

Address:	King's Cross Methodist Church 58A Birkenhead Street London WC1H 8BW		3
Application Number:	2024/5792/P	Officer: Edward Hodgson	
Ward:	Kings Cross		
Date Received:	24/12/2024		
Proposal:	Part demolition, extension and reconfiguration of existing building, including enlargement of lower ground floor, erection of additional storey and new west wing and alterations to east elevation to provide replacement church (Class F1) with ancillary cafe and additional student accommodation (Sui Generis), together with associated plant, cycle and refuse storage		
Background Papers, Supporting Documents and Drawing Numbers:			
Existing Drawings:			
Site Location Plan PL050 PL01, PL099 PL01, PL100 PL01, PL101 PL01, PL102 PL01, PL103 PL01, PL111 PL01, PL112 PL01, PL113 PL01, PL114 PL01, PL121 PL01, PL122 PL01, PL123 PL01, PL124 PL01, PL125 PL01, PL126 PL01			
Proposed Drawings:			
(Demolition Plans) PL149 PL01, PL150 PL01, PL151 PL01, PL152 PL01, PL153 PL01, PL171 PL01, PL172 PL01, PL173 PL01, PL174 PL01, PL175 PL01, PL176 PL01, PL163 PL01, PL162 PL01, PL164 PL01, PL161 PL01,			
(Proposed Plans) PL199 PL01, PL200 PL01, PL201 PL01, PL202 PL01, PL203 PL01, PL204 PL01, PL211 PL01, PL212 PL01, PL213 PL01, PL214 PL01, PL221 PL01, PL222 PL01, PL223 PL01, PL224 PL01, PL231 PL01, PL232 PL01			
Documents:			
Design and Access Statement (Matthew Lloyd Dec 2024), Planning Statement (Pegasus Dec 2024), Ground Investigation and Basement Impact Assessment (GEA Sept 2024), Internal Daylight & Sunlight Report (DPR Nov 2024), Daylight & Sunlight Effects Report (DPR Oct 2024), Noise Impact Assessment for Proposed Student Accommodation (ACA Dec 2024), Energy Statement (Harley Haddow Nov 2024), Sustainability Statement (Harley Haddow Nov 2024), Transport Statement (i-Transport Dec 2024), HERITAGE & TOWNSCAPE STATEMENT (Revive & Tailor Dec 2024), Statement of Community Involvement (Pegasus Dec 2024), SuDS Strategy Report (Price and Myers Rev 2 Nov 2024), Acoustic Assessment of Proposed New Mechanical Services Equipment (ACA Dec 2024), Air Quality Assessment and Indoor Air Quality Plan (SRE Dec 2024), Fire Statement (Semper), Construction/Demolition Management Plan pro-forma			

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:	Agent:
West London Mission Circuit of The Methodist Church (WLM)	Pegasus Group 21 Ganton Street London W1F 9BN

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Sui Generis	Student Accommodation	806	1,371	565
F1(f)	Learning and non-residential institution (place of worship)	817	1,147	330
Total	All uses	1,623	2,518	895

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car – General	0	0	0
Car - Disabled accessible	0	0	0
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – student housing long stay	4	25	+21
Cycle – commercial long stay	0	3	+3
Cycle – short stay (all uses)	0	12	+12

EXECUTIVE SUMMARY

- i) The scheme would increase the provision of the existing church and community space and the number of student accommodation rooms by extending the existing building upwards on both street elevations. Although some demolition is proposed on the Crestfield Street side, the proposals would retain c. a significant proportion of the existing building and would improve the energy efficiency by providing PV panels and Air Source Heat Pumps and as a whole would help achieve carbon

reduction targets. A retention and extension approach is welcomed and in line with circular economy principles.

- ii) The additional student rooms would help meet the Council's student accommodation targets and the location for increased student accommodation is appropriate noting that the site is within the Knowledge Quarter and close to a number of universities within the Borough. The new rooms would be of a higher quality when compared to the existing and would provide an acceptable standard of student accommodation. A policy-compliant number of rooms would be secured as affordable student housing.
- iii) The extended church space would increase the provision of community facilities in the area. The church is well supported by a diverse congregation and provides charitable support to the local community through a number of initiatives within the Kings Cross Ward.
- iv) The proposal has been carefully designed to relate to the surrounding context, noting that the site is within the Kings Cross St Pancras Conservation Area and is located adjacent to Grade II listed buildings. No harm to any heritage assets would result from the proposal, including the host building as the Birkenhead Street elevation is a positive contributor to the Conservation Area. In addition, the scheme would not have a detrimental impact on neighbouring occupiers with regards to daylight/sunlight, basement impacts, noise and vibration. A Student Management Plan would be secured under a section 106 legal agreement.
- v) The scheme complies with the development plan as a whole and is recommended for approval.

OFFICER REPORT

Reason for Referral to Committee

Minor development where this involves the construction of either 5 or more five single dwelling houses or upwards of 500 sq. metres of non-residential floorspace [Clause 3(ii)].

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Conservation Area	Kings Cross St Pancras
PTAL (Public transport accessibility)	6b (excellent)
Underground development constraints and considerations	- Subterranean (groundwater) flow - Slope stability

Table 1 - Site designations and constraints

Description

1.2 The site occupies a plot which fronts onto two street elevations, namely Birkenhead Street and Crestfield Street and sits within the middle of both streets. The Birkenhead Street side of the building dates from between 1823-25 and comprises the chapel. The Crestfield Street side dates from the 1950s. Various unsympathetic additions to the building have been undertaken over the years including the removal of historic timber sash windows and replacements with less sympathetic ones.



Figure 1 – The existing site as viewed from Birkenhead Street



Figure 2 – The existing site as viewed from Crestfield Street

- 1.3 The existing building is currently in use as both a church (Class F1(f)) and student accommodation (Sui Generis) which is known as the Methodist Chaplaincy House. The Birkenhead Street side has 3 storeys plus a basement and the Crestfield Street side has 2 storeys. The portion of the building infilling between the two elevations is 3 storeys plus basement and a roof terrace. Lightwells are located on the north and south elevations to allow light into the basement. The building is predominantly finished in brick with timber windows.
- 1.4 The surrounding area is mixed in character, with some residential properties located to the south and east of the site, and commercial properties located to the north along Euston Road (which forms part of a primary frontage) and a hotel is located to the north of the site. Of note is Belgrove House, located opposite the site directly to the west, which at time of writing is being redeveloped. The new building at Belgrove House will be part 5 storey and part 10 storey, and the surrounding character along both Crestfield and Birkenhead Streets is largely 3 storeys with accommodation at roof level often in the form of mansard roof extensions.
- 1.5 The site is located within the Central London Area and immediately to the north is the King's Cross/Euston Road Central London frontage. It is also within the Kings Cross St Pancras Conservation Area. The Birkenhead Street elevation makes a positive contribution to the conservation area. Although the façade has been altered over the years, especially with the installation of less sympathetic windows, the façade's contribution derives from it being a transition between the historic residential terraces to the south and the busier commercial uses to the north along Euston Road, and by virtue of it being a non-domestic building.
- 1.6 The site has a Public Transport Accessibility Level (PTAL) rating of 6b (the best), and is close to King's Cross and St Pancras national rail, international and underground stations, as well as numerous bus services along Euston Road including numbers 30, 73, 91, 205, 390, N73, N91, N205.

2. THE PROPOSAL

- 2.1 The proposal is for the partial demolition and extension of the existing building. Specifically, the existing Crestfield Street portion of the building and some slabs and internal columns would be demolished. The rebuilt elevation at this side would extend up to 4 storeys, with a stepped roof form that decreases in height towards the neighbours either side to the north and south. In addition, the existing basement would be extended. The mid-section of the building would be 3.5 storeys, and the Birkenhead Street elevation would be extended up to 4 storeys. As with the Crestfield Street elevation, the roof line would be stepped up towards the centre. 75% of the existing building in terms of floorspace would be retained and 50% of the

existing structural columns and slabs and 55% of the existing external fabric would be retained.

- 2.2 The existing church will be re-provided and would be located at basement level and ground and first floors. This includes meeting rooms, ancillary café and office and admin space. In addition, the number of student rooms would increase from 22 to 33 (a net gain of 11 rooms), and the re-provided rooms would be of a higher standard than the existing, with ensembles and shared facilities including a communal living/dining/kitchen room, roof terrace and laundry room. This would be set across the first, second and third floors. 28 long stay and 12 short stay cycle parking spaces would be provided at basement level.

3. RELEVANT HISTORY

The site

- 3.1 **2015/7013/P** - Demolition and redevelopment to provide a replacement church with community facilities (Class D1), a replacement Methodist Chaplaincy House with 25 non-self contained student rooms (Sui Generis), and 11 residential self contained flats (Class C3) plus associated plant, cycle storage and refuse storage. **Refused – 26/07/2019**. (refused on the grounds of harm to the conservation area through demolition of a positive contributor, the bulk, height and scale of the new building harming the conservation area, impact on daylight, sunlight, outlook and sense of enclosure on neighbouring properties, poor quality proposed student accommodation through poor outlook and poor privacy, impact from basement excavation on neighbouring properties, failure to meet sustainability targets, insufficient air quality measures, and poor cycle parking).
- 3.2 **CTP/L14/9/A/27716** - Change of use of the first and second floors from a hostel and training centre to a hostel for full time students. **Granted – 05/05/1979**

The area

- 3.3 Belgrove House, Belgrove Street

2020/3881/P - Redevelopment of Belgrove House as a part 5 part 10 storey building plus 2 basement levels for use as office and research and laboratory floorspace; with café, flexible retail and office floorspace at ground floor; an auditorium at basement; incorporating step free entrance to Kings Cross Underground station in place of two entrance boxes along Euston Road; together with terraces at fourth and fifth floor levels, servicing, cycle storage and facilities, refuse storage and other ancillary and associated works. **Granted – 01/11/2021**.

4. CONSULTATION

Statutory consultees

Historic England

- 4.1 No comments.

Local groups

Bloomsbury CAAC

- 4.2 Objection covering the following issue(s):

- Excessive height, massing and poor design, which impacts upon the significance of the Bloomsbury Conservation Area and the adjoining Grade II listed building.
- Impact of plant and machinery on the occupants of neighbouring occupiers.

Officer response:

- *The proposal has been designed to consider its context, noting the nearby listed buildings and the conservation area. Design and heritage are discussed in section 9 of the report below.*
- *A noise impact assessment has been submitted and reviewed by the Council's Environmental Health officer who has deemed it to be adequate. Conditions are attached to the decision notice to ensure that mitigation measures are installed to prevent noise and vibration exceeding the Council's minimum standards. Amenity is discussed further in section 10 of the report.*

Adjoining occupiers

- 4.3 Four sites notice were displayed around the property on Crestfield Street, Birkenhead Street, Euston Road and St Chad's Street. The notices were displayed on 31/12/2024 until 24/01/2025 and the application was advertised in the local paper on 09/01/2025 (expiring 02/02/2025). A digital site notice was also displayed on the Council's website advertising the application.
- 4.4 One objection was received from a local household. The objections received by the Council are on the Council's website. The key issues raised are:

Design and Heritage

- The Birkenhead Street elevation is too large and domineering. The lack of railings will encourage anti-social behaviour.

Officer response:

- *The proposal has been designed to consider its context, noting the nearby listed buildings and the conservation area. Design and heritage are discussed in section 9 of the report below. Safety and Security is discussed in section 17 of the report.*

Amenity

- Loss of daylight, sunlight, overlooking, sense of enclosure, noise from plant equipment.

Officer response:

- *A daylight/sunlight impact assessment and a noise impact assessment have been submitted as part of the application. The existing situation includes mutual overlooking between the application site and no. 59 Birkenhead Street and this situation would not be significantly worsened by the development. Amenity is discussed further in section 10 of the report.*

Purpose of the development

- The development appears to go beyond serving the local community and seeks to serve the church commercially and wider London area.

Officer response:

- *Land use, including the provision of additional student accommodation and increased church provision is discussed in section 7 of the report.*

Basement

- The BIA is unclear, and it appears that the basement excavation would come up to the boundary wall. A basement application at the Vicarage was refused previously.

