



**Westminster Kingsway**  
central London's **College**

**PLANNING STATEMENT  
IN SUPPORT OF**

**PROPOSED EXTENSION  
AT  
WESTMINSTER KINGSWAY  
COLLEGE  
KING'S CROSS CENTRE  
211 GRAY'S INN ROAD  
LONDON, WC1X 8RA**

**10<sup>TH</sup> DECEMBER 2014**

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## 1.0 INTRODUCTION

1.1 This Planning Statement is submitted in support of a full planning application for an extension to Westminster Kingsway College's King's Cross Centre, as follows:

*"Proposed infill extension to create an additional 467 sq m of floorspace for Class D1 education use."*

1.2 The application comprises the following documents:

- (i) Planning application forms and completed Certificate A.
- (ii) Design and Access Statement prepared by Gibberd.
- (iii) Sustainability Statement prepared by Couch Perry Wilkes.
- (iv) Plans as follows:

- 001 OS Location Plan
- 002 Existing Site Plan
- 003 Existing Fourth Floor Roof Plan
- 004 Existing Ground Floor Plan
- 005 Existing First Floor Plan
- 006 Existing Fourth Floor Plan
- 007 Existing Context Elevations
- 008 Existing Westking Place Elevation
- 009 Existing Heathcote Elevation
- 010 Existing Sidmouth Street Elevation
- 011 Existing Section AA
- 012 Existing Sections BB and CC
- 020 Proposed Site Plan
- 021 Proposed Fourth Floor Roof Plan
- 022 Proposed Ground Floor Plan
- 023 Proposed First Floor Plan
- 024 Proposed Fourth Floor Plan
- 025 Proposed Context Elevations
- 026 Proposed Westking Place Elevation
- 027 Proposed Heathcote Elevation
- 028 Proposed Sidmouth Street Elevation
- 029 Proposed Section AA
- 030 Proposed Sections BB and CC

1.3 In addition, a cheque for the sum of £2,695 made payable to the London Borough of Camden is provided in accordance with the planning application fee regulations.

1.4 The Planning Statement addresses the policy issues raised by the application.

## 2.0 RELEVANT BACKGROUND

### Westminster Kingsway College

- 2.1 Westminster Kingsway College (the College/WKC) offers academic and vocational courses at all levels for 14-19 year olds and adult learners, including BTECs, A-Levels, Apprenticeships, Foundation Degrees, Access to HE, Higher Education, Distance Learning, Employability Training and Short Courses, as well as bespoke training for employers and specialist programmes delivered through the Peter Jones Enterprise Academy and WKC Job Train.
- 2.2 The College operates from four primary centres at Victoria, King's Cross, Regents Park and Soho. In addition, the College operates a facility known as WKC Job Train from a Camden Council leased facility in Holmes Road, Kentish Town. The College has operated this provision following the voluntary liquidation of Camden Job Train in 2012.
- 2.3 WKC Job Train provides courses for 14-18 year olds designed to assist progression into work or further learning. Most trainees are residents of Camden, with a high proportion from minority ethnic groups. The Holmes Road Centre provides workshop space for vocational courses including Motor Vehicle Maintenance and Construction Skills.

### King's Cross Centre

- 2.4 This planning application concerns WKC's King's Cross Centre, located on Gray's Inn Road in the heart of Camden. The Centre was constructed pursuant to planning permission 2006/0427/P and opened in 2008. It provides approximately 13,800 sq m of academic and vocational floorspace across five floors, with roof level plant.



Figure 1: King's Cross Centre, Gray's Inn Road

- 2.5 The Centre is in a highly accessible location, with the majority of students and staff arriving by public transport. It is bounded by Gray's Inn Road (to the east), Sidmouth Street (to the north), Heathcote Street (to the south) and Westking Place (to the west). The main pedestrian entrance to the building is on Gray's Inn Road.

- 2.6 To the rear (west) of the building Westking Place operates as a one-way service road connecting Sidmouth Street with Heathcote Street. The road is owned and operated by the College, but provides a right of way for pedestrians and cyclists. The service road provides access to a dedicated service yard, which is contained within a double height void and enclosed by a brick wall.



