



Planning
Statement

Camden Town Hall Annexe

Crosstree Real Estate Management Ltd

December 2014

Prepared By Status.. Date

Reviewed By Status.. Date

For and on behalf of GVA Grimley Ltd

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1. Introduction

- 1.1 This Planning Statement is submitted in support of a full planning application made on behalf of Crosstree Real Estate Management Ltd (the 'Applicant') for the redevelopment of Camden Town Hall Annexe (CTHA), Argyle Street, London WC1H (the 'Application Site'), which is located within the London Borough of Camden (LBC). This statement demonstrates the planning case in support of the proposals in the context of relevant national, regional and local planning policy, and other best practice guidance.
- 1.2 Crosstree Real Estate Management Ltd agreed to acquire the site from LBC in summer 2014, following the Council's decision to relocate to modern premises within the King's Cross Central development. In preparation for a planning application, the Applicant has been in detailed discussions with relevant stakeholders, including planning officers at the London Borough of Camden to bring forward a proposal for a new high quality hotel on the site, which is proposed to be operated by The Standard.
- 1.3 Crosstree Real Estate Management Ltd is an experienced London focused developer and investor, committed to high quality development. Notable recent schemes include 20 Golden Square in West Soho, where planning permission was granted for a sensitive refurbishment of the existing building and the Old Street Roundabout, where planning permission was granted for the refurbishment and upgrading of the existing buildings and associated improvements to the public realm.
- 1.4 The Standard, the proposed operator for the hotel, has a collection of boutique hotels on the East and West coasts of America. The brand is known in particular for its chic and contemporary approach and their hotels typically offer a full service offer and high staff to guest ratios.
- 1.5 The application seeks full planning permission for the following development:
- "Change of use from council offices and library (sui generis use class) to hotel (C1 use class), and alterations to the building including removal of roof top plant, an extension at roof level and alterations to the façade".

- 1.6 Subject to the grant of planning permission, Crosstree Real Estate Management Ltd proposes to commence works in spring 2015.

Supporting Information

- 1.7 This Planning Statement should be read in conjunction with the accompanying application forms, plans and drawings submitted as part of the application, as well as the following supporting documents, the scope of which has been agreed with LBC:

- Design and Access Statement, including Heritage Statement and Landscaping Scheme (ORMS);
- Air Quality Assessment (Peter Brett Associates);
- Daylight and Sunlight Report (GVA Schatunowski Brooks);
- Noise, Vibration and Ventilation Assessment (Scotch and Partners);
- Office and Hotel Study (CBRE);
- Statement of Community Involvement (LCA);
- Sustainability Statement (Arup); and
- Transport Assessment, including a Travel Plan and a Servicing Management Plan (RGP).
- Hotel Management Plan (GVA and The Standard).
- Construction Management Plan (Knight Harwood).
- Waste Storage and Collection (ORMS).

Pre-Application Engagement

- 1.8 The National Planning Policy Framework (NPPF) notes that pre-application discussions have the potential to improve the efficiency and effectiveness of the planning application system for all parties (Para 188), and that the more issues that can be resolved at the pre-application stage, the greater the benefits (Para 190). Planning authorities are asked to look for solutions rather than problems and decision takers are urged to approve applications for sustainable development where possible (Para 187).

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- 1.9 In accordance with the spirit of the NPPF, the development proposals have been subject to pre-application consultation and discussion with officers at LBC, including Ed Watson (planning), Frances Wheat (planning), Neil McDonald (planning), David Fowler (planning), Ed Jarvis (design), Catherine Bond (Conservation and Heritage), Steve Cardno (transport), and Genny Fernandes (Economic Development).
- 1.10 The applicant team has also engaged with other key stakeholders, including Transport for London (TfL), English Heritage and Local Conservation Area Advisory Committees. The feedback received through this consultation has directly informed the evolution of the proposed development.
- 1.11 Extensive public consultation with local residents and businesses has also been undertaken, including a Development Management Briefing (4th September) and a public exhibition (16th and 18th October), both held in close proximity to the application site.
- 1.12 Further details of the consultation exercises undertaken and the responses received are provided in the enclosed Statement of Community Involvement, prepared by LCA.

2. Site Context

Site Location

- 2.1 The application site comprises an area of approximately 0.23 hectares and is located in Argyle Street on the south side of the Euston Road opposite St Pancras International and King's Cross stations.
- 2.2 The CTHA is an 8 storey building (with two levels of basement) constructed between 1974 & 1977 for use as civic offices. Then in 1992 LBC began to use the ground floor of the building as a Public Library. The roof of the annexe includes plant with the maximum height of the structure extending up to c. 38 m. The existing net floor area is 15,363 sqm (including plant & basements) and there is a small secured external space to the south.
- 2.3 The site is at one of the most accessible locations in London. Directly across the road from the main entrances to the national and international St Pancras and King's Cross Stations, the site also benefits from convenient access to King's Cross/ St Pancras Underground station which is served by six underground lines. The site is also served by a number of bus routes on Euston Road.
- 2.4 The area to the north of Euston Road is undergoing substantial change and the stations serve as gateways into London. King's Cross Central is also becoming a new destination in its own right.
- 2.5 The CTHA sits on the corner of Argyle Street and Euston Road, a major road separating the site from St Pancras and King's Cross. The road is part of Transport for London's strategic road network.
- 2.6 Across the road, to the north of the application site are important heritage assets including King's Cross (Grade II) and St. Pancras stations (Grade I), St Pancras Chambers (Grade I) and the Great Northern Hotel (Grade II). There are also other heritage assets in the vicinity such as Camden Town Hall (Grade II) and the King's Cross and Bloomsbury Conservation Areas to name a few.
- 2.7 King's Cross has undergone, and continues to undergo, significant re-development and transformation. These include:

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- Restoration of St Pancras Chambers and station
 - Restoration of the Great Northern Hotel and a new King's Cross Station western concourse
 - King's Cross Central phases including University of the Arts (Granary building)
 - King's Cross/St Pancras Underground capacity improvements
 - Kings Cross Square
 - Regent's Quarter
 - The Francis Crick Institute

2.8 To the south of the application site is a mixed use area characterised by small hotels, mansion blocks, residential streets providing walking routes to Bloomsbury and the West End and Argyle Primary School. To the west is the Old Town Hall, a Grade II Listed Building, and beyond this is Somers Town located between St Pancras and Euston Stations. To the north-east in Islington are the residential neighbourhoods focussed around Caledonian Road.

Previous Relevant Planning History

2.9 There is little previous relevant planning history relating to the site. The most relevant is a change of use of part of ground floor from Council offices to public library including installation of new fire exit door and ramp on the Euston Road frontage (ref: PL/9240003/R2).

3. The Proposed Development

- 3.1 The proposed development seeks to provide a new high quality hotel with ancillary facilities and retail within the former LBC office and library building which has been declared surplus to requirements by the Council.
- 3.2 The proposed development would result in the sustainable re-use of the existing building with high quality, sensitive extensions to create a building that would provide much needed hotel accommodation in a highly accessible area of London. In addition to improvements to the buildings appearance, the development will significantly increase the quality of the public realm around the building in accordance with the Council's adopted development plan
- 3.3 Full details of the proposed development are provided in the accompanying Design and Access Statement and planning application drawings prepared by Orms Architects. The key details of the proposals are summarised below.

Description of Development

- 3.4 The proposed development comprises the following:

"Change of use from council offices and library (sui generis use class) to hotel (C1 use class), and alterations to the building including removal of roof top plant, an extension at roof level and alterations to the façade".

Development Content

- 3.5 A breakdown to the main proposed land uses is set out in the table below.

Table 1.1 Land Uses

Land Use		GIA (sq.m.)
Hotel	Above grade	13,702
	Below grade	3,575
Total		17,277

- 3.6 At ground floor there would be the main entrance from Argyle Street, the hotel reception, lifts to upper floors, a hotel lobby and some ancillary hotel retail floorspace. The development would be glazed around the majority of the ground floor to provide active and animated frontages and will also provide improved routes and wayfinding in the surrounding area.
- 3.7 The basement is split over two levels and is expected to provide the main kitchen area; refuse storage; cycle parking; hotel function room; hotel plant; and other back of house hotel functions. All deliveries and servicing will also take place from within the basement.
- 3.8 The 1st – 9th floors of the building will provide 270 hotel bedrooms. Larger guest rooms will be provided in the Hotel 'Sky Suite' which occupies the new floorspace to be created at the top of the buildings along with lounge and kitchen spaces.

4. Planning and Regeneration Benefits

4.1 The proposed development to provide a hotel in a highly accessible and sustainable location will enable a number of planning and regeneration benefits to be delivered in the King's Cross Area. These include:

- Sustainability benefits through the retention and re-use of an existing vacant building and minimisation of construction nuisance associated with demolition.
- The modernisation of and visual improvements to the appearance of a building currently considered to detract from the character of the King's Cross Conservation Area.
- Heritage improvements through the demolition of the existing stair core on the western elevation to allow the Grade II Listed Camden Town Hall building to stand-alone as originally constructed.
- Demolition of the existing stair core on the western elevation would allow for views between the Town Hall and the annexe to be opened through from Euston Road and Tonbridge Street.
- Public realm improvements to allow access around the entire building which would create greater legibility and wayfinding from north to south, thus enhancing the public realm and helping to create place.
- The currently abandoned external space behind the annex will be transformed into a new hotel garden incorporating a permissive path east-west route between Argyle Street and Tonbridge Street.
- Creating active frontages to add vitality and vibrancy to a building which currently 'turns away' from the street.
- A series of publicly accessible hotel amenity floors creating new views of the surrounding area, heritage assets and fast-changing King's Cross.

- The creation of approximately 650 employees who will help with the running of the Standard London, although clearly this total will be split between a number of separate shifts, and the creation of around 500 jobs during the construction phase.
- A well-managed hotel facility that will take pride in its presentation and appearance and work with LBC to ensure any new public realm is well maintained and managed.

5. Planning Policy Framework

- 5.1 This section describes the national, regional and local planning policy context relevant to the Proposed Development. It also describes the designations affecting the Site.

Adopted Planning Policy and Guidance

- 5.2 The National Planning Policy Framework (NPPF), published 27 March 2012, sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is the framework beneath which local and neighbourhood plans will sit and respond to the needs and priorities of local communities. It sets out a presumption in favour of sustainable development (Para 14). This means that development which is sustainable can be approved without delay (Para 15). The NPPF requires that in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development (Para 197).
- 5.3 The National Planning Practice Guidance (NPPG) was launched on the 6 March 2014 and provides a web-based resource in support of the NPPF. Following public consultation on a 'beta' version ending the 9 October 2013, the NPPG has been amended to include greater emphasis on the importance of bringing brownfield land into use. Following its launch, a number of previously published planning guidance documents have been cancelled and are detailed within the Written Ministerial Statement titled 'Making the planning system work more efficiently and effectively', also dated 6 March 2014.
- 5.4 In accordance with Section 38(6) of the Planning and Compulsory Act (2004) planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant development plan is the London Plan (2011) and the Camden Local Plan which consists of the Core Strategy (2010) and Development Policies (2010). Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in the Borough. The NPPF constitutes a material consideration in the assessment of this application.
- 5.5 Other material documents for the assessment of this application include:
- London Mayor Supplementary Planning Guidance (SPG) documents, including:

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- Accessible London: Achieving an Inclusive Environment SPG
 - Sustainable Design and Construction SPG
 - LBC Site Allocations DPD
 - Camden Planning Guidance (CPG) Documents, including:
 - CPG 1 – Design
 - CPG 3 – Sustainability
 - CPG 5 – Town centres, retail and employment
 - CPG 6 – Amenity
 - CPG 7 – Transport
 - CPG 8 – Planning Obligations
- 5.6 On 11 October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). From this date, the REMA are operative as formal alterations to the London Plan and form part of the development plan for Greater London. Alongside the London Plan (and its formal alterations), the GLA has also published a range of Regional Supplementary Planning Guidance/Documents.
- 5.7 A full assessment of adopted development plan policies and national planning guidance is set out at Section 6.

Emerging Planning Policy and Guidance

Further Alterations to the London Plan

- 5.8 Draft Further Alterations to the London Plan (FALP) were published for public consultation in January 2014. The draft FALP has been prepared primarily to address key housing and employment issues emerging from an analysis of census data released since the publication of the London Plan in July 2011 and to reflect on the adoption of the NPPF. On 15th December 2014, the Inspector released his report on the FALP. This report concluded that the London Plan as changed by the Further Alterations provides an appropriate basis

for the strategic planning of Greater London provided the suggested and further suggested changes are made and those recommendation accepted.

Camden Council Community Infrastructure Levy (CIL)

- 5.9 LBC undertook a public consultation exercise in June/July 2014 with regards to their CIL Draft Charging Schedule.
- 5.10 On 28 August 2014, LBC submitted the Draft Charging Schedule 2014 for independent examination together with supporting evidence. The public hearing to consider these details will commence on the 11th of November 2014.
- 5.11 It is anticipated that the Inspector's decision and the full Council adoption of the CIL charging schedule will take place in by the end of March 2015.
- 5.12 The application site would fall within Zone A (central) of the charging schedule. As such, the draft charging schedule proposed at present is £40 per sqm for hotel development.
- 5.13 In discussions with officers at LBC it is not anticipated that this application will be subject to LBC CIL given that it is unlikely to be adopted prior to a decision on this application.

Site Specific Allocations / Designations

- 5.14 The application site is Site No. 2 (Camden Town Hall Extension, Euston Road/Argyle Street) of the LBC Site Allocations DPD.
- 5.15 Site specific guidance contained within the DPD highlights that the refurbishment or redevelopment for new offices, residential, community and/or other appropriate Central London uses to facilitate relocation of existing uses will be acceptable but any development will be expected to:
- Where demolition is proposed be an architecturally excellent building which contributes positively to its sensitive location.
 - Fully appreciate and respect the setting of the Grade I listed St Pancras and King's Cross stations and Grade II listed Town Hall and nearby listed terraced housing.

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- Facilitate the planned re-provision of Council offices, facilities and library accommodation.
 - Provide appropriately designed active frontages and positively enhance the townscape of Euston Road.
 - Maintain and enhance the pedestrian route through to Tonbridge Street.
 - Contribute towards an improved public realm and streetscape which responds to the other streetscape and public space improvements around King's Cross.
 - Provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible.

5.16 The DPD goes on to highlight the excellent public transport accessibility level of the site and the site's Central London location. The document is conscious of the heritage assets by virtue of conservation area designations and nearby listed buildings, but it does add that the building typology along the Euston Road corridor is varied in scale and style, with a mix of largely commercial, institutional and public uses.

