



Report

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Planning Statement Camden Town Hall Annexe S.73 Minor-Material Amendment

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1. Introduction

1.1 In April 2015 the London Borough of Camden (LBC) Development Control Committee resolved to approve planning permission for the change of use of the Camden Town Hall Annexe (CTHA), Argyle Street, WC1H 8NN from Council offices to a 270 bedroom hotel with a contemporary roof top extension. Permission was then formally granted on 25th August 2015 and works are due to commence on site in early 2016. Furthermore, a Non-Material Amendment (NMA) application was approved on 21st January 2016 for alterations to the ground floor arrangement, roof top extension and the projecting lift. This Section 73 application seeks a Minor-Material Amendment to the approved planning permission to allow for a lift overrun.

1.2 Planning permission (LPA ref: 2014/7874/P) was granted on the 25th August 2015 for:

'Change of use from Council offices (Sui-generis) to hotel (class C1) and alterations to the building including removal of roof top plant, an extension at roof level and alterations to façade'.

1.3 Permission was also granted under an NMA application (LPA ref: 2015/5321/P) on 21st January 2016 for various amendments to the building including:

- Deeper fins;
- Shallower overhang;
- Colour of metal finish;
- Roof light omitted;
- Elevational alterations to 8th floor;
- Projection of external lift structure onto Euston Road;
- Installation of steps onto Euston Road;
- Ground floor elevational alterations.

1.4 After the Council resolved to approve the application in April 2015 further technical design development was carried out. As a result of this further development it became apparent that a number of alterations to the consent would be required. The National Planning Policy Framework (NPPF) recognises the importance of early engagement between developers and Local Authorities as providing significant potential to improve the efficiency and effectiveness of the planning application system for all parties. As such, in July 2015 the applicant approached the LPA to discuss the proposed amendments and the reason for

them. As a result of these discussions a number of these amendments have been approved under the S.96a NMA application.

- 1.5 This application proposes a Minor-Material Amendment to the original approved Town Hall re-development, namely to amend condition 2 of permission 2015/7874/P to allow for a lift over run on the roof (11th floor). To date no other S.73 Minor-Material Amendment applications have been made.

2. Site Description

- 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 additional 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:
- 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.

3. The Proposed Development

Description of Development

3.1 The application seeks amendments to Condition 2 (Plan Numbers) of planning permission 2014/7874/P granted on 25th August 2015 (as amended by 2015/5321/P) to allow for a lift overrun on the roof (11th floor). The amendments to Condition 2 would result in the following amendment:

- The development hereby permitted shall be carried out in accordance with the following approved plans:
 - 1996_X_GA(B2)02_PL Rev P01 – Proposed Sub Basement Plan
 - 1996_X_GA(B1)02_PL Rev P01 – Proposed Basement Plan
 - 1996_X_GA(00)02_PL Rev P01 – Proposed Ground Floor Plan
 - 1996_X_GA(01)02_PL Rev P01 – Proposed First Floor Plan
 - 1996_X_GA(TY)02_PL Rev P01 – Proposed Typical Floor Plan Levels 2 - 6
 - 1996_X_GA(07)02_PL Rev P01 – Proposed Seventh Floor Plan
 - 1996_X_GA(08)02_PL Rev P01 – Proposed Eighth Floor Plan
 - 1996_X_GA(09)02_PL Rev P01 – Proposed Ninth Floor Plan
 - 1996_X_GA(10)02_PL Rev P01 – Proposed Tenth Floor Plan
 - 1996_X_GA(11)02_PL Rev P01 – Proposed Eleventh Floor Plan
 - 1996_X_GS(AA)02_PL Rev P01 – Proposed Section AA
 - 1996_X_GS(DD)02_PL Rev P01 – Proposed Section DD
 - 1996_X_GE(EA)02_PL Rev P01 – Proposed East Elevation
 - 1996_X_GE(NO)02_PL Rev P01 – Proposed North Elevation
 - 1996_X_GE(SO)02_PL Rev P01 – Proposed South Elevation
 - 1996_X_GE(WE)02_PL Rev P01 – Proposed West Elevation

3.2 The proposed alterations have come about because of further detail design work post planning approval.

3.3 During design development it became apparent that the platform lift from 10th floor to roof level approved in the original application was creating aesthetic and accessibility challenges. The platform lift cladding would have needed to be located outside the main plant enclosure, which would have been difficult to contain successfully architecturally.

