

Address:	2 - 6 St Pancras Way London NW1 0TB		2
Application Number(s):	2017/5497/P	Officer: Seonaid Carr	
Ward:	St Pancras & Somers Town		
Date Received:	03/10/2017		
Proposal: Demolition of the existing building (Class B1 and B8) and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use development of 54,247sqm business floorspace (B1), 73 residential units (C3) (10xstudio, 30x1 bed, 27x2 bed 7x3 bed), 87 bed hotel (C1), 1,601sqm gym (D2), 6,104sqm flexible retail (A1 - A4/A1-A4,B1/A1-A4,B1,B8) and 6,011sqm storage space (B8) development with associated landscaping work.			
Background Papers, Supporting Documents and Drawing Numbers:			
<u>Existing:</u> 11603_XP_001 Rev B, 11603_XP_100 Rev B, 11603_XP_101 Rev B, 11603_XP_102 Rev B, 11603_XP_103Rev B, 11603_XP_104 Rev B, 11603_XP_105 Rev B, 11603_XP_204_AA Rev A, 11603_XP_230_BB Rev A, 11603_XP_231_CC Rev A, 11603_XP_232_DD Rev A, 11603_XP_233_EE Rev A, 11603_XP_302 Rev A, 11603_XP_303 Rev A and 11603_XP_304 Rev A			
<u>Proposed:</u> <u>Floorplans:</u> 1603_P_001 Rev D, 1603_P_098 Rev E, 1603_P_099 Rev J, 1603_P_100 Rev K, 1603_P_101 Rev H, 1603_P_102 Rev G, 1603_P_103 Rev G, 1603_P_104 Rev F, 1603_P_105 Rev H, 1603_P_106 Rev H, 1603_P_107 Rev G, 1603_P_108 Rev K, 1603_P_109 Rev J, 1603_P_110 Rev H, 1603_P_111 Rev C, 1603_P_RP Rev F, 1603_P_137 Rev D, 1603_P_138 Rev C, 1603_P_139 Rev C, 1603_P_140 Rev C and 1603_P_141 Rev C.			
<u>Elevations:</u> 1603_P_302 Rev B, 1603_P_303 Rev D, 1603_P_304 Rev B, 1603_P_311 Rev D, 1603_P_312 Rev E, 1603_P_313 Rev E, 1603_P_314 Rev E, 1603_P_321 Rev E, 1603_P_322 Rev E, 1603_P_323 Rev E, 1603_P_324 Rev E, 1603_P_331 Rev F, 1603_P_332 Rev E, 1603_P_333 Rev F, 1603_P_334 Rev G, 1603_P_341 Rev F, 1603_P_342 Rev G, 1603_P_343 Rev F, 1603_P_344 Rev E, 1603_P_350 Rev E, 1603_P_450, 1603_P_451, 1603_P_452, 1603_P_453, 1603_P_454 and 1603_P_455.			
<u>Sections:</u> 1603_P_230 Rev B, 1603_P_231 Rev B, 1603_P_232 Rev D, 1603_P_240 Rev D and 1603_P_241 Rev C.			
<u>Documents:</u> Daylight and Sunlight Report by Waldrums dated 7 th March 2018, Design and Access Statement dated September 2017, Design and Access Statement Addendum dated March 2018, Sustainability and Energy Statement Rev C by Max Fordham dated 20 th March 2018, BREEAM Pre-Assessment by Max Fordham LLP dated September 2017, Townscape, Visual and Build Heritage Assessment by Tavernor Consultancy dated March 2018, Arboricultural Impact Assessment by Aspect Arboriculture dated March 2018, Flood Risk Assessment and SUDS Strategy by GD Partnership LTD dated August 2017, Health Impact Summary by Regeneris Consulting dated March 2018, Air Quality Assessment by Waterman dated			

September 2017, Pedestrian Level Wind Desk-Based Assessment by RWDI Anemos Ltd dated March 2018, Updated Retail Impact Assessment by DP9 dated March 2018, Basement Impact Assessment by GD Partnership Ltd dated September 2017, Transport Assessment by Caneparo Associates dated September 2017, Noise Assessment by Waterman Infrastructure & Environment dated September 2017, Affordable Housing Statement by Gerald Eve dated March 2018, Ecology Appraisal by Aspect Ecology dated September 2017 and Preliminary Risk Assessment by DTS Raeburn dated June 2017.

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to Section 106 Legal Agreement and referral to Mayor of London for his direction

Applicant:

Reef Estates Limited
C/O
2 St Pancras Way
London
NW1 0TB

Agent:

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	B1 Business - Office		26,190
Proposed	Business - Office B1a		54,247
	Residential C3		7,561
	Flexible Retail A1-A4		2,692
	Flexible Retail A1-A4, B1		2,370
	Flexible Retail A1-A4, B1, B8		1,042
	Hotel C1		4,823
	Gym D2		1,601
	Storage B8		6,011
	TOTAL		80,347

Residential Use Details:					
	Residential Type	No. of Bedrooms per Unit			
		Studio/1	2	3	Total
Market	Flat	32	20	0	52
Intermediate (rented)	Flat	7	4	0	11
Social Rent	Flat	0	3	7	10
TOTAL - All	Flats	40	27	7	73

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	52	0
Proposed	32	5

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 does not have delegated authority [clause 3(iv)]

The application includes a building which is over 30m in height 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.

Environmental Impact Assessment (EIA)

A screening opinion for the proposal was provided by the Council in February 2017 whereby that development did not constitute an EIA development under the EIA Regulations 2011/2015 Regulations.). An EIA is therefore not applicable to the development.

1 STRATEGIC CONTEXT

1.1 The Local Plan identifies the Camley Street area as a spatial area of regeneration focus under the Community Investment Programme. It highlights that whilst the area sits in a location undergoing significant change in close proximity to Central London, Kings Cross Central and Camden Town, it is also isolated and relatively inaccessible given its location and this needs to be addressed alongside changes in the area.

1.2 The Plan also states that a planning vision or framework document will be produced to ensure that growth and change takes place in an integrated and sustainable way, including addressing public realm and connectivity issues and identifies the following priorities for the area:

- Creating a more vibrant, attractive area that builds on its location adjacent to King's Cross Central and close to Camden Town;
- Enhanced connectivity and public realm, with more active overlooking of the street at different times of the day;
- Creating new public spaces and greening of the street environment; and
- Making more efficient and intensive use of land, taking opportunities to provide a mix of uses, including new housing and employment floor space.

1.3 A draft vision document is currently under preparation with a view to going out to consultation later on in 2018 and subsequent adoption as a Supplementary Planning Document (SPD). The document will have the aim of setting out strategic objectives for redevelopment in the area and coordinating opportunities as they arise to meet these priorities. The Ugly Brown Building site is situated within this wider Camley Street area and has a strong role to play in contributing to improvements in the local area.

2 SITE

- 2.1 The application site covers an area of approximately 1.14 hectares (11,400 sqm) and is located to the eastern side of St Pancras Way. The site is triangular in shape bounded by St Pancras Way to the west, Regent's Canal to the east and Granby Street to the south. To the north at 8 St Pancras Way is a residential block of 6 storeys in height.

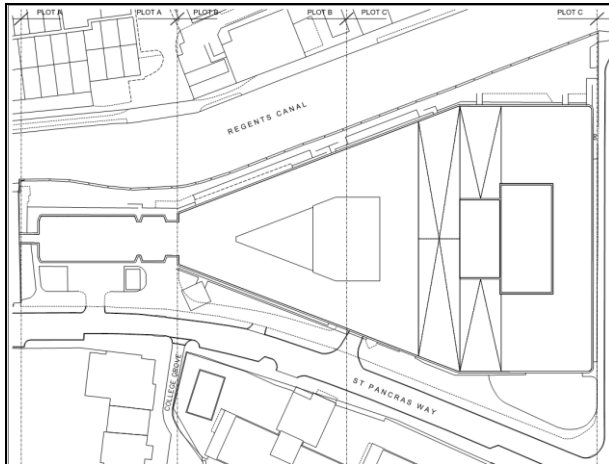


Figure 1 – The existing site

- 2.2 The site comprises three buildings, collectively known as the Ugly Brown Building, built originally as a Royal Mail facility it was later converted into other uses in 2000 and is currently under three freehold plots, referred to within the application as Plots A, B and C.
- 2.3 Existing buildings on the site are four storeys in height with a continuous elevation along St Pancras Way and Regent's Canal. The existing buildings provide no routes through the site and therefore no access to the canal from St Pancras Way. All of the buildings are in use as office accommodation. Plot A, located to the northern part of the site is largely vacant at present. Plot B, is occupied by Ted Baker PLC and has been their headquarters since 2000. Plot C is a data centre occupied by Verizon.
- 2.4 The site is located within the Regent's Canal Conservation Area, the buildings on site are defined within the Conservation Area Appraisal and Management Strategy as buildings which make a negative contribution to the Conservation Area.
- 2.5 The south east corner of the site lies within the Wider Setting Consultation of the Parliament Hill to St Paul's London Panoramas from assessment point 2A.1. It is not located within the Protected vista itself.
- 2.6 The site has excellent access to public transport. The site is located some 650m north of St Pancras and Kings Cross Stations providing multiple options for onwards transport. Mornington Crescent underground station is some 650m east.

3 THE PROPOSAL

- 3.1 Planning permission is sought for the redevelopment of the existing site to include demolition of all existing buildings on site and replacement with six buildings to provide a mixed use development comprising office, hotel, residential, gym, flexible retail and storage space.
- 3.2 The proposed site would be formed of 6 buildings spread across 3 phases A to C. Each building has been named associated to their plot and will be referred to within the report by the names noted on Figure 2 below (A, B, C1, C2, C3 and C4).

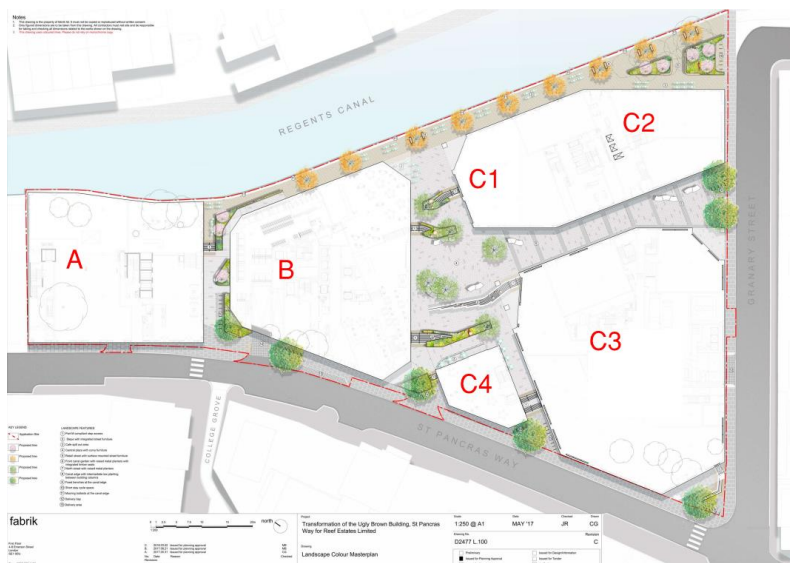


Figure 2 – The proposed site demonstrating building names

Revisions

- 3.3 During the course of the application a number of amendments were sought to the proposal these are summarised below:

Land Use

- The number of residential units was increased from 69 to 73 units
- Change in mix of affordable housing to provide larger family sized units and smaller intermediate sized units.

Design

Building A

- The colonnade to the canal side of the building has been infilled at ground floor level.
- Top two floors of the building set in on the canal frontage.
- Materials altered to comprise a precast base with pillars framing the glazing at ground floor level, to the 1st to 4th levels, the building would be of brick construction with metal framed windows and the upper two floors would be precast fins with glazed curtain walling system behind.

Building B

- At ground floor levels the corners of the buildings were set back to improve visibility through the site.
- The lower 3 brick levels which form the base of the building were amended to a dark brick with a light mortar.
- The material of the upper elevations (levels 3-8) are now formed of a glazed structure with two storey metal fins, comprising 3 layers each projecting 300mm forward as they move up the building.

Building C1

- The northern corner adjacent to the canal set back at ground floor level to improve views of the canal and into the development.
- Facades of the building match building A.

Building C2

- The southern corner of the building removed at all levels to set the building line back from the canal and provide new public space adjacent to the canal.
- Alterations to the facades to amend the detailing of windows and remove the balconies located to the southern elevation.
- Alteration to the colour of the metal balustrades

Building C3

- Ground floor corners set in to open up routes into the site.
- The facades of the building have been altered to a similar design approach to Buildings A and C1.
- Increased the active frontage along Granary Street.

Building C4

- Pavilion redesigned to alter footprint of the building and amend the materials to be the same as the base of building B, with the aim of it being conceived as a section of Building B.

The Proposal

3.4 As noted above the development is for six new buildings on site. The land uses and heights for each building are outlined below:

Building A

3.5 A seven storey building providing office accommodation at first to seventh floors and to the ground floor, flexible business and retail spaces, uses B1, A1-A3 and B1, A1-A4.

3.6 The building would have its own cycle area within the basement, accessible by lifts, the basement area would also accommodate plant and shower and change facilities for the cycle store.

Building B

3.7 A nine storey building, providing an 87 bed hotel with associated bar, restaurant and ancillary space located to the ground, first and second floors.

This would be a Ted Baker branded hotel and sit alongside the Ted Baker Headquarters that would occupy the remainder of the building providing of B1a office accommodation.

- 3.8 Building B would include a basement level car park with 30 car parking spaces which would be accessed via a ramp on St Pancras Way. The basement would also include a multi purpose space of B1 use together with a plant room. Cycle storage for the hotel and office accommodation would be located to the ground floor level together with associated shower and change facilities.

Building C1

- 3.9 At 7 storeys in height, including the two top levels being set back from the lower levels, building C1 would provide B1a office accommodation together with two flexible units to the ground floor providing A1-A4 and B1, A1-A4 accommodation.

Building C2

- 3.10 A 12 storey building that would provide 73 residential units at first to 12th floor with two flexible retail units at ground floor one A1-A3 and one A1-A4.
- 3.11 Of the 73 residential units, of these 52 would be private market units (32 x studio/1 bed and 20 x 2 bed) and 21 would be affordable; 11 intermediate rent (7 x 1 bed, 4 x 2 bed) and 10 social rented (3 x 2bed and 7 x 3 bed).

Building C3

- 3.12 Located to the corner of St Pancras Way and Granary Street this building would be part 8 part 11 storeys in height. It would adjoin building C1 via 2 link bridges, one at level 2 and the second at level 4.
- 3.13 To the ground floor of C3 would be on site servicing bays, 2 disabled car parking bays, flexible retail units and B1a entrance lobbies which provide access to the upper levels which would provide B1a office accommodation.

Building C4

- 3.14 The pavilion building would provide a standalone building to be used as Flexible A1-A4 use which would include a terrace at roof level.
- 3.15 The basement within Plot C would be formed of 2 levels, basement level two would accommodate the B8 storage space accessible via lifts. Basement level one would accommodate the proposed gym together with the ancillary requirements for the above uses such as cycle storage and associated change facilities, refuse store, plant rooms and some flexible retail space.

Phasing

3.16 The proposed development would come forward in 3 phases, the draft proposal is for the following timeframes:

- Phase 1 – Plot A to be constructed 2018-2020;
- Phase 2 – Plot B to be constructed 2020-2022;
- Phase 3 – Plot C to be constructed 2023-2025.

Basement

3.17 The development would include a part single part two storey basement area. As noted above, the two storey element would be located wholly under Plot C and the single storey element across the entire site. The basement level B1 would have a floor area of 9,802sqm and basement level B2 6,183.6sqm. The basement would excavate between 5 and 10.3m below ground level across the site.

Landscaping

3.18 The development is proposing a comprehensive landscaping proposal across the site. The strategy is that the site would be comprise 6 areas:

- A central plaza, with curved pathways to provide level access across the site and planted areas.
- A retail street located between C1 and C and C3 this will primarily be hardstanding and street furniture to provide areas for rest.
- The Canal frontage would provided a pedestrian route through the site along the canal together with space for users to remain. It would be used for cafes to located tables and chairs and incorporate two planted beds together with street furniture.
- North Street, located between buildings A and B, would be a pedestrian thoroughway including street furniture and paving.
- The street frontage along St Pancras Way would match the hard landscaping within the site and include street trees and cycle stands.

3.19 The proposals include the removal of 30 trees; 1 Cat A, 11 Cat B, 17 Cat C and 1 U grade trees. The development proposed to replace these with 27 trees.

Car and cycle provision

3.20 The development would include the provision of 32 car parking spaces within the basement of Building B, for sole use of the existing occupier Ted Baker. This would be a reduction on the existing provision which is 52.

- 3.21 Across the development there would be the provision of 832 long stay and 104 visitor cycle spaces. These would be located to the ground floor of Building B and basements levels of A, C1, C2 and C3.

4 RELEVANT HISTORY

The site

- 4.1 There have been no previous planning applications submitted for the application site.

The surrounding area

101 Camley Street

- 4.2 2014/4385/P - Demolition of existing building and redevelopment for a mixed use building ranging from 6 -13 storeys comprising 2,220sqm employment floorspace (Class B1), 121 residential flats, the provision of a pedestrian footbridge with disabled access over the Regent's Canal, and associated landscaping and other works relating to the public realm. Application approved March 2015, works on site at present,

102 Camley Street

- 4.3 2014/4381/P - Demolition of existing warehouse building (Class B8) and redevelopment for a mixed use building ranging from 8-12 storeys comprising 1,620sqm employment floorspace (Class B1), 154 residential flats, the provision of a public ramp access to the Regents Canal towpath, and associated landscaping and other works relating to the public realm. Application approved March 2015, works on site at present.

103 Camley Street

- 4.4 2011/5695/P - Demolition of existing industrial buildings (Class B1c & B8) and the erection of a building ranging from 4-12 storeys to create a mixed use development comprising 307 x student units accommodation (Class Sui-Generis) including student cycle store; 14 x 2-bed, 15 x 3-bed and 11 x 4-bed self contained residential flats (Class C3); incubator business units comprising 1,653sqm floorspace (Class B1); 2 x retail units of 406sqm (Class A1/A3) and associated works and improvements to public realm including canal footpath. Application approved March 2012, works completed and site occupied.

11-13 St Pancras Way

- 4.5 2011/1586/P – Erection of part 6, 7, 8 and 10 storey building comprising 3,877sqm builders merchant (Class Sui Generis) at ground and part mezzanine level and 563 student bedspaces (Class Sui Generis) with ancillary student facilities to the upper floors. Application approved November 2011, works completed and site occupied.

5 CONSULTATION SUMMARY

- 5.1 The initial consultation period ran from 20/10/2017 until 16/11/2017. Site notices were displayed around the site and a press notice was published in the

Camden New Journal. Consultation responses were received from 10 residents.

