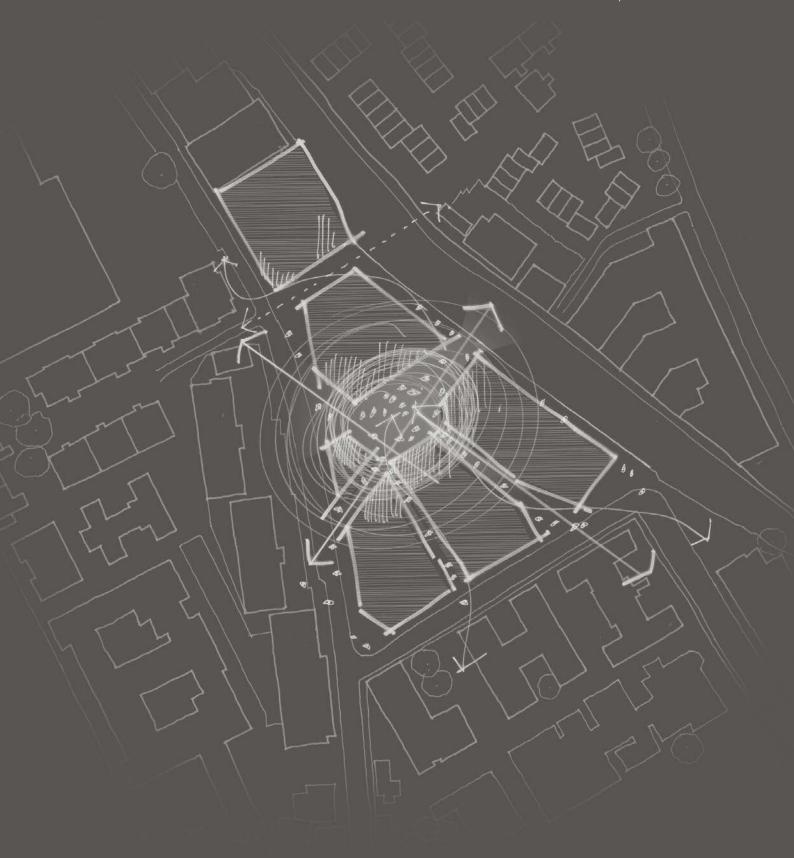
## Transformation of the Ugly Brown Building

DP9 Planning Statement

September 2017





# TRANSFORMATION OF THE UGLY BROWN BUILDING

2-6 St Pancras Way, London, NW1 0TB

**Planning Statement** 

September 2017



## THE UGLY BROWN BUILDING

## PLANNING STATEMENT

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## 1.0 INTRODUCTION

- 1.1 This Planning Statement is submitted in support of an application for planning permission and demolition of an unlisted building in a conservation area made on behalf of Reef Estates Limited (the "Applicant"), at 2-6 St Pancras Way, NW1 OTB (the "Site") within the London Borough of Camden ("LBC"):
- 1.2 Planning permission is sought for the following proposals (the "proposed development"):

"Demolition of the existing building and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use business floorspace (B1), residential (C3), hotel (C1), gym (D2), flexible retail (A1-A4) and storage space (B8) development with associated landscaping work".

- 1.3 The purpose of this Planning Statement is to explain the proposed development and provide an assessment of the proposed development against the relevant planning policies and guidance.
- 1.4 This statement should be read and considered in conjunction with the following documentation submitted as part of the application:
  - Affordable Housing Statement prepared by Gerald Eve;
  - Air Quality Assessment prepared by Waterman;
  - Arboricultural Assessment prepared by Aspect Arboriculture;
  - Basement Impact Assessment prepared by GDP;
  - BREEAM Stage 2 Pre-Assessment prepared by Max Fordham;
  - Community Infrastructure Levy Form prepared by DP9;
  - Daylight and Sunlight Report prepared by Waldrams;



- Design and Access Statement prepared by Bennetts Associates;
- Ecological Appraisal prepared by Aspect Ecology;
- Existing and Proposed Drawings prepared by Bennetts Associates;
- Flood Risk Assessment prepared by GDP;
- **Health Impact Assessment** prepared by Regeneris Consulting;
- Historic Environment Desk-Based Assessment (Archaeology) prepared by Waterman;
- Landscape Strategy prepared by Fabrik;
- Noise Assessment Report prepared by Waterman;
- Outline Construction Management Plan prepared by Waterman;
- Pedestrian Level Wind Desk-Based Assessment prepared by RWDI;
- Planning Application Form prepared by DP9;
- Preliminary Risk Assessment (Contamination) prepared by DTS Raeburn;
- Regeneration Statement prepared by Regeneris Consulting;
- Retail Impact Assessment prepared by DP9;
- Statement of Community Involvement prepared by LCA;
- Sustainability and Energy Statement prepared by Max Fordham;
- Townscape, Visual and Built Heritage Assessment prepared by Tavernor Consultancy; and
- Transport Assessment prepared by Caneparo Associates.
- 1.5 An affordable housing viability assessment prepared by Gerald Eve is submitted, under separate cover, on a strictly private and confidential basis.
- 1.6 It should be noted that LBC issued an EIA Screening Opinion (ref: 2017/1032/P) on 22 February 2017. The opinion concludes that the proposed development is not considered likely to have significant effects on the environment and is not 'EIA development' within the meaning of the 2011 Regulations (as amended 2015).

## Consultation

- 1.7 A comprehensive programme of consultation has been carried out during the evolution of the proposed development which has informed the design accordingly. Matters raised have been taken account of and incorporated within the proposed development where feasibly possible. Consultation has involved the following key groups:
  - Ward Councillors;
  - Residents' Associations;
  - Community Groups;
  - Greater London Authority (GLA);
  - Historic England;
  - Nearby owners;
  - Metropolitan Police; and
  - Neighbouring residents.

## Scope of Report

A description of the planning application site and surrounding area is provided within Section 2.0 and relevant planning history, a summary of pre-application discussions and the context to the proposals is set out in section 3.0. A description of the proposed development is provided in Section 4.0. An evaluation of the proposals against the planning policy context is set out in Sections 5.0 and 6.0. The regenerative benefits of the proposed development are set out in Section 7.0. Planning obligations are discussed in Section 8.0 and conclusions are drawn in Section 9.0.



## 2.0 SITE DESCRIPTION

## **The Application Site**

- 2.1 The 1.14 ha site is located between Camden Town and Kings Cross and bounded by St Pancras Way, Granary Street and the Regent's Canal.
- 2.2 The Site is triangular comprising a uniformly four-storey building with unbroken elevations. The total floor area of the existing building is 26,190sqm GIA or 30,836sqm GEA.
- 2.3 The Site is currently impermeable with no access either through it, or to the adjacent canal edge. The existing building creates a long and monotonous frontage to both St Pancras Way and the Regents Canal and is detrimental to the character of the area. The Site is identified, within the Regent's Canal Conservation Area Appraisal and Management Strategy (2007), as being a negative contributor in character and harmful to the character and appearance of the conservation area.
- 2.4 The existing single building is divided into three ownerships (Plot A, Plot B and Plot C), each of which is explained below:

Plot A

2.5 Plot A, owned by British Airways Pension Fund, is located to the north of the Site currently occupied by office accommodation with forecourt parking to St Pancras Way.

Plot B

2.6 Plot B is located to the centre of the Site. It is owned by fashion brand Ted Baker Plc and has been their headquarters since 2000. Office space is supported by undercroft parking at ground level.

Plot C

- 2.7 To the south of the Site, fronting Granary Street, is the largest of the three plots, containing a data centre operated by Verizon. The Site is secured by a fence and there is no access to the canal-side.
- 2.8 There are approximately 52 car parking spaces within the existing site, comprising 6 spaces at surface level accessed from St Pancras Way, 44 spaces at the ground floor of what is known as Plot B and 2 internally within Plot C. The existing parking is made available to Ted Baker, a current tenant of the site who will be retained as part of the proposed development.

## **LBC** Designations

- 2.9 The Site is located within the Regents Canal Conservation Area and has the following designations as identified on the LBC 2014 (with June 2017 alterations) Polices Map:
  - Adjacent to a Habitat Corridor (the Regents Canal);
  - Adjacent to Open Space (the Regents Canal);
  - Adjacent to Site of Nature Conservation Importance (the Regents Canal); and
  - South East corner within the lateral assessment area of the designated viewing corridor for the protected vista from Parliament Hill to St Paul's Cathedral.

## **Listed Buildings**

2.10 There are no statutorily listed buildings within the Site or in the immediate vicinity.
The hospital buildings, to the south of the Site, benefit from Certificates of Immunity from Listing.

## **Public Transport Connections**

- The Public Transport Accessibility Level ("PTAL") rating of the Site is predominantly 6b (a small proportion of Plot A is 6a) which indicates excellent public transport accessibility.
- 2.12 The Site is well served by local bus routes. The closest bus stops are Royal College Street Stops 'U' (eastbound) and 'N' (westbound) which are approximately 290m from the Site (3-4 minutes' walk).
- 2.13 The closest underground station to the Site is Mornington Crescent which is approximately 650m walking distance (7-8 minutes) to the west. It is served by the Northern Line which offers regular services between Morden and Edgware / High Barnet. Kings Cross St Pancras underground station is approximately 700m (8-9 minutes' walk) to the south of the Site, with several points of access provided in the locality. It is served by the Victoria, Northern, Piccadilly, Hammersmith & City, Metropolitan and Circle lines which all operate regular services towards numerous locations in London.



