

Town Planning Statement Addendum
St Pancras Commercial Centre, 63 Pratt Street, Camden

On behalf of: Camden Property Holdings Limited

October 2019

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1 Executive Summary

- 1.1 The proposals within this application for planning permission are brought forward by Camden Property Holdings Limited and provide an exciting opportunity to create a high quality, mixed use development within a strategic London location that is currently underused and unattractive.
- 1.2 The site comprises 12 light industrial units which are serviced by a central access road running north. They are used for light industrial (Class B1c) and storage and distribution (Class B8) purposes.
- 1.3 The existing buildings at St Pancras Commercial Centre, 63 Pratt Street, were built circa 30 years ago. They are dated, unattractive and have a neglected appearance. There is a considerable amount of anti-social behaviour that takes place within and around the site which makes it feel generally unsafe, particularly after dark. The long blank brick frontages and negative interaction with the building's boundaries detract from the public realm, and the site's attractive location near to the Regent's Canal.
- 1.4 Architects Caruso St John, along with their design team, have spent the past 12 months designing a sensitive and contextual scheme that delivers the highest standards of sustainable urban design.
- 1.5 The erosion of industrial land in central London is well publicised, as is the current housing crisis - especially for affordable homes. The concept of 'beds and sheds' as a potential solution is receiving increasing recognition from the Government and the Greater London Authority. However, to date, there have been few examples of the concept being put into practice. The proposals at St Pancras Commercial Centre look to successfully combine these two uses in an intelligent, sustainable and well thought out design. It is considered that this proposed development will demonstrate how co-location can be successfully achieved to deliver two key land use priorities for Camden and London.
- 1.6 The proposals offer the opportunity to deliver the intensification of existing light industrial use, provide new, efficient, flexible office floorspace, along with flexible class A1/A3 retail floorspace across the ground floors and the provision of new homes (including affordable). Landscape architects JCLA have designed proposals to

significantly enhance the public realm through hard and soft landscaping to create a new public open space and route through the site.

1.7 The proposals have the potential to generate up to 1,200 new jobs.

1.8 The proposed development will deliver the following benefits:

- Regenerate and transform the existing area;
- Sustainable reuse and regeneration of an underutilised site;
- Provision of 33 much needed homes including 14 affordable units;
- Provision of up to 1,200 new jobs;
- Provision of new active public uses at ground floor level to reactivate street frontages with a mix of shops, restaurants and cafes;
- High quality and attractive urban design, embracing the principles of sustainable design and construction;
- Better building sustainability and energy use through the installation of modern and efficient facilities and systems;
- Improvement to the surrounding public realm including provision of a new public open space increasing permeability and connectivity; and
- Creation of a safe and secure environment for existing and future residents, employees and visitors.

1.9 The proposed development will make a significant contribution to both Camden and London through maximising the opportunity of the site, providing appropriate links to and benefits for the surrounding area and existing communities and will accord with the Council's aspirations and objectives for the wider area.

1.10 The proposals seek to comply with the principles of the National Planning Policy Framework, the adopted London Plan, New London Plan and Camden's Local Plan.

2 Introduction

- 2.1 This Planning Statement is submitted in support of a detailed planning application made on behalf of Camden Property Holdings Limited ('the Applicant') for the demolition and redevelopment of St Pancras Commercial Centre ('SPCC') to create a new mixed use development across three buildings comprising light industrial, storage and distribution, office, flexible retail and residential floorspace (market and affordable), as well as a new public open space and associated landscaping works.
- 2.2 This Statement sets out the town planning case in support of the application. It provides an overview of the site and surroundings and the planning history of the site and assesses the proposed development in the context of national, regional and local planning policy and guidance.
- 2.3 The 4,909sqm (0.49 ha) application site is located at 63 Pratt Street in the London Borough of Camden ('LBC'), to the south east of Camden Town and immediately to the west of the Regent's Canal within the ward of St Pancras and Somers Town. The existing site is a rectangular shaped block bound by Pratt Street to the south, St Pancras Way to the east, Georgiana Street to the north and Royal College Street to the west. The site comprises 12 light industrial units (Class B1c / Class B8) which were constructed in the 1980's and are arranged across two separate terraces which face onto a central access road that runs northwards through the centre of the site.
- 2.4 The application proposals are designed by architects Caruso St John ('CStJ') and are described in Section 5 of this Statement, as well as in the Design and Access Statement, which is submitted in support of this application.
- 2.5 The application proposals are for the total demolition and redevelopment of St Pancras Commercial Centre. The proposals seek to deliver a high-quality and exceptional mixed use development that creates floorspace to house and foster local businesses, office occupiers, retailers and market and affordable homes. The proposals will have many positive effects and contribute significantly to the regeneration of this part of London.

2.6 In summary, planning permission is sought for the following:

Demolition of the existing buildings (Class B1c/B8) and erection of 3 buildings ranging in height from five to seven storeys above ground and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33 residential units (Class C3), flexible retail floorspace (Class A1/A3) together with associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works.

2.7 This planning application has been brought forward following detailed pre-application discussions with the London Borough of Camden ('LBC') and consultation with the Greater London Authority ('GLA'). The application is a strategic application by virtue of its total proposed floorspace and is thus referable to the GLA.

2.8 Other third parties consulted throughout the design process include Local Cabinet Members and Ward Councillors, Elm Village Tenants & Residents Association, King's Cross Environment, King's Cross Neighbourhood Forum, King's Cross Development Forum, Regent's Canal Conservation Area Advisory Committee, Regent's Network, Friends of Regent's Canal, Somers Town Community Association and Somers Town Neighbourhood Forum. Other consultees include Urban Partners (King's Cross and St Pancras Business Partnership) alongside local residents and businesses. The application proposals have evolved over the consultation period and have been revised to accommodate comments made during the consultations.

2.9 The Statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan, against which development within the LBC must be assessed comprises: the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in March 2016. The Local Development Framework ('LDF') which consists of the Camden Local Plan and was adopted on the 03 July 2017, the Local Plan Policies Map (updated March 2019), the Camden Site Allocations Plan (September 2013), Neighbourhood Plans and supplementary Camden Planning Guidance ('CPG') documents.

2.10 The Statement is structured as follows:

- Section 3 - Description of the site and surroundings;
- Section 4 - Details of the site's background and planning history;
- Section 5 - Details of the development proposals;
- Section 6 - Consultation; and
- Section 7 - Relevant planning policy framework.

2.11 The examination of material planning considerations arising from the application proposals are then discussed in the following sections:

- Section 8 - Land use;
 - Section 9 - Residential design and public open space;
 - Section 10 - Design;
 - Section 11 - Heritage, townscape and views;
 - Section 12 - Environment and sustainability;
 - Section 13 - Amenity;
 - Section 14 - Transport and servicing;
 - Section 15 - Other considerations; and
 - Section 16 - Planning obligations.
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- This Statement should be read in conjunction with the accompanying plans and drawings submitted, as well as the following documents which are submitted in support of this application (in addition to this Statement):
 - Covering Letter, prepared by Gerald Eve LLP;
 - Completed Planning Application Form, prepared by Gerald Eve LLP;
 - Completed CIL additional information Form, prepared by Gerald Eve LLP;
 - Affordable Housing Statement, prepared by Gerald Eve LLP;
 - Air Quality Assessment, prepared by Air Quality Consultants;
 - Application Drawings (including Site Location Plan), prepared by Caruso St John LLP;
 - Arboricultural Impact Assessment Report, prepared by Tim Moya Associates;
 - Archaeological Assessment, prepared by Archaeology Collective;

- Basement Impact Assessment (including Structural Overview), prepared by AKT II;
- Construction Management Plan, prepared by Blackburn & Co;
- Contaminated Land Assessment, prepared by Soiltechnics;
- Daylight and Sunlight Assessment, prepared by Point 2 Surveyors;
- Design and Access Statement (including Access Statement and Landscaping Details), prepared by Caruso St John LLP;
- Ecology Report. Prepared by the Ecology Consultancy;
- Flood Risk Assessment, prepared by AKT II;
- Landscape Drawings (and associated Statement), prepared by Jonathan Cook Landscape Architects Ltd;
- Noise, Vibration and Ventilation Assessment (including Noise Impact and Sound Insulation Assessment), prepared by Hann Tucker Associates;
- Servicing Management Plan, prepared by Urban Flow;
- Statement of Community Engagement, prepared by London Communications Agency;
- Sustainability and Energy Statement (including BREEAM), prepared by Norman Disney Young;
- Townscape, Visual Impact and Heritage Assessment, prepared by Peter Stewart Consultancy;
- Transport Assessment (including Travel Plan), prepared by Urban Flow; and
- Tree Survey, prepared by Tim Moya Associates.

2.12 Section 3 of this Statement goes on to consider the application site and its surroundings in more detail.

3 Site and Surroundings

- 3.1 The application site is located in the central southern region of the London Borough of Camden ('LBC'). The site is bounded by four streets: Pratt Street (to the south), Georgiana Street (to the north), Royal College Street (to the west) and St Pancras Way (to the east). Royal College Street and St Pancras Way are busy one-way system traffic routes through the area, while Pratt Street and Georgiana Street provide poor quality pedestrian routes between the site, Camden Town, King's Cross and St Pancras, Camley Street and the surrounding area beyond.
- 3.2 The existing buildings comprise two modern terraced warehouses across 12 light industrial units which are serviced by a central access road running north, and were constructed in the 1980's. These existing post-war buildings are predominantly made up of a brown brick façade with red cladding above and are solely used for light industrial (Class B1(c)) and storage and distribution (Class B8) purposes.
- 3.3 The buildings on site are not statutorily or locally listed and none of the buildings immediately adjoining the site are statutorily listed either. There are two locally listed buildings in close proximity, with the Golden Lion public house on the corner of Royal College Street and Pratt Street and the Prince Albert public house on the corner between Lyme Street and Royal College Street. The nearest statutorily listed buildings are situated to the west on Georgiana Street (Nos. 32-53) and are Grade II listed.
- 3.4 The St Pancras Commercial Centre ('SPCC') is not located within a Conservation Area, although the Regent's Canal Conservation Area is nearby to the site's north and east across Georgiana Street and St Pancras Way (respectively).
- 3.5 The SPCC lies in the St Pancras and Somers Town Ward of Camden. The site is in a relatively undefined area and finds itself between, but not associated with, very distinct character areas of London, including Camden Town, King's Cross and St Pancras and Camley Street. The area immediately surrounding the site lacks identity and it is considered that development would help to define this and assist with creating linkages and stitching this area into its wider context.
- 3.6 The London Plan identifies the application site as being located just outside the Central Activities Zone (CAZ) and Central London Area and not being within any

current or forthcoming Opportunity Areas. The site is also not located within any protected views or viewing corridors within the London View Management Framework (2012).

3.7 Within the Camden Local Development Framework ('LDF'), the site does not fall directly within any designations. Nearby designations include the Regent's Canal Conservation Area and three Site Allocation proposal sites that adjoin the roads neighbouring the site as follows:

- Site 35: Bangor Wharf, Georgiana Street;
- Site 36: 57 - 71 Pratt Street, 10 - 15 Georgiana Street and Royal College Street; and
- Site 37: 24 - 58 Royal College Street.

3.8 As noted above, the site is not located within a Conservation Area, but the Regent's Canal Conservation Area is nearby to the site's north and east. Camden Town Conservation Area is also located two blocks away to the west and the King's Cross Conservation Area lies further down along Royal College Street to the south.

3.9 The site is served most closely by Camden Town Overground Station, which is situated approximately 300 metres to the north west off Bonny Street. Camden Town Underground Station also serves the site, which has an entrance approximately 400 metres to the west at the junction of Camden High Street and Kentish Town Road and which is served by the Northern line. There are also a number of nearby bus routes and networks that surround the site, with the nearest on Royal College Street approximately 50 metres to the south.

3.10 Based on the above, the site has a very good Public Transport Accessibility Level ('PTAL') with the second highest rating of PTAL 6a.

3.11 The buildings surrounding the site are of mixed scale. They range from the part 6, part 7 storey Star Wharf Apartments on the corner of the upward sloping St Pancras Way, to the more modest 2-storey buildings along Georgiana Street.

3.12 Surrounding properties are primarily in residential (Class C3) use to the west and east, with a number of commercial and business uses to the north and south comprising

public houses (Class A4), light industrial (Class B1c) and storage and distribution (Class B8) floorspace.

- 3.13 The site's surrounding area represents the changing context of this area of Camden. There is a significant pipeline of development (proposed and forthcoming) that is being brought forward with the development of the recently approved Ugly Brown Building (Ted Baker site) and the significant site allocations of the Royal Mail Depot and St Pancras Hospital (which includes the new Moorfields Eye Hospital). This on-going design evolution of the St Pancras Canalside and Camley Street is one that offers a number of exciting development and regeneration opportunities to the changing urban context of this area and which is an area that is set to continue to change at a rapid rate in the future.
- 3.14 The site is located close to some of London's major tourist attractions including Camden Town and Markets to the west, the Regent's Canal to the east and King's Cross and St Pancras to the south.

