

PLANNING STATEMENT

In respect of

Phoenix Yard, 65-69 King's Cross Road, London, WC1X 9LW

On behalf of Shephard Epstein Hunter

JCG24347
Phoenix Yard
February 2020

REPORT

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1 INTRODUCTION

- 1.1 This Planning Statement is submitted on behalf of the applicant, Shephard Epstein Hunter (SEH) in support of a full planning application for a two storey extension of the existing building to provide commercial and residential accommodation with an infill of courtyard and minor external changes at Phoenix Yard, 65-69 King's Cross Road, WC1X 9LW ("the Site").
- 1.2 Planning permission is sought for the increase in floor area of the buildings through provision of two additional storeys and infill of the existing courtyard, to provide new office accommodation (Use Class B1) and residential units (Use Class C3). ("the Development").
- 1.3 This Statement provides a detailed description and explanation of the Development and the assessment and justification against the relevant national and local planning policy and guidance.
- 1.4 The Development has been subject to two pre-application discussions with Planning, Heritage and Design Officers at the London Borough of Camden, through which the principle and design of the proposal has been agreed.
- 1.5 This Planning Statement should be read in conjunction with the accompanying drawings, together with the Design and Access Statement and supporting technical assessments which include:
 - Acoustic Report, prepared by KP Acoustics (ref: Report 20048.PCR.01 Rev A)
 - Air Quality Assessment, prepared by Dustscan (ref: Rev B);
 - BREEAM Predicative Assessment, prepared by envision (ref: 28th January 2020)
 - Construction Management Plan, prepared by Jerram Developments Ltd (ref: Version Outline 01);
 - Daylight & Sunlight Assessment (External), prepared by GIA (ref: 03rd February 2020);
 - Daylight & Sunlight Assessment (Internal), prepared by GIA (ref: 22nd January 2020 REV A);
 - Energy and Sustainability Statement, prepared by ENGINE (ref: 20th January 2020); and
 - Heritage Assessment, prepared by RPS (ref: JCH00797, February 2020)

1.6 The remainder of this Statement is structured as follows:

- Section 2 describes the site and surrounding area;
- Section 3 outlines the planning history of the site;
- Section 4 provides a detailed description of the development;
- Section 5 sets out the planning policy framework against which this proposal is to be assessed;
- Section 6 assesses the proposals against the relevant planning policies; and
- Section 7 summarises the planning assessments and sets out overall conclusions.

2 SITE AND SURROUNDING AREA

The site

- 2.1 The application site is located at Phoenix Yard, 65-69 King's Cross Road, WC1X 9LW, within the London Borough of Camden. The site is located on the West side of King's Cross Road. The site is bound to the North by Nos. 71-79, a part-4 and part-6 storey residential building, and to the South by No. 63, which is part of a terrace of three storey terraced houses.
- 2.2 The application site is 668 sq. m in size and is comprised of three interconnected buildings arranged around a small shared courtyard. The buildings are currently occupied by the Applicant and a number of businesses, as offices in a flexible co-working environment (Class B1).
- 2.3 No 65 is a L-shaped building accessed from the courtyard. The part of the building fronting onto Kings Cross Road is two storeys in height, whilst the rear element of the building, which is to the rear of 45-63 Kings Cross Road to the south, is three storeys with a hipped roof.
- 2.4 Nos. 67-69 are three storeys in height and are also L-shaped, enclosing two sides of the courtyard. All buildings on site also have basements.
- 2.5 The buildings contain a mixture of different historic fabrics, with materials from different periods of construction, characterised by exposed brick, steel, wood and modern finishes. The external walls of nos. 67-69 appear to date from the mid-late nineteenth century and are mostly unremarkable.
- 2.6 None of the buildings on site are statutory listed or locally listed. The terrace to the east of site, nos. 44-58 King's Cross Road, along with the terrace directly to the south of the site, nos. 45-63 Kings Cross Road, are Grade II listed.
- 2.7 The site is located in the Bloomsbury Conservation Area, which was first designated in 1968. The Bloomsbury Conservation Area appraisal outlines that the area covers a range of development dating from the eighteenth century onwards, though predominantly dated from the nineteenth century and residential in character. The significance of the sub area is derived from its character and appearance of historic urban form predominantly dating from the nineteenth century, mostly residential, and organised on a hierarchy of streets from the more prominent Grays in Road, the secondary Kings Cross Road and finally the interstitial streets between them running east to west.
- 2.8 The site is designated as making a positive contribution to its character and appearance to the Bloomsbury Conservation Area and is located within Sub Area 14 (Calthorpe Street/Frederick Street) as noted within the Conservation Area Appraisal.
- 2.9 It is understood that the site's positive contribution is primarily derived from the appearance of the late nineteenth century No. 69 to the road and the historic interest of previously industrial buildings within the setting of nineteenth century built-form. The courtyard space, and elements of architectural form (such as the arches in the brick return wall to No. 65 visible from the street) all contribute to this. Visible from the rear, the curving rear wall of the Site, with its various phases of historic brickwork, pattern plates and piers follows the historic line of the river fleet, and as such also makes a contribution to the historic development of the conservation area and its special character and appearance.

- 2.10 For further information on the history of these buildings and any historic significance is contained within the accompanying Built Heritage Statement.

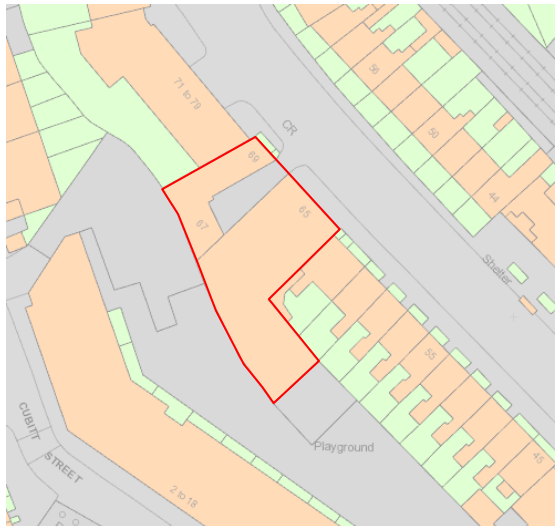


Figure 2.1: Site Location Plan

- 2.11 There are no trees within the boundary and the entire site is covered by hard standing and the buildings themselves.
- 2.12 The site benefits from excellent public transport accessibility with a PTAL of 6B. More particularly, the site is within walking distance of King's Cross St. Pancras Underground Station, King's Cross Railway Station and St. Pancras International Railway Station (approximately ten-minute walk) which together are served by six Underground services, five National Rail services and International Rail services. The site is also well served by various bus routes which operate along King's Cross Road, with the closest bus stop – Gwynne Place (Stop PT), located five metres away from the site.
- 2.13 The site benefits from close proximity to a range of amenities and local shops and services on Farringdon Road and at King's Cross Station. It is also a short walk from Granville Square, St George's Garden and St Andrew's Garden.
- 2.14 The site is subject to the following policy designations in the Camden development plan:
- Central London Area;
 - Bloomsbury Conservation Area;
 - Archaeological Priority Area; and
 - Viewing Corridor.

- 2.15 King's Cross Road is the boundary between LB Camden and LB Islington, and so properties on the opposite side of the road are in LB Islington and are within its New River Conservation Area.
- 2.16 The application site is located within Flood Zone 1 (lowest level of flood risk), as detailed within the Environmental Agency's online flooding maps.

