

## Sexton, Gavin

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**From:**   
**Sent:** 30 September 2020 11:54  
**To:** Sexton, Gavin  
**Subject:** Objection to the Belgrove and Acorn House Development

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Mr Sexton,

I am writing to object to the proposed development at Belgrove and Acorn House on Euston Road, planning application reference 2020/3881/P.

As a resident of 1 Crestfield Street and on the corner of Argyle Square the proposed development will have significant impact on living in the proposed and affected area, please see below my objection to this proposed development.

### **a)Scale, Bulk and Massing**

London Plan Policies 7.4 and 7.5 require development to respect the local character of the area and deliver a high quality public realm. Architecture is required to make a positive contribution to the public realm and streetscape. London Plan policy 7.6 requires development to deliver a design appropriate to its context and requires buildings to be of a proportion, composition, scale and orientation that enhances the public realm. Similarly, Local Plan Policy D1 seeks to secure high quality design and to ensure that new developments are attractive, safe and easy to use. To achieve this, Camden will require development to respect local context and character.

The existing four storey building at Belgrove House will be demolished and replaced with a part-ten, part-five storey building. The proposed building will therefore result in a significant height increase on the site compared to existing, and also compared to the immediate site context which consists of a six storey building to the west (Megaro Hotel), a four storey terraced building to the east (1-11 Euston Road) and four storey listed Georgian terraced dwellinghouses to the south, west and east. Furthermore, the Council's Draft Site Allocations Local Plan, February 2020, which includes Belgrove House, states that "*Development must respond appropriately to the scale of the adjoining properties and open spaces. The properties in the general vicinity are three to six storeys (except for the former town hall extension, now Standard Hotel) whilst the properties on Belgrove Street and Crestfield Street are lower in scale, being generally four storeys.*" At part-ten and part-five storeys, the proposed building is significantly taller than the three to six storey buildings in the general vicinity of the site referred to in the Draft Site Allocations Local Plan. The streetscene elevation diagrams in the Design and Access Statement confirm that the building will be higher than any buildings in its immediate context along both Euston Road and beyond. As such, we question whether the proposed building appropriately responds to the site context; particularly the more domestically scaled listed Georgian dwellinghouses. As demonstrated in the image below extracted from the Design and Access Statement, the height relationship between the proposed building and the listed Georgian terraced dwellinghouses on Crestfield Street, even where the building steps down in height, is unacceptable in a context such as this where the building will be separated from existing, lower rise dwellings on Crestfield Street by a narrow, secondary street.



*Image showing the existing height relationship between application site (left) and listed Georgian terraces on Crestfield Street (right)*



*Extract from Design & Access Statement*

In terms of massing, the front elevation of the building appears unbroken and monolithic at first and second floor level due to the large areas of glazing compared to surrounding buildings which have more articulated building façades. We understand that the large glazed areas represent a 'picture window' for passers-by to see activity inside the building, however we believe this could still be achieved if more articulation the façade was introduced, which would in turn, would reduce the massing of the building and its overall dominating appearance. As such, we consider the height, scale and massing of the building to be out of context and contrary to London Plan policies 7.4, 7.5 and 7.6, Local Plan policy D1 and the Draft Site Allocations Local Plan.

## **b) Impact on Residential Amenity**

Local Plan policy A1 states that the Council will seek to protect the quality of life and amenity of neighbours. The factors the Council will consider include privacy, outlook, sunlight, daylight, overshadowing, transport impacts, impacts of the construction phase, noise and vibration levels, odour, fumes, dust and microclimate. The proposed building will affect the amenity and conflict with the requirements of policy A1 for the following reasons:

1. Loss of sunlight and daylight – the Sunlight and Daylight Assessment accompanying the planning application assesses the effect of the development on the daylight and sunlight levels of adjacent buildings using the Building Research Establishment's (BRE) guidance 'Site layout planning for daylight and sunlight: A guide to good practice' (2011). The use of this guidance is supported by Camden Local Plan Policy A1. Several residential properties adjacent to the application site will experience noticeable reductions in sunlight and daylight as follows:

- **1 Crestfield Street**
- - 9 out of 11 windows assessed would experience reductions of between 21-28% in Vertical Sky Component (VSC).
- Although the Sunlight and Daylight Assessment describes these breaches to the standards as 'minor' and just beyond the 20% requirement, in our opinion, given the number of windows affected (9 out of 11), the effects will be noticeable. Furthermore, in relation
- to the 'No Sky Line (NSL)' test, 4 out of 11 rooms would also experience a noticeable reduction.
- **47, 47a and 47b Argyle Square**
- – 2 out of 13 rooms would experience a noticeable reduction in NSL levels.
- **7 Argyle Street**
- - 4 of 10 windows would experience a noticeable reduction in VSC levels and 5 of the 7 rooms would experience a noticeable reduction in NSL.
- **11 Argyle Street**
- - 1 of 4 windows would experience a noticeable reduction in VSC levels.
- **Methodist Church and student flats next to Crestfield Street**
- - 11 of 34 windows would experience a noticeable reduction in VSC levels, 6 of the 26 rooms would experience a noticeable reduction to NSL and 2 of the 15 rooms are not BRE sunlight compliant.
- **5 Crestfield Street**
- - all rooms would experience a noticeable reduction in daylight levels and sunlight levels, with significant percentage reductions.
- **2-4 Birkenhead Road**
- - 9 of 27 rooms would experience a noticeable reduction in NSL levels.
- **57-58 Birkenhead Road**