- 5.2 Following the receipt of revisions for the application, the formal re-consultation process ran from 08/03/2018 until 03/04/2018. Site notices were again displayed around the site and a press notice was again published in the Camden New Journal. The second consultation resulted in receipt of responses from 4 residents. Please note the response summary below identifies the relevant consultation to which it relates.
- 5.3 Consultation responses have been summarised below. They are presented in the following order:
- **Statutory**
 - **Local Groups/Stakeholders**
 - **Individual Responses**
 - **Development Management Forum**
 - **Developers Briefing**
 - **Design Review Panels**

Statutory

5.4 Greater London Authority – Stage 1 Response

This response was provided following the revisions to the application.

- The principle of a mixed use scheme is supported in principle. The applicant should provide some flexible, affordable workspace and some small and affordable retail units.
- The provision of affordable housing is broadly welcomed. If the proposals cannot be assessed under the Fast Track Route, then a full financial viability assessment must be provided. A late stage review will also be required and secured via the S106.
- The applicant should seek to avoid closing off the canal path unless this can be robustly justified.
- The applicant must prioritise connection to a nearby district heat network, reduce the number of energy centres to one, provide further details and a contribution towards carbon offsetting.
- The layout of the site must ensure pedestrians and cyclists movement wherever feasible including the canal path.
- Local bus service enhancements are required.
- A contribution of £32,000 towards Legible London signage should be secured.
- The Council is advised that the application does not comply with the London Plan and draft London Plan but possible remedies could address these deficiencies.

5.5 Transport for London (First Consultation Response)

Trip Generation

- The trip generation is unlikely to impact on London's strategic highway network. Bus passenger numbers may require some bus service

enhancement, especially given that there are only two bus routes that run reasonably close to the site.

Car Parking

- Given the location of the site, consideration should be given to reduced provision or a car free development.
- TfL would accept the proposed level of provision provided it will be converted to other uses if and when this business moved out.
- All residents should be exempt from parking permits in the area, except for blue badge holders. A parking management condition should be imposed on any planning permission to ensure parking is used only by Ted Baker and to manage the use of Blue Badge spaces.

Cycle Parking

- The provision would meet London Plan standards. All should be provided with level access.
- 5% of spaces should be suitable for use by larger bikes such as cargo bikes and those used by disabled cyclists.

Healthy Streets

- The Pedestrian Environmental Review System (PERS) audit submitted is satisfactory. The Council may wish to request a Section 106 contribution for addressing the issues highlighted as amber, as improving the health of Londoners through transport planning and urban design is now a key priority for the Mayor and TfL.
- Wayfinding in the vicinity of the site should also be improved.
- Signage on or to/from the Regent's Canal towpath should be considered.
- The Council should secure a Section 106 contribution of up to £32K for signage.
- Appropriate locations for up to 4 signs should be identified prior to commencement of the public realm works and signs should be installed or a future arrangement for their installation should have been agreed with TfL prior to completion of the development.
- It is unclear how permeable the main site will be to cyclists and at which points cyclists will be able to enter and exit. The applicant should demonstrate how cycling permeability through the site will be maximised.

Servicing & Construction

- The applicant has provided a draft Deliveries and Servicing Plan, the Council should consider making the applicant strengthen the document with more SMART targets (Specific Measurable Achievable Realistic Time-related), a commitment to ban workplace deliveries, and a firmer commitment than 'wherever possible' to servicing only outside peak hours.
- Night time servicing could be considered given the neighbouring uses include builders merchant and student accommodation.
- TfL would support a condition encouraging servicing of the development by canal boat during both site clearance and construction and once occupied.
- TfL would also support the development being future-proofed so that servicing by canal boat is possible for future occupiers.

- The Council may wish to secure a Construction Logistics Plan (CLP) by condition to be produced following TfL's guidance.
- Measures included in the submitted draft CLP are welcome but lack detail. TfL encourages the Council and applicant to consider rewriting the CLP to follow our new guidance.

Travel Plan

- TfL would suggest a higher and more realistic mode share for cycling is agreed with the Council. A 15% cycling mode share should be targeted within 5 years and given the close proximity of local amenities and employment opportunities highlight in the TA, an ambitious 3.5% increase in walking.
 - For the employment uses, the Council may wish to mandate achievement of at least a Gold STARS (Sustainable Travel Active Responsible Safe) accreditation within 3 years in the S106 agreement, as the national sustainable travel group Modeshift has recently expanded to schools and workplaces.
 - The Council may also wish to secure a TRICS (Trip Rate Information Computer System) compliant Travel Plan.

5.6 Transport for London (Second Consultation Response)

5.7 The second consultation response from TfL fed into the Stage 1 response from the GLA and is as noted above in paragraph 5.4. Their main area of concern was the building line of building A coming up to the canal edge due to futureproofing a route along the canal and the need to cycle routes through the site in a north-south direction.

5.8 Following discussions during the course of the application and amendments that were made, TfL have now withdrawn their objection to the development which fed into the GLAs response.

5.9 Thames Water (First Consultation Response)

- In respect of surface water drainage, it is the responsibility of a development to make proper provision for drainage to ground, water courses or suitable sewer.
- The applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage.
- In regard to sewerage infrastructure capacity, no objection.
- No piling should take place until a piling method statement is submitted, secured via condition.
- Recommend the installation of a fat trap on all catering establishments and collection of waste oil by a contractor.
- Condition recommended regarding water supply infrastructure.
- We would expect a significant reduction from current peak discharge rates. We expect all Surface Water to be discharged to the canal.
- A trunk sewer runs across the site and may not be diverted.

5.10 Thames Water (Second Consultation Response)

- Responded with the same comments as above.

5.11 Canal & River Trust (First Consultation Response)

Design

- We support the commercial uses along most of the ground floor facing the canal, creating a vibrant and interesting frontage. However the close proximity of the buildings to the water's edge counters this to some degree, and we feel the design would benefit from some opening out to create a meaningful waterside plaza.
- The proposal could create a feeling of canyoning with the building have a uniform frontage along the canal and considerable height.
- There is a generous public space in the centre of the development and we would query if this wedge could be rotated, so that the main thoroughfare through the site widens out onto the canalside, with a meaningful and generous waterside 'destination'.
- If Block B could also be stepped back it would improve the waterside and appear less overbearing.
- The increase in height adds to the possible sense of overcrowding of the canal. The stepping back of the top 2 stories of the low element of Block C1 and the top floor of Block A helps to some extent, but the mass of Block B seems very large, especially as this visually increases above third floor. It would be improved if the mass of this building could be decreased somehow by stepping back the top storey, cutting away the corner into the public thoroughfare, or reducing the overall height of the block.
- The random positioning of the cladding on Block B appear a bit fussy. While we admire the desire to seek something bold and interesting we are not convinced by the proposal.
- We are concerned by the extent of showers and bike storage along the ground floor canal frontage of Block which would present a largely blank façade. If the hotel bar or other open uses could be placed along this elevation it would be an improvement to the vibrancy of the canalside.
- The mix of balconies on C1 helps animate the façade and it would be enhanced if carried through to lower element.

Impact on structural integrity of the canal

- Informative and condition regarding mitigation measures during demolition.
- The contractor should develop a works sequence to ensure demolition of the existing structure does not destabilise the canal. New piling works are proposed close to the canal so a displacement and vibration monitoring regime will need to be in place for the work.

Impact on water quality of Regent's Canal due to draining proposal

- The applicant should commit to a design and maintenance regime for the biodiverse roofs that will ensure only low nutrient runoff will be discharged to the canal. This should be part of the landscaping condition.

- If there was any request to discharge extracted groundwater from the construction phase to the canal, we would require water quality data to ensure this was acceptable.
- The applicant should be aware that any discharge of surface water drainage into the Regent's Canal will be subject to agreement with the Canal & River Trust's Utilities team, recommended informative.

Impact on biodiversity of the waterway corridor and adjacent moorings

- The residential moorings along the canal should be treated as residential properties for the purposes of the site assessment.
- Boats often rely on solar panels to provide electricity for heating and other needs, and if the moorings are overshadowed the boats are likely to be reliant on generating power from their engines, which can lead to additional noise and smells. We would like the applicant to consider this potential impact on the moorings and the application site's future residents.
- We are trialling the use of electricity bollards for visitor moorings and this could be an option for consideration here, which could form part of the S106 agreement to mitigate the impact of the development.
- To help mitigate the expected overshadowing from the development we would expect enhancements to its ecology. There may be opportunities for marginal aquatic planting through floating gardens. Bird and bat boxes would also benefit ecology.
- There does not appear to be a lighting plan for the development and suggest it is secured via condition.
- The development could make use of the canal water for heating and cooling of the development.
- Given the increase number of people coming to and from the site we would expect a contribution towards improving the canal environment for all users. We are currently working with the Camden Town Unlimited BID to improve the stretch of towpath between Camden and King's Cross, a contribution towards this would be appropriate.
- We understand that consideration is being given by the Council to a new footbridge over the canal at the south eastern end of the site. We do not consider this appropriate due to the cumulative adverse impact of another bridge and would prefer to see an alternative location considered, as well as improvements to the existing Camley Street road bridge and the towpath to assist pedestrian and cyclist movement in the area.

5.12 Canal & River Trust (Second Consultation Response)

Design

- The Trust is encouraged to see that some of the previous comments regarding increasing the amount of public space on the canalside have been considered and the waterside area has been opened out in front of Block C2 and between Ted Baker and C1.
- The revised materials and appearance of the Ted Baker building is also an improvement, although the solid base does result in a less engaging elevation onto the canal.

- The apparent scale of the development has been broken down by recessing the top floors and the use of similar language of Block A and C1 helps to unify the site whilst not resulting in it being monotonous.
- The opportunity to move the Ted Baker building back does not appear to have been taken however, and this does still make the development seem very dense and quite overbearing, especially when viewed from the offside pathway and does seem to create a fairly marked canyoning effect which didn't previously exist.
- The choice of materials and the landscaping both seem to be high quality and the alterations to the facade treatments are an improvement. Although there are improvements to the scheme which benefit the canalscape, the scheme could be further improved.

Impact on structural integrity of the canal

- Comments same as previously provided, noted above.

Impact on water quality of Regent's Canal due to draining proposal

- Comments same as previously provided, noted above.

Impact on biodiversity of the waterway corridor and adjacent moorings

- The revised Daylight and Sunlight report advises following the revisions the Regent's Canal adjacent to the proposed development will receive at least 2hrs of sunlight to 93% of its area on 21st march and therefore not only does this continue to meet the BRE Guidelines for an amenity space but is the same as at present.
- There is a stretch of visitor moorings along the towpath opposite the site, where boats, many in residential use, may moor for up to 14 days at a time, these are in constant use and should be treated as residential properties for the purposes of the site assessment. An additional mooring has been agreed in front of the Ted Baker building.
- Boats often rely on solar panels to help provide electricity for heating and other needs, and if the moorings are overshadowed so that the solar panels don't work, then boats are likely to be reliant on generating power from their engines, which can lead to additional noise and smells. We would like the applicant to consider this potential impact on the moorings, and the application site's future residents further.
- Elsewhere on Regent's Canal, in Islington, we are trialling the use of electricity bollards for visitor moorings. This could be an option for consideration here, which could form part of a S106 agreement to help mitigate the impact of the development.
- To help mitigate the expected overshadowing to the canal from the development, we would expect enhancements to its ecology, in line with Policy A3. There may be opportunities for marginal aquatic planting through floating reeds beds or coir rolls, subject to the agreement of the trust, suitable ongoing maintenance and no impact on navigation. The site may also benefit from environmental enhancements such as bird and bat boxes.

All other comments the same as previously submitted and noted above.

Local groups/stakeholders

5.13 Regent's Canal CAAC(First Consultation Response)

- We consider the site grossly overdeveloped to the detriment of the canal and its environment and that is contrary to the objectives of the Regent's Canal Appraisal and Management Plan.
- Our committee associates with the criticisms of the Canal and River Trust particularly as regards the bulk of Block B.
- We are concerned that it will have a damaging impact on the Canal both residential boats and natural by the removal of the light and sky views.
- On our design opinion; we find the disorganized, miscellaneous group of buildings incoherent as a townscape. The landscaping leads to a complex inconvenient public area, especially for disabled and wheelchair users.
- We invite the Council to refuse this application.

5.14 Camden and Islington NHS(First Consultation Response)

- We have an interest in the outcome of the application, being the freeholders of St Pancras Hospital, located directly to the south of Granby Street and the application site.
- The hospital site offers immediate and rehabilitation care services, which incorporate a number of health and medical-related facilities.
- The site is in a sensitive location, by virtue of its current operational use. The wellbeing of inpatients and the quality of their environment is our Client's priority and should be of consideration to the Council when determining development proposals within the immediate locality.
- The St Pancras Hospital site is allocated for development within the Camden Site Allocations document. The site allocations guidance is for mixed use comprising health and medical related uses and/or permanent housing and other complementary uses.
- No consideration appears to have been given to the St Pancras Hospital site allocation. The Council will need to be convinced that the proposals do not prejudice the delivery of their allocation. The application will need to consider neighbour relations with existing and continuing hospital use.
- The Trust has no objection in principle to the proposed development, but a number of considerations to be raised in relation to the scheme as currently submitted.
- Our site contains noise-sensitive inpatient facilities and whilst these facilities remain operational, matters of hours and uses need to be carefully considered.
- The noise impacts associated with A3 uses along Granary Street depend on the tenant and the nature of the noise sources. It is noted this is a concern within the noise assessment submitted with the application and it is requested the Council condition the details of the glazing for these units and house of use concerning outdoor spaces associated with these.
- Impact on amenity as a result of demolition and construction.

- The draft Construction Management Plan, states workers are to be present on site between 07:00 to 19:00. This is of concern as this could permit works to commence earlier/run later. We request this is removed from the Method Statement.
- It is noted that an up to date Transport Logistics Plan is suggested within the Construction method Statement and request this is included as a condition requirement if approved. It is essential unnecessary noise and vibration disturbance from waiting HGVs, vehicles reversing etc are avoided within Granary Street adjacent to St Pancras Hospital.
- The Daylight and Sunlight report incorrectly list the property types for the hospital building as 'commercial' and the room uses as 'offices'.
- The report notes 35 of 49 rooms assessed as meeting the BRE guidelines and those that fail would be between 0.66-0.78 of their existing values. However the report incorrectly states that all retain at least 75% daylight distribution and will remain well day lit. This is not the case, rooms R2, R3 and R4 will be left with a proposed no sky component of 65%, 64% and 63% respectively.
- We request the opportunity to be involved in future discussions regarding site logistics and construction management to arrive at an agreed position and to avoid adverse impact on current inpatient facilities and their environment

5.15 Friends of Regent's Canal (First Consultation Response)

- The proposed buildings are disproportionate to the width of the canal and they are far too close to the waterside.
- They will undermine and overshadow the canal and will destroy its character as a tranquil open space.
- There are no plans or intentions to make better use of the canal as a transport resource. The application does not illustrate or mention any functional interaction with the canal. This must be addressed otherwise the site will not be future proof and will be a huge missed opportunity.

5.16 Camden Green Party (First Consultation Response)

- Objection to the height and scale of the proposed buildings. The buildings will enclose the canal to the extent that it will no longer serve as a tranquil open space.
- The proposed buildings are out of step when compared to the heights of existing buildings along Regent's Canal to the north and are also considerably larger than the current buildings on the development site.
- The scale and appearance of the buildings are out of character with Camden Town which is predominantly low level with the characteristic terrace housing and commercial properties. The proposal should fit with the local architectural grain and work together with the current locality.
- The proposed buildings would be inappropriately enclosing the canal, resulting in loss of sky and open space. This could be reduced if all buildings were reduced in height and set well back from the canal edge, preferably more than the width of the towpath opposite which is one of the narrowest along this section of the canal and is somewhat restrictive. Lowering the height and setting back the buildings would help to retain

the open character of the Regent's Canal as required in the London Plan policies which categorise London's Blue Ribbon Network as 'open space'.

- Some sections of the existing Ted Baker building are set back and do not oppress the canal scene, especially at the south end.
- We are also concerned about the lack of access points between the canal and the surrounding roads. The development is an ideal opportunity to open up the offside of the canal to allow deliveries from canal boats to road vehicles for onward transfer to the congestion zone. But the proposal is to use the whole waterside as a pedestrian precinct.
- Redevelopment provides an excellent opportunity for using the canal to transfer waste to nearby waterside recycling plants. This is a missed opportunity for reducing unnecessary road traffic.
- The emerging North London Waste Plan promotes the use of the canals for waste disposal, and some of the details of a water freight network are developing. Provision should be made for a wharf facility in the new development to handle the waste. This is confirmed by the TfL response to the application, stating that a condition should be made 'encouraging servicing of the development by canal boat during both site clearance and construction, and once the building is occupied.'
- We are concerned the development could be recreating the equivalent of another 'ugly brown building' for the future.

5.17 The Regent's Network(First Consultation Response)

- The elevations proposed show how out of step the proposed buildings are compared with the heights of the existing buildings along Regents Canal to the north and are considerably larger than the current buildings on the development site.
- The applicants were forewarned by the Regent's Network at a face to face meeting in August 2016 of the importance of Regent's Canal and its intrinsic sensitivities and that they could not expect to be permitted to build tall buildings.
- Development is excessive, even though claimed to be a reduction in scale. It is worrying to consider that the original gross intentions of the applicants could have been for this sensitive waterside site in a significant conservation area.
- The scale and appearance out of character with Camden Town which is predominantly low level with the characteristic terrace housing and commercial properties. The development should fit in the local architectural grain.
- New arrivals are welcome but not if they are intending to turn Camden Town into Croydon or Canary Wharf.
- Building very unsuitable for the special character of the admired canal. Seem 'off the shelf design' rather than carefully and individually designed to suit the heritage waterside setting and to complement it.
- Even if buildings were half the height they would still be inappropriately enclosing the canal and taking away a large patch of sky. This could be resolved if all the buildings when lowered were set well back from the

canal edge, preferably much more than the width of the towpath opposite. This would retain the open character of the Regent's Canal.

- Sections of the existing building are set back and do not oppress the canal scene, especially at the south end.
- The applicant's illustration of a busy and bustling canal is not realistic, our canal are quiet havens and even when bust they are peaceful, steady and calm.
- Boats need not run straight past the site, particularly if redesigned and more attractive. This sort of involvement would be appreciated from waterside properties and of course offers of financial assistance for maintenance and upkeep of the canals.
- There is a direct route by canal from Camden Town to the Waste Centre at Edmonton, the emerging North London Waste Plan promotes the use of the canals for waste disposal and some of the details of a water freight network are developing. Even though not up and running provision should be made for a wharf facility at the development to handle waste. This is confirmed by TfLs response requiring a condition to encourage servicing by canal boat during site clearance and construction and once occupied.
- Concern applicant refers to buildings as the visual centrepiece and that building have a distinctive character yet there is nothing to give any credit to the heritage of the canal. The canal is the centrepiece of the locality and the new buildings should not take that away. Concern applicant does not given the canal its due appreciation but exploits the canalside location and the financial gain that it provides with an overdevelopment.
- The Canal elevations has some serious shortcomings with excessive balconies.
- Consider the applicant have overlooked London Plan Policy 7.24 which notes the starting point for consideration of development and use of the Blue Ribbon Network and land alongside it must be the water. The water is the unique aspect.