## 3.0 PLANNING HISTORY AND PRE-APPLICATION PROCESS

## **Relevant Planning History**

3.1 A full planning history search for the Site has been undertaken using LBC's online search facility and there have been no applications of relevance in relation to comprehensive redevelopment of the Site.

## **Pre-Application Process**

- 3.2 A series of pre-application meetings have been undertaken with LBC Planning and Design officers. Separate focused sessions have also been undertaken with LBC Highways and Energy / Sustainability officers. Discussions commenced in February 2016 and have been ongoing for the duration of the pre-application period.
- 3.3 The proposed development has also been formally presented to LBC's Design Review Panel ("DRP") on two occasions, presented to LBC's Development Management Forum ("DMF") and LBC's Developer's Briefing ("DB").
- In addition to the above formal pre-application process, a further comprehensive programme of consultation has been carried out during the development of the proposed development that has informed the application proposals. Consultation has involved the following key groups and is set out in full in the accompanying Statement of Community Involvement prepared by LCA:
  - Ward Councillors;
  - Residents' Associations;
  - Community Groups;
  - Greater London Authority (GLA);
  - Historic England;



- Metropolitan Police;
- Nearby owners; and
- Neighbouring residents.
- 3.5 The consultation activities that have taken place are in accordance with the London Borough of Camden's own revised Statement of Community Involvement in Planning (2016) and reflect the principles for consultation in the Localism Act (2011) and in the National Planning Policy Framework ("NPPF") (2012).
- 3.6 The Applicant has fully considered the feedback received throughout the consultation process and, where possible, has responded to and incorporated this feedback within the proposals. Changes made in response to consultation comments are set out in full in the accompanying Design and Access Statement, prepared by Bennetts Associates, and are broadly summarised below:
  - Revisions to heights of the buildings across the proposed development;
  - Opening-up public access to the canal through new open spaces and pedestrian routes;
  - Softened shape, changed layout and reduced massing of buildings to marry better with the existing character of area;
  - Ensuring Ted Baker is the central focus of the Site; and
  - The removal of a second hotel.



#### 4.0 PROPOSED DEVELOPMENT

The proposed development includes the demolition of the existing building and its replacement with six buildings of mixed uses and accompanying public open space and pedestrian routes across the Site and alongside the Regents Canal. The key building at the centre of the Site will be the new global headquarters for Ted Baker PLC and will include a Ted Baker branded hotel. Other buildings will contain business workplace, residential accommodation, gym facilities and storage space, with supporting retail and restaurant uses at ground level.

4.2 The full description of the proposed development is as follows:

"Demolition of the existing building and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use business floorspace (B1), residential (C3), hotel (C1), gym (D2), flexible retail (A1-A4) and storage space (B8) development with associated landscaping work".

4.3 The proposed development, as per the existing building, comprises 3 distinct elements (Plot A, Plot B and Plot C).

## Plot A

- 4.4 The seven-storey building on Plot A fills the smaller northern end of the Site and shares a party wall with the existing buildings situated on St Pancras Way.
- 4.5 Flexible retail space and a business reception is provided at ground floor level with six floors of business floorspace accommodation located above.

## Plot B

- 4.6 Plot B, at the centre of the Site, will be a nine-storey building above ground with a single, split level basement.
- 4.7 The first Ted Baker branded hotel will be a high quality boutique hotel comprising 87 rooms with associated bar, restaurant and back of house support space located at ground, first and second floor levels.
- 4.8 The main body of Ted Baker's headquarters will sit above the hotel and will comprise circa 1,200 desk spaces (by comparison to only 600 within the existing headquarters), meeting rooms, breakout spaces and other ancillary functions.

#### Plot C

- 4.9 Plot C, to the south of the Site, is broken down into 3 smaller plots by significant public routes and spaces.
- 4.10 The three buildings are orientated to maximise canal frontage and to minimise the impact of their bulk to the south. The three buildings are conceived as a family and share rhythms and materials.
- 4.11 Plot C comprises flexible retail space at ground floor level with business floorspace and residential accommodation above.

## **Phased Development**

The proposed development is intended to come forward in three subsequent phases. As follows:

 Phase 1 comprises the redevelopment of Plot A with construction targeted for 2018-2020;



- Upon the completion of Phase 1 Ted Baker will temporarily relocate to Plot A
  to allow Plot B (Phase 2) to be developed. The construction for Phase 2 is
  targeted for 2020-2022);
- Upon completion of Phase 2 Ted Baker will move into their new permanent HQ at Plot B. Phase 3 (redevelopment of Plot C) will then commence with construction targeted between 2022-2025.

## **Proposed Residential Use**

**Unit Mix** 

- 4.12 The proposed development comprises 69 residential units.
- 4.13 A breakdown of the mix of unit sizes proposed is provided in Table 1 below:

Table 1 - Mix of Residential Units

Unit Type	Number	Mix
Studio	11	16%
1 Bedroom	25	36%
2 Bedroom	24	35%
3 Bedroom	9	13%
4 Bedroom	0	0%
Total	69	100%

- 4.14 In terms of tenure, 35% of the proposed residential development is affordable housing and 65% market sector (in terms of floor area).
- 4.15 Of the affordable housing provision 55% is social-affordable rented and 45% intermediate (in terms of floor area).



4.16 The unit mix per tenure is set out in full in the Table 2 below:

**PLANNING STATEMENT** 

**Table 2 – Unit Mix Per Tenure** 

Market Sector Units				
	Number of Units	Percentage		
Studio	11	22%		
1-bed	25	49%		
2-bed	14	27%		
3-bed	1	2%		
Private Total	51	100%		
Intermediate Unit	s			
1-bed	0	0%		
2-bed	4	50%		
3-bed	4	50%		
Intermediate	8	100%		
Total				
Social / Affordable	Rented Units			
1-bed	0	0%		
2-bed	6	60%		
3-bed	4	40%		
4-bed	0	0%		
Affordable	10	100%		
Rented Total				

Layout

4.17 All units meet the London Plan dwelling space standards and Lifetime Homes standards. Furthermore, the residential dwellings will be compliant with the Building Regulations Approved Document 'M'.



Private Amenity Space

4.18 All residential units have private outdoor terraces or projecting balconies except for four studio apartments which enjoy Juliet balconies with south facing views.

## **Proposed Commercial Uses**

- 4.19 The proposed development comprises, in addition to the residential units, a mix of the following commercial uses across the proposed development:
  - Business floorspace, including new Ted Baker Headquarters (Use Class B1);
  - Flexible retail floorspace (Use Classes A1-A4);
  - Gym (Use Class D2);
  - Ted Baker branded 87 bedroom hotel (Use Class C1); and
  - Basement storage (Use Class B8).

## **Quantum of Development**

4.20 The total floor area of the proposed development is set out in Table 3 on the following page.

Table 3 – Quantum of Proposed Floorspace

Use	GIA sqm	GEA sqm
Business Floorspace (B1)	55,079	57,262
Residential (C3)	7,110	7,704
Flexible Retail (A1-A4)	5,805	6,350
Gym (D2)	1,376	1,428
Hotel (C1)	4,625	5,237
Basement Storage (B8)	6,081	6,377
TOTAL	80,076	84,358

## **Public Realm and Communal Amenity Space**

- 4.21 The proposed development comprises a high quality public realm including a central main plaza and several new pedestrian routes through the Site.
- 4.22 The proposed public realm is made up of several key character areas as follows which are explained in detail within the accompanying Landscape Strategy prepared by Fabrik:
  - Central Plaza;
  - Retail Street;
  - Canal Frontage;
  - Front Garden;
  - North Street;
  - Street Frontage.
- 4.23 Throughout the public realm, across the character areas, soft landscaping and high quality hard landscaping materials are proposed. In respect of soft landscaping, the proposed trees have been selected with regard to the specific site context



within the public realm spaces and will contribution to both biodiversity and place making.

- 4.24 In respect of smaller plants, shrubs and grasses, the indicative planting palette proposed by Fabrik reflects the environmental conditions expected in the planting locations, whilst also complementing the aesthetic of the hard landscape materials and architectural palette.
- 4.25 The public realm has been designed to provided accessibility for everyone and successfully negotiates the approximate 2m level change from the canal edge to St Pancras Way by providing a fully accessible step free route across the Site through the main plaza. The retail street (within Plot C), the northern street (adjacent to Plot A) and the new canal footpath also offer fully accessible step free routes into and through the Site.
- 4.26 The public realm comprises 315sqm of on-site playspace for children aged 0-5 years of age.

## **Servicing & Parking**

## Car Parking

4.27 The development comprises 32 off-street car-parking spaces. 30 spaces are in the basement of Plot B with a further 2 on-site wheelchair accessible car parking spaces on Plot C (accessed from Granary Street). This represents a significant reduction of spaces overall compared to the existing situation.



Cycle Parking

4.28 808 long stay cycle parking spaces and 104 short stay cycle parking spaces, within the public realm, are to be provided. Long-stay cycle parking will be provided in secure and sheltered areas at basement and ground floor level at each Plot. Showers, lockers and changing facilities for staff will also be provided.

