

# GREATER LONDON AUTHORITY

**Kate Henry**  
Regeneration and Planning  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

**Our ref:** GLA/5097/01  
**Your ref:** 2019/4201/P  
**Date:** 14 October 2019

Dear Ms Henry,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.**

**St Pancras Commercial Centre**

**Local planning authority reference: 2019/4201/P**

I refer to the copy of the above planning application, which was received on 27 August 2019. On 14 October 2019 the Mayor considered a report on this proposal, reference GLA/5097/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 78 of the above report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Gavin McLaughlin (020 3054 7027).

Yours sincerely,



**John Finlayson**  
Head of Development Management

cc Andrew Dismore, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL  
Alex Neal, Gerald Eve LLP, 72 Welbeck Street, London W1G 0AY

14 October 2019

**St Pancras Commercial Centre**

in the London Borough of Camden

planning application nos. 2019/4201/P

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

**The proposal**

Redevelopment of the site to provide 3 buildings ranging in height up to 7 storeys and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33 residential units, and flexible retail floorspace (Class A1/A3).

**The applicant**

The applicant is **Camden Property Holdings Limited**, and the architect is **Caruso St John Architects**.

**Strategic issues**

**Principle of development:** The redevelopment of an underutilised, non designated industrial site to provide a high density, commercial led mixed use development is accepted in principle. The proposed light industrial units are generally fit for purpose. However, the suitability of the ground floor unit in the residential building for industrial uses is questioned and the mezzanine floors should be removed. The applicant should demonstrate that the proposed industrial uses would not be subject to unreasonable restrictions which might impact negatively on their operation through appropriate mitigation to protect residential quality and amenity. The provision of affordable and flexible workspace, including smaller units for SMEs, would also need to be addressed. (paragraphs 16-24)

**Affordable housing:** As the scheme would involve a net loss in industrial floorspace capacity, the threshold for meeting the Fast Track Route is 50%. The affordable housing offer is 50% with a 73:27 split between LAR and Camden Intermediate Rent which both qualify as genuinely affordable housing products. This offer is therefore fully supported subject to securing the intermediate rent levels identified. The Council should seek to secure an early stage review within the s106 agreement (paragraphs 26-32)

**Transport:** The following key issues would need to be addressed: further discussion with TfL on the Road Safety Audit for the proposed servicing egress; the accessibility of the bus stops on Royal College Street; detailed design of all cycle parking to meet LCDS; a Parking Design and Management Plan and TfL CLP to be secured by condition; improvements made to disabled/cycling access onto Regents Canal; the Trip Generation needs updating. (paragraphs 54-74)

Outstanding issues relating to **urban design** (paragraphs 33-38), **inclusive design** (paragraph 45-47), **energy** (paragraph 48), **drainage** (paragraphs 49-51), **urban greening** (paragraph 52) and **noise and vibration** (paragraph 53) would also need to be addressed.

**Recommendation**

That Camden Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 78 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

## Context

1 On 27 August 2019, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide Camden Council with a statement setting out whether he considers that the application complies with the London plan and the reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1B and 1C of the Schedule to the 2008 Order:

- 1B – *“Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings – c) outside Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C – *“Development which comprises or includes the erection of a building of one or more of the following descriptions – c) the building is more than 30 metres high and is outside of the City of London”*

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow Camden Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The site is approximately 0.5 hectares in size and currently comprises two, two storey linear development blocks separated by a private access road with parking and loading areas on either side. The two blocks accommodate warehousing and light industrial units (Class B1c/B8) with ancillary offices at upper level. The site is accessed from Pratt Street to the south.

6 The site is bounded by Georgiana Street to the north, St Pancras Way to the east, Pratt Street to the south and Royal College Street to the west. The site is not within a conservation area; however, Regents Canal Conservation Area lies immediately to the north and east of the site, Kings Cross and St Pancras Conservation Area lies to the south of the site and Camden Town Conservation Area lies further over the west.

7 There are also a number of Grade II listed buildings in the vicinity of the site including 165-181 Royal College Street, buildings on either side of Georgiana Street to the west, a number of buildings on Lyme Street, and 82-90 Pratt Street. All Saints Greek Orthodox Church on Camden Street to the west is Grade I listed. In addition, there are a number of locally listed terraces on Royal College Street, Pratt Street and Camden Street.

