

ADDENDUM PLANNING STATEMENT

**KINGS CROSS METHODIST CHURCH, 58A
BIRKENHEAD STREET, LONDON, WC1H 8BW
APPLICATION REF: 2015/7013/P**

**ON BEHALF OF WEST LONDON MISSION CIRCUIT OF THE
METHODIST CHURCH (WLM)**

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1. INTRODUCTION

1.1 This Addendum Planning Statement has been prepared on behalf of West London Mission Circuit of the Methodist Church (WLM) ('the Applicant') following the submission and validation of planning application (Ref: 2015/7013/P) in support of a full planning application for the demolition of the existing buildings and the redevelopment of Kings Cross Methodist Church, 58A Birkenhead Street, London, WC1H 8BW. The application was validated on the 14th January 2016 by Camden Council and seeks permission for the following development:

"Demolition and redevelopment of King's Cross Methodist Church and Methodist Chaplaincy House to provide replacement church facilities (Use Class D1); Community Facilities (Use Class Sui Generis); replacement ancillary Methodist Chaplaincy Housing (Use Class Sui Generis) and No. 11 residential apartments (Use Class C3) including the installation of the necessary plant, ventilation and extraction equipment, cycle storage and refuse and waste facilities".

1.2 The objective of this Addendum Planning Statement (and updated documents) is to provide the reader with a guided tour of the revised scheme in light of feedback received from LB Camden officers since the submission of the application.

The revised scheme

1.3 The applicants, advised by a multidisciplinary team of consultants, have devised a package of development proposals that unlocks important environmental and social benefits, is acceptable in its own right, and responds positively to the planning policy framework for the site.

1.4 As part of WLM's commitment to securing a scheme which can be supported by Camden Council their architects, Dexter Moren Associates, have made significant changes to the proposal submitted in December 2015. The evolution of these changes is set out in 'Revised Design Addendum' provided under separate cover. These changes can be summarised as follows.

1.5 The proposed elevational design of Crestfield Street has been significantly amended by reducing the massing, height and prominence of the 'central section'. The façade has been redesigned to clearly express the sites spiritual and civic function with a bold entrance and 'cross' at first floor. The third-floor side elevations are now proposed as a mansard roof to respect the adjacent

terrace roof appearance and materiality. The top floor side elevations have been significantly reduced by increasing the set back and replacing the materials with light stone cladding. The Birkenhead Street elevation has been revised to form four 'Georgian' terraced volumes that are two bays wide to follow the appearance and dimensions of the adjoining houses. By providing a glazed ground floor frontage to Birkenhead Street, the Church expresses its use – being more visible and inviting than the existing façade. Moreover, the materials and detailing have also been progressed to enhance the character of the active frontage and ecclesiastical use.

- 1.6 The scheme as currently proposed delivers positive heritage related benefits both in terms of securing the on-going provision of the church's activities on the site (evident since the early 19th Century), the townscape improvements brought by the enhancement of both frontages and the associated improvements to the setting of the identified heritage assets.

Revised Planning Application Pack

- 1.7 This revised submission is accompanied by a comprehensive drawing pack. In addition to the drawings, the following updated information is also provided to reflect the revised scheme and to address outstanding matters raised during the course of the planning application process:

- Revised Design Addendum, including Secure By Design and Design Clarification Annexes (prepared by Dexter Moran Associates);
- Revised Heritage Statement (Prepared by Bidwells);
- Revised Daylight / Sunlight Report (Prepared by Delva Patman Redler);
- Revised Energy Statement (Prepared by Ramboll);
- Revised Sustainability Assessment (Prepared by Ramboll);
- Revised Air Quality Assessment (prepared by Ramboll);
- CHP Addendum Report (prepared by Ramboll);
- Revised BREEAM Pre-Assessment Report (prepared by Rambolls);
- Drainage Strategy Report (prepared by Conisbee); and,

- Revised Viability Assessments prepared by HEDCL and Cost Estimates prepared by CalfordSeasden (submitted under separate cover).

1.8 Other documents, already submitted and not superseded (in full or in part) make up the full planning submission and are listed below for completeness:

- Planning Statement;
- Statement of Community Involvement;
- Noise Assessment;
- Design & Access Statement;
- Ground Investigation & Basement Impact Assessment Report;
- Transport Statement; and
- Travel Plan Statement

1.9 The following section reviews the principal considerations material to the determination of this application. It is not intended to be an exhaustive appraisal of the proposed development's performance against planning policy (this is achieved by the various reports accompanying the application). Rather, this Statement seeks to evaluate the challenges, reveals the opportunities and identify the benefits to be delivered by the grant of planning permission, focusing on the updated scheme and revised supporting material.

