



**GMS Estates Ltd**

**KINGSWAY HOUSE, 103 KINGSWAY  
CAMDEN WC2B 6QX**

**APPLICATION FOR PLANNING  
PERMISSION**

**JUNE 2016**

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## 1.0 EXECUTIVE SUMMARY

1.1 This report has been prepared by Montagu Evans, to accompany a planning application for a reconfigured ground floor frontage, extended retail and office floorspace, increased floor to ceiling heights, and roof top extension to Kingsway House, Kingsway, WC2B 6QX (hereafter referred to as “the Site” or “this Site”).

1.2 The application for planning permission seeks approval for:

*“Internal reconfiguration to provide additional A1/A3 Retail and B1(a) floorspace on basement and ground floors. Remodelling and extension of upper storeys to accommodate further additional B1(a) Office floorspace”*

1.3 The Site is located within the administrative area of London Borough of Camden (LBC). The Site is occupied by Kingsway House, a 7 storey building with an additional storey of plant (basement, ground plus 7 storeys and plant) as detailed in **Section 3**.

1.4 A review of LB Camden’s planning files was undertaken and the relevant planning history for the site is set out in EMRYS Architects’ Design and Access Statement that forms part of this planning application.

1.5 The proposals for the site are summarised in **Section 5**.

1.6 The proposal is designed to complement and assimilate with the existing building’s architectural form and style. Equally, the proposal is an appropriate addition to the area and serves to preserve the setting of nearby Designated Heritage Assets. The Planning Statement has assessed the proposals against the Development Plan as required by S38 (6) of the Planning and Compulsory Purchase Act 2004 (**Section 6**).

1.7 The proposals have been very carefully designed in order that they accord with adopted and emerging development plan policies, other relevant guidance and previous planning decisions. **Section 7** provides an assessment of the Application against the policies and guidance contained within these documents.

1.8 In particular, the proposal has been formulated in accordance with the development plan as demonstrated in **Section 7**, including:

- London Plan March 2015 (FALP);
- Camden Core Strategy (2010);
- Camden Development Policies (2010);
- Camden Site Allocations Plan (2013); and
- Fitzrovia Area Action Plan (March, 2014).

The following relevant planning guidance has also been considered;

- Camden CPG 1 Design (July, 2015);
- Camden CPG 2 Housing (July, 2015); and
- Camden CPG 6 Amenity (July, 2015).

- 1.9 Camden's draft Local Plan is at the Submission draft stage and was reported to Cabinet in early 2016 for approval to consult and submit for public examination held by a Planning Inspector. The examination is expected to take place in the summer of 2016.
- 1.10 Whilst at a fairly advanced stage, senior Officers have advised recent Development Control Committee Members that the emerging policies should not be applied in the determination of planning applications. This report therefore adopts that approach.
- 1.11 **Section 8** concludes that the proposal is in accordance with the relevant national planning policy guidance, regional and local development plan policies.

## 2.0 INTRODUCTION

2.1 This report has been prepared by Montagu Evans, to accompany a planning application for a reconfigured ground floor frontage, extended retail and office floorspace and alterations to upper floors including a roof top extension to Kingsway House, Kingsway, WC2B 6QX (hereafter referred to as “the Site” or “this Site”).

2.2 The application for planning permission seeks approval for:

*“Internal reconfiguration to provide additional A1/A3 Retail and B1(a) floorspace on basement and ground floors. Remodelling and extension of upper storeys to accommodate further additional B1(a) Office floorspace”*

### **Applicant**

2.3 The application is submitted on behalf of the Applicant, GMS Estates Ltd who are freeholders of the site.

### **Summary of Proposals**

2.4 Full details of the proposals are set out in the Design & Access Statement and accompanying drawings.

2.5 This proposed development will involve the following changes to the existing building:

- Reconfiguration and refurbishment of ground floor office and retail frontages;
- Internal reconfiguration, providing additional A1/A3 Retail floorspace on basement and ground floor and additional B1 floorspace on upper floors;
- A roof extension providing further additional B1(a) floorspace;
- The proposals will result in an additional 73m<sup>2</sup> GEA of A1/A3 Retail floorspace and 135m<sup>2</sup> GEA of additional B1 floorspace.

### **Purpose of the Planning Statement**

2.6 The purpose of this Statement is to provide an analysis of the proposed scheme in light of planning policy and guidance. The Statement sets out how the considerations material to the determination of the application have been taken into account.

