

King's Cross / St. Pancras Conservation Area Map  
(Application Property highlighted in red)

**9.0 CONSERVATION AREA APPRAISAL**

**9.1** The Property lies within the King's Cross / St. Pancras Conservation Area as the map highlights. The King's Cross Road / St. Pancras Conservation Area has been known for almost two centuries as a major gateway into central London.

**9.2** By the mid-19th Century, King's Cross was the busiest goods handling area in Britain, which reflected into its building heritage. Today, King's Cross / St. Pancras Conservation Area contains some of the most important historic buildings and structures in the country and has areas of great interest and variety.

**9.3** The Camden Council's King's Cross / St. Pancras Conservation Area Audit notes that:

*"New development should be seen as an opportunity to preserve or enhance the character or appearance of the Conservation Area. New development should respect the built form and historic context of the area, local views, existing features such as building lines, roof lines, elevational design, and where appropriate, architectural characteristics, detailing, profile, and materials of adjoining buildings. Proposals should be guided by the UDP in terms of appropriate uses." (p.58)*

**9.4** The King's Cross / St. Pancras Conservation Area Audit includes guidelines for development proposals in the conservation area. With regards to this, it states that:

*"The Conservation Area includes a variety of building types, ages and styles. Modern development has not always respected the area's context. Developments which are overtly modern will not be resisted, provided they have regard to the layout, height and scale of existing development within the Conservation Area. "What is important is not that new buildings [in Conservation Areas] should directly imitate earlier styles, but that they should be King's Cross 59 designed with respect for their context, as part of a larger whole which has a well-established character and appearance of its own." (PPG15, s. 4.17). Regarding the setting of a listed building, PPG15 at 2.16 states: 'Sections 16 and 66 of the [LBC] Act require authorities considering applications for planning permission or listed building consent for works which affect a listed building to have special regard to certain matters, including the desirability of preserving the setting of the building.' (p.58)*

**9.5** With regards to this, proposals outlined in the drawings and images included as part of this Planning submission look to respect and enhance the heritage of the listed properties and the character of the King's Cross / St. Pancras Conservation Area.





**King's Cross / St. Pancras Conservation Area Map**  
 Application Property highlighted in Red,  
 Neighbouring listed buildings highlighted in Blue

**9.6 LISTED BUILDINGS IN KING'S CROSS / ST. PANCRAS CONSERVATION AREA**

9.7 Two properties in close proximity to the Land to Rear of 159-163 Kings Cross Road are known as being listed, namely:

**01. Derby Lodge, flats 1-48 (II) on Britannia Street:**

**02. Derby Lodge, flats 49-144 (II) Wicklow Street: No. 75 (II);**

They fall under the following description given by Historic England:

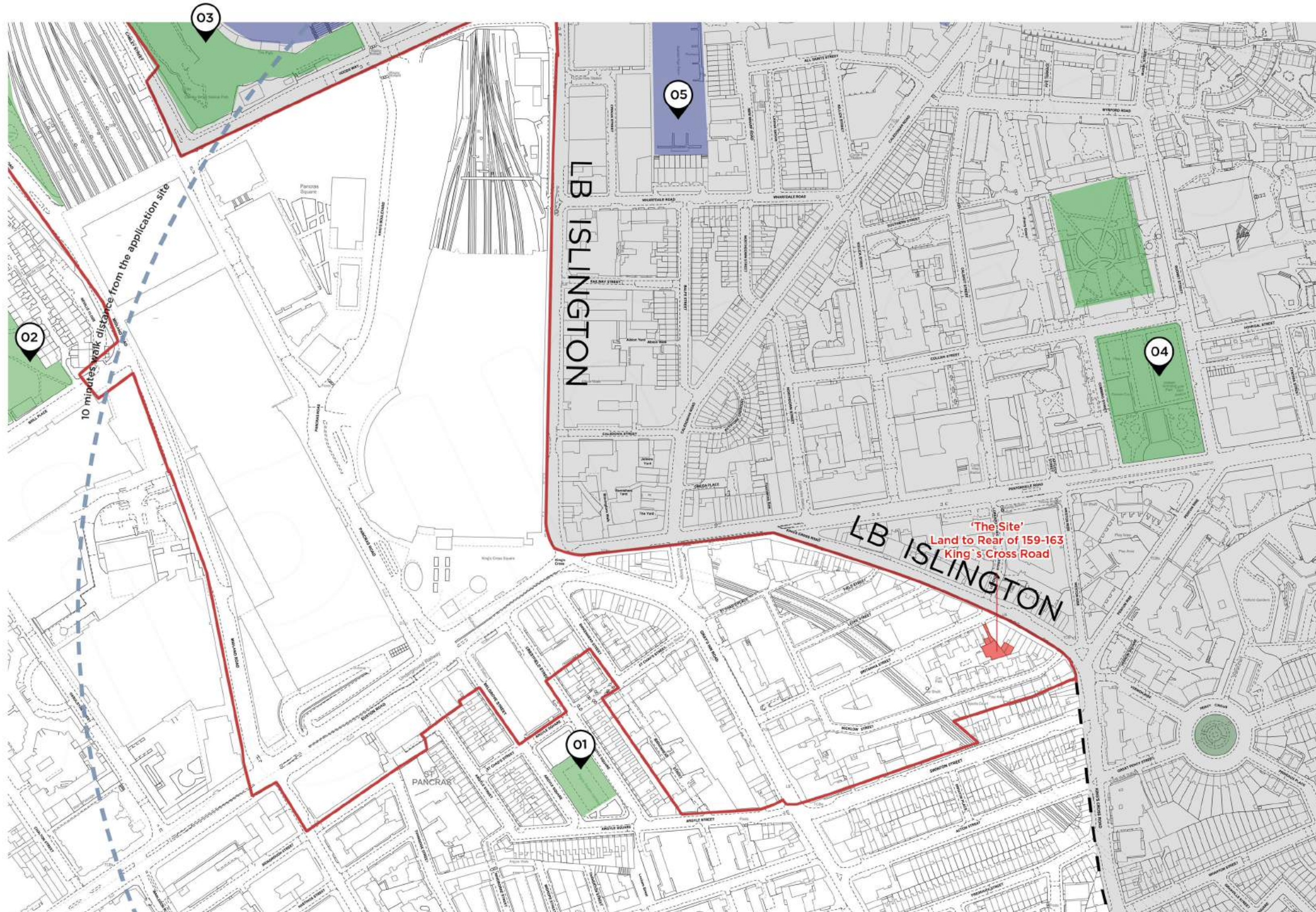
*'Flatted philanthropic accommodation. 1865. By the Improved Industrial Dwellings Company founded by Sydney Waterlow; builder Matthew Allen. Painted stucco cement treated as banded rustication to the ground floor; the same material used on balcony-stair recesses (treated as Tuscan pilastrade) and to window aedicules. Cast-iron railings to balconies of authentic lattice pattern; metal filigree spandrels to brick pier supporting balcony; metal railings to roof over recess; infill to ground floor for security purposes; late C20 wall treated as banded rustication to match original.*

*EXTERIOR: 5 storeys. Nos 1-10 with one-window, brick range to either side of full-height balcony recess which is divided into two broad bays by a brick pier with stylised capital from which spring filigree spandrels to lintels. Nos 11-36 entered off similar balcony-stair recess; the flanking ranges to either side, however, have two windows each, suggesting a different plan form. Another notable difference is the small round-arched lancet with screen-like inset found between each pair of windows to this section. The ground-floor windows to block containing units 1-10 are tripartite.*