4 Planning History

- 4.1 A thorough review of Camden's online planning history register has been undertaken. The planning history for the site is minimal and therefore this Statement includes applications that are minor in nature.
- 4.2 The most recent application (Ref. 2009/2554/A) at the site was for advertisement consent, which was partially granted on 01 October 2010 for the: **"Continued display of non-illuminated signs on elevations of existing industrial unit, 2 facing St Pancras Commercial Centre courtyard and 2 facing Royal College Street."**
- 4.3 Prior to that there were a number of applications across the site for both planning permission and advertisement consent, with a mix of approvals and refusals.
- 4.4 The most significant application (Ref. PEX0000858) for planning permission was granted on 16 October 2000 for: **"Alterations to provide two new windows to the College Street elevation."**
- 4.5 It is clear from the minimal planning history at the site that the development potential has been considerably underutilised. This planning application will be the first significant development proposed at the site and will hopefully realise the site's substantial development potential.
- 4.6 This application provides the opportunity to deliver the much needed development of this site in order to deliver its associated benefits, and will facilitate regeneration of the local area and wider London, both now and in the future.

5 Development Proposals

5.1 This section of the Statement sets out the key aspects of the proposed development. A full explanation of the proposed development is set out within the Design and Access Statement and depicted on the application drawings, prepared by Caruso St John architects, and submitted with this application. The key details of the proposals are summarised in this section below.

5.2 The description of the development is as follows:

“Demolition of the existing buildings (Class B1c/B8) and erection of 3 buildings ranging in height from five to seven storeys above ground and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33 residential units (Class C3), flexible retail floorspace (Class A1/A3) together with associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works”.

Design Evolution

5.3 A vision has evolved to create an exciting new development, building on the key policy objectives for this site and taking advantage of its many strengths, namely its highly accessible and strategic location, unique characteristics, the mix of building styles and heights in the area, and the potential to create strong pedestrian links through to the surrounding districts.

5.4 The application proposals reflect the aspirations of the planning policy and guidance for this site through re-providing and intensifying the existing uses, making the most efficient use of land and the creation of a highly sustainable mixed use development, including employment, office, flexible retail, residential (including affordable housing) floorspace, providing active frontages, a new public open space and improving the public realm.

5.5 The application proposals have evolved in response to feedback received from Officers at LBC and extensive consultation with local groups, stakeholders and

residents. This is set out in further detail in Section 6 of this Statement and within the Statement of Community Involvement ('SCI'), prepared by London Communications Agency, and submitted in support of this application.

Development Rationale

- 5.6 The existing warehouse buildings are of a poor quality and do not meet modern employment space requirements. The existing buildings do not interact with the street at ground floor level and offer no active frontage due to there being no windows facing outwards onto the adjacent streets.
- 5.7 The public realm surrounding the site is generally in a poor state of repair and there is a considerable amount of antisocial behaviour across the surrounding area. Accordingly, there is significant opportunity for the redevelopment of the existing buildings and improvements to the surroundings in terms of activity and reducing anti-social behaviour.
- 5.8 The intention is that the development proposals will act as a catalyst for change within the immediate vicinity of the site and by facilitating the delivery of a new pedestrian route, public open space and comprehensive public realm enhancements, there should be opportunities for future development to build on the wider regeneration of the area.

Land Use Summary

- 5.9 A summary and comparison of the existing and proposed land use components is set out in table 1 overleaf:

Table 1 - Land Use Areas

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net Change GIA (sqm)
Light Industrial (Class B1(c)) and Storage and Distribution (Class B8)	3,196	3,285	+89
Office (Class B1(a))	0	16,526	+16,526
Retail (Flexible Class A1 and A3)	0	782	+782
Residential (Class C3)	0	4,009	+4,009
Total	3,196	24,602	+21,406 (Uplift)

Table 1: existing and proposed land use areas

Re-provision of Existing Employment Floorspace

- 5.10 The proposed development would deliver 3,285 sqm (GIA) of Light Industrial (Class B1(c)) / Storage and Distribution (Class B8) (i.e. employment) floorspace across two floors at basement and ground floor levels. In line with policy requirements this would re-provide the existing quantum of floorspace on site (3,196 sqm GIA) and deliver an additional 89 sqm (GIA). These units would be accessed through an internal servicing road at ground floor level that would be entered from Pratt Street and exited onto St Pancras Way.

Provision of Office

- 5.11 The proposals seek to provide 16,526 sqm (GIA) of Grade A, flexible office (Class B1(a)) floorspace across 7 storeys (plus basement level). There are a variety of external terraces, on levels 4 and 5 that are directly accessible from the office floorplate, and a communally accessible terrace on Level 6. The total amenity space

provision amounts to 933sqm. The offices would be accessed and serviced from Pratt Street via the private internal servicing road.

Provision of Retail

- 5.12 There are three ground floor flexible retail (Class A1 / A3) units provided as part of the proposals, delivering 782 sqm (GIA) of floorspace. These units would address not only Royal College Street, but also Pratt Street, Georgiana Street, and the proposed new public open space with pedestrian route through. This provision has been designed to be as flexible as possible, allowing for a variety of tenants and unit sizes and which will be finalised later upon completion.

Provision of Residential

- 5.13 The proposal includes the provision of 33 self-contained homes (Class C3) including 14 affordable units (on-site) as a mixture of Affordable Rent and Intermediate Rent homes. The residential floorspace amounts to 4,009 sqm (GIA) split between two apartment blocks (1 market and 1 affordable) across 5 and 6 storeys (plus basement level). A wheelchair accessible unit is also provided in both the affordable housing and market apartment blocks (1 in each).
- 5.14 The breakdown of the proposed residential unit mix is set out in table 2 overleaf:

Table 2 - Residential Unit and Mix Schedule

Residential Units	Existing	Market	Social Affordable	Intermediate	Total
1B 2P	0	7	0	4	11
2B 4P	0	11	2	2	15
3B 5P	0	1	5	0	6
4B 6P	0	0	1	0	1
Total	0	19	8	6	33

Table 2: residential unit and mix layout

- 5.15 Both residential apartment blocks are served by double aspect entrance lobbies entered from Georgiana Street and that go through to the public open space in the inner courtyard area.
- 5.16 All flats have access to their own private amenity space via external balconies which total 511 sqm, as well as provision of dedicated cycle and bin storage.
- 5.17 Further details of the residential design are considered in section 9 of this Statement.

Public Open Space and Public Realm

- 5.18 The proposals have been developed around the provision of a new public open space which would function as usable public realm (up to 670 sqm) in the central courtyard of the site between the commercial office building and the two residential apartment blocks.
- 5.19 As part of the new public open space, the scheme also proposes to introduce a new pedestrian route through the site which would be accessible from Royal College Street, Georgiana Street and St Pancras Way.

5.20 The public open space and public realm proposals are detailed further in section 9 of this Statement.

Scheme Benefits

5.21 Specifically, the proposals will provide the following benefits:

- Bring forward the sustainable regeneration of an underutilised site;
- Deliver 33 new homes ranging from 1-4 bedrooms, 42% of which are affordable based on unit number;
- Retain the existing light industrial and storage / distribution floorspace on site;
- Provide modern Grade A and flexible office floorspace;
- Create up to 1,200 new jobs and bring welcomed employment to this area of Camden;
- Increase spending and investment in the local economy by approximately £1.8m annually;
- Generate approximately £2.0m in business rates for Camden;
- Improve access and servicing arrangements for light industrial and storage / distribution tenants;
- Provide a new public open space in St Pancras for the community to enjoy;
- Improve the surrounding public realm;
- Deliver significant construction employment and associated spending;
- Regenerate and transform the existing area;
- Provide new active public uses at ground floor level to reactivate street frontages;
- Deliver a high quality and attractive urban design, embracing principles of sustainability;
- Create a safe and secure environment for existing and future residents, employees and visitors; and
- Generate a range of planning benefits to be agreed through planning obligations.

5.22 Further details of the design evolution and a full description of the application proposals are contained in the accompanying Design and Access Statement, including details not covered by this section in respect of:

- Scale and Massing;
- Façade Treatment and Materiality; and
- Landscape Proposals.

6 Consultation

- 6.1 This section summarises the outcome of the consultation process, and how the proposed development has evolved in light of comments received during the pre-application process.
- 6.2 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the evolution and preparation of this planning application.
- 6.3 This Section seeks to outline the consultation strategy for the application proposals.

Policy Context

- 6.4 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.5 This is reiterated by the National Planning Policy Framework ('NPPF') February 2019, which emphasises that early engagement and good quality pre-application discussion enables better coordination between public and private resources and provides improved outcomes for the community (paragraph 39). Paragraph 41 stipulates that the more issues resolved at the pre-application stage, the greater the benefits.

Consultation Strategy

- 6.6 The application proposals for the demolition and redevelopment of St Pancras Commercial Centre have been subject to extensive consultation between July 2018 and August 2019 (albeit consultation will continue post submission).
- 6.7 London Communications Agency's ('LCA') Statement of Community Involvement ('SCI') submitted with this application, outlines that the consultation strategy has been made up of five distinct phases as follows:
- Phase 1 - Early Engagement;
 - Phase 2 - Development Management Forum;
 - Phase 3 - Public Exhibition;

- Phase 4 - Developers' Briefing; and
- Phase 5 - Ongoing stakeholder engagement.

6.8 Those consulted include:

- LBC Officers;
- LBC Design Review Panel Members;
- LBC Ward Councillors;
- LBC Development Control Committee Members;
- Residents, Neighbours and Other Stakeholders; and
- Third Parties.

6.9 The proposals have evolved over the consultation period and have sought to accommodate, where possible, comments made during these consultations. These comments have included the scale, massing and design of the proposed buildings, proposed land uses, public realm and public open space, daylight and sunlight and servicing and highways.

6.10 A summary of the consultation strategy is outlined below, and further details of comments received are contained within the supporting SCI, prepared by LCA.

Camden Council Officers

6.11 Extensive pre-application meetings have been held with planning and design officers from LBC since July 2018. Additional affordable housing, highways and transportation and landscape/trees meetings have also taken place at the pre-application stage with relevant members of LBC.

6.12 In summary meetings have been held on the following dates:

- Planning and Design Meeting - Initial Broad Principles Meeting on 10 July 2018;
- Planning and Design Meeting - Including PPA Scoping on 26 September 2018;
- Planning and Design Workshop Meeting - Including Housing, Highways & Servicing and Massing on 04 December 2018;

- Planning and Design Workshop Meeting - Including Land Uses and Affordable Housing on 22 January 2019;
 - Planning and Design Workshop Meeting - Including Highways & Servicing, Facades and Materials on 06 March 2019;
 - Planning and Design Workshop Meeting - Including Public Realm & Open Space, Views, Trees and Affordable Housing on 23 May 2019;
 - Planning and Design Pre-Submission Meeting - Including Highways & Servicing, Trees and Landscaping on 01 August 2019.
- 6.13 Regular and ongoing engagement with Officers at LBC has influenced the scheme evolution to develop a proposal supportable by Officers.
- 6.14 Several iterations of the proposed design were subject to thorough review throughout the pre-application stage and the development proposals have evolved over the past 11 months to incorporate comments received in relation to design wherever possible.
- 6.15 Further details on the design development and changes made as a result of pre-application discussions are included in the Design and Access Statement, prepared by Caruso St John ('CStJ') architects.

Design Review Panel Members

- 6.16 A Design Review Panel ('DRP') meeting was held at Camden Council Offices on the 12 April 2019. The review panel comprised 5 members alongside several key LBC Officers and who were generally supportive of the proposals and its design principles.
- 6.17 Some comments were raised for the architectural team to investigate further. Key design comments related to the scale and massing, specifically the transition and visual softening on the upper levels, the public open space and associated public realm provision.
- 6.18 The design team have sought to respond directly to the comments received at the DRP and the design has been amended accordingly. The Design and Access Statement, prepared by CStJ, sets out the design discussions held and shows how the proposed design has evolved in response to comments received.

Ward Councillors

- 6.19 The three St Pancras and Somers Town Ward Councillors (Cllr Paul Tomlinson, Cllr Roger Robinson, Cllr Samata Khatoon) were all contacted.
- 6.20 A meeting with Ward Councillor Roger Robinson was held on 11 June 2019, with most of the discussion regarding affordable housing, disabled access and security.
- 6.21 A continued dialogue was maintained throughout the consultation period with the Ward Councillors.

Residents, Neighbours and Other Stakeholders

- 6.22 A Development Management Forum ('DMF') was held on 01 May 2019 at St Pancras Community Centre, 67 Plender Street, to present the proposals to local residents, businesses and organisations.
- 6.23 The purpose of the DMF was to familiarise local people with the proposals prior to submission and enable local residents, businesses and organisations to comment on the proposals.
- 6.24 In addition, in order for local residents and businesses to understand the proposals in detail, a public consultation exhibition was held on 06 June 2019 (3.30pm-7.30pm) and 08 June 2019 (10.00am-2.00pm). Before the event, invitations were sent out in the surrounding area by a flyer drop on 23 May 2019 to advise local residents, occupiers and third parties of the applicants' intention to prepare and submit a planning application for the development of the site.
- 6.25 The Applicant and design team presented the proposed scheme to the attendees of the DMF, who predominantly comprised members of the public and existing business tenants of St Pancras Commercial Centre.
- 6.26 A Q&A session then followed with the attendees commenting on the proposals with respect to the light industrial provision, transport and parking, housing, public realm and sustainability.

