HT/LON.0265

4th November 2016



Gideon Whittingham Senior Planning Officer London Borough of Camden 5 Pancras Square London N1C 4AG

Dear Mr Whittingham

<u>King's Cross Methodist Church, 6 Crestfield Street, London</u> <u>Application Ref: 2015/7013/P</u>

Pegasus Group are instructed by West London Mission Circuit of the Methodist Church with regard to the above application which seeks planning permission for the "Demolition and redevelopment to provide replacement church facilities (Use Class D1); Community Facilities (Use Class Sui Generis); replacement on-site Methodist Chaplaincy House (Sui generis) and No. 11 residential apartments (Use Class C3) including the installation of the necessary plant, ventilation and extraction, cycle storage and refuse and waste facilities demolition is currently pending consideration".

Further to our recent correspondence, and without prejudice to the pending planning application, please find enclosed herewith a 'full' façade retention study. The study has been prepared by Dexter Moren Associates, with Heritage Commentary from Chris Surfleet (of Bidwells) and input from Pegasus Group.

Section 3 of the Planning Statement submitted as part of Application 2015/7013/P provides a description of the current building and you will recall from our site visit that the building is in a poor state of repair and requires significant upgrade. This letter presents a comprehensive summary of the development options considered by the Applicant for the King's Cross Methodist Church.

For clarity, these options are as follows:

- Do-Nothing
- Repair and Maintain
- •
- Demolition and redevelopment

In addition to the above options, at the request of Officers at the London Borough of Camden, the West London Mission Circuit of the Methodist Church has given consideration to a façade retention and redevelopment option.

23 Hanover Square, London W1S 1JB T 0203 705 8060 www.pegasuspg.co.uk

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Do Nothing & Repair and Maintain

Both the 'do-nothing' and 'repair and maintain' options have been rejected by the West London Circuit of the Methodist Church for the reasons set out on Page 7 of the submitted Design and Access Statement (Ref: **2015/7013/P**).

Façade Retention and Redevelopment

The façade retention and redevelopment option is presented within the enclosed façade retention study, and this study identifies the limitations imposed on the use of the church through façade retention compared to the submitted scheme. It also provides an assessment of the townscape implications of façade retention. It was agreed in our correspondence that the Council is not seeking a full restoration scheme (although restoration in part was considered to be welcome). It was also agreed that the retention scheme could support minor additions in the form of a mansard roof and side extensions. To this effect, the façade retention option considers both a restoration scheme and a retention scheme, with consideration given to the restoration of the windows and the porch - both of which have been discounted for reasons set out within the attached document.

As detailed on Page 19 of the façade-retention study, the resulting development would create a confused piece of townscape which does not support the objectives of good design. Furthermore, the document demonstrates that, internally, the floorspace created is compromised and inefficient for use by the Church. Therefore, this option does not provide a feasible development option.

In terms of the residential element delivered by the scheme, this would be reduced in number due to the limitations imposed by the retained structure. There would be no amenity space and the unit sizes would not meet the specific requirements of the Technical Housing Standards (2015).

As a result of the above, the façade retention scheme proves neither practical nor viable for the Applicant.

This contrasts with the Applicant's planning application for the demolition and redevelopment of Kings Cross Methodist Church.

Demolition and Redevelopment

Having entered into pre-application discussions with the Council, the proposed development (which is currently pending consideration) would secure the continuing use of the site by Kings Cross Methodist Church through enabling residential development.

The Heritage Statement submitted by the Applicant contests the Council's view regarding the requirement to retain the existing structure. It concludes that due to the substantial alteration of the Chapel over time, its contribution to the significance of the King's Cross St Pancras Conservation Area is at a low-level. In the context of Paragraph 138 of the National Planning Policy Framework, which refers to the loss of a building within a Conservation Area, Paragraph 134 ("less than substantial" harm) would apply. Paragraph 134 of the NPPF clearly states that when a development proposal would lead to "less than substantial" harm to a designated heritage asset, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

The public benefits of this proposal have been clearly documented in the submitted Planning Statement (Pages 3 – 7) whereby the existing and future community projects are discussed.



The proposed demolition and retention option would provide an additional 455 sq.m of community floorspace and would secure the historic Church use in this location.

Furthermore, the proposed design of the Birkenhead Street elevation seeks to reinforce the prevailing character of the street through the provision of a well-designed and harmonious replacement building which makes a positive contribution to the townscape quality of the Street. It is considered in the Heritage Statement that the proposed building would make a 'positive contribution' to the Conservation Area. This would be consistent with the Council's assessment of the existing building's contribution, and demonstrate that no net loss would occur to the character and appearance of the Conservation Area as the result of the development.

As proposed, the removal of the Birkenhead Street façade will allow the continued use of the site as a place of worship and as a place to undertake and expand the various community outreach programmes. The proposed façade provides a high quality design response which reinforces and enhances character of Birkenhead Street and the King's Cross Conservation Area as a whole. The townscape and public benefits of the proposal therefore clearly outweigh the retention of the existing Birkenhead Street facade.

In order for the Applicant to continue to serve the existing and future communities at King's Cross, modern, functional, accessible and adaptable spaces are required. To assist with the viability of the project 11 residential apartments are proposed, with a dedicated access from Birkenhead Street. The residential apartments will be of the appropriate size and will each have their own amenity space.

I trust that the above and enclosed is of assistance and provides the necessary justification requested by the Council. Should you wish to discuss any of the matters raised above in further details then please do not hesitate to contact me.

Yours Sincerely

Hannah Trubshaw

Associate

e-mail: hannah.trubshaw@pegasuspg.co.uk