8 The surrounding area is likely to subject to significant change, with the Parcel Force site to the south, EDF substation site to the west and Bangor Wharf to the north all allocated for mixed use redevelopment in Camden Council's Site Allocations Plan.

9 The site has a PTAL of 6a on a scale of 0 to 6b. It is approximately 500 metres east of Camden Town station and 1.5 kilometres north-west of St Pancras / King's Cross station. Camden Road station is approximately 250 metres north, served by London Overground.

## Details of the proposal

10 The proposals are for the redevelopment of the site to provide a 33 residential units, a 7 storey office building (16,345 sq.m.) with light industrial units provided at ground floor and basement level to the south of the site (3,297 sq.m.) and two retail units (765 sq.m.) provided at ground floor on Georgiana Street. The light industrial 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. Two residential buildings are proposed to the north of the site which are 5 and 6 storeys in height and separated from the office building by an area of hard landscaping. Retail and light industrial uses are provided at the ground floor of the residential buildings.

11 Since the application was submitted, revised drawings have been submitted which seek to amend the housing mix slightly (resulting in the provision of one additional market unit) and other minor external alterations. This report reflects these amendments.

## Case history

12 A pre-application meeting was held with the GLA on 13 May 2019. Meeting discussions covered strategic issues with respect to employment, housing, urban design, inclusive access, sustainable development and transport. A formal pre-application note was issued to the applicant on 3 September 2019.

## Strategic planning issues and relevant policies and guidance

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Camden Council's Local Plan (2017), Site Allocations Plan (2013) and the 2016 London Plan (Consolidated with Alterations).

14 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- The draft London Plan - Consolidated Suggested Changes (July 2019) which should be taken into account on the basis explained in the NPPF.

15 The relevant issues and corresponding policies are as follows:

- Industrial land *London Plan; Land for Industry and Transport SPG; Industrial Intensification Primer;*
- Housing *London Plan; Housing SPG; Affordable Housing & Viability SPG (which should be read subject to the decision in R(McCarthy & Stone) v. Mayor of London); Mayor's Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Urban design and heritage *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Energy and drainage *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy; Crossrail SPG.*

## Principle of development

16 The existing site accommodates circa 3,200 sq.m. of light industrial/ warehousing (Class B1c/B8) with ancillary offices but is not a designated industrial site (NDIS) London Plan Policy 4.4 and draft London Plan Policy E4 seek to retain a sufficient stock of industrial land and premises to meet the future needs of industrial and related uses in different parts of London, including for good quality and affordable space and that any release of industrial land in order to manage issues of long term vacancy and achieve wider planning objectives having regard to borough level classifications for release. The London Borough of Camden (LBC) is identified for 'restricted' release of industrial land to other uses in the London Plan. However, due to significant losses in industrial land across London to alternative uses beyond London Plan quotas, the classifications have been revised accordingly. In this regard, LBC has been reclassified to 'retain' its existing stock of industrial land in the draft London Plan.

17 Draft London Plan Policy E7 states that mixed use or residential development proposals on NDIS should be supported where there is no reasonable prospect of the site being used for the industrial and related purposes; or it has been allocated in an adopted local development plan document for residential or mixed use development; or industrial, storage or distribution floorspace is provided as part of mixed use intensification. In this regard, the proposals involve the provision of 3,297 sq.m. of light industrial (Class B1c) floorspace on site. On this basis, the mixed-use redevelopment of the site is acceptable in principle subject to the matters raised in below being satisfactorily resolved. The re-provided industrial uses must also be completed prior to occupation of the residential element of the scheme. This should be secured within the s106 agreement.

18 In accordance with draft London Plan Policy E2, B Use Class business space must be fit for purpose having regard to the type and use of the space. In this regard, the proposed light industrial units have in the most part been provided with generous floor to ceiling heights which can accommodate increased floor loadings. They are each provided with 4 metre loading bays which are accessed via a dedicated access road through the site, which is also welcomed. However, the proposed mezzanine floors would fall short of the minimum floor to ceiling heights recommended for their use at 2.5-3 metres (the minimum would requirement for light industrial use would be 3.5 metres). The mezzanines should therefore be removed to maximise the usability of this space. Furthermore, the 345 sq.m. attributed to mezzanine floorspace which should be excluded from calculations of industrial floorspace capacity under paragraph 6.4.5B of the draft London Plan. Excluding the mezzanines would reduce the proposed light industrial floorspace to 2,952 sq.m, as such the scheme would result in a net loss in industrial floorspace capacity. This is discussed further in the affordable housing section of this report.