- 6.27 The Public Exhibition was held at St Pancras Community Centre, 67 Plender Street, NW1 0LB, which is near to the site. The applicant and consultant team were present to discuss the application proposals and respond to any questions.
- 6.28 Across the two days a total of 28 people attended the Public Exhibition, with 18 individual comments submitted, which were all either positive or impartial to the proposals.
- 6.29 The Public Exhibition aimed to demonstrate how the design team has responded to the comments raised during the discussions with Officers and stakeholders.
- 6.30 Following the Public Exhibition, a Developer's Briefing was held on 09 July 2019 at the Crowndale Centre. This gave the Applicant and design team the opportunity to present the application proposals to members of the LBC Planning Committee, Ward Councillors and key relevant LBC Officers. Key people were in attendance, including Ward Cllr Paul Tomlinson, Development Control Committee Chair Heather Johnson and Senior Officers including Daniel Pope, Bethan Cullen and Alex Bushell.

Third Parties

- 6.31 As part of the pre-application process, the applicant met with the GLA on 13 May 2019 to discuss the application proposals.
- 6.32 The formal response from the GLA is still awaited.

Statement of Community Involvement

- 6.33 A full and comprehensive consultation has been carried out using many mechanisms to communicate the thoughts and views of the local community and key stakeholder groups directly to the project team and which has informed the design process.
- 6.34 The SCI prepared by London Communications Agency has been submitted with this application and demonstrates the thorough approach taken towards the consultation process.

- 6.35 Overall the SCI demonstrates that a meaningful engagement process was undertaken in respect of the proposals, which has resulted in the design team being able to capture consultee comments and evolve the scheme accordingly.

Summary

- 6.36 The consultation strategy has been extensive and has sought to engage with statutory and non-statutory consultees including residents, local businesses, community groups and politicians throughout the design process.
- 6.37 The application proposals have been revised, where possible, to reflect comments raised throughout consultation, particularly in relation to the proposed building design, public open space and public realm and affordable housing.
- 6.38 The applicant remains committed to maintaining an open dialogue with locals and stakeholders throughout the determination and construction phases of the proposed development.

7 Planning Policy Context

- 7.1 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
- i. The London Plan. The London Plan presents the Mayor's spatial development strategy for London. This document has been consolidated with alterations since 2016. Hereinafter this will be referred to as the London Plan ('LP').
 - ii. The Camden Local Development Framework ('LDF'). The LDF is made up of Camden's Local Plan (2017) and various adopted Camden Supplementary Planning Guidance documents.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

National Planning Guidance

The National Planning Policy Framework (NPPF) February 2019

- 7.3 The NPPF document sets out the Government's planning policies for England and how these are expected to be applied. It summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
- 7.4 The NPPF introduces the presumption in favour of sustainable development although it makes it clear that the Development Plan is still the starting point for decision making.
- 7.5 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their

own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

- 7.6 One of the core planning principles of the NPPF is that planning should not simply be about scrutiny but instead be “a creative exercise in finding ways to enhance and improve the places in which people live their lives”.
- 7.7 The Ministerial Statement, ‘Planning for Growth’, emphasises the importance of securing economic growth and employment. The document states that when considering planning applications, Local Planning Authorities should support enterprise and facilitate housing, economic and other forms of sustainable development.
- 7.8 In terms of the historic environment, Paragraph 193 of the National Planning Policy Framework sets out that great weight should be given to the conservation of heritage assets. Paragraphs 194-195 set out the tests that need to be met where either ‘substantial harm’ or ‘less than substantial harm’ is caused to heritage assets.
- 7.9 Where any harm is caused the public benefits of the proposal should outweigh this harm.

Planning Practice Guidance, 2014

- 7.10 The Planning Practice Guidance was produced and published by the Department of Communities and Local Government (‘DCLG’) in March 2014. This resource makes Planning Practice Guidance available entirely online and allows users to link between the NPPF and relevant planning practice guidance, as well as other different categories of guidance.

Regional Planning Policy

The London Plan

- 7.11 The London Plan (as amended, 2016) aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 years. The London Plan includes London-wide planning policy guidance and sets

the relevant regional planning policy guidance for the London Borough of Camden and forms a component part of the statutory development plan.

- 7.12 The Mayor considers that the greatest challenge faced in London is to accommodate significant growth in ways that respect and improve London's diverse heritage while delivering the vision for an exemplary, sustainable world city.

The draft New London Plan

- 7.13 The draft New London Plan ('NLP') was published in December 2017. Consultation took place on the draft document up until 2 March 2018. The Mayor's Minor Suggested Changes to the London Plan were published on 13 August 2018. Adoption of the NLP is targeted for late 2019 / early 2020. Once adopted, this will supersede the current London Plan. It is therefore a material consideration in the determination of this planning application.

Local Planning Policy: Camden Local Plan (2017)

- 7.14 At the local level, Camden's Local Plan (2017) was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

Supplementary Planning Guidance

- 7.15 Other relevant LBC Supplementary and Design Guidance of relevance to this application includes:
- Camden Planning Guidance - Design (March 2019);
 - Camden Planning Guidance - Basements (March 2018);
 - Camden Planning Guidance (CPG2) - Housing (May 2006 updated March 2019);
 - Camden Planning Guidance - Interim Housing (March 2019);

- Camden Planning Guidance - Employment Sites and Business Premises (March 2018);
- Camden Planning Guidance 3 (CPG3) - Sustainability (July 2015, updated March 2018);
- Camden Planning Guidance - Energy Efficiency and Adaptation (March 2019);
- Camden Planning Guidance 6 - Amenity (September 2011, updated March 2018);
- Camden Planning Guidance - Public Open Space (March 2018);
- Camden Planning Guidance - Air Quality (March 2019);
- Camden Planning Guidance - Transport (March 2019);
- Camden Planning Guidance - Trees (March 2019);
- Camden Planning Guidance - Developer Contributions (March 2019); and
- Camden Planning Guidance - Water and Flooding (March 2019).

7.16 In addition, it should be noted that there is a draft Camley Street Area SPD document being prepared for consultation. This placeshaping document ('Canalside to Camley Street - a new quarter in St Pancras') could therefore be a material consideration in the determination of this planning application.

7.17 The following GLA Supplementary Planning Guidance documents are also material considerations:

- Affordable Housing and Viability (August 2017);
- Housing (March 2016);
- Town Centres (July 2014);
- Accessible London: Achieving an Inclusive Environment (October 2014);
- Shaping Neighbourhoods: Character and Context (June 2014);
- Sustainable Design and Construction (April 2014); and

- The Control of Dust and Emissions during Construction and Demolition (July 2014).

Site Specific Allocations

- 7.18 The site is not located within any site specific allocations in the London Plan, NLP, LDF Policies Map or LDF Policies Map Alterations.

Legislative Framework

- 7.19 Given the site's location near to a conservation area, statute regarding the historic environment is relevant.
- 7.20 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Principal Planning Matters

- 7.21 The development proposals have been assessed against the following principal planning matters:
- i. Land Use;
 - ii. Design;
 - iii. Heritage, Townscape and Views;
 - iv. Environment and Sustainability;
 - v. Amenity; and
 - vi. Transport and Servicing.

8 Land Use

- 8.1 This section assesses the proposals against relevant national, regional and local land use planning policies.

Light Industry / Storage and Distribution

Policy

- 8.2 At a national level, the NPPF advises [*inter alia*] that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century. Paragraph 80 of the NPPF states [*inter alia*] that significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs.
- 8.3 At a regional level, London Plan Policy 4.1 promotes the continued development of a strong, sustainable and increasingly diverse economy across parts of London. It seeks to ensure the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and SME's, including the voluntary and community sectors and maximise the benefits from new infrastructure to secure sustainable growth and development.
- 8.4 London Plan Policy 4.4 outlines that the Mayor will adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space.
- 8.5 New London Plan ('NLP') Policy E4 states that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained, whilst NLP Policy E7 outlines their potential for intensification, co-location and substitution.
- 8.6 Moreover, NLP Policy E7 part D 3) states that mixed use or residential development proposals on Non-Designated Industrial Sites should be supported where industrial,

storage or distribution floorspace is provided as part of mixed use intensification (see also Part B of Policy E2).

8.7 At a local level, Camden Local Plan Policy E2 encourages the provision of employment premises in the borough and seeks to protect existing employment premises or sites that are suitable for continued business use. The policy states that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business use provided that [*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 in particular industry, light industry, and warehouse/logistic uses that support the functioning of the local economy;
- it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the local economy will not cause harm to Camden's local economy and will be to a sustainable location;
- the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
- the scheme would increase employment opportunities for local residents, including training and apprenticeships;
- the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant; and
- for larger employment sites, any redevelopment is part of a comprehensive scheme.

8.8 Camden Employment Sites and Business Premises CPG (March 2018) outlines how Camden seeks to protect existing employment sites and premises that meet the needs of businesses and employers and seeks to ensure Camden offers a range of types and sizes of employment space. The CPG also states that the Council will use section 106 planning agreements to secure local employment and training initiatives.

Assessment

- 8.9 The site is located in a highly accessible area that is well served by public transport (PTAL rating 6a). As such, the re-provision and intensification of light industrial floorspace in this location is further supported in principle.
- 8.10 The existing employment (Class B1c and B8) premises are out-dated, of a poor quality and no longer fit for purpose. It is proposed to significantly enhance the quality and increase the quantum of light industrial floorspace to create a high quality commercially led mixed use scheme.
- 8.11 Specifically, the proposed development involves the intensification of the existing employment uses (Class B1(c)) & Class B8) at the site, through the demolition of the current warehouse buildings and construction of new buildings to provide 3,285 sqm (GIA) of light industrial (Class B1(c)) and storage and distribution (Class B8) floorspace (an uplift of 89 sqm (GIA) across basement and ground floor levels). This represents an increase in the industrial floorspace capacity of circa 3%. In this context, the proposals accord with the London Plan, NLP Policies E4 and E7 and Local Plan Policy E1(ii) through the intensification of the existing employment use of the site.

Office

Policy

- 8.12 At a national level, the NPPF sets out the Government's commitment to securing economic growth and advises that plans should support an economy fit for the twenty first century. Paragraph 80 of the NPPF states that [*inter alia*] significant weight should be placed on the need to support economic growth and productivity, taking into account wider opportunities for development.
- 8.13 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local Planning Authorities should consider the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect

benefits such as increased consumer choice, more viable communities and more robust local economies.

- 8.14 At a regional level, London Plan Policy 4.2 encourages boroughs to support the management and mixed use development and redevelopment of office provision. Policy 4.2 (D) specifically supports increases in current stock where there is evidence of sustained demand.

- 8.15 London Plan Policy 4.2 goes on to state that the Mayor will consolidate and extend the strengths of the diverse office markets elsewhere in the capital by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable, complementary uses. It also states that renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility will be supported. Increases in current stock will be supported where there is a strategic and local evidence of sustained demand for office-based activities.

- 8.16 NLP Policy E1 part A states that [*inter alia*] improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed use development.

- 8.17 Part D of NLP Policy E1 goes on to state that [*inter alia*] the diverse office markets in outer and inner London (outside the areas identified area) should be consolidated and, where viable - extended.

- 8.18 At a local level, Camden Local Plan Policy E1 explains that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. In order to do so they will maintain and support stock suitable for a variety of businesses of differing requirements and sizes. New office development is directed towards growth areas, Central London and Town Centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. In order to do this Camden will [*inter alia*]:

- a. support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;
- e. promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives;
- g. support Camden's industries by:
 - 1) safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;
 - 2) supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;
- i. recognise the importance of other employment generating uses, including (amongst others) retail.

Assessment

- 8.19 The site's accessible and strategic location in close proximity to areas requiring business and employment floorspace including King's Cross and St Pancras, Camden Town and the Knowledge Quarter, support the need for commercial office (Class B1a)) floorspace and other employment generating uses at the site.
- 8.20 The proposals also seek to maximise the site's capacity for the provision of employment floorspace and provide an additional 16,526 sqm (GIA) of new Grade A office (Class B1(a)) floorspace across basement, ground and 6 upper levels. The provision of a significant quantum of office floorspace will help to meet the strategic and local demand for office floorspace and will consolidate and improve the area's business offer as well as enhance London's strategic competitiveness in accordance with London Plan Policy 4.2, NLP Policy E1 and Camden Local Plan Policy E1.
- 8.21 The office floorspace is proposed to be flexible in nature so that it can meet modern occupier requirements. The broadly rectangular floorplate makes the commercial office floorspace of the development easily divisible to appeal to a range of potential

occupiers. This will also allow the building to be adapted in the future in order to meet changing market and office occupier requirements, ensuring that it is future proofed. Offering flexibility is considered paramount to appealing to a range of occupiers and is required in order to attract a variety of different types and sizes of business.