*INTERIORS: not inspected. Forms a group with Derby Lodge (formerly Buildings), flats 37-102, to the south in Wicklow Street (qv). Among the earliest surviving examples of the work of Waterlow's influential and prolific IIDC.'*

**Key:**  
■ Site  
■ Listed Buildings





**Amenity Map**  
(Application Property highlighted in Red)

**10.0 AMENITY ASSESSMENT**

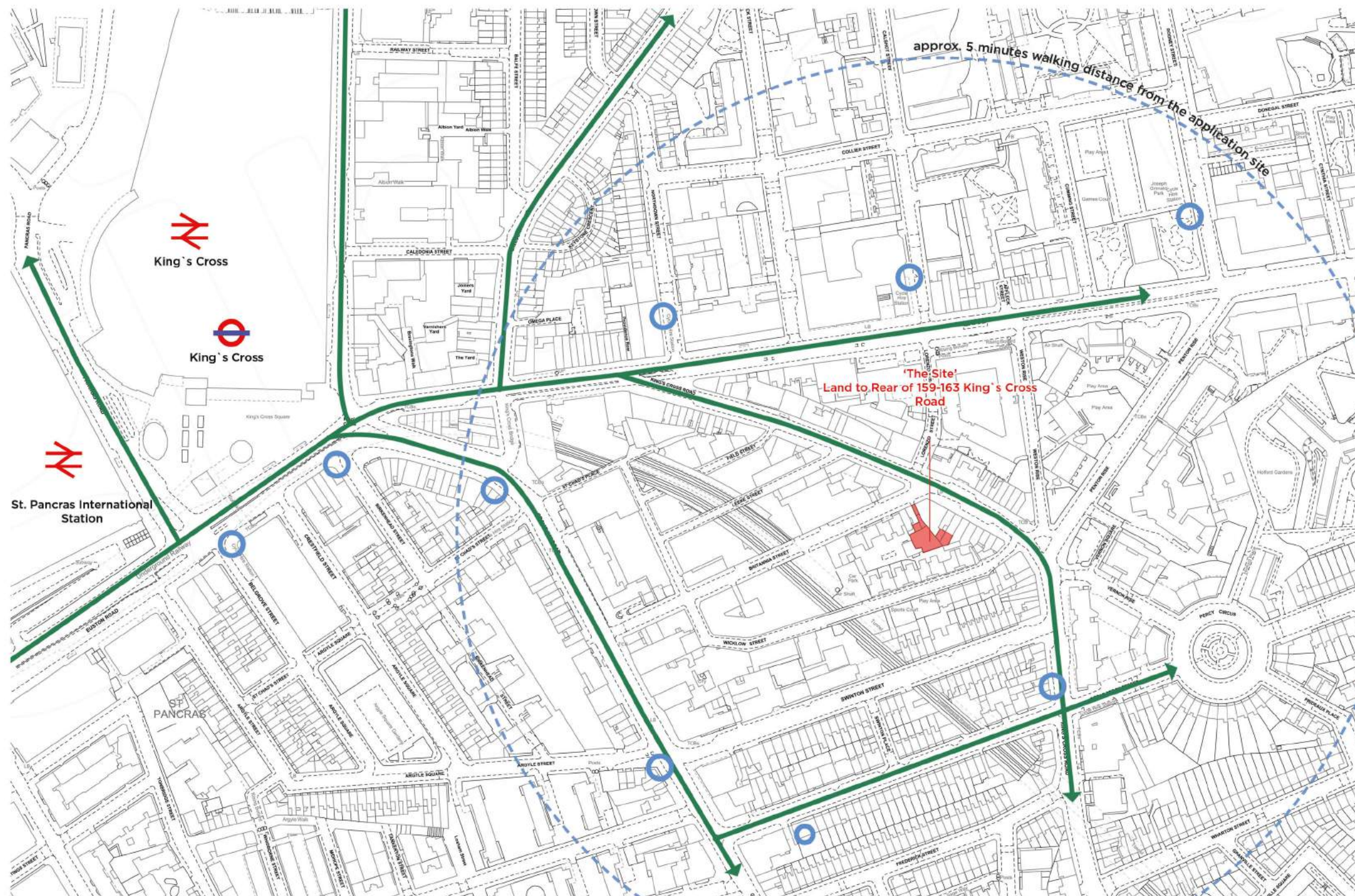
**10.1 Public Amenity**

The application site has good access to numerous nearby, high-quality gardens and green spaces. They are all maintained to an excellent condition and should provide adequate amenity space for the users of the proposed development.

The closest of these are listed below:

1. **Argyle Square Garden**  
Described by the London Garden's Online as: 'originally restricted to the residents of Argyle Square and a few adjoining houses, but it is now a public garden. Six mature London plane trees from the earlier layout survive and it is overlooked by surviving C19th terraces along most of three sides. Enclosed by reproduction cast iron railings, it has been redesigned to incorporate a tarmac sports pitch, children's playground and landscaping with shrubs and planting.'
2. **St. Pancras Gardens**  
Described by the London Garden's Online as being: 'laid out in their present form in 1890-91, and have a geometric layout with paths, mature trees, grass and rose garden, with some monuments remaining.'
3. **Camley Street Natural Park**  
Described by London Garden's Online as being: 'inspired by nature: a mosaic of meadow, marsh woodland and open-water habitat. These habitats are intensively managed to maintain their diverse wildlife value and include many species of birds, bees, butterflies and amphibians, as well as a rich variety of plants.'
4. **Joseph Grimaldi Park**  
Described in Wikipedia as a park that 'extends to 0.5 hectares (1 acre) and includes a tarmac ball court, children's playground and shrub beds. Notable trees include specimens of lime, London plane and horse chestnut.'
5. **Regent's Canal**  
Described in the Canal & River Trust as 'The canal links a diverse cross-section of London's attractions. From the colourful collection of narrowboats at Little Venice basin in Maida Vale, it runs on through Regent's Park. Here it is overlooked by a vast aviary - part of London Zoo. In Camden, it passes the craft stalls and quirky clothing shops of the famous market, a centre for London's alternative culture.'





**Transport Map**  
(Application Property highlighted in Red)

**11.0 TRANSPORT ASSESSMENT**

**11.1 Transport Links**

The application site has excellent access to nearby transport links, with a Public Transport Accessibility Level [PTAL] rating of 6b, the site has the highest possible rating providing excellent accessibility (0 lowest; 6b highest).

**11.2 Underground/National Rail**

King's Cross St Pancras underground station is located approximately 500 metres north west of the application site and is served by Circle, Hammersmith & City, Metropolitan, Northern, Piccadilly and Victoria underground lines. As such the station offers access to a large proportion of London.

King's Cross overground station is located approximately 500 metres north west of the site and offers access to a range of destinations including Edinburgh, Leeds and Peterborough.

St Pancras International station is similarly located approximately 500 metres from the application site and operates services to a range of destinations including Brussels, Bedford and Brighton.

**11.3 Bus**





The nearest bus stop to the site is located approximately 130 metres walk north on King's Cross Road. Bus routes 17, 45, 46, 259 and N63 operate from this stop.

The Institution of Highways and Transportation (IHT) states that the maximum walking distance to a bus stop should be 400 metres. With regard to this, there are a further 7 bus stops within walking distance of the application site.

**11.4 Car Parking**

There will be no impact on the existing parking arrangement. The proposed is a car free development.

For further information please refer to Transport Statement by Motion.