3.4 The platform lift also resulted in a confused and incoherent access strategy from the 10th floor to the roof top. In order to create the most user friendly and mobility friendly environment it is considered desirable to use one lift throughout the building, rather than having to transfer from the main lift to the platform lift on the 10th floor. Furthermore, this lift would also act as a goods and maintenance lift for the roof terrace.

- 3.5 The lift is located in the centre of the building and the height of the overrun enclosing has been minimised as much as possible by reducing the speed (and thereby the overrun size) and minimising the roof build up. In addition the intention is to clad the structure in a slightly mat silver aluminium cladding which will visually reduce its impact by blending with the sky conditions.
- 3.6 In support of this application further townscape analysis has been undertaken in the form of updated CGI's and an assessment by Robert Tavenor Consultancy. This information illustrates that the lift overrun is not visible from the majority of verified views. The one view that it would occur is from the bottom of Pentonville Road.

4. Planning Policy Framework

4.1 The proposed development must take account of relevant national, regional and local planning policy and guidance. This section of the Planning Statement sets out the relevant national, regional, and local policies, and demonstrates the support of the adopted and emerging policy framework for the proposals.

Adopted Planning Policy and Guidance

4.2 The National Planning Policy Framework (NPPF), published on 27 March 2012, sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in the determination of planning applications. It sets out a presumption in favour of sustainable development (Para 14). This means that development which is sustainable should 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).

4.3 The National Planning Practice Guidance (NPPG) was published 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 and issuing more robust guidance with regards to flood risk. 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.

4.4 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 (FALP) (2015) 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.

4.5 Other material documents for the assessment of this application include:

- LBC Site Allocations DPD
- Camden Planning Guidance (CPG) Documents, including:
 - CPG 1 – Design

Site Specific Allocations / Designations

- 4.6 The application site is Site No. 2 (Camden Town Hall Extension, Euston Road/Argyle Street) of the LBC Site Allocations DPD.
- 4.7 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.
 - Facilitate the planned 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.
- 4.8 The DPD goes on to highlight the excellent public transport accessibility level of the site and the sites 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.
- 4.9 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.

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- 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.

4.10 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.

4.11 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. Planning Assessment

- 5.1 This section provides an assessment of the proposed amendments against the national, regional and local planning policy framework as set out in Section 4.
- 5.2 The National Planning Practice Guidance states that, “there is no statutory definition of a ‘minor material amendment’ but it is likely to include any amendment where its scale and/or nature results in a development which is not substantially different from the one which has been approved”.
- 5.3 Subject to conditions and a S106 legal agreement, the original application was assessed and deemed to be acceptable against the following criteria:
- 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
- 5.4 This S.73 Minor-Material Amendment application solely concerns a lift overrun located centrally within the roof. Therefore, whilst recognising the wider benefits of the scheme, this planning statement will only assess the application in respect to criteria relevant to this amendment, namely Urban Design and Heritage considerations.
- 5.5 As part of the original application a number of technical reports accompanied the submission in support of the scheme. The relevant reports to this application were a Historic

Buildings Report by Donald Insall Associates, and a Townscape and Visual Impact Assessment by Professor Robert Tavenor Consultancy.

- 5.6 The aforementioned reports were prepared in respect the extension dimensions detailed in the original application submitted to the Council on 19th December 2014. A maximum extension height of 12.28m at the north / south and west façades and 14.88m at the east façade were proposed. Following discussions with the Council, the facades were reduced by 1m and 1.5 m respectively (Camden Town Annex Design Update, March 2015). These heights would not alter as part of this application, merely a 0.31m (measured from highest point previously approved) lift overrun, centrally located within the roof space, would be constructed.

