

Bangor Wharf
London Borough Camden
NW1 0QS

Planning Statement
Planning Portal Reference; PP-04813013
February 2016

PREPARED BY
Spenthorpe Ltd



Registered Address;

21 Elley Green

Wiltshire

SN13 9TX

T: 07557 155098

E: planning@spenthorpe.co.uk

W: www.spenthorpe.co.uk

Contents

		Page
1	INTRODUCTION & BACKGROUND	1
2	SITE AND SURROUNDING AREA	4
3	PLANNING HISTORY	7
4	PRE-APPLICAION CONSULTATION	9
5	APPLICATION PROPOSAL	16
6	PLANNING POLICY ASSESSMENT	21
7	SUMMARY & CONCLUSIONS	39

Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by a Business or Associate Director.

DATE

ORIGINATORS



24.02.16

Chris Pittock
Planning Director

Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of Spenthorpe; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned

1. INTRODUCTION & BACKGROUND

Introduction

- 1.1 This Statement has been prepared by Spenthorpe on behalf of One Housing Group in support of an application for Full Planning Permission and Conservation Area Consent in respect of the demolition and redevelopment of the site at Bangor Wharf, Georgiana Street, London Borough of Camden (hereafter referred to as 'the site'). The description of development is as follows;

"Redevelopment of site to create a residential-led mixed-use development comprising 46 residential units (Use Class C3) (18 x 1 bed, 19 x 2 bed and 9 x 3 bed), new office floorspace, measuring 686 sq.m (Use Class B1a) with associated highways works and landscaping following demolition of existing buildings".

Background

- 1.1 The application site consists of a corner plot between the junction of Georgiana Street and the Regents Canal, located within the Regents Canal Conservation Area. The site measures 0.18 hectares and comprises single and two storey office and storage buildings (Use class B1a and B8), a yard and vehicle parking. Previously the site was used by EDF Energy as a depot for the storage of materials with ancillary offices. However, it is understood they vacated the premises during October 2015 due to the poor standard of accommodation and the fact the site no longer met their operational requirements.
- 1.2 The buildings on site are of poor appearance and generally of lower density than those in the surrounding area. This is recognised through the Regents Canal Conservation Area Statement which explains, *'the current use, with its associated buildings and boundary treatment, detract from the character of the conservation area'*. Accordingly, it is identified, *'as a site with opportunities for enhancement'* and within the Council's Site Allocations DPD (Page 35), *'as providing an opportunity for intensification through redevelopment to provide a residential-led mixed-use development'*.
- 1.3 The application proposal responds positively to the opportunities identified by the Council through the removal of the existing buildings and replacement with a high quality scheme that enhances the character and appearance of the area whilst at the same intensifying an under utilised site to deliver much needed housing, including affordable and replacement employment floorspace.

- 1.4 In developing the scheme, pre-application discussions have been held over a period of 12 months with Officers of the Council, including representatives from Planning, Highways, Housing, Design and Conservation. Extensive consultation has also been undertaken with local politicians and residents through a range of means including exhibition events, meetings and written correspondence. The application proposal has therefore been subject to, and reflects, extensive consultation undertaken with the community. Further information regarding the consultation exercise undertaken pursuant to the proposal is set out within **Section 4** of this Statement and within the submitted Statement of Community Involvement.

Statement Structure

- 1.5 The purpose of this Statement is to describe the application site and proposed development, establish the relevant planning policy context and identify the principal planning matters relevant to the determination of the proposal.
- 1.6 A description of the key characteristics of the application site and surrounding area is set out within **Section 2**. The relevant planning history is provided within **Section 3** with an overview of the consultation exercise undertaken contained within **Section 4**. **Section 5** describes the application proposal and **Section 6** provides an assessment against the relevant features of planning policy. Finally, **Section 7** provides a summary and conclusion in respect of the application proposal.
- 1.7 The scope and format of the submission meets the requirements agreed with Officers during pre-application discussions and comprises an electronic submission by way of the planning portal and 1 no. hardcopy of the following documents;
- Applications form, including completed Ownership and Article 12 Agricultural Holdings Certificates;
 - The requisite application fee of £21,560;
 - Site location plan which identifies the land to which the application relates drawn to an identified scale and showing the direction of North;
 - CIL forms;
 - Planning Application Drawings, prepared by TM Architects;
 - Design and Access Statement, prepared by TM Architects;
 - Heritage and Townscape Appraisal, prepared by Kevin Murphy Associates;
 - Transport Statement and Travel, prepared by Vectos;
 - Daylight & Sunlight Assessment, prepared by CHP Surveyors;

- Preliminary Ecological Assessment, prepared by Wardell Armstrong;
- Arboricultural Implications Assessment, prepared by Broad Oak Tree Consultants;
- Statement of Community Involvement, prepared by Curtin & Co;
- Flood Risk Assessment & Sustainable Drainage Strategy, prepared by Conisbee;
- Environmental Noise & Vibration Assessment Planning Report, prepared by Sharpes Redmore;
- Verified Views, prepared by Soluis;
- Ground Investigation report incorporating Land Contamination Report, prepared by GEA;
- Affordable Housing Statement, prepared by GL Hearn;
- Air Quality Assessment, prepared by Mayer Brown;
- Energy & Sustainability Assessment, Couch Perry Wilkes;
- Planning Statement, prepared by Spenthorpe Ltd; and
- Viability Assessment, prepared by BNP Paribas.

1.8 In conclusion, the application proposal provides an important opportunity to secure improvements to the character and appearance of the site and Regents Canal Conservation Area through the removal of the existing buildings and replacement with a high-quality scheme. The intensification of this under utilised site facilitates the delivery of much needed housing, including affordable housing and new and improved employment floorspace along with the provision of public open space that facilitate access to a previously restricted part of the Borough.

2. SITE AND SURROUNDING AREA

2.1 The following section summarises the key characteristics of the application site and surrounding area. An assessment of the constraints and opportunities presented by the site and wider area is set out within the accompanying Design & Access Statement and Heritage & Townscape Assessment, prepared by TM Architects and Kevin Murphy Associates, respectively.



Figure 2.1: Aerial Photograph of the site (red line approximate)

2.2 The site measures approximately 0.18 hectares and holds a prominent corner position fronting Georgiana Street and Regents Canal. The site is located within the St Pancras and Somers Town Ward which is situated to the centre of the London Borough of Camden. It is comprised of a 2 storey 'L' shaped office building located along the site's western boundary and part of its southern boundary. With the exception of a small security hut located to the front of the site, the remainder is occupied by low rise buildings used for the storage of goods which are located to the north and east of the site (see figures 2.1, 2.2 and 2.3). An area of hard standing used for parking and circulation forms the centre of the site (1,046 sq.m) and leads to the main vehicular access from Georgiana Street.

2.3 Previously the site was used by EDF Energy as a depot for the storage of materials with ancillary offices. However, it is understood they vacated the premises during October 2015 due to the poor standard of accommodation and the fact the site no longer met their operational requirements.

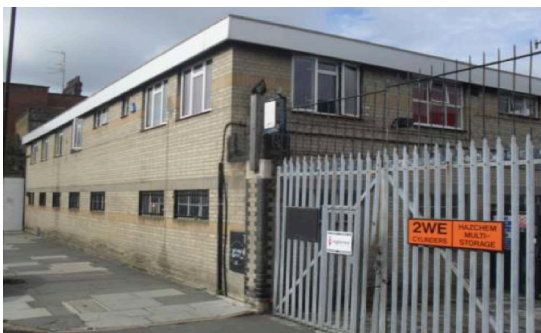


Figure 2.2: Elevation fronting Georgiana Street



Figure 2.3: Existing buildings within the application site

2.4 The site comprises the following uses and associated floorspace.

LAND USE	AREA (SQ.M GIA)	AREA (SQ.M GEA)
OFFICE (USE CLASS B1(a))	774	850
STORAGE (USE CLASS B8)	193	226
SUI GENERIS (SECURITY HUT)	4	7
TOTAL	971	1,083

Source; EDF Property Department

- 2.5 The site's eastern boundary adjoins the Regents Canal with landscaped gardens and a 4 storey purpose built residential block beyond (Reachview Close). Immediately to the south of the site is Georgiana Street which is fronted on the opposite side by a large wall which forms the boundary to the wider St Pancras Commercial Centre – an industrial estate comprising predominantly 2 storey industrial retail units. A recent 7 storey residential building exists to the east of the Commercial Centre industrial estate and adjacent to the canal. The site's western boundary abuts the rear gardens of a terrace of 3 storey residential properties fronting Royal College Street. To the north, the site is bound by Eagle Wharf – a 3 storey warehouse.
- 2.6 The site is identified within the Council's Site Allocations DPD (Reference; Site 35) as being suitable for redevelopment to provide a mixed-use scheme comprising residential and replacement employment use. It is expected that any redevelopment of the site will optimise its potential to provide new housing and make provision for a range of flexible employment uses. An active frontage to Georgiana Street and the adjacent Canal is encouraged as to is the need to ensure the design responds appropriately to the Conservation Area, surrounding locally important and statutorily listed buildings and the openness of the Canal. Further details of the Council's Site Allocations Document and an assessment to which the scheme complies is set out within **Sections 5 and 6**, respectively.
- 2.7 The area surrounding the site is characterised by residential use, albeit interspersed by pockets of commercial uses, including the St Pancras Commercial Centre (east). Buildings within the locale vary greatly in terms of appearance and scale, as described above.