Officer response:

- *The BIA has been independently reviewed by the Council's Third-Party basement engineers and a copy of their audit is available to view on the Council's website. This application is assessed on its merits and decisions on neighbouring sites carry limited weight. The basement element is discussed in section 12 of the report.*

116 letters of support were received largely from members of the congregation. The letters state that the development will help ensure the future of the church which provides invaluable support to the congregation, and wider community through charitable endeavours.

5. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2024 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

[London Plan 2021 \(LP\)](#)

[GG1 Building strong and inclusive communities](#)

[GG2 Making the best use of land](#)

[GG6 Increasing efficiency and resilience](#)

[SD4 The Central Activities Zone \(CAZ\)](#)

[SD5 Offices, other strategic functions and residential development in the CAZ](#)

[SD10 Strategic and local regeneration](#)

[D1 London's form, character and capacity for growth](#)

[D2 Infrastructure requirements for sustainable densities](#)

[D3 Optimising site capacity through the design-led approach](#)

[D4 Delivering good design](#)

[D5 Inclusive design](#)

[D6 Housing quality and standards](#)

[D7 Accessible housing](#)

[D8 Public realm](#)

[D10 Basement development](#)

[D11 Safety, security and resilience to emergency](#)

[D12 Fire safety](#)

[D14 Noise](#)

[H15 Purpose-built student accommodation](#)

[HC1 Heritage conservation and growth](#)

[SI 1 Improving air quality](#)

[SI 2 Minimising greenhouse gas emissions](#)

[SI 3 Energy infrastructure](#)

[SI 4 Managing heat risk](#)

[SI 5 Water infrastructure](#)

[SI 6 Digital connectivity infrastructure](#)

[SI 7 Reducing waste and supporting the circular economy](#)

[SI 8 Waste capacity and net waste self-sufficiency](#)

[SI 12 Flood risk management](#)

[SI 13 Sustainable drainage](#)

[SI 17 Protecting and enhancing London's waterways](#)

[T1 Strategic approach to transport](#)

[T3 Transport capacity, connectivity and safeguarding](#)

[T4 Assessing and mitigating transport impacts](#)

[T5 Cycling](#)

[T6 Car parking](#)

[T6.5 Non-residential disabled persons parking](#)

[T7 Deliveries, servicing and construction](#)

[T9 Funding transport infrastructure through planning](#)

[DF1 Delivery of the Plan and Planning Obligations](#)

[M1 Monitoring](#)

[London Plan Guidance \(LPG\)](#)

[Accessible London SPG](#)

[Planning for Equality and Diversity in London SPG](#)

[Characterisation and Growth Strategy LPG](#)
[Optimising Site Capacity: A Design-led Approach LPG](#)
[Housing Design Standards LPG](#)
[Housing SPG](#)
[Social Infrastructure SPG](#)
[London's Foundations SPG](#)
[Urban greening factor LPG \(February 2023\)](#)
[Air quality positive LPG](#)
[Air quality neutral LPG](#)
[Be Seen energy monitoring LPG](#)
[Circular economy statements LPG](#)
[Energy Planning Guidance](#)
[The control of dust and emissions in construction SPG](#)
[Whole life carbon LPG](#)
[Sustainable Transport, Walking and Cycling](#)

Local policy and guidance

Camden Local Plan (2017) (CLP)

[Policy G1 Delivery and location of growth](#)
[Policy H9 Student housing](#)
[Policy C2 Community facilities](#)
[Policy C3 Cultural and leisure facilities](#)
[Policy C5 Safety and security](#)
[Policy C6 Access for all](#)
[Policy A1 Managing the impact of development](#)
[Policy A4 Noise and vibration](#)
[Policy A5 Basements](#)
[Policy D1 Design](#)
[Policy D2 Heritage](#)
[Policy CC1 Climate change mitigation](#)
[Policy CC2 Adapting to climate change](#)
[Policy CC3 Water and flooding](#)
[Policy CC4 Air quality](#)
[Policy CC5 Waste](#)
[Policy T1 Prioritising walking, cycling and public transport](#)
[Policy T2 Parking and car-free development](#)
[Policy T3 Transport infrastructure](#)
[Policy T4 Sustainable movement of goods and materials](#)
[Policy DM1 Delivery and monitoring](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Access for All CPG - March 2019](#)
[Air Quality - January 2021](#)
[Amenity - January 2021](#)
[Basements - January 2021](#)
[Community uses, leisure and pubs - January 2021](#)

[Design - January 2021](#)
[Developer Contribution CPG - March 2019](#)
[Energy efficiency and adaptation - January 2021](#)
[Student housing CPG - March 2019](#)
[Transport - January 2021](#)
[Water and flooding CPG - March 2019](#)

Other guidance:

Kings Cross St Pancras [Conservation Area Statement](#) (2003)

Draft Camden Local Plan

The council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for consultation (DCLP). The Camden Local Plan Proposed Submission Draft is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026). The consultation on the Proposed Submission DCLP closes on the 27 June 2025.

6. ASSESSMENT

6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Land use
8	Quality of proposed student housing
9	Design and Heritage
10	Impact on neighbouring amenity
11	Sustainability and energy
12	Basements
13	Water and Flooding
14	Transport
15	Trees, greening and biodiversity
16	Open Space
17	Safety and security
18	Air Quality
19	Employment and training opportunities

7. LAND USE

- 7.1 The proposal does not involve any change of use or the loss of any existing use but seeks to continue the existing uses on site. Both the student accommodation use (Sui Generis) and the church use (Class F1 (f)) would be extended in terms of floorspace.

Student Housing

- 7.2 Policy H9 of the Local Plan is relevant, and states that the Council will aim to ensure that there is a supply of student housing available at costs to meet the needs to students from a variety of backgrounds in order to support the growth of higher education institutions. The Council seeks an additional 160 places in student housing per year. Developments for student housing should:

- not involve the net loss of 2 or more self-contained homes,
- not prejudice the ability to deliver the target of self-contained homes,
- serves higher education institutions that are accessible,
- has an undertaking in place to provide housing for students at one or more specific institutions or otherwise provide a range of accommodation that is affordable to the student body as a whole,
- be accessible to transport, community facilities and other amenities,
- contribute to creating mixed, inclusive and sustainable community,
- and should not create a harmful concentration of uses in the local area and impact on nearby residential amenity.

- 7.3 The building currently provides 22 student places, and the development would add another 11 places which would help the Council to meet the annual target. The existing student accommodation is connected to the church, and all the students are studying across London rather than specifically at Camden-based institutions, however it is not a requirement for the students to be Christian. This use is well established and given the site's location within the Knowledge Quarter, and in close proximity to institutions within the borough such as UCL, UAL, Birkbeck and SOAS, intensifying the student housing use in this location is appropriate. The site is also very well located to nearby transport (with a PTAL rating of 6b), and close to the King's Cross Town Centre. There would be no loss of any self-contained residential units in Class C3 use. The student housing use is linked to the church which operates it. To be eligible, all students must be studying full-time at a university in London and provide proof of student status. The additional and re-provided rooms would operate in the same

way as the existing. It will continue to contribute to a mixed and sustainable community given the wide range of uses found in the vicinity. Although the King's Cross ward already has a reasonable amount of student accommodation, the additional spaces would not result in an unacceptable proliferation of students in the area, and for the above reasons, the location is considered to be appropriate and the overall uplift of 11 rooms is relatively modest.

- 7.4 In addition, 4 of the proposed rooms would be affordable which accounts for around 36%. Affordable student housing is defined in policy H15 of the London Plan as a bedroom that is provided at a rental cost for the academic year equal to or below 55% of the maximum income that a new full-time student studying in London and living away from home could receive from the government's maintenance loan or living costs for that academic year. Policy H15 of the London Plan states that for purpose-built student accommodation, if 35% of the development is affordable student housing, the scheme is eligible for the Fast Track route and no viability assessment is required at application stage. The affordable student housing would be secured via section 106 legal agreement.
- 7.5 Given the increase in the number of students, it is appropriate to secure a Student Management Plan via section 106 legal agreement to ensure that the intensified use does not impact adversely on the amenity of neighbouring occupiers and to ensure adequate management of the premises for the occupants.

Church

- 7.6 Policy C2 of the Local Plan is relevant and seeks to ensure that community facilities are developed and modernised to meet the changing needs of the community. The policy seeks to ensure that facilities provide access to a service on foot and by sustainable modes of transport, facilitate multi-purpose community facilities and secure the sharing or extended use of facilities that can be accessed by the wider community, and ensures that existing community facilities are retained recognising their benefit to the community, including protected groups.
- 7.7 The church has been on this site since at least 1825 and is attended by a large and varied congregation. Given the age of the building, the standard of the church is not up to modern requirements and is need of updating. The proposal would provide a high-quality and up-to-date church facility, with a larger hall and new café, meeting/community rooms. The site is well located with excellent access via public transport and the proposal would also provide cycle parking and would secure contributions to micromobility to encourage sustainable travel to the site.

- 7.8 It is noted that the church provides a range of community uses, not just for services of worship in English, Chinese and Mandarin, but also various charitable initiatives such as drop-in sessions for homeless and vulnerable people, support for gambling addicts and drop-in sessions for local female sex workers. The church is part of the Council of Camden Churches Cold Weather Shelter Homeless project and also provides a space for Alcoholics Anonymous and similar groups, Age Concern Camden, St Mungo's, history societies and deaf support groups amongst others. The proposal would therefore continue to provide these community and charitable facilities in a larger and higher quality space which is supported. The proposal would therefore support a number of protected groups.

8. QUALITY OF PROPOSED STUDENT HOUSING

- 8.1 Student housing is not assessed against the same standards as permanent self-contained residential; however, LP para 4.15.6 states that PBSA should provide adequate functional living space and layouts and be of high-quality design. CPG Student Housing requires student housing developments include a range of flat layouts including cluster flats, be designed to meet relevant standards and provide safe, secure, functional, adaptable and accessible spaces and support the health and wellbeing of students including the provision of community and leisure facilities and open space. Policy H9 of the Local Plan states that student housing should comply with any relevant standards for houses in multiple occupations (HMOs).

Design and layout

- 8.2 The proposed rooms would consist of a range of layouts, including 20 no. study bedrooms with ensembles, and 13 no. private studios, and one study room and one studio would be accessible. Communal facilities would include a large living/kitchen/dining room at third floor and a laundry room at first floor. All rooms would have access to the communal facilities. All rooms would meet the requirements of the benchmark space standards as set out in the Student Housing CPG in the table below (these benchmark values are based on Camden's HMO standards but add 1sqm for a desk/chair, 3sqm for kitchen facilities and 2.5sqm for a shower, WC and wash basin).

Configuration	Single room – benchmark area	Double room – benchmark area
Study bedroom with shower, WC and wash basin (without kitchen facilities or cohesive living)	12.5 sq m	14.5 sq m
Studio with kitchen facilities and shower, WC and wash basin	15.5 sq m	17.5 sq m
Study bedroom in cohesive living with shower, WC and wash basin (without kitchen facilities)	10.6 sq m	13.7 sq m

Table 2 – benchmark rooms spaces in the CPG Student Housing

The table below provides a schedule of the accommodation, indicating that all 33 proposed rooms would meet/exceed the benchmark figures outlined above.

