



GERALDEVE

## **Town Planning Statement**

The Former Royal National, Throat, Nose and Ear Hospital  
330 Gray's Inn Road

On behalf of: 330 Gray's Inn Road Limited

Date: 30 November 2020



**GERALDEVE**

## **Town Planning Statement**

The Former Royal National, Throat, Nose and Ear Hospital  
330 Gray's Inn Road,

On behalf of: 330 Grays Inn Road Limited

Date: 30 November 2020

LJW/ANE/SOHA/U0009551

© copyright reserved 2020

Gerald Eve LLP

<b>Contents</b>	Page	<b>Appendices</b>
-----------------	------	-------------------

---

1 Executive Summary	3	A
2 Introduction	9	
3 Site and Surroundings	15	
4 Planning History	20	
5 Proposed Development	22	
6 Consultation and Community Engagement	34	
7 Planning Policy Context	42	
8 Land Use	48	
9 Design, Bulk and Massing	62	
10 Heritage, Townscape and Views	73	
11 Landscape and Public Realm	80	
12 Energy and Sustainability	85	
13 Amenity	90	
14 Transport, Waste and Servicing	95	
15 Other Technical Considerations	102	
16 Planning Obligations and Community Infrastructure Levy	113	
17 Summary and Conclusions	116	

## 1 Executive Summary

- 1.1 This Town Planning Statement is submitted on behalf of 330 Gray's Inn Road Limited (the "Applicant") in support of an application for full planning permission for the redevelopment of 330 Gray's Inn Road (the "Site").
- 1.2 This large strategic site was formerly occupied by The Royal National Throat, Nose and Ear Hospital (RNTNEH).
- 1.3 At 0.6 hectares of land in single ownership, the Site is arguably the most significant redevelopment site at the northern end of Gray's Inn Road and it has the potential to be a catalyst for regeneration; helping to bring the benefits of the incredible changes to King's Cross south and east into this part of the borough.
- 1.4 The Site lies in the heart of the Knowledge Quarter (KQ), which is one of the densest concentrations 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 proposals would support the KQ as a cluster of innovation.
- 1.5 The redevelopment proposals present a significant opportunity to extend this transformation to the south and east of the stations and to substantially improve the environment both physically and socially for those already living and working in the vicinity.
- 1.6 This Planning Statement is submitted in support of a detailed planning application for the redevelopment of the Site, to provide a mixed use development comprising a new office building, a 182 bed hotel, 76 new homes with a shared private residential garden, a gymnasium, a café/restaurant space, creation of 2 new pedestrian routes and a publicly accessible open space.
- 1.7 The proposed scheme has been designed by Stirling Award winning architects, Allford Hall Monaghan Morris (AHMM) who have extensive experience of working in Camden. The public realm and residential garden have been designed by East.

- 1.8 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, they have been developed with regard to London Borough (LB) of Camden’s future aspirations for development in this location, as set out in the draft policy wording.
- 1.9 The Site is allocated (Policy IDS15 – 330 Gray’s Inn Road) within the Draft Site Allocations Camden Local Plan (2020) for **“a mixed-used development to include offices and other uses related to the knowledge and innovation economy, and permanent self-contained homes.”**
- 1.10 The Proposed Development presents an opportunity to replace the existing buildings which are poor quality and piecemeal. Aside from the original building at 330 Gray’s Inn Road which is being retained, the existing buildings interact poorly with the streetscape with no permeability from Gray’s Inn Road to Wicklow Street or Swinton Street.
- 1.11 The Proposed Development would provide highly sustainable new buildings with a mix of uses including a hotel, new homes, high-quality workspace, a new gym and café/restaurant uses at ground floor and a publicly accessible open space.
- 1.12 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.
- 1.13 The proposals align with Camden’s aspirations for Central London which is an identified area of growth at a local and regional level. In particular the development aids in working towards the Council’s vision for the Borough by 2025 by:-

- Delivering a truly mixed-use development in a central, well connected location providing homes and jobs;
- Building genuinely affordable homes in a purpose built block;
- Facilitating growth which is inclusive for local people;
- Creating a night-time economy, balancing the needs of visitors and businesses with those of local people;
- Helping to reduce carbon emissions in the borough by delivering a highly sustainable set of buildings which are flexible in their design to stand the test of time; and
- Creating a new publicly accessible space and improving the pedestrian experience through the creation of new routes through the site.

1.14 The key public benefits of the proposed development have been split in accordance with the following categories:

1. Health and the Well Being of the Environment (Environmental)
2. Strength of the Community (Social)
3. Jobs and Economic Growth (Economic)

1.15 Environmental benefits

- Targeting BREEAM Outstanding with a minimum commitment to BREEAM Excellent
- WELL and LEED accreditations
- Target to reduce on-site carbon emissions by at least 35%
- Mechanical ventilation to office with potential for mixed mode
- Natural planting incorporated into architecture 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
- New pedestrian connections through to a new public realm on Wicklow Street from both Swinton Street and Gray's Inn Road;
- Creation of a new landscaped public space fully accessible to the general public

- Creation of a new landscaped private garden accessible to all residents of the new development
- 18 new trees
- Sustainable Urban Drainage
- The potential to engage with wildlife trusts and appropriate amenity societies to support their goals and initiatives
- Encourage sustainable transport options such as cycling and walking to reduce pollution from transport.
- Retention and refurbishment of historic building (330 Gray's Inn Road).

#### 1.16 Social Benefits

- Redevelopment of a large vacant site in single ownership in the heart of the Knowledge Quarter
- Creation of a new mixed-use destination which would act as a catalyst to the wider regeneration of the area
- 76 new private and affordable homes
- 50% affordable housing (on habitable rooms)
- 32 new affordable homes
- 190 sqm of dedicated children's playspace
- 748 sqm of new, flexible affordable workspace
- New 182 bed hotel to support the growing Knowledge Quarter and add to character and activity of this location
- New café spaces and a restaurant for use by the general public within the new hotel and office buildings
- Active publicly accessible and engaging ground floor facilities within the hotel and office buildings
- New active frontages generating increased natural surveillance and contributing to a reduction in anti-social behaviour.

#### 1.17 Economic Benefits

- An average of 670 construction jobs per annum during the construction period first targeted at Camden residents and then via Central London First

- Approximately £2-£3.3m spent by construction workers in the surrounding area during the construction period which equates to £570k to £940k annually which would support surrounding local businesses
- Work placements and apprenticeships during the construction period.
- Over 1,230 gross direct on-site 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
- Work placements and apprenticeships made available in the hotel in connection with Westminster Kingsway College school of hospitality and culinary arts
- Promotion of the Camden STEAM Commission objectives amongst end users and occupiers
- Require living wage as a minimum salary for all local employee's
- Maximise the opportunities for local businesses to supply goods and services at the construction and end user phases
- Potential to contribute towards the ongoing success and development of the Knowledge Quarter through provision of lab-enabled space.

1.18 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, layout, public realm and height, bulk and mass has been forensically considered.

1.19 A comprehensive townscape analysis, undertaken by Peter Stewart Consultancy, has informed the massing and design of the proposed development to ensure that it relates to its surroundings and respects the nearby heritage assets whilst creating a series of new high quality buildings in this prominent central London location.

1.20 Within this context, the Site presents a major opportunity for development, being a now vacant site, located in a strategic location within the borough of Camden.

1.21 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.





- 1.22 Community engagement has taken place since January 2020 and is ongoing. The Applicant is committed to continuing their engagement with local residents and businesses during the determination period and in the future.
- 1.23 This Town Planning Statement provides an assessment of the Proposed Development in planning terms in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which requires planning applications to be determined in accordance with the Development Plan unless material considerations otherwise.
- 1.24 As demonstrated within this Planning Statement, it is considered that the Proposed Development fully complies with the development plan and meets the objectives and aspirations for Camden and the Applicant. On this basis, we consider that planning permission should be granted.

## 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 including 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 therefore referable to the GLA.
- 2.2 This Statement sets out the planning case in support of the application. It summarises the planning history of the Site and assesses the Proposed Development in the context of relevant policies and guidance.
- 2.3 The Site was formerly occupied by The Royal National Throat, Nose and Ear Hospital (RNTNEH). In October 2019 University College London Hospitals opened a new hospital in Huntley Street, London, WC1E 6DG to house the Royal National Throat, Nose and Ear Hospital and the Eastman Dental Hospital and many departments moved there. The remaining facilities including wards, operating theatre, sleep unit, and the UCL Ear Institute & Action on Hearing Loss Library that remained at Gray's Inn Road relocated to Huntley Street over the course of 2020.
- 2.4 Planning permission is sought for the following ("the Proposed Development"):

**“Redevelopment of the former Royal National Throat, Nose and Ear hospital, comprising: Retention of 330 Gray’s Inn Road and a two storey extension for use as hotel, demolition of all other buildings, the erection of a part 13 part 9 storey building plus upper and lower ground floors for use as a hotel including a café and restaurant; covered courtyard; external terraces; erection of a 7 storey building plus upper and lower ground floors for use as office together with terraces; erection of a 10 storey building plus upper and lower ground floors for use as residential on Wicklow Street and office space at lower ground and basement floors; erection of a 5 storey building plus upper and lower ground floors for use as residential on Swinton Street and associated residential amenity space; together with a gymnasium; new basement; rooftop and basement plant; servicing; cycle storage and facilities; refuse storage; landscaping and other ancillary and associated works.”**

2.5 The Proposed Development is described in greater detail in Section 6.0 of this Statement but, in summary, consists of:

- 182 bedroom hotel
- 13,275sqm of Office floorspace,
- 748sqm of affordable workspace
- 76 new homes (including 50% affordable provision on a habitable room basis)
- A new gymnasium
- Restaurant/café uses
- A new public courtyard

2.6 The package of public benefits deliverable with this application is substantial. 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

2.7 The proposed scheme provides an opportunity to deliver a number of key planning objectives both locally and regionally, namely:

- Mixed use development that maximises the development potential of this Central London site;
- Deliver an innovative, modern and flexible office space to attract new jobs and support small and medium sized businesses;
- Provide a mix of new homes including affordable homes, ranging in size and tenure, delivering a significant proportion of homes south of Euston Road;
- Potential to contribute towards the ongoing success and development of the Knowledge Quarter through provision of lab-enabled space;
- Improve permeability through the site, providing a direct pedestrian link between Wicklow Street, Swinton Street and Gray’s Inn Road;

- A hotel and connected leisure uses, to activate the site and serve the area; and
- Significantly enhanced public realm and a new public courtyard.

2.8 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.

2.9 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, Waste and Servicing;
- Section 15 – Other Technical Considerations;
- Section 16 – Planning Obligations; and
- Section 17 – Summary and Conclusions.

2.10 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;
- Design and Access Statement, prepared by AHMM;

- Townscape, Heritage and Visual Impact Assessment, prepared by Peter Stewart Consultancy;
- Flood Risk Assessment, prepared by WSP
- Health Impact Assessment, prepared by XCO2
- Structural Report including Basement Impact Assessment, prepared by WSP
- Fire Statement, prepared by OFR;
- Sustainability Statement, prepared by XCO2;
- Energy Statement, prepared by XCO2;
- Circular Economy Statement, prepared by XCO2;
- Whole Lifecycle Assessment, prepared by XCO2;
- Transport Assessment, prepared by Steer Group;
- Draft Travel Plan, prepared by Steer Group
- Draft Construction Management Plan, prepared by Steer Group;
- Draft Servicing Management Plan, prepared by Steer Group;
- Waste Storage and Collection Plan, prepared by Steer Group;
- Noise and Vibration Assessment, including Acoustic Report, prepared by Hann Tucker
- Air Quality Assessment, prepared by AQ Consultants;
- Biodiversity Survey and Report, prepared by DF Clark Bionomique;
- Tree Survey / Arboricultural Statement, prepared by DF Clark Bionomique;
- Archaeological Assessment, prepared by Pre-Construct;
- Daylight and Sunlight Assessment, prepared by Point2;
- Statement of Community Involvement, prepared by London Communications Agency;
- Regeneration Statement/Economic Impact Assessment, prepared by Hatch Regeneris;
- Contaminated Land Assessment, prepared by WSP;
- Drainage Report including SuDs Strategy, prepared by WSP.

2.11 Detailed pre-application consultations were held with the London Borough of Camden from June 2019 up to the submission of this application in November 2020. Pre-application meetings have also been held with the GLA, Historic England and TfL. Detailed pre-application discussions have also been held with local stakeholders, local residents, Ward

Councillors and community groups. This is detailed further in Section 6 of this statement and in the accompanying Statement of Community Involvement.

- 2.12 The application proposals have evolved over the pre-application and consultation period and have been revised to accommodate advice and comments received.
- 2.13 This Planning Statement provides a comprehensive review of relevant national, regional and local planning policy in relation to the proposed development. 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.
- 2.14 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.
- 2.15 The Examination in Public (EiP) on the New London Plan was held between 15 January and 22 May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.
- 2.16 In March 2020 the Secretary of State for Housing, Communities and Local Government directed the Mayor to make specified changes to the Intend to Publish London Plan (IPLP). The Mayor cannot publish the plan until he has incorporated these changes, or the Secretary of State has withdrawn the direction following further negotiation. The regional component of the development plan therefore remains the London Plan (consolidated with alterations from 2016). However, the Mayor is giving significant weight to the IPLP and the Camden is also giving weight to certain policies not subject to challenge by the Secretary of State - such as the emerging cycle parking standards and energy.
- 2.17 Policies subject to challenge by the secretary of state, should be given limited weight. In this regard, none of the draft policies being challenged would affect the planning policy assessment of the proposed development.

- 2.18 The Local Development Framework ('LDF') which consists of the Camden Local Plan and was adopted on the 3 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.
- 2.19 The Council is updating its Site Allocations Local Plan (SALP). The emerging SALP builds on the Council's existing adopted policies and sets out how key development areas and sites should be developed in the future.
- 2.20 Production of the document was paused during the summer to consider the implications of the proposed Government reforms to the planning system set out in the Planning for the Future White Paper and the changes to the Use Class Order. LBC are now restarting work with the intention of consulting on a pre-submission draft during 2021 (rather than first consulting on additional focused changes of the SALP as originally planned).
- 2.21 Whilst the draft site allocations document holds limited weight in the assessment of the proposals, they have been developed with regard for London Borough (LB) Camden's future aspirations for development in this location, as set out in the draft policy wording.
- 2.22 Guidance within the National Planning Policy Framework (February 2019) is also a material consideration against which the proposals have been considered.

