
PLANNING STATEMENT

In respect of

**11 - 13 ST. PANCRAS
WAY, LONDON**

On behalf of

**TRAVIS PERKINS PLC
AND UNITE GROUP PLC**

CgMs Ref: MR/GB/11729

Date: MARCH 2011

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1.0 INTRODUCTION

- 1.1 This statement assesses the redevelopment proposals for the Travis Perkins site at 11-13 St Pancras Way to provide a new facility for Travis Perkins alongside student accommodation against relevant national, regional and local planning policies.
- 1.2 Travis Perkins has been trading from 11-13 St Pancras Way for more than 30 years. As such the business provides an important source of employment in the area in addition to supporting the local construction industry and facilitating the redevelopment of nearby sites including the Kings Cross redevelopment.
- 1.3 The accommodation on the site is now outdated. Travis Perkins aspire to redevelop the site to provide new purpose built facilities to ensure the efficient operation and secure the long term future of the business at the site.
- 1.4 It is clear from our pre-application discussions with the Local Planning Authority that Council officers recognise the economic benefits of Travis Perkins' operation and would welcome their long terms commitment to the site and the London Borough of Camden.
- 1.5 UNITE are also looking to meet a defined demand for purpose built student accommodation. Together the proposals allow a much more efficient use of the site whilst also contributing to the enhancement of the street scene and regeneration of the local area.
- 1.6 The proposed development has evolved through detailed pre-application consultation during 2010 and early 2011 with officers of the London Borough of Camden, Ward Councillors and local residents and businesses.
- 1.7 This statement is submitted in conjunction with the following supporting information which has been confirmed by the Council as required for the validation of the planning application:

- Air Quality Assessment;
- Daylight/Sunlight Assessment;
- Design and Access Statement;
- Draft Heads of Terms;
- Draft Student Management Plan
- Energy/renewable Energy Statement;
- Noise Impact Assessment;
- Scheme Drawings;
- Service Management Plan;
- Statement of Community Involvement;
- Student Accommodation Need Assessment;
- Sustainability Statement, including a BREEAM initial assessment;
- Transport Statement and Draft Travel Plan; and
- Water Environment Impact Statement

1.8 Section 2.0 of this statement sets out the application site context and relevant planning history. The application proposals are outlined in Section 3.0 followed by details of the pre-application discussions in Section 4.0. Section 5.0 summarises the planning policy framework followed by Section 6.0 which provides a detailed analysis of the scheme against the relevant policies identified. Draft Heads of Terms are set out in section 7.0 which reflect London Borough of Camden adopted policies and pre-application discussions. Finally, Section 8.0 concludes that the proposed development complies with relevant development plan policy and will bring forward significant planning benefits.

2.0 SITE CONTEXT

Description of Site and Surrounding Area

- 2.1 The site extends to approximately 0.47 ha and it is located on the west side of St Pancras Way. The existing built floorspace comprises 2,893 sqm of Class B8/Sui Generis floorspace. A site location plan is provided at **Appendix 1** and photographs of the site and surrounding area are at **Appendix 2**.
- 2.2 The primary entrance into the site is taken from St Pancras Way with a secondary access located at the corner of St Pancras Way and College Grove.
- 2.3 The surrounding area is mixed use in nature as illustrated by the site context plan provided at **Appendix 3**. Directly to the east of the site on the opposite side of St Pancras Way is the four storey ex-Royal Mail sorting office (8 St Pancras Way). To the south east of the site is St Pancras hospital.
- 2.4 Adjacent to the northern boundary of the site is the recently constructed UNITE student accommodation scheme known as Beaumont Court comprising 232 student bedspaces over seven storeys.
- 2.5 The Royal Veterinary College is located to the southwest of the site. The college buildings are predominantly four storeys in height reducing to detached single and two storey buildings adjacent to the Travis Perkins site boundary.
- 2.6 Immediately to the south is St Mungos (9 St Pancras Way) which provides offices and hostel accommodation for the homeless.
- 2.7 The site is easily accessible by public transport with a number of bus routes running along St Pancras Way. Camden Road, Camden Town, Mornington Crescent and Kings Cross stations are all located approximately 10 minutes walk from the site. Further details of the accessibility of the site are provided in the Transport Statement.

Heritage Considerations

2.8 There are no statutorily listed buildings within the curtilage of the appraisal site nor does the site fall within a designated conservation area. The site however lies in between the Regents Canal Conservation Area and Kings Cross St. Pancras Conservation Area.

Planning History

2.9 Travis Perkins have been in operation on the site for more than 30 years.

2.10 There are only four records on the Council's planning register for nos. 11-13 St. Pancras Way which date back to the early 1980s:

- i. LPA Ref: JI3/3/D/32261 - Erection of 16 light industrial units - approved conditionally on 23 November 1981;
- ii. LPA Ref: JI3/3/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 builders merchants depot - approved conditionally on 14 June 1982. The application form outlined that the development comprised 150m² of retail floorspace, 125m² for storage and 1,465m² for warehousing purposes;
- iii. LPA Ref: JI3/3/D/34378 - Alterations and works of conversion in connection with a new builders merchant depot including formation of an open storage yard area - approved conditionally on 13 September 1982;
- iv. LPA Ref: 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 merchants - approved conditionally on 22 August 1990. The application form stated that the mezzanine floor comprised of 187m² of floorspace.

3.0 DEVELOPMENT PROPOSALS

Overall Concept

- 3.1 Alongside Travis Perkins, UNITE are seeking to redevelop 11-13 St Pancras Way for approximately 564 student bedspaces with upgraded facilities for Travis Perkins at the ground floor level.
- 3.2 The Travis Perkins accommodation is arranged over the lower part of the building across the ground floor, with mezzanine shop and office accommodation located at the southern end of the site. Student accommodation is to be provided on the floors above rising from 5 to 10 storeys.

Needs of Travis Perkins

- 3.3 The accommodation currently in use by Travis Perkins has a number of shortfalls which the redevelopment of the site aims to overcome, including the following:
- i. the provision of a covered one way access road through the site to avoid large articulated vehicles reversing into St Pancras Way, avoiding noise, vehicular and pedestrian traffic disruption;
 - ii. dedicated, fully enclosed loading bays for large vehicles to avoid conflicts within the circulation areas;
 - iii. dedicated, customer pick-up and drive through areas;
 - iv. a easily identifiable show room and offices;
 - v. well laid out areas of storage which are overlooked from the office areas and which increases the storage capacity at the site.
 - vi. need for visibility of operation from street frontage to ensure Travis Perkins' presence on the site is obvious to existing and future customers.

Details of Student Accommodation

- 3.4 The proposed student accommodation will be accessed at ground floor level directly from St Pancras Way and provided as a mix of studios and cluster flats. An accommodation schedule setting out the mix of types of student accommodation as proposed is provided in the Design and Access Statement, although to summarise the following mix of accommodation will be provided:
- 41 studio rooms
 - 1 cluster flat with 2 bedrooms
 - 13 cluster flats with 5 bedrooms
 - 19 cluster flats with 6 bedrooms
 - 26 cluster flats with 7 bedrooms
 - 20 cluster flats with 8 bedrooms
- 3.5 In addition to the student rooms, two common rooms will be provided at first floor level and five study rooms located throughout the development. The Council's cycle parking standards are also to be complied with which require one space per 2 student bedspaces. At least one parking space for deliveries by a large van and one disabled parking space is required by UNITE to be able to operate the accommodation effectively.
- 3.6 The site will also be fully landscaped to provide areas of open space for use by the students. In addition, the roof space of Block D will be landscaped to provide a further area of amenity space for use by students.
- 3.7 A two storey plant area is also included as part of the redevelopment to be shared by UNITE and Travis Perkins.
- 3.8 UNITE operate a policy of ensuring all student accommodation has access to a responsible member of staff, within reason, at the residence outside normal working hours. All students living in the accommodation are also required to agree to the terms of a student management plan to ensure no impact on the amenity of those living nearby the accommodation. A draft Student Management Plan produced by UNITE is provided as part of the application submission.