2.8 The site is located within sub area 2 of the Regents Canal Conservation Area. A comprehensive assessment of the Conservation Area and the site in particular is contained within the accompanying Heritage & Townscape Appraisal, prepared by Kevin Murphy Associates. In the context of the application site, the Conservation Area Statement explains;

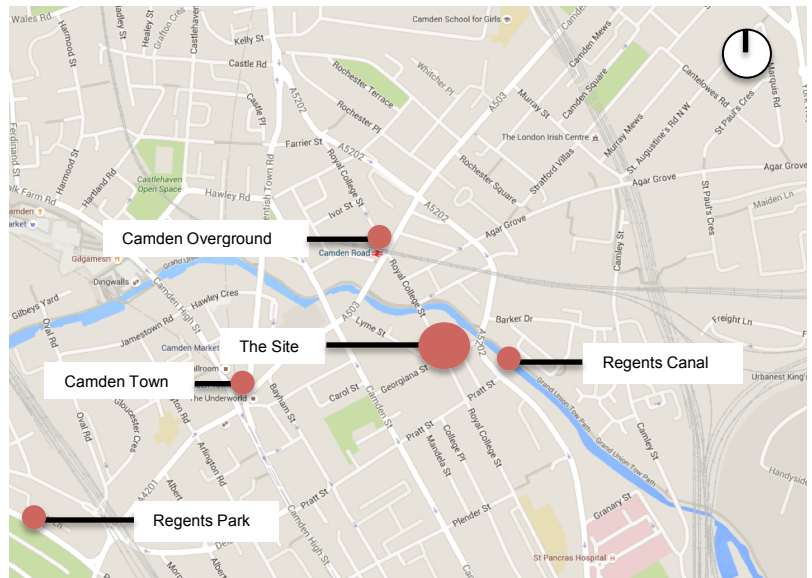


Figure 2.4: Site Location relative to London Borough Camden

'Beyond College Street Bridge (Royal College Street) is one of the largest open planted sections to the canal, the steep bank rising up from the towpath with trees at the top of the bank forming valuable visual containment. On the opposite bank is an excellent example of the reinstatement of a historic canalside warehouse building at Eagle Wharf, whilst the depot site adjacent at Bangor Wharf provides an excellent opportunity for enhancement. The latter's yard area retains extensive areas of granite setts which should be retained or re-used in any development. The canal dock which formerly served these wharfs is partially filled, and could be enhanced.'

2.9 Those properties fronting Royal College Street are statutorily listed. In addition, the following buildings which are within close proximity to the site are considered to make a positive contribution to the Conservation Area;

- 148 and 150 Royal College Street.
- Former forage warehouse at Eagle Wharf and former dock.
- Grays Inn Bridge; and
- The Constitution Pub at 42 St Pancras Way.

2.10 The site benefits from close proximity to a range of services and facilities found in Camden Town Centre/Camden Road which is located approximately 0.5 miles west of the site. This includes Camden overground and underground stations. By virtue of the site's proximity to public services and facilities it benefits from a public transport accessibility level of 6a (PTAL) which supports the principle of high-density development. The full PTAL report is set out within the accompanying Transport Statement.

3. PLANNING HISTORY

3.1 Our review of the Council's online planning register has identified a number of planning applications relating to the historic lawful use of the site as a depot which have been summarised below.

- PEX990072 – certificate of lawfulness refused for existing use of site as builders workshop, office and open yard area. Approved September 1999.
- PEX0000739 - certificate of lawfulness granted for existing use of site as a depot for storage of materials with ancillary workshops and offices (Use Class B8). Approved August 2000.

3.2 In addition to the above we are aware of pre-application discussions held on behalf of another applicant during June 2014 in respect of the application site. That proposal involved redevelopment to provide a part 4, 5 and 6 storey building comprising 34 no. residential units (23 market 21 x 2 bed and 2 x 3 bed, along with 11 affordable units 4 x 2 bed and 7 x 3 bed), 7 no. business units and a restaurant (use class A3).

3.3 Pre-application feedback was provided via Officers report dated 10th June 2014. A summary of the feedback received is set out more fully within **Section 4** of this Statement. In the context of the emerging development option for the site the following points are of interest;

Employment Floorspace

- The provision of employment floorspace as part of the proposal was welcomed and it was acknowledged that 'like for like' replacement of employment floorspace might be difficult to achieve but any net loss would nonetheless need to be justified.
- In considering replacement floorspace, Officer's explained that due regard would be given to other tangible aspects delivered through the scheme including the provision of affordable housing; and
- The need to ensure that any replacement floorspace is suitably attractive to the market with preference for small affordable workspace for SME's/Start Up companies.

Residential Use

- Acknowledgement that residential floorspace is a priority land use within the Borough which is welcomed subject to addressing the above mentioned employment issues.
- The need to achieve an appropriate mix of unit types, particularly in respect of affordable housing; and

- The need to ensure an appropriate living environment for prospective and existing residents, particularly those fronting Royal College Street in terms of overlooking/loss of privacy etc.

Retail Use

- Officers questioned the appropriateness of retail use given the site's 'isolated location'.

Overshadowing to Canal

- Acknowledgement that redevelopment of the site would give rise to some overshadowing of the canal and that such impact should be minimised.

Height

- The proposal at 4, 5 and 6 storeys was considered to be 'broadly acceptable' in light of relevant planning policy considerations and the nature of the surrounding built environment.

Layout

- Preference for the introduction of a courtyard footprint development that provides activity to Georgiana Street and the adjacent Canal.

Parking & Transport

- Given the site's accessibility to public transport it was advised that with the exception of parking for disabled residents car free development should be delivered.

4. PRE-APPLICATION CONSULTATION

Overview

- 4.1 A full explanation of the pre-application consultation exercise and its outcomes are set out in the accompanying Statement of Community Involvement, with the Design & Access Statement demonstrating how the feedback received has informed the scheme. Accordingly, the following section summarises the pertinent issues arising from the pre-application discussions insofar as the evolution of the application proposal is concerned.

THE DETERMINING AUTHORITY

- 4.2 Extensive pre-application consultation has been held with the Council as the Local Planning Authority. In terms of feedback, 3 meetings have been held with representatives of the Council with formal pre-application advice being issued via a letter dated 2nd April 2015, 23rd December, December 2015 (no date provided) and e-mail dated 1st December 2015.
- 4.3 In addition to discussions held with the Applicant, it is noted for the purposes of the following section that the site was subject to pre-application feedback for a scheme advanced by another Applicant (Pre-Application Meeting Report, dated 10th June 2014). Given the similarities between that scheme and this application proposal and the fact that the feedback relates to the same site and was prepared in the same planning policy context, the more generic aspects of that feedback (i.e. land use, affordable and design-related policies) have been referred to as part of the following summary.

Principle of Land Use

- 4.4 In advising on the principle of the proposed uses, Officer's referred to relevant planning policy for the site in the form of the Site Allocations Local Development Document (September 2013) which encourages redevelopment to provide new housing and flexible employment uses.

Employment Floorspace

- 4.5 In terms of the provision of employment use (s), Officers have explained that the existing floorspace on site should be maintained or increased and that this should be the starting point for incorporating any replacement employment floorspace at the site. It was however acknowledged by Officers that such an amount might be difficult to achieve and so partial replacement could be accepted subject to the quality of the replacement floorspace (taking into account current accommodation) and the other tangible benefits delivered by the scheme including affordable housing, comprehensive development and improvements to the character and appearance of the Conservation Area. A

further observation in respect of the employment floorspace was the need to ensure it was attractive to the marketplace and in particular SME's.

- 4.6 The Applicant initially advanced a proposal which made provision for 851sq.m (GEA) of office floorspace. This equated to a net loss of 232sq.m GEA when compared to the employment floorspace at the site (850sq.m B1a and 226sq.m B8). Notwithstanding, and in line with the flexibility outlined previously by Officers (para 4.5), it was advised that this level of provision was acceptable and complied with the overall aims of Policy CS8.
- 4.7 A subsequent scheme was presented to Officers which involved a reduced amount of office floorspace, measuring 515sq.m (GEA). This reduced the previously accepted amount of employment floorspace (851sq.m) by 336sq.m (GEA). The reduction in employment floorspace was a result of the introduction of 3 no. residential units at ground floor level including 1 no. social rented disabled unit. This was introduced as means to address earlier Officer concerns regarding affordable housing mix/tenure. Despite this Officers considered that the revised provision towards employment floorspace was unacceptable. The Applicants' response to the Officer's comments in set out within **Section 6** of this Statement.

Residential Floorspace

- 4.8 With respect to site specific policy encouraging residential use it was advised that such provision would only be acceptable if the land use matters in respect of employment floorspace were satisfied. In terms of affordable housing, Officers made clear that this would be based on a sliding scale whereby the percentage of affordable housing secured would be based on the overall residential floorspace.
- 4.9 The scheme first presented to Officers by the previous applicant proposed 3,761sq.m residential floorspace and Officers advised that based on this, the affordable housing requirement would be 38% affordable housing with a 60/40 split in favour of social rented and intermediate housing, respectively. That scheme however proposed a financial contribution for off site provision which equated to 34% affordable housing which Officers advised was unacceptable. Interestingly, Officers subsequently advised the current Applicant that in line with the sliding scale approach towards affordable housing, 50% provision should be made and so the site by implication could accommodate 50 residential units. The Applicant contended this on the basis of concerns regarding increased provision towards employment floorspace and reductions to the scale of development initially proposed. All of which would serve to reduce the number of residential units which was already below 50.

- 4.10 The first scheme presented by the Applicant proposed 29% affordable housing with 50% affordable rent and 50% intermediate but that was considered unacceptable, albeit it was acknowledged that economic and financial viability considerations would be taken into account. The subsequent scheme proposed 30% affordable housing with an increase in intermediate rented units from 8 to 9 as explained in paragraph 4.5 above i.e. at the expense of some of the employment floorspace. Notwithstanding the increase in the overall percentage of affordable housing and intermediate rented units this was deemed unacceptable due to the resultant loss of employment floorspace.