### 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.

#### The Site

- 3.2 The 0.6 ha application site is located at 330 Gray's Inn Road in the London Borough of Camden ('LB Camden') within the ward of King's Cross. The full extent of the application site is shown within the red line boundary on the Site Plan (Ref) enclosed at Appendix A.
- 3.3 The Site is bound to the north in part by the UCL Ear Institute and in part by Wicklow Street and railway cuttings to the east; Swinton Street to the south and Gray's Inn Road runs along the Site's western boundary.
- 3.4 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.**'
- 3.5 The Site is located within the Knowledge Quarter, 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.
- 3.6 The Site is over-sailed by the London View Management Framework (LVMF) London Panorama 2A.1 from the summit of Parliament Hill towards St Paul's Cathedral and the LVMF 3A.1 from Kenwood Gazebo towards St Paul's Cathedral.



- 3.7 The Site was formerly occupied by a number of buildings which made up the Royal National Throat, Nose and Ear (RNTNE) Hospital. The hospital comprised a number of departments occupying buildings of different scales and ages.
- 3.8 The hospital closed in September 2020 when the final services transferred to the new Royal National ENT and Eastman Dental Hospitals on Huntley Street, London, WC1E 6DG.
- 3.9 There are seven existing buildings located on Site:
- a The Royal National Throat, Nose and Ear Hospital, Gray's Inn Road
  - b The Royal National Throat, Nose and Ear Hospital, Wicklow Street
  - c Building to the rear of the Original Hospital Building, Wicklow Street
  - d Nurses' Home, Wicklow Street
  - e Workshops to the rear of Nurses' Home, Wicklow Street
  - f Nuffield Hearing and Speech Centre, Swinton Street
  - g Audiology Centre, Swinton Street.
- 3.10 The hospital's original main frontage, 330 Gray's Inn Road, visible at first and second floor levels, with the hospital's original name spelt out below the parapet, was built in 1877, when the hospital relocated from Argyle Street. Through the 19<sup>th</sup> Century, this building was extended, and more wards built. The Site has developed in an organic way and has a distinctive grain and informality. Further detail on the history of the Site can be found in section 4 of this Planning Statement.
- 3.11 The Site does not contain any statutory listed buildings or locally listed buildings.
- 3.12 The Site sits within the King's Cross St Pancras Conservation Area (Sub Area 4) with the boundary to the Bloomsbury Conservation Area running along Swinton Street, to the south. The conservation area has a mixed townscape character.
- 3.13 The King's Cross Conservation Area Statement (2003) identifies 330 Gray's Inn Road, the Nurses' Home and the ground floor of the buildings at the rear to the Royal National Throat Nose and Ear Hospital (Wicklow Street) as 'positive contributors' to the conservation area.

3.14 The Site has an overall fragmented townscape character and its principal contribution to the conservation area is the street frontage to Gray's Inn Road, forming part of a group of buildings that are varied in age, use, architectural style and height.

### **Surrounding Context**

3.15 The Site is immediately adjoined by Swinton House and the Water Rats public house to the south on Gray's Inn Road. Beyond this, situated on the corner of Gray's Inn Road and Swinton Street is the seven-storey Point A Hotel (Swinton House). To the north is the UCL Centre for Auditory Research and 334-336 Gray's Inn Road.

3.16 There are a number of listed buildings located on streets that define the Site edges, in the surrounding area of the Site (all listed grade II):

- A selection of mid-19<sup>th</sup> century terraced houses on Swinton Street:
  - Nos.5-17 (Odd) and attached railings;
  - Nos.29, 31 and 33 and attached railings;
  - Nos.35-49 (Odd) and attached railings;
  - Nos.51 and 53 and attached railings; and
  - Nos. 55-67 (Odd) and attached railings including the former King's Head Public House (Nos. 61-63).
  - Nos.4-26 (Even) and attached railings.
  - Swinton Hotel (nos.22 and 24).
- Derby Lodge on Wicklow Street (east of the railway cutting), a development of flatted, philanthropic housing, c1865, by Sydney Waterlow's Improved Industrial Dwellings Company;
- Former Church School of St Jude's Church, No. 75 Wicklow Street.

3.17 King's Cross Station (Grade I) is located to the north of the Site.

- 3.18 Within the immediate vicinity the prevailing development is characterised by a mix of commercial, residential and hotel uses.
- 3.19 Swinton Street is occupied by offices, a hotel, institutional buildings and 19<sup>th</sup> Century terraced residential properties.
- 3.20 Wicklow Street is a quiet, narrow cobbled street, which provides the only north-south link within the area. There is a variety of architectural styles emphasising different uses, with light industrial buildings now redeveloped for modern day purposes constructed of stock brick. Terraced residential houses are located to the east of the road. A large student housing block is located on the northern side of the street, on a parcel of land between Wicklow and Britannia Street.

### **Accessibility and Connectivity**

- 3.21 The Site has a Public Transport Accessibility Level (PTAL) of 6b, the highest level achievable. This is a result of a high quality, frequent and reliable provision of underground, national rail service and buses in the area.
- 3.22 The closest London Underground station is King's Cross, located 256m to the north-west with National rail services accessed some 50m further north from King's Cross railway station. St Pancras national/international railway station is located just to the west of King's Cross.
- 3.23 King's Cross/St Pancras Railway Station is a major rail hub and operates a high frequency of rail services and routes to destinations within London and across the UK. Eurostar services operate from St Pancras connecting to destinations in France, Holland and Belgium.
- 3.24 Access from the Site to King's Cross and St Pancras stations is currently via Gray's Inn Road.
- 3.25 Five bus routes run along Gray's Inn Road which features a north-bound bus lane and stop opposite the Site. The nearest southbound bus stop is 300m to the south-east

on Kings Cross Road. There is a bus stand on Swinton Street across the road from the Site.

- 3.26 The Site is part of the City Road / Pentonville Road / Euston Road loop, with the southern and western edges of the Site bounded by the westerly vehicular route.
- 3.27 Vehicular access to the existing hospital is via Wicklow Street, a 20mph single carriageway road, which is one way in a westbound direction, bending towards Britannia Street to the north. To the south of the Site is Swinton Street which is a 30mph one-way road running westbound towards Gray's Inn Road with two lanes.
- 3.28 There is currently no pedestrian route through the Site between Wicklow Street and Swinton Street.

## 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, in July 2013 planning permission (ref. 2013/4285/P) was granted for the **installation of louvred screen enclosure and metal sheet cladding at fifth floor and roof level of main hospital block and installation of wrapping fabric to chimney.**
- 4.3 In July 2008, a planning application (ref. 2008/3231/P) was submitted for the **erection of a new 5 storey plus basement hospital building containing operating theatre suites, patient wards, entrance admissions and pre-surgical areas and staff changing facilities.** A supporting Conservation Area Consent application (2008/3243/C) was submitted for the **demolition of existing outbuildings in service yard.** Both applications were withdrawn by the applicant.
- 4.4 In September 2008, planning permission (ref. 2008/1023/P) was granted for **alterations to enclose lower level of carpark (ancillary to the hospital use Class C2) to provide engineers workshops as ancillary to hospital use.**
- 4.5 Conservation Area Consent (ref. 2004/1140/C) was given for the **erection of new hospital treatment centre on four floors, involving the demolition of existing freestanding buildings, stores and workshops, and including the installation of rooftop plant** in May 2005.
- 4.6 In September 2005, planning permission (ref. 2004/1138/P) was granted for the **erection of new hospital treatment centre on four floors, involving the demolition of existing freestanding buildings, stores and workshops, and including the installation of rooftop plant.**
- 4.7 In April 2004, planning permission (ref. 2004/0846/P) was granted for **the erection of a new link block, enlargement of the existing lift and the provision of fire escape.**

- 4.8 In February 2002, planning permission (PSX0105073) was granted for the **erection of 4 story building with plant room comprising 2334m<sup>2</sup> for use as a centre for auditory research (class D1) following the complete demolition of existing hospital canteen and ancillary buildings.** Conservation Area Consent (ref. CSX0105074) was granted for the **complete demolition of existing hospital canteen and ancillary buildings.**
- 4.9 As demonstrated through the above applications, the hospital, which started on another site, has grown haphazardly and expediently over the years. The result is an ad hoc assemblage of structures of different ages, scales, external materials and architectural expressions.
- 4.10 This application provides the opportunity to deliver the redevelopment of a strategic site which would facilitate regeneration of the local area and the Knowledge Quarter.

## 5 Proposed Development

- 5.1 The key details of the Proposed Development are summarised in this section. Further detail of the individual elements is provided within sections 8 – 15.
- 5.2 The Proposed Development seeks to create an exemplary mixed-use development through the provision of high-quality architecture, public realm and landscaping, which encourage activity and permeability through the Site. The proposal also delivers a highly sustainable approach, in both the retention and re-use of the existing building as far as possible, and the energy and sustainability strategy for the future, operational building.
- 5.3 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.
- 5.4 Full planning permission is sought for:

**‘Redevelopment of the former Royal National Throat, Nose and Ear hospital, comprising: Retention of 330 Gray’s Inn Road and a two storey extension for use as hotel, demolition of all other buildings, the erection of a part 13 part 9 storey building plus upper and lower ground floors for use as a hotel including a café and restaurant; covered courtyard; external terraces; erection of a 7 storey building plus upper and lower ground floors for use as office together with terraces; erection of a 10 storey building plus upper and lower ground floors for use as residential on Wicklow Street and office space at lower ground and basement floors; erection of a 5 storey building plus upper and lower ground floors for use as residential on Swinton Street and associated residential amenity space; together with a gymnasium; new basement; rooftop and basement plant; servicing; cycle storage and facilities; refuse storage; landscaping and other ancillary and associated works.’**

### Land Use

- 5.5 The proposed development would provide 33,113sqm (GIA) of floorspace, an uplift of 20,302sqm (GIA) over the existing as shown in Table 1.

5.6 The Proposed Development is mixed use and proposes 13,275 sqm GIA of high specification office floorspace (Class E), 748sqm of affordable workspace (Class E), 9,427sqm of hotel floorspace (Class C1), 76 new homes (Class C3), a gym (Class F2) and ancillary café/restaurant uses.

5.7 Table 1 summarises the floor areas of the existing building and the proposed development on the basis of gross internal area.

**Table 1: Existing and Proposed Floorspace by Land Use (GIA)**

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net change in GIA (sqm)
Hospital	12,811	0	
Hotel	0	9,427	+9,427
Office/Labs	0	14,023	+14,023
Residential	0	8,187	+8,187
Gym	0	1,476	+1,476
<b>Total</b>		33,113	+20,302

**Creation of a double basement**

5.8 The existing basement level would be deepened to accommodate a two-storey basement below the office and hotel building footprints and a single basement below the residential buildings. At its deepest, the basement would extend to a depth of about 14m below street level.

5.9 This basement space would provide plant space cycle storage and back of house facilities for all uses. A shared loading bay within the office building provides all servicing for the commercial elements.



- 5.10 A Basement Impact Assessment, prepared by WSP has been submitted to outline how the surrounding buildings and below ground infrastructure would be safeguarded.

### **Provision of Office Floorspace**

- 5.11 The proposals seek to provide 14,023sqm of office floorspace across lower ground, ground and six upper storeys (+52.8m AOD).
- 5.12 748sqm of the office space would be provided as affordable workspace, allocated for SMEs. This would be located within the basement of the Wicklow Street residential building.
- 5.13 Given the site's location within the KQ, two floors (Upper ground and Level 01) have been designed to provide lab enabled space to accommodate the needs of a life science company. The provision equates to roughly 21% of the overall floorspace of the proposed office.
- 5.14 In order to meet the requirements for lab enabled space, these floors have taller floor to ceiling heights (4-4.5m). The building has been designed to accommodate additional riser space within the building structure dependent on future tenant requirements.
- 5.15 There are external terraces proposed for use by tenants of the building accessible from the second to seventh floors. The building has been designed flexibly to enable it to be let to multiple occupiers. The total amenity space provided amounts to 400 sqm.
- 5.16 At ground level (Wicklow Street), a large, double height office reception would provide a large lobby area and a café space. The ground floor of the office has been designed as a location for office tenants and the general public. To ensure integration of the office into the scheme, and local area, a publicly accessible cafe and events space has been located near the entrance, designed to spill out into the courtyard, and to be used by both building tenants and local residents.
- 5.17 The shared office reception/café space would be accessible to all members of the public to maximise activity.

- 5.18 The primary access into the office reception is through two doors which front the new Wicklow Courtyard. A secondary access point is located on Wicklow Street, which would provide secure 24 hour access for tenants.
- 5.19 Two additional doors are located on Wicklow Courtyard, providing access to the café space and to the core. These also operate as fire exits.
- 5.20 The office accommodation on the Swinton Street ground floor, provides the flexibility to be either one demise, or split into two smaller spaces for start-ups and incubators. The floorplates have been designed to enable the spaces to be used by different tenants. The floorplate to the southwest can be accessed either from the central core, or directly from Swinton Street.
- 5.21 The large open plan floorplate is organised around a central core, providing floors which are easily divided into one, two, three, or four-way splits. While generous floor to floor heights allow for large windows to allow deep penetration of daylight & minimise use of artificial lighting. The office accommodation on the typical floors is designed to be flexible and adaptable to meet a range of requirements for a variety of tenants, ensuring maximum efficiency.
- 5.22 The cycle store entrance into the office building is located on Wicklow Street, providing direct access to the secure bicycle store at basement level, and male and female end of journey facilities at sub-basement level.
- 5.23 There are external terraces proposed for use by tenants of the building accessible from the second to seventh floors. The building has been designed flexibly to enable it to be let to multiple occupiers. The total amenity space provided amounts to 400 sqm.
- 5.24 A service yard would be provided at ground floor level (Swinton Street) and accessed via a crossover from Swinton Street. This service yard would be shared between all commercial uses, providing flexibility and control over the timing of deliveries, frequency of commercial waste collections and types of vehicle used.

## **Provision of a new 182 bed hotel**

### *Gray's Inn Road*

- 5.25 A new, high quality hotel would front onto Gray's Inn Road. The existing 330 Gray's Inn Road building would be retained and extended by one and a half storeys to provide flexible public event and dining space.
- 5.26 At lower ground level, a back of house kitchen would be provided, utilising the existing basement of 330 Gray's Inn Road. The kitchen would connect to other back of house facilities, the secondary hotel lobby off Wicklow Street, and the hotel restaurant. Given the level change between Gray's Inn Road and Wicklow Street, the restaurant and lobby have level access onto the new public courtyard on Wicklow Street.
- 5.27 At upper ground level, behind the retained building on Gray's Inn Road, a café and reception entrance to the hotel would be introduced. Behind this, a courtyard space would connect the old building to the new, principal hotel lobby.
- 5.28 The cafe and entrance space would create an active internal environment and draw users into the building to the covered courtyard space which would connect the old building to the hotel lobby entrance, and beyond this, the modern hotel space.
- 5.29 The first and second floors of the retained building would provide event space for the hotel. A dining space, with a function room would be located within the retained building on the third and fourth floor.
- 5.30 A new route from Gray's Inn Road to Wicklow Street would connect the existing building to the new hotel. The route through the public ground floor is open to the sky along part of its length. This route creates a new a connection through to Wicklow Street away from the busy Gray's Inn Road.