4.0 PRE-APPLICATION CONSULTATION

4.1 The proposed scheme has been designed in close consultation with the Council's planning and design officers, as well as local residents, businesses and organisations and Ward Members.

4.2 UNITE has pro-actively sought to engage with these groups at an early stage of the development of the proposals to ensure that the views of third parties can be taken into account in the evolution of the scheme. Full details of the pre-application consultation undertaken is provided in the accompanying Statement of Community Consultation. Details of the pre-application discussion relating to design are outlined in the Design and Access Statement.

Greater London Authority

4.3 Pre-application meetings were held with officers of the GLA on 24th February and on 8th March.

4.4 Camden's design officer was also present at the meeting on the 8th March which was arranged primarily to discuss design matters.

4.5 A formal pre-application report was published by the GLA on 21st March 2011. As a consequence, further design alterations were made to the scheme to respond to the comments made. Full details of these amendments can be found in the Design and Access Statement. However, to summarise, changes include increasing the size of windows, the varying of the elevations to grade the colour treatment of the elevations across the site, and the addition of a roof terrace in Block D.

4.6 Following these changes Camden Council has confirmed the design of the scheme is acceptable in principle.

4.7 All other application documents including the Energy Statement and Transport Statement have been updated to respond to the comments provided by the GLA

at pre-application stage and the additional information requested has been provided where necessary.

London Borough of Camden

4.8 Meetings have been held with officers of the London Borough of Camden on a number of occasions commencing in August 2010. At this initial meeting officers recognised the importance of higher education institutions and the need for additional student accommodation in London. The role that Travis Perkins play in supporting the construction industry in Camden was also acknowledged by officers. The scheme has continued to evolve directly as a result of these discussions.

4.9 Concurrent to the meetings with Development Control and Policy Officers additional meetings were held with the Council's Design and Conservation Officer to refine the design of the scheme. The iterations of the design of the scheme and evolution of the proposals in line with advice provided at these meetings is detailed fully in the Design and Access Statement.

Local Members

4.10 UNITE has engaged with the Members of the St Pancras and Somers Town ward, the Local MP and Members of the Development Control and Regeneration Committee.

4.11 Meetings were held with Local Members in November 2010 and again in February 2011. At these meetings the Councillors confirmed they were supportive of the proposal to redevelop the site for continued use by Travis Perkins with student accommodation above.

4.12 Further details are provided in Section 5.3 of the Community Consultation Statement.

Public Consultation

- 4.13 Leaflets notifying local residents of the application proposals were delivered to more than 1000 households in March 2011. The leaflets also advised residents of a public exhibition taking place on 23rd March 2011.
- 4.14 The exhibition was attended by 23 people. Members of the project team were available answer any questions which arose during the event. Of these people 16 chose to submit written comments, which are largely positive. Further details of the comments are outlined in Section 5.2 of the Statement of Community Consultation.

Local Businesses and Organisations

- 4.15 UNITE and Travis Perkins has actively engaged with local businesses and organisations in the area including St Mungo's and the Royal Veterinary College.
- 4.16 St Mungo's and the Royal Veterinary College are adjacent to the application site and discussions therefore commenced at a very early stage in the production of the development proposals in August 2010 to ensure no adverse impact to either party.
- 4.17 In response to comments made by St Mungo's the design of the development has been revised to ensure no overlooking will result. In addition, to ensure continued links between UNITE and St Mungo's volunteering opportunities for the future student residents of the site are also being explored.
- 4.18 Discussions to explore links with the Royal Veterinary College are on going.

Conclusions on Pre-application Consultation

- 4.19 UNITE and Travis Perkins have sought to undertake a wide and inclusive pre-application consultation with the local community and interested third parties. The outcome of the consultation made clear that there is a large amount of

support for the scheme from local councillors, local residents and community stakeholder groups. Where possible suggestions and comments have been considered and the scheme has evolved as a result.

- 4.20 UNITE and Travis Perkins continue to engage with the local community and seek to keep interested parties up to date with the progress of the scheme.

5.0 PLANNING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires any planning application to be determined in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan comprises the London Plan and the Camden Core Strategy and Development Policies DPD.
- 5.2 Other relevant planning policy guidance is set out in national policies statements and guidance documents. PPS1 Delivery Sustainable Development (2005), PPS3 Housing (2010) and PPG13 Transport (2011).
- 5.3 The draft Replacement London Plan is also of relevance alongside other emerging Local Development Framework documents including the Site Allocations DPD.
- 5.4 This statement will now assess the principle and need for student accommodation and an assessment of proposals against the relevant adopted planning policies.

6.0 PLANNING ASSESSMENT

6.1 This statement refers to the following principle planning issues raised by the proposals and demonstrates that these comply with the relevant development plan policies:

- i. Enhancement of Travis Perkins
- ii. Principle of student accommodation
- iii. Amenity of future occupants and neighbours
- iv. Urban design
- v. Energy and sustainability
- vi. Transport, servicing and parking
- vii. Accessibility

6.2 The overarching principles advocated in Policies CS1 of the Core Strategy requires that developments make the best use of their sites. The application site is well located and easily accessible by public transport and is, therefore, capable of accommodating a greater quantum of development than at present and make a more efficient use of the land. Policy CS1 also promotes the development of a mix of uses in easily accessible locations in the borough to ensure the most efficient use of land.

6.3 The Camden Development Policies DPD states at Paragraph 1.4 that Policy D1 helps deliver the objectives of Policy CS1 by setting out a detailed approach to mixed use developments. Policy DP1 requires the provision of mixed use developments in all parts of the borough, including a contribution towards housing.

6.4 As such, it is considered the application proposals are fully compliant with Policies CS1 and DP1 and meet Camden's overarching objectives for development in the Borough.

6.5 Each of the matters identified in Paragraph 6.1 above will now be addressed in turn below.

i. Enhancement of Travis Perkins

- 6.6 Travis Perkins is an important employer in Camden and provides a supporting service for the central London construction industry. This was recognised by Camden early on in pre-application discussions.
- 6.7 Travis Perkins intend to relocate nearby to the application site during construction to ensure the business retains presence in the area and continues to service the construction industry.
- 6.8 As discussed in Section 2.0 above and in more detail below the existing Travis Perkins facilities on site are not built for purpose as they were formerly a BRS maintenance depot and are now outdated. The redevelopment of the site provides the opportunity to create accommodation that meets the requirements of the business and allows the company to operate efficiently from the site.
- 6.9 This section of this statement now goes on to demonstrate the redevelopment and enhance of the Travis Perkins operation on site is in compliance with relevant planning policy.

Compliance with Development Policy DP13

- 6.10 Policy DP 13 states that where sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:
- (c) the level of employment floorspace is maintained or increased;
 - (d) they include other priority uses such as housing and affordable housing;
 - (e) premises suitable for new, small or medium enterprises are provided;
 - (f) floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for

these uses or for offices in premises that are suitable for other business uses;

- (g) the proposed non-employment uses will not prejudice continued industrial use in the surrounding area.

6.11 To demonstrate compliance with Policy DP13 each of the above criteria will be addressed in turn below.

(c) the level of employment floorspace is maintained or increased

6.12 A key objective of the application proposals is to ensure the redevelopment of the site retains the amount employment floorspace currently available to Travis Perkins.

6.13 The redevelopment of the existing floorspace will provide purpose-built accommodation for Travis Perkins to ensure the most efficient use of the space is achieved.

6.14 The current configuration of the existing Travis Perkins facility suffers from a number of drawbacks which significantly curtail the operation on the site, including:

- age of facility;
- poor circulation space;
- inefficient storage areas;
- unsafe and uncomfortable working conditions;
- limited sales space;
- inadequate site entrance and exit resulting in very early morning deliveries before the branch opens to customers; and
- open servicing and circulation areas which conflict with the adjoining residential use.

6.15 The redevelopment proposals have been designed so as to overcome all of the above issues to ensure the accommodation meets all the needs of Travis Perkins to ensure the company can operate efficiently on the site.