5.17 The Site Allocation clearly identifies that the conversion and refurbishment of the existing building will be acceptable. Nevertheless, it goes on to add that new development is likely to be acceptable where it (amongst other design considerations):

- successfully integrates itself with the surrounding townscape and respects the built form and historic context of the immediate area.
- respects and appreciably improves the setting of, and relationship with, the adjacent Town Hall.
- is appreciably sensitive and respectful in scale and form to its relationship with the important landmark of St Pancras Chambers, and its wider setting.
- positively contributes to improving pedestrian permeability and accessibility.
- positively responds to, and respects the context of, its surroundings including public spaces, residential amenity, and the adjacent school.

- positively responds to and respects the context of its surroundings including the scale and form; building ,roof and sky lines; and appropriate architectural characteristics of surrounding buildings;
- redresses the design scale and massing shortcomings of the existing building and appreciably improves on the streetscape, particularly at street level.
- respects and enhances existing important views or assists in revealing new views, of the important landmark of St Pancras Chambers and its towers and spire.

5.18 Whilst recognising that the Council's preferred use of the building would be for residential, it is acknowledged that other uses, such as retail, hotel or other tourism uses, could also prove acceptable.

5.19 Lastly, the DPD identifies that the interaction of the building with Euston Road, particularly at street level, the quality of the public realm around the site and route from Euston Road through to Tonbridge Street would benefit from greater clarity and enhancement. Given the relatively constrained nature of the site it is unlikely that a significant open space could be feasibly provided on site at ground level. Redevelopment could offer an opportunity for an east-west link to the rear and a secure and overlooked small scale garden/sitting area to escape the busy nature of Euston Road might also be integrated. The opportunities for balconies or terraces in refurbishment or re-development should also be explored.

5.20 Whilst not forming part of the LBC's Development Plan, the Council did complete and publish a Planning Statement for the site which informed the sale of the site. As such, this document has been considered during the evolution of this development and is judged to be a material consideration.

5.21 Key statements from this document include:

- "Camden Planning Guidance (CPG5) adds clarification as to the circumstances where a change of use from offices would be acceptable. It states that a change of use may be allowed in the case of older office premises since it is expected that new office accommodation coming on stream during the plan period will meet projected demand. . . In this case, the Council intends to relocate from CTHA to new purpose-built premises nearby and accepts that the premises do not meet

modern standards for office occupiers. Kings Cross Central is identified as delivering a significant majority of new office floorspace to meet Camden's future demands. Therefore, evidence of site marketing is unlikely to be required to justify the conversion or redevelopment of these offices if a change of use to a non-business use was proposed in this case".

- In line with CS9 of the Core Strategy and DP14 of the Development Policies the Council will support the provision of tourist and visitor accommodation in this location on the basis that it would be well suited to highly accessible Central London location such as Kings Cross and would not compromise the delivery of higher priority uses such as housing, which is the preferred use for surplus employment sites.

6. Planning Analysis

6.1 This section provides an assessment of the proposal against the national, regional and local planning policy framework as set out in Section 5 and builds upon the description of planning and regeneration benefits set out in Section 4.

6.2 These considerations are as follows and each is assessed in turn:

- Land Use Principles
- Approach to Mixed Use Policy
- Urban Design
- Heritage & Archaeology
- Inclusive Design
- Crime Prevention
- Neighbouring Amenity
- Transport, Construction Management & Servicing
- Waste and Recycling
- Sustainability and Climate Change
- Trees
- Noise
- Air Quality

6.3 In summary it is our view that the land use case is made and that a hotel in this location would result in significant benefit. We expand on this below.

Land Use Principles

- 6.4 At the heart of the NPPF is a presumption in favour of sustainable development. This means that development proposals that accord with the development plan should be approved without delay (Para 14). It is considered that the proposed development should benefit from this presumption in favour of sustainable development insofar as it seeks to address national, regional and local planning policy requirements to optimise the use of brownfield locations for the delivery of much needed visitor accommodation in a highly accessible location.
- 6.5 The CTHA building was constructed between 1974 and 1977 for the purposes of providing additional civic administration and office space as an extension to the main town hall. However, LBC have recently declared the extension surplus to requirements and relocated these office functions into a new building in the Kings Cross re-development. As such, the building has been sold on the open market and is now vacant.
- 6.6 The development proposed would introduce a high quality hotel in a sustainable location. The hotel would comprise of 270 bedrooms as well as including ancillary restaurants, bars, function room and retail units that would be accessible to the public from Euston Road.

Policy Summary

Loss of Employment

- 6.7 The NPPF includes the requirement to proactively drive and support sustainable economic development to deliver the homes, businesses and infrastructure and thriving places that the country needs; encourage the effective use of land by reusing land that has been previously developed (brownfield land); promote mixed use developments and encourage multiple benefits from the use of land in urban areas; and focus significant development in locations which are or can be made sustainable (Para 17).
- 6.8 The NPPF specifically states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose (Para 22).

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- 6.9 Policy 2.10 (Central Activities Zone – strategic priorities) of the London Plan states the Mayor will, and boroughs and other relevant strategic partners should, amongst others things:
- a) enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ), supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses and forming the globally iconic core of one of the world’s most attractive and competitive business locations.
 - b) sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components such as the River Thames, the Royal Parks, World Heritage Sites, designated views and more local features including the public realm and historic heritage, smaller open spaces and distinctive buildings, through high quality design and urban management
 - c) sustain and manage the attractions of CAZ as the world’s leading visitor destination
- 6.10 Policy CS8 (Promoting a successful and inclusive Camden economy) of the Council’s Core Strategy states that the Council will secure a strong economy and will support Camden’s industries by safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers.
- 6.11 Additionally, Policy DP13 (Employment premises and sites) of the LBC Development Management policies states that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:
- a) it can be demonstrated to the Council’s satisfaction that a site or building is no longer suitable for its existing business use; and
 - b) there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.
- 6.12 Camden Planning Guidance (CPG5) adds clarification as to the circumstances where a change of use from offices would be acceptable. It states that a change of use may be allowed in the case of older office premises since it is expected that new office accommodation coming on stream during the plan period will meet projected demand. The guidance (Para 6.4) goes on to list various criteria to be taken into account when

assessing applications for a change of use from B1 to a non-business use. This includes the age and condition of premises; whether the premises include features required by tenants seeking modern office accommodation; and whether the existing occupiers intend to relocate. Where an assessment of the suitability of older offices for continued business use cannot be made based on these factors alone, additional marketing evidence may be requested by the Council.

- 6.13 In this case, the Council has relocated from CTHA to new purpose-built premises nearby and the Council has stated within their Camden Town Hall Extension Planning Statement (April 2013) that it is accepted that the premises do not meet modern standards for office occupiers. Kings Cross Central is identified as delivering a significant majority of new office floorspace to meet Camden's future demands. Therefore, evidence of site marketing is unlikely to be required to justify the conversion or redevelopment of these offices if a change of use to a non-business use was proposed in this case. The Camden Site Allocations Local Plan similarly supports reuse, but also alternative uses.

Hotel Use

- 6.14 London Plan Policy 4.5 (London's Visitor Infrastructure) states that the Mayor will, and boroughs and relevant stakeholders should support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London. The plan seeks to achieve 40,000 net additional hotel bedrooms by 2031, of which at least 10 per cent should be wheelchair accessible; and to ensure that all new visitor accommodation is in appropriate locations such as within the Central Activities Zone (CAZ).
- 6.15 At a regional level there is a clear steer for the provision of hotel accommodation in the location of the development site i.e. close to central London and international and national transport termini.
- 6.16 This strategic approach is reflected at a local level whereby Policy CS1 (Distribution of Growth) seeks to promote a concentration of development in the King's Cross Growth Area and in other highly accessible locations. Also, Policy CS9 of the Camden Core Strategy recognises that in order to achieve a successful central London economy, the Council supports future growth in hotels as well as seeking to improve the quality of the area's streets and places, the connections between them and the ease of movement into, and through, the area. This is re-iterated in Core Strategy Policy CS8 which recognises

the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.

6.17 Additionally, Policy DP14 (Tourism Development and Visitor Accommodation) of Camden Council's Development Policies DPD allows the Council to support tourism development and visitor accommodation by expecting new, large-scale tourism development and accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn.

6.18 Further to the policies above, the Camden Town Hall Extension is included as an allocated site within the Camden Site Allocations LDD. Within this allocation, it is stated that "new uses could reutilise the existing building and refurbish it to bring it up to modern standards". . . and "other uses, such as retail, hotel or other tourism uses, could also prove acceptable on the site".

Assessment

Loss of Employment

6.19 It is acknowledged in the Site Allocations LDD and the LBC Planning Statement (April 2013) that the Council has secured new facilities for their offices and a library with the King's Cross development, and as such, the Town Hall Annexe is surplus to their requirements.

6.20 The Council have acknowledged that the building is not up to modern office standards and the King's Cross re-development will ensure an adequate supply of office accommodation is provided within the borough. As such, the Council have recognised that the future of the site for employment purposes is unlikely and as such, it is stated that they are unlikely to request marketing evidence as part of an application. Nevertheless, this application includes a study carried out by CBRE on the property market conditions in this part of London which further demonstrates why the building is no longer fit to be used for office accommodation. Key findings of the CBRE report include:

- In its current state 'sui generis' office space at CTA is substantially below the requirements of a modern office occupier and is therefore not suitable for office use. Substantial investment would be required to completely refurbish the current building so that it meets the requirements of a modern office user. The cost of which has been judged as prohibitive by Camden Council.

- The premises were constructed specifically for exclusive occupation by Camden Council. The large deep floorplates are not conducive for letting to SMEs and therefore would need to be partitioned to provide smaller suitable spaces. These works, and the provision of services for each of those spaces, would be impractical and inefficient as a large proportion of the accommodation would be used by common areas such as corridors and partitioning.

- 6.21 Overall it is considered that the loss of the office accommodation is acceptable in principle. It has been demonstrated that the building is of an age and condition where it would be unlikely to attract an office based business function. A new build office scheme would also be impractical given the unsustainable practice of demolishing the existing building and that the Council acknowledge that the boroughs future supply of office accommodation will be delivered as part of the Kings Cross development.
- 6.22 It should also be acknowledged that the provision of a hotel in this location will also result in significant employment generation. Given that the end occupier is known (The Standard), employment generation can be accurately forecasted in relation to their business model. As a high end hotelier and based on data from their hotel group, The Standard have concluded that in the region of 650 FTE jobs would be created to service this sized hotel.
- 6.23 This demonstrates that the proposals would be an employment generating commercial activity which would result in the net increase in available jobs. It is also worth noting that the types of jobs that would be generated through the establishment of a hotel in this location would be far more likely to go to local people, rather than commuters coming in to, and out of, Kings Cross and St Pancras had a speculative office scheme been pursued. Additionally, because no demolition is required, the development programme will be shorted, so the future jobs will be delivered sooner.
- 6.24 The applicant has engaged with the Council Economic Development Officer with regards to the employment opportunities that will be generated by these proposals. In accordance with CPG8 (Planning Obligations) the applicant has committed to working with the Council and its partners to deliver apprenticeships and work placements during the course of construction; to optimise the number of construction jobs that go to local people; and to sign up to the Local Procurement Code to ensure that, where possible, local suppliers could be used.

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- 6.25 In addition to the measures of employment generation during the course of construction the applicant has also expressed their interest in working with the Council and their partners to deliver as many employment opportunities to local people as possible. The applicant has already entered into discussions with Westminster and Kingsway College to establish a link to provide apprenticeship opportunities. Furthermore, it should be noted that it is within the applicants interest to work with the Council and their partners to deliver employment to local people. When the hotel becomes operational, the level of employment required will be immediate and it is anticipated that local people will fill these roles.
- 6.26 In conclusion, it has been demonstrated that the building is no longer suitable for employment purposes (B Class Uses). This has been established by both the Council and the applicants consultant team. Additionally, a hotel development of this nature would result in a net increase of employment opportunities within the borough with many of these going to local people. The development would also result in a number of work placements, apprenticeships and local jobs during the construction phase.

Hotel Use

- 6.27 Given the sites location within the Central Activities Zone on the edge of the King's Cross Growth Area and directly alongside the internationally and nationally important transport hubs, as well with excellent connections through these stations to central London, it is clear that the application site is in a sustainable and highly accessible location where the provision of hotel accommodation should be encouraged. A hotel in this location would constitute sustainable development of brownfield land as well as enhancing and promoting London's visitor infrastructure, thus contributing to the London Plan requirement of 40,000 net additional bedrooms by 2031.
- 6.28 Further to compliance with national and regional policy, a hotel in this location would also accord with LBC's development plan in principle as Policies CS1, CS9 & DP14 seek to direct land uses of this type to highly accessible areas. Overall, it is considered that the application site is in an excellent, sustainable and accessible location that would provide much needed hotel accommodation to improve London's tourism and business offer.
- 6.29 As such, considering the thrust of policy set out above, it is recognised that this site is suitable for hotel development.

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- 6.30 Further to the justification of the loss of office accommodation, it is important to understand why the provision of a hotel is an acceptable use, when local policy seeks the provision of housing as a preferred option. The retention of the existing building is the most sustainable option for re-development and would have the least impact upon the surrounding environment during construction.
- 6.31 The existing building is of a scale and footprint that does not lend itself well to a residential conversion. The building footprint is too deep which would result in long, narrow rooms forming sub-standard accommodation and it is therefore considered that a re-development to provide residential dwellings would be inappropriate. A residential re-development of the existing building would result in the following:
- Generally single aspect flats.
 - Deep flats with inadequate access to daylight and/or sunlight.
 - A Net to Gross ratio of 59% which is highly inefficient.
 - Window openings onto Euston Road which would result in harm upon amenity in terms of noise and air quality.
 - Poor outlook for any flats within the western elevation facing the Old Town Hall building.
 - No direct outdoor amenity space as the existing structure would not take balconies.
 - The west core would need to be retained for residential access which would limit public realm benefits.
 - Re-provision of services (i.e. water, gas, ventilation etc) would compromise the building and the floor to ceiling heights.
- 6.32 Whilst residential accommodation does not work within the existing building, the provision of a hotel, whereby rooms can be artificially lit, or the central areas of the deep building can be used for ancillary facilities, is achievable. As such, a new hotel with a well established operator would bring additional life and vitality to this part of Camden. The hotel would result in employment (approx 650 jobs), would be an attraction for visitors to London, whether recreationally or professionally, and the ancillary restaurant and Sky Suite

facilities, open to the public, would fit in well with the vibrancy of the King's Cross area and provide public access and views not currently available. Indeed, discussions with local businesses suggest that a hotel in this location would add to a successful mix of uses in the area.

- 6.33 In conclusion, it is considered that the principle of a hotel in this location would be wholly compliant with national, regional and local policy and would provide an excellent facility within the a highly accessible location.

