

<b>Address:</b>	11-13 St Pancras Way London NW1 0PT	
<b>Application Number:</b>	2011/1586/P	<b>Officer: Amanda Peck</b>
<b>Ward:</b>	St Pancras & Somers Town	
<b>Date Received:</b>	29/03/2011	
<b>Proposal: Erection of part 6, 7, 8 and 10 storey building comprising 3,657 sqm builders merchant (Class Sui Generis) at ground and part mezzanine level and 563 student bedspaces (Class Sui Generis) with ancillary student facilities to the upper floors.</b>		
<b>Drawing Numbers:</b> 0500 -001; -002 rev A, -003 rev A; -004 rev A; -005; -006; -102 rev; -103 rev E; -104 rev D; -105 rev D; -106 rev D; -107 rev D; -108 rev D; 109 rev D; -110 rev C; -111 rev C; -112 rev D; -220 rev C; -221 rev C; -222 rev C; -223 rev C; -225 rev B; schedule of accommodation; Air quality assessment, dated 25 March 2011; BREEAM Unite accommodation, dated 25 March 2011; BREEAM Travis Perkins facility, dated 25 March 2011; Draft Construction Management Plan, dated 25 March 2011; Daylight/Sunlight report, dated 25 March 2011; Ecology Report, 25 March 2011; Geo Environmental Report Phase 1, dated 25 March 2011; Geo Environmental Report Phase 2, dated 25 March 2011; Noise Impact Assessment, dated 25 March 2011; Planning Statement ref MR/GB/11729; Student Accommodation Needs Assessment, dated March 2011; Energy and Sustainability Statement, dated 25 March 2011; Statement of Community Involvement dated 25 March 2011; Transport Statement, dated 25 March 2011;; Water Environmental Impact Statement, dated 25 March 2011; supplementary information in support of proposed student accommodation (and appendices), dated June 2011; CGMS response to outstanding matters letter, dated 28 June 2011, ref GB/cjd/11729; WSP response – GLA stage 1 letter, dated 23 May 2011, ref 110517 AF PECK; Environmental Noise Survey and External Building Fabric Report, dated 14 June 2011 rev 3.		
<b>RECOMMENDATION SUMMARY: Grant planning permission subject to a S106 legal agreement being completed and any direction by the Mayor of London.</b>		
<b>Applicant:</b>	<b>Agent:</b>	
Unite Group PLC and Travis Perkins PLC C/O Agent	CGMS Limited Morley House 26 Holborn Viaduct London EC1A 2AT	

### ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace
Existing		<i>Sui Generis Builders Merchant</i>	2,893m <sup>2</sup>

Proposed	<i>Sui Generis Builders Merchant</i> <i>Sui Generis Student accommodation</i>	<i>3,657m<sup>2</sup></i> <i>14,264m<sup>2</sup></i>
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**Residential Use Details:**

	Residential Type	No. of Habitable Rooms per Unit								
		1	2	3	4	5	6	7	8	9+
Proposed	<i>Cluster flats</i>		2			12	19	27	20	
Proposed	<i>Studios</i>	36								

**Parking Details:**

	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	<i>Undesignated areas on site</i>	<i>Undesignated areas on site</i>
Proposed	<i>6 (3 staff, 3 customer)</i>	<i>3 (1 customer, 1 staff, 1 student)</i>

## **OFFICERS' REPORT**

**Reason for Referral to Committee:** This application is reported to Committee because it proposes a major development of more than 1000m<sup>2</sup> of non-residential floorspace [clause 3(i)] and is subject to a Section 106 legal agreement which in part relates to matters outside the scheme of delegation [clause 3(vi)].

**Members are advised that as the proposed development exceeds 30m in height and has a total floorspace of more than 15,000m<sup>2</sup> it is referable to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008. If the Council resolves to make a draft decision on the application, it must consult with the Mayor again under Article 5 of the Order.**

### **1. SITE**

- 1.1 The application site relates to the existing Travis Perkins Builders Merchant site on St Pancras Way a short distance from the junction with Pancras Road, Crowndale Road and Royal College Street. The site houses two relatively large single storey warehouse shed structures, (one being the customer sales area and joinery store and one being a storage area) and three service yards/parking areas.
- 1.2 The north of the site is bounded by a 7 storey student accommodation building at the corner of College Grove and St Pancras Way (232 bedspaces), which was granted planning permission in 2005 and beyond that a large Parcel Force depot. To the north the site is also bounded by a 4 storey halls of residence on College Grove forming part of the Royal Veterinary College Campus (83 bedspaces). To the south is the 3 storey St Mungo's homeless persons hostel at 9 St Pancras Way and beyond that a residential development is under construction at 1-5 St Pancras Way. The rear of the site (to the west) is bounded by the Royal Veterinary College Campus which consists of a variety of buildings ranging from 3-5 storeys. Opposite the site is the large three storey sorting office building and St. Pancras hospital with a variety of 2 storey pre-fabricated buildings and 5 storey brick buildings.
- 1.3 The buildings are not listed. The site does not itself form part of any conservation area, however it lies immediately north of the Kings Cross Conservation Area which includes the RVC campus and is across the road from the Regent's Canal Conservation Area as the Canal passes behind the buildings on the east side of St Pancras Way at this point. The site is within proximity of a terrace of grade II listed buildings on Royal College Street to the west of the site. The site does not fall within any designated strategic view.
- 1.4 The site is part of an enclave of sites in the immediate area which will see significant regeneration and renewal over the coming years, including redevelopment of 103 Camley St and St Pancras Hospital, in conjunction with other new development commenced or recently completed in the area between Kings Cross and Camden Town.

### **2. THE PROPOSAL**

## **Original**

- 2.1 The proposal is to provide purpose built builders merchant (sui generis) accommodation at ground floor level including a single storey sales building to the north of the site; a new vehicular route through the site to enable on site servicing; purpose built storage areas; and on site customer and staff parking. The ground floor also includes the entrance, refuse area and cycle storage for the student accommodation at the upper floors, a plant area for both the commercial and student elements and an associated open vehicular access area for maintenance of this plant. Three small mezzanine levels are provided to the plant room; the student entrance (to provide cycle storage) and the staff area (to provide a staff room).
- 2.2 The upper floors would comprise four brick clad blocks housing student accommodation in a stepped building ranging from 5-9 storeys (on top of the ground floor level). The building steps up in height towards the middle of the site and steps away from St Pancras Road towards the north of the site. From south to north: Block A is 6 Storeys; Block B is 9 storeys; Block C is 7 storeys; and block D running perpendicular with the road would comprise 6 storeys. A total of 563 bedspaces are proposed in a mixture of 36 studios and 80 cluster flats (2 x 2 bed, 12 x 5 bed, 19 x 6 bed, 27 x 7 bed and 20 x 8 bed).

## **Revisions**

- 2.3 The scheme has been revised since submission in the following ways:
- Access – A total of 50 accessible rooms (8.9%) are now proposed as opposed to the 28 rooms originally proposed (5%). Specifically the amount of fully fitted out accessible rooms has been increased from 6 (1%) to 28 (5%) and consequently the amount of rooms capable of adaption in the future has been decreased from 22 (3.9%) to 21 (3.8%).
  - The amount of on site shared facilities have been increased from 261m<sup>2</sup> to 468m<sup>2</sup> with the inclusion of two additional common rooms on the 1<sup>st</sup> and 7<sup>th</sup> floors.
  - It was originally proposed to have 144 uncovered Sheffield stands located at the rear of the podium. Because of the convoluted route from main entrance, the lack of overlooking and the lack of any cover these have been relocated to the ground floor within the maintenance area.
  - The external design has been amended with the repositioning of the staircases from the rear elevation to the front elevation, the increase in size of the windows; amendments to the window layout; alterations to the ground floor elevation at the southern end and the setting back for the top floor by a total of 0.5m from the front elevation.
  - 324sqm of PV panels are now proposed on blocks A and B
  - Changes have been made to the ground floor parking layout including the provision of 3 staff cycling spaces
- 2.4 Additional information has also been submitted including supplementary student needs survey, records of complaints since 2005 at existing UNITE buildings, kitchen size schedule, amended energy and sustainability statement; and a sustainable urban drainage system report.

