Address:	St Pancras Commercial 63 Pratt Street London NW1 0BY	2	
Application Number(s):	2019/4201/P	3	
Ward:	St Pancras & Somers Town		
Date Received:	15/08/2019		

Proposal: Demolition of existing buildings (Class B1c/B8); erection of 3x buildings ranging in height from 5 to 7 storeys above ground and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33x self-contained dwellings (Class C3), flexible retail floorspace (Class A1/A3); associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works.

Background Papers, Supporting Documents and Drawing Numbers:

477-CSJ-00-ZZ-SI-A-0001-S1-P02; 477-CSJ-00-GF-SI-A-0002-S1-P02; 477-CSJ-00-GF-SI-A-0003-S1-P01: 477-CSJ-00-GF-SI-A-0003-S1-P01: 477-CSJ-00-GF-FP-A-0100-S1-P02; 477-CSJ-00-M1-FP-A-0101-S1-P01; 477-CSJ-00-ZZ-EL-A-0300-S1-P01: 477-CSJ-00-ZZ-EL-A-0301-S1-P01: 477-CSJ-00-ZZ-EL-A-0302-S1-P01: 477-CSJ-00-ZZ-SC-A-0200-S1-P02; 477-CSJ-00-GF-SI-A-2000-S1-P02; 477-CSJ-A1-ZZ-DE-A-7030-S1-P01; 477-CSJ-00-B1-FP-A-3101-S1-P02; 477-CSJ-00-GF-FP-A-3102-S1-P05; 477-CSJ-00-M1-FP-A-3103-S1-P02; 477-CSJ-00-01-FP-A-3104-S1-P02; 477-CSJ-00-02-FP-A-3105-S1-P02; 477-CSJ-00-03-FP-A-3106-S1-P02; 477-CSJ-00-04-FP-A-3107-S1-P02; 477-CSJ-00-05-FP-A-3108-S1-P02; 477-CSJ-00-06-FP-A-3109-S1-P02; 477-CSJ-00-07-FP-A-3110-S1-P02; 477-CSJ-00-ZZ-EL-A-3300-S1-P02; 477-CSJ-00-ZZ-EL-A-3301-S1-P02; 477-CSJ-00-ZZ-SC-A-3200-S1-P02; 477-CSJ-00-ZZ-SC-A-3201-S1-P02; 477-CSJ-00-ZZ-SC-A-3202-S1-P02; 477-CSJ-00-ZZ-SC-A-3203-S1-P02; 477-CSJ-00-ZZ-SC-A-3204-S1-P02; 477-CSJ-A1-01-FP-A-5202-S1-P01; 477-CSJ-C1-ZZ-DE-A-7001-S1-P02; 477-CSJ-C1-ZZ-DE-A-7002-S1-P02; 477-CSJ-C1-ZZ-DE-A-7003-S1-P02; 477-CSJ-C1-ZZ-DE-A-7004-S1-P02; 477-CSJ-C1-ZZ-DE-A-7005-S1-P02; 477-CSJ-C1-ZZ-DE-A-7006-S1-P02; 477-CSJ-M1-ZZ-DE-A-7020-S1-P02; 477-CSJ-M1-ZZ-DE-A-7021-S1-P02; 477-CSJ-M1-ZZ-DE-A-7022-S1-P02; 477-CSJ-A1-GF-SK-A-081-S1-C; 477-CSJ-M1-GF-SK-A-071-S1-C; SP108_00_ET Rev P1; SP108_01_GP Rev P3; SP108_02_GM Rev P3; SP108_03_RF Rev P3; SP108_11_01 rev P2; SP108 12 02 Rev P3; SP108 31 PP Rev P2; SP108 32 PT Rev P1; SP108_51_A1 Rev P2; SP108_51_A2 Rev P2; SP108_52_BB Rev P2; SP108_53_CD Rev P2; SP108 54 EF Rev P2; SP108 61 RT Rev P1; SP108 SK15 ET; SP108 JCLA 191114; Archaeological Assessment (August 2019); Affordable Housing Statement (August 2019); Air Quality Assessment (August 2019); Arboricultural Impact Assessment (August 2019); Construction Management Plan (August 2019); Daylight and Sunlight Assessment (amended October 2019); Delivery and Servicing Plan (August 2019); Ecology Report (August 2019); Flood Risk Assessment (August 2019); Noise, Vibration and Ventilation Assessment (August 2019); Planning Statement (August 2019); Planning Statement Addendum (October 2019); Proposed Area Schedule (5 August 2019); Design & Access Statement (August 2019); Statement of Community Engagement (August 2019); Contaminated Land Assessment (August

2019); Interim Report by soiltechnics (22/10/2019); Sustainability and Energy Statement (August 2019); Sustainability and Energy Statement – Response to Greater London Authorities (GLA) comments (25 October 2019); Sustainability and Energy Statement – Response to Camden Council's comments (25 October 2019); Response to Planning Application Comments (October 2019); Response to Greater London Authority Water & Green Infrastructure Memo Stage 1 – Final (12/11/2019); Noise Impact Assessment Report (23 October 2019); Transport Assessment (August 2019); Supplementary Transport Assessment Note (25 November 2019); Servicing Management Plan (August 2019); Waste Strategy Response (undated); Tree Strategy Statement (amended 07/08/2019); Townscape, Visual Impact and Heritage Assessment (August 2019); Basement Impact Assessment Rev D (09/12/2019); Proposed Tree Matrix (SP108_Doc01_TM Rev P3) (28.11.19)

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 legal agreement and referral to the Mayor of London for his direction.

Applicant:	Agent:
Camden Property Holdings Limited	Gerald Eve LLP
	72 Welbeck Street
	London
	W1G 0AY

ANALYSIS INFORMATION

Land Use Details:				
	Use Class	Use Description	Floorspace (GIA sqm)	
Eviating	Light indus	strial / storage and distribution B1(c)/B8	3,196	
Existing	TOTAL		3,196	
	Light indus	Light industrial / storage and distribution B1(c)/B8		
	Office B1(a)		16,345	
Proposed	Retail A1	Retail A1		
	Residentia	Residential C3		
	TOTAL		24,442	

Residential Use Details:								
Residential No			of Bed	droon	ns p	er Unit		
	Type	1	2	3	4	Total		
Market	Flats	7	11	1	-	19		
Intermediate	Flats	4	2	-	-	6		
Affordable (rented)	Flats	-	2	5	1	8		
TOTAL	Flats	11	15	6	1	33		

Parking Details:				
	Parking Spaces (General)	Parking Spaces (Disabled)		
Existing	circa 60	0		
Proposed	0	3 (On-street)		

EXECUTIVE SUMMARY

The application site is St Pancras Commercial Centre at 63 Pratt Street, which occupies a whole 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 x light industrial units dating from the 1980s.

Planning permission is sought to demolish the existing buildings on the site and to erect 3 new buildings, ranging in height from 5 to 6 storeys (plus 2 levels of plant), to re-provide light industrial / storage and distribution floorspace and to provide new office, retail and residential floorspace, including 33 x new dwellings (19 market and 14 affordable). The proposals also include the provision of a new area of public open space which would provide a new east-west link across the site from St Pancras Way to Royal College Street, and also linking to Georgiana Street in the north.

The re-provision of the light industrial / storage and distribution floorspace is welcomed and so is the new provision of office and retail floorspace. The section 106 legal agreement will secure affordable light industrial workspace as well as an Employment and Training Strategy, a package of end-use employment and training obligations and an employment and training financial contribution.

The level of affordable housing provision is policy compliant (50% in floorspace terms) and the Council's Affordable Housing Officer welcomes the proposed tenure mix and dwelling sizes. All of the new dwellings at the site would provide a good standard of living accommodation for future occupiers.

The provision of new public open space at the site is welcomed in terms of improving permeability in the wider area, increasing biodiversity at the site and providing an outdoor space for residents, tenants and visitors to enjoy.

The proposal is considered to be acceptable in terms of the key considerations, namely: the principle of development / land use; affordable housing; design; public open space / trees and landscaping; neighbouring amenity; transport; waste and recycling; energy and sustainability; nature conservation and biodiversity; flood risk and drainage; air quality; contaminated land and basement considerations.

The section 106 legal agreement will secure obligations to mitigate the impact of the proposal on neighbouring properties; the transport impacts of the scheme and sustainability impacts.

OFFICERS' REPORT

Reason for Referral to Committee: Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace [clause 3(i)]; and which is subject to the completion of a Section 106 legal agreement for matters which the Director of Regeneration and Planning, Supporting Communities does not have delegated authority [clause 3(iv)]

The application includes a building outside of Central London with a total floorspace of more than 15,000 square metres [Category 1B(c)] and which is over 30 metres in height [Category 1C(c)] and is therefore considered a 'strategic' application under the Mayor of London Order 2008. The application is thereby referable for his direction, whereby he has power to direct the local authority to refuse the application or call the application in for his own determination.

1. SITE

- 1.1. The application site is St Pancras Commercial Centre, which occupies a whole 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.
- 1.2. The site currently comprises 12 x light industrial units which were constructed in the 1980s on the site of a former factory. The units are arranged in two separate two storey terraces which face onto a central access road which runs northwards through the centre of the site, and which is accessed from Pratt Street, to the south.
- 1.3. On Pratt Street, the main entrance to the site provides a break in the brick facades of the buildings. On all the other elevations (Royal College Street, Georgiana Street and St Pancras Way) the buildings mainly present a blank brick wall to the street with the exception of fire escape doors, some first floor windows, some high level signage and air-conditioning units etc.
- 1.4. The application site is not within a conservation area, although Regent's Canal Conservation Area is to the north and east of the site, on the other sides of Georgiana Street and St Pancras Way respectively.
- 1.5. There are no listed buildings at the site. The nearest listed buildings are on Georgiana Street, to the west (Nos. 32-53 consecutively, north side and Nos. 16-31 consecutively, south side; all Grade II); Lyme Street, to the north-west (Nos. 24-29 and 31-37, south side and Nos. 1-10 consecutively, north side; all Grade II); and Royal College Street, to the north (Nos. 165-181 odd numbers, west side; all Grade II). The Greek Orthodox Church on Camden Street, to the west, is Grade I listed.
- 1.6. Nearby locally listed buildings include: The Golden Lion PH on the corner of Royal College Street and Pratt Street; The Prince Albert PH on the corner between Lyme Street and Royal College Street; Nos. 120-136 & 140-142 Royal College Street; Nos. 92-106 Pratt Street and No. 57 Pratt Street. The surrounding

- area is mixed in character. To the east, on the other side of St Pancras Way, are residential flats (4, 5, 6 storeys tall) which sit between the road and the canal.
- 1.7. To the north, on Georgiana Street, is the Bangor Wharf site (Site 35 in the Site Allocations Plan 2013), where planning permission was refused in June 2016 (and subsequently dismissed at appeal) (Ref: 2016/1117/P) for redevelopment of the site to provide a mixed use development comprising 46 x residential units, new office floor space and associated works. It is likely that a new application will come forward for this site in due course.
- 1.8. To the west, on Royal College Street, there is an electricity sub-station site (Site 36 in the Site Allocations Plan 2013), which features a brick wall along the street edge.
- 1.9. To the south is the Royal Mail site (Site 37 in the Site Allocations Plan 2013). It is possible that this site will be comprehensively redeveloped in the future to provide mixed uses with employment and residential floor space (although a letter sent on behalf of Royal Mail Group Limited states that they have no intention of relocating the depot from its current base).
- 1.10. The application site is not featured within the Site Allocations Plan 2013; however, it does feature in the draft Site Allocations Plan currently being prepared by the Council (Site CSP7c). The draft will be out for public consultation from 13 February 2020 and therefore currently carries very limited weight in decision making at this stage. The application site is also identified in the Camley Street Area SPD (Site f). This document is currently out for consultation and also carries limited weight in decision making at this stage.

2. PROPOSAL

- 2.1. Planning permission is sought for the following works:
 - Demolition of the existing buildings (Class B1c/B8)
 - Erection of 3 x new buildings to provide a mixed use development of:
 - o light industrial / storage and distribution floorspace (Class B1c/B8)
 - o office floorspace (Class B1)
 - o flexible retail floorspace (Class A1/A3)
 - 33 x self-contained residential dwellings (Class C3) (19 x market and 14 x affordable)
 - Associated works including:
 - o Provision of public open space / east-west link through the site
 - Disabled parking
 - Cycle parking
 - Access and servicing
- 2.2. The largest block, at the southern end of the site (adjacent to Pratt Street), would provide light industrial / storage and distribution, office and retail floorspace. This building would be up to 6 storeys tall (with two additional levels of plant above). The building at the north-eastern corner of the site (on the corner between St Pancras Way and Georgiana Street) would provide light industrial floorspace /

storage and distribution floorspace at ground level, with residential units (affordable housing) on the floors above. This building would be 6 storeys tall. The building at the north-western corner of the site (on the corner between Royal College Street and Georgiana Street) would provide retail floorspace at ground level with residential units (market housing) on the floors above. This building would be 5 storeys tall.

- 2.3. A single level basement covers the majority of the site. All 5 of the light industrial / storage and distribution units have basements (Units 3 and 4 also have mezzanine levels). The rest of the basement provides for cycle storage (office and residential), an attenuation tank (below the area of public open space), rainwater harvesting and potable cold water tank rooms and other plant rooms and storage etc.
- 2.4. A vehicular servicing corridor runs north-south through the main (southern) block at ground level, accessed from Pratt Street. As the vehicular route exits the building at the north it turns a right angle towards St Pancras Way to the east where the road re-joins the public highway.
- 2.5. Nos. 1-4 of the light industrial / storage and distribution units (which are housed within the main block) can be accessed from the internal servicing corridor. Units 2, 3 and 4 also have alternative entrances on the St Pancras Way elevation and Unit 1 has an alternative entrance facing north onto the area of public open space in the centre of the site. Unit no. 5 (which is housed within the north-eastern block) only has one entrance, facing south onto the pavement adjacent to the external part of the servicing route. Due to a change in ground levels, the north-eastern corner of this unit is partly subterranean, hence why it is not possible to provide another access to the building on another elevation.
- 2.6. A retail unit occupies the south-western corner of the main block (on the corner of Pratt Street and Royal College Street). The rest of the ground floor of the main block would provide office floorspace, including the main lobby for the offices (the main entrance to the offices is on Royal College Street). There are two other retail units, both located within the north-western block (on the corner of Georgiana Street and Royal College Street).
- 2.7. As noted, the residential units are housed within the two northern blocks on the upper levels of the buildings. In each building, the main access at ground floor level is on Georgiana Street (to the north) and there are secondary entrances on the southern sides of the buildings, accessed from the area of public open space in the centre of the site.
- 2.8. Of the 33 x self-contained dwellings, 19 x would be market housing (7x 1-bed-2-person; 11x 2-bed-4-person; 1x 3-bed-5-person) and 14 x would be affordable housing (4x 1-bed-2-person; 4x 2-bed-4-person; 5x 3-bed-5-person; 1x 4-bed-6-person). The market housing is located in the north-western block and the affordable housing is located in the north-eastern block.
- 2.9. An area of public open space is provided in the centre of the site, between the new buildings, with access from Royal College Street to the west, Georgiana

Street to the north and St Pancras Way to the east. The vehicular servicing route runs adjacent to the area of public open space when it exits the main building.

Revisions

- 2.10. The following revisions have been made during the course of the application:
 - Increase in number of dwellings from 32 to 33
 - Alterations to facades of light industrial / storage and distribution units
 - Addition of plant space at mezzanine level in office building
 - Alterations to north-eastern block Georgiana Street façade
 - Trees and landscaping details

3. RELEVANT PLANNING HISTORY

- 3.1. None
- 4. CONSULTATION SUMMARY

Statutory consultees

GLA

- 4.1. In response to the original plans, the GLA made the following comments:
 - The application does not comply with the London Plan and draft London Plan:
 - Question suitability of light industrial unit below residential units
 - Mezzanine floors should be removed
 - Need to provide affordable and flexible workspace, including smaller units for SME's
 - Fully support affordable housing offer (50%). The Council should seek early stage review in the s106 agreement.
 - Need further discussion with TFL on Road Safety Audit for proposed servicing egress; accessibility of bus stops on Royal College Street; detailed design of cycle parking; a Parking Design and Management Plan and TFL CLP; improvements made to disabled/cycling access onto Regents Canal; the Trip Generation needs updating.
 - Outstanding issues relating to urban design, inclusive design, energy, drainage, urban greening, noise and vibration, water and green infrastructure.
- 4.2. **Officer comment**: The applicant is in ongoing discussions with the Council and the GLA regarding the issues they have raised.

TFL

4.3. The following strategic transport issues need further attention:

- Further discussion with TfL on the Road Safety Audit for the proposed servicing egress.
- Bus stops on Royal College Street need step free accessibility in accordance with TfL's Accessible Bus Stop Design Guidance.
- Drawings to confirm the detailed design of all cycle parking will meet London Cycling Design Standards (LCDS).
- Car Park Design and Management Plan secured by pre-occupation condition.
- Improving disabled/cycling access onto Regents Canal from the junction between Georgiana Street and St Pancras Way, 100m east of the site.
- Trip Generation needs updating to robustly clarify Bus / LU / Overground network capacity and gate-line impacts.
- A full TfL CLP secured by pre-commencement condition.
- Mayoral CIL at a rate of £80 per sq m.
- 4.4. **Officer comment**: The applicant is in ongoing discussions with the Council and TFL regarding the issues raised.

Historic England GLAAS

4.5. The proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The site does not lie within an archaeological priority area and it is unlikely that the proposed development would result in a significant archaeological impact at this location.

Thames Water

4.6. Thames Water have identified an inability of the existing water network infrastructure to accommodate the needs of the development proposal and have therefore suggested conditions relating to ensuring that sufficient capacity is made available, preventing damage to existing water infrastructure and the submission of a piling method statement.

Local Groups

The Regent's Network and Regent's Canal CAAC

- 4.7. Object on the following grounds:
 - The other nearby developments shown in the D&A are misleading (e.g. Parcel Force site, Ted Baker, St Pancras Hospital, Bangor Wharf).
 - Predominant character around Camden Town is low-rise, terraced housing and the proposed development is out of keeping with this.
 - Significant loss of sky and views over the Regent's Canal and the conservation area.
 - Whilst architectural details and internal layouts may be of a high standard, this is the wrong building in the wrong place.
 - New buildings will be totally out of scale with their neighbours.

- Contrary to heritage guidance in the NPPF as fails to properly consider designated and non-designated heritage assets.
- No consideration given to Regent's Canal as a non-designated heritage asset.

South Kentish Town CAAC (on behalf of Rochester and Jeffrey's Conservation Areas)

- 4.8. Object to the proposal on the following grounds:
 - Height of proposed buildings.
 - Underestimating the importance of St Pancras Way.
 - Application does not reference the site being in the Fleet Valley and covering the Fleet River.
 - Implications on archaeology.
 - More attention should be given to the wharves of Regent's Canal (Bangor Wharf and Camden Wharf).
 - Impacts on sunlight.
 - New housing should not be at the expense of the historic environment.
 - Proposed industrial space will be dark and ugly (whereas existing receive good levels of light).
 - Demand for office space is not demonstrated.
 - Need for additional jobs is not demonstrated.
 - The fact the proposals will generate business rates for Camden should not be a criterion for development.
 - Loss of existing open space.
 - Public realm is not improved.
 - Not respecting the early Georgian grid.
 - Proposed glass frontages are not any more inviting / reactivating than the existing inward-looking units.
 - Not sustainable if consider the embodied energy of a new concrete block compared to a retrofit of the existing buildings.
 - Queries about the BIA.
 - Query whether the development needs a basement.

Camden Cycling Campaign

- 4.9. Two responses have been received. The first provided the following comments:
 - Concerned about volume of vehicles crossing the contra-flow cycle track on Royal College Street during construction as this is a key route in Camden's and London's cycle grid and it carries high flows especially in the morning peak
 - Cycle storage and parking meets or exceeds Camden guidelines which is welcomed.
- 4.10. The second noted an objection on the following grounds:

- Use of the public realm (footways and road carriageways, including cycle lanes) during construction (often years) has a very negative impact. The closures make the roads less safe and less welcoming (as cyclists have to divert or use the main carriageway and pedestrians will have to cross the road and/or will walk in the main carriageway). This is inherently unsafe and reduces the proportion of residents using active travel, in contravention of Camden's policies.
- Camden plans to introduce a contra-flow westbound cycle track on the south side of Pratt Street (part of the Delancey-Pratt east-west cycle route). Handing over a significant part of the road to the developer would make this impossible, and would delay the project and/or mean that it would not connect to Pancras Way as planned.
- All operations should be onsite and use of the public highway should only be permitted for specific and short-term purposes.

Adjoining occupiers

4.11. Site notices were displayed on 28/08/2019 (consultation end date 21/09/2019) and a notice was placed in the local press on 29/08/2019 (consultation end date 22/09/2019).

Total number of responses received	3
Number in support	0
Number of objections	3

- 4.12. Three objections have been received. The comments are summarised as follows:
 - Scale of building is too large and out of keeping with surrounding area.
 - Proposed 7 storey building opposite the Golden Lion PH is imposing.
 - Overlooking and loss of daylight / overshadowing to Golden Lion PH and its outdoor seating area.
 - Footpath on other side of Royal College Street been closed for months, if this goes ahead pedestrians won't be able to use the street.
 - Locating new residential units in close proximity to the Royal Mail depot is likely to give rise to future amenity issues and challenges for the proposed occupiers, in particular, noise generated by activities within the yard and vehicular movements to and from the site, particularly during its early and late operational hours.