SCHEDULE OF STUDENT ACCOMMODATION UNITS								
Unit No.	Floor	Type	Kitchenette provision	Wheelchair accessible	Bedspace	Area m ² (GIA)	CPG Student Housing Benchmark Area (m ²)*	% Variance
1-01	1	Single Study bedroom	No	Yes	1	28.5	10.6	169%
1-02	1	Single Study bedroom	No	No	1	16.7	10.6	58%
1-03	1	Twin Study bedroom	No	No	2	18.8	13.7	37%
1-04	1	Twin Study bedroom	No	No	2	21	13.7	53%
1-05	1	Single Study bedroom	No	No	1	12.5	10.6	18%
1-06	1	Single Study bedroom	No	No	1	12.5	10.6	18%
1-07	1	Single Study bedroom	No	No	1	12	10.6	13%
1-08	1	Twin Studio	Yes	No	2	23.3	17.5	33%
1-09	1	Single Studio	Yes	No	1	20	15.5	29%
1-10	1	Single Studio	Yes	No	1	19	15.5	23%
1-11	1	Single Studio	Yes	Yes	1	28.5	15.5	84%
1-12	1	Twin Study bedroom	No	No	2	24.5	13.7	79%
2-01	2	Single Studio	Yes	No	1	19.5	15.5	26%
2-02	2	Single Study bedroom	No	No	1	17	10.6	60%
2-03	2	Single Study bedroom	No	No	1	18.8	10.6	77%
2-04	2	Twin Study bedroom	No	No	2	19.5	13.7	42%
2-05	2	Twin Study bedroom	No	No	2	21	13.7	53%
2-06	2	Single Study bedroom	No	No	1	12.5	10.6	18%
2-07	2	Single Study bedroom	No	No	1	12.5	10.6	18%
2-08	2	Single Study bedroom	No	No	1	12	10.6	13%
2-09	2	Twin Studio	Yes	No	2	23.3	17.5	33%
2-10	2	Single Studio	Yes	No	1	20	15.5	29%
2-11	2	Single Studio	Yes	No	1	19	15.5	23%
2-12	2	Twin Study bedroom	No	No	2	24	13.7	75%
2-13	2	Single Studio	Yes	No	1	24.5	15.5	58%
2-14	2	Single Studio	Yes	No	1	21	15.5	35%
2-15	2	Single Studio	Yes	No	1	20	15.5	29%
2-16	2	Single Studio	Yes	No	1	20	15.5	29%
2-17	2	Single Studio	Yes	No	1	20	15.5	29%
3-01	3	Twin Study bedroom	No	No	2	22	13.7	61%
3-02	3	Single Study bedroom	No	No	1	18	10.6	70%
3-03	3	Single Study bedroom	No	No	1	17	10.6	60%
3-04	3	Twin Study bedroom	No	No	2	24.5	13.7	79%
TOTAL	33		13	2	43	643.4		

Table 3 – proposed student rooms sizes

It is also noted that of the existing 22 rooms, more than half do not meet these standards and so the proposal would have a marked improvement compared to the existing provision. All rooms would have adequate outlook.

8.3 Although there is no policy requirement for private amenity space, a communal terrace is proposed on the main roof at third floor level, with

seating, a pergola and planting. There would also be a smaller terrace to the front of the communal living/kitchen/diner facing onto Crestfield Street.

Noise and vibration

- 8.4 The new student rooms are in a central London location and close to a busy Town Centre, so there would be an expected level of noise and disturbance. However, adequate noise insulation has been recommended by the council's environmental health officer to comply with CLP policies A1 and A4, subject to conditions (condition 19).
- 8.5 Noise from plant within and on top of buildings would be conditioned in terms of noise levels, and there would be a requirement for anti-vibration mounts (conditions 12 and 15).
- 8.6 The student rooms will be constructed to a high standard that would ensure that the occupiers are not unduly impacted by noise from inside the block, or outside the building, in accordance with the development plan.

Dual aspect units

- 8.7 There is no policy requirement for student housing to be dual aspect, however, 5 of the proposed rooms would be dual aspect, approx. 15%, which is welcomed. Opportunities for additional rooms to be dual aspect were explored however this has proved to be challenging given the constraints of the site by virtue of it being a retention and redevelopment scheme compared to a completely new build.

Daylight and sunlight

Methodology

- 8.8 The internal daylight/sunlight report applies the relevant BRE guidelines to the proposed units. The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to make a balanced judgement.
- 8.9 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site if the resulting scheme would provide acceptable living standards.
- 8.10 The BRE guidance uses Climate Based Daylight Modelling (CBDM) to assess the light for proposed development. This methodology is a complex simulation of actual daylight levels but has targets that are generally more difficult to achieve in an urban context than older BRE guidelines.

- 8.11 The recommended CBDM methodology is based on the British Standard 'Daylight in Buildings' (BS EN17037). For daylight, the UK National Annex recommends the following median (average) illuminances should be exceeded for at least 50% of the room for at least half the daylight hours: 100 lux in bedrooms, 150 lux in living rooms, and 200 lux in kitchens. Between 150 lux and 200 lux can be used for combined living/kitchen/dining room. For sunlight, the guidance says a habitable room in the home (preferably the main living space) should receive at least 1.5 hours of sunlight.

Assessment

- 8.12 The results show that almost half (47%) of the 34 total student rooms will satisfy the 150 lux target. However, 71% of the rooms would meet a target of 100 lux, which is the target for bedrooms in self-contained residential units. It is also noted that the living/kitchen/diner at third floor would meet the target of 200 lux, and this is a space that is likely to be used communally by the students.
- 8.13 The sunlight results show that 12 (approx. 35%) of the 33 proposed bedrooms would meet the 1.5 hours of sunlight criteria. It is also noted that kitchen/living/diner would meet the 1.5 hours of sunlight criteria.
- 8.14 As set out within the BRE guidelines and the NPPF, daylight and sunlight availability are one of several considerations in site layout design. A balance between the various design factors needs to be made to ensure an overall high quality of housing. The living/kitchen/diner will receive adequate levels of daylight and sunlight which is likely to be used widely by the students. In addition, students will have access to the communal external terrace at third floor. This terrace would be south-east facing and is likely to receive decent levels of daylight and sunlight. It should also be noted that student housing is more transient in nature when compared to self-contained housing, given students spend less time in rooms and for limited times of the year and will also have access to communal facilities. The site is also located within a dense central London location and naturally limits the amount of daylight and sunlight available. Therefore, the shortfall in the number of rooms meeting the desired targets is accepted. Overall, whilst achieving this balance, the daylight and sunlight assessment results show a good level of compliance while ensuring the development makes optimal use of the potential for the site.

Accessible homes

- 8.15 The Student Housing CPG states that at least 5% of bedrooms in new student accommodation should be wheelchair accessible. 2 of the new bedrooms would be wheelchair accessible (approx. 6%) which exceeds this target.

- 8.16 A condition would be attached to secure the provision of the accessible and wheelchair dwellings (condition 16).

Conclusion

- 8.17 The proposed student rooms are considered acceptable in terms of aspect, outlook, noise, light, and amenity space and would provide an acceptable level of amenity. They would provide accessible homes for all, including provision of wheelchair units, allowing the buildings to house an inclusive community, including protected groups that can use them safely, easily and with dignity.

9. DESIGN AND HERITAGE

Designated and non-designated heritage assets

- 9.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.

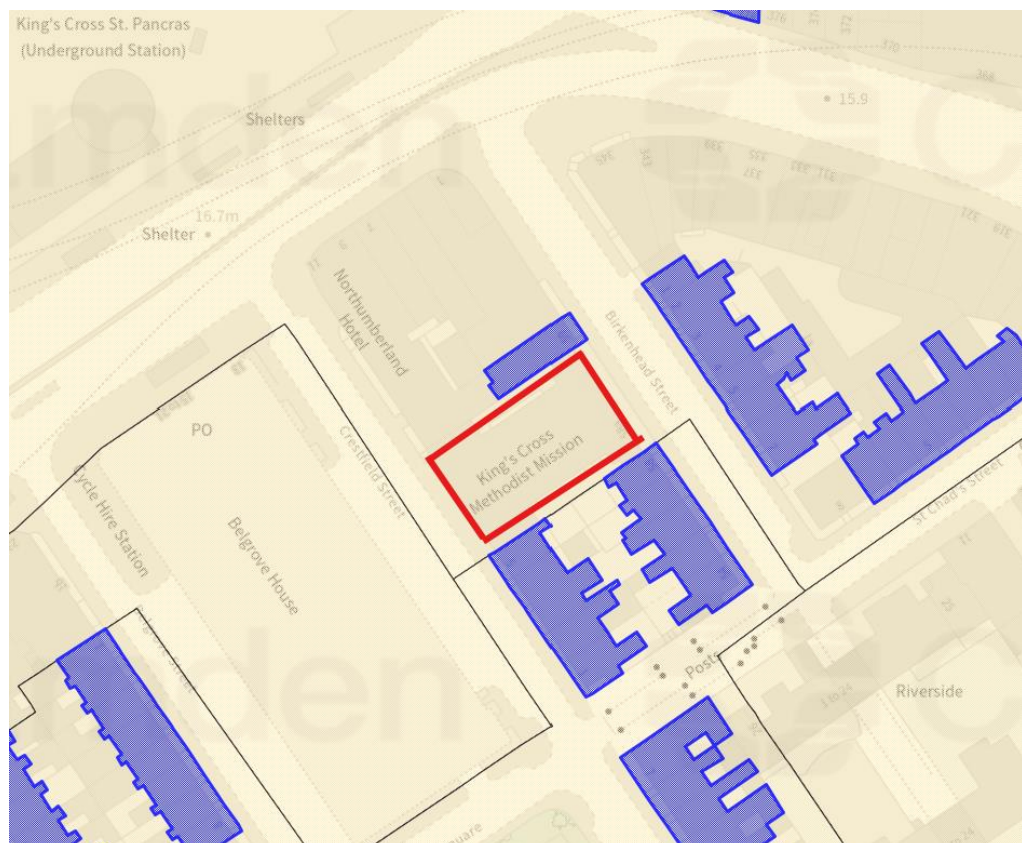


Figure 3 - Heritage map showing the conservation areas (shaded yellow) and nearby Grade II listed buildings (dark blue).

King's Cross St Pancras Conservation Area – no harm

- 9.2 The site is located within the King's Cross St Pancras Conservation, within sub area 3 'Euston Road'. This sub area comprises the south side of Euston Road and the adjoining streets and buildings that have a visual and/or physical connection to the main road. It is dominated by the railway stations on the north side. The common characteristics of the sub areas are a combination of land use, density of development, scale and style of buildings and period of development. The area's function is as a gateway to central London, although there is great variety in the character and appearance of the area as a whole.
- 9.3 The Birkenhead Street side of the application site makes a positive contribution to the character and appearance of the conservation area. It is described in the conservation area statement as being three storeys with a lower ground floor, with a central block of five bays and flanking wings, slightly set back. The ground floor has a dominant entrance with four pairs of timber doors, approached by wide stone steps. The front basement area has railings, and some timber sliding sashes remain, but many have been replaced with less sympathetic windows. This façade currently stands a storey lower than the surrounding houses, with the flanking side wings even lower. The side wings are set back from the building line, giving the building an awkward relationship with its taller neighbours which dominate it. The contribution to the conservation area comes from the building being a transition between the historic residential terraces to the south and the busier commercial uses to the north and by virtue of the building being a non-domestic building. The buildings on Crestfield Street are inconsistent in terms of height, materials and form, and the road is dominated by the highly decorated return of no. 11 Euston Road. The existing building on this side crouches awkwardly within a gap between its taller, more elegant neighbours.
- 9.4 On the Birkenhead Street side, it is proposed to add a stepped gable to this elevation, broadly mirroring the classic language of the host building. The additional height would start at the height of the flanking listed town houses, and will rise at the centre of the façade giving the building a prominence that is appropriate to its use and status. The set back side wings mean that the additional height will be somewhat offset, which will reduce its impact. The stepping gable is not necessarily contextual to the area, however, it would provide visual interest and reduces the bulk of the extension. The Georgian positive contributor host building will remain substantially unaltered.
- 9.5 On the Crestfield Street side, the proposal would replace a modern façade and although it would be taller than the existing, it is appropriate given the civic use of the building. In addition, the development at Belgrove House opposite, under construction at time of writing, will in future dominate this part of the conservation area. As such, a greater degree of design variance

is considered appropriate than might be demanded in more formally complete 19th century contexts.

- 9.6 The scale and massing, by virtue of the stepped gables on both sides, and given the context of the conservation area and the nature of the building's use, is acceptable and would preserve the character and appearance of the conservation area.