### 3. RELEVANT HISTORY

#### *Application site*

- 9003292 - The formation of new windows to front elevation and minor elevational alterations together with the formation of a mezzanine floor to provide additional ancillary accommodation for the existing builders. Approved 22 August 1990
- CTP/J13/3/D/33935 - Alterations and extensions to the northern portion of the property including the formation of two open yard areas in connection with a new builder's merchant's depot. Approved 16 June 1982
- J13/3/D/34378 - Alterations and works of conversion in connection with a new builders merchants depot including the formation of an open storage yard area. Approved 13 September 1982
- J13/3/D/32261 - The erection of 16 light industrial units. Approved 23 November 1981

#### *Other relevant decisions in Camden and other boroughs (in date order)*

- 15-27 Britannia Street (263 student bedspaces, performing space, 4 x residential units and B1 floorspace) – 2011/2179/P – Application currently being assessed.
- 10a Belmont Street (160 student bedspaces and B1 floorspace) – 2009/4257/P – Appeal dismissed February 2011 due to impact on residential amenity, construction impact and low quality replacement B1 floorspace (not because of failure to deliver mix of housing types).
- 65-69 Holmes Road (268 student bedspaces, B8 floorspace and A1 unit) – 2010/6039/P – Application refused Feb. 2011, appeal lodged and due to be heard later in the year. Reasons for refusal – failure to deliver mix of housing types; overconcentration of students; failure to demonstrate need for student bedspaces; loss of employment space; noise and disturbance; overshadowing; lack of information sound attenuation; lack of cycle parking and various S106 points.
- Kings Cross Central, plot T6 (657 student bedspaces, A1/A3/A4 unit) – 2010/4468/P – Application approved Jan 2011.
- 200 Euston Road (Change of Use from B8a to 184 student bedspaces) – Application refused Jan 2011. Reasons for refusal - failure to deliver mix of housing types, loss of employment space, quality of student accommodation and various S106 points.
- Blackburn Road (349 student bedspaces, employment floorspace) – 2009/5823/P – Appeal allowed Sept 2010 on the basis that the development would provide a suitable mix of units and households and advantages of proposed scheme outweigh any lack of affordable housing.
- 120-138 Walworth Road (232 student bedspaces, 734 commercial floorspace) – 09-AP-1069 - appeal allowed July 2010 on the basis that there was a need for student accommodation and the development would not have a detrimental impact on housing mix in the area.
- 45 Sidmouth Street (114 student bedspaces, 31 residential units) – 2009/3215/P – Appeal dismissed June 2010 due to failure to preserve setting of St. George's Gardens, impact on conservation area, impact of such a number of students on the area and failure to secure a balance of uses.
- Chichester girls school (321 student bedspaces) – CC/09/01276/OUT – Appeal allowed June 2010 on the basis that development would not impact the character of the area and the number of students would not impact residential amenity.

- 13 Hawley Crescent & 29 Kentish Town Road (114 student bedspaces and 1,369m<sup>2</sup> commercial) – 2009/3072/P – Application approved October 2009.
- Three Colts Lane (257 student bedspaces, business units) – PA/07/02054 - Appeal dismissed Dec 2008 due to impact on the character of the neighbourhood from the number of students and impact on the area from the scale and design of the building (location for student accommodation considered to be acceptable).
- 2-12 Harmond Street & 34 Chalk Farm Road (192 student bedspaces) – 2008/2981/P - Approved Sept 2008
- 15-23 St Pancras Way (232 student bedspaces) – 2005/0719/P – Approved May 2005.
- 54-74 Holmes Road approved (182 student bedspaces, B1 floorspace) – 2003/1212/P – application approved October 2003.

#### 4. CONSULTATIONS

##### Statutory Consultees

- 4.1 **Greater London Authority** (including comments from Transport for London) – The application falls into height and floorspace categories requiring it to be referred to the Mayor. The GLA stage 1 report sets out the Mayor’s views on the scheme. In summary the Mayor considers that the proposals do not comply with the London Plan but suggests possible remedies to address the deficiencies of the scheme. The GLA stage 1 report is summarised below with the possible remedies being stated where deficiencies are found:-
- Land use: This mixed use development is acceptable in principle; however in order to comply with draft replacement policy 3.8G, the occupation of the student accommodation will need to be secured to an end user by way of section 106 agreement.
  - Urban design: The proposal, by reason of the architectural approach, scale, bulk, massing, and detailed design, is inconsistent with London Plan policy 4B.1, 4B.9 and 4B.10. Further information and amendments to the scheme are required before the application is reported back at Stage 2 to address concerns about the bulk, scale, massing and architecture, as well as the internal layout and quality of the accommodation
  - Access: The scheme has made effort to integrate inclusive design, however insufficient information has been provided in order to demonstrate that the scheme accords with London Plan policies 3A.5, 3D.7 and 4B.5 Further information is required before the application is reported back at Stage 2 in relation to the design and layout of the accessible units that are proposed.
  - Climate change mitigation: The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole and the proposal is broadly acceptable, however, further information is required before the carbon savings can be verified and the scheme can be considered in accordance with London Plan energy policies. Further information and commitments are required before the application is reported back at Stage 2. The applicant should explore opportunities to reduce the energy requirements (and carbon emissions) of the development through the use of further demand reduction and energy efficiency measures and investigate options to link to future district heating networks. The possibility of using photovoltaic panels as a renewable energy source should also be explored further. Further information on

- how the carbon savings resulting from the CHP have been calculated, how the student accommodation would be prevented from overheating are also required
- Climate change adaptation: Whilst the applicant's commitments are welcomed, further details are required to ensure that the proposal complies with the Mayor's Sustainable Design and Construction SPG and London Plan policies 4A.9, 4A.11 and 4A.14. The applicant is requested to provide further details of the extent of green roofs and sustainable urban drainage systems, together with how overheating and cooling of the accommodation can be achieved through passive design.
  - Transport: The proposal, by reason of the lack of information and mitigation measures, fails to comply with London Plan transport policies. Further information and discussion is required before the application is reported back at Stage 2. This relates to amendments to the parking layout, further details regarding the transport assessment, EVCP, details of cycle parking, pedestrian audits, bus stop audits and bus patronage, travel plans, servicing and deliveries, and construction logistics. Further discussion is also required in relation to an appropriate level of financial contribution to the Mayor's cycle hire scheme, way finding, bus stop and bus route improvements, together with conditions and other obligations to be secured as part of any planning permission.

### **Conservation Area Advisory Committee**

#### **4.2 Regents Canal CAAC – object to the proposal for the following reasons:**

- The site is on the west boundary of the Regents Canal conservation area and impacts on the CA because of views down Granary Street and from the tow path of the canal. The presentation shows the building from the tow path and Granary Street looking west and appears to minimise the bulk of the development. A sectional drawing along Granary Street and photomontages are required to give accurate images of its size.
- The highest part of the proposal is probably not visible from the canal over the sorting office building.
- The buildings, particularly the 10 storey block, will be the highest in the neighbourhood and will have an important impact from Royal College Street and Plender Street which are not adequately demonstrated in the application. It will have an impact on the listed buildings at 6-10 Royal College Street which is not adequately demonstrated
- St Pancras Way was once completely industrial frontages but is now increasingly residential.
- The application form gives no details of housing mix and appears to be single rooms with some doubles. This is a large development in excess of SPG 2 (housing) guidelines and does not comply with policy CS6. Nevertheless it does create an upper level which is in effect an amenity space for the housing. This area is inadequate for the density of housing proposed. The platform should allow a more normal mix of accommodation to be built, to comply with housing policy and to allow for units at affordable rents to be included.
- The form of construction for the proposed housing units is a single cell prefabricated unit system. The proposal will be inflexible and incapable of adaptation to alternative mixes and uses and will not comply with SPG 2 (housing).

#### 4.3 Kings Cross CAAC –

##### *Original scheme*

- The site abuts and faces parts of the Kings Cross Conservation Area.
- While some measures appear to have been taken to mitigate the massiveness of the scheme at higher levels there is concern regarding the unfriendly effect that the development will have on the character of the street at pavement level (the frontage at the moment is broken into buildings and yards and the proposal is for one continuous and relentless building; a façade design of a tall metal ‘fence’ below a continuous fascia beam is applied over most of the length and the ground floor is 6m in height which emphasises rather than mitigates the inhuman scale; the south end use as plant extends this unwelcoming façade and would be better used for shops; the gateway to the ‘service year’ is similarly hostile in design.
- The accommodation of 564 student bedrooms seems to offer little amenity for the residents. They might expect to find cafes and local shops at street level and instead they will be disgorged onto a bleak pavement with no local relief to hostile surroundings.

##### *Amended scheme*

- The alterations to the southernmost end will shorten the fascia beam by a small amount, but its relentless form continues through the rest of the site. The Beam is claimed to be ‘tectonic’ and we suggest the tectonics are therefore at fault
- The ‘industrial aesthetic’ referred to works best when modulated by subdivisions. The street façade needs humanising
- The plant room is not part of the builders merchants area and should be located at an upper level or in the basement to make way for small shops on the street;
- We infer that the applicants might have been happy for the site to contain nearer to 5,000 students than 564 had it been larger. But we consider that there are humane limits to size coupled with density which have been exceeded here. Playing around with the shapes of the windows distracts from addressing that fundamental problem.

#### **Local Groups**

- 4.4 **Elm Village TRA** – Residents expressed no significant reservations and felt, in light of the experience of the building further up St. Pancras Way, that student residents are likely to enhance the demography and economy of the area. We have heard of no incidents or antisocial behaviour and at least some of the residents patronise local shops and our local pub. In addition we feel that such accommodation takes some of the competition out of the local market for rented property and so indirectly benefits our young people.