19 The proposed light industrial units would be provided over part of the ground and basement of the proposed office building and at the ground floor of the affordable housing block. In schemes involving the co-location of industrial and residential, applicants must demonstrate that appropriate design mitigation is proposed in any residential element to ensure that the proposed industrial uses, and those on surrounding sites, are not subject to unreasonable restrictions which might impact negatively on their operation in accordance with Policy E7 Part E. This includes consideration of safety and security; site layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict; design quality, public realm, visual impact and amenity for residents; agent of change principles; noise and vibration; air quality, including dust, odour and emissions and potential contamination.

20 These matters, with the exception of servicing and delivery arrangements, have not been explicitly addressed within the Design and Access Statement or elsewhere in the application submission. A comprehensive design and/or technical response should therefore be provided and amendments made to the scheme as necessary.

21 The suitability of the ground floor unit within the affordable housing block for light industrial use in particular is questioned. There is potential for noise and vibration associated with its operation to impact negatively on residential amenity, particularly on the residential units directly above. This is discussed in more detail in the noise and vibration section of the note. The layout is also somewhat compromised by the location of the stair/lift core in the middle of the unit. Changing the use of this ground floor unit from industrial to an alternative use would result in a further reduction in industrial floorspace of 167 sq.m., equating to an overall industrial floorspace provision of 2,785 sq.m. (not including the associated lower ground floor level).

### Offices

22 London Plan Policy 4.2 supports increases in the current office stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities. Furthermore, Policy E1 of the draft London Plan states that improvements to the quality flexibility and adaptability of office space of different sizes should be supported by new office provision, refurbishment and mixed use development. Increases in stock should be consolidated and extended focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity. In this regard, the site is between the Kings Cross and Euston Growth Areas, where office growth outside the Central London Area (LBC defined) is to be focused. Although the site is not within a town centre, it is in relative proximity to Camden Town Centre and it also benefits from good public transport connectivity. Therefore, the principle of office development is accepted.

### Affordable workspace

23 London Plan Policy 2.7 and London Plan Policies E1, E2 and E3 support the provision of affordable workspace in particular instances in response to local need. Furthermore, schemes involving the creation of more than 2,500 sq.m. of B1 offices should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises. Similarly, LBC Local Plan Policy E2 encourages the provision of affordable and SME workspace in such schemes, where viable. The removal of the mezzanines would improve the flexibility of the industrial units and the office floorplates have been designed to maximise plan form flexibility, which is welcomed. However, the submission does not seek to address the matter of workspace affordability. The applicant should make an appropriate offer with regards to the provision of affordable workspace which should be robustly secured within the s106 agreement.

### Retail

24 The London Plan Policy 4.7 and draft London Plan Policy SD7 take a town centre first approach in directing the development of new retail uses. Although the site is not within a designated town centre or local shopping parade, the retail units proposed are relatively small and therefore unlikely to have a detrimental impact on the vitality or viability of the nearby Camden Town Centre. Furthermore, there is a lack of retail uses in an area which is predominantly residential; therefore, the local area is likely to benefit from the provision new retail and is accepted on this basis.

## Housing

25 The scheme proposes to provide 33 units with the following mix:

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>Total units</b>	<b>Total hab rooms</b>	<b>% by hab room</b>
<b>Market</b>	7	11	1	0	19	52	50%
<b>Intermediate rent</b>	4	2	0	0	6	14	50%
<b>Affordable rent</b>	0	2	5	1	8	37	
<b>Totals</b>	11	15	6	1	33	103	

### Affordable housing

26 London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing. The Mayor's Affordable Housing and Viability SPG establishes a minimum pan-London threshold level of 35% affordable housing with a strategic target of 50%. LBC Council's Local Plan Policy H4 sets an affordable housing target of 50% and would seek to negotiate the maximum reasonable amount of affordable housing including the provision of a 60:40 split between affordable/social rent and intermediate tenures.

27 In accordance with draft London Plan Policy H6, the threshold for meeting the Fast Track Route is 35% affordable housing by habitable room (without grant) whereby such schemes would not be subject to viability review. However, for schemes are brought forward on industrial land, the Fast Track Route is 50% unless the development seeks to replace the existing industrial floorspace capacity on site or 65% of the plot ratio, whichever is greater.