2.7 The Planning Statement forms part of the supporting information which has been submitted for this application, and is to be read in conjunction with the following documents:

- Application Covering Letter;
- Planning Application Form;

- Location Plan - EMRYS;
- Proposed and existing plans, sections and elevations – EMRYS;
- Design & Access Statement – EMRYS;
- Sunlight and Daylight Report – GL Hearn;
- Plant Noise Assessment Report – Auricl Acoustic Consulting;
- Structural Design Philosophy (Appendix B of D&A) – Elliot Wood;
- Transport Statement – Caneparo Associates;
- Travel Plan – Caneparo Associates;
- Construction Management Plan – Caneparo Associates;
- Energy Statement – Millieu Consult;
- BREEAM Report Stage 1 – Verte Sustainability;
- Sustainable Urban Drainage System Report – Elliot Wood;
- Ecology Survey Report – Greengage;
- Community Infrastructure Levy (CIL) Form.

2.8 This Planning Statement demonstrates that the proposed scheme:

- Is in accordance with relevant planning policy at national, regional and local level and delivers sustainable development;
- Will provide remodelled upper storeys of the highest quality design that are well-related to their context and enhance the settings of nearby Designated Heritage Assets, such as the Kingsway Conservation Area and Listed Buildings, such as 60 Parker Street and 5 Great Queen Street;
- Provides improved active frontages and an additional 73m<sup>2</sup> GEA of A1/A3 Retail floorspace;
- Provides (through internal reconfiguration and extensions) 135m<sup>2</sup> GEA of additional B1 floorspace.

### **3.0 SITE & SURROUNDING**

- 3.1 A Site Location Plan is provided as part of this planning application.
- 3.2 The Site is located within the administrative area of London Borough of Camden (LBC) and accommodates Kingsway House which comprises, a basement and a building of ground plus 6 storeys. The basement and ground floors accommodate A1/A3 Retail floorspace and ancillary office floorspace with the upper floors being B1(a) Office use.
- 3.3 Kingsway House (No.103) fronts onto Kingsway, facing west. The building is flanked by Great Queen Street to the immediate south and Parker Street to the immediate north. The surrounding area includes a wide range of uses consisting primarily of offices, retail, hotel and some residential.
- 3.4 The Site lies within the Central London Area, an Archaeological Priority Area and the Kingsway Conservations Area. The building's frontages on Great Queen Street, Kingsway and Parker Street are designated as Central London Frontage.
- 3.5 The building, designed by A Sykes and built in circa 1905, is not listed but it is identified as a building which makes a positive contribution to the character and appearance of the Kingsway Conservation Area. Two listed buildings are located within the immediate vicinity of the Site, 60 Parker Street and 5 Great Queen Street. Both are Grade II Listed and a copy of their listing is enclosed at Appendix 1 of this report.
- 3.6 The Site has a PTAL of 6b, which is the highest PTAL rating achievable.

#### **4.0 PLANNING HISTORY**

- 4.1 The planning files on London Borough of Camden website have been reviewed. Various applications for replacement windows, external alterations and installation of telecommunications masts have been submitted and approved in the past, however none of these are relevant to the proposals now being considered.
- 4.2 Planning permission was granted in 2010 for the change of use of part of the 6<sup>th</sup> floor from B1(a) Office to a D1 dental surgery. There is no information available to suggest this permission was ever implemented. The existing layouts appear to support this position as they do not reflect the scheme's permitted layouts in any way.



## 5.0 PROPOSALS AND DESIGN DEVELOPMENT

5.1 The proposals comprise:

- Reconfiguration and refurbishment of basement and ground floor office and retail floorspace;
- Relocation of office entrance on Kingsway to Great Queen Street, creating additional retail frontage along Kingsway;
- Reconfiguration of two A3 Café and Restaurant use units and creation of new shop fronts and entrances enhancing contribution to vitality and viability of Kingsway;
- Reconfiguration of B1(a) Office floorspace on upper levels with improved floor to ceiling heights and level access throughout;
- Remodelling and extension of storeys 7 and 8 to accommodate further additional B1 Office floorspace;
- Modern plant and services will replace outdated and inefficient systems creating significantly more sustainable and energy efficient accommodation;
- The proposals will result in an additional 73m<sup>2</sup> GEA of A1/A3 Retail floorspace and 135m<sup>2</sup> GEA of additional B1 floorspace. In total, 3849m<sup>2</sup> GEA of refurbished Cat A B1(a) floorspace will be created.