Bloomsbury Conservation Area – no harm

- 9.7 The Bloomsbury Conservation Area is located immediately to the south of the application site, with nos. 1-5 Crestfield St and nos. 54 to 58 Birkenhead Street located within the Bloomsbury CA.
- 9.8 The area nearest to the application site is sub area 13 'Cartwright Gardens/Argyle Square'. The interest of this sub area derives from the formal early 19th century street pattern and layout of open spaces and the relatively intact surviving terraces of houses.
- 9.9 As described above, the increasing massing and height has been sensitively designed with stepped gables on both elevations to create a softer appearance and relieves the bulk against the neighbouring terraces. Nonetheless, it is appropriate for a civic building of this nature to have greater prominence and stature. The Bloomsbury Conservation Area is also somewhat compromised by the six storey Riverside slab block of the Birkenhead Street Estate to the south on St Chad's Street. The proposal is not considered to detract from the street pattern, layout of open spaces or on the terraces which gives this sub area its significance. As such, it would preserve the character and appearance of the adjacent Bloomsbury Conservation Area.

59 Birkenhead Street – no harm

- 9.10 59 Birkenhead Street, including the railings to the front, is Grade II listed. Its significance derives from it being a well-preserved early to mid 19th century terraced house with a fine door surround and fanlight and ground floor window with matching arched surround.
- 9.11 Although the proposal would increase the height on the Birkenhead Street portion, the roof extension would be set back from the front elevation and would only marginally pop up above the height of the roof at no. 59 at the boundary. This would ensure that the extension would not dominate no. 59 and would still allow for the building to be read as a terraced property. As such, the proposal would not harm the significance of the listed building.

54-58 Birkenhead Street – no harm

- 9.12 Nos. 54-58 consecutive along Birkenhead Street including the railings to the front are Grade II listed. The terrace of five houses are similar to that at no.

59 and their significance derives from them being preserved examples of Georgian terraced houses, with fine details such as round-arched ground floor openings, slated mansard roofs, first floor windows in shallow arched recessed and cast-iron balconies.

- 9.13 As with no. 59, the scheme has been designed to soften the increased bulk and height against the neighbouring properties and the extension would be set back from the front elevation. The listed terrace would not be dominated and would remain legible. Its significance would not be harmed by the proposal.

1-5 Crestfield Street – no harm

- 9.14 As with nos. 54-58 Birkenhead Street to the east, these properties consist of 5 terraced houses built in the mid 19th century. Their significance is also based on them being preserved examples of 19th century townhouses, with fine detailing with arched doorways, fanlights, panelled doors, and first floor shallow arch recesses.
- 9.15 The proposed Crestfield Street elevation would be a complete rebuild and would be higher than the existing façade here. However, this elevation would also have a stepped gable, reducing in height as it nears the neighbouring properties. The height therefore at the boundary would only be marginally higher than no 5 Crestfield Street, and the proposal would not dominate the neighbouring buildings. It is also noted that Belgrove House is currently under construction which is significantly higher along Crestfield Street. As such, the proposal would not harm the significance of these listed buildings.

Urban Design

- 9.16 Policy D1 is relevant and requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of an area. Policy D2 seeks to preserve and enhance the various heritage assets of the borough.

Site context

- 9.17 The site is located within a quieter area of King's Cross, away from the busier areas around Euston Road and the stations. King's Cross has gone through major regeneration in recent years and is a key area within the Central Activity Zone and Knowledge Quarter. The site occupies a block with two street elevations and is largely surrounded by three storey Georgian terraced houses, although notably Belgrove House is currently under constructed which when completed will consist of a part 5 part 10 storey building facing onto Crestfield Street. Materials found within the

townscape consist mainly of stock brick and rendered façades and architectural detail typical of Georgian and Victorian styles.

- 9.18 The earliest building occupied the site by 1825 and featured a large non-conformist church which has been much altered over the years to accommodate a growing congregation. There is further need to expand the church thanks to a growing congregation and the wider needs of the community. The church is an important local community asset for church goers and the local community but is currently in need of upgrading, with tired interiors, poor quality student accommodation and poor circulation.
- 9.19 Churches are usually marked by special architectural features and expressions, which help signify their presence within the locality and sets them apart for other building types.

Scale and Massing

- 9.20 The original plot layout remains largely unaltered, apart from a slight increase to the rear of the existing cores on Birkenhead Street. The additional fourth storey takes the same 'H' shaped plan of the existing building below, only adding to the northeast and southwest section, minimising any sense of enclosure and increased overshadowing to gardens by keeping the middle section at three storeys. As the additional massing does not fill the entire plan, the massing is arranged to face the streets, filling the terrace to re-establish its prominence as a church building, whilst providing valuable amenity space. Furthermore, lightwells to the north and south of the plan are cleared of staircases to make them accessible garden areas. The scale complements the established character of the residential terraces and responds to the emerging townscape context of King's Cross as a major knowledge and transport hub that is characterised by high density, medium-high rise blocks, and quiet terraced streets. The proposal remains within the building line of the existing church, is not excessive in height, and uses contextual materials, and will not be harmful to the townscape. Onto Crestfield, the arrival of Belgrove House, will dominate the townscape. Notwithstanding the development at Belgrove House, the proposal would respect the domestic scale of the immediate neighbours through the stepped gabled which would soften the massing alongside the neighbouring properties.



Figure 4 - Proposed Birkenhead Street elevation



Figure 5 - Proposed Crestfield Street elevation

Detailed Design

9.21 The proposed stepped gable form is a modern reinterpretation of the original church pediment, and by the rising to the centre, the church regains its stature and presence within the street and therefore the community. The original church, as a non-conformist church, was influenced by classicism and Greek and Roman characteristics and the stepped gable can be traced back to Romanesque architecture, often still used in Christian architecture.

The proposed form is therefore a modern take on this idea and is appropriate for the building.

- 9.22 The Birkenhead Street elevation would be restored and retained, and the additional mass would sit behind the existing parapet allowing for a distinction between the new and old. Whilst the central opening of the addition aligns with the existing central bay, creating a focal point visually, the remaining openings are offset from the centre, creating a playful elevation. Opening sizes relate to the scale of that found on the existing and relate to sizes found on the adjacent listed terraces.
- 9.23 The Crestfield Street elevation at ground floor cuts in and angles to create a cruciform shape which is a subtle and elegant visual reminder of the building's use and again will enhance its prominence along the street, especially when compared to the existing façade here. The double height openings, and interplays with depth, planes, opening positions provide intrigue and drama across the elevation and will help draw people into the building. Horizontal expressions in pronounced sills, parapet lines and concrete lintels along with recessed brick panels, soldier coursing over openings, are all architectural features found within the townscape. The design utilises these details in the design, making for a contextualised response.
- 9.24 As there is not a strong consistency of materials to Crestfield, the brick does not match any colours but introduces a new colouring that still relates to existing materials through its mildness. A mid-tone speckled brick is proposed, aiming to compliment the prevailing stock brick within the Georgian terraces and the existing building, whilst adding further articulation, detail and difference to the architecture. Details of materials are secured by condition 5.
- 9.25 The existing front railings onto Birkenhead Street are considered to detract from the appearance of the building by creating a defensive feel that creates a barrier between the public realm. Details of the front boundary treatment here are secured by condition 7, noting that there are safety and security concerns regarding anti-social behaviour.
- 9.26 Overall, the proposal is a sensitive, sympathetic and well-designed civic building that will sit comfortably in this context and will help elevate the visual prominence of the building, while preserving the character and appearance of the conservation areas and listed buildings.

10. IMPACT ON NEIGHBOURING AMENITY

- 10.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook,

privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

Daylight and sunlight

- 10.2 A Daylight and Sunlight Report has been submitted as part of the application which details any impacts upon neighbouring properties.
- 10.3 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 10.4 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

- 10.5 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:
- **Vertical Sky Component (VSC)** – The daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
 - *The BRE considers daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.*
 - **No Sky Line (NSL)**, also known as **Daylight Distribution (DD)** – The daylight penetration into a room. It measures the area at desk level ("a working plane") inside a room that will have a direct view of the sky.
 - *The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
 - **Annual Probable Sunlight Hours (APSH)** - The amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
 - *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. If below this, impacts are noticeable if less than*

these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.

- **Sun-hours on Ground (SoG)**, also known as **Overshadowing** – The amount of direct sunlight received by open spaces.
 - *The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on 21 March (spring equinox), and the area which can receive some sun on 21 March is less than 0.8 times its former value.*
- 10.6 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.
- 10.7 Table F1 of the BRE guidance indicates suggested alternative VSC targets based on street width to building height ratios. For example, the ratio for the Birkenhead Street side is just over 1.6, which would equate to a retained VSC target of 23% and on Crestfield Street, this would equate to 22%.
- 10.8 The approach is supported by the London Plan. The LP Housing SPG states:

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

- 10.9 Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative negative impact on the VSC, and on the area receiving direct skylight. Where there are balconies which can cause obstruction, the BRE guidelines suggest modelling the impacts with and without the balconies. This allows you to test whether the presence of the balcony or overhanging walkway, rather than the size of the new obstruction (the proposed development), is the main factor in the relative loss of light.

Assessment

- 10.10 The daylight/sunlight report submitted indicates that 100% of all the windows at nearby residential properties tested would comply with the BRE guidance for daylight and sunlight, when tested using the BRE target the VSC, NSL and APSH. The neighbouring property at no. 59 Birkenhead

Street has amenity spaces at the rear at ground, first and third floor. The BRE guidance for Sun on Ground states that 50% of an amenity space should receive 2 hours of sunlight on 21st March. Currently, 0% of the spaces at ground and first floor receive 2 hours of sun on 21st March, with 13% of the third-floor space receiving 2 hours of sun. These figures would remain unchanged in the post-development scenario. The proposal therefore would not result in an adverse reduction of daylight and sunlight at neighbouring residential buildings including external amenity spaces.

Noise and Vibration

- 10.11 The proposal involves a range of plant equipment to be located at roof level. A Noise Impact Assessment has been submitted and reviewed by the Council's Environmental Health officer who deems it acceptable. Conditions 12 and 15 are attached to ensure that noise levels from the plant equipment would be in line with the Council's minimum standards, and that the proposed mitigation measures are installed prior to occupation.
- 10.12 The proposal would also retain the existing roof terrace at third floor, however it is noted that the number of students would increase compared to the existing situation. A student management plan would be secured under the section 106 legal agreement which would include controls of hours of use of the terrace. Currently the communal areas are quiet between 23:00 and 07:00 hours.

Overlooking

- 10.13 The proposal would involve an increase in the height of the building, however, the footprint, including the existing relationships between neighbouring buildings, would remain largely the same. There are numerous existing windows in situ that allow for mutual overlooking from the north and south elevations into the backs of neighbouring properties including the existing terraces. There would be little change in terms of the number and size of windows at upper floors on these elevations. The upper floors of both of these elevations are also set back from the north and south boundaries by approx. 3m. Although new doors are proposed at ground floor level to both the north and south lightwell gardens, these would be no higher than the existing window openings here, and there are sizeable boundary walls that limit views into properties. Although the level of the ground floor lightwells would be raised, this would only be marginal and would not significantly worsen views from the north and south lightwell gardens into neighbouring properties. There is an existing obscure glazed window that is located within the boundary wall between no. 59 Birkenhead Street which is understood to serve a bathroom. The terrace and open circulation space at third floor would be well set back from both the north and south elevations and would be behind planters and a parapet.