5. POLICIES

- 5.1. National Planning Policy Framework 2019
- 5.2. London Plan 2016 and Draft London Plan 2019
- 5.3. Camden Local Plan 2017
 - G1 Delivery and location of growth

- H1 Maximising housing supply
- H2 Maximising the supply of self-contained housing from mixed-use schemes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- C1 Health and wellbeing
- C2 Community facilities
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- A1 Managing the impact of development
- A2 Open space
- A3 Biodiversity
- A4 Noise and vibration
- A5 Basements
- D1 Design
- D2 Heritage
- D3 Shopfronts
- **D4** Advertisements
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- TC1 Quantity and location of retail development
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

5.4. Supplementary Planning Policies

Camden Planning Guidance (CPG)

Access for all (2019)

Air Quality (2019)

Amenity (2018)

Basements (2018)

Biodiversity (2018)

Design (2019)

Developer contributions (2019)

Digital infrastructure (2018)

Employment sites and business premises (2018)

Energy efficiency and adaptation (2019)

Interim Housing (as amended March 2019) & Housing (as amended March 2019)

Planning for health and wellbeing (March 2018)

Public open space (2018)

Town centres and retail (2018) Transport (2019) Trees (2019) Water and flooding (2019)

- 5.5. Mayor of London Supplementary Planning Guidance
- 5.6. Regent's Canal Conservation Area Appraisal and Management Strategy (2008)
- 5.7. Draft Site Allocations Plan 2020
- 5.8. Camley Street Area Draft Supplementary Planning Document 2019
- 6. ASSESSMENT
- 6.1. The principal considerations material to the determination of this application are summarised as follows:
 - Land use / principle of development
 - Housing (including affordable housing)
 - Design
 - Public open space / trees and landscaping
 - Impact on neighbouring properties
 - Transport
 - Waste and recycling
 - Energy and Sustainability
 - Nature conservation and biodiversity
 - Flood risk and drainage
 - Air quality
 - Contaminated land
 - Basement

Land use / principle of development

6.2. Policy G1 of the Local Plan seeks to deliver growth in the borough 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, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site; resisting development that makes inefficient use of Camden's limited land; expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Local Plan.

- 6.3. The application site is identified in the Draft Site Allocations Plan (Site CSP7c) as being appropriate for commercial and housing uses and the indicative housing capacity (net gain) is 35 units. As noted above, the draft is not yet out for public consultation (it will be released on 13/02/2020) and therefore the document carries limited weight in decision making at this stage. Nevertheless, the proposals broadly accord with the aims of the document insofar as commercial and housing uses are proposed at the site, including 33 new dwellings.
- 6.4. The application site is also identified in the Draft Camley Street Area SPD (Site f), which sets out a framework for development in the area to ensure that growth and new development contributes positively to the area. The document seeks to add to the housing and employment mix that already exists in the area, but in a more intensive, varied and better-designed way. It also seeks to open up new pedestrian routes and public spaces. The document highlights the fact that the new owners of the application site are preparing proposals to submit a planning application. This document also carries limited weight in decision making at this time; however, it is considered that the proposals broadly accord with the aims of the SPD.

Re-provision of light industrial / storage and distribution (Class B1c/B8) floorspace

- 6.5. Policy E1 of the Local Plan aims to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The policy notes that the Council will support businesses of all sizes, in particular start-ups, small and medium sized enterprises; support local enterprise development, employment and training schemes for Camden residents; and direct new office development to the growth areas, Central London, and the Town Centres. The application site is not located in a growth area, Central London or a designated Town Centre. Nevertheless, the policy does not preclude office development outside of the areas specifically highlighted in the policy.
- 6.6. Policy E2 encourages the provision of employment premises and sites in the borough and seeks to protect premises or sites that are suitable for continued business use. The proposals involve the demolition of the existing buildings at the site, which are all in Class B1c (light industrial) or B8 (storage and distribution) use. There are 12 units at the site, although a letter from Montagu Evans (dated 30/09/2019), submitted on behalf of the applicant in response to queries from the Council's Economic Development Team, notes that all of the units are in a poor condition and 25% of the units are currently vacant.
- 6.7. Policy E2 allows for higher intensity redevelopment of premises or sites that are suitable for continued business use, provided that:
 - c. the level of employment floorspace is increased or at least maintained;
 - d. 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 CAZ or the local economy;

- f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
- g. the scheme would increase employment opportunities for local residents, including training and apprenticeships;
- h. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and
- i. for larger employment sites, any redevelopment is part of a comprehensive scheme.
- 6.8. In this case, it is proposed to re-provide light industrial / storage and distribution floorspace (Class B1c/B8) at the site, as well as the new provision of office floorspace (Class B1), flexible retail floorspace (Class A1/A3), public open space and self-contained housing (market and affordable) (Class C3).
- 6.9. The existing buildings provide 3196 sqm of light industrial / storage and distribution floorspace and the proposed scheme would provide 3,296 sqm of light industrial / storage and distribution floorspace. The GLA have queried whether the proposed mezzanine floorspace should be included in the calculations, because it falls short of the minimum recommended floor to ceiling heights (i.e. less than 3.5 metres) and in response to this, the applicant has suggested that the existing mezzanines in the existing buildings should also be discounted for the same reason. The existing buildings provide 2,230 sqm (GIA) of light industrial / storage and distribution floorspace (excluding the mezzanine levels) and the proposed scheme would provide 2,952 sqm (GIA) of light industrial / storage and distribution floorspace (excluding the mezzanine levels). As such, there is a net increase in light industrial / storage and distribution floorspace, which is welcomed in line with Policy E2(c).
- 6.10. The number of individual units is reduced (from 12 to 5); however, there is scope to further subdivide the units in future depending on tenant requirements. The aforementioned letter from Montagu Evans notes that they expect there to be demand for larger units. The letter also notes that the ground level glazing will allow natural light into the units and will allow the tenants to advertise themselves, and that the basement spaces would be suitable for storage, where natural light is not a requirement.
- 6.11. The re-provided light industrial / storage and distribution floorspace would be located partly within the main building, at the southern end of the site (accessed from Pratt Street) and partly within the north-eastern building (on the corner of St Pancras Way and Georgiana Street). Five separate ground floor units would be provided in total (all with basements and 2 with mezzanine levels). Units 1-4 would be located in the main building with access from the internal servicing corridor (as well as alternative entrances) and Unit 5 would be located in the north-eastern block with one entrance, facing south onto the pavement adjacent to the external part of the servicing route.

- 6.12. Overall, the quality of the proposed light industrial / storage and distribution floorspace is considered to be acceptable and the proposal is considered to comply with Policy E2(d).
- 6.13. Policy E2(h) requires that other uses included in a mixed-use scheme do not prejudice the continued operation of businesses on the site. Concerns were raised about the location of a light industrial use below residential units in the north-eastern block; however, the applicant has confirmed that the fabric of the building is designed to prevent noise break-out. They note that there will be an acoustically separating ceiling structure above the unit and the lease conditions will require new tenants to isolate equipment from the structure to prevent any noticeable noise or vibration in the flats above. Suitable planning conditions are suggested to control external noise levels (condition no. 3) and to ensure that anti-vibration measures are put in place prior to the first use of the relevant units (condition no. 4).
- 6.14. With regards to other impacts of the commercial uses at the site, the section 106 legal agreement will secure a Delivery and Servicing Management Plan (more information in the Transport section of this report), which should minimise harmful impacts on nearby and neighbouring residential properties.
- 6.15. Policy E2 also requires the provision of floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable (part f); and that schemes increase employment opportunities for local residents, including training and apprenticeships (part g). The applicant is offering the following affordable workspace offer: 20% of the light industrial floorspace (GIA) at 60% of the market value for a period of 10 years. In addition, the applicant is also prepared to market the whole of the light industrial floorspace exclusively to Camden registered businesses (including current tenants) for a period of 6-months (thereafter, the light industrial floorspace would be placed on the open market). The proposed offer has been altered during the course of the application. Initially, the applicant was proposing to offer 20% of the light industrial floorspace (GIA) at 80% of market value for 20 years, which is essentially the same offer (20% over 20 years versus 40% over 10 years); however, officers consider that a bigger discount for a shorter period of time would have a greater impact in terms of supporting light industrial businesses to access the space and with the change expected over the next few years in the area, a focus on greater support for light industrial businesses is likely to be more beneficial in the short term too. It is also worth noting that many of the existing occupiers are not small, local businesses but many are national businesses with premises nationwide. On balance, the proposed affordable workspace offer is considered to be acceptable.

New office floorspace

6.16. The proposals involve the provision of 16,345 sqm (GIA) of new office floorspace (Class B1), which would be located within the main building at the southern end of the site. The main pedestrian entrance would be on Royal College Street (to the west), the entrance to the basement-level cycle storage would be on Pratt

- Street (to the south) and there would also be access for servicing from the internal servicing corridor.
- 6.17. The new building would provide 5 floors of open-plan office floorspace (Levels 1 to 5) with a central core that allows the floors to be subdivided in future if required. Level 4 benefits from two roof terraces (one to the east and one to the west) and so does Level 5 (one to the north and one to the south). Overall, the quality of the proposed office floorspace is considered to be high and the provision of office floorspace is welcomed, particularly as the application site is relatively close to Camden Town Centre, where Policy E1 seeks to direct new office floorspace (albeit the policy does not preclude office development outside of the specified areas too). Furthermore, the Draft Site Allocations Plan and the Draft Camley Street Area SPD both envisage commercial / employment uses at the site.
- 6.18. As noted, Policies E1 and E2 of the Local Plan support the provision of affordable workspace. The applicant is not proposing any affordable workspace within the office building (instead they are proposing affordable workspace in the light industrial space, as discussed above). The section 106 legal agreement will, however, secure an Employment and Training Strategy to demonstrate how employment and training requirements will be addressed and supported, and it will also secure a package of end-use employment and training obligations.
- 6.19. The sub-text to Policy E1 also notes that the Council will work with partners to reduce inequality through training and apprenticeship schemes. Policy C1 (Health and wellbeing) also touches on the benefits of training and apprenticeship schemes to reduce inequality in the borough. In accordance with CPG Employment sites and business premises (2018) (paragraphs 48-55 and 73-75), the Council requires a financial contribution to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden (the contribution is lower than for developments involving a loss of employment space to reflect the fact these developments are providing new employment opportunities).
- 6.20. In this case, the proposed figure for the employment and training contribution is £399,927.465 The breakdown of the costs is shown in the table below: (the figures are based on the new office floorspace).

Net increase in floor space (sqm GIA) / 12sq m (space requirement per full time employee)	16,345 / 12
= full time jobs created	= 1362
Full time jobs created x 21% (% of Camden residents in the workforce)	1362 x 21% = 286.02
x 35% (% of employees requiring training)	286.02 x 35% = 100.107
x £3,995 (cost to provide training per employee)	
	100.107 x £3995 = £399,927.465

Retail floorspace

- 6.21. Policy TC1 seeks to focus new shopping and related uses in Camden's designated Growth Areas and existing Town and Neighbourhood Centres and the policy notes that the Council will apply a sequential approach to retail and other town centre uses outside of these areas.
- 6.22. In this case, the application site is not within a Growth Area or designated centre; however, each of the proposed retail units is relatively small and the units are therefore unlikely to harmfully impact on the vitality or viability of nearby Camden Town Centre. Furthermore, there is a lack of retail uses in the immediate area and it is considered that the new light industrial / storage and distribution, office and residential uses proposed as part of the overall scheme, as well as existing residential in the area, would benefit from the provision of local retail uses at the site.

Residential floorspace

- 6.23. As noted above, Policy G1 promotes the most efficient use of land and buildings in the borough and expects the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible.
- 6.24. Policy H1 regards housing as the priority land use of the Local Plan and Policy H2 promotes the inclusion of self-contained homes as part of a mix of uses. On this basis, the provision of 33 x self-contained residential flats as part of the proposals is welcomed.
- 6.25. Overall, the principle of development is considered to be acceptable, subject to the detailed considerations below.

Housing (including affordable housing)

Affordable housing

- 6.26. Policy H4 seeks to maximise the supply of affordable housing in the borough. The policy also aims for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.
- 6.27. The Council expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sqm (GIA) or more. Targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing floorspace is generally considered to create capacity for one home. An affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings and for developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site.

6.28. In this case, the proposed scheme provides 33 x self-contained dwellings, of which 19 would be market housing and 14 would be affordable, which represents 42% affordable housing in unit terms. However, in floorspace terms (habitable rooms) the affordable housing offer is 50%, which is welcomed. On the basis that 50% affordable housing is being provided, no viability review is required.

Tenure

- 6.29. The guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing. Of the 14 affordable units, 8 would be social-affordable rented and 6 would be intermediate, which represents a 43/57 split in terms of unit numbers; however, in floorspace terms (habitable rooms), the split is 73/27, which is considered to be acceptable, particularly as the Council's Affordable Housing Officer is supportive of the proposed unit sizes.
- 6.30. The intermediate housing will be provided as Camden Intermediate Rent, which is accessible to households on an income of between £30,000 and £40,000. The rent levels for all the affordable units will be secured by the legal agreement.

Dwelling sizes

- 6.31. Policy H7 of the Local Plan seeks to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mis-matches between housing needs and existing supply. The policy requires all housing development to contribute to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT) and to include a mix of large (3 bedrooms and more) and small homes (studios, 1-bed and 2-bed units).
- 6.32. The DSPT indicates that for social-affordable rented homes, 2-bed and 3-bed units have high priority, 4+ bed units have medium priority and 1-bed units / studios have lower priority. For intermediate affordable housing, 1-bed units / studios have high priority, 2-bed units have medium priority and 3-bed and 4+ bed units have lower priority. For market housing, 2-bed and 3-bed units have high priority and 1 bed units / studios and 4+-bed units have lower priority.
- 6.33. The proposal provides the following:

Туре	Tenure
Social affordable rented	2x 2-bed
	5x 3-bed
	1x 4-bed
Intermediate affordable	4x 1 bed
	2x 2-bed
Market	7x 1-bed
	11x 2-bed
	1x 3-bed

6.34. Policy H7 notes that the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to a number

of factors, including: the different dwelling size priorities for social rented, intermediate and market homes; the character of the development, the site and the area, including the impact of the mix on child density; site size, and any constraints on developing the site for a mix of homes of different sizes; the economics and financial viability of the development; and the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.

6.35. In this case, the proposed dwelling size mix is considered to fit well with the Council's DSPT insofar as a high proportion of the social-affordable rented unit are 2 and 3 bed units; a high proportion of the intermediate units are 1-bed units and a high proportion of the market units are 2-bed units. Furthermore, the provision of a 4-bed wheelchair accessible unit is also welcomed by the Council's Affordable Housing Officer.

Quality of residential accommodation

- 6.36. Policy D1 of the Local Plan seeks to secure high quality design in development. In relation to housing, part (n) of the policy requires development to provide a high standard of accommodation.
- 6.37. The sub-text to Policy D1 notes that all residential developments are 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 self-contained with its own secure private entrance; has good ceiling heights and room sizes; is dual aspect except in exceptional circumstances; has good natural light and ventilation; has good insulation from noise and vibration; has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities); incorporates adequate storage space; incorporates outdoor amenity space including balconies or terraces; and is accessible and adaptable for a range of occupiers.
- 6.38. The sub-text goes on to note that new dwellings and conversions to residential use will be expected to meet the government's nationally described space standard. The Council will also require development to adhere to the Mayor's Housing Supplementary Planning Guidance.

Dwelling size

6.39. The proposal provides the following:

	Unit reference	Location	Dwelling type	Floorspace (sqm)	Required standard (sqm)
	M_01_01	Market block – 1st floor	2B4P	86.6	70
	M_01_02	Market block – 1st floor	1B2P	53.8	50
Ī	M_01_03	Market block – 1 st floor	2B4P	80.3	70

M_01_04	Market block –	1B2P	58.8	50
M_01_05	Market block –	2B4P	87.6	70
A_01_01	Affordable block – 1 st floor	2B4P	71.3	70
A_01_02	Affordable block – 1 st floor	3B5P	87.3	86
A_01_03	Affordable block – 1 st floor	1B2P	50.5	50
M_02_01	Market block – 2 nd floor	2B4P	86.6	70
M_02_02	Market block – 2 nd floor	1B2P	53.8	50
M_02_03	Market block – 2 nd floor	2B4P	80.3	70
M_02_04	Market block – 2 nd floor	1B2P	58.8	50
M_02_05	Market block – 2 nd floor	2B4P	87.6	70
A_02_01	Affordable block – 2 nd floor	2B4P	71.3	70
A_02_02	Affordable block – 2 nd floor	3B5P	87.3	86
A_02_03	Affordable block – 2 nd floor	1B2P	50.5	50
M_03_01	Market block – 3 rd floor	2B4P	86.6	70
M_03_02	Market block – 3 rd floor	1B2P	53.8	50
M_03_03	Market block – 3 rd floor	2B4P	80.3	70
M_03_04	Market block – 3 rd floor	1B2P	58.8	50
M_03_05	Market block – 3 rd floor	2B4P	87.6	70
A_03_01	Affordable block – 3 rd floor	2B4P	71.3	70
A_03_02	Affordable block – 3 rd floor	3B5P	87.3	86
A_03_03	Affordable block – 3 rd floor	1B2P	50.5	50
M_04_01	Market block – 4 th floor	2B4P	86.6	70
M_04_02	Market block – 4 th floor	3B5P	115.6	86
M_04_03	Market block – 4 th floor	1B2P	58.8	50

M_04_04	Market block – 4 th floor	2B4P	87.6	70
A_04_01	Affordable block – 4 th floor	2B4P	71.3	70
A_04_02	Affordable block – 4 th floor	3B5P	87.3	86
A_04_03	Affordable block – 4 th floor	1B2P	50.5	50
A_05_01	Affordable block – 5 th floor	3B5P	91	86
A_05_02	Affordable block – 5 th floor	4B6P	121.6	99

6.40. The government's nationally described space standards are set out in the final column of the table above. All of the proposed units would meet or, in many cases, exceed the required space standards, which is welcomed. Furthermore, all of the proposed new dwellings would benefit from very good levels of in-built storage, which is welcomed.

Self-contained with own entrance

6.41. All of the proposed 33 residential units would be self-contained with their own private entrances. In each block, the main entrance is on Georgiana Street (to the north) and there is an alternative entrance on the southern side of the buildings leading to the area of public open space. Each of the residential units would be accessed from communal corridors, accessed either by stairs or by lift from the ground floor.

Ceiling heights and room sizes

6.42. The ceiling heights (2.8m) would be acceptable in all the new dwellings. Similarly, the room sizes are all considered to be generous (particularly the main living areas) and the layout of each flat is considered to be well planned. In each unit, the entrance door opens into a hallway rather than directly into living space, which is welcomed.

Aspect / natural light

- 6.43. Not all of the units would be dual-aspect (7x units in the market block would be single aspect); however, the units that are not dual-aspect are the smaller units (1B2P) and they benefit from pleasant outlooks onto the main streets of Royal College Street and Georgiana Street, rather than towards the centre of the site. On balance, the fact that all of the units have access to outdoor space in the form of a balcony is considered to make up for the fact some of the units are single aspect.
- 6.44. Four of the 7 single-aspect units are north-facing which means they are likely to suffer from low levels of sunlight. Again, on the basis that these units have access to private outdoor amenity space, this is considered to be acceptable, on balance. If the single aspect units were located on the southern side of the

building (to maximise sunlight and daylight) their outlook would be much more limited than the proposed outlooks onto the main streets.

Overlooking

- 6.45. There may be some instances of overlooking between the new residential units, particularly between the two separate housing blocks, which are 7.5 metres apart. However, the layouts have been designed to minimise overlooking between units. For example, there are windows on the eastern elevation of the market housing block which serve main living spaces and there are also small balconies which serve a bedroom. However, the windows on the western elevation of the affordable housing block only serve bedrooms and the windows to serve the main living spaces are on the front (north) elevation, facing towards Georgiana Street rather than towards the other housing block. On balance, this is considered to be acceptable.
- 6.46. The market block is 8.1 metres from the main office building and there is potential for overlooking between the separate uses. However, the only windows on the southern elevation of the market housing block serve bedrooms, which is considered to be acceptable. At the affordable block, some of the south-facing windows serve a main living space; however, there is a separation distance of over 12 metres between the residential windows and the main office block and the main living space is also served by another window facing east onto St Pancras Way. This means that if overlooking posed a problem during the day when the office building is in use, it would be possible to close a blind or curtains without losing outlook from the room.

Noise / vibration

- 6.47. In most cases, similar uses are stacked above each other to mitigate against noise transfer between units. A suitable planning condition is suggested to ensure that the noise levels in rooms do not exceed specified limits (condition no. 5).
- 6.48. As noted above, concerns have been raised about noise from the light industrial unit in the north-eastern building impacting on the residential flats above. The applicant has confirmed that the fabric of the building is designed to prevent noise break-out and the lease conditions will require new tenants to isolate equipment from the structure to prevent any noticeable noise or vibration in the flats above. As already noted, suitable planning conditions are suggested to ensure that any plant/equipment does not exceed specified noise levels and that any plant is fitted with anti-vibration measures (conditions nos. 3 and 4).
- 6.49. A comment has also been received from the Royal Mail, in relation to their depot to the south of the application site, noting that they have concerns that the development will give rise to future amenity issues and challenges for the proposed occupiers, in particular, noise generated by activities within the yard and vehicular movements to and from the site, particularly during its early and late operational hours. Given that the proposed residential accommodation is located to the north of the application site (and further away from the depot than

other residential properties), it is not considered likely that future occupiers would be harmed by the operations at the Royal Mail depot, or that Royal Mail's continued operation would be in any way prejudiced by the proposed development.

Permanent partition between eating and sleeping areas

- 6.50. The proposal does not involve the creation of any studio units and in all the new dwellings there would be a permanent partition between eating and sleeping areas, which is welcomed.
- 6.51. In the affordable block, Units A_01_02, A_02_02, A_03_02, A_04_02, A_5_01 and A_05_02 (the 3 and 4 bed units) all have separate kitchens, accessed via the living rooms, which is welcomed particularly as these units are more likely to accommodate families.
- 6.52. In all the other units, the combined living room / kitchens are generously sized, which means they would be able to cater for the greater range of activities that are likely to occur therein.