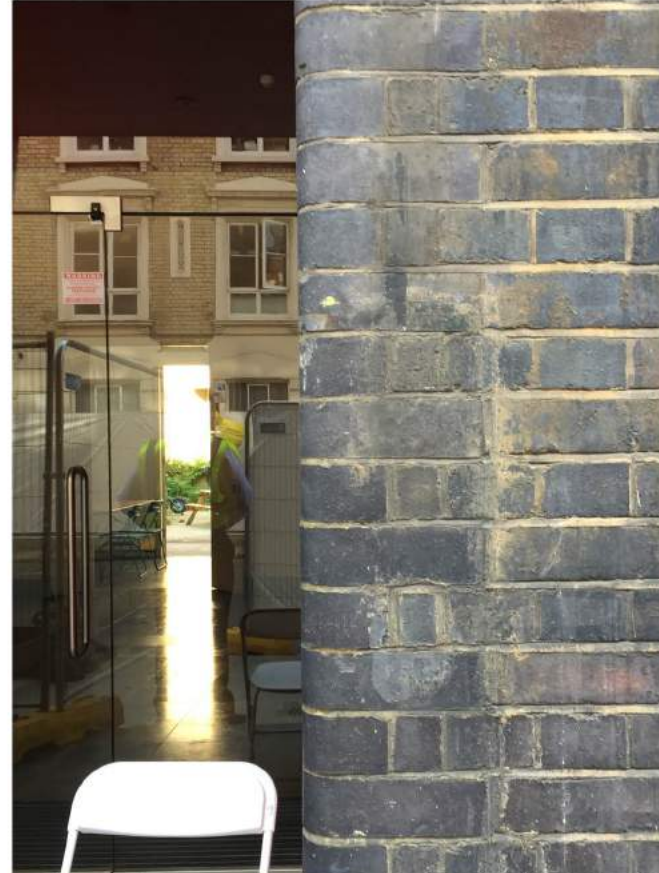
- Key:**
-  Cycle Hire Stations
  -  Underground Station
  -  Mainline train station
  -  Bus route (6, 16, 46, 98, 187, 332, 414)





SECTION TWO:  
**DESIGN PROPOSAL**





01 Existing Materiality



**12.0 EXISTING CONTEXT & MATERIALITY**

**12.1** The photographs adjacent highlights the varying brick tones, materiality and brick coursing within the immediate site. The variety of bricks and coursing gives the site a unique character, whereby there is not one over arching colour pallet.

Across the King's Cross area, there are many examples of contemporary architecture and modern interventions. Immediate to the site at No. 28 Britannia, a contemporary residential extension which is located South East of the application site. At No. 1-6 Field Street a contemporary mixed used development located to the North west of the site. The distinctive metal facade at No. 1-6 Field Street can be appreciated from varies vistas around the application site area.

Throughout the design we have been keen to reference the surrounding brick facades while bringing a sense of lightness to the scheme by carefully considering the glazed elements. We believe this results in a proposed envelope that respects its surroundings while providing a high quality interior.

The architectural intent also looks to incorporate large areas of masonry and steel framing as a reference to the site's former historic light-industrial use.



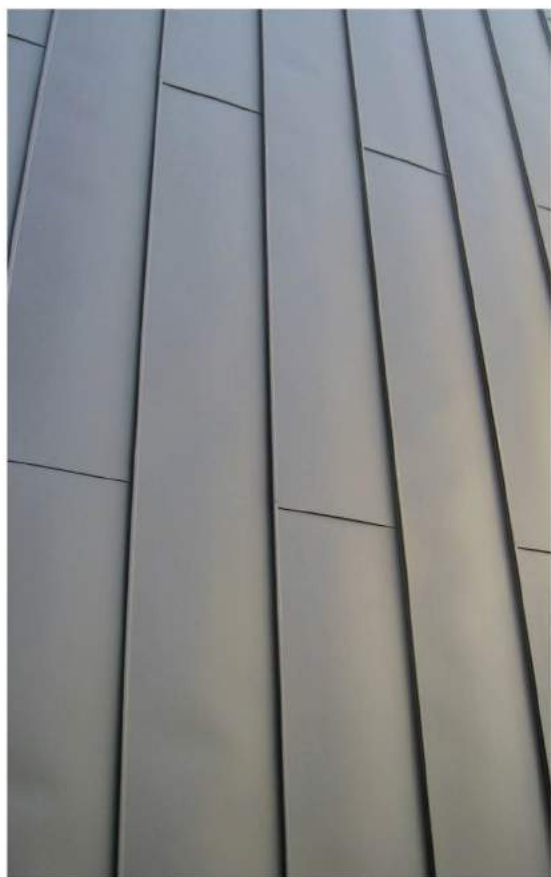
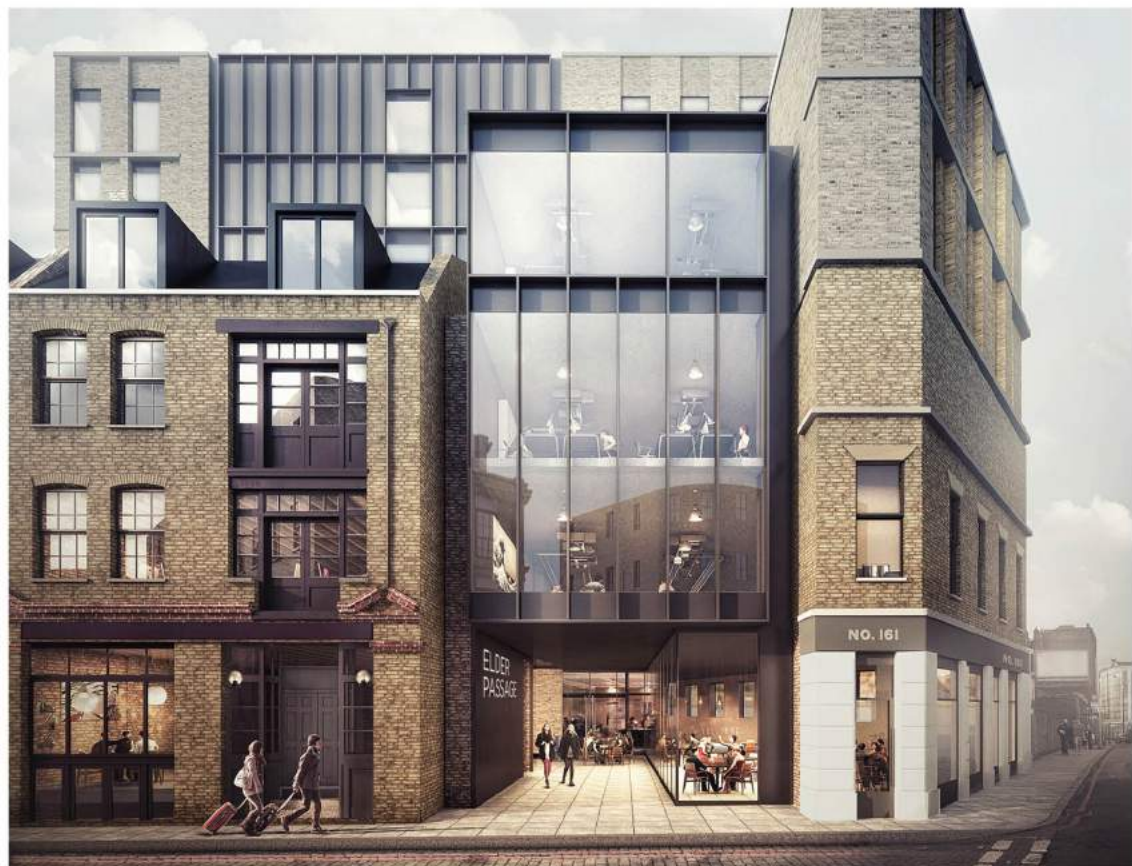
02 No. 28 Britannia



03 No. 1-6 Field Street







01 Precedents





**13.0 PRECEDENTS**

**13.1** The images to the left have served as useful precedents of comparable projects across London.

The Newport Gallery by Caruso St John Architects, and the Blossom Street Development by Stanton Williams have served relevant precedents for this proposal.