5.18 The Regent's Network(Second Consultation Response)

- It cannot pretend that the proposed development will not negatively affect the Regent's Canal. Just look at the size of the buildings that will run along the bank of the canal and the conservation area. The current building may be ugly but it is of an appropriate scale and fits with the historic industrial character of the canal.
- It would not be fair on residents and locals, nor the visitors to Camden Town for this wonderful stretch of open waterspace to be ruined by a bulky and solid development. Parts are set back which does not reduce the bulk at all.
- There seems to be a larger area of windows overlooking the canal in the revised design, which will flood the Regent's Canal and conservation with light at night, as the applicant shows in one of their computer generated images.
- The light pollution will also affect the residents opposite on the other side of the canal.

- Mystified by applicants comment about key changes in revised design, does not mention anything about the huge, overbearing bulk of the proposed buildings which is one of the main objections from the community and residents and the Camden Journal headline.
- The buildings appear to be of a very similar bulk and height as the previous application.
- Although applicants may have gone through the 'consultation routine' with the residents, community and number of other authorities and stakeholders, they have been selective in their consideration and respect for the responses.
- Comments and assurances from the applicants and their planning team were mainly in the form of excuses and were selective and non-committal to gloss over any concerns.
- Revealing to note how out of place the development is in the characteristic low level housing and buildings of Camden Town.
- It is the bulk and height of the building closing in on Regent's Canal and the open space that needs to be solved not the general appearance.
- The applicants were made fully aware of the limitations of the site and relevant planning policies. The question to be asked of them is why they decided and agreed to proceed with their development when it does not comply.
- They attempt to justify the height and bulk by the fact there are tall buildings along the canal to the south. However it is regretted that 101 and 103 Camley Street were given planning consent by LB Camden, in spite of the fact that they have serious negative effects on the Regent's Canal and conservation area.
- One of the excuses to justify buildings is the proximity to the Kings Cross Opportunity Area, however they are not in the Opportunity Area and what is known as the 'opportunity creep' is strongly opposed.
- This development cannot be permitted to stretch the 'opportunity creep' so much further along the Regent's Canal and more remotely from the Kings Cross development. Not can neighbouring buildings be claimed to set a precedence. It is confirmed that 'precedence' is not a planning consideration and the term cannot be found in any planning documentation.
- Not much is heard from the applicants about policy, the majority of their comments and justifications are interpretations of their wish list.
- Policy 2.18 of the London Plan states that London's Blue Ribbon Network is defined as open space. Consequently this means the waterways have the same consideration and protection as a park. The applicant would not attempt to build such a huge bulky buildings beside a park of course, so why has this application been submitted for such gross buildings to be built alongside the Regents Canal in Camden Town that will plainly enclose the valuable open space.
- Policy 7.28 of the London Plan states development should restore and enhance the Blue Ribbon Network by protecting the open character of the Blue Ribbon Network. Huge wall of multi-storey buildings running along the canal cannot be said to be doing anything positive for the canal.

- The canal is a significant man-made heritage asset. Parliament designated canals as a public asset. This enables the Regent's Canal to be recognised as a heritage asset in the Borough.
- The Regent's Canal is still a heritage asset even though not officially identified by the borough it falls under the NPPF definition of a heritage asset. The Council could register the Regent's Canal as a heritage asset, but it is not necessary. However the Borough should realise that it has a big responsibility for the care and protection of a section of a national asset.
- Although there is no objection to appropriate development alongside the canal network, this proposed development with its strong negative effect of the height and bulk is seriously detrimental to the Regent's Canal and its environmental and open space attributes.
- None of the excuses and justifications from the applicants and their consultants will reduce the potential harm and degradation of one of Camden's important heritage assets.

5.19 Inland Waterway Association (First Consultation Response)

- We welcome the opening up of an active frontage to the canal on this site and consider it an appropriate location for taller buildings.
- We support the comments from the Canal and River Trust (CRT) in relation to the possibility of further opening up the active frontage and to minimise the loss of sunlight onto the canal.
- The statement in the application claiming very limited loss is not supported by evidence and needs further proof/consideration.
- We welcome the commitment to evaluate use of the canal during demolition and construction and recommend that this be made a binding condition.
- We welcome mooring points alongside the site, in view of growth of informal mooring opposite the site on the towpath side we would wish to be assured that these would be agreed with CRT in the context of the developed London Mooring Strategy and that the navigable width of the canal would not be further constricted.

5.20 UK Power Networks (Second Consultation Response)

- The proposals cover 3 substations at this site so the relocation and larger implications on the electricity network need to be considered as part of this development. UK Power Networks needs to be approached as early as possible to discuss the plans and design for the electricity demand for the scheme along with the wider network.

Individual Responses

Letters of objection – first consultation

- 5.21 As a result of the first consultation, 10 Objections were raised on the issues outlined below. These issues raised are considered in the relevant section of this report.

Open space

- The development will block sun and sky, overshadowing the water and the busy and popular canal towpath. The development is not in the public benefit, as it is detrimental to the enjoyment of the towpath, a key traffic-free route between east and west London.

Design and conservation

- This will take the canal frontage to an unprecedented height which will encourage others to do the same, create a canyon effect and change the character of the canal irreversibly.
- The proposal is overscale for the canal setting and its surroundings.
- The design does not integrate the canal to the surrounding community and streetscape – a missed opportunity.
- The canyoning of Regent's Canal is to be deplored. The canal is a precious green corridor through a built-up urban area of London.
- The proposal adds no character or benefit to the area, similar to the development at King's Cross you could be anywhere in the world. I see no attempt to reflect the vernacular of the 19th century canal, or to reflect the pleasant quiet green neglect of the 20th century.
- I protest to an inappropriate development of tall buildings casting the canal into permanent shade and gloom.
- I understand the Council need more so-called 'affordable' housing in the borough, but why can't the Council raise the bar on good design and architecture which I am not seeing anywhere in this scheme.
- The height, scale and massing of the proposal will not preserve or enhance its setting on Regent's Canal a Conservation Area and metropolitan open space.
- The damage inflicted to the canal is greater than that of the Camley Street Trio.
- Concern that the Ted Baker headquarters will put 'Ted Baker' branding on the canal as they want to make it known this is the company HQ.
- The design and architecture should benefit this tranquil area. The collection of buildings, the courtyard design and the wall of glass shopfronts are likely to give the appearance of a shopping centre right on the canal edge.
- It is also of concern that if another bridge is built in this area, pedestrians will then have to walk under a dark stretch of covered towpath, given that there are road and rail bridges here already. This can create a feeling of insecurity. Somers Town bridge provides a new crossing nearby.
- If you want to destroy the whole character of the Regent's canal and ruin a charming feature of London, then this is the way to go.
- The proposed scheme has appallingly high frontage, no connection with surrounding road, soul-less, could be anywhere in the world.
- What about the character of this wonderful city, is Camden planning going to be responsible for killing it.
- There have been so many high developments all around Kings Cross over the last few years, in terms of money and size. The area has changed beyond recognition, albeit not all bad. This will really overshadow that

poor little canal which has gradually been blocked out, all the way down from St Pancras Way.

- We need to preserve the use and also look and heritage of our canal.
- The sense of London's history is gradually being eroded as more and more of these old buildings disappear.
- When I moved to Rosendale Way in 1984, we were told the height of the Ugly Brown Building was the height limit of buildings along St Pancras Way. Some buildings on St Pancras Way increased their height but there was never ever consultation. Now the canal is a dark unfriendly abyss in the winter.
- Please keep this to less than 6 stories and back from the canalside.

Amenity impact

- The proposal would contravene BRE guidelines, my suggestion is a maximum of 5 stories, with any additional roof stories being set back 45 degrees on leading edges.

Transport

- The proposal misses several opportunities to connect the operational side of the canal with the surrounding roads and the current plans will reduce the canal to an ornamental water feature rather than a major component of an integrated transport strategy

Principle of development

- Everyone will lose out by this development canal users, walkers, residents nearby, and the space to regenerate viable canal transport with wharf access will be lost. It is impossible to assess the amount of damage this application, if upheld, will do to the local environment.

Letters of comment – First Consultation

5.22 1 Letter of comment was received from the owner of an adjoining building, making the points laid out below.

- In the capacity of the building owner and occupier, we think that overall this application is a positive step in the regeneration in this part of Camden.
- The employment uses will bring an excellent mix of uses into the area and should be applauded.
- However, we have some concerns about the design; the commercial 8 storey building at the north eastern end of the site, that is hard up against our building, is going to be very abrupt step in massing and street scale terms when viewed along St Pancras Way looking south. This building should have one floor removed or at least a significant setback on the top floor.
- We have planning permission to put photovoltaic panels on our uppermost roof which will be shaded from southern sunlight by this building.
- It is important that high quality cladding materials are used so that the new development ages gracefully.

Letters of support – Second Consultation

5.23 4 Letters of support were received summarised as follows.

- Fully supportive of the initiative and looking forward to having a new building.
- It would be good to have this type and calibre of establishment in the vicinity. I very much look forward to its completion and being able to visit.
- I attended the planning meeting a while ago when it was held and was fully satisfied with the development. I'm also extremely happy about what this will do to transform the area.
- Please accept this project in full for the sake of the neighbourhood.
- The project will transform St Pancras Way in an extremely positive way and the new public spaces look fantastic.
- The job creation and new local businesses is just what the area needs and having a hotel location on our road will be terrific.

Development Management Forum

5.24 A Development Management Forum was held 7th March 2017, it was attended by 26 members of the public, including representatives from amenity groups, local politicians and interested individuals. A summary of the comments made by residents is summarised below:

- Concern regarding the height of the development and impact on the canal.
- Concern about the impact of construction on the local community.
- Increased traffic in the area and the impact this would have.
- Questions regarding the level of affordable housing being proposed.
- Proposals provide a good opportunity to open up and provide public access to the canal, concern regarding safety and impact of wind walking along towpath.
- Proposals provide good opportunity to include green roofs.
- Positive response on commercial spaces and important that Ted Baker retain a presence in the area.

Developer's Briefing

5.25 The proposals were presented to a Developers Briefing in April 2017. The meeting was attended by 3 Councillors, a summary of the comments is provided below:

- There are a number of housing developments around this site, regulation of noise from the development will be required.
- A working group will be required to limit the disruption of the development.
- Question asked as to how the applicant envisages the development being used. Will it be active during the week or weekend, what will encourage people to use the development.
- Can the development provide a possible contribution towards a bridge across the canal.

- What are the economic benefits of the proposals, could it link to the University of the Arts located in the Granary building. Links to secondary schools with design.
- The height in relation to the hospital site, understand there is a brief for this site being development will it remain such a low building.
- How are the balance of uses addressed on site.
- Is there enough open space?
- Possibility of proposing starter units for the commercial space.

Design Review Panels

5.26 The proposals were first presented to the full Camden Design Review Panel in November 2016, a summary of the comments are provided below:

- Panel welcomes mixed use development of this important site and provision of enlarged accommodation for the existing Ted Baker headquarters.
- The principle of redevelopment around a new network of routes and spaces promises to improve access across the site and connections to the surrounding area. The panel recommended further thought about the arrangement of these routes and spaces and the assumptions made about future development of the hospital site to the south.
- Panel is not convinced by the scale and massing of the development. Consider the site should create a transition between Kings Cross Central and lower scale neighbourhood around Royal College Street. The Camley Street buildings should be a high point along this stretch of the canal and proposals should step down below this.
- Mass and arrangement of forms do not allow sufficiently generous public spaces within the scheme and the proposed central square feels dominated by the surrounding buildings.
- Panel encouraged further thought about the distribution of uses, especially at ground level.
- There may be an opportunity to create a place with special character, by providing affordable workspace that adds to the vibrancy promised by the new Ted Baker building.
- Panel considered that a more direct relationship with the canal edge, informed by historic building lines would be more successful, rather than providing continuously-linked public spaces along this edge.
- The relationship of buildings on St Pancras Road need further development, the form should re-inforce the sweeping curve of the road, whilst being set back to encourage pedestrian use.
- Further consideration given to a bridge in the northern part of the site.
- Architectural expression of the buildings does not respond to the specific character of the canal and needs further design development together with public spaces.
- Design the Ted Baker building may be too monumental and could have a friendlier and more informal character, whilst retaining its distinctive role as a set-piece within the wider development.

5.27 Prior to submission of the application the proposal was presented to the full Camden Design Review Panel in March 2017, a summary of the comments are provided below:

- The panel congratulates the design team on the way the scheme has developed since the previous review.
- The scheme responds positively to its pivotal location, on the canal between Camden and King's Cross.
- Panel supported the height, scale and massing of buildings, the layout of routes and spaces and finds much to admire in the way the architectural expression is evolving.
- A greater variety in the roofscape could also enhance the character of the scheme and the panel would support raising heights in some areas and reducing it in others.
- The panel would encourage further thought about the ground floor uses and nature of public space in different areas of the site. It would be valuable to explore ways of generating activity both during the week and weekend including the scope for community use.
- The canal side space to the south east corner could be a very attractive sunny spot and the panel would encourage the design team to make this as generous as possible.
- The panel admired the distinctive Ted Baker building. Could be more scope for the development to have an experimental feel.
- For the office buildings the panel would encourage the team to avoid a 'corporate' architectural expression and explore a simpler architecture, more suitable for start-ups and creatives. Giving the residential building more domestic character could also add to the variety and interest of the scheme and create a contrast.
- Scope to refine the architecture to create a more domestic, less corporate character where residential use is proposed.
- Developing landscaping in parallel with architecture will be essential to the quality of place created. Potential for central area to be divided into two areas once relating to the canal and one to St Pancras Way. Additional tree planting has the potential to enhance the scheme. Clarity over the phasing to identify when the open space would be coming forward.

5.28 Following revisions, the proposals were presented to a DRP Chairs Review, during the course of the application for the final time in March 2018 a summary of the comments are provided below:

- The panel felt the scheme had development significantly since it was first reviewed and has improved in terms of layout and massing.
- Whilst the façade treatment is generally improved, the architecture of the scheme as a whole would benefit from greater variety and richness. It questioned if a wider range of designers might be involved in the detailed design stage of the later phases of development to introduce more variation between the buildings.
- The unified palette of materials is generally a positive aspect, the panel felt there is scope for more variety in the detail to avoid monotony,

- The panel felt the dark brick used on the lowest floors of the Ted Baker building is too dark and felt the same about the pavilion building and consider it would benefit from more varied, lightweight materials.
- The Ted Baker building offers the opportunity to express the character and function of its occupiers, through a more exuberant and playful design.
- The ground floor level of Building A seems too low and constrained, lacking a sense of generosity. Introducing a double height ground floor element would enhance the civic presence of this building and help differentiate the architecture of Buildings A and C2.
- The north elevations of Building A and C2 would benefit from further thought to reduce the extent of blank facades.
- The link bridge between C1 and C3 is inappropriate for a city street and will block important views as well as intruding on residents in adjacent flats.
- The panel recommends more detailed information on the landscape should be provided, to demonstrate the spaces will be attractive and well used.

6 POLICIES & GUIDANCE

6.1 National Planning Policy Framework 2012(NPPF)

6.2 The government published a draft revised National Planning Policy Framework (NPPF) for consultation in March 2018. The current NPPF advises that from the day of publication, decision-takers may give weight to relevant draft policies according to their stage of preparation (the more advanced the preparation, the greater the weight that may be given). Therefore, policies in the draft NPPF are material considerations. However, they should be given limited weight at this stage in the process as there is no way of knowing whether policies will ultimately be adopted. Officers have had regard to the policies set out in this emerging document in assessing this application.

6.3 National Planning Practice Guidance (NPPG)

6.4 The government has also issued draft guidance to accompany the draft NPPF. It is a material consideration but of limited weight at this stage.

6.5 The London Plan 2016

6.6 Mayor published a draft of the new London Plan for consultation in November 2017. It is a material consideration but also of limited weight at this stage.

6.7 Mayor's Supplementary Planning Guidance

6.8 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

- H3 Protecting existing homes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- C1 Health and wellbeing
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- E3 Tourism
- A1 Managing the impact of development
- A2 Open space
- A3 Biodiversity
- D1 Design
- D2 Heritage
- D3 Shopfronts
- 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
- TC2 Camden's centres and other shopping areas
- TC3 Shops outside of centres
- TC4 Town Centre uses
- TC5 Small and independent shops
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

6.9 Supplementary Planning Policies

Camden Planning Guidance

- CPG Housing (interim) (2018)
- CPG Amenity (2018)
- CPG Basements (2018)
- CPG Biodiversity (2018)
- CPG Employment sites and business premises (2018)
- CPG Planning for health and wellbeing (2018)
- CPG Public Open Space (2018)
- CPG1 Design (2015, updated March 2018)
- CPG7 Transport (2011)
- CPG8 Planning obligations (2015, updated March 2018)

ASSESSMENT

The principal considerations material to the determination of this application are considered in the following sections of this report:

7.0	Land use
8.0	Tenure and unit size mix of the proposed housing
9.0	Amenity of proposed housing
10.0	Design and Conservation
11.0	Landscaping
12.0	Nature conservation and biodiversity
13.0	Impact on neighbouring amenity
14.0	Land contamination
15.0	Basement impact
16.0	Air quality
17.0	Sustainable design and construction
18.0	Flood risk and drainage
19.0	Microclimate
20.0	Accessibility
21.0	Transport
22.0	Canal bridge
23.0	Safety and security
24.0	Refuse and recycling
25.0	Health and wellbeing
26.0	Employment and training opportunities
27.0	Community Infrastructure Levy (CIL)
28.0	Planning obligations

29.0	Conclusion
30.0	Recommendations
	Conditions

7 LAND USE

7.1 As existing the site is has 26,190sqm of B1a office accommodation spread over 3 buildings. The proposed development would provide the following mixed uses:

Proposed Use (Use Class)	Floorspace in sqm (GIA)	Floorspace in sqm (GEA)
Office (B1)	54,247	56,171
Residential (C3)	7,561	8,203
Flexible Retail (A1-A4)	2,692	2,938
Flexible Retail (A1-A4, B1)	2,370	2,603
Flexible Retail (A1-A4, B1,B8)	1,042	1,142
Gym (D2)	1,601	1,692
Hotel (C1)	4,823	6,333
Storage (B8)	6,011	6,229
Total	80,347	85,310

Table 2: Areas of proposed land uses

Principle of large-scale development

- 7.2 Policy G1 notes that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes the best use of its site, resisting development that makes inefficient use of Camden's limited land. G1 also seeks the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough. The policy notes development will take place across the borough with the most significant growth within the designated Growth Areas.
- 7.3 It is acknowledged that the application is not located within the King's Cross Growth Area, however it is in very close proximity to the Growth Area as shown in Figure 3 below.
- 7.4 Furthermore when considering the principal of the development with the objectives of Policy G1, it is evident that this is an appropriate redevelopment. For example the site is in a highly accessible location, would provide a mixture of uses comprising commercial, residential both private and affordable and leisure uses. It is therefore a suitable site for a large scale development such as that proposed and the principle of development would accord with the objectives of Policy G1. The Council has had regard to the emerging Camley Street Framework; however,

as this has yet to be completed and no consultation has been undertaken, it has no weight in the determination of the application.