- 8.22 The office floorspace proposed will benefit from the provision of external amenity space as a result of setbacks at fourth and fifth floor levels, providing private amenity space for the office occupiers, encouraging wellness, in line with Camden Local Plan Policy A2.
- 8.23 At sixth floor roof level, there is an extensively planted shared roof terrace available to all building users (across 214 sqm). This communal terrace extends 52m in length with capacity for up to 130 people.
- 8.24 These amenity spaces will provide a refuge for the office users (and other building users for the roof terrace) with opportunities for outdoor seating, informal meeting and relaxation space within an overriding presence of a green background. The dense planting will create a lush environment that will be visible from the street and in turn enhance views within the wider setting of the site.

Conclusion

- 8.25 The proposals will facilitate modern business and employment occupier demands and are in accordance with the policy aspirations of the NPPF, London Plan, NLP and Camden Local Plan which seek to intensify and co-locate employment floorspace including industrial land and the provision of offices to increase and enhance the quality and flexibility of London's commercial offer.
- 8.26 The development proposals will intensify and substantially exceed the employment floorspace currently provided at the site and will lead to an increase in the types of companies able to operate and increase the variety of job provision in the area, significantly contributing towards meeting the targets set out in the London Plan, NLP and Local Plan Policies.

8.27 Specifically, the proposed development would meet the tests of Local Plan Policy E2 in the following ways:

- c) the proposed development would intensify the site's existing employment uses and provide an additional 89 sqm (GIA) of Class B1c and B8 floorspace and create 16,526 sqm (GIA) of new office (Class B1(a)) floorspace;
- d) the site will remain available for use by similar business tenants i.e. within Class B1(c) and Class B8 and potentially retain existing business tenants (subject to leasehold discussions);
- f) The proposals have been designed to create a building which will provide flexible internal floorspace. The open floor plates can then be subdivided as required by tenants, depending on their requirements;
- g) endeavours will be made to ensure apprentices are on site during the construction phase; and
- h) the proposed development includes other priority uses such as housing, affordable housing and open space and would not prejudice the continued operation of businesses on the site.

8.28 The proposed scheme will create a significant number of jobs both during construction and once occupied and operational. Once constructed, it is estimated that the total number of jobs that will be generated by the office (Class B1(a)) floorspace will be up to 1,200 jobs (note - this assumes an average employment density across the employment floorspace of 1:16). The construction period of the scheme will generate approximately 200 FTE jobs during the life of the demolition and construction.

8.29 The proposed development is considered to directly respond to the challenges, aims and objectives of planning policy, including helping to deliver against employment demand and growth requirements, in a strategic location, where demand for employment floorspace will continue to grow. The proposals will support a stronger and more diverse business base with the provision of modern, flexible floorplates which respond directly to the London Plan, NLP and Local Level Policy requirements.

- 8.30 Overall, the enhancement and intensification of the site and associated wider employment floorspace proposed as part of the scheme are compliant with the aims of the NPPF, London Plan, NLP and Local Plan policies.

Mixed Use

Policy

- 8.31 At a national level, the NPPF encourages mixed use developments in order to promote social interaction and to encourage multiple benefits from land.
- 8.32 At a regional level, Policy 4.3 of the existing London Plan states that for areas outside of the Central Activities Zone (CAZ) and the Isle of Dogs Opportunity Area, mixed use redevelopment should support consolidation and enhancements to the quality of the remaining office stock.
- 8.33 NLP Policy E7 part D 3) states that mixed use or residential development proposals on Non-Designated Industrial Sites should be supported where industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part B of Policy E2).
- 8.34 At a local level, a key aim of Camden's Local Plan, through Policy H1 is to deliver housing within the Borough, which is the priority land use. Specifically, Policy H1 seeks to secure a sufficient supply of homes and seeks to maximise the supply of housing. The target for new homes has been increased to 16,800 additional homes from 2015/16-2030/31, including 11,130 additional self-contained homes.
- 8.35 Policy H2 of the Local Plan states that where non-residential development is proposed the Council will promote and encourage the inclusion of self-contained homes as part of a mix of uses in all parts of the borough. In the Central London Area and defined Town Centres, Policy H2 requires 50 per cent all additional floorspace to be self-contained housing (subject to criteria), although this site does not fall within these defined areas.

Assessment

- 8.36 It is proposed to create a mixed use development, comprising office (Class B1(a)) light industrial (Class B1(c)) / Class B8), flexible retail (Class A1/A3) and residential (Class C3) uses. The proposed development results in a significant uplift of gross internal floorspace by 21,406sqm (GIA) through the total demolition and redevelopment of the site.
- 8.37 The site is not situated within the Central London Area or any of the defined Town Centres and therefore Policy H2 promotes and encourages the inclusion of self-contained homes as part of a mix of uses on this site, rather than requiring 50 per cent of the additional floorspace to be self-contained housing (Class C3).
- 8.38 As acknowledged in the Local Plan, the Council gives priority to housing but not to the extent that this priority should override the need to protect some non-residential uses across the borough, nor should its inclusion within a development's mix of uses adversely impact on the efficiency an overall quantum of the development. The priority for housing needs to be considered in the context of the characteristics of specific areas, sites and properties.
- 8.39 The proposals seek to provide 4,009 sqm (GIA) of on-site self-contained housing (Class C3) across 33 units at 19% uplift of the proposed total floorspace.

Conclusion

- 8.40 Given the provision of four different land uses at the site and the need to balance their conflicting requirements, it is considered that the provision 33 units comprising 4,009 sqm (GIA) of additional residential floorspace is the maximum quantum of housing that could be provided on-site as part of a balance mix of uses.
- 8.41 The proposed mixed use development is considered to accord with the themes of the NPPF, the London Plan (existing and new) and Camden's Local Plan mixed use policy requirements, namely NLP Policy E7 and Local Plan Policy H2.

Flexible Retail

Policy

- 8.42 At a national level, paragraph 91 of the NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places.
- 8.43 The NPPF guidance makes it clear that local planning authorities should promote places that facilitate social interactions, that are safe and accessible and enable and support healthy lifestyles, through - for example, mixed-use developments, strong street layouts and active street frontages.
- 8.44 At a regional level, London Plan Policy 4.8 seeks to support a successful and diverse retail sector.
- 8.45 NLP Policy E9 supports a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services.
- 8.46 At a local level, Local Plan Policy E1 part (i) recognises the importance of other employment generating uses, including retail uses.
- 8.47 Local Plan Policy G1 demonstrates the Council's ambition to create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes the best use of its site and supporting a mix of uses on site where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Assessment

- 8.48 The existing site has limited uses at ground floor level and therefore currently contributes very little to the activity at street level. The proposed development

therefore offers a significant opportunity to enhance the provision of retail uses to improve its offer, competitiveness and to help regenerate and activate the area.

- 8.49 It is proposed to introduce flexible retail (Class A1/A3) uses at ground floor and basement levels of the site, with a total quantum of 782 sqm (GIA) of flexible retail floorspace proposed (an uplift of 782 sqm GIA) across the site.

- 8.50 In total there would be three flexible retail units across the site, one unit measuring 256 sqm (GIA) at the corner of Royal College Street and Georgiana Street, another on Georgiana Street across 129 sqm (GIA) and the largest unit at the junction of Royal College Street and Pratt Street underneath the office building comprising 382 sqm (GIA).

- 8.51 The development site lies approximately 400 metres to the east of the designated Camden Town Centre and designated retail frontages. Given the site's proximity to these Town Centre designations, the observed lack of retail offer in the immediate area and inactive frontages across the site, it is considered appropriate to include flexible retail uses at ground floor level.

- 8.52 The layout of the flexible retail units as submitted, are at this stage, indicative only. The unit sizes proposed, and the possibilities for subdivision and amalgamation provide flexibility to respond to occupier requirements at the point of delivery.

- 8.53 Retail servicing for all of the flexible retail units would take place on site via the internal servicing road, where the office building would also be serviced from. Further delivery and servicing details are contained within the Delivery and Servicing Plan, prepared by Urban Flow and submitted in support of this application, Of course, further details would be made available via the implementation of a strict operational and management plan upon completion.

- 8.54 The proposed flexible retail elements would bring the ground floor of the building to life and the scheme layout maximises activity at street level along Georgina Street and Royal College Street. The provision of active frontage and an animated street scene will enhance the vitality of the area and create the conditions for economic

growth that harness the benefits for local residents and businesses, in accordance with the objectives of Camden Local Plan Policy E1.

- 8.55 In addition, the flexible retail floorspace and provision of active frontages will increase the natural surveillance at the site, which is important given the areas high crime rate and should help to deter criminal activity and anti-social behaviour.
- 8.56 The shopfronts have been designed to be contextual and therefore sensitive to the surrounding area and nearby Regent's Canal Conservation Area, with any advertisements to be controlled via separate advertisement consent applications at the appropriate time.
- 8.57 The proposals for flexible uses at ground floor level will deliver the following benefits to the site and its immediately surrounding area:
- deliver employment generating uses to support the proposed enhanced employment/business floorspace, in line with Camden Local Plan Policy E1;
 - reactivate the street scene by introducing uses which will encourage interaction between the street and the inside of the site;
 - revitalise the ground floor at the site which is a very poor contributor to the local area;
 - enable ground floor façade improvements to enhance the character and appearance of the area and nearby Regent's Canal Conservation Area;
 - increase the natural surveillance at the site and benefit community safety;
 - and
 - contribute to the character and function of this important part of London between King's Cross, St Pancras and Camden Town.

Conclusion

- 8.58 The proposed flexible retail units will provide much needed retail uses to the site and to an area with an observed lack of retail floorspace.
- 8.59 As well as being available to users of the commercial floorspace, it is considered that the active uses will offer convenience for the local user, but also for visitors and tourists, which reflects the site's strategic location between King's Cross and St

Pancras and Camden Town. The ground floor uses will also provide passive surveillance helping to reduce the level of anti-social behaviour within the area and improve the safety and quality of the ground level external environment.

- 8.60 Therefore, the proposed retail floorspace is considered appropriate for the site and is compliant with Planning Policy at all levels.

Residential

- 8.61 At a national level, paragraph 59 of the NPPF (2019) states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 8.62 NPPF paragraph 60 states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 8.63 In addition to this, paragraph 61 notes that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- 8.64 At a regional level, housing provision is a key priority of the London Plan, and Policy 3.3 sets an annual housing target for the city of 42,000 net additional homes. Furthermore, this policy seeks to increase housing supply and states that the Mayor recognises the pressing need for more homes in London in order to promote

opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.

- 8.65 Table 3.1 of the London Plan subsequently sets out housing targets for each borough for the period 2015-2025. The annual average housing supply monitoring target for Camden is 889 units. Part E of Policy 3.3 outlines that this development capacity should be realised through [*inter alia*] the intensification of brownfield land and mixed use redevelopment, especially of surplus commercial capacity.
- 8.66 London Plan Policy 3.8 relates to housing choice. It states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. The policy states that taking account of the housing requirements at all levels, Boroughs should ensure that new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these.
- 8.67 NLP Policy H1 seeks to increase housing supply across London and sets out ten-year targets for net housing completions that each local planning authority should plan for.
- 8.68 Part B 2) of NLP Policy H1 outlines that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, including (but not limited to) the following sources of capacity:
- f) industrial sites that have been identified through the processes set out in Policy E7 Industrial intensification, co-location and substitution.
- 8.69 In the NLP, the Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) which has identified need for 66,000 additional homes per year across London.
- 8.70 Table 4.1 of the NLP sets out borough housing targets for the period 2019/20-2029/30. The ten-year housing target for Camden is 10,860 units.
- 8.71 At a local level, Camden Local Plan Policy H1 seeks to secure a sufficient supply of homes and seeks to maximise the supply of housing. The target for new homes has

been increased to 16,800 additional homes from 2015/16-2030/31, including 11,130 additional self-contained homes.

- 8.72 As set out above, Policy H2 of Camden's Local Plan seeks to maximise the supply of self-contained homes as part of a mix of uses.
- 8.73 Camden Planning Guidance on Housing and Interim Housing provide specific guidance on both housing and affordable housing in mixed use development and specifically the requirements of Local Plan Policies H2 and H4.

Assessment

- 8.74 The proposals seek to provide 4,009 sqm (GIA) of on-site self-contained housing (Class C3) across 33 units at 19% uplift of the proposed total floorspace.

Affordable Housing

Policy

- 8.75 At a national level, paragraph 20 of the NPPF sets out the strategic policies and identifies that sufficient provision should be made for housing, including affordable housing. In this context, Paragraph 61 states that housing should be provided for different groups in the community including those who require affordable housing. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless specific criteria can be met.
- 8.76 At a regional level, London Plan Policy 3.11 states that across London the target is to provide on average 17,000 more affordable homes per year over the plan period. 60% should be for social rent/affordable rent and 40% for intermediate rent or sale.
- 8.77 London Plan Policy 3.12 states that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes.

8.78 When deciding the maximum reasonable amount of affordable housing, the following should be taken into account:

- Current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8, 3.10 and 3.11;
- Affordable housing targets adopted in line with Policy 3.11;
- The need to encourage rather than restrain residential development;
- The need to promote mixed and balanced communities (Policy 3.9);
- The size and type of affordable housing needed in particular locations; and
- The specific circumstances of individual sites.