28 In this regard, as discussed above, the scheme would involve a net loss in industrial floorspace capacity. As such, the Fast Track Route threshold would be 50% affordable housing by habitable room.

29 Policy H7 of the draft London Plan and Affordable Housing Viability SPG sets out a preferred tenure split of at least 30% low cost rent (social or affordable rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the LPA to achieve mixed and balanced communities. For any affordable housing provided beyond 35%, their tenure is flexible provided that they are genuinely affordable and take account of local housing need in accordance with draft London Plan Policy H7.

30 The affordable housing offer is 50% by habitable room with a 73:27 split between London Affordable Rent and LBC Intermediate Rent products. The indicative intermediate rent levels are detailed within the applicant's Affordable Housing Statement and are based on rents



that are no more than 40% of net income including service charges as set out in the table below. The income level assumptions are £30,000 per annum for 1 bed and £40,000 per annum for 2 beds. The rent levels must be confirmed as genuinely affordable and robustly secured as such within the s106 agreement.

<b>Monthly rental levels</b>	<b>Market (based on the London Rent Map)</b>	<b>LLR</b>	<b>Proposed (based on Camden Intermediate Rent)</b>
1 bed	£1,603	£1,017	£715 (circa 45% of market rent)
2 bed	£2,080	£1,130	£932 (circa 45% of market rent)

31 In terms of tenure split, the offer complies with draft London Plan Policy H7 and LBC Council officers have also deemed the tenure split to be acceptable. As such, subject to securing the intermediate rent levels set out within the Affordable Housing Statement, the scheme would qualify for the Fast Track Route and would not be subject to late stage viability review.

32 An early implementation review would need to be secured within the s106 agreement in accordance with the Affordable Housing and Viability SPG and draft London Plan.

## **Urban design**

33 The design principles in Chapter 7 of the London Plan and Chapter 3 of the draft London Plan require all developments to achieve a high standard of design which responds to local character, enhances the public realm and includes architecture of the highest quality that defines the area and makes a positive contribution to the streetscape and cityscape.

### Layout height and massing

34 The layout and massing of the scheme is in keeping with proposals submitted during pre-application stage and is supported. A larger office and light industrial building is located to the south of the site and two smaller residential blocks that step down in height are proposed at the northern end of the site, which responds to the scale of buildings along Georgiana Street. The distribution of height is supported and sits comfortably within the context of existing and emerging development.

35 Reflecting the structure of the building in its facade is welcomed. However, the applicant is encouraged to consider a more contemporary and simplified approach to the facade treatment. This could be achieved by reducing the prominence of the concrete capitals that coincide with internal floor levels or by expressing this architectural element in subtler ways.

### Public realm and street level condition

36 The proposed development achieves a good level of active frontages at street level. The blocks are arranged around a new public space that also serves as a service route for light

industrial uses along its eastern perimeter. The applicant has introduced planting in raised planter beds to create physical and visual separation between pedestrians and vehicles.

### Residential quality

37 The proposed development achieves an efficient unit to core ratio. All units meet minimum internal space standards and have been provided with private amenity space compliant with the Mayor's Housing SPG, which is welcomed.

38 Standard 14 of the Mayor's Housing SPG states that where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation. This should be addressed to ensure residential layouts are of the highest quality.

### **Heritage**

39 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions; in relation to listed buildings all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" Any harm identified to heritage assets must be given considerable weight and importance.

40 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation; significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

41 Policy HC1 of the draft London Plan, like London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm.

42 As set out in paragraph 7 above, the site is located adjacent to Regent's Canal Conservation Area and is in close proximity to a number of listed buildings. The applicant has submitted a Townscape and Visual Impact Assessment (TVIA) which assesses the impact of the development on key views into the site. The existing buildings on site do very little to respond to the grain or prevailing built form of the surrounding context. The buildings on site present almost completely blank frontages to all surrounding streets with the exception of Pratt Street, where the main entrance to the site is located. Therefore, there is a clear opportunity to improve the site's relationship with the surroundings through redevelopment.

43 The existing buildings on site are the equivalent of 2-3 storeys, whereas the scheme is up to 7 storeys in height. The development is therefore more prominent in a number of the identified views. The scheme would be more visible from the Regents Canal Conservation Area compared to the other Conservation Areas to the north, from which the development is largely obscured from view. The development, although more visible than previously, would stitch into the surrounding context well, therefore the impact of the development on the setting of Regent Canal Conservation Area is considered to be neutral and would not result in harm. For the same reason, it is not considered that the development will cause any harm to the other Conservation Areas to the north.