Private outdoor amenity space

- 6.53. All of the new dwellings would benefit from their own private outdoor amenity space in the form of balconies, which is welcomed. In the market block, Units M_01_05, M_02_05, M_03_05 and M_04_04 (all 2 bed units) would have 2 separate balconies, one on the northern elevation with views to Georgiana Street and one on the eastern elevation with views towards the other housing block and also towards the area of public open space. In the affordable block, Units A_01_02, A_02_02, A_03_02 and A_04_02 (all 3 bed units) would also have 2 separate balconies, one on the northern elevation with views to Georgiana Street and one on the eastern elevation with views towards St Pancras Way. At level 5, Unit A_05_02 (4 bed) would have two separate balconies on the eastern elevation; however, it is not possible to access one from the other due to the shape of the building.
- 6.54. The balconies on the northern elevation are likely to be overshadowed due to their orientation and position on the building; however, these balconies would have a pleasant outlook onto Georgiana Street and the provision of outdoor space is nevertheless welcomed. Residents in these flats would be able to use the area of public open space in the centre of the application site. Alternatively, Regent's Canal is directly to the east of the application site and St Martin's Gardens is one block to the west.

Accessible and adaptable

6.55. Policy H6 of the Local Plan requires 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2), and 10% to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

- 6.56. All of the residential units accord with Building Regulations M4(2) and two wheelchair accessible units are also provided (one in the market block M_01_04; and one in the affordable block A_05-02) which equates to 6%. The proposed level of provision of wheelchair housing is considered to be acceptable and suitable planning conditions are suggested to ensure their provision (condition nos. 6 and 7).
- 6.57. Within each housing block, the communal areas would all have step-free access, which is welcomed.
- 6.58. The sub-text to Policy H6 notes that the Council expects all new developments to be car-free; however, wheelchair users may need access to a car as a consequence of their disability. Two disabled parking bays will provided on Georgiana Street. These will be completed as part of the highway works.

Design

- 6.59. Policy D1 of the Local Plan seeks high quality design in development which respects local context and character, is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation; is of sustainable and durable construction and adaptable to different activities and land uses; comprises details and materials that are of high quality and complement the local character; integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; is inclusive and accessible for all; promotes health; is secure and designed to minimise crime and antisocial behaviour; responds to natural features and preserves gardens and other open space; incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening, for example through planting of trees and other soft landscaping; incorporates outdoor amenity space; preserves strategic and local views; and for housing, provides a high standard of accommodation; and carefully integrates building services equipment. The policy notes that the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. The Council also expects excellence in architecture and design and will ensure that the significant growth planned for under Policy G1 will be provided through high quality contextual design.
- 6.60. The surrounding townscape is comprised of a mixture of scales and architectural styles including 3 storey Georgian terraces, larger former warehouse buildings up to 6 storeys tall and newer residential development along St Pancras Way at 4, 5 and 6 storeys tall. It is envisaged that the area will undergo significant transformation in future years in terms of intensification of the mix of uses and the character and appearance of the area.
- 6.61. Whereas the existing buildings at the site turn their backs on the surrounding streets by presenting blank outer walls (apart from the entrance on Pratt Street), the proposed new buildings would occupy the four corners of the site activating

- each edge with entrances and activity associated with the different uses (light industrial / storage and distribution, office, retail, residential). This represents a great improvement to the streets immediately surrounding the application site.
- 6.62. The height, scale and massing of the proposed buildings has been carefully considered in relation to the surrounding area. Along Royal College Street the elevation of the office building comprises 4 storeys to the parapet. An additional 2 storeys are stepped back from the parapet to reduce their impact on the street. The height and scale of the residential building at the north-western corner of the application site steps down to 5 storeys to address the change in scale towards the existing 3 storey Georgian terrace to the north of the application site.
- 6.63. Along Pratt Street the parapet of the office building steps up to 5 storeys with a set back 6th storey. Then on St Pancras Way, the parapet of the main block is once again 4 storeys tall, with an additional two storeys stepped back, to mitigate the impact on the street, and the north-eastern housing block would be 6 storeys tall (i.e. one storey taller than the other residential block), which is broadly commensurate with the scale of the 5 and 6 storey buildings along St Pancras Way.
- 6.64. Fourteen viewpoints have been assessed as part of the 'Townscape, Visual Impact and Heritage Assessment' (TVIHA) submitted with the planning application, using "before and after" views. The document describes the site context, noting that the site occupies a whole block between two main roads (Royal College Street and St Pancras Way) and is located very close to Regent's Canal. The document highlights the fact that the existing building does not make a positive contribution to the character and appearance of the surrounding area and it comments on the low density development and "inhospitable" townscape and notes that the existing buildings, by turning their backs on the surrounding streets, "contribute to the hostile nature of the local public realm". The document then goes on to conclude that, within this context, there exists an opportunity for a new scheme to respond positively to an evolving local context, enhancing one's experience of Royal College Street, St Pancras Way, Pratt Street and Georgiana Street. To do this, it is suggested that new development should: "establish a positive presence on the skyline in local and mid-distance views; provide well scaled, proportioned and animated frontages to the four streets it addresses that enhance the public realm; and provide a well-considered development of a high quality of architecture that enhances the local townscape and works well alongside future developments to the north and south to strengthen sense of place and neighbourhood identity".
- 6.65. In summarising the impact on the different viewpoints, the TVIHA concludes that the development would significantly enhance the character and appearance of the local area, by replacing the C20th storage buildings that turn their backs on their surroundings with a characterful mixed-use development that enhances the local townscape. The document notes the following: "The Development's location on Royal College Street, St Pancras Way, Pratt Street, and Georgiana Street, is such that it would be visible in short and medium range views along these primary and secondary traffic corridors all year round... The Development would be seen to engage positively with its context, enhancing the quality of these views and

- signalling the beginning of efforts to repair and reintegrate a disengaged part of the borough.
- 6.66. The document goes onto note: "Short and medium range views of the Development would also be possible from a short section of the Regent's Canal towpath to the north of Gray's Inn Bridge; points along Lyme Street to the northwest; and St. Martin's Gardens to the south-west...The Development's residential and office buildings would be seen in conjunction with modern canalside development overlooking the bridge today, reinforcing the sense of arrival at this northern threshold to the St Pancras area. (Ffrom Lyme Street) ... the blank red brick walls of the Site's warehouse would be replaced by a development scaled to respect existing building heights. Visibility would be much reduced in winter when trees on this street are in leaf. Where glimpsed from St. Martin's Gardens, the Development would be seen beyond post war buildings on Camden Street and through trees. The Development would appear as a largely incidental feature in views from Camden Street to the south-west."
- 6.67. It is considered that the TVIHA makes a fair and reasonable assessment of the impact of the scheme. Whilst the height and scale of the proposed redevelopment buildings is at the upper scale range for buildings within the local townscape, the proposals are considered to fit comfortably within the townscape and are consistent with the Council's vision for the intensification of the wider area.
- 6.68. It is considered that the proposed palette of materials, their colour and composition also provide a positive response to the existing character of the surrounding townscape. The double bay structure of the office building formed by the rhythm and distance of the vertical pilasters gives the building a horizontal emphasis. Red sandstone panels and the white concrete pilasters provide a resonance with other warehouse style buildings in the local area (e.g. the Centro Building further west along Pratt Street). The articulation of the vertical pilasters with projecting square profiles at each floor, their pairings at the corners of the office building and the fluted profiles of their surfaces add texture and interest to the office elevations when closer to the building.
- 6.69. The use of red sandstone panels and white concrete pilasters is carried through to the residential buildings providing coherence between the new group of buildings at the application site; however, closer spacing of the vertical pilasters provides a finer grain and more vertical emphasis to the building, which is more in keeping with residential development to the north of the application site. The use of brick to the base of the residential buildings and sections of brick along their facades, along with green glazed tiles to the set-back upper storey and lining the inner walls of the balconies, define the particular character of these buildings and provide a correspondence to the use of brick and glazed tiles close by.
- 6.70. A suitable planning condition is suggested to require details of all facing materials (manufacturer's specification and samples of all materials to be provided on site) to be agreed in writing with the planning authority prior to the relevant works commencing (condition no. 8). A further condition is suggested to ensure that no lights, meter boxes, flues, pipes, telecommunications equipment, alarm boxes

- etc. are fixed or installed on the external facades of the building without permission (condition no. 9). This is to ensure that the high quality design is not slowly eroded over time through conspicuous, ad hoc additions to the buildings.
- 6.71. Overall, it is considered that the proposed layout of the site would provide better integration of the site into its surroundings than the existing buildings. The proposed height and scale of the development has been carefully considered in relation to existing and adjacent buildings making a positive response to the context of the site, consistent with the Council's vision for the wider area and its intensification. The architectural design of each of the buildings is considered to be of high quality and would make a positive contribution to the character and appearance of this emerging neighbourhood. The proposals are therefore considered to comply with Policy D1 of the Local Plan.

Public open space / trees and landscaping

- 6.72. As noted above, Policy D1 of the Local Plan seeks development that integrates well with the surrounding streets and open spaces; which improves movement through the site with direct, accessible and easily recognisable routes; is secure and designed to minimise crime and antisocial behaviour; and which incorporates high quality landscape design and maximises opportunities for greening, for example through planting of trees and other soft landscaping.
- 6.73. Policy A2 of the Local Plan seeks the provision and enhancement of open space in the borough. The policy notes that, in order to secure new and enhanced open space and ensure that development does not put unacceptable pressure on the borough's network of open spaces, the Council will: I) seek developer contributions for open space enhancements using section 106 agreements and the Community Infrastructure Levy (CIL); m) apply a standard of 9sqm per occupant for residential schemes and 0.74sqm for commercial and higher education developments, while taking into account any funding for open spaces through the CIL; n) give priority 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; o) ensure developments seek opportunities for providing private amenity space; p) give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space; q) seek opportunities to enhance links between open spaces recognising the multiple benefits this may bring; and, r) tackle deficiencies to open space through enhancement measures.
- 6.74. The application involves the creation of an area of public open space in the centre of the site, between the three separate buildings, which would form part of a new pedestrian route across the site linking St Pancras Way, Royal College Street and Georgiana Street.

Quantity of public open space

6.75. The application site is not identified as being deficient in access to open space (i.e. it is not more than 280 metres or a 5 minute walk away from a designated

- public open space) (Regent's Canal can be accessed from Gray's Inn Bridge directly to the north-east of the application site).
- 6.76. The Local Plan seeks the on-site provision of open space wherever possible and the proposed development of the site, by virtue of its nature, would create additional need for public open space. As noted, for residential development, the standard requirement is 9sqm per occupier, and for commercial development the standard requirement is 0.74sqm per worker.
- 6.77. The application proposes approximately 660 sqm of new public open space within the application site; however, the requirement for the site is 1748.91 sqm (as demonstrated by the following tables).

Residential

No. of additional dwellings	Ward	Open space requirement (standard x average household size x no of dwellings)	= total requirement (sq m)
33	St Pancras & Somers Town	9 sqm x 2.43 x 33	721.71

Commercial

Additional floorspace (sqm)	Type of floorspace (Use Class / Sub Category and Sub Sector)	Open space requirement (standard x (amount of floorspace per worker)	= total requirement (sq m)
17,072	B1 office	0.74sqm x (17,072/13)	971.79
3,519 3297	B1c light industrial	0.74 x (3,519/47)	55.41 51.91
TOTAL			1027.2 1023.7

TOTAL	1748.91 sqm	1745.41
Commercial requirement	1027.2 sqm	
Residential requirement	721.71 sqm	

1085.41 62%

6.78. The shortfall is 1,088.91 sqm (62%) and therefore the legal agreement will secure a financial contribution to compensate for the shortfall in public open space provision on-site. The development would be liable for a payment in lieu of

£248,186.60 (i.e. 62% of the total requirement which would be £400,300.96). The calculations are shown in the tables below.

Residential – Capital costs (incl. design and administration costs)

No. of additional dwellings	Ward	Open space requirement (standard x average household size x no of dwellings) multiplied by capital cost	= total payment for capital costs
33	St Pancras & Somers Town	(9sqm x 2.43 x 33) x£200	£144,342

Residential – Maintenance costs

No. of additional dwellings	Ward	Open space requirement (standard x average household size x no of dwellings) multiplied by capital cost	= total payment for capital costs
33	St Pancras & Somers Town	(9sqm x 2.43 x 33) multiplied by £7, multiplied by 10 years	£50,519.70

Residential - Sum of all costs

Capital costs	£144,342
Maintenance costs	£50,519.70
TOTAL	£194,861.70

Commercial

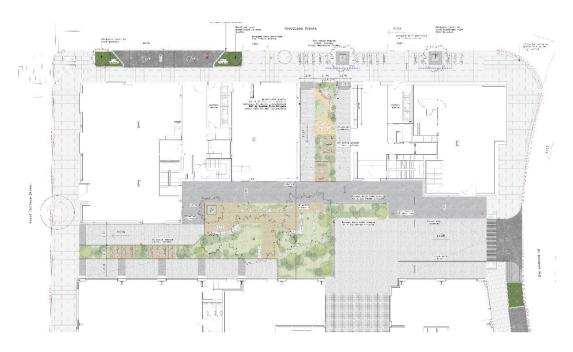
Additional	Type of	Capital cost	= total payment
floorspace	floorspace (Use Class / Sub Category And Sub Sector)	(standard x amount of floorspace per worker x capital cost of greenspace works per	for capital costs

		sqm	
17,072	B1 office	0.74sqm x (17,072/13) x£200	£194,358.15
3,519	B1c light industrial	0.74 x (3,519/47) x £200	£11,081.11
TOTAL			£205,439.26

Residential requirement	£194,861.70
Commercial requirement	£205,439.26
TOTAL	£400,300.96

Quality of public open space

- 6.79. The sub-text to Policy A2 notes that, where new open space is provided on site, it should take into account the characteristics of the site and the local context. This includes existing street patterns and pedestrian routes. It is also noted that the open space should be easy to use by people of all ages and abilities and must be safe and secure for everyone. An important consideration will be the long-term ability for a space, including landscaping, planting, street furniture and surfaces, to be managed effectively. CPG Public Open Space provides further guidance, including a guide in Appendix D for ensuring quality in the provision of new public open space.
- 6.80. As noted, the new public open space would be located in the centre of the site, framed by the three new buildings, and would form part of a new pedestrian route across the site linking St Pancras Way, Royal College Street and Georgiana Street. The public open space would consist of two separate planted areas, one to the north of the main building with an east-west orientation and one in the gap between the two residential buildings, with a north-south orientation. Two large trees would be planted in the central garden, accompanied by smaller trees and low level planting elsewhere across the site. The landscaped areas would also include street furniture and elements designed to encourage informal play. Short-stay cycle parking would also be incorporated within the areas of soft landscaping.
- 6.81. The proposed public open space is well located in the site to be used by all users of the site (i.e. residents, workers, visitors) and it is also well located to provide a new east-west link across the site from St Pancras Way to Royal College Street, including an additional link to Georgiana Street in the north, thereby improving permeability in the wider area and providing pedestrians with more options.



- 6.82. The public open space would be accessible at all times of day (which the legal agreement can ensure remains the case in perpetuity) and it provides informal play opportunities for children without this space (or any of the spaces within the public open space) appearing to relate directly to a specific part of the development. Instead, it is considered that users of the public open space, be they residents, workers or visitors, would feel that they could use any part of the public open space.
- 6.83. The rear door for the market housing block opens onto a pavement adjacent to the central part of the landscaped area and the rear door for the affordable block opens onto a pavement running along the southern edge of the building, with an area of planting directly opposite (to prevent people inadvertently walking into the servicing route). The landscaped area is split into two parts: the main part is in the centre of the site (orientated east-west) and the second part is in the gap between the two residential buildings (orientated north-south), overlooked by a window serving a retail unit in the ground floor of the market block and a window serving the entrance lobby to the affordable block. The "playful elements" are located partly in the north-south area and partly in the east-west area, which also serves to encourage all users of the space to use all parts of the space.
- 6.84. Images submitted with the application demonstrate that there will be clear sight-lines across the area of public open space to maximise natural surveillance and the space would also be well-overlooked by the offices, retail and residential units. This would aid in minimising crime and antisocial behaviour in the space.
- 6.85. Overall, the quality of the public open space is considered to be acceptable and it is considered that the images demonstrate that the landscaped areas would provide a welcome contrast to the adjacent buildings and the area of public open space should feel inviting and draw people in to enjoy the sense of greenery and nature in an otherwise built-up area.

- 6.86. The vehicle servicing route runs adjacent to the area of public open space; however, there would be a clear demarcation between the separate uses, which is important in terms of safety for users of the space. The plans have been revised during the course of the application to avoid creating a route down the side of the building that would end at the vehicle servicing route. It is now considered that the planted areas and the location of the seating areas would discourage people using the space from entering the vehicle servicing route without meaning to. It is also worth noting that the servicing route was a key part of the discussions at the pre-application stage. An alternative proposal was to provide a turntable on Pratt Street to allow vehicles to enter and leave the site from the same location, and thereby limit the impact on the area of public open space. However, a turntable approach is considered to be unsuitable for a number of reasons, including cost and the difficulties involved with managing vehicles wanting to enter and leave the site at the same time. Similarly, any proposals to allow vehicles to enter and leave the site at the same place would be likely to involve a large opening in the building which would be harmful in urban design terms. The proposed servicing route allows vehicles to enter and leave the site at different locations (thereby limiting the impact on one particular street, which is important given the forthcoming cycle lane plans for Pratt Street) and it also should be easy to operate without too much management (i.e. vehicles can drive in and visit different units simultaneously as they would be able to on a normal street, and as they can do at the existing site). It is considered that the proposed servicing arrangement make the replacement industrial units more desirable than they would be with the turntable.
- 6.87. The Design & Access Statement notes that the combination of trees has been chosen to suit the anticipated site conditions, which are likely to be shady and sheltered and also to provide a long season of interest from early spring blossom to strong autumn colour. It is also noted that adequate soil depth will be provided above the basement to accommodate the roots. The Council's Tree Officer and Green Spaces Officer have reviewed the application and are supportive of the proposals. Some recommendations have been made and the proposed details have been revised in response to the comments. For example, the proposed tree species has been amended and further clarification has been provided about ongoing maintenance.
- 6.88. Suitable conditions are recommended to require that full details of all hard and soft landscaping and means of enclosure of all un-built, open areas are submitted to and approved in writing by the Council prior to the commencement of development (condition no.10), and to ensure that the hard and soft landscaping is then carried out in accordance with the approved landscape details prior to the occupation of the relevant uses on site (condition no. 11). A further condition relating to replacement tree planning is suggested and in response to comments from The London Wildlife Trust (see Nature Conservation and Biodiversity section of the report), the condition will require that fruiting species are included in the proposed mix of replacement trees (condition no. 12).
- 6.89. CPG Public Open Space notes that, where developments provide a contribution towards public open space (either on-site or off-site), the Council will need to be satisfied that it will be properly laid out and completed and that suitable

contractual arrangements for its long-term management and maintenance have been put in place. A Landscape Management Plan will be secured by the section 106 legal agreement to ensure that the new open space is properly managed in the future.

6.90. Overall, subject to the suggested conditions and planning obligations the proposals are considered to be acceptable in this respect.

Impact on neighbouring properties

- 6.91. Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy notes that the factors to consider include: visual privacy and outlook; sunlight, daylight and overshadowing; artificial lighting levels; transport impacts; impacts of the construction phase; noise and vibration levels; odour, fumes and dust; microclimate; contaminated land (see separate section on contaminated land); and the impact upon water and wastewater infrastructure (see separate section on flood risk and drainage). Policy A4 also seeks to ensure that noise and vibration is properly controlled and managed.
- 6.92. To the south of the application site (on the other side of Pratt Street) is the Royal Mail car park. At the southern corner of Pratt Street and St Pancras Way is a 5 storey block of residential flats (No. 124 Pratt Street / 49 St Pancras Way) and at the southern corner of Pratt Street and Royal College Street lies the Golden Lion PH.
- 6.93. To the east of the application site, on the other side of St Pancras Way, are residential flats (4, 5, 6 storeys tall) which sit between the road and the canal.
- 6.94. To the north, on Georgiana Street, is the Bangor Wharf site (it is likely that a new application will come in for this site in due course). There is also a residential dwelling (No. 54 Georgiana Street) and the side elevation of No. 118 Royal College Street, which faces west onto Royal College Street.
- 6.95. To the west, on Royal College Street, there is an electricity sub-station site, which presents a blank brick wall to the street.

Visual privacy and outlook

- 6.96. The existing buildings at the site are only two storeys tall and mostly present blank elevations to the surrounding streets, whereas the replacement buildings would range between 5 and 6 storeys (with two additional levels of plant above) and would feature windows on their elevations to serve the different uses. As such, there will be an additional impact on neighbouring properties over and above the existing situation.
- 6.97. Looking first at Pratt Street, the properties on the southern side of the road (the residential block and the pub) would face the southern elevation of the main building. The southern elevation measures 5 storeys tall (it steps down to 4 storeys at Royal College Street and St Pancras Way at either end) and the 6th storey is set back, and two levels of plant above that are set back even further.

Whilst the building would be taller than the buildings on the southern side of Pratt Street, it is not considered that it would appear so overbearing to these properties as to warrant a refusal of the application on this basis. The fact the building is stepped towards the top mitigates the impact on neighbouring properties and both the pub and the residential block would still benefit from a good, uninterrupted outlook towards the north-west and north-east respectively. With regards to the Royal Mail site, it is not considered that the proposed new building would prejudice the future development of that site, nor that it would impact on existing operations at that site.