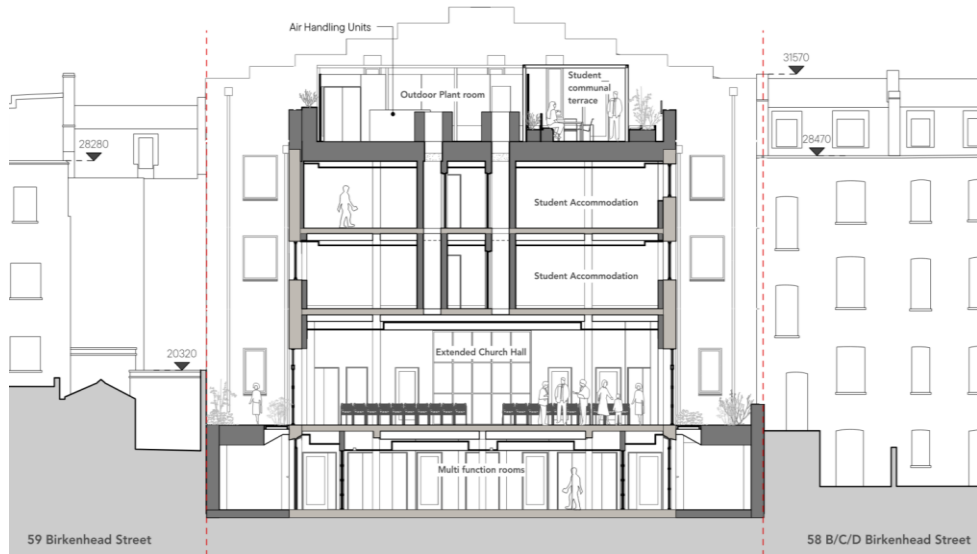


Figure 6 - Proposed section showing the relationship between the proposed lightwell gardens and roof terrace and the neighbouring properties

Sense of enclosure

10.14 The increase in bulk and massing is largely contained to the east and west portions of the building facing onto Birkenhead Street and Crestfield Street respectively. However, on both elevations, there would be an increase in massing towards the central area with the stepped gables. The roof additions on both elevations would only marginally project beyond the principle rear building lines of the neighbouring properties. This is acceptable and would not result in a sense of enclosure to the neighbouring properties given this modest projection as shown on the below proposed third floor plan with the darker grey indicating the depth of the roof extensions.

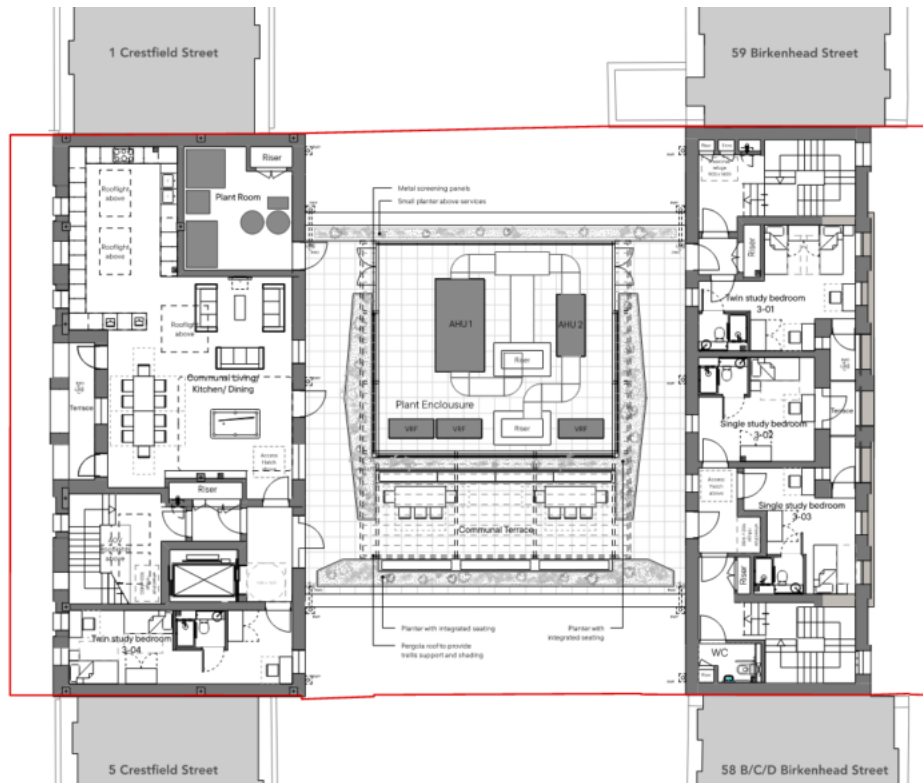


Figure 7 - Proposed third floor plan showing the relationship between the new roof extensions and the building line of neighbouring properties.

10.15 Overall, the scheme has been sensitively designed so as not to impact on neighbouring occupiers in terms of daylight, sunlight, privacy, sense of enclosure and noise.

11. SUSTAINABILITY AND ENERGY

11.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

11.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Redevelopment strategy

11.3 The proposal involves part demolition, extension and reconfiguration of the existing building. Rather than demolition of the entire existing building, only the western wing of the existing building would be developed, with the majority being retained, reconfigured and extended, which will notably

minimise waste generation from demolition works. Of the existing 1623m² of floorspace, 433m² is proposed to be demolished.

- 11.4 In the context of the application site as a whole, the proposal is not considered to amount to substantial demolition, noting that the majority of the existing floorspace would be retained. As such, the applicant is not required to provide a condition and feasibility study in order to justify demolition. The proposal would therefore follow core principles of sustainable development and circular economy.
- 11.5 To ensure greater resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use (condition 13).

Energy and carbon reductions

- 11.6 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2). The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).
- 11.7 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

Energy and carbon summary

- 11.8 The following summary table shows how the proposal performs against the policy targets for operational carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15% (non-residential)	35%
Be green stage (renewables): CLP policy CC1	20%	8%
Total carbon reduction: LP policy SI2 and LP CC1	35%	43%

Table 4 - Carbon saving targets (for majors) and the scheme results

- 11.9 The operational carbon savings and measures set out below will be secured under an Energy and Sustainability Strategy secured by Section 106 legal agreement which includes monitoring, in compliance with the development plan.

Total carbon reductions

- 11.10 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.
- 11.11 This is charged at £95/tonne CO₂/yr (over a 30-year period) which is 6.8 tonnes x £95 x 30 years = £19,360. This amount will be spent on delivery of carbon reduction measures in the borough.
- 11.12 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHP) for non-residential developments.
- 11.13 Residential development should be exceeding the target now, so GLA guidance has introduced a more challenging aspirational target of 50% on-site total savings that residential development should aim to achieve.
- 11.14 In this case, the development exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 43% below Part L requirements as shown in Table 3 above. The **carbon offset of £19,360 will be secured by Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 11.15 London Plan policy SI 2 sets a policy target of at least a 10% (residential) / 15% (non-residential) reduction through reduced energy demand at the first stage of the energy hierarchy.
- 11.16 In this case, the development exceeds the policy target of both 10% (residential) and 15% (non-residential), reducing emissions by 35% at this stage through energy efficient design, in compliance with the development plan. The proposals involve high performance insulation, low air permeability, efficient glazing, and addresses the requirements of the cooling hierarchy and overheating which can avoid the use of active cooling in the development. The proposal includes energy efficient measures like MVHR, high efficiency LED lighting with daylight dimming and occupancy sensors.

Be clean stage (decentralised energy supply)

11.17 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

11.18 In this case an assessment of the existing London heat map has been made and demonstrated that there are no existing local networks present within connectable range of the scheme / demonstrated that there are no existing local networks present within connectable range of the scheme.

Be green stage (renewables)

11.19 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.

11.20 In this case, the development does not meet the policy target of 20%, reducing emissions by 8% at this stage through renewables. Various options for other renewable energy sources were considered to improve this figure, such as Ground Source Heat Pumps, Micro Wind Power and Biomass, however, these were considered unfeasible. The proposal includes PV panels on the roof with full details secured by condition 6. These would be located on the south facing parts of the roof and the feasible amount of roof space given to PV panels has been maximised given the need for rooflights, and a lift-overrun, and also noting that north-facing PV panels would be less effective. Condition 6 will also secure a meter to monitor the energy output from the approved renewable energy systems. The proposal includes low carbon heating like Air Source Heat Pumps (ASHPs) which are proposed on the roof.

Be seen (energy monitoring)

11.21 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting. The proposal seeks to implement energy monitoring equipment.

11.22 The Energy and Sustainability Strategy secured by Section 106 legal agreement will secure reporting to the GLA in line with their published guidance.

Climate change adaption and sustainable design

11.23 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or

change of use, to meet BREEAM Excellent. The BREEAM pre-assessment seeks to achieve BREEAM Excellent with a targeted score of 72.36%. The sub-targets presented are 66% for energy, 75% for water, and 69% for materials credits, which meet the requirements.

- 11.24 The proposed development has considered and mitigated overheating by applying the cooling hierarchy. The location of the site neighbours listed buildings and is within a conservation area which has impacted the cooling hierarchy measurements proposed. The development is also limited due to external air quality, external noise, and safety of the student accommodation when determining the ventilation/overheating strategy.
- 11.25 Passive measures including the installation of LED-lighting, insulation to hot water pipework and minimisation of dead-legs to avoid standing heat losses from the pipework to the spaces, building fabric improvement, high performance and glazing and low g-value, window depth of 200mm to provide some local shading, windows are openable though natural ventilation cannot be relied on for thermal comfort, MVHR is proposed for the student accommodation (with the church portion having tempered air).
- 11.26 It has been demonstrated that the cooling hierarchy has been applied and that the use of active cooling has been minimised while providing thermal comfort for occupants. This is in line with CLP policy CC2.
- 11.27 In this case, the development incorporates planters, which would enhance the biodiversity of the site and reduce water runoff. Condition 16 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home. Flood risk is covered in the 'Flood risk and drainage' section of this report.

12. BASEMENTS

- 12.1 Camden Local Plan policy A5 seeks to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation and design terms.
- 12.2 The application involves the enlargement of the existing basement (referred to as lower ground floor on the plans). In particular, the existing lower ground floor would be extended under the Crestfield Street side of the building, with a front lightwell proposed here, and would also be extended to the north and south in the central portion of the building.
- 12.3 The application was accompanied by a Basement Impact Assessment authored by individuals with appropriate qualifications. An independent review was carried out by the Council's basement consultant (Campbell Reith) who reviewed the Basement Impact Assessment for potential impact

on land stability and local ground and surface water conditions arising from basement development. A condition is attached to require that the excavation be carried out in accordance with the recommendations in the BIA (condition 18).

- 12.4 Campbell Reith concludes that the BIAs are adequate and in accordance with the criteria laid out in policy A5 and guidance contained in CPG Basements. The proposed basement is considered acceptable, subject to the appointment of a suitably qualified engineer to oversee the works will be secured by condition.
- 12.5 Overall, the proposal complies with policy A5 of the 2017 Local Plan.

13. WATER AND FLOODING

- 13.1 Policy CC3 of the Local Plan is relevant and seeks to ensure that development does not increase flood risk and the reduces the risk of flooding where possible.
- 13.2 Although the site is not located within a flood risk area, it is located in close proximity to the course of the subterranean River Fleet. In addition, the both the ground floor and lower ground floor will potentially host many people and as such, a Flood Risk Emergency Plan is secured via condition (9) to ensure the safety of users.

14. TRANSPORT

- 14.1 Policies T1 and T2 of the CLP promote a move away from dependency on private motor vehicles, and a move to more sustainable modes of transport, supported by the right infrastructure and healthier environments.
- 14.2 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). King's Cross and St Pancras London Underground, National and International Rail stations are located approximately 100m north of the site and bus stops are located nearby on Euston Road. The site is accessible from the Strategic Cycle Network, with Cycleway C6 to the west on Judd Street providing access to St Pancras station. The nearest Santander cycle hire docking station is located on Birkenhead Street, adjacent to the property.

Trip Generation

- 14.3 The proposed development will result in an increase of 895sqm of floorspace, 330sqm of church floorspace and 565sqm of student accommodation floorspace, consisting of 11 new rooms.