#### **Adjoining Occupiers**

	<b>Original</b>
<i>Number of letters sent</i>	93
<i>Total number of responses received</i>	2
<i>Number of electronic responses</i>	0
<i>Number in support</i>	2
<i>Number of objections</i>	0

4.5 A site notice was displayed between 13 April and 4 May and a press notice was in place between 21 April and 12 May and two letters of support were received as follows:

- Royal Veterinary College, Royal College Street – Recognises the changing nature of St Pancras Way and the wider area in term of higher education institutions. The proposals would see an improvement to the availability of student accommodation in the immediate vicinity of the college.
- St Mungos, 9 St. Pancras Way – we are the immediate neighbour of Travis Perkins and have had helpful discussions with the development team around their plans. We see the plans as positive for two main reasons: 1) t the moment the site can be noisy, lorries arrive with deliveries and queue on St. Pancras way for collections creating noise in the early morning. We are pleased to learn that the new building would reduce the noise problem by being more covered and better laid out, reducing congestion and allowing deliveries later in the morning; 2) student accommodation is a highly appropriate type of housing for a site next door to a hostel and we have found that students are generally less prone to preconceptions about our client group than other groups. We are therefore hopeful that this will lead to fewer unjustified complaints from residents that affect our operations.

Three letters of support were also received from the local ward Councillors as follows:

- Cllr Robinson – the ward Councillors fully support the application – it is sorely needed for an area with many further education colleges and universities; the development would not cause any problems with local residents; and will also tidy up the present site. It will be efficiently managed by 24 hour concierge and with full security and noise levels will be controlled by staff if it occurs. It is unlikely that Camden Council would have any funds to build social housing on the site and housing is proposed on other sites in the area in the future which will add to the mix in the area. We need more student accommodation and I support the application.
- Cllr Brayshaw – at the St Pancras and Somerstown Area Action Group there was a full discussion on three student housing proposals affecting the ward (T6 DC approved, this application site and 103 Camley Street) Resident responses both on policy and individual cases were mixed, but there were a number of voices in favour of student housing. While the total pipeline is 1,700 places our ward is currently below the average in purpose built student accommodation, despite the large and growing need due to expansion of UCL and RVC and the imminent opening of the University of the Arts in KX Central. We ward Councillors know that growing numbers of family flats and maisonettes including on council estates in the ward being brought up by buy-to-let landlords are being let to and very actively marketed to students, reducing our available family stock. New purpose built student accommodation could alleviate this situation and thus (irrespective of other S106 benefits) be of great advantage to the people of the ward and the Council's policies for and duties to the people of the ward.
- Cllr Khatoon - I agree with both of my colleagues regarding the student accommodation, I believe there is a need. As far as I am aware, Travers Perkins had completed the consultation with the local residents and there was

no objections from the residents. We all know that it is a very difficult moment for the students. The increased tuition fees means many students will be unable to study, therefore this development will provide the students to get a cheap accommodation.

## 5. **POLICIES**

### 5.1 **LDF Core Strategy and Development Policies**

#### **Core Strategy**

CS1 Distribution of growth

CS2 Growth areas

CS3 Other highly accessible areas

CS4 Areas of more limited change

CS5 Managing the impact of growth and development

CS6 Providing quality homes

CS8 – Promoting a successful and inclusive Camden economy

CS10 Supporting community facilities and services

CS11 Promoting sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental standards

CS14 Promoting high quality places and conserving our heritage

CS15 Protecting and improving our parks and open spaces and encouraging biodiversity

CS16 Improving Camden's health and well-being

CS17 Making Camden a safer place

CS18 Dealing with waste and encouraging recycling

CS19 Delivering and monitoring the Core Strategy

#### **Development Policies**

DP2 Making full use of Camden's capacity for housing

DP3 Contributions to the supply of affordable housing

DP6 Lifetime homes and wheelchair housing

DP9 Student housing, bedsits and other housing with shared facilities

DP13 employment premises and sites

DP15 Community and leisure uses

DP16 The transport implications of development

DP17 Walking, cycling and public transport

DP18 Parking standards and limiting the availability of car parking

DP19 – Managing the impact of parking

DP20 Movement of goods and materials

DP21 Development connecting to the highway network

DP22 Promoting sustainable design and construction

DP23 Water

DP24 Securing high quality design

DP25 Conserving Camden's heritage

DP26 Managing the impact of development on occupiers and neighbours

DP28 Noise and vibration

DP29 Improving access

DP30 Shopfronts

DP31 Provision of, and improvements to, public open space and outdoor sport and recreation facilities.

DP32 Air quality and Camden's clear zone

## 5.2 **Supplementary Planning Policies**

Camden Planning Guidance 1 – Design (April 2011)  
Camden Planning Guidance 2 – Housing (April 2011)  
Camden Planning Guidance 3 – Sustainability (April 2011)  
Camden Planning Guidance 4 – Basements (April 2011)  
Camden Planning Guidance (2006)  
Kings Cross Conservation Area Statement (2004)  
Regent's Canal Conservation Area Statement (2008)

## 5.3 **Strategic and Government Policy**

London Plan (Consolidated with alterations since 2004) February 2008  
Draft replacement London Plan  
PPS1, PPS3, PPG13, PPS23.

## 6. **ASSESSMENT**

6.1 The principal consideration material to the determination of this application and summarised as follows

- Land use – acceptability of the replacement commercial floorspace and proposed student accommodation
- Design
- Amenity – overlooking/daylight/sunlight, noise, standard of accommodation
- Transport implications
- Sustainability and energy issues
- Landscape and biodiversity
- Accessibility
- Other Issues - local labour and procurement, Open space, Health contributions, Community contributions, archaeology, refuse and recycling.

### 6.2 **Land use**

#### ***Commercial/Employment floorspace***

6.2.1 The site is not within a designated Industry Area, however Policies CS8 and DP13 are relevant as they seek to protect existing employment sites. Policy CS8 states that the Council will safeguard existing employment sites and premises that meet the needs of modern industry and other employers and Policy DP13 states that the Council will consider schemes for mixed use provided that the level of employment floorspace is maintained or increased, they include other priority uses and the proposed non-employment uses will not prejudice continued industrial use in the surrounding area.

6.2.2 The site makes an important strategic contribution to the local economy as Travis Perkins are a significant supplier to the construction industry and the site is located close to a number of large redevelopment sites, most significantly the Argent Kings Cross redevelopment, and many of Travis Perkins' customers purchase bulky goods (bricks, stone, timber) which can be easily transported to nearby sites. It should be noted that this is one of Travis Perkins most profitable sites in the country.

- 6.2.3 The proposal will result in an increase in the amount of commercial floorspace from 2,893m<sup>2</sup> to 3,657m<sup>2</sup> and will result in a better quality accommodation as well. The ground floor will provide purpose built, modern floorspace, with improved vehicular access and servicing arrangements (including a one way access road through the site to avoid the need for any reversing onto St Pancras Way, loading bay areas for large vehicles and customer pick up areas) and internal floor to ceiling heights of nearly 6m. Whilst the space has been provided specifically for Travis Perkins needs it appears flexible enough to provide high quality accommodation for a variety of occupants. .
- 6.2.4 The scheme has been designed in order to ensure that the non employment uses will not prejudice continued industrial use on this site or the surrounding area: a separate entrance is provided for the student accommodation which is set away from the vehicular entrance into the site; the student accommodation is raised away from any traffic/servicing noise because the ground floor has such high floor to ceiling heights; and a noise impact assessment has been submitted and this states that any noise from plant on the site will meet Camden's noise standards.
- 6.2.5 The proposal is therefore considered to provide an acceptable amount of good quality replacement employment floorspace in line with the relevant policies.

***Student accommodation***

- 6.2.6 There are a number of policies to take into account in considering this issue. These issues are linked in such a way that it is suggested that they need to be considered together before reaching conclusions. Although this part of the analysis breaks down into some of the key relevant policies in order to assist logical consideration, it should be borne in mind that there are cross-cutting considerations and the conclusion to this section should be reached by putting the policies together, rather than concluding individually on each individual policy. The two key considerations are the provision of an appropriate mix of housing and whether there would be an over concentration of students in the area, which both then relate to the contribution of the development to a mixed and inclusive community.
- 6.2.7 Paragraph 69 of PPS3 on Housing indicates that in determining applications, LPAs should 'ensure housing developments have a good mix of housing, reflecting the accommodation needs of specific groups, in particular families and older people'. Policy CS6 c) supports additional student housing providing it does not prejudice the Council's ability to meet the target for self contained homes, doesn't upset the balance of uses in the area nor the quality of residential amenity or the character of surrounding area. Policy DP9 states that in principle, the Council will support the development of student housing. However, it states that it should not result in the loss of permanent self contained homes; prejudice or compromise the capacity to deliver market and affordable housing; involve the loss of sites suitable for affordable housing or housing for older people or vulnerable people; should have easy access to public transport, shops, services and other community facilities; should contribute towards creating a mixed and inclusive community; and should not create an over-concentration of such a use in the local area or cause harm to residential amenity or the surrounding area. This is echoed by policy 3A.25 of the London Plan (2008) and draft replacement London Plan policy 3.8. The reason for

promoting the provision of purpose built housing for students is that it reduces the pressure on the existing supply of market and affordable housing.  
Taking each part of policy DP9 in turn:

- 6.2.8 Loss of permanent self contained homes - The proposed development will not result in the loss of permanent self contained homes as the site is entirely in use by Travis Perkins and there are no residential units on site.
- 6.2.9 Prejudice or compromise the capacity to deliver market and affordable housing – Student housing is considered as a type of hostel use which falls outside any defined Class in the Use Classes Order (i.e. 'sui generis' use). This is due to the way in which it is provided and managed, being aimed at a particular client group, and because of its traditional non self contained nature and reliance on shared facilities.
- 6.2.10 Officers note there have been a large number of student accommodation bedspaces proposed in the borough in recent years. It is appreciated that there is demand for student accommodation, however this has to be balanced against the demand for conventional Class C3 housing (including affordable housing) and the concern that proposals for student accommodation may affect the Council's ability to meet its Annual Housing Targets through the loss of many 'windfall' sites to student housing development. Officers have strongly encouraged the applicants to include permanent Class C3 housing (including affordable housing) within their proposals since the initial discussions at pre-application stage in order to address this issue. It is unlikely that the site owners (Travis Perkins) would come forward with a permanent housing scheme because of their presumption that there would be more noise complaints from permanent residents and that this may impact on their continued operation on the site. Although it might well be argued that if the site is suitable for student accommodation then it must also be suitable for permanent residential accommodation it is noted that this concern is from the current and longstanding owners and means that the site is unlikely to be developed for permanent residential accommodation should this application be unsuccessful.
- 6.2.11 One of the key issues raised by this proposal is the extent to which the proposed use of this site for student housing might prejudice any prospect of permanent C3 residential coming forward in future. In as far as the application site might be considered in principle as an acceptable location for permanent C3 residential use, there arises a potential conflict between the proposed use and the objectives of policy DP9. However the opportunity cost from not securing the possible benefits to the Borough of permanent C3 housing on this site must be weighed against the prospect of no residential use of any sort coming forward on the site if the application is rejected. As already discussed, this is a likely possibility.
- 6.2.12 It needs to be considered that the proposed student housing also brings benefits to the Borough. These may be lesser in comparison to a mixed tenure scheme of market and affordable housing, but DP9 does still acknowledge the contribution that student housing makes to addressing housing needs in the Borough. The benefits must therefore be weighed in the balance as to whether this proposal does or does not comply with DP9 and other relevant policies.

- 6.2.13 Camden's CPG seeks to maximise the benefits to be accrued from student housing by requiring applicants to enter into a legal agreement for the accommodation to be limited to students in Camden and immediately adjoining Boroughs, or better still, tied to a named Camden institution. The applicant in this case has gone as far as agreeing to be limited to Camden and adjoining Boroughs which is in accordance with the SPD. Given the particular circumstances it would have helped the applicant's case if they had gone further and agreed to limit the proposed accommodation to Camden students exclusively. This would have enabled even greater weighting to be given to the benefits of the scheme in addressing Camden housing needs specifically. However the applicant has declined to do so.
- 6.2.14 A number of appeal decisions are material to this application (see relevant history section), in particular the Blackburn Road and Belmont Street decisions. It was concluded by the Belmont Street Inspector that there was no evidence that the site would be developed for self contained housing if the appeal were to fail; that the Council's targets for new self contained homes are not at risk; that whilst Policy DP13 supports development that retains employment use and provides other priority uses such as housing and affordable housing the LDF does not exclude student housing when describing housing as a priority use. It was concluded by the Blackburn Road Inspector that there is no policy that requires each redevelopment site within the area to provide self contained housing; that there was no suggestion from the development of the site for employment floorspace and student housing that the housing targets would not be met and there was therefore no conflict with policy DP9. Another appeal decision within the Borough of Tower Hamlets (Three Colts Lane, dated December 2008) concluded that the fact that the borough makes a high contribution to the supply of student accommodation is not justification for refusing planning permission.
- 6.2.15 It should be noted that the Council has recently refused a scheme for student accommodation at 65 Holmes Road and an appeal into this decision is scheduled for later in the year. There is considered to be a key difference between that scheme and the application site as the Holmes Road scheme involves the loss of employment floorspace and Policy DP13 specifically states that when it can be demonstrated that a site is not suitable for any business use other than B1 (a) offices, the Council may allow a change to permanent residential uses
- 6.2.16 Paragraph 3.3 of Policy DP3 states that the provision of affordable housing is not applicable to genuine student housing. Lack of affordable housing provision is therefore not considered to be a sufficient reason for refusal and this is backed up with the recent appeal decision at Blackburn Road (paragraphs 18-24). In addition it should be noted that the site not allocated for affordable housing and does not have any extant permissions for affordable housing.
- 6.2.17 On balance, having regard to the above appeal precedents, the particular site circumstances and uncertainty of the site coming forward for permanent housing it is considered that there the non inclusion of market and affordable housing is in accordance with Policy DP9.

- 6.2.18 Involve the loss of sites suitable for affordable housing or housing for older people or vulnerable people – The site was not allocated in the previous UDP for housing and has not been identified in the emerging sites allocation DPD as being suitable for housing. The site does not contain any relevant characteristics that would make it particularly suitable for these types of accommodation.
- 6.2.19 Easy access to public transport, shops, services and other community facilities - The site is relatively accessible by public transport with a 4 or 'good' PTAL rating (a rating system for public transport accessibility) and is close to many bus routes, three underground stations (Kings Cross/St Pancras, Mornington Crescent and Camden Town). It is within walking distance to Camden Town centre and the many associated facilities in this town centre.
- 6.2.20 Contribution towards creating a mixed and inclusive community & not create an over-concentration of such a use in the local area or cause harm to residential amenity or the surrounding area - In considering the application as proposed with 543 student bedspaces and the impact upon fostering sustainable, inclusive and mixed communities it is necessary to consider the special needs and characteristics of this area. There are established residential areas to the west on Royal College Street, to the south on St Pancras Way and Pancras Road and to the North on St Pancras Way. The area is also characterised by a mix of employment/commercial uses on St Pancras Way (including the Parcel Force Depot further north and the sorting office building opposite), community uses such as St Pancras hospital on St Pancras Way, the Royal Veterinary College campus on Royal College Street, student accommodation on College Grove and the adjacent homeless persons hostel on St Pancras Way. Sites in the area at St Pancras Hospital and Camley Street are identified in the emerging sites allocation for mixed use development including reprovision of health facilities, residential floorspace, employment floorspace and community uses. The vicinity of the site is thus characterised by a mix of residential, commercial, community, student uses and this is projected to change in the future which is likely to bring considerably more residential presence to the vicinity than currently exists.
- 6.2.21 CPG (housing 2011) states that where there is an existing concentration of student accommodation the Council will assess whether schemes for over 100 units have an impact on the mix and balance of the community. In the Development Policies document at paragraph 9.9 it states that where there is an issue with concentration or balanced communities the Council may either seek the inclusion of self-contained general needs housing on part of the site, or may resist a harmful proposal.
- 6.2.22 Census data from 2001 indicates that the St Pancras and Somers Town Ward had a relatively low number of students over 19 (i.e. not schoolchildren) – 10 other wards had more students each, and the ward had only 4.1% of all the students in Camden (compared with 16.9% in King's Cross, the ward with the highest number, and 14.9% in Bloomsbury). It also had a low proportion of students relative to the overall population – the age 19+ students represented 5.1% of the population, compared with 7.9% borough-wide and 25.4% in Bloomsbury (the ward with the highest proportion) and 23.0% in King's Cross. In 2009/10 HESA figures suggest that St Pancras and Somers Town is now home to 6.1% of Camden's students

while Bloomsbury has gone up to 18.0% and King's Cross has 16.9%. The number of students resident in St Pancras and Somers Town has gone up by 118%, and this compares with 46% for the whole of Camden. Only 5 wards now have more students in each.

6.2.23 There are a number of existing student housing schemes in the area which need to be taken into account in considering whether there might be a harmful concentration of students in the area

- Unite Beaumont Court, 15-23 St Pancras Way (232 units)
- RVC College Grove (83 units)
- Unite Somerset Court, Aldenham Street/ St Mary & St Pancras School (168 units)
- UCL for Evans Hall, Max Rayne, Ann Stephenson and Neil Sharp Houses, 109 Camden Road (Cantelowes Ward) (726 units)
- UCL John Dodgson House, 24-26 Bidborough Street (King's Cross Ward) (160 units)
- Unite 19-29 Woburn Place (King's Cross Ward) (468 units)

The nearest of these (Beaumont Court and College Grove) are adjacent to the application site, but the larger schemes (109 Camden Road and 19-29 Woburn Place) are outside the ward and approx 800 sq m and 1,200 sq m away respectively.

6.2.24 Comparing the places in student halls with the number of students in the ward, it appears that less than half of the ward's students live in dedicated student housing – with most of the others renting self-contained homes. Additional student halls may possibly relieve the pressure on private rented housing, although operators of student halls indicate that demand for places vastly outstrips supply. The only significant unimplemented student housing permission in the area is T6 block at King's Cross Central which will provide 657 bedspaces in total. Although this will have an impact on the overall population mix in the ward, it needs to be seen in the context of permissions for major additions to self-contained housing at King's Cross Central and the Islington triangle. There have been pre-application discussions relating to a student proposal for a site in Camley Street, but these are at an early stage, and may well not translate into a planning application or approval.

6.2.25 St Pancras and Somers Town has also experienced significant growth recently in the number of general needs self-contained homes (Use Class C3). From April 2006 to March 2011, 271 additional self-contained homes were completed in the ward, 9.8% of the borough total (2,666). This included over 200 affordable homes. In St Pancras Way itself, over the same five years, 150 self-contained homes were completed, of which 100 were affordable. Looking ahead to the pipeline of unimplemented permissions, there is permission for over 1,800 additional self-contained homes in the ward, including 44 currently being built at 1-5 St Pancras Way. The King's Cross Central site has permission for the majority of new homes in the ward, with provision for 1,700 additional self-contained homes in addition to the T6 student scheme. The adjacent Islington triangle approval (partly within the ward) provides for another 246 additional self-contained homes.