Figure 2: Service yard and access road viewed from Heathcote Street

- 2.7 Adjacent to the service yard is a landscaped courtyard which operates as the College's social break out area.
- 2.8 Two 4 storey residential blocks, Burleigh House and Beckett House, are located to the west of the service road. These blocks were constructed pursuant to planning permission 2011/0503/P granted in 2011. The principle of residential development on this plot was established through planning permission 2006/0427/P which proposed a mixed use scheme of D1 education and C3 residential in accordance with Camden's policy.



Figure 3: Burleigh House and Beckett House, Westking Place

- 2.9 The site is located within the Bloomsbury Conservation Area. It does not contain any listed buildings, but a number of residential properties close by on Sidmouth Street are listed.

- 2.10 Further west lie St George's Gardens which are on the English Heritage Register of Parks and Gardens of Special Interest. Pedestrian access to the gardens is gained from the end of Heathcote Street or from Sidmouth Street.

### 3.0 THE PROPOSED DEVELOPMENT

- 3.1 The proposed development is described in detail in the Design and Access Statement prepared by Gibberd submitted in support of the planning application. Essentially, it is proposed to infill the rear double height service yard to create a dedicated Mechanical and Electrical Engineering and Construction Skills facility.
- 3.2 The proposed extension will provide an additional 467 sq m GIA (497.5 sq m GEA) of additional education floorspace across two floors.

#### Job Train

- 3.3 The aim of the proposal is to accommodate Camden's Job Train which will be relocating from Holmes Road at the end of the 2014/15 academic year i.e. in July 2015. The provision will include plumbing, carpentry, electrical, brick laying and plastering courses to enable students to gain apprenticeships in these areas and to successfully enter the job market.
- 3.4 Training for those enrolled on Job Train often takes place in small groups. Level 1 and 2 pre - apprenticeship courses are offered, aimed at achieving appropriate qualifications for onward progression. Courses are generally 18 hours per week and include mandatory Maths, English and ICT units as well as work experience. WKC have been working with Camden Council to ensure that on-going provision is maintained and is focused towards market needs.



Figure 4: Existing service yard

#### Design Approach

- 3.5 The proposed development will extend over 2 floors providing 3 workshops accommodating:
- Construction skills workshop of 120 sq m
  - Plumbing level 1 workshop of 124 sq m
  - Electrical level 1 workshop of 90 sq m

- 3.6 In addition, the first floor will accommodate a breakout/support learning area of 95 sq m; and the ground floor will provide 2 internal storage areas and a dedicated covered bin storage area.
- 3.7 In terms of massing, the proposed development would be contained within the double height void and maintain the profile of the existing building. The single storey extension into the service yard would be contained within the existing perimeter boundary wall and would not significantly change the external appearance of this part of the site.
- 3.8 As described in the Design and Access Statement, it is proposed that the extension would be constructed from similar materials to the main building, with a combination of buff coloured brick and rain screen cladding. The aim would be to match the brick as close as possible to ensure a high quality finish.

#### **Servicing, Access and Parking**

- 3.9 No additional car parking or cycle parking is proposed as part of the extension. Adequate disabled parking and cycle parking exists on the site to accommodate the needs of the additional staff and students who would use the facility.
- 3.10 The closing off of the drive-through route through the service yard creates the opportunity of providing an additional on-street car parking bay on Heathcote Street, with the consequential reduction in the length of the crossover at this junction.

#### **Sustainability**

- 3.11 Creating a sustainable building has been integral to the design of the proposed new facility. A Sustainability Statement prepared by Couch Perry Wilkes is submitted in support of the planning application.
- 3.12 The existing King's Cross Centre fulfils a BREEAM 'excellent' criteria and it is the intention that the new extension would not compromise this rating. The proposed development has been assessed against the Lean, Clean and Green criteria contained within the London Plan. Essentially, the thermal envelope has been designed to reduce heating energy consumption by limiting U values and reducing air permeability. Heat recovery has been designed to minimise energy consumption by utilising a mixed mode ventilation system.
- 3.13 There are limited opportunities to accommodate Green measures within the extension, given its integral nature with the main building. A green roof or photovoltaics were not considered appropriate on the limited additional roof area of the extension.
- 3.14 The measures proposed will ensure the extension is more energy efficient than the existing building, constructed in 2006, and it will meet the requirements of Part L of Building Regulations 2013.