- 6.98. In terms of visual privacy and overlooking, the southern elevation of the main building would feature windows at all levels, to serve the retail unit and one of the light industrial units at ground level and the office floorspace on the floors above. At ground level, there would also be openings to serve the cycle lobby, an access corridor and a plant room and the vehicle servicing route would be visible. It is not considered that the level of overlooking from the new windows would be unduly harmful to the properties to the south, particularly because the office use at the upper floors would only be likely to be occupied during normal office hours. Nevertheless, some degree of overlooking is expected in a location such as this.
- 6.99. Looking now at St Pancras Way, there are residential flats on the other side of the road (Star Wharf at No. 40 and Knowles Wharf at No. 38), which sit between the road and the canal. Plans held by the Council show that there are some single-aspect units in Star Wharf (the building directly opposite the application site); however, the majority of the flats in the building are dual-aspect or are single-aspect facing towards the canal on the other side of the building. Whilst the replacement buildings at the application site would be taller and closer to the road than the existing, it is not considered that they would appear so overbearing to the properties in Star Wharf as to warrant a refusal of the application on this basis. On its eastern elevation, the main building would be 4 storeys tall, with the 5th and 6th storeys set back and the plant levels set back even further. The residential block at the north-eastern corner of the application site would be 6 storeys tall; however, due to its siting in relation to Star Wharf, it is not considered that this building would appear overbearing, particularly as the individual residential units at this end of Star Wharf benefit from views towards the canal as well as towards the application site.
- 6.100. It is not considered that the new buildings would appear overbearing to the flats at Knowles Wharf (to the south of Star Wharf) due to the siting of the buildings in relation to each other, whereby the new building would mainly be viewed in oblique views and Knowles Wharf would still have a good outlook along Pratt Street.
- 6.101. With regards to visual privacy and overlooking, the eastern elevation of the main building would feature windows to serve the light industrial units at ground level and the office floorspace above. The residential building would also feature windows and balconies on its eastern elevation. However, it is not considered that the level of overlooking from the new windows / balconies would be unduly harmful to the residential units at Star Wharf or Knowles Wharf, particularly

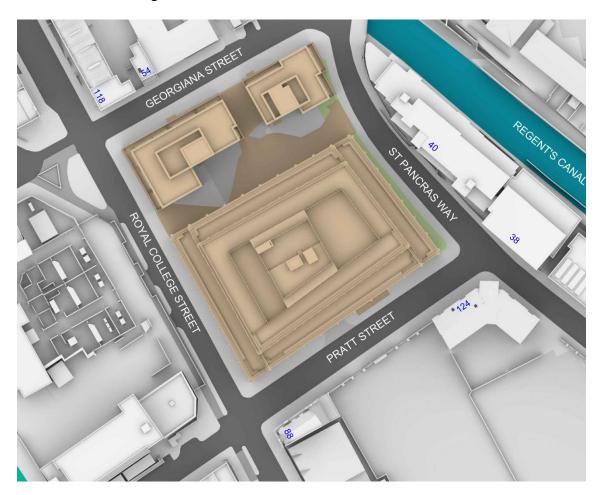
because the office use at the upper floors of the main would only be likely to be during normal office hours and the windows and balconies in the residential block mostly provide views to the north-east towards Gray's Inn Bridge and the canal rather than directly towards Star Wharf.

- 6.102. On Georgiana Street, the northern elevations of the two residential blocks would be visible to the properties on the northern side of the road. The north-eastern block (on the corner of St Pancras Way) would be 6 storeys tall and the north-western block (on the corner of Royal College Street) would be 5 storeys tall. The existing Bangor Wharf buildings are only two storeys tall; however it is likely that a new application will come in for redevelopment of this site in due course. Nevertheless, it is not considered that the proposed new buildings along the northern edge of the application site would be so tall as to prejudice development of that site in the future. Similarly, although there are windows and balconies in the northern elevations of the two buildings it is not considered that the level of overlooking would be so great as to warrant a refusal of the application on this basis. Some overlooking across a street is to be expected in a built-up location such as this.
- 6.103. The main property on Georgiana Street that is likely to be affected is No. 54 Georgiana Street, a two storey residential dwelling which faces south towards the application site. Plans held by the Council illustrate that the property is dual-aspect with windows to the front and rear. The property also benefits from a rear garden, a first floor front roof terrace and a roof terrace above the building.
- 6.104. The side elevation of No. 118 Royal College Street also faces towards the application site. This building has been subdivided into flats and although the full layout of the building is not known, it appears that some of the side-facing windows serve rooms that are not served by other windows.
- 6.105. Although the new buildings at the application site would be taller than the existing, it is not considered that they would appear so overbearing to the properties on Georgiana Street as to warrant a refusal of the application on this basis. The road would provide some separation between the buildings and No. 54 Georgiana Street and No. 118 Royal College Street would still benefit from sideways views to the south-west, towards the crossroads, which is more open in character.
- 6.106. With regards to visual privacy and overlooking, as already noted, some overlooking is to be expected in a built-up location such as this. The level of overlooking is not considered to be so harmful as to warrant a refusal of the application on this basis, particularly as the overlooking would be towards the public sides of the buildings, rather than towards their private sides. It is recognised that No. 54 Georgiana Street has a first floor roof terrace at the front and a roof terrace above the building, which are likely to experience some overlooking; however, due to their locations these terraces are already likely to be overlooked by other properties to some degree and the dwelling benefits from private space at the rear, which would remain unaffected by the proposals.

- 6.107. It is not considered that the electricity sub-station on the other side of Royal College Street would be affected in terms of visual privacy and outlook.
 - Sunlight, daylight and overshadowing
- 6.108. A Daylight and Sunlight Report was submitted with the application and has been updated to incorporate scheme amendments and floorplans for No. 124 Pratt Street. The report has been independently reviewed by Delva Patman Redler (DPR).
- 6.109. The report assesses sunlight and daylight against the guidelines set out in the BRE Report "Site layout planning for daylight and sunlight - A guide to good practice" (hereafter referred to as the BRE guidance). The BRE guidance state that if the Vertical Sky Component (VSC) at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. reduction of more than 20%), the reduction in skylight will be noticeable and the building may be adversely affected. With regard to No-Sky Line (NSL), the guidance states that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. reduction of no more than 20%). For Average Daylight Factor (ADF), the guidance states that acceptable values in the presence of supplementary electric lighting are 1% for a bedroom, 1.5% for a living room and 2% for a kitchen. For Annual Probable Sunlight Hours (APSH), the guidance state that ASPH received at a given window should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. no more than 20% reduction). The BRE guidance states that all main living rooms of dwellings should be checked if they have a window facing within 90 degrees of due south, although kitchens and bedrooms are less important.
- 6.110. The applicant's report highlights the fact that the BRE guidance is not mandatory and should be interpreted flexibly, particularly in cities; and it notes that: "Given the modest massing that currently occupies the application site, any viable redevelopment will involve a substantial increase in density with corresponding noticeable proportional reductions in daylight to some neighbouring properties". The report also points to an appeal decision at Paddington's West End Green where the Inspector concluded that: "A reduction in VSC to less than both 27% and 80% of its former value will be noticeable. 'Noticeable', however, is not to be equated with 'unacceptable'."
- 6.111. The applicant's report proposes that a VSC of 18% is reasonable in built-up urban areas and it also quotes the Mayor of London's Housing Supplementary Planning Guidance Document which states: "The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm." To this end, Point 2

(the authors of the daylight and sunlight report) have produced section drawings measuring the development angle of the ground and first floor windows on the side elevation of No. 124 Pratt Street (i.e. the elevation which faces St Pancras Way) to understand what obstruction angle has already been established within the immediate area. The drawings illustrate that development angles of 54 degrees at ground level (which corresponds to a VSC of 10.3%) and 49 degrees at first floor (which corresponds to a VSC of 13%).

- 6.112. The report then proposes that, taking into consideration established VSC levels in the local area, a VSC target of 15% is appropriate in this case, with some flexibility applied to this target at ground and first floor, where lower VSC levels are already established close by. The report also notes that a 15% VSC target has been considered acceptable on a number of other cases in London, has been endorsed by the GLA as being acceptable, and has been accepted by Planning Inspectors at appeal.
- 6.113. The report assesses the impact on the following properties: 118 Royal College Street, 54 Georgiana Street, 40 St Pancras Way (Star Wharf), 124 Pratt Street and 88 Royal College Street (Golden Lion PH and residential flat above). These are shown in the diagram below.



118 Royal College Street



6.114. At No. 118 Royal College Street, the report notes that the site facing windows all currently receive unusually high levels of VSC, ranging from 30.5% up to 38% and 4 of the windows would experience proportionate VSC reductions of between 25.62% and 39.03%, which BRE guidance suggests could be noticeable. The rooms associated with these windows also experience reductions in NSL which depart from BRE guidance; however, the room layouts are unknown and therefore the report notes that more reliance should be placed on the VSC results. Notwithstanding there are some potentially noticeable reductions in daylight, the windows do, however, retain absolute VSC levels of between 18.8% and 25.7%, which the report notes is good in the context of an urban environment. With regards to sunlight, all site facing rooms within 90 degrees of due south would experience fully BRE compliant changes in APSH.

54 Georgiana Street

6.115. At No. 54 Georgiana Street, the report again notes that the site facing windows all currently receive unusually high levels of VSC (35% & 35.6%) and the windows would experience proportionate VSC reductions of 41.85% and 43.35%, which BRE guidance suggests could be noticeable. The results do not show any reduction in NSL, due to the presence of a skylight. Notwithstanding there are some potentially noticeable reductions in VSC, the windows do, however, retain absolute VSC levels of 18.8% and 19%, which the report notes is good in the context of an urban environment. With regards to sunlight, all site facing rooms within 90 degrees of due south would experience fully BRE compliant changes in APSH.

Star Wharf





- 6.116. At Star Wharf, the report notes that the majority of the windows serving living/kitchen/dining rooms all currently receive unusually high levels of VSC for an urban location, with levels generally upwards of 27%. There is one exception, one of the windows has a tall fence directly in front of it and therefore does not receive good levels of VSC. Eight of the windows would experience fully BRE compliant reductions in VSC and NSL as a result of the proposed development. A further 5 windows serve dual-aspect rooms and although the windows which face the application site would experience reductions in VSC that depart from default BRE guidance, the rooms are complemented by additional window(s) which would not experience any change and would continue to retain an absolute VSC of 27% or above. With regards to NSL, the report notes that the change in daylight distribution would be unnoticeable in every case.
- 6.117. There are 7 windows which would experience reductions in VSC and/or NSL which depart from BRE guidance. Of these 7, the report notes that the reductions to 2 are considered very minor derogations from BRE guidance, with VSC reductions of 21.93% and 27.3% (more than 20% may be noticeable), and the changes in NSL would be only 0.1% and 4%. The remaining 5 windows form a column of single-aspect living/kitchen/dining rooms and the reduction in VSC to these windows ranges from between 33% to 56.39% of their existing value. The reductions in NSL are similar, ranging from 43% to 60% of the existing value. Notwithstanding these noticeable reductions in VSC and NSL, the retained VSC values to the windows run as follows: Ground floor 12.6% and 13.4%; 1st floor 15.1%; 2nd floor 17.9%; 3rd floor 20.8%; 4th floor 23.8%. The report concludes that the retained VSC levels at the 2nd, 3rd and 4th floors would be good for an urban context. The report also notes that the 1st floor retains an absolute VSC which is commensurate with typical urban development and the ground floor windows is broadly comparable to the VSC levels achieved nearby at ground/first floor. The report also notes that the slightly lower figures are influenced by the tall external fence directly in front of one of the windows.
- 6.118. With regards to bedroom windows, a number of bedrooms at Star Wharf would not experience any noticeable change in VSC or NSL as a result of the development and whilst a number of bedrooms would experience some noticeable reductions in daylight, the report concludes that this is acceptable on the basis that the principal rooms retain good levels of daylight and the retained VSC levels would be commensurate with levels already established at Star Wharf.
- 6.119. With regards to sunlight, the report notes that all living/kitchen/dining rooms orientated within 90 degrees due south retain fully BRE compliant levels of total and winter APSH and these rooms would continue to enjoy very good levels of sunlight after construction. Some of the bedrooms would retain APSH levels of 21-22% (compared to the BRE target of 25%); however, the report notes that sunlight to bedrooms is less important as these rooms naturally tend to be used for sleeping.

124 Pratt Street



6.120. At No. 124 Pratt Street, the report notes that all the residential units in the building are dual-aspect with the principal living room on the opposite side of the building facing away from the application site. On the site facing elevation, there are 16 windows that all serve bedrooms. The report notes that the site facing windows all currently receive unusually high levels of VSC for an urban environment (28.56% to 38.57%) and the windows would experience proportionate VSC reductions of between 21.44% and 57.9%, which BRE guidance suggests could be noticeable. Furthermore, 12 of the bedrooms would experience NSL reductions of between 21.7% and 56.3% their existing value, which BRE guidance suggests could be noticeable. Notwithstanding there are some potentially noticeable reductions in VSC and NSL, the windows do, however, retain absolute VSC levels of 12-14% at ground floor, 14-18.5% at first floor and 16-21% at first floor, with results improving floor by floor. The report notes that the levels of retained VSC are commensurate with residential properties in an urban environment and are also comparable to the VSC levels at the windows on the perpendicular elevation (i.e. facing St Pancras Way). With regards to sunlight, none of the site facing rooms have a window orientated within 90 degrees due south and therefore do not need to be assessed.

88 Royal College Street



6.121. At No. 88 Royal College Street (the Golden Lion PH and residential flat above), the report notes that there is no requirement to assess the public house as it is

not residential accommodation. With regards to the flat above the pub, the report notes that the site facing windows all currently receive unusually high levels of VSC; ranging from between 36 to 37%. The windows would experience proportionate VSC reductions of between 29% and 52%, which BRE guidance suggests could be noticeable. The rooms associated with these windows also experience reductions in NSL which depart from BRE guidance; however, the room layouts are unknown and therefore the report notes that more reliance should be placed on the VSC results. The report notes that the windows would retain absolute VSC levels of greater than 18%, which is considered good in the context of an urban environment. With regards to sunlight, all site facing rooms which have a window orientated within 90 degrees due south experience fully BRE compliant changes in APSH.

- 6.122. As noted, the daylight and sunlight report has been independently reviewed by Delva Patman Redler (DPR). DPR do not agree with the lower retained VSC target set by Point 2 as it does not adequately relate to the BRE guidance. However, they suggest that it is open for the decision makers to consider whether this alternative target is acceptable and they note that a retained VSC of 18% would be generally consistent with typical VSC levels in a dense urban location such as this.
- 6.123. The letter from DPR also notes that they believe there will be a major adverse impact on No. 124 Pratt Street as a result of the development due to the low retained VSC levels. However, the sunlight and daylight report was later amended when plans of No. 124 were made available and it is now known that the principal living rooms are on the other side of the building, facing away from the application site and the windows facing the application site serve bedrooms. The impact on bedrooms is considered to be less as these rooms are naturally used for sleeping.
- 6.124. CPG Amenity provides some guidance on assessing sunlight and daylight impacts. It notes that the Council will expect applicants to submit daylight and sunlight reports informed by BRE's guidance; however, it then goes on to note that the intention of the BRE guidance is to provide advice to developers and decision-makers and it should be regarded as a guide rather than policy. Paragraph 3.23 of the CPG notes: "While we strongly support the aims of the BRE methodology for assessing sunlight and daylight we will consider the outcomes of the assessments flexibility where appropriate, taking into account site specific circumstances and context. For example, to enable new development to respect the existing layout and form in some historic areas, it may be necessary to consider exceptions to the recommendations cited in the BRE guidance. Any exceptions will assessed on a case-by-case basis".
- 6.125. The greatest impact will be on the single aspect units at Star Wharf which have high reductions in VSC and relatively low levels of retained VSC. The other properties are either dual-aspect (e.g. 124 Pratt Street) or have retained VSC levels above 18%, which Point 2's report proposes to be reasonable in built up areas. Although BRE guidance states that VSC of less than 27% (and more than 20% its former value) would be noticeable, in this particular case, it is recognised that the existing buildings at the application site are low level and therefore

surrounding properties currently benefit from unusually high levels of VSC. It is also agreed that any redevelopment of the application site is likely to involve an increase in density and height of the buildings. The VSC reductions would be noticeable in a number of cases (although noticeable does not necessarily equate to unacceptable) and the retained VSC levels would also depart from BRE guidance; however, insofar as the retained VSC levels are either commensurate with a typical urban environment (i.e. 18%), or at least commensurate with VSC levels at ground and first floor windows nearby (i.e. 10.3% and 13%) the overall impact is judged to be acceptable, on balance. This is taking into consideration the Mayor's Housing SPG guidance which notes that the degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London; and decision-makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm. In this case, whilst surrounding properties would undoubtedly experience reduced VSC, it is not considered that unacceptable harm would be caused.

6.126. It is also worth stating that although the applicant's report notes that there is no requirement to assess the public house as it is not residential accommodation, the impact on the building is nevertheless considered to be acceptable. It is likely that the pub would experience reductions in VSC, NSL and ADF; however, the windows facing north are already likely to suffer from being north-facing and the pub would still benefit from west facing windows onto Royal College Street. Concerns were raised about the impact on the outdoor seating area as a result of overshadowing; however, this area is already likely to suffer from overshadowing and a lack of light due to its siting against the northern wall of the pub. It is not considered that the additional impact of the proposed new building is sufficient to warrant a refusal of the application on this basis.

Artificial lighting levels

6.127. The sub-text to Policy A1 notes that Camden's dense character means that light pollution can be a bigger problem in the borough than in lower density areas where uses are not so close together. The text notes that artificial lighting should only illuminate the intended area and not affect or impact on the amenity of neighbours. A suitable planning condition is suggested to require full details of the lighting strategy for the public open space and the adjacent buildings to be submitted for approval prior to commencement of above-ground works (condition no. 13).

Transport impacts

6.128. The proposed development would be car-free and although a vehicle servicing route is proposed at the site to serve the light industrial units and for servicing the office floorspace, it is not considered that the level of activity would be so high as to cause undue harm to neighbouring properties over and above the existing situation. In any event, the section 106 legal agreement will secure a

Delivery and Servicing Management Plan, which should minimise harmful impacts on nearby and neighbouring residential properties.

Impacts of the construction phase

6.129. The sub-text to Policy A1 notes that disturbance from development can occur during the construction phase, and measures to reduce the impact of demolition, excavation and construction works should be outlined in a Construction Management Plan (CMP). A draft CMP has been provided with the application (see Transport section of report for further comment). Given the extent of the proposed works and the nature of the application site, the Council will secure a full CMP through the section 106 legal agreement.

Noise, vibration, odour, fumes, dust

- 6.130. Once the construction period has finished, it is not considered that the proposed commercial, retail and residential uses on the site would cause undue harm to neighbouring land uses in terms of noise, vibration, odour, fumes or dust.
- 6.131. Depending on how they are used, the light industrial units have the potential to cause some impacts; however, the applicant has confirmed that the fabric of the building is designed to prevent noise break-out. Nevertheless, suitable conditions are suggested relating to noise and vibration (conditions 3 and 4).
- 6.132. Insofar as the Council would like to encourage existing occupiers to return to the new building if possible, or for other light industrial uses to occupy the spaces if this is not possible, it is not appropriate to place unnecessarily tight controls on the new units, as this may discourage future tenants.

