unlisted buildings make to the character and/or appearance of the conservation area by applying the English Heritage test suggested in Appendix 2 of the English Heritage "Guidance on conservation area appraisals - August 2005" document. The application of this test is shown in the table in Appendix 7 of this document.

#### 4. Assessment: the setting of the two grade I listed buildings

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

##### 4.1 The setting of the grade I listed termini buildings of Kings Cross and St Pancras partly comprises of the following group of buildings:

- 4.1.1 Euston Rd Southside, namely the stretch from the grade II listed Town Hall to nos. 1-11 Euston Rd inclusive; the adjoining building of the curved terrace in Grays Inn Rd Westside and grade II listed 'Lighthouse' of 1875 in Grays Inn Rd Eastside; York Way Westside at the corner with Pentonville Road, a locally listed building of the 1840s in the London Borough of Islington Kings Cross Conservation Area, originally with a PH use at the ground floor (now a McDonalds) and adjoining replacement buildings along Pentonville Road.
- 4.1.2 In effect, the setting of the two grade I listed termini comprises of two listed buildings, The Town Hall in Euston Rd (1930s) and the 'Lighthouse' (1875) in Grays Inn Rd, and a number of 1930s buildings of varying heights, architectural idiom and degree of alteration including a recent two storey mansard extension to one of these. All these unlisted buildings are considered by the Local Planning Authority as making a positive contribution to the character of the conservation area although how the relevant test in the English Heritage guidance applies is not explained in the appraisal document. Given however, the quality of the Kings Cross and St Pancras ensembles, it would appear that this approach condemns these two grade I listed buildings to the retention of a setting consisting of 1930s mediocre, speculative buildings, which may be inappropriate.
- 4.1.3 This setting has recently been further altered with the construction in Pentonville Rd of a high rise building clad in green and blue glass which now towers over the Grays Inn Rd buildings in the Conservation Area (photos nos. 14 and 15).

## 5. Assessment: the character and / or appearance of the conservation area; the setting of the conservation area

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

- 5.1 Euston Rd is dominated by Kings Cross and St Pancras. Then there is Euston Rd Southside which displays mainly a variety of 1930s architectural trends in replacement of early Georgian residences; also, the areas behind which pre-date the arrival of the two termini and form parts of Georgian Bloomsbury with all buildings being listed.
- 5.2 This is the context of the conservation area, the focus being the two grade I listed termini with their setting to the South being provided by a number of listed buildings and other buildings of the 1930s of varying architectural idiom, degree of preservation and interest.

## 6. Assessment: Nos. 1-11: building typology and condition

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

### 6.1 Access to the floors above

- 6.1.1 The existing situation is shown in the plans in Appendix 11. Piecemeal alterations and extensions have taken place over the years, with terraces 1-3 and 9-11 having been latterly combined. The upper floors of middle terraces nos. 5-7 are the most difficult to access as a result of the deep single storey shops that have taken over original forecourts. As already explained elsewhere, access to the upper floors of no. 5 for example is through a long and unpleasantly narrow passage with a front door onto Euston Rd while the upper floors of no. 7 are only accessed through the same passage and the upper floors to no 5. These shops are an anomaly that dates back to the late 19th early 20th centuries and singularly appears here.

### 6.2 Original vaulted basement and front façade lightwell construction

- 6.1.2 The ground and basement floor plans show that there are 3 bands of structural walls surviving in addition to the main external wall to the rear. These are the front wall to the terrace and two parallel walls which possibly define the extent of the original (Georgian) vaulted basements and intervening lightwells between these and the front facades of the original buildings on this site, which are typical of Georgian terraces in London. At no. 11 the depth of the original lightwell appears to have been taken over by a single storey forward extension of an architectural idiom similar to the rest of the building. Elements such as this do not survive anywhere else in the ground floors of the group; nor is there any indication that they ever existed.

### 6.3 The hotel

- 6.3.1 Nos. 9-11 are used as a hotel. There are no en-suite rooms, the bath and w. c. facilities per floor are rather limited, the size of the rooms and the quality of the facility overall mean and inadequate. The absence of accessibility is a key problem.

### 6.4 The offices

- 6.4.1 Nos. 1-3 are offices occupied by several concerns, completely inadequate by current standards of user expectation and accessibility.



## 7. Nos. 1-11: upgrading for re-use feasibility options and costs

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

7.1 The following 5 options of upgrading and re-use of the group, all shown in Appendix 11, have been tested for their financial viability. These are as follows:

### 7.2 Option 1

#### Hotel

- (i) Retention of existing uses within buildings
- (ii) Remodeling of existing hotel including the introduction of a lift and all room en-suite (26 rooms); rebuilding of existing later end extension onto Crestfield Rd to achieve level access with the rear wing of the hotel

#### Offices

- (iii) Remodeling of offices to provide access for all upper floors from Birkenhead Rd
- (iv) Introduction of lift
- (v) Introduction of adequate kitchen and bathroom facilities to current standards

#### Shops

- (vi) Remodeling of existing shops to provide better shopfronts, better light through roof lights and facilities to current standards

### 7.3 Option 2

#### Hotel

- (i) - (ii) as in option 1

#### Offices

- (iii) – (v) as in option 1

#### Shops

- (vii) Removal of existing shops area to the line of the single storey forward bay of no. 11
- (viii) Construction of single storey bays throughout the ground floor of the remaining group
- (ix) Re-use ground floors throughout as shops and improve facilities as in option 1

### 7.4 Option 3

#### Hotel

- (i)-(ii) as in option 1 + a mansard roof on Crestfield Street (31 rooms)



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

Offices  
(iii)-(v) as in option 1

Shops  
(vii)-(ix) as in option 2

#### 7.5 Option 4

Hotel  
As in option 3 + remodeling the offices and re-use as a hotel (45 rooms)

Shops  
As in option 3

#### 7.6 Option 5

Hotel  
As in option 4 + mansard roof extension onto Euston Rd (54 rooms)

Shops  
As in option 4

#### 7.7 Option 6

As in option 5 + kiosks

#### 7.8 The financial assessment of these options by MDL consulting is in Appendix 12. The table on the next page is a summary of their results.



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

TABLE - Summary of Financial Assessment Options 1-6

Option 1	Retention of hotel, shops and offices	Loss	£6,429,200
Option 2	Retention of hotel and offices and alterations to shops	Loss	£7,065,045
Option 3	Retention of hotel and offices and alterations to shops, Mansard roof extension to hotel	Loss	£7,980,549
Option 4	Retention of hotel, incorporation of offices into hotel, mansard roof extension to hotel and alterations to shops	Loss	£8,694,086
Option 5	Retention of hotel, incorporation of offices into hotel, mansard roof extensions to hotel, alterations to shops	Loss	£9,667,849
Option 6	Retention of hotel, incorporation of offices into hotel, mansard roof extensions to hotel, alterations to shops and two new shop kiosks	Loss	£9,552,828

7.9 This demonstrates that all six possible retention scenarios are economically unviable propositions.

## 8. Conclusions

---



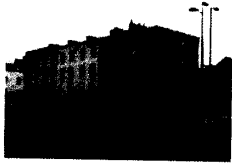
1-11 EUSTON ROAD,  
LONDON

### DEMOLITION STATEMENT

- 8.1 It has been demonstrated that nos.1-11 Euston Rd are a phased remodeling of mid – 18th Century Georgian terraces, the earlier buildings on New Rd (Euston Rd). Following the arrival of the two Train Termini on the North Side of Euston Rd, the residential character of Euston Rd South Side was gradually replaced with commercial development in the 1930s.
- 8.2 Nos. 1-11 presents an oddity in this overall replacement experience. Strategically positioned opposite Kings Cross, the original Georgian residences at first lost their front gardens and original use to single storey shops and restaurant – café uses. Later the two end pairs were completely remodeled (post -1870) to offices and hotel respectively whereas the pair in the middle remained largely underused having lost direct access to the floors above.
- 8.3 The original ground floor elevations and light-wells are all missing and there is no going back as the later Victorian interventions have taken a different direction with the end terrace nos. 9-11 actually displaying a single storey forward extension, uniquely so in the remodeled group. So this is a confused situation of unsightly shop -fronts and shops badly relating to the buildings behind whose removal would be of no benefit to restoring the missing facades. This is because the post 1870s remodeling took place after their earlier loss and without consideration given to their replacement.
- 8.4 Consequently, the assessment of this terrace against the English Heritage Criteria demonstrates that it cannot be taken as making a positive contribution to the character of the conservation area.
- 8.5 The financial assessment of the conversion of the building and updating of the current use shows a significant loss in all 6 tested options.
- 8.6 In conclusion, it has therefore been demonstrated that with reference to the PPS5 criteria relevant to the conservation area controls over demolition and in particular those in policy *H9.2*, the replacement of nos. 1-11 can be fully justified (as was previously demonstrated to be the case with the now cancelled PPG15 criteria relevant to the conservation area controls over demolition -paragraphs 4.21-4.29- and the demolition of unlisted buildings in a conservation areas -paragraphs 3.16-3.19-).
- 8.7 Further, with reference to policy *HE.10* of PP5 on the setting of designated heritage assets, it has also been demonstrated that a replacement scheme may provide a real opportunity for an improved setting for the Grade I listed Kings Cross Station and St. Pancras Station and Chambers buildings in a most important location in London, the point of arrival from Europe.