(d) they include other priority uses, such as housing and affordable housing

6.16 Our position on this point is straightforward. First, the inclusion of the term "such as" means a wider range of alternative uses are appropriate. Secondly, notwithstanding this, the provision of student accommodation is a form of housing. Student housing is explicitly recognised as a form of housing as set out at Paragraph 6.5 of the Core Strategy which lists the various forms of housing. The GLA pre-application advice letter confirms the site is "more appropriate" as a student location.

6.17 This is a fact explicitly recognised in the recent Belmont Road appeal decision (LPA Application Reference - 2009/4257/P, PINS Ref - 2131137, **Appendix 4**). The Inspector concluded at Paragraph 17 that *'I understand the concern to maintain a balance between new self-contained and student housing, but the LDF does not exclude student housing when it describes housing as a priority use.'*

6.18 This approach is supported by Paragraph 39 of the Walworth Road, Southwark appeal decision (**Appendix 5**) in which the Inspector concluded that *'I consider that the new student housing would provide new homes, a residential use, albeit for a specialised group.'* The appeal proposals at this site comprised commercial floorspace at ground floor level with 232 student accommodation units on the floors above. Indeed, the Inspector goes on to set out in her decision at paragraph 45 that *'the proposed development would contribute to achieving a vibrant integrated mix of uses, including homes, albeit for students.'*

(e) premises suitable for new, small or medium enterprises are provided

6.19 The starting point for the redevelopment proposals has always been the need to deliver the business objectives of Travis Perkins and provide effective purpose-

built accommodation. The new proposals have been designed by Travis Perkins to ensure an efficient and operationally sound bespoke floorspace for the long term. Key features include:

- i. the provision of a covered one way access road through the site to avoid large articulated vehicles reversing into St Pancras Way, avoiding noise, vehicular and pedestrian traffic disruption;
- ii. dedicated, fully enclosed loading bays for large vehicles to avoid conflicts within the circulation areas;
- iii. dedicated, customer pick-up and drive through areas;
- iv. a distinct and well identified show room and offices;
- v. well laid out areas of storage which are overlooked from the office areas and which increases the storage capacity at the site.

6.20 It has been recognised by officers throughout pre-application discussions that Travis Perkins is a significant contributor to Camden's economy and is also an important source of employment. In addition, the role of Travis Perkins in supporting a large number of development sites in the Borough, including the Kings Cross redevelopment has also been fully acknowledged by the Local Planning Authority.

6.21 The sub text to Policy DP13 on page 57 defines small businesses as those employing less than 50 people and medium sized enterprises as employing less than 250 people.

6.22 Purpose built accommodation will enable the Travis Perkins branch to become more efficient and potentially reclaim and enhance business which is expected to result in a direct increase of employees with additional employment opportunities created off site. The application scheme has been developed with the involvement of Travis Perkins throughout to guarantee the new facility will meet the company's requirements exactly and to ensure Camden's construction industry continues to be supported. The application proposals are therefore in line with the requirements set out in the supporting text to Policy DP13 at

Paragraph 13.6 that it must be demonstrated that the accommodation is appropriate for the end user.

(f) floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses

6.23 As set out above, Travis Perkins is a key contributor to the construction industry in Camden and intends to remain so. As such, the continued use of the site by Travis Perkins has been encouraged by officers and the employment floorspace is adequately re-provided by the application scheme thus complying with the requirements of part (f) of Policy DP13.

(g) the proposed non-employment uses will not prejudice continued industrial use in the surrounding area

6.24 As set out in the accompanying Design and Access Statement the scheme has been developed taking full account of the context of the area to ensure the proposals integrate successfully with the existing uses and built environment.

6.25 Taking account of the above considerations it is considered the redevelopment of the site to provide the enhancement is fully compliant with current development plan policies.

ii. Principle of Student Accommodation

Overarching Need for Additional Student Accommodation in London

6.26 There is a clear need for additional student accommodation in the capital and particularly so in Camden. Savills' recent research into the student housing market, 'Spotlight on Student Housing' (June 2010) identifies that there has been an increase of 35% in the number of full time students in the capital in the last 10 years and this growth is set to continue with a further 35% growth

expected in the next 10 years. A copy of the research is provided at **Appendix 6**.

- 6.27 The research found that despite the high level of growth of the student population in London in recent years new student bed spaces were being delivered at a rate of just one new bedspace per eight new additional full time students during 2009.
- 6.28 The need for additional student accommodation is also recognised by higher education institutions in Camden as set out in the Student Housing in Camden study. Paragraph 3.1 of the study sets out the views of institutions in the Borough and states that "*student accommodation available at each university is grossly inadequate to meet the demand.*"
- 6.29 In support of the development proposals a Needs Assessment produced by Savills clearly identifies a need for student accommodation both in London and more specifically in Camden.
- 6.30 The emerging non-self contained housing targets for London are set out at Annex 4 of the Draft Replacement London Plan with a provision of 100 non-self contained units specified for the London Borough of Camden. Analysis of the available annual monitoring reports for the Borough in respect of non-self contained housing indicates that whilst the target for 2008/2009 was exceeded the provision on non-self contained units in the previous years was below the 100 units required per year. In 2007/08 only 21 units were provided with a loss of 170 units being recorded in 2006/2007. The most recent Annual Monitoring report published in December 2010 confirms the delivery of only 46 units in 2009/2010.
- 6.31 The information available demonstrates that between the years of 2006 and 2010 377 additional self contained units were provided, therefore falling short of Camden's required provision of non-self contained housing by 23 units.
- 6.32 Table 2-1 of the Student Housing in Camden study sets out the growth in the number of students in the Borough between 2001/02 and 2008/08. The number

of students in the Borough increased by 16% or 7,705, the equivalent of an average of 1,284 students per year. There is a clear difference between the number of non-self contained units delivered in the Borough at this time, 377 units compared to 5,136 additional students within the three years.

- 6.33 As set out above and demonstrated by the report produced by Savills there is a clear need for student accommodation in the Borough. It has been recognised on a number of occasions that given that London wide targets for non-self contained housing are determined by the historical take up of purpose-built student accommodation the figures do not represent a realistic target for *future* provision. The Mayor's Housing Technical Note (August 2010) confirms that the figures are arrived at through the analysis of historical take up of the proportion of students living in purpose-built student accommodation. The appeal decision in respect of a student accommodation scheme at 120-138 Walworth Road dated July 2010 (PINS Ref: APP/A5840/A/09/2114290 - **Appendix 5**) is clear at paragraph 20 that *'the London Plan monitoring of non-self contained housing as a component of overall housing is simply that, as such I do not consider it should be used as a target.'*
- 6.34 Whilst the approach to defining the target for non-self housing provision is not necessarily agreed with, the provision nonetheless forms part of the Borough's overall housing target alongside self-contained dwellings as recognised in Annex 4 of the emerging London Plan.
- 6.35 It is clearly recognised in Paragraph 24 of the appeal decision in respect the Greenheath Business Centre in Tower Hamlets (Appeal ref APP/E5900/8A/08/2077312 provided at **Appendix 7**) that a contribution the borough has already made to providing purpose-built accommodation should not stifle future provision:

'The Borough makes by far the highest contribution to the supply of purpose-built accommodation for students in the North East sector of London, there being 3866 bedspaces according to the Report by Savills on the Student Accommodation Market in London which accompanied the planning application. This equates to 61% of the total in this part of London, Schemes for a further 2238 bedspaces have been permitted,

Impressive though this record is, it is no justification of itself for refusing to permit yet more purpose-built accommodation in the Borough,'

Ability of UNITE to Meet this Demand

- 6.36 The GLA is clear in its recognition that dedicated student accommodation developers and operators are in effect equivalent to university accommodation departments in that they are able to safeguard the accommodation for use by students only. Paragraph 23 of the GLA Stage 1 report (**Appendix 8**) in respect of the 'Moonraker' scheme in Southwark sets out the position of the GLA. This is further confirmed at Paragraph 37 the Committee Report for the scheme (**Appendix 9**).
- 6.37 The Stage 1 report clearly sets out that the GLA recognises that specialist student accommodation operators have the experience and skills to not only offer the rooms but manage the accommodation within a community.
- 6.38 The key policies governing the proposed redevelopment of the Travis Perkins site for continued employment use alongside the introduction of student accommodation will be assessed below.