8.79 Policy 3.13 of the London Plan states that affordable housing will be required on sites which have the opportunity to provide 10 or more homes on-site, applying density guidance set out in Policy 3.4 of the London Plan.

8.80 The NLP has a strategic objective to deliver more genuinely affordable housing, with an identified need for circa 43,500 affordable homes per year.

8.81 Policy H5 of the NLP has a strategic target of 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include [*inter alia*]:

- requiring residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6).

8.82 NLP Policy H6 outlines the threshold approach that applies to major development proposals which trigger affordable housing requirements, with a minimum of 35 per cent affordable housing on gross residential development.

8.83 NLP Policy H6 part C gives the criteria that applications must meet in order to qualify for the Fast Track Route of the threshold approach. These criteria include the following:

- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy. Where agreed by the borough, small housing

developments may follow the Fast Track Route where they meet the relevant threshold level off-site or as an in lieu payment.

2) be consistent with the relevant tenure split (see Policy H7 Affordable housing tenure). Small housing developments may follow the Fast Track Route where the tenure split is to the satisfaction of the borough.

3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant.

4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H5 Delivering affordable housing and have sought grant to increase the level of affordable housing.

- 8.84 Part D of NLP Policy H6 goes onto state that fast tracked applications are not required to provide a viability assessment at application stage.

- 8.85 NLP Policy H5 part 4A outlines that industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

- 8.86 NLP Policy E7 part D 3) states that mixed use or residential development proposals on Non-Designated Industrial Sites should be supported where industrial, storage or distribution floorspace is provided as part of mixed use intensification (see also Part B of Policy E2).

- 8.87 At a local level, Camden Local Plan Policy H4 states that the Council will aim to maximise the supply of affordable housing and exceed the borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31 and will aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.

- 8.88 Policy H4 identifies that the Council expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.

8.89 Policy H4 part e goes on to state that an affordable housing target of 50% applies to developments with a capacity for 25 or more additional dwellings.

8.90 Policy H4 sets out that the guideline mix of affordable housing types is 60% social rented housing and 40% intermediate housing.

Assessment

8.91 The proposed development will provide 14 much needed self-contained affordable housing units at 44% of the overall residential provision by floor area (sqm GIA).

8.92 In line with Local Plan Policy H4, the percentage split of the affordable housing units is policy compliant at 60% affordable rent housing and 40% intermediate rent, as follows:

Table 3 - Affordable Housing Split

Unit	Affordable Rent	Intermediate Rent	Total
1B 2P	-	4	4
2B 4P	2	2	4
3B 5P	5	-	5
4B 6P	1	-	1
Total	8 (60%)	6 (40%)	14

Table 3: Affordable housing split

8.93 The GLA and LBC calculate the percentage of affordable housing on schemes differently. The GLA measure the level of affordable housing (as a percentage) on habitable rooms, whilst Camden Council calculate the percentage of affordable housing on floor area GIA (sqm).

8.94 Under NLP Policies H5 (part 4A) and E7, there is no net loss of industrial capacity proposed at the site, indeed there is an increase (by 89 sqm GIA), and therefore the affordable housing percentage threshold is 35 per cent. As such, the development qualifies for the Fast Track Route.

8.95 The development proposes to deliver 42% affordable housing (based on unit number). When broken down further, the proposed scheme would deliver affordable housing (as a percentage) across the following relevant formats:

Table 4 - Affordable Housing Percentage Split

Affordable Housing Block	% of total residential provision
Number of habitable rooms	50%
Area of habitable rooms	43%
Unit Number	42%
GIA (sqm)	44%

Table 4: Affordable housing as a percentage of residential provision

Conclusion

8.96 The proposed quantum of affordable housing is in accordance with national, regional and local Planning Policy as it provides more than the 35% threshold of affordable housing on site as well as the maximum reasonable amount and contributes towards the national, regional and local shortage in affordable housing generally.

8.97 Further details with respect to affordable housing are set out in the Affordable Housing Statement, prepared by Gerald Eve LLP and submitted in support of this application for planning permission.

9 Residential Design and Public Open Space

- 9.1 This section considers the technical design of the proposed residential units, including unit mix, unit sizes, private amenity space, accessibility, and aspect and privacy. This section does not consider the external design of the building which is considered within Section 10.

Unit Mix

Policy

- 9.2 At a national level, NPPF paragraph 61 notes that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- 9.3 At a regional level, the objective of London Plan Policy 3.8 is [*inter alia*] to ensure that development delivers an appropriate mix of house sizes and tenures to meet identified needs within London. In pursuance of this policy objective new development should offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these.
- 9.4 Further to this, London Plan Policy 3.9 advises that a more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.
- 9.5 The Mayor's Housing SPG sets out the need for different unit sizes in private, affordable or mixed residential schemes. The SPG only sets out strategic London wide requirements and does not set targets for individual sites. The SPG recognises that housing should be appropriate to context and constraints within a particular site and that the requirement for units of different sizes varies widely between local areas.

- 9.6 In considering the mix of uses and the appropriate contribution to the housing supply in Camden, the strategic aim of the Council is to ensure that a variety and mix of housing is provided in the Borough to suit the widely differing social and economic needs of residents.
- 9.7 Policy H7 of Camden's Local Plan states that the Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. In order to do this the Council will ensure that all housing developments contribute to meeting the priorities set out in the Dwelling Sizes Priorities Table and include a mix of large and small homes. The Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development.
- 9.8 At supporting paragraph 3.189 Camden's Dwelling Size Priorities for housing are as follows:

Table 5 - Camden's 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

Table 5: Camden's dwelling size priorities table (Table 1 of Camden's Local Plan)

Assessment

- 9.9 The two proposed dedicated residential apartment block buildings have been separated into one affordable block and one market block, and will provide the following residential units:

Table 6.1 - Affordable Housing Block Residential Unit Mix

Affordable apartment block building				
Unit Type	No. Persons	Affordable Rent	Intermediate Rent	Total Units
1 Bed	1B / 2P	-	4	4
2 Bed	2B / 4P	2	2	4
3 Bed	3B / 5P	5	-	5
4 Bed	4B / 6P	1	-	1
Total		8	6	14

Table 6.1: Proposed affordable block residential unit mix
Table 6.2 - Market Housing Block Residential Unit Mix

Market apartment block building		
Unit Type	No. Persons	Total Units
1 Bed	1B / 2P	7
2 Bed	2B / 4P	11
4 Bed	4B / 6P	1
Total		19

Table 6.2: Proposed market block residential unit mix

- 9.10 The affordable housing units will be located to the east of the site fronting Georgiana Street and St Pancras Way in a standalone block on first to fifth floors above the ground floor active uses. These units will be accessible by lift as well as stair and in line with LBC Policy includes a large 4-bed 6-person fully accessible wheelchair unit.
- 9.11 The mix of housing proposed will provide housing for a variety of household types ranging from 1-bedroom flats for couples through to larger 4-bedroom units to accommodate families or sharers, in line with local housing need.

Unit Size

Policy

9.12 At a regional level, previous London Housing Design Guide and Lifetime Homes guidance documents have been replaced by the London Plan Housing Supplementary Planning Guidance (March 2016) and the Housing Standards Minor Alterations to the London Plan (March 2016). According to the new guidance, the proposed residential layouts are required to meet the following space standards:

- The Technical Housing Standards (March 2015); and
- Building Regulations requirements M4(2) and M4(3).

9.13 At a local level, Camden Local Plan Policy H6 requires all homes to meet the nationally described space standards.

Assessment

9.14 The proposed residential units have been designed and planned to comply with the requirements set out within the London Housing Design Guide / National Technical Standards and Building Regulations.

9.15 All residential units accord with Building Regulations M4(2) for accessible and adaptable dwellings and benefit from a large floor-to-floor ceiling height of 2.8 metres and access to loggia (1.5 metres wide).

9.16 The minimum space standards set out at London Plan Policy 3.5 are comfortably met.

Amenity, Public Open Space and Landscaping

Policy

9.17 At a local level, Camden Local Plan Policy A2 Open Space seeks to protect and enhance access to open space and green infrastructure within the borough. Policy A2 (m) states that new development proposals within the London Borough of Camden will be required to apply a standard of 9 sqm per occupant for residential schemes

and 0.74 sqm for commercial developments while taking into account any funding for open spaces through the Community Infrastructure Levy.

- 9.18 Local Plan Policy A2 (n) states that priority will be given to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision.

Assessment

- 9.19 As set out above, by virtue of the number of dwellings, there would be a requirement for open space in respect of the residential element of the proposed development.
- 9.20 Residential users will have access to a significant area of new a public open space (670 sqm) which lies between the office building and market apartment housing block. Large new trees, high quality landscape materials, external planting, street furniture and play space elements will be provided as part of this. The public open space will significantly enhance the residential amenity offer and can be accessed from Georgiana Street, Royal College Street and St Pancras Way.
- 9.21 Each of the residential units proposed will have its own external private amenity space in the form of a balcony. The balconies proposed meet the requirements of the Mayor's Housing SPG in terms of size, including depth and width and total 511 sqm across both residential blocks. Therefore, the proposed private amenity space will be provided in accordance with regional and local planning policy.
- 9.22 Accordingly, the amenity space for the residential units is acceptable.

Aspect

Policy

- 9.23 Standard 28 in the Mayor's Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.

- 9.24 Standard 29 of the Mayor's Housing SPG requires dual aspect units wherever possible. In particular, the Housing SPG states that north facing single aspect units which are exposed to significant noise levels or which contain three plus bedrooms should be avoided.
- 9.25 Camden Local Plan, at paragraph 7.32, states that all residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, both new build and change of use, is dual aspect except in exceptional circumstances.

Assessment

- 9.26 During pre-application discussions and at the Design Review Panel meeting with LBC, it was suggested that there was potentially scope to re-design the residential buildings to eliminate single-aspect north-facing apartments. The design team explored several options to facilitate this, which were discussed with LBC, however, all solutions that eliminated single-aspect flats resulted in habitable rooms facing the office building and compromised the allocation of outdoor amenity space for residential occupiers. Therefore, an agreement was reached about the residential design, with 4 single aspect north facing apartments and 3 west facing single aspect apartments remaining, rather than losing valuable residential amenity space.

10 Design

- 10.1 This section reviews the proposals against relevant national, regional and local planning policy in term of design.

Policy

- 10.2 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.
- 10.3 At a national level the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Chapter 12).
- 10.4 Paragraph 124 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 10.5 Paragraph 127 of the NPPF states that development should function well and add to the overall quality of the area over the lifetime of the development. In pursuance of this development should be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness.
- 10.6 While achieving this development should optimise the potential use of the site including delivering an appropriate mix of green and public space. The application of policy should not discourage appropriate innovation or change. Design quality should be considered throughout the evolution and assessment of individual proposals.
- 10.7 The NPPF identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 185).

- 10.8 Paragraph 4 of the PPG on Design, states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. It states that planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).
- 10.9 Paragraph 15 of the PPG on Design states that that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:
- be functional;
 - support mixed uses and tenures;
 - include successful public spaces;
 - be adaptable and resilient;
 - have a distinctive character;
 - be attractive; and
 - encourage ease of movement.
- 10.10 At a regional level, London Plan Policy 7.1 requires good quality environments to be provided which have the best possible access to services, infrastructure and public transport. It states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 10.11 Policies 5.3 and 7.2 of the London Plan seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.
- 10.12 London Plan Policies 7.4, 7.5 and 7.6 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the

architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.

10.13 London Plan Policy 7.6 sets out a series of overarching design principles for development in London and advises that large scale buildings should be of the highest quality design, including [*inter alia*]:

- i. Optimise the potential of sites;
- ii. Promote high quality inclusive design;
- iii. Incorporate the best practice in resource management and climate change mitigation;
- iv. Comprise materials and details which complement local architectural character; and
- v. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.

10.14 At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use.

10.15 This policy reflects the London Plan design and principles and goes on to state that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- i. The character, setting, context and form and scale of neighbouring buildings;
- ii. The quality of materials to be used;
- iii. The provision of visually interesting frontages at street level;
- iv. The appropriate location for building services equipment;
- v. The provision of appropriate hard and soft landscaping; and

vi. The provision of appropriate amenity space.

10.16 Camden has also published a Planning Guidance SPD (March 2019) which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape. The key messages are to consider:

- i. The context of a development and its surrounding area;
- ii. The design of the building itself;
- iii. The use and function of the building;
- iv. Using good quality sustainable materials;
- v. Creating well connected public spaces and good quality public realm;
- vi. Opportunities for promoting health and wellbeing; and
- vii. Opportunities for improving the character and quality of an area.

Assessment

10.17 The first step for the design team was to assess the context of the site so that the scheme could develop sensitively to the locality. All four of the building's frontages present blank façades that fail to animate the surrounding streets. In addition to this, the existing buildings are unsightly and detract from the setting of the neighbouring locally listed public houses and fail to preserve or enhance the character or appearance of adjacent Regent's Canal Conservation Area.

10.18 The project architects, Caruso St John, have designed a high quality, coherent and legible mixed use scheme across three buildings to respect the character and appearance of the surrounding area and provide enhanced frontages to all four facing streets.