## 9. References

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

- 9.1 Conservation Area Appraisal documents
  - Kings' Cross Conservation Area, LB Camden
  - King's Cross Conservation Area, LB Islington
  - Bloomsbury Conservation Area, LB Camden
- 9.2 PPS5 and PPS5 English Heritage Guidance (March 2010)
- 9.3 English Heritage Guidance on Conservation Area Appraisals
- 9.4 Historic OS Maps

## 10. Appendices

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

### List of Appendices

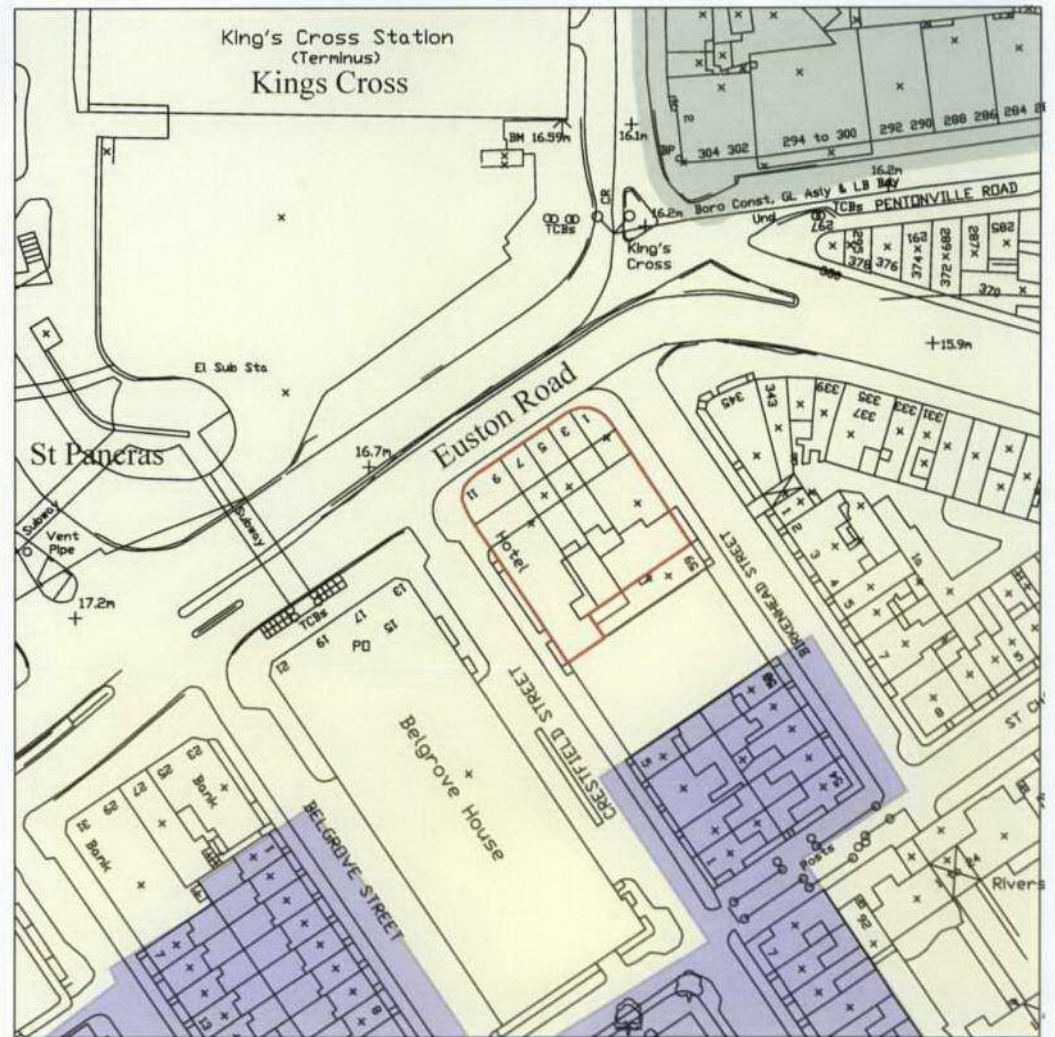
Appendix 1	Location Plan & CA Designation
Appendix 2	OS 1970
Appendix 3	OS 1934 - 1940
Appendix 4	Analysis of Historic Development
Appendix 5	Kings Cross Conservation Area
Appendix 6	Historic Photograph
Appendix 7	Unlisted Buildings Table
Appendix 8	Photographic Documentation
Appendix 9	Bloomsbury Conservation Area OS Map 1832
Appendix 10	Minutes of Meeting with Camden of 02/02/07

## 10. Appendix 1: Location Plan & CA Designation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT



- 1-11 Euston Road
- Kings Cross CA Camden
- Kings Cross CA Islington
- Bloomsbury CA Camden

