

**Town Planning Statement**  
**Belgrove House, Belgrove Street, London WC1H 8AA**

On behalf of Precis Advisory & Access Self Storage Ltd  
Date: 21st August 2020

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A	Letter from MSD
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# 1 Executive Summary

- 1.1 This Planning Statement (hereafter referred to as ‘the Statement’) provides a comprehensive review of relevant national, regional and local planning policy in relation to the Belgrove House application proposals. It sets out the planning justification for the Proposed Development and contains a detailed assessment in relation to relevant development plan policies and other material planning considerations and the statutory duties in respect of the historic environment.
- 1.2 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act (2004) comprises: the London Plan (including minor alterations adopted in March 2016), and the Camden Local Plan (adopted in July 2017). The National Planning Policy Framework (the NPPF), published in June 2019 is a material consideration, along with relevant supplementary planning policy guidance.
- 1.3 The application proposals brought forward by Access Self Storage Ltd & Precis Advisory, the applicant, are for a specialised life-sciences, laboratory-enabled building in the heart of the Knowledge Quarter. The applicant has agreed commercial terms with MSD subject to planning permission being granted to occupy the whole building as its new UK Headquarters and Discovery Centre. MSD are one of the top five biopharmaceutical companies in the UK and currently employ over 2,000 people across five sites. They specialise in research, development and supply of new medicines and vaccines that prevent and treat diseases that occur at every stage of life.
- 1.4 The proposed scheme brings an extensive package of transformational benefits which follows the Government’s ambition to reinforce the UK and London as a global centre for research and technological advances. The scheme would also meet LB Camden’s ambitions for a successful Knowledge Quarter which directly improves the lives of local communities in which the development sits, economically, socially and environmentally.
- 1.5 This Planning Statement is submitted in support of a detailed planning application for the demolition and redevelopment of Belgrove House, Belgrove Street, London WC1H 8AA (the “Site”) to provide a new part ground plus nine storey and part ground plus 4 storey commercial development with two basement levels for use as an office and research and development headquarter building for the life sciences sector. The building incorporates a publicly accessible ground floor including a café and retail floorspace, an auditorium and

events space and a step-free entrance to King's Cross London Underground Line (LUL) in place of the two existing tube boxes on Euston Road. The applicant is also proposing high quality landscaping on Belgrove Street, Crestfield Street, Euston Road and St Chad's Street which will be secured by legal agreement attached to the planning application. The proposed building has been designed by Stirling Award winning architects, Allford Hall Monaghan Morris (AHMM) who have extensive experience of working in Camden e.g. The Post Building and The Google Building at 6 Pancras Square. The public realm has been designed by Bradley-Hole Schoenaich Landscape who designed the landscaping for the new King's Cross Square.

- 1.6 Belgrove House is a low 1930s brick building with a flat roof and large floor plate currently used as a storage facility. In the formal feedback received during pre-application meetings, Historic England described the existing building as "architecturally uninspiring" and, in our opinion, it presents a disappointing frontage to the new King's Cross Square, the Grade I listed King's Cross and St Pancras Chambers which sit opposite the site and the new King's Cross masterplan which has been developed within the King's Cross Opportunity Area to the north of Euston Road
- 1.7 The existing Belgrove House also presents an unsatisfactory frontage to Argyle Square to the south of the site and the adjoining Bloomsbury Conservation Area. It presents blank frontages on all sides which does nothing for the townscape, streetscape or public realm or the anti-social behaviour which is prevalent in this area.
- 1.8 From an employment perspective, the existing storage building is significantly underused, hosting only 3 jobs in a space of 10,620sqm. Across the whole site which includes the poor-quality retail units fronting Euston Road and the McDonald's unit on the corner, the building makes provision for circa 45FTE jobs.
- 1.9 Belgrove House lies in the heart of the Knowledge Quarter (KQ) which is one of the densest concentration of scientific and knowledge-based organisations anywhere in the world, creating an incubator for the UK. It is defined as a 1-mile radius around King's Cross. Over recent years, the KQ has seen the introduction of key occupiers such as The Francis Crick Institute, Google, The Wellcome Trust, amongst many others. The redevelopment proposals present a significant opportunity to extend this transformation to the south of the stations, improving the linkage between Bloomsbury and King's Cross and substantially to

improve the environment both physically and socially for those already living and working in the vicinity. The proposals would support the KQ as a cluster of innovation.

- 1.10 The London Borough of Camden has recently consulted on its Draft Site Allocations Local Plan, February 2020. Whilst the draft site allocations document holds limited weight in the assessment of the proposals, the proposals have been developed with regard for LB Camden's future aspirations for development in this location, as set out in the draft policy wording.
- 1.11 Belgrove House is allocated for an employment-led mixed-use development in particular for uses relating to the knowledge and innovation economy. The draft allocation sets out the Council's aspiration for high quality public realm surrounding the site to improve the relationship with Argyle Square and its setting and, in addition, a comprehensive set of community and public benefits. The proposals must be informed by a robust understanding of the historic context of the site inclusive of the merits of the existing building
- 1.12 The site presents a number of planning, design and environmental considerations which have been carefully considered in the context of the proposed scheme. The development potential of the site in terms of land use and height, bulk and mass has been forensically considered in the context of the surrounding uses, nearby listed buildings and, in particular, the Grade I listed King's Cross and St Pancras Chambers to the north, the adjoining conservation areas and open spaces, daylight and sunlight, views and streetscape. Within this context, the site also presents a major opportunity for development, being an under-utilised site, located in a strategic location immediately opposite the international transport hub of King's Cross / St Pancras.
- 1.13 The submission of this planning application follows close consultation with planning, design, conservation, inclusive economy, highways and public realm officers at the London Borough of Camden as well as statutory bodies such as Historic England, the GLA and TfL.
- 1.14 The proposed development is informed by a study of the merits of the existing building both from a heritage perspective and additionally from a whole life-cycle carbon approach looking at the carbon footprint of demolition of the existing building.

- 1.15 A comprehensive townscape analysis has informed the bulk, massing and design of the proposed development to ensure that it relates to its surroundings and respects the nearby heritage assets whilst creating a new world class addition to this prominent central London location.
- 1.16 In terms of environmental credentials, the proposed building will target BREEAM Outstanding, with a minimum commitment to BREEAM Excellent. Overall, the proposals will result in an overall operational carbon emissions reduction of 43%.
- 1.17 In conjunction with this application, a planning application is submitted for 33 new affordable homes at Acorn House, a 4-minute walk away from the site on the corner of Swinton Street and Gray's Inn Road. The proposals for Acorn House also incorporate affordable workspace and a retail unit. The two applications will be linked by a S106 Agreement.
- 1.18 The London Borough of Camden sets out its vision for the borough in its Camden 2025 Vision which includes a series of 'call to action' points that it seeks to deliver over the next 5 years. These include:
- Everyone in Camden should have a place they call home;
  - Growth in Camden should be strong and inclusive – everyone should be able to access the work that is right for them;
  - Camden should be safe, strong and open, and everyone should be able to contribute to their community;
  - Camden should be a clean, vibrant and sustainable place; and
  - Everyone in Camden should be able to live a healthy, independent life.

1.19 In support of this vision, Camden has implemented a number of initiatives including:

- Camden's STEAM (Science Technology Engineering Arts and Maths) initiative which aims to promote Camden's successful creative and knowledge economy and to ensure businesses succeed by having access to diverse and young local talent. The STEAM commission was established to:
  - Highlight Camden's unique STEAM economy and the skills needed for the roles of the future;
  - Encourage greater fusion in creative, digital and scientific education;
  - Mobilise business resources to drive skills and careers education; and
  - Tackle underrepresentation and provide all Camden young people with access to the opportunities available locally.
- Good Work Camden which is a Council Investment of £5m over three years to transform the support available to people trying to find work in the borough;
- The Renewal Commission which is a new taskforce that is co-chaired by Camden Council and UCL Institute for Innovation and Public Purpose (IIPP). The fundamental principles driving change going forward is achieving growth via a sustainable and inclusive economy that works for all.

1.20 The proposed development would deliver a substantial package of public benefits designed to embrace these initiatives and would result in a development which would contribute to reducing inequalities and increasing life chances in neighbouring communities and the borough generally by maximising social value at the planning, construction and end user phases, by supporting increased access to jobs, skills training and education opportunities.

1.21 It is expected that the construction phase alone would generate over 1,000 across a 38-month construction period. Additionally, the construction phase of the development will create the opportunity for circa 60 work placements and apprenticeships.

1.22 It is estimated that the construction workers supported at both sites will spend a total of £5.8m in the surrounding area during the construction period which equates to £1.9m annually which will support surrounding local businesses.

1.23 Once operational it is anticipated the level of employment on site arising solely from MSD is anticipated to be above 800 jobs.

1.24 In line with the Camden STEAM Pledge, the applicant will honour the ambitions of STEAM and will ensure an inclusive economy by working with young people and ensuring opportunities from the development to contribute to Camden's guarantee of the best opportunities and futures for young people. The proposals include exhibition space within the ground floor which would host permanent and temporary exhibits about work undertaken within the Knowledge Quarter and could host tours, training events and education workshops for local schools or groups to offer insight on the life-sciences sector. It is envisaged that the ground floor will include a dedicated Knowledge Centre which could include a research desk, VR Headsets, interactive learning kiosks, a 3D model of the Knowledge Quarter and exhibition boards which demonstrate how the KQ could benefit those living and working in the area.

1.25 The proposed development will deliver the following benefits :

#### Environmental

- Targeting BREEAM Outstanding with a minimum commitment to BREEAM Excellent
- Target to reduce on-site operational regulated carbon dioxide emissions by 43%
- All electric building with no combustion on site during normal operation
- Innovative double skin façade providing solar control to occupied spaces and enabling the upper office floors to be naturally ventilated
- Biophilic design maximising the amount of natural planting promoting good mental health
- Roof mounted photovoltaics
- Green roof terraces with biodiversity measures
- Rainwater harvesting for irrigation and greywater recycling for toilet flushing
- Detailed embodied carbon assessment to reduce embodied carbon in construction materials
- Diversion of demolition and construction waste for reuse and recycling
- Contributing to substantial improvements to the public realm both along the frontage of Euston Road, and in the context of Argyle Square and the surrounding uses.
- Closure of St Chads Street to vehicles and creation of a new pedestrianised landscaped public space
- Sustainable Urban Drainage



- Removal of LUL boxes and incorporation of an underground entrance providing step free access to King's Cross Station south of the Euston Road
- Participating in the future discussions with regard to the redesign of Argyle Square
- Encouraging sustainable transport options such as cycling and walking to reduce pollution from transport.

### Social

- 33 new affordable homes at Acorn House, Gray's Inn Road (4 mins walk from Belgrove House)
- A tenure split of 60% social rent and 40% intermediate rent
- Dedicated children's playspace
- Community room and terrace for all residents
- New, flexible affordable workspace at Acorn House
- Potential for relocation of the Post Office within Acorn House
- A new café available for use by the general public
- New event space and auditorium available for use by the general public, subject to a detailed management plan
- Publicly accessible ground floor, including potential Knowledge Centre and exhibition space, subject to detailed management plan

### Economic

- Over 1,000 jobs during the construction period first targeted at Camden residents and then via Central London First
- Approximately £5.8m spent by construction workers in the surrounding area during the construction period which equates to £1.9m annually which will support surrounding local businesses.
- Work placements and apprenticeships during the construction period
- Over 800 jobs during operation
- Apprenticeships made available each year in the completed development within a range of roles
- Promotion of the Camden STEAM Commission objectives amongst end users and occupiers
- Requiring living wage as a minimum salary for all local employers
- Maximising the opportunities for local businesses to supply goods and services at the construction and end user phases.

## 2 Introduction

- 2.1 This planning application has been brought forward following detailed pre-application discussions with planning, design, conservation, inclusive economy, highways and public realm officers at the London Borough of Camden (LB Camden) as well as statutory bodies such as Historic England (HE), the Greater London Authority (GLA) and Transport for London (TfL). The application is a strategic application by virtue of its height and total proposed floorspace and is thus referable to the GLA.
- 2.2 This statement sets out the town planning case in support of the application. It provides an overview of the site and surroundings and the planning history of the site and assesses the proposed development in the context of national, regional and local planning policy and guidance in addition to the emerging policy context for the Site.
- 2.3 This Planning Statement is submitted in support of a detailed planning application for the demolition and redevelopment of Belgrove House, Belgrove Street, London WC1H 8AA (the “Site”) to provide a new ground plus part nine part four storey commercial development with two basement levels for use as an office and research and development headquarter building for the life sciences sector. The building incorporates a publicly accessible ground floor including a café and flexible retail floorspace, an auditorium and events space and a step-free entrance to King’s Cross London Underground Line (LUL) in place of the two existing tube boxes on Euston Road. The applicant is also seeking to contribute to high quality landscaping on Belgrove Street, Crestfield Street, Euston Road and St Chad’s Street. The proposed building has been designed by Stirling Award winning architects, Allford Hall Monaghan Morris (AHMM) who have extensive experience of working in Camden including The Post Building and The Google Building at 6 Pancras Square. The public realm has been designed by Bradley-Hole Schoenaich Landscape who designed the landscaping for the new King’s Cross Square.
- 2.4 The application has undergone significant consultation with various stakeholders; this is detailed further in Section 6 of this statement and in the accompanying Statement of Community Involvement and includes third parties such as; Historic England, King’s Cross and Brunswick Neighbourhood Association, King’s Cross Development Forum, Camden Cyclists, Friends of Argyle Square, Bloomsbury Conservation Area Advisory Committee,

and others. The application proposals have evolved over the consultation period and have been revised to accommodate comments made during the consultations.

- 2.5 The Statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan, against which development within the LB Camden must be assessed includes the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in March 2016. The Examination in Public (EiP) on the New London Plan was held between 15th January and 22nd May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019. As such policies contained within the Intend to Publish version of the New London Plan 2019 are of significant weight in the determination of this planning application.
- 2.6 The Local Development Framework ('LDF') which consists of the Camden Local Plan and was adopted on the 03 July 2017, the Local Plan Policies Map (updated March 2019), the Camden Site Allocations Plan (September 2013), Neighbourhood Plans and supplementary Camden Planning Guidance ('CPG') documents.
- 2.7 The Statement is structured as follows:
- Section 3 – Site and Surroundings;
  - Section 4 – Planning History;
  - Section 5 – Development Proposals;
  - Section 6 – Consultation; and
  - Section 7 – Planning Policy Context.
- 2.8 The examination of policy and material planning considerations arising from the application proposals are then discussed in the following sections:
- Section 8 – Land Use;
  - Section 9 - Design;
  - Section 10 – Heritage, Townscape and Views;
  - Section 11 – Landscape and Public Realm;
  - Section 12 – Energy and Sustainability;
  - Section 13 – Amenity;
  - Section 14 – Transport and Servicing;

- Section 15 – Other Considerations;
- Section 16 – Planning Obligations; and
- Section 17 – Summary and Conclusions.

2.9 This Statement should be read in conjunction with the accompanying plans and drawings submitted, as well as the following documents which are also submitted in support of this application (in addition to this Statement):

- Covering Letter, prepared by Gerald Eve LLP;
- Site Location Plan; prepared by AHMM
- Site Plan; prepared by AHMM
- Existing and Proposed General Arrangement Plans, Sections and Elevations, prepared by AHMM;
- Demolition plans, prepared by AHMM;
- Health Impact Assessment; prepared by Trium;
- Statement of Community Involvement, prepared by London Communications Agency (LCA)
- Regeneration Statement and Economic Impact Assessment, prepared by Volterra;
- Design and Access Statement, prepared by AHMM
- Acoustic and Vibration Assessment, prepared by Sandy Brown
- Sustainability Statement (including BREEAM pre-assessment), prepared by Atelier 10
- Whole Life Carbon Assessment, prepared by Atelier 10
- Energy Assessment, prepared by Atelier 10
- Air Quality Assessment, prepared by Air Quality Consultants (AQC);
- Basement Impact Assessment (inclusive of Floor Risk Assessment), prepared by AKTII
- Townscape, Heritage and Visual Impact Assessment, prepared by Peter Stewart Consultancy;
- Daylight, Sunlight and Overshadowing Assessment, prepared by EB7;
- Biodiversity Survey and Report, prepared by PJC Consulting;
- Tree Statement and Arboricultural Impact Assessment, prepared by PJC Consulting;
- Transport Assessment, prepared by TTP;
- Construction Management Plan, prepared by RPM

- Archaeology Assessment, prepared by MOLA;
  - Circular Economy Statement, prepared by Atelier 10;
  - Contaminated Land Assessment, prepared by Soiltechnics; and
  - Wind Impact Assessment, prepared by Arup.
- 2.10 This application is linked to an application for the demolition and redevelopment of Acorn House (to provide 33 new affordable housing units, affordable workspace and a retail unit) in the sense that the Acorn House site will be the preferred location for the affordable housing policy requirement generated by the redevelopment of Belgrove House.
- 2.11 The package of public benefits deliverable with this application is substantial both for London and nationally and most importantly for the communities surrounding the site. The national planning framework and the very planning system itself is concerned with achieving the objectives of sustainable development, which is described in the National Planning Policy Framework (NPPF) (2019) as **‘meeting the needs of the present without compromising the ability of future generations to meet their own needs.’** It is explicitly stated that in order to achieve sustainable development, the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways:
- a) An economic objective
  - b) A social objective
  - c) An environmental objective
- 2.12 The ground floor of Belgrove House is to be publicly accessible. The café at the southern end of the proposed building will be for use both by the public and by workers within the building. The public will have access through the ground floor to the main entrance on Euston Road and additionally to the LUL entrance in the north west corner of the building.
- 2.13 There is an auditorium proposed which will be accessible from the southern end of the site and located at ground and lower ground floor level. This could be available at times for use by community groups as well as to host events linked to the work undertaken by MSD inside Belgrove House.

2.14 The proposals include exhibition space within the ground floor which would host permanent and temporary exhibits about work undertaken within the Knowledge Quarter and could host tours, training events and education workshops for local schools or groups to offer insight on the life-sciences sector. It is envisaged that the ground floor will include a dedicated Knowledge Centre which could include a research desk, VR Headsets, interactive learning kiosks, a 3D model of the Knowledge Quarter and exhibition boards which demonstrate how the KQ could benefit those living and working in the area.