Urban Design

- 5.7 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 approved application results in the demolition of the staircase which attaches the original town hall to the annexe building. This was considered to be a positive attribute of the original design proposals as it restores the Town Hall to its original condition and allows for views of St Pancras from the south through Tonbridge Walk.
- 5.8 A major benefit of the approved permission was also to allow a development which can enliven the ground floor and bring activity to Euston Road, Argyle Street and Tonbridge Walk, as well as providing an east-west route through the site previously closed off by the Council.

Policy Summary

- 5.9 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).
- 5.10 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;
 - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

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- 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.
- 5.11 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).
- 5.12 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.
- 5.13 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.
- 5.14 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;

- 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;

5.15 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.

5.16 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

5.17 The original application was 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.

5.18 The design of the roof top extension was amended during the consideration of the original application to decrease its height. The application was supported by a Historic Buildings Report and Townscape and Visual Impact Assessment by Donald Insall Associates and Professor Robert Tavenor Consultancy. These reports assessed the proposals at the height at submission stage, rather than the amended reduced height which was subsequently approved by the Council.

5.19 The evolution of the design process resulted in a scheme that:

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- Replaces the glazing at ground floor to create a better connection between the building and the public realm
 - Places the entrance and lobby at ground floor to create a more active street frontage
 - Improves the connection of the building with Euston Road
 - Opens up the existing garden and creates an east-west shared pedestrian and cycle route
 - Narrows the existing ramp and repair the crossover pavement to reduce the visual impact of the ramp and to make the pavement pedestrian priority
 - Removes the west core staircase and thereby open up a route and views down Tonbridge Street
 - Replaces the existing tinted windows with clear glass
 - Removes the existing concrete plant room from 8th floor
 - Extends the building by two floors from the existing top of roof plant with new hotel accommodation
 - Provides 270 hotel rooms and associated hotel ancillary space

5.20 The above proposals have been assessed and deemed to be acceptable / beneficial in design terms. Since this S.73 Minor-Material Amendment application solely concerns a lift overrun of 3.1m in height, this planning statement focuses solely on this feature of design, whilst acknowledging the wider design benefits of the scheme.

5.21 The proposed lift overrun does not result in any changes to the main form of the roof top extension, which was considered to be of good design by the Council, and remains sensitive and respectful in scale and form to St Pancras Station. St Pancras would remain the dominant focal point in key views towards the Station. It is acknowledged that the proposed extension is intentionally unashamedly contemporary in design so as not to compete with nearby important heritage assets, and this was considered to be an appropriate and acceptable response in design terms by the Council, Design South East and English Heritage. This can be seen from the following extracts of the Council's Committee Report and Minutes from the Development Control Committee:

Committee Report

- Para 7.62 - *"The proposed roof extension is considered to be a good resolution to the top of a building which is currently utilitarian in its termination. It is considered to have a scale that is in proportion to the host both in its overall scale and the modulation of its forms, and is composed of high quality materials and detail. As*

such it is considered to be an architectural enhancement over the existing. It is considered appropriate in scale to its location on the Euston Road and across from the large new Station Square. The proposal does not obscure views of St Pancras Chambers, but instead it does introduce a new view opportunity through the removal of the western stair tower”.