The church has three weekly services which take place on Sundays:

- Mandarin service - 10:30
 - English service – 11:00
 - Cantonese service – 13:30
- 14.4 The Mandarin and Cantonese services are currently held in the church hall, accessed from Birkenhead Street, and the English services are held in the international services room, accessed from Crestfield Street.
- 14.5 The existing church hall and international services room have the capacity of 250 and 50 seats respectively. The proposal will result in additional 50 seats for the church hall and 30 seats for the international room, with the anticipated net increase in 24 and 15 visitors, based on a typical attendance ranging between 40%-50%.
- 14.6 The TRICS database was used to derive the anticipated student accommodation person trip rates, with the analysis showing a net increase in 15 trips. Multimodal trip profile was not provided for either land use, so it is not known how people travel to and from the site, however it can be assumed that based on other similar student accommodation developments, this particular land use results in the majority of trips being taken by public transport and active travel modes.
- 14.7 A multi-modal trip profile for the church use, however, is not so straightforward to define in absence of a travel survey. It is also not known what the church's catchment area is. Considering the fact that the services only take place on Sunday where there are no parking restrictions in operation, car travel to the site may increase and further exacerbate the existing very high parking stress levels. Although it is anticipated that the majority of journeys will be undertaken using public transport given the site's PTAL rating, some journeys may be made with cars, and so mitigation measures are proposed such as the CPZ review and Pedestrian, Cycling and Environmental contributions as outlined below to help alleviate additional parking stress and encourage more sustainable modes of transport.

Travel Planning

- 14.8 A Travel Plan is contained within the Transport Statement. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. However, the Travel Plan lacks the necessary details. CPG Transport provides guidance on how a Travel Plan should be structured. Modal share projections for walking and cycling will need to be set in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

- 14.9 A more detailed Travel Plan and associated monitoring and measures contribution of £11,348 would be secured via the section 106 legal agreement.

Access and Permeability

- 14.10 The principal pedestrian and also cycle access to the church will be from Birkenhead Street, featuring the stairs and a platform lift. Crestfield Street will provide access to the church café, student accommodation and cycle parking, chapel, office and bin store. A two-door lift (1.2m x 2.3m dimensions) will be installed and located adjacent to the student accommodation/ chapel/ office access. This will provide access for all users into the building which is acceptable. There is no motor vehicle access to the site.

Cycle Parking

- 14.11 The Council requires high quality cycle parking to be provided in accordance with Local Plan policy T1, London Plan policy T5 and the London Cycling Design Standards.

- For F1 Use, this should be 1 space per 8 full time employees (long stay), and 1 space for visitors per 100sqm (short stay)
- For student accommodation, this is 0.75 spaces per bedroom (long stay), and 1 space per 40 bedrooms (short stay).

- 14.12 25 long stay spaces for the student accommodation will be provided within a dedicated lower ground floor cycle parking store, accessed from Crestfield Street via a lift. Three long stay spaces for the church will be provided on the ground floor in a dedicated cycle parking area, accessed from Birkenhead Street.

- 14.13 12 short stay cycle parking spaces in the form of Sheffield stands will be provided on the ground floor at the Birkenhead Street frontage. Further details of the cycle parking are secured under condition 10.

Car Parking and vehicle access

- 14.14 The site is located in controlled parking zone CA-D (Kings Cross Area), which operates 08:30-18:30 Monday to Friday, and 08:30-13:30 on Saturday. The development would be car free and this would be secured via section 106 legal agreement.

- 14.15 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '*...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.*' Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: '*All proposals should include an appropriate amount*

of Blue Badge parking, providing at least one space even if no general parking is provided.

- 14.16 Therefore, it is considered appropriate to seek an off-site contribution of £4,000 for a disabled parking space to be provided on the public highway in a suitable location within 50m from the site.

CPZ (controlled parking zone) Review

- 14.17 Objective 2 of the Camden Transport Strategy sets out to reduce car ownership and use, and motor traffic levels in Camden, and features several measures in support of achieving this objective. One of the measures is 2d, which states that the Council will *‘undertake a study to provide a robust evidence base using all relevant data and local context to identify where amendments to Controlled Parking Zone (CPZ) hours of control or size will have an impact on car ownership and car use, and use that study to help guide future reviews and decisions.’*

- 14.18 In alignment with that action, Camden’s Controlled Parking Zones (CPZ) Review final report, which was published in February 2023, independently appraised all of Camden CPZs using a multi-criteria assessment. The findings show that there is a greater need to manage parking demand in the borough through the hours of CPZ controls. The CPZ Assessment Results show that CA-D CPZ (in which the site is located) performed relatively poorly in terms of the impact of its current hours of control in helping manage demand, and was attributed a “Red” RAG status, which present the greatest need and/or justification for increasing the regulation parking. The review recommends, amongst others, that the CA-D hours of operation are extended subject to consultation and decision-making processes.

- 14.19 At present, the CA-D CPZ control hours do not extend into the evening, nor do they cover much of the weekend, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This has a potential to increase on-street parking pressure which may drive demand for CPZ reviews. Considering the increase in Sunday service attendance and the location of the proposed development, it is appropriate to request a contribution of £30,000 towards the CA-D CPZ review, which is likely to take place in 2025-2028.

Construction Management

- 14.20 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft Construction/Demolition Management Plan using the Council’s CMP pro-forma is provided in support of the planning application. A more detailed

CMP document will then be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

14.21 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.

14.22 Implementation support contributions of £10,116 and impact bonds of £16,000 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1. A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by legal agreement if planning permission is granted.

Deliveries and Servicing

14.23 Deliveries and servicing would be carried out in a similar manner to the existing and the proposal is unlikely to create significant increases in deliveries.

Highways Works

14.24 The proposed development will require extensive demolition and construction works which may cause damage to the public highway. A highways contribution of £20,000 would be secured by legal agreement. This is a standard request applicable to all developments where construction works might result in repairs required to public highway.

Pedestrian, cycling and environmental improvements (PCE)

14.25 Securing financial planning obligations from developments towards transport improvement schemes is necessary when it is considered that a development will have significant impacts on the local area which cannot be mitigated by planning conditions. New developments place pressure on the existing infrastructure and services and benefit directly from new and improved safe and healthy street schemes we are delivering across the borough, as well as complementary initiatives (such as cycle training – covered through Travel Plan contributions). The delivery of these Safe & Healthy Streets schemes is based on our ambitious Camden Transport Strategy Delivery Plan for 2025 - 2028, in which developer contributions have been identified as a source of funding.

14.26 In line with the increase in walking and cycle trips generated by the proposed development and further promoted by the requested Travel Plan, we will seek a financial contribution of £30,000 towards public realm

improvement in the local area which would be secured by section 106 legal agreement.

Micro and shared mobility improvements

- 14.27 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area.
- 14.28 The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays, car club bays, and electric vehicle bays in the area. Considering the STAL grades and the demand arising for this transport mode from the proposal, it is appropriate that additional bays are provided in the future via developer contributions.
- 14.29 A cycle/e-scooter hire improvements contribution of £5,000 would therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.
- 14.30 Overall, the scheme is acceptable in transport terms and will contribute to the Council's wider transport strategies, subject to conditions and financial contributions secured via section 106 legal agreement.

15. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

- 15.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation.
- 15.2 The site currently does not benefit from any greening or trees. The proposal would include planters within the garden lightwells to the north and south elevations at ground floor, as well as planters around the communal roof terrace at third floor. Therefore, the proposal would result in an overall improvement in terms of planting and biodiversity.
- 15.3 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan.

Statutory Biodiversity Net Gain

- 15.4 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 15.5 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.
- 15.6 This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits.
- 15.7 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this scheme will not require the approval of a BGP because it is below the *de minimis* threshold. This is because it does not impact an onsite priority habitat and impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat.

16. OPEN SPACE

- 16.1 Policy A2 of the Local Plan is relevant, as is CPG Public Open Space. Para 1.6 of the CPG states that student housing schemes creating an additional 11 or more units/rooms, will need to make a contribution to the provision of open space and play facilities in the borough.
- 16.2 A payment-in-lieu for a contribution for open space is calculated as **£41,580** and is secured via section 106 legal agreement.

17. SAFETY AND SECURITY

- 17.1 Policy C5 of the Local Plan and CPG Design are relevant with regards to the secure by design. Policy C5 requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime.
- 17.2 It is noted that given its location, the site does attract some anti-social behaviour which is why the railings and gate were installed on the Birkenhead Street elevation some time ago. Condition 7 therefore secures details of the front boundary treatment onto Birkenhead Street, so that a suitable design solution can be found to reduce the risk of crime at the site

while also preserving the character and appearance of the conservation area and nearby listed buildings. It is envisaged that a softer and less defensive treatment could be achieved perhaps with incorporation of planting. An informative is also attached reminding the applicant to consult with the Metropolitan Police's Designing Out Crime Officer to ensure that relevant safety and security measures are put in place.

18. AIR QUALITY

- 18.1 CLP policy CC4 seeks to ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough. Given the development would add additional sensitive uses and has the potential to have an adverse impact on local air quality, a detailed Air Quality Assessment (AQA) has been submitted as part of the application and assessed by the Council's Air Quality Officer.

Construction impact of development on local area

- 18.2 The AQA demonstrates that the construction dust risk from the proposed work is medium, including from the proposed demolition works to the Crestfield elevation. As such, condition 3 requires 2 dust monitors to be installed for 3 months in advance and through the works. In addition, the Construction Management Plan secured under the section 106 legal agreement would help manage dust and pollution during construction. Any Non-Road Mobile Machinery (NRMM) used on site for the construction will need to comply with the latest engine requirements via condition 13.

Impact on Local Area

- 18.3 The development proposes air source heat pumps, and no combustion heating is to be used. There is no car parking proposed, and no generators are proposed. The proposed development is air quality neutral.

Impacts on occupants

- 18.4 The proposed student accommodation is located at first floor and above. The submitted modelling shows that this is suitable for residential use. The proposal incorporates mechanical ventilation to improve air quality for future occupants. Condition 8 will require details of air inlet locations to be submitted for approval.

19. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 19.1 The proposed development would be likely to generate increased employment opportunities during the construction phase as it is more than 1,000sqm or £3mill construction costs. To ensure local people benefit from

these opportunities in line with CLP policy E1, the Economic Development Team will work with the developer to deliver several benefits from the development.

During construction

- **Apprenticeships** - the applicant will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the council's Euston Skills Centre (moved to a new location hence a new name). With an estimated build cost of £25 million, this would mean 8 construction apprentices and a £13,600 support fee.
 - **Local Recruitment** - the applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than a week before the roles are advertised more widely.
 - **Local Procurement** - the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area. The Economic Development Team will liaise and assist with the developer to provide details of local suppliers and subcontractors.
- 19.2 The above measures would be included in a package of **Employment and Training measures secured by s106 agreement** in accordance with CLP policy E1 and the CPG.

20. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 20.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team. The CIL in this instance is only applied to the student housing as according to the Council's charging schedule, community meeting spaces are not liable. The charging rate for student housing in Zone A (central) is £225 per sqm. The amount required is therefore calculated as 565sqm x £225 per sqm = £127,125.

21. CONCLUSION

- 21.1 The proposal would result in a sensitively-design, high quality and contextual development that would contribute to the Council's student housing accommodation and to community facilities in the borough. It would facilitate the charitable endeavours that the Church carries out within Kings

Cross but providing larger and high-quality community spaces. The majority of the existing building would be retained and extended, and sustainable design measures would be incorporated to meet climate change mitigation measures.

Public benefits

21.2 No harm has been identified to heritage assets but if the committee decides there is harm, there are a number of public benefits that could weigh against that harm.

- Additional community floorspace
- Affordable student housing
- Contributions to pedestrian, cycling and environmental infrastructure
- Contributions to controlled car parking review
- Car free development and additional cycle parking
- Retention and remodelling of a positively contributing building
- Contributions to local open spaces
- Construction apprenticeships

22. RECOMMENDATION

22.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- Construction management plan (CMP)
- CMP implementation support contribution of £10,116
- CMP Impact Bond of £16,000
- Construction Working Group
- Car free
- Pedestrian, cycling and environment contribution of £30,000
- Travel Plan with monitoring and measures contribution £11,348
- Controlled Parking Zone Review of £30,000
- Disabled parking bay of £4,000
- Highways contribution of £20,000
- Micromobility contribution of £5,000
- Open Space contribution of £41,580
- Carbon Offset Payment of £19,360
- Student Management Plan including hours of use of terrace
- Affordable Student Accommodation
- 8 Construction Apprenticeships and support fee of £13,600
- Local recruitment and procurement

23. LEGAL COMMENTS

- 23.1 Members are referred to the note from the Legal Division at the start of the Agenda.