### **Deliveries**

- 3.15 At present the College has a number of vehicle movements associated with the functioning of its business at the King's Cross Centre, all of which are essential for the management and running of the building including:
- Catering Deliveries – This service accounts for three deliveries to the site per day.
  - Waste Collection – This service accounts for one collection from the site per day.
  - General Building Management – This service accounts for two deliveries to the site per day.
  - General Curriculum Management - This service accounts for two deliveries to the site per day.
- 3.16 Following the opening of the new Mechanical and Electrical Engineering and Construction Skills facility, in addition to the above requirements, it is anticipated that the following vehicle movements will be required:
- Workshop Stores – It is expected that there will be no more than one delivery to the site per week required to manage and maintain the stock levels to the new facility.

### **Staff**

- 3.17 At present, the College has a maximum of the following numbers of staff and students using the King's Cross Centre facilities at any one time:
- Staff – There are a total number of 309 staff members at the King's Cross Centre.
  - Students – There are a total number of 2,978 students at the King's Cross Centre.
- 3.18 It is anticipated that there will be an increase in both staff and student numbers due to the impact of the proposed new facility, as set out below:
- Staff – It is expected that there will be an additional 7 staff members joining the College to fulfil the curriculum requirements of the new facility.
  - Students – It is expected that there will be an additional 90 students joining the College to make use of the proposed facility.

## 4.0 PLANNING POLICY

- 4.1 The planning application falls to be considered against the National Planning Policy Framework 2012 (NPPF) and relevant policy guidance contained within the London Plan 2011, Camden Core Strategy 2010, Camden Development Policies 2010 and Camden Planning Guidance 2010. Relevant policies are set out in **Appendix 1** and referred to below.

### **New Education Provision**

- 4.2 Planning policies at the national, strategic and local level support the need to provide new education floorspace to meet the requirements of a growing population.
- 4.3 The NPPF provides a presumption in favour of sustainable development. In determining planning applications, the NPPF advises Local Planning Authorities to adopt a positive approach and seek to approve applications for sustainable development where possible. Specifically, one of the core planning principles of the NPPF is to take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.
- 4.4 The need to support new education facilities is continued at strategic level in the London Plan with Policy 3.18 Education Facilities and Policy 4.12 Improving Opportunities both seeking to promote improved education and training provision across the capital in order to support social and economic progression.
- 4.5 Camden's Core Strategy supports new education floorspace in Policy CS10 (Supporting community facilities and services). Furthermore, Policy CS8 (Promoting a successful and inclusive Camden economy) seeks to strengthen the economic base of the Borough, not only through encouraging new economic development, but through broadening and improving the skills base to support that growth.

### **Mixed Use Development**

- 4.6 Policy DP1 of Camden's Development Policies promotes mixed use development as follows:

*"The Council will require a mix of uses in development where appropriate in all parts of the Borough, including a contribution to the supply of housing. In the Central London Area and the town centres of Camden Town, Finchley Road/Swiss Cottage and Kilburn High Road, where more than 200 sq m gross additional floorspace is provided, we will require 50% of all additional floorspace to be housing"*

- 4.7 In applying this policy approach, Camden advises that it will take into account the context and constraints of the site and proposed development.

### **Design**

- 4.8 The NPPF contains an overarching requirement for high quality, sustainable, design. This is carried through into the London Plan Policy 7.4 (Local character) and Policy 7.6

(Architecture) and Camden's Core Strategy in Policy CS14 (Creating high quality places and conserving our heritage) and Policy DP24 (Securing high quality design) and CPG1 (Design).

### **Sustainability**

- 4.9 Policy guidance requires all new development to adopt a proactive and flexible approach to meeting the Government's sustainability objectives. The London Plan promotes a sustainable approach to the design and operation of new buildings through Policy 5.1 (Climate change mitigation), Policy 5.2 (Minimising carbon dioxide emissions) and Policy 5.3 (Sustainable design and construction).
- 4.10 Camden's policy framework promotes sustainability through Policy CS13 (Tackling climate change through promoting higher environmental standards), DP22 (Promoting sustainable design and construction) and CPG3 (Sustainability).