Approach to Mixed Use Policy

Policy Summary

- 6.34 LBC Core Strategy Policy CS1 (Distribution of Growth) sets the overarching approach to support mixed use developments within highly accessible locations in order to make the best use of Camden's limited land.
- 6.35 Development Policy DP1 (Mixed Use Development) states that the Council will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. In Camden, where more than 200 sqm (gross) additional floorspace is provided, up to 50% of all additional floorspace will be required to be housing in the first instance. On the basis that the proposed development will generate 1,914 sqm (GIA) of net additional floorspce, this policy requirement is therefore triggered.
- 6.36 In the first instance, the policy requires any secondary uses to be provided on site, particularly where 1,000 sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the policy outlines that a contribution to the mix of uses elsewhere in the area, or exceptionally, a payment in lieu, may be acceptable.

Assessment - Appropriateness of On Site Residential Use

- 6.37 In considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:
- a) The character of the development, the site and the area;

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- b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;
 - c) the need for an active street frontages and natural surveillance;
 - d) the economics and financial viability of the development including any particular costs associated with it;
 - e) whether the sole or primary use proposed is housing;
 - f) whether secondary uses would be incompatible with the character of the primary use;
 - g) whether an extension to the gross floorspace is needed for an existing user;
 - h) whether the development is publicly funded;
 - i) any other planning objectives considered to be a priority for the site.
- 6.38 The proposed development will generate additional floorspace in the region of 1,914 sqm (GIA). Thus the policy is triggered at CTHA and, as a starting point, it requires 50% (GEA) of any additional space to be provided as residential, where appropriate and subject to addressing each of the identified tests which are discussed further in the analysis below. This analysis sets out reasoned justification as to why it is not considered appropriate to incorporate residential use as part of the proposals for CTHA.

a) The character of the development, the site and the area

- 6.39 The application site is within a commercial and busy part of London which is characterised by activity from Euston Road, St Pancras and King's Cross Stations to the north. These characteristics result in difficulties with regards to the provision of on-site residential accommodation. The level of activity and the land uses to the north of the site would prove difficult to provide residential accommodation in a building directly fronting Euston Road given the potential for noise, odours and air quality impacts that could arise. As such, it is considered that the characteristics of residential development would not be reasonably compatible with this area. It is also considered that the existing building does not lend itself well to the provision of residential accommodation (as outlined in Paragraphs 6.26 & 6.27 above).

b) Site size, the extent of the additional floorspace, and constraints on including a mix of uses.

- 6.40 As set out in Paragraphs 6.26 and 6.27 above, the existing building would not lend itself well to residential accommodation. The building is of a scale and footprint that would ultimately result in sub-standard residential accommodation as well as the inefficient use of space, which in itself would be un-sustainable. The provision of residential accommodation in the existing building would fail to optimise the development potential of the site, thereby failing the spirit of London Plan policies. As such, it is concluded that the building is constrained to such a degree that residential accommodation would be inappropriate.

c) The need for active street frontages and natural surveillance

- 6.41 One of the more negative aspects of the existing annexe building is that it creates a very defensive stance and 'turns its back' from the streetscene. As such, the street frontages of the existing ground floor do not contribute in a positive manner to the vibrancy of the King's Cross area.
- 6.42 The proposed development would allow for the building to embrace and enhance the streetscene by introducing active edges which include a hotel reception, retail and lobby areas. In particular, routes around the entire building would be opened up for use by the public which would bring activity and allow for a safer environment in the immediate surrounds of the site than the current situation. Additionally, the floor to ceiling re-glazing of the ground floor of CTHA will allow for visibility into, and out of the hotel which will bring added movement, life, vibrancy and character into the streetscene and area.
- 6.43 There is a clear need, from an urban design perspective, to alter the frontages of the building to create this active edge. It is also considered that residential elevations on the ground floor facing directly onto the streetscene, in particular Euston Road, would be inappropriate. Introducing residential on the ground floor would allow for windows within close proximity of public footways with little or not defensive space which would ultimately result in harm to residential amenity in terms of noise and privacy etc from such a main thoroughfare like Euston Road.

d) The economics and financial viability of the development including any particular costs associated with it.

6.44 Given the impracticalities of delivery of residential accommodation, it is not considered reasonable to test this.

e) whether the sole or primary use proposed is housing

6.45 No housing is proposed as part of the development.

f) Whether secondary uses would be incompatible with the character of the primary use

6.46 In order to provide residential accommodation within the existing building, and alongside the proposed hotel use, the western core would need to be retained in order to provide separate entrances. This would not allow for some of the public realm benefits in terms of opening up the ground floor to create active uses and the separation of the annexe from the main town hall to be delivered.

g) whether an extension to the gross floorspace is needed for an existing user

6.47 The existing user (LBC) has declared the site surplus to requirements and has vacated the building. As such, the building is being considered for an entirely new user.

h) whether the development is publicly funded

6.48 The development is not publicly funded.

i) any other planning objectives considered to be a priority for the site

6.49 The provision of hotel/visitor accommodation is an objective set out in the Council's Development Plan. This hotel development would also result in ancillary uses such as a retail unit, hotel lobby and hotel sky suite. Whilst it is recognised that residential accommodation is a priority for the borough, it has been shown above, that residential accommodation is not suitable on the site and that the employment uses are also not compatible with the building. As such, the proposed development seeks to address other objectives of the Council's Development Plan by re-developing a brownfield site for hotel accommodation.

Summary

6.50 In summary, it is not possible to accommodate a mix of uses on the site for reasons noted above.

Assessment – Provision of Off Site Residential Use

- 6.51 As set out above, if it is satisfactorily demonstrated that accommodation of a mix of uses on site is not appropriate for a particular site, then the Borough's next preference is for the provision of residential use to be made elsewhere in the area.
- 6.52 Crosstree Real Estate Management Ltd (the applicant) do not own any other sites in the search area. Accordingly, an off-site housing site search has been undertaken with the purpose of identifying a suitable and deliverable housing site by GM Real Estate. Nevertheless, it is noted that the Borough has limited published guidance available on the undertaking of an off-site housing site search. However, parameters of the search exercise have been agreed with LBC planning officers during pre-application discussions and the key requirements for the search exercise have been established:

a) Location

- 6.53 LBC officers have advised on the extent of the area in which to undertake the site search as there is no policy or guidance that sets out a geographic area within which applicants should search for sites for off-site provision. Officers have advised that to establish that the search area should include all areas within the borough to the south of Euston Road.

b) Viability

- 6.54 Sites should be available at market value.

c) Availability

- 6.55 If a suitable off site housing location is identified, it should be available both for acquisition and delivery without significant delay. This will help to demonstrate that there is a reasonable prospect that housing will be delivered.

d) Suitability

- 6.56 It will be necessary to demonstrate that the donor site is suitable to accommodate housing. Consideration should be given to factors such as any applicable land use requirements or restrictions, the characteristics of the site, the nature of surrounding uses and the site's accessibility to local services. All sites should be considered including cleared sites, redevelopment or intensification opportunities and changes of use. LBC

policy advises that housing provided as part of a mixed use scheme should be independent of other uses and have a separate access at street level or other arrangements which provide for occupation independent of any non-residential use.

e) Floorspace & Affordable Housing Requirements

6.57 The search has to include a wide variety of sites.

Summary

6.58 An off site housing site search exercise has been undertaken in accordance with the parameters set out above. The exercise has concluded that there are no available sites within the identified search area that could deliver the housing requirement generated by LBC Policy DP1 from the CTHA application. In reaching this conclusion, an extensive development site search has been undertaken by GM Real Estate within the prescribed area, which included:

- Search of Costar Propex online investment sales register.
- Search of the Estates Gazette Interactive online database of investment sales.
- Details of the requirements e-mailed directly to the property agents believed to be most active within the prescribed search area:
 - Anton Page
 - Burlington Partners
 - Farebrother
 - Hatton Real Estate
 - Pilcher Hershman
 - Richard Susskind & Co
 - Robert Irving & Burns
 - Springer Nicholas

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- Stirling Ackroyd
 - TSP UK
 - Details of the requirement circulated to 390 property agents' officer/departments throughout Central London via the Estate Agents Clearing House (EACH).
- 6.59 The search highlighted eleven potential sites. Details of each of these and their policy compliance conclusions are set out below, with more comprehensive detail set out in the GM Real Estate Site Search Summary document (Appendix 2):
- a) Site 1 – Saffron Court, 14b St. Cross Street

Let to NCP for further 50 years so no opportunity for immediate possession.
 - b) Site 2 – Fitzroy House, 355 Euston Road

Office building fully let until 2018, so no opportunity for immediate possession. Also, floor area significantly in excess of that required to satisfy Policy DP1.
 - c) Site 3 – Eagle House, 16 Proctor Street

Office accommodation which is likely to be continued in office use.
 - d) Site 4 – Parker House, 25-37 Parker Street

Planning Consent for private residential use already in place. Advised, by LBC Officers, that sites with consent are not appropriate to include within the search.
 - e) Site 5 – Aviation House, 125 Kingsway

Various lease arrangements which mean building not available immediately.
 - f) Site 6 – Hend House, 233 Shaftesbury Avenue

Building recently refurbished as offices and let until 2024.
 - g) Site 7 – Buchanan House, 24-30 Holbon, EC1N 2HS

Sold with a long term office lease in place: not suitable for residential conversion in the short term. Also, floor area significantly in excess of that required to satisfy Policy DP1.

- h) Site 8 – Herbal House, 6-10 Back Hill, London, EC1R 5EN

Sold – no longer available.

- i) Site 9 – 297 Euston Road, London, NW1 3AQ

On market and available, however, residential planning consent is already in place. Advised, by LBC Officers, that sites with consent are not appropriate to include within the search.

- j) Site 10 – 21 Bloomsbury Street, London, WC1B 3SS

Under offer – no longer available. Long term office lease in place.

- k) Site 11 – Bidborough House, 20 Mabledon Place, London, WC1H 9BF

Exchanged – no longer available. Long term office lease until 2022.

6.60 With regards to GM Real Estate approaching other property agents, a copy of the 'Investor Requirement' document is provided within the GM Real Estate Report. Through this exercise, three sites within the prescribed area were received. However, these are not considered to be appropriate to satisfy Policy DP1, for the following reasons:

- a) 297 Euston Road, N1

Under offer and has planning consent already in place for conversion to majority residential use.

- b) 123-129 Grays Inn Road, WC1

Under offer but the occupational lease expires September 2033 subject to tenant only options to determine firstly between December 2016 and December 2017, and again at September 2023, with no certainty that an incoming owner could secure vacant possession prior to the lease expiry date.

- c) 156 – 164 Gray's Inn Road, WC1 & Panther House, 38 Mount Pleasant, WC1

Under offer and the total floor area is significantly in excess of that required to satisfy the mixed use policy.

d) Fox Court, 14 Gray's Inn Road, WC1

On market and available but the total floor area is significantly in excess of that required to satisfy the mixed use policy. Lease arrangements also prevent an investor from obtaining full VP.

e) Weston House, 242-246 High Holborn, WC1

Under offer – ahead of asking price. The total floor area is also significantly in excess of that required to satisfy the mixed use policy.

- 6.61 GM Real Estates, on behalf of the applicant, have carried out an extensive search in accordance with the parameters agreed with LBC officers. This search has not resulted in any development site coming forward that would be suitable for the provision of residential accommodation in accordance with the requirements of Policy DP1. As such, it is considered that in this instance, a payment in lieu accords with policy.

Assessment – Payment in Lieu of Housing Provision

- 6.62 As set out above, payments-in-lieu will only be accepted under exceptional circumstances where provision cannot practically be made on site and the applicant demonstrates that no alternative site is available in the area. This Statement sets out a reasoned justification as to why on site residential provision cannot be accommodated whilst the off site housing site search exercise that has been undertaken demonstrates that there are no sites available that meet with the specified criteria or parameters of that exercise. Accordingly, a payment in lieu of physical provision is considered appropriate in this particular instance.
- 6.63 Camden Planning Guidance 8: Planning Obligations provides guidance on calculating the payment in lieu. Where the payment is in lieu of housing under Development Policy DP1, calculations of the payment will proceed as follows:
- the additional floorspace proposed will be multiplied by the 50% target for on-site housing to produce a floorspace target (GEA);

- where the additional floorspace proposed is less than 2,000 sq m(GEA):
 - the on-site housing floorspace target is less than 1,000 sq m (GEA).
 - consequently no contribution to affordable housing would be sought under policy DP3.
 - the target for on-site housing floorspace will be multiplied by the payment per square metre figure of £700.

6.64 Therefore, based on a requirement to provide 957 sqm of on site housing floorspace, the required payment in lieu would be £669,900.00 which could be invested in affordable housing or other forms of housing by the Council.

Urban Design

6.65 CTHA is attached to the grade II listed Camden Town Hall and is within the King's Cross Conservation Area and adjacent to the Bloomsbury Conservation Area. It is opposite St Pancras Station and St Pancras Chambers and close to King's Cross Station, all of which are listed buildings. The CTHA building is identified by the Council as one that makes a negative contribution to the conservation area. As well as being in a highly sensitive location in terms of historic heritage, it is also located in a very prominent location on a main road and close to 2 major railway stations and the Eurostar terminus.

Policy Summary

6.66 The NPPF outlines a number of core planning principles which include the requirement to always seek to secure a high quality design and a good standard of amenity for all existing and future occupants of land and buildings (Para 17).

6.67 Good design is identified in the NPPF as a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people (Para 56). The NPPF (Para 58) states that planning policies and decisions should aim to ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

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- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
 - Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
 - Are visually attractive as a result of good architecture and appropriate landscaping.

6.68 In determining applications, authorities are also encouraged to give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area (Para 63). Permission should be refused for development of poor design that fails to take account of opportunities available for improving the character and quality of an area and the way it functions (Para 64).

6.69 Policy 7.1 of the London Plan states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. Policy 7.2 further states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. The principles of inclusive design which seek to ensure that developments achieve the following are supported by London Plan Policy 7.2 and have been addressed throughout the evolution of the development proposals for the Site:

- Developments that can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances;

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- Developments that are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;
 - Developments that are flexible and responsive, taking account of what different people say they need and want, so people can use them in different ways; and
 - Developments that are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

6.70 Policy 7.4 of the London Plan goes on to state that developments should have regard to the form, function and structure of an area, including the scale, mass and orientation of buildings. The policy further states that buildings should provide contemporary architectural responses that:

- Have regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass;
- Contribute to a positive relationship between the urban structure and local natural landscape features;
- Are human in scale;
- Allow existing buildings and structures that make a positive contribution to the character of a place to influence the existing character of the area; and
- Are informed by the surrounding historic environment.