Servicing

- 4.29 Deliveries and servicing for the Site will be a mix of on-street and off-street facilities. The proposal includes a footway loading bay on St Pancras Way at the frontage of the Site which will primarily serve Plot A.
- 4.30 Servicing for Plot B will be undertaken predominantly from the basement car park by small to medium sized goods vehicles. Larger vehicles will make use of the new footway loading bay on St Pancras Way.
- 4.31 Deliveries and servicing for Plot C will be undertaken from an off-street service yard to the south of the plot which will be at ground floor level and accessed from Granary Street.

## **Energy and Sustainability**

4.32 The proposed development achieves a 35% reduction in carbon emissions of Part L. This is due to the use of the enhanced building fabric, efficient mechanical and electrical systems and the use of district heating through all buildings on Site. The proposed development also utilises all available roof area for photovoltaic panels to maximise renewable energy generation where possible. The proposed development targets to achieve a BREEAM 'Excellent' rating.



## 5.0 PLANNING POLICY CONTEXT

## The Decision-Making Framework

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Acts, decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 In this instance the Development Plan for the Site comprises the following:
  - London Plan (March 2016); and
  - Camden Local Plan (June 2017).

#### **Material Considerations**

- 5.3 The NPPF was published on 27 March 2012 and sets out the Government's economic, environmental and social planning policies.
- At the heart of the NPPF is a presumption in favour of sustainable development and the core planning principles include, inter alia, to "drive and support development" and to "encourage" the reuse of existing resources. This means approving development proposals that accord with the Development Plan without delay unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.
- 5.5 The NPPF is a material consideration in the assessment of all planning applications.



In addition to the Development Plan and the NPPF, the following guidance documents are important material considerations and their content has been considered during the evolution of the proposed development:

National Planning Policy and Guidance

National Planning Policy Guidance (2014);

Regional Planning Policy and Guidance

- Affordable Housing and Viability SPG (2017);
- Housing SPG (2016);
- London View Management Framework ("LVMF") (2012);
- Play and Informal Recreation SPG (2012); and
- Sustainable Design and Construction SPG (2014).

Local Planning Policy and Guidance

- CPG 1 Design (2015);
- CPG 2 Housing (2016);
- CPG 3 Sustainability (2015);
- CPG 6 Amenity;
- CPG 7 Transport; and
- CPG 8 Planning Obligations (2015).



## 6.0 Planning Policy Assessment

6.1 This section assesses the application proposals against the relevant planning policies set out in the Development Plan and other material planning guidance.

## Principle of Land Use

Mixed Use

- 6.2 Local Plan Policy G1 sets out that LBC will expect the provision of a mix of use, including an element of self-contained housing where possible.
- 6.3 Policy G1 also states that development should provide the most efficient use of land and that LBC will support development that makes best use of sites considering, inter alia:
  - Quality of design;
  - The site surroundings;
  - Sustainability;
  - Amenity;
  - Heritage; and
  - Transport accessibility.
- The proposed development has evolved over a period of time in consultation with several key stakeholders. The proposed composition of land uses is rich and considered to comply with the requirements of the Local Plan. Set out in the following paragraphs (6.5-6.41) are details of the proposed land uses, which are considered to deliver the most efficient use of the Site in the context of the considerations listed in Policy G1.



#### Commercial Uses

## **Business Floorspace**

- 6.5 London Plan Policy 4.1 states that the Mayor will work with partners to promote and enable the continued development of a strong, sustainable and diverse economy across all parts of London.
- 6.6 Local Plan Policy G1 sets out that LBC has an objectively assessed need (to 2031) for the delivery of 695,000sqm of office floorspace.
- 6.7 Local Plan Policy E2 states that LBC will consider higher intensity redevelopment of premises or sites that are suitable for continued business use if, inter alia:
  - The level of employment floorspace is increased or at least maintained;
  - The redevelopment retains existing businesses on the site as far as possible,
     and
  - The proposed development includes other priority uses, such as housing, affordable housing and open space.
- 6.8 Local Plan Policy E1 states that LBC will support businesses of all sizes, in particular, start-ups, small and medium sized enterprises and maintain a stock of premises that are suitable for a variety of business activities for forms of differing sizes.
- 6.9 The existing Site comprises 26,190sqm GIA or 30,835sqm GEA of office and data centre floorspace. The proposals for a higher intensity redevelopment of the Site (comprising 55,079sqm GIA or 57,262sqm GEA of business floorspace) is in accordance with the requirements of Local Plan Policy E2 given the following:



- The level of employment will be increased significantly (by circa 3,740 on-Site jobs) as set out in the accompanying Regeneration Statement prepared by Regeneris Consulting;
- The proposed development retains existing businesses on the Site as far as possible. The delivery of the new Ted Baker Headquarters will allow Ted Baker to remain, and grow, within the borough;
- The proposals include significant provision of other priority uses including housing, affordable housing and public open space.
- 6.10 Furthermore, the provision of a significant uplift in business floorspace at the Site is in accordance with London Plan Policy 4.1 and Local Plan Policy G1 which seek to promote a strong economy and deliver additional office and employment floorspace within the borough. The high-quality business floorspace comprises a variety of workspace across the three Plots. The buildings are designed (as set out in Section 7 of the accompanying Design and Access Statement) to provide provide flexible space which can accommodate a variety of potential occupiers from small and medium enterprises to larger tenants.
- 6.11 As such, the proposed development is considered to be wholly in accordance with the relevant policies of the London and Local Plans in respect of the delivery of new and additional business floorspace.

## <u>Retail</u>

- 6.12 Local Plan Policy G1 sets out that LBC has an objectively assessed need (to 2031) for the delivery of circa 30,000sqm of retail floorspace.
- 6.13 Local Plan Policy TC1 sets out that LBC will focus new shopping and related uses in Camden's designated growth areas and existing centres, having regard to the level of capacity available in these locations. TC1 also sets out that LBC will apply a



sequential approach to retail and other town centre uses outside of the areas listed above to support Camden's network of centres. Only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations. The Council will require a retail impact assessment for large retail development proposals (of 2,500 sqm or more) that are not in accordance with this above approach.

- 6.14 The proposed development comprises 5,805sqm GIA or 6,350sqm GEA of flexible (Use Class A1-A4) retail floorspace. As such, a Retail Impact Assessment has been prepared by DP9 and accompanies the planning application submission.
- 6.15 The Retail Impact Assessment sets out that the retail elements of the proposals are an integral, and ancillary, element of this mixed-use development. They are designed to serve the needs of current and future residents and workers. They also play an important place making function, and create active frontages which will enhance the quality of the office and residential uses.
- 6.16 The existing area is very poorly served by everyday local shopping facilities. The nearest local parade at Crowndale Road has a very limited, poor quality offer. There are no quality local retail offerings within an easy walking distance of the Site and there is a clear qualitative and qualitative need for the scale of retail floorspace proposed.
- 6.17 The Retail Impact Assessment looks at the potential impacts of the proposed flexile retail floorspace (Use Classes A1-A4), based on alternative scenarios, and the exercise demonstrates that they will have a negligible impact on any nearby town centre. The proposals will provide additional local choice and competition, and create additional local employment.



6.18 In these circumstances, and for detailed reasoning set out in the accompanying Retail Impact Assessment, it is considered that the retail elements of the proposed development are in accordance with the relevant national, regional and local planning policies for town centre uses.

## <u>Hotel</u>

- 6.19 London Plan Policy 4.5 sets out that the Mayor, London Boroughs and relevant stakeholders should support London's visitor economy, stimulate its growth and seek to achieve 40,000 net additional hotel bedrooms by 2036.
- 6.20 Local Plan Policies E1 and E3 sets out that LBC recognise the importance of the visitor economy in Camden and will support tourism development and visitor accommodation. LBC seek to direct tourism accommodation towards Central London and the Town Centres however will consider tourism development outside of these areas where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough.
- 6.21 Policy E3 also sets out that all tourism development and visitor accommodation must:
  - Be easily reached by public transport;
  - Provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary; DP9 query for Caneparo Associates. How is this best answered, in the context of discussions that were held with LBC highways officers at pre-application stage?
  - Not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems; and
  - Not lead to the loss of permanent residential accommodation.



- 6.22 The proposed development includes a small, first of its kind, Ted Baker branded hotel (87 bedrooms). Given the modest size of the hotel and association with the Ted Baker brand, of which the new headquarters is proposed at the centre of the Site, it is considered that the proposed hotel use is wholly acceptable in this location, despite being situated outside of Central London and the town centres.
- 6.23 Furthermore, the proposed hotel would have excellent transport links and would not harm the balance and mix of uses in the area, the local character, residential amenity, services for the local community, the environment or transport systems (given its modest size). In addition, the proposed hotel would not lead to the loss of any permanent residential accommodation on site.
- 6.24 It should be noted that it was discussed, and agreed with LBC Highways officers during pre-application discussions that a dedicated taxi facility is not considered necessary or appropriate and that taxi pick-up/drop-off could take place on-street in accordance with existing restrictions. Furthermore, it was discussed and agreed that the provision of coach parking would also not be appropriate in this instance. Given the size and nature of the hotel coach trips are unlikely and can be discouraged if necessary. Furthermore, there are no conferencing facilities at the hotel, which is often a generator of coach parties/travel.
- 6.25 Given the above, the proposed development is considered to accord with Local Plan Policies E1 and E3 in respect of the provision of hotel accommodation.
- 6.26 It should be noted that the GLA stated in pre-application correspondence that the Ted Baker hotel, given its modest size and association with the existing occupier on Site is supported.