5.2 The proposals are the result of extensive pre-application advice and discussions with Camden Council Planning and Conservation and Design Officers. The proposals were first presented to officers at a meeting at Camden Council on the 15<sup>th</sup> July 2015. The scheme was then the subject of significant amendments and reissued to the same officers for formal written advice. This advice was received on 23<sup>rd</sup> November 2015.

5.3 Further amendments were made following this advice and the third iteration of the scheme was presented to officers at further meeting held on 27<sup>th</sup> April 2016. The proposals reflect the conclusions of that final meeting.

## 6.0 PLANNING POLICY FRAMEWORK

6.1 The application has been designed to accord with adopted and emerging development plan policies, and other relevant guidance from the outset. Extensive officer input was received and incorporated into the scheme (as detailed in Section 5) The following provides a summary of the planning policy and material consideration against which the proposals should be assessed. **Section 7** provides an assessment of the Application against the policies, guidance documents and other material considerations.

### Statutory Framework

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 required planning applications to be determined in accordance with the policies of the statutory development plan unless other material considerations indicate otherwise.

### The Development Plan

6.3 In this case, the statutory Development Plan consists of the:

- The London Plan 2015 (FALP);
- Camden Core Strategy (November, 2010); and,
- Camden Development Policies (November, 2010).

6.4 The relevant policies within the development plan that apply to the proposals are outlined below:

### London Plan

- Policy 1.1 Delivering the strategic vision and objectives for London
- Policy 2.9 Inner London
- Policy 2.10 Central Activities Zone – Strategic Priorities;
- Policy 2.10 Central Activities Zone – Strategic Functions;
- Policy 4.1 Developing London’s Economy;
- Policy 4.2 Offices;
- Policy 4.7 Retail and Town Centre Development;
- Policy 5.1 Climate Change Mitigation;
- Policy 5.3 Sustainable Design and Construction;
- Policy 5.13 Sustainable Drainage;
- Policy 7.3 Design Out Crime;
- Policy 7.4 Local Character;
- Policy 7.6 Architecture; and,
- Policy 7.8 Heritage Assets and Archaeology.

### **Camden Core Strategy**

- Policy CS1 Distribution of growth
- Policy CS2 Growth areas
- Policy CS5 Managing the impact of growth and development
- Policy CS7 Promoting Camden's centres and shops
- Policy CS8 Promoting a successful and inclusive Camden economy
- Policy CS9 Achieving and successful Central London
- CS13 Tackling climate change through promoting higher environmental standards
- CS14 Promoting high quality places and conserving our heritage

### **Camden Development Policies**

- Policy DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses;
- Policy DP13 Employment sites and premises;
- Policy DP17 Walking, Cycling and Public Transport;
- Policy DP18 Parking Standards;
- Policy DP22 Promoting Sustainable Design and Construction;
- Policy DP24 Securing High Quality Design;
- Policy DP25 Conserving Camden's Heritage;
- Policy DP26 Managing the Impact of Development on Occupiers and Neighbours;
- Policy DP28 Noise and Vibration;
- Policy DP30 Shopfronts;
- Policy DP32 Air Quality and Camden's Clear Zone.

### **Emerging Policy**

- 6.5 Camden Council is in the process of reviewing its main planning policies and has consulted on a draft Local Plan. When finalised, the Local Plan will replace our current Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.
- 6.6 The Submission draft Local Plan was reported to Cabinet in early 2016 for approval to consult. This consultation took place in Spring 2016. Submission of the plan for consideration by a Planning Inspector in an Examination In Public, is expected later in the year.
- 6.7 The Council's draft Local Plan has undergone consultation and is currently being updated to reflect the consultation responses received. The emerging Local Plan should not be afforded significant weight in planning decisions therefore.

## **National Policy**

### National Planning Policy Framework (NPPF) – 27 March 2012

- 6.8 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and is to have immediate effect on all planning decisions.
- 6.9 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through both the plan-making and decision-taking process. This means approving development proposals that accord with the development plan without delay, and where the development plan is absent, silent, or out of date, granting permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF.

## **Regional Guidance**

- 6.10 The GLA has also published a number of supporting documents that are relevant in the consideration of this application. Of particular relevance are:
- Central Activities Zone (March, 2016)
  - Character and Context (June, 2014)
  - Accessible London SPG (October, 2014);
  - Sustainable Design and Construction (April, 2014);
  - Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April, 2013); and.
  - Planning for Equality and Diversity in London SPG (October, 2007).
- 6.11 The remainder of this document identifies the key issues relevant to the determination of the Application and considers these in the context of relevant policy and guidance.