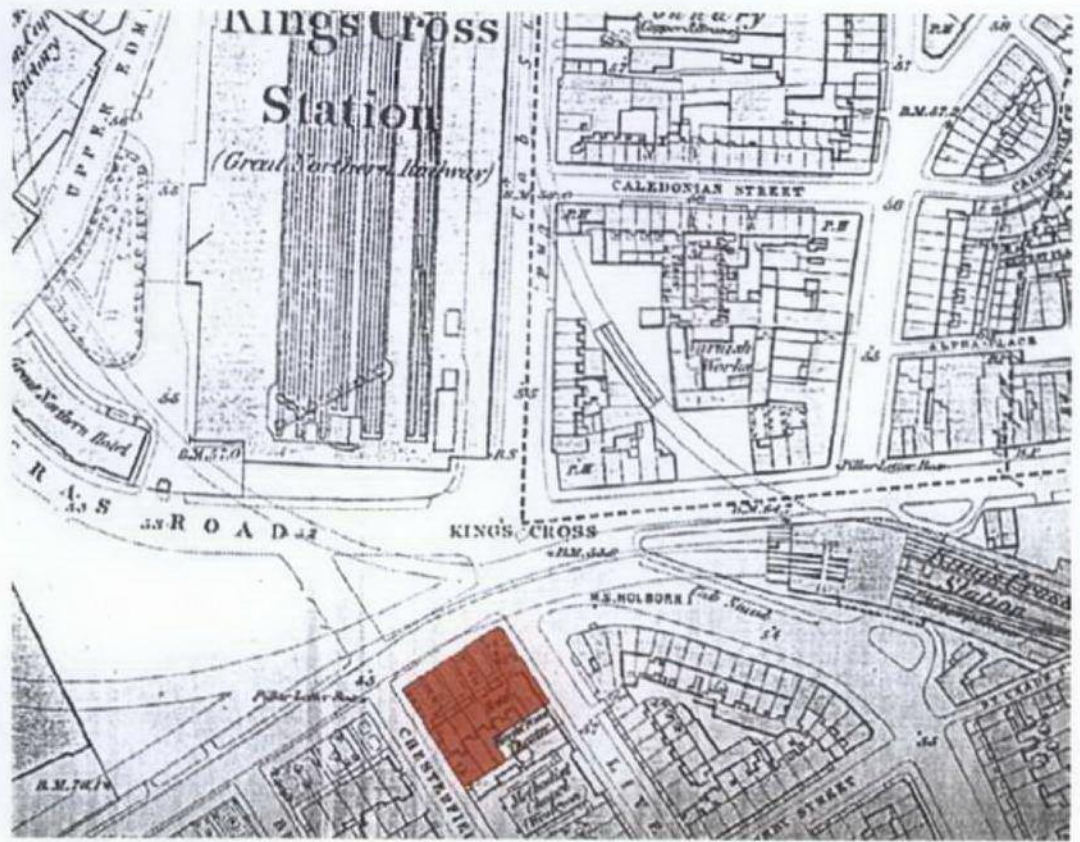


## 10. Appendix 2: Historic Development 1870



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT



1870

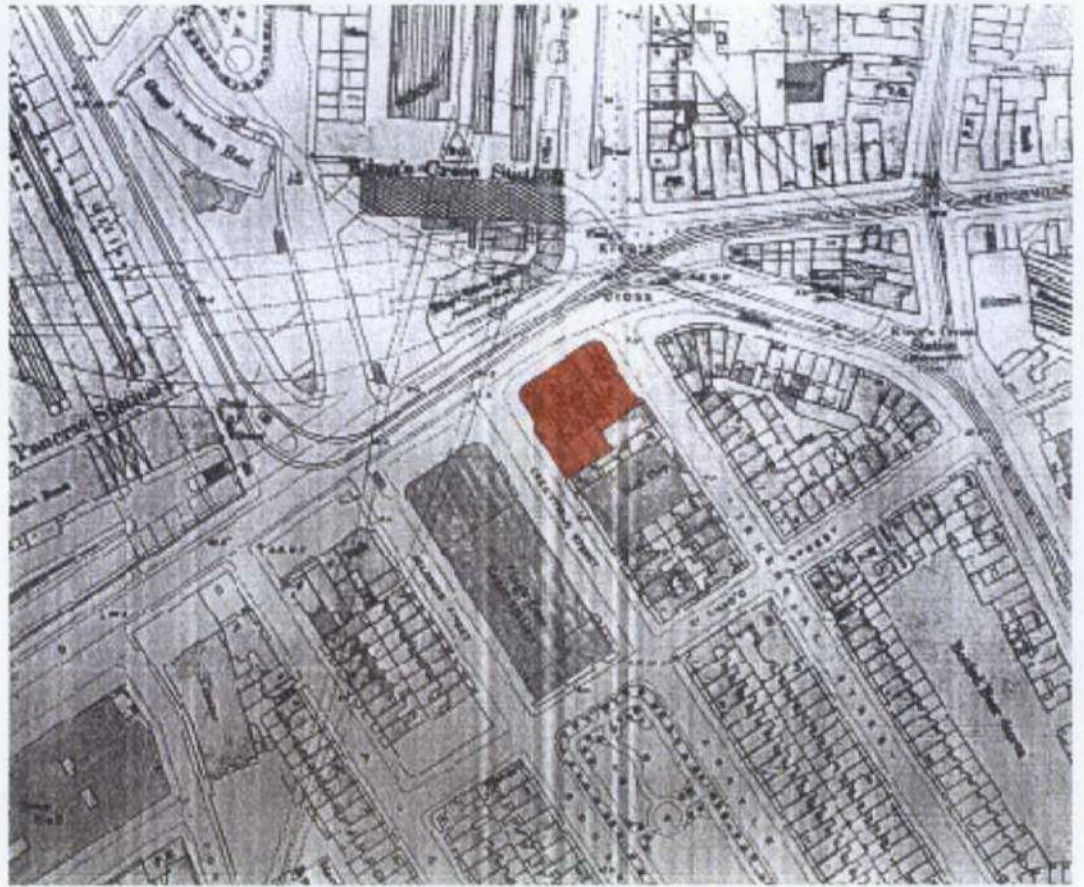


## 10. Appendix 3: Historic Development 1934 - 1940



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT



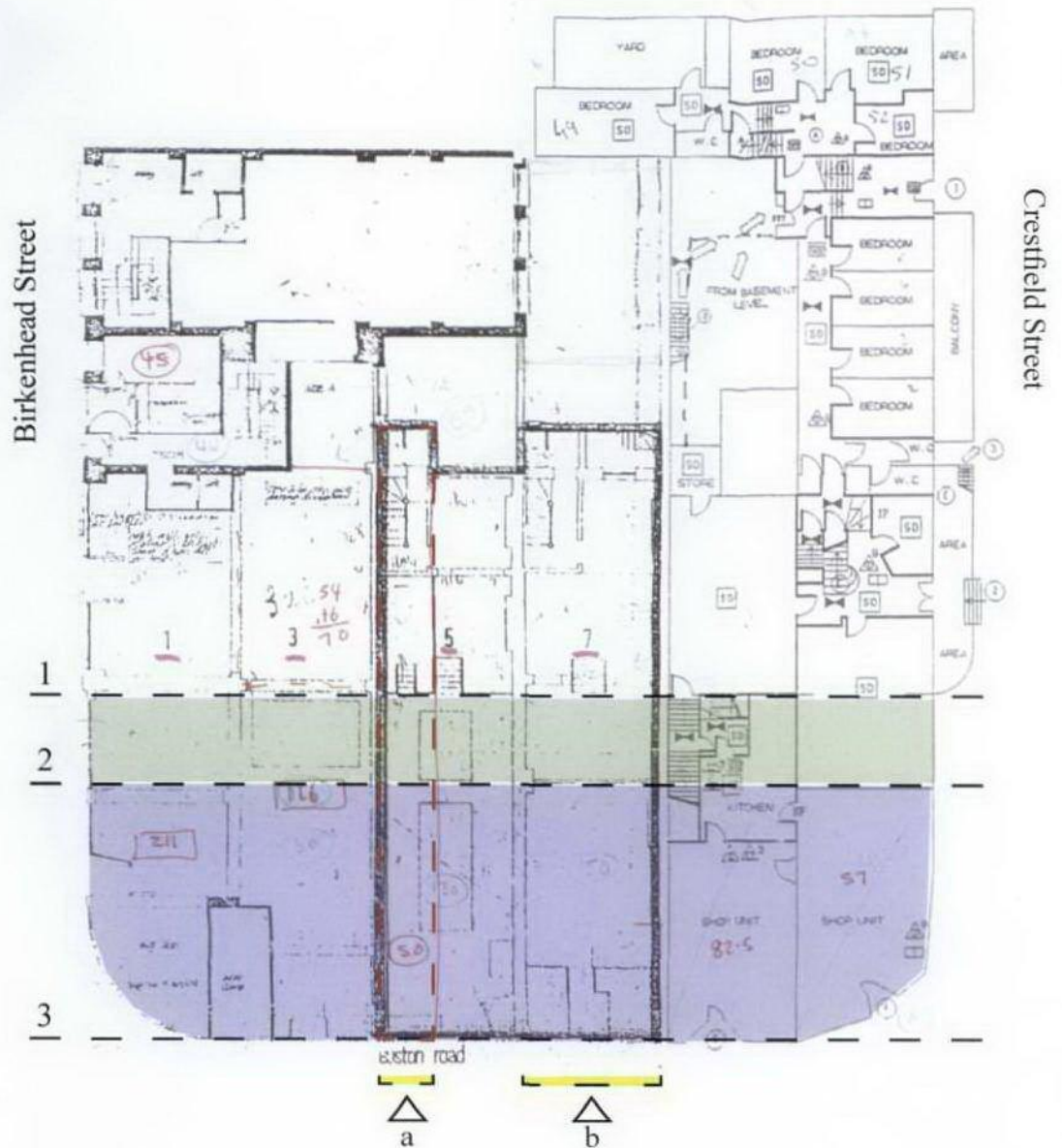
1934 - 1940

## 10. Appendix 4: Analysis of Historic Development



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT



No 1	No 3	No 5	No 7	No 9	No 11
------	------	------	------	------	-------

Existing Situation No's 1-11 Euston Road - Ground Floor

1 - Original Front Wall



1-2 - Original lightwell to ground floor



2-3 - Basement vaulted rooms under the pavement



Access to floors above ground floor for No 5



Access to floors above only through shop

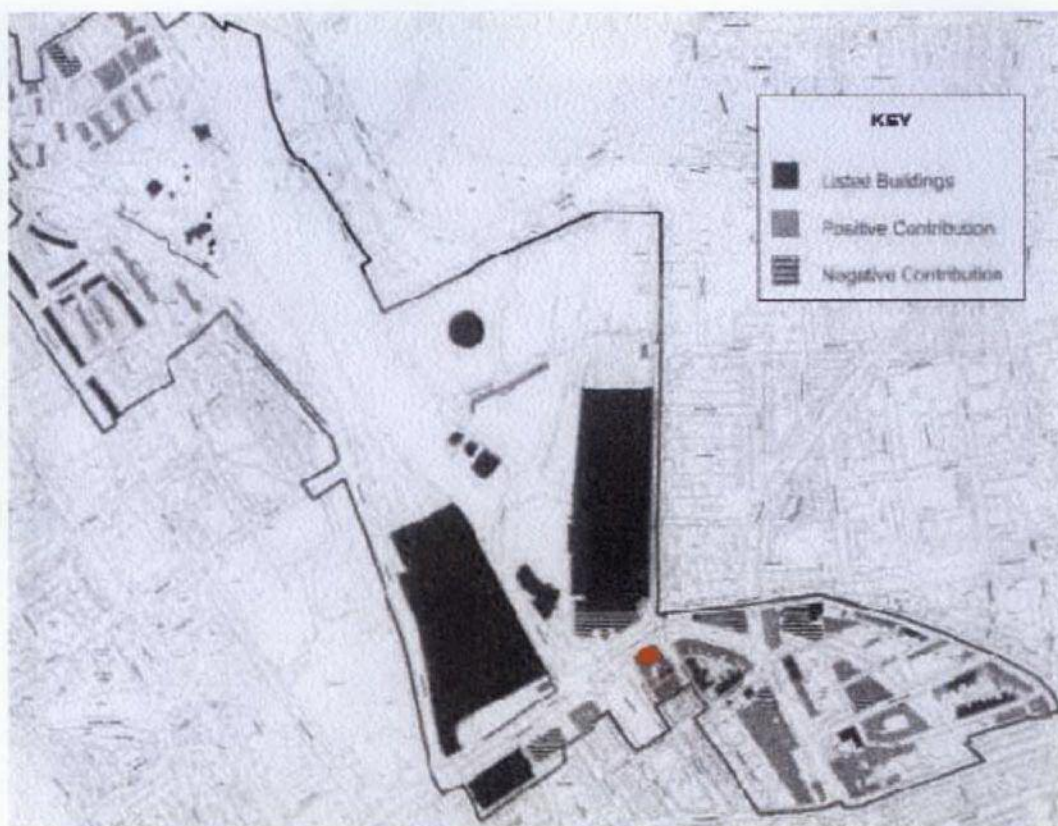


## 10. Appendix 5: Kings Cross Conservation Area



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT



Extract from the Council's Appraisal Document

## 10. Appendix 6: Historic Photograph

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

Photo from late 19th - early 20th Century as the horse drawn tram indicates



Extract from Camden Conservation Area Statement 22 - Kings Cross





#### UNLISTED BUILDINGS

In assessing whether or not unlisted buildings make a positive contribution to the special architectural or historic interest of a conservation area, the following questions should be asked:

	CRITERIA	ASSESSMENT
1	<i>Is the building the work of a particular architect of regional or local note?</i>	No (history explained in report).
2	<i>Has it qualities of age, style, materials or any other characteristics which reflect those of at least a substantial number of the buildings in the conservation area?</i>	No (history explained in report).
3	<i>Does it relate by age, materials or in any other historically significant way to adjacent listed buildings, and contribute positively to their setting?</i>	The buildings by virtue of their location are considered to form part of the setting of the Grade 1 listed Kings Cross and St Pancras Stations. Nos. 1-11 Euston Rd relate poorly to the changes in building line and character of Euston Rd that resulted from the construction on the North Side of the two stations in the mid to late 19 <sup>th</sup> century. While adjoining buildings were replaced to reflect changes in the character of the Euston Rd as a result of the new stations. Nos. 1 -11 were badly adjusted in a way that detracts from the original buildings to the acknowledgement of the Council's own document. As such they provide a poor setting for the important listed buildings which are of both National and International importance and a point of arrival from Europe.
4	<i>Does it, individually or as part of a group, serve as a reminder of the gradual development of the settlement on which it stands, or of an earlier phase of growth?</i>	There is no doubt that the comprised appearance of the site is the result of historic phases representative of local change. In this instance, this has been dealt with in a way that detracts from the qualities of an earlier phase, irreversibly so.
5	<i>Does it have a significant historic association with established features such as the road layout, building plots, a town park or a landscape feature?</i>	No (history explained in report).
6	<i>Does the building have landmark quality, or contribute to the quality of recognisable spaces, including exteriors or open spaces within a complex of public buildings?</i>	No (history explained in report).
7	<i>Does it reflect the traditional functional character of, or former uses within the area?</i>	No (history explained in report).
8	<i>Has it significant historic associations with local people or past events?</i>	No (history explained in report).
9	<i>Does its use contribute to the character or appearance of the conservation area?</i>	Mix of uses add to vitality but the buildings which contain those uses are in need of significant modernisation / refurbishment which is not a viable proposition.
10	<i>Is a structure associated with a designed landscape within the conservation area, such as walls, terracing or a minor garden buildings, is it of identifiable importance to the historic design?</i>	No

## 10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

### Euston Road South Side - The Conservation Area



1 The Town Hall, 1934-7, Grade II Listed



2 The Town Hall Annexe, 1974



## 10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

### Euston Road South Side - The Conservation Area



3 Argyle House, 1950's