Surrounding Area

- 2.17 The site is located to the north west of the Mount Pleasant Mail Centre and south east of King's Cross St. Pancras Underground Station.
- 2.18 The surrounding area is characterised by a mix of Victorian era residential properties of varying sizes and designs, together with modern buildings. Whilst the historic residential terraces are generally three storeys in height, with more recent buildings range in height from four to nine storeys.
- 2.19 The building bound to the north of site – Nos. 71-91 Kings Cross Road, is a part-4 and part-6 storey modern residential building, comprises of 27 residential units.
- 2.20 Nos. 12-18 Cubitt Street is bound to the west / south west of the site, comprises a three storeys terraced house, with its residential open area and children play space adjoins the site.
- 2.21 A summary of the planning history of the site and surrounding site is detailed in the following section.

3 PLANNING HISTORY

3.1 The detailed planning history is outlined below.

Application Site

3.2 The Council's online planning records outline the following planning history for the site:

Reference	Address	Description	Status
2006/3639/P	65 Kings Cross Road London WC1X 9LN	Replacement of glass blocks with steel louvres within window openings to the rear elevation.	Granted 06 October 2006
2004/5213/A	65 King's Cross Road London WC1X 9LN	Display of externally illuminated projecting sign to Kings Cross Road elevation.	Refused 28 January 2005
PSX0304137	Phoenix Yard 65 Kings Cross Road London WC1X 9L	Replacement of existing tiled roof with slates, replacement of rooflights and roof lantern and associated works, as shown by drawing numbers: 02018/pl01, 02018/pl02, 02018/pl03, 02018/pl04, 02018/pl05, 02018/pl06, 02018/pl07, Detail of materials.	Granted 25 March 2003
PS9805023	65 Kings Cross Road, WC1	Change of use of 1st and 2nd floors from B1(c) use to use as the residential flat together with the provision of a roof extension and a balcony, as shown on drawing numbers 089/98/P01 to /P04, /P07 to /P10, and /P12 to /P20.	Refused 11 December 1998
400793	69 Kings Cross Road WC1	Application for Certificate of Lawfulness for the proposed use of the building as office space (Class B1).	Grant Established Use Certificate, 08 July 1994

Table 3.1: Site Planning History

3.3 In 2006, an application was submitted for the replacement of glass blocks with steel louvres within window openings to the rear elevation for the upgrading work for the overall building.

Adjoining Site

3.4 The building to the north of site, Nos. 71-91 Kings Cross Road, is a part-4 and part-6 storey modern residential building, which was granted planning consent in 2007 (LPA ref. 2006/3673/P), for the redevelopment of a petrol station to provide 27 residential units. The Delegated Report confirms the proposed height is considered acceptable and made reference to no. 69 King's Cross Road, which it states that "*The height and form of the proposal appropriately would mediate between the adjacent 6 storey building to the north and the lower 3 storey terrace to the south, avoiding a crude 'wedding cake' style stepping up of building form.*"

Pre-Application Discussion

3.5 This proposal has been subject to two pre-application discussions with London Borough of Camden:

June 2019 – Pre-Application Meeting 1

3.6 In June 2019, an initial pre-application meeting was held with LB Camden to discuss the option of a two storey extension to provide additional office (Class B1) floor space.

3.7 Whilst Officers welcomed the proposal of providing employment floorspace along with external enhancement to the building, it also noted that Policy H2 would require 50% of all additional floorspace to be self-contained residential as the proposed development comprised additional floorspace of more than 200 sq. m (GIA). In addition, Officers also advised that where housing is required as part of a mix of uses, the Council will require self-contained housing to be provided on site, particularly where 1,000 sq. m. (GIA) of additional floorspace or more is proposed. It was discussed whether there could be flexibility in applying the policy, as the uplift in floorspace was less than 1,000 sq. m.

3.8 Officers agreed that there was scope for a roof extension and an infill to the existing building. The protection of special interest and setting of the neighbouring buildings was emphasised, and any upward extension should respond to the individual character of the existing buildings on site.

3.9 Officers considered that linking the existing buildings may be possible, provided the openness and legibility of the yard is preserved.

3.10 It was agreed that a mixed-use option comprised of residential and office accommodation should be explored prior to the second pre-application meeting.

November 2019 – Pre-Application Meeting 2

3.11 In November 2019, a second pre-application meeting was held with LB Camden to discuss the progressed design and whether a mixed use or solely office scheme would be appropriate.

3.12 The design had been revised to address the Officers' previous comments:

- The massing of the extensions had been amended to read as two separate roof extensions with a glazed link section.
- The glazed link was recessed from the existing buildings to form a shadow gap.
- The roof extensions above 65 and 69 Kings Cross Road had been set back from the front building lines.
- The courtyard space was proposed as an internal atrium with bridging elements at upper floor levels to join the two buildings.
- Alterations to materiality, to consider the use of metallic cladding, perforated metal screening, aluminium framed windows and a glazed curtain wall.

- 3.13 Four different mixed-used options involving different unit mixes were explored and discussed. It was considered that three of the proposed options were not feasible, due to space restriction and amenity concerns. Officers commented that the remaining residential option should be explored further.
- 3.14 Officers confirmed the revised design proposal had taken “*some really positive steps to help break up the massing of the proposal and to respect the original form of the site*” and the design vastly improved since the initial proposal.
- 3.15 The collection of buildings could now be considered as separate elements, which the shadow gap glazed link in principle was considered a positive feature.
- 3.16 The Officers confirmed that the provision of additional office floorspace was considered to be acceptable in principle, subject to the requirements of Policy H2, which seeks to deliver mix-used developments.
- 3.17 Over the course of subsequent email correspondence, the design and the configuration of proposed development were discussed. The revised design has incorporated the previous concerns raised by the Officers, including the relationship between the commercial and residential schemes, the provision of on-site amenity space and the design of the upward extension. The Officers supported the scheme based on the preferred revised designs. It was agreed the provision of mixed use development, which the layout and the quality of accommodation was also agreed particularly given the constraints arise from the site’s urban location.
- 3.18 The Council supported the preferred proposal which involves the change of use of No. 69 into 4 residential units following the second pre-application discussion and the roof extension to Nos. 65-67 to provide additional office (Use Class B1) floorspace. The Council confirmed that the configuration for the aforementioned proposal would “*work best in this instance*” and would accept the arrangement for the proposed development.
- 3.19 The proposal was finalised on the basis of these discussions and is detailed in the following section.

4 PROPOSED DEVELOPMENT

- 4.1 Planning permission is sought for the increase in floor area of the buildings through provision of two additional storeys and infill of the existing courtyard, to provide new office accommodation (Use Class B1) and residential units (Use Class C3).
- 4.2 The proposal seeks to extend and upgrade the existing buildings to build upon the success of Phoenix Yard as a dynamic and innovative office scheme, serving the needs of a wide variety of local businesses and residents. The development will retain the office space within the existing buildings, introduce residential units, together with external amendments and infills to improve the overall condition of the building.
- 4.3 The proposal involves a part one and part two storey upward extension of the existing buildings and the infill of the existing courtyard to provide a central atrium space. In addition, the proposal will create the new entrance to the commercial building in the enclosed courtyard area, providing separate entrances for the residential and commercial units, together with enlarged windows. The existing courtyard will be infilled to provide a large open atrium for the offices at No. 65 – 67 King's Cross Road.
- 4.4 The structure of the proposed extension will be designed so that it is not detrimental to the existing fabric of No. 65 in order to protect any retained internal historic features. The proposal would also not affect the existing three storey element of No. 65 that is to the rear of 45-63 Kings Cross Road.
- 4.5 Residential units will be created through both change of use and increase in floorspace at No. 69 Kings Cross Road, with the residential access stair located in No. 69 Kings Cross Road. The total uplift on GIA floorspace from the scheme will be 664 sq. m, of which 306 sq. m would be office (46%) and 358 sq. m residential (54%) uses. The proposed residential units will have private amenity space in the form of private balconies details are outlined in Table 4.1 below:

Floor Level	Unit Type	Floor Space (GIA)	Proposed Amenity Space
1	2 Bed 3 Person	73.3 m ²	Balcony (6.9 sq. m)
2	Studio	38.3 m ²	Balcony (4.7 sq. m)
2	1 Bed 2 Person	55.0 m ²	Balcony (5.3 sq. m)
3	2 Bed 4 Person	74.3 m ²	Terrace (11.1 sq. m)

Table 4.1: Proposed Residential Unit

- 4.6 The proposal will also provide seven cycle spaces for the proposed residential unit, together with residential buggy storage at ground floor.
- 4.7 The waste and recycling storage for the office and residential uses will be located on the ground floor of the building, within a designated refuse/recycling storeroom accessed from King's Cross Road.
- 4.8 The proposed dedicated bin storage area for the residential scheme will contain sufficient capacity for the four new residential units and the details are outlined in Table 4.2 below:

Type of Waste	Type of Storage	Footprint Size	Total Provided
General	120 litre Wheelie Bin	550 x 615	4
Recycling	140 litre Wheelie Bin	550 x 615	4
Food	23 litre Kerbside Caddy	400 x 320	4

Table 4.2: Proposed Residential Waste Storage Details

- 4.9 The design will ensure through careful detailing and choice of materials that the increased massing will enhance the street scene without visually dominating, especially in relation to the listed Victorian terrace at No. 63.
- 4.10 The proposed development will be assessed based against the relevant policies outlined in the following section.

5 PLANNING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 5.2 In this instance, the Development Plan consists of:
- The London Plan consolidated with alterations (GLA, March 2016); and
 - Camden Local Plan (LB Camden, July 2017).
- 5.3 Consideration has also been given to the guidance contained within the National Planning Policy Framework (NPPF) 2019 and National Planning Policy Guidance (NPPG) 2019 as well as the adopted Supplementary Planning Guidance (SPGs) and Documents (SPDs), which include:
- Housing Supplementary Planning Guidance (GLA, March 2016);
 - DCLG Technical Housing Standards (nationally described space standard) (DCLG, March 2015);
 - Camden Planning Guidance:
 - CPG Design (LB Camden, March 2019);
 - CPG Interim Housing (LB Camden, March 2019);
 - CPG Energy efficiency and adaptation (LB Camden, March 2019);
 - CPG Amenity (LB Camden, March 2018);
 - CPG Transport (LB Camden, March 2019);
 - CPG Developer Contributions (LB Camden, March 2019); and
 - Bloomsbury Conservation Area Appraisal and Management Strategy (LB Camden, April 2011).
- 5.4 The Greater London Authority (GLA) consulted on the Draft New London Plan between December 2017 and March 2018. The GLA further published an updated version of the draft London Plan with minor amendments in August 2018. The examination in public commenced on 15th January 2019 and the final session was held on 22nd May 2019. The GLA published the 'consolidated' version of the draft London Plan in July 2019 and the 'intend to publish' version of the draft London Plan in December 2019. The draft London Plan is a material consideration in planning decisions and the relevant draft policies have been included within the relevant sections of the assessment below.

Site Designations

5.5 The site is subject to the following policy designations within the Local Plan:

- Central London Area;
- Bloomsbury Conservation Area;
- Archaeological Priority Area; and
- Viewing Corridor.

5.6 The site is located adjacent to Islington's New River Conservation Area, with the eastern boundary of the site forming the boundary with LB Islington.

National Planning Policy Framework (NPPF)

5.7 The revised National Planning Policy Framework (NPPF) was published on 19 February 2019. It is the document which sets out the Government's overarching planning policies for England and how they are expected to be applied.

5.8 The overarching principle of the NPPF is a clear presumption in favour of sustainable development. and there is an expectation for local authorities to plan positively for the achievement of high quality and inclusive design for all development.

National Planning Policy Guidance (NPPG)

5.9 The Government has published further advice on the implementation of national planning policies and statutory regulations in the form of online National Planning Practice Guidance (NPPG).

5.10 The following parts of the NPPG are considered to be particularly relevant to the proposal:

- **Air Quality** - the 2008 Ambient Air Quality Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that affect public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2).
- **Community Infrastructure Levy** - is a charge which can be levied by local authorities on new development in their area.
- **Effective Use of Land** – supports more effective use of land.
- **Good Quality Design** – development proposals should reflect the requirement for good design set out in national and local policy. Local planning authorities will assess the design quality of planning proposals against their Local Plan policies, national policies and other material considerations. Local planning authorities are required to take design into consideration and should refuse permission for development of poor design.
- **Historic Environment** - any decisions where listed buildings and their settings and conservation areas are a factor must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as applying the relevant policies in the development plan and the National Planning Policy Framework.
- **Noise** – needs to be considered when development may create additional noise or would be sensitive to the prevailing acoustic environment.

National Design Guide

- 5.11 The National Design Guide was published in October 2019 illustrates how well design places can be achieved in practice. It forms part of the Government's collection of planning practice guidance and is based upon that information found within the NPPF and NPPG.
- 5.12 The Design Guide addresses the question of design in the form of ten characteristics, which cover context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.
- 5.13 Paragraph 40 states that well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary.
- 5.14 Paragraph 42 considers that well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is based on an understanding of the existing situation.
- 5.15 Paragraph 64 refers to build form and states that well-designed new development makes efficient use of land with an amount and mix of development and open space that optimises density. It also relates well to and enhances the existing character and context.
- 5.16 Paragraph 124 states that good design promotes quality of life for the occupants and users of buildings. This includes function – buildings should be easy to use. It also includes comfort, safety, security, amenity, accessibility and adaptability

The London Plan (March 2016)

- 5.17 The London Plan provides overarching planning policy and guidance, which all London Boroughs should comply with. The policies relevant to this application are:
- Policy 3.1 Ensuring life chances for all;
 - Policy 3.3 Increased housing supply;
 - Policy 3.4 Optimising housing potential;
 - Policy 3.5 Quality and design of housing developments;
 - Policy 3.8 Housing choice;
 - Policy 3.9 Mixed and balanced communities;
 - Policy 3.13 affordable housing threshold;
 - Policy 4.2 Offices;
 - Policy 4.3 Mixed use development and offices;
 - Policy 4.10 Mew and Emerging economic sectors;
 - Policy 5.2 Minimising carbon dioxide emissions;
 - Policy 5.3 Sustainable design and construction;

- Policy 5.6 Decentralised energy in development proposals;
- Policy 5.10 Urban greening;
- Policy 5.15 Water use and supplies;
- Policy 5.18 Construction, excavation and demolition waste;
- Policy 6.1 Strategic approach;
- Policy 6.3 Assessing the effects of development on transport capacity ;
- Policy 6.9 Cycling;
- Policy 6.13 Parking;
- Policy 7.2 An inclusive environment;
- Policy 7.4 Local character;
- Policy 7.6 Architecture;
- Policy 7.8 Heritage and archaeology;
- Policy 7.14 Improving air quality;
- Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes;
- Policy 8.2 Planning obligations; and
- Policy 8.3 Community infrastructure levy.

Camden Local Plan (July 2017)

5.18 The Local Plan provides the local planning policy context in which planning applications are determined against. The relevant policies are outlined below:

- Policy G1 – Delivery and location of growth;
- Policy H1 – Maximising housing supply;
- Policy H2 – Maximising the supply of self-contained housing from mixed-use schemes;
- Policy H4 – Maximising the supply of affordable housing;
- Policy H6 – Housing choice and mix;
- Policy H7 – Large and small homes;
- Policy A1 – Managing the impact of development;
- Policy A4 – Noise and vibration;
- Policy C5 – Safety and security;

- Policy C6 – Access for all;
- Policy E1 – Economic development;
- Policy E2 – Employment premises and sites;
- Policy D1 – Design;
- Policy D2 – Heritage;
- Policy TC2 – Camden’s centres and other shopping areas;
- Policy CC1 – Climate change mitigation;
- Policy CC2 – Adapting to climate change;
- Policy CC3 – Water and flooding;
- Policy CC4 – Air quality;
- Policy CC5 – Waste;
- Policy T1 – Prioritising walking, cycling and public transport; and
- Policy T2 – Parking and car-free development.