Support for Student Accommodation in the Regional Planning Guidance

- 6.39 Policy 3A.25 of the approved London Plan supports the provision of student accommodation in the capital and recognises the need to maintain London's reputation of excellence in higher education. The policy goes on to set out that the Mayor will work with local planning authorities and higher education institutions to ensure that the needs of the sector are met. In addition, Paragraph 3.118 of the London Plan sets out the intention to expand higher education institutions.
- 6.40 The Draft Replacement London Plan requires at Paragraph 3.45 that student accommodation is robustly secured for use by students. It recognises this can potentially include those schemes delivered by a recognised student accommodation provider, such as UNITE, secured via a Section 106 Agreement.

- 6.41 This is supported by the draft GLA Housing SPD dated September 2010. The section on Planning for Higher and Further Education states that the ability to provide ancillary services (including student accommodation) is essential for an effective Higher and Further Education offer.

Compliance with Core Strategy Policy CS6

- 6.42 Policy CS6 of the Core Strategy sets out that student accommodation will be supported in the Borough provided the following key criteria are not prejudiced:

- a) the ability of the Council to meet the target for the supply of additional self contained homes;
- b) the balance of the uses in the area; and
- c) the quality of residential amenity or the character of the surrounding area

- 6.43 Each of the criteria set down by Policy CS6 will now be addressed in turn.

- (a) the ability of the Council to meet the target for the supply of additional self contained homes*

- 6.44 The London Borough of Camden has successfully exceeded its housing targets as set by the London Plan and Core Strategy, for a number of years and is on target to continue to throughout the Core Strategy plan period.

- 6.45 This was accepted by both the Local Planning Authority and Inspector during the appeal at Blackburn Road (LPA Application Reference - 2009/5823/P, PINS Reference - 2127151). Paragraph 10 onwards of the appeal decision deals with this matter and recognises that the Borough has met its housing targets for the last seven years. A copy of the appeal decision is provided at **Appendix 10**. In addition, it is recognised in the decision that the Council have the ability to meet the housing target for the entire plan period from allocated and emerging sites. The Travis Perkins site is not currently allocated and has not been considered for inclusion in the Council's site allocations document.

- 6.46 In the recent appeal decision in relation to 10 and 10a Belmont Street (LPA Application Reference - 2009/4257/P, PINS Reference - 2131137, **Appendix 4**) the Inspector determines at Paragraph 16 that the application proposals will not prejudice the Council's ability to provide self contained market housing in the Borough, as follows:

'Paragraph 6.13 of the Core Strategy refers to managing the development of student housing so that it does not prejudice the achievement of other housing needs. Planning permission has been granted in the Borough for over 2,000 new student bedspaces in the last four years. However, there is no evidence that the appeal site would be developed for self contained housing including affordable housing, if the current appeal were to fail. Also, the Council's targets for new self-contained homes are not at risk.'

- 6.47 Camden's latest Annual Monitoring Report (2008/2009) sets out that sufficient sites have been identified to easily exceed the housing targets for the Borough. This is a fact also recognised at Paragraph 1.7 of the Core Strategy which states that a total of 815 homes are expected to be delivered per year between 2010/11 and 2024/25, *'which comfortably exceeds Camden's current London Plan target.'* The Core Strategy goes on to state that *'this means we can meet our housing targets even if some identified sites do not come forward for development as envisaged.'*
- 6.48 In addition to those sites already identified that are capable of meeting the Borough's housing targets, further sites emerged in December 2010 and were subject to consultation at the end of 2010, thereby adding further to the Borough's housing land supply. Allocated sites nearby to the development site are illustrated on the context plan at **Appendix 3**.
- 6.49 The introduction of purpose built student accommodation can assist in freeing up self-contained housing for general needs. This was accepted by planning officers during pre-application discussions. This is also established at Paragraph 9.11 of the supporting text to Development Policy DP9. In addition, Paragraph 3.39 of the London Plan explicitly recognises that purpose-built student accommodation

in fact frees up provision of market housing currently occupied by students, thereby adding to the overall supply of housing.

6.50 Table 2-2 of the 'Student Housing in Camden' LDF evidence document suggests only 30% of full time students in the Borough live in dedicated student accommodation. Figure 2-3 of the study suggests the number of students living in 'other accommodation' in St Pancras and Somers Town is even higher at up to 75%. However, research undertaken by Savills in support of the redevelopment of the site determines that only up to 16.7% of students in the Borough are currently living in purpose built student accommodation. There is, therefore, a significant number of students living in 'other accommodation' including in self contained market housing and HMOs.

6.51 In any event, it is considered that student accommodation is a form of specialised housing which contributes to the Council's overall housing stock. This is explicitly recognised at Paragraph 20 of the Walworth Road appeal decision (PINS Reference - 2114290, **Appendix 5**). The Inspector recognises that:

'the contribution that non-self contained housing makes to the overall housing provision is important and in this context I have no doubt that non-self contained housing, including that occupied by students, provides homes. Other documentation, for instance the Mayor of London's Housing SPG, also confirms the contribution that non-self contained accommodation makes to housing targets.'

6.52 In light of the above it is considered the ability of the Local Planning Authority to continue to meet its housing target is unaffected by these application proposals. In this respect the redevelopment of 11-13 St Pancras Way as proposed is therefore, compliant with Policy CS6.

6.53 To conclude on this point, it is considered the application proposals will not prejudice the Council's ability to meet its housing targets for the following reasons:

- Evidence demonstrates the Borough's housing targets have been exceeded for a number of years and sufficiently housing land has been identified to continue to do so for the remainder of the plan period;
- Purpose-built student accommodation will free up market housing and HMOs currently in use by students to be free up for general use thereby reintroducing the housing back into the Borough's housing stock;
- A significant need for student accommodation has been identified;
- The application site is not allocated or even considered for allocation and no other allocated sites are affected by the application proposals; and
- Student accommodation is a recognised form of specialist housing in any event and contributes to the Council's overall housing stock.

(b) The balance of the uses in the area

6.54 The application site undoubtedly forms part of a wider mixed use area. There does not appear to be one dominant established use in the area. This is illustrated by the context plan provided at **Appendix 3**. In terms of adjoining uses, this currently includes:

- A. The Royal Veterinary College which runs along the site's west boundary;
- B. A block of residential accommodation to the north west, with UNITE's Beaumont Court development further north on the immediate opposite side of the access road;
- C. Beyond this is a Royal Mail Depot, whilst on the opposite side of St. Pancras Way is a whole series of new, predominantly residential, developments;
- D. to the east on the opposite side of St. Pancras Way, is a large office and warehouse building occupied by Ted Baker;

- E. to the south east of this is Camden & Islington Mental Health site;
 - F. to the direct south of the site is the St. Mungos building, with a new residential scheme directly adjoining.
- 6.55 The emerging Site Specific Allocations document clearly envisages change in the area with 3 substantial sites allocated for housing led redevelopment, including: the Royal Mail and Camden & Islington Mental Health Hospital sites on St. Pancras Way; and the sub station site between Pratt Street and Georgiana Street. Collectively these sites comprise approximately 4 hectares which, if redeveloped conservatively at 250 dwellings per hectare, will yield 1000 dwellings.
- 6.56 The mixed use nature of the area was also explicitly recognised by the Inspector in his report at Paragraph 16 in respect of 1-5 St Pancras Way (Appeal reference APP/X5210/A/07/2056918, **Appendix 11**).
- 6.57 In addition, it should be recognised that student populations do bring a number of benefits to the areas in which they are located. These benefits should not be overlooked when assessing the impact of the scheme on the balance of uses in the area.
- 6.58 Research undertaken by Universities UK - 'Studentification: a guide to opportunities, challenges and practice' assesses the impact of student populations on existing communities. It is established that on balance the advantages of increasing numbers of students provides a number of broad and wide reaching benefits. The positive effects of student populations are summarised at **Appendix 12**.
- 6.59 The facilities that will be provided in the scheme will also serve to benefit the wider community and have the potential to be used for voluntary work, community meetings and those at St Mungos. Discussions are also underway with the Royal Veterinary College to establish arrangements for sharing the communal areas of the proposed development.