4 No's 23-27, 1930's (taken on 10th March 2006)

## 10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT



5 No's 23-27, 1930's (taken on 11th October 2008)



6 No's 13-21, 1930's



## 10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

7



8



9



## 10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

### Building Details at Rear



10

11





## 10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

### Context - St Pancras conservation area and listed buildings



12



13 Kings Cross Station with proximity to 1-11 Euston Road

10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT





## 10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

### Surrounding Streets - Birkenhead Street



15



16



17



## 10. Appendix 8: Photographic Documentation



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT

### Surrounding Streets - Crestfield Street



18



19



## 10. Appendix 9: Bloomsbury Conservation Area Map 1832



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT



Extract from the Bloomsbury Draft Conservation Area Statement of LB Camden

### LEGEND

- 1-11 Euston Road (Also refer to Appendix 1)

## 10. Appendix 10: Minutes of Meeting with Camden of 02/02/2007

---



1-11 EUSTON ROAD,  
LONDON

DEMOLITION  
STATEMENT



# Pre- Camden meeting report

Meeting Date: 02/02/2007

**Lead officer for Camden:** Stuart Minty (Development Control – South Area Team)

## **Other Camden/External officers attending:**

Hannah Walker (Conservation and Urban Design)  
Louise Drum (Conservation and Urban Design)  
Rob Farnsworth (Forward Planning/Policy)  
Stewart McKenzie (Transport Policy)  
David Braine (Transport for London)

## **Applicant(s)/Agents(s) attending:**

Nigel Bennett (Metropolis PD)  
David Symonds (Metropolis PD)  
Kathy Bird (Kings Cross Methodist Mission)  
Bill Greensmith (Bill Greensmith Architects)

## **Applicant name and address:**

Metropolis PD  
The Royle Studios  
41 Wenlock Road  
LONDON  
N1 7SG

## **Site(s) address:**

Site 1: 1-11 Euston Road, London, NW1 2SA

Site 2: Kings Cross Methodist Church, 58A  
Birkenhead Street, London, WC1H 8BB

## **Proposal(s)**

### **Site 1:**

Demolition of existing buildings and redevelopment to provide a 7 storey building, plus basement to facilitate retail (Class A1) at ground floor level, a 190 bed hotel (Class C1) on the upper floors and associated facilities at ground and basement level.

### **Site 2:**

Provision of new church/outreach centre at ground and basement level with student housing, market housing and affordable housing on the upper floors.



## Principal issues discussed at our meeting

### Listed Buildings, Conservation Areas, and Design Concepts/Synopsis

#### **Conservation Area Status**

The site is located within the King's Cross Conservation Area and the four storey terrace is designated as making a positive contribution to the Conservation Area within the King's Cross Conservation Area Statement (Para. 4.2.101). Any proposal would be considered against Replacement UDP Policy B7.

#### **Previous Advice/Meetings**

This advice follows the Council's previous note on a scheme relating to 'Site 1' in August 2005. Council officers raised specific objection to the loss of the existing four storey terrace buildings, and also to the scale, bulk and mass of the replacement scheme. No objection was raised to the removal of the single storey flat roofed retail units added to the front of the properties. The scheme has been subsequently revised and now incorporates 'Site 2' into its proposals.

Officers consider that the scheme has not progressed in line with the previous advice note, with the revised scheme showing little discernible response to the Council's previous comments. Notwithstanding the changes which include the incorporation of 'Site 2', much of the design and townscape comments therefore remains similar, and are reiterated in the interests of consistency.

#### **Loss of the existing buildings and PPG15 Considerations**

PPG15 Para 4.25-4.29 gives guidance on buildings within Conservation Areas stating that the desirability of preserving or enhancing the character or appearance of an area is a prime consideration and account should be taken of the part played in architectural/historic interest of the area by the building and the wider effects of demolition on the building's surroundings & Conservation Area as a whole. It goes on to state that there should be a general presumption in favour of retaining buildings which make a positive contribution although the merits of replacement building can be considered.