### **Highways and Transportation**

- 4.11 Integral to building a sustainable future is the need to ensure that new developments are accessible by a range of modes of transport other than the private car. The NPPF, London Plan and Camden provide policy guidance on the need to promote sustainable travel.
- 4.12 Specifically, Camden Development Policies DP16, 17, 18, 19 and 20 seek to assess the transport implications of new development on the highway network and adopt a restraint approach to parking provision. The need to appropriately manage the delivery of goods and services is also a policy requirement.

## 5.0 CONSIDERATION OF ISSUES

- 5.1 A site meeting was held with Alex McDougall from the West Area Planning Team of Camden Council on 4th November 2014 to discuss the proposed development, following which a letter of advice was provided, dated 1st December 2014, highlighting key issues to be addressed in the planning application submission.

### Principle of the Proposed Development

- 5.2 The proposal is an extension to an established education facility within the Central London Area. As such the principle of additional education floorspace is considered acceptable.
- 5.3 The proposed development exceeds the 200 sq m threshold outlined in Policy DP1 and would therefore necessitate the provision of residential development in order to promote a mixed use development. It is considered inappropriate for the scheme to include residential floorspace for the following reasons:
- (i) The scheme is an extension to an existing education facility and cannot in practical terms accommodate residential floorspace.
  - (ii) Residential floorspace was provided as part of the original planning consent (2006/0427/P) granted in 2006. This consent established the principle of the redevelopment of the site to provide a new College facility and 37 new residential units, thereby fulfilling Policy DP1.
  - (iii) The proposed development represents a relocation of education floorspace from another part of Camden Borough. The provision is currently located at premises on Holmes Road in Kentish Town, but will need to relocate when the lease terminates in summer 2015. As such, the floorspace is not new to Camden, but a transfer from one part of the Borough to another.
- 5.4 Accordingly, it is clear that the site context and characteristics do not present the opportunity of accommodating residential development as part of the proposed extension. Furthermore, residential was provided as part of the original 2006 mixed use scheme; and the proposal represents a relocation of existing floorspace and cannot therefore be regarded as “additional” floorspace as described in Policy DP1.
- 5.5 Subject to detailed design, highways and amenity considerations, additional education floorspace in this location is acceptable. Furthermore, there is significant policy support at strategic and local level for the provision of new education floorspace, particularly where this would broaden the skills base within Camden.

### Design

- 5.6 The template for the proposed design is set by the existing building. Internally, the practical requirements of delivering Mechanical and Electrical Engineering and Construction Skills courses yield a building which provides large flexible workshops which can accommodate

these curricula areas. It is considered that the design approach which utilises the same materials as the main building is appropriate. The combination of brick at lower levels and polyester powder coated rain screen cladding at upper levels will provide a robust and consistent response to the existing building.

- 5.7 It is the intention to match the proposed brick to that used on the main building (Ibstock Antique Surrey Cream), in order to appropriately integrate the extension. This will create a high quality design response to the scheme in accordance with the policy objectives of DP24 (Securing high quality design).
- 5.8 The scheme includes an extension to the existing roof top plant, in an enclosure to match the existing. This will create an extension of 5m further west. Camden's comments at the pre application stage indicated that it would be preferable for the plant to be accommodated to the south where it would be less visible from residential properties. However, in structural terms this is not possible due to the structural frame of the existing building.
- 5.9 The additional plant will be visible from the upper floors of Burleigh House and Beckett House and from Sidmouth Street, but will be viewed in the context of the existing roof top plant. It is not considered that the additional plant will harm the amenity of neighbouring residential properties, nor views from the conservation area.

#### **Impact on the conservation area**

- 5.10 It is considered that the proposed extension will preserve the character and appearance of the Bloomsbury Conservation Area. Given the discrete location of the proposed development to the rear of the College, there will be limited views of it from public vantage points from within the conservation area. Furthermore, it will be viewed as an extension to the existing building.
- 5.11 The design approach of the extension continues the existing building lines of the main building, and the small single storey infill within the service yard will sit within the retained boundary wall. The increase in height of the boundary wall, created through the introduction of louvered panelling, will not increase the bulk of this part of the scheme out of proportion to the rest of the building. The proposed extension will not therefore be intrusive within the conservation area and will respect Policy CS14 (Promoting high quality places and conserving our heritage) and DP25 (Conserving Camden's heritage).