In all examples, the architects have managed to enhance the existing site conditions with contemporary additions that reflect the character of their surroundings.

The images on the preceding page presents photographs of the site and surrounding context, to give a sense of the scheme's materiality and an indication of how the architectural proposal sit within King's Cross / St. Pancras Conservation Area.



14.0 PRE-APPLICATION ADVICE

14.1 Minutes of Pre-Application Meeting

On 12.07.2016, MW-A submitted a pre-planning document to determine the feasibility in planning terms, of the works proposed in this statement as part of a full planning application.

MW-A have carefully considered this pre-application advice in preparation of this detailed planning application, where necessary the proposal has been amended in accordance with the recommendations contained in the minutes of the pre-applications meeting, and such amendments have been reviewed and are summarised in this section.

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**Date: 24/08/2016**  
**Our ref: 2016/3862/PRE**  
**Contact: Laura Hazelton**  
**Direct line: 020 7974 1017**  
**Email: laura.hazelton@camden.gov.uk**

Phil Chan  
 66-68 Margaret Street  
 London  
 W1W 8SR


*By email*

Dear Mr Chan

**Re: 159 - 163 King's Cross Road, WC1X 9BN**

Thank you for submitting a pre-planning application enquiry for the above property which was received on 12 July 2016 together with the required fee of £3,600.00.

- Drawings and documents**  
 Cover letter dated 08/07/2016 and Pre-planning document dated July 2016.
- Proposal**  
 Redevelopment of the property over ground floor and first floor levels, and proposed second floor set-back to provide additional employment floorspace, Excavation of basement floor level to accommodate additional floor space; Proposed lightwells providing daylight and ventilation to all floors
- Site description**  
 The application site is located on the Southern side of King's Cross Road, on a "land-locked" site behind a row of 3-storey terraces which front Britannia Street and King's Cross Road. Access onto the site is via a mews opening between Nos.1 and 3 Britannia Street. The site is a keyhole development which opens up to a larger piece of land to the rear. The existing building on site is equivalent to 2 storeys and constructed from yellow stock brick and has a double pitched roof covered by corrugated sheets and glazed roof lights. The site is not visible from the public realm at street level, apart from a pair of black-painted wooden stable doors to the Britannia Street frontage, alluding to the site's former use as a light industrial warehouse.  
  
 The site is surrounded by Grade II Listed buildings at Nos. 49-144 Wicklow Street and Nos.1-48 Britannia Street. The site's adjacent terrace group at Nos.3-5 Britannia Street and



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Nos.149-163 King's Cross Road have been identified as buildings that make a positive contribution to the wider King's Cross Conservation Area.

- Relevant planning history**  
  
**2012/2648/P** - the renewal of a Full Planning Application for the 'Change of use and works of conversion of the existing light industrial building (Class B1c) including extension at first and second floor level, to provide 2 x flexible Class B1 units at ground and first floor levels, and 1 x self-contained residential unit (Class C3) at second floor level'. Withdrawn.  
  
**2008/2940/P** - Change of use and works of conversion of the existing light industrial building (Class B1c) including extension at first and second floor level, to provide 2 x flexible Class B1 units at ground and first floor levels, and 1 x self-contained residential unit (Class C3) at second floor level. Granted 19/05/2009.  
  
**2005/4752/P** - Change of use of the mezzanine first floor from light industrial use (Class B1) to residential flats (Class C3) to provide 4 no. one bedroom flats including works of conversion comprising the installation of roof windows new windows on the southwest elevation and the formation of a lightwell at first floor level. Refused 11/12/2005.  
  
**2004/3498/P** - Conversion of mezzanine floor from light industrial (Class B1) to four residential flats (4x1 bed) together with roof extension and associated alterations. Refused 27/10/2004.  
  
**2004/5097/P** - Retention of existing B1 unit and creation of 4 no. one bedroom flats above. Alterations at roof level including raising the existing roof profile and creation of new windows and rooflights. Refused 04/02/2005.  
  
**9100237** - The change of use of the warehouse(B8) to light industrial B1(C) at the rear of No.163 Kings Cross Road the retention of retail (A1) and residential upper floors at No.163 Kings Cross Road two shop units within the A Class Schedule at No.159/161 King's Cross Road and unrestricted B1 use between shops and B1(C) and upper floors of No. 159/161 Kings Cross Road. Approved December 1991.
- Relevant policies and guidance**  
[National Planning Policy Framework 2012](#)  
[The London Plan March 2016](#)  
[LDF Core Strategy](#)  
 CS1 (Distribution of growth)  
 CS5 (Managing the impact of growth and development)  
 CS8 (Promoting a successful and inclusive Camden economy)  
 CS11 Promoting sustainable and efficient travel  
 CS13 Tackling climate change through promoting higher environmental standards  
 CS14 (Promoting high quality places and conserving our heritage)



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[LDF Development Policies](#)  
 DP13 Employment sites and premises  
 DP16 The transport implications of development  
 DP17 Walking, cycling and public transport  
 DP22 Promoting sustainable design and construction  
 DP24 (Securing high quality design)  
 DP25 (Conserving Camden's heritage)  
 DP26 (Managing the impact of development on occupiers and neighbours)  
 DP27 Basements and lightwells  
 DP28 Noise and vibration

[Camden Planning Guidance 2011/2015](#)  
 CPG1 (Design)  
 CPG3 (Sustainability)  
 CPG4 (Basements and Lightwells)  
 CPG5 (Town centres, retail and employment)  
 CPG6 (Amenity)  
 CPG7 (Transport)  
 CPG8 (Planning Obligations)

[King's Cross St Pancras Conservation Area Statement \(2003\)](#)

- Site Specific constraints**
  - Kings Cross St Pancras Conservation Area
  - Contaminated sites potential
  - CIL Charging Zone A
  - Central London Area
  - Local Flood Risk Zone
  - Strategic View Cone
  - Subterranean (groundwater) flow
  - Slope stability
- Proposal**  
 The proposal consists of the following:
  - The demolition of the existing building
  - The change of use of the host building from Class B1c (light industrial business) use to Class B1a (office) use/ D1 (non-residential institution) use.
  - Erection of a new 3 storey building.
  - Excavation of new basement floor level
  - Excavation of new lightwells.



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- Demolition of the existing building.
- Land use.
- Design (the impact of the proposal on the character and appearance of the host building and wider Kings Cross St Pancras Conservation Area).
- Amenity (the impact that the proposal may have on the amenity of neighbouring properties in terms of outlook, daylight and privacy).
- The impact of the proposal on the local transport infrastructure.
- Waste storage/collection
- The impact of the basement excavation.
- Sustainability.

9. **Demolition of the existing building**

There are no public views of the building due to its location within a 'land-locked' site, and the King's Cross St Pancras Conservation Area Statement does not describe it as making a positive contribution to the conservation area.

The building is a typical 19<sup>th</sup> century warehouse constructed of London stock brick. It is not considered to feature any architectural details of merit or historic interest. The Council would not object to its demolition, subject to its replacement by a building of suitable design and quality which would enhance the character and appearance of the area.

