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| Address: | 15-27 Britannia Street London WC1X 9JP | |
| Application Number: | 2012/3082/P | Officer: Charles Thuaire |
| Ward: | Kings Cross | |
| Date Received: | 13/06/2012 | |
| Proposal: Redevelopment of site (involving the retention of facades facing Britannia St and Wicklow St, retention of eastern blocks adjoining railway line, demolition of remainder of site, alterations and extensions, and change of use from offices (Class B1)) and erection of a mixture of 5 - 6 storey high blocks to provide Sui Generis student accommodation (226 bedrooms) with associated performance space / gallery, communal areas and an external courtyard and 2 roof terraces; two Class C3 studio flats facing Wicklow Street; and one Class B1 office unit in basement. | | |
| Drawing Numbers: (00) 001A, 002A, 003A, 004A, 005A, 006A, 007A, 101A, 102A; (20) 000B, 001C (accessible rooms plan), 001C (proposed ground floor plan), 002B, 003D, 004D, 005C, 006C, 007E, 008B, 100D, 101C, 104A, 102A, 103A, 200B, 201C; (25) 000B; Design and Access Statement by Carey Jones; Construction Management Plan by Watkin Jones; Ecological Assessment by Greengage; Energy Statement by GDM; Noise and Vibration Assessment by PDA; Phase One Preliminary Risk Assessment by Tier Consult; Service Management Plan by ADL Transport; Student Management Plan by Fresh Student Living; Sustainability Statement and BREEAM Pre-assessment by Icen; Transport Statement by ADL Transport; Travel Plan by ADL Transport. | | |
| RECOMMENDATION SUMMARY: grant permission subject to S106 | | |
| Related Application Date of Application: | 13/06/2012 | |
| Application Number: | 2012/3084/C | |
| Proposal: Partial demolition of existing buildings (involving the retention of facades facing Britannia St and Wicklow St, and retention of eastern blocks adjoining railway line) | | |
| Drawing Numbers: (00) 001A, 002A, 003A, 004A, 005A, 006A, 007A, 101A, 102A; (20) 102A, 103A. | | |
| RECOMMENDATION SUMMARY: grant consent subject to S106 | | |
| Applicant: | Agent: | |
| University and College Union c/o Watkin Jones Group | Watkin Jones Group Unit 2 Wellfield Business Park Chester Road Preston Brook Cheshire WA7 3FR | |

ANALYSIS INFORMATION

| Land Use Details: | | | |
|-------------------|-----------|-----------------|------------|
| | Use Class | Use Description | Floorspace |
| | | | |

| | | |
|----------|---|---|
| Existing | <i>B1a office</i> | <i>4796m²</i> |
| Proposed | <i>B1a office Sui Generis student hostel ancillary Assembly and Leisure C3 Dwelling House</i> | <i>588m² 7674 290 80 total= 8632</i> |

Residential Use Details:

| | Residential Type | No. of Habitable Rooms per Unit | | | | | | | | |
|----------|------------------|---------------------------------|---|---|---|---|---|---|---|----|
| | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9+ |
| Proposed | <i>Flat</i> | 2 | | | | | | | | |

Parking Details:

| | Parking Spaces (General) | Parking Spaces (Disabled) |
|----------|--------------------------|---------------------------|
| Existing | <i>0</i> | <i>0</i> |
| Proposed | <i>0</i> | <i>0</i> |

OFFICERS' REPORT

This application is being reported to the Committee as it entails a Major development of more than 1000 sqm of non-residential floorspace (Clause 3i) and demolition of a building in a conservation area (Clause 3v).

1. SITE

- 1.1 The site is an island one bounded by Britannia Street to the north, Wicklow St to the west and south and the London Underground railway lines to the east. It comprises a vacant office block recently occupied by University College Union as their headquarters with offices and conference facilities, who relocated in 2009 to more modern offices in Camden.
- 1.2 The buildings date from the 19th century and were originally developed in stages as a brewery depot and offices arranged around a central courtyard. They are part 2 part 3 storeys high with a variety of heights, facade designs and roof forms, but essentially share a common design idiom of a substantial 19th industrial block with brick walls, traditional window and arch openings and a footprint extended to the full site perimeter flush with the pavement. Some of the later postwar extensions are somewhat crude and detract from the overall quality of the block. The bevelled corner with attractive entrance door at the junction of Britannia and Wicklow Streets is distinctive and forms a focal feature in views eastwards. The main buildings are set back at upper levels from the railway line, with lower ancillary blocks immediately adjoining it on both road frontages. There is a small basement at the western corner.
- 1.3 Surrounding properties include- a 5 storey postwar office block and a converted 19thC stable block in office use on the north side of Britannia Street; large 20th C blocks extending to 7 storeys high in institutional use by the Royal E.N.T. Hospital on the south and west sides of Wicklow St; a 3-4 storey Grade 2 listed building in institutional use on the western corner of the road junction, and a mixed office/residential block opposite this. A carpark is on the east side of the railway line and further east are Grade 2 listed 6 storey blocks of flats such as Derby Lodge which spans both Britannia and Wicklow Streets.
- 1.4 The property and its surroundings are located in the Kings Cross conservation area; the buildings on the application site, as well as those at 28-32 Britannia St to the north and the ENT Hospital to the south, are considered to make a positive contribution to its character and appearance. The Wicklow St block in particular, in conjunction with the hospital opposite, contributes to the industrial canyon-like character of the streetscape here.