2. PLANNING ANALYSIS

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 dictates that planning applications are to be determined in accordance with the Development Plan, unless material consideration indicates otherwise.
- 2.2 The Development Plan for the proposals comprise:
- The London Plan (2016); and
 - Camden Local Plan (2017).
- 2.3 Material Considerations are the Planning (Listed Buildings and Conservation Area) Act 1990; the National Planning Policy Framework (2018) (NPPF); and the National Planning Practice Guidance. With respect to Supplementary Planning Documents, it is considered that the guidance of particular relevance is Camden Planning Guidance 'Housing', 'Amenity' and 'Community Uses, Leisure Facilities and Pubs' and 'Planning for Health and Wellbeing'.
- 2.4 The Kings Cross and St Pancras Conservation Area Character Statement and the Bloomsbury Conservation Area Appraisal and Management Strategy also form Material Considerations to the assessment of this planning application.
- 2.5 In addition to the Conservation Area status, Camden Council's adopted Proposals Map indicates that the application site lies within the core Central Activities Zone.
- 2.6 The key planning considerations for the proposals in light of the revised submission are:
- Principle of the Land Uses;
 - Design & Heritage Considerations;
 - Sustainability and Energy Issues;
 - Drainage Issues; and
 - Other Material Considerations.

Principle of the Land Uses

King's Cross Methodist Church & Community Facilities

- 2.7 As proposed, the development will provide a new Methodist Church in this established ecclesiastical location. The new Methodist Church will provide modern facilities for the congregation and community projects including updated accommodation in the Methodist Chaplain House (MCH) in accordance with **Policy C2 Community Facilities**. The proposal seeks to underscore's Camden's desire to provide the needs of faith communities during the Plan period. Paragraph 4.39 of the Camden Local Plan states '*The Council welcomes investment by faith communities to develop new space to meet or worship, subject to other policies in the Local Plan*'. This application supports this important objective of the Local Plan.

Residential Element

- 2.8 Residential development continues to be a priority land use across London. Camden seeks to exceed the target of 16,800 homes set out in **Policy H1 'Maximising Housing Supply'**. A total of 11 self-contained flats will be provided which is recognised as priority housing within the Local Plan and reflects the requirement of **Policy H2 'Maximising the supply of self-contained housing from mixed use schemes'**.

Standard of Residential Accommodation

- 2.9 In accordance with **Policy H6 'Housing Choice and Mix'** the proposed dwellings have been designed to be functional, adaptable and accessible spaces.
- 2.10 **Policy A1 'Managing the Impact of Development'** provides further criteria in which proposed developments should be assessed to determine the impact on the amenity of existing and proposed occupiers. Each criterion is addressed in turn below:
- 2.11 Regarding the privacy and outlook, the rear elevation to the Crestfield Street building has been re-designed to reduce the overlooking between the MCH and the residential element of the scheme. This has been achieved through the installation of oriel windows to the rear elevation of the Crestfield Street block.
- 2.12 All the residential accommodation is dual aspect with principal outlook overlooking Birkenhead Street and secondary views toward a central courtyard, which will be managed and maintained by the Methodist Church. In this regard,

it is considered that the proposed residential development will have an excellent outlook.