## **Local Guidance**

- 6.12 The relevant planning guidance published by Camden which is of particular relevance to the proposals is outlined below:
- CPG 1 Design (July, 2015)
  - CPG 5 Town centres, retail and employment (September, 2013)
- 6.13 Camden Council have produced a Conservation Area Statement for the Kings Way Conservation Area. The document does not perform an analytical role nor does it clearly state what contribution or otherwise Kingsway House makes to the character and appearance of the Conservation Area. It states simply:

*'Kingsway House (Nos.99-107) has shops at ground floor level with marble pilasters and elaborately decorated carved figures under the two storey window bays.'*

- 6.14 It is reasonable to assume that overall the building is a 'positive contributor' to the Conservation Area, albeit that its current roof arrangement, in itself, clearly detracts from the building's architectural merit and therefore also from the character and appearance of the Conservation area.

## 7.0 KEY PLANNING CONSIDERATIONS

### Introduction

- 7.1 Within this section, we assess the proposed development against the statutory development plan and other material considerations as outlined in **Section 6**.

### Designations

- 7.2 The Site is not subject to any site specific designation, though it is located within the Central London Area and the Kingsway Conservation Area.

### Land Use

#### Additional B1(a) Office Space

- 7.3 Throughout the London Plan, and in Policy 4.2 in particular, renewal of existing and creation of additional office stock is encouraged.
- 7.4 At the local level, Camden Core Strategy Policies CS1 – Distribution of Growth and CS2 – Growth Areas, promote the principle of additional office stock in the Borough, the Central London Area, and the designated Growth Areas in particular (of which Holborn is one).
- 7.5 Policy CS1 Distribution of Growth also requires that developments make full use of sites and buildings, taking into account their built context. High density developments should be located in Growth Areas and highly accessible areas. Holborn is both of these.
- 7.6 It is clear therefore that the principle of office development in this location is encouraged at all policy levels.

#### Additional A1/A3 Retail Space

- 7.7 The site's ground floor frontages (on Great Queen Street, Parker Street and Kingsway itself) are designated as Central London Frontage. Being located within the Holborn Growth Area too, means policy is particularly clear in terms of the desire for additional and higher quality retail offering in these units.
- 7.8 In its Core Strategy, Camden lists among its aspirations for the Holborn Growth Area the *'provision of appropriate retail and service uses in the area's Central London Frontage and taking opportunities to introduce ground floor retail uses where the continuity of the frontage is currently broken'*.
- 7.9 The Site's retail frontage along Kingsway is currently broken. Access to the office floorspace on the upper floors is currently provided via a central doorway off Kingsway. This door way leads to a central stair and lift core that occupies approximately one third of each floor of the building.

- 7.10 At ground floor, and using one third of the space available behind the building's principal façade off Kingsway, the core severely compromises the efficiency with which the building uses the site. Moreover, and more importantly perhaps in planning terms, the building's potential to offer high quality retail floorspace as well as active frontages is severely reduced.
- 7.11 The proposals seek to remedy this by reconfiguring the core such that it uses far less space, creating additional ground floor retail space and office space throughout the rest of the building. Further, the office entrance has been moved to Great Queen Street. The retail frontage this displaces is replaced created at the existing office entrance, unifying the Central London Frontage along Kingsway.
- 7.12 We are therefore of the view that the proposals, in increasing the quantum and quality of the retail floorspace in the Holborn Growth Area and within Central London Frontage, adhere to the requirements of Camden Core Strategy Policies CS1 – Distribution of Growth and CS2 – Growth Areas.
- 7.13 In addition to the 'in principle' acceptability of additional retail floorspace in the form proposed, we consider that the increased floorspace will not result in unacceptable impacts on residential amenity. That is to say that Policy DP 12 seeks to prevent 'over concentrations' of A3 Retail uses lest they combine to denude residential amenity unacceptably by virtue of odour, hours of operation, servicing and / or antisocial behaviour. The policy states:
- "The Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours."*
- 7.14 The building has operated retail functions on the ground floor without causing concern to local residents for decades. We note the additional retail floorspace is modest and would therefore not materially increase the impacts generated by these uses. In this way, the requirements of Policy DP12 in particular would be met.

