

DM/LT/DP4133

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FAO Ms Seonaid Carr
Planning Department
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Dear Ms Carr,

TRANSFORMATION OF THE UGLY BROWN BUILDING (REF: 2017/5497/P)
2-6 ST PANCRAS WAY, LONDON, NW1 0TB

Introduction

1. A planning application, for the redevelopment of the Ugly Brown Building, was submitted to the London Borough of Camden “LBC”) in September 2017. The application is currently pending (ref: 2017/5497/P) and is referred to, herein, as the “original 2017 scheme”.
2. The description of development for the original 2017 scheme 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”.
3. During the course of determination, a number of further design sessions have been held with LBC Planning, Design and Conservation Officers. During these sessions officers have made several suggestions as to how the scheme might be refined. Furthermore, comments from a range of third parties have also been received during the determination period.



4. To address the aforementioned comments revisions have been made to the scheme accordingly. As such, we write on behalf of our client, Reef Estates Limited (“the Applicant”), to submit additional information and application drawings to support revisions to the planning application scheme at the Ugly Brown Building. The enclosed revisions are, herein, referred to as the “revised 2018 scheme”. Whilst the revised 2018 scheme incorporates several scheme changes, the overarching description of development, as set out on Page 1 of this Covering Letter, continues to accurately reflect the revised 2018 scheme.
5. The revisions to the proposed development are explained in full in the supporting Design and Access Statement Addendum prepared by Bennetts Associates.
6. Set out in this Covering Letter is a summary of the scheme revisions and how the design has evolved to address the matters that have been by the Council and other consultees. This Covering Letter provides, where applicable, an updated policy assessment of the scheme revisions accordingly.

Key Design Changes

7. The proposed development has been revised in order to address various design comments.
8. The relevant Local and regional design policies (as set out in the accompanying Design and Access Statement Addendum) have been further considered, by the scheme architects – Bennetts Associates, as the scheme has evolved. Furthermore, a further detail analysis of the ‘Regent’s Canal Conservation Area Appraisal and Management Strategy’ has been undertaken (as set out at section 3 of the accompanying Design and Access Statement Addendum) and has informed the scheme revisions accordingly.
9. The key design changes are set out in detail in the accompanying DAS, along with narrative explaining how the revision respond to comments and provide an enhancement to the original 2017 scheme. In summary, the design changes are as follows:



- Reduced building massing and proximity to the canal edge by repositioning buildings and pulling back upper floors;
- Reduced uniformity of massing facing the canal, breaking-up elevations into smaller-scale elements;
- Opening-up/chamfering of corners and widening of routes to increase visibility throughout the site;
- Pulling back of the residential block to maintain a clear view along the canal aligning with Granary Street;
- Simplified palette of materials with brick the predominant material across the site
- Development of a simple single-storey warehouse-like bay to the elevation of most buildings;
- Simplified elevational treatment of Building B to create a masonry clad base for the hotel element;
- Re-alignment of the elevations and creating greater set-backs at the upper floors facing the canal; and
- All residential units redesigned with a mix of units more in line with Local Plan requirements.

10. In summary, it is considered that the revisions to the scheme positively address the design comments and represent enhancements to the originally submitted scheme. The revised 2018 scheme is 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 buildings has been influenced through detailed consideration of the surrounding local context and through continued discussions with London Borough of Camden Design Officers.

Townscape and Visual Assessment

11. Tavernor Consultancy have undertaken an assessment of the townscape and visual impacts of the revised 2018 scheme. Enclosed is an updated 'Townscape, Visual and Built Heritage Assessment' ("TVBHA") which provides an assessment of the revised 2018 scheme on two designated LVMF views and 11 representative townscape views. The TVBHA concludes that the likely effects of the high-quality development would continue, as per the original 2017 scheme, to range from negligible to major, beneficial.



Built Heritage Assessment

12. The enclosed TVBHA also includes a Built Heritage Assessment which provides an assessment of the likely significant effects of the revised 2018 scheme on the character and appearance of the Regent’s Canal Conservation Area, within which the application site is located. The assessment also considers the likely effects on the settings of individual above ground heritage assets in the vicinity of the site.
13. The THBHA concludes that the character and appearance of the Regent’s Canal Conservation area would 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.