6.2.26 There is an existing concentration of dedicated student housing in the immediate area of the application site, albeit a relatively modest one (a total of around 315

units on the College Grove footpath next to the application site). Other student housing in and around the ward is too far away to have a cumulative effect on the character and amenity of the site. The St Pancras and Somers Town Ward can be characterised as being an area of high recent growth for general needs housing and for student housing. The growth in students living locally has been particularly high relative to the rest of the borough, but the ward's unimplemented permissions for general needs housing represent more than half of the pipeline for the whole borough. Over the coming 15 years, continued growth in general needs housing and student housing is expected.

6.2.27 The CPG suggests that student housing should be close to Higher Education Institutions and it would therefore be expected to see student housing growth in the ward. There are 2 institutions in the ward (the Royal Veterinary College and new University of the Arts campus at King's Cross Central) and the application site is highly accessible to these and to the many Bloomsbury Higher Education institutions.

6.2.28 It is difficult to identify any substantial impact on existing residents in terms of comings/goings, students congregating outside the main entrance or the use of the podium terrace. This is because the site is suitably far away from existing residential with the closest being further south on St Pancras Way approximately 40m from the southern boundary of the site. In addition the residential units to the north on St Pancras Way are all located at first floor or above. Because of the site's location close to Camden Town and within walking distance of Kings Cross/St Pancras station it is unlikely that students would be concentrated in terms of their comings/goings as they would be frequenting a variety of places and would be likely to approach the site from a number of different locations; from Central London, Camden Town and Kings Cross Central. Whilst some parts of Royal College Street could be considered to be a quiet residential street, both Royal College Street and St Pancras Way are characterised by being wide main roads with bus routes on Royal College Street and commercial traffic on St Pancras Way. The site is therefore within a busy, relatively noisy mixed use area not in close proximity to any existing residential units and there is no evidence to demonstrate that 563 students would harm residential amenity or the surrounding area or be unsustainable. UNITE have submitted additional information showing that since 2005 on their 6 sites (with a total of 1248 bedspaces) within Camden there have only been 2 complaints regarding noise from students, with none at their adjacent site on College Grove. In addition the letter of support from the Elm Village TRA specifically states that they are unaware of any incidents or antisocial behaviour from the existing student block. There is also the potential for a co-ordinated student management plan with the adjacent student block as they are both managed by the applicant.

6.2.29 Other recently appealed or refused applications (see relevant history section) have concluded that there would be an impact on residential amenity because this point is dependant upon the specifics of each site: at Belmont Street it was concluded that the existing terraced houses next door would be impacted; at Three Colts Lane it was thought that the increase of student bedspace numbers in the area from 533 to 790 would tip the balance and would result in a concentration of students using quiet residential streets and impacting on residential amenity. Equally other

decisions have concluded that there would not be an impact; at Blackburn Road it was thought that there was no evidence that there would be any anti-social behaviour from students and no impact on residential amenity or on mixed and balanced communities; at Chichester Girls School because the site was in an area adjacent to a city centre in a busy relatively noisy area it was thought that students would not be problematic; and at Walworth Road the presence of a management plan was thought to overcome concerns. Again at 65 Holmes Road this is a reason for refusal but the specifics of the site are such that students coming and goings would be concentrated in quiet residential streets.

6.2.30 In light of the characteristics of the area described in paragraph 6.2.20, it is not considered the facility should necessarily cause nuisance to established residential areas or that students would unduly dominate the wider area, even given the adjacent student accommodation. The applicant has submitted a draft student management plan in order to minimise the impact of the proposed development on the amenity of local environment and communities. This provides details regarding on-site management, cleaning/maintenance; deliveries and collection times; a strategy for dealing with student move in/out periods; security; and a commitment to developing a community liaison group if requested by local residents. This would be secured via a legal agreement. Contributions are also proposed to be secured to manage the impact on health facilities, community facilities and open space.

6.2.31 Policy DP9 also states that student housing development should serve higher education institutions based in Camden or adjoining boroughs; be located where it is accessible to the institutions it will serve; and include a range of flat layouts including flats with shared facilities. Policy 3.8 of the emerging London Plan takes this requirement further and states that unless student housing is secured through a legal agreement for occupation by members of 'specified institutions' for the predominant part of the year then it will normally be subject to the requirements of the affordable housing policy. The GLA has advised that the intent of this policy is to prevent speculative student accommodation from being developed and to prevent schemes which might prejudice the delivery of affordable housing. Taking each point in turn:

- The proposed student housing partner UNITE has advised that they will be renting the accommodation directly to students themselves and the accommodation will not therefore serve a specific higher education institution. They have included a letter of support from the University of Westminster who have confirmed that they are currently unable to provide accommodation to all of their first year students and the provision of additional purpose built student housing would assist in meeting their current demand. It is recommended that a legal agreement is secured ensuring that the accommodation is restricted to full or part time students enrolled on a course within Camden and adjacent boroughs where the provider of that course is funded by Higher Education Funding Council for England;
- The site is located within a 25 minute walk of a number of institutions including the adjacent Royal Veterinary College, the proposed University of the Arts Campus on the Kings Cross development site, UCL and the school of pharmacy. It is also within a 20 minute bike road of these universities as well as SOAS, Central St Martins, Birkbeck college, City University, London Metropolitan University, Royal Academy of Music, London Business School, Kings College, Central School of Speech and Drama and Cass Business School. The site is also relatively

accessible by public transport with a 4 or 'good' PTAL rating (a rating system for public transport accessibility) and bus links to the University of Westminster, London South Bank University, Kings College, LSE and Homerton University Hospital. The site is within walking distance of three underground stations (Kings Cross/St Pancras, Mornington Crescent and Camden Town). It is therefore considered that this location is readily accessible to a number of institutions that it could serve as it is both within walking and cycling distance of a number of institutions and is close to public transport

- The proposed development provides a variety of unit sizes including studio flats and cluster flats ranging from 2 to 8-bedrooms with shared facilities. The proposal complies with Policy DP9 in this respect providing a range of accommodation that will meet different student's needs

6.2.32 *In conclusion* taking the above policies and considerations raised together, the situation on this issue is a somewhat complex one. It is regrettable that the applicant has felt unable to include permanent Class C3 accommodation, which could have significantly enhanced the credentials of the proposals and shortcomings in relation to policy. It is necessary to consider whether the failure to do so and the consequences of the provision of student accommodation as proposed is sufficiently serious as to warrant refusal

6.2.33 The inclusion of permanent Class C3 housing could have improved the relatively narrow area of housing demand provided for by this sizeable proposal in relation to the breadth and depth of housing needs in Camden. It would appear the site has the physical potential in principle to accommodate permanent C3 housing. Nevertheless, in this location there is not considered to be a compelling argument to suggest that the proposal would ultimately cause a serious imbalance in the residential community of the area in this particular instance (this does not suggest that further schemes for student accommodation would necessarily be acceptable in this area in the future). In as much as it qualifies as non self-contained housing, it would contribute to meeting overall housing targets under regional policy. It would not meet affordable housing needs, but student accommodation schemes would not need to do so provided the following matters are secured via a legal agreement – occupation is restricted to full or part time students enrolled on a course within Camden and adjacent boroughs where the provider of that course is funded by Higher Education Funding Council for England and cannot be let or sold in the general market. If these matters were to be secured, then the accommodation may reduce pressure on the housing stock of general needs housing.

6.2.34 It is therefore concluded on the balance of considerations that in the circumstances of Class C3 housing not being provided within the scheme, the provision of student accommodation within the context of the proposed scheme at this particular time on this particular site does not warrant refusal provided the recommended heads of terms to any legal agreement and recommended planning conditions are met. This follows careful consideration of the entirety of the unique set of considerations for this proposal. In no way should this be regarded as setting any precedent for student accommodation in the area.

6.2.35 The proposed development of this amount of student housing alongside the other uses proposed in future at nearby sites is considered to create a mixed and

inclusive community in a relatively accessible location. The principle of providing additional student housing floorspace within this location is considered to be acceptable and in accordance with planning policy. The GLA has raised no objection to the principle of providing additional student housing floorspace in this location.

### 6.3 **Design**

6.3.1 The site is in an area where industrial uses dominate. Buildings are generally functional in their design and no set pattern of development prevails. The low rise, low quality warehouses on the east side of St Pancras Way along with varied style/era, quality, height and massing of buildings allows for significant increase in height and scale subject to the impact on the adjoining Conservation Areas and nearby listed buildings. In this regard there is good justification behind the principle of the upgrading of a successful business outlet whilst seeking to optimise the remainder of the site for student housing.

6.3.2 The design of the building is limited by the modular form of construction, which is largely driven by the need to support the blocks on a podium on top of a functional commercial unit. The applicant and their design team have engaged in a series of pre-app discussions with officers and have discussed a number of options to ensure the design of the facades would reduce the perceived bulk and provide visual interest and depth to the elevations.