6.71 Policy 7.6 of the London Plan further states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to its context.

6.72 LBC Core Strategy Policy CS14 (Promoting high quality places and conserving our heritage) states that the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:

- requiring development of the highest standard of design that respects local context and character;

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- preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
 - promoting high quality landscaping and works to streets and public spaces;
 - seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
 - protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.

6.73 Policy DP24 (Securing high quality design) states that the Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility.

6.74 LBC have prepared their Camden Planning Guidance (CPG) to support the policies in the local plan. CPG1 relates to guidance on Design. The guidance promotes design excellence and covers a range of topics such as housing, sustainability, amenity and planning obligations.

Assessment

- 6.75 The application is accompanied by a Design and Access Statement prepared by ORMS Architects, a Historic Buildings Report by Donald Insall Associates and a Townscape and Visual Impact Assessment by Professor Robert Tavenor Consultancy.
- 6.76 In evolution of the design process has resulted in a proposals that:
- Replace the glazing at ground floor to create a better connection between the building and the public realm
 - Place the entrance, retail and lobby at ground floor to create a more active street frontage
 - Extend the façade line on Euston Road to reduce the overhang and improve connection with the street
 - Open up the existing garden and create an east-west shared pedestrian and cycle route
 - Narrow the existing ramp and repair the crossover pavement to reduce the visual impact of the ramp and to make the pavement pedestrian priority
 - Remove the west core staircase and thereby open up a route and views down Tonbridge Street
 - Replace the existing tinted windows with clear glass
 - Remove the existing concrete plant room from 8th floor
 - Extend the building by two floors from the existing top of roof plant with new hotel accommodation
 - Provide 270 hotel rooms and associated hotel ancillary space
- 6.77 The application proposes to retain the existing building. The CTHA building was designed in the Brutalist Style, which was relatively common in the 1970s. The style was a combination of 'constructional honesty' blended with sculptural forms.

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- 6.78 The building is a landmark on Euston Road and is an interesting example of the era. Whilst many find the style hard to appreciate, there is a growing admiration for good examples with several being cleverly adapted and revitalised such as the Barbican Tower and public space (further examples are in the D&A document).
- 6.79 The proposal has been designed in response to the character of the area and the negative elements of the existing building. The existing building is noted as a negative contributor to the Kings Cross Conservation Area and it is also acknowledged that the building creates a poor frontage to the street scene and public realm. The proposals seek to address this by re-proportioning the building and introducing floor to ceiling clear glazing with animated uses behind (i.e. hotel lobby and ancillary retail units). This will allow for clear views in and out of the building and will create activity around the building edges. This additional activity will add a vibrancy to the building which is currently lacked.
- 6.80 The ground floor of the building will also be opened up through the demolition of the western staircore and the entrance to the Camden Centre (subject to separate Listed Building Consents). This will allow increased permeability between Camden Town Hall and the Annexe through to Tonbridge Street. The design also allows for an east to west route through the rear garden area connecting Tonbridge Street to Argyle Street. Overall, the design would result in significant improvements to permeability around the site.
- 6.81 The proposals would result in the existing building receiving a light clean as well as replacing all of the existing dark glazing with clear glass. This simple treatment is considered to respect the existing architectural language of the building whilst providing a more appealing visual appearance which will be an improvement to the current facade.
- 6.82 The main alteration to the existing building will be the addition of the roof top extension consisting of three floors of hotel accommodation and amenities. The additional storeys take reference from the host building and aim to enhance the proportions of the building below. The 8th floor provides a band of glazing to create a visual break between the existing building and the more contemporary extension. The two upper floors follow the rhythm of the concrete skin below and are fragmented into bays. They are to be built from a combination of glass and bronze-like metal panels. Overall the extension helps to improve the proportions of the building below.

- 6.83 The proposed extension has also taken suitable cues from the Grade I Listed St Pancras Station. This is through the use of the bronze-like metal panels which seek to provide a reference to the brick colour of this important neighbouring building. However, it is acknowledged that the proposed extension is an unashamedly contemporary design which is a deliberate design so as not to compete with nearby important heritage assets.
- 6.84 Overall, it is considered that the proposed design would provide significant public realm improvements and would result in a roof top extension of high quality design that is sympathetic and informed by context, in accordance with the NPPF and LBC Policies CS14 & DP24.

Heritage and Archaeology

- 6.85 The application site is located in the King's Cross Conservation Area which extends northwards. To the south is the adjacent Bloomsbury Conservation Area. The King's Cross Conservation Area Statement identifies the town hall extension as making a negative contribution to the conservation area with paragraph 4.2.97 stating that the extension is "particularly prominent in the street scene".
- 6.86 Importantly, there are also a number of listed buildings in close proximity to the site. In particular the following are notable:
- The adjoining Town Hall is listed at grade II.
 - St Pancras Station and Kings Cross Station on the north side of Euston Road are grade I listed.
 - The Great Northern Hotel and the Lighthouse Building to the north east are grade II.
 - Terraced housing to the south and east on Argyle Street, Belgrove Street and around Argyle Square are grade II.
 - Argyle Square is listed in the London Square's Preservation Act, 1931.
- 6.87 Full details and assessment of these heritage assets are set out in the Historic Buildings Report by Donald Insall Associates and a Townscape and Visual Impact Assessment by Professor Robert Tavenor Consultancy.

Policy Summary

- 6.88 The NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
- 6.89 Policy 2.11 (Central Activities Zone – strategic functions) of the London Plan states that the Mayor, amongst other things, will, and boroughs and other relevant agencies should seek solutions to constraints on office provision and other commercial development imposed by heritage designations without compromising local environmental quality, including through high quality design to complement these designations.
- 6.90 Policy 7.8 (Heritage Assets and Archeology) of the London Plan states that:
- Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
 - Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 6.91 LBC Policy DP25 (Conserving Camden's heritage) states the following:

Conservation areas

In order to maintain the character of Camden's conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;

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- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
 - c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
 - d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
 - e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

Listed buildings

To preserve or enhance the borough's listed buildings, the Council will:

- f) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- g) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- h) not permit development that it considers would cause harm to the setting of a listed building.

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets

The Council will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

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- 6.92 The application site is located within the Kings Cross Conservation Area and adjoins the Bloomsbury Conservation Area. LBC adopted conservation area appraisals for these areas in December 2003 and April 2011 respectively.
- 6.93 The King's Cross Conservation Area was initially designated by the Greater London Council (GLC) in March 1986. The designation straddled the boundary between Camden and Islington and included the Conservation Area to the east of York Way. The Conservation Area has been enlarged on two occasions since 1986. In 1991, the boundary was extended to the south of Euston Road to include the area between Judd Street, Argyle Street, Swinton Street and King's Cross Road. The Conservation Area was extended to the North West in 1994 to include the area surrounding St Pancras Gardens.
- 6.94 The application site falls within sub-area 3 of the King's Cross Conservation Area appraisal where the existing CTHA building is described as "The eight-storey Town Hall Annexe to the east of the Town Hall is particularly prominent in the street scene. The addition was built in 1974 and is constructed of concrete with five curved bays containing large single paned windows and a taller western stairwell. At ground floor level, the building is significantly recessed beneath the overhanging first floor". The existing site is noted to be a negative contributor to the character of the conservation area.
- 6.95 Bloomsbury Conservation Area covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east. Bloomsbury is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area. Despite Bloomsbury's size and varying ownerships, its expansion northwards from roughly 1660 to 1840 has led to a notable consistency in the street pattern, spatial character and predominant building forms. Today, the area's underlying townscape combined with the influence of the major institutional uses that established in the district and expanded over time is evident across the large parts of the conservation area. Some patterns of use have changed over time, for example, offices and hotels came to occupy former family dwelling houses as families moved out of central London to the suburbs during the later 19th and 20th centuries.

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- 6.96 The application site adjoins sub-area 13 of the Bloomsbury Conservation Area where the interest is derived from the formal early 19th century street pattern and layout of open spaces, and the relatively intact surviving terraces of houses.

Assessment

- 6.97 The Donald Insall Historic Building Report concludes that the proposed design would address the negative contribution the building currently makes to the townscape and surrounding conservation areas by undertaking a number of external works including improving access into and around the building, introducing activity at street level and clear glazing to animate the façade and improving the surrounding public realm. The extensions proposed at roof level would be visible and impact on surrounding views, particularly from Bloomsbury Conservation Area to the south, including the setting of the Victorian listed townhouses. However, the unashamedly modern addition has sought to unlock the architectural quality of the building's exposed structural style and sculptural form and enhance its Brutalist architectural style, emphasising the verticality of the bays and creating a landmark building which, as a whole, would contribute positively to the character of the conservation areas and be a worthy neighbour to the outstanding listed buildings which surround it.
- 6.98 New development should preserve or enhance the setting of listed buildings and the character and appearance of conservation areas. As a minimum, therefore, the impact of development on these heritage assets should be neutral to not engage the presumption within the Act against the grant of planning permission. It is considered, when viewed as a whole, the proposed works to the Town Hall Extension would provide a number of enhancements and as such would preserve the character and appearance of the Kings Cross Conservation Area and the setting of the listed buildings to all but the south of the site, which is considered to have a neutral impact. Therefore the presumption against the grant of planning permission within the Act is not engaged.
- 6.99 For further details relating to the impact of the proposals upon each individual heritage asset, please refer to the Historic Buildings Report and the Townscape and Visual Impact Assessment.

Inclusive Design

Policy Summary

- 6.100 Chapter 7 (Requiring Good Design) of the NPPF highlight that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 6.101 National Planning Policy Guidance states that an inclusive environment is one that can be accessed and used by everyone. It recognises and accommodates differences in the way people use the built environment. Good design can help to create buildings and places that are for everyone. Planning can help break down unnecessary physical barriers and exclusions caused by the poor design of buildings and places.
- 6.102 Inclusive design acknowledges diversity and difference and is more likely to be achieved when it is considered at every stage of the development process, from inception to completion. However it is often mistakenly seen as a Building Regulations issue, to be addressed once planning permission has been granted, not at the planning application stage. The most effective way to overcome conflicting policies and to maximise accessibility for everyone is for all parties to consider inclusive design from the outset of the process. This is particularly important when considering historic buildings and conservation, and highways. Thinking at the design stage about how the completed building will be occupied and managed can overcome many barriers experienced by some users. Too often the needs of users, including disabled people, older people and families with small children, are considered too late in the day.
- 6.103 Inclusive design should not only be specific to the building, but also include the setting of the building in the wider built environment, for example, the location of the building on the plot; the gradient of the plot; the relationship of adjoining buildings; and the transport infrastructure. Issues to consider include:
- proximity and links to public transport;
 - parking spaces and setting down points in proximity to entrances;

- the positioning and visual contrast of street furniture and the design of approach routes to meet the needs of wheelchair users and people with visual impairments; and
- whether entrances to buildings are clearly identified, can be reached by a level or gently sloping approach and are well lit.

6.104 London Plan Policy 7.2 (An inclusive environment) sets out that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design.

6.105 Following this theme, Policy DP29 (Improving Access) of LBC's Development Policies DPD states that the Council will seek to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities. As such, the Council will:

- a) expect all buildings and places to meet the highest practicable standards of access and inclusion;
- b) require buildings and spaces that the public may use to be designed to be as accessible as possible;
- c) expect facilities to be located in the most accessible parts of the borough;
- d) expect spaces between buildings to be fully accessible;
- e) encourage accessible public transport; and
- f) secure car parking for disabled people.

Assessment

6.106 The existing building is in an excellent location for access to public transport, discussed elsewhere in this statement. Additionally, the application allows for two disabled parking spaces within the basement of the proposed hotel.

6.107 The adaptations to the existing building and the roof top extension have been designed with principles of access in mind. The main entrance off Argyle Street will have ramped and stepped access and other entrances off Euston Road will be level. Internally, all public areas are on level access with lifts serving the building throughout.

6.108 The application proposes 7 disability access rooms or rooms that can be easily adapted for disabled use.

Crime Prevention

Policy Summary

6.109 The NPPF sets out that planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

6.110 London Plan Policy 7.3 (Designing out crime) sets out that development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In particular:

- a) routes and spaces should be legible and well maintained, providing for convenient movement without compromising security
- b) there should be an indication of whether a space is private, semi-public or public, with natural surveillance of publicly accessible spaces
- c) design should encourage a level of human activity that is appropriate to the location, incorporating a mix of uses where appropriate, to maximize activity throughout the day and night, creating a reduced risk of crime and a sense of safety at all times
- d) places should be well designed to promote a sense of ownership and respect
- e) places, buildings and structures should incorporate appropriately designed security features
- f) schemes should be designed with on-going management and future maintenance costs of the particular safety and security measures proposed in mind.

The above measures should be incorporated at the design stage to ensure that overall design quality is not compromised.

Assessment

6.111 The existing building has dark windows with little contact between the inside and outside, the existing garden is walled and locked permanently and the route through Tonbridge Walk from Euston Road is dark and confined with many hidden recesses. As such, the design team have met and consulted with the local Designing Out Crime Officer during the evolution of the scheme.

6.112 As a result of this consultation, the following improvements would be delivered to the area from a Secure by Design perspective:

- widen the gap between the Annex and the Old Town Hall to create a cleaner, more open route
- remove the tinted glass and create a transparent facade to connect the street with the inside of the building and thereby create passive overlooking of the public realm
- open up the garden and light the space well
- provide lighting through Tonbridge Walk
- gate off garden at night if required
- provide gates to the vehicular ramp
- the hotel ground floor will be manned 24 hours a day which will create natural surveillance
- security passes will be required to access guest areas

6.113 Overall, it is considered that the proposals would improve the accessibility, lighting and natural surveillance of the area than the current situation. As such, these proposals are considered to be compliant with the NPPF and London Plan Policy 7.3 in this regard.

Neighbouring Amenity

Policy Summary

- 6.114 Policy 7.6 of the London Plan requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including privacy and overshadowing.
- 6.115 Policy DP26 (Managing the impact of development on occupiers and neighbours) of Camden's Development Policies DPD states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors we will consider include:
- a) visual privacy and overlooking;
 - b) overshadowing and outlook;
 - c) sunlight, daylight and artificial light levels;
 - d) noise and vibration levels;
 - e) odour, fumes and dust;
 - f) microclimate;
 - g) the inclusion of appropriate attenuation measures.

Assessment

- 6.116 The application site is located within the Central Activity Zone and is on the southern side of Euston Road, a six lane highway. To the north of Euston Road are two large transport termini buildings as well as commercial premises such as hotels and shops. This part of the Kings Cross Area is bustling with activity so there are no residential amenity concerns as a result of the proposed development to the north of the site.
- 6.117 To the west of the site is Camden Town Hall. This is a civic building and does not contain any residential accommodation.