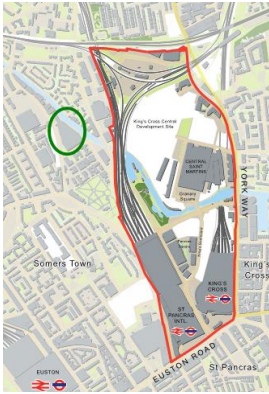


Figure 3: Site circled above to show proximity to Kings Cross Growth Area.

- 7.5 In considering the principle of development, it is important to consider Policy TC1. TC1 seeks to focus new shopping and related uses in Camden's designated growth areas and existing centres. The policy notes that outside of these designated areas the Council will apply a sequential approach to retail and other town centre uses. In accordance with Policy TC1 as the site is not located within a designated centre and would contain more than 2,500sqm of retail space the applicant has provided a Retail Impact Assessment (RIA). Policy TC4 defines Town Centre uses to include A1-A4, B1a and D2 uses.
- 7.6 The RIA uses data from the 2013 Retail Study which is the same evidence base used for the Local Plan (2017). The Retail Study identifies a borough wide capacity for around 32,343sqm of net additional convenience and comparison goods floorspace by 2031, after taking account of known commitments, including King's Cross. The Retail Survey does not quantify floorspace needs for A1-A5 floorspace as such the applicant has expected that adding in these needs would increase the estates by 30-40%. Please note this does not include B1a and D2 uses.
- 7.7 In terms of identifying the need for retail uses in the area, the RIA has considered the nearest local centres at Crowndale Road and Royal College Street, 4 and 6 minute walk from the site respectively. Both are considered to provide limited retail provision which serves the immediate residents and workers. It is envisaged that the proposed development would generate £663,350 per annum spend on A1 uses in addition to spending in cafes/restaurants for the residential users of the site. For the commercial space(B1 and A1-A4) it is likely to generate 4000 full time jobs which would result in some £1.81million spend on retail, cafes/restaurants and local services from the future workforce on site. Further to this would be the demand from users of the Hotel and gym.
- 7.8 It is expected that of the flexible workspace (6,104sqm), 2,320sqm would be A1 net sales floorspace. This would result in a maximum potential turnover of £15 million per annum. Therefore over a period of up to 2023 and by completion in 2026 the proposals would be supportable based on locally generated expenditure growth.

- 7.9 It has been identified above that there is a need for improved retail and service uses in the application site, given the increased number of residents, workers and users of the site together with the existing residents and workers that are in close proximity to the site. It is most logical that this need is met by the development to maximise on the opportunity the site presents and to provide a viable mixed use development which would be sustainable in terms of placemaking and creating active frontages.
- 7.10 However in accordance with Policy TC1, the applicant is required to consider the nearest designated centres to identify if there are any alternative sites within designated centres which would meet the required need. In applying this sequential approach, as requested by Policy TC1, the applicant has considered the nearest centres. The Crowndale Road and Royal College Street are designated Neighbourhood Centres which would not have the capacity to meet the demand created by the development. The next nearest option would be the Coal Drops Yard located within King's Cross Central. This would have the capacity to meet the demand created by the development. However, as noted within the applicants RIA the marketing is seeking retail units of a more aspirational fashion and lifestyle targeting visitors to Kings Cross Central, rather than meeting the needs of the locality. Furthermore the demand created the by the proposed development is over and above that generated by the Kings Cross Central development whereby the demand generated is met on site by developments such as the Coal Drops Yard.
- 7.11 Looking further north to Camden Town which is a designated Town Centre, the applicant has considered sites identified in the Retail Survey and concludes they would not be suitable, viable and available to accommodate the proposal as a whole.
- 7.12 In light of the above, in applying the sequential approach the applicant has demonstrated that there are no suitable sites within designated centres available to be able to accommodate the demand that would be generated from this development. Furthermore in order to provide a sustainable mixed use development is accepted that retail space is appropriate on this site. In order to consider the impact of the proposed retail use the applicant has tested two alternative scenarios; one where all the A1 floorspace is occupied by convenience retailers and the second assumes 100% comparison retail scheme. The conclusion from scenario one is that the impact would be negligible with the only Town Centre to experience an impact being Camden Town but this would be a 0.76% decrease in trade which is considered to be minimal. It is likely the impact would be somewhere between the two scenarios, it is therefore concluded that the impact of the proposed development on surrounding retail uses would be negligible.
- 7.13 Given the principle of a mixed use development is considered acceptable in this location, below each of the proposed uses are outlined and assessed concluding in an assessment of how the proposed uses would work alongside each other but also within the context of the surrounding area.

Flexible Uses

- 7.14 The proposals include 3 forms of flexible use space;
A1-A4 2,692sqm (GIA)
B1, A1-A4 2,370sqm (GIA)
A1-A4, B1, B8 1,042sqm (GIA)
- 7.15 No objection is raised to proposing flexible uses to the units as noted above these will aid in creating a sense of place and aid in the vitality and viability of the area. To ensure a balanced mixture of uses so the entire ground floor does not evolve into one use across the ground floor, it is recommended that conditions be used to manage the uses on site. It is recommended that 60% of the flexible floorspace shall be in A1 or A2 use at any one time with a view to provide an area with character, vitality and viability.
- 7.16 Further to this it is recommended that a maximum of 40% of the flexible floorspace in use as A3 and 10% in A4 at any one time to prevent an overconcentration of food and drink establishments. A condition is also recommended which states that no more than 66sqm of the ground floor area within Plot A is used as an A4 drinking establishment, with a view to secure a mixture of uses to the ground floor of Plot A and safeguard the amenity of the neighbours to the opposite side of St Pancras Way and to the north at 8 St Pancras Way.
- 7.17 It is also recommended to condition that there shall be a minimum of 4 small units(100sqm or less) at any one time, with a view to securing smaller units on site. The ground floor had been designed in a manner that the units could be further subdivided into smaller units which would be welcomed. It is recommended that a retail strategy is secured via Section 106 legal agreement which outlines how the commercial ground floor uses will be laid out, marketed and operated to ensure the provision of a viable and vibrant area.

Office Accommodation B1

- 7.18 As existing the site accommodates 26,190sqm (GIA), the development is proposing to increase this to 54,522sqm (GIA). Policy E1 seeks to support Camden's industries by supporting proposals for the intensification of employment sites and premises in where these provide additional employment and other benefits in line with policy E2.
- 7.19 Policy E2 seeks to ensure that proposed development include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable. Officers have negotiated the provision of 1,858sqm of affordable workspace which would be marketed at 50% of market value and retained for 50 years. This provision is sought to ensure the aspirations of Policy E2 are achieved. Such a provision equates to 3.4% of the total B1 floorspace or 6.6% of the uplift in B1 floorspace. 1,858sqm is a significant amount of space for a managed workspace provider and will allow the provision of space for a range of start up and medium sized businesses. It is considered such a provision is welcomed and would adhere to the objectives of Policy E2.

7.20 Policy E1 does not set out a floorspace requirement for affordable workspace, instead placing an emphasis on using planning obligations to secure an element of affordable workspace from large scale employment developments. To this end measures to secure the affordability of the space and the terms of how it is offered to the end user businesses would be secured via the legal agreement heads of term 'Affordable workspace'. Officers are also seeking to secure the fitout of the affordable space to a level which is more affordable-operator friendly than 'shell & core'.

7.21 As existing the site accommodates Ted Bakers Headquarters where they have been located since 2000. The proposed development would provide a larger area for Ted Baker to operate from within building B together with the Ted Baker hotel. The development would enable the retention of a large business within the Borough which would contribute towards sustainable economic growth which would be in accordance with the aspirations of policies E1 and E2 and as such is supported.

Residential (C3)

7.22 Policy H2 requires a mix of uses in new developments, including a contribution to the supply of housing. The policy notes specific requirements with regard to development within the Central London Area and designated Town Centres. Given the site is not within any of these designated areas, these requirements do not apply. However the applicant is proposing 73 residential units, which is an increase upon the 69 originally submitted. 20 of these units would be affordable housing. Full details of affordable housing will be assessed in full. All residential units would be located within building C1 which is located to the southern part of the site along the canal frontage.

7.23 As outlined within Policy H1, housing is the priority land use within the Borough and the Council would strongly support the provision of housing. It is therefore considered that no objection is raised to the proposed provision of residential units.

Gym (D2)

7.24 As outlined in Policy C3, the Council will seek opportunities for new cultural and leisure facilities in major, mixed use developments. The proposed gym would be located within the basement level of the development beneath Plot C. It is considered that given the scale of development, it would appropriate to expect the provision of a new cultural and leisure activity. It is likely would be used by future occupiers of the development together with the local community and would therefore be supported.

7.25 To ensure that the area is not used for any other use that falls within the D2 Use Class such as concert halls, casinos, cinemas or dance halls a condition is recommended which restricts the use of the floor area for anything other than a gym, given the different way in which other D2 uses would operate.

Hotel (C1)

7.26 Policy E3 notes that the Council recognises the importance of the visitor economy in Camden. It notes that hotels are expected in the Central London and Growth

areas together with Town Centres. However the Council will consider tourism development outside of these areas where it would have a local or specialist focus and attract limited numbers of visitors from outside the borough. Furthermore other locations may be acceptable provided they are highly accessible by public transport and do not harm amenity, the environment or transport systems.

- 7.27 The proposed hotel would provide 87 beds covering a floor area of 4,913sqm and would therefore be considered a large scale tourist development. Although it would not be located with Central London or the nearby King's Cross Growth area, it is within very close proximity of these areas and is still a highly accessible area.
- 7.28 The site is a short distance from St Pancras International Train Station and King's Cross Train Station and given the hotels location within the site it will not impact on amenity. With regard to the environment, it is considered the proposal would provide a sustainable development in accordance with the objectives of the NPPF. In terms of its impact on the transport system this will be assessed in full within the Transport Section below.
- 7.29 It is also important to note the proposed would provide a specialist focus. Ted Baker who currently occupy Plot B of the existing site will be launching their first Ted Baker branded hotel and will therefore have a specialist function in associated with other proposed uses on the Plot. Officers are also mindful of the importance retaining the Ted Baker head office in Camden and how this will ensure a sustainable economy.
- 7.30 It is therefore considered that the proposed hotel use would be acceptable in this location and in accordance with the objectives of Policy E3.

Storage (B8)

- 7.31 To the Basement Level B2 beneath Plot C it is proposed to include a storage area of 6,011sqm. The supporting text within Policy E1, namely paragraphs 5.28-5.31, acknowledge that there is a limited amount of industrial and warehousing stock within the Borough and supply does not meet the demand. Given its proximity to the Central Activities Zone, this is considered a good location for a B8 use, where it could aid in supporting and benefiting from the Central London economy. Furthermore as noted in paragraph 5.30 the proposed use would provide jobs for people who would otherwise be at a relatively high risk of being unemployed.

Phasing

- 7.32 As noted above in the proposal section, the development will be built out in 3 phases. The first two phases Plots A and B will provide solely commercial use with no residential accommodation and only a minor open space provision, in the form of the planting to the canal side and north of Plot B. Plot C which includes the residential and majority of the open space is proposed to be brought forward in 2023.
- 7.33 The provision of housing and on-site open space are two of the benefits the development would provide and the provision of this ideally would be delivered in

the first phase. However this is not possible in this proposal due to the current lease on Plot C.

7.34 With regard to the open space, CPG Public open space notes that commercial uses (Use Classes B1, B2 and B8) should provide 0.74sqm of open space per worker. The proposals would provide 3,635 full time jobs, as existing there are 630 jobs across the three building. Therefore the net increase in jobs is 3,005 which would equate to the requirement of 2223.7sqm of open space.

7.35 The draft phasing plan that has been provided, demonstrates that Plot A would not bring forward any real open space, only public realm that surrounds the building and is required for access, Plot B would bring forward around 830sqm in the form of planting and opening up of part of the canal. It is recommended that a condition secures the open space provision around Plots A and B are implemented before the respective plots become operational. It is also proposed to secure a phasing plan via condition to ensure once the proposals have been taken to the detailed design stage the development is built out in a planned manner which would safeguard neighbouring amenity.

7.36 With regard to Plot C, a condition will secure that the remaining open space will be provided prior to the occupation of any buildings within Plot C.

7.37 To mitigate against this delay in delivery, officers have considered it necessary to seek a package of measures to mitigate the phasing and delivery delays. Officers have sought the following contributions which would be secured via a Section 106 legal agreement:

- £1million towards the construction of a bridge over the canal and a commitment that the applicant would lead on delivery of the bridge;
- £381,694 towards affordable housing;
- The applicant has been in discussion with a local charity, Scene and Heard with a view to providing them with 346sqm of floorspace at a rate of 30% of the market value for a period of 10years;
- A package of post construction local employment benefits, over and above the policy requirement, from Ted Baker or other occupiers of the development including:
 - 3 apprenticeships each year for 5 years;
 - 6 work experience placements per year to Camden Schools for 5 years, at no less than 2 weeks long;
 - 1 supported internship for a Camden residents with Learning Disabilities for a minimum of 1 year and linked into an employment opportunity at the end of the placement.
- Ted Baker to commit to the Camden STEAM Pledge by becoming a Bronze STEAM Employer and identify 10 STEAM Ambassadors per year from their staff to support the work of the STEAM Hub and engage with schools and young people through creative, digital and scientific learning.

7.38 Officers consider the above package to be a good comprehensive proposal of public benefits which would mitigate against the delays as a result of the phasing of the development. A phasing plan is required by S106, see heads of terms in section 28 below.

Conclusion; land use principles

7.39 In light of the above, it is considered that the proposal would create a good mix of uses which will contribute to growth within the Borough which is in accordance with the overall objectives of the Local Plan. In terms of land use, the development would provide a number of the key priorities as set out in the Local Plan including the provision of new homes, including affordable homes and supporting businesses and job provision. Of the other priorities, securing infrastructure and services and protection of amenity, these will be discussed in detail in the relevant sections within the report. Officers have negotiated a package of additional benefits to mitigate delivery delays that would result from the phasing proposed.

8 Tenure and unit size mix of the proposed housing

8.1 The considerations with regards to tenure and unit size and mix are as follows:

- Policy review
- Mix of unit sizes
- Tenure mix
- Assessment of proposed tenures
- Viability and affordable housing

Policy review

8.2 The Local Plan has a range of policies relating to targets for the overall number of additional homes and additional affordable homes that are expected to be building within the Borough. These include policies H1, H2, H3, H4, H5, H6, H7 and CPG2 (Housing) are relevant with regards to new housing, including to tenure and unit size.

Mix of unit sizes

8.3 Policy H7 requires homes of different sizes. The proposed unit mix should broadly accord with the Dwelling Size Priorities Table in this policy, although the Council will be flexible when assessing development.

8.4 The proposed unit mix across the whole site is as follows:

	1-bedroom (or studio)	2-bedroom	3-bedroom	Total
Social-affordable rented	0	3	7	10
Intermediate rent	7	4	0	11
Market	32	20	0	52
Total	40	27	7	73

Table 3: Mix of proposed residential units

8.5 The Dwelling Size Priorities Table within Policy H7 notes that for social rented units, 2 and 3 bed flats are within high demand and for intermediate 1 bed units are also

in high demand with 2 bed units being in medium demand. The proposed unit mix for the affordable units responds well to the needs of the Borough and in accordance with Policy H7.

8.6 With regard to market housing, the Table within H7 notes that 2 and 3 bed units are in high demand and 1bed/studio and 4 bed properties are in lower demand. The proposal includes 20 out of 53 units as 2 bed and the remaining 33 as 1bed or studio. The supporting text within H7 notes that it is expected that developments would include dwellings noted as being in lower demand and that the Council will be flexible when assessing development against H7. The mix of dwelling sizes will be appropriate to the character of the development. The development would be addressing the high demand for 2 bed units in providing 38% of units. Although the majority would be 1 bed or studio units, it is considered that when considered overall in the context of both the affordable and private market units, the development there would be the provision of a good mix of units to achieve a mixed, inclusive and sustainable community which is the overarching aim of Policy H7.

Tenure mix

8.7 London Plan policies 3.10, 3.11 and 3.12, Camden Local Plan policy H4 and CPG2 (Housing), seek a target provision of 50% of housing be defined as affordable for developments with a capacity of 25 or more additional homes, with a sliding scale operating for smaller developments.

8.8 Overall the development is proposing 22 units of affordable housing over a floor area of 2710sqm (GIA). This equates to 35.8% affordable housing based on floor area which is the Council's preferred method of calculation affordable housing provision. The proposals are therefore not meeting the policy target of 50%. A viability report has been provided to justify the shortfall in the provision of affordable housing. This is discussed below.

8.9 The split of the affordable housing provided should be 60% social rented and 40% intermediate. Of these 22 units, 10 would be social rented and 11 intermediate. Based on unit number, this results in a split of 48% social rented and 52% intermediate rent. However based on floorspace this results in 57% being social rented and 43% being intermediate rent, this is due to the provision of a large number of 3 bed units. Of the 10 socially rented units 7 will be 3 bed and 3 will be 2 bed. Although there is a shortfall of 3% based on floor area, this is considered minor and of the 35% proposed it would meet the needs of the Borough.

8.10 The affordable units would be located to the south western side of building C2 with the social rented units located at 1st to 5th levels and the intermediate at 6th to 9th levels.

Assessment of proposed tenures

London Affordable Rent (previously social rent)

8.11 The applicant proposes London Affordable Rent as the tenure for the general needs units within this scheme. The Government stipulates that on a national level affordable rents can be anything up to 80% of market. Since the affordable rent

regime was introduced in 2012 Camden has had concerns with regard to the affordability of this product, and has sought to secure target social rent as a priority.

8.12 The Mayor of London, through the publication of 'Homes for Londoners – Affordable Homes Programme 2016-21' echoes these concerns and does not consider 80% of market to be genuinely affordable in most parts of London. The Mayor has therefore introduced London Affordable Rent, the starting point for which will be rent benchmarks set against the average formula rent caps across London (target social rent). The LAR benchmarks for 2017/18 are as follows (weekly rents, exclusive of service charge);

- Bedsit and one bedroom £150.03
- Two bedrooms £158.84
- Three bedrooms £167.67

8.13 These benchmarks will be updated each April by the increase in CPI (for the previous September) plus one per cent and updated benchmarks will be published by the GLA on an annual basis.

8.14 Officers welcome the introduction of London Affordable Rent, both generally and within this scheme, because it provides a genuinely affordable form of general needs housing. The proposed rent benchmarks are significantly lower than affordable rent values which can be set at anything up to 80% of market, and the benchmark rent levels are broadly similar to target social rents secured in Camden over the past two years.