2.15 The proposed development will deliver the following benefits :

#### Environmental

- Targeting BREEAM Outstanding with a minimum commitment to BREEAM Excellent
- Target to reduce on-site carbon emissions by 45%
- All electric building with no combustion on site during normal operation
- Innovative double skin façade providing solar control to occupied spaces enabling the office floors to be naturally ventilated
- Biophilic design maximising the amount of natural planting promoting good mental health
- Roof mounted photovoltaics
- Green roof terraces with biodiversity measures
- Rainwater harvesting for irrigation
- Detailed embodied carbon assessment to reduce embodied carbon in construction materials
- Diversion of demolition and construction waste for reuse and recycling
- Contributing to substantial improvements to the public realm both along the frontage of Euston Road, and in the context of Argyle Square and the surrounding uses.
- Closure of St Chads Street to vehicles and creation of a new pedestrianised landscaped public space
- Sustainable Urban Drainage
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### Economic

- Over 1,000 jobs during the construction period first targeted at Camden residents and then via Central London First
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- Work placements and apprenticeships during the construction period
- Over 800 jobs during operation
- Apprenticeships made available each year in the completed development within a range of roles
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- Requiring living wage as a minimum salary for all local employers
- Maximising the opportunities for local businesses to supply goods and services at the construction and end user phases.

## The Life Sciences Sector

- 2.16 London has a long history as a centre for advancement in medicine and biology and today, together with Oxford and Cambridge, forms the 'Golden Triangle', a global hub for life sciences.
  
- 2.17 Mayor Sadiq Khan has stated his support for different sectors to work together to solve healthcare challenges, including exploring the safe use of health data for research, supporting increased investment to allow innovative life sciences firms to grow, and enabling new life science developments to expand in London.
  
- 2.18 In 2017, the Life Sciences Sector Deal which is a partnership between the Government and the Life Sciences industry, set out the first phase of implementing the Life Sciences Industrial Strategy through joint commitments between the Government and the sector to invest in the United Kingdom's life sciences landscape. The sector deal sets out the recommendations for the UK's world-leading life sciences industry to drive growth, increase productivity, improve the use of data, reinforce the country's science base, deepen the UK's skill set and secure benefits for patients throughout the United Kingdom.
  
- 2.19 The Life Sciences Sector Deals will help ensure new pioneering treatments and medical technologies are produced in the UK, improving patient lives and driving economic growth. The deals involve substantial investment from private and charitable sectors and significant commitments in research and development from the government. The agreements made in the first deal capitalised on the enormous opportunities for growth that the life sciences sector presents for the UK and the continual flow of new investment across health tech and pharmaceutical sectors since the deal was published, with the second deal seeing more life sciences companies investing in the UK and creating high-quality and well-paid jobs. Life Sciences is a sector that operates at the cutting edge of technological developments.
  
- 2.20 Government investments in these emerging areas are being matched by greater contributions from the sector, and this is building on existing strengths spanning research and healthcare to create and grow new industries in the UK.
  
- 2.21 The life sciences industry continues to be one of the most important pillars of the UK economy and the continued strength of the partnership between the government, the NHS



(National Health Service) and the life sciences sector is continuing to make the UK a global standard-bearer for discover research and advance manufacturing.

2.22 Their key commitments going forwards are summarised as follows:

- Establishing the Health Advances Research Programme
- Strengthening the UK environment for clinical research
- Raising the intensity of R&D in the UK
- Making the UK a global hub for advanced therapies manufacturing
- Supporting growth of life sciences manufacturing
- Improving the UK Environment for businesses to scale up
- NHS innovation and collaboration
- To have prosperous communities throughout the United Kingdom i.e. a commitment to implementation of a regional approach to the sector deal working closely with devolved administrations and cluster organisations representing the sector

To monitor the impact of the apprenticeship levy and to support standards brought forward by the sector

### The Knowledge Quarter

2.23 The Knowledge Quarter (KQ) Partnership was established in December 2014 to recognise and develop Camden's strength as a thriving knowledge economy with world-class institutions in science and creative industries. The KQ is a consortium of partner organisations of many different kinds but all actively engaged in disseminating knowledge. They are formed of over 100 academic, cultural, research and scientific and media organisations and their vision is described as '**transforming lives through innovation.**'

1.26 The KQ identify their four strategic priorities as follows and the proposals for the redevelopment of Belgrove House have been developed with these values at its core:

- **Advocacy** – the knowledge quarter will increase the area's profile through advocacy and stakeholder engagement, both nationally and internationally
- **Knowledge exchange** – The Knowledge Quarter will facilitate knowledge exchange and identify opportunities for openness, collaboration and networking between its members

- **People** – The Knowledge Quarter will work with its members to increase public access to their knowledge resources and collections, creating opportunities for exchange with local citizens
  - **Place** – The Knowledge Quarter will work with its members to identify and support work that improves out local environment, creating a great place for people to live work and visit.
- 2.24 Camden has a thriving knowledge economy with world-class academic, cultural, research, scientific and media institutions and organisations. In recent years these institutions and organisations have started to cluster in the area surrounding King's Cross and St Pancras and Euston Stations and the area has seem tremendous growth owing to the excellent transportation links, highly skilled workforce high-quality office and laboratory floorspace and the enhanced retail, art and leisure offer.
- 2.25 This application seeks to deliver a building housing laboratory space, lab-enabled floorspace and supporting write-up office floorspace, suitable for occupation by a science-based research operation to support the KQ as a world-class cluster of science and knowledge-based institutions.

## MSD

- 2.26 MSD are seeking a location for a new HQ/Discovery Centre and their search has focussed on particular sites in London, Belgrove House being one of them. Their commitment to the UK and the UK's life sciences initiative has been widely reported in the press and their preference was to be located near to The Crick where they may retain some of their research space. The intention is to bring together approximately 800 laboratory researchers and office-based staff into one building to consolidate personnel that are currently located in Hoddlesdon, Pancras Square, the Crick and LBIC (London BioScience Innovation Centre). Consolidation of these sites to encourage collaboration has been a key driver in the ambitions for the redevelopment of Belgrove House
- 2.27 The applicant has agreed commercial terms with MSD to occupy the building subject to obtaining planning permission. MSD is at the forefront of scientific and medical research, be it responding to urgent healthcare challenges, developing technological based healthcare solutions or ensuring a steady supply of essential vaccines, and collaborating

closely with the National Health Service (NHS), leading universities and cutting edge research bodies to transform healthcare both in the UK and around the world.

- 2.28 In the context of the current Covid-19 pandemic, on 26 May, MSD announced three significant initiatives to combat Covid-19 which includes two agreements to develop vaccines and a research collaboration to advance the development of a novel antiviral candidate. Being at the forefront of current medical research and scientific discovery, the importance of securing an occupier of this nature in this location is only heightened, not only on a national, regional and local scale but also on an international scale as well. This meets the aspirations of the KQ in terms of attracting world-class science and knowledge-based institutions to this location.
- 1.27 MSD currently has a Neighbour of Choice program which indicates how they currently interact productively with the communities in which they are located. It shows the extent to which they commit to assisting local non-profit organisations who ‘share their mission.’ They are also committed to adding benefit to the community via their employee volunteer program which allows employees to volunteer activities of their choice either at the MSD site location, or the neighbourhood where they live. Group volunteer activities support local schools, charities and environmental projects are often organised as team-building event.
- 2.29 Appendix A, which includes a Planning Benefits Statement, indicates how the proposed benefits and potential outreach activities meet the ambitions of Good Work Camden, the STEAM pledge, the Renewal Commission and ultimately Camden’s vision as set out in the most recent vision document to 2025.

### 3 Site and Surroundings

- 3.1 This section describes the Site's location and context in greater detail. The full extent of the Site is shown within the red line boundary of the Site Plans, submitted with this application.
- 3.2 The 0.4 ha application site is located at Belgrove House on Belgrove Street in the London Borough of Camden ('LB Camden') within the ward of King's Cross.
- 3.3 The Site is located in the Central Activities Zone; the vibrant heart and globally-iconic core of London described in the London Plan as '**one of the world's most attractive and competitive business locations.**' Additionally, the Site is located within Camden's Central London Area described in policy terms at a local level as a major business and employment centre and the main focus of Camden's economy.
- 3.4 The Site's location is within the Knowledge Quarter Innovation District which spans from Camden Town to Holborn and Covent Garden and is home to a world-class cluster of scientific and knowledge-based institutions and companies that specialise in areas such as life-sciences, data and technology and creative industries. In recent years, such institutions have started to cluster around the area surrounding King's Cross and Euston Stations and owing to excellent transportation links, a highly skilled workforce and the high-quality office and lab space in the vicinity. Opposite King's Cross masterplan which sits in King's Cross Opportunity Area to the north of the Euston Road.
- 3.5 Belgrove House, on the south side of Euston Road, lies in the King's Cross/St Pancras Conservation Area and close to the boundary of the Bloomsbury Conservation Area. It occupies the entire urban block defined by Euston Road to the north, Argyle Square and St Chad's Street to the south, Belgrove Street to the west and Crestfield Street to the east. As described in the Townscape Heritage and Visual Impact Assessment, it is an unremarkable 3 storey brick faced building with a flat roof and a basement. The building is in use as a storage facility (Class B8) (and has been for many years), and there are three low quality retail units at the northern end facing Euston Road. These are occupied by McDonald's (Class A3/A5), a post office (Class A1) and an additional retail unit currently occupied by a 'left luggage' operator (Class A1).

- 3.6 The existing building is not included in the statutory list of buildings of special architectural or historic interest nor on any local list. There are a number of heritage assets in close proximity to the Site, including several Grade I listed buildings. These comprise St Pancras Chambers, King's Cross Station and the British Library. Additionally, there are a number of Grade II listed buildings nearby comprising The Great Northern Hotel, Number 1-8 Belgrove Street and Numbers 1-5 and 7-25 Crestfield Street.
- 3.7 The land in the vicinity of the site contains a range of uses. King's Cross and St Pancras Stations and the new King's Cross masterplan dominate the area to the north and north east, whilst the buildings to the east and west of the site facing onto Euston Road typically have high street type uses (shops/banks/cafes etc) at ground floor with offices and hotel accommodation to the rear and above. To the south, hotels are present on roads to east and west of the development. Argyle Square to the south of the site contains 19th Century town houses that face onto a publicly accessible garden square, many of which have been converted to hotels or guest houses with very few residential dwellings remaining. The King's Cross Methodist Church is located on Crestfield Street to the east of Belgrove House.
- 3.8 Euston Road is a very busy section of the A501 that stretches east to west between Old Street and Edgware Road. Belgrove Street and Crestfield Street are both one-way streets that direct traffic away from Euston Road. St Chad's Street is narrow two-way street running parallel to Euston Road. It forms part of the King's Cross gyratory systems that operates to the north and east of the site. Euston Road forms a part of the Transport for London Road network (TLRN).
- 3.9 The site is served by St Pancras International Station, King's Cross Station and King's Cross Underground Station and by an established pedestrian network. A covered entrance to the subway that provides pedestrian access beneath Euston Road to King's Cross and St Pancras Stations is located on Euston Road, outside the frontage of the site. A further subway entrance is located approximately 40 metres to the west of the site on Euston Road. These two entrances provide convenient access to the stations but significantly reduce footway width on Euston Road and impede pedestrian flow at this busy location. Furthermore, neither entrance has a lift and therefore restricts access to the stations from south of the Euston Road.

- 3.10 King's Cross Underground Station is served by the Northern line, Victoria line, Piccadilly line, Hammersmith and City line, Circle line and the Metropolitan line, making it the most connected station in the Capital. King's Cross Station provides access to rail services connecting London with north-east England, The Midlands and Scotland. St Pancras International Station provides services to national and international locations inclusive of Nottingham, Margate, Brighton, Bedford and international destinations such as Paris and Brussels.
- 3.11 The nearest bus stops are located on Euston Road within 200m (2-3 minute) walk of the site. These stops provide access to a range of services with buses 46, 63, 30, 73, 205, 214 providing routes towards Farringdon, Holborn, Hackney, Bow Church and Moorgate. Further stops are located on Gray's Inn Road which provide access to some of the previously listed services, as well as buses 91 and 390 which provide routes to Trafalgar Square and Victoria. The site is extremely well served by bus services with 9 different bus routes services bus stops within a 320m (4 minute) walk from the site.
- 3.12 The site has a PTAL (public transport accessibility level) of 6b demonstrating that it has 'Excellent' level of accessibility to public transport which is the highest rating possible.

## 4 Planning History

- 4.1 A thorough review of Camden's online planning history register has been undertaken. The planning history for the site is minimal and there have been no recent applications.
- 4.2 Most recently, planning permission was granted under ref 2010/1319 for the **installation on carriageway of a cycle hire docking station including a registration/payment terminal and maximum of 22 docking points for bicycles, in connection with the Transport for London Cycle Hire Scheme,** as amended by permission ref. 2010/1319/P (17/03/2010).
- 4.3 Planning application (PS9905272) granted planning permission for the site on 28/02/2000 for **'The change of use from B1 (office) and car park (sui generis) to B8 (storage), and the retention of existing B8 (storage) floorspace, together with associated internal alterations, the installation of a new doorway, new reception and office frontage and two new roller shutters to replace existing, to the Belgrove Street elevation, a new doorway, replacement shutter, installation of anew window and roof over a light well to the Crestfield Street elevation, as shown by drawing numbers SL6797(SY)01, /02, /03, /04, /05, /06, /07, /08, A6797(D)01, /02, /03, /04, /05, /06, /07, /08, A6797(2)02B and Traffic Survey dated 23rd February 2000.'**
- 4.4 Associated with the application referenced above were application ref. PSX0005128 and ref. ASX0005135 which granted permission respectively for roller shutters and signage associated with the Class B8 storage use permitted under ref. PS9905272. The signage application was part refused and later allowed at appeal.
- 4.5 The existing McDonald's unit was granted planning permission under ref. 9400660 and additionally allowed at appeal under ref. 940661 on 09/05/1994. Full planning permission was granted for **'change of use of the eastern part of the ground floor and basement from a Post Office to a restaurant with takeaway facilities as shown on location plan.'**
- 4.6 A certificate of lawfulness (ref. 9300002) was granted on 26 August 1993 for the **"Certificate of lawfulness for the proposed use of the basement ground and**

**mezzanine floors of Belgrove House as a taxi centre comprising parking with ancillary washing and maintenance facilities for taxi cabs restaurant and recreation facilities for taxi drivers ancillary office accommodation with vehicle movements of approximately 500 (1000 two way) per day."**

- 4.7 The following applications are less relevant to the Proposals as set out in this Planning Statement but have been included for completeness.
- 4.8 Planning permission (ref. 8731) was granted on 04 June 1970 for the **"The use of shops 15-21 at Belgrove House, N.W.1. as a Branch Post Office and the alterations to the ground floor elevations fronting Euston Road, Belgrove Street and Crestfield St"**. The scheme was implemented, and the post office remains on Site today.
- 4.9 Planning permission (ref. TP5624/2902) was granted on 30 July 1947 **"In principle to the erection of three additional storeys to Belgrove House, Euston Road, St. Pancras, generally as shown on the said plan, subject to:- (i) the use of these storeys being for offices only; and (ii) the submission of detailed plans, sections and elevation to all the surrounding streets showing the building next Argyle Street and where it abuts on Belgrove Street and Crestfield Street for a distance of 200'0" measured from the angle of the building next Argyle Square set back to conform to an angle of 51 degrees drawn from the opposite sides of these streets.'** There is no record that this scheme was ever implemented.
- 4.10 Planning permission (ref. TP5624/18204) was granted on 03 March 1950 for the **"The erection of three additional floors at Belgrove House, Euston Road, St. Pancras, for use as offices"**. There is no record that this scheme was ever implemented.
- 4.11 The oldest relevant application (ref. TP5624/10970) relating to the site was approved on 09 June 1947 **"In principle, to the use of Belgrove House, Euston Road, St. Pancras, for purposes in connection with the production of films generally, including film processing as shown on the said plans, for a limited period of fourteen years from the first day of July, 1947, subject to the submission of satisfactory detailed plans of the arrangements"**.



- 4.12 It is clear from the minimal and historical nature of the planning history at the site that the development potential has been considerably underutilised. This planning application will be the first significant development proposal at the Site that will be implemented since the first Town and Country Planning Act was passed and will realise the full potential of the site in the context of how the wider area has been transformed over the years.
- 4.13 This application provides the opportunity to deliver the much-needed redevelopment of this site in order to deliver its associated benefits and would facilitate regeneration of the local area of King's Cross, the Knowledge Quarter and the wider London, both now and in the future.

## 5 Development Proposals

5.1 This section of the Statement sets out the key aspects of the proposed development. A full explanation of the proposed development is set out within the Design and Access Statement and depicted on the application drawings, prepared by AHMM architects, and submitted with this application. The key details of the proposals are summarised in this section below.

5.2 The description of the development is as follows:

**‘Redevelopment of Belgrove House as a part 5 part 10 storey building plus 2 basement levels for use as office and research and laboratory floorspace incorporating café and flexible retail and office floorspace, an auditorium and a new step free entrance to King’s Cross LUL station in place of the two tube boxes on Euston Road together with terraces at fourth and fifth floor levels, servicing, cycle storage and facilities, refuse storage and other ancillary and associated works.’**

5.3 The proposals form part of a two-site strategy which links Belgrove House to a planning application for the redevelopment of Acorn House to provide affordable housing in line with LB Camden’s mixed use policy. The application for the redevelopment of Acorn House will in addition incorporate affordable workspace and a retail unit. A separate Planning Statement has been prepared for the Acorn House application.

### Development Rationale

5.4 The proposals on this site have been developed in the innovative context of the Knowledge Quarter to deliver an exemplar building which will lead the way for development in the future in terms of its sustainability credentials and will create a specialised head quarter office and laboratory building, suitable for occupation by a major life sciences occupier.

5.5 The proposals reflect the aspirations of both adopted planning policy and guidance and the emerging policy context both in terms of the London Plan (Intend to Publish version) and the Site Allocations Document (2019) which is currently being consulted on both in respect of the Site itself and the wider Knowledge Quarter.