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- 6.118 To the south of the application site is Argyle Primary School, as well as residential accommodation on Tonbridge Street. The existing CTHA is approximately 27.5 m from the nearest residential façade on Tonbridge Street (No.27). This is in excess of the minimum distance (18m) between windows as set out in CPG6 in order to ensure that the privacy of neighbouring properties is maintained. Given that the proposals do not enlarge the footprint of the existing building, the proposals are compliant with LBC requirements in this regard. Furthermore, as part of this application, a full Daylight/Sunlight report completed by GVA Schatunowski Brooks has been submitted under separate cover. This report demonstrates that the proposed extensions have been designed so as to comply with the guidance contained within the BRE 'Site Layout Planning for Daylight/Sunlight; a guide to good practice'.
- 6.119 To the east of the application site are residential properties on Argyle Street, Euston Road and Belgrove Street. As above, the GVA Schatunowski Brooks Daylight/Sunlight report demonstrates that the proposals would not have a material detrimental impact upon the amenities of neighbouring properties, in compliance with the BRE guidelines. Additionally, the relationship between windows from these residential properties to the CTHA building will remain unchanged. Given the relationship to neighbouring residential properties, it is considered that the proposal would not result in undue harm in terms of overlooking or loss of privacy.
- 6.120 With regards to odours and fumes, the proposed development would not result in harm upon residential amenity. All kitchens and facilities to supply the food and beverage service of the hotel will be fitted out with the appropriate plant to ensure that there is no harm to residential amenity.
- 6.121 Given the above, it is considered that the proposed development would not result in harm upon residential amenity and is therefore in compliance with London Plan Policy 7.6, LBC DM Policy DP26 and CPG6.

Transport, Construction Management and Servicing

Policy Summary

- 6.122 The NPPF directs new development to locations that are highly accessible by public transport, walking and cycling, recognising that an integrated transport system is necessary to support a strong and prosperous economy (Para 31-35).

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- 6.123 The NPPF outlines that developments that generate significant amounts of movement should be supported by a Transport Assessment and Travel Plan. Plans and decisions should take account of whether:
- The opportunities for sustainable transport modes have been taken up, depending on the nature and location of the site, to reduce the need for major transport infrastructure;
 - Safe and suitable access to the site can be achieved for all people; and
 - Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe (Para 32).
- 6.124 London Plan Policy 6.1 seeks to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand. The London Plan also supports development that generates high levels of trips at locations with high public transport accessibility and capacity, either currently or via committed improvements.
- 6.125 Policy 6.3 requires applications for new development to detail the impacts on transport capacity and that development should not compromise highway safety. Policy 6.9 seeks to facilitate an increase in cycling in London and requires that new development provides for the needs of cyclists.
- 6.126 Policy 6.10 seeks an increase in walking in London through the provision of high quality pedestrian environments. Policy 6.13 states the objective for promoting new development while preventing excessive car parking provision and states that new development should accord with the London Plan car and cycle parking standards. Maximum car parking standards are set out in Table 6.2 of the Parking Addendum to the London Plan.
- 6.127 A key theme running through LBC's Core Strategy and Development Policies DPD's is the promotion of public transport and other sustainable modes of transport. Policy CS11 (Promoting sustainable and efficient travel) states that the Council will promote the delivery of transport infrastructure and the availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel, and

relieve pressure on the borough's transport network. In particular, the Council will promote improvements to encourage walking and cycling as part of transport infrastructure works.

6.128 Policy DP16 (The transport implications of development) states that the Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links and will resist development that fails to assess and address any need for:

- a) movements to, from and within the site, including links to existing transport networks. The Council will expect proposals to make appropriate connections to highways and street spaces, in accordance with Camden's road hierarchy, and to public transport networks;
- b) additional transport capacity off-site (such as improved infrastructure and services) where existing or committed capacity cannot meet the additional need generated by the development. Where appropriate, the Council will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts, for example using transport assessments and travel plans;
- c) safe pick-up, drop-off and waiting areas for taxis, private cars and coaches, where this activity is likely to be associated with the development.

6.129 Policy DP17 (Walking, cycling and public transport) then goes on to add that the Council will promote walking, cycling and public transport use. Development should make suitable provision for pedestrians, cyclists and public transport and, where appropriate, will also be required to provide for interchanging between different modes of transport.

6.130 Furthermore, Policy DP17 adds that the Council will resist development that would be dependent on travel by private motor vehicles.

6.131 With regards to parking, Policy DP18 (Parking standards and limiting the availability of car parking) highlights that the Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area and development should comply with the Council's parking standards.

C1 Hotels	
Cycles	Staff – from threshold of 500sqm, 1 space per 500 sqm thereof. Customer – from threshold of 500sqm, 1 space per 500sqm thereof
People with Disabilities	Staff / operational – 1 space per disabled employee or, from a threshold of 2,500sqm, 1 space per 20,000 sqm of part thereof – whichever is greater. Customer – from threshold of 2,500sq, 1 space per 1,250 sqm of part thereof.
Service Vehicles	Required above 2,500 sqm – one 3.5m x 8.5 m bay.
Coaches	Above 2,500sqm – the Transport Assessment required under policy T1B / Appendix 2 will be required to consider the need for space for coaches to pick-up/set-down and wait.
Taxis	Pick-up/set-down bay adequate for 2 required above 2,500 sqm, with any departure justified by a Transport Assessment.
Other staff/operational parking	Low parking provision areas: maximum of 1 space per 1,500sqm Rest of borough: maximum of 1 space per 1,000sqm.
Other resident parking	Only considered if supported by a Transport Assessment (or supporting information as appropriate for smaller schemes) showing that existing spaces, public transport and coaches/taxis cannot cater for the expected travel demand, and a Travel Plan can be secured.

(Extract from Appendix 2 of Camden Development Policies DPD – Parking Standards)

6.132 With regards to construction traffic and future servicing of the hotel, Policy DP20 (Movement of goods and materials) states that in order to minimise the movement of goods and materials by road the Council will:

- a) expect development that would generate significant movement of goods or materials both during construction and in operation to minimise the movement of goods and materials by road, and consider the use of more sustainable alternatives such as rail and canal links;
- b) promote the development and use of freight consolidation facilities and other initiatives with potential to reduce the impact of goods vehicles, and encourage the use of cycle courier services for local deliveries; and
- c) seek to promote and protect facilities for the movement of goods by rail and water, including facilities for transfer between road, rail and canal.

6.133 Additionally, the Council will expect development that would generate significant movement of goods or materials by road, both during construction and in operation, to:

- d) be located close to the Transport for London Road Network or other Major Roads;
- e) avoid any additional need for movement of vehicles over 7.5 tonnes in predominantly residential areas;
- f) accommodate goods vehicles on site; and
- g) seek opportunities to minimise disruption for local communities through effective management, including through the optimisation of collection and delivery timings and the use of low emission vehicles for deliveries.

Assessment

6.134 A full Transport Assessment, Travel Plan, Servicing Management Plan and Construction Management Plan have been submitted as part of this application under separate cover. For full transport details, please refer to these documents.

6.135 The application site is within a highly accessible location with a PTAL of 6b. The site is extremely well served by train services, London Underground and London Buses. Additionally, Argyll Street to the east of the site is designated as a Metropolitan Walk within the Council's Local Plan. As such, this is a highly sustainable and appropriate location for a hotel.

6.136 To establish the impact the proposed development would have on the local highway network and pedestrian infrastructure, extensive discussions have been entered into with both LBC and Transport for London (TfL), who act as highway authority for Euston Road which bounds the site to the north.

6.137 The proposed development would result in the provision of 270 bedrooms within the hotel and will be a car free development, albeit except for 2 disabled parking bays in the basement. Further to this, the development proposes the provision of 72 cycle parking spaces, these will comprise:

- 4 Sheffield stands externally (existing but relocated to Tonbridge Walk) - 8 spaces
- 64 racks in Basement (level 1) - 64 spaces

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- 6.138 With regards to evaluating the impact of the proposed development, extensive survey data has been collated relating to the previous site use, the proposed site use and the existing pedestrian flows locally, in order to robustly assess the development's anticipated impact in comparison to that of the site's previous use. The development proposals would represent a significant decrease in total person trips when compared to the site's previous use, albeit there would be a slight increase in total vehicle movements, relating primarily to taxi visits, which would have a negligible impact on highway capacity, the full details of which are set out in the Transport Assessment.
- 6.139 The Transport Assessment demonstrates that there is capacity within the existing highway network to accommodate a slight increase in traffic movement which would come from taxi visits. Additionally, it has been recognised by the Applicant and their Design Team that this is a highly accessible location and therefore there is no requirement for private vehicle parking. The proposed development is also fully compliant in the provision of cycle parking requirements which would be located both on-street and in the hotel basement. As such, the development is clearly delivering the objectives of the NPPF, London Plan and the LBC Core Strategy which seek to promote the most sustainable modes of transport.
- 6.140 With regards to safe pick ups and drop offs at the hotel, it is proposed for minor alterations be made to Argyle Street to provide a drop-off / pick-up lay-by in place of the two existing disabled bays. This arrangement would ensure deliveries and drop-off activity do not impact detrimentally on local highway safety and would not impede the through-flow of traffic on Argyle Street. Additionally, deliveries to the hotel would be accommodated within the basement level service yard, able to accommodate two delivery vehicles simultaneously, ensuring all delivery activity would take place off-street. A full Delivery and Servicing Management Plan has been submitted to demonstrate that the servicing and operations of the hotel would not have a harmful impact upon the highway network and its capacity.
- 6.141 The application also includes a Construction Management Plan which sets out measures to reduce the impact of the construction of the development on the local highway network. It is considered that the effect of construction vehicles on vehicular flows on the surrounding roads is negligible. These appropriate mitigation measures will be agreed with LBC to limit any effects during the construction process.

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- 6.142 A Travel Plan has been produced which sets out the site wide management structure for the site and outlines the sustainable travel principles and measures to be incorporated within the proposals. It also sets out the ongoing monitoring and targets for the Travel Plan.
- 6.143 In summary, the proposed development benefits from excellent levels of public transport accessibility, pedestrian provision and cyclist provision. In addition, it is demonstrated that the trips generated by the proposed development for each mode of transport could be accommodated on the surrounding transport infrastructure. As such, the proposed development is considered to be in accordance with the relevant transport policies at national, regional and local levels. Further detail on the effect of the proposed development in transport terms is provided in the Transport Assessment.

Waste and Recycling

Policy Summary

- 6.144 There are no specific waste policies within the NPPF.
- 6.145 LBC Policy CS18 (Dealing with our waste and encouraging recycling) states the Council will seek to make Camden a low waste borough by:
- a) aiming to reduce the amount of waste produced in the borough and increase recycling and the re-use of materials to meet our targets of 40% of household waste recycled by 2010, 45% by 2015 and 50% by 2020;
 - b) making sure that developments include facilities for the storage and collection of waste and recycling.
- 6.146 Chapter 10 of the LBC's Design Supplementary Planning Document (CPG1) states that in planning and designing developments, the following should be accommodated:
- adequate space (designed) for the storage of waste and recyclables;
 - safe location - accessible for all users and collectors and minimise nuisance to occupiers and neighbours (and their amenity space) e.g. noise, obstruction, odours, pests, etc;

- refuse collection for any waste contractor (and allow for reasonable changes to collection services in the future);
- containers should have designated storage areas; and
- sensitively designed/located, especially in conservation areas/or listed buildings.

6.147 Additionally, the guidance goes on to add that for commercial developments the volume of waste generated and thus the number and type of containers that a commercial development requires is ultimately dependent on the use of the building. Where an extension or change of use to an existing property is proposed, this may result in the removal of existing container storage areas, typically, to the rear of a property. This may be acceptable provided that an alternative storage area is designated as part of the proposed development.

6.148 With regards to these specific space requirements

- Internal collection and storage points should always be considered for all types of waste to maximise the amount of recyclable material.
- External storage must be provided in most cases. As a guide, approximately one cubic metre storage space is required for every 300-500 sqm of commercial space (includes both recyclable and non-recyclable waste). Storage space must be designed to accommodate bins to hold this amount of waste, separated, and should be designed in consultation with the waste collection contractor.
- Even if a recyclables collection program is not proposed, space must be allocated to locate bins for storage of likely recyclable waste. For example, in any office development, space should be allocated for storage of recycling bins for waste paper.

Assessment

6.149 It is important to the end user that the refuse storage is in a safe and easily accessible location, as well as providing necessary capacity to service the functions of the hotel and its ancillary uses. In this regards, the proposed design has been worked up alongside the proposed end user to ensure provision is adequate.

6.150 The refuse and recycling storage will be located within the basement, accessed off the service yard. This will allow for easy access for refuse vehicles to enter the basement, via the ramp, in forward gear and exit in forward gear post refuse collection.

6.151 The refuse storage has been designed with the Council's policies in mind to ensure that there is adequate space and is located in a safe place and accessible for all users which would minimise disruption and nuisance to neighbouring occupiers. Further details of the refuse storage can be found in the submitted Design and Access Statement and the Delivery and Servicing Plan.

Sustainability, Climate Change and Water Saving

Policy Summary

Energy

6.152 Paragraphs 93 to 97 of the NPPF underpin the Government's priority in delivering sustainable development. In line with the NPPF, development proposals are expected to comply with local requirements and should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and to increase the use and supply of renewable and low carbon energy.

6.153 Policy 5.2 of the London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide (CO₂) emissions in accordance with the following energy hierarchy:

- Be Lean: use less energy;
- Be Clean: supply energy efficiency; and
- Be Green: use renewable energy.

6.154 Policy 5.2 also sets out a target reduction in CO₂ emissions for non-residential buildings of 40% between 2013 and 2016. The priority is for CO₂ reduction targets to be met on-site. However, where it can be demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a payment in lieu contribution.

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- 6.155 Policy CS13 (Tackling climate change through promoting higher environmental standards) of the LBC Core Strategy echoes these policies and requires that all development should take measures to minimise the effects of, and adapt to, climate change and they will encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation by:
- a) ensuring patterns of land use that minimise the need to travel by car and help support local energy networks;
 - b) promoting the efficient use of land and buildings;
 - c) minimising carbon emissions from the redevelopment, construction and occupation of buildings by implementing, in order, all of the elements of within the energy hierarchy.
 - d) ensuring buildings and spaces are designed to cope with, and minimise the effects of, climate change.
- 6.156 Policy DP22 (Promoting sustainable design and construction) of the LBC Development Management Policies states that the Council will promote and measure sustainable design and construction by expecting non-domestic developments of 500sqm of floorspace or above to achieve "very good" in BREEAM assessments.
- 6.157 LBC has adopted and published guidance on sustainability matters for new development in their CPG3 (Sustainability). The primary aim of this document is to reduce carbon emissions through setting out guidance in accordance with the energy hierarchy. Some methods of achieving this are through the use of natural systems such as making the most of natural sunlight; through increased thermal performance by improving insulation; or by the use of efficient mechanical heating systems and heat recovery units.
- 6.158 With regards to existing buildings, development involving a change of use or a conversion of 5 or more dwellings or 500sq m of any floorspace, will be expected to achieve 60% of the un-weighted credits in the Energy category in their BREEAM assessment.
- 6.159 Section 5 of CPG3 provides guidance on Decentralised Energy Networks (DEN) and Combined Heat and Power (CHP) installations. With regard to DEN's and CHP installations, the CPG sets out a policy hierarchy. Firstly, development will be expected to connect to a decentralised energy network and use the heat unless developers can demonstrate it is

not technically feasible or financially viable. Where this is shown to be the case, developments are expected to include an on-site CHP unit, including exporting heat where appropriate. If this is not feasible then the last option would be to provide a contribution to the expansion of DEN elsewhere.