2. THE PROPOSAL

Original

- 2.1 Redevelopment of site (involving the retention of facades facing Britannia St and Wicklow St, retention of eastern blocks adjoining railway line, demolition of remainder of site, alterations and extensions, and change of use from offices (Class B1)) and erection of a mixture of 5 - 6 storey high blocks to provide student

accommodation (226 bedrooms) with associated performance space / gallery, communal areas and an external courtyard; two studio flats facing Wicklow Street; and one Class B1 office unit in basement.

Revisions

- 2.2 Introduction of 2 communal roof terraces for students at 5th floor on Wicklow St; amendments to room layouts to comply with lifetime homes and wheelchair accessibility standards; amendments to window layouts of 5th floor to improve daylight.

3. **RELEVANT HISTORY**

- 3.1 April 2011- applications submitted refs 2011/2179/P and 2182/C for redevelopment of site (involving the retention of facade facing corner of Britannia St and Wicklow St, retention of eastern blocks adjoining railway line, demolition of remainder of site, alterations and extensions, and change of use from offices (Class B1)) and erection of a mixture of basement and 5 - 8 storey high blocks to provide student accommodation (263 bedrooms) with associated performance space / gallery, communal areas and an external courtyard; four residential flats (2 x 1-bed and 2 x 2-bed), and one Class B1 office unit.
The applications were later withdrawn in July 2011, following officer concerns at loss of building in CA, inappropriate design, bulk and height of replacement building, inadequate standards of amenity to student accommodation.

4. **CONSULTATIONS**

Statutory Consultees

- 4.1 English Heritage- comment that 'the latest proposals have been drawn up with the benefit of pre-application discussion with the applicants and Camden officers. The proposals have developed to better reflect the historic and architectural character of the conservation area and to balance, in our view, the less than substantial harm to the existing buildings with the wider benefits of bringing the site back into sustainable and positive use. As such we are content for the proposal to be determined on the basis of local and national policies and guidance from your specialist conservation team, subject to the following assurances. The integration of the new elements of the development with the retained historic elements means that the quality of workmanship and facing materials need to be of comparative quality and blend well with the existing palette of materials. In the event of you being minded to grant approval for the scheme, we would therefore encourage you to ensure that conditions are imposed which ensure that the quality of workmanship and materials are of high quality and sustain and enhance the character and significance of the existing buildings and wider conservation area'.

Conservation Area Advisory Committee

- 4.2 Kings Cross CAAC- object- 'we remain implacably opposed to this oppressive over-development that would seriously detract from this part of the conservation area'.

Other bodies

- 4.3 London Underground Ltd comment- no objection in principle but need to ensure stability and loading of adjoining underground tunnels and infrastructure to be

safeguarded to their engineers' satisfaction and therefore require various conditions to be imposed.

4.4 Crossrail comment- no objection

4.5 Thames Water- request informatives to be added regarding surface water drainage, piling, sewers and water infrastructure.

Adjoining Occupiers

| | Original |
|-------------------------------------|-----------------|
| <i>Number of Letters Sent</i> | 107 |
| <i>Number of responses Received</i> | 09 |
| <i>Number in Support</i> | 00 |
| <i>Number of Objections</i> | 09 |

Plus site notice and press advert

- 4.1 Neighbours from Derby Lodge, 28-32, 46 & 50 Britannia St; Acton St object –
- very crowded and dense residential area which already has high density of hotel, hostel and student accommodation; development of this size with more students and performance space will increase congestion, noise, traffic, parking and disturbance from transient students and impact on infrastructure;
 - noise nuisance from construction, performance space, courtyard and students; temporary disruption from construction activity and traffic;
 - area already suffers from noise from bars and parking from galleries, so performance space will further impact on residents; need to be strict controls on licensing of performance space;
 - development will increase perception that area is for transient population whereas we need more residential accommodation which will improve nature of area and create more settled community; numerous students already in Kings Cross area as well as hotels, thus question if area needs more temporary accommodation and would prefer permanent residents;
 - student block needs to be car-free;
 - already have problems from Smithy's and Water Rats bars which police and Camden deal with, so do not need a new student village and want to live in peace;
 - 5-6 storey high blocks not in keeping with conservation area and too high density;
 - sustainability credentials need to be maximised and water consumption, waste and heating need to be provided in most efficient way;
 - provision of cycle and refuse store for over 200 students is inappropriate opposite prestigious offices of 28-32 Britannia St and should be relocated to Wicklow St;
 - loss of light and privacy to neighbour in Derby Lodge;
 - loss of carpark (*officer note- development does not relate to this carpark which is on east side of railway line*);
 - managed cycle lane or allowing contraflow cycling in one-way streets is essential to maintain cycle safety;

5. POLICIES

Set out below are the LDF policies that the proposals have primarily been assessed

against. However it should be noted that recommendations are based on assessment of the proposals against the development plan taken as a whole together with other material considerations.