Transport

- 6.133. Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. The policy specifically notes that, in order to promote walking in the borough and improve the pedestrian environment, the Council will seek to ensure that developments: a) improve the pedestrian environment by supporting high quality public realm improvement works; b) make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping; c) are easy and safe to walk through ('permeable'); d) are adequately lit; and, e) provide high quality footpaths and pavements that are wide enough for the number of people expected to use them (features should also be included to assist vulnerable road users where appropriate).
- 6.134. The application site is easily accessible by public transport, with a PTAL rating of 6a (on a scale of 0 to 6b). Camden Town Station (underground) is located approximately 550 metres to the east of the application site and Camden Road Station (overground) is approximately 250 metres to the north. The nearest bus stops within walking distance are on Royal College Street, Bayham Street and

- Plender Street. The closest cycle docking station is at St Martin's Close, approximately 150 metres to the north.
- 6.135. The proposed development would improve the pedestrian environment in the immediate area, particularly as the existing buildings present blank facades to the surrounding streets and do not make any contribution to their surroundings. The proposals would also increase permeability in the area by creating a new pedestrian route through the site, linking St Pancras Way to Royal College Street, with an additional link to Georgiana Street. The new routes would be easy and safe to walk through as they are well-overlooked and, as noted above, a condition is suggested to ensure that full details of the lighting strategy for the public open space are submitted for approval (condition no. 13). It is also considered to be necessary to secure the route through the open space in perpetuity, meaning it can't be blocked off or gated in some way in the future. The section 106 legal agreement can secure this.
- 6.136. In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development provides for and makes contributions towards connected, high quality, convenient and safe cycle routes; provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirement outlined in the CPG; makes provision for high quality facilities that promote cycle usage, including changing rooms, showers, dryers and lockers; and is easy and safe to cycle through ('permeable').
- 6.137. The proposal would provide 17,072 sqm (GEA) of office space, 3,519 sqm (GEA) of light industrial floorspace, 829 sqm (GEA) of retail floorspace, and 33 new residential dwellings. The Draft London Plan requires the following:

Land use	Long-stay	Short-stay	
Business offices	1 space per 75 sqm	First 5,000 sqm: 1 space per 500 sqm. Thereafter: 1 space per 5,000 sqm (GEA)	
Light industrial	1 space per 250 sqm (GEA)	1 space per 1,000 sqm (GEA)	
Retail			
A1	From a threshold of 100 sqm: 1 space per 175 sqm gross external area (GEA)	From a threshold of 100 sqm: First 750 sqm: 1 space per 20 sqm; thereafter: 1 space per 150 sqm (GEA)	
A3	From a threshold of 100 sqm: 1 space per 175 sqm (GEA)	From a threshold of 100 sqm: 1 space per 20 sqm (GEA).	
Dwellings	1 space per studio, 1.5 spaces per 1 bedroom unit,	1 space per 40 units	

2 spaces per all other dwellings	

- 6.138. This equates to a requirement of 228 long-stay spaces for the office, 15 long-stay spaces for the light industrial / storage and distribution, 5 long-stay spaces for the retail and 61 long-stay spaces for the dwellings (26 for the affordable and 35 for market). There is also a requirement for 58 short stay spaces at the site.
- 6.139. The level of provision for the residential units meets the standards and is therefore considered acceptable. The two separate cycle stores (one for the market block and one for the affordable block) would be located at basement level, with lift access from the respective ground floor lobbies.
- 6.140. The level of long-stay provision for the office space exceeds the standards and the Transport Assessment confirms that showers, lockers and changing facilities for staff will also be provided, at a minimum of 2 lockers per 3 long-stay spaces and 1 shower per 10 long-stay spaces, which is welcomed. Additional details on the design of the long-stay cycle parking have been provided and are considered to be acceptable.
- 6.141. No retail or light industrial cycle parking spaces are illustrated on the proposed plans. The 15 spaces for the light industrial space are proposed to be located with the office cycle storage or in the units themselves. However, the cycle storage for separate uses needs to be separate as the uses/buildings will be under separate use and management.
- 6.142. A suitable planning condition is suggested to ensure that the cycle parking facilities for the new dwellings and office space are provided in their entirety prior to the occupation of the residential units / the commencement of the commercial uses (condition no. 14). A further condition is suggested to require that full details of the cycle storage for the separate light industrial and retail units are provided prior to the commencement of the uses (condition no. 15). It is considered that there is adequate space within the building to allow the necessary cycle parking to be accommodated.
- 6.143. With regards to short stay spaces, 28 spaces are provided in two locations on the site, which is considered to be acceptable, and a further 30 spaces are proposed on the public highway on Georgiana Street. These spaces in the public realm are acceptable in principle; however, will be subject to final detailed design of the public highway. The cost for the implementation of short stay cycle spaces is included within the Pedestrian, Cycling and Environment (PCE) contribution.
- 6.144. The carriageway and footway adjacent to the application site is likely to sustain significant damage as a result of the proposed demolition and construction works. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development and therefore a contribution towards highways works will be secured by the section 106 legal agreement. A cost estimate for the highway works has been prepared by the Council's Transport Design Team at a total cost of £249,753.60. This contribution

- will also provide for the proposed public realm changes on the public highway adjacent to the site discussed above, and will be subject to detailed design and consultation.
- 6.145. The proposed development would also introduce a substantial increase in new residential and office related trips to the area (see trip details in following paragraphs). The section 106 legal agreement will also secure a Pedestrian, Cycling and Environmental (PCE) improvements contribution of £460,000, which would be used by the Council alongside contributions secured from other major developments and funding provided by other sources to transform the public realm in the general vicinity of the site for the benefit of cyclists and pedestrians. The contribution would most likely be focussed towards improving cycling and walking routes, thereby helping to encourage residents, staff and visitors to cycle.
- 6.146. Policy T2 of the Local Plan seeks to limit the availability of parking and requires all new development in the borough to be car-free. The section 106 legal agreement will secure all the uses as car-free, meaning that occupiers will not be able to obtain residents and business parking permits.
- 6.147. Disabled parking bays will be provided for the residential development on the public highway on Georgiana Street, while there is another proposed on Pratt Street for the office use. The locations of these bays are acceptable in principle, but will be subject to detailed design and consultation. The provision of the spaces is covered by the highways works which will be secured by the section 106 legal agreement.
- 6.148. There is a vehicle servicing route through the main building. This is acceptable from a general parking point of view, as the shared servicing road will not be used for private parking and will only be used to service the site in accordance with Policy T2. As highlighted above, the servicing route is also considered to represent a good approach to servicing the different uses as it will allow vehicles to enter the site and visit the different units simultaneously (i.e. avoiding the need for a turntable, large turning area or excessive management etc.) and will essentially function as a normal street would do, whilst allowing additional commercial floorspace above and without detracting from the design of the overall scheme. The internal servicing route was discussed during the preapplication discussions and was considered to represent the best approach, taking into account design, transport and public safety considerations etc.
- 6.149. Policy T3 seeks to improve transport infrastructure in the borough. The policy notes that the Council will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects; and protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance.
- 6.150. There are plans for a new cycle route along Pratt Street. Currently, this part of Pratt Street is one-way for eastbound traffic and it is understood that a new westbound protected cycle lane on the southern side of the street would be introduced. The Council's Transport Officers do not consider that the proposed development would prejudice the delivery of a cycle route along this road. There

is sufficient space to accommodate the proposed disabled parking to the north side of the street.

- 6.151. The proposed plans indicate that the building frontage adjacent to Georgiana Street would be pulled back by approximately 0.7 metres. This would, along with minor kerb line buildout and realignment, increases the effective footway width along Georgiana Street to an average of 4.5 metres, with a minimum of 2 metres at pinch points created by the proposed disabled parking bays. This allows for the introduction of disabled bays and public realm improvements including the introduction of short stay cycle parking. The footway is also proposed to be realigned along St Pancras Way adjacent to the site. The parking bays along this section will be re-provided in a way that allows for the introduction of rain gardens and trees. All of the changes proposed to the public highway are subject to detailed design and consultation.
- 6.152. The Council would repave the footway directly adjacent to the site in 'like for like' materials (e.g. artificial stone paving slabs). A Section 38 agreement (Highways Act) between the Council and the land owner will be required, as the Council will adopt these sections of new footway along Georgiana Street and St Pancras Way as public highway. An informative is suggested, stating that the applicant is to enter into a Section 38 agreement with the Council.
- 6.153. The vehicle entrance and exit points to the new servicing street require the introduction of a vehicle exit and crossover on St Pancras Way, and the relocation of the existing vehicle entrance on Pratt Street. The plans have been revised during the course of the application to ensure that replacement tree planting does not have an impact on the width of the carriageway along Pratt Street in order not to prejudice future plans for a cycle route along this street.
- 6.154. Policy T4 seeks to promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road. Developments of over 2,500 sqm likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to: minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads; accommodate goods vehicles on site; and provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments, where appropriate.
- 6.155. The application is accompanied by a Transport Assessment (TA) which includes details of trip generation analysis from the use of TRICS and TRAVL trip generation software for all uses, while a comparison is also made with the existing trips generated by the light industrial /storage and distribution uses. The results predict that that the proposed office development would generate 2233x 2-way trips per day. The assessment also predicts 328 trips (309 in, 18 out) in the AM peak and 328 trips (17 in, 328 out) in the PM peak. The assessment suggests the following modal share:

Walking	8%
Cycling	6%

Public transport	35% Underground 29% Rail 12% Bus
Motorcycles	2%

- 6.156. The results of the assessment suggest that the proposed office development will result in a large increase in the number of trips to the site. The majority of these trips is likely to be via public transport; however, the Council anticipates that a higher modal share for cycling and walking can be achieved via a Travel Plan and the implementation of public realm improvements in the local area to make cycling and walking more attractive to residents, staff and visitors. A Travel Plan and PCE contribution will be secured by the section 106 legal agreement.
- 6.157. The residential trips generated by the 33 new dwellings would not have significant impact on the transport network, with an estimated 16 x 2-way trips in the AM peak and 10 x 2-way trips in the PM peak. Due to the car-free nature of the residential development, it is likely the vast majority of the trips would be done by sustainable modes of transport.
- 6.158. The retail floorspace at the development is split across 3 locations, with the units measuring 250 sqm, 144 sqm and 435 sqm. It is anticipated that the 3 sites will be operated separately, due to their different locations across the site. The TA predicts 187x 2-way trips in the AM peak, 391x 2-way trips in the PM peak and 3898x 2-way trips across the whole day (6am to 9pm). The total amount of estimated trips associated with retail use is significant; however, due to the nature of the uses and the location, it can be assumed that the majority of these trips will be generated locally, either originating from the other uses on the site, from other sites within the area or by those passing by the site on linked trips. The applicant has applied a factor of 25% to be taken from the estimated total trip numbers above, to estimate the number of new trips to the area generated by the retail uses. This represents the trips which are not associated with the uses proposed on the site or trips generated by other sites within the area. This factor gives more realistic trip rate estimates of: 47 x 2-way trips in the AM peak, 94 x 2-way trips in the PM peak and 974 x 2-way trips across the whole day (6am to 9pm).
- 6.159. For the light industrial / storage and distribution floorspace, a survey was carried out for the existing site and compared to estimated trip rates for the proposed site. The existing site survey showed that there were 81 trips in the AM peak, 40 in the PM peak and 775 across the day (6am-9pm), which translates to 84, 41 and 803 trips respectively when the uplift of circa 130sqm in light industrial / storage and distribution use is applied. The TRICS database does not have any comparable sites within London, and therefore the analysis used similar sites from across the country. The analysis estimated a much lower trip rate than the existing site, with trip estimates of: 32 in the AM peak, 22 in the PM peak and 389 across the day. It is considered likely that with the removal of the excess parking spaces within the site (there are currently circa 60 spaces) and the formalisation of the servicing operations via the new servicing road, the trip rate

- will be less than the existing rates as the availability of commuter parking for employees will be removed.
- 6.160. The combined estimated trips for the proposed development for all modes has been calculated to be: 423 x 2-way trips in the AM peak; 458 x 2-way trips in the PM peak and 3709x 2-way trips across the whole day (6am to 9pm). The total estimated trips to and from the site are summarised by land use in the table below:

	Total all-day two-way trips	% (rounded) by land use	
Office	2233	60%	
Light Industrial	389	10%	
Residential	112	3%	
Retail	974	26%	
Total	3709	100%	

- 6.161. Approximately 6% (circa 200) of the total number of trips will be by motor vehicle, the vast majority (circa 180) of which are goods vehicles associated with the light industrial / storage and distribution, office and retail uses across the whole day. Most of the trips will be made by foot, bike or public transport, which are sustainable forms of transport.
- 6.162. A draft Travel Plan has been submitted with the application, which is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. The section 106 legal agreement will secure a Strategic Level Travel Plan (and associated review fee) for the office use and a Local Level Travel Plan (and associated review fee) for the light industrial and retail uses. These will focus on the relative impacts of the uses as appropriate.
- 6.163. As noted, there are currently 60 car parking spaces at the site which are used for both loading/unloading and parking. The proposed development includes a vehicle servicing route running through the main building, accessed from Pratt Street and exiting to St Pancras Way. The entrance to the servicing street will be gated at both ends, and the gates closed outside of the hours of operation; however this would not affect pedestrian routes across the site. The layout of the servicing street enables vehicles to be able to enter and leave the site in forward gear. The width of the servicing street also enables vehicles to load/unload outside of the light industrial units while providing adequate space for vehicles to move past stationary loading vehicles. There is space within the designated loading area to accommodate 5 light goods vehicles (LGVs) at any one time, or 4 larger 7 metre long servicing vehicles, while still allowing for vehicles to move past those loading/unloading along the servicing corridor.
- 6.164. A Delivery and Servicing Plan has been submitted in support of the application, which estimates the completed development would generate an average of 188 deliveries per day, approximately 125 of which are associated with the light industrial / storage and distribution use. The remaining are associated with the office and retail use, with very few attributed to residential. All delivery vehicles, refuse and recycling collections associated with the office, light industrial / storage and distribution and residential uses are proposed to be accommodated

- within the servicing corridor. The remaining smaller deliveries and refuse collection associated with the residential development are estimated to be very low frequency (1-2 per day) and will take place from Georgiana Street.
- 6.165. It is considered that the servicing related trips should have a negligible impact on the surrounding highway network as long as they are managed effectively. To ensure that deliveries, refuse and recycling collections and other servicing vehicles do not have a severe impact on the area, a Delivery and Servicing Management Plan will be secured by the section 106 legal agreement. The Delivery and Servicing Management Plan will need to make it clear that all vehicles servicing the site must meet the 4 metres height restriction and no vehicles servicing the retail, light industrial / storage and distribution or office uses of the development are to use the surrounding public highway to load/unload.
- 6.166. Construction Management Plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). The Council's primary concern is public safety but it is also important to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A draft CMP has been submitted with the application and whilst it provides useful information, it lacks detail as a principal contractor has not been appointed. The section 106 legal agreement will secure a full CMP (and associated monitoring fee). The final CMP will also address the potential impact on cyclists and pedestrians during the construction period and present suitable mitigation measures.
- 6.167. The proposals involve basement excavations in close proximity to the public footway adjacent to the site. The Council must ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations. As such, the section 106 legal agreement will also require the applicant to submit Approval In Principle (AIP) reports to the Council's Highways Structures & Bridges Team within Engineering Service for approval prior to the works being carried out.

Waste and recycling

- 6.168. Policy CC5 of the Local Plan seeks to make Camden a low waste borough. The policy aims to reduce the amount of waste produced in the borough and increase recycling. It also aims to ensure that developments include facilities for the storage and collection of waste and recycling.
- 6.169. The proposal includes waste and recycling storage facilities for all the separate uses. In the residential blocks, the bin stores are located at ground level, with access from the communal corridor and with an external door to Georgiana Street. The applicant notes that there is space for refuse, recycling, bulky items, electrical and electronic waste, food waste and textiles. They note that the bin

- stores have been based on Council guidelines for buildings with up to 20 units and therefore in the affordable block (14 units) there is an overprovision of space.
- 6.170. The bin store to serve the office building is located at ground level with access from an internal corridor and an external door to the vehicle servicing corridor. Retail waste will be stored in each individual unit for those units in the north-western block and shared with the office bin store for the unit in the main block. Light industrial / storage and distribution waste will be stored in each individual unit as the type of waste of likely to vary depending on the tenant.
- 6.171. Waste from the office, light industrial / storage and distribution and retail uses will be collected using the internal servicing corridor and the applicant has confirmed that a refuse collection provider will be selected who can operate within the 4 metre height limitation. Residential bin collection will be carried out from Georgiana Street.
- 6.172. Overall, the proposals for waste and recycling storage are considered to be acceptable. A Delivery and Servicing Management Plan will be secured by the section 106 legal agreement, which will ensure that proper measures remain in place. The Landscape Management Plan will cover fly litter and waste dumping at the site.

Energy and Sustainability

- 6.173. The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and assess the feasibility of decentralised energy and renewable energy technologies. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures. The draft London Plan requires that development proposals make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy).
- 6.174. The application is accompanied by a Sustainability and Energy Statement and additional information has been provided during the course of the application. In terms of being lean, the proposals involve the use of Air Source Heat Pumps (ASHP) as well as solar thermal hot water and solar PV, which combined with an efficient design should achieve a site-wide carbon reduction of 41.1%. The commercial elements on their own achieve a 38.5% reduction (against a target of 35%) and the residential elements on their own achieve a 55.3% reduction (against a target of 100%).
- 6.175. Where the London Plan carbon dioxide reduction targets cannot be met on-site, CPG Energy Efficiency and Adaptation notes that the Council may accept the provision of carbon reduction measures elsewhere in the borough, or secure a financial contribution to Camden's Carbon Offset Fund (charged at £60 / tCO2 / year over a 30 year period), which would be used to secure the delivery of carbon

- reduction measures elsewhere in the borough. A carbon offset payment of £32,040 will be secured by the section 106 legal agreement.
- 6.176. Overall, the development achieves a 29.8% reduction in carbon through renewables, which exceeds the minimum requirement of 20%.
- 6.177. Suitable conditions are recommended to require further details of the ASHP and solar PV, as final details are not available at this point (condition nos. 21 and 17 respectively).
- 6.178. In terms of being clean, in line with the London Plan, all major developments are required to demonstrate that the proposed heating and cooling systems have been selected in accordance with the following order of preference: connection to an existing heating or cooling network; site wide CHP network; communal heating and cooling. It has been demonstrated that connection to a heat network is not possible at the current time but a possible space in the basement has been identified with would enable connection at a future date. A single energy centre is not feasible because each of the three blocks will be managed separately; however, both residential blocks are served via communal heating, cooling and domestic hot water systems within each building.
- 6.179. In terms of being green, solar panels are proposed on the roofs and the application proposes the use of air source heat pumps (ASHP).
- 6.180. Policy CC2 encourages the use of bio-diverse roofs where appropriate. The Sustainability and Energy Statement notes that: "Biodiverse roofs with a combination of extensive green roof planting and aggregate habitat will be installed at top levels of all buildings. Solar thermal panels are also proposed to be installed on the roof of the residential blocks and PV panels at the office block. Plant species will be carefully selected and integrated with this equipment. By varying the habitat provision from planted areas to aggregate areas for self-seeding and natural plant colonisation, a diverse and low-maintenance roofscape will be created." Additional details of the green roofs have been provided, including details of their construction, materials used and planting details etc. A suitable planning condition will ensure that the green roofs are installed prior to the first occupation of the buildings (condition no. 18).
- 6.181. With regards to sustainable construction methods, the application is targeting BREEAM Excellent. The sustainability measures will be secured by the section 106 legal agreement (minimum credit targets of Energy 60%, Materials 40% and Water 60%).
- 6.182. Policy CC3 requires developments to reduce their water consumption, pressure on the combined sewer network and the risk of flooding. Details have been provided to demonstrate that greywater harvesting is not feasible; however, the development would not exceed 110 litres per person per day, and a suitable condition is suggested to ensure this (condition no. 19). (SuDS are discussed in the Flood Risk and drainage section of the report).

Nature conservation and biodiversity

- 6.183. Policy A3 of the Local Plan aims to support the London Biodiversity Strategy and the Camden Biodiversity Action Plan (BAP) by ensuring that Camden's growth is accompanied by a significant enhancement in the borough's biodiversity. The policy expects developments to incorporate trees and vegetation wherever possible. The policy notes that the Council will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.
- 6.184. The application is accompanied by an Ecology Report, which notes that the application site does not form part of any statutory or non-statutory nature conservation site and the site is dominated by buildings and hardstanding with smaller areas of introduced shrub, amenity grassland, and mostly immature and non-native species of scattered trees. All the habitats are of low ecological value.
- 6.185. The Design & Access Statement highlights that the office building has large roof terraces at levels 5 and 6 and lush planting on these terraces will help to create a valuable amenity space as well as softening the building and increasing biodiversity at the site. The Design & Access Statement also highlights that the roofs to the core and plant spaces at levels 6 and 7 will perform three main roles: a site for solar PV panels; sedums and/or wildflower planting to provide for birds and insects; and rainwater storage. The new area of public open space in the centre of the site will also increase biodiversity levels at the site.
- 6.186. The London Wildlife Trust have reviewed the application and they conclude that the information provides a good general description of the nature of the site and how the proposed development would improve biodiversity. The London Wildlife Trust are also broadly supportive of the types of replacement trees proposed as they note that the existing trees which will be lost are predominantly fruiting species (Hawthorn, Rowe, pear, cherry, apple) which provide foraging habitats for wildlife, particularly birds, and the proposed replacement trees at street level would be big, long-lived trees that would provide better structure (canopy cover) than the existing trees. However, this does not compensate for the loss of food source and therefore a suitable condition is suggested to ensure that fruiting species are included in the proposed mix of replacement trees (condition no. 12).
- 6.187. Planning conditions are also suggested relating to the provision of bird and bat boxes on-site, details of hard and soft landscaping and the provision of the biodiverse roofs (condition nos. 20, 10 and 18 respectively).
- 6.188. Overall, subject to the suggested conditions, the scheme is considered to be acceptable in terms of nature conservation and biodiversity.

Flood risk and drainage

6.189. Policy CC3 of the Local Plan seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. A Flood Risk Assessment has been provided with the application. The Basement Impact

- Assessment also considers the impact on water conditions in the area. Additional details have also been provided during the course of the application.
- 6.190. With regards to surface water flood risk, the application site is within an area of very low flood risk (<1 in 1000 years). Areas of low medium risk are present within Royal College Street to the south-west of the site, increasing to low high risk within Pratt Street. These areas are confined to the carriageway and do not enter the site.
- 6.191. With regards to Local Flood Risk Zones, the application site is within Group3_003 Critical Drainage Area and is just outside the closest Local Flood Risk Zone (King's Cross) and approximately 750 metres from Primrose Hill Local Flood Risk Zone.
- 6.192. The application site is in a location where there is the opportunity for bespoke infiltration SuDS.
- 6.193. Major developments are expected to achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in run-off rates. The Flood Risk Assessment states that greenfield run-off rates will be achieved; however, no calculations were initially provided to support this statement. The calculations have since been provided and reviewed by the Council's Sustainability Officer who is satisfied with them.
- 6.194. Policy CC3 encourages the use of SuDS in line with the London Plan's drainage hierarchy to achieve a greenfield run-off rate where feasible. SuDS are proposed in the form of an attenuation tank, blue roofs and tree pits. A suitable condition (condition no. 30) is suggested to require full details of the SuDS (including a total of 585 sqm of blue roofs, SuDS tree pits, SuDS rain gardens and a buried attenuation tank) prior to the commencement of development.
- 6.195. Development in areas known to be at risk of surface water flooding should be designed to reduce the risk of flooding in the site and surrounding areas as a result of development, and to cope with being flooded. The applicant has provided a drawing showing the exceedance routing of the site showing no adverse risk within the site or off-site, and any mitigation required to reduce the risk, which is welcomed.
- 6.196. Thames Water have commented on the application noting that they have identified an inability of the existing water network infrastructure to accommodate the needs of the development proposal. They have suggested a number of conditions to ensure that sufficient capacity is made available, prevent damage to existing water infrastructure and to require the submission of a piling method statement, which are all attached to the draft decision notice (condition nos. 22, 23 and 24).