- 2.13 A revised Daylight and Sunlight Assessment has been undertaken by Delva Patman Redler. The Assessment has been undertaken in accordance with the BRE Guidelines for residential development and included an assessment of the proposals on existing neighbouring amenity and the amenity of the proposed occupiers. The Assessment concluded that the impact of the proposed development is considered acceptable in daylight and sunlight terms. The scale and mass of the proposed development would not result in detrimental impact upon neighbouring properties in terms of daylight and sunlight.
- 2.14 Having due regard to the above, the proposed development would not cause harm to the neighbouring occupiers or future occupiers in terms of overshadowing and levels of daylight and sunlight.
- 2.15 A previously submitted Acoustic Assessment has been prepared by Sharp Redmore, the Assessment considered the impacts of the existing environment on new residential accommodation, the impact of the King's Cross Methodist Church upon the residential accommodation and the construction noise impacts. It was concluded that, subject to mitigation measures to minimise the impact of noise from traffic and street activity within the King's Cross Area, there would be no significant impact or disturbance to the existing or proposed future occupants because of the operational development.
- 2.16 The proposed development will introduce residential receptors into a location where air quality is likely to exceed the air quality objective for annual mean NO2 at external locations. As such, an updated Air Quality Assessment has been undertaken by Ramboll in support of the application. The Assessment identifies that mitigation measures, built into the design ensure that exposure to poor air quality is reduced. These measures include a mechanical ventilation system fitted with pollution filters which will provide future occupants with a clean source of ventilation.
- 2.17 A Basement Impact Assessment has been prepared by Conisbee, the Assessment concludes that groundwater is not likely to be encountered during the construction of the basement and therefore no impacts on the local hydrology are envisaged. Furthermore, given the absence of contamination on the application site there is no requirement for remedial measures. The construction of the

basement can commence in a conventional manner using mass concrete underpinning coupled with a bored piled wall.

- 2.18 In terms of odour, kitchen extraction and ventilation equipment associated with the KXMC will be fitted with the appropriate filters to limit the dispersion of odour into the environment. The updated Air Quality Assessment prepared by Ramboll, concludes that the residential development in this location would not be adversely affected by Air Quality
- 2.19 The above demonstrates that the development proposals would fully accord with the relevant criterion in Policy A1.
- 2.20 In terms of standard of accommodation, the residential component is wholly acceptable.

Residential Tenure

- 2.21 Whilst the application site benefits from the highest PTAL rating (6b) and therefore affords access to workplaces, shops and services, the amount of development on the application site is significantly constrained by the Conservation Area designation, the neighbouring Listed Buildings and the re-provision of the KXMC and the community facilities.
- 2.22 Given the amount of development proposed on the application site there is a requirement for a single affordable unit. If the provision of this unit were financially viable, the unit could not be accommodated on a single floor and therefore one floor within the building would need to provide private and affordable accommodation. This would raise maintenance issues for a Registered Social Landlord associated with the shared common parts of the building and the single access arrangement. In our view, a Registered Social Landlord is unlikely to find the provision of one unit attractive, as they would be unable to utilise economies of scale in addressing the management costs.
- 2.23 Furthermore, the service charges associated with the common areas and services would be expensive for the registered provider. Failure to apportion costs equally between tenants for the management and maintenance of the building, provision of services such as lighting and cleaning of common areas and building insurance could result in challenge from private leaseholders. Given the above, it is therefore considered inappropriate to provide on-site affordable housing.

- 2.24 Housing and Economic Development Consultancy Ltd have prepared a financial viability assessment to accompany the planning application. The viability assessment provides a detailed account of the costs associated with the redevelopment and improvement of the site. It shows that net receipts from the sale of the residential units, and hence viability of the scheme, will be impacted by including a unit of affordable housing. In this regard, the scheme does not provide affordable housing on-site or a payment in lieu towards off-site affordable housing.
- 2.25 As evidenced within this Statement, the redevelopment of the application site will provide enhanced community facilities in this highly accessible location. The facilities will continue to fulfil an important social role not only for the KXMC congregation but, also for the surrounding communities.
- 2.26 In short, the principle of re-providing replacement church facilities (Use Class D1); Community Facilities (Use Class Sui Generis); replacement ancillary Methodist Chaplaincy Housing (Use Class Sui Generis) and No. 11 residential apartments (Use Class C3) is acceptable.

Design & Heritage Considerations

Design

- 2.27 The Design and Access Statement and revised Design Addendum document provides a full detailed account of the proposals and the context of the application site and the wider area. In relation to the criterion set out in **Policy D1 'Design'**, due regard has been given to the character and setting of the proposed development, and the scale, height and overall appearance of the buildings on Birkenhead Street, responding positively to the neighbouring buildings to create a continuous and harmonious street scene. Due care and attention has been paid to the character and appearance of the King's Cross Conservation Area and Bloomsbury Conservation Area to create a development that does not detract or cause harm to its heritage assets.
- 2.28 The Birkenhead Street elevation has been revised to form four 'Georgian' terraced volumes that are two bays wide to follow the appearance and dimensions of the adjoining houses. In terms of its ground floor frontage, the internal use of the Church at this side is the main chapel and events space. By providing a glazed frontage to Birkenhead Street, the Church expresses its use – being more visible and inviting than the existing façade. Moreover, the materials and detailing have

also been progressed to enhance the character of the active frontage and ecclesiastical use.