- 10.19 A detailed Design and Access Statement ('DAS'), prepared by Caruso St John, has been submitted to accompany this planning application. The DAS sets out in detail the key design matters which have been considered as part of the proposals.
- 10.20 The design of the proposals has been carefully considered throughout the pre-application stage and is the result of an iterative process with input from Camden design officers, and Camden's Design Review Panel.
- 10.21 The three buildings range in height between five, six and seven storeys and which are tallest to the south of the site. The proposals include setbacks at top three floors of the office building (alongside extensive planting), whilst the upper levels of the two residential buildings are reduced with sensitive plant enclosures at roof level. This lessens the buildings impact at street level and softens the buildings façades.
- 10.22 Overall, the scale and massing of the proposed development is considered to be appropriate in the context of the area, reflecting the similar building heights of the taller buildings along St Pancras Way and relating well to the immediate and wider townscape.
- 10.23 In terms of the materiality of the buildings and design of the facades, the team has ensured that high quality materials are proposed and that patterns used are similar to a number of nearby precedents.
- 10.24 The office building has a largely horizontal emphasis with relatively wide proportions comprising street façades characterised by strong repetitive arrangements of large windows. The apartment block buildings façades have a more vertical emphasis with a smaller scale window arrangement. The use of loggias mean that both the office and residential buildings have a material connection and form a coherent group.
- 10.25 The materiality of the proposed development is of a very high quality and would preserve and enhance the setting of the nearby Regent's Canal Conservation Area and the neighbouring locally listed public houses. In this context, the proposed development is sited and designed to respect its townscape and visual surroundings.

Conclusion

- 10.26 The site offers a significant development opportunity. The existing buildings, as described above and within the Design and Access Statement, are dated, unattractive and inefficient. The site is underutilised despite its strategic location between King's Cross and St Pancras and Camden Town. There is a significant opportunity for a well-designed and high quality mixed use development that would greatly improve the efficiency and utilisation of the site which is encouraged by planning policy at all levels.
- 10.27 As detailed above, a comprehensive Design and Access Statement is submitted with the application, which assesses the application proposals, provides detailed design justification and illustrates how the design has evolved during the life of the project and consultation with LBC.

11 Heritage, Townscape and Views

Statute and Policy

- 11.1 Section 66 of the 1990 Planning Act (Listed Buildings and Conservation Areas), states that decision makers are required to give considerable importance and weight to the desirability of preserving listed buildings, conservation areas and their settings.
- 11.2 Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 11.3 At a national level the Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset.
- 11.4 Under paragraph 189 of the NPPF in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. In undertaking this requirement, the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 11.5 Further to this, paragraph 190 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

- 11.6 Paragraph 192 states that in determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 11.7 NPPF paragraph 195 outlines that where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm.
- 11.8 Paragraph 196 of the NPPF states that where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm shall be weighed against the public benefits of the proposals.
- 11.9 Paragraph 197 of the NPPF states that when determining applications a balanced judgment should be made weighing the scale of any harm or loss against the significance of a non-designated heritage asset. Further to this paragraph 200 of states that local planning authorities should look for opportunities within the setting of heritage assets to enhance or better reveal their significance. In pursuance of this paragraph 202 advises that in determining proposals for enabling development local planning authorities should consider its potential to secure the future conservation of a heritage asset.
- 11.10 At a local level Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. In order to maintain the character of Camden's conservation areas the council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist development that would cause harm to significance of a listed building through an effect on its setting.

Assessment

- 11.11 The accompanying Townscape, Visual Impact and Heritage Assessment ('TVIHA'), prepared by Peter Stewart Consultancy, assesses the indirect effect of the application proposals on the settings of heritage assets in the surrounding area (within a 300m radius of the centre of the site). The assessment is in line with the national, regional, local and other adopted planning policy and guidance.
- 11.12 The proposed development will significantly enhance the townscape quality of the area. It is of a high quality of design and offers a number of urban design and townscape benefits including the intensification of accommodation on the site, the introduction of a mix of uses, better defined active street edges and public realm improvements.
- 11.13 The application proposals would preserve and enhance the setting of the nearby Regent's Canal Conservation Area and there would be no harm to the heritage significance of any other heritage asset near to the site.
- 11.14 Overall, the proposals have been designed to respect the physical fabric of the area including locally listed buildings and conservation areas; future approved development; the appropriateness of the site for the proposed development; and the character of the proposed design.

Views

- 11.15 The London View Management Framework (LVMF) 2012 provides guidance on the policies in the London Plan for the protection of strategically important views in London, and explains how 26 views designated by the Mayor and listed in the London Plan are to be managed. The site does not fall within any views with the LVMF.
- 11.16 A full analysis of key local and mid distance views has been undertaken as part of the pre-application process and the key views have been tested and reported within Peter Stewart Consultancy's accompanying THVIA.
- 11.17 The fourteen views assessed as part of the THVIA demonstrate that, where visible, the proposed development will appear as a beneficial element in the townscape and

enhance the views with an appropriately scaled urban development that positively addresses the street edges and the corners at the main junctions.

- 11.18 The proposed buildings will provide an enhanced built frontage to the principal street frontages of the site, with well-ordered elevations. The introduction of bays to the street facades with a vertical emphasis will enhance the townscape quality of these views.
- 11.19 The proposed development will appear above neighbouring buildings in some near views, but the appearance of the well-designed buildings will enhance these views.
- 11.20 It is considered that the scale of the development proposed and the central London built context are such that there will be a limited effect on longer distance views.

Conclusion

- 11.21 The surrounding environment has been carefully considered in the development of the proposals having regard to the relevant legislative framework.
- 11.22 In respect of heritage, townscape and viewpoint considerations, the proposals are in line with the relevant national tests and policies and guidance set out at national, regional and local levels.
- 11.23 In conclusion there would be no harm to the significance of any designated or non-designated heritage asset, and as such the need to balance any harm against the public benefits of the scheme under paragraphs 195 and 196 of the NPPF does not apply. Notwithstanding this, substantial public benefits do flow from the proposals as detailed throughout this Statement.

12 Energy and Sustainability

Policy

- 12.1 The NPPF sets out the Government's overarching planning policies regarding the delivery of sustainable development through the planning system. Chapter 14 of the document identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 12.2 At a national level paragraph 150 of the NPPF states that new development should avoid increased vulnerability to the range of impacts arising from climate change, help reduce greenhouse gas emissions. The NPPF states that in achieving this, the location, orientation and design of development should be considered.
- 12.3 Paragraph 154 of the NPPF states that when determining applications for renewable and low carbon development, local planning authorities should approve the application if its impacts are (or can be made) acceptable.
- 12.4 In accordance with National level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 12.5 Policy 5.2 requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
 - a. Be lean - use less energy;
 - b. Be clean - supply energy efficiently;
 - c. Be green - use renewable energy.
- 12.6 London Plan Policy 5.2 also requires, for both residential and non-residential development, a reduction in carbon emissions of 40% beyond 2010 Part L. The GLA

has subsequently published guidance confirming that this is broadly equivalent to a 35% reduction beyond 2013 Part L.

- 12.7 Policy 5.3 of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- 12.8 Policy 5.6 of the London Plan requires all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions.
- 12.9 London Plan Policy 5.7 outlines that the Mayor seeks to increase the proportion of energy generated from renewable sources, and all major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 12.10 The Mayor's Sustainable Design and Construction SPG (2014) advises that Developments should contribute to ensuring resilient energy infrastructure and a reliable energy supply, including from local low and zero carbon sources. It also sets out the following design measures for improving the sustainability of developments:
- optimise natural daylight;
 - optimise solar gain;
 - optimise insulation;
 - optimise air tightness;
 - optimise thermal mass;
 - Incorporate green infrastructure; and
 - Maximise potential for natural ventilation.
- 12.11 At a local level, through Local Plan Policy CC1 Camden requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during

construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan.

- 12.12 In support of these objectives Camden requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 12.13 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.
- 12.14 Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.
- 12.15 In March 2019 LBC updated the Camden Planning Guidance 'Energy Efficiency and Adaptation' to ensure that the Council's commitment to reducing carbon emissions is achieved. Moreover, Camden Planning Guidance 'Sustainability' (July 2015, updated March 2018) gives further guidance with respect to the principles of sustainability.

Assessment

- 12.16 The Applicant is committed to delivering a scheme with good environmental performance. The project team have worked to ensure that sustainability measures have been considered in detail. The proposed development, where possible, will be highly sustainable and energy efficient.
- 12.17 A Sustainability and Energy Statement has been prepared by Norman Disney Young, and has been submitted in support of this application.
- 12.18 The report contains the predicted energy and carbon emission of the proposed development and sets out the proposed low and zero carbon technologies to be incorporated into the scheme. It assesses how the proposals seek to accord with the policies and principles of sustainable development.
- 12.19 The proposed development has been modelled in the Energy Strategy using Government approved software to calculate the baseline carbon dioxide emissions.

The energy modelling is calculated using the Building Regulations methodologies to achieve an annual carbon emission saving of tonnes over the baseline scheme.

12.20 Specifically, the Sustainability and Energy Statement outlines how the proposed development will achieve approximately a 38.53% CO₂ reduction against Building Regulations 2013 for non-domestic areas (commercial uses) and in the domestic areas (residential uses) of the development it is anticipated that a 55.25% CO₂ reduction against Building Regulations 2013 will be achieved.

12.21 The Energy Strategy sets out that the proposed development meets and indeed exceeds the 2013 Building Regulations targets, by incorporating a combination of energy efficiency measures and low/zero carbon technologies.

These can be summarised below:

- Best practice building fabric properties beyond the standards set out in Building Regulations 2013;
- Provision of future connection to district networks;
- High efficiency mechanical ventilation with heat recovery;
- Energy efficient light fittings and controls;
- High efficiency air source heat pumps and electric heaters to provide heating, cooling and domestic hot water; and
- Installation of photovoltaic panels and solar thermal panels.

BREEAM

12.22 The Sustainability and Energy Statement demonstrates how under BREEAM pre-assessment the proposed development will achieve a BREEAM 'Excellent' result. The BREEAM pre-assessment also shows that a score of 74.38% is achievable. The full BREEAM pre-assessment results sheet has been included within the Sustainability and Energy Statement, submitted with this application.

Flooding, Drainage and SuDs

Policy

- 12.23 At a national level, paragraph 165 of the NPPF (2019) specifies that major developments should incorporate sustainable drainage systems, unless there is clear evidence that this would not be appropriate.
- 12.24 At a regional level, Policy 5.11 contained within the London Plan states that the proper consideration of flood risk is vital to ensuring that London is and continues to be a sustainable city.
- 12.25 At a local level, Camden Local Plan Policy CC2 advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- 12.26 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. To achieve this Camden will require development to:
- a) incorporate water efficiency measures; and
 - e) utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible.
- 12.27 Camden Planning Guidance 'Water and Flooding' (2019) states that the Council expects all developments, whether new or existing buildings, to be design to be water efficient by minimising water use and maximising the re-use of water.

Assessment

- 12.28 The site has been assessed and is considered to have a low probability of flooding.
- 12.29 AKT II have prepared a Flood Risk Assessment (including Drainage Strategy) to support this application.

- 12.30 As per the Flood Risk Assessment, it is proposed to implement a suitable sustainable drainage system on site, in order to reduce the peak surface water discharge from the proposed development, further reducing both the flood risk to the site and the surrounding area.
- 12.31 Rainwater is retained on the site through a combination of blue roofs, substantial tree pits and a large rainwater attenuation tank. These measures minimise peak outflow to the sewer.
- 12.32 There is also an opportunity to create rain gardens in the landscaped public open space and public realm areas. All will aid in reducing runoff across the site, improving attenuation, building performance and adding ecological value.

Conclusion

- 12.33 The proposed development will result in a highly efficient and sustainable scheme with significant improvements against the existing site and building regulations compliant baseline. All possible renewable and low carbon energy sources have been carefully considered.
- 12.34 The proposals are compliant with national, regional and local planning policies CC1 and CC2 regarding energy and sustainability, Policy CC3 regarding water and flooding and Camden Planning Guidance 'Energy Efficiency and Adaptation' and 'Water and Flooding'.

13 Amenity

- 13.1 This section of the Statement assesses the proposals against policy relating to the amenity of nearby existing residents in terms of air quality, noise and daylight and sunlight.

Air Quality

Policy

- 13.2 At a national level, NPPF paragraph 180 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development. In pursuance of this development proposals should mitigate and reduce to minimum potential adverse impacts in amenity
- 13.3 At a regional level, London Plan Policy 7.4 requires that development proposals should be “at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality.
- 13.4 London Plan Policy 7.14 seeks to reduce pollutant emissions and minimise public exposure to pollution. The Mayor will work with strategic partners to ensure that the policies of the London Plan support the implementation of Air Quality and Transport Strategies.
- 13.5 The GLA Housing SPG Standard 33 requires development to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMA)s).
- 13.6 At a local level, Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution

- 13.7 Camden Amenity Planning Guidance states that all of Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). As such all developments are to limit their impact on local air quality. An Air Quality Assessment is required to support any scheme which proposes uses susceptible to poor air quality, such as housing.
- 13.8 Camden Planning Guidance 'Air Quality' states that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality ('air quality positive').
- 13.9 The demolition and construction phases of development on air quality must be taken into account as part of planning applications. Mitigation and offsetting measures to deal with any negative air quality impacts associated with development must be implemented.
- 13.10 The London Borough of Camden has, since 2000, been designated an Air Quality Management Area. The Camden Air Quality Action Plan (2016) sets out a variety of actions to help reduce key air pollutants in the Borough arising from road traffic, gas boilers and other sources. Action 14 seeks to minimise emissions from the construction and operation of new developments by requiring developers to adhere to current and any superseding best practice guidance and supplementary planning guidance.