10. **Land use**

Mixed use

The Council will require a mix of uses within development where appropriate, including a contribution towards the supply of housing, in order to facilitate sustainable development and reduce the need to travel between homes, services and jobs (Policy DP1). In the Central London Area where more than 200 sqm (gross) additional floorspace is provided, we will require up to 50% of all additional floorspace to be housing.

The Council will require any secondary uses to be provided on site. Where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally, a payment-in-lieu.

If you do not have a suitable alternative site, a detailed assessment should be submitted demonstrating no other suitable sites within the ward (or adjoining wards) are capable of providing new residential/secondary uses accommodation, typically by way of a change of use. Should it be demonstrated to the Council's satisfaction that suitable residential accommodation/secondary uses cannot be provided on site or that no alternative site is available in the area, we may accept a payment in lieu of provision, directly related in scale and kind to the development proposed.

In this instance, the development would result in an increase in floorspace of 517.1 sqm (to give a total GIA of 936.7 sqm) and would therefore trigger the requirement for residential

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floorspace to be provided. Where appropriate, up to 50% of the additional floorspace should be provided for housing.

The pre-application proposal does not include residential floorspace within the development, but includes a secondary use at basement level for flexible B1/D1 use – specifically, a gallery/exhibition space.

1) Since our pre-app meeting you have provided additional justification as to why the site is considered unpractical for on-site housing and confirmed that the applicant would be willing to make payment in-lieu. It is recommended that this information is included within the submission of any future planning application.

These reasons include that fact that there is only one access route into the site (off Britannia Street) which would have to be shared by office users and residential occupants. This may raise issues in terms of everyday access/egress and emergency access. It was therefore felt that the inclusion of a residential unit would be incompatible with the primary business use due to the constrained nature of the site. In addition, the site is closely surrounded by existing residential buildings which may present issues in terms of privacy and overlooking of neighbouring habitable rooms.

Continued business use on site

Development Policy DP13 (Employment sites and premises) states that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business use unless:

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

2) Where it is proposed to redevelop employment land for another business use, including offices, the Council will seek to retain physical features that will enable the flexible use of the premises for a range of business purposes. The typical design features that enable flexible use are:

- clear and flexible space with few supporting columns;
- adequate floor to ceiling heights;
- wide doors/corridors;
- loading facilities;
- large amounts of natural light;
- availability of a range of unit sizes; and
- space for servicing by/parking of commercial vehicles.

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MWA Response:

- 1) Noted. This information is included as part of this planning application. Refer to Planning Statement by Bidwells
- 2) Noted.
  - Open plan layouts are provided on all floors
  - Generous floor to ceiling heights of 3.1m to basement, 2.7m to ground, first floors and second have been provided.
  - The open plan layout combined with the rooflight detail and the central void, will provide a generous amount of natural light.
  - A larger lift is proposed.

6

The proposed redevelopment of the site would result in the loss of the existing B1c unit spread over ground and mezzanine floors, and the creation of new offices spread over three floors, with a gallery (D1 use)/office (B1a use) at basement level.

It is acknowledged that the application site is very awkward, with only one access point and residential buildings surrounding. The application building was previously used for the manufacturing of mirrors, but is used solely for storage at present. Due to the existing site constraints, it is unlikely that continued light industrial use would be appropriate, and the change of use to offices is therefore considered acceptable.

3) The proposed arrangement seems to offer an acceptable level of flexibility to provide for a variety of potential business users, and could be converted back to light industrial use in the future if necessary. All floors, including the new basement floor, would benefit from generous floor to ceiling heights, and the proposal allows for a generous sized internal goods lift and wide doors with level access at ground floor level.

The development would provide new office spaces of different sizes which benefit from access to outside amenity spaces. Each office would be provided with an acceptable level of natural daylight/sunlight, and it is considered that the development would produce a good standard of office accommodation. The existing mezzanine floor level is restricted in size and on balance, the proposed redevelopment is considered to improve the quality of business floorspace and improve the long term viability of the unit.

Provision of D1 floorspace

In addition to office floorspace, the proposal would introduce flexible B1a/D1 floorspace at basement level, specifically, as a gallery/exhibition space.

The provision of a gallery as a secondary use of the site is considered acceptable provided it didn't result in an overall loss of B1 floorspace and there were no negative impacts on neighbouring amenity or the local transport network.

11. **Design**

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions to existing buildings are proposed. The following considerations contained within policies CS5, CS14 of the Core Strategy and policies DP24, DP25 and DP26 of the Development Policies Document are relevant to the application: development should consider the principle of the extension, the impacts of the development on the character, setting, context and the form and scale of neighbouring buildings, and the residential amenity impacts of the proposals.

Camden's Development Policies Document is supplemented by planning documents providing further detailed guidance, including CPG1 (Design), CPG4 (Basements and Lightwells) and CPG6 (Amenity), as well as the Kings Cross St Pancras Conservation Area Statement.

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MWA Response:

- 3) Noted. This has been further explored in the Planning Statement by Bidwells.

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Height, scale and massing

The proposals comprise a three-storey development, to replace the existing two storey warehouse building. The additional storey will not be visible from the surrounding streets.

4) The overall height of the proposed development is comparable to the previously approved scheme, with the exception of additional height at first floor level close to the rear of 155-157 Kings Cross Road (not included in the previous site boundary). There is a slight increase in scale and massing when compared to the previously approved scheme, as a result of the additional first floor massing to the eastern end of the site, as well as some additional massing at second floor level.

The additional massing will need to be carefully tested, to ensure that the proposed development does not have an adverse impact on the visual amenity of neighbouring occupiers, and that the development will have a comfortable relationship with the massing of the surrounding buildings.

Design

5) The proposed design approach is considered to be of a high quality, and represents an intelligent response to a very constrained site. The proposed layout, with the internal courtyard is considered to be an efficient way to provide access to individual units, while maximising light provision. The saw-tooth roof design is a distinctive feature, which will also incorporate vertical glazing to provide natural light to the office space. It is noted that the proposed development incorporates a large amount of glazed areas, to provide natural light within the building. As discussed on site, the use of louvres to mitigate overlooking issues is welcomed.

Limited details have been provided about the proposed materials, however it was discussed on site that brick is proposed to be the main building material, as a contextual response to the existing surroundings, which is welcomed. The use of steel framing for glazed areas could also be a way of referencing the site's former light-industrial use and character.

6) The provision of green roofs and landscaping on flat-roofed areas is welcomed, however the suitability of terrace locations / screening options will need to be tested to ensure that the terraces don't have an adverse impact in terms of amenity.

The proposed retention of the timber entrance doors to the site from Britannia Street is welcomed, maintaining a reference to the site's historic light industrial use.

12. **Amenity**

Policy CS5 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. Policy DP26 supports this, by seeking to ensure that development protects the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of neighbouring residents. This includes privacy/overlooking, outlook and impact on daylight and sunlight.

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MWA Response:

- 4) The proposed massing has been carefully considered to allow for additional employment space. Refer to Daylight & Sunlight Analysis by Malcolm Hollis.
- 5) Refer to Proposed Drawings and Design Proposal Section 2 of this report. Material palette to reflect the site's former light-industrial use.
- 6) Following Camdens post-submission advice in December 2016, terrace areas have now been removed with exception of one terrace where one has previously been consented in 2009. The doors are to be retained and refurbished. Refer to Proposed Drawings.



8

**Daylight/Sunlight**

7) Although full details have not been provided, the pre-application document states that the proposals would satisfy the BRE guidelines in terms of sunlight and daylight levels reaching Derby Lodge to the south west. The council would also expect the full report to demonstrate that the development did not result in a discernable decrease in daylight levels to the rear windows of properties along Kings Cross Road and Britannia Street.