Unit Mix

- 4.11 In referring to preferred unit mix, Policy CPG 2 has been cited by Officers which in terms of affordable housing requirements suggests that 50% of social/affordable rent housing should be 3+ beds units with no more than 20% 1 bed units and 30% 2 bed units.
- 4.12 In terms of intermediate housing it was advised that Camden generally seeks a mix of 1 and 2 bedroom intermediate homes. With respect to market housing mix reference was made to Policy DP5 which encourages 40% 2 bed units, which is the highest priority, identifying thereafter that 3 and 4 bed units each have a medium priority.
- 4.13 The scheme initially advanced by the Applicant involved 35% dwellings as 1 bed, 54% as 2 bed and 10% as 3 bed. It was considered that 2 bed units were likely to be acceptable but the proportion of 1 and 3 bed units did not accord with policy standards. Following a similar theme it was advised that the subsequent units mix of 21 x 1 bed units (42%) and 9 x 3 bed units was unacceptable but the provision of 2 bed units acceptable.

Standard of Accommodation

- 4.14 Officers made clear that all residential units would need to be built to the highest possible residential standards with each unit being sufficiently sized in accordance with the London Plan and suitably designed internally (in line with Policy CPG2). It was noted that the layout of the scheme advanced by the previous Applicant was not acceptable based on the majority of units being single aspect and instances of overlooking within the site and to existing neighbouring properties. Conversely, the scheme advanced by the current Applicant was considered to provide a good standard of residential accommodation either meeting or exceeding the unit and private amenity standards set out within the London Plan.
- 4.15 The positive feedback from Officers was again expressed in respect of the updated scheme whereby the unit sizes, provision of private amenity space and general standard of accommodation, including aspect were welcomed. It was however advised that consideration ought to be given to

instances of overlooking between the proposed residential units and this should be subject to further detailed design.

Overshadowing to the Canal

- 4.16 The scheme advanced by the previous Applicant proposed a continuous frontage of development adjacent to the Canal which Officers believed to result in an adverse impact of overshadowing to the canal. Whilst officers considered this inevitable given the type and nature of development and proximity they suggested that the existing situation should not be 'significantly worsened' and that one way in which this matter could be addressed was through a courtyard footprint arrangement. *'This would enable the Applicant to increase the height of the development in other parts of the site and thereby reduce it adjacent to the Canal.'*
- 4.17 The current Applicant took the opportunity to incorporate the Council's suggestion of introducing a courtyard element adjacent to the Canal as a means to open up this area, facilitate public access and remove any concerns with the previous scheme insofar as overshadowing of the canal was concerned. With respect to public access to the courtyard it was advised that this would be controlled by timed access.

Design

- 4.18 The proposals advanced by the previous Applicant involved a 3 tiered building of 4, 5 and 6 storeys which was considered by Officers to be, *"broadly within the appropriate parameters"*. It was however considered that prior to this being confirmed the proposal would need to incorporate the courtyard footprint and to activate Georgiana Street. It was also advised the degree of legibility and public access to the canal side was limited and so the building layout was not conducive to facilitating maximum public use.
- 4.19 Conversely the scheme advanced by the current Applicant was considered to be a vast improvement insofar as the parameters set out within the Site Allocations DPD were concerned. Particularly, in terms of providing an active frontage to Georgiana Street, the creation of a sense of openness at the Canal edge through the provision of a courtyard and by limiting height at the west of the site.
- 4.20 With regard to the issue of height and scale the proposal initially advanced by the current Applicant involved a 3 tiered building of 5, 6 and 7 storeys. In terms of the proposed height it was advised that, *"a balanced view would be taken of the merits of the proposal in preserving and enhancing the character of the Regents Canal Conservation Area and the delivery of an optimal housing led redevelopment of the site"*. Officers went on to explain that, *"The guiding principle will be that new buildings on this site should conform to the scale of the surrounding network of Victorian streets and*

to the canal as a corridor of unique character and valuable public open space. To the north and east of the site we consider the relevant scale reference points are the building on Eagle Wharf and The Constitution public house. Both are positive contributors to the conservation area.”

- 4.21 Notwithstanding the positive nature of the feedback provided above, pre-application discussions were taken over by a different Officer who subsequently advised that there were concerns insofar as the footprint of the proposed building (s) were concerned and the height of the proposal at 7 storeys. Despite the Applicant providing justification to support the height proposed, Officers advised, *‘there is no townscape case for the site to be considered a ‘gateway’ or ‘marker’ site and there are important differences between the context of this site and the examples provided of other taller canal building’*. It is however noted that no justification for dismissing the height and footprint of the then proposed buildings was provided.
- 4.22 By virtue of concerns regarding height, Officers also considered that the stepping down in scale of individual buildings, particularly the elevation to Georgiana Street was, *‘clumsy and poorly resolved’*. In terms of detailed design it was advised that the industrial heritage of the site should inform the elevations of the proposed buildings. In this regard it was advised that, *‘without wishing to be prescriptive about what an appropriate architectural response might be, contemporary interpretation of the Victoria warehouse vernacular might prove to be a more successful model’*

Residential Amenity of Neighbouring Occupiers

- 4.23 Officers acknowledged that minimising overlooking to existing nearby occupiers will be a challenge in any proposal at this location, owing to the acknowledged existing urban grain context. Accordingly, it was advised that mitigation measures and distances towards existing residents within all nearby dwellings will need to be demonstrated in full in any submission. In this context reference was made to CPG6 which requires that a distance of 18m between windows is generally required; this should be followed in any proposal at the site, with any shortfalls identified and explained.

Trees

- 4.24 Each of the proposals presented to Officers propose the removal of the Willow Tree at the corner of the site (closest to St Pancras Way). Officers have advised that if this tree was to be removed it would need to be justified by a full arboricultural report. At the point of writing the existing tree had not been assessed by Officers and so it was not known if there would be an objection on this basis or not.
- 4.25 As part of feedback received to subsequent iterations of the scheme was suggested that it would be preferable to see 1 or 2 larger trees within the proposal rather than 8 smaller specimens.

Energy & Sustainability

- 4.26 Owing to the scale of development it was recommended that a Sustainability Strategy would need to be submitted with the application, in line with policies CS13, DP22 and CPG3. Within this, a Code for Sustainable Homes Pre-Assessment would be required for the residential units proposed. It would be expected that 'level 4' rating would be secured, with the necessary water, materials and energy categories adhered to. The Sustainability Strategy would also need to incorporate a BREEAM pre-assessment should 500sqm or more of non-residential development be proposed. The BREEAM pre-assessment would be required to meet an excellent rating, with 60/60/40 of credits secured in the energy, water and materials categories, respectively. In addition, the Mayor's 35% CO2 reduction target will be sought.

Transport & Servicing

- 4.27 Due to the scale of development proposed a Transport Assessment was requested in support of any planning application forthcoming. Given the site's PTAL rating of 6a any form of car parking at the site would be resisted except for disabled parking, if indeed the provision of disabled parking was considered necessary. It was advised that cycle parking provision would need to be made in accordance with Policy Guidance in the form of CPG 7.

Access

- 4.28 It was advised that all dwellings should accord with lifetime homes standards and that there is a requirement for 10% of the residential units, across all tenures, to be suitable for wheelchair users.

4.29 STAKEHOLDER CONSULTATION

- 4.30 The accompanying Statement of Consultation, prepared by Curtin & Co provides a full and comprehensive account of stakeholder consultation undertaken by the Applicant in support of the proposal, including the responses received from the consultation exercise. The remainder of this section therefore provides a summary of the consultation exercise feedback.

- 4.31 In order to engage with stakeholders in an open, transparent and comprehensive manner the following activities were undertaken as part of the consultation process;

- Meetings with local Ward Councillors.
- Door-to-door canvassing of local residents.
- Further engagement with local residents.
- Meetings with local community groups.

- Insertions into local news publications; and
- Drop-in Centre held over two days.

4.32 Those stakeholders approached in connection with the consultation exercise included;

- Residents from the surrounding area, including Reachview Close estate.
- Representatives of Regents Canal Conservation Area Advisory Committee; and
- Political Representatives.

4.33 In total, 41 consultees attended the consultation event held at the application site between on 11th and 12th February. In terms of the feedback 19 responses were received with almost two thirds of residents agreeing or strongly agreeing that there is a need for new homes in Camden and a further 53% strongly agreeing that the site is suitable for new housing and employment space.

4.34 Where concerns were raised they focused on the proposed height of the development, loss of views, daylight and sunlight and effect on wildlife.

OUTCOMES

4.35 The submitted Statement of Consultation and Design & Access Statement sets out the responses to the feedback received from the consultation exercise with the Design & Access Statement illustrating how this has informed the scheme. For the purposes of this statement and in terms of the amendments made to the scheme in response to feedback received following key points are noted:

- Reduction in the height of the building closest to Grays Inn Bridge from 7 to 6 storeys and the building closest to Eagle Wharf from 6 to 5 storeys.
- Relocation of the wildlife island at the canal to ensure that when nesting birds returned they wouldn't be disturbed.
- Increase in office floorspace from 515 sq.m to 686 sq.m; and
- Revision to elevational treatment of the proposed buildings, particularly those fronting Georgiana Street.