- 5.6 The proposed development delivers a substantial package of public benefits designed to specifically embrace the Camden 2025 Vision and initiatives and result in a development which contributes to reducing inequalities and increasing life chances in neighbouring communities and the borough generally by maximising social value at the planning, construction and end user phases, supporting increased access to jobs, skills, training and education opportunities.
- 5.7 The application proposals have evolved in response to discussion and feedback from officers at LB Camden, the GLA, Historic England and extensive consultation with local groups, stakeholders and residents. This is set out in further detail in Section 6 of this Statement and within the Statement of Community Involvement ('SCI') that has been prepared by London Communications Agency and submitted with this application.
- 5.8 Belgrove House as described in the TVHIA, is an unremarkable building in heritage terms and is considered to be 'neutral' in terms of its contribution to the setting of the King's Cross and Bloomsbury Conservation Areas and surrounding listed buildings. A detailed analysis of the heritage value of the existing building has been undertaken by Peter Stewart Consultancy and is included in detail in the Townscape and Visual Impact Assessment submitted with this application and in Section 11 of this Statement. Historic England have described the building as 'architecturally uninspiring.'
- 5.9 The existing streetscape along Belgrove Street, Crestfield Street and St Chad's Street is poor quality. The lack of activity and active frontage arising from the current use of the building lends itself to issues with antisocial behaviour, additionally associated with Argyle Square. The site therefore presents a significant opportunity to improve the surroundings and significantly reduce antisocial behaviour issues in the area.
- 5.10 The pedestrian environment on Euston Road is extremely busy particularly at peak hours and the two existing tube boxes that provide access to King's Cross LUL station from the south side of Euston Road, obstruct pedestrian flows, exacerbating congestion on the pavement. The application therefore seeks to remove both boxes and replace with a single step free access from the north west corner of the building which will provide underground access to the station. The removal of the tube box directly outside the building has been agreed with LUL and it is the hope that there will be imminent agreement to removal of the second tube box as well. Additionally, it is evident that often people attempt to cross Euston Road without using a crossing. Euston Road is also extremely

busy to vehicular traffic which presents a significant danger to pedestrians attempting to cross informally. The new entrance seeks to reverse this trend by increasing the legibility of the underground access.

- 5.11 In recent years, King's Cross station and the area surrounding it has been transformed by the redevelopment of the King's Cross masterplan including the Google Building, Granary Square, Coal Drops Yard and the public realm in the vicinity. In addition, the Francis Crick Institute has been developed to the north of the British Library. Such developments have already acted as a catalyst for change in the area and the proposed redevelopment of Belgrove House seeks to further contribute to improving the area with high quality architecture, significantly improved public realm and seeks to extend the transformation of the area surrounding King's Cross towards Bloomsbury, improving the relationship between the character of the King's Cross Conservation Area and the Bloomsbury Conservation area adjacent.
- 5.12 The Euston Road urban condition, defined by taller buildings, continues into the area defined by the buildings around King's Cross Square. The redevelopment of Belgrove House will engage fully and appropriately with the completed improvements to King's Cross Square, mediating between the taller buildings on Euston Road and those that frame Argyle Square. The architecture along Euston Road is characterised by larger civic scale buildings such as the Standard Hotel, St Pancras Chambers and the British Library. The north elevation of Belgrove House will have a prominent position on Euston Road addressing King's Cross Square. The east and west elevations facing Belgrove Street and Crestfield Street mediate the changing architectural character of the Georgian terraces to the south and the civic scale, public buildings along Euston Road to the north.

## Land Use Summary

- 5.13 A summary and comparison of the existing and proposed land use components is set out in table 1 below:

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net change in GIA (sqm)
Storage and Distribution (Class B8)	10,620	0	-10,620
Office/Labs	0	24,158	24,158
Retail (Class A1)	490	0	-490
Retail (A1/A3)	0	407	407
Restaurants and Hot Food Takeaway (Class A3/A5)	402	0	-402
Flexible Retail and Office (Class A1, B1, A3 and A5)	0	462	462
LUL Entrance	0	353	353
<b>Total</b>	<b>11,512</b>	<b>25,380</b>	<b>13,868</b>

*Table 1: Existing and Proposed Land Use Areas*

## Provision of Research and Development and Office Floorspace

- 5.14 The proposals seek to provide 24,158sqm of office and research and laboratory floorspace across 10 storeys and two basement levels, suitable for occupation by a life sciences

tenant. There are external terraces proposed for use by tenants of the building accessible from the fourth and fifth floors. It is anticipated the building would be occupied by a single tenant albeit the building has been designed flexibly to enable it to be let to multiple occupiers. The total amenity space provided amounts to 1,415 sqm.

- 5.15 The laboratory floors require office write up space close by hence the lab space is proposed across floors 1-3 fronting Euston Road and the office write up space associated is located across floors 1-3 fronting Argyle Square achieving the optimum layout for a life sciences occupier including for MSD. The floors have been designed to accommodate laboratory and write up space across the entire floor plate to cater for changing requirements.
- 5.16 The design and engineering processes to deliver the building have been informed by the requirements of life-sciences building occupiers inclusive of increased floor to ceiling heights to accommodate greater Mechanical Electrical and Plumbing (MEP) zones, increased vibration resistance within the structure and larger column grids. The building has been designed to be highly sustainable and an example of how carbon emissions may be reduced in anticipated construction, operation and future refurbishment.
- 5.17 This includes innovative ventilation strategies and highly efficient systems which will lead to a substantial reduction in carbon emissions. The externally expressed risers will provide air distribution and solar-shading to facades, reducing heat gains, and a biophilic double skin can provide views through the planting. In terms of sustainability credentials, the scheme is targeting BREEAM 'outstanding,' with a rating of 'excellent; expected as a minimum.
- 5.18 The primary entrance to the building is from Euston Road, with additional access on St Chad's Street and Belgrove Street. The access to the cycling facilities is located on Belgrove Street and the servicing access and loading bay located on Crestfield Street.

### **Auditorium**

- 5.19 The proposals include an auditorium and associated events space in addition to meeting rooms located across ground and lower ground floors. This will be for use by both tenants

of the building and will be available to hire by local community groups when not in use by the commercial occupier.

### **Exhibition Space**

- 5.20 Exhibition space is proposed within the ground floor reception area which could host permanent and temporary exhibits showcasing work undertaken within the KQ and could host tours for local schools or groups to offer insight on the life-sciences sector.

### **Knowledge Centre**

- 5.21 Following discussions with the Knowledge Quarter, Young Camden Foundation (YCF) and STEAM, it has become apparent that a provision to showcase the work being done in the building would be welcomed as part of the proposals. As such, an illustrative image of how this could be incorporated is included in the accompanying Design and Access Statement as submitted with the application. The Knowledge Centre could include a research desk, VR Headsets, interactive learning kiosks, a 3D model of the KQ, Exhibition boards which demonstrate how the KQ could benefit those living and working in the area

### **Provision of Retail and Restaurant/Café**

- 5.22 There are three existing retail units within the building on Euston Road, one of which is occupied by the Post Office. The applicant is in discussions with the post office about its potential relocation to the retail floorspace provided within Acorn House which is the off-site affordable housing site linked by legal agreement to this application. The existing building also contains a restaurant/hot-food takeaway unit occupied by McDonald's. It is proposed that a flexible office, retail, restaurant and hot-food takeaway unit is provided in the north east corner of the building fronting Euston Road. A café is proposed at ground floor level on the Argyle Square side of the building which will be open to members of the public as well as occupiers of the building.

### **King's Cross LUL Entrance**

- 5.23 The proposals include the closure and removal of the two existing tube boxes on Euston Road and replacement with an alternative entrance from the corner of Belgrove House. This will provide access to King's Cross Underground station for both members of the

public from Euston Road and for tenants of the building from within Belgrove House. The proposals for removal of the tube box directly outside Belgrove House has been agreed with London Underground. It is the hope that there will imminent agreement to removal of the second tube box in addition, and so it has been included in the application proposals.

### **Landscaping and Public Realm**

- 5.24 The public realm strategy proposes improvements such as new planting and trees within an urban greening design methodology in addition to the proposed rain gardens proposed along Belgrove and Crestfield Streets. The intention is to implement traffic calming measures along Crestfield Street by incorporation of chicanes occupied by tree planting along the street. Visually this will significantly enhance the pedestrian environment on the street. Along Belgrove Street it is proposed that the pavement is widened directly adjacent to the building line to enable sufficient space for pedestrian flows and to accommodate tree planting. This will displace the existing underutilised on-street vehicular parking spaces.
- 5.25 The ambition is for St Chad's Street to be closed to vehicular traffic in order to significantly improve the public realm between Belgrove House and Argyle Square to improve the relationship between the two and to encourage local communities to use the square more and to act as a catalyst for improvements within Argyle Square itself. The means by which this will be achieved can be discussed with the Council as highways authority but there is more than one possibility. The landscaping proposals inclusive of the tree planting strategy have been informed both by surveys to identify the location of underground services and by input from the structural team on the project to ensure that they are deliverable in conjunction with underground services and additionally the proposals at basement level. The landscaping and public realm improvements are further discussed in Section 11.
- 5.26 An external landscaped terrace is proposed at levels 4 and 5 of building to provide external amenity space to the tenant of Belgrove House. This will include extensive planting zones which will allow for continuity between the biophilic façade inside the building and the external terrace.



## 6 Consultation

- 6.1 This section summarises the outcome of the consultation process, and how the proposed development has evolved in light of comments received during the pre-application process. For further detail please refer to the Statement of Community Involvement.
- 6.2 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the evolution and preparation of this planning application.
- 6.3 This Section seeks to outline the consultation strategy for the application proposals.

### Policy Context

- 6.4 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.5 Paragraph 39-46 of the NPPF highlights the importance of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community

### Consultation Strategy

- 6.6 The application proposals for the demolition and redevelopment of Belgrove House have been subject to extensive consultation over a period since Autumn 2017. This consultation will continue following submission of the planning application. The strategy is detailed in the accompanying Statement of Community Involvement.
- 6.7 London Communications Agency have undertaken a phased programme of consultation which was largely undertaken remotely in light of the Covid-19 social-distancing requirements.
- 6.8 In April 2020, in light of Covid 19 restrictions, the Applicant shifted its engagement strategy from a physical face-to-face engagement process to online. Meetings with key

stakeholders were re-offered as virtual meetings. The Applicant also commissioned a filmed presentation of both emerging schemes which were sent to local groups on 20 April 2020.

6.9 In summary, the Statement of Community Involvement submitted with this application outlines the consultation strategy and the phases this has followed, which are:

- **Autumn 2017** – In principle meetings with LB Camden
- **October 2018** – More detailed pre-application discussions with LB Camden.
- **April 2019** – Scheme presented to the Strategic Review Panel
- **June 2019** – Scheme first presented to the Design Review Panel
- **October 2019** – Scheme presented to the Design Review Panel for the second time
- **February 2020** – Scheme presented in meetings to the GLA and Historic England.
- **March 2020** – Engagement with local stakeholder groups and close neighbours.
- **April 2020** – Consultation website launched for local stakeholder groups and close neighbours, with video presentations of emerging designs for both buildings narrated by the lead project architect. Virtual meetings were held with stakeholders such as The Knowledge Quarter, Young Camden Foundation, Urban Partners, Camden STEAM, The Megaro Hotel, King's Cross Brunswick Neighbourhood Association, The National Union of Journalists and Ward Councilors.
- **Early June 2020** – Launch of the consultation website to the wider public and information on the emerging designs along with a feedback survey to submit comments.
- **Early June 2020** – Launch of a social media ad campaign promoting the consultation website run on Facebook and Instagram from Thursday 4 June until Thursday 19 June.
- **Late June 2020** – Development Management Forum (DMF) attended by 37 people and watched on Camden's YouTube channel by a further 200.
- **Late June 2020** – Presented to Camden's Design Review Panel (DRP) for the third time, an expert panel of local architects and experts in the development field
- **Late July / early August 2020** – Virtual exhibition was held.
- **Late August 2020** – Submission of planning application to Camden Council

6.10 It is intended to hold an in-person exhibition following submission of the application if possible in the current Covid-19 circumstances. LB Camden

6.11 Those consulted include:

- LB Camden Officers;
- LB Camden Strategic Review Panel Members;
- Camden's Design Review Panel;
- Development Control Committee Members;
- Greater London Authority (GLA);
- Historic England;
- Transport for London (TfL);
- The Metropolitan Police;
- Young Camden Foundation;
- Knowledge Quarter;
- Residents, Neighbours and Other Stakeholders (The full list as detailed in the accompanying Statement of Community Involvement); and
- Third Parties.

6.12 A summary of the consultation responses is outlined below, and further details of comments received are contained within the supporting SCI, prepared by London Communications Agency.

#### **Camden Council Officers**

6.13 Extensive pre-application meetings have been held with planning and design officers from LB Camden since Autumn 2017. Meetings have also been held with internal departments at LB Camden such as Transport and Highways, Inclusive Economy, Energy and Sustainability officers.

6.14 Several iterations of the proposed design were subject to thorough review throughout the pre-application stage and the development proposals have evolved significantly throughout this period to incorporate comments received in relation to design wherever possible.

- 6.15 Further details on the design development and changes made as a result of pre-application discussions are included in the Design and Access Statement, prepared by AHMM architects.

### **Strategic Review Panel**

- 6.16 The design team met with the Strategic Review Panel (SRP) on the 29<sup>th</sup> April 2019 and issued their formal response to the proposals on 20<sup>th</sup> May 2019. Members present consisted of Chair of the SRP Cllr Danny Beales (Cabinet Member for Investing in Communities), Cllr Georgia Gould (Leader of the Council), Cllr Adam Harrison (Cabinet Member for Improving Camden's Environment) and Roger Freeman (Heritage Champion).
- 6.17 There was general acceptance of the height, bulk and mass of the proposals subject to securing the package of public benefits proposed. The public realm proposals were described in the formal response as a 'step in the right direction' and the team were further encouraged to look at pedestrianisation of the surrounding streets to maximise the benefits for pedestrians and cyclists. Comments were raised in respect of the following:
1. Delivering a sustainable building which responds positively to its historic context
  2. The specification of the building being tailored to the Knowledge Quarter's specialist uses
  3. That it would be beneficial to have a tenant on board at the time of the application submission
  4. The importance of a strong employment, skills and business support package inclusive of affordable workspace
  5. The relationship with Argyle Square
  6. The public realm proposals for Belgrove Street and Crestfield Street
  7. The affordable housing provision.
- 6.18 The team's response to advice is discussed in the body of this Statement.

## **Design Review Panel Members**

- 6.19 Three Design Review Panel ('DRP') meetings have been held on 21<sup>st</sup> June 2019, 25<sup>th</sup> October 2019 and 26<sup>th</sup> June 2020. The review panels comprise 5 members alongside several key LB Camden Officers who generally choose to brief panel members on the scheme ahead of the review.
  
- 6.20 On 21<sup>st</sup> June 2019, the first Design Review Panel for Belgrove House was held, with Design Panel Review members; Eleanor Fawcett (Chair), Ian Chalk, Mike Martin, Jane Dann and Paddy Pugh.
  
- 6.21 On 25<sup>th</sup> October 2019, the second Belgrove House Design Review Panel was held, with Design Panel Review members; Jane Dann (Chair), Ian Chalk, Mike Martin, Paddy Pugh and Scott Grady.
  
- 6.22 On 26<sup>th</sup> June 2020, the third Belgrove House Design Review Panel was held, with Design Panel Review members; Eleanor Fawcett (Chair) Mike Martin, Ian Chalk, Jane Dann and Paddy Pugh.
  
- 6.23 Comments were raised for the architectural team to investigate further. Key design comments related to the height, scale and massing and public accessibility of the ground floor level.
  
- 6.24 The design team have sought to respond directly to the comments received at the DRP and the design has been amended accordingly. The Design and Access Statement, prepared by AHMM, sets out the design discussions held and shows how the proposed design has evolved in response to comments received.

## **Residents, Neighbours and Other Stakeholders**

- 6.25 The Applicant organised, publicised and carried out an online consultation programme instead of the originally intended strategy due to the implementation of the national lockdown brought on as a result of the Covid-19 pandemic. An online Development Management Forum (DMF) was also held, which resulted in 37 people attending on the evening of the event, and a further 203 views of the recorded event.

- 6.26 The purpose of the DMF was to familiarise local people with the proposals prior to submission and enable local residents, businesses and organisations to ask questions of the applicant and design team and comment on the proposals.

### **Third Parties**

#### The GLA (Greater London Authority)

- 6.27 As part of the pre-application process, the applicant met with the GLA on 18<sup>th</sup> February 2018 and 26<sup>th</sup> February 2020 to discuss the application proposals.
- 6.28 The most recent formal response from the GLA advises that the proposed mix of uses would be supported and in addition the general height and massing seems appropriate for the location.

#### Historic England

- 6.29 A formal response to a meeting held with Historic England was received on 9<sup>th</sup> March 2020. The response concluded no objection in principle to the redevelopment of the existing Belgrove House building, which was concluded to make a neutral contribution to the character and appearance of the conservation area. Whilst it was acknowledged that the proposed new building will result in an appreciable increase in scale along this generally low rise stretch of Euston Road, erasing a legible element of its historic scale and therefore causing some (less than substantial) harm to the significance of the conservation area, it was stated that their assessment of the harm was low. Nonetheless it must be outweighed by the public benefits of the scheme which is set out in the heritage and design sections of this Statement and in the accompanying Townscape and Visual Impact Assessment submitted with this application.
- 6.30 The design team met with the Metropolitan Police on 13<sup>th</sup> May 2020. In summary the proposals were welcomed in their efforts to increase natural surveillance and mitigate against existing antisocial behaviour around argyle square and in the vicinity of the building.

Metropolitan Police

**Environmental Impact Assessment**

- 6.31 On 2<sup>nd</sup> February 2020, a letter was prepared by Trium setting out that whilst the Proposed Developments (in combination) do fall under 10(b) 'Urban Development Projects', as listed in Column 1 of Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), the relevant EIA screening thresholds and the criteria are not met or exceeded and so they do not require a screening opinion under EIA Regulations. This was confirmed by email by LB Camden on 22nd April 2020.

**Summary**

- 6.32 The consultation strategy has been extensive and has sought to engage with statutory and non-statutory consultees including residents, local businesses, community groups and politicians throughout the design process.
- 6.33 The application proposals have been revised, where possible, to reflect comments raised throughout consultation, particularly in relation to the proposed building design, public open space and public realm and affordable housing.
- 6.34 The applicant remains committed to maintaining an open dialogue with locals and stakeholders throughout the determination and construction phases of the proposed development.LB Camden

## 7 Planning Policy Context

- 7.1 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
- a. The London Plan. The London Plan presents the Mayor's spatial development strategy for London. This document has been consolidated with alterations since 2016. Hereinafter this will be referred to as the London Plan ('LP').
  - b. The Camden Local Development Framework ('LDF'). The LDF is made up of Camden's Local Plan (2017) and various adopted Camden Supplementary Planning Guidance documents.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

### National Planning Guidance

#### The National Planning Policy Framework (NPPF) February 2019

- 7.3 The NPPF document sets out the Government's planning policies for England and how these are expected to be applied. It summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
- 7.4 The NPPF introduces the presumption in favour of sustainable development although it makes it clear that the Development Plan is still the starting point for decision making.
- 7.5 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.