## **Design**

### Townscape

- 7.15 Kingsway House is not listed, but is located within the Kingsway Conservation Area. The Site is also adjacent to two listed buildings, 60 Parker Street and 5 Great Queen Street. Both are Grade II Listed and their listing is at Appendix 1 of this report. Therefore, in so far as the proposals affect the setting of Designated Heritage Assets, relevant policy should be applied in addition to the design standards required of all developments.
- 7.16 Good design is sought at the national level (via the NPPF and NPPG), within the London Plan and in Local Plan policy. Each seeks to ensure a proposal's design is

appropriate, contributes positively to the surrounding townscape, and preserves or enhances Designated Heritage Assets (and / or their settings).

7.17 Given that the proposals' implications for townscape and Designated Heritage Assets are so closely related, the two aspects are both dealt with in the following section.

7.18 Good design is also central in London Plan policy. Policies contained within Chapter 6 set out a series of overarching design principles for development to achieve this by addressing its layout, height, massing and elevations.

7.19 London Plan Policy 7.1 requires that good quality environments are provided which have the best possible access to services, infrastructure and public transport.

7.20 London Plan Policy 7.6 states that *'architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context'*.

7.21 Policy also requires new buildings and structures (in this case the revised frontages and roof extension):

- need to be 'of the highest architectural quality';
- need be 'of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm';
- should include details and materials that 'complement, not necessarily replicate' local architectural character; and
- should not cause 'unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings'.

7.22 London Plan Policy 7.4 states that *"buildings, streets and open spaces should provide a high quality design response that:*

- a) *has regard to the pattern and grain of the existing spaces and street in orientation, scale proportion and mass;*
- b) *contributes to a positive relationship between the urban structure and natural landscape features;*
- c) *is human in scale, ensuring building creates a positive relationship with street level activity and people feel comfortable with their surrounding;*
- d) *allows existing buildings and structures that make a positive contribution to the character of the place to influence the future character of the area; and*
- e) *is informed by the surrounding historic environment. Policies in Chapter 3 set out requirements for optimising potential, quality and design of new housing development"*.

7.23 Policy CS14 of Camden's Core Strategy states, *"...the Council will seek to preserve and enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings"*.



7.24 Policy DP24 – Securing High Quality Design – of the Development Policies Document explains that development, including (as in this case) alterations and extensions to existing buildings, should be of the highest standard of design. Of particular relevance, the policy expects 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;...*

*e) the appropriate location for building services equipment;...”*

7.25 Policy DP25 – Conserving Camden’s Heritage - of the Development Policies document deals with the setting of conservation areas and listed buildings. Sections a, b, and g state:

*“The Council will take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas”;*

*“The Council will only permit development within conservation areas that preserves and enhances the character and appearance of the area”;* and,

*“The Council will not permit development that it considers would cause harm to the setting of a listed building”.*

7.26 As stated in Paragraphs 6.13 and 6.14 the Kingsway Conservation Area Statement refers to Kingsway House simply as having ground floor retail with marble pilasters and decorative figures under two storey bay windows. On this basis, this building is assumed to be a ‘positive contributor’ to the character and appearance of the Conservation Area. Albeit that the current roof arrangement, in itself, clearly detracts from the building’s architectural merit and therefore also from the character and appearance of the Conservation area.

7.27 The above policies have informed the nature of these proposals from the outset. EMRYS’ Design and Access Statement, included as part of this application, provides a full detailed design rationale. This should be read in conjunction with the planning policy analysis in this statement.

7.28 The Kingsway Conservation Area Statement describes the surrounding townscape and character as follows:

*“The sites lining this new thoroughfare were developed as a series of prestigious commercial buildings in a neo-classical style, generally uniform in*

*materials, scale and massing and following a consistent building line. As such, it provides a complete example of large scale Edwardian architecture.”*