#### ***Ground level***

6.3.3 The proposal provides a replacement for the existing depot at ground floor which runs the entire length of the site. The redevelopment will allow for a purpose built depot for TP to run their operations in an efficient and manageable long term basis. The ground floor consists of 7m high concrete frame/deck which separates the two uses on the site. The impression of a building at ground level is important because buildings are generally experienced at ground level. This is particularly important in this instance with the 7m double height podium.

6.3.4 The need for a functional ground floor level (i.e. entrance and egress; refuse storage; secure cycle parking) is acknowledged. The design has sought to enliven the otherwise dead frontage with perforated metal screens which allows views into the site and enliven the street frontage. The screens vary in width to create rhythm and animation as you travel along the street. The design is considered to improve the character and appearance at street level as well as reflect the nature of the operations whilst seeking to enliven the street frontage as much as possible. The detailed design of the ground floor, including elevational treatment, materials and detailed finishes can be dealt with by way of condition.

#### ***Upper Floors***

6.3.5 The concrete deck separates the commercial activity from the residential and provides a podium to build the residential units upon. The residential units are accommodated in four blocks. The three largest blocks are staggered away from the road from south to north preventing a canyoning effect as you travel along the street. The staggering also allows for a spacious deck and amenity space for the occupiers. The fourth block is situated perpendicular with the road. The form and position of the blocks ensures that the scale of overall development is broken up

and viewed as a series of elements and avoids an undue sense of enclosure or over development of the site. The scale and proximity of blocks A and C successfully mediate between the existing buildings adjoining the site.

- 6.3.6 The heights of the blocks are also staggered, rising from 6-7 storeys at either end of the site (Blocks A, C) to 9 storeys to block B in the centre of the site. Block D would rise 6 storeys. Buildings heights in the area range from 2 to 7 storeys. St Pancras Way is undergoing significant change with a number of new taller buildings between 6 and 7 storeys having recently been permitted or completed. The scale of 3 of the blocks (A, C and D) is in the range of the recently completed schemes along St Pancras Way outside the Conservation Area boundary and considered un-contentious in this regard.
- 6.3.7 It is considered that the site can accommodate the level of development proposed. Furthermore there is logic and rationale to have a taller block in the centre of the site where it does least harm to the character of the adjoining areas. Block B would be visible from Royal College Street and from glimpsed views from Regents Canal Conservation Area through gaps in the built form in these locations. Due to the distances in question the height is not considered to result in harm to the setting of the listed buildings on Royal College Street or character and appearance of the Conservation Area respectively.

### ***External Design***

- 6.3.8 The facades of each block have been broken down into a series of vertical modules. Each module is repeated, with slightly different fenestration patterns, throughout the scheme. The variation provides visual interest as well as rhythm and continuity. The fenestration pattern varies between and within each block from regular aligned windows to cheque board pattern. The end bays frame each block with larger vertical windows which express the communal kitchen and living accommodation. The double height vertical slots to the tallest block (B) seek to define a top, middle and base of the block thereby reducing the perceived bulk.
- 6.3.9 Furthermore large 'cut-outs' in the brick work, expressed stair cores, set back upper floors and projecting mesh screens add an industrial aesthetic to the scheme which relates to the primary use of the site and the general area, as well as providing vertical modulation of the facades and animating the blocks to provide additional depth, layering and shadowing effects. Importantly the window openings and 'cut-out' panels are set 400mm behind the brick screen providing highly expressed punctured opening to add visual interest and depth to the elevations.

### ***Materials***

- 6.3.10 The facades use the same, simple palette of high quality materials. The predominant use of brick conforms with the high level of brick in the adjoining Conservation Areas whilst the concrete frame and mesh screens express the industrial nature of the site whilst retaining continuity between the different uses on the site. It will be necessary to condition the proposed materials of the scheme and the detailed design of some of the elements (windows, doors, fencing, mesh, stair-cores, gates, bike store, bin store) to ensure a high quality is provided.

6.3.11 In conclusion the proposal seeks to optimise the use of the site in an area of limited architectural and historic interest. The height, scale, massing, proportions and bulk of development has been informed by, and respects the local area and adjoining buildings. The blocks have been positioned and designed to reduce the sense of enclosure and bulk. The high quality brick blocks with deep recessed windows and varied fenestration pattern would seek to add visual interest and give a stronger identity to this part of St Pancras Way. On the basis of the above assessment and comments, it is considered that the proposed scheme is appropriate for its context and as such is recommended for approval.

#### ***Community safety***

6.3.12 The scheme has been designed with the needs of community safety in mind with the creation of more active frontages to St Pancras Way and College Grove being particularly welcome. Whilst it is acknowledged that the ground floor elevation includes a fence like treatment this has been designed to be as transparent as possible to increase activity at street level. The student element will benefit from a staffed 24 hour reception area and a student management plan and CCTV is planned for the ground floor commercial element.

#### **6.4 Amenity**

##### ***Overlooking/daylight/sunlight***

- 6.4.1 Policy DP26 seeks to ensure that the amenity of occupiers of neighbouring properties is protected. It states that planning permission will not be granted for development that causes harm to the amenity of occupiers and neighbours in terms of loss of daylight, sunlight, overshadowing and outlook.
- 6.4.2 Policy DP26 states that when assessing the impact of development proposals on light to neighbouring residential properties the Council should apply the tests and standards detailed in the BRE document *Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice*. The nearest residential properties to the development are located 60m away to the rear of the site on Royal College Street or further north and south on St Pancras Way, and all of these are separated from the application site by other buildings. Student accommodation is located to the north on the opposite side of College Grove and rear of the site. The applicant has submitted a daylight/sunlight report which concludes that there are no impacts on the residential units and that there would be an impact on 2 of the kitchens in the adjacent RVC student accommodation to the rear of the site on College Grove for all of the methods of assessment. These rooms are already impacted by existing buildings on the RVC site and serve student accommodation. There is also minimal impact on some of the rooms in the UNITE student accommodation on the opposite side of College Grove in terms of the VSC calculation, however these rooms all meet the ADF, No Sky Line and Annual Probable Sunlight Hours minimum values as recommended by the BRE..
- 6.4.3 With regard to the future occupants on site BRE guidelines for interior lighting levels do not technically apply to student housing, however the applicant has carried out such an assessment on the proposed development. The report demonstrates that the proposed level of daylight to the student bedrooms and living rooms is acceptable: it concludes that 4 of kitchen/living rooms at podium/first floor level do not comply with the ADF calculation. Given the relatively low number of

rooms affected, the fact that student accommodation is transient and the fact that all the bedrooms achieve the relevant standards, it is considered that the proposed accommodation is acceptable in terms of daylight and sunlight.

- 6.4.4 The issue of outlook is about ensuring that occupiers of existing neighbouring properties do not feel enclosed by development, this is particularly important in dense urban environments. The proposed development, by virtue of its height, will be visible to the occupiers of neighbouring residential properties on Royal College Street and on St Pancras Way, and will be located approximately 20m to the south and 10m away to the east of the existing nearby student accommodation and approximately 15m to the hostel accommodation to the south of the site. Given the distance of the residential units, the orientation of the existing student building to the west on College Grove and the lack of any windows on its side elevation, the fact that both buildings on College Grove are in use as student accommodation and the fact that the building has been set back by 15m from the southern boundary it is not considered that it would create a feeling of claustrophobia and enclosure to the existing residential or student accommodation.
- 6.4.5 Camden Planning Guidance (2011) states that new development should not subject neighbours to unacceptable overlooking. The application site is a significant distance from existing neighbouring residential properties, approximately 15m from the hostel to the south, approximately 20m from the student accommodation to the north on College Grove, and will be located at angle away from the student accommodation to the west. This is considered sufficient to ensure that the students inhabiting the accommodation will be able to retain a reasonable degree of privacy.

#### ***Noise Pollution***

- 6.4.6 Noise can have a major effect on amenity and health and therefore quality of life. Policy DP26 and DP28 seek to ensure that new development does not cause noise disturbance to future occupiers or neighbouring properties. It states that development will not be granted for development that is likely to generate noise pollution or development that is sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided. It also states that the Council will seek to minimise the impact of noise from demolition and construction.
- 6.4.7 The Councils standard requirement is that that noise from operational plant is at least 5dB below the background noise level. Where it is anticipated that plant will have a noise that has a distinguishable, discrete continuous note and/or if there are distinct impulses then that plant should operate at least 10dB below the background noise level. The proposed development includes the provision of plant at ground and mezzanine levels to the south of the site, although the applicant has not yet selected the exact plant to be provided. The applicant has submitted a noise impact assessment that confirms that these requirements will be met. It is recommended that a condition be imposed on the permission requiring the submission of further details of all plant and equipment once selected to demonstrate that the standard noise condition can be complied with.
- 6.4.8 The existing Sui Generis Builders merchant use includes open storage yard areas with associated hoists and equipment and on street deliveries and has the potential

to cause noise nuisance problems to adjoining occupants. The proposed development fully encloses the storage and servicing areas and allows for off street deliveries to take place.

- 6.4.9 The application site is adjacent to a busy main road which has the potential to create noise which could cause disturbance to residents of the proposed development. The applicant has submitted a PPG24 a noise and vibration report which confirms that the site falls within noise category C where planning permission should not normally be granted but there may be instances where noise mitigation measures may make development acceptable. Measures to insulate the student units against noise disturbance from external sources, particularly from the railway can be secured by condition.