24. CONDITIONS

Standard conditions

1 Time limit

The development hereby permitted must be begun not later than three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2 Approved drawings

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Site Location Plan PL050 PL01, PL099 PL01, PL100 PL01, PL101 PL01, PL102 PL01, PL103 PL01, PL111 PL01, PL112 PL01, PL113 PL01, PL114 PL01, PL121 PL01, PL122 PL01, PL123 PL01, PL124 PL01, PL125 PL01, PL126 PL01

(Demolition Plans) PL149 PL01, PL150 PL01, PL151 PL01, PL152 PL01, PL153 PL01, PL171 PL01, PL172 PL01, PL173 PL01, PL174 PL01, PL175 PL01, PL176 PL01, PL163 PL01, PL162 PL01, PL164 PL01, PL161 PL01,

(Proposed Plans) PL199 PL01, PL200 PL01, PL201 PL01, PL202 PL01, PL203 PL01, PL204 PL01, PL211 PL01, PL212 PL01, PL213 PL01, PL214 PL01, PL221 PL01, PL222 PL01, PL223 PL01, PL224 PL01, PL231 PL01, PL232 PL01

Documents:

Design and Access Statement (Matthew Lloyd Dec 2024), Planning Statement (Pegasus Dec 2024), Ground Investigation and Basement Impact Assessment (GEA Sept 2024), Internal Daylight & Sunlight Report (DPR Nov 2024), Daylight & Sunlight Effects Report (DPR Oct 2024), Noise Impact Assessment for Proposed Student Accommodation (ACA Dec 2024), Energy Statement (Harley Haddow Nov 2024), Sustainability Statement (Harley Haddow Nov 2024), Transport Statement (i-Transport Dec 2024), HERITAGE & TOWNSCAPE STATEMENT (Revive & Tailor Dec 2024), Statement of Community Involvement (Pegasus Dec 2024), SuDS Strategy Report (Price and Myers Rev 2 Nov 2024), Acoustic Assessment of Proposed New Mechanical Services Equipment (ACA Dec

2024), Air Quality Assessment and Indoor Air Quality Plan (SRE Dec 2024), Fire Statement (Semper) Construction/Demolition Management Plan pro-forma

Reason: For the avoidance of doubt and in the interest of proper planning.

Pre-start conditions (any works)

3 Air Quality Monitoring

No demolition or development shall commence until all the following have been complied with:

- a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;
- b) A confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details; and
- c) Prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.

The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.

Reason: Development must not commence before this condition is discharged to manage and mitigate the impact of the development on the air quality and dust emissions in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policies A1, A4 and CC4 of the Camden Local Plan 2017 and policy SI1 of the London Plan.

4 Basement Engineer's Qualifications

The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, check for compliance with the design (as approved by the local planning authority and building control body) and monitor the critical elements of both permanent and temporary basement construction works throughout their duration. Details of the appointment and the appointee's responsibilities shall be submitted to and

approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017

Pre-start conditions (other than demolition or site clearance)

5 Detailed design drawings and samples

Prior to commencement of works (other than demolition and site clearance), detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

a) Detailed drawings including plans, coloured elevations and sections of all windows (including jambs, head and cill), external doors, screening, balconies, balustrades, parapets, planters and associated elements at a scale of 1:20;

b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Sample bay panel of materials to be provided at a suitable size (provided on site / at agreed location for review) to include typical window with all neighbouring materials and details;

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017

6 PV Panels

Prior to commencement of above ground works, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells / energy generation capacity and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved

renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.

7 Front Boundary

Prior to the commencement of the relevant part of the works, full details of the front boundary treatment to Birkenhead Street shall have been submitted to and approved by the local planning authority in writing.

Reason: In the interests of the visual amenity in accordance with policies D1, D2 and C5 of the Camden Local Plan 2017.

8 Air Inlet Locations

Prior to commencement of above-ground works, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads and the boiler/ CHP stack or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.

9 Flood Risk Plan

Prior to commencement of above ground works a Flood Risk Emergency Plan should be prepared in accordance with the aims and objectives of the ADEPT/Environment Agency Flood Risk Emergency Plans for New

Development guidance and submitted to the Local Planning Authority and approved in writing.

Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan.

10 Cycle Parking

Before the development commences, details of secure cycle storage area for 40 cycles shall be submitted to and approved by the local planning authority. The approved facility shall thereafter be provided in its entirety prior to the first occupation, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

Prior to occupation or use

11 Waste and refuse storage

The refuse and recycling facility as approved shall be provided prior to the first occupation of any of the new homes and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.

12 Plant Noise mitigation

Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017

Diversion away from landfill

13 The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials

to enable their reuse off-site. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.

Compliance conditions

14 Non-road mobile machinery (NRMM)

No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.

15 Noise limits for plant

The external noise level emitted from plant, machinery or equipment at the development, with any specified noise mitigation hereby approved, shall be lower than the typical existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and surrounding properties is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

16 Water Use

The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, with an additional 5 litres/person/day for external water use.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

17 Wheelchair accessible units

The following dwellings shown labelled on the approved floorplans shall be constructed as Wheelchair Adaptable Dwellings to comply with Part M4(3) of the Building Regulations:

Units 1-11 and 1-01

All other dwellings hereby permitted shall be constructed to comply with Part M4(2) of the Building Regulations.

Reason: To secure appropriate access for disabled people, older people, and others with mobility constraints, in accordance with policies H6 and C6 of the Camden Local Plan 2017.

18 BIA Compliance

The development shall not be carried out other than in strict accordance with the methodologies, recommendations and requirements of the Basement Impact Assessment Rev 4 dated April 2025 and the Audit dated May 2025 hereby approved, and the confirmation at the detailed design stage that the damage impact assessment would be limited to Burland Category 1.

Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.

19 Internal Noise Levels

The design and structure of the development shall be of such a standard that it will protect residents within it from existing external noise so that they are not exposed to levels indoors of more than 35 dB LAeq 16 hrs daytime and of more than 30 dB LAeq 8 hrs in bedrooms at night.

Reason: To ensure that the amenities of future occupiers are protected in accordance with policies A1 and A4 of London Borough Camden Local Plan 2017.

20 No additional external fixtures

Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 or any subsequent or superseding orders, no lights, meter boxes, flues, vents or pipes, and no telecommunications

equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the building, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.

25. INFORMATIVES

1	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
2	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
3	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
4	<p>Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.</p>
5	<p>You are reminded of the need to provide adequate space for internal and external storage for waste and recyclables. For further information contact Council's Environment Services (Waste) on 020 7974 6914/5 or see the website http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en.</p>

6	<p>The Health and Safety Executive (HSE) states that work-related stress and poor mental health should be treated with the same significance as risks of poor physical health and injury. The Council views this as particularly pertinent to the construction industry, a predominantly male environment where the risk of suicide is around 3.5 times higher than men in general. Approximately one-third of construction workers report increased levels of anxiety every day. The Council strongly encourages developers of major construction sites to sign up to one of two construction industry led initiatives, Building Mental Health (Building Mental Health - Home) or Mates in Mind (Home Page), train a proportionate number of staff in Mental Health First Aid, and offer drop-in sessions/or spaces at construction sites for workers.</p> <p>The Council will support the construction industry working in Camden with an offer of free Mental Health First Aid and other training, and information on local resources and signposting to sources of help.</p>
7	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
8	<p>Biodiversity Net Gain (BNG) Informative (1/2):</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 (“1990 Act”) is that planning permission granted in England is subject to the condition (“the biodiversity gain condition”) that development may not begin unless:</p> <ul style="list-style-type: none"> (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan. <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this will not require the approval of a BGP before development is begun because it is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).</p>

++ Summary of transitional arrangements and exemptions for biodiversity gain condition

The following are provided for information and may not apply to this permission:

1. The planning application was made before 12 February 2024.
2. The planning permission is retrospective.
3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.
4. The permission is exempt because of one or more of the reasons below:
 - It is not “major development” and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.
 - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).
 - The application is a Householder Application.
 - It is for development of a “Biodiversity Gain Site”.
 - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding).
 - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2)

9

Biodiversity Net Gain (BNG) Informative (2/2):

+ Irreplaceable habitat:

If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.

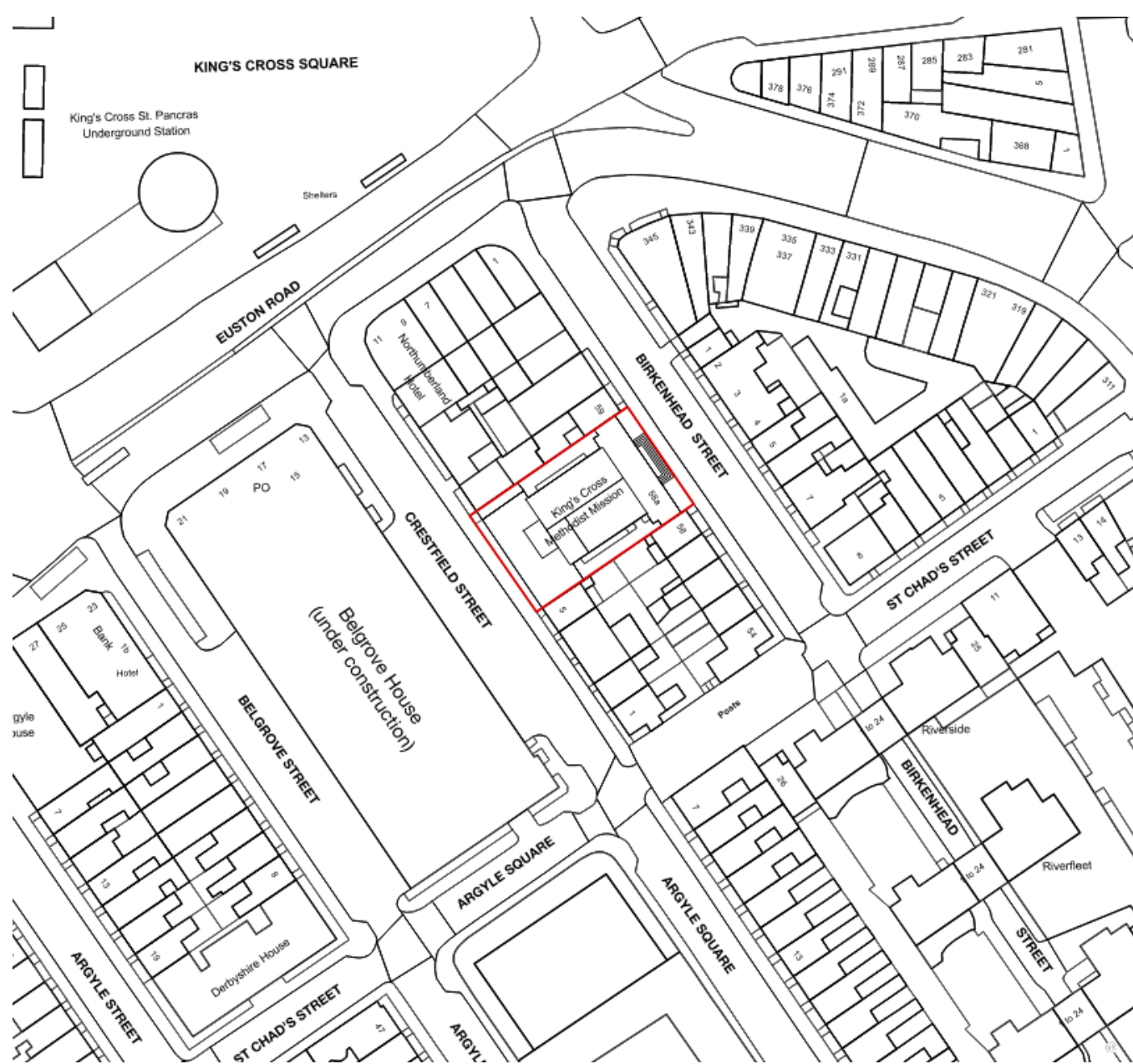
	<p>++ The effect of section 73(2D) of the Town and Country Planning Act 1990</p> <p>If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission (“the earlier BGP”), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>++ Phased development</p> <p>In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024</p>
10	<p>The applicant is advised to consult with the Designing Out Crime Office of the Metropolitan Police to ensure adequate security and safety measures are provided as part of the development hereby approved. The following link gives advice on what can be achieved - https://www.securebydesign.com/images/COMMERCIAL_GUIDE_2023_web.pdf.</p>