## Gym

- 6.27 Local Plan Policy C3 sets out that LBC will seek new opportunities for leisure facilities in major mixed used developments.
- 6.28 Local Plan Policy E1 recognise the importance of other employment generating uses including leisure uses.
- 6.29 Local Plan Policy C1 sets out that LBC will promote healthy communities with measures to help contribute to healthier communities to be incorporated in a development where appropriate.
- 6.30 The proposed development comprises a gym (Use Class D2) measuring 1,376sqm GIA or 1,428sqm GEA. The proposed gym will provide leisure and employment opportunities whilst promoting healthier living, in accordance with Local Plan Policies C1, C3 and E1.

#### Storage

- 6.31 Local Plan Policy E1 sets out that LBC will maintain a stock of premises that are suitable for a variety of business activities. Policy E2 sets out that LBC will encourage the provision of employment premises and sites in the borough. Para 5.5 of the Local Plan clarifies that the terms 'business' and 'employment' are used in the Local Plan to refer to several uses, including storage and distribution uses (Use Class B8).
- 6.32 The proposed development comprises basement storage floorspace (Use Class B8) measuring 6,081sqm GIA or 6,377sqm GEA. The proposed storage floorspace will provide diversity in respect of the business and employment opportunities



provided within the proposed mixed use development and as such is in accordance with Local Plan Policies E1 and E2.

## Proposed Residential Use

- 6.33 The NPPF seeks to significantly boost the supply of housing.
- 6.34 London Plan Policy 3.3 seeks to achieve provision of at least 42,000 net additional homes each year across London. Table 3.1 identifies that LBC has a target to provide 889 net additional homes annually and 8,892 homes between the ten-year period 2015-2025. Local Plan Policy G1 sets out that LBC has an objectively assessed need (to 2031) for the delivery of 16,800 additional homes.
- 6.35 Local Plan Policy H1 sets out that LBC will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 2030/31.
- 6.36 Local Plan Policy H2 sets out that where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses and in all parts of the borough LBC will encourage the inclusion of self-contained homes in non-residential development. Policy H2 also states that in the Central London Area and town centres, LBC will require 50% of all additional floorspace to be self-contained housing, subject to various considerations.
- 6.37 The Site is not within the Central London Area, nor is it within a town centre. As such, the 50% target set out in Local Plan Policy H2 is not applicable in respect of the proposed development. Notwithstanding this, the Applicant has sought to provide the maximise amount of residential accommodation possible within the proposed development.



- In determining the most appropriate mix of uses and the maximum amount of residential accommodation that can be provided, the Applicant has considered several proposed alternative options for the Site (as explained in detail in Section 2.9 of the accompanying Design and Access Statement). These options have been reviewed and assessed in the context of the following considerations that are set out, inter alia, in Policy H2 of the Local Plan:
  - The site size and constraints;
  - Compatibility of adjacent uses;
  - The need to add to community safety by providing an active street frontage and natural surveillance;
  - The extent of additional floorspace needed for the existing user (Ted Baker);
     and
  - The impact of a mix of uses on the efficiency and overall quantum of development.
- 6.39 The central component of the proposed development is the delivery of a new Ted Baker HQ which will allow the company to remain and grow within the London Borough of Camden. It is a key requirement that Ted Baker can retain a presence at the site for the duration of the construction period (rather than have to temporarily relocate elsewhere in London). As such, the office accommodation at Plot A is to be built out first. Ted Baker will then temporarily occupy Plot A whilst Plot B is developed as their permanent HQ. Upon completion of Plot B Ted Baker will move into Plot B permanently and a new office tenant / tenants will occupy Plot A. Given the requirements of Ted Baker both Plots A and B need to comprise office accommodation and there is, therefore, no opportunity to provide residential accommodation within these parts of the Site.
- 6.40 Plot C, however, provides the opportunity to deliver residential accommodation and this Plot comprises a mix of both residential and office accommodation



accordingly. The Applicant and Bennetts Associates, in discussion with LBC officers, have explored options of achieving a greater quantum of residential accommodation, by comparison to that which is proposed under this application. Several options have been drawn up and reviewed in detail. Unfortunately, each option suffers from one or more design issues, as explained in the Design and Access Statement, which render them unfeasible.

The proposed development for which planning permission is sought, therefore, represents the optimum land use mix given the site-specific constraints and context and the Phasing requirements of Ted Baker. The proposed land use mix makes the most efficient use of the proposed buildings and floor areas – the composition and layout of which have been informed by positive discussions with LBC Design Officers and the DRP.

## **Residential Density**

6.42 Local Plan Para 2.9 states that LBC will expect the density of housing development to take account of the density ranges set out in the London Plan's Sustainability Residential Quality density matrix which is copied, at Table 4 on the following page:



Table 4 - London Plan Density Ranges

Setting	Public Transport Accessibility Level (PTAL)			
	0 to 1	2 to 3	4 to 6	
Suburban	150-200 hr/ha	150-250 hr/ha	200–350 hr/ha	
3.8-4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha	
3.1-3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha	
2.7-3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha	
Urban	150–250 hr/ha	200-450 hr/ha	200–700 hr/ha	
3.8 –4.6 hr/unit	35–65 u/ha	45-120 u/ha	45–185 u/ha	
3.1-3.7 hr/unit	40-80 u/ha	55–145 u/ha	55–225 u/ha	
2.7-3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha	
Central	150-300 hr/ha	300-650 hr/ha	650–1100 hr/ha	
3.8-4.6 hr/unit	35–80 u/ha	65–170 u/ha	140-290 u/ha	
3.1-3.7 hr/unit	40–100 u/ha	80-210 u/ha	175–355 u/ha	
2.7-3.0 hr/unit	50–110 u/hr	100-240 u/ha	215-405 u/ha	

- Para 2.9 also states that LBC will refer primarily to dwelling densities measured in units per hectare (rather than habitable rooms per hectare) and will expect densities towards the higher end of the appropriate density range in the matrix. Para 3.34 of the Local Plan states that the density matrix should be a guide, rather than a prescriptive tool and will be applied flexibly. Para 3.28 of the London Plan also states that it is not appropriate to apply Table 3.2 mechanistically and that "Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential local context, design and transport capacity are particularly important".
- The GLA Housing SPG (2016) sets out, at Para 1.3.70, the methodology for calculating residential density in vertically mixed schemes (i.e. where housing is on top of non-residential uses). In this instance the size of the Site is to be reduced by an amount that is equivalent to the proportion of total floorspace allocated to non-residential uses before calculating residential density in the normal way. The SPG provides a worked example, the methodology of which has been applied to the proposed development and is set out at Table 5 on the following page:



Table 5 - Residential Density Calculation

Total Site Area	1.14ha
Residential GIA	7,110 sqm (9%)
Non-Residential GIA	72,966 sqm (91%)
Reduced Site Area	0.1ha
Number of Dwellings	69
Density*	690 u/ha

<sup>\*</sup>Density calculation based on 9% of the site area (reducing the site area by 91% - the proportion of proposed non-residential floorspace).

6.45 The proposed development is within a Central Area with a PTAL rating of 6. London Plan Table 3.2 sets out a maximum target density of 405 u/ha within such a location. The residential density of the proposed development is 690 u/ha and, therefore, exceeds the figures set out in Table 3.2. Notwithstanding this, the proposed density is considered wholly acceptable in the context of the proposed mixed use development when considered in the round. The London Plan figures are a guide and should not be applied mechanistically. Furthermore, LBC planning policy seeks to maximise the delivery of housing on mixed use sites and the GLA confirmed, during pre-application discussions, that a high-density development is supported in this location.

## **Affordable Housing**

6.46 London Plan Policy 3.12 highlights that there is a need to encourage, rather than restrain, residential development and that the maximum *reasonable* amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes. In determining the maximum reasonable amount negotiations on sites should take account of their individual circumstances including development viability.



- 6.47 Local Plan Policy H4 sets out that LBC will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17 2030/31, and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. As such, LBC expect a contribution to affordable housing from all developments that include an uplift in residential floorspace of 1,000sqm GIA or more. LBC seek to negotiate the maximum reasonable amount of affordable housing with an affordable housing target of 50% being applied to developments with capacity for 25 or more additional dwellings. For developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site.
- In respect of affordable housing typologies, the guideline mix, as set out in Local Plan Policy H4, is for 60% to be social-affordable rented housing and 40% to be intermediate housing. In determining the appropriate mix for an individual site, LBC will consider, the impact of the mix of housing types on the efficiency and overall quantum of development. CPG 2 (Housing) sets out that the provision of affordable housing (and split between social-affordable rented housing and intermediate housing) should be based on floor area rather than unit numbers or habitable rooms.
- 6.49 The proposed development comprises 35% affordable housing based on floor area (both GEA and GIA). This equates to 18 residential units (10 of which are social-affordable rented and 8 of which are intermediate). This proposed quantum and mix of affordable housing has been informed by viability testing undertaken by Gerald Eve (submitted under separate cover on a strictly private and confidential basis). The Viability Assessment concludes that 35% affordable housing by site area is the maximum reasonable level of affordable housing on site whilst providing competitive returns to a willing land owner and willing developer to enable the development to remain deliverable.