- 7.6 One of the core planning principles of the NPPF is that planning should not simply be about scrutiny but instead be “a creative exercise in finding ways to enhance and improve the places in which people live their lives”.
- 7.7 The Ministerial Statement, ‘Planning for Growth’, emphasises the importance of securing economic growth and employment. The document states that when considering planning applications, Local Planning Authorities should support enterprise and facilitate housing, economic and other forms of sustainable development.
- 7.8 In terms of the historic environment, Paragraph 193 of the National Planning Policy Framework sets out that great weight should be given to the conservation of heritage assets. Paragraphs 194-195 set out the tests that need to be met where either ‘substantial harm’ or ‘less than substantial harm’ is caused to heritage assets.
- 7.9 Where any harm is caused the public benefits of the proposal should outweigh this harm.
- 7.10 Chapter 9 of the NPPF sets the expectations in terms of promoting sustainable transport and advises that transport issues should be considered from the earliest stages of plan-making and development proposals in order to address the impacts of a development proposals, to identify opportunities from existing or proposed transport infrastructure in relation to the scale and location of development proposed, to assess any environmental impacts of traffic and infrastructure and to mitigate accordingly, and to take into consideration patterns of movement to ensure transport considerations are integral to the design of schemes.
- 7.11 Chapter 11 of the NPPF relates to making efficient use of land and advises that planning policies and decision should promote an effective use of land in meeting the need for homes and other uses while safeguarding the environment and ensuring safe and healthy living conditions.

## **Planning Practice Guidance, 2014 (as amended)**

- 7.12 The Planning Practice Guidance was produced and published by the Department of Communities and Local Government ('DCLG') in March 2014 and has been varied and supplemented on a number of occasions since.

## **Regional Planning Policy**

### **The London Plan**

- 7.13 The London Plan (as amended, 2016) aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 years. The London Plan includes London-wide planning policy guidance and sets the relevant regional planning policy guidance for the London Borough of Camden and forms a component part of the statutory development plan.
- 7.14 The Mayor considers that the greatest challenge faced in London is to accommodate significant growth in ways that respect and improve London's diverse heritage while delivering the vision for an exemplary, sustainable world city.

### **The draft New London Plan (Intend to Publish)**

- 7.15 The Examination in Public (EiP) on the London Plan was held between 15<sup>th</sup> January and 22<sup>nd</sup> May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor of London on 8<sup>th</sup> October 2019. This was considered by the Mayor and as such an Intend to Publish version was issued back to the Secretary of State on 9<sup>th</sup> December 2019. Given the late stages of the plan, the policies contained within the Intend to Publish version of the New London Plan are a material consideration in the determination of this application and we consider that they attract significant weight.

## **Local Planning Policy: Camden Local Plan (2017)**

- 7.16 At the local level, Camden's Local Plan (2017) was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

## **Supplementary Planning Guidance**

- 7.17 Other relevant LB Camden Supplementary and Design Guidance of relevance to this application includes:

- Camden Planning Guidance - Design (March 2019);
- Camden Planning Guidance - Basements (March 2018);
- Camden Planning Guidance - Employment Sites and Business Premises (March 2018);
- Camden Planning Guidance 3 (CPG3) - Sustainability (July 2015, updated March 2018);
- Camden Planning Guidance - Energy Efficiency and Adaptation (March 2019);
- Camden Planning Guidance - Amenity (March 2018);
- Camden Planning Guidance - Public Open Space (March 2018);
- Camden Planning Guidance - Air Quality (March 2019);
- Camden Planning Guidance - Transport (March 2019);
- Camden Planning Guidance - Trees (March 2019);
- Camden Planning Guidance - Developer Contributions (March 2019); and
- Camden Planning Guidance - Water and Flooding (March 2019).

- 7.18 The following GLA Supplementary Planning Guidance documents are also material considerations:

- Affordable Housing and Viability (August 2017);
- Town Centres (July 2014);
- Accessible London: Achieving an Inclusive Environment (October 2014);
- Shaping Neighbourhoods: Character and Context (June 2014);
- Sustainable Design and Construction (April 2014); and

- The Control of Dust and Emissions during Construction and Demolition (July 2014).

### **Site Specific Allocations**

7.19 Within the Camden Local Development Framework ('LDF'), the site falls directly within the following designations:

- King's Cross Conservation Area;
- Central London Activities Zone;
- Central London Frontage; and
- Primary Protected Frontage.

7.20 Consultation on the draft Site Allocations Plan document took place between 13<sup>th</sup> February and 27<sup>th</sup> March 2020. Belgrove House is contained within the draft site allocations as is the wider Knowledge Quarter. Whilst this draft Plan is at an early stage and little weight can be given to it, it is still a material consideration, and the aspirations of the draft allocations have been taken into account in the assessment of the proposals.

### **Legislative Framework**

7.21 Given the site's location within a conservation area and near to Listed Buildings, statute regarding the historic environment is relevant.

7.22 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

7.23 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest in which it possesses.

7.24 On 21 July 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (the "Regulations" were laid before parliament and will come into force on 01 September 2020. The Regulations revoke Parts A and D of the

Town and Country Planning (Use Class Order) 1987 (as amended) from 01 September 2020.

- 7.25 Regulation 4 of the Regulations provides that if before 01 September 2020 an application for planning permission is submitted which refers to uses or use classes specified in the Town and Country Planning (Use Class Order) 1987 (as amended) (the “Use Classes Order”) as it applies on 31 August 2020, that application must be determined by reference to the Use Classes Order as at 31 August 2020. For the avoidance of any doubt, this application for the Proposed Development is submitted with reference to the Use Classes Order as it applies on 31 August 2020 and must therefore be determined by reference to the Use Classes Order as it applies on 31 August 2020.

### **Principal Planning Matters**

- 7.26 The development proposals have been assessed against the following principal planning matters:
- Land Use;
  - Design;
  - Heritage, Townscape and Views;
  - Environment and Sustainability;
  - Amenity; and
  - Transport and Servicing.

## 8 Land Use

- 8.1 This section assesses the proposals against relevant national, regional and local land use planning policies.

### Context for Development

- 8.2 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.
- 8.3 London Plan policy 7.6 (i) confirms that buildings and structures should optimise the potential of sites. Chapter 1 of the new London Plan sets out how growth should be managed in the Capital to build strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.
- 8.4 The site sits within the Central Activities Zone (CAZ) which covers London's geographic, economic and administrative core. It brings together the largest concentration of London's financial and globally-oriented business services. London Plan Policies 2.10 and 2.11 and Policies SD4 and SD5 of the Mayor's Intend to Publish London Plan support mixed-use development which will enhance and promote the unique international, national and London wide roles of the CAZ.
- 8.5 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site, providing a mix of uses in accessible parts of the Borough (including self-contained housing) to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000 sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be delivered across the Borough, with Central London playing a key role in facilitating that growth.

- 8.6 The site occupies a large and strategically important site within the London Borough of Camden's Central London area which has significant potential for mixed use development.
- 8.7 The site is situated just south of the King's Cross Opportunity Area, which the London Plan identifies and promotes as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.
- 8.8 The site is an allocated development site in Camden's Draft Site Allocations Development Plan Document. The site is allocated for an employment-led mixed-use development, in particular uses related to the knowledge and innovation economy and permanent self-contained homes.
- 8.9 The Proposed Development seeks to optimise previously developed urban land, which is exceptionally well served by public transport. The Proposed Development is in accordance with the character and established mix of uses in the surrounding area. The development will replace an outdated building with a state of the art life science office and research and development facility directly related to the knowledge and innovation economy, consistent with the NPPF, London Plan policy 7.6, and Local Plan Policy G1.

## Office and Research and Development

### National Planning Policy Framework (2019)

- 8.10 At a national level, the NPPF sets out the Government's commitment to securing economic growth and advises that plans should support an economy fit for the twenty first century. Paragraph 80 of the NPPF states that [inter alia] '**significant weight should be placed on the need to support economic growth and productivity, taking into account wider opportunities for development**'.
- 8.11 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local Planning Authorities should consider the importance of national planning policies aimed

at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect benefits such as increased consumer choice, more viable communities and more robust local economies.

#### The London Plan (2016)

- 8.12 At a regional level, the London Plan identifies the Site as a location where office use is supported in so far as it recognises that the CAZ is the country's most important strategic office location. Policy 2.10 recognises the CAZ as being at the heart of London's world city offer and identifies a strategic priority to promote and coordinate development to provide a competitive, integrated and varied global business location. Whilst Policy 2.11 aims to ensure that development proposals to increase office floorspace within CAZ
- 8.13 London Plan Policy 4.2 encourages boroughs to support the management and mixed-use development and redevelopment of office provision. Policy 4.2 (D) specifically supports increases in current stock where there is evidence of sustained demand.
- 8.14 London Plan Policy 4.2 goes on to state that the Mayor will consolidate and extend the strengths of the diverse office markets elsewhere in the capital by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable, complementary uses. It also states that renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility will be supported. Increases in current stock will be supported where there is a strategic and local evidence of sustained demand for office-based activities.

#### New London Plan (Intend to Publish) (2019)

- 8.15 Policy SD4 of the Intend to Publish version of the new London Plan relates to the CAZ and identifies uses connected with science, technology, media, communications and cultural sectors of regional, national and international importance as one of the strategic



functions. The supporting text goes onto identifying important clusters within the CAZ and highlights creative industries and life sciences of one of these.

- 8.16 Policy E1 part A states that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.
- 8.17 Part D Policy E1 goes on to state that the diverse office markets in outer and inner London (outside the areas identified area) should be consolidated and, where viable - extended.

#### Camden Local Plan (2017)

- 8.18 At a local level, Camden Local Plan Policy E1 explains that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. In order to do so the policy says the Council will:
- a) **support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;**
  - b) **maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;**
  - c) **support local enterprise development, employment and training schemes for Camden residents;**
  - d) **encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;**
  - e) **support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;**
  - f) **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;**

- g) support Camden's industries by**
  - i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;**
  - ii. supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;**
  - iii. safeguarding the Kentish Town Industry Area; iv. promoting and protecting the jewellery industry in Hatton Garden;**
- h) expect the provision of high-speed digital infrastructure in all employment developments; and**
- i) recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.**

8.19 Policy E2 of the Local Plan relates to Employment Premises and Sites and sets the policy context for the provision of new employment premises in the borough. More specifically the wording of the policy states that LB Camden will consider a higher intensity redevelopment of sites that are considered suitable for continued business on the following conditions:

- c) 'the level of employment floorspace is increased or at least maintained;**
- d) the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;**
- e) it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;**
- f) the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;**
- g) the scheme would increase employment opportunities for local residents, including training and apprenticeships;**
- h) the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and**

- i) for larger employment sites, any redevelopment is part of a comprehensive scheme.'

Camden Draft Site Allocations (2019)

8.20 Draft Policy KQ1 relates to the Knowledge Quarter and sets out clearly that major development proposals for additional employment, research and/or learning floorspace must achieve the following:

- **'Demonstrate that they have been developed in a collaborative way with other key stakeholders in the wider innovation district and potentially beyond to meet the needs of the knowledge sector**
- **Be supported by evidence that the type of floorspace being provided appropriately reflects current and emerging needs of the knowledge economy and would complement and support other institutions and companies that contribute directly to the success of the innovation district**
- **Seek to prioritise the creation of suitable floorspace for priority growth sectors within the district such as life sciences, digital collections and machine learning**
- **Provide for a suitable mix of workspace types including business accelerators, start-up and move on spaces**
- **Ensure that buildings are designed to support future reconfiguration for different activities and where possible include flexible floorplates, plant room and mechanical and electrical systems that allow a change from offices to laboratories**
- **Ensure that at least 20% of additional employment floorspace is affordable workspace**
- **Ensure development and its occupiers contribute to reducing inequalities and increasing life chances in neighbouring communities and the borough generally through maximising social value at the planning, construction and end user phases, including supporting increased access to jobs, skills training and education opportunities. Social value frameworks should be used to secure commitments to ensure that nobody gets left behind**

- **Contribute towards the provision of new physical and social infrastructure to support the Knowledge Quarter Innovation District, such as new homes, public realm enhancements and transportation improvements including transforming pedestrian and cyclist movement within, around and across the Euston Road corridor.'**
- 8.21 In addition to this, the draft policy sets out that development proposals coming forward for specific sites within the Knowledge Quarter Innovation District, must accord with any relevant individual site allocations.
- 8.22 Belgrove House is included in the draft site allocations as an individual site allocated for employment-led mixed-use development, in particular, for uses related to the knowledge and innovation economy.

#### Assessment

- 8.23 The site is not a protected industrial site; however, in view of its current use for self-storage, it is considered non-designated industrial land (Class B8).
- 8.24 Policy E7 of the Mayor's intend to publish London Plan states that mixed-use or residential developments on non-designated industrial sites should be supported when: the site has been allocated in an adopted local development plan document for residential or mixed-use development; or, industrial, storage or distribution floorspace is provided as part of mixed-use intensification. Whilst it is at an early stage in its preparation, the site has been identified in Camden's draft Site Allocations Development Plan Document for an employment led mixed use development.
- 8.25 In respect of pat d) of Policy E2 which relates to retaining the existing building on site as far as possible in particular to industry, light industry and warehouse and logistic uses, the redevelopment of Belgrove House will provide a significant increase in the number of jobs on site, (approximately 3FTE jobs in the existing Access Self Storage use in comparison with over 800FTE jobs anticipated from a life sciences tenant). Given the building is to be occupied by a major life sciences tenant in the heart of the knowledge quarter and given the increase in employment on site, the aims of part d) of

the policy are met in so far as the redevelopment supports both the function of the CAZ and the aspirations of the local economy as the emerging knowledge quarter.

- 8.26 In the context of the UK's leading research into the contribution that the life sciences sector makes to the economy, the proposal for the redevelopment of Belgrove House is set to contribute significantly to the Government's commitment to fostering the UK and London as a global standard-bearer for discovery and advanced manufacturing which will in turn deliver huge benefits to the UK, both the national population through to the local communities in the heart of which this development sits.
- 8.27 As set out in Section 3 of this statement, the site is located in the heart of Camden's Knowledge Quarter Innovation District which is described as the home to a world-class cluster of scientific and knowledge-based institutions for companies that specialise in areas such as life-sciences, data and technology and creative industries. Owing to the site's location in amongst this cluster and to the site's excellent access to both national and international transportation hubs, it is ideally suited to a building that seeks to harbour innovation, research and development that will impact not just the lives of local people but will that will nationally contribute to London and the UK as a centre for excellence in leading medical advancements in terms of medicines, vaccines and services.
- 8.28 At a local policy level, paragraph 5.23, the supporting text to Local Plan policy E1 relates specifically to the Knowledge Quarter and the science growth sector and states that [Camden] **will support the development of these industries and promote the development of the Knowledge Quarter around Euston and King's Cross.** The proposals brought about by the redevelopment of Belgrove House will undoubtedly contribute significantly to the Knowledge Quarter and will reinforce its overall vision and emerging reputation as a world-class knowledge hub for the 21st Century which seeks to raise awareness and leveraged support for innovation, collaboration and knowledge exchange.
- 8.29 As set out in Section 1 of this Statement, the proposals have very much been developed with the four strategic priorities of the Knowledge Quarter Partnership at its core and have been informed by commercial discussions with the proposed tenant of the building, MSD.

- 8.30 Policy SD4 of the Intend to Publish version of the New London Plan identifies that nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, inclusive of the intensification and provision of sufficient space to meet a range of types and sizes of occupier. Part G of the policy goes onto identify that the CAZ should be supported as a centre of excellence and advises that the specialist clusters including functions of state, health, law, education, creative and cultural activities should be supported and promoted. Local Plan Policy E1 part E specifically identifies that Knowledge Quarter and advises that development within the Knowledge Quarter should be promoted. The proposed use of Belgrove House for life sciences laboratory floorspace and office space is therefore supported by all levels of policy.
- 8.31 Part F of the Local Plan policy E1 encourages premises to include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable. As Belgrove House is proposed to be a headquarters building suitable for a life sciences tenant comprising laboratory and associated office write-up floorspace, it is not possible to locate the affordable workspace on site. It has therefore been agreed with officers to locate an element of affordable workspace at Acorn House across ground and lower ground floors. The redevelopment of Acorn House is constrained in terms of the height and massing achievable owing to the proximity of listed buildings on Swinton Street and height of neighbouring buildings in its context. In favour of maximising the amount of affordable housing achievable on site at Acorn House in accordance with policy, the amount of affordable workspace proposed is 476 sqm.
- 8.32 It is acknowledged that the emerging KQ1 policy in respect of affordable workspace seeks 20% of additional employment floorspace as affordable. For the reasons set out above, this is not achievable within these proposals and given the draft status of the emerging policy, it can only be afforded limited weight in the determination of the applications.

## **Mixed Use**

- 8.33 Chapter 5 of the NPPF provides a framework for delivering a sufficient supply of homes by setting out how Local Authorities should assess, and plan for housing need to be met through sufficient land being available to meet housing need.
- 8.34 Policy 4.3 of the London Plan states that within the CAZ a mix of office and residential floorspace uses are provided. Draft Policy SD5 of the Intend to Publish Version of the New London Plan states that offices and other CAZ strategic functions are to be given greater weight relative to new residential in all other areas of the CAZ.
- 8.35 Paragraph 1.3.3 of the CAZ SPG sets out that offices and other CAZ strategic functions should be given greater weight relative to new residential development.
- 8.36 Policy H1 of the Local Plan sets out that self-contained housing is the priority land use across the Borough.
- 8.37 Policy H2 of the Local Plan seeks to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of uses across the Borough. The policy requires where more than 200sqm GIA of non-residential development is proposed in the Central London Area, 50% of the additional floorspace will be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant.
- 8.38 Policy H2 states that when considering whether self-contained housing is required as part of a mix of uses the Council will take into account:
- a) the character of the development, the site and the area;**
  - b) site size, and any constraints on developing the site for a mix of uses;**
  - c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;**

- d) **whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;**
- e) **whether the development is publicly funded or serves a public purpose.**
- f) **the need to add to community safety by providing an active street frontage and natural surveillance;**
- g) **the extent of any additional floorspace needed for an existing user;**
- h) **the impact of a mix of uses on the efficiency and overall quantum of development;**
- i) **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; and**
- j) **whether an alternative approach could better meet the objectives of this policy and the Local Plan.**

### Assessment

- 8.39 From the outset, the project team considered the potential for the site to accommodate housing as part of a mix of uses. Having considered the criteria in Policy H2 and the overall objectives of the development plan, it is considered that an off-site housing proposal is the most appropriate proposal in this circumstance. This has been agreed with Camden officers. The conclusions having regard to the criteria in Policy H2 are summarised below:

### **Criterion a**

- 8.40 The Proposed Development at Belgrove House is for a building housing laboratory space, lab-enabled floorspace and supporting write-up office floorspace, suitable for occupation by a science-based research operation to support the KQ as a world-class cluster of science and knowledge-based institutions.