### *Wicklow Street*

- 5.31 The hotel can also be accessed from the new public courtyard. A hotel lobby/ bar fronts the new courtyard providing an arrival point for those arriving from Wicklow Street.
- 5.32 The restaurant space at lower ground level (as stated in 5.23) carries up to upper ground level providing a terrace overlooking the new Wicklow Courtyard. The upper floor of the

restaurant space has an entrance off the walkway connecting Gray's Inn Road to Wicklow Street.

- 5.33 The new hotel would comprise two new buildings, one with a height of 13 storeys plus ground and the second with a height of eight storeys plus ground.
- 5.34 A central core connects all floors to the lobby spaces at both ground floors. A central corridor allows for the massing to step in as the volume is articulated.
- 5.35 A total of 182 hotel rooms would be provided within the new build element. The room sizes range from small (16sqm), medium (17-18sqm) and large (20sqm). 9 hotel rooms are designed as accessible, and a further 9 are adaptable.
- 5.36 A breakdown of the room provision on a floor by floor basis is set out in table 2 below:

**Table 2: Provision of Hotel Rooms**

Floor	Small Room <16sqm	Medium Room c. 17-18sqm	Large Room >20sqm	Rooms per floor
First to Fourth	5	13	4	22
Fifth and Sixth	7	8	4	19
Seventh	7	6	3	16
Eighth	6	6	3	15
Ninth to Thirteenth	0	3	2	5
<b>Total</b>	<b>47</b>	<b>95</b>	<b>40</b>	<b>182</b>

- 5.37 A publicly accessible external roof terrace (130sqm) would be located on the tenth floor, providing external amenity space to the hotel guests.

### **Provision of 76 new homes**

- 5.38 A total of 76 new homes would be delivered across two residential buildings.
- 5.39 Block A, fronting Swinton Street would provide 32 new affordable homes, Block B, fronting Wicklow Street would provide 44 new market homes. The overall proposed mix (table 3)

would ensure a range of new homes are provided from studio flats to 3 bed family homes, with an affordable housing provision of 50% (based on habitable rooms).

**Table 3: Total Housing Provision**

Unit Size	No. of units	Percentage
Studio	17	22%
1 bed	27	36%
2 bed	24	32%
3 bed	8	10%
Total	76	

5.40 In terms of residential quality, the new housing proposed would meet and exceed the Intend to Publish London Plan space standards, feature private outdoor amenity space with each flat having their own balcony and access to a shared, private residential garden.

#### *Swinton Street*

5.41 32 new, affordable homes would be provided within the residential building on Swinton Street, providing a range of unit sizes from 1 bed to 3 bed apartments. All of the homes would be dual aspect and accessed from a central lift and stair core. Deck access is provided for each new home.

5.42 The Duplex units at lower ground level have direct access out onto the garden with all other residents able to access the garden via the main core.

5.43 Residential bin stores are located at the ground floor and are directly accessed from Swinton Street.

5.44 The proposed mix for the Swinton Street residential building is set out in table 4.

**Table 4: Schedule of Accommodation (Swinton Street)**

Floor	Studio	1 Bed	2 Bed	3 bed
Lower ground and ground floor duplex	0	0	1	6
First	0	5	1	0
Second	0	5	1	0
Third	0	5	1	0
Fourth	0	1	3	0
Fifth	0	2	1	0
Total	0	18	8	6
	0%	56%	25%	19%

*Wicklow Street*

- 5.45 44 new, market homes would be provided within the residential building on Wicklow Street, providing a range of unit sizes from studios to 3 bed apartments.
- 5.46 The building is accessed from a central lift and stair core at lower ground level. Residential bin stores and cycle parking are also located at the lower ground floor and are accessed from the core, and Wicklow Street.
- 5.47 The proposed mix for the Wicklow Street residential building is set out in table 5.

**Table 5: Schedule of Accommodation (Wicklow Street)**

Units per Floor	Studio	1 Bed	2 Bed	3 bed
Ground	3	0	2	6
First	2	1	2	0
Second to Fifth	3	1	1	0
Sixth to Ninth	0	1	2	0
Tenth	0	0	0	2
<b>Total</b>	17	9	16	2
	39%	20%	36%	5%

**Provision of Ancillary Retail and Restaurant/Café spaces**

- 5.48 The Proposed Development would deliver a café space at the front of the hotel building, fronting Gray's Inn Road, and a restaurant space at the back of the hotel, onto the public courtyard.
- 5.49 These spaces are intended to be run by the hotel operator but remain flexible for a separate owner to occupy. The creation of new food and beverage spaces would ensure active frontages are created onto Gray's Inn Road and the new Wicklow Courtyard creating activity in and around the site.
- 5.50 The ground floor of the office has been designed as a location for office tenants and the general public. To ensure integration of the office into the scheme, and local area, a publicly accessible cafe and events space has been located near the entrance, designed to spill out into the courtyard, and to be used by both building tenants and local residents.
- 5.51 The shared office reception/café space would be accessible to all members of the public to maximise activity.

### **Provision of a new Gymnasium**

5.52 The proposed gym would be located at basement level, with access off Swinton Street and the new Wicklow Courtyard. The primary gym entrance is located within the passage connecting the new courtyard with Swinton Street.

### **Landscaping and Public Realm**

5.53 The public realm strategy proposes two key areas:

- Wicklow Courtyard, a new publicly accessible courtyard, and;
- The Railway Garden, shared private residential gardens for the residents within Block A and Block B.

5.54 In addition to this, external landscaping would be located on terraces of the office building, and of the hotel.

#### Wicklow Courtyard

5.55 Oriented north, it is to be made of re-used materials, taking bricks from the existing buildings.

5.56 The main entrance into the space would be from Wicklow Street, it is also accessed by two passageways, one from Swinton Street, and another from Gray's Inn Road, through the hotel.

5.57 This new public space within the centre of the new development would have a distinctive and unique character providing a high-quality space for all users. The new courtyard would create a space for everyone to use and enjoy, providing opportunities to sit, move and dwell around raised planting, a water feature, and a signature tree.

5.58 The courtyard is to be an enjoyable public space where both passers-by and local residents (existing and new) can enjoy as well as hotel guests, office workers.

5.59 The courtyard design has been reviewed in close dialogue with planning officers, the design review panel and local stakeholders and residents. The plans to create new green



spaces were welcomed, with several local residents stating the new public courtyard will have a positive impact on the local community. During pre-application stage, a workshop was held with local residents to inform the proposals of the public courtyard.

### The Railway Garden

- 5.60 The Railway Garden is located at the east of the Site, adjacent to the railway cutting, and the existing brick wall separation.
- 5.61 This space would provide a new private, shared garden for all residents of two new residential buildings. This space would provide green scenery with a calm sense of togetherness, enhanced by steps and platforms to be shared by the users to enjoy the garden.
- 5.62 The landscaping and public realm improvements are further discussed in Section 11.

### **Access**

- 5.63 The development would deliver new pedestrian connections through the Site, both north-south between Wicklow Street and Swinton Street, and east-west between Wicklow Street and Gray's Inn Road.
- 5.64 The main pedestrian access points into the site would be as follows:
- Residential Block A from Swinton Street;
  - Residential Block B from Wicklow Street;
  - Office from Wicklow and Swinton Streets;
  - Hotel from Gray's Inn Road and Wicklow Street;
  - Gym from Swinton Street; and
  - Café/restaurant from Gray's Inn Road and Wicklow Street.
- 5.65 The scheme has been designed to connect, engage and provide new pedestrian connections between Wicklow Street and Swinton Street and Gray's Inn Road and Wicklow Street via the new public courtyard.

## **Car and Cycle Parking**

- 5.66 The Site is proposed to be car-free in line with the new Draft London Plan and Camden car parking standards, with only disabled car parking to be provided. This is appropriate given the high PTAL rating for the Site and has been agreed with both TfL and LBC.
- 5.67 The development proposes to retain the disabled bays on Swinton Street to serve the proposed residential, hotel and office uses. The two existing disabled bays on Wicklow Street would be relocated further east closer to the Block B residential entrance and an additional disabled bay would be provided. The two residential permit holder bays on Wicklow Street would be retained but relocated west slightly.
- 5.68 In total there will be seven disabled bays located within the immediate vicinity of the proposed development which exceeds the minimum Draft London Plan requirements for the residential uses (three disabled bays) hotel and office land uses (one disabled bay each).
- 5.69 As recommended by TfL, it is proposed to convert the redundant ambulance bay on Gray's Inn Road into a small taxi rank outside the hotel entrance to complement this future use and also the existing hotel on the corner of Gray's Inn Road and Swinton Street.
- 5.70 Cycle parking requirements for the Proposed Development are based on the minimum standards in Draft London Plan Policy T5 'Cycling'.
- 5.71 All long-stay cycle parking would be provided in secure and covered locations in line with Draft London Plan and the 'Camden Planning Guidance – Transport' (November 2018) document. Short-stay cycle parking would be situated within the public realm in visible, convenient locations which provide step-free access and are within 15m of the main entrance of their allocated residential core or non-residential unit.
- 5.72 The full breakdown of short and long stay cycle parking for each use, can be found in section 14, and the supporting Transport Assessment.

## 6 Consultation and Community Engagement

- 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 Paragraph 39-46 of the NPPF highlights the importance of pre-application engagement; 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.
- 6.4 Policy GG1 part A of the Intend to Publish London Plan encourages early and inclusive engagement with stakeholders and local communities on the development of proposals.
- 6.5 Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage and the more issues that can be resolved at pre-application stage, the greater the benefit.

### **Consultation Strategy**

- 6.6 The application proposals for the demolition and redevelopment of the Site have been subject to extensive consultation over a period since January 2020. The strategy is detailed in the accompanying Statement of Community Involvement.
- 6.7 The Applicant is committed to maintaining an ongoing dialogue with local communities and key stakeholders, to ensure they kept informed of the progression of the proposals following the submission of a planning application.

## Community Consultation

- 6.8 Initial engagement with key stakeholders took place from January to February 2020, to introduce the Applicant, the site and the early development principles. A public exhibition, open to all, was then organised, to show the community the Applicant's emerging design principles for the site. This was publicised extensively through a newsletter drop to local residents living in proximity to the site, as well as through letters and digital and print advertisements in the local media publication, the Camden New Journal. This exhibition was also supported by an online presence, including a dedicated website.
- 6.9 In May 2020, a newsletter was circulated to residents living in proximity to the site and other interested groups, providing an update on the project and informing them that further engagement would be undertaken by the Applicant on the proposals.
- 6.10 In light of Covid-19, and the Government advice regarding the Coronavirus, the second public exhibition was not able to be held in person. As a solution, a digital consultation was held to gain feedback ahead of the submission of a planning application.
- 6.11 Following the first public consultation, in light of Covid-19 restrictions, the applicant transferred its engagement strategy from a physical face to face engagement process, to online.
- 6.12 A consultation website was published in early July 2020 with stakeholders, local residents and business invited to provide their comments and feedback. This website was created to show residents how the proposals had changed following the public exhibitions in February. A video with the Applicant explaining the updated proposals and other materials were also uploaded to the project website, to illustrate how the plans had evolved following feedback from local stakeholders.
- 6.13 Meetings were held between July and October with key stakeholders including:
- Bee Midtown
  - Ward councillors
  - Knowledge Quarter
  - Derby Lodge TRA
  - Bloomsbury Residents' Action Group

- King's Cross and Brunswick Neighbourhood Association
- Camden Collective
- Bloomsbury Conservation Area Advisory Committee
- Water Rats Public House
- Westminster Kingsway College
- UCL / Ear Institute

6.14 A workshop was also arranged with community representatives, to ascertain their views on how the public courtyard could be utilised by residents to inform its design.

6.15 The full consultation strategy and responses are summarised in the Statement of Community involvement, prepared by London Communications Agency.

### **London Borough of Camden**

6.16 Extensive pre-application meetings have been held with planning and design officers from LB Camden since early Summer 2019. Meetings have also been held with internal departments at LB Camden such as Transport and Highways, Energy and Sustainability officers.

6.17 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.

6.18 Further details on the design development and changes made as a result of pre-application discussions are included within section 3 of the Design and Access Statement, prepared by AHMM architects.

### **Strategic Review Panel**

6.19 The design team met with the Strategic Review Panel (SRP) on the 27<sup>th</sup> April 2020 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 Heather Johnson (Chair of Planning Committee), Cllr Adam Harrison

(Cabinet Member for Improving Camden’s Environment) and Roger Freeman (Heritage Champion).

6.20 The SRP response acknowledged that the site is of strategic importance within the Knowledge Quarter and has the potential to deliver much needed affordable housing, affordable workspace and knowledge quarter uses with associated economic benefits for the local community. Comments were raised on the following:

- The need to retain the grain and character in working up redevelopment proposals
- The affordable housing and workspace provision
- The specification of the office and hotel buildings being tailored to the Knowledge Quarter’s specialist uses
- The extent of demolition and the sustainability credentials of the proposals
- Clarity on the economic opportunities the site delivers for local people and businesses and a strong employment and skills offer
- The relationship between the office building and the residential blocks
- The creation of new open space
- Accessibility of public realm to local community.

6.21 The Panel noted an under provision of affordable housing and workspace, the importance of sustainability across the site, and welcomed the introduction of public routes and spaces.

6.22 The response to advice received at the SRP has been addressed through the design evolution as set out within this Statement.

### **Design Review Panel Members**

6.23 Two Design Review Panel (‘DRP’) meetings have been held on 27 March and 28 August 2020. The review panels comprise 5 members alongside several key LB Camden Officers.

6.24 The first design DRP was held on 27 March 2020. Following the initial DRP, further analysis of the character of the existing context was required to understand how this could inform the development. The panel also wanted to “**see more of the fine grained ad-hoc nature**

**of the existing site incorporated into the proposals to avoid creating a development that feels corporate in nature.”**

- 6.25 The second DRP was held on 28 August 2020. The report issued following the second DRP considers **“the proposals much improved since the previous design review panel - in particular the approach to incorporating more of the fine grain character of the context into the large scale proposals.”**
- 6.26 The panel recommended some refinements to the distribution of massing, to ensure the scheme is successful in townscape terms.
- 6.27 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.

#### **LBC Development Management Forum**

- 6.28 On 25 August 2020, a presentation was given to LBC’s Development Management Forum. This provided residents with an opportunity to see the updated plans and submit any questions or comments they might to the Applicant.
- 6.29 Due to government guidelines, the meeting was held virtually. This meeting was attended by LBC officers, alongside local residents, which included representatives from the Bloomsbury Residents’ Action Group and Derby Lodge.
- 6.30 The purpose of the DMF was to familiarise local people with the proposals, and how these had evolved in recent months, prior to submission and enable local residents, businesses and organisations to ask questions of the applicant and design team and comment on the proposals.
- 6.31 A question and answer session was held with attendees thereafter. Attendees asked a series of questions, about the consultation the Applicant had undertaken with the community to date, the amount of affordable housing that would be provided in the development, how the proposed hotel complex would be utilised by local residents, and

details on the new public spaces. A number of questions focused on the proposed heights of the new buildings.