5.1 **LDF Core Strategy and Development Policies**

CS1 - Distribution of growth
CS5 - Managing the impact of growth and development
CS6 - Providing quality homes
CS8 - Promoting a successful and inclusive Camden economy
CS10 - Supporting community facilities
CS11 - Promoting sustainable and efficient travel
CS13 - Tackling climate change
CS14 - Promoting high quality places and conserving our heritage
CS15 - Protecting and improving open spaces & encouraging biodiversity
CS16 - Improving Camden's health and well-being
CS17 - Making Camden a safer place
CS18 - Dealing with waste
CS19 - Delivering and monitoring the Core Strategy

DP1 - Mixed use development
DP2 - Making full use of Camden's capacity for housing
DP3 - Contributions to supply of affordable housing
DP5 - Housing size mix
DP6 - Lifetime homes and wheelchair homes
DP9 - Student housing
DP13 - Employment sites and premises
DP17 - Walking, cycling and public transport
DP18 - Parking standards and the availability of car parking
DP19 - Managing the impact of parking
DP20 - Movement of goods and materials
DP21 - Development connecting to highway network
DP22 - Sustainable design and construction
DP23 - Water
DP24 - Securing high quality design
DP25 - Conserving Camden's heritage
DP26 - Managing the impact of development on occupiers and neighbours
DP28 - Noise and vibration
DP29 - Improving access
DP31 - Provision of and improvements to public open space

Supplementary Planning Policies

5.2 Camden Planning Guidance
Kings Cross Conservation Area Statement

Other policies

5.3 National Planning Policy Framework (27.3.12)
The London Plan (July 2011)

6. ASSESSMENT

- 6.1 The principal considerations material to the determination of this application are summarised as follows: demolition of building in conservation area; bulk and design of new building and impact on conservation area; new landuses including issue of 'studentification'; compliance with standards of new accommodation; impact on neighbour amenities and transport conditions.

Proposal

- 6.2 The scheme entails demolition of most buildings on site, except the 1 and 3 storey buildings adjoining the railway line and the lower floor facades of the main buildings on both Britannia St and Wicklow St frontages and the whole bevelled corner feature element at the road junction. The scheme infills the centre of the site and extends it upwards by 2-3 storeys in a variety of forms to produce an articulated composition.
- 6.3 The main block (ie. excluding the 1-3 storey buildings adjoining the railway line on the east side) will thus be 4-5 storeys high on Britannia St and 5-6 storeys high on Wicklow St and will retain the 3 storey corner entrance feature.
- 6.4 The scheme will provide student accommodation in the form of 226 ensuite bedrooms (comprising 81 self-contained studio flats and 145 cluster flat bedrooms with shared lounge/kitchens) plus ancillary reception area, management office, common room and TV lounge, cycle and refuse store, laundrette, plant and substation etc at ground levels. A Class B1a office for the applicant, to be used for managing their other London hostels, is located in the existing basement floor and access via the building or courtyard. The block is arranged around a central courtyard with internal entrances from the corner tower and from Britannia St. As revised, additional roof terraces for students are provided at 5th floor level facing Wicklow St.
- 6.5 The 3 storey building on Britannia St will accommodate student studios plus refuse store as part of the main complex described above. The 3 storey building on Wicklow St will have 2 Class C3 one person studio flats and cycle storage at ground floor. The single storey hall adjoining the railway on Wicklow St will have a performance space/gallery area, which will be ancillary to the student hostel and also used by the University.
- 6.6 The student hostel will serve the students at University of the Arts at their new Kings Cross campus, following a requirement for additional bedspaces located close to their new campus and the need for such accommodation to include a performance space. The University has confirmed that the accommodation at this site is required for their students. It will be managed by Fresh Student Living who also operate other student hostels around London.
- 6.7 An earlier scheme by the applicant last year followed a previous series of pre-application meetings and proposed a more comprehensive redevelopment of the site with separated and higher blocks with mansard roofs and a traditional design. The application was withdrawn following objections by officers of both English Heritage and Camden on grounds that the scheme involved loss of a positive

contributor building in a conservation area without justification, a replacement building that was inappropriate in terms of bulk, height and design, and student accommodation which had very poor levels of amenity in terms of internal daylight and sunlight.

- 6.8 Subsequently several meetings have been held with relevant officers to establish a way forward and review the design evolution before resubmitting a new application. Basically the scheme is now at least 2 storeys lower than before, it retains the most important facade elements and buildings in terms of townscape value, and its design adopts a more conservationist approach with a greater variation of fenestration and roof patterns. The internal layout of the student hostel has been rearranged to maximise the opportunities for bedrooms and flats receiving light and outlook and the communal and ancillary uses are now all located at lower floors facing the central courtyard. Viability reports have been submitted to justify the loss of the building and office use here and the quantum of development here.

Landuse

- 6.9 The applicants have explored alternative options for reusing the existing complex of buildings. The offices are in poor condition and have an inefficient and complicated layout on several levels which has been extended and adapted over time by different occupiers. The buildings are not suited for modern office operators and do not comply with current access and servicing requirements, which is why the previous occupiers (UCU) moved out. A marketing study has been submitted which demonstrates that the offices have been marketed since 2008 with no interest expressed by any businesses wanting to occupy it and with the only interest shown by developers seeking to redevelop the site for non-B1 purposes. It is also considered unviable to upgrade and refurbish the building for modern office purposes and meet the requirements of future tenants and legislation. It is therefore considered that the retention of the existing building would be uneconomic and result in long term dereliction, and thus a redevelopment is the preferred option.
- 6.10 Furthermore it is considered that the site is not suitable for continued B1 use here. The loss of employment use here has been tested against the criteria of policy DP13. It has been shown that, although it results in the loss of over 4500 sqm GIA of office space, this site has remained empty for over 3 years and has had no interest by any business class operator for either reuse or redevelopment given the oversupply of existing office accommodation in the local area.
- 6.11 An analysis has also been undertaken of the suitability of this site for alternative uses such as residential. The existing buildings again are unsuitable for conversion to housing. The conservation-led approach of the proposed redevelopment, the need to provide street frontage buildings as well as the narrow shape of the site all limit the possibility of an alternative layout more suited to residential accommodation and of a wider range of new residential units within a redevelopment scheme here. However it is recognised that the separate buildings adjoining the railway line can be converted to new units and indeed the proposal does provide flats in one of these buildings. It has been demonstrated by the architects that the proposed scheme could in future be adapted to provide 1-2 bedroom units but no large family sized units and there is no possibility of private amenity space except at roof level. Furthermore the daylight and amenity levels for