PPG15 also states that proposals to demolish buildings which make a positive contribution should be assessed against same criteria as listed buildings (Para 3.16-3.19) which are:

- Condition, cost of repair
- Adequacy of efforts made to retain building
- Merits of alternative proposals for the site, including substantial community benefits

The justification submitted so far is not convincing enough to allow demolition of the existing building and additional justification should be submitted with any application. The information submitted in connection with the initial meeting, remained unchanged following the Council's first advice note and it is imperative that further work is undertaken in connection with the above PPG15 considerations. The documentation should also include justification for the demolition of the Church buildings on both Crestfield and Birkenhead Street.

#### **Merits of the Replacement Building**

The site is at a nodal point with views and vistas in many directions, with

<p><b>Land Use</b></p> <p><b>Listed Buildings, Conservation Areas, and Design Concepts/Synopsis (Continued)</b></p>	<p><del>the buildings on this side forming a continuous backdrop</del> for the landmark buildings to north and an enclosure to the open space created by Euston Road and forecourt to Kings Cross and the proposal must have regard to its surroundings, in particular, neighbouring listed buildings in accordance with replacement UDP Policy B6.</p> <p>The replacement building proposal would be significantly higher than the existing building on all elevations and would be far larger than the adjacent properties on Euston Road and the side streets. The revised scheme is both materially larger and bulkier in comparison to the previous scheme and therefore fails to take account of the previous comments.</p> <p>Such significant jumps in height would detract from existing continuity of height and scale. Furthermore, views from the side streets towards the listed station could be dominated by the proposed increase in height. In addition, the mass has been brought right to front of site possibly overhanging the footway which would obscure views at upper levels and at street level along Euston Road in both directions and is unlikely to be acceptable.</p> <p>The proposal should be set back to respect the existing building line, and reduced in height. A sheer elevation to 4 storey height would be appropriate and any additional floors would need to be stepped back to reduce massing. The current proposal does make some attempt to step down in height mainly on the Crestfield Street elevation, however the relationship between the Euston Road frontage buildings and the neighbouring buildings on the side streets, most of which are listed, still fail to respect the setting of adjoining and nearby listed buildings and the character and appearance of the conservation area.</p> <p>The proposal gives no reflection of smaller plot widths prevalent in the area responding instead to large blocks further west. Whilst this may be acceptable, more information on the level of detailing to break up mass and articulation of the elevations and the use and flexibility of ground floor units would be required before detailed advice could be given.</p> <p>The introduction of the 'church' site would cumulatively add bulk to scheme particularly on Crestfield Street where the profile of the building would reach 5<sup>th</sup> and 6<sup>th</sup> floor level. The scale and bulk proposed in this respect is considered unacceptable, and a roof form which proposed three storeys with a traditional mansard roof extension aligning with that of the neighbouring properties may be a more appropriate architectural response. As per above, no detail has been provided into the make-up of the ground floor elevation treatment, and this would be required before detailed advice could be provided.</p> <p><b><i>Location of a hotel use</i></b></p> <p>The site is located within the Central London Area and is therefore considered to be an appropriate location for a hotel use (Class C1)</p> <p><b><i>The location of retail, bar and leisure uses</i></b></p> <p>As previously stated in the previous advice note the addresses within Euston Road are within a Central London Frontage. On this basis the site is considered an appropriate location for uses in the "A" group of use classes at ground and basement level (policy R1). More detailed aspects of the impact and balance between retail uses is given by policies R2, R3 and R7. The Central London SPG 2004 indicates that no further food,</p>
---	--

**Land Use  
(Continued)**

drink and entertainment should be developed in the eastern part of the frontage (east of Camden Town Hall), to comply with policies R3 and R7.

There are 2 food and drink premises on the frontage at present (with unknown floorspace breakdown), of 6 units in total (counting the double-fronted Ladbrokes as 2 units). The Council would seek to ensure that the proposed retail units were tied to a specific class or classes such that no more than one-third of the frontage length was in any uses in A3, A4 or A5 class. Exact details including a floorspace breakdown; whether the gym/leisure uses have internal and external entrances, and whether they are ancillary to the Hotel use should be included within the planning submission.

A direct entrance is proposed to the basement bar/ restaurant area from Crestfield Street. This may be acceptable given that the facing premises in Crestfield Street are commercial. However, the extent to which non-residents would be encouraged to use this entrance needs to be considered, along with community safety consideration i.e. steps into a lightwell.

The Central London SPG specific to this part of Euston Road makes reference to local street crime and disorder problems (Para 14.39) and to the unacceptable cumulative impact of food and drink uses. In the SPG, the frontage is marked as 'wrapping around' the Euston Road/ Crestfield Road corner, although the current shop frontage terminates within the single storey front extension.

Given policy C3 on location of leisure facilities, the establishment of a basement spa and gym accessed from the north end of Birkenhead Street is likely to be acceptable even if it is not ancillary to the hotel, however, again the same community safety/access concerns may arise from steps into a lightwell.

***Loss of Office Accommodation***

The development would result in the loss of 666 sq m of B1a Office floorspace (although it is unclear whether this may be ancillary to the existing hotel use). Replacement UDP policy E2 seeks to retain existing employment uses on sites that are suitable for those uses to continue, with an exception in certain circumstances with replacement by residential or community use.

In terms of retention, the existing office space is only likely to only be suitable for office purposes, rather than other industrial use designations, as does not have features that would create flexibility for other business uses, e.g. level access or off-street loading. The property does not fall within the 50-120 sq m generally considered suitable for small businesses, The current supply of office space is thought to be plentiful, and there is no reason to suppose that the loss of this office space would put pressure on other land uses. Given the aforementioned policy considerations the potential loss of this employment floorspace is not considered to conflict with UDP policy.

***Mixed use policy SD3 and scale of residential proposal***

The breakdown of the residential uses is not entirely clear, but for the purpose of proceeding, calculations here are based on the prospective applicant's submitted figures.



**Land Use  
(Continued)**

**Residential  
Policies**

The church is proposed to increase in size from 946 sq m to 1,670 sq m, therefore resulting in an uplift of 724 sq m. There is no specific exemption from SD3 for the D1 use class, but places of worship are recognised in UDP Para 8.2 as community uses. Policy SD3 criteria (d) also notes that the Council will have regard to whether additional floorspace is needed for an existing user. Consequently, for the purposes of this calculation, the 50% 'target' in SD3 is not applied to the uplift in church floorspace.

Non-residential floorspace increase excluding church: The existing floorspace is 3,503 sq m, and this is proposed to increase to 7,658 sq m (submitted total 7,673 sq m), resulting in a 'commercial' uplift of 4,155 sq m. NB - The submission has another 15 sq m in the proposed hotel basement, which creates a small discrepancy in the figures.

The residential uplift is to form 50% of total uplift, and will therefore be required to match the commercial uplift at 4,155 sq m. The uplift is proposed as follows:-

- Student element existing (with warden) 558 sq m, proposed 527 sq m = loss of 31 sq m
- Other housing existing (as stated) 248 sq m, proposed 1,960 sq m, = uplift of 1,712 sq m
- The total residential uplift is therefore 1,681 sq m
  
- The total uplift is therefore 11,815 sq m less 5,255 sq m = 6,560 sq m (submission has 6,575 sq m). This results in the residential proportion of the total uplift being 25.6%
- If the church uplift is removed then the total uplift would be 4,155 sq m + 1,681 sq m = 5,836 sq m. This would result in the residential proportion being 28.8%

Notwithstanding the church floorspace, this is a very long way short of the 50% target set out in SD3. You are advised to consider this shortfall with respect to the criteria set out in policy SD3. Possible considerations might include:-

- the extent to which the size of the hotel is determined by the critical mass required to enter a particular market;
- the extent to which the site area is compromised by achieving other planning benefits (the widening of Euston Road at a pinch-point);
- any other planning benefits which can only be achieved by favouring hotel expansion over residential expansion.

***Protecting existing housing***

Policy H3 protects all existing housing floorspace. Policy H9 resists the loss of hostels without replacement. Given these policies, it is clear that re-provision of existing housing does not offset the aim of policy SD3 to seek a additional housing as a proportion of floorspace increases in the Central London Area.

There is in an overall increase in housing, but a significant reduction in the number of student rooms, and a small reduction in the hostel floorspace. Given the extent of recent proposals to increase the amount of student housing in the Bloomsbury area, It is unlikely that Council officers would raise objection to the loss of 31 sq m of student accommodation.

**Residential  
Policies  
(Continued)**

The warden's unit is effectively absorbed into the proposed RSL housing, which would seem to be reasonable given that a warden's flat would not usually be necessary for such a small number of students.