#### ***Standard of Accommodation***

- 6.4.10 Policy DP26 states that new development should provide an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes, and amenity space. There are no prescribed residential standards that apply for student housing, however, it is pertinent to ensure that occupants have rooms that are appropriately sized with a good level of natural light and access to some outdoor amenity space and communal areas.
- 6.4.11 All of the student accommodation is well proportioned at 13m<sup>2</sup> for a bedroom (including bathroom) within a cluster flat, between 16.8m<sup>2</sup> and 28.5m<sup>2</sup> for shared kitchens and 27m<sup>2</sup> for the studios. As well as their own personal space the occupants can make use of four common rooms located at podium and 7<sup>th</sup> floor levels, study rooms located at second, fourth, fifth, six and seventh floors and two laundry rooms at podium level. The roof terraces at podium and 7<sup>th</sup> floor level are for the use of students within the block and will provide useful outdoor amenity space.
- 6.4.12 Officers consider that on site provision of shared facilities of 1sqm per bedspace should be achieved in line with facilities provided on similar schemes and this would mean that a total of 563m<sup>2</sup> should be provided on site. A total of 468m<sup>2</sup> has been provided as outlined in the paragraph above (not including the roof terraces). Whilst the amount of on site shared facilities has increased as the application has progressed it has not been possible to provide 1m<sup>2</sup> per bedspace and a financial contribution in lieu has therefore been secured of £93,100 to be used to improve existing community facilities in the vicinity of the development.

#### **6.5 Transport implications**

- 6.5.1 Access to the application site will be from St Pancras Way with access also via College Grove which links St Pancras Way with Royal College Street. There are a number of bus routes within walking distance of the site, including routes 46, 214, 168, 88 and 253. Three underground stations are within walking distance of the site: with Mornington Crescent being an 8 minutes walk and King's Cross/ St Pancras being a 20 minute walk. Camden Road station, which is served by London Overground services, is located within 10 minutes walk of the site.
- 6.5.2 Policy CS11 of the LDF Core Strategy and DP16 the LDF Development Policies state that the Council should be satisfied that the travel demand arising from a

proposed development will not increase the reliance on private motor cars. Development should actively promote the use of sustainable modes of transport (DP17). Policy CS11 of the LDF Core Strategy (2010) and DP17 of the LDF Development Policies (2010) state that where a development will create increased travel demand in order to mitigate this and promote the use of sustainable modes of transport a travel plan should be sought. A travel plan provides information to occupiers of the new development which seeks to encourage them to walk, cycle and use public transport as opposed to relying on private motor vehicles

- 6.5.3 The GLA has expressed no significant concern about the principle of the proposed development in transportation terms, however, they requested that additional information was submitted with regard to trip generation and had various detailed questions regarding the ground floor layout prior to planning permission being granted, all of which have been addressed. They also requested that various S106 contributions are secured including the contribution towards a TfL cycle hire docking station, cycle improvements in the area, Legible London contribution, a travel plan, construction management and servicing management plans be provided prior to planning permission being granted, all of which have been addressed. They only outstanding issue is that they remain concerned that the proposed level of cycle parking does not meet TfL's draft guidelines (see below).
- 6.5.4 A Transport Statement has been submitted by the applicant. As part of the current planning application a further trip generation analysis has been submitted in an Addendum report. Given that there is to be between 44 and 152 trips per hour generated by the development it is appropriate to require a Green Travel Plan for this development. . A draft travel plan for the student accommodation has been submitted with the application which is acceptable, although a full travel plan will still need to be submitted and secured through a legal agreement.
- 6.5.5 The Transport Statement indicates that there will be a net increase in two way trips generated by the student element of the new development. It is therefore considered that a number of financial contributions will help to mitigate the impact of the increased trips to and from this site as a result of the development including a £30,000 contribution towards a feasibility study for a new foot/cycle bridge over the canal and a £200,000 contribution towards the cost of providing the bridge, should it prove feasible and other funding becomes available, to improve links with the site and the Kings Cross development, a £28,000 contribution to provide Legible London signage within the area to encourage walking, a £132,000 contribution to provide a TfL cycle hire docking station in the immediate vicinity of the site and a £25,000 contribution towards improving the safety of at the junction of St Pancras Way and Camden Road
- 6.5.6 Policy DP18 seeks to ensure that development provides the minimum necessary car parking provision. It expects developments in highly accessible locations such to be car-free. Where the Council accepts the need for car parking provision it should not exceed the maximum standards for the area in which it is located (excluding spaces designated for disabled people). The proposal includes the provision of 3 disabled car parking bays located at ground floor level (2 spaces for Travis Perkins staff and customers and 1 for students) along with 7 other spaces for Travis Perkins customers and staff. No other car parking is being provided for

students and a Car Free agreement will be secured to ensure that they are unable to obtain on-street permits from the Council. The existing site has 3 open storage yard/parking areas and appears to provide 6 spaces for staff parking and anything from 6-15 spaces for customer parking. Given the fact that there is a reduction in on site parking and the nature of the ground floor use is that bulky items are being bought the provision of 9 spaces is considered acceptable. A condition has been included requiring provision for 3 disabled parking spaces to be provided.

- 6.5.7 Policies DP17 and DP18 require that new development make adequate provision for cyclists by providing cycle parking facilities. Appendix 2 of Camden Development Policies includes cycle parking standards that should be applied to different types of development. For student housing, the requirement is for at least 1 space per 250 sqm, which gives a requirement for 58 spaces (based upon a floor area of 14,264 sqm), which is the equivalent of approximately 1 space per 10 students. The Mayor of London's Draft Replacement London Plan does not contain cycle parking standards for student accommodation. However, the draft TfL document "Cycle Parking Standards: TfL Proposed Guidelines" states that cycle parking at student accommodation should be provided at the rate of 1 space per 2 students, which gives a requirement for 282 spaces. This level of provision is considered by officers to be excessive.
- 6.5.8 The proposed development includes cycle parking facilities for students at ground and mezzanine level with a total of 142 josta 2-tier stands and this equates to 1 space per 4 students. The storage areas are secure, covered and are directly accessible from the main entrance or from the access yard and are therefore considered acceptable in terms of quality and design. Whilst the provision is less than required by TfL's draft guidelines the applicant has agreed to contribute £132,000 towards the provision of a TfL cycle docking station in the area (likely to be in front of the site). Some occupiers may be foreign students who do not have their own bike and would welcome the opportunity to use a TfL pool bike. The scheme also provides Sheffield cycle stands for staff (6 spaces) and customers (10 spaces) to the ground floor commercial unit. Taking both the LDF and London Plan into account, the combination of a significant number of on site spaces along with the contribution towards a new docking station is considered appropriate solution to meeting overall numbers.
- 6.5.9 Policy DP20 of the LDF Development Policies (2010) requires that construction management plans are secured in order to minimise the impact of development on the local road network and local communities and this will be secured with a legal agreement.
- 6.5.10 Policy DP20 of the LDF Development Policies (2010) states that the Council will seek delivery and servicing management plans for developments that are likely to generate a significant demand for the movement of goods and materials when occupied, in order to ensure that the potential impact on the local environment and communities is minimised. The development will result in an improvement with regard to servicing and delivery arrangements for the ground floor commercial floorspace with an on site access road and servicing bays. It is therefore considered appropriate for a servicing management plan to be secured with a legal agreement for the student accommodation only.

### **Sustainability and energy issues**

- 6.6.1 The overall approach to energy should be in line with the Mayor's Energy Hierarchy (i) using less energy; ii) supplying energy efficiently; iii) using renewable energy. Policy CS13 states that the Council will require all development to take measures to minimise the effects of climate change and to meet the highest feasible environmental standards during construction and occupation. It states that new development should be designed to minimise carbon emissions by reducing energy consumption, supplying energy more efficiently and using renewable energy. It states that developments should achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation (which can include sources of site-related decentralised renewable energy). Policy DP22 gives further guidance on sustainable design and construction measures and requires that a pre-development BREEAM Assessment be submitted as part of an application to demonstrate that the proposed new development can achieve a rating of 'very good' or more.
- 6.6.2 In line with the first element of the hierarchy and with LDF and CPG requirements, the applicant has submitted BREEAM pre assessments for both the student accommodation and the commercial floorspace. For the Commercial floorspace this indicates that a minimum 'excellent' rating can be achieved and it will exceed the minimum credit ratings of 60% in energy and water and 40% in materials required under Camden Planning Guidance (2006) achieving 68%, 66% and 64% respectively. For the student accommodation this indicates that a minimum 'excellent' rating can also be achieved and it will exceed the minimum credit ratings in energy, water and materials achieving 78%, 60% and 47% respectively. The applicant should commit to delivering these targets by legal agreement.
- 6.6.3 The proposed development has been designed to incorporate energy efficient building design and technology measures to achieve a reduction of 16 tonnes of CO<sub>2</sub> per annum (2.7%). The following is a summary of the measures which have been incorporated into the design to minimise energy consumption:
- Passive design measures including solar control glazing and shading features
  - High building envelope performance through the use of u-values which deliver best practice.
  - High efficiency gas fired boilers for the student accommodation including variable speed drives, independent control and thermostatic radiator valves
  - Intelligent low energy lighting throughout and local switching PIR, occupancy and photocell sensor control as appropriate.
  - Water efficiency measures including dual flush toilets, low flow basin tables, shower flow restrictors, and urinal flush controls.
  - High efficiency localised mechanical ventilation units.
  - Monitoring and control of energy consumption through a BEM system.
  - Air source heat pumps to be installed in the ground floor commercial areas
- 6.6.4 With regard to the second element of the hierarchy the proposed development includes a gas fired CHP building to achieve a reduction of 223 tonnes of CO<sub>2</sub> (39%) and will incorporate the necessary pipe work to connect to the second phase expansion of the proposed Euston Road district heating systems. The GLA welcome this measure and requested further information in their stage 1 report, which has now been provided to their satisfaction further information on how the

carbon savings were calculated was also provided.