#### **Impact on St George's Gardens**

- 5.12 Furthermore, the extension will not be visible from St George's Gardens, given that views from the gardens are restricted due to the presence of intervening residential development at Burleigh House and Beckett House and landscaping. It will therefore not cause any harm to this Park of Special Interest.

### **Impact on residential amenity**

- 5.13 In terms of the potential impact of the proposed extension on residential amenity, consideration has been given to properties on Heathcote Street (Goodenough House) and Westking Place (Burleigh House and Beckett House) in respect of outlook, noise and air quality.

### ***Outlook and Privacy***

- 5.14 As noted above, the infill extension will not increase the overall bulk of the existing building. The main façade of the College's building will remain approximately 15m from residential properties on Westking Place. These residential properties were constructed and occupied after the College was built and their outlook will principally remain the same in terms of the scale of what they currently look out on to.
- 5.15 Indeed, it is considered that the outlook will improve, as the extension will remove views into the service yard area from the upper floors of these properties. The area is currently unsightly with storage containers and skips on view. The filling-in of this void and the single storey extension will tidy up the service yard and provide a neater outlook for neighbouring residential properties.
- 5.16 The retention of the service yard wall, with a louvred uplift in height, will maintain the existing envelope and not encroach any closer to neighbouring residential properties to the west.
- 5.17 Careful consideration has been given to the location of windows to ensure overlooking is minimised. Windows on the west elevation are located at clerestory height to avoid the potential for overlooking of neighbouring residential properties.
- 5.18 The upper floors of the College currently have windows which face the upper floor windows of Beckett House and Burleigh House, and Goodenough House on Heathcote Street. This relationship will not be made worse by the proposed development.

### ***Noise***

- 5.19 The proposed extension will accommodate the College's Mechanical and Electrical Engineering and Construction Skills provision. For the most part, these activities will take place inside the building. Bricklaying will spill out into the covered service yard area, but this area will be enclosed by the retained external perimeter wall and proposed roof, thereby containing any potential noise.
- 5.20 Furthermore, the College's external social space is located to the west of the building and generates a certain amount of noise with students coming and going. It is not considered that the proposed extension will increase noise levels above existing levels to the detriment of local residents.

### ***Air quality***

- 5.21 The proposed extension will necessitate the relocation of the College's backup generator within the service yard. The generator is used very infrequently, but is an essential piece of infrastructure for the College, which provides and maintains services in the event of a loss of power to the site. It is tested biannually.
- 5.22 A number of questions were raised at the pre application stage with regard to the generator. For clarification, the generator does not operate with a catalytic converter or particulate filter trap; it uses red diesel and the sulphur content will depend on when it was purchased.
- 5.23 The generator will be realigned lengthwise along the northern boundary wall within the enclosed service yard and be vented through the louvered grilles in this elevation.
- 5.24 In light of the fact that the generator is only for backup purposes, it is considered that it would not cause harm to levels of air quality in the vicinity of the site, nor indeed to noise levels, as it is only operated on an emergency basis.
- 5.25 Having regard to the above considerations, it is clear that the proposed development will not give rise to an unacceptable impact on the amenity of neighbouring residential properties and in this respect will meet the terms of Policy DP26 (Managing the impact of development on occupiers and neighbours) and CPG6 (Amenity).

### **Highways and parking**

- 5.26 The proposed development will not lead to an impact on the public highway network as no additional on-site car parking is proposed. Whilst the proposed development will lead to an increase in student numbers, by approximately 90, and staff numbers by approximately 7, it is anticipated that these people will travel to the site by public transport given its high PTAL rating and in accordance with Policy CS11 (Promoting sustainable and efficient travel) and DP18 (Parking standards and limiting the availability of parking).
- 5.27 However, the closure of the service yard to through traffic would enable an additional on-street car parking space to be provided on Heathcote Street, due to the removal of the crossover. It is understood this would be welcomed by Camden and the College confirm that this could be provided as part of the planning application proposals.
- 5.28 It is considered that the removal of the service yard drive-through would not harm the servicing arrangements of the College. Deliveries to the College currently total approximately 8 per day and these can be readily accommodated from the service road. The proposed development would require a maximum of 1 delivery per week and would not therefore make a material impact on the existing number.
- 5.29 Additional cycle parking is not proposed, given the low level of usage of cycling to access the College and this approach would appear to be supported by the Council.