Quantum of Development

14. The aforementioned design changes have had consequential minor impacts on the quantum of proposed development. The total development floorspace has changed from 80,076sqm GIA / 84,358sqm GEA to 80,466sqm GIA / 85,576sqm GEA. The proposed scheme, therefore, represents an uplift of only 390sqm GIA / 1,218sqm GEA. The revised proposed floorspace is split by use in Table 1 below:

Table 1: Proposed Floor Areas

	GIA (sqm)	GEA (sqm)
Business Floorspace (B1)	54,522	56,743
Residential (C3)	7,561	8,203
Flexible Retail (A1-A4)	5,858	6,426
Gym (D2)	1,601	1,692
Hotel (C1)	4,913	6,283
Basement Storage (B8)	6,011	6,229
TOTAL	80,466	85,576

15. The total number of residential units has also increased from 69 units to 73 units (an uplift of 4 units). The mix, in terms of unit sizes and tenures is set out at paragraphs 21



to 24 of this Covering Letter.

Residential Density

16. The residential density of the originally submitted scheme is 690 u/ha (as set out and explained in paras 6.42 – 6.45 of DP9 Planning Statement September 2017). The proposed residential density has altered slightly, by virtue of the proposed number of residential units. A calculation of the revised density, along with an updated planning policy assessment of the revised scheme is set out at Table 2 below:

Table 2 – Residential Density Calculation:

Total Site Area	1.14ha
Residential GIA	7,561
Non-Residential GIA	72,905
Reduced Site Area	0.1026ha
Number of Dwellings	73
Density*	711 u/ha

*Density calculation based on 9% of the site area (reducing the site by 91% - the proportion of non-residential floorspace).

17. 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 711 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 Greater London Authority (“GLA”) confirmed, during pre-application discussions, that a high-density development is supported in this location.

Affordable Housing

18. The proposed development continues to comprise 35% affordable housing based on floor area (both GEA and GIA). This equates to 20 units, by comparison to 18 units in the original 2017 scheme, (10 of which are social-affordable rented and 10 of which are



intermediate).

19. The proposed tenure mix, when considered by floor area (NIA) has been revised to achieve 59% social-affordable rented and 41% intermediate. The proposed mix is aligned with Local Plan Policy H4 which seeks 60% social-affordable rented housing and 40% intermediate housing.

20. It should be noted that the original 2017 scheme comprised 55% social-affordable rented housing and 45% intermediate housing and, therefore, the proposed revisions are an improvement to the scheme in respect of affordable housing provision.

21. It should be noted that informal discussions have taken place with Registered Providers from the Approved Strategic Provider list regarding the design of the proposed affordable housing units.

Residential Unit Mix

22. The revised 2018 scheme proposes 73 residential units comprising a range of unit sizes including several family sized units as set out in Table 3 on the following page:



Table 3: Residential Unit Mix

Market Sector Units		
	Number of Units	Percentage
Studio	10	19%
1-bed	23	43%
2-bed	20	38%
3-bed	0	0%
Private Total	53	100%
Intermediate Units		
1-bed	6	60%
2-bed	4	40%
3-bed	0	0%
Intermediate Total	10	100%
Social-Affordable Rented Units		
1-bed	0	0%
2-bed	3	30%
3-bed	7	70%
4-bed	0	0%
Affordable Rented Total	10	100%

23. The unit mix of the revised 2018 scheme seeks to address comments raised by LBC Housing Officers in respect of the original 2017 scheme. In summary:

- The original 2017 scheme includes family units within the intermediate tenure and a smaller proportion within the social-affordable rented tenure;
- LB Camden Housing Officers have expressed a desire for a larger proportion of family units within the social-affordable tenure, with a subsequent reduction within the immediate tenure;
- As such, there has been a focus, within the revised 2018 scheme, on the provision of family accommodation within the social-affordable tenure as demonstrated within Table 3 above.