5. APPLICATION PROPOSAL

- 5.1 The following section describes the constituent parts of the application proposal. Reference should also be made to the accompanying Design and Access Statement and other supporting reports for further details of individual aspects of the scheme.
- 5.2 The proposed redevelopment of the site will create a residential-led, mixed-use development incorporating 46 no. residential units (Use Class C3), 604sq.m (GIA) of replacement Office (Use Class B1 (a)) floorspace and a new landscaped courtyard space. The full description of development is set out with **Section 1** of this report.
- 5.3 TM Architects have been working closely with key stakeholders to develop a proposal which sensitively responds to the constraints and opportunities presented by the site and surrounding area. In this regard one of the key objectives was to ensure that the proposal enhances the character and appearance of the Regents Canal Conservation Area and compliments, rather than competes with locally important buildings (Constitution House and Eagle Wharf). The development proposal has been subject to a series of iterations and reflects pre-application discussions with representatives of Camden Council, key stakeholders, local businesses, politicians and local residents.
- 5.4 The constituent parts of the scheme are summarised below;

Overview: Site Wide Approach

- 5.5 The proposal is comprised of 3 no. buildings (1, 2, 4, 5 and 6 storeys) forming a 'u' shape which is arranged around a courtyard space. The majority of the ground floor is proposed to be office use (Use Class B1 (a)) which assists with activating the courtyard area and the frontage to Georgiana Street. The remainder of the ground floor provides for 3 no. residential units, including 1 no. ground floor fully fitted wheelchair apartment which is required at grade in order to achieve level access.
- 5.6 Adjoining the Canal to the east of the site is the new landscaped courtyard space which can be accessed directly from Georgiana Street. This space provides an opportunity for this previously restricted part of the canal to be enjoyed informally by the public, residents and workers.
- 5.7 The remainder of the residential units (43 no.) are proposed at first to fifth floor level incorporating a mix of affordable and social rent, shared ownership and market units of varying sizes. Each unit will

be provided with private amenity space in the form of a balcony or a terrace. In addition, the first floor roof garden provides informal area for play, details of which are provided below.

Residential Component

- 5.8 The residential accommodation will be arranged into two separate buildings which range in height from 4 storeys with a 5th Storey set back to 5 storeys with a 6th storey set back. The proposal is developed around three cores including one to the north, south-east and south-west. Each of the residential entrances of the development is served by Part M passenger lifts providing access to all floors.
- 5.9 The proposed residential use (Use Class C3) will be located to the north and south of the site, divided by the ground floor courtyard space and first floor informal children play space. In total provision is made for 46 no. residential units (measuring approximately 3,068sq.m (GIA)) comprising 18x1-bed, 19x2-bed and 9x3-bed units. The residential accommodation will be accessible by way of 4 no. dedicated points of access of which 3 are from the courtyard area and 1 directly from Georgiana Street. Each core will provide direct access to a staircase and lift, providing access to upper residential floors.

Table 1: Residential Accommodation

Unit Type	Tenure			
	Market	Affordable Rent	Social Rent	Shared Ownership
1bed 2 persons	14	1	0	3
2 bed 3 persons	1	2	0	0
2 bed 4 persons	11	4	0	1
3 bed 5 persons	7	0	2	0

- 5.10 Each of the units has been designed to meet the Mayor's latest Housing Standards.

Replacement Employment Floorspace

- 5.11 The proposed development will provide 686sq.m (GEA) or 604sq.m (GIA) of high quality, dedicated office floorspace (Use Class B1a). The proposal will provide this accommodation across 3no. separate open plan units, albeit the space is designed to be flexible and so they could be subdivided to provide additional individual units for business start-ups or Small and Medium Enterprises (SMEs).
- 5.12 Office units will be located at ground floor (and partially within a mezzanine) to the south-east, south-west and north-west of the site. Each of the units is accessed via a dedicated core with one being positioned on Georgiana Street and two others within the Courtyard Area.

Elevational Treatment

- 5.13 Taking into account the context of the site and the proximity to the associated heritage assets, careful consideration has been given to how the proposal will relate in terms of elevational treatment to the surrounding Conservation Area and in particular the Canal setting and individual buildings.
- 5.14 The main facing material is brick - a multi stock that will complement the variety of brickwork to be found in the vicinity. It is also proposed to use blue/black engineering brick along the canal frontage (new retaining structure), in the spandrel panels beneath the windows to the canal side commercial unit and in the low walls in the courtyard. The spandrel panels will have projecting headers similar to those shown on the opposite page to provide textural interest.
- 5.15 The set-back top floor of the building on Georgiana Street/canal frontage, will be finished in zinc to complement the multi stock facing bricks.

Private and Public Amenity Space

- 5.16 The proposed development will provide a total of 1,233sq.m amenity space. This level of amenity provision is achieved through the provision of 146sq.m of children play space, 484sq.m towards communal and public open space in the form of the landscaped courtyard and 603sq.m private amenity space for all apartments in the form of private balconies, terraces and for the wheelchair unit a garden. Further details regarding the landscape strategy and design are detailed within the accompanying Design and Access Statement.

Landscaping

- 5.17 The existing yard at Bangor Wharf is covered by tarmac, albeit there are a few signs of remaining areas of granite setts around the perimeter. There are also some granite kerbstones. As part of the

proposal the Applicant will take the opportunity to salvage and incorporate these materials into the landscape element of the replacement scheme.

- 5.18 A survey undertaken on behalf of the Applicant has revealed that the existing canal wall (adjacent to the sites' eastern boundary) is in poor condition and requires attention. In this regard the proposal is to face the new retaining structure with blue/black engineering bricks, finished with a bullnosed edge. In front of this will be laid three or four courses of reclaimed granite setts, giving the canal edge a distinctive appearance and providing a reminder of its original industrial use. It is proposed that any surplus setts will be used as edging around the courtyard. The granite kerbstones will be used to form the new steps in the landscape within the courtyard.
- 5.19 It should be noted that these works and the straightening out of the canal wall in particular are subject to approval from the Canal River Trust Authority. If agreement cannot be reached the Applicant will make necessary repair works to the existing canal as currently aligned.
- 5.20 The former dock at the northern end of the site was fully infilled in the fifties. The ownership of the resulting hardstanding is split equally between Bangor Wharf and Eagle Wharf. The improvement or rebuilding of the canal wall will maintain the small inlet that marks the entrance to the former dock making reference to its historical layout. It is a conscious decision of the applicant to not develop on this part of the site so as to safeguard the setting of the former dock and Eagle Wharf.
- 5.21 The rest of the courtyard will be hard-landscaped using a permeable paving such as Marshalls Tegula Permeable Block Paving, with two courses of blue/black engineering brick pavers providing visual interest and pattern. The fall across the site will be a maximum of 1:20, including the ramped areas with a short run of wide steps leading down to the water.
- 5.22 The landscape will include 2 or 3 trees, such as a fastigiata hornbeam (*Carpinus betulus* 'Fastigiata') or a field maple (*Acer campestre*) that will provide shade and habitat for birds and insects. There are some small planting beds, or 'rain gardens' along and at the base of the sloping surface where rainwater can collect. These will be planted with moisture tolerant plants such as reeds, iris, prostrate willow (*Salix repens*) etc. and will provide colour and habitat as well as some privacy screening for ground floor apartments.

Access, Servicing & Parking

- 5.23 Pedestrian access to the site is provided for all pedestrians including the mobility impaired via Georgiana Street. This access will lead directly to individual entrance points for each of the respective uses proposed at the site. The B1 uses will have separate entrances to the C3 residential units (accessed solely through the courtyard) with two of the B1 units (at blocks A and B) being accessed directly from Georgiana Street.

- 5.24 The proposed development is car free and so vehicular access into the site is restricted to emergency vehicles. In such instances the site has a large gate (directly from Georgiana Street) to control vehicles entering the site and this aspect of the scheme has been specifically designed having regard to consultation undertaken with the London Fire and Emergency Planning Authority.
- 5.25 The gate will not be open for general vehicular access by the public or residents of the development. In addition, there will be rising bollards behind the gates within the courtyards which will also serve to prevent ad hoc access by non-emergency vehicles.
- 5.26 The proposed development is expected to be serviced directly from Georgiana Street. It is envisaged that occasional deliveries will be made to site by postal/courier, food home delivery vehicles, waste and recyclables vehicles and infrequent maintenance vehicles. Waste storage has been designed to be located within local minimum travel distances from Georgiana Street. Waste/recyclables storage will be located on the ground floor to the west of the undercroft.
- 5.27 As highlighted above, the proposed development has been designed to be car free and this has been agreed with representatives of the Council's Highways department. During pre-application discussions Officers have confirmed that Georgiana Street has capacity for disabled parking and servicing from the street. This means disabled users would be able to park directly outside the site and other than reinstating the footway no further works to Georgiana Street are required to facilitate this.
- 5.28 The residential element of the scheme will have 75 cycle parking spaces which adhere to cycle parking requirements. These will be located in secure and covered storage areas which are accessed either via the building plot or a pedestrian entrance which provides an onward route through to its own cycle storage or through the courtyard to storage for building plots B and C. In addition, B1 office cycle parking (7 no.) will provided within the courtyard, in line with relevant policy standards.

Sustainability

- 5.29 The proposal has been designed to meet the Mayors 35% carbon reduction targets. To achieve these accreditations, a number of renewable energy technologies have been incorporated into the design, including CHP and photovoltaic.

6. PLANNING POLICY ASSESSMENT

Planning Policy Context

6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies contained within the Statutory Development Plan unless material considerations indicate otherwise. The Development Plan for the London Borough of Camden consist of the following suite of documents;

- The London Plan (Spatial Development Plan for Greater London) (July 2011).
- Camden Core Strategy (adopted November 2010).
- Camden Development Policies (adopted November 2010).
- Site Allocation Document (Proposed Submission March 2012); and
- Camden Planning Guidance Supplementary Planning Documents (2011) including;
 - CPG 1 Design.
 - CPG 2 Housing.
 - CPG 3 Sustainability.
 - CPG 5 Town Centres, Retail and Employment.
 - CPG 6 Amenity; and
 - CPG 7 Transport.

6.2 In addition, consideration has been given to National Planning Policy Framework ('NPPF') (2012) which sets out the Government's objectives for planning and represents a material consideration for the purposes of the decision making process.

6.3 The following section provides a summary of the planning policy context relevant to the consideration of this application proposal and provides an assessment of the extent to which it complies. The assessment has been provided under the following thematic policy issues;

- Principle of Mixed-Use Development.
- Residential Matters
- Replacement Employment Floorspace.
- Heritage.
- Design.
- Transport, Parking and Servicing.
- Environmental Considerations; and
- Public and Private Amenity Space.