8.15 London Affordable Rent will be subject to the usual regulation and rent setting guidance issued by the Social Housing Regulator. Nominations will be secured in the usual way, although there is a requirement to offer 5% of nomination rights to the GLA's pan-London Housing Moves scheme. This is considered acceptable and will be secured as such through the s106 legal agreement.

Intermediate Rent

8.16 Intermediate Rent is now the preferred intermediate tenure for the Council. This is established through the Intermediate Housing Strategy which targets a majority of rents within this tenure at people on incomes of £30,000-£40,000. For example an 'affordable' intermediate rent to a Camden resident earning £40,000 would be £215pw (inclusive of service charges). This calculation is based on an 'affordable' rent being no more than 40% of net household income being spent on rent (net being 70% of gross income).

8.17 The applicant is proposing intermediate rent for all of the intermediate units, which is welcomed. The proposed rent schedule for the 10 intermediate rent units is set out in the table below, alongside the income that would be required using the Council's measure of affordability;

Unit	Rent	Income Required
7 x 1 bed	£161	£30,000
4 x 2 bed	£215	£40,000

Table 4: Intermediate Rents

- 8.18 In light of the above table, the development would be providing an affordable product in line with the Councils Intermediate Housing Strategy. This rent proposal is therefore considered acceptable and is in accordance with the aims of H4 of the Local Plan and the Intermediate Housing Strategy.
- 8.19 It is important to note that in securing intermediate rent in perpetuity on this scheme, there is no provision for shared ownership. The Council has been consistent in raising concerns around the affordability of shared ownership in a high value area such as Camden, and this has been reflected in the publication of the Mayors Affordable Housing and Viability SPG, which promotes an alternative form of intermediate housing called London Living Rent. Whilst the Council welcomes the acknowledgment that shared ownership is no longer an affordable tenure in many parts of London (and especially in Camden), it does retain concerns around the London Living Rent tenure because it remains a sale product at the end of the rental period. This means that similar affordability issues may arise. As a result intermediate rent remains the preferred intermediate tenure in Camden, and its provision here is welcomed.

Viability and affordable housing

- 8.20 Policy H4 expects a contribution for affordable housing from all development that provide one or more additional homes and a total additional residential floorspace of 100sqm. A target of 50% affordable housing is sought to development with capacity of 25 or more additional dwelling, which is the target for this proposal with the aim of this provision being accommodated on site. Where a proposal does not meet the affordable housing target submission of a financial viability appraisal will be required to justify the lower proportion proposed.
- 8.21 It is also important to note that in August 2017 the Mayor published an SPG on affordable housing and viability. Within the SPG should a development achieve the provision of 35% affordable housing on site, based on habitable rooms, without public subsidy, it would not be required to provide a viability report to justify the provision. This is known as the 'Threshold Approach'.
- 8.22 The applicant has submitted a viability report (by Gerald Eve) to justify not providing 50% affordable housing on site, as required by policy H4. This report has been independently assessed by a viability expert (BPS) for the Council.
- 8.23 To establish the value of the land the applicant has used the Existing Use Value (EUV) plus a premium. This is the Council's preferred measures of land use, as noted in CPG. The applicant considers the EUV to be £105million, which includes a 12.13% landowner premium. Adopting such a percentage for the premium is in accordance with the Councils guidance. The figure is arrived at assuming Plot A is

refurbished and re-let, Plot B is re-let and Plot C continued on its existing lease. BPS consider this approach to acceptable.

- 8.24 Undertaking their own estimates, BPS arrive at an EUV figure of £116.15million which includes a 12% landowner premium. The difference is arrived at by the inclusion of the refurbishment of Plot B, higher rents estimated by BPS' consultants and the lower yield applied.
- 8.25 BPS consider that the valuations applied to the non-office element of the proposal are reasonable and based on good market evidence and are considered to be a suitable approach to establish the value of the proposed development. Furthermore BPS consider the valuations assumptions for the affordable housing are reasonable and in line with other schemes they have reviewed for the Council. In respect of the market housing the pricing is considered reasonable and supported by detailed comparable evidence.
- 8.26 In respect of building costs, following discussions between the applicant and BPS' consultants, they have now come to agreement on the build costs provided.
- 8.27 In light of their independent review BPS consider that the applicant's viability appraisal shows that 35.8% affordable housing based on floor area (21 units) is the maximum that can viably be delivered.

Deferred Affordable Housing Contribution

- 8.28 As outlined in CPG2, the Council will seek deferred affordable housing contributions where the provision of affordable housing falls short of the policy target of 50% due to financial viability and there is a prospect of viability improving prior to completion. The amount is capped at the shortfall between the amount of affordable housing proposed and the Council's policy targets. The affordable housing requirement for affordable housing is based on floorspace. The proposed affordable housing floorspace is 2710sqm, in 22 units. In this case a requirement of 50% of floorspace means that this is 1156.14sqm(GEA) short, leading to DAHC maximum payment cap of £3,063,771. This will be secured via Section 106 legal agreement.

9 AMENITY OF PROPOSED HOUSING

9.1 The considerations with regards to the amenity of the proposed housing are as follows:

- Policy review
- Design and layout
- Daylight, sunlight and aspect
- Noise and vibration
- Light
- External amenity space
- Conclusion

Policy review

9.2 London Plan policies 3.5 and 3.8 and Camden Local Plan policy H6 are relevant with regards to the amenity of proposed housing. Policy H6 notes that the Council will seek to secure high quality accessible homes in all developments that include housing, development is expected to meet the nationally described space standard

Design and layout

9.3 The proposed residential units have been designed to a high standard. The units have been set out to be ‘tenure blind’ in that there is no identifiable distinction between the private and affordable units. The social rented units have been designed to a high quality that meet the requirements set out in the development plan (including Council and London Plan standards).

9.4 New development should conform with the minimum space standards set out in Table 3.3 of the London Plan (see below) and Camden Planning Guidance 2 - Housing. Policy 3.8 of the London Plan further recognises that a genuine choice of homes should be provided in terms of both tenure and size and provision should also be made for affordable family housing, wheelchair accessible housing and ensuring all new housing is built to Building Regulations Part M.

Number of bedrooms	Number of bed spaces	Minimum GIA (m2)			Built-in storage (m2)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

Table 5: Minimum space standards for new dwellings

9.5 All of the proposed units meet Camden’s floorspace standards both in terms of overall size and bedroom size.

Daylight, sunlight and aspect

9.6 Within the applicant’s daylight and sunlight report they have assessed the daylight and sunlight levels that would be experienced by future occupiers of the development.

9.7 With regard to sunlight, the assessment has demonstrated that all of the proposed units would receive a sufficient level of sunlight.

9.8 In respect of daylight, the applicant has undertaken the ADF assessment which is more detailed and the results more informative. For the units located to the canal side one or two flats per floor would have living areas which would have an ADF value of below 1.5% with values ranging between 0.54% and 1.41%. It is likely this is due to the projecting balconies, room sizes and the glazed areas. Given the balconies provide important private amenity space and as the units are of a good standard in all other respects such as level of sunlight, size, outlook and privacy it is considered overall these units would provide a suitable standard of accommodation.

9.9 With regard to the units to the southwestern elevation, the northernmost flats would experience poor levels of daylight, these are the units adjacent to C1. To compensate for this units are provided with private amenity space in the form of terraces and would benefit from reasonable sunlight levels.

9.10 Given some units would experience a poor level of daylight, an assessment of this harm needs to be balanced against the wider planning benefits of the proposal. It is considered that when taking the benefits of the development, into consideration and given the fact each unit which fails the BRE daylight assessment would be of a generous size and have private amenity space, the overall low level of daylight to these units can be accepted. Officers have discussed amending the design to the units to the south west elevation of building C2, however it this wasn't considered a feasible option.

9.11 With regard to outlook and privacy, it is considered that units will be served by a sufficient number of windows to ensure future occupiers experience a good level of outlook. The units facing onto the canal will experience good views across the canal and will have a good separation distance from residents on the opposite side of the canal for there not to be an impact on future occupier's privacy.

9.12 Units located to the south western elevation will face onto the office accommodation within building C3 with a separation distance of between 10.3m to 17.8m. It is considered this is a sufficient distance for future occupiers to have an acceptable level of amenity in terms of outlook. It is also important to note that the outlook experienced by the units in the south western elevation adjacent to Building C1 was raised as a concern by officers, due to the proximity of the link bridge which previously was proposed at three storeys high adjacent to the residential units. Officers negotiated the reducing in the massing of this link bridge and its siting was moved away from the residential units to improve the outlook of these future occupiers.

9.13 In respect of privacy for these south western units, it is accepted that the units will not meet the 18m rule of thumb in terms of privacy as set out in the CPG (Amenity). However given the neighbouring building would be B1 accommodation with occupants present during normal working hours, it is of less of a concern than if the neighbouring building were residential. The CPG accepts that there may be

circumstances whereby a separation distance of 18m cannot be achieved, in these instances mitigation measures should be incorporated. It is therefore recommended that the glazing to the north easterly elevation of building C3 be obscure and a privacy screen is erected to the north east elevation of the terraces at levels 1 to 7. Such details shall be secured via condition.

Noise and vibration

- 9.14 In support of the application, the applicant has submitted a noise report, which includes information on the noise and vibration that would be experienced by future occupiers of the development.
- 9.15 The survey undertaken, notes that the east and south site boundary is currently exposed to high noise levels primarily due to traffic along St Pancras Way but also due to the proximity of the railway network serving King's Cross and St Pancras and distant construction noise. Noise levels on the western Site boundary adjoining the Regent Canal are significantly lower. On this basis it is logical that the residential units are located to the block adjacent to the canal as oppose to the St Pancras Way side of the site.
- 9.16 To mitigate against the current noise that is experienced on site, the applicant is proposed glazing which will reduce the noise experienced when within a unit. The glazing performance has been provided within the noise report. The proposed glazing performance is expected to achieve the Councils internal noise criteria, as presented in Table 2: Summary of Recommended Environmental Noise Levels of the noise report.
- 9.17 It is not possible to meet internal target levels in habitable rooms with windows open so internal noise levels in bedrooms and living rooms have been assessed with windows closed.
- 9.18 The noise report states that the ventilation strategy would consist of a mechanical ventilation system for the entire building. This would allow windows to remain closed for much of the time, with occupants and tenants free to open windows for purge ventilation and summer cooling as required.
- 9.19 Once the design has been finalised, detailed calculations in line with BS8233:2014 will be required to ensure that the façade sound insulation is adequate, such details will be secured via condition prior to the commencement of the development other than works of demolition.
- 9.20 It is therefore considered that subject to adequate mitigation measures, habitable rooms within the proposed development are likely comply with the proposed internal target noise levels.
- 9.21 With regard to the impact of the plant proposed on site to the future occupiers of the units, appropriate mitigation such as screening, enclosure and directivity will need to be secured via condition to ensure the nearest noise sensitive windows to the plant equipment will not be impacted by noise and vibration.

9.22 In regard to noise transmission between the non-habitable uses and the proposed residential units. Enhanced sound insulation between non-residential and residential uses of the development will be required. Mitigation measures shall demonstrate that the structure of the development will be sufficient to adequately contain the noise generated within the development.

External amenity space

9.23 With regard to private amenity space for the proposed units, all units with the exception of 3 private market studios would have private amenity space in the form of balconies/terraces.

9.24 The proposed terraces range from 6sqm to 11.16sqm. The draft London Plan requires a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings with an extra 1sqm should be provided for each additional occupant. The Camden Local Plan and CPG are not so prescriptive in respect of private amenity space, so using the draft London Plan is considered a reasonable approach. The larger terraces are associated with the 3 bed units and are a considered an acceptable size in relation to the units.

9.25 CPG (Amenity), states that 9sqm of open space should be provided per occupier. It is estimated that there would be 41 new residents as a result of this application and therefore 369sqm of open space would be required to accord with this guidance. As noted within the landscaping section, the development would be providing landscaped public realm and open space which would far exceed 369sqm with the central area providing 1246sqm. It is therefore considered sufficient open space would be provided to suit the needs of future occupiers of the site.

10 DESIGN AND CONSERVATION

10.1 The conservation considerations are follows:

- Statutory framework and implications
- Policy review
- Designations
- Design and conservation background
- Principle of Demolition
- Layout of proposed development
- Height, scale and massing
- Detailed design of each building
- Townscape Views
- Conclusion

Statutory Framework and Implications

10.2 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) is relevant. Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area.

10.3 The effect of this section of the Act is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas. Considerable importance and weight should be attached to their preservation. Should the Council define 'harm' it would only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the harm. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 12). This section of the report assesses the impact of the scheme on the heritage asset and . The balance of the harm and the benefits from the proposed scheme is discussed in the conclusion.

Policy review

10.4 NPPF section 12 paras. 126 to 137 in particular, NPPG section 18a, London Plan policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7, Camden Local Plan policies D1 and D2 and CPG1 (Design) are relevant with regards to design and conservation. The overarching aims of these policies are to secure high quality design that will preserve and where appropriate enhance heritage assets and their setting.

Designations

10.5 The site is located within the Regents Canal Conservation Area. It does not include any listed buildings nor are there any listed buildings within close proximity to the site. The existing buildings on site are noted within the Conservation Area Management Statement as making a negative contribution to the Conservation Area.

10.6 To the opposite side of Regent's Canal within the same Conservation Area is the Jubilee Waterside Centre, which is a portion of the former Midland Railway Hydraulic Pumping Station built around 1865. Adjacent to this is the retaining wall to the former Midland Railway Goods Yard. The wall was built in the mid 19 Century and is one of the few historic structures to survive in this section of the canal. Both of these elements are identified as making a positive contribution to the Conservation Area.

10.7 The site is bounded to the south by the King's Cross/St Pancras Conservation Area. To the south of the site is the St Pancras Hospital site which is a collection of buildings forming the St Pancras (University College) Hospital. This is the site of the former St Pancras Workhouse and is laid out in three sections. The northern most section which neighbours the application site is formed of three blocks. To the east is a 1930s two storey building which is identified as a positive contributor to the conservation area. The third block is a two storey prefab-style building which is identified as making a negative contribution to the conservation area by virtue of its design and materials.

Design and Conservation Background

10.8 Following concerns expressed by officers about the scale and form of the development in early iterations of the scheme and comments from the DRP, the scheme has been fundamentally revised to open up access to the canal, both visually and physically and to improve site connectivity and permeability. These revisions are noted in paragraph 4.3 above. Officers have worked closely with the applicants to revise the scheme in light of earlier concerns focused on the height,

bulk and overbearing character of the proposed development of the UBB site. The scheme has been revised and refined during the course of the application and through the design workshops held collaboratively.

- 10.9 In assessing the proposal, one of the main focuses has been on the impact of the proposal to the Regents Canal Conservation Area, which the site is located within and the Kings Cross/St Pancras Conservation Area which neighbours the site.
- 10.10 The Regent's Canal itself forms part of the Grand Union Canal. Along the Camden section of the canal is a concentration of industrial archaeology with its associated railway features. The Regents Canal Conservation Area Appraisal and Management Strategy(RCCAAMS), notes that the Council's intention is to conserve and enhance the existing character of the canal and to improve its potential for recreation, transportation and wildlife.
- 10.11 The main-line railways radically changed the lie of the land with their extensive goods yards, built close to the canal for interchange purposes amongst other reasons. They were raised on embankments with retaining walls hard against the towpath side of the canal, as can be seen on the canal side opposite the application site.
- 10.12 Many of the industrial buildings and structures are fine examples of industrial brickwork, illustrating styles of engineering construction characteristic of the 19th and early 20th centuries and using various types of brick, some produced in London and others brought in by the railways from their respective regions. Cast iron and wrought iron are also well represented.
- 10.13 The RCCAAMS, notes that the existing buildings on site have a particularly poor relationship with the canal. Further it notes that a negative feature of this stretch of the canal is the lack of access which detract from the appearance of the area and to some extent discourage use of the canal.
- 10.14 The RCCAAMS prescriptions relating to new development are as follows;
- 'The conservation area is varied in scale and new design should respect the scale of the particular location. Appropriate design for the conservation area should complement the appearance, character and setting of the existing buildings and structures, the canal, and the environment as a whole. The enclosure or openness of particular sections of the canal should be respected as this quality contributes significantly to its varying character. Building heights should not interfere with views to local landmarks. Developments should respect and where possible enhance central London panoramas and other views from within and outside the conservation area' (p.37).
- 10.15 As with the Regent's Canal Conservation Area, the neighbouring King's Cross/St Pancras Conservation Areas is characterised some industrial buildings given the history of the area. More recently the area has seen the King's Cross Central redevelopment shaping the character of the area. Adjacent to the application site is the St Pancras Hospital site as noted above, which includes positive and negative contributors to the conservation area. This neighbouring site

is identified within the Council's Site Allocations Plan as a potential development opportunity, it is highly likely this site will come forward for redevelopment in the near future.

Principle of Demolition

10.16 With regard to demolition of the existing building on site, no objection is raised to the demolition of the existing building on site which is considered to negatively impact on the Regent's Canal Conservation Area.

10.17 When buildings are to be demolished within a Conservation Area, it would be standard practice to use a condition to ensure that no demolition happens until a contract for the construction works is in place. This ensures sites are not left empty which could impact on the character and appearance of the Conservation Area. The phasing plan, to be secured via Section 106 Agreement will provide details of the timings of the development and it is considered it is important it also secures details of how the buildings that will not be demolished immediately will appear when part of the existing building has been removed. This would include details of the northern elevations of Plots B and C which will reveal themselves following demolition of Plot A and B respectively.

Layout of the proposed development

10.18 The site is divided into 3 plots; A, B and C. Plots A and B comprise of a single building and plot C is formed of 4 buildings.

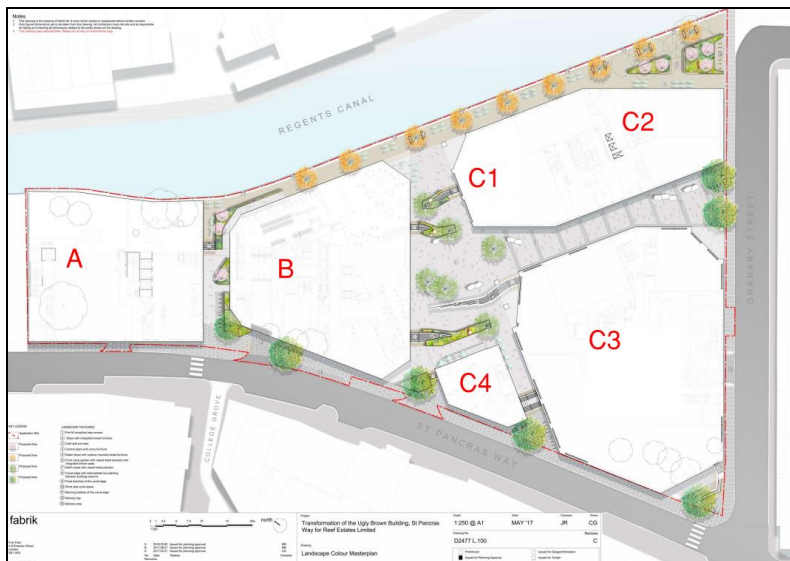


Figure 4: Layout of proposed development

10.19 As the development fronts the canal, the ground floors of buildings B and C1 have been cut away to increase the visibility of the canal at street level. These buildings are set back 6m from the canal edge, providing a route along the canal which currently doesn't exist. Building C2 has been angled back from the canal on alignment with Granary Street to form an area of public space adjacent to the canal. This set back also increases views south when looking from the north.