Assessment

- 13.11 The Air Quality Assessment, prepared by Air Quality Consultants, and which has been submitted with this application, has assessed the existing air quality conditions at, and in the vicinity of, the site; as well as the potential changes in air quality arising from the construction and operation of the proposed development. The document considers appropriate mitigation measures to ensure that any adverse effects on air quality are minimised.
- 13.12 During construction a series of mitigation measures to minimise dust emissions will be implemented and any residual effects are expected to be not significant.

13.13 The effects of local traffic and change in traffic flows as a result of the proposed development will have an insignificant impact on local air quality.

13.14 In summary, the proposed development will be air quality neutral with regards to both building and transport emissions. Therefore, the proposed development complies with national, regional and local policy for air quality.

Noise

Policy

13.15 At a national level, the NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of [*inter alia*] noise pollution.

13.16 Paragraph 123 of the NPPF states that planning decisions should aim to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development.

13.17 At a regional level, Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by:

- Minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals;
- Separate new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation; and
- Promoting new technologies and improved practices to reduce noise at source.

13.18 City Soundings: The Mayor's London Ambient Noise Strategy (2004) sets out the Mayor's guidance on how to minimise the adverse effects of noise on people living, working and visiting London. The Strategy aims to work towards a more compact city development while minimising noise. It states that careful consideration should be

taken of the adverse effect that noise can have on, from, within or in proximity to a development. This document is due to be superseded by the Draft London Environment Strategy late 2018.

- 13.19 At a local level, Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.
- 13.20 Camden Planning Guidance Document 6 'Amenity' supports Local Plan Policy A4, setting out when planning applications must be supported by noise reports and what mitigation measures can be implemented to prevent harm to amenity being caused.

Assessment

- 13.21 A Noise, Vibration and Ventilation Assessment ('NVVA') has been prepared by Hann Tucker Associates and accompanies the application. The NVVA presents the results of the survey that were carried out and assesses the implications against appropriate design standards and current planning guidance.
- 13.22 The NVVA has undertaken detailed daytime and night-time fully automated environmental noise surveys in order to establish the currently prevailing environmental noise climate around the site.
- 13.23 Noise level measurements were undertaken at four positions located at opposite extents of the development site. For each measurement, the noise climate and the measured noise levels were recorded and noted.
- 13.24 The locations were chosen to minimise the influence from building services plant serving the existing development and to best capture the most significant sources of noise likely to affect the proposed development. The background noise climate at the site is noted as being determined by road traffic on the surrounding streets with contributions from the adjacent UK Power Networks site.

- 13.25 The NVVA recommends plant noise emissions criteria and a preliminary plant noise emissions limit, as well as proposing suitable environmental noise intrusion criteria.
- 13.26 The NVVA concludes that acceptable internal noise level limits will be achieved with sound insulating façade measures including conventional and uprated double thermal glazing and via the implementation of the internal acoustic criteria proposed.

Daylight and Sunlight

Policy

- 13.27 Access to daylight and sunlight is important for general amenity, health and well-being, as well as bringing warmth into homes thereby reducing the energy consumption. As such it is crucial the development proposals include good levels of daylight and sunlight accessibility.
- 13.28 London Housing SPG Standard 32 advises that all homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.
- 13.29 Camden Local Plan Policy A1 seeks [*inter alia*] to protect daylight/sunlight values within existing and proposed development. The text at paragraph 6.5 supporting Policy A1 states that in assessing daylight/sunlight values Camden will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011).
- 13.30 The Building Research Establishment (BRE) document Site Layout Planning for Daylight and Sunlight (2011) sets out guidance for achieving good sunlight and daylight levels within buildings and the open spaces between them.
- 13.31 The BRE guidelines are not mandatory, though local planning authorities will consider the suitability of a proposed scheme for a site within the context of BRE guidance. Consideration will be given to the urban context within which a scheme is located.

13.32 In regard to daylight and sunlight Camden's Amenity CPG states that they will:

- Expect all buildings to receive adequate daylight and sunlight.
- Daylight and sunlight reports will be required where there is potential to reduce existing levels of daylight and sunlight.
- Base our considerations on the Average Daylight Factor and Vertical Sky Component.

Assessment

13.33 A Daylight and Sunlight Report assessing the development proposals insofar as it affects the daylight and sunlight amenity of the surrounding residential properties has been undertaken by Point 2 Surveyors. The report supporting the proposals, accompanies this application.

13.34 A number of detailed assessments have been undertaken on the surrounding buildings that have been identified as having habitable rooms/windows overlooking the site. This has been undertaken in accordance with the BRE report entitled 'Site layout planning for daylight and sunlight: A guide to good practice', more commonly known as 'The BRE Guidelines'.

13.35 The following surroundings properties contain residential accommodation and due to the proximity of the proposed development, have been assessed in terms of the effects of the proposed development upon their daylight and sunlight amenity:

- 118 Royal College Street;
- 40 St Pancras Way;
- 38 St Pancras Way;
- 124 Pratt Street; and
- 88 Royal College Street.

- 13.36 The analysis undertaken and set out within the report found that, owing partly to the site's current, relatively low height, many of the neighbouring properties have come to benefit from unusually high levels of daylight amenity for their urban location.
- 13.37 Whilst there are noticeable changes in daylight, the levels of daylight proposed to the surrounding residential buildings will be commensurate with an urban context, and certainly in the immediate vicinity to the site.
- 13.38 In terms of sunlight amenity, all surrounding living rooms retain BRE compliant levels of APSH. A small handful of bedrooms in Star Wharf retain marginally below the 25APSH target value, however this is considered acceptable given the less important nature of the room and urban setting of the site.
- 13.39 The Daylight and Sunlight Report therefore concludes that the development proposals are acceptable in terms of its effect on the access to Daylight and Sunlight amenity.

14 Transport and Servicing

Transport

Policy

- 14.1 At a national level, within the NPPF, the Government places great weight on the importance of delivering sustainable transport solutions to support new development so that the potential impacts of development on transport networks can be addressed, opportunities to promote walking, cycling and public transport use are identified and pursued, and the environmental impacts of traffic and transport can be minimised. In pursuance of these objectives paragraph 102 of the NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals.
- 14.2 Paragraph 103 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- 14.3 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Furthermore paragraph 104 states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
- 14.4 Further to this, paragraph 108 states that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 14.5 Paragraph 148 of the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 14.6 At a regional level, one of the strategic objectives of the London Plan is to improve accessibility, making London an easier city to move around and making public

transport and the pedestrian environment accessible to everyone. The Mayor's Transport Strategy sets out policies and proposals to achieve the goals set out in the Plan.

- 14.7 Policy 6.1 of the London Plan seeks to ensure the integration of transport and development by a number of strategic measures including:
- Encouraging patterns and forms of development that reduce the need to travel, especially by car;
 - Improving public transport capacity and accessibility, where it is needed, for areas of greatest demand and areas designated for development and regeneration; and
 - Supporting high trip generating development only at locations with high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development.
- 14.8 London Plan Policy 6.3 states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. The policy also indicates that transport assessments will be required in accordance with TfL's Transport Assessment Best Practice guidance for major planning applications
- 14.9 Specifically, both paragraph 111 in the NPPF and London Plan Policy 6.3 require applications for development proposals which could cause significant increases in movement to be accompanied by an assessment of the impact of the scheme on existing transport networks, as well as an assessment of how the scheme optimises sustainable methods of travel.
- 14.10 Policies 6.9 and 6.10 in the London Plan sets out the Mayor's steps for bringing forward a significant increase in cycling and walking in London. With respect to cycling, development should provide secure, integrated and accessible cycling facilities in line with the minimum standards set out in London Plan, as well as providing on-site changing facilities and showers for cyclists.
- 14.11 Policy 6.10 indicates that the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the

pedestrian environment, including the use of shared space principle promoting simplified streetscape, de-cluttering and access for all.

- 14.12 The Mayor's Transport Strategy (2010) sets out policies and proposals to achieve the goals set out in the London Plan providing a vision of London as an exemplary sustainable world city.

- 14.13 At a local level, Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.

- 14.14 Policy T1 promotes the prioritisation of walking in the borough and supports improvements to the pedestrian environment by supporting high quality public realm improvement works and the provision of high-quality safe road crossings where needed and seating.

- 14.15 Policy T1 (g) states that Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within Camden's Transport CPG.

- 14.16 Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.

- 14.17 To assess the overall implications of developments LBC, under policy T4, expects the submission of a Transport Assessment, Delivery and Servicing Management Plan and Construction Management Plan where the implications of proposals are significant.

- 14.18 On 15 March 2019 Camden adopted the 'Transport' CPG which provides information on all types of detailed transport issues within the borough including assessing transport impact, travel plans, delivery and servicing plans and cycling facilities.

Assessment

- 14.19 The site is very accessible by a number of modes of transport, with a good network of cycle facilities and public transport services nearby. The site is located circa 300 metres south east (5 minutes' walk) of Camden Town Overground Station and 400m east (6 minutes' walk) of Camden Town Underground Station and has good accessibility to several nearby bus routes. Direct access to the site is also provided by Pratt Street which benefits from dedicated cycle lanes in both directions.
- 14.20 The site benefits from a PTAL rating of 6a, which demonstrates it has very good access to public transport services and thereby maximising the opportunities for sustainable transport modes to be used.
- 14.21 A Transport Assessment, Travel Plan and Delivery and Servicing Management Plan, prepared by Urban Flow, has been submitted in support of this application. The Transport Assessment ('TA') assesses the likely transport implications arising from the proposed development and sets out the proposed parking, access and servicing arrangements. For the purposes of their assessment, the TA reviews the proposals on the basis of a reasonable 'worst case' scenario.
- 14.22 The scheme will be car-free development. The proposals will retain the existing three pay by phone parking bays and one motorcycle bay on St Pancras Way and seek to provide three new disabled parking bays (two on Georgiana Street and one on Pratt Street). In terms of car parking provision, the development proposals accord with the objectives of London Plan Policy 6.2 and Camden Local Plan Policy T2.
- 14.23 The development proposals will provide 288 long-stay cycle parking spaces for all land uses at the development site and are in accordance with new London Plan minimum standards. Long-stay cycle parking will be provided in secure and sheltered areas at basement level with separate stores for the office, residential affordable block and residential market block. It is assumed that the long-stay cycle space provision for the Class B1c/B8 uses can be accommodated within either the office store and/or flexibly within the industrial units. The office cycle store is accessed from Pratt Street through a lift core or a staircase with a suitable cycle channel, whilst access to the residential cycle stores are direct from Georgiana Street.

14.24 The proposed short-stay cycle parking will provide 57 cycle spaces. These will be located both on and off the street in three locations across the proposed development. The short stay cycle parking has been spread across the proposed development, in order to prevent any negative impacts of excessive short-stay cycle parking provision within a single area, such as the newly created public open space between the buildings. The short-stay cycle parking provision will accord with the standards required by London Plan Table 6.3 and Policy T1 within the Camden Local Plan.

14.25 The development proposals include several alterations to the highway infrastructure within the site, these are listed below:

- A new internal servicing street accessed via Pratt Street and exited from St Pancras Way will be provided;
- Three disabled parking bays will be located on-street; two from Georgiana Street; and one from Pratt Street; and
- Some short-stay cycle parking bays will be provided to the north of the site on the footway of Georgiana Street where there is sufficient pavement space for pedestrians to pass.

14.26 The short-stay parking and alterations to the highway infrastructure will be secured by planning condition or Section 106 obligation and delivered pursuant to a Section 278 Agreement.

14.27 The development proposals include a number of public realm improvements that will improve connectivity through the site and across the surrounding area. These are as follows:

- A new east-west aligned publicly accessible route will be created through the site that will provide improved pedestrian connectivity;
- Increased site permeability with accesses from Royal College Street, Georgiana Street, St Pancras Way and Pratt Street - in contrast to the single existing access; and
- A proposed public open space and landscaping strategy which encourages safe pedestrian movement through and within the development.

- 14.28 The proposed enhancements will improve access to the site and across the area, so to improving the pedestrian experience. The proposals accord with the objectives set out in London Plan Policy 6.09 and 6.10 and Camden Local Plan Policy T1 by placing an impetus on walking and cycling and promoting the use of sustainable modes of transport.