Water

- 6.160 One measure of sustainability relates to water use and flood risk. Para 103 of NPPF states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere.
- 6.161 London Plan Policy 5.13 (Sustainable Urban Drainage) states that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:
- a) store rainwater for later use
 - b) use infiltration techniques, such as porous surfaces in non-clay areas
 - c) attenuate rainwater in ponds or open water features for gradual release
 - d) attenuate rainwater by storing in tanks or sealed water features for gradual release
 - e) discharge rainwater direct to a watercourse
 - f) discharge rainwater to a surface water sewer/drain
 - g) discharge rainwater to the combined sewer.
- 6.162 Further to the above requirements Policy DP23 (Water) of the Council's Development Management Policies requires developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding by:
- a) incorporating water efficient features and equipment and capturing, retaining and re-using surface water and grey water on-site;

- b) limiting the amount and rate of run-off and waste water entering the combined storm water and sewer network through the methods outlined in part a) and other sustainable urban drainage methods to reduce the risk of flooding;
- c) reducing the pressure placed on the combined storm water and sewer network from foul water and surface water run-off and ensuring developments in the areas identified by the North London Strategic Flood Risk Assessment.

6.163 The Council's Sustainability Guidance (CPG3) reiterates the drainage hierarchy to ensure that developments are considering the appropriate mitigation measures through the design process.

Assessment

6.164 Full Energy Strategy and Sustainability Reports, prepared by Arup's, have been submitted under separate cover. For full energy and sustainability details, please refer to these reports.

6.165 These reports demonstrate that the proposal is acceptable with regards to energy and sustainability matters. The application will achieve BREEAM standard 'very good' as required by LBC Policy DP22

6.166 Additionally, a full feasibility study has been undertaken with regards with the policy hierarchy requirements for Decentralised Energy Networks (DEN) and CHP systems. The Energy report concludes that the site would be within the vicinity of a DEN but we have been informed that to connect to the Euston Network to the north would not be financially viable. This is because of the cost required to tunnel the necessary pipes under Euston Road and the subsequent highway issues that would ensue. The same problems can account for the Kings Cross DEN. However, the application does propose a CHP system with the basement of the CTHA which will provide heat and power to the hotel.

6.167 With regards to drainage and water use, the development proposes to use grey water harvesting to reduce potable water use. This will collect water from showers which will then be treated and used for toilet flushing. Surface water run-off will be reduced from the existing site condition through the use of landscaping and a "blue roof" system which attenuates water within the roof build up during periods of heavy rainfall.

6.168 Overall, it has been demonstrated that the proposals have been designed so as to include the appropriate sustainability measures whilst working within the constraints of an existing building. Measures for renewable energies and rainwater harvesting are incorporated in accordance with national, regional and local policy and guidance. As such, it is considered that the proposals satisfy policies of energy and sustainability matters. For full details, please see Sustainability and Energy Strategy reports.

Trees and Landscaping

Policy Summary

- 6.169 London Plan Policy 7.21 (Trees and woodlands) requires that existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.
- 6.170 Camden Core Strategy Policy CS14 (Promoting high quality places and conserving our heritage) promotes high quality landscaping in new developments. Paragraph 14.18 of the sub-text adds that high quality landscaping plays an important role in the attractiveness and character of the area. It can improve the setting of buildings, bring trees and other greenery into built-up areas to relieve the hard landscaping and provide shade, and provide habitats for wildlife. The Council expects development schemes to provide a high standard of landscaping and boundary features.
- 6.171 Through the implementation of Policy DP24 (Securing high quality design) the Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider the provision of appropriate hard and soft landscaping including boundary treatments.

Assessment

- 6.172 A full Tree Report including Arboricultural Impact Assessment and Method Statement, prepared by ACD Arboriculture, has been submitted in support of this application under separate cover.
- 6.173 A total of eight individual trees with stem diameters of 75mm and above at 1.5m were surveyed and recorded.

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- 6.174 There are four B category London Plane trees on the corner of Argyle Street and Euston Road, an A category mature London Plane on nearby Bidborough Street, a London Plane and two Honey Locust trees within the garden area which are C category.
- 6.175 Three trees are to be removed and mitigation planting provided as part of the landscape proposals for the scheme. The trees are all C category, and are not of a quality that would represent a constraint to development. A better long term result will be achieved for the garden area with the removal of the trees, and replacement planting being provided.
- 6.176 Trees of A and B category should be considered as constraints to development and every attempt should be made to incorporate them into any proposed development design. Trees of a C and U category will not usually be retained where they would impose a significant constraint to development. U category trees are often in such a condition that they will be lost within 10 years, and may be removed as good arboricultural practice.
- 6.177 The development proposals are in accordance with BS5837:2012 'Trees in relation to design, demolition and construction – Recommendations'.
- 6.178 An indicative landscaping scheme has been submitted to the Council through the Design and Access Statement. It is envisaged that a condition requiring full landscape proposals will be required by condition in accordance with this indicative proposal.
- 6.179 It is therefore considered that the proposals are in compliance with Policies CS14 & DP24. However, for full tree and arboricultural details, please refer to the ACD Arboriculture report.

Noise and Vibration

Policy Summary

- 6.180 The NPPF seeks to prevent new development contributing towards noise pollution (Para 109).
- 6.181 In keeping with this, Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, a development and promoting new technologies and improved practices to reduce noise.

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- 6.182 Camden's Policy DP28 (Noise and Vibration) states that the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for:
- a) development likely to generate noise pollution; or
 - b) development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided.
- 6.183 Policy DP28 goes on to add that development that exceeds Camden's Noise and Vibration thresholds will not be permitted and that the Council will only grant permission for plant or machinery if it can be operated without cause harm to amenity and does not exceed our noise thresholds. Lastly, the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these phases are likely to cause harm, conditions and planning obligations may be used to minimise the impact.

Assessment

- 6.184 A full Noise Impact Assessment, carried out by Scotch Partners LLP, has been submitted in support of this planning application. As part of this assessment a comprehensive noise survey has been undertaken at a number of locations about the proposed development site.
- 6.185 It is highlighted that the development is not residential in nature but is a commercially operated hotel and the objective external noise level limits advised are not strictly applicable. The hotel is, however, to be designed in accordance with good practice and in line with hotel operators brand standards which align with those required by London Borough of Camden for residential accommodation.
- 6.186 Noise levels at the proposed development site are influenced by road traffic on Euston Road. This traffic generates high levels of noise particularly at low frequencies from the engines of buses and HGVs. Sirens from emergency vehicles are also regularly present.
- 6.187 Noise levels on Argyle Street to the east of the site are lower but the influence of noise from road traffic on Euston Road is still significant. In a similar manner to the west of the site noise levels in Tonbridge Walk are also lower than on Euston Road.

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- 6.188 To the rear of the site noise levels are significantly reduced where the buildings are screened from Euston Road. Noise levels here are however influenced by activity at the neighbouring school as children play in the playground during the morning and at lunch time.
- 6.189 The existing building suffers from high levels of noise and activity on the Euston Road side. Taking the noise survey results into account, residential development would not normally result in the grant of planning permission in this location. However, given the commercial nature of the proposals, with guests only staying for short periods at a time, it is considered that, with appropriate glazing and sound proofing, a hotel in this location is acceptable.
- 6.190 As the hotel is to be developed in a retained building there are few practical measures available for further controlling ground borne noise intrusion or vibration intrusion from traffic sources and the underground rail network. That said, vibration is not reported in the existing building and vibration sensitive uses such as bedrooms are not located in the basements or at ground floor. Given the juxtaposition of the building to the underground railway, neither the underground nor road traffic is expected to give rise to vibration levels with even a low probability of adverse comment.
- 6.191 Overall, the Scotch Partners report concludes that the proposed development has been designed so as to ensure that future hotel residents will be safeguarded from the noise and vibration generated by traffic and activity on Euston Road.
- 6.192 With regards to noise generation from the hotel itself, the principal items of noise generation are expected to be the air cooled chillers and ventilation plant. It is anticipated that LBC will reasonably condition noise emissions from any plant.
- 6.193 With regards to noise and vibration impacts it is considered that the proposals are compliant with the NPPF and LBC's Policy DP28. For full details, please refer to the Noise Impact Assessment.
- 6.194 In addition to the above measures, in order to minimise any potential impact upon residential amenity, a draft Hotel Management Plan has also been submitted as part of this application.

Air Quality

Policy Summary

- 6.195 The NPPF seeks to prevent new and existing development being adversely affected by unacceptable levels of air pollution (Para 109).
- 6.196 The London Plan and the Mayor's Air Quality Strategy (2010) seek to minimise the emissions of key pollutants and to reduce concentrations to levels at which no, or minimal, effects on human health are likely to occur. Policy 7.14 of the London Plan promotes an "air quality neutral" approach, where developments will not contribute to further deterioration of air quality.
- 6.197 Policy DP32 (Air quality and Camden's Clear Zone) notes that the Council will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality.
- 6.198 The Council will also only grant planning permission for development in the Clear Zone region that significantly increases travel demand where it considers that appropriate measures to minimise the transport impact of development are incorporated. Planning conditions and legal agreements can be used to secure Clear Zone measures to avoid, remedy or mitigate the impacts of development schemes in the Central London Area.
- 6.199 The whole of Camden is an Air Quality Management Area (AQMA) as it does not meet national air quality targets for nitrogen dioxide (NO₂) and particulate matter (PM₁₀). The main sources of air pollution in Camden are road transport and gas boilers. The Council's Air Quality Action Plan outlines measures to reduce emissions from the key sources of air pollution in the borough. Included in the plan are measures to minimise and control NO_x and PM₁₀ emissions associated with new developments both during the construction of a building and its future use.

Assessment

- 6.200 A full Air Quality Assessment report, carried out by Peter Brett Associates is submitted as part of this application under separate cover. Please see this report for full details.

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- 6.201 LBC has investigated air quality within its area as part of its responsibilities under the LAQM regime. The whole Borough has been declared an Air Quality Management Area (AQMA) for exceedences in nitrogen dioxide and PM10.
- 6.202 The construction works created to implement the development have the potential to create dust. During construction, it is therefore recommended that a package of mitigation measures is put in place to minimise the risk of elevated PM10 concentrations and dust nuisance in the surrounding area.
- 6.203 Pollutant concentrations in the Euston Road are high, especially nitrogen dioxide concentrations. Bedrooms within the hotel will therefore require mitigation for poor air quality up to the fifth floor level. Mechanical ventilation, with air drawn from the roof of the building, will be provided to meet this requirement.
- 6.204 An energy centre is to be installed to supply heating. Energy is to be provided by gas fired low NOx boilers which have emissions lower than the London Mayor's SPG requirements and a CHP unit which has emissions corresponding to Band B requirements. With stacks at 3m above the building, the short-term and long-term impacts of the energy centre are considered insignificant.
- 6.205 Taking the measures set out in the Peter Brett Associates Air Quality Report, it is demonstrated that the proposed development is in compliance with Policy DP32 of the Council's Development Management Policies.

7. Planning Obligations & Community Infrastructure

Levy

- 7.1 The NPPF emphasises that local authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations (Paragraph 203). In doing so, the NPPF reiterates the statutory tests set out in the Community Infrastructure Levy Regulations 2010 which requires obligations to achieve the following tests:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 7.2 Where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, where appropriate, be sufficiently flexible to prevent planned development being stalled (Paragraph 205).
- 7.3 The NPPF identifies that pursuing sustainable development requires careful attention to viability and costs in decision-taking. To ensure viability, the costs of any requirements likely to be applied to development should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (Paragraph 173). In order to be deemed appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle (Paragraph 174).
- 7.4 The London Plan 2011 identifies planning obligations as a tool for mitigating a range of planning matters. Policy 8.2 notes that when considering applications of strategic importance the Mayor will take into account, among other issues including economic viability of each development concerned, the existence and content of planning obligations. These should address strategic as well as local priorities.
- 7.5 LBC Core Strategy Policy CS19 (Delivering and monitoring the Core Strategy) states that the Council will work with Camden's Local Strategic Partnership and its other partners to

deliver the vision, objectives and policies of the Core Strategy and will use planning obligations, and other suitable mechanisms, where appropriate, to:

- support sustainable development,
- secure any necessary and related infrastructure, facilities and services to meet needs generated by development, and
- mitigate the impact of development.

7.6 In compliance with the development plan, the Planning Obligations Camden Planning Guidance (CPG 8) and the NPPF, the following Heads of Terms are proposed:

- Training and Employment matters including:
 - 1 apprentice for every £3m of construction costs. Construction costs are currently estimated at £30m. This equates to 10 apprenticeships throughout the course of the development.
 - To target that 20% of the workforce during the course of construction are from the local area.
 - Work placements through the course of the construction.
 - To work with the end user and ensure that opportunities with institutions such as Westminster and Kingsway College are fully explored in order to create employment opportunities in the hotel.
- Local Procurement
- The proposed development will be car free.
- The Green Travel Plan submitted can be secured by the LPA via the S.106 agreement.
- The Hotel Management Plan submitted can be secured via legal agreement to ensure that the management of the hotel is undertaken in a manner so as not to cause significant harm upon residential amenity.

- Contribution in lieu of housing provision, in accordance with Policy DP1, resulting in a sum of £669,900.
- 7.7 Other S106 contributions will be discussed and agreed with Council officers during the consideration of the application.
- 7.8 The application will also result in a Mayoral CIL payment of £95,700.