- 10.20 The central public space between plots B and C provides a focal point within the scheme. The wider opening to St. Pancras Way allows sunlight into this space, particularly during the lunch time period when it is most likely to be occupied by users of the workspace on the site. At the entrance to the space from St Pancras Way a 3 storey pavilion building provides enclosure to the space and a degree of protection from the traffic along St Pancras Way. Entrances to buildings B, C1 and C3 and the outdoor terrace area of C4 will ensure that the space will be activated through the uses of these buildings. The space is conceived as a series of terraces traversed by steps and a ramp to facilitate the change in level between St Pancras Way and the canal towpath of circa 2m.
- 10.21 The development would provide a new route from Granary Street between buildings C1 and 2 and C3. This will lead into the central space and through to St Pancras Way and onto the north towards Camden Town such a route would aid in activating the site.
- 10.22 It is noted that the GLA and TfL have raised concern about building A coming right up to the canal edge as they consider it would fail to futureproof the site for a potential towpath along the western edge of the canal. However officers feel that there is limited opportunity for a towpath on this side of the canal heading north given the age and status of existing buildings and how these already address the canal. For example directly to the north at Nos.8-14 is a development granted permission in 2004 for redevelopment to residential and office, which has since been completed and is occupied. At this site there is an area to the canal side of the building which appears as a private deck and measures between 1.2-2.25m in width which would make for a viable towpath. Beyond this at No.16 St Pancras Way permission was granted in 2005 for the redevelopment of the site for B8 and residential accommodation. This development has also been constructed and occupied. There is an area to the front of this building which measures between 1.5-4.9m however this is directly adjacent to residential windows and officers would question if it would be appropriate to have a public towpath running so close to existing occupiers bedrooms and living rooms. Given the limited width at this point it would be unviable to have a towpath and some defensible space for the existing occupiers. Moving further north at Nos.18-20 is another residential development constructed within the last 20 years, there is a larger area to the canal side of this building, however this is fenced off and appears to be used as amenity space by residents. At Nos.22 and 24 also known as Somerston House there is a break in these two buildings which provides a small car park which is at a lower ground floor level and there is not direct access to the canal. The last two buildings before Grays Inn Bridge are both residential buildings which come up to the canal edge with private amenity space adjacent to the canal.
- 10.23 Due to the nature of the neighbouring sites to the north in terms of age, use and siting of existing buildings, it is unlikely that there would be opportunity for a towpath on this side of the canal. It would rely on multiple land owners bringing their sites forward for redevelopment within the foreseeable future and this isn't something the Council can give a lot of weight to at this time, given there is no indication that these neighbouring sites would be coming forward. On that basis it is considered that in allowing building A to build up the edge of the Canal it is not prejudicing permeability around the locality and the development in itself would be

providing routes through for both pedestrians and cyclists, as discussed in detail within the transport section.

Height, Scale and Massing

- 10.24 During the pre application process and the course of this application the height scale and massing of the proposals has been progressively reduced and refined in response to officer's comments and local consultation. In summary the height, scale and massing has been reduced from initial proposals ranging between 19,13,8 and 5 storeys to the currently proposed 11,10,8 and 7 storey heights.
- 10.25 The proposed height, scale and massing has been conceived in the context of the height and scale of 103 (completed),102 (under construction) and the consented 101 Camley St which range between 5,8,10 and 12 storeys and also The Travis Perkins/ Unite student building on the opposite side of St Pancras Way which ranges between 8 and 11 storeys.
- 10.26 The annotated long elevation below demonstrates the correspondence of the proposals with the height and scale of 101 Camley St, 103 Camley St (dotted line) and the Travis Perkins/Unite student building visible between and beyond C1 and the Ted baker building. It also shows the transition between the 5 storey frontage of Building A and the 5 and 6 storey buildings further along St Pancras Way.

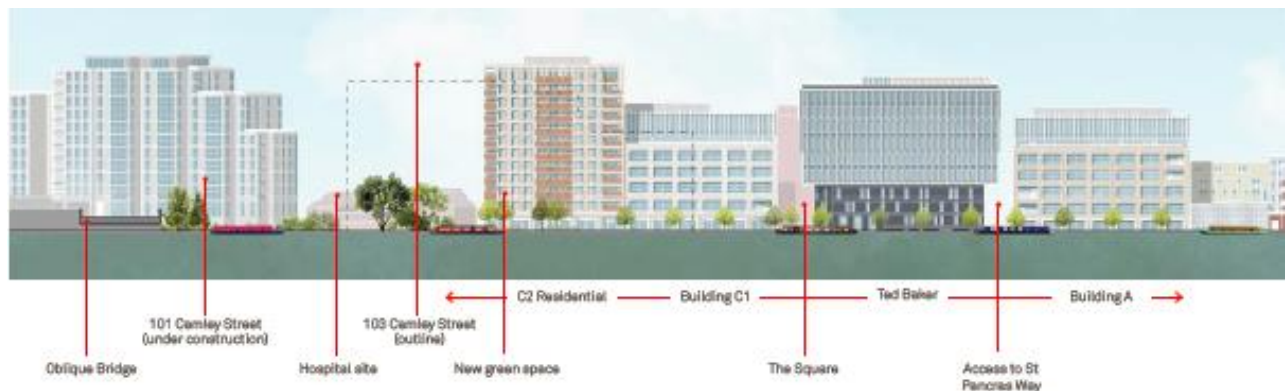


Figure 5: Proposed development in view along canal

- 10.27 Further refinements have also been sought to reduce the impact of the perceived scale and massing along the canal. As stated above, the residential block C2 has been angled back from the canal on an alignment with Granary St. This aids in breaking up the building mass along the canal frontage in long views from the towpath looking southwards and will open up a view to the sky and greenspace between C2 and 101 Camley Street when built.
- 10.28 During the course of the application Building A has been revised from a 6 storey building with a single storey set back to a building which would be 5 storeys with a 2 storey set back. Building C1 has had the top two floors set further back. In revising the building lines for both buildings the result is a reduced perceived mass along the canal frontage, which officers consider is an improvement on the original proposal. Officers consider that the development would respond well to the canal and surrounding context and support the current proposals.

10.29 The elevational treatment of A, C1, C2 and C3 has been revised to provide a single storey expression to the ground floor, as opposed to the initially proposed double height expression predominance across the site. This has the effect of reducing the apparent scale of the buildings by providing a horizontal emphasis and providing a stronger correspondence to the site's immediate context. This change also provides an architectural expression more responsive to the historic character of the canal.

Detailed design of each building

Building A

- 10.30 The proposed building would be 7 storeys in total, 5 full storeys with a 2 storey set back to minimise the mass of the building along the canal.
- 10.31 The main body of the building shares a similar architectural language with the other office buildings C1 and C2. The building would be located on the canal edge, when original submitted the building had a colonnade to the front which terminated at the end of the site and would not have lead any further up the canal. During the course of the application this was amended to bring the building line right up to the canal edge, this design is in keeping of the manner of former warehouses on the site and therefore part of the character of the area.
- 10.32 The form of the building as it addresses the canal follows the curve of the canal creating a undulating form. The building facades are predominantly brick with wide and deep window openings and metal window frames. The window openings have pre cast concrete lintels providing contrast to the horizontal bands of soldier course brickwork between the openings. These details are resonant of the historic detailing of workspace and warehouse buildings in the borough and throughout London. The base (ground floor) of the building is defined by its construction in pre cast concrete. The two rooftop levels comprising a glazed facades behind pre cast concrete vertical fins these are set back 6.7m from the levels below. There would also be a plant enclosure to the roof, set back 12m from the main façade of the building.
- 10.33 As the latest DRP, the panel noted that the north elevation of Building A would benefit from further thought to reduce the extent of blank facades to ensure it contributes positively to the Conservation Area. However, officers consider that no further changes to the north facing flank are required in order not to prejudice future development on the adjacent site. The panel also noted that the ground floor appeared too low and constrained and lacks a sense of generosity. However the formation of a double height base would be a retrograde step as this approach has already been tried and officers consider that the single storey expression is more resonant of the character and appearance of the conservation area.
- 10.34 The overall effect of the proposed detailing is to create an appearance relating to a contemporary warehouse. Which is considered to appropriately address the canal and respect the character of the surrounding area.

Building B

- 10.35 Building B will accommodate the headquarters of Ted Baker at levels 03 to 09, together with a boutique hotel on ground, first and second floors. This building takes a different form, materiality and detailing in comparison to the other proposed buildings. In treating the building in this manner it subtly highlights the operation of the building as the Ted Baker headquarters'. The base of the building, constructed in dark brick with a light mortar accommodates the hotel. The detailing of the base in the form of projecting brick bands between the floors and asymmetrically arranged deep punched windows provides articulation and visual interest across the surface of the brick work.
- 10.36 The latest DRP report questioned the dark brick base of the building, however officers consider this material provides continuity with the use of brick across the site and also the role of this material in its contribution to the character and appearance of the conservation area. In any event, this will be the subject of a condition requiring precise approval beforehand.
- 10.37 Above the dark brick base the upper 6 levels are predominantly glazed within a two storey frame of external vertical perforated metal fins repeated across the six storeys. These fins provide shade and articulation of the building surface. A further layer of articulation is provided by the increasing the depth of the fins of each two storey section from 200mm within the lower two storeys, through 400mm to 600mm on the top section which adds to the visual interest of the building.
- 10.38 Within the latest DRP, it was noted that the panel found much to admire in the way the architecture of the scheme has developed, particularly the distinctive Ted Baker building. The panel did note that there could be scope for the architecture of the Ted Building to have a more playful feel announcing it from the remaining buildings on site. However officers consider that the use of metal fins to the upper levels of Building B, add a character which isn't found on the other buildings on site and ensure Building B appears distinct from the other buildings on site whilst linking into the historic character given the use of metal and a dark brick.

Building C1

- 10.39 This building would take the same form and detailed design as building A and a similar detailed design of C3 with a precast concrete base, a brick middle section with wide and deep window openings, metal window frames and pre cast concrete lintels and a top formed by a set- back double storey roof pavilion. Using subtle differences to the architectural form of the buildings results in a family of buildings which tie the site together whilst reflecting their intended use and picking up notes from the historical uses in the area.

Building C2

- 10.40 Adjoining C1 also facing the canal is the residential block of C2, constructed in a mid-tone brown brick. Each floor is defined by a horizontal pre cast concrete band. Articulation of the surface is provided by angled brick panels adjacent to the window openings, which aid in softening the reveal and provide variation in light and

shadow across the surfaces of the façade. The building has a distinct architectural style which is reflective of its residential use.

10.41 The canal side of the building has been amended during the course of the application to set the building line back. This allows for an area of public space adjacent to the canal and also opens up view to the south along Granary Street. The canal side elevation is further animated by projecting orange brown metal balconies. On the southern elevation there are no balconies, creating a contrasting composition to the elevational treatment. On the south western elevation balconies are inset.

10.42 In response to the final DRP comments the north facing flank elevation has had additional window openings added to the top three floors. Furthermore the top two stories of the building have been opened up beneath the double height cut away. These changes have the effect of providing more visual interest on this flank in views southwards along the canal.

Building C3

10.43 Set to the south western corner of the site is Building C3. This building would have a composition similar to A and C1 marking the workspace buildings, other than the Ted Baker headquarters, as a common grouping to provide a degree of homogeneity on the site. Differences are marked within this grouping by changes to the elevational treatment generated by the particular disposition of the building and differences in brick tone. In the case of C3 a light tone is proposed similar to C1 whereas A is proposed as a mid brown tone.

10.44 The roof top pavilion to C3 follows a similar design aesthetic to A and C1 with pre cast concrete vertical fins wrapping around a glazed floors. In this case, this approach is deployed across 3 storeys rather than 2 storeys on A and C1.

Pavilion

10.45 The detailing to the pavilion follows that to the base of block B in terms of brick colour and articulation of the surface. Architecturally it is conceived as an out cropping of the building B which provides a continuity of enclosure and added coherence to the central space and links to Building B.

Townscape Views

10.46 The applicant has provided a 13 different Townscape Views, from both short and long range views to demonstrate the impact of the proposed development on the wider area.

10.47 With regard to long range views, it is important to note the south east corner of the site is located within the London View Management Frameworks(LVMF) Wider Setting Consultation of the Parliament Hill to St Paul's London Panoramas from assessment point 2A.1. It is not located within the Protected vista itself, as shown in Figure 6 below.

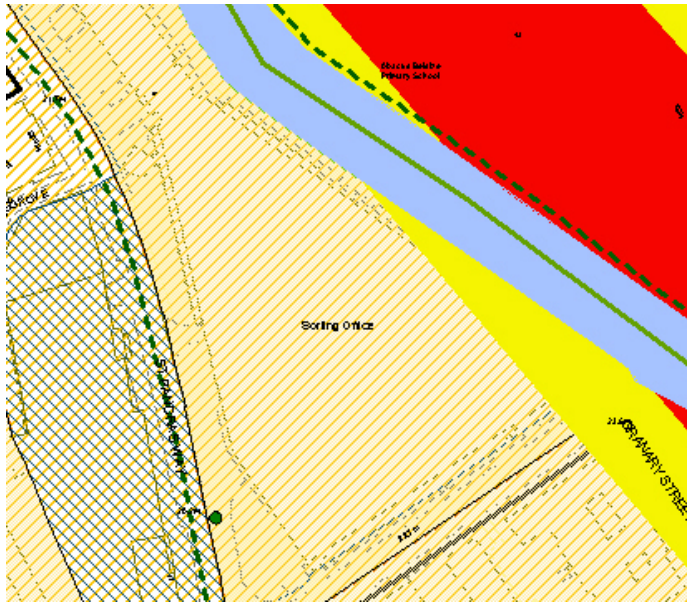


Figure 6: Site in context of view 2A.1 of LVMF

10.48 Although part of the site is within the Wider Setting Consultation Area, it would not rise above the Threshold Plane as set by the LVMF and its impact on the view is considered to be minor. The two images below demonstrate the existing view and a proposed view with the development outlined in red and yellow. As is demonstrated in the images below the view to St Paul's would remain largely unaltered and the impact would be minor.



Figure 7 : Existing view from Parliament Hill



Figure 8: Proposed view from Parliament Hill

10.49 In respect of views north and south along the canal, given the scale of the development it would contribute towards increasing built development along the canal and would impact on the levels of light onto the canal. When looking north in short range views from the opposite side of the canal, the development has sought to incorporate the proposed, much larger buildings into the wider context by introducing a variety of heights, varying the elevational treatment and setting the blocks at angles reflecting the curves of the canal. This has helped to break up the scale and mass of the development. The trees, soft landscaping and moorings in the foreground help maintain the gentle, calm and green character of this part of the Conservation Area.

10.50 In respect of the view from the junction of Plender Street and College Place, please see figure 9 below, the development will form a substantial, clearly discernible backdrop to the listed Grade II terrace. This is a terrace of nine houses. Nos. 14-22: late C18, probably built by Joseph Kirkman and Alexander Hendy as part of the development of Lord Camden's Estate. No. 8 Royal College Street which stands facing down Plender Street, has in particular, a distinctive and characterful brick gable decorative parapet. The proposed development will reduce the visibility of the listed buildings by appearing over and above the roofline. However, from this view it is not considered to cause harm to these heritage assets.



Figure 9: Existing and proposed view from Plender Street Junction with College Place

- 10.51 With regard to views from the south along the canal with within the Kings Cross Central development, the context of the recent taller developments, including those not yet built on Camley Street, is clearly of rail infrastructure and a more densely developed townscape.
- 10.52 Views have been demonstrated from both the local area and longer range views from St Pancras Station, within St Pancras Old Church, Camden High Street along Pender Street, the junction of Pancras Road and St Pancras Way and outside No.22 St Pancras Way. It is considered that these views will not be impacted by the proposals.
- 10.53 In conclusion, it is considered the proposals would be an improvement on the existing buildings which make a negative contribution to the Conservation Area. The scale of the development is considered to respect the scale of the immediate and emerging townscape formed by 101,102 and 103 Camley St and the Travis Perkins/Unite students building on the opposite side of St Pancras Way. By virtue of their materiality, detailing and colour tones the proposed buildings are considered to be complementary to the character and appearance of the conservation area.
- 10.54 The detailed design of buildings A and C1 relate to the historic form of warehouse building which would have fronted the canal. The buildings are considered to be of a high quality with good detailing to ensure they have taken appropriate references from the historic character of the buildings.
- 10.55 The proposals would open up the canal and the site, providing public access along the canal which doesn't current exist together with increased permeability through the site and improvements to the public realm both in and surrounding the site. Improving access to the canal is one of the aspirations of the RCCAAMS which the site would address. At the same time the development would preserve the calm character of the canal by virtue of how the ground floor uses would operate as discussed in the land use section above.
- 10.56 With regard to townscape views and impact on the Conservation Area, it is considered that the proposals would not interfere with views to local landmarks or panoramic views of central London nor would they cause significant harm to other views from within and outside the Conservation Area. Therefore the proposed development is considered to be in alignment with the principles for new development in the Conservation Area and would preserve and enhance the character and appearance of the Conservation Area, in accordance with policies D1 and D2.

11 LANDSCAPING

Landscaping

- 11.1 There is very little in the way of landscaping on the existing site with the exception of areas of planting to the St Pancras way and the north and south ends and a collection of trees to the south eastern side adjacent to the canal.

- 11.2 The layout of the proposals provides routes through the site which currently weren't available. The landscaping has been design to respond to the layout of the development, the topography of the site and the characteristics of the site and the local context.
- 11.3 The hard landscaping is considered to be of high quality and suitable for the site. The proposed layout of steps, beds and benches and the interaction between them is varied and informal in nature, adding character to the open space at the centre of the site.
- 11.4 Soft landscaping are proposed in the form of planters located around the site together with new tree planting which is discussed below. The applicant has provided an indicative planning palette with the application. Full details will be secured via condition to secure the right planting for the locality that will be delivered in a phased manner.