44 In terms of the setting of listed and locally listed buildings to the north, the proposed buildings are taller and therefore more prominent in views but the step change in height is a

positive response to the difference in scale. In relation to the Grade I listed Greek Orthodox Church is also negligible, the change reading as a modest increase in height in the background and read at a comfortable distance from the church and grounds itself. On this basis, the development would not result in harm to the setting of the church. The impact on the listed /locally listed terraces on Georgiana and Royal College Streets would not result in harm. The increased scale is not overbearing with the use of set backs at upper levels reduce its bulk notably. Overall, the scheme would fit in well in the surrounding context and GLA officers conclude that the development would not result in harm to the significance of nearby statutorily designated heritage assets and locally listed buildings through impact on setting.

## **Inclusive design**

45 London Plan Policy 7.2 and draft London Plan Policy D3 require that all new developments achieve the highest standards of accessible and inclusive design and can be used safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers; are flexible and response; and realistic. Overall, the scheme demonstrates a good standard of accessibility.

46 10% of units would be provided as wheelchair accessible and the remaining 90% would be designed as accessible and adaptable dwellings in accordance with Part M, Volume 1 of the Building Regulations. As such, the scheme would fully comply with Policy 3.8 of the London Plan and Policy D5 of the draft London Plan.

47 A Fire Strategy should be produced by a suitably qualified assessor and suitably sized fire evacuation lift within each lift core should be provided in accordance with draft London Plan Policies D11 and D3 respectively.

## **Environment**

### Energy

48 The applicant must provide the following additional information and revisions in order to confirm compliance with London Plan, draft London Plan policies and GLA Energy Assessment Guidance: the Be Lean DER, TER and BRUKL sheets and high lean savings are claimed and need verifying; an overheating assessment; the provision of a site wide network and future connection to the district heating network; further details on the heat pumps, solar thermal and PV. The detailed technical comments have been sent to the applicant and the Council.

### Flood risk and drainage

49 The Flood Risk Assessment provided complies with London Plan Policy 5.12 and draft London Plan Policy SI.12. However, the surface water drainage strategy for the proposed development does not comply with London Plan Policy 5.13 and draft Policy SI.13. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided. SuDS maintenance information should also be provided.

50 The development partially meets the requirements of London Plan Policy 5.15 and draft London Plan Policy SI.5. However, the applicant should confirm compliance with the residential consumption targets and revise the sustainability strategy to incorporate rainwater harvesting, consistent with the architectural plans and drainage strategy.

51 The detailed technical comments have been sent to the applicant and the Council.

## Urban greening

52 Urban greening should be embedded as a fundamental element of site and building design, in line with London Plan Policy 5.10 and draft London Plan Policy G1 and G5. The scheme is somewhat deficient in terms of soft landscaping and should explore opportunities to maximise the provision of features such as street trees, green roofs, green walls, rain gardens, wild flower meadows, which should all be considered for inclusion. The applicant should aim to achieve an urban greening factor of 0.4, as set out in Policy G5 of the draft London Plan.

## **Noise and vibration**

53 As noted above, whilst the submitted noise and vibration assessment addresses the impact of environmental noise and plant, it does not address the potential impact of noise generated by the industrial uses proposed within the development on noise sensitive receptors. Of particular concern is the potential impact of the light industrial use on the ground floor of the affordable housing block on residential amenity. The noise assessment must be updated (and plans amended if necessary) to include details of any measures deemed necessary to mitigate and manage any impact that the operation of the proposed industrial uses might have on nearby noise sensitive receptors in accordance with London Plan Policy 7.15 and draft London Plan Policy E7, D12 and D13. If the potential impact on the industrial use within the affordable housing units cannot be addressed by acoustic insulation alone, an alternative more appropriate commercial use for this unit should be identified.

## **Transport**

### Transport assessment

54 Given the location and car-lite nature of the proposals, the transport assessment (TA) is strongly active travel focused with transport connectivity and capacity impacts mitigated mainly on site and in the nearby surrounding area, which is supported.