**Outlook**

Although the proposal includes the erection of an additional storey, and consequently a larger visual addition than what currently exists, the new storey would be set back away from the boundary with the closest residential property, Derby Lodge. This would help to limit the impact on neighbouring outlook, and it is not considered to increase their sense of enclosure or unduly impact on their outlook. The inclusion of planted terraces (and possibly green roofs) would help to soften the impact of the development.

**Overlooking**

8) BRE guidelines and Camden Planning Guidance recommends distances of at least 18m between directly overlooking neighbouring windows. Although it is acknowledged that this is often unachievable in a central urban location, Policy DP26 still requires measures to be taken to ensure that the privacy of residential occupants is maintained. The host building would feature windows facing residential windows to the rear of properties along Kings Cross Road, Britannia Street and Wicklow Street. Although the windows include full length louvers which would limit overlooking between the buildings, it is advised that extra consideration is given to the protection of neighbouring privacy when the outdoor terraces are in use.

The terrace to the rear of 155/157 Kings Cross Road is of particular concern as it is located immediately adjacent to the rear closet wing windows of these properties. Since the initial pre-app document was submitted, revised drawings have been provided which decreased the depth of the terrace and included a green roof beyond to increase the distance between the terrace and neighbouring windows. In addition, the proposal includes the installation of a cedar privacy screen. Please note that we recommend privacy screens are a height of 1.8m. This is considered an acceptable solution, provided it is demonstrated that it would not cause harm to the amenity of the nearby residents in terms of a loss of outlook or daylight.

**Transport**

Development Policy DP18 (Paragraphs 18.12 and 18.13) requires development to provide cycle parking facilities in accordance with the minimum requirements of our cycle parking standards and in accordance with the minimum requirements of the London Plan.

9) Cycle parking provision should be provided with convenient access to street level and must be secure and easy for everyone to use. In order to meet London Plan's minimum cycle parking requirement, the development must provide 1 long stay space per 90sqm and 1

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**MWA Response:**  
7) Collaboration with Malcolm Hollis from the early stages of design ensured that there will be no discernable loss. Furthermore working closely with the neighbouring residents through a series of public consultation have also ensured that there will be no adverse impact with regards to the daylight and sunlight enjoyed by the residents.

Following Camdens advice in December 2016. The massing has been reduced and the impacts have been tested highlighting a large improvement.

Refer to Daylight/Sunlight report by Malcolm Hollis

8) Following Camdens post-submission advice in December 2016, the terrace area to the rear 155/157 Kings Cross Road have been omitted.

9) See Section 21.0 Cycle Storage Provision & Refuse Strategy of this document. Refer to Transport Statement by Motion for further information.

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short stay space per 500sqm. Therefore 10 long stay spaces and 2 short stay spaces would be required.

The submitted drawings show 16 cycle parking spaces which benefit from step free access, close to the main entrance. This which would be acceptable, provided their detailed design met Camden's parking standards (see CPG7 – Transport). The Council recommends Sheffield style stands or Josta two-tier cycle parking as opposed to vertical parking systems which are not easily accessible.

**4. Refuse collection/bin store**

All new developments are required to provide adequate facilities for recycling and the storage and disposal of waste in accordance with Core Strategy policy CS18 and CPG1.

CPG1 advises that when planning for waste recycling and storage, developments should ensure they accommodate:

- adequate space (designed) for the storage of recyclables and waste;
- safe location - accessible for all users and collectors and minimise nuisance to occupiers and neighbours (and their amenity space) e.g. noise, obstruction, odours, pests, etc.;
- recycling and refuse collection for any waste contractor (and allow for reasonable changes to collection services in the future);
- containers should have designated storage areas; and
- sensitively designed/located, especially in conservation areas/or listed buildings.

Occupiers of commercial premises are legally obliged to make an arrangement with either the Council or a licensed waste carrier for the collection of the waste produced from the premises.

The volume of waste generated and thus the number and type of containers that a commercial development requires is ultimately dependent on the use of the building. Further information can be found on the Council's website: <http://camden.gov.uk/ccm/content/environment/waste-and-recycling/commercial-waste/duty-of-care.en>

10) External storage must be provided in most cases. As a guide, approximately one cubic metre storage space is required for every 300-500sqm of commercial space (includes both recyclable and non-recyclable waste). Storage space must be designed to accommodate bins to hold this amount of waste, separated, and should be designed in consultation with the waste collection contractor.

A dedicated refuse store is shown on the basement floor for 8 wheele bins, accessed via DDA lift. The Council's Environmental Health Officer has assessed the proposals and although the storage area in the basement looks acceptable, the following concerns were raised:

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**MWA Response:**  
10) Refer to Section 21.0 Cycle Storage Provision & Refuse Strategy of this document.

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- The lift does not look very big so could be time consuming moving the bins.
- What happens if the lift breaks down – what would the alternative arrangements be?
- Will it be acceptable to have bins pulled through the reception area?
- Will there be personnel who will present and return bins before and after collection?

These issues would need to be addressed in any future planning application. It may be worthwhile including a separate lift for the movement of waste. A statement providing further details regarding the waste collection strategy would also need to be provided.

**Basement**

The development includes the excavation of a single storey basement extension. It would have a footprint of approximately 315.7sqm and the pre-application drawings suggest it would measure approximately 4.5m deep.

Policy DP27 (Basements and Lightwells) provides guidance on basement proposals and states that:

- a basement development that does not extend beyond the footprint of the original building and is no deeper than one full storey below ground level (approximately 3 metres in depth) is often the most appropriate way to extend a building below ground;
- sufficient margins should be left between the site boundaries and any basement construction to sustain growth of vegetation and trees (paragraph 27.9).

Camden Planning Guidance CPG4 also provides detailed guidance on basements and lightwells.

In determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity, and does not result in flooding or ground instability.

11) Given the site's location in an area with a number of underground development constraints (local flood risk zone, groundwater flow, and slope stability), you are advised to submit a comprehensive and accurate Basement Impact Assessment demonstrating no significant harm to the application site, neighbouring sites or those surrounding.

The BIA will include the following stages:

- Stage 1 - Screening;
- Stage 2 - Scoping;
- Stage 3 - Site investigation and study;
- Stage 4 - Impact assessment; and
- Stage 5 - Review and decision making.

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**MWA Response:**  
11) Refer to enclosed Basement Impact Assessment by Parmabrook and GEA



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Further detail on BIAs can be found in Camden Planning Guidance 2013 (CPG4 Basements). At each stage in the process the person(s) undertaking the BIA process should hold qualifications relevant to the matters being considered. The Council will only accept the qualifications set out in paragraph 2.11 of CPG4.

Independent verification of Basement Impact Assessments, funded by the applicant, is now also required (since CPG4 was updated in September 2013) in the following situations:

- Where a scheme requires applicants to proceed beyond the Screening stage of the Basement Impact Assessment (i.e. where a matter of concern has been identified which requires the preparation of a full Basement Impact Assessment);
- Where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow; or
- For any other basement applications where the Council feels that independent verification would be appropriate (e.g. where conflicting evidence is provided in response to a proposal).

A full scoping study is required as part of any application, identifying the potential impacts for each of the matters of concern.

Please note that the Council's preferred provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charge a fixed fee dependant on the category of basement audit, outlined in [appendix A](#) of Camden's BIA audit service terms of reference.

12) It is likely that the BIA will need to proceed beyond the scoping stage due to the underground development constraints identified previously and because the application site is surrounded by a number of listed buildings. The proposed basement would be within the existing footprint which is considered the most appropriate in this situation, particularly as the site is closely bordered by a number of Listed Buildings. The basement would be fairly deep at 4.5m, and the Council would therefore need to be satisfied that the excavation would maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and runoff or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area.