## **Residential Unit Size Mix**

- 6.50 The NPPF encourages the delivery of a wide choice of high quality homes, based on current and future demographic trends, market trends and the needs of different groups in the community.
- 6.51 London Plan Policy 3.8 states that Londoners should have a genuine choice of homes that meet their requirements for different sizes and types of dwellings in the highest quality environments.
- 6.52 Local Plan Policy H6 sets out that LBC will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and a variety of housing suitable for Camden's existing and future households.
- 6.53 Local Plan Policy H7 sets out that LBC will aim to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities. LBC will seek to ensure that all housing development;
  - Contributes to meeting priorities set out in the Dwelling Size Priorities Table
     (copied at Table 6 below); and
  - Includes a mix of large and small homes.

**Table 6 – Dwelling Size Priorities** 

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower



THE UGLY BROWN BUILDING



- 6.54 LBC acknowledge that a flexible approach, to assessing the mix of dwelling sizes, should be adopted and each proposal considered on its own merits and characteristics. Para 3.191 of the Local Plan states that LBC acknowledges that it will not be appropriate for every development to focus on the higher priorities. However, all developments should contribute to the creation of mixed communities by containing a mix of large and small homes.
- 6.55 The application proposes 69 residential units comprising a range of unit sizes including several family sized units as set out in Table 7 on the following page.



**Table 7 – Mix of Residential Units** 

Market Sector Units				
	Number of Units	Percentage		
Studio	11	22%		
1-bed	25	49%		
2-bed	14	27%		
3-bed	1	2%		
Private Total	51	100%		
Intermediate Units				
1-bed	0	0%		
2-bed	4	50%		
3-bed	4	50%		
Intermediate	8	100%		
Total				
Social / Affordable	Rented Units			
1-bed	0	0%		
2-bed	6	60%		
3-bed	4	40%		
4-bed	0	0%		
Affordable Rented	10	100%		
Total				

6.56 The design of the proposed development seeks to provide a rich mix of residential accommodation whilst mediating between the ambition to deliver a high proportion of affordable housing and maximise the number of residential units overall within an acceptable massing.

- 6.57 The scheme delivers a large proportion of 2 and 3 bedroom units across the scheme, with unit sizes generally larger than minimum space standards requirements.
- 6.58 Overall, the development provides a balance of housing types and mix, including an appropriate amount of family housing that is appropriate for the Site's location.

  The proposals are therefore compliant with the NPPF and relevant London Plan and Local Plan Policies.

### **Housing Quality**

- 6.59 London Plan Policy 3.5 sets out that London Boroughs should apply minimum space standards that generally accord with the dwelling space standards set out in Table 3.3 of the London Plan.
- 6.60 Local Plan Policy H6 sets out that LBC will seek to secure high quality accessible homes in all developments and will expect all dwellings to comply with nationally prescribed space standards.
- 6.61 London Plan Policy 3.8 and Local Plan Policy H6 require ninety percent of new housing to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and ten per cent of new housing to meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.
- As set out in Appendix A of the accompanying Design and Access Statement, prepared by Bennetts Associates, all units meet the London Plan dwelling space standards and Lifetime Homes standards. Furthermore, the residential dwellings will be compliant with the Building Regulations Approved Document 'M'. As such,

the proposed development is in accordance with the relevant policies of the London and Local Plans in respect of space standards and unit sizes.

# **Amenity and Playspace**

- Para 6.50 of the Local Plan sets out that LBC will give priority to securing suitable provision of playspace for children and young people and an appropriate level of amenity space for the occupiers of a development.
- 6.64 CPG 6 (amenity) states out that LBC's priority is for the provision of public open space on site.
- 6.65 Figure 2 of the CPG 6 (Amenity) sets out the following requirements in respect of open space as summarised in Table 8 below:

Table 8 – LBC Open Space & Playspace Requirements

Self-contained homes in Use Class C3	Amenity open space	Children's play space	Natural green space	Total
One bedroom home	6.5 sq m		5.2 sq m	11.7 sq m
Two bedroom home	9.2 sq m	0.6 sq m	7.2 sq m	17.0 sq m
Three bedroom home	12.8 sq m	2.9 sq m	9.5 sq m	25.2 sq m
Four bedroom home	14.1 sq m	3.6 sq m	10.2 sq m	27.9 sq m
Student housing, hotels and hostels				
Single room	5.0 sq m		4.0 sq m	9.0 sq m
Double room	10.0 sq m		8.0 sq m	18.0 sq m
Commercial/ higher education development				
Per 1,000 sq m gross external area	21.6 sq m		17.9 sq m	38.9 sq m





6.66 The accompanying Landscaping Strategy, prepared by Fabrik, sets out a detailed assessment of the planning policy requirements (in respect of both the Local Plan and the GLA) and how the proposed development has responded to the requirements accordingly.

6.67 In summary, the proposed development provides high quality open space and playspace that is integral to the proposed development. The quantums proposes are broadly in accordance with the planning policy requirements and are the maximum achievable in the context of the proposed development as a whole.

In addition to outdoor communal amenity space, high quality outdoor private amenity space is integral to the scheme. All residential units in both the private and affordable sectors have generous balconies providing private external space except for four studio apartments which benefit from Juliet balconies. The balconies are either double aspect corner balconies, inset balconies, projecting elements or a combination of all three and are designed to maximise views to the south of the site and along the canal where possible. Of the 11 Studio apartments in the scheme seven have full sized balconies and four have Juliet balconies. The Juliet balconies include large full height sliding doors to maximise openness and a relationship with the external environment.

## Design

## Overarching Design

6.69 Paragraph 56 of the NPPF states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development; is indivisible from good planning; and should contribute positively to making places better for people. Paragraph 58 of the NPPF outlines that planning policies and decisions should aim to ensure that developments:



- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- Are visually attractive as a result of good architecture and appropriate landscaping.
- 6.70 Good design is central to all objectives of the London Plan. Policies contained within Chapter 7 set out a series of overarching design principles for development to achieve by addressing its layout, height and massing and elevations.
- London Plan Policy 7.4 states that "Buildings, streets and open spaces should provide a high quality design response that: a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale proportion and mass, b) contributes to a positive relationship between the urban structure and natural landscape features, c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings, d) allows existing buildings and structures that make a positive contribution to the character of the place to influence the future character of the area, and e) is informed by the surrounding historic environment".



- 6.72 Policy 7.6 states that "Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.' In respect of design and appearance Policy 7.6 also requires new buildings and structures to be 'of the highest architectural quality; they should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm and they should include details and materials that 'complement, not necessarily replicate' local architectural character.
- 6.73 Local Plan Policy D1 sets out that LBC will seek to secure high quality design in development and will require that development:
  - Respects local context and character;
  - Preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage";
  - Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
  - Is of sustainable and durable construction and adaptable to different activities and land uses;
  - Comprises details and materials that are of high quality and complement the local character;
  - Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
  - Is inclusive and accessible for all;
  - Promotes health;
  - Is secure and designed to minimise crime and antisocial behaviour;
  - Responds to natural features and preserves gardens and other open space;



- Incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- Incorporates outdoor amenity space;
- Preserves strategic and local views;
- For housing, provides a high standard of accommodation; and
- Carefully integrates building services equipment.
- 6.74 Policy D1 emphasises that LBC will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 6.75 CPG 1 (Design) sets out further detailed guidance in respect of LBC design requirements for new developments.
- The aforementioned design related policies and guidance have been carefully considered by the scheme architects, Bennetts Associates. The accompanying Design and Access Statement prepared by Bennetts Associates provides an analysis of the constraints and opportunities presented by the development. It sets out the design objectives, design principles and building design principles which have informed the proposed development. It explains how the proposals contributes positively to the context of the site and surroundings, how the proposals contribute positively to the streetscape and how the proposed development responds to, and accords with, the design related planning policies and guidance.
- 6.77 In summary, it is considered that the proposal provides a scheme of the highest architectural quality, in terms of appearance, layout and massing and will contribute positively to the townscape of the surrounding area. The design of the building has been influenced through detailed consideration of the surrounding

local context and through discussions with both LBC and GLA Design Officers and feedback from two DRPs. The development thereby accords with policies contained within the NPPF, London Plan Policies 7.4and 7.6, Local Plan Policy D1 and CPG 1 (Design).

# Designing Out Crime

- 6.78 London Plan Policy 7.3 sets out that London Boroughs and others should seek to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion.
- 6.79 Local Plan Policy C5 sets out that LBC will aim to make Camden a safer place and will require developments to demonstrate that they have incorporated design principles which contribute to safety and security.
- 6.80 CPG 1 (Design) sets out that the proposed development, in the context of crime and safety, should be considered and security features should be considered early in the design process.
- 6.81 The accompanying Design and Access Statement, prepared by Bennetts Associates, sets out that the proposed development has been designed in consultation with the 'Designing Out Crime Officer' of the Metropolitan Police. The following design features, inter alia, have been incorporated within the design accordingly:
  - Destination controlled lifts;
  - Card and / or fob access control;
  - CCTV cameras;
  - 24-hour concierge;
  - Active frontages to public realm;

- Street lighting; and
- Residential apartments in building C1 will comply with the requirements of Approved Document Part Q (2015) and secured by design.
- As such, the proposed development is in accordance with London Plan Policy 7.3, Local Plan Policy C5 and CPG 1 in respect of designing out crime.