### Site access

55 Pedestrians will access the site via fully accessible entrances on Royal College Street to the west for the office building, and Georgiana Street to the north for both the residential blocks. This will separate them from the servicing access points, and existing on-street parking bays on St Pancras Way to the east. A new publicly accessible east-west walking route is also proposed between Royal College Street and St Pancras Way.

56 Cyclists will access the office building using a dedicated entrance on Pratt Street to the south, leading into a basement cycle parking area. Each residential block will have its own basement cycle parking area, both with shared access through the main entrance lobbies.

### Servicing

57 The on-site servicing strategy is welcomed as servicing vehicles are separated from the pedestrian and cyclist entrances. The colonnaded internal servicing street will also include a dedicated loading area outside each industrial unit and vehicles moving through it will be able to pass ones already making deliveries.

58 Sufficient loading is proposed for the residential, light industrial and flexible retail uses. The outline Delivery and Servicing Plan (DSP) makes clear how efficient and safe deliveries have been strongly encouraged through the development's design and will continue to be encouraged through management measures once the development is occupied.

## Public transport

59 The nearest bus stops are also very close; 40 metres south of the site on Royal College Street and 180 metres west on Camden Street. Prior to determination; these bus stops should be checked for step free accessibility in accordance with TfL's Accessible Bus Stop Design Guidance. Any necessary improvements should be secured via section 106 or 278 agreements as appropriate.

## Active travel

60 A 50% increase in footfall is expected due to the new development. In response the scheme proposes a minimum footway width of at least 4 metres on Royal College Street along the busiest pedestrian route at the eastern site boundary, which is strongly supported.

61 A Stage 1 Road Safety Audit (RSA) has been provided for the new servicing vehicle access proposed onto St Pancras Way to the west, which is welcomed. TfL will provide detailed comments to the applicant and Council prior to determination.

62 Walking and cycling journeys to key active travel destinations in the local area have also been assessed against the Healthy Streets indicators with photographic evidence in the Active Travel Zone (ATZ) assessment of the application's Healthy Streets TA, which is discussed further below.

## Walking and cycling

63 A minimum of 308 long-stay and 58 short-stay cycle parking spaces are proposed, in accordance with the minimum standards in draft London Plan Policy T6 and Table 10.2. This quantum of cycle parking should be secured by condition. The short-stay cycle parking spaces are proposed in three locations in the public realm all of which are acceptable in principle.

64 The office block cycle parking will be accessed from the dedicated cycling entrance on Pratt Street, via either stairs with a cycle channel or a lift. The provisions for showers, lockers and changing facilities as proposed should be secured by condition.

65 Each residential block has its own independent cycle parking basement area, also accessed via stairs or a lift. Clarification is sought on the detailed design of the cycle parking to ensure compliance with the London Cycling Design Standards (LCDS).

66 The development will be car-free except for three disabled car parking spaces; two proposed at the kerb-side on Georgiana Street to the north for the residential blocks and one on Pratt Street to the south for the office block. This complies with the maximum car parking standards in London Plan Policy 6.13 and Table 6.2, and draft London Plan Policy T6 and Tables 10.3, 10.4 and 10.5.

67 Three existing on-street car parking spaces and a motorcycle parking bay on St Pancras Way, both pay and display, will be retained, although new planting providing Sustainable Urban Drainage (SuDS) benefits will be introduced between the motorcycle and car parking areas.

68 This existing on-street car and motorcycle parking may be needed to accommodate operational vehicle overspill from the light industrial and flexible retail uses, depending on their final character. It could also potentially be converted to become cycle parking, more green landscaping, or on-street Blue Badge car parking in future. On balance retaining these spaces is acceptable. However, a Parking Design and Management Plan should be secured by condition, in accordance with draft London Plan Policy T6, and discharged in consultation with TfL.

### Active travel zone (ATZ)

69 An ATZ Assessment has been provided. The key local active travel destinations and routes it identifies are acceptable. Its conclusions about the availability and quality of key local active travel routes are broadly acceptable.

70 The applicant should explore with LBC how to overcome some of the issues highlighted by the ATZ including lack of access to the canal towpath. S106 contributions should be secured as mitigation where reasonable.

### London-wide network

71 The trip generation information has been reviewed and should be updated prior to determination. For example, trip rates have been derived from sites in outer London that do not seem comparable. Accordingly, public transport impact appears to have been underestimated. The London Underground (LU) and rail demand generated by the new development needs to be split by line and direction to properly assess the impact of this site's additional demand on the LU network.