- 2.29 With regard to Crestfield Street, the proposed development now announces the function of the Church on Crestfield Street and is ecclesiastical in appearance. As detailed within the revised Design and Access Statement and Heritage Statement, there is a varied form and scale to the buildings along Crestfield Street. The proposed development contributes to this varied character whilst respecting the proportions of the street and the site itself, to provide a local landmark and visual expression of the Church (both in height and projection) and creates a visually interesting frontage.

Conservation and Listed Buildings

- 2.30 A revised Heritage Statement has been prepared to reflect the current scheme.
- 2.31 **Policy D2 'Heritage'** seeks to maintain the character of Conservation Areas and preserve the character of the Borough's Listed Buildings. In accordance with the requirements of **Policy D2** due care and consideration has been given to the design of the proposals to create a form of development that preserves and enhances the character of both the Bloomsbury and King's Cross Conservation Areas.

Conservation Areas

Crestfield Street Elevation

- 2.32 The Crestfield Street elevation is not recognised within the King's Cross Conservation Area Audit as making a positive contribution to the Conservation Area; as such its removal would not cause harm to the character or appearance of the Conservation Area. In contrast, the proposed development of the Crestfield Street elevation is assessed as making a positive contribution to the townscape and the Conservation Area in that it creates a landmark and identifies the presence and the function of the KXMC, whilst respecting the townscape features and character of the buildings along Crestfield Street.

Birkenhead Street Elevation

- 2.33 With regard to the Birkenhead Street elevation, of relevance is Part f) of **Policy DP2**, which seeks to prevent the total loss or substantial demolition of a building, which is identified as making a positive contribution to a Conservation Area. The King's Cross Conservation Area identifies No. 58A Birkenhead Street as making a

positive contribution to the character and appearance of the Conservation Area. Having due regard to the above a detailed assessment of No. 58A Birkenhead Street has been undertaken to determine the significance of the building and the impact of the loss of the building on the Conservation Area.

- 2.34 The accompanying revised Heritage Statement identifies that the form of the existing Chapel is in stark contrast to the existing buildings on Birkenhead Street in terms of the rhythm, proportions and material detailing. The Chapel itself has been significantly altered overtime consequently it is concluded that the much-adapted appearance of the building makes a low / medium contribution to the townscape and visual value to the Conservation Area. The townscape of Birkenhead Street itself is assessed as medium and therefore there is scope to accommodate change, and a replacement could enhance the character and appearance of the Conservation Area in accordance with Part e) of **Policy D2**.
- 2.35 Dexter Moren Associates have also undertaken a feasibility study to investigate the retention of the Birkenhead Street façade. As mentioned earlier, this frontage has been drastically altered from its original, elegant arrangements into something which appears to be a hybrid between ecclesiastical and residential use. Whilst it undoubtedly possessed some of the simple elements which characterise the Methodist chapel type, it now looks like a poorly converted building.
- 2.36 Nonetheless, a 'Birkenhead Street Façade Full Retention Feasibility Study' was produced and submitted in November 2017. This document credibly concluded that it's neither feasible in physical terms nor viable in financial terms to retain the Birkenhead façade in delivering the enhancement of the uses on the site. However, the removal of the Birkenhead Street façade by way of the current scheme will enable the continued use of the site as a place of worship as well as securing many community weekday activities and outreach programmes. The proposed development replaces the fabric of low-level significance to provide a high-quality design response which reinforces and positively responds to the character of Birkenhead Street and the King's Cross Conservation Area as a whole. Put another way, the townscape and public benefits of the proposal clearly outweigh the retention of the Birkenhead Street elevation. The existing facilities are old, run down and unsuitable for modern requirements. If improvements are not initiated by KXMC (and redevelopment is the only viable

option) then there is a long term threat that the church will be shut down and the wider community benefits associated with the operation on the site will be lost.

- 2.37 As proposed, the Birkenhead Street elevation responds to the characteristics of the street, through the reinforcement of the parapet heights, the strong course alignment, rhythm and appearance. It is considered that the proposed development is a positive addition, which enhances the qualities and character of the Birkenhead Street elevation as it will create consistency within the townscape, which is recognised as a positive attribute as part of the Bloomsbury Conservation Area and complements the character of the King's Cross Conservation Area.