Access

- 6.83 London Plan Policy 7.2 sets out that the Mayor will require all development in London to achieve the highest standards of accessible and inclusive design.
- 6.84 Local Plan Policy C6 sets out that LBC will week to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities and CPG 6 (Amenity) sets out that LBC will seek to ensure the highest standards of access and inclusion in Camden's built environment and public realm.
- The accompanying Design and Access Statement, prepared by Bennetts Associates, sets out the numerous measures to ensure the development is accessible and inclusive. The Site is proposed to be open, fully accessible and without barriers, whilst the buildings have been designed to be flexible including adaptable and accessible homes. As such the proposed development is in accordance with London Plan Policy 7.2, Local Plan Policy C6 and CPG 6 in respect of access and inclusive design.

## Townscape and Visual Assessment

6.86 All design policies set out in the 'Overarching Design' section of this Planning Statement are of relevance in respect of the townscape and visual impacts associated with the proposed development. To assess the proposed development



against the relevant planning policies and guidance documents, a Townscape Heritage and Visual Impact Assessment ("THVIA") has been prepared by Tavernor Consultancy and accompanies the planning application submission. The THVIA includes a Townscape and Visual Assessment in the context of the aforementioned planning policy framework.

- 6.87 Representative townscape views for assessment were selected in consultation with LBC through pre-application discussions. 13 verified views have been included for assessment and are a selection of designated LVMF views and representative local townscape views from publicly-accessible locations around the Site.
- 6.88 The THVIA concludes that the likely effects of the high quality Proposed Development on two designated LVMF SPG views and 11 representative townscape views would range from negligible to major, beneficial.

## Built Heritage Assessment

- 6.89 The THVIA also includes a Built Heritage Assessment which provides an assessment of the likely significant effects of the Proposed Development on the character and appearance of the Regent's Canal Conservation Area, within which the Proposed Development is located. The assessment also considers the likely effects on the settings of individual above ground heritage assets in the vicinity of the Site.
- 6.90 In assessing the heritage impacts of the proposed development, the THVIA has regard to, inter alia, the following planning policies:
  - NPPF Paragraph 134 states that where a proposed development will lead to harm or loss, to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal;



- London Plan Policy 7.8 sets out that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail;
- Local Plan Policy D1 sets out that LBC require development to preserve or enhance the historic environment and heritage assets;
- Local Plan Policy D2 sets out that LBC will preserve and enhance Camden's
  heritage assets and will not permit the loss of or harm to a designated heritage
  asset including conservation areas unless it can be demonstrated that the harm
  or loss is necessary to achieve substantial public benefits that outweigh the
  harm or loss;
- CPG 1 (Design) states that LBC will only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- The THVIA identifies that the existing building is a 'negative contributor' to the Regent's Canal Conservation area. The GLA, in their pre-application correspondence state that "as its name suggests the existing building does not have positive townscape impact". The demolition of the existing building and redevelopment of the Site would have no harm to the designated conservation area and, therefore, Para 134 of the NPPF is not engaged.
- 6.92 The THVIA concludes that the character and appearance of the Regent's Canal Conservation area would, in fact, be enhanced by the high quality proposed development. The proposed development would also preserve the character and appearance of the setting of the King's Cross Conservation Area and would not harm the heritage significance of the listed structures, the listed landscape of St Pancras Gardens or non-designated positive contributors to the Regent's Canal Conservation Area included in the assessment. As such the proposed development is in accordance with the NPPF, the London Plan Local Plan Policies D1 and D2 and

CPG 1 in respect of the impact of the impact of the proposed development on designated and non-designated heritage assets.

### **Public Realm**

- 6.93 London Plan Policy 7.5 states that London's public spaces should incorporate the highest quality design, landscaping, planting, street furniture and surfaces.
- 6.94 CPG 1 (Design) highlights the importance of the design of public spaces and the materials used. The guidance states that the size, layout and materials used in the spaces around buildings will influence how people use them, and help to create spaces that are welcoming, attractive, accessible and safe and useful.
- 6.95 A Landscape Strategy has been prepared by Fabrik and accompanies the planning application submission and sets out that the proposed public realm comprises several key character areas as follows:
  - Central Plaza;
  - Retail Street;
  - Canal Frontage;
  - Front Garden;
  - North Street;
  - Street Frontage.
- 6.96 Details of the character areas are explained in detail in the accompanying Fabrik Strategy.
- 6.97 Throughout the public realm and across the various character areas soft landscaping and high quality hard landscaping materials are proposed. In respect





of soft landscaping, the proposed trees have been selected with regard to the specific site context and will contribution to both biodiversity and place making.

6.98 In respect of smaller plants, shrubs and grasses, the indicative planting palette proposed by Fabrik reflects the environmental conditions expected in the planting locations, whilst also complementing the aesthetic of the hard landscape materials and architectural palette.

As such the proposed development is in accordance with London Plan Policy 7.5 and CPG 1 in respect of the inclusion, quantum and design of a high quality public realm central to the proposed development.

## Transport

## Transport Assessment

- 6.100 The NPPF requires new developments to consider local transport capacity and promote sustainable transport choices (Para 32). The London Plan promotes development that will not adversely affect safety on the transport network.
- 6.101 Local Plan Policy A1 sets out that LBC will seek to protect the quality of life of occupiers and neighbours and will consider transport impacts of developments.
- 6.102 A Transport Assessment which models and assesses trip rates for all elements of the proposed development has been prepared by Caneparo Associates and accompanies the planning application submission.
- 6.103 The Transport Assessment concludes that whilst there will be an increase in trips associated with the development most these trips will be undertaken by sustainable modes such as public transport and the proposed development will



generate very few private vehicle trips. The predicted trip generation is reflective of the sustainable location of the Site and in accordance with the NPPF, the London Plan and Local Plan Policy A1 in respect of sustainable travel.

Walking & Cycle Parking

- 6.104 Local Plan Policy T1 sets out that LBC will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 6.105 To promote walking in the borough the LBC will seek to ensure that developments:
  - Improve the pedestrian environment by supporting high quality public realm improvement works;
  - Make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;
  - Are easy and safe to walk through ('permeable');
  - Are adequately lit;
  - Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and
  - Contribute towards bridges and water crossings where appropriate.
- 6.106 The proposed development provides a high quality public realm that is wholly accessible to pedestrians by contrast to the existing arrangement at the Site, which is entirely impermeable. The proposed development comprises logical and inviting pedestrian routes that provide a safe and well-designed environment in accordance with Local Plan Policy T1.





6.107 Local Plan Policy T1 sets out that LBC will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan. Those standards relevant to the proposed development are set out in Table 9 on the following page:

**Table 9 – Cycle Parking Requirements** 

Use Class	Long Stay	Short Stay		
A1 Food retail	From a threshold of 100sqm: 1 space per 175sqm	From a threshold of 100sqm: first 750sqm: 1 space per 40sqm thereafter: 1 space per 300sqm		
A1 Non-food retail	From a threshold of 100sqm: first 1000sqm: 1 space per 250sqm thereafter: 1 space per 1000sqm	From a threshold of 100sqm: first 1000sqm: 1 space per 125sqm thereafter: 1 space per 1000sqm		
A2 –A5 Financial / professional services / cafes / restaurants / drinking establishments / takeaways	From a threshold of 100sqm: 1 space per 175sqm	From a threshold of 100sqm: 1 space per 40sqm		
B1 Business offices	1 space per 90sqm.	First 5,000sqm: 1 space per 500sqm. Thereafter: 1 space per 5,000sqm.		
C1 Hotel	1 space per 20 bedrooms	1 space per 50 bedrooms		
C3 Residential	1 space per studio and 1 bedroom unit 2 spaces per all other dwellings	1 space per 40 units		
D2 Sports	1 space per 8 staff	1 space per 100sqm		

6.108 Long-stay cycle parking will be provided for all elements of the proposed development in accordance with the London Plan minimum standards. Long-stay cycle parking provision (set alongside policy requirements for ease) for the proposed development, are set out in Table 10 on the following page:



Table 10 - Long-Stay Cycle Parking Provision

Land Use	Min. Standard	Min. Requirement	Plot A	Plot B	Plot C	All Plots
Business	1 per 90sqm (GEA)	636	117	157	380	654
Retail	From 100sqm – 1 per 175sqm (GEA)	35	6	-	39	45
Gym	1 per 8 staff	2	-	-	2	2
Residential	1 per 1 bed unit; 2 per 2+ bed unit	102	-	-	102	102
Hotel	1 per 20 bedrooms	5	-	5	-	5
Total	-	780	123	162	523	808

- 6.109 In addition to the above long-stay cycle parking spaces, 104 short-stay cycle parking spaces will be provided in the form of Sheffield Stands spread throughout the public realm. Although this is below the London Plan's minimum standards for short-stay parking, it is considered that it will be sufficient to meet the cycle parking demand. This is on the basis that the development is mixed use, and therefore the demand for cycle parking will vary depending on the land use and time of day.
- 6.110 As such, the proposed development is considered to be wholly acceptable and in accordance with the NPPF, the London Plan and Local Plan Policy T1 in respect of cycle parking provision.