new units at lower floors would be very poor as standards for private housing are more stringent than those for student bedrooms and transient uses. The applicants also argue that the area is predominantly commercial in character and isolated for residential accommodation, although it should be noted that there are blocks of flats nearby. It is therefore concluded that the site is not suitable for Class C3 residential accommodation and that furthermore the use of such a site for students would release the pressure on other conventional housing in the borough which would otherwise have to be used for student flats and bedsits.

Student housing

- 6.12 The scheme has been tested against the 10 criteria of policy DP9 regarding new student housing and is considered to meet all of them. It does not involve the loss of self-contained homes, it will not affect the Council's ability to meet its targets for self-contained homes including affordable housing, and the site does not have any permission for housing nor a site allocation for this in the LDF, nor is it considered particularly suitable for such uses. The new student accommodation will comply with all relevant standards in terms of space and facilities, and indeed the rooms exceed the space standards of other similar schemes elsewhere. The site is easily accessible to public transport, shops and services. The student hall will be connected to the University of Arts at Kings Cross and is sited very close to its campus; it is proposed that this relationship will be secured by a S106 clause. It should be emphasised that there is a clear requirement for all this accommodation by the University which includes not only the student rooms but also the performance space to be used by all students. There is also a general requirement for more student housing in London to meet the needs for higher education establishments. The accommodation will provide a variety of flat layouts with both shared cluster flats and self-contained studios including 10% designed specifically for disabled students.
- 6.13 Finally it is considered that the scheme will not impact upon the balance of uses in the area and will contribute to creating a mixed and inclusive community here. Officers confirm that the Kings Cross ward does not have the highest concentration of students in the borough (Bloomsbury is higher) and the site here is some distance away from other student accommodation. Indeed there is none within a 250m radius of this site and other student blocks further away are concentrated in Islington to the east or Bloomsbury to the west and south. It is therefore considered that the site will not lead to an over-concentration of students in the area. Furthermore the scheme now only involves 226 students which falls below the threshold in CPG2 which defines 250 bedspaces as constituting a concentration. It should be noted that a recent appeal decision for 347 student bedrooms in West Hampstead considered that this much larger scheme would not lead to an imbalance between student housing and other uses in the area.
- 6.14 The existing housing is mostly to the east of the railway line or south of Swinton Street, although there are some blocks nearby. However the character of this area is different from that west of Grays Inn Rd which has more housing and also more student halls. Although the scheme will have some impact on nearby residents, it will not be in a cumulative way with others student schemes and it is unlikely that other students will enter the Britannia Street area.

- 6.15 Finally the proposal also includes other uses such as B1 offices, Class D1 ancillary performance space and Class C3 studio flats. The scheme with ground floor accesses and frontages on all sides will increase activity at street level and add vitality to the streetscene which is fundamentally commercial in nature and relatively quiet with no natural surveillance, especially along Wicklow St. The mix of uses will add to the variety of uses in the local area and assist in the creation of a mixed and balanced community here. The advantage of the proposal is also bringing the vacant site back into beneficial use with associated economic benefits for the local area. The student hall will be subject to the submitted Student Management Plan which will be secured by S106, and given that there are few residents immediately adjoining the site, it is considered that the scheme should have minimal impact on residential amenity. The S106 will also need to ensure that the student hall is operated in line with the applicant's intentions and used by students attending HEFCE-funded institutions and is not occupied in future as separate self-contained flats or other forms of Class C or Sui Generis accommodation such as HMO's or hotel.
- 6.16 In conclusion, it is considered that the scheme in terms of its scale, nature and mix of uses will not lead to 'studentification' of the area, will not harm the balance of uses or amenity of the local community and will meet an identified need for such uses in the locality. Furthermore the proposed scale and mix of uses is critical here and a lower scale of development or an alternative mix of uses would not be viable and thus would not secure the longterm future of this site with a beneficial and sustainable use.

Specific standards

- 6.17 In terms of the uses themselves, they comply with relevant standards. As revised, all student rooms will comply with relevant accessibility and lifetime home standards. 6 studios suitable for disabled students will be provided on ground floor and in addition 4 cluster flat bedrooms (one on each floor) are now provided, as well as the possibility of 3 ground floor rooms to be converted to accessible ones in future, which accords with LDF policy DP9 which requires 10% of student rooms to be suitable for wheelchair users. Adequate communal space is provided both within individual cluster flats and communally at ground floor level. In addition performance space is provided for both residents and other University students. This is created in the existing leadworks building with its large clear space, high headroom and separate access off Wicklow St, which is considered ideal for this purpose.
- 6.18 Amenity space is provided in the courtyard and also more beneficially (in terms of quality and usefulness) at rooftop level. Conditions are however recommended to control any permanent furniture and structures as well as landscaping on the roof terraces so that they do not create harmful visual clutter in long views.
- 6.19 The studio flats created out of the existing building in Wicklow St comply as far as possible with lifetime home standards. They are 29 sqm each which is below the required minimum CPG standard of 32sqm for 1 person units. However an alternative conversion of this property is constrained by its layout and windows which cannot be altered or extended due to LUL covenant restrictions and an alternative one bedroom maisonette here would be uneconomic and not compliant

with lifetime homes. It is considered that this failure is marginal and that the studios in layout and space still provide good quality accommodation for this context. Both flats receive good quality light and outlook.