Listed Buildings

- 2.38 Given the location of the application site, the Heritage Statement also considers the impact of the proposals upon the setting of the neighbouring Listed Buildings in accordance with the Part k) of **Policy D2**. For completeness the Listed Buildings are:

- 1 – 5 Crestfield Street – Grade II Listed
- 1 - 7 Birkenhead Street – Grade II Listed
- 54 – 58 Birkenhead Street – Grade II Listed
- 59 Birkenhead Street – Grade II Listed

Crestfield Street

- 2.39 Because of the proposals there will be a change to the townscape along Crestfield Street. The proposed development in this location identifies its operation and function as a Church and is ecclesiastical in appearance. It is documented that the existing townscape along Crestfield Street can accommodate a change in the townscape. However, whilst the building would generate positive townscape benefits in comparison to the existing situation, there will be a degree of distraction from the Listed Buildings at No. 1 – 5 Crestfield Street.

Birkenhead Street

- 2.40 The setting of the Listed Buildings on Birkenhead Street will benefit from the proposed residential development as it will complement their appearance and the character of the street. The setting of the Listed Buildings along Birkenhead Street will be preserved in accordance with Part k) of **Policy D2**.

Overall Design & Heritage Conclusions

- 2.41 In terms of the application of legislation and policy, it is considered that special regard has been paid to the objective of preserving the special interest and settings of the identified listed buildings. This is explicit in the approach taken to the design of the scheme and the particular treatment to these assets. Special attention has also been paid to the preservation or enhancement of the character and appearance of the Conservation Area, in accordance with Section 72 of the Act. The current scheme is an appropriate and acceptable replacement of the existing building, providing a more architecturally resolved elevation to both street frontages and providing improved accommodation to retain the church facilities in this location.
- 2.42 We consider that any purported harm associated with the loss of the existing building is significantly outweighed by the public benefits of retaining the church and community facilities on the site in perpetuity as well as the townscape improvements associated with the enhancement of both frontages through the redevelopment option. Façade retention of the Birkenhead elevation has been explored and is not an option. Put another way, this proposal delivers a wholly acceptable architectural solution in a sensitive location allowing for significant public benefit to be delivered. As such, the revised proposal is acceptable in design and heritage terms.

Sustainability and Energy Issues

- 2.43 **Policy CC1 'Climate Change Mitigation'** requires all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met. The submitted revised Energy Assessment follows the GLA's Be Lean, Be Clean, Be Green methodology. The assessment predicts that the development will meet the targets for carbon reduction set by the relevant authorities. In addressing the 'Be Clean' element, in the absence of a District-wide Heating Network, a site Combined Heat and Power (CHP) system has been identified as the preferred solution.
- 2.44 The accompanying revised Air Quality Assessment, prepared by Ramboll concludes that the CHP would be fitted with a catalyst to significantly reduce emissions of NO_x to levels that would comfortably meet the emission limits included within the Mayor of London's Sustainable Design and Construction SPG. The accompanying screening assessment indicates that emissions from the CHP will have a negligible impact on air quality.

- 2.45 The emissions from the proposed development have been compared with the emission benchmarks for transport and buildings set out in the Mayor of London's Air Quality Neutral guidance. This indicates that the proposals comfortably meet the relevant benchmarks and can be considered to be Air Quality Neutral. The proposed development will therefore not cause harm to air quality in accordance with '**Policy CC4 Air Quality**'.
- 2.46 In accordance with Policy 5.2 of the London Plan 'Minimising Carbon Dioxide Emissions', the submitted BREEAM Assessment concludes that the KXMC element of the scheme will achieve a BREEAM 'Very Good' rating in accordance with Building Regulations.

Drainage Issues

- 2.47 A Drainage Strategy has been prepared by Conisbee and is submitted in support of the planning application. The Drainage Strategy follows the Drainage Hierarchy specified within Paragraph 8.57 of the Camden Local Plan and **Policy CC3 'Water and Flooding'**.
- 2.48 Given the size of the site significant storage of rainwater for later use cannot be achieved, infiltration techniques have also been dismissed due to the underlying clay. However, a significant amount of rainwater will be attenuated in blue and green roofs. Where this cannot be achieved at roof level a storage tank and pumping station will be required at basement level to accommodate 41.8 m³, this will be located beneath the central light wells.
- 2.49 Thus, the proposed development will discharge water at a rate of 5 l/s which is an improvement beyond the existing situation. In accordance with Policy CC3 the proposed development will be fitted with water efficiency measures, and the provision of these can be secured by condition.