- 6.60 The Belmont Street appeal decision (**Appendix 4**) provides a helpful assessment of the Council's requirement to maintain a balance of uses at Paragraph 17, as follows:

'Paragraph 13.6 of the Development Policies DPD describes the Council's support for redevelopment which maintains employment floorspace and provides other priority uses such as housing. I understand the concern to maintain a balance between new self contained and student housing, but the LDF does not exclude student housing when it describes housing as a priority use.'

- 6.61 In light of the above, it is considered the application proposals will complement the mix of uses currently present in the area and will contribute towards creating a mixed and inclusive community.

(c) *The quality of residential amenity or the character of the surrounding area*

- 6.62 As recognised in the 'Studentification' research student populations can bring about many benefits, as discussed at Paragraph 3.14 above and set out at **Appendix 12**.

- 6.63 In addition, in the Blackburn Road case (PINS Appeal Reference - APP/X5210/A/10/2127151, **Appendix 10**) the Inspector recognised at Paragraph 16 of his decision that student concentration could result in a demand for certain retail and cultural facilities and the new building would result in the physical upgrading of the environment. The development would, therefore, enhance the amenity for existing residents of the area establish new and improved services for those living there.

- 6.64 It is set out at paragraph 3.3 of the Studentification report that the negative impacts of student accommodation tend to be narrow and clearly definable. The less desirable aspects of student populations are often only perceived and unfairly amplified.

- 6.65 The impact of student populations on local communities has been assessed by Inspectors on a number of occasions. To provide one such example, in the Stockbridge Road, Chichester appeal (PINS ref - APP/L3815/A/09/2116026, **Appendix 13**) the Inspector countered the assertion that students are habitually unruly, as follows:

'the concern expressed by the Council and third parties relates to the assertion that the proposed development, owing to its specific use and the number of students to be housed on the appeal site, would give rise to the loss of amenity to the occupiers of nearby residential development, particularly in respect of noise and disturbance. This is an assertion unfounded by evidence and apparently based on the general stance taken by many people that students are habitually unruly. That is a sweeping approach to the matter that needs to be tempered by the realisation that any section of society may include a disorderly element.'

- 6.66 UNITE are proactive and experienced in their management of students residing in their accommodation.

- 6.67 Indeed, taking account of the Inspector's comments made at Paragraph 26 of the Greenheath Business Park appeal decision (**Appendix 7**) UNITE's ability to manage the students at their developments is not in question, as follows:

'The evidence persuades me that UNITE takes seriously its obligations to both its students and to local residents and that it would use its reasonable endeavours to ensure that students acted at all times in a fitting manner.'

- 6.68 All of UNITE's developments benefit from a Residence Manager and additional management staff to ensure the housing operates successfully. The key messages of UNITE's Management Plan are as follows:

'The Residence will be managed to create a safe, clean, well run environment for its occupants, which respects their need for privacy and study.'

'The Residence and its occupants acknowledge and respect the rights of adjoining residents and businesses to a quiet life and will work to ensure these rights are not compromised by their actions.'

- 6.69 In comparison to other forms of student accommodation in the Borough, such as HMOs, purpose-built student accommodation provides an opportunity to actively manage students in one place as recommended by the guidance set out in the Studentification research.
- 6.70 Purpose-built accommodation also allows the needs of students to be accommodated on site, such as dedicated study spaces, internet access and common rooms.

Compliance with Development Policy DP9

- 6.71 Core Strategy Policy CS6 is supplemented by Policy DP9 of the Development Policies DPD which sets out a number of factors that the Council will take into account when assessing schemes for student accommodation, including:
- a) Will not involve the loss of permanent self-contained homes;
 - b) Will not prejudice the supply of land for self-contained homes, or the Council's ability to meet the annual target of 437 additional self-contained homes per year;
 - c) Does not involve the loss of sites or parts of sites considered particularly suitable for affordable housing or housing for older people or for vulnerable people, particularly sites identified for such provision in our Camden Site Allocations Local Development Framework document;
 - d) Complies with any relevant standards for houses in multiple occupation;

- e) Will be accessible to public transport, workplaces, shops, services and community facilities;
- f) Contributes to creating a mixed and inclusive community, and
- g) Does not create an over concentration of such a use in the local area or cause harm to residential amenity or the surrounding area.

6.72 Policy DP9 goes on to state that student housing development should:

- h) Serve higher education institutions based in Camden or adjoining boroughs;
- i) Be located where it is accessible to the institutions it will serve; and
- j) Include a range of flat layouts including flats with shared facilities.

6.73 Each of the above criteria will be addressed in turn below.

(a) Will not involve the loss of any self contained homes

6.74 There are currently no self contained homes on the site. The application proposals will, therefore, not result in the loss of any self contained residential units.

(b) Will not prejudice the supply of land for self-contained homes, of the Council's ability to meet the annual target of 437 additional self-contained homes per year

6.75 This is fully addressed in Section 4.0 above. It is concluded that the evidence demonstrates that the Borough's housing targets have been exceeded for a number of years and sufficient housing land has been identified to continue to do so for the remainder of the plan period.

6.76 In addition, purpose-built student accommodation will free up market housing and HMOs currently in use by students for general use thereby reintroducing the units back into the Borough's housing stock.

6.77 Further, the application site is not allocated or even considered for allocation and no other allocated sites are affected by the application proposals and finally student accommodation is a recognised form of specialist housing in any event and contributes to the Council's overall housing stock.

(c) Does not involve the loss of sites or parts of sites considered particularly suitable for affordable housing or housing for older people or for vulnerable people, particularly sites identified for such provision on our Camden Site Allocations Local Development Framework document

6.78 Notwithstanding the fact the site has been earmarked by Travis Perkins for redevelopment for some time, the application site was not allocated in the previous Unitary Development Plan for housing. Furthermore, it has not been identified in the emerging Site Allocations DPD as being suitable for housing. It is clear therefore that the development proposals do not prejudice the redevelopment of any allocated sites within the Borough.

6.79 Paragraph 2.3 of the report into the draft supplementary Site Allocation Document to the 20th October Cabinet Meeting (**Appendix 14**) sets out that whilst there are many sites that could potentially be included in the document it is those that most likely to make a contribution to the strategic objectives and targets of the Core Strategy that have been identified in the emerging document.

(d) Complies with any relevant standards for houses in multiple occupation (HMO)

6.80 The supporting text to Policy DP9 at Paragraph 9.8 requires all student accommodation to be developed in accordance with the Housing Act 2004 which sets out the minimum standards for houses in multiple occupation.

6.81 Increasingly high standards of accommodation are sought by students and as such the scheme will be developed to meet these requirements.

6.82 Indeed, it is recognised at Paragraph 23 of the appeal decision (PINS Ref - APP/E5900/A/08/2077312 - **Appendix 7**) in respect of a purpose-built student accommodation scheme at Greenheath Business centre in Tower Hamlets that *'the accommodation provided would assist the students in their studies by being of good quality and better suited to its purpose than might be the case with Houses in Multiple Occupation.'*

(e) Will be accessible to public transport, workplaces, shops, services and community facilities

6.83 The Transport Assessment accompanying the application provides a comprehensive assessment of the accessibility of the site. This demonstrates the application site is easily accessible by a number of public transport options including various bus routes. In addition, Camden Road, Camden Town, Mornington Crescent and Kings Cross stations are all located less than 10 minutes walk from the site. Nearby Camden High Street offers a number of facilities and services including shops, restaurants, banks and cinema.