### **Developer's Briefing**

- 6.32 On 4 November 2020, a Developers' Briefing was arranged for the Applicant to present the final designs of the proposals for the site. Members LBC's planning committee, as well as the ward members for King's Cross, were in attendance.

### **Third Parties**

#### The GLA (Greater London Authority)

- 6.33 On 18 June 2020, a virtual pre-planning application meeting was held with the GLA. Subsequently, written advice was issued on 16 July 2020.
- 6.34 The written response acknowledged that:
- “The redevelopment of this surplus NHS site for a mixed-use development to include office use, a hotel, residential units and public amenity space responds positively to the Mayor's Intend to Publish London Plan policies in support of the strategic functions of the CAZ. The proposal would optimise the development potential of the site in an area well connected to public transport and is strongly supported in principle.”**
- 6.35 Furthermore, it was acknowledged that, **“The layout principles of introducing new pedestrian routes through the development as well as seeking to re-activate the majority of public facing frontages is strongly supported.”**
- 6.36 The advice concluded by requesting that all comments relating to the principle of development, housing, affordable housing, urban design, heritage, strategic views, inclusive design, inclusive access, and sustainable development needed to be addressed as part of any planning application submission coming forward. These comments have been considered throughout the design process, and section 3 of the Design and Access Statement, and section 9 of this statement explains how these have been addressed.



### Historic England

- 6.37 On 3 June, a video conference was held with Historic England. A written response was issued on 4 June confirming that they did not wish to comment on the proposals in detail.
- 6.38 The written response confirmed no objection to the principle of development, and Historic England welcome the general design approach. Furthermore, it was agreed that most of the existing buildings on the site detract from the character and appearance of the conservation area, and that the 1877 neo-classical former hospital at No. 330 Gray's Inn Road is the most significant historic building within the development site. Accordingly, as set out in the written response, the retention and restoration of the façade as part of the proposed development is welcomed.
- 6.39 Historic England raised an issue with the proposed roof extension, noting that this would detract from the contribution the building makes to the conservation area by undermining the original Italianate Palazzo form characterised by a symmetrical elevation topped by decorative balustrades concealing a shallow pitched roof. The design has since evolved to address these comments.

### Transport for London (TfL)

- 6.40 Steer Group issued a Transport Scoping note to TfL on 3 March 2020. On 2 April a virtual TfL pre-application meeting was held with officers from TfL and London Borough of Camden in attendance. A pre-application advice letter was issued on 24 April 2020.
- 6.41 TfL supported the improved permeability through the Site and provided recommendations on servicing, construction and travel, future plans for the local area, s.278/s.106 contributions and infrastructure protection.

### **Summary**

- 6.42 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.

- 6.43 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.
  
- 6.44 The applicant remains committed to maintaining an open dialogue with local communities and stakeholders throughout the determination and construction phases of the proposed development.

## 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 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) (2019)**

- 7.15 The Examination in Public (EiP) on the London Plan was held between 15 January and 22 May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor of London on 8 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 December 2019.
- 7.16 In March 2020 the Secretary of State for Housing, Communities and Local Government directed the Mayor to make specified changes to the Intend to Publish London Plan (IPLP). The Mayor cannot publish the plan until he has incorporated these changes, or the Secretary of State has withdrawn the direction following further negotiation. The regional component of the development plan therefore remains the London Plan (consolidated with alterations from 2016). However, the Mayor is giving significant weight to the IPLP and Camden is also giving weight to certain policies not

subject to challenge by the Secretary of State - such as the emerging cycle parking standards.

7.17 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.

7.18 The draft Plan is centred around Good Growth, with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The draft Plan recognises the key role of Central London as a driver for London and the wider UK economy with the City of London and the wider CAZ being critical in supporting growth.

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

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

### **Supplementary Planning Guidance**

7.20 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).

7.21 LB Camden have recently consulted on limited updates to CPG documents, focussing on amendments to reflect wider planning changes, or to provide clarification or updates. A new housing CPG is being prepared which combines the two existing adopted documents (Housing CPG2 and Interim Housing) into one document.

7.22 Once adopted, the CPG documents can be ‘material considerations’ in planning decisions, although they would have less weight than the Local Plan or other development plan documents

7.23 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**

7.24 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.

7.25 Consultation on the draft Site Allocations Plan document took place between 13<sup>th</sup> February and 27<sup>th</sup> March 2020. 330 Gray’s Inn Road 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 the aspirations of the draft allocations have been taken into account in the assessment of the proposals.

### **Legislative Framework**

- 7.26 Given the Site's location within a conservation area and near to listed buildings, statute regarding the historic environment is relevant.
- 7.27 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.
- 7.28 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.
- 7.29 On 21 July 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (the "Regulations" were laid before parliament and came 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.

### **Principal Planning Matters**

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



## 8 Land Use

- 8.1 This section assesses the proposed land uses and their acceptability, in principle, in planning policy terms. It concludes that the proposed mix of uses is acceptable in land use terms and that the uses are of an appropriate scale and balance in line with relevant planning policies.

### Principle of Development

- 8.2 The site is in a highly accessible location and would provide a mixture of uses comprising commercial, and residential, including affordable housing. It is therefore a suitable site for a large-scale development such as that proposed, and the principle of development would accord with the objectives of policy G1 of the Camden Local Plan which states **“The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by [inter alia] supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.”**
- 8.3 This would help support Camden’s role in contributing to the Central London economic and offer and has obvious synergies with the Knowledge Quarter which is also in accordance with policy G1.
- 8.4 As set out within the GLA’s pre-application response, the redevelopment of this surplus NHS site for a mixed-use development to include office use, a hotel, residential units and public amenity space responds positively to the Mayor’s Intend to Publish London Plan policies in support of the strategic functions of the CAZ. The proposal would optimise the development potential of the site in an area well connected to public transport.
- 8.5 The Proposed Development seeks to optimise previously developed urban land, which is in accordance with the character and established mix of uses in the surrounding area. The development would replace outdated buildings with a state of the art truly mixed-use development, consistent with the NPPF, London Plan, and Local Plan Policy G1.

### Mixed Use Policy

- 8.6 Promoting mixed-use development is one of the core principles of the NPPF, which suggests at paragraph 91 that mixed use developments can promote healthy communities.
- 8.7 Chapter 11 of the NPPF seeks to promote the effective use of land in meeting the needs for homes as well as other uses. Paragraph 118 sets out that planning decisions should encourage multiple benefits from mixed-use schemes whilst also giving substantial weight to suitable brownfield land.
- 8.8 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 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.
- 8.9 Policy GG2 of The Intend to Publish Draft London Plan seeks to enable mixed-use development on brownfield land and prioritising sites which are well-connected by existing or planned public transport. In addition, a development should **“proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”**.
- 8.10 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.
- 8.11 Policy H1 of the Local Plan sets out that self-contained housing is the priority land use across the Borough.
- 8.12 Policy H2 of the Local Plan states that where non-residential development is proposed the Council will promote and encourage the inclusion of self-contained homes as part of a mix of uses in all parts of the borough
- 8.13 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 would be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant.

8.14 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**

8.15 The Interim Housing CPG provides detailed guidance on calculating a site's capacity to provide housing, along with a split between market and affordable. Paragraph IH2.56 of the Interim Housing CPG states that any existing residential floorspace on the development site should be retained or replaced independently of the 50% target.

### Assessment

8.16 The proposed development is for a mixed-use development comprising office space, a new hotel, new homes, a gym and café/restaurant uses. The proposed development would see a total uplift of 20,302sqm. Under policy H2, this generates a requirement for 10,151sqm of that uplift to be provided as housing as a part of a mix of uses.

- 8.17 The Site is allocated (Policy IDS15 – 330 Gray’s Inn Road) within the Draft Site Allocations Camden Local Plan (2020) for **“a mixed-used development to include offices and other uses related to the knowledge and innovation economy, and permanent self-contained homes.”**
- 8.18 The amount of housing being proposed is 8,187sqm (GIA), which represents 40% of the total increase in floorspace, falling just short of the 50% required by policy H2.
- 8.19 A total of 4,503sqm (GIA) would be provided as market housing, and 3,752sqm (GIA) would be provided as affordable housing.
- 8.20 Whilst the overall residential provision does not meet the full 50% required by policy, a substantial quantum of housing is proposed, and 3,752sqm of affordable housing would be delivered, providing 35% of the affordable housing provision required under the mixed use policy, for a scheme of this size.
- 8.21 Given the site character and constraints, it is not possible to increase the provision of housing any further on the site. The proposed scheme has sought to maximise on-site delivery of housing and affordable housing whilst meeting the other aspirations for commercial uses and place making within this location.
- 8.22 Due to the financial viability of the scheme, a payment in lieu for the shortfall in housing is not possible in this instance.

### **Office**

- 8.23 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’**.
- 8.24 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

- 8.25 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 as one of these.
- 8.26 The emerging Intend to Publish London Plan (at policies E2 and E3) requires new office developments to provide a proportion of the floor space as affordable workspace.
- 8.27 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.
- 8.28 Policy E2 states that **“the Council will encourage the provision of employment premises and sites in the borough.”**
- 8.29 The Site is allocated (Policy IDS15 – 330 Gray’s Inn Road) within the Draft Site Allocations Camden Local Plan (2020) for **“a mixed-used development to include offices and other uses related to the knowledge and innovation economy, and permanent self-contained homes.”**

#### Assessment

- 8.30 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.**
- 8.31 The Proposed Development would deliver 13,275sqm of high-quality office space, across basement, ground and 7 upper levels.

- 8.32 The provision of a significant quantum of office floorspace would contribute towards Camden's forecast demand of 695,000sqm of office floorspace between 2014 and 2031.
- 8.33 The delivery of significant levels of employment space is supported at all policy levels and would meet the strategic and local demand for office floorspace, consolidate and improve the area's business offer as well as enhance London's strategic competitiveness in accordance with London Plan Policy 4.2, NLP Policy E1 and Camden Local Plan Policy E1.
- 8.34 The proposed floorplates, core positioning and services provision have been designed and developed to ensure the space is flexible and future proofed. Incorporating flexibility from inception would ensure the provision of a variety of office spaces for different tenant's dependent of market demands, in line with Intend to Publish Policy E2 (D).
- 8.35 The proposed provision of office space, with lab enabled space to support the Knowledge Quarter is supported by all levels of policy.
- 8.36 The scheme proposes the provision of 748sqm (GIA) affordable workspace as part of the mixed-use development which seeks to meet the policy aspirations of the Employment Sites and Business Premises CPG, and Local Plan policy E1. This would be located in the basement of residential Block B and would have a dedicated access off Wicklow Street.
- 8.37 It is acknowledged that the emerging KQ1 policy in respect of affordable workspace seeks 20% of additional employment floorspace as affordable. This is not achievable within these proposals due to viability and the intention to meet other policy objectives, including housing and affordable housing.
- 8.38 Given the draft status of the emerging policy, it can only be afforded limited weight in the determination of the applications.
- 8.39 The proposed scheme would create a significant number of jobs both during construction and once occupied and operational. Once constructed, it is estimated that the total number of jobs that would be generated by the office floorspace would be up to 870 jobs (note - this assumes an average employment density across the employment

floorspace of 1:16). The construction period of the scheme would also 670 jobs during the life of the demolition and construction.

- 8.40 The proposed scheme would provide high quality affordable workspace and would assist in promoting an increase of commercial floorspace in the CAZ as well as Camden. Therefore, the proposed office floorspace accords with the Intend to Publish London Plan draft policy SD4 and E1, and Local Plan policies E1 and E2.

### **Hotel Use**

- 8.41 London Plan Policy 4.5 and Policy E10 of the Intend to Publish London Plan seek to support the visitor economy as well as the needs of businesses and leisure visitors to the capital and highlight a strategic demand for new serviced accommodation in London
- 8.42 To ensure new visitor accommodation is in appropriate locations within the Central Activities Zone (CAZ), strategically important hotel provision should be focussed on its opportunity areas, with smaller scale provision in CAZ fringe locations with good public transport.
- 8.43 Policy E10 (Visitor Infrastructure) of the Intend to Publish London Plan also emphasises the importance of hotel accommodation growth within the CAZ. Paragraph 6.10.2 provides an updated hotel accommodation target of 58,000 bedrooms of serviced accommodation by 2041, equating to 2,230 bedrooms per annum.
- 8.44 Policy E3: Tourism of Camden's Local Plan (2017) recognises the importance of the visitor economy in Camden and will support tourism and visitor accommodation which will be directed to and located in Central London, particularly the growth areas Holborn, King's Cross and Tottenham Court Road.

### **Assessment**

- 8.45 The proposed development would provide 9,427sqm of new hotel use (Use Class C1) with a total of 182 rooms.

- 8.46 The site is located in the Central London Area where Local Plan policies G1 (Delivery and location of growth) and E3 (Tourism) seek to focus new development, maximise site opportunities and support hotel uses.
- 8.47 It is important to note that the new hotel would create a destination for visitors and local people. The ground floor comprises publicly accessible uses, including café and retail space which would add to the activity in the area and to the night-time economy.
- 8.48 The space would also create a new, key route connecting Gray's Inn Road to Wicklow Street and the new public courtyard.
- 8.49 Camden is recognised in national and regional policy as a particular growth area suitable for the provision of hotel rooms. Furthermore, given the Site's highly accessible location and its designation within the Central London Area, the principle of a large-scale hotel is supported by national, regional and local policy and would be considered acceptable.

### **Residential**

- 8.50 The Government's strategic objective as set out in the NPPF is to deliver a wide choice of high-quality homes and create sustainable, inclusive and mixed communities.
- 8.51 Chapter 5 of the NPPF supports the Government's objective of significantly boosting the supply of homes. Local planning authorities should plan for a mix of housing based on current and future demographic trends. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
- 8.52 Housing provision is a key priority of the London Plan, and policy 3.3 sets an annual housing target for the city of 42,000 net additional homes. It was noted by the Inspector at the Independent Examination of FALP (Further Alterations to the London Plan) that the revised housing targets proposed were short of what is necessary to address the housing crisis in London.
- 8.53 Table 3.1 of the London Plan subsequently sets out housing targets for each borough for the period 2015-2025. The annual average housing supply monitoring target for Camden is 889 units. Part E of Policy 3.3 outlines that this development capacity should be realised through the intensification of brownfield land; town centre renewal;



opportunity and intensification areas and growth corridors; and mixed-use redevelopment.