Construction Management Plan

It is important that effective measures are taken during demolition and construction works to ensure that damage is not caused to the host building, neighbouring buildings or the surrounding highways.

The Council will generally require a construction management plan for basement developments to manage and mitigate the greater construction impacts of these schemes. Construction management plans will be required for schemes on constrained sites, in conservation areas, on sites adjacent to a listed building, or in other areas depending on the scale of the development and the conditions of the site.

The main highways issue in this case is the potential impact of construction / delivery

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limited access to the site. A draft Construction Management Plan (CMP) would be required to be submitted with any application setting out how construction matters would be dealt with, for example deliveries, how material will be stored and construction waste removed from site etc.

13) A draft (based on the Camden pro-forma found online) should be submitted with the application, with the full CMP to be secured via S106 legal agreement. Chapter 4 of CPG4 (Basements and lightwells) provides more information.

It should be noted that in February 2016, Camden's Cabinet agreed to the introduction of a £60/hour formal charge to support the review and approval of submitted draft Construction Management Plans (CMPs) and verification of the operation of approved CMPs, to be secured as part of Section 106 agreements. The £60 hourly rate will allow the Council to set charges that address the specific impacts and issues of each development scheme.

However, indicative standard charges per development type are set out below to provide an indication of the levels of charges that can be expected:

Construction/ Demolition Management Plans: Implementation Support Contribution: indicative charging rates	
Small/ less complex (0-10 homes/ 0-1999sqm other uses)	£1,140
Medium size and complexity (10-50 homes, 2000-4999sqm other uses)	£3,240
Major and complex applications (50-499 homes/ 5,000-9,999sqm other uses)**	£7,620

The CMP Implementation Support Contribution will be used to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with and ensure that the planning objectives we are seeking to secure are actually achieved.

Lightwells

14) CPG7 provides detailed design guidance regarding the excavation of lightwells. However, the guidance isn't necessarily relevant in this instance due to the nature of the application site. The proposal includes two lightwells serving the basement floor. They are likely to be acceptable in this location provided they do not raise issues in terms of overlooking or light overspill, particularly the lightwell to the rear of 3 Britannia Street.

16. Sustainability

15) Developments involving 500sqm or more increase in gross internal floor area (GIA) are required to submit an energy and sustainability statement. The energy statement must demonstrate how carbon dioxide emissions will be reduced in line with the energy hierarchy (Be Lean, Be Clean, Be Green). The statement should address sustainable development principles, including how these principles have contributed to reductions in carbon dioxide emissions (more advice is provided at paragraphs 2.6 to 2.10 of CPG3 (Sustainability)), including what to include in your energy statement.

Currently, the Council expects a 35% reduction in carbon dioxide emissions below Part L

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a financial contribution to secure delivery of carbon dioxide savings in the borough. The contribution is £2,700 per tonne (over 30 years).

The sustainability statement must demonstrate how the development mitigates against the causes of climate change and adapts to climate change (please see chapter 9 of CPG3), and the development will need to be designed in line with BREEAM. Policy DP22 (Promoting sustainable design and construction) encourages development to achieve the minimum rating of 'excellent' and the following minimum standards: energy 60%, water 60%, and materials 40%.

The Council will also require a site-specific flood risk assessment with applications for basements on streets identified as being at risk from surface water flooding, unless it can be demonstrated that the scale of the scheme is such that there is no, or minimal, impact on drainage conditions.

17. Planning obligations

Highways contributions

It is likely that highways contributions will be required to be secured via S106, to cover the cost of any public highways repairs necessary as a consequence of the proposed works.

18. CIL

This proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as the additional floorspace exceeds 100sqm or one unit of residential accommodation. The current rates are £500/sqm for Camden CIL, and £50/sqm for Mayoral CIL. This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

19. Conclusion

16) Provided thorough and robust justification is provided as to why residential use would not be practical on site, and it is demonstrated that there would be no harm to neighbouring amenity, it is likely that the application would be supported at application stage.

20. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – full planning and demolition in a conservation area
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red.

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- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Demolition drawings at a scale of 1:50 showing the location and extent of demolition work
- Design and access statement
- Basement Impact Assessment
- Construction Management Plan Pro Forma
- Daylight and Sunlight Assessment
- Energy and sustainability statement
- Noise impact assessment (if the proposal includes external air conditioning units or plant)
- Waste storage and collection statement
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by letter, put up a notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined by Development Control Committee as it would be a minor development that would result in the creation of more than 500 sqm of non-residential floorspace.

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Laura Hazelton on 0207 974 1017.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Laura Hazelton

Planning Officer  
Planning Solutions Team

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MWA Response:

12) Refer to enclosed Basement Impact Assessment by Parmabrook and GEA

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MWA Response:

13) Refer to enclosed Construction Management Plan by Motion

14) The proposal now consists of only a single lightwell.

To address concerns regarding overlooking and light spill, the design now incorporates orientated slot windows. Refer to Proposed Drawings.

15) Refer to enclosed Sustainability Statement by Cundall.

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MWA Response:

16) Noted. Refer to Bidwells planning statement with regards to the residential justification.

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## WELCOME



**WELCOME TO OUR EXHIBITION WHICH SETS OUT OUR PLANS TO REDEVELOP THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD, IN CAMDEN.**

The exhibition aims to provide you with the opportunity to view the proposals, ask any questions you may have about the scheme and make comments.

Subject to the feedback received at this exhibition and from the programme of meetings with local stakeholders, we hope to submit a planning application for the site later this year.

Working with Marek Wojciechowski Architects, Balcap Re Ltd is proposing the demolition and redevelopment of the existing warehouse building at the rear of 159-163 King's Cross Road to bring forward a high quality mixed use development consisting of office and gallery space, which complements the existing characteristics of the area.

PROPOSALS FOR THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD Balcap Re

## THE TEAM



**BALCAP RE LTD**  
Balcap Re Ltd is a London based developer and is the owner of the site. They are committed to bringing forward a high quality mixed-use commercial development.

**MAREK WOJCIECHOWSKI ARCHITECTS**  
Since 2005 Marek Wojciechowski Architects have been chosen by the pursuit of quality. They believe that new buildings and architectural interventions are only sustainable if they are embedded in thorough rational analysis of function, context, materiality, and environmental impact. The complete consensus to engage and further its strong reputation for delivering new build architecture and saving historic sustainable life to old and historic buildings through relative innovative interventions.

**CONSULTANTS**  
Building Control - Assent  
Construction management and Transport - Matton  
Change and sunlight analysis - Malcolm Hollis  
Noise survey - KP Acoustics  
Archaeological report - UCL  
Services engineer and sustainability - Camball  
Structural engineer - Parmastbrook  
Site investigation - GEA

PROPOSALS FOR THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD Balcap Re

## THE SITE




The site falls within the King's Cross Conservation Area and is located to the east of King's Cross station, St Pancras International and King's Cross St Pancras underground stations. These stations offer good connections to the underground, national and international rail services. A number of bus routes also run along King's Cross Road close to the site entrance.

The existing building on site is a typical 19th century warehouse and was used for the manufacturing of mirrors, but is used solely for storage at present. The building is in poor condition and is not suitable for modern commercial use. There are no public views of the existing building from street level due to its location within a laneway site, and the King's Cross St Pancras Conservation Area Statement does not describe it as making a positive contribution to the conservation area.

Although the property itself is not listed, there are nearby Grade II listed buildings at Nos. 149-154 Wickham Street and Nos. 1-18 Britania Street.