PRINCIPLE OF MIXED-USE DEVELOPMENT

- 6.4 The proposed scheme provides for a comprehensive redevelopment of the site to provide a mixed-use residential-led scheme comprising 46 no. residential units together with 686 sq.m of new and improved replacement office floorspace along with a new landscaped courtyard.
- 6.5 The NPPF identifies the promotion of mixed-use development as a core planning principle, stating that *'planning...should encourage multiple benefits from land in urban areas'* (reference: paragraph 69). At the strategic level, the London Plan identifies that *'boroughs should identify and seek to enable development capacity to be brought forward to meet housing targets... and in particular the potential to release brownfield housing capacity through mixed-use development, especially of surplus commercial capacity and surplus public land'*. At the local level the adopted Core Strategy highlights that mixed-use developments can contribute to successfully managing future growth in Camden and assist in making an efficient use of limited land (Reference; 'Making the best use of Camden's limited land' Core Strategy page 25).
- 6.6 The appropriateness of the site for a mixed-use development is reinforced by way of the Camden Site Allocations Document (Reference; Site 35 Bangor Wharf, Georgiana Street). The overarching objective for the site is redevelopment to provide replacement employment floorspace and new permanent (Class C3) residential accommodation. Other site-specific policy objectives for the site, along with the scheme compliance, is set out within Table 1 below.
- 6.7 Having regard to the above and Table 1, it is evident that the principle of the delivering a mixed-use development at the site which incorporates residential and employment use (s) is supported by local, strategic and national planning policy.

Table 1: Planning Policy and Proposal Compliance - Principle of Mixed-Use Development

Policy Context	Policy Reference(s)	Compliance with Policy
<p>Site Specific</p> <p>The application site is located approximately 500 meters to the east of the designated Camden Town Centre. In such locations Policy CS1 anticipates limited growth that contributes towards housing, as an identified priority land use, and employment opportunities.</p> <p>At a site-specific level, the site is identified within the Camden Site Allocations Document (Reference;</p>	<p>NPPF</p> <p>Paragraph 23 and 111</p>	<p>The application proposal seeks to deliver a mixed-use residential-led development incorporating replacement office floorspace. The application site represents previously developed brownfield in a prominent and highly accessible location.</p> <p>Accordingly, it has been identified by the Council, through its Site Allocation DPD, as being appropriate for redevelopment and intensification to deliver residential and employment use (s). In pursuance of this a number of site-specific objectives for the site have been established.</p> <p>In accordance with these objectives the proposal</p>
	<p>London Plan</p> <p>Policy 2.9 'Inner London'</p> <p>Sub-regional Framework Central London (2006)</p>	

<p>Site 35 Bangor Wharf, Georgiana Street). The overarching objective for the site is its redevelopment to provide replacement employment floorspace and new permanent (Class C3) residential accommodation. In particular, development will be expected to:</p> <ul style="list-style-type: none"> • Optimise the potential of the site to provide new housing (including affordable housing) while minimising potential conflicts between residential and other uses. • Provide flexible space suitable for a range of employment uses. • Contain an active frontage to Georgiana Street, and to maximise opportunities to provide linkages to the canal towpath. • Be of a form and scale which is appropriate to the Regents Canal Conservation Area and responds to the open character of this part of the canal and to surrounding listed buildings. • Take opportunities to utilise the canal for the transportation of goods and materials, both during construction and in the operation of the development. • Ensure that the design and layout of the development responds positively to its canal setting, and contributes to the biodiversity and green nature of the canal. • Provides active frontage to the canal and to Georgiana Street, in order to improve the relationship between the site and the public realm and to enhance the appearance and safety of the surrounding street scene; and • Provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible 	<p>Core Strategy Policy CS7 Policy CS14</p>	<p>improves the appearance of the site through the removal of the existing poor quality and unattractive buildings. It also optimises the site's capacity whilst paying careful consideration to the surrounding built environment and heritage assets to deliver a high quality scheme incorporating residential and flexible employment floorspace.</p> <p>In further considering the design-related objectives it is the case that the scheme provides an active frontage to Georgiana Street and the Canal and in doing to facilitate public access to a part of the Borough that was previously restricted.</p> <p>The principle of the proposal and, where relevant, its constituent parts are in accordance with planning policy objectives. The proposed uses have been accepted by Officers representing the Council subject to justifying a reduction in employment floorspace.</p>
	<p>Development Policies Policy DP25</p>	
	<p>Management Strategy and Site Allocations DPD Site 37 – Roundhouse Car Park (west of the application site)</p>	
	<p>Regent's Canal Conservation Area Management Strategy (2008)</p>	
	<p>London Plan Policy 2.9 'Inner London'</p>	
	<p>Core Strategy Policy CS3</p>	
	<p>Development Policies Policy DP1</p>	

RESIDENTIAL MATTERS

6.8 The supporting Design and Access and Affordable Housing Statements provide a full explanation of the approach taken with regard to the housing component of the application proposal. Table 2 summarises this element of the proposal and its compliance with planning policy.

Table 2: Planning Policy and Proposal Compliance - Residential

Policy Context	Policy Reference(s)	Compliance with Policy
<p>Housing Supply</p> <p>Policy CS6 seeks to maximise the supply of additional housing over the entire plan period in order to meet its strategic housing target of 8.925 new homes between 2010-2025. In view of the significant and increasing demand for housing Policy CS6 regards housing as a priority land-use within the borough.</p>	<p>NPPF Paragraphs 47, 49 and 111</p>	<p>The proposal includes provision for 46 no. residential units through the careful redevelopment and intensification of an under utilised site. The number of units will contribute towards the Council's housing supply target as prescribed in the Development Plan.</p>
	<p>London Plan Policy 3.3</p>	
	<p>Core Strategy Policy CS6</p>	
	<p>Development Policies Policy DP1 Policy DP2</p>	
<p>Density</p> <p>The Development Plan identifies the London Plan Density Matrix as a broad standard for establishing density based on PTAL Rating.</p> <p>In the instant case, the PTAL rating for the application site is 6a <i>excellent</i>. Under the London Plan, the advisory density is 200-700 hrph or 45-260 units per hectare</p> <p>It should however be noted that the policy standards represent an advisory range and will be applied flexibly with regard to local context and constraints.</p>	<p>NPPF Paragraph 47</p>	<p>The density achieved through the application proposal is 256 dph and is therefore in accordance with the advisory standards set out within the London Plan.</p> <p>This is a useful indicator as to the acceptability of the quantum of development proposed for the site. However, in accordance with overall policy considerations, the appropriateness of this amount of development is considered in the context of the local built environment, heritage assets and living environment for prospective residents and existing, below.</p>
	<p>London Plan Policy 3.4 Table 3.2</p>	
	<p>Core Strategy Policy CS1 (London Plan Density Matrix Table 3.2)</p>	
	<p>Development Policies London Plan Density Matrix Table 3.2</p>	
<p>Dwelling Mix</p> <p>The Development Plan identifies that dwelling mix will be adjusted accordingly in relation to individual site location within London and to maintain strategic and local housing supply targets.</p>	<p>NPPF Paragraph 50</p>	<p>In terms of the proposed market units, the scheme provides for 14 no. 1 bed units (42%), 12 x 2 bed units (36%) and 7 x 3 bed units (21%). With respect to the Council's highest priority for 3 bed market housing the scheme is just 4% below that required (36% provision against a target of 40%). There is no specific</p>
	<p>London Plan Policy 3.8</p>	
	<p>Housing SPG (Nov 2012)</p>	

<p>Local planning identifies the following priorities:</p> <p>Market: 2-Bed - 40% (homes with 2-beds are highest priority, homes with 3-Beds and 4-Beds+ each have a medium priority; 1-Bed are lower in priority).</p> <p>Social 4-Bed+ 50% (4-Bed+ are highest priority; 3-Bed are high priority; 2-Bed are medium priority; 1-Bed are lower in priority).</p> <p>Intermediate 3-Bed+ 10% (3-Bed+ are highest priority but homes of all sizes are required; 1-Bed are medium in priority).</p> <p>In connection with policy relating to housing mix, the latest Annual Monitoring Report 2013/14 explains that;</p> <p><i>“The council will aim for at least 50% of social rented dwellings and 10% of intermediate affordable dwellings to be large homes with 3-bedrooms or more, and for at least 40% of market housing to contain 2-bedrooms.”</i></p>	<p>Standard 2.2.1</p> <p>Core Strategy Policy CS6</p> <p>Development Policies Policy DP5 Dwelling Size Priority Table</p>	<p>percentage requirement for 1 or 3 bed units. It is the case that all of the proposed social rented housing are 3 bed 5 person units and so the scheme significantly exceeds the policy requirement of 50%. Whilst the scheme is unable to support 10% 3 bed units, 3 units are allocated as 1 bed units which is identified by the Council as being medium priority.</p> <p>It is considered that the proposal provides for a good mix of units that balances the requirements of policy against site constraints and viability considerations, as allowed for within relevant planning policy. Indeed, the flexibility enshrined within policy is best reflected through the Council’s latest AMR which explains that during 2013/2014 only 21% large social rented units were secured (compared to the 50% target), 0% large intermediate units (compared to 10% target) and 44% 2 bed units (4% above the target).</p> <p>Based on the performance against the policy targets, the Council is well aware of the practical issues associated with delivering its preferred housing mix, albeit this scheme exceeds past performance rates.</p>
<p>Residential Space Standards and Layout</p> <p>Strategic and local policy identifies that proposals should seek to ensure that new developments reflect the minimum space standards. CPG 2 Housing identifies that dwellings should incorporate a layout which allows for permanent partition between eating and sleeping spaces.</p> <p>Notwithstanding the above, the Government has recently introduced National Space Standards prescribing the size of individual units, otherwise referred to as ‘Technical Housing</p>	<p>National Space Standards (March 2015)</p> <p>London Plan Policy 3.5 Table 3.3</p> <p>Housing SPG (Nov 2012) Standard 4.1.1</p> <p>Core Strategy London Plan Standards</p> <p>Development Policies</p>	<p>Recently issued Government guidance in the form of the National Space standards sets lower unit size requirements than local policy.</p> <p>Notwithstanding, the proposal is fully compliant with the required space standards outlined within policy in terms of both local and national requirements. It is a further benefit that in all cases the units proposed meet or exceed the minimum standards.</p> <p>With respect to internal configuration, each unit proposed incorporates a permanent partition between areas for eating and sleeping.</p>