8. Overall Conclusion

- 8.1 This Planning Statement has been prepared in support of a full planning application made on behalf of Crosstree Real Estate Management Ltd for the redevelopment of the CTHA site in the corner of Argyle Street and Euston Road, in the London Borough of Camden.
- 8.2 This Statement demonstrates the planning case in support of the proposals in the context of the development plan and other material considerations.
- 8.3 The proposed development offers a significant opportunity for the re-development of a vacant brownfield site that has been declared surplus to their requirements by LBC. The re-development would result in the sustainable re-use of the existing building as well as providing enhancement to the appearance of the CTHA which is currently considered to detract from the character of the King's Cross Conservation Area. It should also be acknowledged that the development would provide much needed hotel accommodation in a highly accessible location.
- 8.4 The proposals will deliver the following key planning and regeneration benefits:
- Sustainability benefits through the retention and re-use of an existing vacant building.
 - The modernisation and visual improvements to the appearance of a building currently considered to detract from the character of the King's Cross Conservation Area.
 - Heritage improvements to the demolition of the existing stair core on the western elevation to allow the Grade II Listed Camden Town Hall building to stand-alone as originally constructed.
 - Demolition of the existing stair core on the western elevation would allow for views between the Town Hall and the annexe to be opened through from Euston Road and Tonbridge Street.
 - Public realm improvements to allow access around the entire building which would create greater legibility and wayfinding from north to south, thus enhancing the public realm.
 - The currently abandoned garden behind the annex will be transformed into a new permanent east-west route between Argyle Street and Tonbridge Street, for pedestrians and cyclists, as well as planted courtyard and seating.

- Creating active frontages to add vitality and vibrancy to a building which currently turns away from the street.
- A publicly accessible rooftop bar and restaurant will offer fantastic views of the surrounding area and adjacent heritage assets and fast-changing King's Cross.
- The creation of around 650 jobs for will be delivered from the hotel use with approximately 500 jobs during construction.
- Dialogue has already been undertaken with Westminster Kingsway College about the possibility of working with their hospitality course to offer training apprenticeships and jobs.
- A high quality design orientated hotel and restaurant adding local amenity for local residents and businesses.
- A 270 bedroom hotel contributing towards London's pressing need for increased provision of visitor accommodation.

8.5 The proposed development is considered to be in accordance with the development plan and other planning policy guidance and material considerations.

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Report

Appendix 1

Summary of
relevant
policies

National

National Planning Policy Framework

Foreword

Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision.

In order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.

Paragraph 14

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For decision-taking, this means approving development proposals that accord with the development plan without delay.

Paragraph 17

Sets out a number of core land-use planning principles which should underpin both plan-making and decision-taking; including:

- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.
- Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
- Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).
- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- Promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production).
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
- 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.

Paragraph 19

The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

Paragraph 32

States that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment and decisions should take account of whether:

- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- Safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that costs effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Paragraph 56

The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Paragraph 57

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

Paragraph 58

Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- Are visually attractive as a result of good architecture and appropriate landscaping.

Paragraph 60

Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

Paragraph 61

Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

Paragraph 63

In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.

Paragraph 73

Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

Paragraph 96

In determining planning applications, local planning authorities should expect new development to:

- comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Paragraph 131

In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 173

Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

Regional

London Plan (2011)

Policy 1.1

Growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without:

- a) encroaching on the Green Belt, or on London's protected open spaces
- b) having unacceptable impacts on the environment

The development of east London will be a particular priority to address existing need for development, regeneration and promotion of social and economic convergence with other parts of London and as the location of the largest opportunities for new homes and jobs.

Policy 4.5

The Mayor will seek to achieve 40,000 net additional hotel rooms by 2031. Beyond the CAZ, these should be focussed in town centres, opportunity and intensification areas where there is good public transport access to central London and international and national transport termini. 10% of bedrooms should be wheelchair accessible.

Policy 4.12

Strategic development proposals should support local employment, skills development and training opportunities.

Policy 5.2

Major development proposals should include a detailed energy assessment to demonstrate how the targets for CO₂ emissions reduction are to be met.

Policy 5.3

Development proposals should demonstrate that sustainable design standards are integral to the proposal. Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance.

Policy 5.6

Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites. Major development proposals should select energy systems in accordance with the following hierarchy: 1) Connection to existing heating or cooling networks 2) Site wide CHP network 3) Communal heating and cooling.

Policy 5.7

Major development proposals should provide a reduction in expected CO₂ emissions through the use of on-site renewable energy generation where feasible.

Policy 5.13

Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy set out in the London Plan.

Policy 5.14

Development proposals must ensure that adequate waste water infrastructure capacity is available in tandem with development.

Policy 5.18

Waste should be removed from construction sites, and materials brought to the site, by water or rail transport wherever that is practicable. Materials should be brought to site by water or rail transport where practicable. Waste should be removed from construction sites.

Policy 6.1

The Mayor will support developments that generate high levels of trips at locations with high public transport accessibility. The Mayor will encourage patterns and nodes of development that reduce the need to travel, especially by car.

Policy 6.3

Where existing transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans exist for an increase in capacity to cater for this, boroughs should ensure that development proposals are phased until it is known these requirements can be met, otherwise they may be refused. The cumulative impacts of development on transport requirements must be taken into account.

Transport Assessments will be required for major planning applications. Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance.

Policy 6.5

Contributions will be sought from developments likely to add to, or create, congestion on London's rail network that Crossrail is intended to mitigate - this will be through planning obligations. When considering relevant planning applications of potential strategic importance, the Mayor will take into account the existence and content of planning obligations supporting the funding of Crossrail among other material considerations.

Policy 6.9

Developments should provide secure, integrated and accessible cycle parking facilities in line with minimum standards; provide on-site changing facilities and showers for cyclists; facilitate the Cycle Super Highways; facilitate the central London cycle hire scheme.

Policy 6.10

Development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space.

Policy 6.12

Consideration should be had to the impact of development proposals on road capacity.

Policy 6.13

The maximum standards set out in Table 6.2 of the London Plan should be applied to all planning applications.

In addition, developments must ensure that 1 in 5 spaces provide an electrical charging point to encourage the uptake of electric vehicles; provide parking for disabled people in line with Table 6.2; meet the minimum cycle parking standards set out in Table 6.3 and provide for the needs of businesses for delivery and servicing."

Policy 7.1

Design of new development should interface with surrounding land and improve access to social and community infrastructure, the Blue Ribbon Network, local shops, commercial services, employment opportunities and public transport. Development should enable people to live healthy, active lives; maximise the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places should be designed to meet the needs of the community at all stages of people's lives. The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.

Policy 7.2

Design and access statements submitted with development proposals should explain how the principles of inclusive design have been integrated into the development, whether relevant best practice standards such as British Standard BS 8300:2009 have been complied with, and how inclusion will be maintained and managed.

Policy 7.3

Development should reduce opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In particular, by incorporating a mix of uses, activity is maximised day and night, creating a reduced risk of crime and a sense of safety at all times.

Policy 7.4

Buildings, streets and open spaces should provide a high quality design response that reflects local character.

Policy 7.5

Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate. Opportunities for greening (trees/soft landscaping) should be considered. Opportunities for the integration of high quality public art should be considered.

Policy 7.6

Buildings and structures should: be of the highest architectural quality; be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm; comprise details and materials that complement the local architectural character; do not cause unacceptable harm to the amenity of the surrounding area; incorporate best practice in resource management and climate change mitigation and adaptation; provide high quality indoor and outdoor spaces; be adaptable to different activities and land uses; meet the principles of inclusive design; optimise the potential of sites.

Policy 7.12

Development should have regard to designated views within the London View Management Framework.

Policy 7.13

Development should be designed to design out crime and deter terrorist activity.

Policy 7.14

Development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality; promote sustainable design and

construction to reduce emissions from the demolition and construction of buildings following the best practice guidance in the GLA and London Councils' 'The control of dust and emissions from the demolition and construction and demolition'; be at least air quality neutral and not lead to further deterioration of existing poor air quality. Development proposals should seek to reduce the impact of noise.

Policy 7.15

Development proposals should seek to reduce noise by:

- a) minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals
- b) separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation
- c) Promoting new technologies and improved practices to reduce noise at source.

Policy 7.21

Existing trees of value should be retained. Where appropriate, planting of additional trees should be included in new development.

Policy 8.2

When considering planning obligations, the Mayor will have regard to economic viability. Both strategic and local priorities should be addressed. Affordable housing, Crossrail and other public transport improvements should be given highest importance. Tackling climate change, learning skills, health facilities and services, childcare provisions and the provision of small shops may also be required.

Local

London Borough of Camden Core Strategy and Development Management Policies DPD.

Policy CS1

Seeks to promote a concentration of development in the King's Cross Growth Area and in other highly accessible locations.

Policy CS3

The Council will promote appropriate development in the highly accessible areas of Central London outside the growth area of King's Cross. These areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel.

Policy CS8

Recognises and encourages the concentration of creative and cultural businesses in the borough as well as supporting the development of Camden's tourism sector. Policy also recognises the importance of other employment generating uses, including tourism.

Policy CS9

Recognises that in order to achieve a successful central London economy, the Council supports future growth in hotels as well as seeking to improve the quality of the area's streets and places, the connections between them and the ease of movement into, and through, the area.

Policy CS11

The Council will promote the delivery of transport infrastructure and the availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel, and relieve pressure on the borough's transport network. In particular, the Council will promote improvements to encourage walking and cycling as part of transport infrastructure works.

Policy CS13

Requires that all development should take measures to minimise the effects of, and adapt to, climate change and they will encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation.

Policy CS14

Requires that Camden's places and buildings are attractive, safe and easy to use by requiring development to be of the highest quality design; to preserve and enhance heritage assets; promotes high quality landscapes and secures quality access.

Policy CS19

The Council will work with Camden's Local Strategic Partnership and its other partners to deliver the vision, objectives and policies of the Core Strategy and will use planning obligations, and other suitable mechanisms, where appropriate.

Policy DP1

The Council will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. In Camden Town, where more than 200 sqm (gross) additional floorspace is provided, up to 50% of all additional floorspace will be required to be housing in the first instance.

Policy DP13

The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.

Policy DP14

Allows the Council to support tourism development and visitor accommodation by expecting new, large-scale tourism development and accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn.

Policy DP16

The Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links and will resist in appropriate development

Policy DP17

The Council will promote walking, cycling and public transport use. Development should make suitable provision for pedestrians, cyclists and public transport and, where appropriate, will also be required to provide for interchanging between different modes of transport.

Policy DP18

The Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area and development should comply with the Council's parking standards.

Policy DP20

Seeks to minimise the impact of deliveries and servicing of development on the highway network and capacity.

Policy DP22

The Council will promote and measure sustainable design and construction by expecting non-domestic developments of 500sqm of floorspace or above to achieve "very good" in BREEAM assessments.

Policy DP23

Requires developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding.

Policy DP24

Requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design.

Policy DP25

Seeks to maintain the character of conservation areas and preserve or enhance the borough's Listed Buildings, as well as other heritage assets.

Policy DP26

The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.

Policy DP28

Seeks to ensure that noise and vibration is controlled and managed.

Policy DP29

The Council will seek to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities.

Policy DP32

The Council will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality. The Council will also only grant planning permission for development in the Clear Zone region that significantly increases travel demand where it considers that appropriate measures to minimise the transport impact of development are incorporated.

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Appendix 2

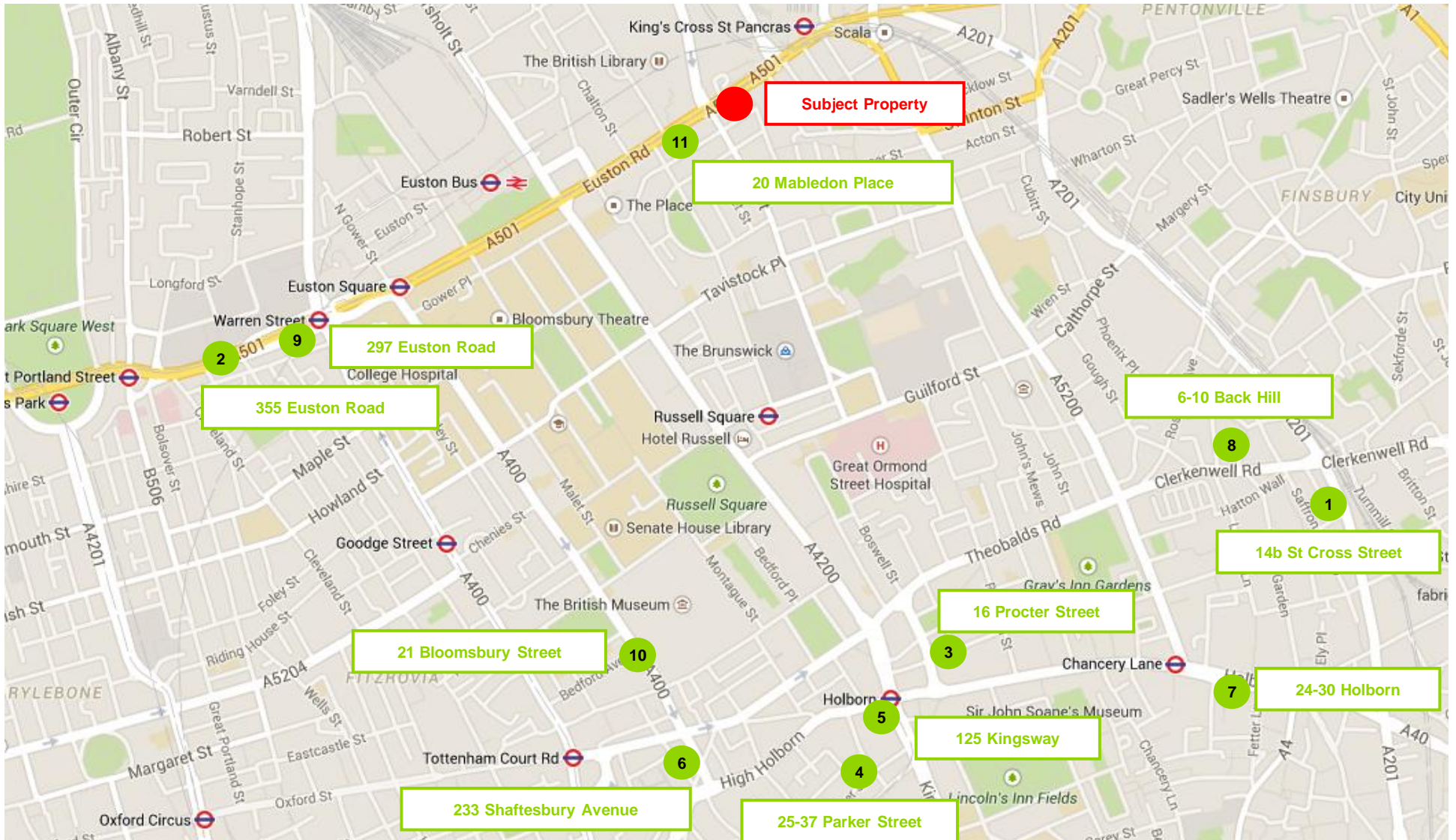
GM Real Estate
Site Search
Report

CAMDEN TOWN HALL ANNEXE
MIXED USE POLICY – SITE SEARCH SUMMARY
DECEMBER 2014








Date	Action	Comments
12/09/2014	Search of Costar Propex online investment sales register.	No suitable options identified within the prescribed search area.
18/09/2014	Search of the Estates Gazette Interactive online database of investment sales.	No suitable options identified within the prescribed search area. See notes within the schedule included as Appendix A.
22/09/2014	Details of the requirement emailed directly to the property agents believed to be most active within the prescribed search area: <ul style="list-style-type: none"> - Anton Page - Burlington Partners - Farebrother - Hatton Real Estate - Pilcher Hershman - Richard Susskind & Co - Robert Irving & Burns - Springer Nicholas - Stirling Ackroyd - TSP UK 	A schedule of the property options identified is included as Appendix C.
23/09/2014 & 24/09/2014	Details of the requirement circulated to 390 property agents' offices/departments throughout Central London via the Estate Agents Clearing House (EACH).	A copy of the requirement circulated is included as Appendix B. A schedule of the property options identified is included as Appendix C, with December 2014 updates shown in red font.