- 6.20 The offices are in an existing basement with access only through the student hall or courtyard. They are intended to serve the needs of the applicant who manage their other student hostels around London. Although the quality of accommodation is poor due to its basement situation with low light levels, it makes use of an otherwise redundant space and, in the context of its quasi-ancillary use, it is acceptable in the circumstances.

Sustainability

- 6.21 The BREEAM assessment demonstrates that the scheme will achieve a rating of Very Good in compliance with policy and will exceed all targets in the sub-categories of water, energy and materials. It will achieve a CO2 emission reduction of 40% exceeding London Plan and LDF targets. Renewable facilities are proposed in the form of air-source heat pumps on the roof of the central block at the west of the site and this will be ducted to allow connection to a district heating system at a later date.

Demolition

- 6.22 All buildings on this site are designated as positive contributors to the character of the conservation area according to the Kings Cross CAS. However the architects have identified in conjunction with officers that certain elements and buildings are more important than others; in particular the bevelled corner feature, the leadworks building alongside the railway and the 2 single plot buildings on Wicklow and Britannia Streets on the east side are worthy of retention, whereas the various later and postwar additions have no value. The proposed scheme, in addition, will retain the original facades of the lower 2 and 3 floors of the other buildings on Britannia St and Wicklow St respectively.
- 6.23 LDF policy DP25 prevents demolition of positive contributor buildings where it would result in harm to the conservation area. In this case, the partial redevelopment of the site retains the most important elements of townscape value and the new extensions and infilling is sympathetic in height and design. As discussed above in the landuse section, the existing central building in its entirety is considered to be uneconomic and impracticable to be used for other purposes such as offices or housing. The applicant also has explored options of converting the existing buildings for student housing and concludes that it can only accommodate 123 bedrooms which is financially unviable.
- 6.24 It is concluded that the demolition of various buildings and elements on this site is acceptable in the context of the overall scheme which result in 'less than substantial harm' to the conservation area and also brings back the site into active and beneficial use. This accords with para 134 of NPPF advice which states that the public benefit of a proposal accrues through the optimum viable use of the heritage asset contributing to its long-term conservation, which in this case may include the significant elements of the building, as well as the conservation area, by preserving the most significant elements of the buildings, and providing a new

building which accords with the conservation area characteristics and introduces a new viable and vibrant use.

- 6.25 This is reflected by English Heritage's opinion that the proposals now reflect the historic and architectural character of the conservation area and balance the 'less than substantial harm' to the existing buildings with the wider benefits of bringing the site back into sustainable and positive use. In developing the revised scheme, the English Heritage officer stated that its benefits were seen to be securing the optimum viable use, securing a well located and appropriate use, the removal and reinstatement of the crude extensions to the building undertaken following bomb damage, bringing life to the area, securing the longer term use of the buildings, and preventing their continued vacancy and deterioration.

Bulk/design/layout

- 6.26 The retained buildings as identified above are restored and adapted sympathetically. In particular the corner entrance element at the road junction maintains its function as an important focal feature in views westwards. The 2 narrow plot width buildings alongside the railway line also act as historical small 'bookends' to the overall scheme in views eastwards. The remaining infills in the central sections are designed in a sympathetic manner to respect the plot widths, articulated roof profiles and heights and differing elevational details of the existing buildings and surroundings. The footprint also replicates largely that of the existing buildings arranged around a courtyard.
- 6.27 The maximum heights of the new blocks behind retained facades are based on the 'datum line' height of Derby Lodge to the east on both road frontages. The additional 2 floors on the Britannia St frontage are visually separated into 2 blocks with a flat roof and a pitched roof and with different heights and fenestration types. This respects the variety of building type and form and the articulated roofline along this part of the road and adds variety to the streetscape. In particular the setback pitched roof in its setback around the corner with Wicklow St respects the primacy of the corner focal feature in long views down Britannia St. Along Wicklow St, the additional 2 floors are provided along the whole frontage but subtly divided into 2 elements to reflect the differing articulation and fenestration of lower floors. The height matches that of Derby Lodge and reflects well the higher buildings of the ENT Hospital opposite. It is considered that the height and bulk here contributes to the industrial and canyon-like character of the street here, which has once been referred to by English Heritage as 'Dickensian' in feel. In addition a simple zinc-clad roof extension is provided on the central part, well set back from the street edge, which is read as a lightweight and contemporary addition that is barely if at all visible in long views and thus does not affect the overall visual bulk of the scheme here.
- 6.28 All extensions respect and reflect the traditional detailing and fenestration patterns of lower floors and the differing treatments used serve to enrich and repeat the existing variety in elevations on all frontages. At ground floor level, original entrances are reinstated or removed as appropriate. Materials will match existing or respect the industrial character of the surroundings, such as zinc cladding and metal frames. Conditions will be imposed to ensure submission of satisfactory details of architectural features, typical façade bays and material samples.