- 8.41 The Local Plan makes reference to needing to strike a balance between the need to meet the space requirements of a particular activity or user and the priority given to housing. In order to best meet the needs of the Knowledge Quarter and the science and innovation economy the floorspace proposed at Belgrove House is required for laboratory, write up and office space. This is supported by a letter from MSD (Appendix B), the building's proposed occupier, where it is confirmed that MSD require the whole floorspace proposed as their new UK Headquarters and Discovery Centre.

### **Criteria b & h**

- 8.42 The height, bulk and mass of the proposed development has been rigorously tested and revised throughout the pre-application process. The overall development envelope has been informed by the site's context which allows for a taller block on Euston Road with the height stepping down to address the lower scale buildings to the south. The rectangular lower floors are ideally suited to laboratory and write up space whilst the smaller square floors above, fronting Euston Road, provide the necessary office and administration floorspace required by any large life science operator.
- 8.43 The inclusion of residential floorspace on site would push the development envelope beyond what would be considered acceptable from a townscape and heritage perspective. If the residential floorspace was included within the proposed development envelope the building would not meet the specific requirements of the life science sector.

### **Criterion j**

- 8.44 In terms of the other planning objectives, there is a need for new employment floorspace in Camden. As specified in the draft site allocations, there is also a need for employment floorspace specifically related to the knowledge and innovation economy.
- 8.45 As well as providing laboratory, office and collaboration space, the proposed development includes publicly accessible exhibition space, a publicly accessible auditorium, events space, meeting rooms, a café, a restaurant and a new step free London Underground entrance.

- 8.46 In conjunction with this application, a planning application is submitted for 33 new affordable homes at Acorn House, a 4-minute walk away from the site on the corner of Swinton Street and Gray's Inn Road. The proposals for Acorn House also incorporate approximately 500 sq.m. of affordable workspace, and a retail unit. The two permissions will be linked by a S106 Agreement.
- 8.47 It is accepted by Officers that an off-site housing proposal in this particular circumstance represents the best opportunity to meet the objectives of the Local Plan in providing dedicated life science floorspace and other associated benefits at Belgrove House and new affordable housing and affordable workspace at Acorn House.
- 8.48 The total additional non-residential floorspace proposed across both sites is 10,988 sq.m and therefore this represents the off-site housing target. The amount of housing being proposed at Acorn House is 3,412 sq.m which represents 31% of the housing requirement. All of the housing proposed at Acorn House is affordable. For the balance of the policy requirement a policy compliant payment in lieu of £9.86 million to the Council's affordable housing fund would be secured via Section 106 Legal Agreement. The payment covers the shortfall in the physical delivery of market and affordable housing in accordance with policy
- 8.49 The proposed mixed use development is considered to accord with the themes of the NPPF and London Plan, and more specifically Camden's mixed use policy requirements.

## 9 Design

- 9.1 This section reviews the proposals against relevant national, regional and local planning policy in term of design.
- 9.2 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.

### National Planning Policy Framework (2019)

- 9.3 At a national level the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Chapter 12).
- 9.4 Paragraph 124 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 9.5 Paragraph 127 of the NPPF states that development should function well and add to the overall quality of the area over the lifetime of the development. In pursuance of this development should be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness.
- 9.6 While achieving this, development should optimise the potential use of the site including delivering an appropriate mix of green and public space. The application of policy should not discourage appropriate innovation or change. Design quality should be considered throughout the evolution and assessment of individual proposals.
- 9.7 The NPPF identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 185).

## Planning Practice Guidance

- 9.8 Paragraph 4 of the PPG on Design (2019), states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. It states that planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).
- 9.9 Paragraph 15 of the PPG on Design states that that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:
- be functional;
  - support mixed uses and tenures;
  - include successful public spaces;
  - be adaptable and resilient;
  - have a distinctive character;
  - be attractive; and
  - encourage ease of movement.

## The London Plan (2016)

- 9.10 At a regional level, London Plan Policy 7.1 requires good quality environments to be provided which have the best possible access to services, infrastructure and public transport. It states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.

- 9.11 Policies 5.3 and 7.2 of the London Plan seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.
- 9.12 London Plan Policies 7.4 and 7.5 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.
- 9.13 London Plan policy 7.6 sets out a series of overarching design principles for development in London, seeking to incorporate the highest quality materials and design appropriate to its context. The policy seeks building and structures to be inter alia:
- 1) Of the highest architectural quality;
  - 2) Of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
  - 3) Comprise details and materials that complement;
  - 4) Incorporate best practice in resource management and climate change mitigation; and
  - 5) Meet the principles of inclusive design.

Intend to Publish' version of the Draft New London Plan (2019)

- 9.14 'The 'Intend to Publish' version of the draft New London Plan policy D4 – Delivering good design, states that the design of development proposals should be thoroughly scrutinised. The scrutiny of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The Design and Access Statement should explain the approach taken to these design issues.
- 9.15 Policy D5 relating to Inclusive Design requires development proposals to achieve the highest standards of accessible and inclusive design. Design and Access Statements for development proposals should include an inclusive Design Statement. When

dealing with historic buildings and heritage assets, careful consideration should be given to inclusive design at an early stage.

- 9.16 Policy SI 7 Reducing Waste and supporting the circular economy seeks to promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. The policy required referable applications to submit a standalone Circular Economy Statement.

#### Camden Local Plan (2017)

- 9.17 At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use. To achieve this, Camden will require that development:
- a) respects local context and character;
  - b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
  - c) is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
  - d) is of sustainable and durable construction and adaptable to different activities and land uses;
  - e) comprises details and materials that are of high quality and complement the local character;
  - f) integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
  - g) is inclusive and accessible for all;
  - h) promotes health;
  - i) is secure and designed to minimise crime and antisocial behaviour;
  - j) responds to natural features and preserves gardens and other open space; incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
  - k) incorporates outdoor amenity space;
  - l) preserves strategic and local views;
  - m) for housing, provides a high standard of accommodation; and

- n) carefully integrates building services equipment.

9.18 This policy reflects the London Plan design and principles and goes on to state that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- a) The character, setting, context and form and scale of neighbouring buildings;
- b) The quality of materials to be used;
- c) The provision of visually interesting frontages at street level;
- d) The appropriate location for building services equipment;
- e) The provision of appropriate hard and soft landscaping; and
- f) The provision of appropriate amenity space.

9.19 Camden has also published a Planning Guidance SPD (March 2019) which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape. The key messages are to consider:

- a) The context of a development and its surrounding area;
- b) The design of the building itself;
- c) The use and function of the building;
- d) Using good quality sustainable materials;
- e) Creating well connected public spaces and good quality public realm;
- f) Opportunities for promoting health and wellbeing; and
- g) Opportunities for improving the character and quality of an area.

### Assessment

9.20 The design approach to the redevelopment of Belgrove House has very much been centred on two factors; the first being the historic setting of the site which includes two Grade I listed buildings opposite, nearby Grade II listed buildings and from being within and adjacent to a conservation area; and the second being the whole life carbon approach which seeks to reduce the carbon impact of the building both during construction in so far as the materials and methods of construction used, in addition to the reducing the in use carbon impact of the building.

9.21 Noting the site's proximity to the Grade I listed King's Cross and St Pancras Chambers the design team were tasked with designing a building of the highest design quality which respects its context and at the same time presents an exemplar building with sustainability and innovation at its core, suitable to house the UK Headquarters and Discovery Centre of MSD. As part of this process, the design has been informed by a series of design workshops with LB Camden planning, design and conservation officers, meetings with Historic England and the GLA and in addition the team have presented to Camden's Strategic Review Panel and presented to Camden's Design Review Panel on three occasions. In summary the design team derived 4 principles which informed the architectural approach to Belgrove House:

1. An exemplar knowledge quarter building
2. Building for a changing climate
3. Responding to urban context
4. Benefitting the community

9.22 Following the first meeting with the Design Review Panel in June 2019, the overriding advice was that the building should become one of London's great new contemporary buildings. In discussion with officers prior to this meeting, it was expressed by officers that they would like to see an inspirational building that speaks of innovation contained within a Knowledge Quarter building. As detailed in the consultation section and in the SCI, the proposals were presented to panel members on two further occasions. Whilst there were conflicting opinions relating to the design, this is to be expected resulting from presentation to varying panels on each occasion. The balance of opinion from the three DRP's were support for the design approach and this is supported by the conclusions of both Historic England and the GLA.

9.23 The building has been designed to provide a landmark frontage to King's Cross Square, a central arrival point for visitors to London. A stepped approach to the massing of the building is proposed at ground plus 9 storeys fronting Euston Road and King's Cross Square stepping down to ground plus 4 storeys on Argyle Square with two basement levels and terraces at fourth and fifth floors. The building stepping up to the north responds to the civic scale of buildings along Euston Road and the lower massing responds to the differing character of lower scale building surrounding Argyle Square. At fourth and fifth floors the elevations are set back, stepping out again above this on the north, east and west sides of the north part of the building,



creating a two-storey recessed horizontal band. The design development of the scale and massing of the building and how it has evolved through consultation is detailed in the accompanying Design and Access Statement. Overall the scale and massing is considered to be appropriate to the context of the site, sitting below St Pancras Clock Tower at its tallest point and akin to the height of the Standard Hotel to the west, albeit marginally lower. The stepping down of the massing to 5 storeys fronting Argyle Square respects the lower scale of buildings around the square.

- 9.24 The response to the historic setting of Belgrove House is discussed in greater detail in both the heritage section of this statement and in the accompanying Heritage and Townscape Assessment submitted with this application. The formal pre-application response received from the GLA considered the bulk, scale and mass of the proposals **‘generally acceptable’** for the area. In this regard the proposals meet part a) of Local Plan policy D1 which requires development to respect local context and character and part b) relating to preserving and enhancing the historic environment. Additionally, the step down in massing responds to the open character of Argyle Square and thus meeting part j) of policy D1.
- 9.25 Building on the relationship between Belgrove House and those experiencing it from outside, the Euston Road façade will be glazed to enable a picture window for passers-by into activity happening inside the building. The contemporary approach to the architecture of the building symbolises the building as an incubator for innovation and is indicative of the scientific and medical advances that a building of this nature has the potential to facilitate. In this regard, the proposals meet the council’s expectations for ‘excellence in design’ and seeks to ensure that significant growth is planned for and will be provided through high quality and contextual design (Policy D1 – Design).
- 9.26 The laboratory spaces are located in the northern half of floors 1-3 so to address King’s Cross Square and to provide the animation as described above to the facades. By locating the dedicated office write-up space in the southern half of floors 1-3, the building both reflects MSD’s direct requirements and additionally allows for planted winter gardens and external balcony zones to Argyle Square. Notwithstanding MSD’s requirements, Belgrove House has been designed flexibly so that it is suitable for a range of life sciences and knowledge quarter tenants not solely for MSD.

- 9.27 Building on the principle of activating the surrounding streets, the retail, café and auditorium entrances work well with the public realm strategy to create a lively streetscape and encourage people into the ground floor of the building ensuring inclusivity and accessibility in the design in line with the aims of part g) of Local Plan Policy D1. Together with the proposed public realm improvements to St Chad's Street, the office glazing and the terrace that is proposed at Levels 4 and 5 that overlook Argyle Square will increase natural surveillance in the locality naturally mitigating existing issues of antisocial behaviour. This is a principle welcomed both during pre-application consultation with LB Camden's officers and in addition by consultation with the Metropolitan Police. The proposals therefore meet the requirements of policy D1 part f) in that it integrates well with surrounding streets and open spaces and in addition, part i) in that it has been designed to minimise crime and antisocial behaviour. Additionally, the provision of the terraces at levels 4 and 5 meet the tests of part k) and part l) of the policy which requires developments to incorporate high quality design and outdoor amenity space.
- 9.28 Further to the flexible design of the building, typical office buildings often have their service risers embedded in the core and therefore are able to adapt to changing needs over time. By locating the risers externally and in highly accessible positions on the facades, allowances are made for future retrofit and upgrades throughout the life of the building. To accommodate the risers on the outside of the building, a small area of the highway is proposed to be stopped up. In this regard the design meets the requirements set out in paragraph 7.8 of the Local Plan which requires buildings to **'be durable in construction and where appropriate should be flexible and adaptable to a range of uses over time,'** thus meeting part D of Local Plan policy D1 in relation to design.
- 9.29 A whole life carbon approach has been used to assess how all aspects of the building's carbon footprint can be minimised. This data has been a key design tool from an early stage in the development of the proposals. Using the RIBA's whole life carbon assessment criteria, the design brief has been developed in line with the objectives as set out in the design and access statement. The components of the assessment are:
- Embodied emissions to completion

- Embodied emissions over life cycle
  - Operational emissions
  - Occupant well-being
- 9.30 Simple structural forms use the minimum of material for a given floor area. This can have a bigger effect on the amount of carbon used than the material choice. The building is configured as two highly efficient 33m squares on a 10m x 10m primary grid with a central core. The need for structural transfers is minimised as much as possible throughout the scheme, avoiding the embodied carbon linked to the additional concrete volume required for transfers, and in the subsequent increase in foundation capacity.
- 9.31 Analysis into the structural frame resulted in a post-tensioned concrete frame being the lowest-carbon option owing to the inherent efficiency of the construction minimising the material volume. Whilst it is acknowledged that concrete is not typically considered to be a low embodied carbon-material, emerging technologies in concrete production allow for a reduction in the carbon footprint of the concrete used within the frame.
- 9.32 The facade design at Belgrove House has been developed to meet the specific demands of energy reduction in line with the low-carbon design agenda, in addition to providing for a building that combines laboratory and office uses. Double-skin façade zones serve the upper floors 5-9. The façade design provides shading to south, east and west elevations through its depth, reducing solar gain and the energy required to cool the office spaces. A single skin façade serves the laboratory areas on floors 1-3 providing the necessary environmental enclosure for research activity. In selected areas, planting will be provided within the double skin zone. Owing to the changing climate across the year in these zones, the planting strategy is being developed in dialogue with landscape specialists to ensure healthy, verdant planting throughout the year.
- 9.33 Studies into employee well-being and productivity showed that access to and visibility to planting creates significant benefits. It has therefore been ensured that all users of

the building will have a visual connection with nature by virtue of the biophilic façade and the planting on the terrace at levels 4 and 5.

- 9.34 There is also an environmental benefit to the biophilic façade which is that the planting will provide a degree of solar-shading to the south, east and west facades. The planting strategy is detailed further in the landscape section of this statement.
- 9.35 The seasonal environmental design strategy allows for passive ventilation through varied operation of opening windows and external glazed louvre elements. This strategy further reduces the energy demand of the building in operation, reducing the volume of air required in mechanical ventilation, for certain months of the year.
- 9.36 In line with the low-carbon strategy for the design of the building, the recycling and re-use of building materials will be pursued where possible thus responding to Circular Economy principles. This is assessed in greater detail in the standalone Circular Economy Statement submitted with the application.
- 9.37 There is a resource of c. 1500m<sup>2</sup> bricks in the existing building and a requirement for c. 4250m<sup>2</sup> in the new building. It is likely that some bricks will be unable to be reused in the construction of this building but where possible, brick processing will be carried out on site to minimise the carbon impact from transportation for an off-site solution. Additional reclaimed bricks may be sourced from UK-based specialist suppliers.

### Conclusion

- 9.38 The site offers an opportunity to house a knowledge quarter building suitable for occupation by a major life sciences tenant. The existing building is underutilised despite its strategic location opposite King's Cross and St Pancras stations. There is a significant opportunity for a well-designed and high-quality mixed-use development that would set a new benchmark for how the new generation of buildings can address the climate change emergency.
- 9.39 As detailed above, a comprehensive Design and Access Statement is submitted with the application which assesses the application proposals, provides detailed design justification and illustrates how the design has evolved during the life of the project, through consultation with LB Camden, Historic England, the GLA and other key

stakeholders and ultimately how the design of the building has been informed by both the historic environment in which it sits and by the principles of the whole life carbon approach. The proposals have been designed having regard to national, regional and local planning policy.

## 10 Heritage, Townscape and Views

- 10.1 This section considers the Proposed Development against relevant national, regional and local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape. This section also considers the Proposed Development in respect of townscape views and impact on heritage assets, notably the setting of the Grade I Listed St Pancras and King's Cross Stations and King's Cross and Bloomsbury Conservation Areas.
- 10.2 A full analysis of the impact of the proposed development on designated heritage assets is included within the submitted Townscape, Visual Impact and Heritage Assessment ("TVIHA"), prepared by Peter Stewart Consultancy and Miller Hare and submitted as part of the application and should be read alongside this Section of this Statement.

### Policy and Statutory Context

- 10.3 Section 66(1) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.4 Section 72 of the 1990 Act also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 10.5 The Government has attached great importance to conserving and enhancing the historic environment at Chapter 16 of the NPPF.
- 10.6 Paragraph 187 of the NPPF sets out that local planning authorities should maintain, or have access to a historic environment record containing up to date evidence to assess the significance of heritage assets and the contribution they make, and predict the

likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

- 10.7 Paragraph 189 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 10.8 As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 10.9 Paragraph 192 of the NPPF states that in determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
  - The desirability of new development making a positive contribution to local character and distinctiveness.
- 10.10 Paragraph 193 states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 10.11 Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

- 10.12 The NPPG on Conserving and Enhancing the Historic Environment provides further guidance in assessing the impact of development proposals which effect heritage assets. It sets out that “significance” derives not only from a heritage asset’s physical presence, but also from its setting. It sets out that “Public Benefits” may follow from many developments and could be anything that delivers economic, social or environmental objectives as described at Paragraph 8 of the NPPF.
- 10.13 London Plan Policy 2.10 seeks to sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components and other features including distinctive buildings and historic heritage, through high quality design and urban management.
- 10.14 London Plan Policy 7.8 states that development should identify, value, conserve, restore and reuse and incorporate heritage assets where appropriate. Development which affects heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.
- 10.15 The policy goes on to state that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible be made available to the public on-site. Where the archaeological or memorial assets cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. This position is supported at draft policy HC1 of the New London Plan.
- 10.16 London Plan Policy 7.12 states new development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view.
- 10.17 Policy D2 of the Local Plan states that the Council will preserve and where appropriate, enhance Camden’s rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that



results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.

- 10.18 In respect of archaeology, the policy states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.
- 10.19 The King's Cross Conservation Area Statement was issued in 2004 describes the history, character and appearance of the conservation area.

### Assessment

- 10.20 Belgrove House lies in the King's Cross Conservation Area in the London Borough of Camden. There is an adopted Conservation Area Statement ('CAS') dated June 2004. Belgrove House is described at paragraph 4.2.100 of the CAS as follows:

**'Belgrove House, situated at nos. 13-21 Euston Road, is a three-storey building of 1950s date constructed of brown brick with sandstone window surrounds at first floor level and an elevated central section also constructed of sandstone. It is built on the footprint of the early 20th century King's Cross coach station. The façade includes a range of signage, which is poorly integrated with the building's elevation.'**

This is the only reference to the building in the CAS.