### **Sustainability**

- 5.30 Camden's requirement for up to 10% of the building cost to be spent on sustainability is difficult to measure. The proposed development falls below the 500 sq m threshold for BREEAM. However, a Sustainability Statement has been prepared and submitted in support of the planning application which demonstrates the building's approach to reducing energy consumption in accordance with Policy CS13 (Tackling climate change through promoting higher environmental standards).



## **7.0 CONCLUSIONS**

7.1 Having regard to the above, it is considered that the proposed development is acceptable in planning terms for the following reasons:

- The principle of additional D1 education floorspace is acceptable in this location as the King's Cross Centre is an established education site.
- The scheme represents a logical infill of an underutilised double height void thereby maximising the use of brownfield land.
- The design approach is sympathetic to the existing building, utilising materials to match, thereby creating a scheme which is appropriate in design terms.
- The scheme does not impact on the public highway network, but offers the potential to create an additional on-street car parking space on Heathcote Street.
- A sustainable approach to the construction and operation of the extension is proposed
- The extension will improve an unsightly area by covering over the service yard, thereby improving the outlook for neighbouring residential properties.
- There will be no harm to residential amenity in respect of noise or disturbance as the use is consistent with existing activities on the site.

7.2 Based on the above reasons, the proposed extension is considered to be consistent with planning policy at national, strategic and local level. Therefore, in accordance with the NPPF's presumption in favour of sustainable development, planning consent should be granted.

**Louise Morton**  
**Quadrant Town Planning Ltd**  
**10<sup>th</sup> December 2014**

## **APPENDIX 1 RELEVANT PLANNING POLICIES**

## **London Plan 2011**

Policy 1.1 Delivering the strategic vision and objectives for London  
 Policy 3.1 Ensuring equal life chances for all  
 Policy 3.16 Protection and enhancement of social infrastructure  
 Policy 3.18 Education facilities  
 Policy 4.12 Improving opportunities  
 Policy 5.1 Climate change mitigation  
 Policy 5.2 Minimising carbon dioxide emissions  
 Policy 5.3 Sustainable design and construction  
 Policy 5.6 Decentralised energy in development proposals  
 Policy 5.7 Renewable energy  
 Policy 5.9 Overheating and cooling  
 Policy 5.10 Urban greening  
 Policy 5.11 Green roofs and site environs  
 Policy 5.13 Sustainable drainage  
 Policy 6.3 Assessing the effects of development on transport capacity  
 Policy 6.9 Cycling  
 Policy 6.10 Walking  
 Policy 6.13 Parking  
 Policy 7.4 Local character  
 Policy 7.6 Architecture  
 Policy 7.15 Reducing noise

## **Camden Core Strategy 2010**

CS1 Distribution of growth  
 CS2 Growth areas  
 CS5 Managing the impact of growth and development  
 CS8 Promoting a successful and inclusive Camden economy  
 CS9 Achieving a successful Central London  
 CS10 Supporting community facilities and services  
 CS11 Promoting sustainable and efficient travel  
 CS13 Tackling climate change through promoting higher environmental standards  
 CS14 Promoting high quality places and conserving our heritage  
 CS15 Protecting and improving our parks and open spaces and encouraging biodiversity  
 CS16 Improving Camden's health and well being  
 CS17 Making Camden a safer place  
 CS18 Dealing with our waste and encouraging recycling  
 CS19 Delivering and monitoring the Core Strategy

## **Camden Development Policies 2010**

DP1 Mixed use development  
 DP16 The transport implications of development  
 DP17 Walking, cycling and public transport  
 DP18 Parking standards and limiting the availability of car parking  
 DP20 Movement of goods and materials

DP21 Development connecting to the highway network  
DP22 Promoting sustainable design and construction  
DP24 Securing high quality design  
DP25 Conserving Camden's heritage  
DP26 Managing the impact of development on occupiers and neighbours  
DP28 Noise and vibration  
DP29 Improving access  
DP32 Air quality and Camden's Clear Zone

### **Camden Planning Guidance 2013**

CPG1 Design  
CPG3 Sustainability  
CPG6 Amenity  
CPG7 Transport  
CPG8 Planning obligations