Playspace

- 11.5 With regard to playspace, it is anticipated that the child yield for the development would be 20 children. The London Plan expects such a child yield to provide 199sqm of play space. This breaks down to 81sqm for 0-5 year olds, 71sqm for 5-11 year olds and 47sqm for over 12s. The applicant has noted within their landscaping strategy that the site is not suitable for play equipment for older children and therefore they are proposing to over provide for 0-5 year olds. The applicant has identified opportunities for the provision of 5-11 and 12+ to play off-site in the surrounding area, based on the GLA maximum walking distances to play areas for different children.
- 11.6 In light of this the applicant is proposing sculptural furniture and elements which will encourage a sense of explorations, discovery and imaginative play. It has also been proposed that the large areas of hard standing can be used by children for ride-on toys and allow children to move freely around the plaza area. In addition some areas of steps will have integrated furniture elements and sensory soft landscaping.
- 11.7 It is accepted that the development may not be suitable for play equipment for older children given the predominant presence of office accommodation and the lack of large areas of soft landscaping. Whilst the proposed provision is a starting point to address a provision of 0-5 year olds, officers consider it necessary to secure further details via condition on the specific play equipment that will be provided to ensure the site maximises the most appropriate provision for 0-5 year olds.
- 11.8 Full details of the landscaping works will be secured via condition this will cover all areas of hard and soft landscaping securing details of planting and materials.
- 11.9 The supporting text within Policy A2, notes that an important consideration will be the long-term ability for a space, including landscaping, planting, street furniture and surfaces, to be managed effectively and with demands minimised on natural resources. It is therefore recommended that an Open Space Management Plan is secured via a Section 106 legal agreement.

Trees

11.10 There are currently 30 trees on the site. The arboricultural report submitted with the application contains a tree survey in line with BS5837:2012 – “Trees in relation to design, demolition and construction” which has categorised all trees included within the application site as follows:

Tree grade	BS5837:2012 definition	No. of trees
A	High quality, est. remaining life span of >40 yrs	1
B	Moderate quality, est. remaining life span of >20 yrs	11
C	Low quality, est. remaining life span of >10 yrs or below 150mm diameter	17
U	Poor quality, est. remaining life span of <10 yrs	1
	TOTAL	30

Table 6: Existing trees on site

11.11 All 30 of these trees would be removed under the proposals. The removal of the category A silver maple from the St Pancras Way frontage and the group (10 trees) of category B variegated sycamores from the canal frontage is considered to cause some impact to the character of this part of the conservation area.

11.12 27 replacement trees are proposed to be planted to mitigate the loss of visual amenity and canopy cover provided by the existing tree stock. While this will result in a net loss of trees on site, the majority of the existing trees are of low quality. Many of the existing trees are planted in such close proximity to each other that their safe useful life expectancy is reduced and their ultimate form will be compromised as a result.

11.13 The proposed replacement trees have been grouped into 4 categories and species have been selected in a bid to suit their location in term of ultimate size and form: canal frontage, street frontage, plaza, canal garden/north street. The proposed plaza species, Gleditsia tricanthos is not considered to be a sustainable choice due to the heavy shade the trees would be subject to and the poor performance of this species elsewhere in the borough. Camden’s tree section no longer plant this tree due to historic poor success rates. It is therefore considered necessary to secure details of all new trees prior to the commencement of landscaping works.

11.14 In terms of location, the proposed replacements are spread far more evenly across the site. This includes rows of trees along the canal edge and St Pancras Way together with trees to mark the entrance point at Granary Street and within the central plaza. This, in combination with the extensive shrub and herbaceous planting proposed and the high quality diverse green and brown roofs are considered on balance to be an improvement and to enhance the biodiversity of

the site and the character of this part of the Conservation Area. Together with a condition on landscaping, details of the green and brown roofs will be secured.

- 11.15 Sectional drawings show tree pits that contain root cells, but the volume of the tree pits appear far smaller than what could be achieved, particularly on the canal frontage. The proposed trees of the largest ultimate size, the London plane trees on the St Pancras Way frontage are considered to be too close to the proposed building to allow for long-term growth. Both of these issues can be address through the addition of a landscaping condition should the scheme be recommended for approval.

Conclusion: Landscaping

- 11.16 The loss of the category A tree and category B group of trees is regrettable. However, their loss is considered unavoidable, for the delivery of the development which will enable the canal to be opened up and allow for public access through the site. Officers consider the replacement tree offer to be better than the existing and the proposed hard landscaping and planting will be of a high quality which will ensure it is well used and sustainable. Given the above, on balance the loss of a Category A tree is considered acceptable due to the overall improvements the development will bring, the proposals are considered acceptable in terms of trees and landscaping.

12 NATURE CONSERVATION AND BIODIVERSITY

- 12.1 Policy A3 of the Camden Local Plan, seeks to ensure Camden's growth is accompanied by a significant enhancement in the borough's biodiversity. It is noted specifically that the Council will protect and enhance sites of nature conservation and secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor. The canal located adjacent to the site is a designated green corridor and Site of Metropolitan Importance for Nature Conservation.
- 12.2 An ecological assessment has been submitted as part of the application, including a Phase 1 Habitat Survey. The Survey notes that the site is dominated by buildings and hardstanding which support negligible vegetation. The loss of the buildings, hardstandings and soft landscaping would be of no ecological importance. In terms of protected species, the survey notes that the site offers extremely limited opportunities for faunal species. There is some very minor potential for common nesting birds to utilise habitats present. The applicant is proposing appropriate measures to safeguard faunal species, including nesting birds during site clearance works. It is noted within the report that mitigation measures during construction would be incorporated into the Construction Management Plan which would be secured via Section 106 legal agreement. Such measures will include provision and maintenance of protective fencing at the site boundary with the canal, storage of chemicals and other materials away from the canal boundary, lighting to be designed sensitively to minimise light spill into the canal and temporary bunding and run-off to be in put in place to prevent run-off into the canal corridor. These measures have been reviewed by the Council's Nature Conservation Officer who considers them appropriate.

- 12.3 With regard to enhancements, the proposed development presents an opportunity to secure a number of ecological enhancement measures at the site, particularly relating to the interface with the adjacent canal. The applicant is proposing a range of new planting and biodiverse roofs with effective management to ensure these benefit the wildlife in the long term. It is also proposed to install a number of bird and bat boxes across the development.
- 12.4 The installation of bird and bat boxes is welcomed, these will need to be located away from disturbance, integrated into the building and situated high on the building. The applicant has annotated on the roof plan the location of the proposed boxes but no further detail has been provided. It is therefore recommended that details of the boxes should be secured via condition prior to the commencement of the relevant building, to ensure the boxes will be well integrated into the buildings.
- 12.5 The proposal includes biodiverse roofs across the development, this is welcomed to contribute to biodiversity. It is recommended that full details of the biodiverse roofs are secured via condition prior to the commencement of the relevant building.
- 12.6 The survey has been reviewed by the Council's Nature Conservation officer who has confirmed that the ecological impact has been adequately assessed. However it was considered that more could be done to support the ecological function of the canal corridor which would include maximising opportunities for greening to provide wildlife habitat along the canal side.
- 12.7 The development is proposing 276sqm of natural green space. Some biodiversity value will be provided through the 276sqm, however it is considered necessary to ensure the applicant investigates further methods of incorporating ways to enhance biodiversity value on the site. This could include deadwood from felled trees re-used on site within a soft landscaping scheme to provide value wildlife habitat. To ensure the development is bringing forward the maximum and most appropriate measures to enhance biodiversity a soft landscaping plan is to be secured via condition.
- 12.8 Even with an enhanced soft landscaping approach, the development would not deliver the requirement for Natural Green space provision. To compensate for this impact, it is considered necessary to seek a contribution towards ecological enhancements on the canal and locality. Officers have been in discussion with The London Wildlife Trust who are working on a project to desilt the pond in Camley Street Nature Reserve and re-use the silt to create floating habitat beds in the canal to enhance biodiversity along the canal. Unfortunately the funding for this project has been withdrawn. This is considered an opportunity to secure the funding for the project to enhance biodiversity along the canal to mitigate the shortfall of provision on site. The project would require £46,000 which would be secured via the Section 106 legal agreement.

13 IMPACT ON NEIGHBOUR AMENITY

- 13.1 The considerations on the impact on the amenity of the occupiers of neighbouring properties are as follows:

- Policy review
- Daylight and sunlight
- Outlook
- Overlooking
- Noise and disturbance

Policy review

13.2 Policy A1 of the Camden Local Plan 2017 requires development to consider the impact on daylight and sunlight levels experienced by the occupants of surrounding residential properties during the design and layout of proposals. It refers to the more specific Camden Planning Guidance 6 on Amenity (CPG6) for further guidance. CPG6 aims to minimise the impact on the loss of daylight and sunlight. Whilst it references the Building Research Establishment's Site layout planning for daylight and sunlight: A guide to good practice ('BRE Guidance') for guidelines and methods, it also acknowledges the need for a flexible approach and suggests the use of appropriate alternative targets to address special circumstances of a site.

13.3 The London Plan refers to the Housing SPG (2016) for guidance on assessing daylight and sunlight levels which in turn names the BRE guidance as the key document of reference. Like CPG6, the Housing SPG states that 'an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances, the need to optimise housing capacity, and scope for the character and form of an area to change over time'. To fully optimise housing potential on large sites, the Housing SPG infers that it may be necessary to depart from standards presently experienced but cautions that unacceptable levels of harm should be avoided.

13.4 At a national level, the draft NPPF (March 2018) advises that when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.

Daylight and sunlight

13.5 A Daylight, Sunlight and Overshadowing Report has been submitted as part of this application which details any impact upon neighbouring residential properties and open spaces. The applicant's daylight and sunlight assessment considers the proposed development's relationship to immediate neighbours as well as properties further afield against the methodologies supported by BRE Guidance. In addition, the applicant has submitted a 'mirror massing' justification for 11-23 Pancras Way, which can be a valuable methodology for development sites with a relatively low height compared to the prevailing urban massing in the area. The approach is supported by BRE Guidelines which states that where a building has "windows that are unusually close to the site boundary and taking more than their fair share of light" – alternative target criteria can be set by mirroring the massing of the property across the boundary.

13.6 Given the scale of development, officers have considered it necessary to have the submitted Daylight and Sunlight report, independently reviewed. Comments of this review are provided within the assessment below.

Study Area

13.7 For daylight and sunlight, the study area of the BRE assessment was defined by the extent of the residential properties which have windows facing the application site and that were considered to be close enough to the application site to be affected by the proposed development.

13.8 The impact to the daylight and sunlight to the following surrounding properties and consented developments has been analysed, taking into account the extent of the proposed development massing and their proximity to the site. Those addresses in bold are entirely or partly in residential use:

- **19 Ploughman's Close**
- **4-13 Reapers Close**
- **16-22 (Even) Crofters Way**
- 105 Camley Street (Jubilee Waterside Centre)
- **101 Camley Street**
- **103 Camley Street**
- St Pancras Hospital
- **11-23 (Odd) St Pancras Way**
- **8-16 (Even) St Pancras Way**

13.9 The figure below annotated the location of the neighbouring properties. Please note this is the massing of the existing building.

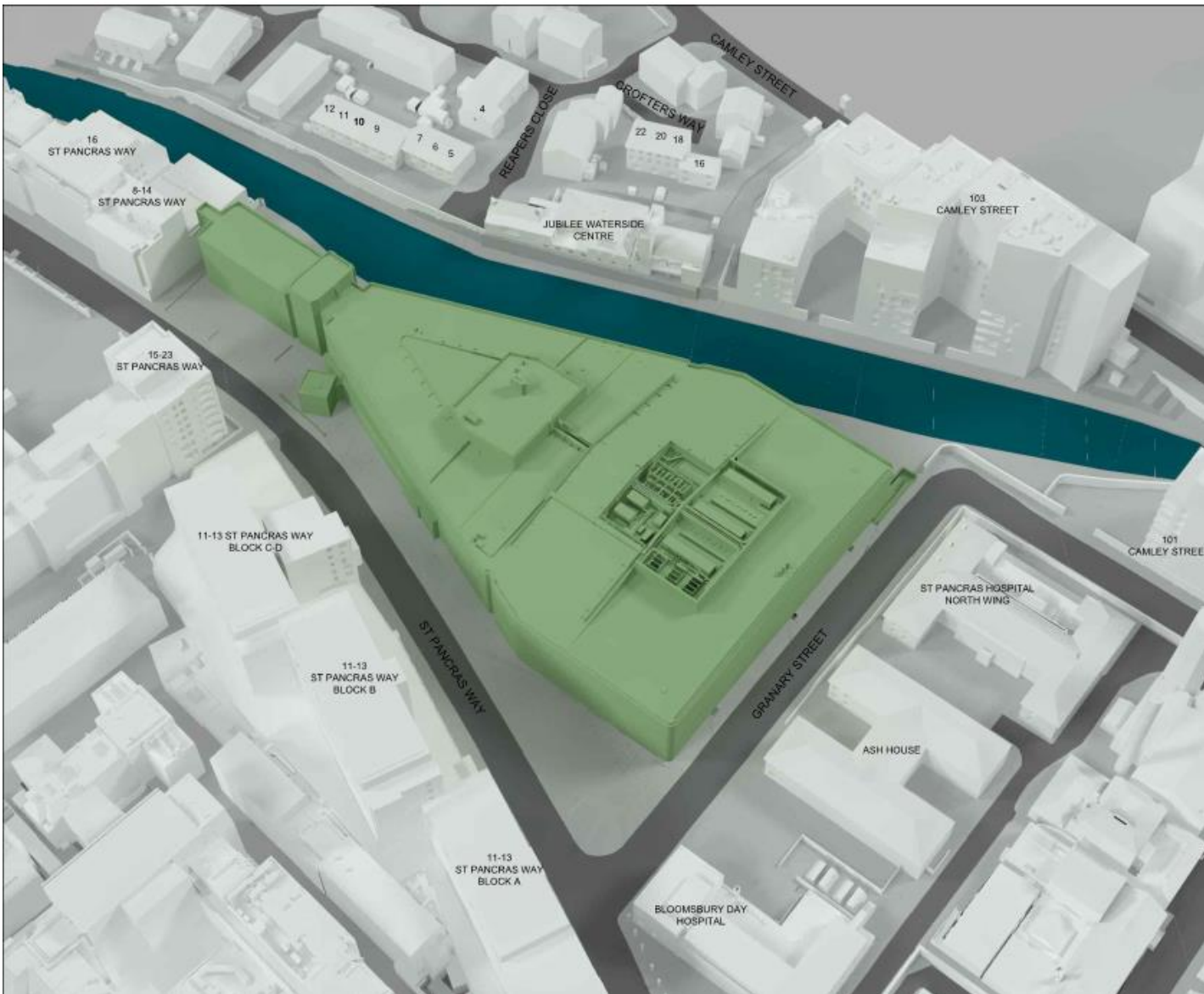


Figure 10: Annotating surrounding addresses that were assessed

13.10 While non-residential properties would not usually be of primary consideration for daylight and sunlight, the BRE Guidelines state that non-domestic buildings “*where occupants have a reasonable expectation of daylight*”, including “*schools, hospitals, hotels and hostels, small workshops and some offices*” may also need to be taken into account for daylight and sunlight. The assessment therefore extends to the Jubilee Waterside Centre which is currently occupied by the Abacus Belsize Primary School, and St Pancras Hospital. For clarity, the student accommodation at 11-23 Pancras Way has been considered as residential for the purpose of the assessment.

Independent Review

13.11 The Council appointed an independent assessor, Delva Patman Redler (DPR) to review the submitted material and advise on the suitability of the methods of assessment, the criteria used for the study and the conclusions derived from those criteria, and the results obtained. The conclusions of the independent review are set out in detail below.

13.12 With regard to the impact on neighbouring properties, DPR's report states that it does not agree with all of the alternative targets put forward in the report or how the mirror-massing guidelines were interpreted in deriving one of those targets. However it acknowledges the need to apply the guidelines flexibly and have regard to the urban context and given the use of the rooms affected DPR agree with the conclusion that the impact, whilst noticeable, could nonetheless be considered acceptable.

Daylight: Methodology

13.13 The technical analyses have been informed by a digital 3D model of the existing and proposed site conditions, based on measured survey data. The following methodologies were used in the assessment of the existing versus proposed daylight levels:

- Vertical Sky Component (VSC) - A measure of the amount of sky visible at the centre of a window.
- No Sky Line (NSL) - The area at desk level inside a room that will have a direct view of the sky

13.14 VSC is generally considered the most appropriate way of measuring daylight to existing neighbouring properties and will be the primary methodology referred to in the assessment of impact. BRE guidance considers that daylight may be adversely affected if, after development the VSC is both less than 27% and less than 0.8 times its former value. VSC has its limitations; however, in that it does not account for the size of the window, any reflected light off external objects or from within the room, or the use of the room. Kitchens, living areas and bedrooms are considered more sensitive than non-habitable rooms such as hallways, bathrooms and studies.

13.15 Whilst BRE guidance considers a retained VSC score of less than 27% to be below optimal levels of daylight, it is important to acknowledge that this target value is derived from a low density suburban housing model rather than a higher density urban scenario which is more applicable to the proposal. As set out above, regional and local policy calls for a flexible approach to analysis, particularly on large, well-connected sites, whilst independent critiques of BRE guidance infer that values in excess of 20% should still be considered reasonably good and retained VSC in the mid-teens should be acceptable for an urban context.

13.16 For the purpose of interpreting retained VSC levels, paragraph 2.1.21 of the BRE guidance states that if VSC is:

- at least 27% - conventional window design will usually give reasonable results.
- between 15% and 27 % - special measures (larger windows, changes to room layout) are usually needed to provide adequate daylight.
- between 5% and 15% - it is very difficult to provide adequate daylight unless very large windows are used.
- less than 5% - it is often impossible to achieve reasonable daylight, even if the whole window wall is glazed.

- 13.17 Where room layouts are known, the No Sky Line (NSL) test can be employed to demonstrate daylight distribution in a room. Like VSC, the BRE guidance notes that the NSL figure can be reduced by up to 20% before the daylight loss is materially noticeable. In assessing the impact on surrounding properties, the room layouts of several properties are unknown and therefore NSL is not considered to be a valuable methodology as it cannot be applied consistently across all windows. The analysis therefore focuses on VSC.
- 13.18 Impact on daylight is typically framed in a relative sense: existing daylight levels are compared to proposed daylight levels. For this site however, policy guidance supports a broader evaluation of local daylight/sunlight conditions as a reasonable approach to allow account to be taken of “*local circumstances, the need to optimise housing capacity and scope for the character and form of an area to change over time*”.
- 13.19 The assessment of daylight focuses largely on *retained* rather than relative VSC levels and assesses whether the resultant light levels are acceptable for residential use in an urban location. Camden CPG and London Plan SPG support this approach and it is confirmed as appropriate by the independent review of the daylight and sunlight methodology to respond to the particularities of the site.

Daylight: Impact

- 13.20 For the reasons previously discussed, the daylight conditions in the existing (baseline) scenario reveal very good levels of daylight and sunlight compliance, with 345 of 365 (95%) existing windows assessed meeting the BRE criteria (i.e. levels of 27% and above) for VSC.
- 13.21 The impact on surrounding residential neighbours is summarised in the table below. The categories of impact are informed by BRE guidance and also correspond with those used in the Comparative Analysis Assessment. Discussion of the impact on non-residential buildings, including the school and hospital, follows after.