# Car Parking

6.111 Local Plan Policy T2 sets out that the Council will limit the availability of parking and require all new developments in the borough to be car-free (with the exception of spaces designated for disabled people where necessary and / or parking spaces required for essential operational or servicing needs). Supporting Para. 10.20 states that "In redevelopment schemes, the Council will consider retaining or reproviding existing parking provision where it can be demonstrated



that the existing occupiers are to return to the address when the development is completed".

- 6.112 The Transport Assessment accompanying the planning application submission sets out that there are approximately 52 car parking spaces within the existing site, comprising 6 spaces at surface level accessed from St Pancras Way, 44 spaces at the ground floor of what is known as Plot B and 2 internally within Plot C. All existing spaces are currently used by Ted Baker.
- 6.113 The proposed development seeks to retain a basement car park which will continue to be used by Ted Baker, albeit with a reduction of 22 spaces from 52 to 30. The provision of parking at a reduced level for a retained occupier is considered acceptable and has been agreed in principle with LBC highways officers during pre-application discussions. The proposed approach is wholly consistent with Para 10.20 of the Local Plan which is set out above.
- 6.114 The proposed development also provides disabled parking for Blue Badge holders across the Site with 3 spaces in the basement car part at Plot B (10% of the total number of spaces) and 2 spaces at Plot C accessed from Granary Street. The 2 spaces at Plot C meet LBC's requirement for 10% of the affordable units to be provided with disabled parking spaces. This level of provision was discussed and agreed with LBC highways officers during pre-application discussions and is in accordance with the requirements of Local Plan Policy T2.

# Delivery / Servicing

6.115 Local Plan Para. 6.9 states that "To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever possible".



- 6.116 The Transport Assessment accompanying the planning application submission sets out that servicing of the development will be undertaken both on-site and on-street.
- 6.117 Plot A will be serviced from a proposed footway loading bay on St Pancras Way.

  The loading bay is situated on the frontage to the building and can accommodate large rigid goods vehicles, although use of such vehicles is expected to be infrequent.
- 6.118 For Plot B, servicing will be undertaken primarily from loading bays within the basement which is accessed from St Pancras Way. A swept path analysis showing a transit van accessing and egressing the servicing area is included at Appendix I. Larger vehicles will be able to make use of the footway loading bay on St Pancras Way.
- 6.119 Servicing for Plot C will be undertaken from the on-site service yard at the south of the building, accessed from Granary Street. The service yard can accommodate multiple vehicles simultaneously, including large goods vehicles. Swept path analyses of the service yard, including an 8m 7.5t box van, are included at Appendix I.
- 6.120 The proposed servicing strategy has been discussed, and agreed in principle, with LBC highways officers during pre-application discussions. The carefully considered proposed strategy is considered to avoid congestion and protect residential amenity in accordance with the requirements of the Local Plan.
- 6.121 Local Plan Policy E3 states that provide any necessary pickup and set down points for private hire cars and coaches and provide taxi ranks and coach parking where necessary.





## **Sustainability & Energy**

- 6.122 Paragraph 96 of the NPPF states that local authorities should expect new development to comply with adopted Local Plan policies on requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable. The NPPF also outlines that new development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.123 The London Plan climate change policies set out in Chapter 5 collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions.
- 6.124 London Plan Policy 5.2 sets out an energy hierarchy (Be lean, Be clean, Be green) within which development proposals should seek to minimise carbon dioxide emissions. The Policy also sets a target for zero carbon residential buildings from 2016.
- 6.125 London Plan Policy 5.7 seeks to increase the proportion of energy generated from renewable sources, with major development proposals expected to provide a reduction in expected carbon dioxide emissions using on-site renewable energy generation.
- 6.126 Local Plan Policy CC1 sets out that LBC will require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable. LBC will require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met.



- 6.127 Local Plan Policy CC2 sets out a non-domestic development of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019.
- An Energy and Sustainability Statement and a BREEAM Stage 2 Pre-Assessment 6.128 have both been prepared by Max Fordham and accompany the planning application submission. The Statement reports the sustainability requirements for the Plots A, B and C and assesses the proposed development against the requirements of the Building Regulations, the London Plan and the Camden Local Plan. The Statement concludes that the proposed development surpasses a 35% reduction in carbon emissions of Part L, as required by the London Plan. This is due to the use of the enhanced building fabric, efficient mechanical and electrical systems and the use of district heating through all buildings on site. The proposed development also utilises all available roof area for photovoltaic panels to maximise renewable energy generation. Furthermore, a BREEAM Stage 2 Pre-Assessment has been undertaken and the project is on target to achieve an 'Excellent' rating. As such, the proposed development is in accordance with the NPPF, the London Plan and Local Plan Policies CC1 and CC2 in in respect of energy and sustainability.

### **Amenity**

Local Plan Policy A1 sets out that LBC will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity. The factors that LBC will consider are set out below.



Visual Privacy, Outlook

- 6.129 Local Plan Policy A1 sets out that in seeking to protect the quality of life of occupiers and neighbours, LBC will consider visual privacy and outlook in the design of developments.
- 6.130 As set out in the accompanying Design and Access Statement, the proposed development has been designed to accommodate buildings of different uses, aspects and massing. The disposition of the blocks creates a series of spaces with a legible hierarchy of streets, canal edge and squares. These spaces will have distinct characteristics, some will be lively and public and some will be more private. Bennetts Associates have sought to locate the residential units towards the more private part of the site and away from the key public space. The apartments have been designed to take advantage of the views to the south and along the canal and as such the majority of the apartments look out from the sites edge and do not present overlooking issues. The apartments to the west façade of block C1 look into the street space between C1 and C2, to minimise the potential of overlooking the following steps have been taken:
  - Residential façade angled away from block C2 to create oblique non-parallel walls, this opens up views to the south, promotes light penetration and limits direct overlooking;
  - Western face of workplace block C2 angled away from the residential block C1, as above this opens up views to the south, promotes light penetration and limits direct overlooking; and
  - Office façade screened with vertical fins to prevent overlooking at the narrowest point of the street.





Sunlight, Daylight and Overshadowing

6.131 London Plan Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings.

- 6.132 Local Plan Para 6.5 sets out that to assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will consider the most recent guidance published by the Building Research Establishment.
- 6.133 A Daylight and Sunlight Report has been prepared by Waldrams and accompanies the planning application submission. In accordance with the BRE Guidelines, Waldrams have analysed the effect of the proposed development on the daylight and sunlight to the surrounding properties, the daylight and sunlight available to residential space within the proposed development and the sunlight amenity to internal spaces within the proposed development. Sunlight available to Regent's Canal adjacent to the proposed development has also been analysed.
- 6.134 The technical analysis is set out in detail in the accompanying report, however, the broad conclusions are summarised below:
  - The two amenity spaces within the proposed development receive at least 2
    hours of sunlight to 98% and 55% of their respective areas on March 21st, and
    will both meet the BRE Guidelines for Sunlight Amenity;
  - The length of Regent's Canal adjacent the proposed development receives at least 2 hours of sunlight to 80% of its area on 21st March and therefore continues to meet the BRE Guidelines for an amenity space;
  - In respect of the residential accommodation within the proposed development 80% of habitable rooms meet the BRE Guidelines for internal daylight and 23 of the 36 main living rooms that face within 90 degrees of due south meet the





BRE Guidelines for both Annual and Winter APSH (Sunlight). The results represent a reasonably good level of daylight overall for a development in an urban environment such as this;

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All surrounding residential and student accommodation meets the BRE
Guidelines for Daylight when the alternative baseline condition (based on a
'mirror-image' analysis) is used. Sunlight to surrounding properties either
meets or is sufficiently close to the BRE Guidelines with the proposed
development in place.

6.135 Given the above conclusions, it is considered that the proposed development is in accordance with London Plan Policy 7.6 the Local Plan in respect of daylight and sunlight.

Noise

6.136 The London Plan Policy 7.15 states that development should seek a reduction in noise levels by minimising existing and potential adverse impacts of noise, separating new noise sensitive development from major noise sources and by promoting new technologies and improved practices to reduce noise at the source.

Local Plan Policy A4 sets out that the Council will seek to ensure that noise and vibration is controlled and managed and LBC will not grant planning permission for developments likely to generate unacceptable noise and vibration impacts or development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided.

CPG 6 (Amenity) sets out that LBC will ensure that noise and vibration is controlled and managed to:



- Limit the impact of existing noise and vibration sources on new development;
   and
- Limit noise and vibration emissions from new development.
- 6.137 A Noise Assessment has been prepared by Waterman and accompanies the planning application submission.
- 6.138 The Noise Assessment concludes that noise levels can be satisfactorily controlled to within recommended acoustic design standards so that a high quality acoustic environment is provided to all future occupants and that impacts associated with the operation of the completed development can be controlled to a level of negligible significance for existing receptors. As such the proposed development is in accordance with London Plan Policy 7.15, Local Plan Policy A4 and CPG 6 in respect of noise.

## Air Quality

- 6.139 Local Plan Policy CC4 sets out that LBC will ensure the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.
- 6.140 CPG 6 (Amenity) sets out that all developments are to limit their impact on local air quality.
- 6.141 An Air Quality Assessment has been prepared by Waterman and accompanies the planning application submission.
- 6.142 The Air Quality Assessment concludes that with the implementation of a range of appropriate management practices to control dust, plant and vehicle emissions, the overall effect of the proposed development on air quality is insignificant. As



such the proposed development is in accordance with Local Plan Policy CC4 and CPG 6 in respect of air quality.