24. Overall, the development continues to provide 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.

Amenity Space, Playspace and Public Realm

25. The overarching principles of amenity (both private and communal) and playspace provision set out in the original submission remain applicable. Notwithstanding this, there have been some revisions made to the design of the public realm and quantum of amenity and playspace. These changes are related to the fact that the number and mix of residential units have changed and the relationship and interface of the public realm with the revised building footprints and layouts.
26. The accompanying Landscape Strategy, prepared by Fabrik, sets out a detailed assessment of the planning policy requirements (in respect of both the Local Plan and the London Plan) and how the revised proposed development continues to respond to these accordingly.
27. In summary, the proposed development continues to provide high quality open space and playspace that is integral to the proposed development. The quantum proposed continues to be broadly in accordance with the planning policy requirements and are the maximum achievable in the context of the proposed development.
28. 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 three studio apartments which benefit from large opening windows with views to the south. The balconies are either dual 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 10 Studio apartments in the scheme seven have full sized balconies. The studios without balconies include large full height openings to maximise openness and a relationship with the external environment.



Cycle Parking

29. Cycle parking requirements have changed as a result of the proposed residential unit mix and quantum of commercial development. Long-stay cycle parking will continue to 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 the revised scheme are set out in Table 4 (as prepared by Caneparo Associates) below:

Table 4: Cycle Parking Provision

Land Use	Min. Standard	Min. Requirement	Provision			
			Plot A	Plot B	Plot C	All Plots
Business	1 per 90sqm (GEA)	633	117	157	380	654
Retail	From 100sqm – 1 per 175sqm (GEA)	38	6	-	39	45
Gym	1 per 8 staff	2	-	-	2	2
Residential	1 per 1 bed unit; 2 per 2+ bed unit	107	-	-	126	126
Hotel	1 per 20 bedrooms	5	-	5	-	5
Total	-	785	123	162	547	832

Daylight and Sunlight

30. A revised Daylight and Sunlight Report has been prepared by Waldrams and accompanies this submission.

31. 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.

32. Waldrams have also sought to address comments received in relation to the original 2017 scheme and have additionally analysed the sunlight available to Regent's Canal adjacent to the proposed development and to the uppermost roof of 8-14 St Pancras Way. Analysis has also been undertaken in respect of the daylight and sunlight to canal



boats in the mooring locations along Regent's Canal.

33. The technical analysis is set out in detail in the accompanying report accordingly.

34. Waldrams' overall conclusion within the revised Daylight and Sunlight Report state that *“the proposed scheme allows for all surrounding properties to retain reasonably good levels of daylight and sunlight for an urban environment such as this; the daylight internally to the proposal represents a reasonable level for a scheme in an urban environment and; good levels of sunlight are achieved to the amenity spaces around the scheme”*.

Other Comments

35. In addition to the aforementioned comments being raised by the Council's planning officers several other comments have been raised by various statutory consultees. These comments are addressed within this resubmission material and the table, at Appendix 1 of this Covering Letter, provides responses to the comments accordingly.

Application Documents

36. This revised submission is accompanied by a suite of documents as set out in Table 5 on the following page. In a number of instances statements of conformity are enclosed which demonstrate that the content and conclusions of the respective submission material that accompanied the original 2017 scheme remain applicable. All documents are enclosed in electronic format, as agreed. In addition, a hard copy pack of application drawings (at A3) and the Design and Access Statement Addendum are enclosed.