Air quality

- 6.197. Policy CC4 of the Local Plan seeks to ensure that the impact of development on air quality is mitigated and to ensure that exposure to poor air quality is reduced in the borough. The application site is located in an area of poor air quality.
- 6.198. An Air Quality Assessment was submitted with the application which describes the potential air quality impacts associated with the proposed development. The assessment notes that the construction works will give rise to dust impacts and therefore it will be necessary to minimise dust emissions. The assessment notes that the proposed development will result in a reduction in traffic flows on local roads relative to the current use of the site, which means there will be no air quality impacts at existing properties. The report also notes that air quality conditions for the new residents of the proposed development have been considered and pollutant concentrations will be below the relevant air quality objectives at the proposed development, which means air quality conditions for future residents will be acceptable.
- 6.199. The report concludes that the construction and operational air quality effects of the development are judged to be 'not significant' and the proposed development has also been shown to meet the London Plan's requirement that new developments are at least 'air quality neutral'.
- 6.200. The conclusions in the Air Quality Assessment are reliant on future predictions and therefore do not represent the worst case scenario of no improvement on the current emissions, as recommended by CPG Air Quality which guides that "Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations)." However, as the proposals are for Mechanical Ventilation with Heat Recovery (MVHR) from roof level this should ensure good indoor air quality for occupants, details of which can be secured through a suggested condition. A suitable condition is suggested to require full details of the MVHR to be submitted to and approved in writing by the local planning authority prior to the commencement of above-groundworks (condition no. 16).
- 6.201. Mitigation measures to control construction related air quality impacts can be included within the CMP, which will be secured as part of the section 106 legal agreement. This is due to a medium risk of dust during demolition and earthworks and a high risk during construction and trackout. Suitable conditions are also suggested to require that air quality monitoring is implemented on site (condition no. 25), and that all non-road machinery of net power between 37kW and 560kW used on the site for the entirety of the demolition and construction phase of the development be required to meet Stage IIIA of EU Directive 97/68/EC (condition no. 26).
- 6.202. Overall, subject to the suggested conditions and planning obligations, the proposal is considered to be acceptable in this respect.

Contaminated land

6.203. Policy A1 of the Local Plan requires consideration to be made of contaminated land. The sub-text notes that development on contaminated land can expose

people to a wide range of potential health risks. The Council will expect proposals for the redevelopment of sites that are known to be contaminated, have the potential to be contaminated, or are located in close proximity to such sites to submit relevant assessments and take appropriate remedial action to the Council's satisfaction if required.

- 6.204. A Contaminated Land Assessment has been submitted with the application. It notes that historical maps dating back to 1873 illustrate that the land was formerly residential properties and was redeveloped into an electricity generating station in the 1950s. By the 1960s/70s it was recorded as a depot and works before being redeveloped again in the 1980s to the existing light industrial units. The wider area has a mix of residential and industrial with railway sidings, engine houses, factories, goods depots and garages all recorded nearby.
- 6.205. The Council's Contaminated Land Officer has reviewed the application and has raised a number of queries, which have been addressed by the applicant throughout the course of the application. The application is now considered to be acceptable, subject to planning conditions to require that an asbestos survey is carried out if an up-to-date asbestos register is not available (condition no. 28); and to ensure that suitable remediation works are undertaken for any contamination found on site (condition no. 29).

Basement

- 6.206. Policy A5 of the Local Plan notes 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.
- 6.207. The policy goes on to note that, in determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and, where appropriate, a Basement Construction Plan.
- 6.208. The policy sets out various criteria that basement development should accord with, but then notes that exceptions may be made on large comprehensively planned sites.
- 6.209. A single level basement covers the majority of the site. All 5 of the light industrial / storage and distribution units have basements. The rest of the basement provides for cycle storage (office and residential), an attenuation tank (below the area of public open space), rainwater harvesting and potable cold water tank rooms and other plant rooms and storage etc. The proposed basement would not manifest itself above ground at all (e.g. through the use of lightwells or skylights etc.)
- 6.210. The following underground development constraints apply at the application site: slope stability; subterranean (groundwater) flow. The application is accompanied

- by a Basement Impact Assessment (BIA), which has been amended during the course of the application and independently audited by Campbell Reith, in line with the requirements of CPG Basements.
- 6.211. Campbell Reith have raised some additional queries on the updated BIA documents, which the applicant is in the process of addressing; however, the information provided thus far is adequate to demonstrate that the impact of the development would be acceptable in terms of Policy A5.
- 6.212. Campbell Reith have indicated that a Basement Construction Plan (BCP) (to be secured by the section 106 legal agreement) may be required if a satisfactory ground movement / building damage assessment is not provided. (An update will be provided at committee in this respect). A suitable planning condition is also suggested to ensure that a suitably qualified engineer is appointed to oversee the works and that details of the engineer are submitted for approval (condition no. 27).

Section 106 legal agreement and Community Infrastructure Levy (CIL)

Section 106 legal agreement

- 6.213. As outlined in the report above, the following planning obligations are required to satisfactorily mitigate the specific impacts of the development on the wider area:
 - Affordable workspace
 - Employment and Training Strategy
 - Package of end-use employment and training obligations
 - Employment and training contribution (£399,927.465)
 - Affordable housing secured on site
 - Public open space contribution (£248,186.60)
 - Route through open space to be left open at all times
 - Landscape Management Plan
 - Car-free (residential and commercial)
 - Construction Management Plan (CMP)
 - CMP monitoring fee (£22,816)
 - Pedestrian, Cycle and Environment contribution (£460,000)
 - Highways works contribution (£249,753.60)
 - Strategic Level Travel Plan for office use
 - Strategic Level Travel Plan review fee (£9,618)
 - Local Level Travel Plan for light industrial and retail use
 - Local Level Travel Plan review fee (£4,809)
 - Delivery and Servicing Management Plan
 - Approval in Principle (AIP)
 - AIP review fee (£1,800 per request)
 - Sustainability plan
 - Carbon offset contribution (£32,040)
 - Energy plan
 - Basement Construction Plan

- 6.214. The proposal will be liable for the Mayor of London's CIL (MCIL2). The MCIL2 rate is £80 per square metre for all developments other than office, retail and hotels in Central London (which this is not).
- 6.215. The proposal will also be liable for the Camden CIL. The application site is in charging Zone B. The Camden CIL rate for residential development of 10 or more dwellings in Zone B is £250 per square metre; the rate for retail development is £25 per square metres; the rate for office development is £25 and there is no charge for industrial development.
- 6.216. Based on the information provided, the CIL is likely to be £3,391,860 see table below for breakdown).

	(sqm)	MCIL	Camden CIL	Total
Residential	4,035	4,035 x 80 = £322,800	4053 x 250 = £1,008,750	£1,331,550
Office	16,345	16345 x 80 = £1,307,600	16345 x 25 = £408,625	£1,716,225
Retail	765	765 x 80 = £61,200	765 x 25 = £19,125	£80,325
Light industrial	3,297	3297 x 80 = £263,760	3297 x 0 = 0	£263,760
TOTAL	24,442	£1,955,360	£1,436,500	£3,391,860

- 6.217. The figure above is indicative and is subject to change as it does not take into account demolition credit or social housing relief.
- 6.218. CIL payments will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment. CIL charges are subject to indexation in line with the construction costs index.

7. CONCLUSION

7.1. The principle of development is considered to be acceptable. The light industrial floorspace would be re-provided and the provision of office and retail floorspace and 33 new residential units is also welcomed as housing is the priority land use of the Local Plan. The proposals would provide 50% affordable housing, in line with policy, and the proposed tenure mix and dwelling sizes is welcomed by the Council's Housing team. The residential accommodation is considered to provide high quality homes. The new buildings and public open space are considered to be well designed and it is considered that the proposals would contribute to an improvement in the local environment. The application is also considered to be acceptable in terms of the impact on neighbouring land uses,

transport considerations, waste and recycling, energy and sustainability, nature conservation and biodiversity, flood risk and drainage, air quality, contaminated land and basement considerations.

8. RECOMMENDATION

- 8.1. It is recommended to grant conditional planning permission subject to a Section 106 legal agreement covering the following Heads of Terms; and referral to the Mayor of London for his direction:
 - Affordable workspace
 - Employment and Training Strategy
 - Package of end-use employment and training obligations
 - Employment and training contribution (£399,927.465)
 - · Affordable housing secured on site
 - Public open space contribution (£248,186.60)
 - Route through open space to be left open at all times
 - Landscape Management Plan
 - Car-free (residential and commercial)
 - Construction Management Plan (CMP)
 - CMP monitoring fee (£22,816)
 - Pedestrian, Cycle and Environment contribution (£460,000)
 - Highways works contribution (£249,753.60)
 - Strategic Level Travel Plan for office use
 - Strategic Level Travel Plan review fee (£9,618)
 - Local Level Travel Plan for light industrial and retail use
 - Local Level Travel Plan review fee (£4,809)
 - Delivery and Servicing Management Plan
 - Approval in Principle (AIP)
 - AIP review fee (£1,800 per request)
 - Sustainability plan
 - Carbon offset contribution (£32,040)
 - Energy plan
 - Basement Construction Plan

9. LEGAL COMMENTS

9.1. Members are referred to the note from the Legal Division at the start of the Agenda.

10. CONDITIONS AND REASONS

1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2 The development hereby permitted shall be carried out in accordance with the following approved plans: 477-CSJ-00-ZZ-SI-A-0001-S1-P02; 477-CSJ-00-GF-SI-A-0002-S1-P02; 477-CSJ-00-GF-SI-A-0003-S1-P01; 477-CSJ-00-GF-SI-A-0003-S1-P01; 477-CSJ-00-GF-FP-A-0100-S1-P02; 477-CSJ-00-M1-FP-A-0101-S1-P01; 477-CSJ-00-ZZ-EL-A-0300-S1-P01; 477-CSJ-00-ZZ-EL-A-0301-S1-P01; 477-CSJ-00-ZZ-EL-A-0302-S1-P01; 477-CSJ-00-ZZ-SC-A-0200-S1-P02; 477-CSJ-00-GF-SI-A-2000-S1-P02: 477-CSJ-A1-ZZ-DE-A-7030-S1-P01: 477-CSJ-00-B1-FP-A-3101-S1-P02: 477-CSJ-00-GF-FP-A-3102-S1-P05; 477-CSJ-00-M1-FP-A-3103-S1-P02; 477-CSJ-00-01-FP-A-3104-S1-P02; 477-CSJ-00-02-FP-A-3105-S1-P02; 477-CSJ-00-03-FP-A-3106-S1-P02; 477-CSJ-00-04-FP-A-3107-S1-P02; 477-CSJ-00-05-FP-A-3108-S1-P02; 477-CSJ-00-06-FP-A-3109-S1-P02; 477-CSJ-00-07-FP-A-3110-S1-P02; 477-CSJ-00-ZZ-EL-A-3300-S1-P02; 477-CSJ-00-ZZ-EL-A-3301-S1-P02; 477-CSJ-00-ZZ-SC-A-3200-S1-P02; 477-CSJ-00-ZZ-SC-A-3201-S1-P02; 477-CSJ-00-ZZ-SC-A-3202-S1-P02; 477-CSJ-00-ZZ-SC-A-3203-S1-P02; 477-CSJ-00-ZZ-SC-A-3204-S1-P02; 477-CSJ-A1-01-FP-A-5202-S1-P01; 477-CSJ-C1-ZZ-DE-A-7001-S1-P02; 477-CSJ-C1-ZZ-DE-A-7002-S1-P02; 477-CSJ-C1-ZZ-DE-A-7003-S1-P02; 477-CSJ-C1-ZZ-DE-A-7004-S1-P02; 477-CSJ-C1-ZZ-DE-A-7005-S1-P02; 477-CSJ-C1-ZZ-DE-A-7006-S1-P02; 477-CSJ-M1-ZZ-DE-A-7020-S1-P02; 477-CSJ-M1-ZZ-DE-A-7021-S1-P02: 477-CSJ-M1-ZZ-DE-A-7022-S1-P02: 477-CSJ-A1-GF-SK-A-081-S1-C: 477-CSJ-M1-GF-SK-A-071-S1-C; SP108_00_ET Rev P1; SP108_01_GP Rev P3; SP108_02_GM Rev P3; SP108_03_RF Rev P3; SP108_11_01 rev P2; SP108_12_02 Rev P3; SP108_31_PP Rev P2; SP108_32_PT Rev P1; SP108_51_A1 Rev P2; SP108 51 A2 Rev P2; SP108 52 BB Rev P2; SP108 53 CD Rev P2; SP108_54_EF P1; P2; SP108_61_RT SP108_SK15_ET; Rev Rev SP108 JCLA 191114; Archaeological Assessment (August 2019); Affordable Housing Statement (August 2019); Air Quality Assessment (August 2019); Arboricultural Impact Assessment (August 2019); Construction Management Plan (August 2019); Daylight and Sunlight Assessment (amended October 2019); Delivery and Servicing Plan (August 2019); Ecology Report (August 2019); Flood Risk Assessment (August 2019); Noise, Vibration and Ventilation Assessment (August 2019); Planning Statement (August 2019); Planning Statement Addendum (October 2019); Proposed Area Schedule (5 August 2019); Design & Access Statement (August 2019); Statement of Community Engagement (August 2019); Contaminated Land Assessment (August 2019); Interim Report by soiltechnics (22/10/2019); Sustainability and Energy Statement (August 2019); Sustainability and Energy Statement - Response to Greater London Authorities (GLA) comments (25 October 2019); Sustainability and Energy Statement - Response to Camden Council's comments (25 October 2019); Response to Planning Application Comments (October 2019); Response to Greater London Authority Water & Green Infrastructure Memo Stage 1 - Final (12/11/2019); Noise Impact Assessment Report (23 October 2019); Transport Assessment (August 2019); Supplementary Transport Assessment Note (25 November 2019); Servicing Management Plan (August 2019); Waste Strategy Response (undated); Tree Strategy Statement (amended 07/08/2019); Townscape, Visual Impact and Heritage Assessment (August 2019); Basement Impact Assessment Rev D (09/12/2019); Proposed Tree Matrix (SP108 Doc01 TM Rev P3) (28.11.19).

Reason: For the avoidance of doubt and in the interest of proper planning.

The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of Policies A1 and A4 of the London Borough of Camden Local Plan 2017.

4 Prior to use, plant or equipment and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

The noise level in residential rooms at the development hereby approved shall meet the noise standard specified in BS8233:2014 for internal rooms and external amenity areas.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration, in accordance with the requirements of Policies A1 and A4 of the London Borough of Camden Local Plan 2017.

Units M_01_01, M_01_02, M_01_03, M_01_05, A_01_01, A_01_02, A_01_03, M_02_01, M_02_02, M_02_03, M_02_04, M_02_05, A_02_01, A_02_02, A_02_03, M_03_01, M_03_02, M_03_03, M_03_04, M_03_05, A_03_01, A_03_02, A_03_03, M_04_01, M_04_02, M_04_03, M_04_04, A_04_01, A_04_02, A_04_03 and A_05_01 as indicated on the plans hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2), evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation.

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of Policy H6 of the Camden Local Plan 2017.

7 Units M_01_04 and A_05_02 as indicated on the plans hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (3). Evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation.

Reason: To ensure that the wheelchair units would be capable of providing adequate amenity in accordance with Policy H6 of the Camden Local Plan 2017.

- 8 Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:
 - a) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site).

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of Policy D1 of the London Borough of Camden Local Plan 2017.

9 No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of Policy D1 of the London Borough of Camden Local Plan 2017.

No development shall take place until full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3 and D1 of the London Borough of Camden Local Plan 2017.

All hard and soft landscaping works shall be carried out in accordance with the approved landscape details prior to the occupation for the permitted use of the development or any phase of the development, whichever is the sooner. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3 and D1 of the London Borough of Camden Local Plan 2017.

Prior to the end of the next available planting season, replacement tree planting shall be carried out in accordance with details of replanting species, position, date and size, where applicable, that have first been submitted to and approved by the local planning authority in writing. Fruiting species shall be included in the proposed mix of replacement trees.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area, in accordance with the requirements of Policies A2, A3 and D1of the London Borough of Camden Local Plan 2017.

Prior to the commencement of above-ground works, details of a lighting strategy for the site shall be submitted to and approved in writing by the local planning authority. Such details shall include lighting to serve the public open space, and the entrances to the buildings.

The approved scheme shall be implemented as part of the development and thereafter retained and maintained.

Reason: To maintain a high quality of amenity and a safe environment, in accordance with Policies D1 and A3 of the Camden Local Plan 2017.

14 Before the relevant uses commence, details of secure and covered cycle storage areas for the individual retail (5 spaces) and light industrial units (15 spaces) shall be submitted to and approved by the local planning authority. The approved facilities shall thereafter be provided in their entirety prior to the first occupation of any relevant units, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

The approved cycle storage facilities for the residential (26 for the affordable block and 35 for the market block) and office uses (228 spaces) shall be provided in their entirety prior to the first occupation of any of the new residential units / commencement of the commercial uses (as appropriate), and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of Policy T1 of the Camden Local Plan 2017.

Prior to commencement of above-ground development full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads, any kitchen extracts or other pollution sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4.

17 Prior to commencement of above ground works, drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of Policy CC1 of the London Borough of Camden Local plan Policies.

The biodiverse roofs hereby approved shall be fully installed on the building(s) prior to their occupation.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with Policies A3 and CC3 of the Camden Local Plan 2017.

19 The development hereby approved shall achieve a maximum internal water use of 110litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.

Prior to first occupation of the development a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.

Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.

21 Prior to commencement of above ground works, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a metering details including estimated costs to occupants and commitment to monitor performance of the system post construction. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of Policy CC1 of the London Borough of Camden Local plan Policies.

No properties shall be occupied until confirmation has been provided that either: all water network upgrades required to accommodate the additional flows from the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development, in accordance with the requirements of Policy CC3 of the Camden Local Plan 2017.

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. In accordance with the requirements of Policy CC3 of the Camden Local Plan 2017.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. In accordance with the requirements of Policy CC3 of the Camden Local Plan 2017.

- 25 Air quality monitoring should be implemented on site. No development shall take place until
 - a. prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance:
 - b. prior to commencement, evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date.

The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of Policies A1, A4 and CC4 of the Camden Local Plan 2017.

All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the [demolition and/construction] phase of the development.

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies G1, A1, CC1 and CC4 of the London Borough of Camden Local Plan 2017.

The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of Policies D1 and A5 of the London Borough of Camden Local Plan 2017.

Evidence must be provided that the site buildings were built post 2000, or an intrusive pre-demolition and refurbishment asbestos survey in accordance with HSG264 supported by and appropriate mitigation scheme to control risks to future occupiers shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development.

The scheme as submitted shall demonstrably identify potential sources of asbestos contamination and detail removal or mitigation appropriate for the proposed end use. Detailed working methods are not required but the scheme of mitigation shall be independently verified to the satisfaction of the LPA prior to occupation.

Reason To protect future occupiers of the development from the possible contamination arising in connection with the buildings on the site in accordance with policies A1, C1 and CC5 of the London Borough of Camden Local Plan 2017.

- Prior to the commencement of work for each section of the development or such other date, or stage in the development as may be agreed in writing by the Local Planning Authority (LPA) a scheme including the following components to address the risk associated with site contamination shall be submitted to and approved in writing by the LPA.
 - A) A refined Conceptual Site Model of plausible Pollution Linkages pre remediation.
 - B) A remediation strategy giving full details of the remediation measures required and how they are to be undertaken;
 - C) A verification report providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete.

Any investigation and risk assessment must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11). In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported in writing immediately to the LPA.

For the avoidance of doubt, this condition can be discharged on a section by section basis.

Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.

Prior to commencement of development, full details of the sustainable drainage system including a total of 585 sqm blue roofs, SuDS tree pits, SuDS rain gardens and a buried attenuation tank, shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and shall demonstrate the run off rates approved by the Local Planning Authority.

Details shall include the proposed

- lifetime maintenance plan for each element;
- methods to improve water quality on the site;
- construction sequence, including mitigation methods in the event of groundwater level breach:

and systems shall thereafter be retained and maintained in accordance with the approved details.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.

11. INFORMATIVES

- This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
- 2 All works should be conducted in accordance with the Camden Minimum Requirements a copy is available on the Council's website at https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319 or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)

Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.

This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.

4 Thames Water Informatives:

Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above near our pipes or other structures. https://developers.thameswater.co.uk/Developing-a-largesite/Planning-yourdevelopment/Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk

Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes

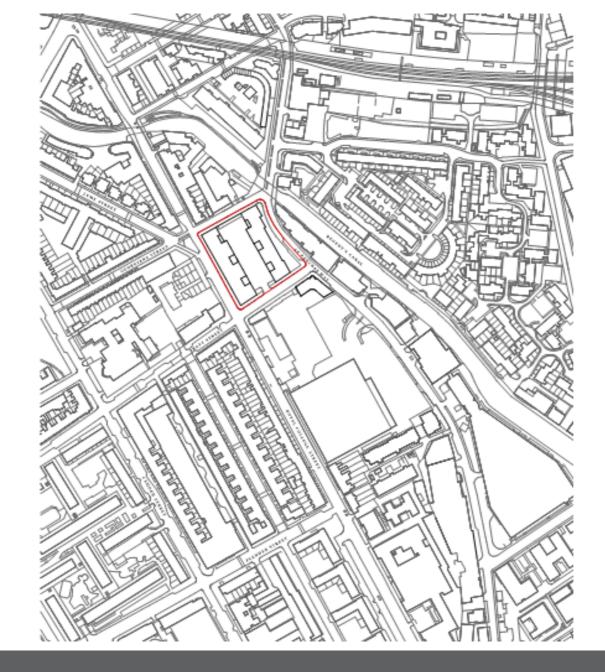
The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes

- Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
- Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
- 7 The applicant is advised that they will need to enter into a Section 38 Agreement with the Council for the adoption of sections of new footway. You are advised to liaise with the Council's Transport Team on this matter.