- 7.29 The replacement sixth floor and new seventh floor respect this character and the prevailing Edwardian architectural approach. Similar to a variety of other double and triple ‘mansard’ roof arrangements now in evidence along Kingsway, the proposals do not replicate, but compliment, the local character and architecture.
- 7.30 Basic height, bulk and mass, combined with appropriate proportions, visually tie the new roof arrangement into the existing lower floors such that Kingsway House presents as a coherent architectural composition. Its civic proportions chime with those prevalent on Kingsway, where ornate stone frontages give way to attic storeys and tiled mansard roofs.
- 7.31 The use of appropriate materials too, in this case Zinc interlocking diamond tiles, will result in an architectural addition that sits comfortably both in terms of Kingsway House itself and in terms of the wider townscape.
- 7.32 Computer Generated Images of the proposals are provided in EMRYS’ Design and Access Statement. These support the design assessment above in showing that the proposals’ appearance in views where they are most visible looking north and south along Kingsway is appropriate and avoids incongruity.
- 7.33 At ground floor the existing shop fronts are obscured and compromised by years of piecemeal alterations and signage additions. The resulting visual contribution to the character and appearance of the Kingsway Conservation Area must, at best, be considered neutral.
- 7.34 The proposals seek to ‘clean up’ the irregular signage by creating a coordinated signage strategy where brand names are set behind new, stall to ceiling glazed elements set within cleaned frontages. EMRYS explain in their Design and Access Statement that a new granite plinth would also be installed and incorporated into the stall risers.
- 7.35 In close consultation with planning and design and conservation officers, careful consideration has been given to the requirements of Policy DP24 in particular. For the reasons set out in the Design and Access Statement and summarised above, the proposals are considered to comply with all relevant design requirements and Policy DP24 particularly.

#### Designated Heritage Assets

- 7.36 As explained above and set out in the Design and Access Statement, the existing building is not listed, but is located within a Conservation Area. The Site is also adjacent to 60 Parker Street and 5 Great Queen Street. Both are Grade II Listed and their listing is at Appendix 1 of this report.

- 7.37 Detailed Government guidance on Planning and the Historic Environment is provided in Paragraphs 126 – 141 of the NPPF. Under this guidance, the Kingsway Conservation Area is a ‘designated heritage asset’ as are the surrounding listed buildings, noted above.
- 7.38 The policies listed in Section 6 are clear that development proposals must preserve or enhance the character and appearance of these designated heritage assets. This position is supported at a National level, in the NPPF, that encourages LPAs to look for opportunities to permit development which promotes high quality design.
- 7.39 NPPF Paragraph 131 states that in determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets;
  - The positive contribution that conservation of heritage assets can make to sustainable communities; and,
  - The desirability of new development making a positive contribution to local character and distinctiveness.
- 7.40 ‘Conservation’ is defined in the NPPF ‘Annex 2: Glossary’ as ‘The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.’
- 7.41 NPPF Paragraph 132 notes 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.
- 7.42 For the avoidance of doubt, in representing an enhancement to the Conservation Area and to the settings of listed buildings, no ‘harm’ as described in Paragraphs 133 and 134 is caused. Thus these paragraphs are not relevant to the determination of this planning application.
- 7.43 The visibility of the upper levels and roof top of the proposals is necessarily limited to local views from within the Conservation Area and the setting of the Listed Buildings. CGI views are provided in Section 3 of EMRYS’ Design and Access Statement.
- 7.44 To understand whether a proposal ‘preserves or enhances’ the character and appearance of designated heritage assets and their settings, an assessment of the existing condition must be carried out.
- 7.45 The existing roof top elements are a poorly arranged combination of office accommodation, plant, plant enclosures, and railings added piecemeal during the decades following World War II. In this way the upper floors mostly detract from the

architectural quality of Kingsway House, the character and appearance of the Conservation Area and the setting of nearby listed buildings.

- 7.46 There is therefore clearly an opportunity for new development to make a positive contribution to local character and distinctiveness.
- 7.47 The proposals are of the highest architectural quality and as such result in a significant visual enhancement of both the host building and the wider built context, including the Kingsway Conservation Area and the settings of the adjacent Listed Buildings.
- 7.48 The proposals replace visually damaging elements of an otherwise architecturally sound building. The addition draws on key existing design features and serves to 'complete' the building, producing a coherent piece of design, well suited to its civic scale context.
- 7.49 In this way, National Policy and the requirements of the London Plan and Local Plan Policy are met.

#### **Residential Amenity**

- 7.50 Development Policy DP26 requires that the amenity levels of residents in the locality of development proposals is not unduly affected. The following factors should be considered in the determination of a planning application. These 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.*

*Developments will also be required to provide:*

- i) facilities for the storage, recycling and disposal of waste; and,*
- j) facilities for bicycle storage."*

- 7.51 The proposals are surrounded by buildings with various lawful uses. Whilst a minority, some residential properties are among those surrounding buildings and as such an analysis of the proposals' impact on their amenity has been undertaken.
- 7.52 The implications for daylight and sunlight on the Site and surrounding properties is assessed in GL Hearn's Daylight and Sunlight Report. In addition to identifying which of the surrounding properties are likely to be residential other commercial / community use properties have been assessed.