Table 5: Revised Application Deliverables

Application Deliverables		
No.	Document	Status
1.	Covering Letter (this document) prepared by DP9 Ltd	To be read in conjunction with 2017 Planning Statement
2.	Planning Application Form prepared by DP9 Ltd	Supersedes 2017 Form
3.	CIL Form prepared by DP9 Ltd	Supersedes 2017 Form
4.	Regeneration Statement prepared by Regeneris	Supersedes 2017 Statement
5.	Health Impact Assessment prepared by Regeneris	Supersedes 2017 Assessment.
6.	Proposed Drawings (and drawing schedules) prepared by Bennetts Associates and Fabrik	Supersedes 2017 Proposed Drawings (existing drawings remain applicable)
7.	Design and Access Statement Addendum prepared by Bennetts Associates	To be read in conjunction with 2017 Design and Access Statement
8.	Affordable Housing Statement prepared by Gerald Eve	Supersedes 2017 Statement
9.	Air Quality Assessment prepared by Waterman	Statement of conformity confirming 2017 Assessment remains applicable (with the exception of a replacement document for Appendix B Air Quality Neutral Calculations)
10.	Basement Impact Assessment prepared by GDP	Statement of conformity confirming 2017 Report remains applicable
11.	Ecology Appraisal prepared by Aspect Ecology	Statement of conformity confirming 2017 Appraisal remains applicable
12.	Contaminated Land Assessment (Preliminary Risk Assessment) prepared by GDP	Statement of conformity confirming 2017 Appraisal remains applicable
13.	Daylight and Sunlight Report prepared by Waldrams	Supersedes 2017 Report
14.	Townscape, Visual and Built Heritage Assessment prepared by Tavernor Consultancy	Supersedes 2017 Assessment
15.	Noise Assessment prepared by Waterman	Statement of conformity confirming 2017 Assessment remains applicable
16.	Outline Construction Management Plan prepared by Waterman	Statement of conformity confirming 2017 Plan remains applicable
17.	Flood Risk Assessment and SUDs Strategy prepared by GDP	Supersedes 2017 Assessment
18.	Sustainability and Energy Statement Prepared by Max Fordham	Supersedes 2017 Statement
19.	Transport Assessment Prepared by Caneparo Associates	Statement of conformity confirming 2017 Assessment remains applicable
20.	Arboricultural Impact Assessment Prepared by Aspect Arboriculture	Supersedes 2017 Assessment
21.	Landscape Strategy Prepared by Fabrik	Supersedes 2017 Strategy
22.	Historic Environment Desk-based Assessment (below ground archaeology) Prepared by Waterman	Statement of conformity confirming 2017 Assessment remains applicable
23.	Pedestrian Level Wind Assessment Prepared by RWDI	Supersedes 2017 Assessment
24.	BREEAM Stage 2 Pre Assessment Prepared by Max Fordham	Statement of conformity confirming 2017 Assessment remains applicable
25.	Retail Impact Assessment Prepared by DP9 Ltd	Supersedes 2017 Statement
Documents to Address Comments Set out In Appendix 1		
1.	Letter dated 01 March 2018, prepared by Max Fordham, addressing GLA Energy and Sustainability comments.	



37. The original 2017 scheme was accompanied by a cheque, to address the requisite planning application fee of £152,178. This fee was been calculated as follows:

- Residential Element - 69 dwellings = £21,234
- Commercial Element - 76,654sqm GEA of commercial floor area = £130,944

38. The revised 2018 scheme comprises 73 residential dwellings (£21,694) and 77,373sqm GEA of commercial floorspace = (£131,979). As such, the total requisite fee for the revised 2018 scheme is £153,673 representing an uplift of **£1,495**. Please find enclosed a cheque for this sum, made payable to 'London Borough of Camden' accordingly.

39. We trust that the above and enclosed is all in order, however should you have any further queries please do not hesitate to contact Luke Thrumble or David Morris of this office.

Yours faithfully,

DP9 Ltd

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APPENDIX 1: COMMENTS AND RESPONSES