(f) Contributes to creating a mixed and inclusive community

6.84 As set out above, the application site forms part of a comprehensive mixed use area. The retention of the Travis Perkins facility and introduction of student accommodation on the site will act to complement the mix of uses already present in the area.

6.85 Discussions are underway with the Royal Veterinary College to provide shared facilities at 11-13 St Pancras Way for use by those living at the scheme and students of the RVC. As set out above, the application scheme will provide two common rooms which will also be available for use by local groups, including those at St Mungos and the RVC.

6.86 The recent Blackburn Road appeal decision (PINS Reference - APP/X5210/A/10/2127151) provides a helpful assessment of the application of the newly adopted Core Strategy and Development Management Policies relating to student accommodation. A copy of the appeal decision is provided at **Appendix 10**.

6.87 The concentration of student accommodation and whether the proposals would contribute to a sustainable, mixed and inclusive community was thoroughly examined by the Inspector. A number of the matters raised in the appeal decision will be discussed in more detail below however, the following summarises the key assertions are made by the Inspector in his decision:

- The London Borough of Camden's housing targets for self- contained housing have been met for the last seven years and the Council are on target to exceed housing target for the remainder of the Core Strategy plan period. The housing target for the Borough can be fully met from allocated and emerging sites.
- Substantial shortfall in student accommodation is evident in Camden and across London.
- Purpose-built student accommodation will assist in reducing the demand for self contained housing.
- Growing student populations can yield benefits for university towns and cities.
- No displacement of established residents will result as the proposals involve a new building.
- The Inspector concluded based on the above facts that the appeal scheme would make a positive contribution to a sustainable, mixed and inclusive community.

6.88 In conclusion, it is considered the application proposals will complement the existing mix of uses in the area and contribute towards existing community by providing shared facilities. As such the application scheme is compliant with criterion (f) of Development Policy DP9.

(g) Does not create an over concentration of such a use in the local area or cause harm to residential amenity or the surrounding area

- 6.89 In respect of creating an over concentration of student, the Council's draft supplementary planning document relating to Housing provides a map of the Borough highlighting areas of existing student accommodation concentration. A copy of this map can be found at **Appendix 15**. This map provides an up to date reflection of student accommodation in the Borough and includes existing halls of residents and approved permissions for student housing. As can be seen from the map the application site falls outside an area of existing student concentration.
- 6.90 The draft document sets out that the Council will consider, amongst other matters, the number of students as a proportion of the overall population when determining whether development proposals will result in over concentration.
- 6.91 Taking account of the figures set out at Appendix B to the draft SPD it is clear that St Pancras and Somers Town, the ward in which the application site can be found, has one of the lowest proportions of full time students in the Borough at only 5.10%. This is significantly lower when compared to other wards such as Kings Cross (22.97%) and Bloomsbury (25.38%).
- 6.92 In assessing the Blackburn Road appeal proposals the Inspector at Paragraph 15 took into account that there are many larger concentrations of students elsewhere in London.
- 6.93 The cumulative increase in student concentrations elsewhere in the Borough is evident and has been deemed to be found acceptable by the Local Planning Authority. Bearing in mind the Council's aim to avoid over concentration of student accommodation, the Sidmouth Street scheme, recommended for approval by officers, is located directly adjacent to William Goodenough House, purpose-built student accommodation. Permission to extend William Goodenough House has also recently been issued by the Local Planning Authority.

6.94 In light of the above, it is considered the application proposals will not lead to the over concentration of student accommodation in the local area and the requirements of criterion (g) of Development Policy DP9 are met.

(h) Serve higher education institutions based in Camden or adjoining boroughs

6.95 As identified below there are numerous higher education institutions within close walking distance of the application site.

6.96 As outlined at the outset of this statement there is also a significant gap between the number of students studying in London and the amount of accommodation available.

6.97 Discussions are underway with a number of higher education institutions, including the Royal Veterinary College, Kings College, London School of Economics, University College London, Birkbeck and Westminster.

6.98 As a result of these discussions, the University of Westminster has confirmed its support of the scheme (**Appendix 16**). The University of Westminster is currently unable to provide accommodation to all of the University's first year students either in university owned accommodation or that operated by specialist providers such as UNITE. As such, the provision of the additional purpose built student housing would assist in meeting the current demand for accommodation.

(i) Be located where it is accessible to the institutions it will serve

6.99 The site is also within walking distance of a number of higher education institutions. In addition to many other nearby institutions accessible by public transport, the following are all within a 20 minute walk of the site:

- Royal Veterinary College
- University College London
- Central St Martins

- Birkbeck College
- SOAS
- School of Pharmacy
- City University

6.100 The locations of nearby education facilities are illustrated on the context map provided within the Design and Access Statement.

(j) Include a range of flat layouts including flats with shared facilities

6.101 A comprehensive range of accommodation is proposed comprising 2-8 bed cluster flats and studios. The following mix of accommodation will be provided:

- 41 studio rooms
- 1 cluster flat with 2 bedrooms
- 13 cluster flats with 5 bedrooms
- 19 cluster flats with 6 bedrooms
- 26 cluster flats with 7 bedrooms
- 20 cluster flats with 8 bedrooms

6.102 Having considered the application proposals against the relevant planning policies it is demonstrated that the scheme is compliant with these policies and contributes towards meeting Camden's development objectives for the Borough.

iii. Amenity of Future Occupants and Neighbours

6.103 The application proposals have been carefully formulated so as to ensure the future amenity of both those living in the accommodation and neighbouring residents.

6.104 Policy DP26 of the Camden Development Policies DPD sets out the factors that will be considered when assessing the impact of development on occupiers and neighbours, as follows:

- a) visual privacy and overlooking;
- b) overshadowing and outlook;

- c) sunlight, daylight and artificial light levels;
- d) noise and vibration levels;
- e) odour, fumes and dust;
- f) microclimate;
- g) the inclusion of appropriate attenuation levels;
- h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
- i) facilities for the storage, recycling and disposal of waste;
- j) facilities for bicycle storage; and
- k) outdoor space for private or communal amenity space, wherever practical.

6.105 Each of the above considerations will be addressed in turn below to demonstrate compliance with Policy DP26.

(a) and (b) Visual Amenity, Overlooking, Overshadowing and Outlook

6.106 Paragraph 26.3 of the Development Policies DPD states that the Council will expect visual amenity, overlooking, overshadowing, outlook, access to daylight and sunlight to be considered at the initial design stage. As such, these considerations have formed an integral part of the design development of the scheme to ensure no impact on the future residents or those living adjacent to the site.

6.107 The Design and Access Statement provides further detail in Sections 3.0 and 4.0 of design context and site constraints that have been taken into account to ensure the proposals cause no harm to neighbours of the application site.

(c) Daylight and Sunlight

6.108 The acceptability of the scheme in terms of its impact on daylight and sunlight has also been fully assessed against the standards recommended in the BRE good practice guidance and as advocated at Paragraph 26.3 of the Development Policies DPD. The assessment undertaken by Delva Patman Associates

demonstrates that there is no harm to those living nearby to the site and the living standards for those living in the accommodation is acceptable.

- 6.109 The study recognises that the BRE guidance is not intended to be stringently applied and that each site should be assessed on its own merits taking into account its context. Delva Patman Associates conclude that daylight and sunlight to those living nearby to the site will not be adversely affected. The residential standards achieved for the future occupants of the development is also considered to be acceptable.

(d) Noise Impact

- 6.110 An assessment of the noise impact of the development on those living nearby the site has been provided by RBA Acoustics. The assessment has been carried out in line with the standards set out in PPG24 and Policy DP28 of the Camden Development Policies DPD. The concludes that the development scheme will continue to ensure a suitable quality of residential amenity for those living nearby the site and also for the future residents of the development.