Trip Generation

- 14.29 In order to determine the net effect of the development proposals the number of trips forecast to be generated as a result of the proposed development has been compared with the operation of the existing site. These have been split by use class below.
- Office use: around 310 two-way trips are forecast during the AM peak and 311 two-way trips are forecast during the PM peak, totalling around 2100 two-way trips throughout the day. The majority of trips by employees during peak hours are undertaken on public transport services.
 - Industrial use: It is considered that there would be approximately 87 two-way during the AM peak and 43 two-way during the PM peak, comprising a total two-way trip generation of around 800 trips across the day. Overall it is assumed that approximately half of all trips generated by the industrial uses will be by vehicles.
 - Residential use: it could be expected that approximately 15 two-way trips are forecast during the AM peak and 9 two-way trips are forecast during the PM peak. In total it is assumed that there could be a total trip generation of up to 112. As with the office use, most of the residential trips during peak hours are assumed to be undertaken on public transport services, or by walking and cycling.
 - Retail use: When combining trip generation for non-food, food and café retail uses, this gives an overall total trip generation for the proposed flexible A1/A3 retail uses at the site. It is considered that when combined, an assumption of around 187 two-way trips are forecast during the AM peak and 388 two-way trips are forecast during the PM peak, totalling

around 3800 two-way trips throughout the day. Most of these trips would be assumed to be undertaken by walking or cycling.

- 14.30 It is estimated that there will be a net reduction in vehicle trip making, equivalent to approximately 240 trips per day.
- 14.31 The existing all-day total trip generation is around 400 two-way trips per day. Overall, the assessment of trip generation found that the proposed development, would give an assumed average for AM and PM peak hour flows of approximately 400 trips per hour, with a total of around 1400 two-way trips throughout the day. This equates to an increase of approximately 1,000 trips per day, equivalent to an average of 65 trips per hour or approximately an extra inbound/outbound trip every minute.
- 14.32 The assessment of the multi-modal trip generation of the proposed development has identified that the vast majority will be undertaken by active and sustainable transport modes. The net change in trip generation will be minor, and when considered against the wide range of public transport services available near to the site, will not result in a material impact on the public transport network. In addition, visitors to the proposed flexible retail A1/A3 units will predominantly be derived from workers and shoppers already in the area or those seeking to enjoy the new public open space and associated public realm improvements and will not therefore be new trips.

Delivery, Servicing and Waste Management

- 14.33 Following extensive design development, the proposed arrangement for servicing is for goods vehicles to enter via Pratt Street and exit via St Pancras Way through an internal servicing road underneath the main commercial building. This will provide sufficient operational capacity within the site to accommodate anticipated goods vehicle activity.
- 14.34 The Delivery and Servicing Plan ('DSP') proposes three key management measures, as follows:
- Spread servicing demand throughout the day;
 - Manage number of vehicles in the servicing street; and

- Ensure rapid turnover of spaces.

14.35 A comprehensive Delivery Booking System ('DBS') is proposed to be implemented to manage the bays on the internal servicing road. The maximum inbound flow of vehicles will be 9 vehicles, with a maximum average stay of between 25-30 minutes per vehicle.

Conclusion

14.36 The proposed development is considered to meet the objectives of current national, regional and local policy for a number of reasons, including:

- The proposed development supports NPPF's objectives, to promote more sustainable transport choices and to promote accessibility to jobs and services; thereby reducing the need to travel;
- The site has excellent accessibility to public transport, with many local bus, main line rail and Underground services available within a short walking distance from the site. This fulfils a number of policy objectives;
- Secure cycle parking and associated facilities for cyclists will be provided thus achieving a number of cycling standard at regional and local level; and
- The proposal only includes the provision of accessible on-street car parking.

14.37 An assessment of the effects of the proposed development on the local transport network has concluded that it will not result in a material impact on the network. As outlined, the majority of the trips will be undertaken by sustainable modes (public transport and active modes), with very few private vehicle trips.

14.38 The proposals have been shown to comply with national, regional and local transport planning policy.

14.39 The Transport, Delivery and Servicing arrangements are covered in further detail within the Transport Assessment, Travel Plan and Delivery and Servicing Management Plan (and their associated appendices), prepared by Urban Flow, which accompany this application.

Construction Traffic Management

Policy

- 14.40 Local Plan Policy T4 seeks to minimise the impact of the movement of goods and materials by road.
- 14.41 Moreover, Paragraphs 10.34 and 10.35 set out the roads that heavy goods are expected to be transported along and suggests that the impact of goods vehicles can be reduced where a loading and unloading bay is included within a development.

Assessment

- 14.42 The supporting draft Construction Environmental Management Plan ('CEMP'), prepared by Blackburn & Co, and submitted with this application follows the LBC's pro forma.
- 14.43 The intention of the supporting bespoke CEMP is to help minimise construction impacts and relates to both on site activity and the transport arrangements for vehicles servicing the site.
- 14.44 The overall construction strategy is not known at this stage and is dependent upon how the appointed principal contractor intends to undertake the construction activities at the site. Once appointed, the principal contractor will be required to amend this CEMP with the details of the construction activities.
- 14.45 A final CEMP will be prepared for submission to and approval by Camden, subject to planning permission being granted. The proposed development will therefore be conducted in a manner that accords with local planning policy requirements.

15 Other Considerations

Basements

Policy

- 15.1 Camden Local Plan Policy states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
- a. neighbouring properties;
 - b. the structural, ground, or water conditions of the area;
 - c. the character and amenity of the area;
 - d. the architectural character of the building; and
 - e. the significance of heritage assets.
- 15.2 Camden Basements CPG gives detailed guidance with respect to new basement development, specifically their siting, location, scale and design.
- 15.3 The CPG advises that the Council strongly encourages applicants to use the Council's Basement Impact Assessment ('BIA') proforma to ensure that all aspects of potential impact are addressed, a BIA of which is included as part of this application.

Assessment

- 15.4 All three buildings will be interconnected with a shared basement which is proposed to occupy the majority of the site boundary.
- 15.5 A Basement Impact Assessment ('BIA'), prepared by AKT II, has been prepared in support of this application and gives an overview of the substructure and the basement considerations in the context of the proposed development.

- 15.6 The BIA briefly assesses the impact of the proposed basement works and outlines the works required in order to secure the necessary third party approvals prior to commencing works on site.

Archaeology

Policy

- 15.7 Camden Local Plan Policy D2 states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Assessment

- 15.8 An Archaeological Assessment ('AA'), prepared by Archaeology Collective, has been submitted in support of this application. The AA concluded that no world heritage sites or monuments would be contained within the site.

Land Contamination

Policy

- 15.9 Policy A1 of the Camden Local Plan stipulates that the Council will seek to protect the quality of life of occupiers and neighbours. The factors the Council will consider include [*inter alia*] contaminated land.

Assessment

- 15.10 A Contaminated Land Assessment ('CLA'), prepared by Soiltechnics has been undertaken and submitted with this application. The CLA found that there were no elevated concentrations of contaminants identified within the Made Ground, although a fragment of asbestos containing material was found within a sample.
- 15.11 The CLA recommends potential measures as part of an extensive remediation strategy that could be employed and that further investigation, sampling and testing

of Made Ground soils, including for asbestos could be undertaken in order to refine the waste classification of the soils.

Trees

Policy

15.12 Camden Local Plan Policy A3 states that the Council will protect, and seek to secure additional, trees and vegetation. Specifically, Policy A3 stipulates that the Council will [*inter alia*]:

l. 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;

m. expect developments to incorporate additional trees and vegetation wherever possible.

15.13 Camden Planning Guidance on Trees outlines that [*inter alia*] using British Standard BS5837:2012 the Council will aim to increase and improve tree coverage in the design of new developments and through planning contributions.

Assessment

15.14 There are a number of trees at the site, which although outside the site ownership boundary, are proposed to be removed due to basement construction works and site layout changes.

15.15 The retention of the existing trees is considered unrealistic and the provision of the same number of trees post-construction of species with a greater diversity, ecological benefit, and ultimately an increase in canopy cover at maturity will offer a significant uplift in ecological value for the site.

15.16 An Ecology Report, Arboricultural Impact Assessment, Tree Survey, Landscape Section of the Design and Access Statement and Tree Strategy Statement all

submitted in support of this application outline further details of the existing and proposed tree provision and the wider tree strategy proposed at the site.

16 Planning Obligations

- 16.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 16.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 204 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
 - b) Directly related to the proposed development; and
 - c) Fairly and reasonably related in scale and kind to the proposed development.
- 16.3 Paragraph 54 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 16.4 Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (Paragraph 55 NPPF).
- 16.5 Under Policy 8.2 of the LP 'Planning Obligations', boroughs should include appropriate strategic as well as local needs in their policies for planning obligations.
- 16.6 Policy 8.2 states that negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area.
- 16.7 As set out in Camden Planning Guidance 'Developer Contributions', the use of planning obligations is an important tool in managing the impacts of development and assisting the delivery of necessary infrastructure to support Camden's and London's current and future needs to meet the strategic objectives of the Local Plan.

- 16.8 The use of planning obligations is specifically required through Local Plan policy DM1 'delivering and monitoring' although a whole range of individual development policies may be used to justify an obligation.
- 16.9 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.
- 16.10 The Applicant will enter into a legal agreement with the Council to secure the reasonable and necessary planning obligations associated with the Proposed Development in accordance with Regulation 122 of the CIL Regulations, Camden's Local Plan Policies C2 and DM1 and Camden's Planning Obligations SPG.
- 16.11 The final content and scope of planning obligations will be negotiated through the planning application process. However, it is anticipated that the S106 will provide for the following:
- Affordable housing;
 - Highways contribution for any necessary highway works;
 - Car free;
 - Construction management plan and implementation support contribution;
 - Energy Efficiency and Renewable Energy Plan;
 - Employment and training contribution;
 - Local procurement and associated fee;
 - Service management plan;
 - Sustainability/Energy Statement; and
 - Travel plan and monitoring cost.

Community Infrastructure Levy (CIL)

- 16.12 LBC adopted its Community Infrastructure Levy in April 2015.
- 16.13 The site is located within CIL Charging Zone B (Rest of Camden). Therefore, the development will be liable to pay the following:

- Residential (Class C3) (10 or more dwellings or above 1000sqm) - £250 per square metre
- Office (Class B1(a)) - £25 per square metre
- Retail (Class A1-A5) - £25 per square metre

16.14 MCIL2 came into effect on 1 April 2019.

16.15 MCIL2 is charged at £80 per square metre in Camden.

16.16 A completed CIL form has been submitted with this application.

17 Summary and Conclusions

- 17.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 17.2 This Statement has assessed the proposals against the development plan, relevant statute and other relevant planning policy and guidance at national, regional and local policy level.
- 17.3 The proposed development has been subject to thorough pre-application discussions with local residents, businesses, Camden Officers and other interested third parties. The applicant has sought at all times to consider and where possible incorporate responses received.
- 17.4 The Applicant has instructed Caruso St John architects to design a scheme at St Pancras Commercial Centre comprising the demolition and redevelopment of the existing buildings to provide a sustainable mix of uses incorporating the intensification of existing employment uses and provision of high quality flexible office accommodation, retail floorspace and 33 on-site self-contained homes (including 14 affordable units), within a highly accessible and strategic location, and with regard to national, regional and local planning policy.
- 17.5 The existing unattractive, poor quality and inefficient buildings on site will be redeveloped and the proposals present an exciting opportunity to realise the development potential of this significantly underutilised site and to regenerate this important part of Camden which is relatively undefined. At a regional level, the London Plan prioritises development in locations which are well served by public transport. The proposed development has very good public transport links being in the proximity of Camden Town Overground and Underground Stations.
- 17.6 The proposed development would be to the highest architectural quality and deliver an efficient fit-for-purpose modern mixed use scheme that could provide up to 1,200 new jobs and help to meet market demand.

- 17.7 The site has the potential to intensify the existing employment uses, accommodate a considerable amount of new office floorspace, provide flexible retail floorspace and provide much needed housing to the Borough (including affordable homes).
- 17.8 The proposed development helps to achieve the objectives of the Camden Local Plan through the following:
- Re-providing and intensifying the existing industrial employment uses at the site;
 - Creating a sustainable development which provides flexible office accommodation to meet a range of occupier requirements;
 - Providing 33 homes including 14 much needed affordable homes with good residential amenity;
 - Providing active street frontages and enhancing the vitality and competitiveness of this part of Camden;
 - Providing a car free development which encourages use of public transport, in this accessible location, but also walking and cycling, enabling people to lead active and healthy lives; and
 - Creating a safe and secure environment for existing and future residents and workers.
- 17.9 The proposed development will create a distinctive place, appropriate for its location between King's Cross and St Pancras and Camden Town, and will deliver a series of public realm improvements and enhancements, whilst seeking to reduce the anti-social behaviour within the area.
- 17.10 The proposed development will make a significant contribution to both Camden and to London by improving pedestrian links north-south through Camden but also by offering a number of key priority land uses, including affordable homes. The provision of active uses at ground floor level will improve the street environment both for those living, working and visiting and will offer a more attractive place to spend time, as well as making the place more legible, safer and visually attractive.
- 17.11 The proposal demonstrates that it satisfies statute and satisfies and exceeds planning policies at national, regional and local levels.

- 17.12 The application accords with national, regional and local policy objectives to deliver sustainable, mixed use and balanced communities and should therefore be approved.