- 8.54 The annual average housing target in the Intend to Publish London Plan remains at a similar level of 1,038 units compared to other boroughs which have seen a significant increase in their targets. However, Camden Council seek to deliver housing above the Intend to Publish Draft London Plan targets and set out an ambitious target of 1,120 new homes per annum under Policy H1 of the Local Plan.
- 8.55 The Interim Housing CPG provides detailed guidance on calculating a site's capacity to provide housing, along with a split between market and affordable. Paragraph IH2.56 of the Interim Housing CPG states that any existing residential floorspace on the development site should be retained or replaced independently of the 50% target.

#### *Overall Housing Provision*

- 8.56 The proposals would provide 8,187sqm (GIA) of on-site residential accommodation. The proposals seek to provide a total of 76 residential units in a highly sustainable location.
- 8.57 The proposed residential units would assist in delivering much needed housing in Camden and London as a whole. Therefore, the proposed delivery of housing is in accordance with national, regional and local planning policies

#### *Housing Tenure and Mix*

- 8.58 The Dwelling Size Priorities Table within policy H7 of the Local Plan notes that for affordable (social rented) units, 2 and 3 bed flats are in high demand, and for intermediate 1 bed units are also in high demand with 2 bed units being in medium demand. The proposed unit mix for the affordable units provided responds well to the needs of the Borough and in accordance with policy H7.
- 8.59 The two proposed dedicated residential buildings have been separated into one affordable block and one market block. The proposed unit and tenure mix across the development is provided in table 6.

<b>Table 6: Proposed Tenure Mix</b>				
<b>Proposed Residential Tenure Mix</b>	<b>Studio</b>	<b>1-bed</b>	<b>2-bed</b>	<b>3-bed</b>
<b>Market</b>	17	9	16	2
<b>Social/Affordable</b>	0	0	1	6
<b>Intermediate</b>	0	19	6	0
<b>Total</b>	17	28	23	8
<b>% Mix</b>	<b>22%</b>	<b>37%</b>	<b>30%</b>	<b>11%</b>

- 8.60 As demonstrated in table 6, there would be a provision of 17 x studio apartments, 28 x 1-beds, 23 x 2-beds, and 8 x family sized units within the two residential buildings.
- 8.61 Due to the site's location and constraints, a lower provision of family-sized units is considered acceptable based upon the higher proportion of 2-bed units provided.
- 8.62 In accordance with local plan policy H7, the proposed development would contain a mix of large and small homes, contributing to the creation of mixed and inclusive communities.

#### *Accessible Housing*

- 8.63 The London Plan Housing SPG requires 10% of the total number of residential units to be designed to be wheelchair adaptable. Policy H6 of the Local Plan requires 10% of new building housing to be accessible or adaptable for wheelchair users.
- 8.64 In line with this requirement, 12% residential units have been designed to be wheelchair accessible.

#### **Affordable Housing**

- 8.65 Paragraph 61 of the NPPF sets out that the needs of housing different groups in the community should be assessed and reflected in planning policies. This relates to size, type and tenure including affordable housing.

- 8.66 Policies 3.10 to 3.13 of the London Plan define affordable housing, set targets and thresholds and relate to negotiation of affordable housing on schemes. The plan targets an average of at least 17,000 more affordable homes per year in London over the course of the Plan. Policy 3.12 seeks the maximum reasonable amount of affordable housing when negotiating on individual schemes, with housing normally provided on-site and, exceptionally, off-site.
- 8.67 The Affordable Housing and Viability Supplementary Planning Guidance, August 2017, explains how the policies of the London Plan should be carried into action with the aim of half of all new homes to be affordable.
- 8.68 The SPG sets out the threshold approach to applications. Under the Threshold Approach, development proposals that provide 35 per cent affordable housing and 50 per cent on public and industrial land (where industrial floorspace capacity is not being re-provided in line with policy E7, Industrial Intensification, co-location and substitution), and that meet tenure, affordability and other relevant requirements, can follow the Fast Track Route.
- 8.69 Affordable housing policy is taken forward in draft Policy H5 of the Intend to Publish London Plan, which states the strategic target of 50% of all new homes to be genuinely affordable; requires that major developments provide affordable housing through the threshold approach; and reaffirms that affordable housing should be provided on-site, with off-site / payment only in exceptional circumstances.
- 8.70 At a local level, Camden Local Plan Policy H4 states that the Council will aim to maximise the supply of affordable housing and exceed the borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31 and will aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.
- 8.71 Policy H4 identifies that the Council expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.

- 8.72 Policy H4 (e) goes on to state that an affordable housing target of 50% applies to developments with a capacity for 25 or more additional dwellings.
- 8.73 Policy H4 sets out that the guideline mix of affordable housing types is 60% social rented housing and 40% intermediate housing.
- 8.74 Camden Planning Guidance on Interim Housing (2019) provides specific guidance on both housing and affordable housing in mixed use development and specifically the requirements of Local Plan Policies H2, H4, and H6.

### Assessment

- 8.75 As encouraged by the NPPF and the London Plan, and Camden local policy the Proposed Development promotes a mixed-use scheme, including on-site affordable residential provision.
- 8.76 A total of 3,409sqm (GIA) or 32 units of affordable housing would be provided within the Swinton Street Building. This equates to 50% on a habitable room basis in accordance with the fast-track threshold approach in the emerging London Plan Policy as the site was formerly public sector land.
- 8.77 On a floorspace basis, the tenure split would be 40/60 (social rent/intermediate) and on a habitable room basis 32/68 split. Whilst the proposals do not accord with the Camden requirement of 60% affordable rent 40% intermediate, the provision of larger affordable rent apartments aligns with LBC's aspirations and is considered acceptable.
- 8.78 All of the affordable units would be located within the Swinton Street building.

### **Gymnasium**

- 8.79 Policy C3 of the Local Plan identifies that the Council would seek opportunities for new cultural and leisure facilities in major, mixed use developments.
- 8.80 A new gym would be provided across two basement levels, under the proposed office building. The gym would have two accesses, one off Swinton Street and the new Wicklow Courtyard.

### Café/Restaurant Uses

- 8.81 One of the core principles of the NPPF is to promote mixed use developments and encourage multiple benefits from the use of land in urban areas. Paragraph 85 of the NPPF seeks to promote “positive, competitive” town centre environments and to direct retail development to town centres in the first instance, recognising town centres as the heart of their communities.
- 8.82 London Plan Policy 4.3 promotes mixed use development and states that within the Central Activities Zone increases in office floorspace should provide for a mix of uses, unless such a mix would demonstrably conflict with other policies of the plan.
- 8.83 The Intend to Publish London Plan policy E9 states that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres.
- 8.84 The Mayor’s CAZ Supplementary Planning Guidance (1.4.5) identifies the need to have a sensitive approach to the application of mixed-use development within the CAZ. **“This is to ensure that the mix of uses support the CAZ strategic functions, maintain an appropriate balance between offices and residential use, encourage active ground floor frontages where appropriate and supporting a mix of uses that contributes to the unique character of the CAZ including culture, leisure and tourism uses, retail and food/drink.”**
- 8.85 At a local level, Local Plan Policy E1 part (i) recognises the importance of other employment generating uses, including retail uses. This policy sets out 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 by recognising the importance of education as an employment generating use.
- 8.86 The Proposed Development would deliver a café space at the front of the hotel building, fronting Gray’s Inn Road, and a restaurant space at the back of the hotel, onto the public courtyard.

8.87 These spaces are intended to be run by the hotel operator but remain flexible for a separate owner to occupy. The creation of new food and beverage spaces would ensure active frontages are created onto Gray's Inn Road and the new Wicklow Courtyard creating activity in and around the site.

8.88 It is therefore considered that the Proposed Development would align with LB Camden's aspirations for the site in its Local Plan and as set out within the draft site allocation, creating a mixed-use development including offices and other uses related to the knowledge and innovation economy, and permanent self-contained homes.

## 9 Design, Bulk and Massing

- 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.
- 9.3 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.
- 9.4 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.
- 9.5 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).
- 9.6 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.
- 9.7 London Plan Policy 2.10(A)(d) 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.

- 9.8 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.
- 9.9 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.
- 9.10 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.
- 9.11 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.
- 9.12 Policy D1B of The Intend to Publish London Plan requires new development to achieve indoor and outdoor environments that are comfortable and inviting for people to use. In addition, development should provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water



- 9.13 The 'Intend to Publish' version of the Intend to Publish London Plan policy D2 states that the density of development should be proportionate to the site's connectivity and access to public transport. Draft policy D3 sets out that all development must make the best use of land and use a design led approach to optimise the capacity of sites. Part B of the policy states that development proposals should have regard to form and layout, experience and respond to the quality and character of the surroundings.
- 9.14 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 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.
- 9.16 At a local level, policy C6 of the Local Plan seeks to promote access for all by expecting all buildings and places to meet the highest standards of accessibility and inclusive design
- 9.17 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.

### Assessment

- 9.18 This Section provides an assessment of design matters of each component of the development in the context of relevant policies, though a comprehensive commentary regarding the design approach and development is provided within the Design and Access Statement prepared by AHMM.

- 9.19 The design of the proposal has been carefully considered throughout the pre-application stage and is the result of a detailed process with input from LBC officers and other stakeholders.
- 9.20 The design proposals seek to respond to the variety of heights across the nearby context and the existing building on the site. The height and massing for the proposal has been materially altered through the pre-application process in response to detailed engagement with officers in relation to relationship with neighbouring buildings and impact within the Conservation Area.
- 9.21 The Proposed Development creates a positive relationship to the surrounding context and heritage assets. The development would deliver a mixed-use development of the highest specification whilst also delivering substantial social, economic and environmental benefits.

### **Hotel**

- 9.22 Section 5 of the DAS prepared by AHMM provides detailed analysis of the proposed design and materiality of the hotel building and should be read in conjunction with this section.
- 9.23 The proposed hotel building comprises the retained 330 Gray's Inn Road building, and two new build elements to the rear, onto the new Wicklow Courtyard. The hotel would create 9,427sqm of new C1 floorspace, delivering 182 new hotel rooms.

### *Height, Bulk and Massing*

- 9.24 A 1.5 storey extension is proposed on the retained building, increasing the height of the building by 2.7m to 35.025m (AOD). The extension is located behind the existing parapet and is set back by 1.5m, therefore the visual impact is considered to be minimal.
- 9.25 In line with local policy D1, the retained building would continue to integrate well with the surrounding streetscape creating an easily recognisable route through the site, contributing positively to the street frontage.

- 9.26 The new build element is delivered in two forms, a taller 14 storey element measuring 66.7m AOD, and a second 9 storey element measuring 52.77m AOD.
- 9.27 The taller elements of the hotel are separated from the existing building by the enclosed courtyard. The massing of the proposed hotel building has been the focus of design discussions with LBC Planning, Design and Conservation Officers, and the proposed scheme addresses those discussions.
- 9.28 In response to the existing context, the taller element of the hotel is set back from Gray's Inn Road where the tallest building on the site is currently located; the former Ward Buildings.
- 9.29 The taller, slender element of the hotel has a vertical appearance. At the seventh floor, there is a set back of 4.5m on the Gray's Inn Road elevation. At the eleventh floor, a new set back is introduced on the southern and western corners, creating a smaller footprint.
- 9.30 The introduction of setbacks creates visual interest onto Gray's Inn Road, and the sculpting of the lower volume seeks to further establish a relationship with neighbouring buildings and the rest of the development site providing a greater variety in heights and gaps between buildings.
- 9.31 The formal pre-application response received from the GLA considered the broad massing and range of heights as **'strategically acceptable subject to submission of a townscape and visual impact assessment'**. As set out within the supporting HTVIA prepared by PSC, the proposed hotel massing "represents a general increase in height, massing and scale compared to the Site's existing buildings, this is fitting in the context of the Site's significance and the opportunity it offers to support an evolving knowledge quarter in the King's Cross area." Further information regarding the townscape impact can be found in section 10 of this Statement.
- 9.32 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 retention of the existing frontage, an active frontage, and the creation of a route through the site accords with part f) of policy D1.

- 9.33 In accordance with policy D4 of the ItP London Plan, the submitted DAS covers the detail relating to the hotel layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping.

### *Materials*

- 9.34 Glazed terracotta has been selected as a single material which can be varied and shaped to express different forms of articulation across the two volumes. The building volumes are distinctly different, each volume has a different orientation of expression and are glazed in two colours which reflect the surrounding buildings.

The proposed materials have been selected to ensure that the architecture makes a positive contribution to the streetscape and wider cityscape, in line with London Plan policies 7.4 and 7.5, and local policy D1.

### **Office Building**

- 9.35 Section 6 of the DAS prepared by AHMM provides detailed analysis of the proposed design and materiality of the office building and should be read in conjunction with this section.

### Height, Bulk and Massing

- 9.36 The proposed seven storey office building measures 52.8m AOD at its highest point. The top two floors of the office building are set back on all elevations, resulting in a shoulder height of 43.81m AOD.
- 9.37 The height and massing of the office building has been shaped in response to discussions with LB Camden and the local community, as well as analysis of the townscape and visual impact and the daylight effects of the building.
- 9.38 The elevation along Wicklow Street is angled to respond to the immediate character and curvature of Wicklow Street. This also responds to Local Policy D1 ensuring the provision of visually interesting frontages at street level.
- 9.39 Setbacks at the upper levels would help to ensure its street scale is fitting for its frontages on Swinton Street, Wicklow Street, and in relation to the new courtyard.

- 9.40 The office building seeks to marry up with the existing parapet lines of the Point A Hotel on Swinton Street and Depot Point on Wicklow Street with setback floors above. The massing on Swinton Street steps down from the taller existing buildings to the junction with Gray's Inn Road and the Victorian terraces to the east of the site.
- 9.41 In considering the character, setting, context and form and scale of neighbouring buildings, the proposed massing accords with London plan policies 7.5 and 7.6 and local plan policy D1.

### Design and Layout

#### *Ground Floor*

- 9.42 The primary access into the office reception is through two doors which front the new Wicklow Courtyard. The two-storey tall colonnade, at ground floor, creates a greater sense of arrival for those visiting and working within the office while also increasing the width of the courtyard.
- 9.43 A secondary access point is located on Wicklow Street, which would provide secure 24-hour access for tenants.
- 9.44 The Swinton Street ground floor would provide office accommodation, and a loading bay to serve all commercial uses on the site.
- 9.45 The office accommodation on the Swinton Street ground floor, provides the flexibility to be either one demise, or split into two smaller spaces for start-ups and incubators. The floorplates have been designed to enable the spaces to be used by different tenants. The floorplate to the southwest can be accessed either from the central core, or directly from Swinton street.

#### *Upper Floors*

- 9.46 The office accommodation on the typical floors is designed to be flexible and adaptable to meet a range of requirements for a variety of tenants, ensuring maximum efficiency.