- Para 7.63 - *“English Heritage support the proposal, stating that it “adds interest to a roof that is now let down by its unresolved form. The increase in height to the building means that views towards the site from within the conservation areas nearby will change, but we do not believe that equates to harm. In addition, whilst the new roof form changes the settings of some nearby listed buildings in certain views, we do not believe that harm is caused”. The SE Design Panel gives support stating that “this is a well-considered and fundamentally sound proposal”.*

Committee Minutes

- “Some Members of the Committee expressed their views on the proposal and remarked that it was a striking statement which did not detract from St Pancras”.
- “Further discussion took place in relation to the height of the proposal, in response to concerns from the Committee, the Planning Officer remarked that it was not considered to be a tall building, the wording in the Camden guidance referred to substantially taller or buildings that would significantly change the London skyline. Officers considered that the proposal was within context of its surrounding buildings and that it would not significantly change the skyline. Townscape and visual analysis had been undertaken and views from areas such as Primrose Hill had been taken in consideration”.

5.22 This lift overrun proposed in this S.73 application will have no material impact on the visual benefits of the extension in terms of townscape and therefore accords with the NPPF and LBC Policies CS14 & DP24.

Heritage and Archaeology

5.23 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”.

5.24 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.

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- 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.

5.25 Full details and assessment of these heritage assets are set out in the Historic Buildings Report by Donald Insall Associates and the Townscape and Visual Impact Assessment by Professor Robert Tavenor Consultancy that accompanied the original application. Further detailed considerations relating to the lift overrun are set out in the updated Professor Robert Tavenor report. All of these reports remain relevant to this S.73 application.

Policy Summary

5.26 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.

5.27 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.

5.28 Policy 7.8 (Heritage Assets and Archaeology) 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.

5.29 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;
- 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.

5.30 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.

5.31 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.

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- 5.32 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.
- 5.33 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.
- 5.34 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

- 5.35 The Donald Insall Historic Building (DIHB) 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 extension 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.

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- 5.36 The DIHB Report assessed the design of the building at its original submission height, which is higher than that eventually approved. The conclusions of the report therefore remain relevant and the extension, including the proposed lift overrun, would help improve the visual impact of the building itself and the negative contribution the building currently makes to the townscape and surrounding conservation areas.
- 5.37 With regards to the townscape analysis, the updated report by Professor Robert Tavenor concludes that as a result of continuing design development following consent, some design refinements to the Consented Development are proposed including an increase in height to a lift overrun. This slight change to the massing has been tested in the fifteen views considered in the December 2015 TVIA. In one view, View 14 from Pentonville Road, the top of the lift overrun, would be visible; a verified view to demonstrate the likely change to the view in comparison to the consented Development has been remodelled. In all the remaining views the increase in height would not be discernible.
- 5.38 In terms of their assessment, Professor Robert Tavenor Consultancy concludes that, "the lift overrun would be just visible above the crown of the Consented Development, making a slight change to the skyline of the Consented Development. The lift is embedded within the plan and set well back from the building's east façade; it would therefore not interrupt the simple form and clean roofline of the crown and would read as a clearly secondary element of the roofscape. The materiality of the cladding to the lift overrun would be recessive. As a result of its scale, materiality and set back the lift overrun would be barely noticeable to a casual observer, with a negligible additional impact on the composition and quality of the view as a whole. The slight change to the roofscape of the Consented Development would not discernibly alter the visual relationship of the consented Development to the Grade I listed former Midland Grand Hotel in this view. The conclusions of the December 2014 TVIA would remain valid".

6. Conclusion

- 6.1 There is no statutory definition of a 'minor material amendment' but it is likely to include any amendment where its scale and/or nature results in a development which is not substantially different from the one which has been approved".
- 6.2 The proposed amendments result in a small lift overrun will not materially impact upon the permitted schemes beneficial impact in terms of urban design, townscape and impact on the surrounding conservation area. Rather, the proposed overrun would result in a more coherent access strategy throughout the building. In conclusion, the amendments do not result in a development that is substantially different to the approved application in scale and/or nature.
- 6.3 The Council deemed that the original proposals for the scheme were entirely appropriate and accorded with national policy and guidance, the London Plan, the Core Strategy and the Development Management Local Plan. This proposed minor material amendment does not alter this conclusion and the development maintains its compliance with the Council's development plan and continues to provide an appropriate solution to the re-use and revitalisation of this prominent building.