- 6.29 It is considered that the bulk, height and scale of development here respects the differing characteristics of both streets and the height of surrounding buildings. The traditionally inspired design and materials used is sympathetic and supportive to the essential robust and industrial character of surrounding buildings. The additional height will not overdominate the existing focal corner feature on the site nor the lower listed building opposite at the junction of both roads. The treatment of this bevelled corner here with its reinstatement of historic features and the design and setback of the roof extension behind it ensures that the setting of the listed building is not harmed.
- 6.30 The quantum of development has been reduced to deal with previous officer concerns raised regarding the scale and bulk of development here and the poor level of amenity at lower floors. A viability assessment has been submitted which shows that the reduced level of student bedspaces will result in a 'break even' situation for the applicants who are committed to providing the necessary student accommodation here for the nearby University campus. As already noted above, an alternative conversion of the existing buildings would also be uneconomic. This means that the overall bulk and scale of development here is the minimum necessary for the scheme to be viable.
- 6.31 In conclusion, the overall scheme with its retained elements and new buildings is considered appropriate in scale and detailed design to the character and appearance of the conservation area and will not cause serious harm to it. The scheme complies with policy at the heart of the NPPF in that it sustains the significance of the conservation area and heritage assets within by virtue of its design which has been informed by an understanding of the significance of this part of the conservation area and its essential characteristics. Although there is some harm to heritage assets by these extensive changes, it is not substantial and mitigated by benefits of introducing a sustainable and vibrant use as discussed above.

Landscape

- 6.32 The courtyard will be hard surfaced with minimal opportunity for planting, given its size, use for access and shading. Originally proposed green roofs along Wicklow St have had to be omitted now in favour of new roof terraces to provide additional amenity for the students. However a biodiverse roof will remain on the flat roofed building in Wicklow St which is acceptable in principle and detail. The remaining roofs cannot have such features because they are either pitched, unable to accommodate the extra loading or have covenant restrictions by LUL. Nevertheless the enhancements proposed are welcomed as currently the site has very low ecological value.
- 6.33 Additional features such as bird and bat boxes and a stag beetle loggery are proposed and more details on location and design will be required by condition.

Neighbour amenity

- 6.34 A daylight and sunlight study has been submitted to analyse the impact of the scheme on neighbours as well as the acceptability of the proposed accommodation in accordance with the guidelines of the BRE report 2011.

- 6.35 The immediately surrounding buildings are all commercial, in either B1 office or D1 hospital use and there are no residential properties directly affected. The lower floors of offices at 28-32 and 34-44 Britannia St to the north and of the Hospital patient wards in Wicklow St to the south will have significantly poorer daylight using the Vertical Sky Component (VSC) analysis but overall they meet the minimum standards using the Average Daylight Factor (ADF) analysis which is more sophisticated in its measurement of daylight. It should be noted that only the ground and 1st floors are affected, that the margin of failure is low and that it is difficult to satisfy the guidelines in such a densely built up environment such as this with narrow streets and high buildings and with the need to maintain conservation area character by having new buildings on the street frontages, bearing in mind that the BRE guidelines should be interpreted flexibly as they are based on a suburban context. Furthermore the patient rooms are used as transient accommodation and cannot be compared to permanent housing.
- 6.36 Adequate sunlight is received by the south facing Britannia St properties. No unreasonable levels of overlooking would occur from the new windows or roof terraces of the scheme to properties opposite. It is concluded that the impact on neighbouring properties is acceptable in these circumstances.

Student amenity

- 6.37 The previous application was withdrawn following concerns by officers that it resulted in poor standards of daylight and sunlight to student rooms especially those on lower floors. The scheme has been revised significantly to maximise the amount of light received by habitable rooms, by removing bedrooms facing the ground floor courtyard, placing ancillary communal facilities in the central courtyard where light levels are very low, placing bedrooms predominantly onto outer street facing frontages and placing the studio rooms in the locations with highest levels of light given their more self-contained nature. In contrast, the cluster flat rooms have more flexibility as students have the option of experiencing higher levels of light or sunshine from their communal lounges/kitchens or individual bedrooms as appropriate. Furthermore, by virtue of removing 2 floors, the lower heights of the new blocks have benefitted the light levels reaching the courtyard facing rooms. Officers have analysed the new ADF results as being more meaningful than the VSC results, as the latter are notoriously difficult to achieve minimum levels in such a constrained environment as this. The results of this new study are very positive.
- 6.38 For instance the previous withdrawn scheme had 71% of cluster bedrooms and 14% of associated lounges which met minimum relevant daylight standards; in particular only 60% of the ground floor bedrooms and 50% of 1st floor ones met these minima. Also only 24% of self-contained studios met minimum daylight standards for living rooms. In terms of sunlight, only 58% of bedrooms and 67% of studios achieved minimum sunlight standards.
- 6.39 In contrast in the new scheme, it is calculated that 96% of cluster bedrooms and 29% of associated lounges meet minimum relevant daylight standards, with now 83% of the ground floor bedrooms and 100% of 2nd-4th floor ones meeting them. Also now 50% of studios meet minimum daylight standards. In terms of sunlight, 79% of bedrooms and 85% of studios now meet sunlight standards.