- 9.47 The large open plan floorplate is organised around a central core, providing floors which are easily divided into one, two, three, or four-way splits. While generous floor to floor heights allow for large windows to allow deep penetration of daylight & minimise use of artificial lighting.
- 9.48 The proposals would provide a high quality, contemporary office space which would improve the site's relationship with its surroundings through an appropriate and higher quality design and use of high quality of materials and improved detailing in accordance with the objectives of The Intend to Publish London Plan Policy D2 and local plan policy D1 and Camden's Planning Guidance SPD.

### *Materials*

- 9.49 Sections 6.5 to 6.9 of the submitted DAS explore the material approach for the facades of the office building. The office building is proposed to respond to the two distinct characters of Swinton Street, and Wicklow Street, with each facade adapting and transforming to respond to the surrounding properties.
- 9.50 It is considered that the Proposed Development would secure the delivery of a high-quality building that respects and positively responds to the local context and character.
- 9.51 It is considered the Proposed Development would provide an exemplary design in a prominent location. The proposals have also been considered by Camden's Design Review Panel. The proposals therefore fully comply with the NPPF, London Plan policy 2.10, 7.1, 7.2, 7.4, 7.5 and 7.6, Intend to Publish London Plan draft policy D2-D5, Local Plan policy D1 and C6 and the Design CPG.

### **Residential**

#### *Height, Bulk and Massing*

- 9.52 The proposed residential buildings are to be read as a pair. The Wicklow Street building has a maximum height of 56.4m AOD (ground plus eleven storeys). The Swinton Street building has a maximum height of 38.4m AOD (ground plus five storeys).

*Swinton Street*

- 9.53 The height of the Swinton Street residential building is formed by the existing Victorian terraces to the east of the site.

*Wicklow Street*

- 9.54 The Wicklow Street residential building occupies a portion of the site where there are no current buildings and sits adjacent to the railway cutting and two vacant plots opposite; we therefore believe the site can accommodate a taller building here.
- 9.55 The eastern elevation of the building steps back at second floor, setting back the residential units from the office building. These setbacks provide external terraces for the apartments located on the east elevation. Setbacks are also introduced on the west elevation, accordingly the building would cantilever over the existing sewer and railway garden below on Wicklow Street
- 9.56 As set out further within section 10 of this Statement, the scale, massing and architectural expression of the proposed residential buildings are equally responsive to their different contexts.

*Design and Layout*

- 9.57 The proposed residential units have been designed and planned to comply with the requirements set out in the London Plan Housing Supplementary Planning Guidance (March 2016) and the ItP London Plan.
- 9.58 In line with Camden Local Plan Policy D1 and the LBC Design Guide CPG, the proposed works have been designed to the highest quality.
- 9.59 The minimum space standards set out at London Plan Policy 3.5 are exceeded for the proposed housing.
- 9.60 It is proposed that the majority of the residential units would be dual aspect and would have good daylight levels, with all units having good floor-to-ceiling heights. The report on Daylight and Sunlight, prepared by Point 2, demonstrates that the units would receive good levels of sunlight and daylight. This is discussed in further detail in Section 14 of this Planning Statement.

9.61 It is considered that the proposed residential units would be of good design quality. This is set out in more detail within section 7 of the Design and Access Statement prepared by AHMM.

9.62 **Inclusive Access**

9.63 Part B of the Intend to Publish London Plan Policy D5 requires that development proposals should achieve the highest standards of accessible and inclusive design. Proposals should deliver high quality people focused spaces, which are convenient and welcoming with no disabled barriers.

9.64 The scheme has sought to incorporate the principles for inclusive design wherever possible, with inclusive access to all parts of the proposed building.

9.65 The design of the external space has been carefully curated to ensure that all surfaces, routes and access points are clearly defined through the architecture and landscape design. All entrance levels are at grade. All circulation ramps and staircases comply with Building Regulations requirements.

9.66 The development meets Fire Regulations, and both the means of escape for occupants, and accessibility for the Fire Brigade, has been carefully considered in the design of the proposed buildings.

9.67 The café / receptions spaces within the hotel and office buildings and landscape around it has been developed to include ramped and stepped access directly from street level from Gray's Inn Road and Wicklow Street.

Summary

9.68 The evolution of the proposed design, including original concepts and design development, as well as the underlying design rationale, are set out in more detail in AHMM's Design and Access Statement submitted with this planning application. The final scheme design has evolved throughout the pre-application process in response to feedback from a range of stakeholders including the London Borough of Camden, the GLA, TfL, local amenity groups and local residents.

9.69 In summary, the design and material choices are considered to be of an exceptional quality and durability as sought by London Plan Policy 7.6 and Local Plan Policy D1



The Proposed Development is of a high quality and provides an active frontage and visually interesting street level elevations at the local scale and an attractive appearance, particularly when compared with the existing ad-hoc buildings. The bulk and massing of the Proposed Development is considered to be acceptable in accordance with London Plan policies 7.4, 7.5, 7.6 and 7.7, Intend to Publish Policy D8, and Local Plan policy D1.

- 9.70 The Proposed Development therefore fully accords with the design policies and aspirations of national, regional, and local policy.

## 10 Heritage, Townscape and Views

- 10.1 This section assesses the Proposed Development within the context of its historic environment and the statutory duty to have special regard to the desirability of preserving the listed buildings, their settings, or any features of special architectural or historic interest, and conservation areas. This chapter sets out the significance of the designated and non-designated heritage assets (the adjacent conservation areas and surrounding listed buildings) in order to inform an assessment of the proposals according to the criteria set out in the NPPF in relation to harm and benefit. The proposals are then considered against relevant national, regional and local heritage planning policy and guidance.
- 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 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 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.

- 10.7 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.
- 10.8 The process of collecting baseline data involved identifying the relevant HAs included in the following documentary and mapping resources:
- Historic England on-line National Heritage List for England;
  - Statutory List of Buildings of Special Architectural and Historic Interest;
  - LBC Development Plan Documents and other guidance (including conservation area character appraisals);
  - London Borough of Islington ('LBI') conservation area Character Appraisals;
  - The Buildings of England: London 4: North, B Cherry and N Pevsner, Yale UP, 2002.
- 10.9 There is no information relevant to this assessment that is available in other Historic Environment Records that is not available in the sources identified above that we have used to compile the baseline.
- 10.10 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.

- 10.11 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.
- 10.12 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.
- 10.13 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.
- 10.14 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.
- 10.15 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.
- 10.16 London Plan Policy 7.9 states that regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant to so they can help stimulate environmental, economic and community regeneration.
- 10.17 Paragraph 7.29 emphasises that:
- “Ensuring the sensitive management of London’s historic assets, in tandem with the promotion of the highest standards of modern architecture, would be**

**key to maintaining the blend of old and new that gives the capital its unique character.”**

- 10.18 With regard to the London View Management Framework, 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.
- 10.19 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.
- 10.20 The Intend to Publish London Plan policy HC3 states that Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.
- 10.21 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.
- 10.22 The King’s Cross Conservation Area Statement was issued in 2004 describes the history, character and appearance of the conservation area.
- 10.23 The Bloomsbury Conservation Area Character Appraisal and Management Strategy (BCAA) was adopted on 18 April 2011. It identifies a number of character sub-areas within the conservation area. The Site lies opposite ‘*sub-area 14: Calthorpe Street / Fredrick Street*’.

## Assessment

- 10.24 The proposals and their impact on heritage assets are considered in the Townscape, Visual Impact and Built Heritage Assessment (TVIBHA). In accordance with the NPPF methodology, the TVIBHA identifies the relevant designated Heritage Assets, assesses their significance and considers the effect of the proposals on them. This Planning Statement summarises some of the main points.
- 10.25 The Site is located in the south-east corner of the King's Cross/St Pancras Conservation Area, within an area defined by LBC as sub area 4: Gray's Inn Road. The Site does not contain any Listed Buildings or Locally Listed Buildings, although it does include buildings identified by LBC as making a positive contribution to the conservation area, and others that make a negative contribution.
- 10.26 The Site has a fragmented townscape character overall and its principal contribution to the conservation area is the street frontage to Gray's Inn Road, forming part of a group of buildings that are varied in age, use, architectural style and height. An analysis of the contribution of the existing buildings on the Site to the significance of the King's Cross / St Pancras Conservation Area is provided in Appendix A of the TVIBHA.
- 10.27 As set out within the TVIBHA, the area around the Site in general has been subject to significant change since these buildings were built. It includes post-war and modern development, some large in scale, making for a noticeably varied townscape context, typical of this part of Camden. Similarly, in respect of the CAs considered, these are located within a fragmented urban context that includes buildings of different periods, scales and varied architectural quality.
- 10.28 The Site, in its existing state, makes some contribution to the heritage significance of the CA within which it lies, and this is principally related to the Site's original hospital building at no.330 Gray's Inn Road. The Site's building at no.330 Gray's Inn Road is considered by LBC to have group value with the neighbouring Swinton House and the Water Rats public house, all of which are identified to make a positive contribution to the CA. The Site does not contribute to the heritage significance of other identified Heritage Assets.

- 10.29 The response to the historic setting of the King’s Cross Conservation Area and the adjoining Bloomsbury Conservation Area is discussed in greater detail in the accompanying TVIBHA submitted with this application. It is considered that 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.
- 10.30 In terms of height and massing, the Proposed Development would sit comfortably with the existing building scales on the streets it addresses. The massing of the office building has been broken up to ensure that its scale is suited to the both the primary and secondary streets on which it lies. The taller hotel and residential buildings represent a step up in scale compared to their immediate neighbours, this is considered appropriate in townscape terms by virtue of their situation overlooking a major central London thoroughfare and a railway line respectively.
- 10.31 It is concluded that there is no harm to the significance of any heritage asset. The assessments of the effects of the Proposed Development on each of the heritage assets is set out in detail in the TVIBHA prepared by Peter Stewart Consultancy.
- 10.32 The TVIBHA notes that **“in the case that any harm was considered by others to be caused by the Proposed Development, this 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. Any such harm would be more than outweighed by considerable enhancements to the Site - tangible public benefits that will also be felt well beyond the Site’s boundaries. These include the provision of new routes and spaces within the Site that will enhance local connections, and high quality architecture and public realm that directly reinforces the character and appearance of the King’s Cross/St. Pancras CA.”**
- 10.33 Overall, the proposed development would form a high quality and characterful scheme, with appropriately scaled buildings that would either enhance or have a neutral effect on the local and wider views and townscape in which they would be visible. It would have no effect on the LVMF views assessed in this report. It would create a welcoming environment that strengthens sense of place and encourages social interaction. In respect of design considerations, the Proposed Development is

in accordance with the policies, principles and guidance on design set out in the NPPF and PPG; London Plan policies; and London Borough of Camden policies and SPDs.



## 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 Paragraph 150 of the NPPF states that new development should mitigate impacts of climate change through suitable adaptation measures including green infrastructure.
- 11.3 Policy 7.5 of the London Plan, on Public Realm, seeks to ensure that London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Public realm should be comprehensible at a human scale using gateways, focal points and landmarks as appropriate to help people find their way.
- 11.4 Policy G1 (D) of the Intend to Publish London Plan requires that development proposals include appropriate elements of green infrastructure, such as street trees, green roofs, and natural or semi-natural drainage features.
- 11.5 ITP Policy G5 of the Intend to Publish 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.
- 11.6 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.

- 11.7 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.
- 11.8 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

- 11.9 A key element of this mixed-use development is the provision of public space for the local area and improvements to the surrounding public realm. A variety of open spaces are to be provided as part of the development, comprising public and private spaces. The public realm has been designed by EAST Landscape.

#### **Wicklow Courtyard - Public Courtyard**

- 11.10 Wicklow Courtyard is a new public courtyard designed between the hotel and office buildings providing a space to sit, move and dwell. The courtyard has been designed to allow free movement of people through it and onto the new routes through the base of the hotel and office buildings out onto adjacent streets.
- 11.11 As set out in the previous section of this planning statement, to enhance this space and create a genuinely usable space, surrounding ground floors provide active frontages and public uses.
- 11.12 The space would comprise re-used materials from the existing site. The bricks and stones from the former hospital façade would be re-laid in different paving patterns on the ground, bringing the historical textures through to the new development, creating a sense of local identity relating to the history of King's Cross.

11.13 A mature specimen tree, Black Walnut, proposed to define the space and signify the public courtyard whilst being a reminder of King’s Cross industrial history.

11.14 In line with policy A2, the introduction of Wicklow Courtyard would provide a new open space serving the existing and new community. The space has been designed in line with London Plan policy 7.5 to relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

11.15 In accordance with London Plan policy D7, the new public realm is providing a drinking water fountain in Wicklow Courtyard and in the Railway Garden.

**11.16 Residential Gardens**

11.17 A shared, private residential garden is proposed between the residential buildings on Swinton Street and Wicklow Street. The residential garden is split into three-character areas:

- The Railway Cut
- The Flying Carpet
- The Upper Railway Garden

11.18 The private, shared garden can be accessed from Swinton Street and Wicklow Street. The space is located at the upper Swinton Street level to maximise the amount of daylight and sunlight into the space and steps down towards the railway line where access to an existing sewer is required and opens towards the East for views and light.

11.19 The apartments at this level benefit from direct access and have their own private amenity defined by planting and low walls. The garden steps up at the Northern end where a raised zone with rooflights and trees are located above the affordable workspace below.

11.20 The overall greening strategy is thought to be supportive of the biodiversity throughout each season.

11.21 In line with Policy G1 (D) and G5 of the Intend to Publish London Plan, the residential gardens would incorporate permeable surfaces and high quality landscaping comprising a variety of plants and trees.

### **Office Building**

11.22 The office floorspace would benefit from the provision of 400sqm of external amenity space as a result of setbacks along the eastern elevation at second to seventh floor levels. The external terraces are located on the second, fourth, fifth and sixth floors, to reduce any overlooking from office tenants into the residential units and shared garden. The terraces provide outdoor amenity that is shielded from the residential through the use of planters.

11.23 These external spaces would provide private amenity space for the office occupiers, encouraging wellness, in line with Camden Local Plan Policy A2.

### **Amenity and Play space**

11.24 London Plan Policy 3.6 requires new development to make provision for play and informal recreation based on the expected child population and an assessment of future needs. A methodology for ascertaining the likely child occupancy level of a new development is set out in the Mayor's SPG Providing for Children and Young People's Play and Informal Recreation.

11.25 Draft Policy S4 of the Intend to Publish Draft London Plan states that **“development proposals for schemes that are likely to be used by children and young people should... *inter alia*... for residential developments, incorporate good quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child...”**

11.26 Camden Local Plan Policy A2 states that the Council will apply a standard for open space of 9sqm per occupant for residential schemes and give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space. Development contributions for open space enhancements using S106 are also considered appropriate.