Planning Committee

5 June 2025

2024/5792/P

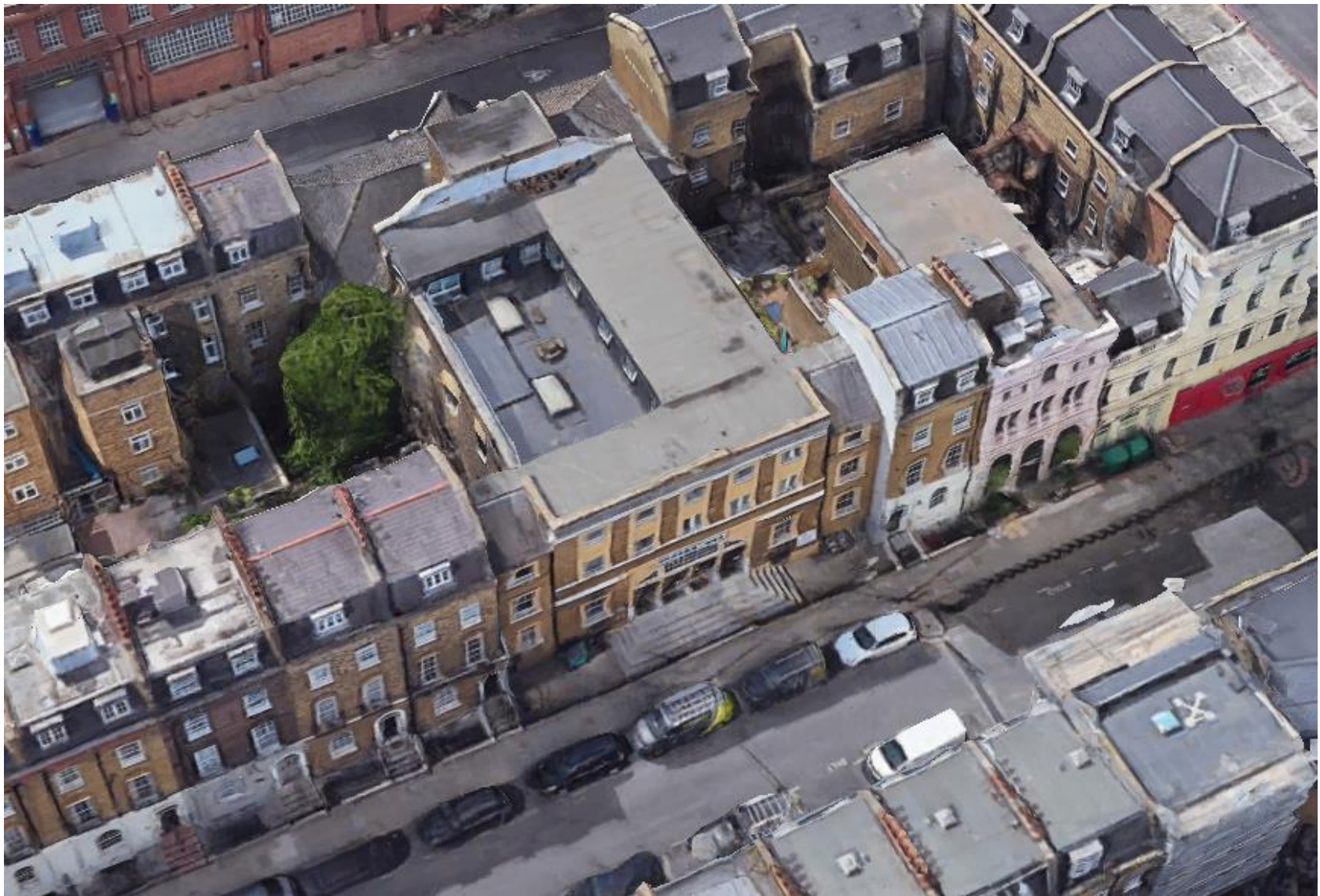
King's Cross Methodist Church
58A Birkenhead Street
London
WC1H 8BW



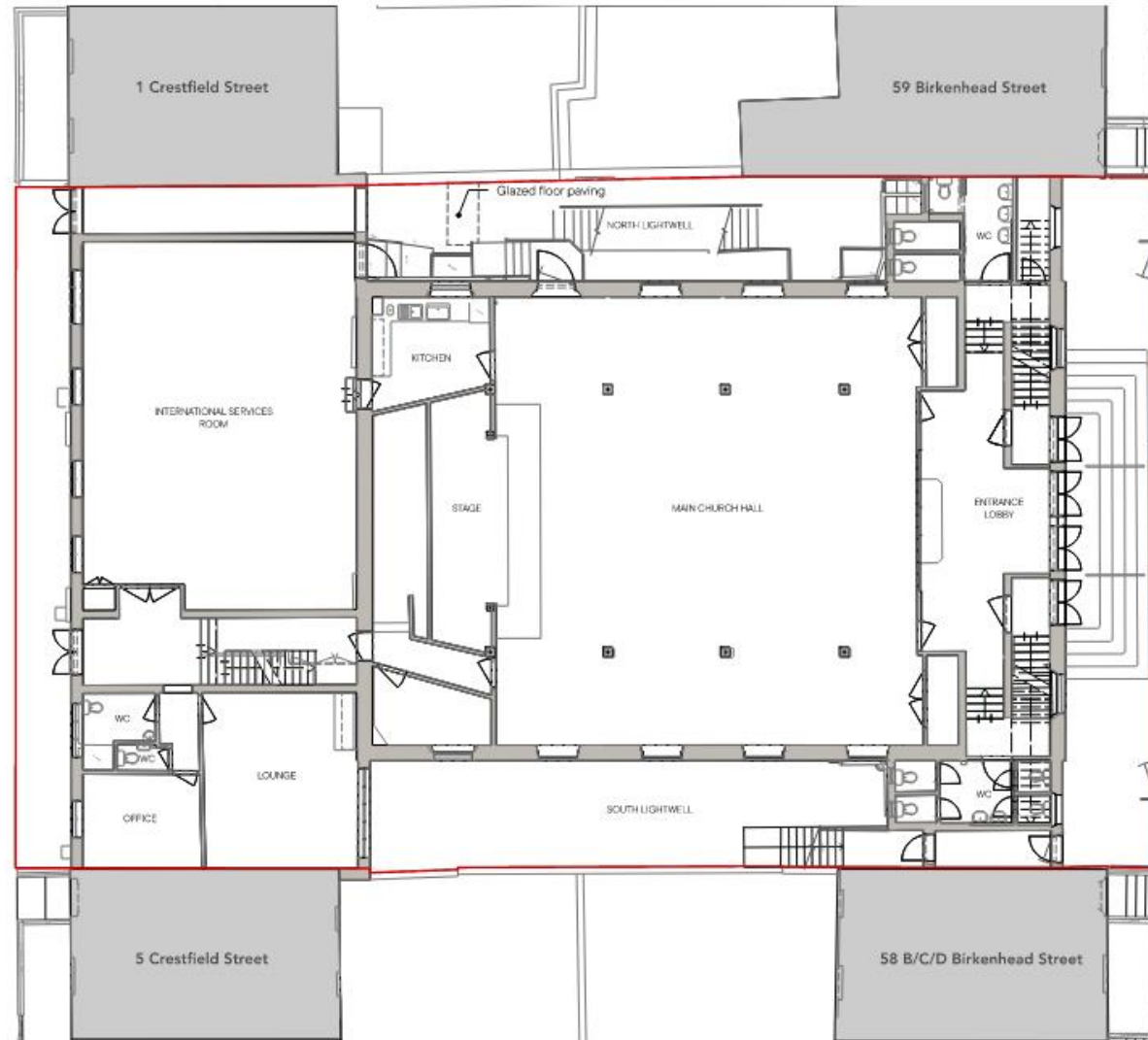






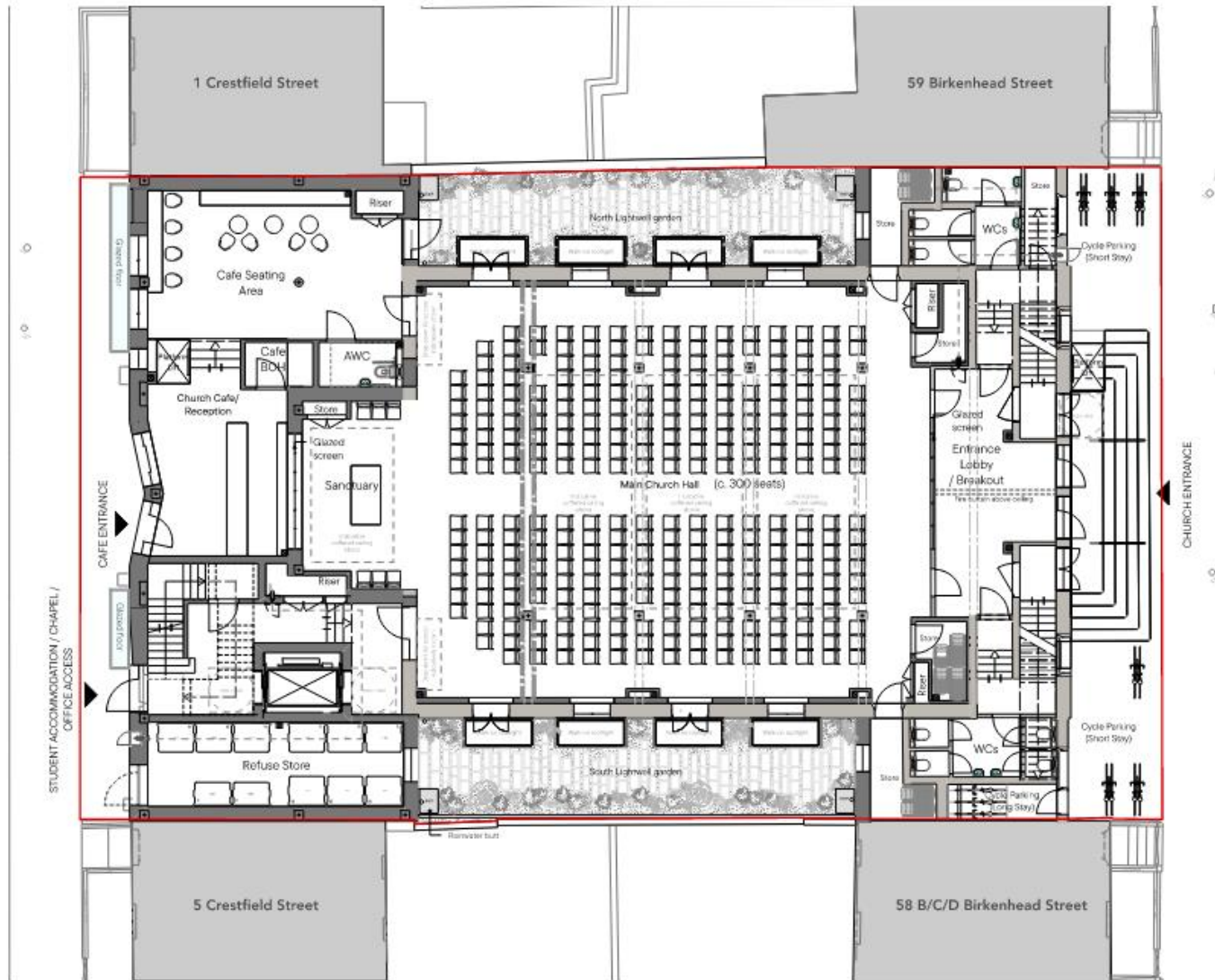


CRESTFIELD STREET



BIRKENHEAD STREET

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