- 10.21 Buildings which make a positive or negative contribution to the conservation area are identified on a map on page 7 of the CAS; this does not show Belgrove House as a positive contributor (nor as a negative contributor). There is no suggestion in the CAS that Belgrove House makes a positive contribution to the CA. During pre-application consultation with LB Camden Design and Conservation Officers, officers formed the view that the existing building makes a positive contribution to the CA and that the demolition of the building would have to be justified by a benefits case.
- 10.22 Historic England's conclusion was that whilst the existing building is a robust building with some decorative embellishment fronting Euston Road, overall it is architecturally uninspiring. Furthermore, they stated no objection to the redevelopment of the

existing Belgrove House which for the reasons set out in the body of their response, makes a neutral contribution to the character and appearance of the conservation area.

- 10.23 The assessment in the accompanying TVIHA prepared by Peter Stewart Consultancy identifies that the existing building does not make a positive contribution to the character of the CA and any positive qualities that it could be argued to have could easily be replicated in a replacement building. The TVHIA concludes that the Proposed Development will deliver significant street edge enhancements to an otherwise underwhelming street frontage and so enhance the character and appearance of the CA.
- 10.24 With regard to the Bloomsbury Conservation Area, the TVIHA states that its setting particularly to the north and in the area in which the Site lies, has undergone significant change since the development of this part of Bloomsbury. As such the TVIHA concludes that the Proposed Development would enhance the setting of the listed buildings around Argyle Square and this part of the Bloomsbury CA, by enhancing the northern edge of the square.
- 10.25 The setting of King's Cross Station and St Pancras Station, the former Midland Grand Hotel and the Great Northern Hotel has also undergone significant change during the lifetime of the buildings. The settings have continued to evolve in recent decades, particularly with the recent redevelopment of the area to the north and developments along Euston Road, many of which are seen in conjunction with the clock tower of St Pancras Chambers. The TVIHA concludes that the Proposed Development would enhance the townscape character on this stretch of Euston Road, and would enhance the setting of the listed stations.
- 10.26 In terms of material palette selected by AHMM, the Proposed Development deploys a limited palette of materials which have been carefully chosen with the context of these listed buildings and the wider area in mind. The opinion formed in the TVIHA is that it is appropriate for its location.
- 10.27 As set out above, the TVIHA, prepared by Peter Stewart Consultancy advises that there is no harm to the significance of any heritage asset. However, as a worst case any harm that is considered to be caused could only be said to be 'less than

substantial' as defined in the NPPF, and at the lower end of such a scale of harm. Historic England found such harm in respect of the King's Cross Conservation Area and others could be considered there to be less than substantial harm to the setting of the Bloomsbury Conservation Area. Such harm would be outweighed by the public benefits the scheme delivers.

10.28 The proposed development will deliver the following benefits:

#### Environmental

- Targeting BREEAM Outstanding with a minimum commitment to BREEAM Excellent
- Target to reduce on-site operational regulated carbon dioxide emissions by 43%
- All electric building with no combustion on site during normal operation
- Innovative double skin façade providing solar control to occupied spaces and enabling the upper office floors to be naturally ventilated
- Biophilic design maximising the amount of natural planting promoting good mental health
- Roof mounted photovoltaics
- Green roof terraces with biodiversity measures
- Rainwater harvesting for irrigation and greywater recycling for toilet flushing
- Detailed embodied carbon assessment to reduce embodied carbon in construction materials
- Diversion of demolition and construction waste for reuse and recycling
- Contributing to substantial improvements to the public realm both along the frontage of Euston Road, and in the context of Argyle Square and the surrounding uses.
- Closure of St Chads Street to vehicles and creation of a new pedestrianised landscaped public space
- Sustainable Urban Drainage
- Removal of LUL boxes and incorporation of an underground entrance providing step free access to King's Cross Station south of the Euston Road
- Participating in the future discussions with regard to the redesign of Argyle Square

- Encouraging sustainable transport options such as cycling and walking to reduce pollution from transport.

### Social

- 33 new affordable homes at Acorn House, Gray's Inn Road (4 mins walk from Belgrove House)
- A tenure split of 60% social rent and 40% intermediate rent
- Dedicated children's playspace
- Community room and terrace for all residents
- New, flexible affordable workspace at Acorn House
- Potential for relocation of the Post Office within Acorn House
- A new café available for use by the general public
- New event space and auditorium available for use by the general public, subject to a detailed management plan
- Publicly accessible ground floor, including potential Knowledge Centre and exhibition space, subject to detailed management plan

### Economic

- Over 1,000 jobs during the construction period first targeted at Camden residents and then via Central London First
- Approximately £5.8m spent by construction workers in the surrounding area during the construction period which equates to £1.9m annually which will support surrounding local businesses.
- Work placements and apprenticeships during the construction period
- Over 800 jobs during operation
- Apprenticeships made available each year in the completed development within a range of roles
- Promotion of the Camden STEAM Commission objectives amongst end users and occupiers
- Requiring living wage as a minimum salary for all local employers
- Maximising the opportunities for local businesses to supply goods and services at the construction and end user phases.

- 10.29 Included in the TVIHA submitted with the application is an assessment of individual views which were agreed to be tested and submitted with the application during pre-application discussions with LB Camden. There are 19 'AVR's' (Accurate Visual Representations) that are included in the assessment submitted. These represent a professional judgement of the likely effect of the Development on the view or the townscape.
- 10.30 As set out in the TVIHA and the accompanying Design and Access Statement, the Proposed Development has been carefully designed to respond to the Site and its context. The new building, which replaces an existing building of little presence or interest, offers distinctive architecture of high quality and would be a positive addition to the local area. The Proposed Development would deliver high quality office and laboratory space, appropriate for the area, and would result in significant enhancements to the Site. Offering significant public realm improvements, it would animate and activate the street frontages and enhance the sense of place to both Argyle Square and King's Cross Square, creating a stronger connection between the two areas. It would complement the varied details and materials of the listed buildings in the area
- 10.31 The design is based on a clear understanding of the Site and its context, including its heritage context and the heritage significance of the King's Cross CA, the Bloomsbury CA, and the listed buildings close to the Site, all of which have been considered during the process of developing the design. In respect of the design considered in its own right and the relationship between the Proposed Development and the heritage assets in its context, the effect will be positive. The Proposed Development holds the promise of enhancing the quality of the townscape of the area and the character and appearance of the King's Cross CA.
- 10.32 The TVIHA sets out that whilst it is acknowledged that the Proposed Development will have a direct effect with regards to the King's Cross Conservation Area, special attention has been paid to the preservation or enhancement of the character and appearance of this CA. The conclusions of the TVIHA therefore are that the existing Belgrove House does not contribute positively to the significance of the King's Cross Conservation Area and any perceived less than substantial harm has clearly been outweighed by the extensive public benefits listed above. In this regard the design of

the Proposed Development has had regard to the criteria in the Planning (Listed Buildings and Conservation Areas) Act (1990) and in respect of design and built heritage considerations, it is in line with the policies and guidance set out in the NPPF and PPG; London Plan policies; and local policies and guidance.

- 10.33 Cumulatively, the Proposed Development would see the delivery of environmental, economic and social public benefits which when considered holistically are substantial. In line with Paragraph 196 of the NPPF, it is our opinion that these substantial public benefits significantly outweigh any harm that could be perceived as a result of the Proposed Development.

## 11 Landscape and Public Realm

- 11.1 This section considers the ambition for the public realm and landscaping proposed for the surrounding streets of the Site. It does not consider the detailed proposals in respect of changes to vehicular traffic flow and cycle routes. This is considered in Section 13 relating to Transport and Servicing.
- 11.2 ITP Policy G5 of the New London Plan sets a new requirement for major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature based-sustainable change. The policy advises boroughs to set their own scores but advise 0.4 for development that are primarily residential and 0.3 for predominantly commercial developments. The policy sets out how this score is calculated.
- 11.3 At a local level, Camden Local Plan Policy A2 Open Space seeks to protect and enhance access to open space and green infrastructure within the borough. Policy A2 (m) states that new development proposals within the London Borough of Camden will be required to apply a standard of 9 sqm per occupant for residential schemes and 0.74 sqm for commercial developments while taking into account any funding for open spaces through the Community Infrastructure Levy.
- 11.4 Local Plan Policy A2 (n) states that priority will be given to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision.
- 11.5 Paragraph 6.49, the description of Local Plan Policy A2, specifically references the use of financial contributions to create useable spaces such as widening of pavements as it is identified that this can often be a challenge in densely developed areas.

### Assessment

- 11.6 An extensive public realm strategy has been designed by the landscape architects appointed on the project, Bradley Hole Schoenaich Landscape Architects (BHSLA)

which will contribute towards the provision of new physical and social infrastructure to support the Knowledge Quarter Innovation District including transforming pedestrian and cyclist movement around the site.

- 11.7 BHSLA were involved in the King's Cross regeneration project in respect of the public realm in King's Cross Square between King's Cross Station and St Pancras. It is the intention to extend the high quality of public realm improvements around King's Cross and St Pancras Stations, towards Argyle Square with improved tree planting along Belgrove and Crestfield Street, removal of the tube boxes on Euston Road to free up the pavement from pedestrian obstruction, the incorporation of rain gardens and traffic calming measures along Crestfield Street to further improve the pedestrian environment.
- 11.8 The streets surrounding the existing building are dominated by vehicles, loading facilities without pavements, narrow pavements with bollards and bin storage. The teams integrated design approach and green agenda as detailed in the accompanying DAS provides proposals for a building and public realm that improves health and well-being and mitigates urban heat islands by providing space for green infrastructure at all levels in adjacent streets, Argyle Square and throughout the building.
- 11.9 The building's ground floor is proposed to be publicly accessible and so the public realm proposals for the surrounding streets have been designed to connect visually with internal areas to invite visitors into the building. The removal of the tube boxes on Euston Road will create more spacious pavement which will ease pedestrian congestion at peak times and will create opportunities for tree planting which will improve the quality of the pedestrian environment.
- 11.10 The proposed closure of St Chad's Street to traffic is with the aim of increasing activity and encouraging both members of the community and tenants of the building to utilise the space to respond to existing issues with antisocial behaviour in the area and ultimately to improve relationship of the Belgrove House, Argyle Square and the streets surrounding it. In this regard the aims of draft policy KQ1 are responded to in so far as the proposals incorporate public realm enhancements and seek to transform the pedestrian environment in the area.



- 11.11 The ambition for Crestfield Street is for it to become a green link between Euston Road to Argyle Square and the neighbourhoods to the south of Belgrove House. Belgrove Street will retain a contraflow cycle lane, space for the Santander bike hire and will be the main access points for cycle storage within Belgrove House.
- 11.12 The proposed public realm and highways works fall outside the red line and as such an obligation either for direct provision by the Application, or a financial contribution for the Council to provide and maintain the works will be secured in the S106 Agreement. The landscaping proposals inclusive of the tree planting strategy have been informed both by surveys to identify the location of underground services and by input from the structural team on the project to ensure that they are deliverable in conjunction with underground services and additionally the proposals at basement level. In this regard the aims of Local Plan Policy A2 are met which specifically references the use of financial contributions to create useable spaces.
- 11.13 The application proposals achieve an Urban Greening Factor (UGF) score of 0.3 thus complying with ITP London Plan policy G5. The accompanying Design and Access Statement submitted with the application sets out in detail how this has been achieved. In this regard, the proposals meet the requirements of ITP policy G5.

## 12 Energy and Sustainability

### Policy

- 12.1 The NPPF sets out the Government's overarching planning policies regarding the delivery of sustainable development through the planning system. Chapter 14 of the document identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 12.2 At a national level paragraph 150 of the NPPF states that new development should avoid increased vulnerability to the range of impacts arising from climate change, help reduce greenhouse gas emissions. The NPPF states that in achieving this, the location, orientation and design of development should be considered.
- 12.3 Paragraph 154 of the NPPF states that when determining applications for renewable and low carbon development, local planning authorities should approve the application if its impacts are (or can be made) acceptable.
- 12.4 In accordance with National level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 12.5 Policy 5.2 requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- a) Be lean - use less energy;
  - b) Be clean - supply energy efficiently;
  - c) Be green - use renewable energy.
- 12.6 London Plan Policy 5.2 also requires, for both residential and non-residential development, a reduction in carbon emissions of 40% beyond 2010 Part L. The GLA

has subsequently published guidance confirming that this is broadly equivalent to a 35% reduction beyond 2013 Part L.

- 12.7 Policy 5.3 of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- 12.8 Policy 5.6 of the London Plan requires all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions.
- 12.9 London Plan Policy 5.7 outlines that the Mayor seeks to increase the proportion of energy generated from renewable sources, and all major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 12.10 The Mayor's Sustainable Design and Construction SPG (2014) advises that Developments should contribute to ensuring resilient energy infrastructure and a reliable energy supply, including from local low and zero carbon sources. It also sets out the following design measures for improving the sustainability of developments: -
  - optimise natural daylight;
  - optimise solar gain;
  - optimise insulation; - optimise air tightness;
  - optimise thermal mass;
  - Incorporate green infrastructure; and
- 12.11 Maximise potential for natural ventilation.
- 12.12 The Intend to Publish version of the New London Policy SI2 relates to minimising greenhouse gas emissions and states that major development should be net-zero carbon which means reducing greenhouse gas emissions in operation and minimising

both annual and peak energy demand in accordance with the energy hierarchy as set out:

- **be lean: use less energy and manage demand during operation**
- **be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly**
- **be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site**
- **be seen: monitor, verify and report on energy performance**

12.13 Part C of the above policy states the requirement for a minimum on-site reduction of 35% beyond building regulations for major developments and that major commercial developments should achieve 15% through energy efficiency measures. Any shortfall should either be provided by a payment in lieu or off-site. Part F of the policy states the requirement for referable development to calculate the whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment.

12.14 The Intend to Publish Version of the London Plan Policy S14 states development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

12.15 The Intend to Publish Version of the London Plan Policy S17 related to reducing waste and supporting the circular economy. Policy states that referable applications should promote circular economy outcomes and aim to be net-zero waste. A Circular Economy Statement is required to be submitted to demonstrate:

- **How all materials arising from demolition and remediation works will be re-used and/or recycled**
- **How the proposals design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life**
- **Opportunities for managing as much waste as possible on site**

- **Adequate and easily accessible storage space and collection systems to support recycling and re-use**
  - **How much waste the proposal is expected to generate and how and where the waste will be managed in accordance with the waste hierarchy**
  - **How performance will be monitored and reported.**
- 12.16 At a local level, through Local Plan Policy CC1 Camden requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan. The policy clearly requires all proposals for substantial demolition to demonstrate that it is not possible to retain the existing building.
- 12.17 In support of these objectives Camden requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 12.18 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.
- 12.19 Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.
- 12.20 In March 2019 LB Camden updated the Camden Planning Guidance ‘Energy Efficiency and Adaptation’ to ensure that the Council’s commitment to reducing carbon emissions is achieved. Moreover, Camden Planning Guidance ‘Sustainability’ (July 2015, updated March 2018) gives further guidance with respect to the principles of sustainability.

### Assessment

- 12.21 The proposals for the redevelopment of Belgrove House have been developed with the principle of sustainability and the whole life-cycle carbon approach at its core in order to achieve a building that is exemplar in sustainable development and leads the

way for future buildings in terms of energy efficiency and carbon reduction. The applicant is fully committed to exceeding energy and sustainability targets set by regional and local planning policy in order to achieve this.

- 12.22 The application is accompanied by an Energy and Sustainability Assessment (inclusive of a whole life-cycle carbon assessment), in addition to a Circular Economy Statement prepared by Atelier 10.
- 12.23 The Energy and Sustainability Statement sets out how the proposed redevelopment of Belgrove House, meets both local and regional policy requirements. Given the advanced stage of the preparation of the New London Plan, the proposals have been assessed against the requirements of the Intend to Publish version of the Draft New London Plan (Dec 2019).
- 12.24 The proposed redevelopment will reduce carbon emissions by 43% over a Notional Building as per Part L of the Building Regulations 2013. This meets the 35% emission reduction as set out in part c of ITP policy SI2. The reduction in carbon emissions achieved through demand reductions measures (i.e. 'be lean' stage of the ITP Policy SI12) will be 20% and so exceeds the 15% reduction target proposed in the Intend to Publish London Plan.
- 12.25 The remaining 57% of the carbon emissions associated with the redevelopment will be mitigated by a payment in lieu to the London Borough of Camden at a rate of £95/tonne.
- 12.26 Be seen is the newest addition to the GLA's energy hierarchy introduced as part of the Intend to Publish London Plan. It requires developments to predict, monitor, verify and improve their energy performance during actual operation. Sub-meters will measure electricity, heating and cooling energy use as part of the building energy and power monitoring system. This will be configured to provide energy consumption data to each user group/ functional space/tenancy within the building. It will also be linked to the building energy management system (BEMS), thus enabling data capture and storage for long term review and optimal operation.
- 12.27 Development proposals referable to the Mayor should calculate whole life cycle carbon emissions in line with the ITP New London Plan, through a nationally

recognised Whole Life- Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. This is included in the Energy and Sustainability Assessment (section 6 & appendix H) submitted with the application and has enabled the design team to identify 'hotspots' with potentially large embodied carbon impacts so that they can be addressed in the proposed design.

- 12.28 As set out in the accompanying Design and Access Statement, the existing building is unsuitable for use as a significant facility for a Knowledge Quarter Building that may wish to undertake research work. This is because the existing structural frame and floor-to-ceiling heights would not accommodate the level of servicing required for a lab-enabled space. The proportions of the existing space would not suit the development of headquarter-style office accommodation. In this respect, the application demonstrates why the existing building cannot be retained and as such meets the requirements of Local Plan policy CC1.
- 12.29 As the operational energy use associated with carbon emissions of new buildings decline, the relative importance of the embodied carbon emitted during their construction increases. For contemporary buildings in London, embodied carbon emitted up until their completion can be greater than the operational emissions due to their energy use throughout their lifetime. Emitted during an intense period of manufacture and construction even before the building is occupied can lead to more damage than carbon emitted gradually through usage of the building. In response the approach to addressing embodied carbon and utilising a whole life-cycle approach to carbon and has driven many technical design decisions as detailed in the accompanying Energy and Sustainability report. An example of this is the existing building on site was found to be not fit for refurbishment and so the reuse of the existing building materials was fundamental to the design of the proposed building which significantly reduces waste and reduces the embodied carbon footprint.
- 12.30 As described in the Detailed Circular Economy Statement, circular economy principles will be adopted throughout the selective demolition, construction, operation and end of life stages of the Proposed Development. Wherever feasible, non-hazardous demolition and construction waste will be reused in place, recovered on or off site, salvaged or reclaimed, returned to the supplier, or recycled or composted, in this order of priority. Reuse of existing materials and equipment will be prioritised where possible. This will promote resource efficiency and effective management and

reduction of construction waste. Where reuse is not possible, construction materials will be sorted into separate recycling streams either on-site or off-site and diverted from landfill. In planning policy terms, this meets the requirement of ITP London Plan Policy S17.