## Assessment

- 11.27 In terms of residential quality, the new housing proposed would meet and exceed the Intend to Publish London Plan space standards, feature private outdoor amenity space with each flat having their own balcony or terrace and access to the shared, private residential gardens.
- 11.28 For a development of this size, the GLA Child Yield Calculator requires a total of 177.1sqm of playspace provision. The Railway Garden would provide a total of 194.4sqm of playspace
- 11.29 Play provision is provided for all age groups, with each new play space catering to varied age groups. Play provision for younger children (0-4 years) is integrated through the railway garden, whilst provision for older children (5-11+) would be found on the Railway cut and on the flying carpet.
- 11.30 The play equipment would be minimalist, or nature based, to enhance the characterful identity of the railway cut, though by providing varied and challenging play.

## 12 Energy and Sustainability

12.1 This section assesses the proposed energy and sustainability strategy and its acceptability in planning policy terms. It concludes that the Proposed Development is highly sustainable in full accordance with relevant adopted and emerging planning policies.

### Policy

12.2 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

12.3 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.

12.4 Chapter 5 of the London Plan considers climate change. Policy 5.1 of the London Plan focuses on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this. Policy 5.2 of the London Plan states that proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy:

- Be lean – use less energy;
- Be clear – supply energy efficiently; and
- Be green – use renewable energy.

12.5 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.

12.6 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.

- 12.7 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.
- 12.8 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures. Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.
- 12.9 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.
- 12.10 In 2020, LB Camden published the Camden Climate Action Plan (2020-2025) which sets out the Council’s ambition for a zero carbon Camden by 2030.

### **Assessment**

- 12.11 The application is accompanied by an Energy and Sustainability Assessment, a whole life-cycle carbon assessment and a Circular Economy Statement prepared by XCO2. This section provides an overview of how the proposed development accords with the aspirations of national, regional and local planning policy.
- 12.12 The submitted whole life carbon assessment analyses three scenarios to determine the most appropriate development route for the site, in line with local policy CC2. The report recommends the implementation of the proposed development (scenario 1).

- 12.13 As explored in detail in the submitted whole life carbon assessment, the proposed development will enable a more flexible and long-lasting development that can adapt to future changes in building uses, which will exceed the GLA's whole life carbon benchmarks.
- 12.14 The energy strategy has been developed in line with the energy policies of the London Plan and of the Camden Local Plan. The three-step Energy Hierarchy has been implemented and the estimated regulated CO<sub>2</sub> savings on site are 50% for the domestic part and 41.2% for the non-domestic part of the development, against a Part L 2013 compliant scheme with SAP10 carbon factors. The regulated CO<sub>2</sub> savings for the site as a whole are 42.1% with SAP10 emission factors.
- 12.15 The shortfall to a zero-carbon reduction from baseline for the new build would be mitigated by a payment in lieu to the London Borough of Camden at a rate of £95/tonne.
- 12.16 At the 'Be Lean' stage, The proposed development is expected to meet the GLA target of 10% regulated CO<sub>2</sub> emission reductions for the residential portion of the scheme, and a 15% reduction for the non-domestic portion of the scheme.
- 12.17 A site heat network is proposed; this would comprise a single energy centre supplied by air source heat pumps (ASHPs) and high efficiency electric boilers and would be connected to the development of all uses on site.
- 12.18 The energy centre comprises part of the "rooftop and basement plant" within the description of development.
- 12.19 For the commercial part of the development, it is assumed that ASHPs would supply 100% of the heating and cooling demand, with the domestic hot water demand served by 50% ASHPs and 50% electric boilers. For the domestic part of the development the heating and domestic hot water load would be supplied via 50% ASHPs and 50% electric boilers.



- 12.20 The proposed development aims to reduce internal water consumption to less than 105 litres per person per day, in line with the recommended target set out in the GLA's Housing SPG.
- 12.21 The proposed scheme would achieve an Urban Greening Factor of 0.22. As set out within appendix A of the submitted Sustainability Statement with the inclusion of all practical measures, the residential part of the development achieves a UGF of 0.34, while the commercial part of the development achieves a UGF of 0.15.
- 12.22 As described in the Detailed Circular Economy Statement, circular economy principles would 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 would 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 would be prioritised where possible. This would promote resource efficiency and effective management and reduction of construction waste. Where reuse is not possible, construction materials would 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.
- 12.23 The proposed development complies with the London Plan and Camden Local Plan CO2 savings target of 35% overall. In accordance with Camden Planning Guidance on Energy Efficiency and Adaption, the proposed development exceeds the target of 20% reduction in carbon dioxide emissions from on-site renewable energy technologies.
- 12.24 The redevelopment would target 'BREEAM Outstanding with a minimum commitment to BREEAM Excellent. The full details of the BREEAM pre-assessment are included within the submitted sustainability statement prepared by XCO2.
- 12.25 The design of the Proposed Development has considered environmentally sustainable measures from nine thematic areas: Energy and CO2 emissions, water, materials, circular economy and waste management, pollution, health and wellbeing, management, ecology and transport.

12.26 Accordingly, the Proposed Development would meet the local, regional and national planning policy requirements for energy and sustainability.

## 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 - Policy**

- 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’ and, where reduction measures are required, these are made on Site.
- 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 (AQMAs).

- 13.7 Intend to Publish London Plan Policy SI2 Minimising greenhouse gas emissions requires major developments are net zero-carbon, through reducing greenhouse gas emissions during operation through being lean, clean and green. Major proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met.
- 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.

## **Air Quality - Assessment**

- 13.13 The Air Quality Assessment, prepared by AQC, has considered the impacts of the proposed development on local air quality in terms of dust and particulate matter emissions during construction, emissions from road traffic generated by the completed and occupied development, and emissions from the backup diesel generators. It has also identified the air quality conditions that future residents and users would experience.
- 13.14 The Site lies within a borough-wide Air Quality Management Area (AQMA) declared by the London Borough of Camden (LBC) for exceedances of the annual mean nitrogen dioxide (NO<sub>2</sub>) objective. It is also within the GLA's King's Cross / Caledonian Road Area air quality Focus Areas; these are locations with high levels of human exposure where the EU annual mean limit value for nitrogen dioxide is exceeded.
- 13.15 The construction works have the potential to create dust. During construction, it would therefore be necessary to apply a package of mitigation measures to minimise dust emissions. Appropriate measures have been recommended and, with these measures in place, it is expected that any residual effects would be 'not significant'.
- 13.16 The proposed development would generate traffic on the local road network, but the assessment has shown that there would be no significant effects at any existing, sensitive receptor. The assessment has demonstrated that, with mitigation in place, future residents and users of the development would experience acceptable air quality.
- 13.17 Overall, the construction and operational air quality effects of the proposed development are judged to be 'not significant'. The proposed development has also been shown to meet the London Plan's requirement that new developments are at least 'air quality neutral'.
- 13.18 The Proposed Development therefore complies with London Plan policy 7.14, Draft London Plan policy S11 and Local Plan policy CC4.

## Daylight / Sunlight

- 13.19 Paragraph 127 of the NPPF refers to securing a good standard of amenity for all existing and future occupants of land and buildings.
- 13.20 Policy 7.6 of the London Plan states that planning decisions in respect of buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.
- 13.21 The Intend to Publish London Plan policy D6(D) states that the design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

### Assessment

- 13.22 The Proposed Development has been assessed in terms of its potential for impact on the amenity of the surrounding sensitive receptors. A Daylight and Sunlight Assessment has been prepared by Point2, in accordance with the 2011 BRE Guidelines on Daylight and Sunlight, and this is submitted as part of the planning application
- 13.23 As set out in the report prepared by Point 2, the level of massing has been developed to ensure it effectively responds to the intended flexibility of the BRE Guidelines, with reference to the Mayor of London Plan and National Planning Policy Framework which recommends the use of alternate daylighting targets. Accordingly, a target of 15% VSC has been identified, which is based on numerous planning and GLA decisions and planning appeals, including the view adopted within the London Borough of Camden on other applications.
- 13.24 Notwithstanding that some properties experience noticeable reductions in daylight as a result of the Proposed Development, the vast majority of the windows assessed continue to retain above the 15% VSC target. There are a small handful of windows

that fall in the band below (between 11%-13%) however this is not unusual within a dense urban area and indeed echo's the view of Inspectorates at Appeal.

- 13.25 With regards to the proposed internal daylight the scheme demonstrates a good level of compliance with BRE Guidance in terms of internal daylight amenity with over 88% of the rooms on the first five floors meeting their ADF target value in the 'as built' position.
- 13.26 It is acknowledged that decision makers should recognise that the levels of daylight achieved by the units which fall below the targets, is similar to some existing units within the vicinity of the site. Policy SPG10 advises that daylight targets should be assessed on broadly comparable residential typologies, which this Proposed Scheme is.
- 13.27 Overall, the proposed scheme has been designed well to allow good levels of daylight to penetrate into the proposed units and distribute throughout the rooms efficiently, especially in consideration of the it being located in an urban area.

## 14 Transport, Waste and Servicing

14.1 This section assesses the acceptability of the proposed transport, access, servicing, refuse and trip generation of the Proposed Development in planning policy terms. It concludes that the transport principles accord with relevant adopted and emerging planning policies.

### Transport – Policy

14.2 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 would 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.

14.3 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.

14.4 Paragraph 109 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

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 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.
- 14.7 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.
- 14.8 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.

**Transport – Assessment**

- 14.9 The Site is proposed to be 'car-free' in line with the Intend to Publish London Plan The only vehicular access to the Site would be to the proposed service yard located off Swinton Street. The vehicular crossover to the service yard has been designed to provide appropriate visibility, both for oncoming vehicles along Swinton Street and pedestrians along the northern footway.
- 14.10 The existing crossover on Swinton Street which provides access to a hard standing parking area and the crossover on Wicklow Street which provides access to the existing hospital service yard would be removed and reinstated as kerbed footway.
- 14.11 The proposed development puts people first and achieves strategic and local transport objectives through:

- New active frontages and the new public realm to the north, including enhanced natural surveillance and new pedestrian routes between Wicklow Street and Swinton Street, and Gray's Inn Road and Wicklow Street.
- Significant increase in permeability throughout the site.
- High-quality short- and long-stay cycle parking in accordance with the Draft London Plan and Camden Planning Guidance for Transport.
- Car free development, with the exception of disabled car parking spaces (three for residential, one for hotel and one for office).
- Managing deliveries and refuse collection to minimise their impacts upon other users.

14.12 The scheme has been designed to connect, engage and provide new pedestrian connections between Wicklow Street and Swinton Street and Gray's Inn Road and Wicklow Street via a new public realm area.

#### **Car and Cycle Parking – Policy**

14.13 In terms of emerging policy, Policy T5, and table 10.2 of The Intend to Publish London Plan sets out minimum cycle parking standards for new developments.

14.14 The Site is proposed to be car-free in line with the new Draft London Plan car parking standards, with only disabled car parking to be provided. This is appropriate given the high PTAL rating for the Site and has been agreed with both TfL and LBC.

14.15 The development proposes to retain the disabled bays on Swinton Street to serve the proposed residential, hotel and office uses. The two existing disabled bays on Wicklow Street would be relocated further east closer to the Block B residential entrance and an additional disabled bay would be provided. The two residential permit holder bays on Wicklow Street would be retained but relocated west slightly.

#### **Car and Cycle Parking – Assessment**

14.16 Cycle parking for the Proposed Development has been calculated in line with the draft London Plan.

14.17 All long-stay cycle parking would be provided in secure and covered locations in line with Draft London Plan and the 'Camden Planning Guidance – Transport' (November 2018) document. Short-stay cycle parking would be situated within the public realm in visible, convenient locations which provide step-free access and are within 15m of the main entrance of their allocated residential core or non-residential unit.

14.18 121 residential long-stay cycle spaces would be provided (split 54 for Block A and 67 for Block B), with 10% of spaces provided using a mix of Sheffield stands, half-height stands and ground fixings to accommodate non-standard/adapted bikes and encourage inclusive cycling. Two-tier racks would provide the majority of spaces.

<b>Residential Block</b>	<b>Long-Stay Cycle Parking</b>	<b>Short-Stay Cycle Parking</b>	<b>Total</b>
A	54	1	55
B	67	2	69
<b>Total</b>	<b>121</b>	<b>3</b>	<b>124</b>

14.19 The residential cycle stores are accessed via Wicklow Street and Swinton Street respectively, with suitably large lifts and cycle wheel ramps provided via the stairs leading to each respective residential basement area.

14.20 The shared commercial cycle store is located at basement level and would be accessed from Wicklow Street, via a lift and cycle wheel ramp on the stairs. A total of 204 cycle spaces would be provided in accordance with Draft London Plan standards, with over 10% of spaces provided using a mix of Sheffield stands, half-height stands and ground fixings to accommodate non-standard/adapted bikes and encourage inclusive cycling.

<b>Land Use</b>	<b>Long-Stay Spaces</b>	<b>Short-Stay Spaces</b>	<b>Total</b>
Office	193	12	205
Hotel	10	4	14
Gym	1	16	17
<b>Total</b>	<b>204</b>	<b>32</b>	<b>236</b>

14.21 In accordance with the Draft London Plan minimum requirements, the development proposals would also be required to provide 32 short-stay cycle parking spaces. 38 spaces would be accommodated within the public realm, and within build-outs along Wicklow Street. Although the café/restaurant uses are considered ancillary to the hotel, this overprovision in addition to the eight existing Sheffield stands located on Swinton Street and Gray's Inn Road (providing an additional 16 spaces) would ensure that future users can park adequately at the Proposed Development.

### **Waste and Servicing – Policy**

14.22 Intend to Publish London Plan Policy S17 Reducing waste and supporting the circular economy seeks to reduce waste and increase material reuse, recycling and reduction in waste. Developments should be designed to have separate collection of dry recyclables and food.

14.23 Draft Policy T7 Deliveries, servicing and construction states proposals should facilitate safe, clean and efficient deliveries and servicing. Developments should provide adequate space for servicing, storage and deliveries should be made off-street. Construction Logistics Plans and Delivery and Servicing Plans are required.

### **Waste and Servicing – Assessment**

14.24 A service yard would be provided within the office footprint, located at ground floor level and accessed via a crossover from Swinton Street. This service yard would be shared between all commercial uses, providing flexibility and control over the timing of deliveries, frequency of commercial waste collections and types of vehicle used. Commercial waste collections would be undertaken by private contractors for office, hotel and gym uses.

14.25 The service yard can accommodate up to three vehicles at any one time comprising two vehicles up to 8m in length (e.g. 7.5T Box Van) and one vehicle up to 10m in length.