5.19 The following section will provide a comprehensive assessment of the proposed development against the policies outlined above.

6 ASSESSMENT OF PROPOSED DEVELOPMENT

- 6.1 This section of the Statement seeks to provide a comprehensive assessment of the proposals against the identified local and national planning policies and guidance, and supplementary planning documents and is broken down to address the following matters:

Principle of Development – Mixed Use Development

- 6.2 Policy E1 (Economic Development) of the Camden Local Plan (2017) states that the Council will secure a successful and inclusive economy by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The Council will support businesses of all sizes (in particular SMEs); maintain a stock of premises that are suitable for a variety of business activities and for firms of differing sizes, and encourage the concentrations of professional and technical services and creative businesses. The Council will direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031.
- 6.3 Policy E2 (Employment Premises and Sites) of the Camden Local Plan (2017) outlines that the Council will protect premises or sites that are suitable for continued business use, in particular premises for small businesses or those that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy. They will consider higher intensity redevelopment of premises or sites that are suitable for continued business.
- 6.4 Existing employment sites and premises will be safeguarded that meet the needs of industry and other employers and the Council will welcome proposals for the intensification of employment sites and premises where these provide additional employment.
- 6.5 Policy 3.3 (Increasing Housing Supply) of the London Plan (2016) highlights how Local Authorities should seek to achieve and exceed their housing targets and Policy 3.4 (Optimising Housing Potential) states that development should optimise housing output. The policies emphasise the pressing need for homes in London in order to promote opportunity and provide a real choice for all. Policy 3.5 (Quality and Design of Housing Developments) sets out how new housing should enhance the quality of local places providing a variation in sizes and tenure.
- 6.6 Policy H1 (Maximising Housing Supply) of the Camden Local Plan (2017) confirms the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing.
- 6.7 Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) of the Camden Local Plan (2017) indicates that the Council will require 50% of additional floorspace to be self-contained housing in developments involving more than 200 sq. m (GIA) additional floorspace in the Central London Area and the larger town centres.
- 6.8 Where housing is required as part of a mix of uses, the Council will require self-contained housing to be provided on site, particularly where 1,000 sq. m (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, it will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

- 6.9 Draft Policy D3 (Optimising Site Capacity through the Design-led approach) of the Draft New London Plan (2019) stated that All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.
- 6.10 The Council will consider whether self-contained housing is required as part of a mix of uses taking into account a number of criteria, including:
- the character of the development, the site and the area;
 - site size, and any constraints on developing the site for a mix of uses;
 - whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;
 - the impact of a mix of uses on the efficiency and overall quantum of development; and
 - the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing.

Assessment

- 6.11 Camden's Economic and Employment policies support the provision of additional employment floorspace and the intensification of existing employment uses, particularly where they support small businesses, and concentrations of professional, technical and creative businesses. Therefore, the principle of additional B1 floorspace is considered to be acceptable.
- 6.12 The site's existing lawful use is as offices (Class B1) and it is occupied by SEH along with a wide variety of SMEs and start-ups companies in a dynamic co-working environment. The proposed development seeks permission to upgrade the existing facilities and to provide a high-quality space that will meet the needs of modern businesses and encourage innovation.
- 6.13 Policy E1 supports the delivery of office floorspace in Central London location. The uplift in office floorspace will contribute toward the identified 695,000sqm of new office floorspace in the policy. Therefore, the provision of additional office floorspace is considered acceptable in principle.
- 6.14 Policy H2 seeks the provision of self-contained homes as part of non-residential development, it is considered that the provision of residential dwellings as part of the development would be appropriate in this CAZ area.
- 6.15 The total uplift on floorspace from the scheme would be 664 sq. m, of which 306 sq. m would be office (46%) and 358 sq. m residential (54%) uses. The proposed residential floorspace exceeds the requirement threshold of 50% outlined in Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) of the Camden Local Plan.
- 6.16 The adopted policy supports the provision of new office accommodation and residential units in highly accessible locations in the CAZ.

- 6.17 Furthermore, the pre-application discussions with the Council confirmed that the provision of additional office and co-working floorspace was acceptable.
- 6.18 The proposed development therefore complies with Policy E1, E2, H1 and H2 of the Camden Local Plan (2017), and the principle of a mixed-use development on the site is acceptable.

Design and Heritage

- 6.19 Paragraph 17 of the NPPF details within its core planning principles that new development should seek to enhance and improve the health and wellbeing of places in which people live their lives. Chapter 7 of the NPPF outlines that planning decisions should aim to ensure that developments function well and add to the overall quality of an area not just for the short term, but over the lifetime of the development.
- 6.20 Policy 3.5 (Quality and Design of Housing Developments) of the London Plan (2016) outlines the need for a new housing development to be designed in a way that enhances the quality of local places. Furthermore, Policy 7.2 (An Inclusive Environment) and 7.4 (Local Character) state the need for developments to achieve the highest standards of accessible and inclusive design with regard to the pattern and grain of the existing spaces.
- 6.21 Policy 7.8 (Heritage Assets and Archaeology) of the London Plan (2016) provides the relevant policy with regards to development in historic environments and seeks to record, maintain and protect the city's heritage assets in order to utilise their potential within the community. It goes on to state that 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail
- 6.22 The Draft London Plan (2019) Policy D1 (London's Form, Characteristic and Capacity for Growth) states that development should be of high-quality design which responds to the local context of the area and use land efficiently by optimising density, connectivity and land use patterns.
- 6.23 Policy D1 (Design) of the Camden Local Plan (2017) outlines that the Council will seek to secure high quality design in development that:
- respects local context and character through high quality details and materials;
 - preserves or enhances the historic environment and heritage assets; and
 - integrates well with the surrounding streets and open spaces; and preserves strategic and local views.
- 6.24 The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 6.25 Policy D2 (Heritage) of the Camden Local Plan (2017) outlines that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings and archaeological remains. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

- 6.26 The Design CPG (March 2019) outlines the following matters should be considered to achieve high quality design:
- The context of a development and its surrounding area;
 - The design of the building itself;
 - The use and function of buildings;
 - Using good quality sustainable materials;
 - Opportunities for promoting health and well-being; and
 - Opportunities for improving the character and quality of an area.
- 6.27 The Design CPG (March 2019) states that the Council will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset/s affected, taking account of:
- The desirability of sustaining and enhancing the significance of any heritage asset/s and putting them to viable uses consistent with their conservation;
 - The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality and health and wellbeing; and
 - The desirability of new development that affects heritage assets to preserve and enhance local character and distinctiveness.

Assessment

- 6.28 The site is located within in the Bloomsbury Conservation Area, situated within Sub Area 14 (Calthorpe Street/Frederick Street), this sub-area is characterised by a mixture of development dating from the eighteenth century onwards, though predominantly nineteenth century built-form and residential in character. The Site is in close proximity to a number of designated and non-designated heritage assets which include listed buildings and the New River Conservation Area.
- 6.29 The collection of buildings on site contains a mixture of different historic fabrics, with materials from different periods of construction, characterised by exposed brick, steel, wood and modern finishes.
- 6.30 As detailed within the accompanying Design and Access Statement, the proposal is to convert number 69 to create four new residential units with an upward extension to deliver additional office floor space. The additional storeys and the infilling of the existing courtyard will be modern and set slightly back from the existing building lines to clearly differentiate between the existing and modern elements and to respect the character of the existing building and neighbouring properties.
- 6.31 The upward extension will help remediate the 'gap' which currently exists in the urban form between the Victorian terrace to the south and the twenty first century development to the north.
- 6.32 The massing of the upper storeys is broken into three sections comprised of two roof extension structures sitting above historic buildings, and a recessed 'shadow gap' volume that occupies the courtyard. The rear extension to the South is set back from the site boundary and has angled corners to minimise detrimental impact to neighbouring properties in terms of daylight and sunlight.