CANAL AND RIVER TRUST (29 NOVEMBER 2017)	
Summary of Comments	Response
Various design comments raised.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
Suggested that a condition in relation to a canal wall structural survey to be included on the decision notice.	Noted – no response required.
Suggested that a condition in relation to biodiversity roofs design and maintenance regime to be include on the decision notice.	Noted – no response required.
Applicant to 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. Suggested than an informative setting this out is included on the decision notice.	Noted – no response required.
Moorings to be considered as residential properties for the purpose of the daylight and sunlight assessment.	Addressed in full in accompanying Daylight and Sunlight Report prepared by Waldrams.
Suggested that electricity bollards for visitor moorings could be an option to mitigate against the overshadowing of PV panels (could be secured as part of S106 Agreement).	Noted – no response required.
Would expect enhancements to ecology.	Details of Ecological Enhancements are provided within the 2017 Ecological Appraisal prepared by Aspect Ecology.
No lighting which directly illuminates the surface of the canal to be installed.	Noted – no response required.
The development could make use of the canal water for heating and cooling of the development.	Use of the canal water for heating and cooling has been considered within the accompanying Sustainability and Energy Statement prepared by Max Fordham. This initiative has been discounted for reasons stated in the report (technical and continuity of service), potential impact on biodiversity, and cost issues.
Contribution towards towpath improvements sought.	Noted – no response required.

REGENTS CANAL CONSERVATION AREA ADVISORY COMMITTEE (NO DATE)	
Summary of Comments	Response
Various design comments raised.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
Concern regarding daylight / sunlight received by canal boats.	Addressed in full in accompanying Daylight and Sunlight Report prepared by Waldrams.
TFL (10 NOVEMBER 2017)	
Summary of Comments	Response
Bus service enhancements may be required. To determine whether additional capacity is required bus trip generation figures split by direction are required.	Addressed in full response note (submitted under separate cover in January 2018) prepared by Caneparo Associates.
Car parking should be specifically for the use of Ted Baker (to be secured as part of the S106 Agreement).	Noted – no response required.
All residents to be exempt from parking permits in the area (except for Blue Badge holders).	Noted – no response required.
Applicants to confirm whether the cycle parking facilities at basement level are via a ramp or not?	Addressed in full response note (submitted under separate cover in January 2018) prepared by Caneparo Associates.
Request to understand how the access to the cycle parking facilities operates. Drawings suggest that users may need to negotiate more than 3 internal doors and right angled corners. If so, the design does not comply with guidance and should be altered.	Addressed in full response note (submitted under separate cover in January 2018) prepared by Caneparo Associates.
5% of spaces should be suitable for use by larger bikes, such as cargo bikes and those used by disabled cyclists. As a result they should not be on racks.	Addressed in full response note (submitted under separate cover in January 2018) prepared by Caneparo Associates.
Seek a S106 contribution of up to £32,000 for signage enhancements.	Noted – no response required.
Local cycling conditions audit criticised in respect of methodology.	Addressed in full response note (submitted under separate cover in January 2018) prepared by Caneparo Associates.
Permeability through the site to be clearly identified and explained on a plan.	Addressed in full response note (submitted under separate cover in January 2018) prepared by Caneparo Associates.
24/7 unimpeded access to the public realm to be secured by S106 Agreement.	Noted – no response required.

Recommend a condition which encourages the servicing of the development (during both site clearance and construction) by canal boat.	Noted – no response required.
Suggest a possible condition in respect of a full Construction Logistics Plan.	Noted – no response required.
Suggest an updated Travel Plan to be provided prior to occupation.	Noted – no response required.
Identify that the scheme would be liable to pay Mayoral CIL.	Noted – no response required.
THAMES WATER (27 OCTOBER 2017)	
Summary of Comments	Response
Request a Piling Method Statement to be secured by Planning condition.	Noted – no response required.
Request a pre-commencement condition requiring Water Supply Infrastructure Impact Study.	Noted – no response required.
CAMDEN AND ISLINGTON NHS (29 NOVEMBER 2017)	
Summary of Comments	Response
No consideration has been given to the St Pancras Hospital site allocation. Need to demonstrate that the proposals do not prejudice the delivery of the St Pancras Hospital allocation. In the short-medium term, the application should consider relations with the existing and continued hospital use.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
Request that the council include planning conditions to control breakout noise from the development.	Noted – no response required.
Proposed that Transport Logistics Plan secured by Planning Condition.	Noted – no response required.
Various comments in relation to Daylight and Sunlight impacts.	Addressed in full in accompanying Daylight and Sunlight Report prepared by Waldrams.
CAMPBELL REITH (BASEMENT IMPACT ASSESSMENT AUDIT) (JANUARY 2018)	
Summary of Comments	Response
Various technical queries raised	Addressed in full in revised Basement Impact Assessment (submitted under separate cover in February 2018) prepared by GDP.