***Affordable housing***

Policy H3 sets a target of 50% affordable housing in schemes of 15 units or more, interpreted in Para 2.23 to include schemes of 1,500 sq m. By virtue of Para 2.19, this policy is not applied to student accommodation which is secured in such a use, usually by S106.

As a guideline, policy H2 proposes a split within affordable housing of 70% social rented housing and 30% intermediate housing; however in negotiations the Council normally favours social rented housing.

Other than the student element, it is understood that the housing proposed is all social rented. This is considered to be appropriate in terms of UDP policy H2 and Para 2.18. The difference in scale between the large Crestfield Street block and the modest Birkenhead Street block would mean that 30% intermediate would be unlikely to be achieved in the smaller block. Nevertheless, placing each block into a separate tenure-type would be acceptable in principle.

***Combination of mixed-use and affordable housing policies***

If the Council's preference for 50% of uplift as residential was achieved by introducing residential space in place of hotel space, the affordable housing achieved would be 1,459 sq m (i.e. 25% of total non-church uplift of 5,836 sq m).

If the 50% preference was achieved by introducing additional floorspace overall, the affordable housing achieved would be 2,077.5 sq m (i.e. 50% of a match for the commercial uplift of 4,155 sq m). The affordable housing proposed (from the schedule) totals 1,960 sq m, which is between the two figures, and 117.5 sq m less than the higher 'target' amount if no reduction in hotel space occurred.

117.5 sq m is sufficient for 2 small family dwellings or one very large family dwelling. The Council may find this shortfall in affordable housing (measured against the higher 'target' outcome) acceptable if an appropriate payment in lieu is made towards provision elsewhere, or if it is persuaded that the quality of the social rented units is sufficient to overcome a relatively small floorspace under provision on-site. The creation of an entirely social rented scheme may assist in this respect.

***Mix of units***

UDP Policy H8 seeks a mix of large and small units. Para 2.61 emphasises the importance of large units. Camden Planning Guidance adopted in December 2006 seeks a social rented mix involving at least 50% units with 3 bedrooms or more, and 30% with 2 bedrooms.

It is noted that no amenity space is available on site, but the proposal is extremely close to Argyle Square.

From the schedule, 16 units are proposed, with 2 x 1-bedroom (12.5%), 10 x 2-bedroom (62.5%) and 4 x 3-bedroom (25%). Compared with SPD guidelines, this is an over-provision of 2-bedroom units relative to 3 bedroom units. 2-bedroom units tend to become overcrowded, with children sharing a single bedroom. However, a higher proportion of 2-

**Open Space**

**Residential  
Policies  
(Continued)**

bedroom units can be favourably received in a high density situation where they provide two double-bedrooms, and are therefore appropriate for a family with two young children. It would appear that all units have a combined kitchen and living space. This is not considered appropriate for some Muslim families; however it may be unavoidable given the constraints of the site. The unit mix may be acceptable, subject to room sizes and the comments of Camden Housing and Adult Social Care.

***Internal space and room sizes***

All unit sizes should meet the minimum space standards being 32m<sup>2</sup> for 1 person units, 48m<sup>2</sup> for a 2 person unit and 61m<sup>2</sup> for a 3 person unit. The Council's SPG (Camden Planning Guidance) also states the Council's minimum sizes for bedrooms. These are as follows: Main Bedrooms - 11.0m<sup>2</sup>; Other double bedrooms - 10.5m<sup>2</sup>; Single Bedrooms – 6.5m<sup>2</sup>.

Each dwelling in a development should have at least one habitable room with a window facing within 30 degrees of south. Rooms on south facing walls should always have windows. South facing windows and walls should be shaded in summer to prevent overheating. External shading should be provided for western facing windows and outdoor spaces to minimise overheating in summer. Windows on north facing walls should be the minimum allowable under other guidance to prevent heat loss. All habitable rooms, including basements, must have an external window with an area of at least 1/10 of the floor area of the room. An area of 1/20 of the floor area of the room must be able to be opened to provide natural ventilation. Windows to atriums will be acceptable as external windows in exceptional circumstances only.

***Lifetime Homes and Wheelchair Housing***

Replacement UDP policy H7 requires all new residential developments to be accessible to all. In addition the Council's SPG (Camden Planning Guidance) 2006, provides advice on assessing the adequacy of dwelling and room sizes. The policy requires all new housing should be built to 'Lifetime homes standards and 10% of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Full details of such measures should be included within the applications access statement.

***Policy Context***

The development is likely to lead to an increased use of public open space. Policy N4 of the replacement UDP states that developments providing 1,000m<sup>2</sup> or more of floorspace where such developments would increase the resident, worker or visitor populations of the borough; or residential schemes of 5 or more dwellings are required to contribute to the supply of public open space.

This policy requires the provision of 9sqm of open space per person and the Council's preference is for this to be achieved on site. It is appreciated that in Central London locations this is usually not feasible. The contribution can come from creating new public open spaces, improving access to public open spaces, making existing private open space publicly accessible, improving the quality of existing public open space or providing a payment in lieu.

***Financial Undertaking***

It is likely that the development in question would be required make a

## Amenity

~~financial undertaking in lieu of on-site provision by way of a planning obligation.~~ The contribution is calculated on a formula basis, details of which can be found in the Camden Planning Guidance.

### **Noise and Disturbance**

As per the previous meeting, officers noted the need for a comprehensive noise acoustic assessment from the location of plant/machinery. At minimum this should include details of existing background noise levels, and whether the scheme would comply with Camden's noise standards in relation to nearest noise sensitive facades (5-10db below background levels) e.g. residential properties. Any means of attenuation or isolation necessary to ensure that the residential units are not compromised by the existing plant (e.g. acoustic screens), and detail of any calculations used in order to determine whether proposal complies should also be provided. The acoustic report should address the cumulative noise levels of all the proposed and existing units.

Further details of what would be required can also be obtained from the Council's Environmental Health Department on 0207 974 2090.

### **Overlooking**

Replacement UDP Policy SD6 aims to ensure developments avoid harmful effects on amenity. The Council's records indicate that the site is bound to the south by the location of properties with residential components. Contextual drawings or photographs of the residential windows/general arrangements of neighbouring properties adjoining/surrounding to the site have not been provided, and therefore no view can be taken on the effects of overlooking.

Obscure glazing and screening by walls or fencing should be considered where appropriate. In order to ensure privacy, there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other. This minimum requirement will be the distance between the two closest points on each building (including balconies) and will be applied to proposals for new build housing. Guidance on the Council's standards for overlooking can be found within the Camden Planning Guidance 2006.

Other publications of relevance include:-

- 'Better Places to Live: By Design - A companion guide to PPG3' (ODPM) makes number of design recommendations which recognise the importance of privacy in the home.
- 'Perceptions of Privacy and Density in Housing' report available from Design for Homes; telephone 0870 416 3378 or [www.designforhomes.org](http://www.designforhomes.org)

### **Daylight and Sunlight**

An application should be accompanied by a comprehensive sunlight and daylight report, which would investigate the acceptability of the proposals on all neighbouring properties and also the level of the supply of light and outlook to the proposed dwellings.



<p><b>Development and Construction Waste</b></p> <p><b>Design and Sustainability</b></p> <p><b>Biodiversity</b></p>	<p>UDP policy N5 expects schemes to have considered conserving and enhancing biodiversity, including by creating wildlife habitats. These measures include the use of green and brown roofs, the provision of nest spaces and boxes that meet the need of specific species and by planting species. It is considered the proposal has potential to incorporate several of these measures, particularly on the roof of the building and details of these initiatives should be submitted with the application.</p> <p>The development triggers a request for a BREEAM sustainability assessment for the non-residential component and an EcoHomes assessment for a residential element of over 10 units (SPG Para 1.3.15). Requests for BREEAM assessment now have the backing of the Replacement UDP Para's 1.64 and 3.16. Details can be found on the BREEAM website <a href="http://www.breeam.org">http://www.breeam.org</a></p> <p>The Council generally seeks a minimum BREEAM and EcoHomes ratings of "Very Good". An application should be accompanied by a pre-assessment carried out by a qualified BREEAM assessor. It is then necessary for planning conditions or a S106 to ensure submission of a full BREEAM/ EcoHomes assessment confirming the "Very Good" rating prior to the implementation date.</p> <p>Policy SD9 of the UDP also requires developments to demonstrate that adequate provision can be made for water supply and waste treatment. The Council requires developers to include measures to conserve water and where appropriate incorporate Sustainable Urban Drainage Systems. It would also be necessary to demonstrate how the development would conserve energy and resources through a) designs for energy efficiency; b) renewable energy use; c) optimising energy supply; and d) the use of recycles and renewable building materials.</p> <p>Further to the BREEAM and EcoHomes requirements the Camden Planning Guidance also requires minimum individual performance ratings of 60% energy credits, 60% water credits, 40% materials credits, attention to water run-off attenuation and attention to biodiversity).</p> <p>Developers are required to demonstrate the energy demand of their proposals and how they would generate a proportion of the site's electricity and heating needs from on-site renewables with a minimum requirement of 10%. An assessment under the 'Integrating renewable energy into new developments: Toolkit for planners, developers and consultants' by London Renewables is expected. For further information see the GLA website.</p> <p><a href="http://www.london.gov.uk/mayor/environment/energy/renew_resources.jsp">http://www.london.gov.uk/mayor/environment/energy/renew_resources.jsp</a></p> <p>Replacement UDP policy SD12 requires that adequate provision be made for the sorting and storage of waste materials. Refuse storage space should be sufficient to accommodate the necessary containers (including recyclables).</p>
---	---