Standards – March 2015'. This guidance is to be used by individual Local Authorities and supersedes all relevant local level planning policy.	London Plan Standards	
	Supplementary Planning Guidance CPG 2 Housing - Layout and Space Standards	
Residential Amenity It is a general expectation that development proposals provide outdoor space for private or communal amenity space, wherever possible. This is supported by national policy which advises that developments should optimise the potential of sites to create and sustain a range of uses which include green and other public spaces.	NPPF Paragraph 58	The proposed development will provide a total of 1,233sq.m amenity space. This level of amenity provision is achieved through the provision of 146sq.m of children play space, 484sq.m towards communal and public open space in the form of the landscaped courtyard and 603sq.m private amenity space for all apartments in the form of private balconies, terraces and for the wheelchair unit, a garden. The proposal therefore delivers a range of amenity space (s) to meet the needs of prospective occupants and workers. Again, a further benefit of this proposal is that relevant policy standards are exceeded.
	London Plan Policy 3.6	
	Core Strategy Policy CS5	
	Development Policies Policy DP26	
	Supplementary Planning Guidance CPG 6 Amenity	
Affordable Housing A sliding scale will apply for mixed use schemes where the development has less than 1,000sqm of non-residential floor space but has a residential capacity of 10-49 homes (i.e. 1,000sqm to 4,900sqm residential floor space) (Paragraph 2.35 of CPG2).	NPPF Paragraph 50	Due to the economics of provision the maximum level of affordable housing that can be supported is 29%. Notwithstanding, the overall proportion of affordable housing is comprised of 74% rented accommodation and 26% for intermediate housing, thereby exceeding policy targets. In accordance with relevant planning policy further details in respect of affordable housing offer and the associated viability considerations are outlined within the accompanying Viability Report and Affordable Housing Statement.
	London Plan Policy 3.9, 3.11 and 3.12	
	Core Strategy Policy CS6	
	Development Policies Policy DP3 and CP2	

REPLACEMENT EMPLOYMENT FLOORSPACE

Table 3: Planning Policy & Proposal Compliance - Employment

Policy Context	Policy Reference(s)	Compliance with Policy
The NPPF identifies that to activate growth, local authorities should plan proactively to meet the development needs of business	NPPF Paragraph 20 and 22	In line with national, regional and local level policy the proposal makes an efficient use of a poorly performing employment site to deliver residential and new and improved employment

<p>and support an economy fit for the 21st Century. In addition, it is noted that national policy highlights that land and buildings should be treated on their merits and relative need; and long-term protection of employment sites should be avoided. Similarly, the London Plan seeks to promote and enable the continued development of a strong and sustainable economy by ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost.</p> <p>The local planning context seeks to promote a strong economy and aims to safeguard existing employment sites and premises in the borough unless it can be demonstrated to the Council's satisfaction that the existing use has become redundant.</p> <p>In recognition of the above, and as stated previously, the Council's Site Allocations DPD identifies the site for redevelopment and intensification to deliver replacement employment floorspace and residential use (s).</p>	<p>London Plan Policy 4.1 Policy 4.2a</p>	<p>floorspace. The existing site comprises 774sq.m of office floorspace (GIA) and 193sq.m of storage and distribution floorspace (GIA) (collectively measuring 967sq.m GEA). The proposal provides for 604sq.m of flexible employment floorspace designed to meet the needs of start up businesses and SME's.</p> <p>The proposal therefore results in a net reduction of 363sq.m (170sq.m office and 193sq.m storage and distribution). As set out within pre-application feedback Officers accepted a net reduction in the amount of employment floorspace. The reasoned justification supporting this is summarised within the following points and set out fully within paragraphs 6.9 to 6.14.</p> <ol style="list-style-type: none"> 1. The existing premises are no longer suited to modern occupier requirements as evidenced through the building condition and its vacancy. 2. There is a significant oversupply of employment floorspace within the London Borough of Camden. Accordingly, the loss of 363sq.m of outdated employment floorspace will not have a detrimental impact on the Council's strategic requirements. 3. The proposal will deliver new and improved office floorspace for start up businesses and SME's and therefore represents a qualitative improvement. It is estimated that the proposal will generate in the region of 50 full time jobs as opposed to 0 jobs currently provided on site. 4. The amount of employment floorspace has been derived having regard to viability constraints and the need to deliver much needed housing, including affordable housing. 5. The proposal brings about a number of other tangible benefits such as improvements to the appearance of the site and surrounding area, delivery of affordable housing, financial contributions and improved sustainability performance which officers indicated through pre-application discussions would be considered when assessing the loss of employment floorspace.
	<p>Core Strategy Policy CS8</p>	
	<p>Development Policies Policy DP13</p>	
	<p>Supplementary Planning Guidance CPG 5 Town Centres, Retail and Employment – Paragraph 6.3</p>	

REPLACEMENT EMPLOYMENT FLOORSPACE – MATERIAL CONSIDERATIONS

Existing Building Condition and Attractiveness to the Market Place

- 6.9 It is evident that the existing buildings on site fail to meet the requirements of prospective tenants which is evidenced through EDF seeking alternative accommodation within London and the site's current vacancy. This is due to age, construction, fit-out, limited disabled access, floor plate inefficiencies, poor thermal conditions, and inadequate cross ventilation. Accordingly the existing buildings no longer meet modern occupier requirements. In that respect the existing buildings suffer from a number of fundamental deficiencies which means demand for office accommodation of this type is redundant.

Local Employment Floorspace Supply and Demand

- 6.10 It is understood from the Council's Employment Land Review (2008) that Camden as a Borough will benefit from a net gain supply of 468,000sq.m of office floorspace from outstanding permissions which will provide a generous 15 year supply of office floorspace to the borough and that this provision will more than exceed the office floorspace requirement to 2016. The most recent analysis of supply and demand of office floorspace is set out within the Council's AMR 2013/2014. In line with the projected oversupply identified in the ELR the Council experienced a net gain of 57,914sq.m of B1 floorspace in 2013/2014 alone (reference para 13.1). Over the past 5 years the Council has seen a net gain of approximately 45,121sq.m employment floorspace of which the majority has been directed to the Council's identified growth areas.
- 6.11 When analysing the existing and proposed floorspace it is evident that the proposal will result in a reduction of 363sq.m of floorspace (170sq.m office and 193sq.m storage and distribution) when compared to existing. Due to the nature of the existing building it is argued that a loss of 363sq.m outdated, second hand office space will not significantly impact on Camden's local economy. The space has become vacant due to the current occupier seeking replacement office accommodation elsewhere within London and it would appear unlikely that the buildings in their current condition would be successfully let. Nor is there any viable prospect of improving the building for continued employment use.

Qualitative Benefits

- 6.12 The proposal seeks to provide replacement office floorspace which will better meet modern business needs, providing an appropriate environment that is fit for purpose and provides a more valuable and viable workspace. By providing updated office accommodation in this location, the proposal will provide space which is more akin to the current market and will also create new opportunities to support small and medium enterprises and new business start-ups.

6.13 Currently the site provides zero employment opportunities as it is vacant. Conversely the proposal which seeks to deliver 604sq.m would deliver an estimated 50 full time jobs (source; DJD Employment Densities Guide 2nd Edition 2010). This of course excludes those employment opportunities associated with maintaining the site (cleaners, security guards etc) as well as those involved in the construction phase.

Other Tangible Benefits

6.14 As part of the pre-application feedback received from Officers dated 10th June 2014 it was advised that the reduction in employment floorspace would also be considered in light of the other tangible benefits derived from the scheme (see para 4.5 of this Statement). In this context the following points are made;

- The improvement to the appearance of the site and by virtue of this the character and appearance of the conservation area achieved principally through the removal of the existing buildings and replacement with a high quality scheme.
- Efficient use of a vacant and under utilised brownfield site in a highly sustainable location.
- Increasing vitality within the immediate area and in particular the canal and Georgiana Street by bringing the site back into active use.
- The delivery of the Council's priority land use in the form of housing, including the provision of much needed affordable housing and in this context an above policy target contribution towards the tenure in greatest need i.e. rented accommodation.
- A financial contribution by way of local level and Mayoral CIL equating to £618,000; and
- The introduction of a development that achieves 35% carbon dioxide reductions which represents a vast improvement over the performance of current buildings.

HERITAGE

6.15 The accompanying Heritage & Townscape Appraisal describes how the proposed development responds to the historic context of the surrounding area and assesses the current and future impact of the site and proposal on the character and appearance of the Regents Canal Conservation Area. In addition, the Statement sets out the Applicant's intention to protect and enhance key elements of the historic environment and also identifies measures for mitigation and enhancement during and after the development process.