28/11/2014	Updated search of Costar Propex online investment sales register.	No suitable options identified within the prescribed search area.
03/12/2014	Updated search of the Estates Gazette Interactive online database of investment sales.	No suitable options identified within the prescribed search area. Results included within Appendix A.
Ongoing	Continued search for suitable on market opportunities within the prescribed search area through market contacts.	No suitable options identified within the prescribed search area. See notes within the schedule included as Appendix D.

APPENDIX A – EGi ONLINE DATABASE SEARCH
SEPTEMBER & DECEMBER 2014








Camden Town Hall Annex

	Picture	Address	Total Available Space (sq ft)	Use Type	Tenure	Asking Price	Selling Agent	Comments
		Camden Town Hall Annexe, Judd Street	109,803	Sui Generis	Freehold	n/a	Deloitte	- Subject property
1		Saffron Court, 14b St. Cross Street	12,892	Business (B1a) - Office	Freehold	£3.18m	Lambert Smith Hampton	- Entire building - Includes car park comprising 353 spaces, with 11,750 sq ft of office space on a 0.37 acre site - Let to NCP for further 50 years, therefore no opportunity for immediate possession
2		Fitzroy House, 355 Euston Road	41,715	Business (B1a) - Office	Freehold	£45.00m	CBRE / Michael Elliott	- Entire building - Office accommodation of c.40,000 sq ft - Fully let until 2018, therefore no opportunity for immediate possession - Total floor area significantly in excess of that required to satisfy mixed use policy
3		Eagle House, 16 Procter Street	30,533	Business (B1a) - Office, Retail & Leisure	Freehold	£19.80m	Tudor Toone	- Entire building - Last major refurb in 2003 - VP of office accommodation in Nov 2015, likely office refurb and re-letting - Total floor area significantly in excess of that required to satisfy mixed use policy
4		Parker House, 25-37 Parker Street	35,000	Residential Institutional (C2) - Institutional Residential	Virtual Freehold	£28.00m	CBRE	- Entire building - Planning consent for private residential use already in place
5		Aviation House (St Martin's Court), 125 Kingsway, London	126,271	Business (B1a) - Office	Freehold	£155.00m	JLL	- Entire building - Average WAULT of 7.8 years until lease expiry (5 years to lease break) - Total floor area in excess of that required to satisfy mixed use policy - Not for immediate possession as let to secretary of state until 2018 - Total floor area significantly in excess of that required to satisfy mixed use policy
6		Hend House, 233 Shaftesbury Avenue	13,928	Business (B1a) - Office	Freehold	£20.50m	CBRE	- Entire building - Building recently refurbished as an office and leased until 2024 - No opportunity for immediate vacant possession

Note: Price per square foot calculated using the asking price and total available space

Camden Town Hall Annexe

	Picture	Address	Total Available Space (sq ft)	Use Type	Tenure	Asking Price	Selling Agent	Comments
7		Buchanan House, 24-30 Holborn	47,568	Business (B1a) - Office	Freehold	£40.00m	BNP Paribas	<ul style="list-style-type: none"> - Entire building - Asking Price reflected a 4.68% Net Initial Yield - Long term office lease in place, no opportunity for immediate vacant possession - Total floor area significantly in excess of that required to satisfy mixed use policy - Sold Q3 2014
8		Herbal House, 6-10 Back Hill	114,111	General - Site Area	Freehold	£23.00m	n/a	<ul style="list-style-type: none"> - Sold Q2 2012
9		297 Euston Road	9,106	Business (B1a) - Office	Freehold	£8.25m	Deloitte	<ul style="list-style-type: none"> - Entire building - Planning consent for change of use to residential has already been granted - Under offer
10		21 Bloomsbury Street	74,367	Business (B1a) - Office	Freehold	£75.00m	DTZ	<ul style="list-style-type: none"> - Asking price implies a 4.70% yield - Long term office lease in place until 2022 - Total floor area significantly in excess of that required to satisfy mixed use policy - Under offer
11		Bidborough House, 20 Mabledon Place	50,645	Business (B1a) - Office	Freehold	n/a	Lambert Smith Hampton	<ul style="list-style-type: none"> - Entire building - Vacant possession - Potential to extend or develop for a range of uses - Total floor area significantly in excess of that required to satisfy mixed use policy - Contracts exchanged for unconditional purchase Q1 2014

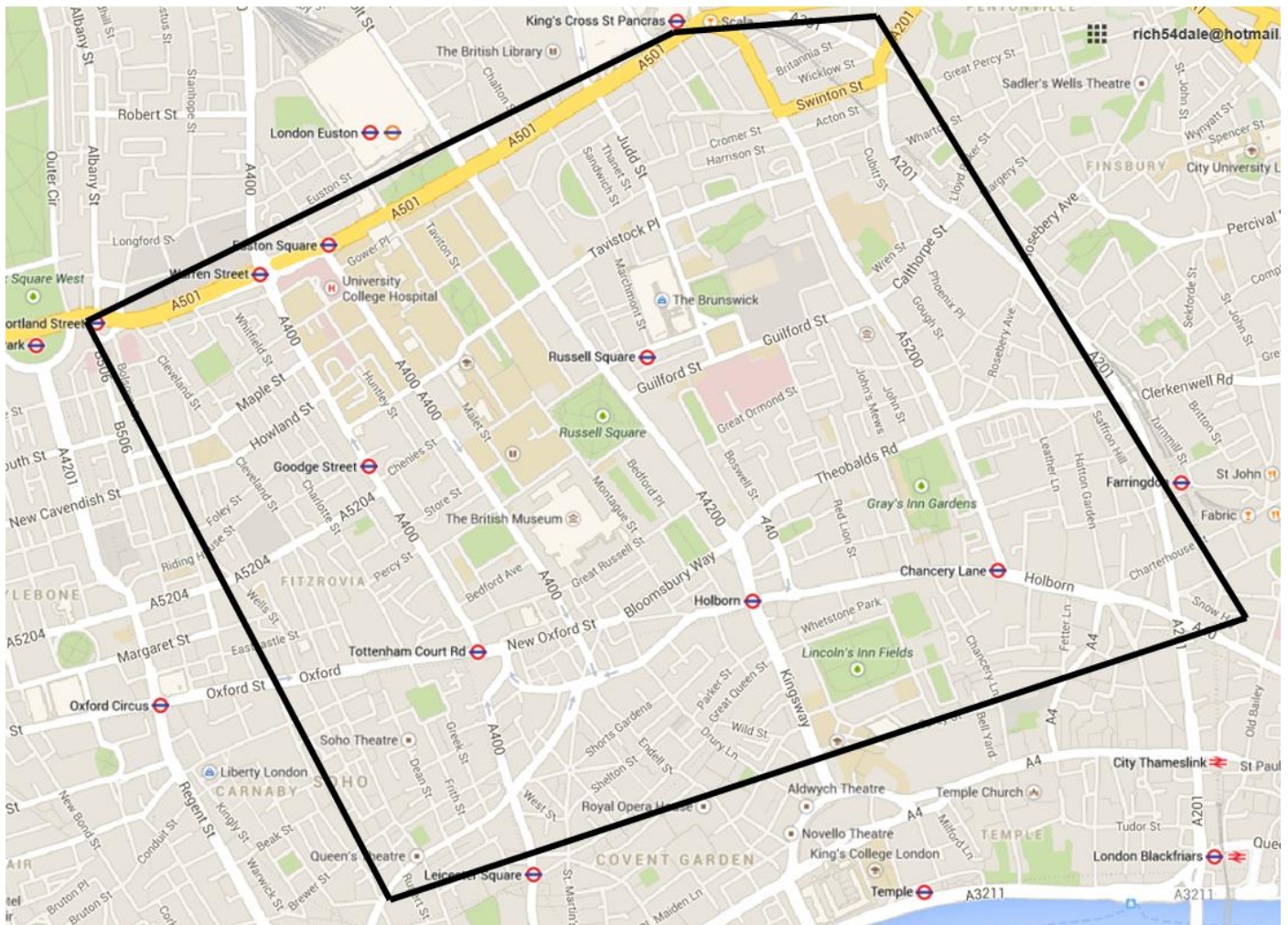
Note: Price per square foot calculated using the asking price and total available space

**APPENDIX B – COPY OF REQUIREMENT CIRCULATED VIA THE
ESTATE AGENTS CLEARING HOUSE (EACH)**

INVESTOR REQUIREMENT

We are retained by an investor seeking to purchase assets matching the following criteria:

- Refurbishment / redevelopment / development opportunities
- Either currently vacant or capable of providing vacant possession in the short term
- Capable of providing 10,000 – 25,000 sq ft net internal area (but WILL consider options outside of this bracket)
- Will consider all current commercial uses e.g. office, warehouse, hotel etc
- Search area broadly as outlined below:



Please provide details of all suitable options to:


Richard Dale
GM REAL ESTATE
6, 7, 8 Tokenhouse Yard, London EC2R 7AS
Direct Tel +44 (0)20 7710 7955
Mobile +44 (0)7795 456 026
richardd@gmreal.com


APPENDIX C – SCHEDULE OF IDENTIFIED PROPERTY OPTIONS
(DECEMBER UPDATES IN RED FONT)

PROPERTY DETAILS RECEIVED THAT WERE OUTSIDE OF THE PRESCRIBED SEARCH AREA

- 80 Clerkenwell Road, EC1
- Arena House, 66-68 Pentonville Road, N1
- 293-295 Old Street, EC1
- 12-27 Swan Yard, N1
- 40-41 Great Marlborough Street, W1


PROPERTY DETAILS RECEIVED WITHIN THE PRESCRIBED SEARCH AREA


	Address	297 Euston Road, N1	Tenant(s)	Owner occupied	Price	£8.25m	Comments AVAILABLE AND ON MARKET BUT WITH PLANNING CONSENT ALREADY IN PLACE FOR CONVERSION TO MAJORITY RESIDENTIAL USE UNDER OFFER
					NIY	-	
					Per sq ft (adjusted where leasehold)	£655 (existing) £625 (consented)	
	Size (sq ft)	12,594 (existing NIA) 13,208 (consented NIA)	Term certain	March 2015	Date		
	Tenure	Freehold			Vendor	Allgood	
					Agent	Deloitte	

	Address	123-129 Grays Inn Road, WC1	Tenant(s)	Eastman Dental Institute	Price	£9.00m	Comments OCCUPATIONAL LEASE EXPIRES SEPTEMBER 2033 SUBJECT TO <u>TENANT ONLY</u> OPTIONS TO DETERMINE FIRSTLY BETWEEN DECEMBER 2016 AND DECEMBER 2017, AND AGAIN AT SEPTEMBER 2023, WITH NO CERTAINTY THAT AN INCOMING OWNER COULD SECURE VACANT POSSESSION PRIOR TO THE LEASE EXPIRY DATE UNDER OFFER
					NIY	2.95%	
					Per sq ft (adjusted where leasehold)	£490 (existing) £485 (proposed)	
	Size (sq ft)	18,351 (existing GIA) 18,654 (proposed GIA)	Term certain	December 2016	Date		
	Tenure	Freehold			Vendor	Private Irish Investor	
					Agent	Allsop	

 	Address	156-164 Grays Inn Road, WC1 & Panther House, 38 Mount Pleasant, WC1	Tenant(s)	Multi-let	Price	£28.00m	Comments ON MARKET AND AVAILABLE BUT THE TOTAL FLOOR AREA IS SIGNIFICANTLY IN EXCESS OF THAT REQUIRED TO SATISFY THE MIXED USE POLICY UNDER OFFER
					NIY	3.15%	
					Per sq ft (adjusted where leasehold)	£660	
	Size (sq ft)	14,105 (Gray's Inn Road) <u>28,208</u> (Panther House) 42,313 (total)	Term certain	3-18 months	Date		
	Tenure	Freehold			Vendor	Private Investor	
					Agent	CBRE	

**APPENDIX D – ADDITIONAL ON MARKET PROPERTIES RECEIVED WITHIN THE
PRESCRIBED SEARCH AREA**

	Address	Fox Court, 14 Gray's Inn Road, WC1	Tenant(s)	Multi-let – Map of Medicine, Trillium and part vacant (70%)	Price	£65.00m	Comments ON MARKET AND AVAILABLE BUT THE TOTAL FLOOR AREA IS SIGNIFICANTLY IN EXCESS OF THAT REQUIRED TO SATISFY THE MIXED USE POLICY CONSENTED OFFICE EXTENSION LEASES ON UPPER FLOORS PREVENT AN INVESTOR FROM OBTAINING FULL VP
					NIY	1.90%	
					Per sq ft (adjusted where leasehold)	£675	
	Size (sq ft)	101,661 (As Is) 126,924 (Consented)	Term certain	October 2018 – June 2022	Date		
	Tenure	Freehold	Rent (total)	£1,301,524	Vendor	Rockspring	
			Rent (per sq ft)	£44.55	Agent	Knight Frank	

	Address	Weston House, 242-246 High Holborn, WC1	Tenant(s)	Multi-let – 10 tenants	Price	£55.00m	Comments THE TOTAL FLOOR AREA IS SIGNIFICANTLY IN EXCESS OF THAT REQUIRED TO SATISFY THE MIXED USE POLICY NOW UNDER OFFER AT 'COMFORTABLY' AHEAD OF ASKING PRICE
					NIY	2.95%	
					Per sq ft (adjusted where leasehold)	£670	
	Size (sq ft)	86,870	Term certain	Offices – April 2015 Retail – March 2015 – March 2061	Date		
	Tenure	Freehold	Rent (total)	£1,703,161	Vendor	Allianz	
			Rent (per sq ft)	£19.60	Agent	JLL	