## Servicing and Access

### ***Footprint of the building and TFL requirements.***

Euston Road is a Strategic Red Route and Transport for London would be consulted as highway authority and the building line will be subject to their control. The Greater London Authority will also need to be consulted if the proposed hotel exceeds 200 bed spaces.

It is noted that Transport for London requires the kerb line to be set back by 3 metres to gain an additional running lane. This will require the building line to be set back which is shown on the plans. Transport for London also requires a 4 metre wide footpath in front of the development on Euston Road. The plan shows that the first floor building line will overhang the footway by 1.5 metres and this will require an overhang licence. You are advised to contact David Braine at TfL to discuss such arrangements.

A full transport assessment is required to be submitted with the application. The transport assessment will need to include trip generation for pedestrians as well as vehicles

### ***Car Free Designation***

The development would be required to be 'car free' and therefore the owner/occupiers would not be entitled (unless they are the holder of a disabled persons badge issued pursuant to Section 21 of the Chronically Sick and Disabled Persons Act 1970) to be granted a Residents Parking Permit to park a vehicle in a Residents Parking Bay and will not be able to buy a contract to park within any car park owned, controlled or licensed by the Council.

### ***Cycle parking/storage***

The replacement UDP sets this to a minimum of 1 secure cycle storage space per residential unit, with 1 additional cycle to be provided for visitors for each 10 residential units or part thereof. In light of the number of family units and 2 bedroom units proposed a standard of 2 spaces per unit would be sought. Further details of the requirements for A1-A5 and C1 uses can be obtained in Appendix 6 of the Replacement UDP. All cycle spaces must be provided within the curtilage of the site in a secure and but appropriately accessible location. Further on-street cycle parking could be provided, with a contribution as part of the s106 agreement dealing with this.

### ***Highway Implications on Design***

The design of the site on the highway frontages should not include any recesses or areas of poor visibility. Where possible it would be ideal to reduce window heights to improve natural surveillance. No doorways to open outwards onto the footway and this would be required to be shown on the design drawings. Details would be required to show how the retail activity would be serviced.

### ***Highway Related Planning Obligations***

#### **Construction Management Plan**

A poorly thought out approach to how the work will be carried out and how the construction work will be serviced (e.g. delivery of materials, set down and collection of skips), could lead to unacceptable traffic disruption and

## **Servicing and Access (Continued)**

create dangerous situations for pedestrians and other road users.

A construction management plan will need to be submitted and approved before any works start on site, and approval should be reserved by condition. The detail of the Construction Management Plan will relate to the scale and kind of the development, however, in terms of assessing the impact on transport it should include the following:

*(Note the term 'vehicles' used here refers to all vehicles associated with the implementation of the development, e.g. demolition, site clearing, delivering of plant & material, construction...)*

- a) The access arrangements for vehicles.
- b) Proposed routes of vehicles to and from the site.
- c) Sizes of all vehicles and the schedule of when they will need access to the site.
- d) Swept path drawing for the vehicle routes for all vehicles sizes.
- e) Details (including accurate scaled drawings) of any highway works necessary to enable construction to take place.
- f) Parking and Loading arrangement of vehicles and delivery of materials and plant to the site.
- g) Details of proposed parking bays suspensions and temporary traffic management orders.
- h) Proposed overhang (if any) of the public highway (scaffolding, cranes etc.)
- i) Details of hording required on the public highway
- j) Details of how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.
- k) The proposed working hours.
- l) Start and end dates for each phase of construction.
- m) Details of how traffic associated with the development will be managed in order to reduce congestion.
- n) Details of any other measure designed to reduce the impact of associated traffic (such as the use of construction material consideration centres).
- o) Any other relevant information.

### Servicing Management Plan

The way a site is serviced can have an impact on transport in terms of causing obstructions and possible dangerous situations. Details of arrangements for things such as deliveries refuse storage and collection and any other traffic associated with servicing the site will need to be submitted and approved before any works start on site, and approval should be reserved by condition.

A service management plan is aimed at managing the deliveries and servicing of the scheme, with the objective of minimising the impact of service of service vehicles deliveries and mitigating environmental effects. The detail of the Servicing Management Plan will relate to the scale and kind of the development, however, in terms of assessing the impact on transport it should include the following:

- a) Location and layout of servicing bays (drawings to be submitted).
- b) Likely frequency and duration of serving movements.
- c) The sizes of service vehicles proposed to enter the site.
- d) Swept paths should be provided to ascertain manoeuvring within the site.

**Servicing and  
Access**

- e) Delivery vehicles should have a sufficient turning area to be able to both enter and exit the site in a forward gear. This will need to be demonstrated by swept paths.
- f) Nature of goods to be delivered.
- g) Route to and from on-street servicing bays to the building/service access where relevant.
- h) Statement setting out how pedestrian and highway safety will be maintained during servicing movements;
- i) Statement setting out how servicing movement to the site can be combined and/or reduced to minimise traffic and service vehicle activity at the site.
- j) A detailed statement outlining how on-site servicing bays will be organised and managed.
- k) If on-street servicing is intended, a detailed statement giving reasons why this is necessary/reasonable and how it is expected to impact on safety and the operation of the public highway.
- l) Details of arrangements for refuse storage and servicing.
- m) Any other relevant information.

A residential travel plan would be required via a S106 obligation. This should include travel information provision, cycle information and encouragement, walking maps and safer travel at night information.

The applicant will be required to make a financial contribution secured via planning obligation towards local area street and pedestrian improvements given the additional pedestrian traffic the combined uses will generate.

A contribution will be sought of £6,000 towards the Council's Legible London pedestrian signing initiative via a S106 agreement.



## Planning Obligations under Section 106 of the Town and Country Planning Act 1990

Following our preliminary assessment of your proposal, if you submit a planning application which addresses outstanding issues detailed in this report satisfactorily, officers would only consider recommending the application for approval subject to completion of a Section 106 agreement covering the following head(s). of term. See notes at appendix A

Payment of the Council's legal and other professional costs in: a) Preparing and completing the agreement, and b) Monitoring and enforcing its compliance	
Education Facilities and Contributions	A financial contribution would be required towards education provision within the Borough. This will only be required on the market housing, as student and affordable units are exempt from education contributions.
Open Space	The scheme would introduce a large residential population with substandard on-site provision for open space. In accordance with UDP policy N4 a contribution to improve open space would be required. Details of such contribution can be calculated using the Camden Planning Guidance.
Student Occupation	Occupation of the student units to be restricted to students in full or part-time higher education and not to be sold as a separate self-contained unit.
Affordable Housing	You are advised to contact Michael Cox (0207 974 5564) of the 'Housing Initiatives and Regeneration' department regarding affordable housing contributions.
Residential Travel Plan	As per the above comments. This should include travel information provision, cycle information and encouragement, walking maps and safer travel at night information. For further information please contact Sam Longman (0207 974 5956)
Construction Management Plan	This would need to be prepared and approved prior to any works commencing. For further information please contact Sam Longman (0207 974 5956)
Servicing Management Plan	This would need to be prepared and approved prior to any works commencing. For further information please contact Sam Longman (0207 974 5956)
Highways works	A financial contribution towards local area street and pedestrian improvements given the additional pedestrian traffic the combined uses will generate. For further information please contact Sam Longman (0207 974 5956)
Car Free Housing	A car-free housing agreement would be required given the large numbers of residential units and lack of parking in the vicinity (non compliance with UDP policy T7).

