



29th November 2017

Jennifer Walsh
Camden Borough Council
2nd Floor
5 Pancras Square
C/o Town Hall
Judd Street
London
WC1H 9JE

Our Ref CRTR-PLAN-2017-23651
Your Ref 2017/5497/P

Dear Ms Walsh,

Proposal: Demolition of the existing building (Class B1 and B8) 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.

Location: 2-6, St Pancras Way, London

Waterway: Regent's Canal

Thank you for your consultation.

The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives". We are a statutory consultee in the development management process.

The Trust has reviewed the application. This is our substantive response under the Town and Country Planning (Development Management Procedure) (England) Order 2015.

The main issues relevant to the Trust as statutory consultee on this application are:

- a) Impact on the character and appearance of the waterway corridor.
- b) Impact on the structural integrity of the canal due to the proximity of the building to the Regent's Canal.
- c) Impact on the water quality of the Regent's Canal due to the drainage proposals.
- d) Impact on the biodiversity of the Regent's Canal.

On the basis of on the information available our advice is that suitably worded **conditions and a legal agreement are necessary** to address some of these matters. Our advice and comments are detailed below:

- a) Impact on the character and appearance of the waterway corridor

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Design

We support the positioning of commercial uses along most of the ground floor facing the canal, creating a vibrant and interesting frontage. However, the close proximity of the buildings to the water's edge counters this to some degree, and we consider that the design would benefit from some opening out to create a meaningful waterside plaza. The hard edge to the rear of the towing path, with quite a tall brick wall and increasingly tall development toward Camley Street, could create a feeling of canyoning, with the buildings having a uniform frontage along the canal, and some considerable height, (best illustrated in the CGI on page 85 of the Design and Access Statement). There is a generous public space in the centre of the development, and we would query if this 'wedge' could be rotated, so that the main thoroughfare through the site widens out onto the canalside, with a meaningful and generous waterside 'destination'.

If Block B could also be stepped further back it would improve the waterside space, and appear less overbearing.

The existing building occupying the entire site is only a maximum of 4 storeys in height, so the increase to 12, 9 and 7 is quite pronounced, and adds to the possible sense of overcrowding of the canal. The stepping back of the top 2 stories of the low element of Block C1 and the top floor of Block A helps to some extent, but the mass of Block B seems very large, especially as this visually increases above third floor. It would be improved if the mass of this building could be decreased somehow, by stepping back the top storey(s), cutting away the corner into the public thoroughfare, or reducing the overall height of the block.

The random positioning of the cladding on Block B appears a bit fussy. While we admire the desire to seek something bold and interesting at this location, we are not convinced by the execution in this instance, and would like to see further details.

We are also concerned about the extent of showers and bike storage along the ground floor canal frontage of Block B, which would likely present a largely blank facade. If the hotel bar or other 'open' uses could be placed along this elevation it would be an improvement to the vibrancy of the canalside.

The mix of internal and external balconies on the tall residential element of Building C1 helps to animate the façade and it would be enhanced if this were carried through to the lower element too, although it is recognised that this is commercial, not residential.

- b) Impact on the structural integrity of the canal due to the proximity of the building to the canal



Waterway Wall

The proposed works will need to comply with the Code of Practice for Works Affecting the Canal & River Trust, and we have requested an informative regarding this, below. A survey of the canal wall will be required to inform potential mitigation measures to carry out demolition and piling work safely, and we have therefore suggested a condition regarding this be attached, below. The contractor should develop a works sequence to ensure demolition of the existing structure does not destabilise the canal, which we will need to review before works. New piling works are proposed close to the canal so a displacement and vibration monitoring regime will need to be in place for the work.

- c) Impact on the water quality of the Regent's Canal due to the drainage proposals

Surface Water Drainage from Roof Structures

Due to the topography of the site, only rainwater from the roofs will be discharged to the canal. All roofs will consist of paved-over blue roofs or combination biodiverse/blue roofs. We consider that the applicant should commit to a design and maintenance regime for the biodiverse roofs that will ensure only low nutrient runoff will be discharged to the canal (e.g. low organic content in substrate and minimal fertiliser application). We have therefore suggested that this should be part of the landscaping condition we have requested, below.

There are no existing surface water outfalls to the canal to consider during the construction phase and it is stated in the Construction Management Plan that any contaminated groundwater encountered will be treated and sent to the foul sewer. If there was any request to discharge extracted groundwater from the construction phase to the canal, we would require water quality data to ensure this was acceptable.

The applicant should be aware that any discharge of surface water drainage into the Regent's Canal will be subject to an agreement with the Canal & River Trust's Utilities team, and I have requested this be added to any permission as an informative, below.

- d) Impact on the biodiversity of the waterway corridor, and adjacent moorings, from overshadowing, and impact on biodiversity from site lighting

Overshadowing – Impact on Moorings and Ecology

The Daylight and Sunlight report advises at Page 4 that the “Regent's Canal adjacent the proposed development receives at least 2hrs of sunlight to 80% of its area on 21st March and therefore continues to meet the BRE Guidelines for an amenity space”. However, we do not consider that this is reasonable or appropriately considered. There is a stretch of visitor moorings along the towpath opposite the site, where boats, many in residential use, may moor for up to 14 days at a time, and these are in constant use. These should be treated as

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residential properties for the purposes of the site assessment, therefore. Boats often rely on solar panels to help provide electricity for heating and other needs, and if the moorings are overshadowed so that the solar panels do not work, then boats are likely to be reliant on generating power from their engines, which can lead to additional noise and smells. This can lead to complaints from surrounding properties. We would like the applicant to consider this potential impact on the moorings, and the application site's future residents, further. Elsewhere on the Regent's Canal, in Islington, we are trialling the use of electricity bollards for visitor moorings, and this could be an option for consideration here, which could form part of a S106 agreement to help mitigate the impact of the development.