Table 4: Planning Policy & Proposal Compliance - Heritage

Policy Context	Policy Reference(s)	Compliance with Policy
<p>At the national and strategic levels there is a policy requirement to assess the significance of heritage assets to ensure that conflicts do not arise between proposals and assets. Proposals should be sympathetic in form and scale and protect and enhance the significance of heritage assets.</p> <p>Local policy seeks to ensure the Camden's buildings are attractive, safe and easy to use whilst preserving and enhancing the boroughs rich and diverse heritage assets and their settings. Development will be resisted where it is considered that harm would be caused to the heritage asset.</p>	<p>NPPF Paragraph 134</p>	<p>With respect to the acceptability of the replacement proposal and its ability to conserve and enhance the Conservation Area paragraphs 4.7 & 4.8 of the accompanying Heritage & Townscape Appraisal explain that, <i>"The proposed scheme will be a positive measure that will considerably enhance the character and appearance of this part of the Regent's Canal Conservation Area, and transform for the better the townscape of this part of the borough. It will also enhance the setting of the adjacent locally listed buildings on Royal College Street. It will do this by replacing buildings of no heritage or townscape merit on moribund site that presently detracts from the Regent's Canal Conservation Area, with a new development that is highly responsive to its surroundings. The scheme will greatly improve the quality of the urban environment on Georgiana Street, creating an active frontage on its northern side, and improving the appearance of the site over its present condition.</i></p> <p><i>The layout and massing of the proposed scheme respects the existing built form and urban grain of the area. The proposed buildings are arranged along Georgiana Street and the northern half of the site, leaving a large open space in the centre of the site, and thus helping to ensure a view towards the canal across the site from the terrace of locally listed buildings on Royal College Street. The scheme - unusually for recent canal- side developments - recovers the open aspect towards the canal that existed historically, and allowing the new development to permit an appreciation of how former wharf sites related to the canal in this part of the conservation area."</i></p> <p>In the context of potential harm to the Conservation Area paragraphs 5.8 and 5.9 explain that, <i>"The proposed scheme does not lead to 'substantial' harm or any level of 'less than substantial' harm to any designated heritage asset. As has been explained earlier, the proposal does very evidently not result in the 'total loss of significance' of the conservation area or any listed building. The only potential for 'less than substantial' harm would be if the proposed scheme for Bangor Wharf caused the loss of something central to the special interest of the Regent's Canal Conservation Area or the setting of nearby listed buildings. There is nothing about the proposal that would give rise to this level of harm."</i></p>
	<p>London Plan Policy 7.4</p>	
	<p>Core Strategy CS14</p>	
	<p>Development Policies DP25</p>	
	<p>Regent's Canal Conservation Area Management Strategy</p>	

DESIGN

6.16 The accompanying Design and Access Statement describes how the design of the scheme has evolved through the course of the pre-application process and how the proposals have been designed and developed having regard to the surrounding built and historic context and relevant planning policy objectives.

Table 9: Planning Policy & Proposal Compliance - Design

Policy Context	Policy Reference(s)	Compliance with Policy
<p>Design and Architecture</p> <p>There is an overall design objective for development proposals to achieve high quality, inclusive design that functions well and adds to the overall quality of the area. Policy also seeks to maximise the overall potential of sites to accommodate development.</p>	<p>NPPF Paragraph 57</p>	<p>The architect for the proposed scheme has been working closely with key stakeholders to develop a proposal which sensitively responds to the constraints and opportunities presented by the site and surrounding area. The development proposal has therefore been subject to a series of iterations and reflects pre-application discussions with representatives of Camden Council, key stakeholders, local businesses and local residents. The design rationale for the proposed scheme is based on the feedback received from pre-application discussions but also a comprehensive contextual analysis of the site and surrounding area. The constituent parts of the scheme and the rationale is set out fully within the accompanying DAS and summarised as follows;</p> <p>Layout - The proposal is comprised of 3 no. buildings (1, 2, 4, 5 and 6 storeys) forming a 'u' shape which is arranged around a courtyard space. The layout of the proposed buildings maintains views of the buildings that are deemed by the Council to make a positive contribution to the Conservation Area from the public realm. These include Constitution PH and the buildings at Eagle Wharf. The new pedestrian entry leading to the courtyard is wide and generous, providing new views from the street through to the canal. The frontage building pulls away from the site boundary near to the bridge to give another new view of the water from the street. The existing grain is reinforced through the arrangement of the new buildings. The layout opens up the wharf and the new buildings face onto the water, rather than away as at present. This will reconnect the wharf with the canal and improve the views of the site, both from the towpath and the waterway itself. This courtyard will provide public access to this side of the canal for the first time. It will also allow good levels of sunlight and daylight to the water to encourage biodiversity. It will maintain views of the majority of the roofscape of the rear of Royal College Street properties when viewed from the towpath, as well as views of the canal from most of the Royal College Street properties.</p> <p>Scale & Massing - The massing of the proposal creates two distinct buildings which front the canal, linked at ground/mezzanine level, and with a large open space between allowing views in and out of the development. Following earlier pre-application discussions, the height of the northern building was reduced in response to the three-storey Eagle Wharf, reducing it to five storeys rather than six. In terms of the immediate context, it was felt the relationship between the proposed massing and that of the existing building was key. Following the more recent pre-application discussions and public consultations, the height of the southern building was also reduced by one floor, making it five and six storeys rather</p>
	<p>London Plan Policy 5.3 Policy 7.4 Policy 7.6</p>	
	<p>Core Strategy Policy CS14 Policy CS17</p>	
	<p>Development Policies Policy DP22 Policy DP24</p>	
	<p>Supplementary Planning Guidance CPG 1 Design</p>	

		<p>than six and seven.</p> <p>Pre-application advice included comments on the stepped profile at the western end of the proposal on Georgiana Street and this has now been revised to include one step only. This simplifies the appearance and mediates the change of scale between no 54 and the proposal more successfully, whilst still allowing sufficient daylight to windows in the rear of the Royal College Street properties.</p> <p>Eagle Wharf has a closer relationship to the site: the existing and proposed buildings will be visible together from the towpath. The treatment of the adjacent building has been revised since the last pre-application advice. The bay has been enlarged to relate more directly to the proportion of the front elevation of Eagle Wharf and the form of the parapet has been simplified, again to make it relate more directly to its neighbour. The revised scale of the building on Georgiana Street, with one less floor, shows less contrast in scale with the existing. It is also notable that the Applicant has taken a conscious decision not to propose development on its boundary to Eagle Wharf thereby volunteering space to improve this building's setting.</p> <p>Appearance - The principal elevation onto Georgiana Street has been redesigned since the second pre-application submission. It has been reduced by one floor and the multiple stepping at the western end has been removed. The street elevation been rationalised and simplified so that the building meets the ground with a series of deep reveals or openings in the brickwork. These include the entrance passageway to the central courtyard, which is emphasised by four inset balconies immediately above. On the upper floors, the elevation is divided into a series of recessed panels in the brickwork which line through with the deep reveals at ground floor. Windows to the apartments are arranged within these panels, giving an ordered appearance. Balconies are deep-set with a simple glazed balustrade, emphasising their relationship with the site entrance below. The same treatment follows around the building as it turns to address St Pancras Way. At the western end, the flank wall set back from the boundary at third and fourth floor levels contains a number of blank window reveals to provide visual interest. This ordered brick elevation is capped by a fifth floor level which is set back from the frontage and clad in contrasting zinc. The revised treatment of the street elevation produces a calm and coherent appearance which will complement one of the buildings that make a positive contribution (The Constitution PH) and will improve and enhance the setting of the Conservation Area in this location.</p>
<p>Building Materials Development proposals should</p>	<p>London Plan Policy 7.4 Policy 7.6</p>	<p>Consideration has been given to the design, sustainability of the proposed buildings; and the context and appearance of the local area when choosing materials for the scheme. The materials chosen have been subject to and reflect discussion</p>

demonstrate high quality architecture through the use of design measures which including the use of materials; have regard to an areas local character.	Supplementary Planning Guidance CPG 1 Design	with Officers at LB Camden and the accompanying Design and Access Statement and section above provides justification in respect of how the materials have been used within the scheme.
	Core Strategy Policy CS6	
Amenity Standards Developments will be required to protect and where possible improve the amenity of existing and future residents. Development proposals should optimise the layout of development to optimise residential amenity.	London Plan Policy 3.5 Table 3.3	The proposal has where necessary mitigated against the impacts of air and noise pollution. The proposal protects residential amenity through the orientation and layout of the proposed buildings, which minimises the potential for overlooking and ensures that Daylight and Sunlight requirements are achieved through the proposal. Please refer to the supporting Design and Access Statement and Daylight and Sunlight Assessment prepared by CHP for further details.
	Core Strategy Policy CS6	
	Supplementary Planning Guidance CPG 2 Housing	In this respect the proposed buildings have been orientated to ensure all units are dual aspect, have views of the canal and importantly the Council's required distances are achieved in the context of neighboring properties. In addition it should be noted that proposed buildings maintain a minimum distance of 18m from habitable room windows to the rear of houses in Royal College Street.

TRANSPORT, PARKING & SERVICING

- 6.17 The accompanying Transport Statement demonstrates the how traffic arising from the proposed development will be accommodated and where applicable identifies proposed improvements to the highway network. The Transport Statement and accompanying Travel Plan set out the Applicant's intention to support sustainable patterns of movement.

Table 10: Planning Policy & Proposal Compliance - Transport, Parking & Servicing

Policy Context	Policy Reference(s)	Compliance with Policy
Transport (Overall) Proposals should encourage the opportunities for sustainable transport and encouraging sustainable patterns of movement.	NPPF Paragraph 29 and 32	The supporting Transport Statement assesses the impact of the proposal on the local highway network and concludes that the impact would be negligible as the application proposes a car free development. Indeed this represents an improvement over the current position whereby there is provision for at least 9 no. car parking spaces.
	London Plan Policy 6.1	
	Core Strategy Policy CS11	The implementation of a car free scheme is proposed at the site and reflects the high PTAL rating of 6a Excellent.
	Development Policies Policy DP16	The supporting Travel Plan identifies measures to encourage sustainable patterns of movement.