- 6.33 The design of the proposed development ensures the top floor extensions will not dominate the street scene or have a negative impact on the significance of the site or surrounding heritage assets. Furthermore, the use of a set back to the infill extension to the existing courtyard will help to maintain the legibility of its open and subordinate nature.
- 6.34 The structure of the proposed extension will be designed so that it is not detrimental to the existing fabric of No 65 in order to protect any retained internal historic features, which the timber roof structure of No. 65 is retained by creating a void between the existing building and the proposed upwards extension.
- 6.35 The extension to No. 65 will utilise a 'warm colour' beam frame with Corten finish, whilst the extension to No. 69 will utilise a warm grey finished aluminium cladding. The proposed use of materials for the building will complement the surrounding buildings and streetscape.
- 6.36 There will be minor alternations to the existing elevations to the building, involving the replacement of windows to the front elevation of No. 65 with slim box section thermally broken steel windows. Each window in the existing front elevation is divided into two, with one half a fully glazed fixed light, paired with opaque perforated panels, which have opening panels behind for ventilation. The existing external brown bricks on the building will be cleaned and retained, in order to maintain the existing design and character.
- 6.37 The accompanying Built Heritage Statement advises that the proposals will provide an opportunity to enhance the site by revealing more of its features of historic and architectural interest. In addition, located on a bend in Kings Cross Road, the site represents a gap in the existing building line between the end of the historic Victorian terrace to the south and the 21st Century buildings to the north, and the proposal provides the opportunity for an improved design response to this frontage and to introduce modern, but complementary, elements.
- 6.38 Furthermore, the Built Heritage Statement confirms that the scale and massing of new development responds to its context in an appropriate way. Whilst the proposed development would cause a negligible degree of harm to the conservation area through some erosion of the legibility to the courtyard, the overall upgrade of the building will deliver positive benefits that will sustain and respects the historic environment. It also confirms that the proposed development would preserve the character and appearance of the conservation area and comply with section 72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990.
- 6.39 The site is located within an Archaeological Priority Area; however, the proposed development only involves change of use and upward extension, which will not involve any basement development or foundation works. Therefore, the proposed development will not have any archaeological impacts.
- 6.40 Pre-application discussions confirmed that the height massing, materials and detailed design of the proposal is acceptable.
- 6.41 As such, the proposed development complies with Policy D1 and D2 of the Camden Local Plan (2017) and the Camden Design CPG. The proposed development is therefore considered to be acceptable and would improve the visual appearance of the site and the wider area from a design perspective. It is therefore considered that the site has the potential to accommodate increased height and modern extension without adversely impacting on the quality of the existing buildings or the surrounding character and heritage assets.

Affordable Housing

- 6.42 Policy 3.11 (Affordable housing targets) of the London Plan (2016) outlines that the Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision. Policy H4 (Delivering Affordable Housing) of the Draft London Plan seeks 50% of all new homes delivered across London to be affordable.
- 6.43 Policy H4 (Maximising the Supply of Affordable Housing) of the Camden Local Plan (2017) states that a sliding scale target is applicable to developments of 25 or fewer units, starting at 2% at one home and increasing by 2% of for each home added to capacity. It states that the Council will accept a payment-in-lieu for developments of 10 or fewer units. Alternatively, the affordable housing should be provided on site for developments with the capacity for 10 or more units. Offsite affordable housing or payment-in-lieu may be accepted if on site provision is not practical.
- 6.44 It is noted that in the Interim Housing CPG (March 2019) provides detailed guidance on payments-in-lieu for affordable housing contribution, whilst the Developer Contribution CPG (March 2019) confirms affordable housing contributions will be secured through section 106 agreements. It confirms the payment in lieu figure shortfall of affordable housing in a mixed-use development is £2,650.00 per sq. m GEA.
- 6.45 The Interim Housing CPG (March 2019) stated that the Council will use the assessment of capacity and the sliding scale to determine the affordable housing percentage target. The sliding scale is a simple straight-line scale starting with a 2% affordable housing target for a development that has capacity for one additional home.

Assessment

- 6.46 The proposed development will provide four new residential units at No. 69 King's Cross Road through change of use and upward extension. Policy confirms the provision of onsite affordable house is not required for developments comprising four new residential units and that the Council will accept a payment-in-lieu of affordable housing.
- 6.47 The payment-in-lieu of affordable housing for the proposed development complies with Policy H4 of the Camden Local Plan (2017) and is therefore considered acceptable. The payment in-lieu will be calculated in line with the Interim Housing CPG and on the basis of 8% affordable housing using GEA floorspace.

Residential Standards

- 6.48 London Plan (2016) Policy 3.8 (Housing Choice) and Policy 3.9 (Mixed and Balanced Community) seek to ensure that new developments offer a range of house sizes and tenures, whilst Policy H6 (Housing Choice and Mix) and Policy H7 (Large and Small Homes) of the Camden Local Plan (2017) seek a mix of housing types for which the exact mix will vary according to the location of the development and character of the surrounding area.
- 6.49 Policy 3.4 (Optimising Housing Potential) of the London Plan emphasises development should optimise housing output for different types of location within the relevant density range, promoting the efficient use of land. The current proposal seeks to replace the existing office building with four new units of accommodation and intensifying the existing office building.

- 6.50 The London Plan seeks to optimise land use and contains a density matrix which sets a strategic framework for appropriate densities at different locations. Furthermore, Policy G1 (Delivery and Location of Growth) of the Camden Local Plan (2017) states that with new residential developments, the Council will support development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 6.51 Draft Policy D3 (Optimising Site Capacity through the Design-led approach) of the Draft New London Plan (2019) stated that All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.
- 6.52 Policy H1 (Maximising Housing Supply) of the Camden Local Plan (2017) emphasises to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding the target. The Council seeks the maximum appropriate provision of housing on each site while maintaining residential quality, taking account of public transport accessibility, respecting local context and ensuring an appropriate mix of homes of different sizes, based on the London Plan's Sustainable Residential Quality density matrix. Table 3.2 (Density Matrix) of the London Plan (2016) outlines that the appropriate density levels for proposed development is positively correlated to the PTAL of the site.
- 6.53 Policy H6 (Housing Choice and Mix) of the Camden Local Plan (2017) states that high quality accessible homes in all developments are essential, and 10% of units are to be suitable for occupation or easily adapted for occupation by a wheelchair user. The policy also outlines the Council is determined to secure a variety of housing products in all sectors to meet the needs across all households.
- 6.54 The Policy also expects all self-contained homes to be high quality designed and meet the nationally described space standard. It outlines the aspects of quality include the external environment, the condition of the property and its state of repair and decoration, accessibility, internal space and number of bedrooms, separation between functions such as kitchens, living rooms and bedrooms, adequate noise insulation, and daylight and sunlight and all of which can affect physical and mental health and influence life chances.
- 6.55 Policy H7 (Large and Small Homes) of the Camden Local Plan (2017) outlines that new developments should provide a mix of unit sizes and emphasises the specific need of two- and three-bedrooms homes in both the market and affordable sector.