## **BREEAM**

- 12.31 The redevelopment of Belgrove House will target BREEAM 'outstanding' with a minimum commitment to BREEAM 'excellent'. The full details of the BREEAM pre-assessment have been submitted with this planning application.

## **Flooding, Drainage and SUDs**

- 12.32 At a national level, paragraph 165 of the NPPF (2019) specifies that major developments should incorporate sustainable drainage systems, unless there is clear evidence that this would not be appropriate.
- 12.33 At a regional level, Policy 5.11 contained within the London Plan states that the proper consideration of flood risk is vital to ensuring that London is and continues to be a sustainable city.
- 12.34 At a local level, Camden Local Plan Policy CC2 advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- 12.35 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 12.36 Camden Planning Guidance 'Water and Flooding' (2019) states that the Council expects all developments, whether new or existing buildings, to be designed to be water efficient by minimising water use and maximising the re-use of water.

## **Assessment**

- 12.37 As detailed in the Flood Risk Assessment submitted, and in accordance with the National Planning Policy Framework, the Site would be categorised as lying within Flood Zone 1 - an area assessed as having less than 1 in 1000 annual probability of river flooding (0.1%). Also, in accordance with the NPPF, the proposed development is classified as 'less vulnerable.' The FRA submitted shows that there is no requirement for the exception test or the sequential test to be carried out. The

assessment concludes that the site has been assessed as being at very low probability from all sources of flooding. In this regard the proposals meet the test of Local Plan Policy CC3 in so far as the risk of flooding is not increased by the proposed development.

## 13 Amenity

- 13.1 This section of the Statement assesses the proposals against policy relating to the amenity of nearby existing residents in terms of air quality, noise and daylight and sunlight.

### Air Quality

- 13.2 At a national level, NPPF paragraph 180 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development. In pursuance of this development proposals should mitigate and reduce to minimum potential adverse impacts in amenity.
- 13.3 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 170).
- 13.4 At a regional level, London Plan Policy 7.4 requires that development proposals should be “at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality.
- 13.5 London Plan Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas). Sustainable design and construction should be promoted to reduce emissions from the construction of buildings, and proposed development should be at least ‘air quality neutral’.
- 13.6 The GLA Housing SPG Standard 33 requires development to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMA)s).

13.7 NLP Policy SI1 aims to tackle poor air quality, protect health and meet legal obligations by ensuring development proposals should not:

- a) lead to further deterioration of existing poor air quality;**
- b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;**
- c) create unacceptable risk of high levels of exposure to poor air quality.**

13.8 At a local level, Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.

13.9 Camden Supplementary Planning Guidance on Amenity states that all of Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). As such all developments are to limit their impact on local air quality. An Air Quality Assessment is required to support any scheme which proposes uses susceptible to poor air quality, such as housing.

13.10 Camden Planning Guidance 'Air Quality' states that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality ('air quality positive').

13.11 The demolition and construction phases of development on air quality must be taken into account as part of planning applications. Mitigation and offsetting measures to deal with any negative air quality impacts associated with development must be implemented.

13.12 The London Borough of Camden has, since 2000, been designated an Air Quality Management Area. The Camden Air Quality Action Plan (2016) sets out a variety of actions to help reduce key air pollutants in the Borough arising from road traffic, gas boilers and other sources. Action 14 seeks to minimise emissions from the construction and operation of new developments by requiring developers to adhere

to current and any superseding best practice guidance and supplementary planning guidance.

### Assessment

- 13.13 The Air Quality Assessment, prepared by Air Quality Consultants, details the assessment of the existing air quality conditions at, and in the vicinity of, the site; as well as the potential changes in air quality arising from the construction and operation of the proposed development. The document considers appropriate mitigation measures to ensure that any adverse effects on air quality are minimised.
- 13.14 The construction works have the potential to create dust. It is therefore recommended that it be necessary to apply a package of mitigation measures to minimise dust emissions. Standard planning conditions should be adequate to ensure this. With these measures in place, it is expected that any residual effects will be 'not significant'.
- 13.15 The assessment advises that the proposed development will lead to increases in traffic on local roads. Impacts at existing receptors will be negligible and there will be no significant effects on air quality.
- 13.16 The overall operational air quality effects of the development are thus judged to be "not significant" and therefore comply with local regional and national policy in respect of air quality.
- 13.17 The Proposed Development therefore complies with London Plan policy 7.14, Draft London Plan policy SI1 and Local Plan policy CC4.

### **Daylight / Sunlight**

- 13.18 Access to daylight and sunlight is important for general amenity, health and wellbeing, as well as bringing warmth into homes thereby reducing the energy consumption. As such it is crucial the development proposals include good levels of daylight and sunlight accessibility.

- 13.19 London Housing SPG Standard 32 advises that all homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.
- 13.20 Camden Local Plan Policy A1 seeks [inter alia] to protect daylight/sunlight values within existing and proposed development. The text at paragraph 6.5 supporting Policy A1 states that in assessing daylight/sunlight values Camden will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011).
- 13.21 The Building Research Establishment (BRE) document Site Layout Planning for Daylight and Sunlight (2011) sets out guidance for achieving good sunlight and daylight levels within buildings and the open spaces between them.
- 13.22 The BRE guidelines are not mandatory, though local planning authorities will consider the suitability of a proposed scheme for a site within the context of BRE guidance. Consideration will be given to the urban context within which a scheme is located.
- 13.23 In regard to daylight and sunlight Camden's Amenity CPG states that they will:
- Expect all buildings to receive adequate daylight and sunlight.
  - Daylight and sunlight reports will be required where there is potential to reduce existing levels of daylight and sunlight.
  - Base our considerations on the Average Daylight Factor and Vertical Sky Component.

### Assessment

- 13.24 EB7 were appointed at early stages of the design development of these proposals to assess the effects of the proposed scheme upon the nearest residential neighbours. A report has been submitted with this application.
- 13.25 The results of the tests in respect of daylight/sunlight have shown that whilst there will be noticeable effects to some of the neighbouring properties as detailed in the

accompanying daylight and sunlight assessment, the effects will be isolated and have been minimised through design by incorporating the lower element of the scheme towards the south of the site where the majority of residential accommodation is located.

- 13.26 The assessment of sunlight amenity (overshadowing) the amenity spaces surrounding the sites show full compliance with BRE targets. The developments impact on the neighbouring amenity spaces is therefore considered to be consistent with the BRE guidance and Camden's Local Plan policy A1.
- 13.27 On balance there, the conclusions of the daylight, sunlight report submitted conclude that the proposals are acceptable in terms of their impact on daylight and sunlight and therefore comply with the relevant local, regional and national planning policy.

## Noise

- 13.28 The NPPF contains guidance on noise management in planning decisions. Paragraph 180 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise'.
- 13.29 Policy 7.15 of the London Plan, 'Reducing Noise and Enhancing Soundscapes' aims to support the Mayor's Ambient Noise Strategy. The reduction of noise resulting from developments, and screening of them from major noise sources, is sought under this policy.
- 13.30 At a local level, Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.

- 13.31 Camden Planning Guidance Document 6 'Amenity' supports Local Plan Policy A4, setting out when planning applications must be supported by noise reports and what mitigation measures can be implemented to prevent harm to amenity being caused.

#### Assessment

- 13.32 An environmental noise and vibration survey has been prepared by Sandy Brown and submitted with this application to assess the existing noise levels in the area surrounding Belgrove House.
- 13.33 The background sound levels measured during the survey are used as the basis for setting limits for noise emission from proposed building services plant. Based on the requirements of LB Camden and the results of the survey, the reports sets out that noise limits in which the plant must operate cumulatively, within 1m from the worst affected windows of nearby noise sensitive receptors. Additionally, the reports sets out the noise limits in which emergency plant must not exceed.
- 13.34 Ambient sound levels are used to assess building envelope sound insulation requirements to achieve appropriate internal noise levels for residences. The report submitted sets out internal and external noise limits based on Camden requirements and an overall façade sound insulation performance to the events space.
- 13.35 Vibration levels were used to assess the degree to which the proposed development will be affected by tactile vibration and re-radiated noise from the Circle, Victoria, Piccadilly and Northern tube line which pass beneath the development. As detailed in the Acoustic report, it is not considered that the tactile vibration is likely to be problematic for the development.
- 13.36 The proposals in this regard comply with Local Plan Policy A4 in that the report submitted sets out a number of mitigation measure to ensure that noise and vibration from development is controlled.



## 14 Transport and Servicing

14.1 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 108 of the NPPF states it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- safe and suitable access to the site can be achieved for all users;
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

14.2 Paragraph 103 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.

14.3 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Furthermore paragraph 104 states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

14.4 Paragraph 148 of the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.

14.5 At a regional level, one of the strategic objectives of the London Plan is to improve accessibility, making London an easier city to move around and making public transport and the pedestrian environment accessible to everyone. The Mayor's

Transport Strategy sets out policies and proposals to achieve the goals set out in the Plan.

14.6 London Plan Policy 6.1 ‘Strategic Approach’ examines the integration of transport and development and as such:

- Encourages patterns and forms of development that reduce the need to travel especially by car;
- Seeks to improve public transport capacity and accessibility where it is needed, for areas of greatest demand and areas designated for development and regeneration, including the CAZ and Opportunity Areas;
- Supports, in general, high trip generating development only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect levels of public transport accessibility;
- Supports measures that encourage shifts to more sustainable modes and appropriate demand management; and
- Promotes walking by ensuring an improved urban realm.

14.7 London Plan Policy 6.3 states that “development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed”. The policy also indicates that “transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice Guidelines for major planning applications. Workplace and/or Residential Travel Plans should be provided for planning applications exceeding the threshold in, and produced in accordance with, the relevant TfL guidance. Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans”.

14.8 London Plan policy 6.10 indicates that the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian and street environment.

- 14.9 The Mayor's Transport Strategy (2010) sets out policies and proposals to achieve the goals set out in the London Plan providing a vision of London as an exemplary sustainable world city.
- 14.10 The 'Intend to Publish' version of the Draft New London Plan, Policy T5 sets out minimum cycle parking standards for new developments. For office (Class B1) use, Table 10.2 requires one space per 75 sqm GEA for long stay cycle parking, whilst for short stay cycle parking, the requirements are 1 space per 500sqm GEA for the first 5,000sqm, and thereafter 1 space per 5,000sqm GEA. For retail use (Class A1), Table 10.2 requires one space per 250sqm GEA for long stay cycle parking, and one space per 60 sqm GEA for short stay cycle parking. For Class A2-A4, the requirements are one space per 175 sqm GEA for long stay, and 1 space per 20 sqm GEA short stay.
- 14.11 At a local level, Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.
- 14.12 Policy T1 promotes the prioritisation of walking in the borough and supports improvements to the pedestrian environment by supporting high quality public realm improvement works and the provision of high-quality safe road crossings where needed and seating.
- 14.13 Policy T1 (g) states that Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within Camden's Transport CPG.
- 14.14 Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.
- 14.15 To assess the overall implications of developments LB Camden, under policy T4, expects the submission of a Transport Assessment, Delivery and Servicing

Management Plan and Construction Management Plan where the implications of proposals are significant.

- 14.16 On 15 March 2019 Camden adopted the 'Transport' CPG which provides information on all types of detailed transport issues within the borough including assessing transport impact, travel plans, delivery and servicing plans and cycling facilities.

#### Assessment

- 14.17 The site is exceptionally accessible by a number of modes of public transport, with a good network of cycle facilities and public transport services nearby, largely owing to its proximity to national and international stations providing access both to the north of England and Scotland and additionally to international destinations such as Paris, Amsterdam and Brussels.
- 14.18 The site has an excellent level of accessibility to public transport services reflected by a PTAL rating of '6b'. The nearest bus stops are located on Euston Road within a 150-200m walk of the site, whilst King's Cross Station and St Pancras Station are located within a 320m walking distance.
- 14.19 A Transport Assessment (TA) and Travel Plan (TP) prepared by TTP consulting has been prepared and submitted with this application in addition to a Delivery and Servicing Management Plan (DSMP) prepared by Watermans. Together these documents assess the likely transport implications arising from the proposed development and set out the proposed cycle parking, access and servicing arrangements. They can be enforced by the Council through the imposition of an appropriately worded condition.
- 14.20 The proposals in transport terms can be summarised as follows
- **The closure of St Chad's Street to vehicles in favour of pedestrianisation of the street whilst retaining two-way access for cycles;**
  - **Removal of the contraflow cycle lane on Crestfield Street;**
  - **Provision of a footway on Belgrove and Crestfield Street;**
  - **Incorporation of a new step-free entrance to King's Cross LUL station adjoining the existing subway under Euston Road;**

- **Removal of existing tube boxes on Euston Road and tree planting along Euston Road;**
- **Cycle Parking at the basement level of Belgrove House; and**
- **Provision of a new delivery and servicing bay on Crestfield Street in place of the existing and provision of a new loading bay on Belgrove Street.**

### **Belgrove Street, Crestfield Street and St Chad's Street**

- 14.21 The application includes detailed proposals for the streets surrounding Belgrove House in order to improve the relationship of the building with the pedestrian environment surrounding it. The development is proposed to be car-free which is considered appropriate given the accessibility of the site and the unlikelihood that anyone would need to rely on private car access to the site. Blue Badge holders will still be able to park in the vicinity of the site if necessary. In this regard the proposals comply with Local Plan policy T1 which advises of Camden's expectation that new-development in the borough is car-free.
- 14.22 The public realm proposals for the site incorporate the closure of St Chad's Street to vehicular traffic in favour of pedestrianisation of St Chad's. A two-way cycle lane will be provided which will provide access for cyclists via Argyle Street to Euston Road where the existing crossing is located. The pedestrianisation of St Chad's Street would create a high quality landscaped and informal seating and breakout space both for tenants of the building and for the wider community. This area would also be used informally in connection with the café at ground floor level which is open to both tenants of the building and the public. Vehicle users would be re-routed around Argyle Square either to continue along St Chad's Street or towards Argyle Street. The TA includes an assessment of existing activity on St Chad's Street and as such it is not considered that the proposals in this regard would give rise to unacceptable impacts from displacement of traffic routes. The proposals demonstrate the applicant's ambition to support high-quality public realm improvements and therefore demonstrate compliance with Local Plan policy T1.
- 14.23 Crestfield Street currently has two-way access for both cycles and vehicles between Euston Road and Argyle Square. It is proposed to retain one-way access for vehicles as this is one of the only existing left turns for vehicles from Euston Road that provides

access to Bloomsbury. However, owing to space constraints it is proposed to remove the contraflow cycle lane to accommodate pavement widening and tree planting which would prevent cycles turning left onto Euston Road from Crestfield Street. Cyclists will need to use the signal-controlled junction of Argyle Street. to access Euston Road which is considered acceptable in terms of the existing capacity on Belgrove Street for cycles. It is considered that the proposals in this regard meet the tests of local plan policy T1 in so far as they prioritise the improvement of the pedestrian environment by proposing high quality public realm works (LP Policy T1(a)).

- 14.24 A similar strategy is proposed for Belgrove Street to improve the pedestrian environment in the vicinity of the site. The transport assessment includes a detailed analysis of activity on the side streets surrounding the sites and demonstrates that the streets are underutilised both in terms of vehicle movements and parking. It was found that the side streets are used as informal waiting areas for taxis. This is perhaps owing to the fact that there are very few residential units surrounding the site, hence the parking bays are under used. Therefore, it is not considered that the public realm proposals will give rise to unacceptable impacts in terms of parking displacement.

### **New Step-free access to King's Cross Underground Station**

- 14.25 The proposals include a new step-free access to King's Cross underground station from the northwest corner of the proposed building. This will provide step-free access to both tenants of the building and the public to the existing subway beneath Euston Road which provides access to the underground station. The new entrance is proposed in place of the existing tube box on Euston Road which significantly obstructs pedestrian flows along Euston Road and visually detracts from the streetscape and the setting of King's Cross and St Pancras Tower opposite. There is an ambition to also remove the second tube box which is outside the Megaro Hotel on the opposite side of Belgrove Street to Belgrove House however, this is subject to discussion with TfL in respect of whether the replacement of the two tube boxes with a single entrance from Belgrove House would be adequate in terms of fire escape regulations. In planning policy terms, the proposals to incorporate the new step-free access contributes towards improvement of public transport infrastructure in accordance with Local Plan policy T3 – Transport Infrastructure.

## **Cycle Parking**

- 14.26 The development proposals will provide 347 long stay cycle parking spaces across all land uses at the development site. The cycle parking standards contained within the Intend to Publish version of the New London Plan have therefore been applied to the development. The long-stay cycle parking provision is in line with ITP policy T5 which sets out cycle parking requirements,
- 14.27 The cycle spaces will be provided at basement 1 level and will be accessed by a dedicated cycle entrance of Belgrove Street. The cycle storage is accessed via 3no. cycle lifts and so is accessible without the need to use stair access and in addition, the number of lifts proposed will ensure that waiting times are kept to a minimum. The alternative means of access is via a staircase. Changing and shower facilities and lockers are also proposed to be located adjacent to the cycle parking also at basement 1 level, the level of which is provided in accordance with the Intend to Publish version of the New London Plan. Short-stay cycle parking in the form of Sheffield stands which will be located within the public realm proposed and complies with ITP London Plan standards.

## **Delivery Servicing and Waste Management**

- 14.28 There are 2no. loading bays proposed on Belgrove Street and on Crestfield Street which will be utilised for deliveries to and the servicing of Belgrove House.
- 14.29 It is proposed that tenants of the building will not be allowed to have personal deliveries to the building as this would have a significant effect on the level of delivery activity to the building. TfL estimate that in general 40% of office deliveries are personal items. The Transport Assessment includes details of swept path analysis which demonstrates that vehicles can safely access all on site and on street loading areas. The proposed delivery and serving arrangements of the building have been discussed in detail with highways officers at LB Camden and Delivery and Servicing Management Plan sets out the agreed strategy in detail and demonstrates that the proposed strategy is safe and efficient. In policy terms, local plan policy T4 is therefore complied with which requires developers to submit such details with applications over 2,500sqm.