Other Material Considerations

- 2.50 The National Planning Policy Framework (NPPF) sets out the Government's policies to ensure that the planning system achieves sustainable development.

At **Section 2** of the NPPF, the Government identifies three dimensions to sustainable development, giving rise to the following:

- An Economic Role;

- A Social Role; and
- An Environmental Role.

2.51 As proposed the demolition and redevelopment of KXMC will assist in achieving the three dimensions of sustainable development, as set out in the NPPF. In achieving an economic role, the proposed development will intensify the use of this previously developed site, the demolition and construction will contribute to the provision of construction jobs, which in turn will contribute to additional spending in the local economy. A choice of high quality homes will also contribute to the economic role of the NPPF.

2.52 The provision of new homes on the application site also fulfils the social dimension of the NPPF. Furthermore, the new, modern church facility will improve the existing community facilities currently offered at KXMC. A new building will allow KXMC to continue to serve the existing communities at King's Cross, and expand and intensify these services, ensuring that they are secured for future generations. This is a significant public benefit.

2.53 Because of the proposals, a new, high quality building is proposed. The new building seeks to make a positive contribution to the townscape and preserve and enhance the historic environment. In addition, the environmental performance of the building will be greatly enhanced thereby, contributing further to the environmental role of the NPPF, ensuring that natural resources are used prudently, to minimise waste and adapt to climate change. The proposed green roof will offer biodiversity benefits alongside reducing the rate at which surface water currently drains from the application site, into the combined sewers on Birkenhead Street and Crestfield Street. Finally, the efficient use of previously developed land also seeks to fulfil the environmental role.

2.54 As proposed, the development would achieve the three dimensions of sustainable development as set out in Paragraph 7 of the NPPF.

3. CONCLUSION

- 3.1 This addendum Planning Statement supports the planning application for the demolition of the existing buildings and the redevelopment to provide enhanced church facilities (Use Class D1); Community Facilities (Sui generis) for ongoing charitable work; replacement ancillary Methodist Chaplaincy House (Sui generis); and residential apartments (Use Class C3).
- 3.2 King's Cross Methodist Church occupies an important site in what has historically been the heart of King's Cross. It is recognised that the area is changing, physically, socially and economically and whilst the development opportunities present positive change it is important that the existing communities continue to be cared for.
- 3.3 From this historic location, King's Cross Methodist Church plays a pivotal role in serving the community at King's Cross. King's Cross Methodist Church is not just a place of worship, the Church hosts a large community orientated congregation from which numerous outreach programmes have developed.
- 3.4 The redevelopment of the Methodist Church will enable the expansion of the existing services and the introduction of new services to the local community in new, fit for purpose, modern building.
- 3.5 The submitted Façade Retention Study (November 2016) demonstrates that façade retention is not feasible as part of a qualitative redevelopment option. Furthermore, the accompanying Heritage Statement demonstrates that the architectural significance of the Methodist Church has been eroded over time due to numerous external alterations.
- 3.6 As proposed, the Birkenhead Street façade provides a continuation of the host terrace; it is domestic in scale; and responds to the alignment, proportions and materiality of the existing buildings and neighbouring residential properties.
- 3.7 A total of 11 new high quality residential homes will be accessed from Birkenhead Street and these self-contained homes will contribute towards the Council's housing target.
- 3.8 It is proposed to re-locate the main church entrance to Crestfield Street and as such the Crestfield Street elevation is ecclesiastical in appearance and massing, to respond to Council's comments but also announcing the Methodist Church to

the wider area in a physical form (such presence is currently lacking). The overall proposal for the Crestfield Street elevation seeks to uplift the architecture of the Street to create a new townscape and encourage the regeneration of the area to the south of Euston Road.

- 3.9 Furthermore, the development proposals provide a great opportunity for the continuation and expansion of social and community programmes to residents, workers, students, visitors and worshippers in and around Kings Cross.
- 3.10 This addendum Planning Statement and the planning application documentation demonstrates that the proposed development is wholly sustainable in that it enables growth without compromising the historic environment; the existing or future communities that the development proposals will serve.
- 3.11 The proposed development accords with the Development Plan for the application site and the identified material considerations and should be permitted, in accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and Paragraph 47 of the NPPF.