Table 1: Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

Camden Local Plan (2017) Table 1 – Dwelling Size Priorities

- 6.56 Policy A2 (Open Space) of the Camden Local Plan (2017) states that the Council ensure developments seek opportunities for providing private amenity space.
- 6.57 The Amenity CPG (March 2018) states that developments should be designed to protect the privacy of occupiers of both existing and proposed dwellings, and developments should be carefully designed to avoid overlooking. To ensure privacy, it is good practice to provide a minimum distance of 18m between the windows of habitable rooms in existing properties directly facing the proposed development. Mitigation measures should be incorporated where a separation distance of 18m cannot be achieved, such as the use of soft landscaping as privacy screens.
- 6.58 The Interim Housing CPG (March 2019) confirms that the space standard should comply with the Nationally Described Space Standard requirements, which dual aspect should be achieved for all proposed developments. In addition, a range of affordable and suitably sized properties in a range of tenures is required.
- 6.59 In addition, this guidance requires all habitable rooms must have direct natural light, particularly the main living room, which the levels of daylight and sunlight that enter habitable rooms must comply with BRE standards. Good dual aspect should also be achieved for new residential developments, providing suitable outlook for habitable rooms.
- 6.60 In addition, it expects applicants to consider the impact of development schemes on daylight and sunlight levels. The policy also states that the 45 degree and 25 degree tests cited in the BRE guidance should be used to assess whether a sunlight and daylight report is required.
- 6.61 Finally, the Interim Housing CPG (March 2019) states that all new homes should have access to some form of private outdoor amenity space, whilst the Public Open Space CPG (March 2018) confirms the quality and amount of private amenity space that should be provided is set out in the Mayor of London's Housing Supplementary Planning Guidance. Standard 26 of the London Housing SPG (2016) requires A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.

Assessment

- 6.62 The accompanying Design and Access Statement. prepared by SEH provides full details on the proposed accommodation standards.

Density

- 6.63 The site is in a highly accessible central location with a PTAL of 6b, representing an excellent accessibility level. Policy H1 (Maximising Housing Supply) of the Camden Local Plan (2017) and Table 3.2 (Density Matrix) of the London Plan (2016) support a high-density development in this urban context due to its excellent accessibility level.
- 6.64 The Council confirmed the wider area is generally well served by public transport, and as such will generally expect densities towards the higher end of the appropriate density range in the matrix, subject to taking into account all aspects of local character including heritage assets, protected views and open spaces and having regard to the boroughs acute housing needs. Policy H1 (Maximising Housing Supply) of the Camden Local Plan (2017) and Table 3.2 (Density Matrix) of the London Plan (2016) support a high-density development in this urban context due to its excellent accessibility level.

- 6.65 Given the site's high public transport accessibility, that policy outlines the site's potential should be optimised and that the proposed height and detailed design is appropriate, the proposed density is considered to be appropriate for this urban location.
- 6.66 Furthermore, the proposals would contribute four new residential units on the site and would optimise the existing land use. It complies with both London Plan and local planning policy; the density of the development is considered appropriate for the character of the area. As such, the proposed density is acceptable in this regard.

Unit Mix

- 6.67 The proposed development comprises a partial conversion of the No. 69 to provide four new units of residential accommodation, comprised of one no. studio unit, one no. 1 bedroom unit and two nos. 2 bedrooms units.
- 6.68 The proposed development will provide a suitable mix of dwellings on the site and would make efficient use of the land. The delivery of two bedrooms units is account for 50% of total proposed units. The proposed unit mix is considered acceptable in this urban context and complies with the Council's unit mix preferences outlined in Policy H7.
- 6.69 The number and layout of the units were agreed with officers over the course of the pre-application discussion and considered to be appropriate given the constraints of adopting on existing building.
- 6.70 The four additional units of accommodation would all meet the required internal space standards. As such, the four proposed residential units will make efficient use of the land and therefore is acceptable in this regard.

Layout and Quality of Accommodation

- 6.71 The proposed residential units will provide private amenity space for all units in the form of balconies and terrace, as outlined in the table below:

Floor Level	Unit Type	Recommended Amenity Space Area	Proposed Amenity Space
1	2 Bed 3 Person	5.0 sq. m	Balcony (6.9 sq. m)
2	Studio	5.0 sq. m	Balcony (4.7 sq. m)
2	1 Bed 2 Person	5.0 sq. m	Balcony (5.3 sq. m)
3	2 Bed 4 Person	7.0 sq. m	Terrace (11.1 sq. m)

Table 6.1: Proposed Private Residential Amenity Space Details

6.72 Whilst the balcony of the Studio Unit is marginally below the Private Open Space standards outlined in Standard 26 of the London Housing SPG (2016), this is due to the constraints of converting an existing building to residential and providing an appropriate internal environment. The layout in type of accommodation has been discussed and agreed with Officers as appropriate for this urban context. Nevertheless, all units comply with the Nationally Described Space Standard for overall unit and bedroom sizes.

6.73 Access to the residential units will be via a separate entrance via no. 69 King's Cross Road.

Privacy and Overlooking

6.74 The existing openings front the internal courtyard at No. 69 King's Cross Road now relate to the residential units. These openings are replaced with new steel framed windows with obscured and acoustically rated glazing, which the units can will receive daylight from the new atrium without loss of privacy and noise impacts.

6.75 It is therefore considered the proposed replacement of windows will not lead to unacceptable loss of privacy or level of overlooking. The overall proposal will not adversely affect the amenity for the future occupiers at No. 69 King's Cross Road.

Internal Daylight & Sunlight

6.76 The submitted Internal Daylight and Sunlight Report confirms that the level of daylight for the residential units is either in line with or above guidance for Average Daylight Factor, with a number of rooms significantly exceeding the minimum recommendations.

6.77 In addition, eight of the nine rooms would either meet or exceed BRE's recommendation for No Sky Line, thus providing good levels of sky visibility. Whilst one room marginally falls short of the recommended standard, this is considered to be appropriate given the site's urban location, and the constraints of the conversion to an existing building.

6.78 As such, all rooms have been designed in accordance with BRE's Room Depth Criterion and the proposed development offers excellent daylight amenity for its future occupants.

Neighbouring Amenity

6.79 Paragraph 17 of the NPPF details that new development should seek to enhance and improve the health and wellbeing of the places in which people live their lives. Furthermore, Policy 7.2 of the London Plan emphasises the need for developments to be inclusive and provide healthy environments in which individuals are comfortable within.

6.80 Policy 7.6 (Architecture) of the London Plan (2016) seeks to ensure developments do not cause harm to the amenity of the surrounding area specifically residential buildings in relation to privacy and overshadowing. Policy 7.15 (Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes) emphasises how development proposals should seek to mitigate and minimise any noise impacts.

6.81 Policy A1 (Managing the Impact of Development) of the Camden Local Plan (2017) outlines the Council will seek to protect the quality of life of occupiers and neighbours. The Council will expect development to avoid harmful effect on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative

impacts. The Council will consider visual privacy, outlook, sunlight, daylight, overshadowing artificial lightings levels, noise and vibration levels, odour, fumes and dust.

6.82 Policy A4 (Noise and Vibration) of the Camden Local Plan (2017) seeks to ensure that noise and vibration is controlled and managed.

6.83 The Air Quality CPG (March 2019) outlines the different categories in assessing the air quality in LB Camden. The guideline states that an assessment may be required to be submitted for demolition and construction impacts for certain minor applications, which the construction should adopt best practice measures to reduce and mitigate emissions.

6.84 The assessment is required to demonstrate the impacts on air quality of the demolition and construction phase and details of mitigation methods for controlling dust and emissions from plant and machinery.

Assessment

6.85 The site is in an urban location which has an established historic pattern of infill development and intensification.

6.86 The amenity of the neighbouring dwellings has been a key consideration in the evolution of the design and was discussed with Officers over the course of the pre-application discussion.

External Daylight & Sunlight

6.87 An External Daylight and Sunlight Report, prepared by GIA, has been submitted as part of this application. The report outlines that an assessment has been carried out to all the relevant residential surrounding properties along surrounding the development site.