- 7.53 The analysis concludes that the proposed development causes very few impacts in daylight and sunlight terms, all of which are well within the BRE Guidelines.
- 7.54 The absence of any significant daylight and sunlight impacts, it is evident that no undue overshadowing will result from the development.
- 7.55 The requirements of DP26 in these regard will therefore be satisfied.
- 7.56 As discussed above, the increases in office and retail floorspace are relatively small in relation to the existing floorspaces of the same use. The building, its highly accessible location, servicing arrangement and proposed M&E strategy will prevent there from being any discernible difference in the impacts sets out in Policy DP26.
- 7.57 It is therefore considered that the proposed development satisfies the requirements of Policy DP26 and that, as a result, there would be no harmful impact on residential amenity either for the future residents of the development or their neighbours.

#### **Noise**

- 7.58 London Plan Policy 7.15 'Reducing Noise and Enhancing Soundscapes' seeks to minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of development proposals and to separate noise sensitive developments from major noise sources wherever practical.
- 7.59 Development Policy DP28 requires development to provide an acceptable noise and vibration climate for occupants and is designed to minimise exposure to vibration and external noise sources.
- 7.60 An Acoustic Assessment is submitted as part of this application which demonstrates that the proposed noise levels are in compliance with those set out by Policy DP28. In this way the requirements of Camden standard noise condition will be met.

#### **Sustainability & Energy**

- 7.61 Paragraph 96 of the NPPF states that local 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. The NPPF also outlines that new development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 7.62 The London Plan's climate change policies set out in Chapter 5 collectively require developments to make the fullest contribution to the mitigation of, and adoption to, climate change and to minimise carbon dioxide emissions.

- 7.63 London Plan Policy 5.2 sets out an energy hierarchy (Be lean, Be clean, Be green) within which development proposals should seek to minimise carbon dioxide emissions. The Policy also sets a target for non-domestic buildings to achieve a 40% improvement on 2010 Building Regulations for carbon dioxide emissions.
- 7.64 Both London Plan Policy 5.3 and Development Policy DP22 seeks to achieve the highest standards of sustainable design and construction. Policy 5.3 states development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation.
- 7.65 London Plan Policy 5.7 seeks to increase the proportion of energy generated from renewable sources. As set out within the accompanying Energy Statement the regulated CO2 emissions for this development have been reduced by 51.6% once energy efficiency measures and renewables are taken into account.
- 7.66 The proposed development is modest in scale and so its scope to achieve the targets set out in London Plan policies 5.2, 5.3 and 5.7 and Development policy DP22 is limited. Using all practical means, the development achieves a Carbon Saving of 6.7%. This is considered highly beneficial and satisfactory given the small scale of the development.

#### **Cycle Parking**

- 7.67 There is currently no cycle parking provision on-site.
- 7.68 A bicycle store with 44 stands is located on the lower ground floor. It meets BREEAM and Camden's minimum requirements of 1 stand every 250sqm as well as has an allowance for the retail units. These are secured in BREEAM compliant racks up to the BREEAM minimum required after which racks are provided that are more space efficient.
- 7.69 The requirements of Policy DP18 are therefore satisfied.

#### **Refuse Collection and Recycling**

- 7.70 The existing refuse storage arrangements will remain. Caneparo Associates have concluded in their Transport Assessment that the marginal additional waste created can be accommodated within the existing facilities.

## 8.0 SUMMARY AND CONCLUSIONS

8.1 The proposal has been formulated in accordance within the adopted London Plan (2015), Camden Core Strategy (2010), Camden Development Policies (2010), and all other relevant material considerations.

8.2 The Planning Statement has assessed these proposals against the Development Plan, as required by s38(6) of the Planning and Compulsory Purchase Act 2004.

### Planning Benefits

8.3 The proposals offer a wide range of significant planning benefits. These include:

- Reconfiguration and refurbishment of basement and ground floor office and retail floorspace;
- Relocation of office entrance on Kingsway to Great Queen Street, creating additional retail frontage along Kingsway;
- Reconfiguration of two A3 Café and Restaurant use units and creation of new shop fronts and entrances enhancing contribution to vitality and viability of Kingsway;
- Reconfiguration of B1(a) Office floorspace on upper levels with improved floor to ceiling heights and level access throughout;
- Remodelling and extension of storeys 7 and 8 to accommodate further additional B1 Office floorspace;
- Roof top extension also serves to enhance the character and appearance of the Kingsway Conservation Area both by replacing visually harmful roof structures and being of very high quality design in its own right;
- Modern plant and services will replace outdated and inefficient systems creating significantly more sustainable and energy efficient accommodation;
- The proposals will result in an additional 73m<sup>2</sup> GEA of A1/A3 Retail floorspace and 135m<sup>2</sup> GEA of additional B1 floorspace. In total, 3849m<sup>2</sup> GEA of refurbished Cat A B1(a) floorspace will be created.