	Policy DP17	
	Supplementary Planning Guidance CPG 7 Transport	
Car Parking Planning policy states that development proposals should provide the minimum level of car parking necessary, encouraging car-free or car capped proposals to encourage sustainable patterns of movement.	NPPF Paragraph 39	The accompanying Transport Statement provides an assessment in respect of car parking standards and provision.
	London Plan Policy 6.13 Table 6.2	The development will be car free (as requested by Officers) and is therefore in accordance with relevant policy requirements. Notwithstanding there is an opportunity to introduce disabled parking at Georgiana Street for the wheelchair unit should this be required. This has again been discussed and agreed with Officers.
	Core Strategy Policy CS11	
	Development Management Policy DP18	
	Supplementary Planning Guidance CPG7 Transport	
Cycle Parking Proposals should actively manage patterns of growth and encourage sustainable patterns of movement through the promotion of public transport, walking or cycling. All developments should provide dedicated storage space for cycles.	NPPF Paragraph 17, point 11	The accompanying Transport Statement provides an assessment in respect of cycle parking standards and provision. In line with relevant policy standards the proposal makes provision towards cycle spaces in the form of 75 no. for the residential component and 7 no. for the office use.
	London Plan Policy 6.9	
	Core strategy Policy CS11	
	Development Policies Policy DP17	
	Supplementary Planning Guidance CPG7 Transport	

ENVIRONMENTAL CONSIDERATIONS

- 6.18 In the context of environmental considerations, the application is accompanied by an Acoustic and Vibration Assessment; Air Quality Assessment; Energy and Sustainability Assessment; Energy & Sustainability Assessment; Flood Risk Assessment; Contaminated Land Assessment and Arboricultural Assessment which identify and assess the application proposal against relevant

environmental-related requirements. Table 11 summarises the proposals compliance with planning policy.

Table 11: Planning Policy & Proposal Compliance - Environmental Considerations

Policy Context	Policy Reference(s)	Compliance with Policy
<p>Noise and Vibration Planning policy requires developments to manage and control noise and vibration to not exceed local level thresholds. Developments will be required to mitigate against the impact noise arising from the proposal and the surrounding area.</p>	<p>NPPF Paragraph 109 and 123</p>	<p>The accompanying Acoustic Assessment prepared by Sharps Redmore concludes that through the incorporation of appropriate mitigation measures in respect of both noise and vibration, the application proposal will not harm future users of the site or existing users in the surrounding local area.</p>
	<p>London Plan Policy 7.15</p>	
	<p>Development Policies Policy DP26 Policy DP28</p>	
<p>Air Quality The proposal is located within an Air Quality Management Area and will be expected to address local problems of air quality whilst mitigating against any air quality impact created by the proposed development.</p>	<p>NPPF Paragraph 124</p>	<p>The Air Quality Assessment produced by Mayer Brown identifies that providing good site practice and the implementation of measures outlined within the assessment, the overall residual effects of the construction phase on Air Quality will be slight adverse to negligible. The impacts of emissions from vehicles and plant associated with the construction phase are considered to be negligible, providing that suitable mitigation measures are put in place.</p>
	<p>London Plan Policy 7.14</p>	
	<p>Core Strategy Policy CS14</p>	
	<p>Development Policies Policy DP22</p>	
<p>Energy Planning policy seeks development proposals to reduce carbon emissions, currently by 35% and incorporate measures to promote sustainable development through the use of renewable energy technologies.</p>	<p>NPPF Paragraph 95 and 97</p>	<p>The supporting Energy and Sustainability Assessment prepared by CPW concludes that the building will achieve a 35% reduction in carbon emissions, in line with policy standards.</p>
	<p>London Plan Policy 5.2 Policy 5.7 Policy 5.8</p>	
	<p>Core Strategy Policy CS13</p>	
	<p>Development Policies Policy DP22</p>	

	Supplementary Planning Guidance CPG 3 Sustainability	
Flood Risk Planning policy requires the assessment of flood risk during the development of proposals to avoid inappropriate development in areas of high flood risk. Proposals will need to mitigate against surface water flood risk	NPPF Paragraph 100	The site is located within Flood Zone 1 and is identified as being at minimal risk from fluvial flooding. In addition, it is not considered that the site will increase flood risk elsewhere. The supporting Flood Risk Assessment and Sustainable Drainage Strategy prepared by Conisbee recommends that with the incorporation of the proposed drainage network strategy will provide a robust and sustainable drainage system for the proposed development.
	London Plan Policy 12 Policy 13	
	Core Strategy Policy CS13	
	Development Policies Policy DP22	
	Core Strategy Policy CS14	
	Development Policies Policy DP25	
Contaminated Land Planning policy requires the assessment of sites to identify potential risks and ensure that previously contaminated land does not activate 'leakage', spreading contamination.	NPPF Paragraph 120	The Ground Investigation Report prepared by GEA Ltd has not identified the presence of contamination and as a result of this, no remedial action should be required. Through the incorporation of appropriate mitigation measures as recommended, the proposal will not create any contamination risk
	London Plan Policy 5.21	
Trees Planning policy identifies a presumption in favour of the retention of trees. The planting of additional trees will be supported.	NPPF Paragraph 118	The supporting Arboricultural Impact Assessment prepared by Broadoak Trees identifies that the potential impact of development is very low in respect of the quality of trees removed and the potential risks to trees retained. Through the incorporation of appropriate mitigation measures and appropriate conditions, the proposal will not have any significant impact on either retained trees or the wider landscape.
	London Plan Policy 7.21	
	Core Strategy Policy CS15	

PUBLIC & PRIVATE AMENITY SPACE

- 6.19 The application proposal seeks to provide a significant provision towards public and private amenity space in this urban location. Amenity provision and landscape proposals are described in full within the accompanying Design & Access Statement and summarised below within Table 9.

Table 12: Planning Policy & Proposal Compliance - Public & Private Amenity Space

Policy Context	Policy Reference(s)	Compliance With Policy
<p>Planning policy places importance on access to open space and the provision of accessible areas of open space to meet the needs of future users. Proposals should tackle deficiencies and under-provision of open spaces and secure other opportunities for additional public space.</p>	<p>London Plan Policy 3.6</p> <p>London Plan Supplementary Planning Guidance</p> <p>Shaping Neighbourhoods: Play & Informal Recreation Supplementary Planning Guidance (2012)</p>	<p>The application proposes approximately 630 sq.m shared/public amenity space to be delivered through the provision of a new landscaped courtyard (484sqm) and Communal Roof Garden incorporating playspace (146sq.m).</p> <p>The proposed development will provide a total of 1,233sq.m amenity space. This level of amenity provision is achieved through the provision of 146sq.m of children play space, 484sq.m towards communal and public open space in the form of the landscaped courtyard and 603sq.m private amenity space for all apartments in the form of private balconies, terraces and for the wheelchair unit.</p> <p>In accordance with the requirements of CPG 6 and the Mayor's latest planning guidance, the provision of private amenity space either meets or exceeds the requirement for individual units. The requirement for children's playspace is 140 sq.m and again this policy requirement is exceed through the provision of an area measuring 146 sq.m.</p>
	<p>Core Strategy Policy CS15</p>	
	<p>Development Policies DP31</p>	
	<p>Supplementary Planning Guidance</p> <p>CPG 2 Housing CPG 6 Amenity</p>	

7. SUMMARY & CONCLUSIONS

- 7.1 The principle of a mixed-use scheme incorporating residential and office uses at the application site is accepted by relevant planning policy and this is reflected through discussions with Officers.
- 7.2 In line with national, regional and local level policy the proposal makes an efficient use of a poorly performing, existing office building to create employment opportunities through new and improved floorspace and high quality residential accommodation, including that for affordable to meet the Council's housing needs.
- 7.3 The proposal will result in a net reduction of 363 sq.m of office floorspace. This loss is negligible, particularly when consideration is given to the level of supply within the Borough and the contribution of the site currently i.e. that it is vacant. Other material circumstances relevant to this issue include;
- The existing premises no longer suit modern occupier requirements as evidenced through the building condition. This is reflected through the building's vacancy which in turn provides zero employment opportunities, as opposed to the proposal which is estimated to create 50 new full time jobs.
 - The proposal will deliver new and improved office floorspace for start up businesses and SME's and therefore represents a qualitative improvement over the current position.
 - The amount of employment floorspace has been derived in light of viability constraints and in particular the need to deliver much needed housing, including affordable housing.
 - The proposal brings about a number of other tangible benefits such as improvements to the appearance of the site and surrounding area, delivery of affordable housing, financial contributions, improved sustainability and facilitating public access to the canal through the provision of public open space in the form of a courtyard. All of which are valid considerations as advised by Officer through pre-application discussions.
- 7.4 Having regard to the above it is the case that the limited reduction of office floorspace which is required to deliver other priority uses will not unduly impact on the Council's overall policy objectives.
- 7.5 The design of the scheme has been sensitively developed in response to the local context, taking into consideration the diverse character areas of the surrounding local area whilst respecting the characteristics of the Regents Canal Conservation Area.

7.6 The scheme has been subject to extensive pre-application discussions and consultation with a range of stakeholders and in this regard reflects the outcome of these discussions. Notably the following amendments have been made;

- Reduction in the height of the building closest to Grays Inn Bridge from 7 to 6 storeys and the building closest to Eagle Wharf from 6 to 5 storeys.
- Increase in office floorspace to 604sq.m (resulting in a reduction of 363sq.m GIA); and
- Revision to elevational treatment of the proposed buildings, particularly those fronting Georgiana Street.

7.7 Specialist supporting reports in respect to technical policy matters have demonstrated that through the implementation of appropriate mitigation, the impact of the proposal on the surrounding local and historical environment will be low to negligible. It is therefore reasonable to conclude that the application proposal accords with all relevant policy objectives and should be granted planning permission.