6.88 The assessment confirms that the proposed development demonstrates that the surrounding properties will experience a high level of compliance with the daylight criterion. In addition, 98.3% of all windows assessed meet the suggested BRE values for VSC and 73.2% of all rooms assessed meet the suggested BRE values for No Sky Line based on our current assumptions. The sunlight criterion demonstrates a very good rate of compliance (98.4%).

6.89 As such, the overall external daylight and sunlight effects complies with Policy A1 of the Camden Local Plan (2017) and will not lead to a marginal loss of daylight and sunlight to the residential properties. It is therefore considered appropriate given the urban context of the site.

Privacy and Overlooks

6.90 The proposal has been sensitively designed to safeguard the privacy of adjoining occupiers. The accompanied Design and Access Statement, prepared by Shephard Epstein Hunter, outlines the building distance between the site and the surrounding buildings. The separation distance on King's Cross Road is approximately 20 m, whilst the separation to No. 16 Cubitt Street is 16 m.

6.91 In addition, the proposed development involves the installation of 5 new window openings to the west elevation of the building on the second floor. Whilst the separation distances would be marginally less than the 18 m requirement outlined in the Amenity CPG (March 2018), this is considered acceptable given that site's urban location and the existing relationship established between the west elevation of No. 65 and No. 16 Cubitt Street.

- 6.92 Furthermore, separation distance between the buildings has been discussed with Officers and agreed with as appropriate for this urban context, as it would not constitute undue harm.
- 6.93 The proposed residential units at No. 69 King's Cross Road will contain one new window opening to the north western elevation on the second floor. There are existing windows on this elevation at the first floor, therefore any new window will be in-line with this existing relationship with No. 71 King's Cross Road. Furthermore, this proposed window opening on the second floor replaces one of the two existing windows at first floor on the same elevation, and as such it will not lead to any unacceptable loss of privacy or overlooking to No. 71 King's Cross Road.
- 6.94 It is therefore considered the proposed enlargement and replacement of windows will not lead to unacceptable loss of privacy or level of overlooking. The overall proposal will not adversely affect neighbouring amenity.

Acoustics

- 6.95 A separate Acoustic Report, prepared by KP Acoustics Ltd, has also been submitted as part of this application. The report outlines that a Noise Impact Assessment was undertaken on site in accordance with BS4142:2014 as part of the planning requirements of the LB Camden.
- 6.96 The report outlines the methodology and results from the assessment, indicating the likelihood of the noise emissions from the following proposed plant units installation with mitigation measures:
- Two x Nuaire XBC85-H-NES Heat Exchange Units; and
 - One x Helios Gigabox GBW EC 400 B WC Extraction Fan.
- 6.97 The assessment utilised the manufacture's noise data of the proposed plant units to obtain Specific and Rated Noise Level at the nearest noise sensitive receiver, and this rating level was compared with the representative background noise level to assess the likelihood of noise impacts.
- 6.98 Provided that noise mitigation measures are installed as detailed within the report, the assessment confirms the noise emissions from the proposed plant units would have a negligible effect on the amenity of the nearest residential receivers.
- 6.99 The proposed plants and mitigation strategies comply with Policy A1 and A4 of the Camden Local Plan (2017) together with the Amenity CPG (March 2018), which is therefore considered acceptable.

Environmental Health

- 6.100 An Air Quality Assessment, prepared by DustScanAQ, has been submitted as part of this application, provides an assessment on the key issues associated with the construction and operational phases of the proposed redevelopment.
- 6.101 Mitigation measures have been recommended for the construction phase of the proposed development and the impacts from the construction phase of the proposed redevelopment on dust soiling and human health have been considered to be not significant.
- 6.102 The Assessment confirms the proposed redevelopment is considered to be air quality neutral with regards to building emissions. It is therefore concluded that the proposed redevelopment is not considered to conflict with national, regional and local planning guidance.

Transport

- 6.103 Policy 6.1 (Strategic Approach) of the London Plan (2016) highlights the importance of transport and development integration. This is furthered by Policy 6.3 (Assessing Effects of Development on Transport Capacity) which requires development proposals to ensure that impacts on transport capacity and the transport network are fully assessed. Policy 6.9 (Cycling) of the London Plan (2016) requires developments to provide secure, integrated, convenient and accessible cycle parking facilities. The Camden Local Plan (2017) Policy T1 (Prioritising Walking, Cycling and Public Transport) supports this requirement as well.
- 6.104 Draft Policy T6 (Car Parking) of the Draft London Plan (2019) states that car-free development should be the starting point for all development proposals, in places that are well-connected by public transport. Table 10.3 of the Draft Policy T6.1 (Residential Parking) of the Draft London Plan (2019) states that all areas with a PTAL 5-6 should not provide any residential parking provision.
- 6.105 Policy T1 (Prioritising Walking, Cycling and Public Transport) of the Camden Local Plan (2017) outlines that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. Accessible, secure cycle parking facilities should exceed minimum standards outlined within the London Plan and design requirements outlined within the Council's supplementary planning document on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development.
- 6.106 Policy T2 (Parking and Car-Free Development) of the Camden Local Plan (2017) outlines the Council will limit the availability of parking and require all new developments in the borough to be car-free, will not issue on-street or on-site parking permits in connection with new developments and will limit on-site parking to disabled people and essential operational or servicing needs.
- 6.107 The Transport CPG (March 2019) state that the Council expects all new residential development to be car-free, including redevelopments (and changes of use) with new occupiers. The Council will consider some parking provision where it is demonstrated that this is essential to the use, operation and/or servicing of the use, business or service for non-residential development.
- 6.108 Table 6.3 of the London Plan (2016) states that development should provide cycling space at the level of 1.0 per studio or one bedroom, and 2.0 per all other dwellings.
- 6.109 Policy T5 (Cycling) of the Draft London Plan (2019) outlines the minimum cycling parking standards, requires 1.0 space per studio or 1-bedroom unit, and 1.5 spaces per all other dwellings for long-stay, with 2 spaces per for 5-40 units for short-stay. The policy also requires 1 space per 75 sq. m of business office space (use class B1) in areas with higher cycle parking standards for long-stay, with 1 space per 500 sq. m for the first 5,000 sq. m of business office space (use class B1) for short-stay.
- 6.110 The Transport CPG (March 2019) states that the Council will seek high quality cycle parking facilities for developments, requiring the provision, as a minimum, the quantity of cycle parking spaces requirement as set out in the London Plan.
- 6.111 It also outlines the design standards for the cycle standings, which the stands should be provided as per the TfL's London Cycling Design Standards. The Council will accept the provision of either the CaMden M or Sheffield stands.

- 6.112 The Amenity CPG (March 2018) requires the provision the technical specifications of any proposed external plants to the Council accompanying any acoustic report to be assessed against the 'BS4142 Method for rating Industrial and Commercial Sound' guidance. This CPG also requires a Construction Management Plan to be submitted after planning permission is granted and to include significant input from the contractor(s) appointed to undertake the work, addressing transport/highways and environmental health impacts.

Assessment

Vehicle Parking

- 6.113 The site is served by a number of bus routes and within walking distance of King's Cross St. Pancras Underground Station, King's Cross Railway Station and St. Pancras International Railway Station. As such, the site contains a PTAL of 6b, representing an excellent level of public transport accessibility. The proposal will therefore be car free.
- 6.114 This arrangement is in-line with Policy T2 (Parking and Car-Free Development) of the Camden Local Plan (2017) and Draft Policy T6 (Car Parking) of the Draft London Plan (2019), which requires new developments to be car free. It is therefore considered that car free development is appropriate in this highly accessible Central London Location.
- 6.115 The proposed vehicle parking arrangement is therefore considered to be acceptable.