PROPOSALS FOR THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD Balcap Re

## PLANNING HISTORY



The site has been subject to a number of planning applications since the early 1990s.

In 2009 an application was granted for the conversion of the existing light industrial warehouse building, including redevelopment to provide two flexible office units at ground and first floor levels. The application also included one self-contained residential unit on the second floor of the building.

In 2012 a planning application was submitted to renew the 2009 consent, which was subsequently withdrawn. We have carefully reviewed the consented scheme when designing our proposals for the site. Overall our design is similar in both scale and massing to the previously approved scheme.

PROPOSALS FOR THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD Balcap Re

## DESIGN CONCEPT


Key factors have been considered when developing the design concept for the site:

- Respecting and complementing the site's history and context
- Contributing positively to the Conservation Area setting and adjacent listed buildings
- Protecting the amenity of the building's neighbours, including sunlight/daylight and privacy
- Providing opportunities for a flexible reuse of office terraces and gallery space

**SCALE**  
The proposed building height has been reviewed in relation to the local context:

- The overall height of the proposed building is three storeys.
- The top storey is set back and will not be visible from the surrounding streets.
- The massing has been carefully designed to help to protect neighbours' amenity.
- The diagrams to the right show that the height and mass of the proposed scheme is comparable to the consented scheme.

**FACADE AND BUILDING MATERIALS**  
A material palette representative of the Conservation Area is proposed. The building is predominantly brick, but stone cladding and glazed areas are also proposed to reference the site's former light-industrial character.



PROPOSALS FOR THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD Balcap Re

## OUR PROPOSALS



The current proposals include:

- Demolition of the existing warehouse building to the rear of 159-163 King's Cross Road.
- Retention of the existing doors on Britania Street, helping to preserve the heritage aspects on the site.
- 654 sqm NIA high quality modern office space at ground, first and second floor levels.
- Office space suitable for small to medium size businesses.
- A gallery/hibern space of 765 sqm NIA at lower ground level.
- A series of planted terraces with associated screening to protect surrounding residential amenity.
- Landscaping and hot zones on flat roofed areas to improve the biodiversity of the site.
- 16 secure cycle spaces for building users, in line with Camden Council's parking standards.
- A car-free development.

PROPOSALS FOR THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD Balcap Re

## RESPECTING OUR NEIGHBOURS



- A daylight, sunlight assessment will be submitted alongside the planning application, which will be publicly available to view.
- The scheme has been designed with BRE (Building Research Establishment) Guidelines in mind.
- Proposed windows facing neighbouring properties will include full length screens to screen and prevent overlooking between buildings.
- Privacy screens, fixed planting and greening are also proposed.
- Extra consideration to protect neighbour privacy will be taken when outdoor terraces are in use.

**ACCESS AND SERVICING**  
Pedestrian access to the building will be from Britania Road, through the retained and restored heritage doors. Refuse will continue to be collected via street, with dedicated secure storage within the building. A management strategy will take the waste out on a suit in time basis.



PROPOSALS FOR THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD Balcap Re

## SCHEME BENEFITS



- Replacing an unattractive run-down building with new high quality architectural design that is sympathetic to the existing character of the area.
- Taking an unsecured site, which has been subject to break-ins, and providing 24-hour security and a concierge.
- High quality flexible office and gallery spaces suitable for small to medium sized businesses.
- A scheme that will provide new jobs and investment to the local area.
- Enhancing King's Cross St Pancras Conservation Area and neighbouring listed buildings.
- A highly sustainable building targeting BREEAM Outstanding.

PROPOSALS FOR THE LAND TO THE REAR OF 159-163 KING'S CROSS ROAD Balcap Re



## 15.0 PUBLIC CONSULTATION & DESIGN TEAM RESPONSE

### 15.1 Land to the rear of 159-163 King's Cross Road: Exhibition Report

#### 15.2 Exhibition Overview

Two exhibitions were held on the 15th & 18th October to present the proposals for the land to the rear of 159-163 King's Cross Road; a public exhibition for the local community in the wider area, and a drop-in event for neighbours in the immediate vicinity facing onto the site.

Both events had attendees from Balcap Re Ltd, MWA, Bidwells and Public Relations company. The majority of exhibition attendees were local residents from the surrounding area, along with some representatives from local businesses. The purpose of the events was to provide neighbours with the opportunity to learn more about the proposals, and share feedback with the project team.

The format of both events involved the display of boards (highlighted on the adjacent page) which contained information about the site, the proposals and the project team. Feedback forms were present to capture responses, and the project team were on hand to answer any questions attendees had.

The public exhibition occurred on Saturday 15th October at the King's Cross Neighbourhood Centre, 51 Argyle Street, WC1H 8EF. This was advertised through the distribution of a newsletter to around 1,500 properties in the area, including residents, local groups and local businesses.

Around 7 residents attended on the 15th October. This was a constructive meeting, with some attendees raising concerns about the accessible roof garden and screening, and others expressing a preference for a lighter stock of brick.

A second drop-in event was held at the Derby Lodge Tenants and Residents Association (TRA) hall on Tuesday 18th October. This was organised following discussions with members of the TRA, and aimed specifically at residents living in the buildings immediately around the site. Invitations were delivered by Royal Mail and by hand to 110 properties. Around 21 residents attended this meeting.

Verbal feedback at this event identified two key concerns: residents wanted to know more about the impact the development would have on sunlight reaching their windows, and were keen that any construction would cause minimum disruption. There was a general feeling that the current structure was not serving any useful function and visually detracted from the area. Residents also raised concerns about the colour of the brick, with some expressing a preference for a lighter stock colour. Some attendees were keen to know if some landscaping or greenery could be provided to the rear of the Derby Lodge properties as a result of the development.

#### 15.3 Written Feedback

A number of comments have also been recorded from the written feedback on the questionnaires. Some verbatim examples of the feedback can be found below, which outline the key issues residents felt needed to be addressed:

- *The major issue is the blockage of light on the side of the Wicklow St building.*
- *We are happy with the look of the building, but it is the height we have issue with. Why can you not keep it at the original height or only add one floor?*
- *Worried I'll get no natural light. Noise will impact my right to quiet life.*
- *Increase in height will steal light.*
- *We are strongly concerned about the loading bay. Although you say it will be happening inside the building, we feel very worried about having trucks entering the new building from in front of our main entrance. This will be noisy and polluting.*

#### 15.4 Conclusion

Overall, the feedback received from exhibition attendees was broadly positive, but with constructive input. Notably, there was a strong agreement (just under 70% of feedback form responses) that more office space and jobs associated with the scheme was a welcome addition to the area. Surprisingly, there was a high level of neutral feeling (about 45% of feedback form responses) about the retention of timber doors.

The levels of neutral responses may be an indication of a commonly stated verbal feedback from the events: many attendees were keen to learn more about how their amenity would be protected during the project. Notably this was around light, views (stemming from the height of the proposed structure), and potential disruption during the construction phase. Refer to Four Communications Statement of Community involvement for further information.

#### 15.5 Design Proposal Amendments

Following the results of the two consultation events, some design alterations to the scheme were made in coordination with the public input.

- A reduction in the extent of the proposed basement outline.
- The removal of Northwest facing front lightwell, as it is no longer within the basement outline perimeter.
- The removal of Southeast facing second floor terrace, in order to bring down the proposed building massing and allow for further daylight to reach Derby Lodge properties.
- A lighter brick material palette to the whole building, as well as lighter coloured louvers to the Southeast rear elevation, as means to reflect the neighbouring residents desire for a lighter building massing.