- 6.6.5 With regard to the third element of the hierarchy there is a requirement for a 20% reduction in CO<sub>2</sub> through the use of on-site renewable technologies. The applicant proposes the use of renewable energy in the form of air source heat pumps for the ground floor commercial space and 320m<sup>2</sup> of roof top PV panels on Buildings A and B to achieve a reduction of 26.65 tonnes of CO<sub>2</sub> per annum (8.45%). It is recommended that the recommendations of the energy report are secured through legal agreement.

#### **Landscaping and Biodiversity**

- 6.6.6 Policy CS14, CS15 and DP24 promote the provision of high quality landscaping, the provision of new planting including green and brown roofs which have additional sustainability benefits, and measures to enhance biodiversity. Consistent with these policies the proposed development includes the provision of a green roof on top of Building C and smaller terrace areas of green roof on the 7<sup>th</sup> floor of buildings C and D, the 6<sup>th</sup> floor of building A and the 9<sup>th</sup> floor of building B (approximately 455m<sup>2</sup> in total). The inclusion of these features is welcomed; they will enhance biodiversity, attenuate rainfall, insulate the building and add to visual amenity. No specification for these green roofs has been provided and it would be preferable if they incorporated more bio-diverse planting or a brown roof. Further details of the green/brown roofs should be secured by condition and an informative attached advising the applicant how the features should be amended.
- 6.6.7 Policy DP23 requires that new developments incorporate water efficient features and measures to allow the reuse of water. It states that high or intense water use developments, such as student housing, should include a grey water harvesting system and where such a system is not feasible or practical, developers must demonstrate that this is the case. Incorporating water efficient measures reduces the amount of waste water entering the combined storm water and sewer system. The volume and rate of run off from heavy rainfall entering this system can also be reduced through the provision of sustainable urban drainage measures (SUDS) such as green and brown roofs, and permeable paving. Camden Planning Guidance expects developments to achieve at least 60% of the water credits under BREEAM. The proposed development includes green and brown roofs (see paragraph 6.6.6) as well as planters at podium level and the applicant has submitted a SUDS report. It is considered that the proposed development has been appropriately designed in order to minimise water use

#### **6.7 Accessibility**

- 6.7.1 Policy DP6 of the LDF Development Policies (2010) states that 10% of all new homes should be designed to meet wheelchair housing standards, or be easily adapted to meet them. The policy makes clear that this should also be applied to student housing. Policy DP29 of the LDF Development Policies (2010) imposes a more general requirement that all new buildings and spaces should be designed to meet the highest practicable standards of access and inclusion.
- 6.7.2 A total of 50 accessible rooms (8.9%) are now proposed and specifically 28 (5%) rooms are to be fully fitted out accessible rooms and 21 (3.8%) rooms are to be capable of adaption in the future. The 10% policy requirement has not been

achieved however factors such as the younger age profile likely to be associated with this form of accommodation and lack of opportunities for parking in this car-free scheme should be taken into account. Nevertheless Building Regulations, which categorises student accommodation with hotel uses, would require a total of 10% to be wheelchair accessible – this can be highlighted by an informative.

## 6.8 **Other issues**

### ***Local Labour and Procurement***

6.8.1 The proposed development is a major construction project which has the potential to generate significant local economic benefits. Policy CS19 and Camden Planning Guidance state that in the case of such developments the Council will seek to secure by legal agreement employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.

6.8.2 The applicant has agreed to link into the local employment and training initiatives and opportunities for local businesses during the construction period in excess of those normally agreed including with a target of 20% of construction phase jobs for local residents (normally 15%), 3 construction industry apprenticeships and a rolling programme of two apprenticeships with Travis Perkins in the completed development. Subject to the completion of a legal agreement to secure the above measures, the proposed development will assist in the creation of local employment and business opportunities reinforcing neighbourhood renewal objectives and improving the sustainability of the local economy.

### ***Open Space***

6.8.3 An open Space contribution of £285,965.65 are due via a legal agreement, following the formula set out in adopted CPG.

### ***Health Contribution***

6.8.4 The applicants have agreed to a health contribution of £81,832, following analysis of the costs that would be caused to the provision of health services in the area as a result of the development by using a recognised model called HUDU (referred to in CPG).

### ***Community Contributions***

6.8.5 The scheme provides some common facilities for the needs of students (see paragraph 6.4.11). It is acknowledged that the amount of communal space in the development is unlikely to meet the needs of residents of the accommodation and that a contribution towards the development of community facilities should be made. The applicants have agreed to a contribution of £93,100 be made, taking account of contributions made for other schemes depending upon the facilities provided.

### ***Archaeology***

6.8.6 The site is not in an Archaeological Priority Area, thus there is no need for such conditions.

### ***Refuse and recycling***

6.8.7 All new developments are required to provide adequate facilities for the storage and disposal of waste and recycling in accordance with policies CS18 and DP26. The proposed development includes the provision of a 72m<sup>2</sup> refuse and recycling storage room at ground floor level adjacent to the main entrance for use by the students. The store area has level access directly from St Pancras Way. No specific storage facility has been shown for the ground floor commercial unit. Whilst it is considered that the location of the student bin store is acceptable a condition is suggested requiring further details to be submitted for both the student accommodation and the commercial floorspace to ensure that adequate space is provided.

## 7. CONCLUSION

7.1 On balance though regrettable that the proposals fail to meet more than a relatively narrow area of housing need, DP9 does express support for this type of use in certain circumstances and clearly recognises this area of need. Whilst a proposal of this size might be considered capable of accommodating a mix of residential uses including affordable housing the LDF and London Plan is clear that there is no policy requirement for such uses to be provided bought about by student housing. In light of the characteristics of the area it is considered that the development would not unduly dominate the wider area or cause a nuisance to established residential areas. Various impacts that would be caused to the local area and highways would be satisfied via a legal agreement.

7.3 The design would be high density in an accessible area that is scheduled to undergo considerable change, however it would not be unduly obtrusive in its setting as viewed due to the relief of the area, proximity and lack of serious impact on any sensitive views of significance.

7.4 The proposal raises transport issues, however these have been resolved following discussion, subject to conditions being applied and enabling of alterations being made to accommodate the impacts of the development via S106 commitments.

7.2 Planning Permission is recommended subject to a S106 Legal Agreement covering the following Heads of Terms and any direction by the Mayor of London. :-

### **Student Use**

- Student management plan
- Full of part time students enrolled on a course within Camden and adjacent boroughs where the provider of that course is funded by Higher Education Funding Council for England
- Affordability of units and benchmark price with other similar schemes
- Restricting the use to students only and not to be sole or let as s/c units.

### **Other financial contributions**

- £93,100 Community facilities contribution (based on an on site provision of 468m<sup>2</sup> and a shortfall of 95m<sup>2</sup>)
- £285,965.65 Open space contribution
- £81,832 Health care

### **Regeneration**

- Rolling programme of two apprenticeships within the completed development to be employed by Travis Perkins owner and provided with training on site. The

apprenticeships to be offered to Camden residents aged 16-24 years and recruited via Camden Apprenticeships. Each apprentice to be offered two years employment and recruitment to be on a rolling programme

- 3 construction industry apprenticeships
- Construction phase employment target of 20% local residents
- Local procurement
- Contribution to apprentice placement service and local procurement service £10,000.

#### **Transport/Highways**

- £30,000 contribution towards a feasibility study for a foot/cycle bridge over the canal
- £200,000 contribution towards costs of provision of bridge if a deliverable project is design and can be implemented
- £65,000 Footway reinstatement (St Pancras Way and College Grove)
- £132,000 contribution towards additional TfL cycle hire capacity in the local area.
- £28,000 Legible London Contribution
- £25,000 contribution towards pedestrian and cycle environment improvement within the local area including road safety improvements at the junction of St Pancras Way and Camden Road
- Car free/car capped development
- Construction Management Plan
- Service Management Plan (student accommodation only)
- Travel Plan (student accommodation only)

#### **Other**

- Compliance with Energy/BREEAM/Sustainability plan
- PV panels to be provided on site
- CHP connections in place to link up to future CHP networks. Wheelchair units to be provided and permanently retained
- Not to occupy the student accommodation until it has been confirmed that the commercial element has been constructed and fitted out to shell and core and is ready to let to commercial tenants
- Access Management Plan

7.3 In the event that the S106 Legal Agreement referred to above has not been completed within 13 weeks of the date of the registration of the application, the Development Control Service Manager be given authority to refuse planning permission.

## **8. LEGAL COMMENTS**

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