8.4 The proposal is therefore considered to accord with the relevant policies of the adopted (and emerging development plan) and is consistent with national planning policy.

**LIST ENTRY SUMMARIES  
5 GREAT QUEEN STREET AND 60 PARKER STREET**

**APPENDIX 1**



# 5, GREAT QUEEN STREET

## List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: 5, GREAT QUEEN STREET

List entry Number: 1113212

## Location

5, GREAT QUEEN STREET

The building may lie within the boundary of more than one authority.

County: Greater London Authority

District: Camden

District Type: London Borough

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 17-Apr-1979

Date of most recent amendment: Not applicable to this List entry.

## Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 477661

## Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

## List entry Description

### 9.0 Summary of Building

Legacy Record - This information may be included in the List Entry Details.

### 10.0 Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

## **11.0 History**

Legacy Record - This information may be included in the List Entry Details.

## **12.0 Details**

CAMDEN

TQ3081SE GREAT QUEEN STREET 798-1/106/674 (North West side) 17/04/79  
No.5

II

Terraced house. Early/mid C18, with late C19 front. Red brick with stone dressings. 4 storeys. Late C19 shopfront with 4 large round-headed panes (1 forming part of entrance) divided by twisted cast-iron colonnettes. Continuous glazing on each floor above, divided into four by cast-iron columns supporting continuous stone lintels. Cornice and parapet. INTERIOR: staircase with an open string on the lower flights and closed above, paired newel posts, twisted balusters three to each step, some may be replacements as there are earlier and later types, panelled dado. Original doors and panelling in first floor rooms though over doors and first floor front fireplace c1900. Ground floor office, some original panelling.

Listing NGR: TQ3053181378

# 60, PARKER STREET

## List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: 60, PARKER STREET

List entry Number: 1380332

## Location

60, PARKER STREET

The building may lie within the boundary of more than one authority.

County: Greater London Authority

District: Camden

District Type: London Borough

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 17-May-2000

Date of most recent amendment: Not applicable to this List entry.

## Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 480318

## Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

## List entry Description

### 13.0 Summary of Building

Legacy Record - This information may be included in the List Entry Details.

### 14.0 Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

## **15.0 History**

Legacy Record - This information may be included in the List Entry Details.

## **16.0 Details**

TQ 3081 PARKER STREET 798-1/106/10160 Camden 17-JUN-00 60

### **II**

Workshop, probably associated with the coach building trade, later part of a printing and publishing works and finally offices. Built after 1815 and before 1828. Some later C19 alterations to rear windows, C20 shopfront and some internal modifications

**EXTERIOR:** Built of stock brick with stone parapet. Pitched slate roof with central glazed panel, concealed by parapet. Four storeys: three upper floors have 5-light continuous windows with wooden architraves and timber tilt and turn sashes retaining original crown glass to front. Second floor windows have 24 panes, first and third floors have 16 panes. Left side lights to first and second floor windows have been later subdivided, probably to incorporate toilet accommodation. End full-height brick pilasters. Ground floor has late C20 wooden shopfront in traditional style with deep moulded fascia and central pilasters, 3 bay shopfront with multi-pane windows and 8 panelled door with low letterbox. Rear elevation is also of stock brick with end full-height pilasters and retains the original wooden architraves but later C19 wooden casements with pivoting tops have been inserted. First floor door originally to two storey rear extension most of which has been demolished at time of survey except for some cast iron columns. Ground floor has right side round-headed entrance.

**INTERIOR:** Ground floor was subdivided in later C20 with plasterboard partition. Each floor has floorboards set on two large axial beams spanning 7 metres with chamfer and runout stop, early C19 in date. Front beam on the ground floor has a two inch chamfer and is probably a replaced reused beam. Basic open tread stairs without handrail between floors. Top floors narrow towards right side of rear elevation over cambered arch, probably to provide light to already existing buildings nearby. Early C19 scientific kingpost roof with purlins, ridgepiece and rafters with central glazed panel.

## **17.0 Selected Sources**

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: TQ 30523 81390