- - 6 out of 18 rooms would experience a noticeable reduction in NSL levels.
- **59 Birkenhead Road**
- - all rooms deviate from VSC targets and 2 of the 3 rooms would experience a reduction to NSL levels.

2. Impact on outlook – rooms on the front elevation of the listed Georgian terraced dwellinghouses on Crestfield Street, which includes habitable rooms such as living rooms and bedrooms, will be detrimentally affected in terms of outlook and sense of enclosure due to the scale, height and massing of the proposed building. As demonstrated in the photograph below, the Georgian dwellinghouses currently enjoy a relatively open aspect and some sky view from habitable rooms facing Crestfield Street. This will change significantly if the proposal is approved, resulting in a material increase in sense of enclosure and harm to outlook from habitable rooms.



*Photograph taken from 1 Crestfield Street*

3. Privacy loss – The proposed building contains roof terraces. The proposed fifth floor terrace providing office amenity space is large and occupies almost 50% of the footprint of the proposed building. There are also additional roof terraces on the fourth floor which wrap around almost the whole fourth floor of the building. These terraces will result in a material increase in overlooking and noise generation from the site compared to the existing building.

### **c) Impact on Heritage Assets**

London Plan Policy 7.8 states that development should identify, value, conserve, restore and reuse and incorporate heritage assets where appropriate. 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.

The application site sits in a sensitive heritage context. There are several listed buildings adjacent to the site and in the immediate context (mostly Grade II listed but also include some Grade I listed buildings: St Pancras Chambers, King's Cross Station and the British Library). The site is also located within the King's Cross Conservation Area and is adjacent to the Bloomsbury Conservation Area. Historic England commented as follows in their pre-application advice response: *"We note, however, 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. In our view, this harm is low. We therefore urge you to work with LB Camden to ensure that the proposals deliver a range of public benefits that would decisively outweigh this harm as required by paragraph 196 of the NPPF"*. The proposed development introduces public benefits such as job creation, sustainability benefits and public realm enhancements. It is therefore important that the Council makes a carefully balanced judgement on whether the benefits are significant enough to outweigh any heritage harm. Areas where the proposal could have offered further public benefits in our opinion include affordable workspace and affordable housing on site as per Local Plan Policy H2.

### **d) Affordable Workspace**

Local Plan policy E2 states that the Council will consider higher intensity redevelopment of sites for business uses provided that the proposed development includes floorspace suitable for start-ups, small and medium-sized enterprises, such as affordable workspace where viable. Draft Policy KQ1 in the Council's Draft Site Allocations Document requires 20% of additional employment floorspace to include affordable workspace in the Knowledge Quarter in which the site is located. However, the applicant states that as Belgrove House is proposed to be a headquarters building for a life sciences tenant comprising laboratory and associated office write-up floorspace, it is not possible to locate the

affordable workspace on site. The applicant therefore proposes an element of affordable workspace off-site at nearby Acorn House. The applicant states that the amount of affordable workspace provided at Acorn House (427 sqm) is limited by the overall redevelopment of Acorn House being constrained due to the proximity of listed buildings and also due to maximising the amount of affordable housing achievable on site at Acorn House. It is important that the Council determines whether the proposed amount of affordable workspace at Acorn House (476 sqm) is the maximum viable, in accordance with policies E2 and KQ1. We note that the applicant does not refer to a viability appraisal to justify the level proposed.

#### **e) Affordable Housing**

Local Plan policy H2 states that where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. Furthermore, where housing is required as part of a mix of uses, policy H2 requires self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. However, the proposal does not include any housing on site. Policy H2 states where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, the Council will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu. The proposal proposes off-site affordable housing (33 units) at Acorn House (a separate planning application has been submitted for this). The applicant also proposes an affordable housing payment in lieu to make the total affordable housing offer comply with policy when aggregated with the off-site provision. We note that policy H2 only allows payment-in-lieu in exceptional circumstances. The Council needs to closely vet the application to determine that housing on site is not practical and would be more appropriately provided off-site, and also be satisfied that exceptional circumstances exist which allow an affordable housing payment-in-lieu. We note that the applicant does not refer to a viability appraisal to justify the level proposed

Please confirm receipt of this email and please do feel free to contact me should you have any questions or concerns.

Yours sincerely

Ophelia Smith