CAMDEN GREEN PARTY (DEE SEARL) (NO DATE)	
Summary of Comments	Response
Object to height, scale and enclosure to canal.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
Consideration of the canal for deliveries and waste disposal.	As set out in the Outline Construction Management Plan prepared by Waterman, consideration will be given to the use of the canal network to transport construction materials and waste once a principal contractor has been appointed.
FRIENDS OF REGENT'S CANAL (19 DECEMBER 2017)	
Summary of Comments	Response
Object to height, scale and enclosure to canal.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
Consideration of the canal for deliveries and waste disposal.	As set out in the Outline Construction Management Plan prepared by Waterman, consideration will be given to the use of the canal network to transport construction materials and waste once a principal contractor has been appointed.
INLAND WATERWAYS (NO DATE)	
Summary of Comments	Response
Would like to see the canal edge further opened up to reduce overshadowing of the canal.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
Request a planning condition requiring the use of the canal for demolition and construction purposes to be evaluated.	Noted – no response required.
Request that any proposed canal moorings are agreed by the CRT.	Noted – no response required.
LBC PLANNING DEPARTMENT HOUSING COMMENTS (13 DECEMBER 2017)	
Summary of Comments	Action Required
Proposed unit mix falls short of policy targets in terms of providing larger, family units within the social-affordable rented tenure. Conversely larger	Addressed in full in accompanying Affordable Housing Statement prepared by Gerald Eve.

units are provided within the intermediate rent tenure, which in is not supported.	
The design quality of the units are also of concern, particularly the affordable single aspect units which face into the site	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
The proposed existing mix of affordable homes needs to be reconsidered and an offer which provides smaller units in the intermediate rent and larger units within the LAR tenure (which follows the policy set out in H6 & H7 of the Local Plan) should be proposed.	Addressed in full in accompanying Affordable Housing Statement prepared by Gerald Eve.
Require confirmation that a Registered Provider has been selected/shortlisted and has reviewed the existing layout/proposal.	Addressed in full in accompanying Affordable Housing Statement prepared by Gerald Eve.
REGENT'S NETWORK (NO DATE)	
Summary of Comments	Response
Object to height and consider the buildings to be out of character.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
Consider that buildings should be set back from the canal edge.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
Appears to be no consideration for the use of the canal for the moving of freight.	As set out in the Outline Construction Management Plan prepared by Waterman, consideration will be given to the use of the canal network to transport construction materials and waste once a principal contractor has been appointed.
Criticism of architecture, would prefer inset, rather than projecting balconies.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
GLA (31 January 2018)	
Summary of Comments	Response
Various design comments.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
ADF studies should be undertaken to confirm the extent of daylight penetration.	Addressed in full in accompanying Daylight and Sunlight Report prepared by Waldrams.
Various energy / sustainability comments.	Addressed in full in accompanying letter dated 01 March 2018, prepared by Max Fordham, addressing GLA Energy and Sustainability comments.

8-14 ST PANCRAS WAY (19 DECEMBER 2017)	
Summary of Comments	Response
Plot A is hard up against our building, is going to be a very abrupt step in massing and street scape terms when viewed along St Pancras way looking South. This building should have one floor removed or at least a significant setback on the top floor.	Addressed in full in accompanying Design and Access Statement Addendum prepared by Bennetts Associates.
We have planning permission to put photovoltaic panels on our uppermost roof which will be shaded from southern sunlight by this building.	Addressed in full in accompanying Daylight and Sunlight Report prepared by Waldrams.
OTHER THIRD PARTY NEIGHBOURS / RESIDENTS	
Summary of Comments	Response
A number of comments have also been received from third party neighbours and residents. No additional points for consideration have been raised beyond those raised by statutory consultees as set out above in this Appendix.	All comments address within accompanying application documents.