London's Pedestrian Signing Initiative

A contribution will be sought of £6,000 towards the Council's Legible London pedestrian signing initiative. For further information please contact Sam Longman (0207 974 5956)



## Consultation

You are strongly advised to make early contact with the following organisations/groups: -

### **English Heritage**

Please contact Zoe Croad/Richard Parish, 1 Waterhouse Square, 138-142 Holborn, London, EC1N 2ST: Tel: 0207 973 3000; Email: [Zoe.Croad@english-heritage.org.uk](mailto:Zoe.Croad@english-heritage.org.uk) / [Richard.Parish@english-heritage.org.uk](mailto:Richard.Parish@english-heritage.org.uk); to discuss the demolition implications of the unlisted buildings within the conservation area and the merits of the replacement scheme.

### **Crime Prevention Design Advisor (Metropolitan Police) –**

Please contact Terry Cocks, Camden Police Headquarters, 10 Lambs Conduit Street, London WC1N 3NR, Tel 0207 404 1212 to discuss issues of security, layout, lighting, CCTV, doors, windows etc.

### **Kings Cross Conservation Area Advisory Committee (CAAC) –**

Please contact the committee at 19 Gloucester Crescent, London, NW1 7DS

### **Bloomsbury Conservation Area Advisory Committee (CAAC)**

Please contact Tony Tugnut, The Gatehouse, Burton Street, London, WC1H 9BY. Email [bcaac@britishlibrary.net](mailto:bcaac@britishlibrary.net) : Tel - 0207 383 7886

It would be helpful as part of your submission if you could set out what public consultation you have carried out, what comments have been received and how your proposal has been amended in response to such comments.

## Submission of a valid planning application

To submit a valid planning application you will need to provide all the information and plans set out in the attachment to this letter. In addition, you should submit the following statements, showing how far your proposal meets Camden's policies and guidance:

Supporting Planning Statement	
Access statement including details of Lifetime Homes/Wheelchair Housing	
<p>Design Statement. This should include:-</p> <ul style="list-style-type: none"> <li>Context study: The context study should form the first part of a design statement that will be required for any submission. It should include reference to the King's Cross CA and the surrounding buildings including Kings Cross station</li> <li>The second part of the statement should present your design and justify your design approach. It should make clear reference to your context study and our design policies.</li> <li>The site is in the wider setting or a strategic view from Parliament Hill to St Paul's Cathedral, and the relevant drawing should be submitted to show the replacement building would not infringe upon such views.</li> <li>An appendix of all the drawings at A3 would also be useful.</li> </ul> <p>Drawings:-</p> <ul style="list-style-type: none"> <li>'True' and 'Non-True' elevations so it can be understood what will appear on each elevation.</li> <li>Model/axonometric drawings so it can be understood the bulk and massing fully. These drawing should include surrounding buildings</li> <li>Long and short views</li> </ul>	
Conservation Area/Historic Buildings appraisal/PPG15 Justification	
Historical and Archaeological assessment	
Crime Prevention Statement	
Retail assessment	
Transport Assessment	
Sustainability appraisal including BREEAM and EcoHomes pre-assessment	
Energy statement	
Noise Impact assessment (If plant/machinery proposed)	
Sunlight/daylight assessment	
Photographs/photomontages/contextual images	
Biodiversity Appraisal	



### Validation checklist – for ALL applications for planning permission

Your application **MUST** include the following:

- 1 Original and 4 copies of the completed planning application forms, signed and dated
- 1 Original and 4 copies of the completed signed and dated Ownership Certificate (A, B, C or D) & Article 7 Certificate (Agricultural Holdings)
- If applicable, details of any assistance or advice sought from a planning officer prior to submitting your application – please indicate dates of any correspondence or discussion and name of officer
- 1 Original and 4 copies of the location plan (ordnance Survey based), at a scale of 1:1250 or 1:2500 or larger) or at an appropriate scale to show at least two main roads and surrounding buildings and should show the direction of North.
- The application site should be edged clearly with a red line and a blue line must be drawn around any other land owned by the applicant
- 5 copies of any other drawings required (see application specific checklist)
- The correct fee

### Validation checklist – for FULL planning applications

In addition for a detailed application the following additional plans are required:

- 5 copies of the block plan of the site to a scale of not less than 1:500
- 5 copies of the existing and proposed elevations to a scale of not less than 1:100
- 5 copies of existing and proposed sections and finished floor levels at a scale of not less than 1:100
- 5 copies of existing and proposed floor plans at a scale of not less than 1:100
- 5 copies a site survey plan to a scale of not less than 1:200 showing existing features of the site e.g. walls, trees, buildings and other structures
- 5 copies of a site survey plan at scale of not less than 1:200 showing proposed features e.g. landscaping.



## Validation checklist – Listed Building and Conservation Area Consent permissions

The following additional plans will be required:

- 5 copies of existing and proposed elevations where alterations are proposed to a scale not less than 1:100
- 5 copies of Block Plans to a scale not less than 1:500 showing the boundaries of the site, the position of all existing buildings and the position of new extensions and buildings
- 5 copies of Building Plans to a scale not less than 1:100 including plans of each floor where works are proposed
- 5 copies of sections through the building
- 5 copies of detail plans to a scale of not less than 1:20 to show all new doors, windows, shop-fronts, paneling, fireplaces, plaster molding and other decorative details

In addition to the information that MUST be submitted with your application, the following information may also be required:

- Structural Survey of the building
- Supporting Planning Statement including reasoned justification for the proposed works which may include the submission of a structural survey or other analysis of the character or appearance of the conservation area
- Heritage Statement which analyses the significance of archaeology, history and character of the building/structure, the principles of and justification for the proposed works and their impact
- Design Statement including the type colour, make and name of all materials to be used both internally and externally, including roofing and the surfacing of car parking areas etc
- 5 sets of Photographs – up to date photographs showing the whole building and its setting and/or the particular section of the building affected by the proposals.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries in relation to the above matters do not hesitate to contact me.

Stuart Minty

Senior Planning Officer

South Area Team – Development Control



### Section 106 agreements

Depending on the nature of the submitted scheme planning obligation requirements are supported by relevant policies of the adopted Unitary Development Plan and supplementary planning guidance. Council policy in respect of these areas is available on the Councils website at [www.camden.gov.uk/planning](http://www.camden.gov.uk/planning) which has links to the supplementary planning guidance adopted in 2002. This explains in more detail the circumstances of why a planning obligation may be required.

The legal agreement under S.106 would be enforceable by the Council, and bind you and any successors in title. Your intention to agree to the heads of terms will be a matter that the General Purposes (Development Control) sub Committee will take into account when considering your application. So that we can correctly inform the Committee of your intentions, you will need to confirm agreement to the heads of terms, and the Agreement itself will need to be prepared at risk prior to your application being presented to the Committee. We will also seek the Committee's agreement to require completion of the legal agreement within a very limited time period, or failing this for the application to be reviewed and possibly treated as withdrawn.

Any Section 106 Agreement must follow the Council's standard form of model agreement, an example of which is contained in the Council's Supplementary Planning Guidance. A template agreement with standard clauses is also obtainable at [www.camden.gov.uk/planning](http://www.camden.gov.uk/planning) where application forms can also be downloaded. The Council will not accept departures from these. For further guidance a "Planning Obligations Information Pack" is also available on request.

The Council's Development Control Sub-Committee will not normally consider an application recommended to be subject to a Section 106(s278) Agreement unless the terms of the Agreement have already been confirmed and agreed in writing. The usual approach is therefore not to report an application to the Sub Committee until the Section 106(s278) Agreement has been agreed in draft and is in a form ready to be executed (subject to any further modification following committee resolution):

We strongly advise that you provide the Council's Legal Services with the following information as soon as possible (before you submit your application).

- (i) Full postcode of the site (in order that relevant title information can be obtained),
- (ii) Details of your legal representative
- (iii) A completed undertaking (see attached) that you will meet the Council's reasonable costs incurred in connection with the agreement, together with a one off payment for monitoring costs (equivalent to £300 per Head of term of the Agreement.) These costs will be payable whether or not the Agreement proceeds to completion.

Once this information has been provided, Camden's Legal Services representative will send your legal representative an initial draft Agreement.

Please also note that your application is likely to be identified as a 'major application' in accordance with the Office of the Deputy Prime Minister's definitions. The Local Planning Authority is required to determine the majority of major applications within a 13-week period from the date of receipt. In order to meet these targets and provide a focussed service Camden Planning Service will be working to tight timescales. We would draw your attention in particular to the very limited scope for amendment once you have submitted the application, and to the need to progress any legal agreement in advance of or concurrently with consideration of a planning application.