## **Nature Conservation and Biodiversity**

- 6.143 Policy A3 sets out that LBC will grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species.
- 6.144 Policy A3 also sets out that LBC will seek to realise benefits for biodiversity through the design of developments and their proposed landscaping elements.
- 6.145 Local Plan Policy CC2 sets out that all developments should incorporate bio-diverse roofs.
- An Ecological Appraisal has been prepared by Aspect Ecology and accompanies the planning application submission. The appraisal sets out that the Site was surveyed in June 2016 to ascertain the general ecological value of the land contained within the boundaries of the Site and to identify the main habitats and ecological features present. The Ecological Appraisal concludes that the vast majority of the Site is dominated by the existing building, with the remaining areas occupied largely by hardstanding, whilst the interface with the adjacent canal corridor is similarly comprised of hardstanding. Vegetation within the Site is limited to small isolated areas of amenity planting and grassland, a small number of young standard trees and sparse colonising weeds, which are extremely unlikely to provide any significant ecological value even.
- 6.147 Subject to the implementation of proposed measures and safeguards, as set out in the Ecological Appraisal, it is considered unlikely that the Proposed Development would result in significant harm to sensitive ecological receptors. Furthermore,



ecological enhancements are proposed in the form of new planting, biodiverse roofs and bird / bat boxes as part of the proposed development:

6.148 As such the proposed development is in accordance with Local Plan Policy A3 in respect of nature conservation and biodiversity.

# **Trees and Vegetation**

- 6.149 Local Plan Policy A3 seta out that LBC will seek to protect and secure additional tees and vegetation and will expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development.
- 6.150 An Arboricultural Impact Assessment, prepared by Aspect Arboriculture, and a Landscape Strategy, prepared by Fabrik, accompany the planning application submission.
- 6.151 The Arboricultural Impact Assessment evaluates the existing trees within the Site and identifies that there are 30 trees within the influence of the application area There is only one high quality (category A) tree on Site (a Silver Maple located on the Site's frontage with St Pancras Way). There are 11 moderate quality (category B) trees within influence of the application area divided into 2 cohorts as follows:
  - Norway Maple 'Crimson King' located on the Site's frontage with St. Pancras
     Way; and
  - Variegated Sycamore forming a parcel of ornamental plantings adjacent to the Site's eastern boundary with Regent's Canal.





- 6.152 To facilitate the proposed development, and in the absence of an alternative design response that allows for their sustainable integration, the above referenced high and moderate quality trees must be removed. Aspect Arboriculture, set out that the loss of the existing trees should be mitigated with replacement plantings, as part of a comprehensive scheme of soft landscaping and that the replacement plantings should be both appropriate for inclusion within the proposed setting, and, once established, provide betterment to the amenity of the street and conservation area.
- 6.153 The accompanying Arboricultural Assessment concludes that the proposed landscaping strategy is capable of mitigating for the necessary removal of the existing trees in accordance with Local Plan Policy A3.

## **Health and Wellbeing**

- 6.154 Local Plan Policy C1 sets out that LBC will promote healthy communities with measures to help contribute to healthier communities to be incorporated in a development where appropriate. Local Plan Policy C1 requires proposals for major development proposals to include a Health Impact Assessment (HIA).
- 6.155 In accordance with the requirements of Policy C1, a Health Impact Assessment has been prepared by Regeneris Consulting and accompanies the planning application submission. The assessment concludes that no significant health impacts resulting from the development have been identified and that the proposed development will have a neutral or positive impact across all 11 categories set by the Healthy Urban Development Unit ("HUDU"). The Health Impact Assessment has also identified several positive health impacts that can be broadly summarised as follows:
  - Improved access to open space and nature;

- Improved accessibility and travel; and
- Access to work and training.

### **Basements**

- 6.156 Local Plan Policy A5 sets out that LBC will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
  - Neighbouring properties;
  - The structural, ground, or water conditions of the area;
  - The character and amenity of the area;
  - The architectural character of the building; and
  - The significance of heritage assets.
- 6.157 Policy A5 states that, in determining proposals for basements and other underground development, the Council will require an assessment of the development proposal's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment.
- The proposed development comprises a part one and part two- storey basement. The planning application is, in accordance with Policy A5, accompanied by a Basement Impact Assessment, prepared by GD Partnership Ltd. The Impact Assessment considers the relationship of the proposed basement with neighbouring properties, structural stability and impact on drainage, flooding and groundwater conditions.
- 6.159 The proposed basement is part of a comprehensively planned site. The basement is a fundamental requirement of the proposed development and it has been demonstrated in the accompanying Basement Impact Assessment, and other





supporting documentation, that the construction of it will not harm neighbouring properties or structural, ground or water conditions of the area. As such the proposed development is in accordance with Local Plan Policy A5 in respect of the proposed basement.

## 7.0 REGERATION BENEFITS

- 7.1 A Regeneration Statement, prepared by Regeneris Consulting, accompanies the planning application submission.
- 7.2 The Regeneration Statement sets out the benefits of the development and demonstrates how it will provide a catalyst for the wider regeneration of the area.
- 7.3 The broad benefits of the development, as set out in detail by Regeneris Consulting, are summarised below:
  - Delivery of residential accommodation including an element of affordable housing;
  - New commercial floorspace including flexible retail, business and leisure floorspace;
  - A new headquarters for Ted Baker which will allow them to remain, and grow, in the London Borough of Camden;
  - Creation of circa 400 construction workers per year over a 6-year construction period;
  - Up to 4,030 FTE gross jobs supported on Site following completion. With an estimated 630 FTE jobs provided currently and any multiplier effects it is estimated there would be 3,740 gross additional jobs on Site;
  - Additional GVA of around £215m generated by the Proposed Development once fully operational;
  - It is estimated that total expenditure16 generated from the Proposed Development would equate to c. £0.6 million per annum in the St. Pancras and Somers Town ward and £0.8 million per annum within the Borough;
  - Provision of open space and playspace and enhancements to the public realm;
     and
  - Unlocking of the currently inaccessible canal side.



## 8.0 COMMUNITY INFRASTRUCTURE AND DRAFT HEADS OF TERMS

Community Infrastructure Levy ("CIL")

- 8.1 The setting of a London-wide CIL is a power given to the Mayor under the Planning Act 2008 designed to raise money for the infrastructure needed to develop an area. The Mayor formally adopted his CIL charging schedule on 1 April 2012, following an Examination in Public in November 2011. The Mayoral CIL is now, therefore, payable on most new developments.
- 8.2 For development proposals in the London Borough of Camden, the Mayoral CIL will be levied at £50 per m² of uplift from existing to consented floorspace in lawful use. The money raised will go towards London's share of the Crossrail funding package agreed with the Government.
- 8.3 LBC adopted their borough CIL charging schedule on April 1, 2015. CIL is levied at variable rates across the borough and is also dependent on the nature of the proposed uses(s). Borough CIL funds will pay for a wide range of infrastructure, which could include parks, schools, community facilities, health facilities and leisure centres, for example.

Planning Obligations for the Development

- 8.4 CPG 8 Planning Obligations (2015) has been considered as part of this application and will be used in considering financial contributions to LBC. Further discussions are to be held with LBC Officers during the determination of the planning application to agree the contributions to be made.
- 8.5 A draft set of the Heads of Terms are provided without prejudice below:



## THE UGLY BROWN BUILDING

- Provision of on-site affordable housing; and
- Employment and Training contributions.
- 8.6 It is envisaged that all S106 obligations, CIL payments and planning conditions will reflect the fact that the proposed development is intended to be constructed, and occupied, in a series of phases.

## 9.0 CONCLUSIONS

9.1 This Planning Statement has been prepared to accompany an application for planning permission at '2-6 St Pancras Way, London, NW1 0TB' for the following proposed development:

"Demolition of the existing building and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use business floorspace (B1), residential (C3), hotel (C1), gym (D2), flexible retail (A1-A4) and storage space (B8) development with associated landscaping work".

- 9.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals for development to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 9.3 This Planning Statement has assessed the proposed development against the provisions of the Development Plan, Supplementary Planning Guidance and National Planning Policy. It is considered that overall, the proposed development accords in all material respects with the relevant policies and delivers significant benefits by providing, inter alia:
  - Delivery of residential accommodation including an element of affordable housing;
  - New commercial floorspace including flexible retail, business and leisure floorspace;
  - A new headquarters for Ted Baker which will allow them to remain, and grow, in the London Borough of Camden;
  - Creation of circa 400 construction workers and circa 4,000 jobs following completion;



- Additional GVA of around £215m generated by the Proposed Development once fully operational;
- Provision of open space and playspace and enhancements to the public realm;
   and
- Unlocking of the currently inaccessible canal side.
- 9.4 The likely impacts of the development have been fully assessed by supporting technical documents which demonstrate that the development is wholly acceptable in all regards.
- 9.5 The Development has been progressed through extensive discussions with stakeholders and responds to comments received, including those from LBC.
- 9.6 For all the reasons set out in this Statement it is considered that the development accords with the Development Plan and that permission should be granted without delay.