(e) Air Quality

- 6.111 Taking account of the borough's status as an Air Quality Management Area an Air Quality Assessment has been carried out by WSP Environmental which considers the existing conditions and likely conditions following the construction of the scheme. The impact on air quality conditions during the construction of the scheme has also been considered. The assessment determines that through good site practice any impact will be negligible. In this respect the draft Construction Management Plan confirms UNITE's and Travis Perkins' commitment to comply with Camden's Considerate Contractors scheme.
- 6.112 In accordance with the requirements of Policy DP32 the assessment also confirms that acceptable levels of air quality can be achieved for the future residents of the development.

(g) Attenuation

- 6.113 The scheme has been designed so as to ensure Travis Perkins can effectively operate at ground floor level and acceptable living standards can be provided for the students on the floors above.
- 6.114 The student accommodation is to be constructed above a podium which will act to enclose and contain the builders merchant activities at ground floor level.
- 6.115 The supporting text to Policy DP28 at Paragraph 26.10 provides guidance on suitable attenuation methods including the compliance with an agreed Construction Management Plan. The Draft Construction Management Plan submitted in support of the application outlines the construction arrangements including development phasing and construction traffic arrangements. Compliance with the Construction Management Plan will be secured by S.106 Agreement which allows the Council effective control to manage the construction of the development and ensure the projection of the amenity of those living nearby to the site.
- 6.116 UNITE and Travis Perkins will also ensure compliance with Camden's Considerate Contractors Agreement during the construction of the scheme.
- 6.117 The modular method of construction will result in a large part of the development being constructed off site before being assembled in place. As a consequence, this will result in a significantly reduced construction programme and also fewer movements to and from the site by constructions vehicles.

(h) Standard of Accommodation

- 6.118 The proposed development will provide a good standard of accommodation suitable for student users. As discussed in Section 3.0 above the accommodation will be provided as a mix of studios and clusters of between 2 and 8 bedrooms.

- 6.119 Each unit has been carefully designed to ensure the students will have adequate space and amenities, in both common and private areas, to study and live.
- 6.120 Policy DP9 (d) requires that all student housing complies with standards for houses in multiple occupation. The proposed room sizes are as follows:
- Cluster room - 12.84 sqm
 - DDA room - 16.8 sqm
 - Studio - 27.04 sqm
 - DDA studio - 27.04 sqm
- 6.121 Having regard to Camden's minimum HMO standards adopted in November 2008 the proposed rooms sizes are significantly larger and therefore, compliant with Policy DP9. The rooms also compliant with the bedroom sizes set out at Paragraph 20.16 of the Camden Planning Guidance.
- 6.122 A total of 271 sqm of designated communal space is provided throughout the development comprising common rooms and study rooms. There are also large areas of communal landscaped space at podium and roof level for use by the students, the details of which are outlined below.
- 6.123 Two common rooms, totalling 197 sqm, are provided at podium level for recreational use, use as meeting rooms or for studying. Further details of the common rooms is provided in Section 6.0 of the Design and Access Statement.
- 6.124 Five study rooms are also to be provided and located on different floors throughout the scheme. These rooms will provide spaces for quiet studying and reading. The study rooms will also have desk space and connections to the internet for laptops.
- 6.125 We therefore consider that a high standard of student accommodation will be provided by UNITE at this site.

(i) Facilities for storage, recycling and disposal of waste

6.126 Each cluster flat and studio will have sufficient storage space for the storage of waste and recyclables. As outlined in Section 6.0 and illustrated on the application drawings a dedicated waste storage area will be provided adjacent to the student accommodation entrance. The bin store will be accessed from St Pancras Way to allow for easy collection.

(j) Facilities for bicycle storage

6.127 Space for a total of 300 bicycles is proposed, 282 for use by students and 18 for customers and employees of Travis Perkins. The provision is in accordance with the Council requirement of 1 space per 2 bedspaces.

6.128 The cycle storage will be provided in two locations. One smaller storage room at mezzanine level within the student accommodation entrance for 45 bicycles. This space will also be made accessible to visitors by a UNITE member of staff to allow those visiting the accommodation to store bicycles securely.

6.129 A larger storage space for 237 bicycles can be accessed from the landscaped podium. The bicycles can then be taken via a ramp through the entrance to the student accommodation to street level.

6.130 Cycle parking will be provided at ground floor level for customers and employees of Travis Perkins. On site showering facilities for employees is also proposed.

(k) Amenity space

6.131 The podium level has been designed to incorporate a number of areas of outside amenity space for use by the students living in the accommodation. These areas will serve different purposes as required by the students.

6.132 The primary amenity space accessed directly from the accommodation entrance will provide an area for meeting and socialising. A secondary space, beyond

Block D, which is more contained and private and will offer students a quiet area to sit and relax. The remainder of the podium is landscaped and provides smaller areas for students to sit and also to enhance the outlook for the students. In addition, a further amenity space is provided on the roof space of Block D.

- 6.133 In total 1,508 sqm of usable outdoor amenity space is provided for use by the students.
- 6.134 It is recognised that Policy CS15 requires the provision of 9 sqm of open space per student, however, as a result of the location of the development above a builders merchant it is not possible to provide all of this space on site.
- 6.135 The Camden Planning Guidance provides a method for calculating an appropriate payment in lieu of the provision of on site amenity space. This is discussed in more detail in Section 7.0 below.

v. Urban Design

- 6.136 The design of the application scheme has evolved as a result of detail discussions with design officers from Camden and the GLA. Comments made by members of the public and third parties during the pre-application community consultation have also been taken into account. Full details can be found in the Design and Access Statement and Statement of Community Consultation.
- 6.137 The context of the application site has also directly influenced the design of the scheme, particularly the height, massing and form of the building to ensure no adverse impact on neighbouring properties.
- 6.138 Achieving good design is clearly advocated in national policy, the London Plan and at the local level. Policy 7.1 of the draft Replacement London Plan requires that all new development has regard to its context. This is reflected in local policy in Policies CS14 and DP24 which promotes the creation of high quality places and design.

- 6.139 The site is not located within a designated viewing corridor or conservation, however, key local views to the site were also explored and discussed with Camden Council at an early stage to ensure the application proposals respond sensitively to their context.
- 6.140 The design of the scheme also responds effectively to the characteristics of the site, including long and narrow nature of the site.
- 6.141 The development proposals will significantly upgrade the street frontage on to St Pancras Way. The application site has a particularly long street frontage which currently largely comprises a 7m solid brick wall. The brick wall will be replaced by fencing to allow views into the site and to create an active frontage onto St Pancras Way.
- 6.142 The ground floor accommodation also includes a shop for use by Travis Perkins at the northern end of the site which will provide a further element of activity to the street frontage.
- 6.143 At the podium level the landscaping adds interest to the street and will be an area well used by students both to access the development and also as an area of outside amenity space.
- 6.144 The height of the proposed development has been agreed as acceptable by both Camden and the GLA during pre-application discussions.
- 6.145 As discussed in Section 4.0 further amendments to the design of the scheme have been made in response to the pre-application comments made by the GLA. The size of some of the windows have been increased to all elevations to add interest and variation. In addition, the treatment of the elevations has been varied to add further interest and provide a sense of definition between the blocks whilst ensuring the scheme remains viewed as a whole.
- 6.146 Following these final design alterations Design Officers at Camden Council have confirmed on 25th March 2011 they are happy with the design of the scheme in principle.

6.147 To conclude on design matters, UNITE and Travis Perkins have sought to actively engage with Camden, the GLA and the local community to evolve the design of the scheme. It is considered the application scheme is of a high quality design which responds well to its local context. The development will provide high quality student housing and purpose built accommodation for Travis Perkins to ensure the company can operate efficiently from the site.

vi. Energy and Sustainability

6.148 Policies CS13 and DP22 promote sustainable design and construction in all new developments in the Borough. Care has been taken to ensure the design of the scheme has evolved to incorporate sustainable credentials.

6.149 A shared CHP plant is proposed to generate heat and hot water. The use of the plant will assist in reducing CO2 emissions by 39.4% and thereby ensuring the scheme will be compliant with building regulations. The accompanying Energy Statement provides full details of the CHP plant demonstrating that the size of the plant is adequate to serve the development.