The Regent's Canal is a site of metropolitan importance for nature conservation, and the Local Plan recognises that there is considerable scope to improve biodiversity along the canal. To help mitigate the expected overshadowing from the development, we would expect enhancements to its ecology, in line with Policy A3 of the Local Plan. Subject to future potential for moorings along the offside (non-towpath side) there may be opportunities for marginal aquatic planting through floating reed beds or coir rolls, subject to agreement of the Trust, suitable ongoing maintenance, and no impact on navigation. The site may also benefit from environmental enhancements such as bird and bat boxes.

Lighting

There does not appear to be a lighting plan for the proposed development, and I have therefore suggested a condition, below. No lighting should be installed which directly illuminates the surface of the canal, in order to protect this site of metropolitan importance for nature conservation, and its role as a bat feeding corridor.

Energy

The development could make use of the canal water for heating and cooling of the development, and the Trust's Water Development Team would be happy to consider this further with them, which may prove to be more environmentally and economically efficient than other methods.

Off site works

The development will bring more people to the area, who will want to make use of the waterspace and the canal environment, including the towpath for walking and cycling around the area. The stretch adjacent to the site is very heavily used, with significant numbers of cyclists and pedestrians, particularly in the morning peak period. To introduce more local visitors and residents will exacerbate this, and we would therefore be looking for a contribution from the development towards the improving the canal environment for all users. We are currently working with the Camden Town Unlimited BID on plans to improve the stretch of towpath between Camden and King's Cross, and a contribution towards these proposals

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would therefore be appropriate, which in this area include currently includes greening and signage. We are waiting to hear back very soon on the proposed costings, and will then be in a position to propose a figure that would be fairly and reasonably related for a development of this scale.

We understand that consideration is being given by the Council to a new footbridge over the canal at the south eastern end of the site. The Trust has previously expressed its view that we do not consider this appropriate, due to the cumulative adverse impact of another bridge in this already overshadowed stretch of towpath to King's Cross, and would prefer to see an alternative location considered, as well as improvements to the existing Camley Street road bridge and the towpath, to assist pedestrian and cyclist movement in the area.

If the Council is minded to grant planning permission, we request to be involved in the S106 agreement for the towpath works. We would also ask that the following conditions and informatives be attached to the decision notice:

Conditions

“Prior to the commencement of the development hereby permitted, full details of the proposed landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme should include reference to plant species types, surface treatments, fences and walls, any signage and information boards together with the means of on-going maintenance, which must include a design and maintenance regime for the biodiverse roofs that will ensure only low nutrient runoff will be discharged to the Regent’s Canal. The approved landscaping scheme shall be implemented by the first planting scheme after the final phase of the development commences. Reason: To ensure the character of the Regent’s Canal is retained, and to enhance it as a green corridor, in accordance with Policies A2 and A3 of the Camden Local Plan 2017, and the Blue Ribbon Network Policies of the London Plan.”

“Prior to the commencement of the development hereby approved, a survey of the condition of the waterway wall, and a method statement and schedule of works identified shall be submitted to and approved in writing by the Local Planning Authority. Any heritage features and materials identified by the survey shall be made available for inspection by the Canal & River Trust. The repair works identified shall be carried out in accordance with the agreed method statement and repairs schedule by a date to be confirmed in the repairs schedule. Reason: To ensure that the structural integrity of the Regent’s Canal is retained.”

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“Prior to the occupation of the development hereby permitted, full details of the proposed lighting and any CCTV scheme shall be submitted to and approved in writing by the Local Planning Authority, and implemented as agreed. Reason: To ensure that there are no adverse impacts on the ecology of the Regent’s Canal.”

Informatives

“Any access to, or scaffolding oversailing, the Canal & River Trust’s land or water during the construction must be agreed in writing with the Canal & River Trust before development commences. Please contact Jonathan Young in the Canal & River Trust’s Estate Team at jonathan.young@canalrivertrust.org.uk for further information.”

“Any drainage from the site into the Regent’s Canal will be subject to an agreement with the Canal & River Trust before development commences. Please contact Liz Murdoch in the Canal & River Trust’s Utilities Team at liz.murdoch@canalrivertrust.org.uk for further information.

“The applicant/developer should refer to the current Canal & River Trust “Code of Practice for Works affecting the Canal & River Trust” to ensure that any necessary consents are obtained, and liaise with the Trust’s Third Party Work’s Engineer: <http://canalrivertrust.org.uk/about-us/for-businesses/undertaking-works-on-our-property>.”

In addition, in order for the Canal & River Trust to monitor our role as a statutory consultee, please send me a copy of the decision notice.

Should you have any queries please feel free to contact me.

Yours sincerely,

Claire McLean MRTPI
Area Planner - London

Telephone: 0203 204 4409 E-mail: claire.mclean@canalrivertrust.org.uk