2019/4201/P - St Pancras Commercial Centre

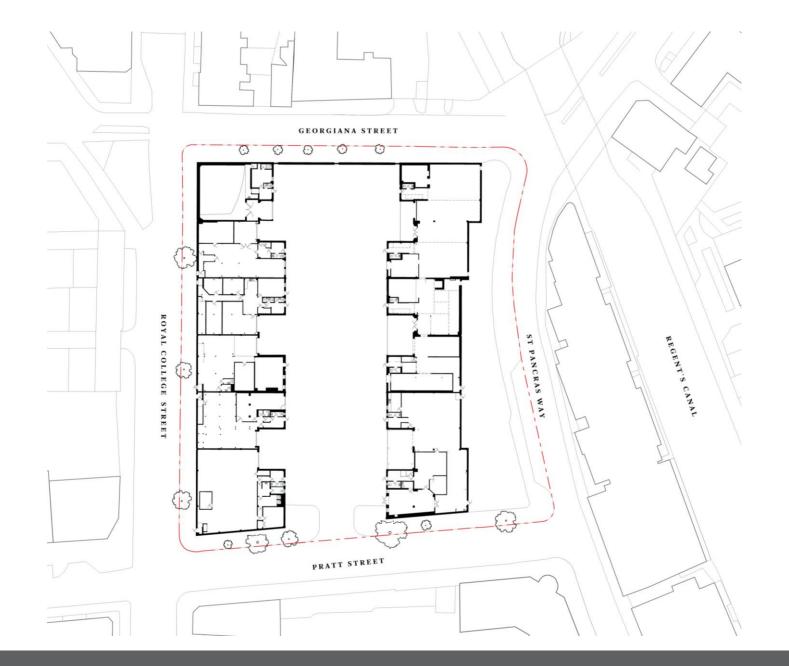


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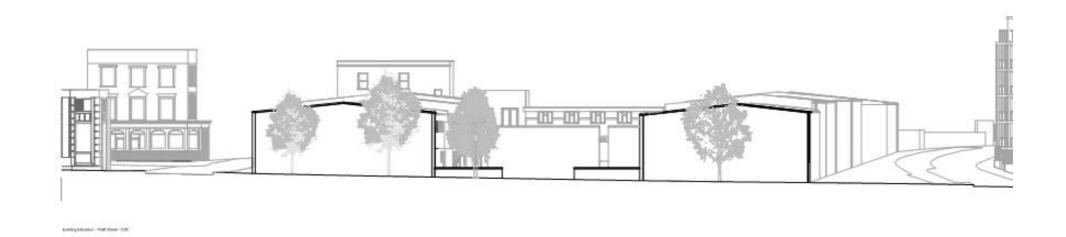