- 6.40 It is considered that these improvements are significant and probably the best that can be achieved on the site. There are various factors to be borne in mind here: the existing building does not meet required daylight and sunlight standards here due to the narrow streets and high surrounding buildings and thus any alternative use here would have serious difficulties in meeting minimum standards on lower floors. Indeed permanent housing with its higher standards of amenity would be impossible to achieve here. An alternative layout set back from street frontages to allow more light penetration at lower floors would be unacceptable in conservation area terms. The accommodation provided is not true permanent housing and the nature of student occupation is somewhat transient as they would occupy the campus for longer periods of time and most students would only be in residence here for a year or less. Finally it is reiterated that the BRE tests are only guidelines and should not be applied rigidly regardless of site-specific circumstances.
- 6.41 Inspectors in 2 recent appeal decisions for student schemes in Islington have considered that lower standards of light can prevail for students and that the departure from amenity standards should be balanced against and outweighed by the benefits of a desirable and convenient location for student housing and the need to create an urban form that preserves the conservation area character. In addition to this, the benefits of creating a new sustainable and vibrant landuse on the vacant application site with a building of townscape merit are considered important factors in the scheme's favour.
- 6.42 Finally the outlook from bedrooms on lower floors are considered reasonable here and not unduly oppressive given the nature of the streetscape and the usage of the rooms. The arrangement has been designed to minimise overlooking between bedrooms across the courtyard wherever possible. However the distance between bedrooms and communal lounges here is 8-10m, below the CPG standard to maintain privacy; it is thus recommended that the windows of communal lounges facing the courtyard are obscure glazed up to eyelevel. Similarly it is recommended that the ground floor bedrooms facing the street, due their position directly abutting the pavement edge, have any potential overlooking mitigated by obscure glazing up to eye level (which, due to the varying heights of windows and pavement levels, will vary between each room).
- 6.43 It is therefore concluded that, given the circumstances of the site and its intended users and the constraints on development here, the scheme will provide an adequate level of amenity to the proposed occupants as well as to the surrounding neighbours.

Transport

- 6.44 The site has excellent transport accessibility and no parking onsite. A draft Travel Plan has been submitted which will promote sustainable transport which is commended, but a final version needs to be submitted via a S106 clause. The new use as a student hostel, less than 1km from the new University campus, will ensure that most students will travel by foot or cycle and no onsite parking is proposed. 126 cycle spaces for students are proposed in a secure ground floor room which is above the minimum standard of 113 spaces here (based on 1 space per 2 units), which is welcomed. Additional spaces are provided for the office and studio flats.

The student hostel as well as the studio flats will be all car-free and this will be secured by a S106 agreement.

- 6.45 A draft Construction Management Plan (CMP) and Servicing Management Plan (SMP) have been submitted which are acceptable in principle subject to more detail and need to be secured by S106. Refuse and cycle stores for the students are next to each other and accessed off Britannia Street opposite offices which are considered acceptable in location.
- 6.46 The development will require 2 crossovers to be removed or reduced in width and the surrounding footway will need to be repaved. An estimate made for these works in the last year's withdrawn application was £56,050. In addition, a financial contribution will be required to mitigate the impact of increased generation of activity from this development and it is recommended that £95,000 is sought which is considered appropriate for this scale and kind of development and which would be spent on pedestrian, cycling and environmental improvements in the locality. These will need to be secured by a S106, as well as details of interface levels between the proposed development and public highway.

Noise

- 6.47 The site experiences some noise disturbance from Britannia St traffic and the railway line, although there are very few window openings proposed facing the latter. A noise and vibration survey shows that, although the site falls within a category whereby it is suitable for residential accommodation, the levels are such that noise attenuation measures are required. Appropriate sound insulation is proposed on relevant surfaces and openings on all external boundaries. The vibration levels are within maximum guidelines.
- 6.48 All plant is to be contained within a ground floor room within the courtyard. The only roof level plant will be for the air-source heat pumps in a screened enclosure placed on the central block facing the courtyard which, being lower than surrounding perimeter blocks, will not affect neighbours and will be capable of meeting Council noise standards. The existing single storey building adjoining the railway line will be soundproofed to prevent noise transmission from the proposed performance space here and again due to lack of adjoining residents, should not cause any loss of amenity.

Contaminated land

- 6.49 Environmental Health Officers recommend that a standard condition be placed requiring a ground investigation to take place.

Regeneration

- 6.50 The scheme provides sufficient onsite community space in the form of common room, TV room and performance space/gallery which is adequate for the size of the scheme, in accordance with CPG8 (Planning Obligations) requirements. As it will result in the loss of an existing employment use, regeneration team officers consider it would be appropriate for the Council to request a financial contribution to be paid to fund local training and employment initiatives which will support

unemployed Camden residents to gain employment. The contribution, calculated in line with the formula included in CPG8 is £55,000.

- 6.51 In addition officers request the following standard clauses in a S106-
- a) That the applicant sign by the local procurement code;
 - b) That the site owner work in partnership with the Council to deliver up to two “Meet the Buyer” events /supplier capacity building workshops to promote local procurement/supply chain opportunities associated with the development to Camden SMEs;
 - c) The applicant be required to recruit 1 construction apprentice per £3million of build costs, and pay the Council a support fee of £1,500 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council’s Kings Cross Construction Skills Centre;
 - d) An agreement to work with the Kings Cross Construction Skills Centre, the Council’s construction skills centre in York Way, to support the recruitment of Camden residents to jobs created during the construction of the development and to work towards a target that 20% of jobs are filled by Camden residents;
 - e) That non-construction jobs created in respect of the development be advertised and promoted to local residents as a priority before wider promotion takes place. All jobs to be promoted through local job brokerage or agent as recommended by the Council.
- 6.52 The applicants have agreed to these clauses.