72 There is a concern that Camden Town station may not have sufficient gate-line capacity and internal circulation space to cope with these additional passengers during peak periods. Two hour peaks periods should be used, from 8-10am and 5-7pm, rather than 8-9am and 5-6pm only. The applicant should also clarify whether rail trips include Overground and TfL Rail services.

73 Based on the scale of development proposed and the expected number of LU trips likely to be generated, financial contributions may be sought toward mitigating the site specific impact of the development on Camden Town LU station. Further discussion about this matter would be welcomed.

### Construction

74 An Outline Construction Management Plan (CMP) has been provided which is acceptable in principle. A full Construction Logistics Plan (CLP) ideally in [TfL's recommended format](#) should be secured by condition and discharged prior to commencement of construction.

## **Local planning authority's position**

75 LBC officers are currently reviewing the applications but have not yet identified a target date for committee.

## **Legal considerations**

76 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, direct the Council under Article 6 of the Order to refuse the application or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purposes of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

77 There are no financial considerations at this stage.

## Conclusion

78 London Plan and draft London Plan policies on principle of development, housing and affordable housing, urban design, inclusive design, energy, drainage and water, urban greening, noise and vibration and transport are relevant to this application. The application does not yet fully comply with the London Plan and draft London Plan as set out below:

- **Principle of development:** The redevelopment of an underutilised non designated industrial site to provide a high density, commercial led mixed use development including the provision of retail and replacement light industrial workshop units is supported in principle. The proposed light industrial units as designed are generally fit for purpose. However, the suitability of the ground floor unit in the residential building for industrial uses is questioned and the mezzanine floors should be removed. The applicant should also demonstrate that appropriate design mitigation is proposed to ensure that the proposed industrial uses would not be subject to unreasonable restrictions which might impact negatively on their operation. The provision of affordable and flexible workspace, including smaller units for SMEs, would also need to be addressed in line with London Plan and draft London Plan policies.
- **Affordable housing:** As the scheme would involve a net loss in industrial floorspace capacity, the threshold for meeting the Fast Track Route is 50%. The affordable housing offer is 50% with a 73:27 split between LAR and Camden Intermediate Rent which is acceptable in principle subject to confirmation that the intermediate units would qualify as genuinely affordable. On this basis the affordable housing offer is fully supported. The Council should secure an early stage review within the s106 agreement.
- **Urban design:** The scale and massing is supported and responds well to the surrounding context. Residential quality is generally high but the applicant must ensure that where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation.
- **Heritage:** It is considered that the scheme would not harm the setting of nearby statutorily designated heritage assets or locally listed buildings.
- **Energy:** The applicant must provide the following additional information and revisions in order to confirm compliance with London Plan, draft London Plan policies and GLA Energy Assessment Guidance: the Be Lean DER, TER and BRUKL sheets and high lean savings are claimed and need verifying; an overheating assessment; the provision of a site wide network and future connection to the district heating network; further details on the heat pumps, solar thermal and PV.
- **Flood risk and drainage:** Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided. SuDS maintenance information should also be provided. The applicant should also confirm compliance with the residential consumption targets and revise the sustainability strategy to incorporate rainwater harvesting, consistent with the architectural plans and drainage strategy.

- **Urban greening:** The applicant should seek to ensure that the scheme would achieve an urban greening factor of 0.4.
- **Noise and vibration:** The noise assessment must be updated (and plans amended if necessary) to include details of any measures deemed necessary to mitigate and manage any impact that the operation of the proposed industrial uses might have on nearby noise sensitive receptors. If the potential impact on the industrial use on the affordable housing units cannot be addressed by acoustic insulation alone, an alternative more appropriate commercial use for this unit should be identified.
- **Transport:** The following key issues would need to be addressed prior to Stage 2: further discussion with TfL on the Road Safety Audit for the proposed servicing egress; the accessibility of the bus stops on Royal College Street; drawings provided to confirm the detailed design of all cycle parking will meet LCDS; a Car Park Design and Management Plan would need to be secured by pre-occupation condition; improvements made to disabled/cycling access onto Regents Canal from the junction between Georgiana Street and St Pancras Way; the trip Generation needs updating to robustly clarify Bus / LU / Overground network capacity and gate-line impacts; and a full TfL CLP secured by pre-commencement condition.

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