6.150 Our pre-application discussions with the GLA highlighted the potential for the site to be connected to a decentralised energy system in the future. There are two proposed energy networks within close proximity of the site. The Kings Cross energy scheme is located to the east of the station. Connecting to this scheme would, therefore, be technically difficult and financially unviable. A second energy scheme is located at Euston Road. The system is unlikely to be available for use for at least another three years and, therefore, a connection cannot be made at this time although provision will be made for a connection in the future.

6.151 As a result of the above, both elements of the development are graded 'excellent' when assessed against the BREEAM criteria. Green roofs are proposed throughout the scheme.

Vii. Transport, Servicing and Parking

- 6.152 As noted above the site is well located with good access to a number of public transport options including bus routes on St Pancras Way and Kings Cross Station. The site is also well linked by cycle routes. Further details can be found in Section 2.0 and the Transport Statement.
- 6.153 The redevelopment of the site will significantly improve the existing Travis Perkins servicing and delivery arrangements. Further details of these improvements can be found in the Design and Access Statement and Transport Statement.
- 6.154 The proposed builders merchant accommodation will allow all deliveries and collections to be undertaken within an covered space on the site and away from the road network. As a consequence the development will resolve any existing residential amenity issues and assist in alleviating congestion on St Pancras Way.
- 6.155 On site customer and employee parking spaces are incorporated at ground floor level. In addition, there are cycle spaces and showers provided for use by the employees of Travis Perkins.
- 6.156 The student accommodation is to be car free with the exception of the provision of one disabled parking space. The predominant method of travel to and from the accommodation by students is likely to be by bus, walking or cycling. As discussed above, 300 cycle spaces are proposed for use by students in accordance with Camden's current standards.
- 6.157 To conclude on this matter, the redevelopment of the site will enhance the residential amenity of those living nearby by providing purpose built accommodation allowing Travis Perkins to operate effectively without impacting on the local road network. In addition, taking account of the highly accessible location of the site, even considering the worse case scenario any trips generated by the development can be easily accommodated by the public transport system, as confirmed by the Transport Statement.

vii. Accessibility

- 6.158 London Plan Policy 3A.5 requires 10% of all new housing to be designed to be wheel chair accessible. At the local level, this requirement is reflected in Policy DP6.
- 6.159 The supporting text to Policy DP6 at Paragraph 6.2 recognises that as students will only occupy the accommodation for a limited time there is no requirement for student housing to meet lifetime homes standards.
- 6.160 UNITE currently only have one wheel chair user living in their entire portfolio of accommodation in London. In 2008/09 one accessible room was rented to a wheelchair user and another was rented to an able-bodied student. 87 accessible rooms remained unrented that year. Similarly, in 2009/10 one accessible room was let to a wheelchair use, one to an otherwise disabled user, 27 to able-bodied students and 67 rooms remained unrented.
- 6.161 It is clear from the evidence above that demand for accessible student accommodation is limited. Current supply far outweighs demand for accessible units to such an extent that even a significant increase in future take up of these units can be easily met. As such, it is proposed that 5%, or 28 student rooms are accessible.
- 6.162 Of the 5% accessible rooms 1% will be fitted out and the 4% of rooms readily available to be fitted out when needed. UNITE operate a policy that requires all students occupying accommodation to provide at least two weeks notice before moving into the housing. There is then sufficient time to allow for a room to be fitted out to meet the need of any particular student requiring an accessible room. This approach also allows the student moving into the housing to have a choice of rooms with the development rather than being directed to what is available at that time.
- 6.163 Taking account of UNITE's accessibility policy and the limited demand for accessible units by students it is considered the proposed number of accessible rooms is entirely acceptable.

7.0 DRAFT HEADS OF TERMS FOR SECTION 106 AGREEMENT

- 7.1 Pre-application discussions with Camden planning officers have confirmed that a number of obligations will be sought by the Council.
- 7.2 The Council's pre-application advice note issued in August 2010 and also Policy DP9 confirms that student accommodation developments will not be required to contribute towards affordable housing. As such, not contribution is offered in this instance.
- 7.3 UNITE Group Plc and Travis Perkins are happy to agree to the commitments and financial obligations outlined below.

Commitments

- Accommodation to be let only to students
- Car free housing
- Construction Management Plan
- Green Travel Plan
- Service Management Plan
- Sustainability Plan/BREEAM

Financial Obligations

Highway Works

- 7.4 A financial contribution towards highway works deemed necessary and reasonable in accordance with the tests contained within Circular 05/05 will be made by UNITE and Travis Perkins. Discussions will take place between the applicant and Camden Council to agree an appropriate payment during the application process.

Community Facilities

- 7.5 As discussed above the scheme will provide 297 sqm of communal space for use by the student comprising common rooms and study rooms located throughout the development.
- 7.6 A provision of at least 1m per student was indicated as being appropriate during pre-application discussions. Taking account of other recent applications in the borough and pre-application provided, a contribution of £495 per additional sqm required totalling £132,165 is proposed.
- 7.7 Discussions with both Ward Councillors and Camden's Regeneration Department have identified a number of schemes in the area to which the payment could assist in improving existing facilities in the local area.

Outside Amenity Space

- 7.8 Following the Council's calculator contained in the Camden Planning Guidance and pre-application advice provided it is understood 9 sqm of amenity space is required per student, therefore, totalling 5,076 sqm in this case. A payment of £55 per sqm of amenity in lieu of provision of the space on site is sought by the Council as set out in the Camden Planning Guidance. A financial payment towards the maintenance of the amenity space for five years is also sought.
- 7.9 The application scheme provides a total of 1,508 sqm of usable amenity space. As a result a payment £283,796.20 is proposed comprising £196,240 (£55 x 3,568 sqm) and £90,448.80 towards the future maintenance of the space.

8.0 CONCLUSIONS

- 8.1 The redevelopment scheme has been brought forward by Travis Perkins to create efficiently designed, purpose built accommodation for the company to secure the future operation of the business on the site. This will ensure Travis Perkins continues to provide important support to the construction industry in Camden, a benefit which has been widely recognised in our pre-application discussions.
- 8.2 Pursuing the redevelopment of the site as a joint venture with UNITE provides an opportunity to make the most efficient use of the land and contribute towards the Borough's sustainability objectives.
- 8.3 UNITE and Travis Perkins have actively sought to engage with Camden Council, the GLA and the Local Community throughout the evolution of the application scheme. The response to the pre-application consultation that has been undertaken has been largely positive. UNITE and Travis Perkins continue to engage with the local community.
- 8.4 There is a clear need for student accommodation throughout London and specifically within Camden. There continues to be a deficit in student housing, which is being outstripped by the growth in the number of students in the Borough.
- 8.5 The site is ideally located to provide student accommodation being easily accessible by public transport and within walking distance of a large number of higher education institutes.
- 8.6 It has been demonstrated that the proposals do not in any way prejudice the Council's ability to meet its target for the supply of additional self-contained homes. It is clear that student accommodation is a recognised specialist form of housing which contributes to the Council's overall housing supply in any event.
- 8.7 The uses proposed complement the variety of uses already found in the area as well as the uses emerging in draft planning policy documents. The area is

undoubtedly mixed use in nature and the redevelopment of 11-13 St Pancras Way will not adversely affect the balance of uses in the area. In addition, the site is not located within an area that is considered by the Council to currently be one of high concentration of student accommodation.

8.8 UNITE have an exemplary track record at developing and managing student accommodation in London and throughout the Country. It has also been demonstrated that there are a number of benefits of student populations which are often over looked.

8.9 As such, it is considered the redevelopment proposals are entirely compliant with adopted planning policy. The scheme would assist in meeting the significant shortfall of student accommodation in the Borough and would not in anyway prejudice the Council's ability to meet its self-contained housing targets. The redevelopment will also provide bespoke accommodation for Travis Perkins to ensure the business can remain competitive and secure its long term future on the site.