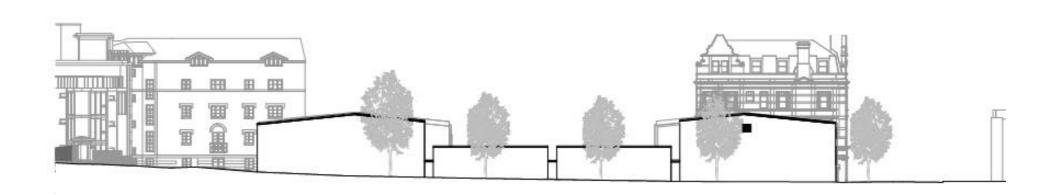


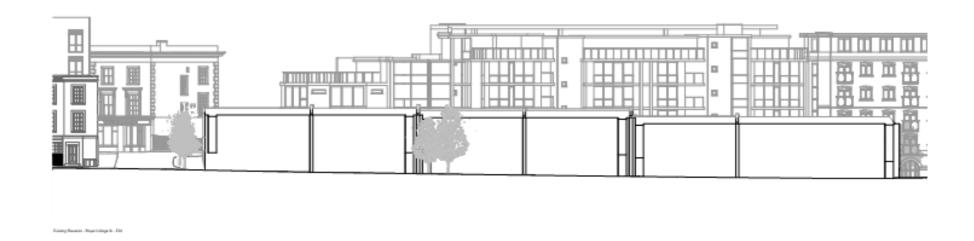


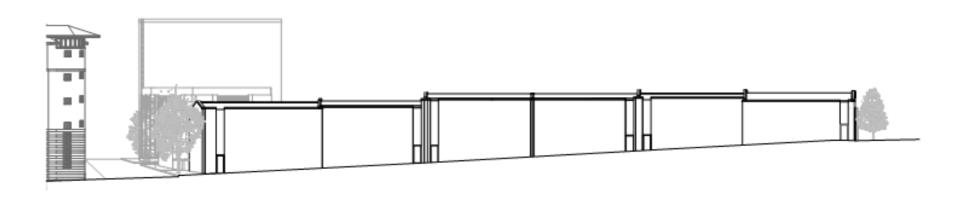


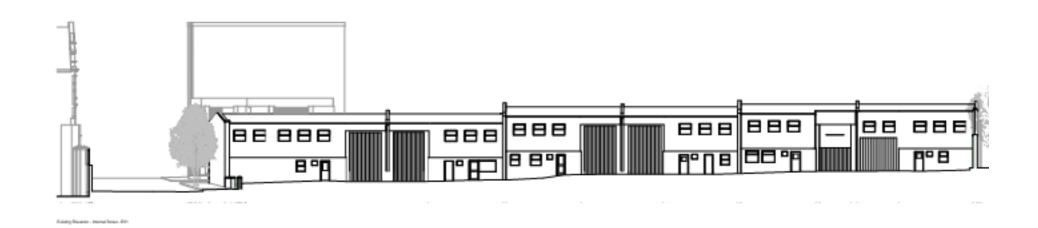




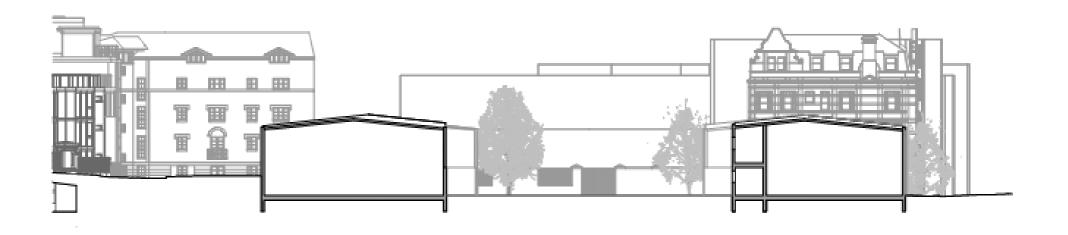


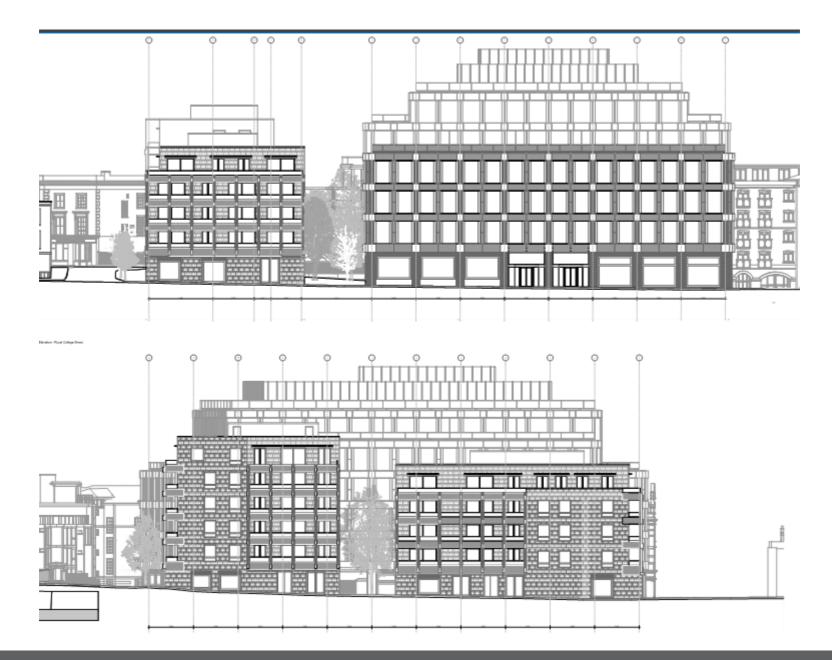


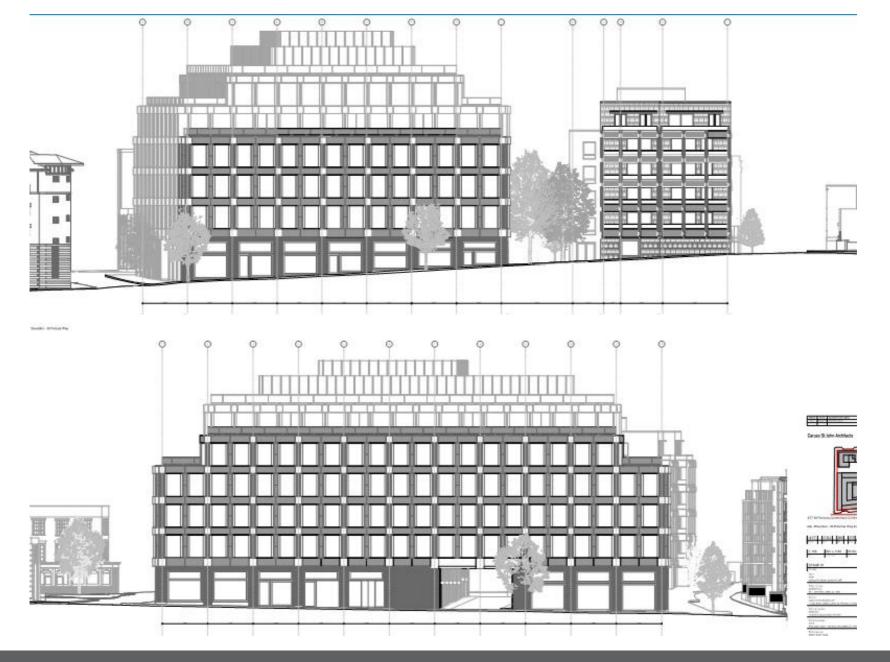


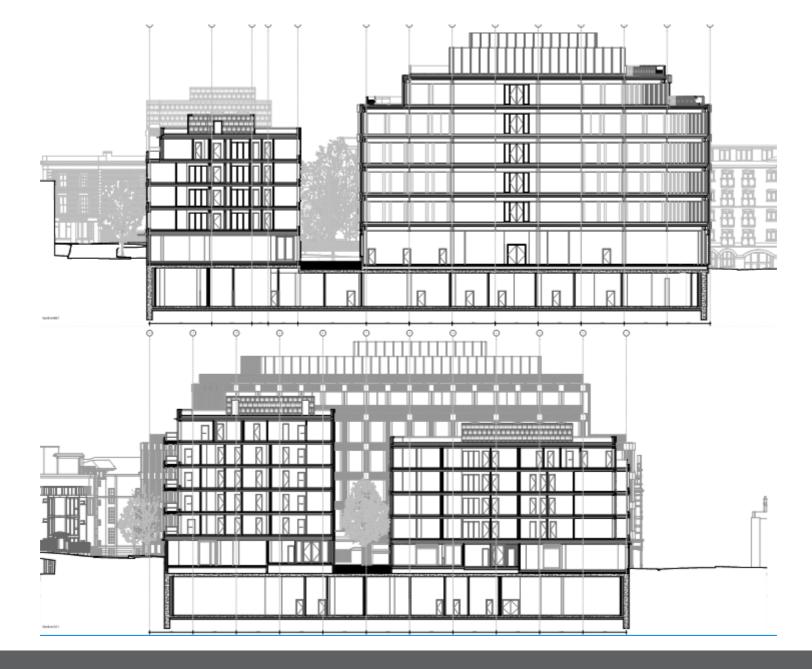


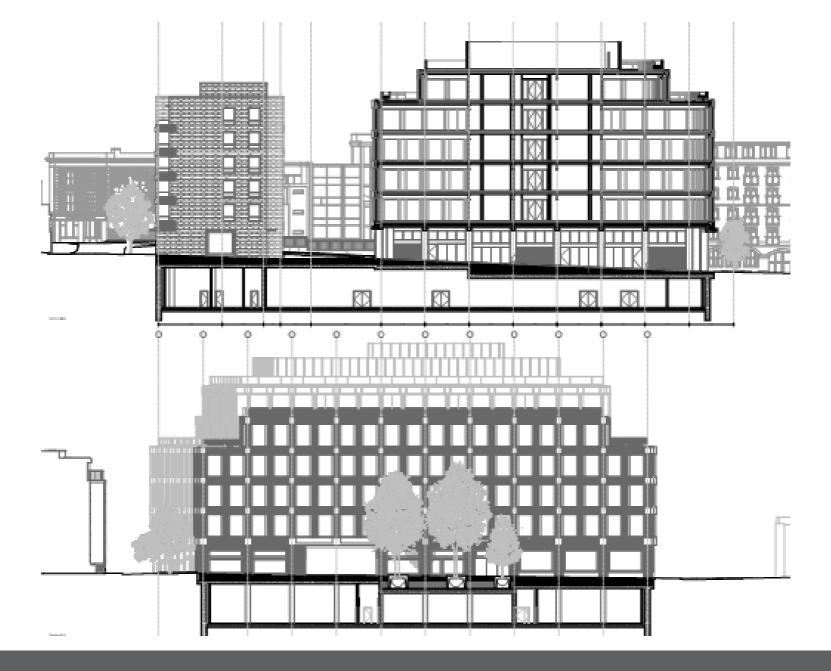


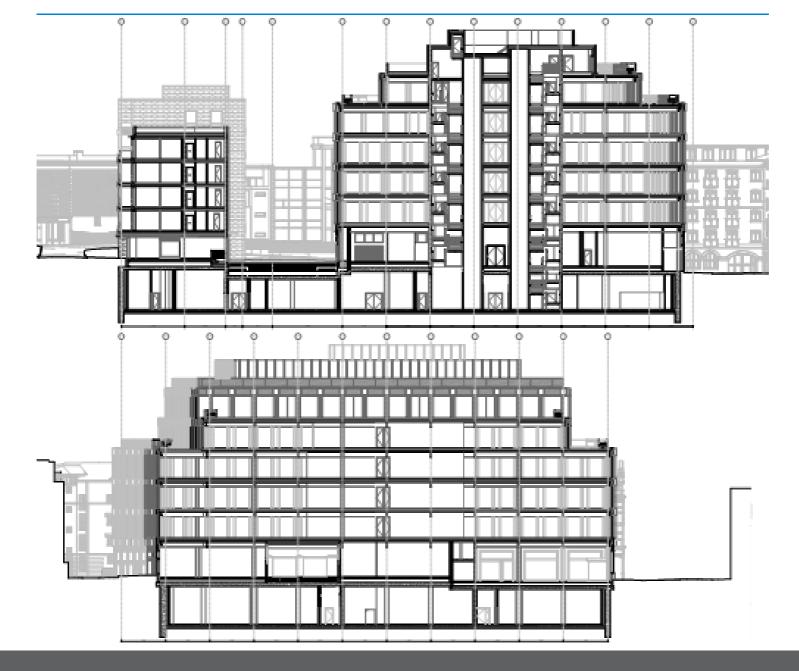


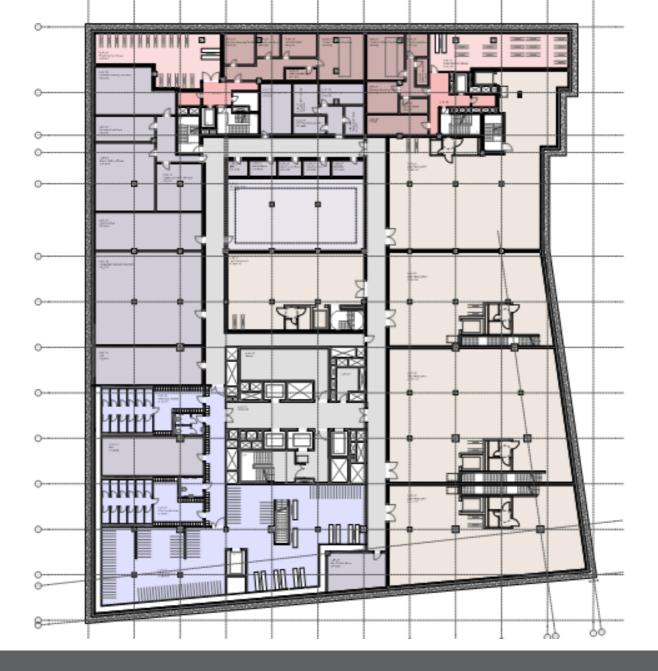




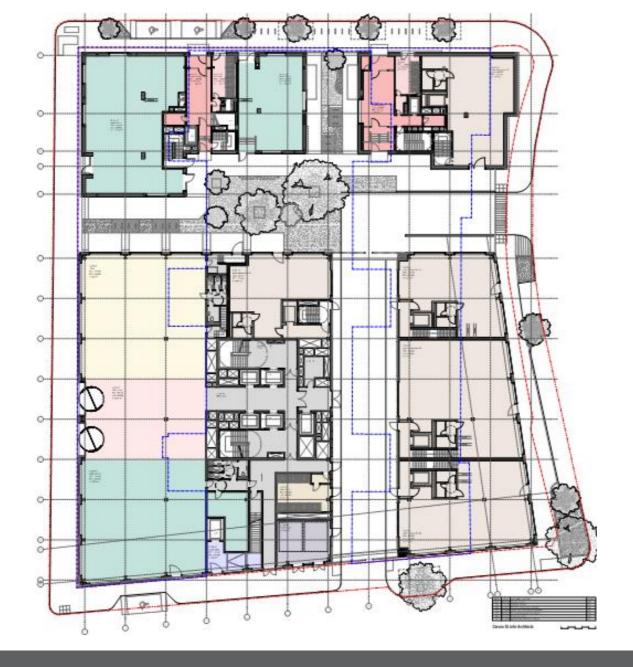


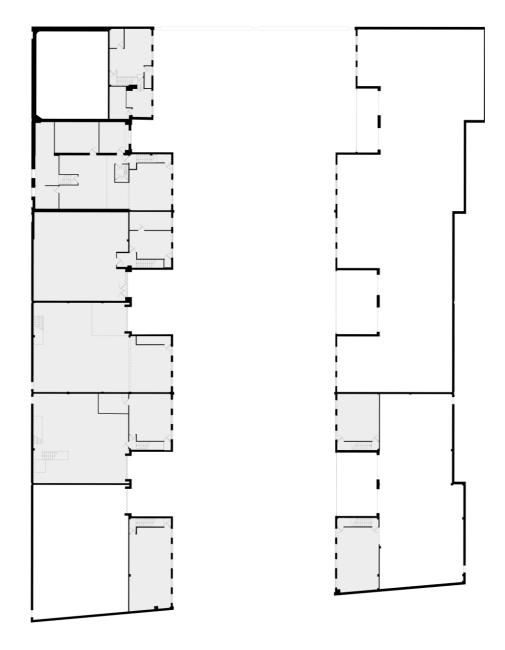




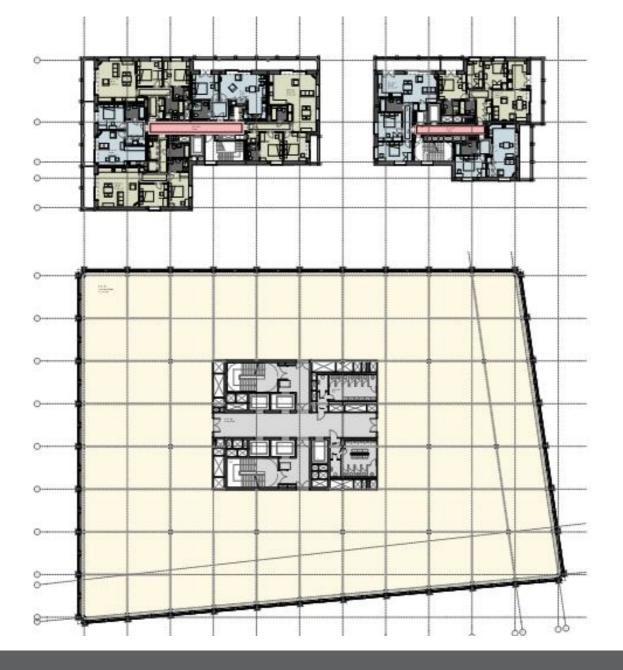


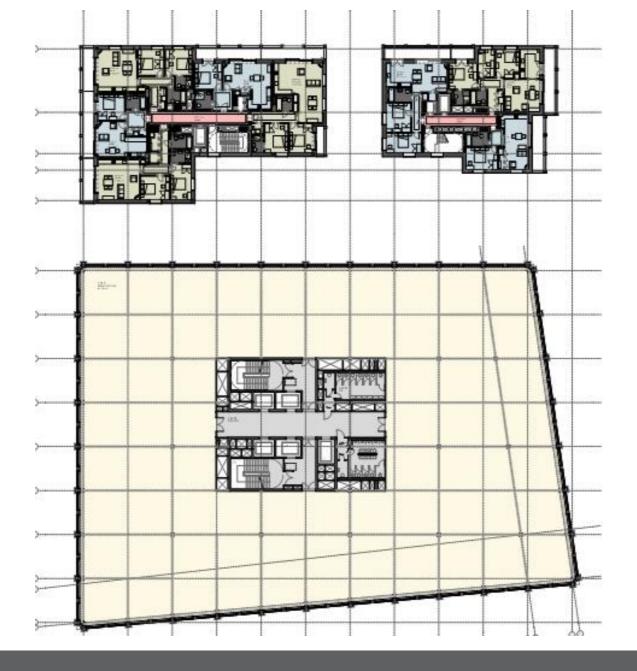


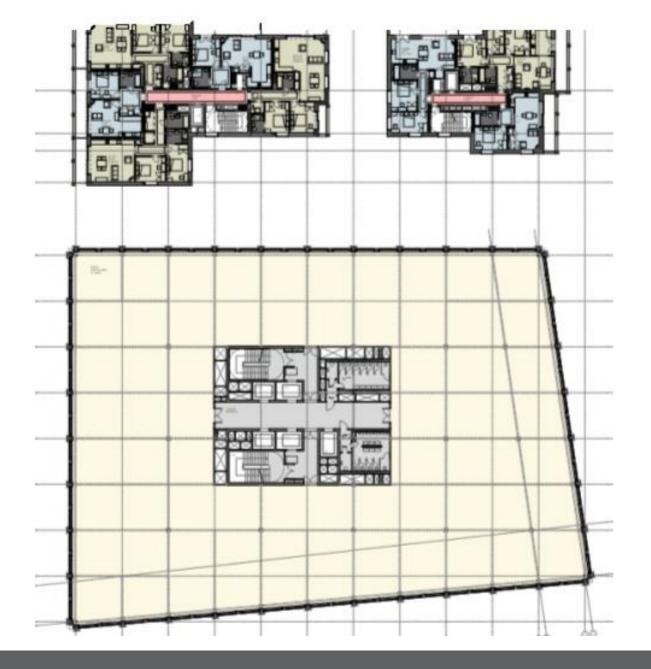


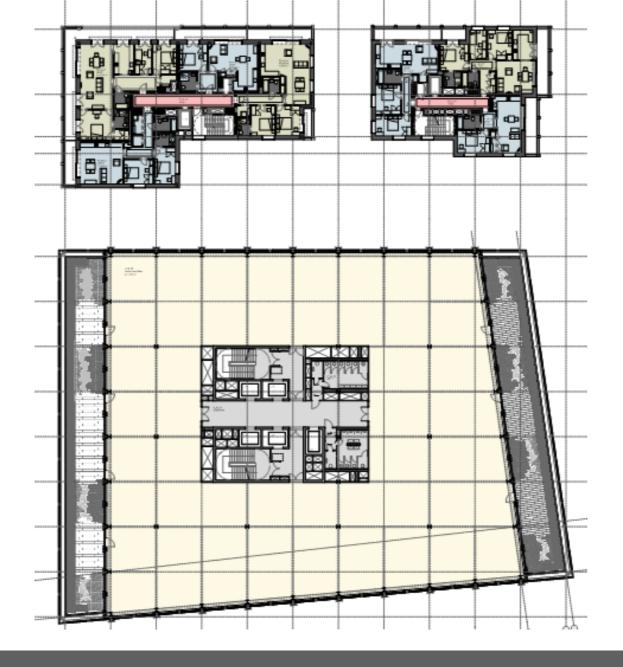


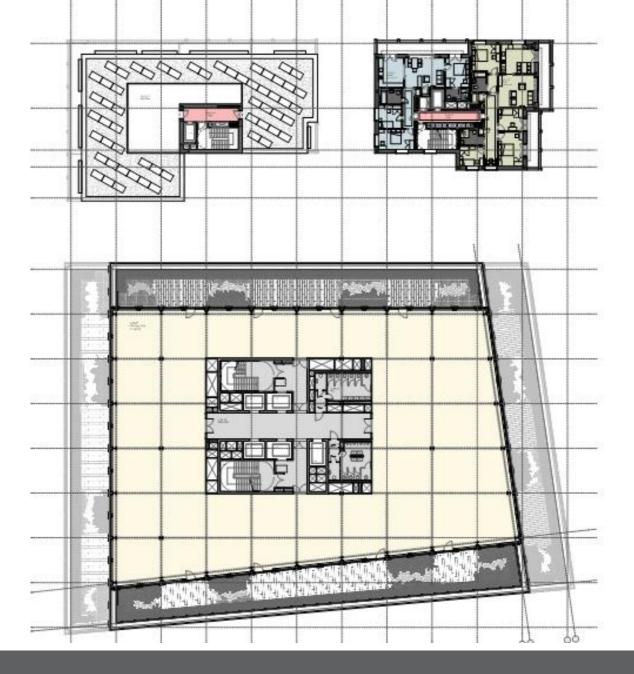


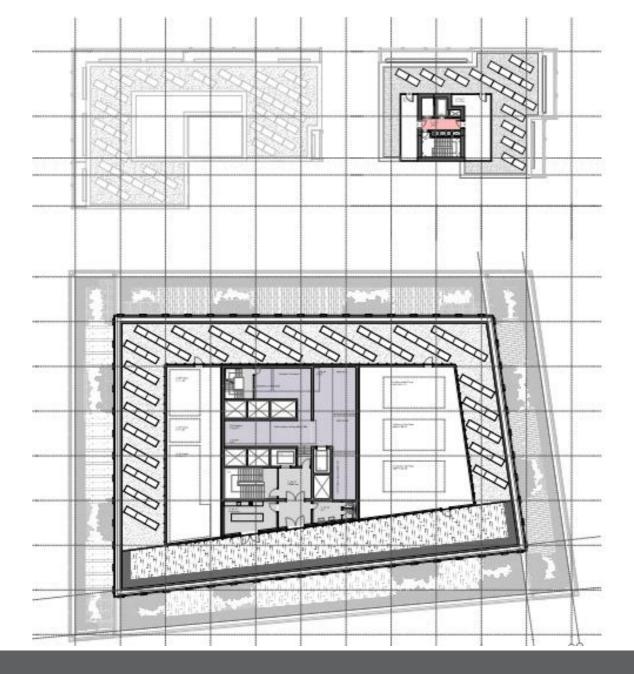


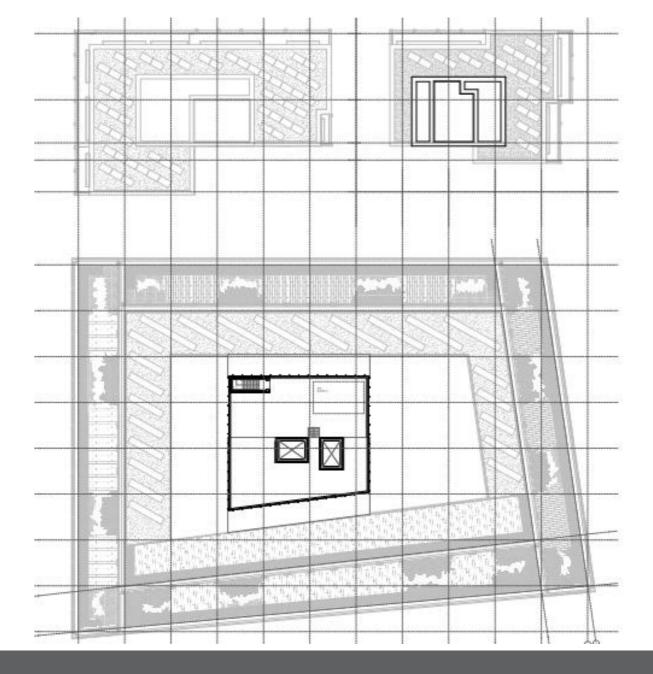


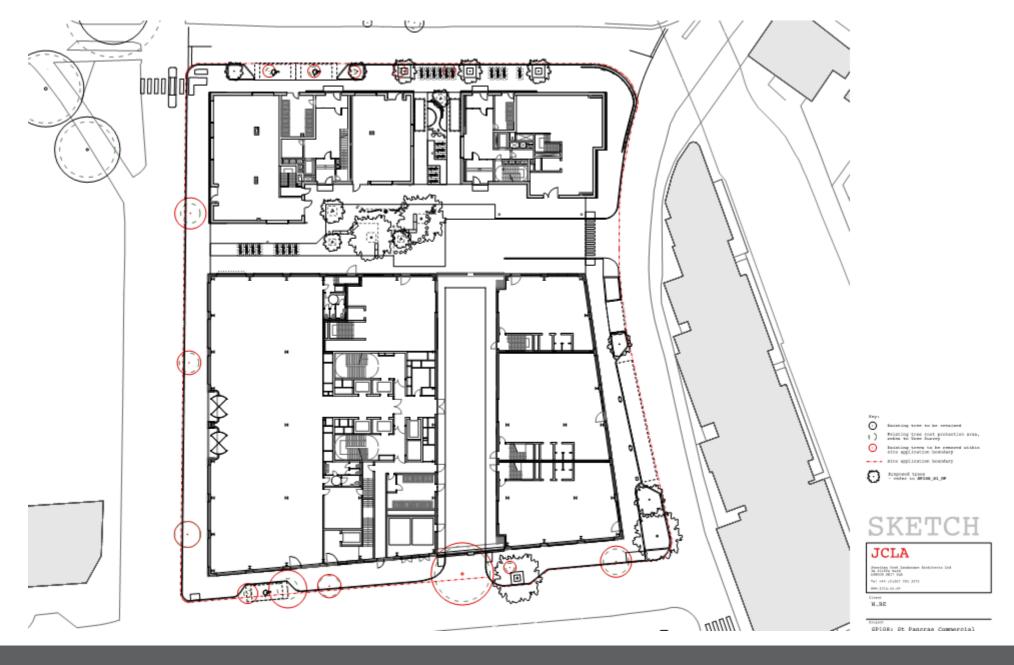


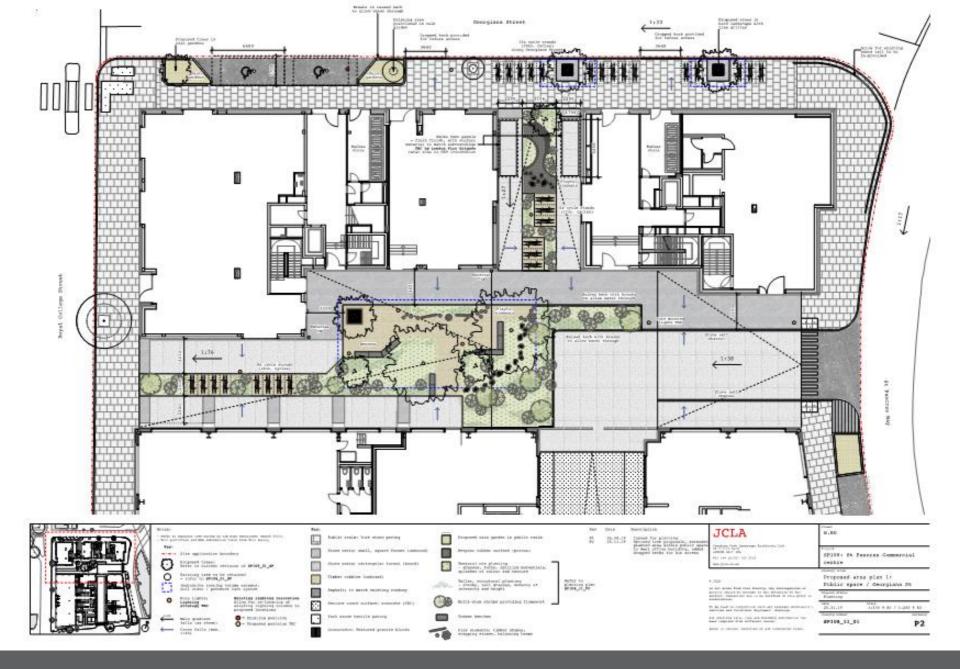








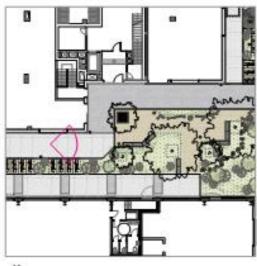


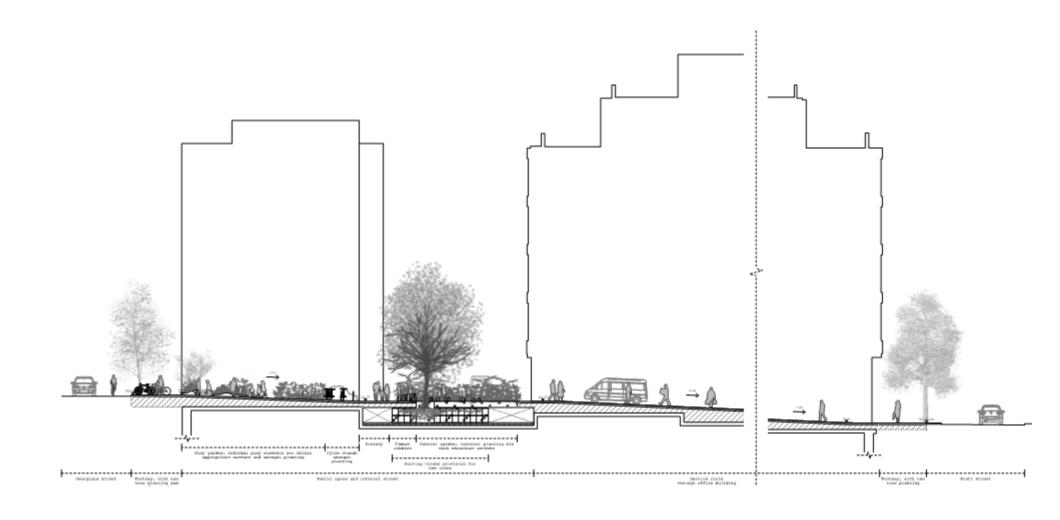




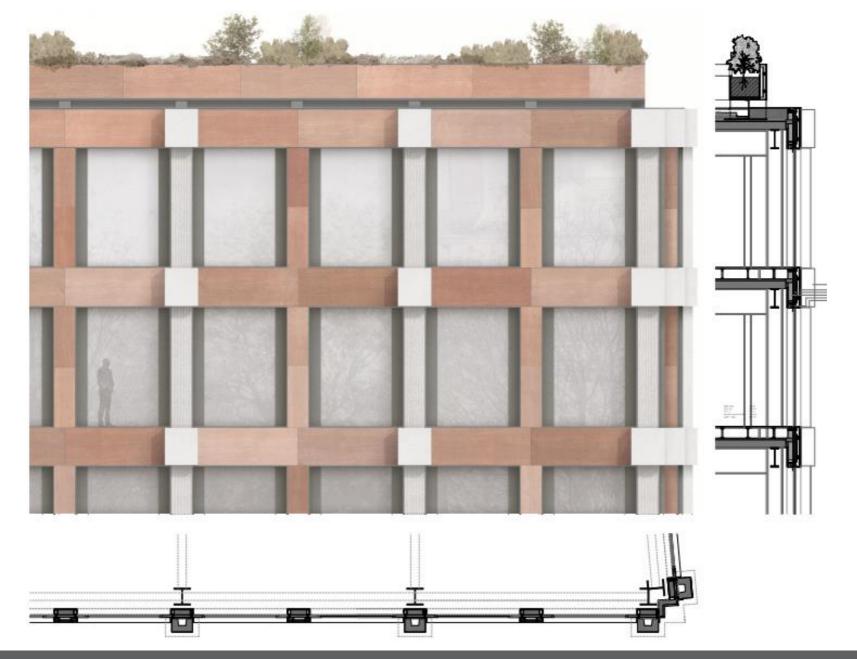




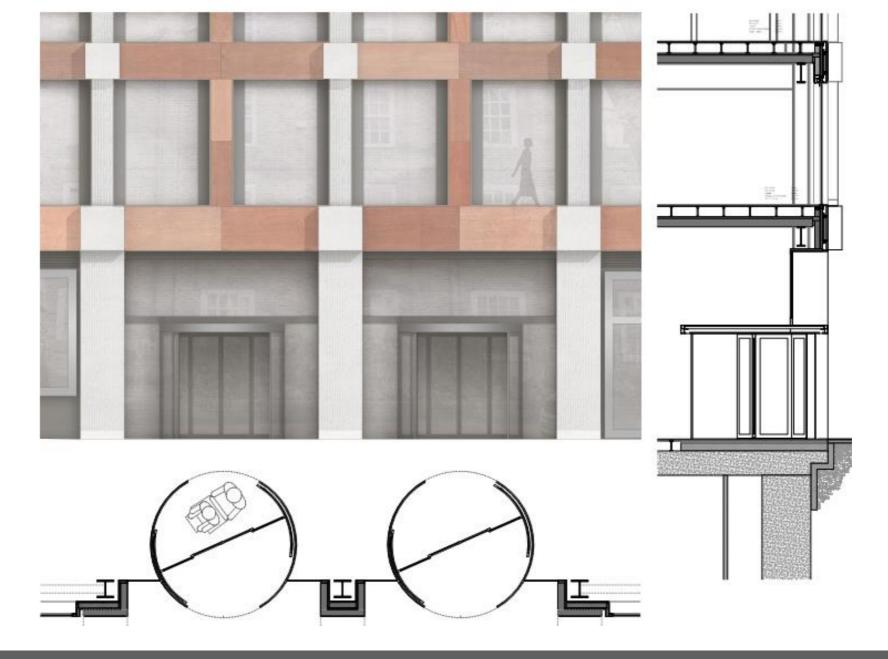


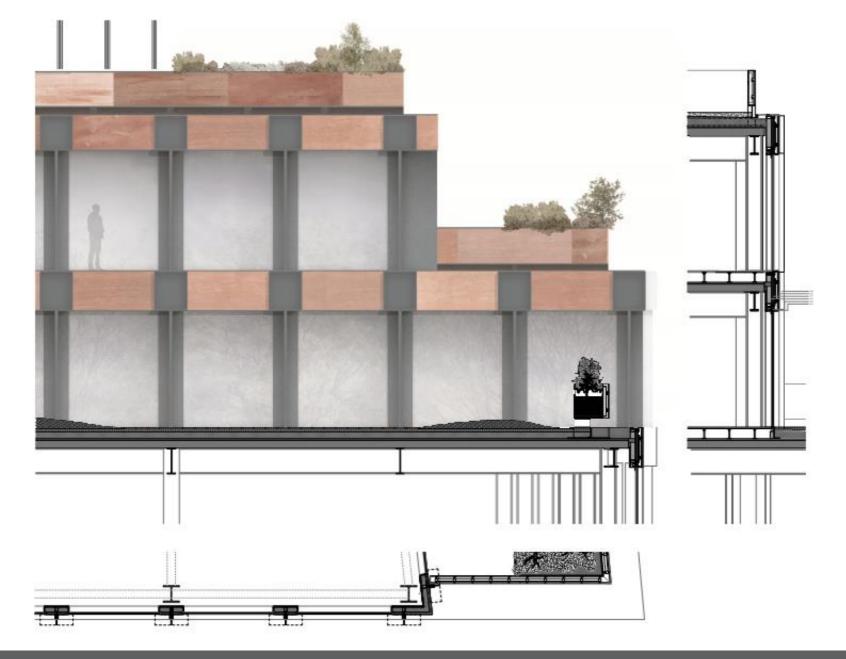


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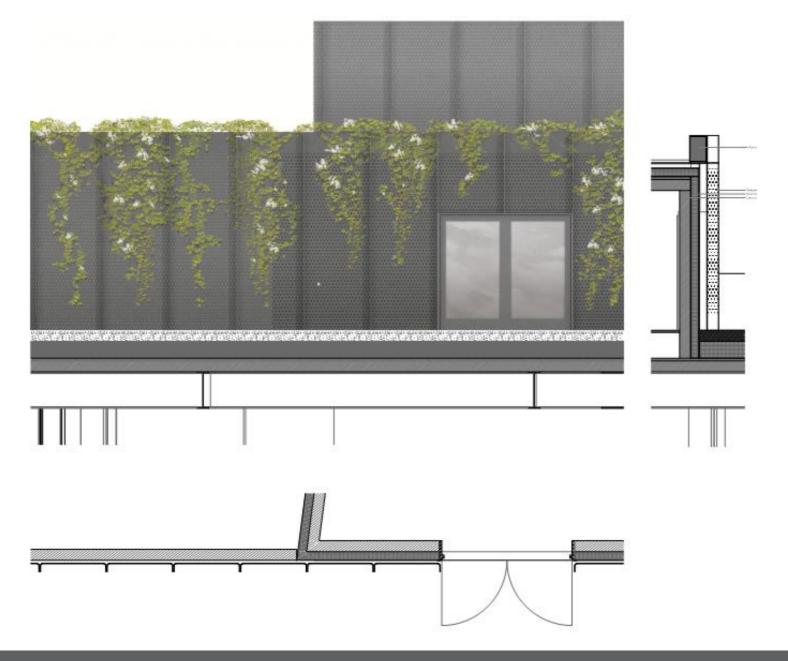


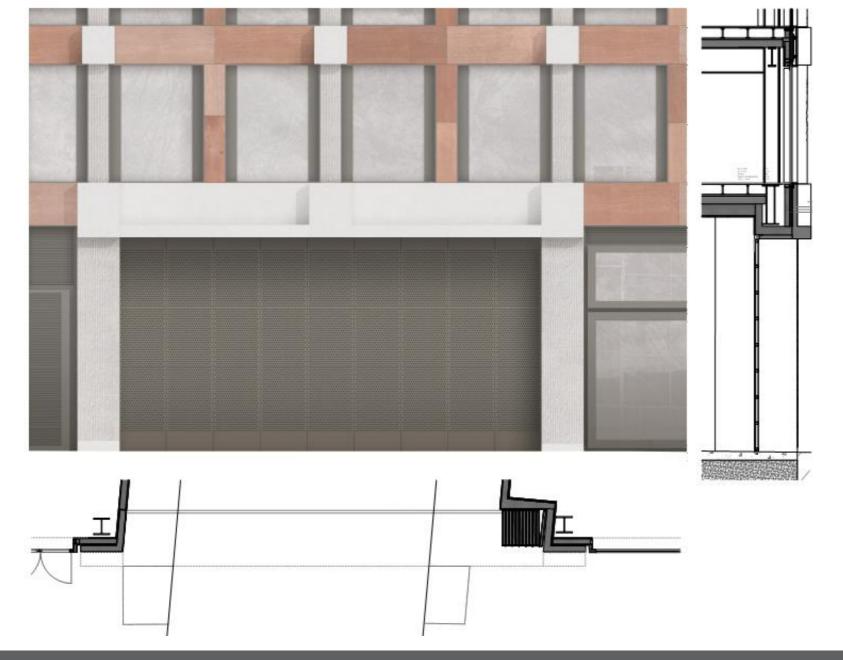






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Georgiana Street looking word



St Pancras Way looking south



Pratt Street looking east



St Paneras Way looking north



St Paneras Way looking south



Georgiana Street looking east









Proposed View 6: View along Lyme Street







Proposed View 9: View from Regent's Canal towpath (opposite Eagle Wharf)





Proposed View 13: Corner of St Martin's Close and Camden Street