Community/healthcare/public open space facilities

- 6.53 CPG8 recommends that, depending on the scale of development, contributions to existing or new community facilities may be sought. Regeneration officers have recommended that the performance space is made accessible for community use and hence the inclusion of a ‘community space agreement’ clause within the S106 which requires the owner to agree that local residents and community groups will have access to space in the building; the Community Access Plan would be drafted by the Council and applicants and agreed before occupation; it would set out how the space will be fitted out, how the public will be able to use it, the hours/ times when it will be available to the public, and, if there are changes, that these will reflect the additional cost to the owner of making the space available, but not include a profit element. It is understood from Arts team officers that there is a need for affordable rehearsal space for theatre and dance groups and this space could be suitable for such use.
- 6.54 The University expects that this building will be used as either an artist studio or performance rehearsal space; it has confirmed in respect of the previous application that a community space agreement clause within the S106 is acceptable and that the University will allow the community to utilise the space and enter into a Community Access Plan.
- 6.55 CPG8 also recommends that major new development should make a contribution to health care provision. The applicant has confirmed that the University of Arts has 2 health advisors and a partnership with an existing local doctor surgery so that it is anticipated that most students will use these facilities for health advice with minimal impact on local health services. Nevertheless it is acknowledged that there will be

some impact on local infrastructure and that, on account of the additional density of students on this site with minimal open space, there is a desire to facilitate and indeed promote healthy living and recreation for the new occupants with minimal impact on existing community facilities. The level of healthcare contribution was assessed for the previous application in accordance with the HUDU model used in calculating such contributions and now reduced on a pro-rata basis to reflect the new scheme with reduced student numbers. It is estimated that £67,944 is now required, to be spent on health facilities and healthy living programmes in local wards.

- 6.56 CPG6 (Amenity) recommends that public open space is provided onsite or contributions made for its provision or enhancement elsewhere. Although some communal open space for student use is provided on site, it is not sufficient to meet standards. Moreover the neighbourhood is deficient in open space provision according to the LDF, although it is recognised that students will have access to the new Granary square in the University campus. An existing open space and children's playground in Wicklow Street is in need of refurbishment and enhancement and, in the previous application, a ward Councillor requested that a suggested £30,000 contribution be spent on enhancing this space. Calculations based on CPG formulae and taking account of new onsite communal space proposed, show that £112,115 is required, of which some should be spent specifically on the Wicklow St playground to benefit the local community.
- 6.57 The applicants have agreed to these clauses and amounts.

Community Infrastructure Levy

- 6.58 It is calculated that the development will be charged for the full amount based on all new proposed floorspace, which equates to £431,600 (£50 x 8632 sqm).

7. CONCLUSION

- 7.1 The part redevelopment and part retention of buildings on this site is considered acceptable in the context of the conversion of the existing building for alternative uses being impracticable and unviable. The advantages of the current scheme are that it brings back the vacant site into a beneficial use, will retain the most important elements in townscape terms and will create a vibrant use and active frontages to the otherwise commercial area. The overall scheme will preserve the character of the conservation area and setting of adjoining listed buildings.
- 7.2 The new use for student housing is required by a local University and will not lead to 'studentification' of the local area. The site is not designated for housing purposes and indeed the student accommodation as proposed is effectively the only viable use that can be supported here.
- 7.3 The new buildings will not harm neighbour amenity in terms of light, noise or parking conditions. The new student accommodation will receive adequate levels of amenity as far as is possible here, given the constraints of the site and surroundings. The new scheme will meet all sustainability and accessibility standards. Contributions and restrictions have been agreed, to be secured by S106 clauses, to mitigate against any harmful impact on local amenity and infrastructure.

7.4 Planning permission is recommended for approval subject to a S106 Legal Agreement covering the following issues:

- a) car-free flats, offices and student accommodation;
- b) submission of final Demolition and Construction Management Plan;
- c) submission of final Servicing Management Plan;
- d) submission of final Travel Plan;
- e) 'footway reconstruction' contribution of £56,050 and details of public highway interface levels (see para 6.46);
- f) 'public realm improvement' contribution of £95,000 (see para 6.46);
- g) local employment/procurement requirements (see para 6.51)
- h) 'employment' contribution of £55,000 (see para 6.50);
- i) 'Community Access Plan' to enable public access to the proposed Class D1 space (see para 6.53);
- j) 'healthcare and healthy living' contribution of £67,944 (see para 6.55);
- j) 'public open space' (including Wicklow St playground) contribution of £112,115 (see para 6.56);
- k) operation of student accommodation in accordance with submitted Student Management Plan;
- l) restrictions on use of student accommodation- ie. affordable rents, no use as self-contained dwellings etc, students to attend University of Arts or other HEFCE-funded institution (see para 6.15);
- m) achievement of anticipated sustainability targets (BREEAM);
- n) provision of proposed renewable facilities.

7.5 Conservation area consent is also recommended for approval subject to a S106 on a Demolition and Construction Management Plan.

7.6 **LEGAL COMMENTS**

7.7 Members are referred to the note from the Legal Division at the start of the Agenda