Cycle Parking

- 6.116 Based on the Draft London Plan, the residential cycling parking requirement has been calculated at five spaces (1.0 space x two studio / 1 bed flats + 1.5 spaces x two 2 bed flats), whilst the provision of short-stay cycle spaces is not required, as the policy required the provision of two short-stay cycle spaces for 5 to 40 dwellings.
- 6.117 The proposed residential development will provide seven cycle spaces in a secure store at ground floor level, which exceeds the requirement outlined in Policy T5 (Cycling) of the Draft London Plan (2019).
- 6.118 The commercial scheme proposes an uplift in floorspace of 306 sq. m. Based on Policy T5 (Cycling) of the Draft London Plan (2019), the cycling parking requirement has been calculated at 5 (4.69) spaces (1.0 long-stay space per 75 sq. m for 306 sq. m + 1.0 short-stay space per 500 sq. m for 306 sq. m) which will be provided in the existing basement cycle store.
- 6.119 As such, the proposed development complies with Policy T5 of the Draft London Plan (2019) and Policy T1 of the Camden Local Plan (2017), and the proposed cycle parking provision is considered to be acceptable.

Construction Period

- 6.120 A Draft Construction Management Plan, prepared by Jerram Developments, has been submitted as part of this application. The Plan sets out a framework for the Principal Contractor responsibilities with regard to compliance with legislation and the implementation and monitoring of mitigation measures for the application at Nos. 65-69 King's Cross Road.

- 6.121 Therefore, it is considered that the application has provided sufficient information at this stage to demonstrate that demolition and construction will be undertaken without significant detrimental impact on neighbouring users and occupiers.
- 6.122 The proposal is sensitively designed to protect the amenity of surrounding residents. It is considered that the building comprises a high-quality sympathetic design compliant with the aims of local and London policy. The impact on neighbouring amenity is therefore considered to be acceptable.
- 6.123 The construction management arrangement complies with the Amenity CPG (March 2018) and is therefore considered to be acceptable.

Waste Management

- 6.124 The London Plan (2016) Policy 5.3 (Sustainable Design and Construction) seeks to ensure that the highest standards of sustainable design and construction are achieved and seeks to ensure minimisation of the generation of waste and maximisation of reuse and recycling. The housing SPG requires that the storage facilities for waste and recycling containers should be provided in accordance with local authority requirements.
- 6.125 Policy CC5 (Waste) of the Camden Local Plan (2017) requires new residential developments to provide adequate facilities for recycling and the storage and disposal of waste.
- 6.126 The Design CPG (March 2019) states that waste storage areas in new developments should be designed to provide adequate space for the temporary storage of all types of waste that is safely located and accessible for all users, which it should also be sufficiently flexible to accommodate future increases in recycling targets. In addition, the CPG sets out guidelines for developers in relation to the design and location of waste storage areas for commercial and residential waste storage and collection, emphasising commercial units should have an independent waste and recycling store and this must be separate from any residential bin stores.
- 6.127 Finally, the Design CPG confirms The Council currently offers waste collection of the following minimum volumes per dwelling with three bedrooms or less, per week:
- 120 litres of bin, box or sack volume for general waste or 'refuse';
 - 140 litres of mixed dry recycling; and
 - 23 litres of food waste.

Assessment

- 6.128 The proposed residential scheme at No. 69 King's Cross Road will provide a dedicated bin store area on the ground floor for the storage of waste from the four new residential units. A total of 16 individual bins / caddies will be provided in the following arrangement:
- Four x 120 litres of General Waste Bins;
 - Four x 140 litres of Recycling Waste Bins; and
 - Four x 23 litres of Food Waste Kerbside Caddies.
- 6.129 The total capacity of the proposed residential bin storage is in line with Section 8 of the Design CPG (March 2019).
- 6.130 Waste collection is to be managed following the same principles as per the existing arrangements, in accordance with the existing agreement with LB Camden for kerbside collection. Bagged non-recyclable waste is left out on the pavement every weekday evening for collection the following morning, whilst recyclable waste approximately is to be collected bi-weekly, as required.
- 6.131 A commercial cleaning company will attend every evening to empty waste bins and sort waste into separate bags for recyclable and non-recyclable for the commercial scheme. An onsite storage area will be provided to store bagged recyclable wastes prior to collection, a locker room on ground floor would perform the same purpose as a dedicated bin store for the commercial scheme. The provision of an enlarged locker room would be sufficient to serve this purpose and it is therefore considered acceptable.
- 6.132 The overall waste management arrangement complies with Policy CC5 of the Camden Local Plan (2017) and is therefore considered acceptable.

Community Infrastructure Levy

- 6.133 London Plan Policy 8.2 states that when considering planning applications planning contributions will be sought where appropriate. Policy 8.3 states that the effective development and implementation of CIL should be maintained in all cases.
- 6.134 The Developer Contribution CPG (March 2019) confirms that CIL will be applied to all proposals adding 100 sq. m. or more of new floorspace or an extra new dwelling.
- 6.135 The Mayor of London's Community Infrastructure Levy 2 (MCIL2) came into force on 1st April 2019 and is chargeable in line with the CIL Regulations in respect of all development (other than those uses attracting a £Nil rate) in Camden at a rate of £80.00 per sq. m (GIA), excluding the development for office, retail and hotel in Central London area. In addition, the development site is also subject to an additional MCIL2 Central London charge for office developments a rate of £185.00 per sq. m (GIA).
- 6.136 Camden CIL came into effect on 1st April 2015 and payment is made by a developer to the Council per square metre of new floor space. The site is located within Camden Charging Zone A where residential development is charged at £500 per sq. m, whilst office is charged at £45 per sq. m.
- 6.137 The relevant CIL information form has been included with the submission of this planning application.

Summary

- 6.138 The proposed development has been carefully considered to respect the existing historic character and adjoining occupiers. The proposal has been developed through detailed discussions with Officers through the pre-application process.
- 6.139 The comprehensive assessment in this statement provides an evaluation against the identified local and national planning policies and guidance, and supplementary planning documents, which is concluded in the following section.

7 CONCLUSIONS

- 7.1 The application site comprised of three interconnected buildings arranged around a small shared courtyard at nos. 65-69 King's Cross Road. The surrounding area is characterised by a mix of Victorian era residential properties and modern buildings of varying sizes and designs, ranging from three to nine storey in height.
- 7.2 This Statement has been prepared in support of a planning application which seeks an increase in floor area of the buildings through provision of additional floors and the infill of the existing courtyard area to form a new internal office atrium.
- 7.3 The proposed development will provide a mixed-used development, comprising four residential units and additional office floorspace, of a high-quality design in line with the Council's policies that will complement the character of the surrounding area. The delivery of additional office space and residential units is considered acceptable in principle within this Central Activity Zone, and as the site benefits from excellent public transport accessibility.
- 7.4 The area has an established historic pattern of infill development and intensification, which the design of the upward extension has been carefully considered and set back to respect the existing character and building heights in the area and to safeguard heritage assets including the Bloomsbury Conservation Area. The design of the extension clearly differentiates between the existing and modern buildings, which it will help remediate the 'gap' which currently exists in the urban form between the Victorian terrace to the south and the twenty first century development to the north.
- 7.5 The proposed materials for the extension utilise contemporary cladding material and window openings based on the elevational grid of the existing building, which will complement the historic character of the adjoining buildings within the Bloomsbury Conservation Area. During the pre-application discussion, the Officers confirm the proposed upward extension and infill was considered acceptable in this urban context.
- 7.6 The proposed development demonstrates a careful consideration and mitigation strategy in terms of the relationship with the neighbouring properties and as such it will not adversely impact upon the amenities of the neighbouring properties and the further occupiers at No. 69 King's Cross Road.
- 7.7 Overall, the proposal comprises a sustainable form of development that will provide additional office and residential floorspace that will contribute serving the needs of a wide variety of local businesses and residents of the London Borough of Camden, whilst not impacting upon the surrounding properties in an adverse manner.
- 7.8 It is therefore considered that the proposed development is in accordance with planning policy.