- 14.26 The redundant ambulance bay on Swinton Street would also be changed to a loading bay to accommodate any deliveries associated with residential uses, as well as residential refuse collection.
- 14.27 The requirements for waste storage have been calculated in accordance with Camden's Environment Service technical guidance for storage and collection of refuse and recycling.
- 14.28 Residential waste would be stored at ground floor bin stores within each block and collected on street from Wicklow Street and Swinton Street respectively. Bins would be presented in areas within 10m of the refuse vehicle on collection days in accordance with LBC requirements.
- 14.29 For communal waste storage facilities, Camden's guidance stipulates the conversions shown in Table 3.4 and Table 3.5 of the submitted transport assessment, this has been broken down for Block A and Block B. The calculations and storage requirements have been based on twice weekly collections
- 14.30 Camden's guidance stipulates that there is no accurate measurement of business waste as a conversion to square metres of floorspace. However, to forecast the likely storage requirements for non-residential uses, neighbouring Westminster City Council's latest guidance has been used for the calculations provided in Table 3.6 of the submitted transport assessment. Note that hotel includes the café/ restaurant land uses.
- 14.31 The bin store for the hotel would be located at B1 level. The bin store for the office and gym uses would be located at B2 level. Future occupiers and facilities management would be responsible for transferring the bins from each respective bin store to the service yard via the service lift ready for collection by private waste contractors.
- 14.32 Further details on the waste strategy, including waste storage and collection plans are contained within the DSP.

## Summary

14.33 The proposed development is considered to achieve strategic and local transport objectives through:

- New active frontages and the new public realm to the north, including enhanced natural surveillance and a new pedestrian routes between Wicklow Street and Swinton Street, and Gray's Inn Road and Wicklow Street.
- Significant increase in permeability throughout the site.
- High-quality short and long-stay cycle parking in accordance with the Draft London Plan and Camden Planning Guidance for Transport.
- Car free development, with the exception of disabled car parking spaces (three for residential, one for hotel and one for office).
- Managing deliveries and refuse collection to minimise their impacts upon other users.

14.34 Overall, it can be concluded that the proposed development is a sustainable scheme which supports the Healthy Streets Approach, Mayor's Transport Strategy, and Draft London Plan 2020. Furthermore, it would not have significant adverse impacts on the capacities or the safe operation of the surrounding transport networks.

## 15 Other Technical 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 WSP, 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 basement impact assessment shows that the level of impact to the existing geological and hydrogeological conditions, adjacent structures, slope stability and surface flow can be mitigated by appropriate design and standard construction practices.

### **Archaeology – Policy**

- 15.6 Paragraph 187 of the NPPF requires LPAs to identify and assess the significance of any heritage assets that may be affected. Paragraph 189 states that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, LPAs should require an appropriate desk-based assessment and, where necessary, a field evaluation.
- 15.7 London Plan Policy 7.8 Heritage Assets and Archaeology states new development should make provision for the protection of archaeological resources, landscapes and significant memorials. Physical assets should, where possible, be made available to the public on-site. In cases where this is not possible,
- 15.8 Intend to Publish London Plan Policy HC1 Heritage conservation and grown, part D states that development proposals should identify assets of archaeological significance and use this information to avoid harm of minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 15.9 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.

### **Archaeology – Assessment**

- 15.10 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.
- 15.11 This Desk-Based Assessment has established that the study site has a low potential for prehistoric, Roman, Saxon and medieval archaeology, and a high potential for post-medieval to modern remains. The assessment also concludes that any evidence



present may be only of local to negligible significance, and that any modern remains would also be of Negligible Significance.

- 15.12 Pre-Construct Archaeology Limited proposes to provide an archaeological watching brief during a forthcoming geotechnical Site Investigation to permit an early understanding of any archaeological potential encountered within the study site.

### **Noise – Policy**

- 15.13 The NPPF contains guidance on noise management in planning decisions. Paragraph 170 of the NPPF requires planning decisions to contribute and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of, among other things, noise.

- 15.14 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’.

- 15.15 Paragraph 182 of the NPPF states that:

**“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”**

- 15.16 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.

15.17 Draft Policy D12 Agent of Change of the London Plan places the responsibility for mitigating impacts from existing noise on the proposed new noise-sensitive development. New noise and nuisance-generating development proposed to noise sensitive uses should put measures in place to mitigate and manage any noise impacts. This can be achieved through:

1. Ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area.
2. Exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations.
3. Separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

15.18 London Plan policy D14 states that development proposals should manage noise by:

- avoiding significant adverse noise impacts on health and life;
- reflecting Agent of Change principle;
- mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses;
- improving and enhancing the acoustic environment and promoting appropriate soundscapes;
- promoting new technologies and improved practices to reduce noise at source.

15.19 At a local level, Policy A1 of the Local Plan seeks to manage the impact of development. The policy states that the Council will

- a) seek to ensure that the amenity of communities, occupiers and neighbours is protected

- b) seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities
  - c) resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
  - d) require mitigation measures where necessary.
- 15.20 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.
- 15.21 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.

### **Noise – Assessment**

- 15.22 The submitted Noise Impact Assessment (NIA), prepared by Hann Tucker Associates, assesses the potential noise impact of the proposed building services equipment. The assessment has considered the type and location of various plant items likely to be introduced and the location of noise sensitive receptors.
- 15.23 The application site is in close proximity to existing noise and other nuisance-generating uses as well as existing noise sensitive uses. It is noted that the application site adjoins the Water Rats public house and UCL Ear Institute, which contains specialist research facilities.
- 15.24 In accordance with Policy D13 'Agent of Change' of the Intend to Publish London Plan, the Agent of Change principle places the responsibility on the proposed development for mitigating impacts on the existing noise generating and noise sensitive activities.

- 15.25 This policy was introduced to protect existing uses from having unreasonable restrictions placed on them as a result of development permitted after the use was established.
- 15.26 The agent of change principle places an onus on the developer to secure suitable mitigation before the development has been completed.

### Construction

- 15.27 Whilst there would be disruption through the demolition and construction process, a construction management plan has been prepared to ensure that this is minimised.
- 15.28 Through ongoing discussions with UCL, the developer acknowledges that the Ear Institute has various areas which are sensitive to noise and vibration. A baseline noise and vibration survey has been undertaken to establish the criteria to be incorporated into the next stage design for the build adjacent to the Ear Institute, and to feed into the Construction Management Plan to mitigate the impact of the new development.
- 15.29 This initial baseline survey is part of a wider testing/monitoring regime agreed with UCL and is subject to further discussion and refinement.
- 15.30 In order to protect neighbouring uses through the construction period, as part of the planning submission Camden require a draft Construction Management Plan to be submitted. The CMP sets out a package of measures and practices that are required to manage the impact of a scheme's demolition, excavation and construction works. Developers are required to identify any potential negative impacts within the CMP and must set out the mitigation measures required.
- 15.31 A CMP would be secured as a planning obligation through a legal agreement, this requires the monitoring and review of the document, and meetings with key stakeholders. GW has provided and UCL has responded to a draft CMP and discussions continue between the Applicant and UCL regarding appropriate mitigation.
- 15.32 In addition to this, the Council could also request a demolition management plan if it were considered necessary to separate out the demolition and construction phases of a project.

### Operation

- 15.33 In designing the scheme, the architects have considered existing neighbouring uses (primarily the Water Rats pub), to ensure that sufficient mitigation measures form part of the design, in response to policy A4. It is not considered that the development would generate unacceptable noise and vibration impacts during operation.
- 15.34 The impact on the existing facilities around the site has been carefully considered to reflect the Agent of Change principle to ensure that established uses remain viable and can continue or grow without undue restrictions.
- 15.35 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. The assessment shows the site, subject to appropriate mitigation measures, is suitable for residential development in terms of noise.

### **Flooding, Drainage and SUDs**

- 15.36 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 15.37 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.
- 15.38 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.
- 15.39 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.

15.40 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.

15.41 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

15.42 The drainage strategy aims to reduce surface water discharge from the site to greenfield rates, and manage surface run off considering the impact of climate change in accordance with London Plan Policy 5.13 and Policy SI.13 of the Intend to Publish London Plan, and local policy CC2.

15.43 The proposed drainage strategy includes green roofs at high level and a concrete attenuation tank located below the basement slab. The surface water discharge would be restricted using a pump station located at B1 level, this will be restricted to the discharge rate agreed with the LLFA and TW, which is at a rate of 2.0 l/s for all storm events up to and including the 1:100 year + 40% climate change.

15.44 Furthermore, the strategy maximises opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in London Plan Policy 5.13 and Policy SI.13 of the Intend to Publish London Plan

15.45 As detailed in the Flood Risk Assessment submitted, the site is shown in the EA Flood Maps as being located within Flood Zone 1, which based on the NPPF, is classified as having a 'low' probability of tidal and fluvial flooding. Other potential sources of flooding have been investigated however no significant sources of flooding have been identified.

15.46 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.

## **Fire**

- 15.47 The Intend to Publish policy D12 of the London Plan requires that developments proposals must achieve the highest standards of fire safety. Part B of policy D12, states that the all major development proposals should be submitted with a Fire Statement produced by a third party suitable qualified assessor.
- 15.48 Part B(5) of the Intend to Publish London Plan Policy D5 requires that for all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 15.49 The development meets Fire Regulations, and both the means of escape for occupants, and accessibility for the Fire Brigade, has been carefully considered in the design of the proposed building.
- 15.50 The Fire Statement prepared by OFR consultants and submitted as part the application, summarises the fire strategy principles for the scheme. The fire strategy has been developed in accordance with the requirements of Building Regulations 2018. To comply with these requirements the recommendations of fire safety guidance, BS9999:2017, have been considered.
- 15.51 The Proposed Development is therefore considered to accord with Policy D12 and D5 of the Intend to Publish London Plan.

## **Land Contamination**

- 15.52 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**

- 15.53 As set out within the Preliminary Geo-Environmental Risk Assessment, prepared by WSP, the site setting is considered to be of a low to medium environmental sensitivity.

15.54 WSP have identified a LOW to MEDIUM risk of possible source-pathway-receptor pollutant linkages being present, which should be assessed further by undertaking an intrusive site investigation

### **Trees**

15.55 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.

15.56 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

15.57 As set out in the submitted Arboricultural Impact Assessment, one tree requires removal to permit development and one tree requires removal for health and safety reasons. The remaining trees would be retained as they have great amenity value and are visible throughout the surrounding area. The trees would have barriers and fencing around them whilst development takes place, and therefore accord with Local Plan Policy A3. Ground protection may be necessary to further protect RPAs.

### **Ecology**

15.58 The application is accompanied by a Preliminary Ecological Appraisal prepared by D F Clarke Bionomique Ltd. The report acknowledges that the site features two buildings with low bat potential and a tree with moderate bat potential. The tree and introduced shrubs onsite have potential to support nesting birds. The rest of the site does not



have the potential to support protected species. A bat report has also been submitted to provide recommendations for the protection of bats.

### **Microclimate**

15.59 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**

15.60 A high level assessment of the pedestrian level wind microclimate has been prepared by RWDI and submitted as part of the application. The note provides an overview of anticipated changes to the pedestrian wind microclimate around the Proposed Development and to outline areas where mitigation measures may need to be further developed. The need to carry out further assessment work after the grant of planning permission does not preclude the grant of planning permission at this stage.

15.61 A more detailed wind microclimate assessment to develop appropriate mitigation measures, such as landscape enhancements would be carried out post-planning stage.

## 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 October 2020. The CIL tariff for sites located within Central Camden (i.e. Zone A) are charged at the following rates:
- Office - £110 per sqm;
  - Hotel - £110 per sqm
  - Retail - £32 per sqm
  - Residential (10 or more dwellings) - £193 per sqm; and
  - Other commercial uses - £32 per sqm.

### **Developer Contributions**

- 16.10 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.

## 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 seeks to create an exemplary mixed-use development through the provision of high-quality architecture, public realm and landscaping, which encourage activity and permeability through the Site.
- 17.3 The new hotel and office buildings create a publicly accessible ground floor including café and restaurant spaces and the creation of new public routes through the site connecting Gray's Inn Road, Swinton Street and Wicklow Street.
- 17.4 The site is of strategic importance within the Knowledge Quarter and has the potential to deliver much needed affordable housing, affordable workspace and knowledge quarter uses with associated economic benefits for the local community.
- 17.5 The redevelopment proposals present a significant opportunity to extend the transformation of King's Cross to the south and east of the stations and to substantially improve the environment both physically and socially for those already living and working in the vicinity.
- 17.6 The proposed development will act as a catalyst for change in this area and seeks to contribute to improving the area with high quality architecture, and significantly improved public realm.
- 17.7 The proposed development will deliver the following benefits:

### **Environmental benefits**

- Targeting BREEAM Outstanding with a minimum commitment to BREEAM Excellent
- WELL and LEED accreditations
- Target to reduce on-site carbon emissions by at least 35%

- Mechanical ventilation to office with potential for mixed mode
- Natural planting incorporated into architecture 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
- New pedestrian connections through to a new public realm and Wicklow Street from both Swinton Street and Gray's Inn Road
- Creation of a new landscaped public space fully accessible to the general public
- Creation of a new landscaped private garden accessible to all residents of the new development
- Sustainable Urban Drainage
- The potential to engage with wildlife trusts and appropriate amenity societies to support their goals and initiatives
- Encourage sustainable transport options such as cycling and walking to reduce pollution from transport
- Retention and refurbishment of historic building (330 Grays Inn Road).

### **Social Benefits**

- Redevelopment of a large vacant site in single ownership in the heart of the Knowledge Quarter
- Creation of a new mixed-use destination which would act as a catalyst to the wider regeneration of the area
- 76 new private and affordable homes
- 50% affordable housing (on habitable rooms)
- 32 new affordable homes
- 190 sqm of dedicated children's playspace
- 748sqm of new, flexible affordable workspace
- New 182 bed hotel to support the growing Knowledge Quarter and add to character and activity of this location

- New café spaces and a restaurant for use by the general public within the new hotel and office building
- Active publicly accessible and engaging ground floor facilities within the hotel and office buildings
- New active frontages generating increased natural surveillance and contributing to a reduction in anti-social behaviour.

### **Economic Benefits**

- An average of 670 construction jobs per annum during the construction period first targeted at Camden residents and then via Central London First
- Approximately £2-£3.3m spent by construction workers in the surrounding area during the construction period which equates to £570k to £940k annually which would support surrounding local businesses
- Work placements and apprenticeships during the construction period.
- Over 1,230 gross direct on-site 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
- Work placements and apprenticeships made available in the hotel in connection with Westminster Kingsway College school of hospitality and culinary arts
- Promotion of the Camden STEAM Commission objectives amongst end users and occupiers
- Require living wage as a minimum salary for all local employees.
- Maximise the opportunities for local businesses to supply goods and services at the construction and end user phases
- Potential to contribute towards the ongoing success and development of the Knowledge Quarter through provision of lab-enabled space.

17.8 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.

17.9 The application accords with national, regional and local policy objectives to deliver sustainable, mixed-use and balanced communities and should therefore be approved.