## Trip Generation

- 14.30 In order to determine the net effect of the development proposals, the number of trips forecast to be generated as a result of the proposed development has been compared with the operation of the existing site. The trip generation of the proposed development considers the Use Class B1 land use of the development given the existing site already has a fast-food and 3no retail units, therefore these trips are already in the area. The trip generation anticipated should the floorspace be office floorspace in its entirety is likely to be higher and therefore the assessment has been made on that basis.
- 14.31 As set out in the Transport Assessment, it is identified that there are 139 different rail and underground services accessible from the site with over 200 services per hour in total. Given the frequency of underground and overground train services operating in the vicinity of the site, it is considered that this level of increase in trip generation would not have a noticeable effect on the operation of these modes of transport.
- 14.32 As set out in the Transport Assessment, it is identified that 139 buses an hour stop in the vicinity of the site. The development could therefore result in an average increase of less than one passenger per bus, which is unlikely to change the nature of the operation of local services.
- 14.33 The development is car free and census data as set out in the TA indicates that staff would travel by public transport, on foot or bicycle. The development should therefore generate few vehicle trips, with activity associated solely with deliveries and servicing and occasional taxi trips. As such, the net effect of the development on the vehicular trip attraction of the site would be negligible.
- 14.34 The increase in trips associated with the development is not considered likely to have a noticeable effect on the surrounding public transport, pedestrian and cyclist networks and the public realm proposals will enhance the area surrounding the site for tenants of the new development and people that currently live and work in the area in line with the Healthy Streets objectives. The proposals in this regard accord with Local Plan Policy A1 – Managing the impact of development whereby LB Camden



advise that the quality of life of occupiers and residents will be protected with transport impacts from a development as a consideration..

## Conclusion

14.35 The proposed development is considered to meet the objectives of current national, regional and local planning policy for a number of reasons including:

- The proposed development supports the NPPF's objective, to promote more sustainable transport choices and to promote accessibility to jobs and services; thereby reducing the need to travel;
- The site has excellent access to public transport with its proximity to both national and international transport hubs of King's Cross and St Pancras, many local bus services and underground services within short walking distance from the site. This fulfils and number of policy objectives;
- Secure cycle parking and associated facilities for cyclists will be provided in compliance with the Intend to Publish version of the New London Plan; and
- The redevelopment of Belgrove House is proposed to be car-free.

14.36 An assessment of the effects of the proposed development on the local transport network has concluded that it will not result in a material impact on the network. As outlined, the majority of the trips will be undertaken by sustainable modes (public transport and active modes), with very few private vehicle trips.

14.37 The proposals have been shown to comply with national, regional and local transport planning policy.

14.38 The Transport, Delivery and Servicing arrangements are covered in further detail within the Transport Assessment, Travel Plan and Delivery and Servicing Management Plan (and their associated appendices), prepared by TTP and Watermans, which accompany this application.

## 15 Other Considerations

### Basements

- 15.1 Camden Local Plan Policy states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
- a) neighbouring properties;
  - b) the structural, ground, or water conditions of the area;
  - c) the character and amenity of the area;
  - d) the architectural character of the building; and
  - e) the significance of heritage assets.
- 15.2 Camden Basements CPG gives detailed guidance with respect to new basement development, specifically their siting, location, scale and design.
- 15.3 The CPG advises that the Council strongly encourages applicants to use the Council's Basement Impact Assessment ('BIA') proforma to ensure that all aspects of potential impact are addressed, a BIA of which is included as part of this application

### Assessment

- 15.4 A Basement Impact Assessment ('BIA'), prepared by AKT II, has been prepared in support of this application and gives an overview of the substructure and the basement considerations in the context of the proposed development.
- 15.5 The BIA has assessed the ground measurement and the impacts of the proposed development on neighbouring structures and has identified that it will be Category 1 (very slight) using the Burland Scale as set out in the report.
- 15.6 The report has analysed the preliminary ground movements related to the construction of Belgrove House and the located utilities that could potentially be

affected by the movements. Based on the preliminary movements calculated, a low risk of damage is predicted.

- 15.7 The BIA does not identify any potential impact on the wider hydrological environment as confirmed by the Flood Risk Assessment also submitted with this application.
- 15.8 The BIA has identified a very low flood risk to the proposed development. No mitigation measures are required however, a betterment on the existing condition has been proposed by the introduction of a sustainable urban drainage system.
- 15.9 The Site itself has been assessed as being at a very low risk from surface water flooding. However, there is a low risk of surface water flooding on Argyle Square to the south of the Site, on Belgrove Street to the west of the Site and at the junction of Euston Road and Crestfield Street to the east of the Site. In addition, a medium to high flood risk for Euston Road to the north of the Site.
- 15.10 The proposed redevelopment has an acceptable flood risk within the terms and requirements of the National Planning Policy Framework.

### **Archaeology**

- 15.11 Camden Local Plan Policy D2 states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

### **Assessment**

- 15.12 An archaeological desk-based assessment has been submitted with this planning permission and details that the site does not lie with an archaeological priority area (APA). Archaeological survival potential across the site is likely to be low reflecting the presence of a basement covering the full extent of the site.

15.13 Given that the site is not located within an APA and that the existing basement covering the extent of the site will have removed all archaeological remains within its footprint it is unlikely that further investigation will be required.

15.14 The report advises that if it is considered that further archaeological investigation work is required, it is suggested that the most appropriate investigation strategy is likely to entail the monitoring of geotechnical pits dug for engineering purposes. The results of the evaluation would allow an informed decision to be made in respect of an appropriate scope for the archaeological mitigation strategy.

### **Land Contamination**

15.15 Policy A1 of the Camden Local Plan stipulates that the Council will seek to protect the quality of life of occupiers and neighbours. The factors the Council will consider include [inter alia] contaminated land.

### **Assessment**

15.16 A preliminary ground investigation report has been prepared by Soiltechnics and submitted with this application.

15.17 As no source of chemical contamination has been identified on site, the preliminary investigation concludes that the site represents a low risk of causing harm to the health of site users.

### **Trees**

15.18 Camden Local Plan Policy A3 states that the Council will protect, and seek to secure additional, trees and vegetation. Specifically, Policy A3 stipulates that the Council will [inter alia]:

- expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development;

- expect developments to incorporate additional trees and vegetation wherever possible.

15.19 Camden Planning Guidance on Trees outlines that [inter alia] using British Standard BS5837:2012 the Council will aim to increase and improve tree coverage in the design of new developments and through planning contributions

#### Assessment

15.20 An Arboricultural Survey, Method Statement and Impact Assessment has been submitted with the application, Based on the assessment, trees recommended for retention in this report can be protected during the construction period and successfully integrated into the site post development and so the proposals therefore accord with Local Plan Policy A3,

#### **Ecology**

15.21 The application is accompanied by a Preliminary Ecological Appraisal prepared by PJC and concludes that the Site comprises no semi-natural habitat and is isolated within a highly urbanised environment. No adverse impacts on designated sites and protected and notable habitats and species are therefore anticipated.

#### **Microclimate**

15.22 Local Plan policy A1 in relation to 'managing the impact of development,' Policy A1 Managing the impact of development states that the Council will seek to protect the quality of life of occupiers and neighbours. As listed, microclimate is listed as a consideration taken into account in assessing the impacts from the development on amenity.

### Assessment

- 15.23 A qualitative desk study was carried out to assess the acceptability of the external wind conditions around the existing and proposed Belgrove House development based on the Lawson LDDC comfort and safety criteria. A summary of the assessment results are as follows:
- 15.24 The additional height of the development and the exposure of the site are expected to alter the local wind environment. However, the design of the development incorporates the following beneficial elements:
- the 'stepped' massing of the proposed development take advantage of the local sheltering provided by upwind buildings;
  - all the main entrances are designed as recessed or sheltered by column elements; and,
  - the landscaping includes deciduous trees which are regularly spaced around the site, particularly around pedestrian and cycle routes.
- 15.25 With the above elements in place, conditions within and around the proposed development at ground level (including King's Cross Square) are expected to be safe and within acceptable limits for all intended uses without mitigation.
- 15.26 In this regard, the proposed development is not expected to have an unacceptable impact on amenity in respect of microclimate.

## 16 Planning Obligations and Community Infrastructure Levy

- 16.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 16.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 204 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
  - b) Directly related to the proposed development; and
  - c) Fairly and reasonably related in scale and kind to the proposed development.
- 16.3 Paragraph 54 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 16.4 Under paragraph 55 of the NPPF, planning obligations should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It goes on to state that agreeing conditions is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is clear justification
- 16.5 Under Policy 8.2 of the London Plan 'Planning Obligations', boroughs should include appropriate strategic as well as local needs in their policies for planning obligations. Policy 8.2 states that negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area.

- 16.6 The use of planning obligations is specifically required through Local Plan policy DM1 'delivering and monitoring' although a whole range of individual development policies may be used to justify an obligation.
- 16.7 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.

### **Community Infrastructure Levy (CIL)**

- 16.8 Since 2012, all developments in London which result in the addition of over 100sqm GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG. The relevant MCIL2 rates are as follows:
- Office - £185 per sqm (Central London);
  - Retail - £165 per sqm (Central London); and
  - All other Development - £80 per sqm (Band 1 – Camden).
- 16.9 Camden CIL came into effect on 1 April 2015. The CIL tariff for sites located within Central Camden (i.e. Zone A) are charged at the following rates:
- Office - £45 per sqm;
  - Retail - £25 per sqm
  - Residential (10 or more dwellings) - £150 per sqm; and
  - Other commercial uses - £25 per sqm.
- 16.10 Camden submitted its revisions to the CIL Charging Schedule, on 19 February 2020. The Council held a virtual Examination Hearing on Wednesday 27 May 2020. On 26 June 2020, the Examiners report was published recommending that the Charging Schedule is approved. If the charging schedule is adopted and comes into force prior to grant of the planning permission these will become the relevant charging rates.



16.11 The draft CIL Charging Schedule (2020) within Zone A sets out the following rates:

- Office - £110 per sqm;
- Retail - £32 per sqm;
- Residential (10 or more dwellings) - £193 per sqm; and
- Other commercial uses - £32 per sqm.

### **Developer Contributions**

16.12 The CPG sets out how the Council will use Section 106 Contributions and CIL to fund infrastructure in the Borough. It states that financial contributions will be sought in respect of affordable housing, open space, infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

### **Draft Heads of Terms**

16.13 At this stage it is anticipated that, to the extent that they are not included within a planning condition, the following S106 contributions and obligations involved with this application could include:

- The provision of off-site affordable workspace, with Acorn House being the preferred location
- Agreement and implementation of an Employment and Training Strategy
- Package of end-use employment and training obligations
- Employment and training contribution
- Affordable housing secured off site, with Acorn House being the preferred location
- Affordable housing payment in lieu to make the total affordable housing offer comply with policy when aggregated with the off-site provision
- Obligations to facilitate the provision of open space improvements
- Landscape Management Plan
- Car-free restriction (residential and commercial)
- Construction Management Plan (CMP)
- CMP monitoring fee

- Pedestrian, Cycle and Environment contribution
- Obligations to facilitate Highways improvements
- Strategic Level Travel Plan for office/lab use
- Strategic Level Travel Plan review fee
- Local Level Travel Plan for retail use
- Local Level Travel Plan review fee
- Delivery and Servicing Management Plan
- Agreement and implementation of a Sustainability plan
- Carbon offset contribution
- Agreement and implementation of an Energy plan
- Agreement and implementation of a Basement Construction Plan

## 17 Summary and Conclusions

- 17.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 17.2 The proposed development has been subject to thorough pre-application discussions with local residents, businesses, Camden Officers and other interested third parties. The applicant has sought at all times to consider and where possible incorporate responses received.
- 17.3 The Proposed Development has been designed by AHMM Architects, comprising the demolition and redevelopment of Belgrove House to provide a new part ground plus nine storey and part ground plus 3 storey commercial development with two basement levels for use as an office and research and development headquarter building for the life sciences sector. The building incorporates a publicly accessible ground floor including a café and retail floorspace, an auditorium and events space and a step-free entrance to King's Cross London Underground Line (LUL) in place of the two existing tube boxes on Euston Road.
- 17.4 The applicant has agreed commercial terms with MSD subject to planning permission being granted to occupy the whole building as its new UK Headquarters and Discovery Centre. The proposed scheme brings an extensive package of transformational benefits which follows the Government's ambition to reinforce the UK and London as a global centre for research and technological advances and Camden's ambitions for a successful Knowledge Quarter which directly improves the lives of local communities in which the development sits economically, socially and environmentally.
- 17.5 The existing Belgrove House is a low 1930s brick building with a flat roof and large floor plate currently used as a storage facility. The building is significantly underused, the storage facility hosting only 3FTE jobs in the storage facility. The existing Belgrove House also presents an unsatisfactory frontage to Argyle Square to the south of the site and the adjoining Bloomsbury Conservation Area. It presents blank frontages on all

sides which does nothing for the townscape, streetscape or public realm or the anti-social behaviour which is prevalent in this area.

- 17.6 The proposed development would be to the highest architectural quality and would set a new benchmark for how the new generation of buildings can address the climate change emergency whilst at the same time offering a significant development opportunity to house a knowledge quarter building suitable for occupation by a major life sciences tenant.
- 17.7 The building incorporates a publicly accessible ground floor including a café and retail floorspace, an auditorium and events space and a step-free entrance to King's Cross London Underground Line (LUL) in place of the two existing tube boxes on Euston Road. The applicant is also proposing high quality landscaping on Belgrove Street, Crestfield Street, Euston Road and St Chad's Street which will be secured by legal agreement attached..
- 17.8 A separate planning application is also submitted for 33 new affordable homes at Acorn House, a 4 minute walk away from the site on the corner of Swinton Street and Gray's Inn Road. The proposals for Acorn House also incorporate affordable workspace, and a retail unit. The two permissions will be linked by a legal agreement.
- 1.28 The proposed development will deliver the following benefits:

#### Environmental

- Targeting BREEAM Outstanding with a minimum commitment to BREEAM Excellent
- Target to reduce on-site operational regulated carbon dioxide emissions by 43%
- All electric building with no combustion on site during normal operation
- Innovative double skin façade providing solar control to occupied spaces and enabling the upper office floors to be naturally ventilated
- Biophilic design maximising the amount of natural planting promoting good mental health
- Roof mounted photovoltaics
- Green roof terraces with biodiversity measures

- Rainwater harvesting for irrigation and greywater recycling for toilet flushing
- Detailed embodied carbon assessment to reduce embodied carbon in construction materials
- Diversion of demolition and construction waste for reuse and recycling
- Contributing to substantial improvements to the public realm both along the frontage of Euston Road, and in the context of Argyle Square and the surrounding uses.
- Closure of St Chads Street to vehicles and creation of a new pedestrianised landscaped public space
- Sustainable Urban Drainage
- Removal of LUL boxes and incorporation of an underground entrance providing step free access to King's Cross Station south of the Euston Road
- Participating in the future discussions with regard to the redesign of Argyle Square
- Encouraging sustainable transport options such as cycling and walking to reduce pollution from transport.

## Social

- 33 new affordable homes at Acorn House, Gray's Inn Road (4 mins walk from Belgrove House)
- A tenure split of 60% social rent and 40% intermediate rent
- Dedicated children's playspace
- Community room and terrace for all residents
- New, flexible affordable workspace at Acorn House
- Potential for relocation of the Post Office within Acorn House
- A new café available for use by the general public
- New event space and auditorium available for use by the general public, subject to a detailed management plan
- Publicly accessible ground floor, including potential Knowledge Centre and exhibition space, subject to detailed management plan
- In addition, the potential occupiers of the building, MSD, will run a community outreach programme

## Economic

- Over 1,000 jobs during the construction period first targeted at Camden residents and then via Central London First
  - Approximately £5.8m spent by construction workers in the surrounding area during the construction period which equates to £1.9m annually which will support surrounding local businesses.
  - Work placements and apprenticeships during the construction period
  - Over 800 jobs during operation
  - Apprenticeships made available each year in the completed development within a range of roles including (amongst others) business administration, finance, customer service and IT.
  - Promotion of the Camden STEAM Commission objectives amongst end users and occupiers
  - Requiring living wage as a minimum salary for all local employers
  - Maximising the opportunities for local businesses to supply goods and services at the construction and end user phases.
- 1.29 The proposal demonstrates that it satisfies statute and exceeds planning policies at national, regional and local levels and in addition meets the aims of emerging policy aspirations in respect of the Knowledge Quarter.
- 1.30 The application accords with national, regional and local policy objectives to deliver sustainable, mixed-use and balanced communities and should therefore be approved.

## Appendix A – Letter from MSD

**Roger M. Perlmutter, M.D., Ph.D.**  
President

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30<sup>th</sup> July 2020

Camden Council  
5 Pancras Square  
London, N1C 4AG

Dear Councillors,

**Belgrove House**

I am following up on my letter of 6 February 2020 regarding Belgrove House.

As I believe you now know, we have agreed commercial terms with Precis for Belgrove House to be both our UK headquarters and our Discovery Centre. Clearly this is subject to planning approval by you and the GLA, but the fact we have agreed commercial terms, and that these have been approved by our Board of Directors, should make plain the seriousness of our intent.

I also understand that questions have emerged regarding the scale of our requirement given that we have offices in other parts of the country and London, including at Pancras Square. So, I thought it helpful to set out our position.

Our vision for this HQ and Discovery Centre is to deliver something similar to, but in fact smaller than, our US centres in Boston and San Francisco. For example, our San Francisco site is 290,000 sq ft of research and office space.

We intend to bring together approximately 800 laboratory researchers and office-based staff into this one building. At present, MSD personnel are widely dispersed at Hoddesdon in Hertfordshire (this site moves to short term space in Moorgate from Q1 2021), Pancras Square, the Crick and the LBIC (London BioScience Innovation Centre). Consolidation of these sites to encourage collaboration is a key theme of our development.

This means we require significant lab, office and collaboration space, along with capacity for exhibitions, meetings and engagement. For these reasons, the agreement that we have concluded with Precis includes the whole building.

In addition we wanted to be close to the Knowledge Quarter and especially the Crick, where we may still retain some research space, the Wellcome Centre, the University of London and many other important businesses and academic institutions, as well as the national and international transport links provided by King's Cross/St Pancras International.

Our facilities team is therefore looking to align all our property interests to, we hope, an opening of our new HQ and Discovery Centre at Belgrove House, in the heart of the Knowledge Quarter, by 2024/5, subject to planning permission.

I understand that my colleague, Fiona Marshall, will be meeting with you in the weeks ahead to re-affirm our commitment and to explore ways in which we can bring benefits to residents of Camden. This is something we seek to do with all our developments: we are committed to making a real difference to the community in the years ahead.

Please do not hesitate to contact me directly if you require any additional information.

Yours very truly,

A handwritten signature in black ink, appearing to read "R. Perlmutter", written over a light blue horizontal line.

Roger M. Perlmutter