	Column A	Column B	Column C	Column D
Site	No. of residential windows tested	No. of windows BRE compliant (retained VSC of 27% or more)	No. of windows with retained VSC of between 26% and 15% (% of total)	No. of windows with retained VSC of less than 15% (% of total)
16 St Pancras Way	23	1 (4%)	14 (61%)	8 (35%)
4-12 Reapers Close (cons)	41	1 (2%)	25 (61%)	15 (37%)
16 – 22 Crofters Way (even)	21	6 (29%)	15 (71%)	0 (0%)
101 Camley Street	23	16 (70%)	7 (30%)	0 (0%)

103 Camley Street	125	33 (26%)	46 (37%)	45 (36%)
11-13 St Pancras Way A	106	69 (65%)	34 (32%)	3 (3%)
11-13 St Pancras Way B	142	44 (31%)	76 (54%)	22 (15%)
11-13 St Pancras Way C-D	103	10 (10%)	56 (54%)	37 (36%)
15-23 St Pancras Way	55	15 (27%)	22 (40%)	18 (33%)
Canal Boats 1-6	64	15 (23%)	20 (31%)	29 (45%)
Total	702	210 (30%)	315 (45%)	177 (25%)

Table 7: Impact on daylight to surrounding residential

13.22 From Table 7 it is evident that the majority of surrounding properties assessed will have windows that will have retained VSC levels of under 15%. The exceptions are No's 16 – 22 Crofters Way (even) and 101 Camley Street which retain VSC values above 15% to all windows. A more detailed assessment of those windows where retained VSC falls below 15% is provided below.

16 St Pancras Way

13.23 Located to the north west of the site, 16 St Pancras Way is a five storey residential building. The 8 windows that have a retained VSC of less than 15% serve bedrooms and kitchen diners and already have very low VSC levels. In 6 out of 8 cases the VSC would remain the same and for the remaining 2 windows, would only be reduced by 1%. The retained VSC levels across the rest of the building are considered to be acceptable for the context.

4-12 Reapers Close (cons)

13.24 These properties are small-scale terraced houses located to the northeast of the site. All rooms where retained VSC levels are below 15% serve WCs, bathrooms and hallways which can in part be attributed to their small windows. Given these are not habitable rooms, the impact on these properties is considered to be acceptable.

103 Camley Street

13.25 This property is located to the east of the site and is a recently constructed mixed use development, comprised of residential flats, student accommodation, and office and retail space. The analysis only includes windows up to the fourth floor as above this, daylight levels are expected to be of a good standard.

13.26 While many of those windows with retained VSC of less than 15% serve habitable rooms, in all cases where the affected windows serves living room, there is more than one window serving the room. The actual experience of daylight will therefore be better than the VSC results suggest. The NSL figures, which are based on the room as a whole, are more encouraging and there are scarce

examples where the ratio of impact is reduced by more than 20% of its former value.

11-23 St Pancras Way

13.27 This is a recently constructed, mixed-use development immediately to the west of the site, on the other side of St Pancras Way. It consists of commercial space on the lower floors with student accommodation on the upper floors.

13.28 Student accommodation, whilst understood as residential, is different in nature to long-term self-contained dwellings. It is more transitory in nature with the majority of occupants living there only for one academic year. It is also scarcely occupied during holiday periods. For these reasons, it is considered less sensitive than Use Class C3 residential. Whilst the number of windows that would retain VSC levels less than 15% are substantial, these occurrences are mostly confined to the first and second floors. Due to the proximity of the proposed development to the site boundary, it would be difficult to achieve the required densities without having an impact on these windows.

13.29 The applicant demonstrates that comparing the proposed scheme to the mirrored massing scenario, 12 windows serving student would have a lower VSC.

Canal Boats 1-6

13.30 Six canal boats on the adjacent Regents Canal have been assessed as residential use. Whilst some windows are significantly impacted, due to the high number of windows the canal boats have, the NSL test reveals that based on the room area, there are no examples where the ratio of impact is reduced by more than 20% of its former value.

13.31 Furthermore, officers consider canal boats should not be treated with the same parameters as other fixed dwellings. By their nature they are transitory dwellings that are only moored in the assessed locations for up to 14 days at a time. Secondly, they are situated at ground level and would likely be impacted to a similar extent with any increase in massing on the site.

Non-residential buildings

13.32 Whilst there is an argument for applying BRE guidance more flexibly in these instances, natural daylight is nevertheless an advantage to the occupiers' wellbeing.

St Pancras Hospital (located immediately to the south of the site)

North Wing

13.33 The rooms shown as patient areas would all retain at least 92% of their existing daylight distribution and in absolute terms all achieve at least 80% daylight distribution. This indicates that they will remain very well daylit with the proposal in place. Those rooms that would fall short would serve non-ward space and are more likely to have a greater use of artificial lighting.

New Ward, Ash House

13.34 All rooms within the main long sections, which are assumed to be the main patient areas, would retain at least 87% of their existing daylight distribution indicating that they will remain well daylit with the proposal in place.

Bloomsbury Day Hospital

13.35 This block is a day hospital and would therefore not include ward space. The office and examination rooms within the day hospital will have an expectation of good internal artificial lighting and are considered sufficiently well day lit and sunlit for their intended use. Despite this, we have analysed this property for daylight and sunlight.

13.36 Overall in daylight terms, the results indicate that there would be some reductions in daylight beyond the recommendations of the BRE Guidelines in VSC terms but all rooms retain between 87% and 99% of their existing daylight distribution indicating that they will remain well daylight with the proposal in place.

Sunlight

13.37 The BRE guidance explains that sunlight availability may be adversely affected if the centre of a window receives:

- less than 25% of annual probable sunlight hours, or
- less than 5% of annual probable sunlight hours between 21st September and 21st March and
- receives less than 0.8 times its former sunlight hours during either period; and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

13.38 The impact on sunlight is dependent on existing window orientation in relation to the new development. The BRE sunlight test was applied to all habitable rooms which have a window which faces within 90 degree of due south. If the Annual Probable Sunlight Hours (APSH) test has a reduction of 0.8 times than its former value then occupants are likely to notice an impact.

13.39 Testing the same properties as above, all units would continue to achieve reasonable levels of sunlight. Where there are windows impacted these impacts are considered to be minor and the rooms would experience good levels of sunlight. This has been confirmed by the independent review which raises no concern in respect of the level of sunlight received by neighbouring occupiers.

Overshadowing of outdoor amenity spaces

13.40 The BRE guide recommends that at least 50% of affected outdoor amenity space (gardens etc) should receive at least two hours of sunlight on 21 March. If new development means an existing garden or amenity area does not meet the above and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

13.41 The overshadowing assessment considers amenity areas in close enough proximity to be affected by shadow cast from the proposed development. As the sun path is located in the south, only the amenity areas located to the north-west

through to the north-east of the application site have been considered, which include:

- Regent's Canal
- Roof of 8-14 St Pancras Way

13.42 The results show that Regent's canal to the north east of the proposed development receives at least two hours of sunlight to 82% of its area on March 21st with the proposed development in place.

13.43 Furthermore, almost all of the canal will receive at least 1 hour of sunlight on March 21st. On June 21st, which shows that with the proposal in place 93% of the canal will receive at least two hours of sunlight.

13.44 The upper most roof of 8-14 St Pancras Way will receive at least two hours of sunlight to 98% of its area on 21st March with the proposal in place. This is well above the recommended 50% as stated in the BRE Guidelines and shows that the roof will retain very good levels of sunlight with the proposal in place. It has therefore demonstrated that the planning permission for PV panels at the neighbouring property as noted by a consultation response will be unaffected by the proposed development.

Outlook

13.45 The site is bound in two directions by roads and the third by the Regent's Canal. In respect of the properties to the opposite side of Regent's Canal it is considered these are a sufficient distance from the development for it not to result in harm to their outlook. With regard to the properties to the opposite side of Granary Street and St Pancras Way, the relationship between properties that would result by the proposed development is not uncommon within an inner London area and it is considered the proposal would not have a detrimental impact on the outlook experienced by these neighbouring properties.

13.46 To the north of the site is 8-14 and 16 St Pancras Way given the siting of the development in relation to these properties, it is considered there would not be a detrimental loss of outlook to these neighbouring residents.

Noise and disturbance

13.47 As part of the application the applicant has provided a noise report which demonstrates that survey results confirm that the east and south site boundary is currently exposed to high noise levels. Noise levels on the western site boundary adjoining the Regent Canal are significantly lower. The proposed development would include a number of flexible uses to the ground floor including A3 and A4 uses in some areas which have the potential to increase noise within the site. To minimise the impact of these on neighbouring properties conditions to control hours of use and ensure no music is played externally are recommended to mitigate the impact of the proposed uses. As discussed within the land use section above, the location of noise specific uses will be located in appropriate locations to safeguard the amenity of existing residents.

13.48 In respect of the impact of plant proposed to be located at roof level, based on the environmental noise survey data maximum plant emission levels have been

set in controlling fixed building services plant to an acceptable level. Noise limits apply at a position 1m from the façade of the nearest noise sensitive properties and include the total contribution of noise from all plant items associated with the proposed plant scheme that may run during any particular period.

13.49 Appropriate mitigation (e.g. screening, enclosure, directivity) will need to be incorporated into the final design. Specification of these systems shall ensure that noise levels are in line with the proposed building services plant noise limits included in the noise report, Table 11: Plant Noise Limits at the Nearest Noise Sensitive Premises.

13.50 It is therefore recommended that mitigation measures are secured via conditions to ensure they are adequate to protect the amenity of existing residents.

Overlooking

13.51 As noted within the Amenity CPG, it is good practice to provide a minimum distance of 18m between the windows of habitable rooms in existing properties directly facing the proposed development. The CPG also notes that where there is an existing street or public space, this space is considered to already provide an adequate separation between properties and so the 18m guideline will not apply.

13.52 With regard to the properties to the north east, on the opposite side of Regent's Canal, these are all over 18m from the proposed development. Therefore there would not be detrimental loss of privacy to these occupiers.

13.53 In respect of the properties to the south west on the opposing side of St Pancras Way, Building A would be sited 15m from 15-23 St Pancras Way. In terms of the impact on 11-13 St Pancras Way, this address is split into three blocks, with the ground floor of each in non-residential use. The upper levels of the building which house student accommodation are set back between 8.3-15.8m in some parts. The façade closest to the development site is 14.5m. Due to the presence of St Pancras Way it is considered there is sufficient distance between the proposed development and the neighbouring buildings for there to be no detrimental impact on the privacy of the occupiers of the student accommodation and residential units.

13.54 In respect of the non-residential properties to the south on the opposite side of Granary Street, these are some 16.4m from the proposal, given the existing road as noted within the CPG the 18m rule does not apply. Furthermore as these are not residential properties, they do not benefit from the same protection as permanent residential accommodation.

13.55 Due to the siting of the development in relation to the properties to the north west and as there are no openings on the flank elevation of Building A, the proposal would not impact on the amenity enjoyed by residents to the north west.

Neighbouring Amenity Conclusion

13.56 It is considered that although the proposed development would have some impact on the level of light received by neighbouring residents, this impact has been independently reviewed and is considered acceptable in the context of this inner London location. The proposal would not significantly harm the privacy or

outlook of the neighbouring properties. It is therefore concluded that existing residents would continue to experience a good level of amenity.

14 LAND CONTAMINATION

14.1 The historical review illustrates the site and industrial activities neighbouring the site have been involved in contaminative land use activities. However, the preliminary risk assessment indicates current sites activities offers a low risk to ground contamination, although there is a moderate/low risk of residual contamination from demolition of site buildings. The report recommends prior to demolition, undertaking an asbestos survey to identify all ACM, an intrusive geo-environmental investigation to include soil gas monitoring to establish the potential for gas/vapour ingress and the need for gas protection measures.

14.2 It is therefore recommended that a condition is used to secure an appropriate site investigation to be undertaken and a report including any recommendations for remediation to be submitted, prior to any construction works taking place.

15 BASEMENT IMPACT

15.1 Policy A5 (Basements) states that the Council will only permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms. Points f-k of Policy A5 set limitations in terms of the size of the basement, however there are exceptions to these on large comprehensive development, such as this proposal.

15.2 The development is proposing a part single, part two storey basement, known as B1 and B2 respectively. B1 would extend across all three plots and would measure 9,802sqm and B2 would extend solely under Plot C measuring 6,183.6sqm. The double storey section of the basement (solely to Plot C) would excavate between 7.4-10.3m under natural ground level. With respect of the single storey element, beneath Plot A this would measure between 4.9-6m beneath ground level and under Plot B 5-5.7m beneath ground level.

15.3 B1 would provide; cycle space, showers, plant, substation, commercial space, gym and servicing. B2 would provide the proposed B8 storage space and would access via 2 lift cores.

15.4 The basement would not be expressed at ground floor level. The only openings would be via the two access ramps, one to Plot B via St Pancras Way and the second to Plot C via Granary Street.

15.5 The application was accompanied by a Basement Impact Assessment (BIA). The independent review by the Council's basement consultant (Campbell Reith) concluded that the BIA is adequate and in accordance with policy A5 and guidance contained in CPG4 (Basements and Lightwells) 2015, subject to the completion of a Basement Construction Plan (BCP), which is required by S106. The applicant has satisfactorily demonstrated that the proposed basement would not cause harm to the built and natural environment and would not result in flooding or ground instability.

15.6 It is noted that the Canal and River Trust have commented that new piling works are close to the canal so a displacement and vibration monitoring regime will need to be in place for the work. This can be secured as part of the BCP. Thames Water have also requested a piling method statement which will be secured via condition.

16 AIR QUALITY

16.1 Camden Local Plan policy CC4 seeks to ensure the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the Borough.

16.2 An Air Quality Assessment (AQA) has been submitted as part of this application. The assessment confirms that Air Quality neutral is achieved for the entire development. Given the phasing of the proposed development with Plot C not come forward until around 2025, the air quality modelling may be out of date by this time. Therefore it is considered necessary to secure via condition that a new AQA is submitted to the Council for approval prior to the commencement of Plot C. This should address plot C in isolation, reflecting the detailed design of that plot, and should be expected meet planning policy and guidance in place at the time of a decision on condition discharge. It should cover and update all the elements covered in the existing assessment, and any additional methodological suggested by guidance in place at the time. Dispersion modelling of emissions and impacts would be a pre-requisite.

16.3 With regard to the impact of construction works on air quality, this would be covered by a Construction Management Plan (CMP) which would be secured via Section 106 legal agreement, as discussed within the Transport Section of this report. The AQA has confirmed that a range of environmental management controls would be developed and set out in CMP with regard to dust, this would include a range of monitoring of various equipment on site, the CMP itself would set out how these would be managed together with construction vehicle exhaust emissions and construction plan emissions.

16.4 With regard to the operation of the development, the AQA identifies that the development would have an insignificant effect on the local air quality. The development does include a number of mitigation measures to benefit air quality which include, provision of 808 long stay and 104 short stay cycle spaces, limiting the number of car parking spaces provided and provision of trees and planting across the site. Furthermore in terms of future occupier's use of the site, all hotel rooms and residential rooms would not be located at ground floor, thereby improving their air quality by locating them away from roads.

16.5 In light of the above, it is considered the development would be in accordance with CC4 of the Local Plan.

17 SUSTAINABLE DESIGN AND CONSTRUCTION

Policy review

- 17.1 The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use 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. It requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures.
- 17.2 Policy 5.2 of the London plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to:
- Target zero carbon for the residential part of the development, with a minimum of 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013 achieved on site and any remainder offset.
 - Secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013.
- 17.3 Where the London Plan carbon reduction target cannot be met on-site policy allows for a carbon-offset financial contribution which will be used to secure the delivery of carbon reduction measures elsewhere in the borough.
- 17.4 Developments are also expected to implement the sustainable design principles as noted in policy CC2 by
- Demonstrating that the residential development can achieve a maximum internal water use of 105 litres per day.
 - Achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

Energy

- 17.5 A range of energy and sustainability documents have been submitted as part of the application. The development has been designed in accordance with the Mayors energy hierarchy

Carbon Reduction(Be lean)

- 17.6 With regard to CO2 reductions, modelling for the CO2 reduction for the commercial areas, the applicant has modelled each plot individually and then also combined. Within all of the modelling the commercial elements of the development would meet the 35% reduction in CO2 emissions of Part L. This is met by enhanced building fabric and efficient mechanical and electrical systems.

17.7 With regard to the residential element, this would meet the onsite reduction of 35% at 54.9%. A financial contribution of £73,278 is sought, to reach zero carbon to offset this shortfall. This would be secured via Section 106 legal agreement.

Connection to existing Decentralised Energy Network (DEN) (Be clean)

17.8 The site is located near to the King's Cross, Euston and Somerstown heat networks. However the Council's Sustainability officer has confirmed it would not be expected that the scheme is obliged to connect into these existing networks. For Euston and Somerstown this is primarily due to the location of the site in relation to these existing DENs not making it economical to connect in. With regard to the King's Cross DEN, this is due to its siting on the opposite side of the canal making it difficult to connect to.

17.9 However the site is within the South Camden energy network cluster and is in close proximity to the Camley Street cluster study area. As noted within CPG3, to ensure energy is from an efficient source is used, developments will be expected to investigate the potential for connecting into an existing or planning DEN and provide a contribution for the expansion of DEN. Therefore, the Council would expect the developer to have active engagement with developers of adjoining sites which are likely to be coming forward in the near future with respect to a new local DEN. It would be expected that a study be undertaken to investigate the potential for the development to connect into any new DEN that would be as a result of developments within the locality coming forward. A Head of Term will be secured via the Section 106 legal agreement that secures the applicant undertakes the study in consultation with the Council to investigate the potential for a future DEN.

17.10 It is also necessary for the development to future proof its plant and pipework for later connection. It has been agreed during the course of the application that the site would future proof itself for potential connection to new DEN. Plot C allows for 50% additional capacity for future connections to the site heating system. The applicant has agreed to a Section 106 legal agreement which will commit to active connection to a wider network in the future when one becomes available which will include with a commitment to active engagement with local land owners as and when local development sites come forward.

On site CHP (Be clean)

17.11 The development is proposing a CHP + gas boiler system in two locations on the site, one to Plot A to serve Plots A and B and the second to Plot C.

17.12 Concern has been raised both by officers and by the GLA that the proposal of two energy centres is not appropriate on this site and should be reduced to one energy centre. Officers have negotiated with the applicant that upon the commencement of works on Plot C, the need for another energy centre will be revisited. Such an assessment will be secured via Section 106 legal agreement. At this time it is considered this solution would alleviate the concerns of officers.

Renewables (Be green)

- 17.13 The carbon shortfall payment may address the overall CO2 policy but the applicant is still required to achieve 20% of this target via renewables, the development would only be achieving 2.6% via renewables which includes 832sqm of PV for the whole site. PVs would be located to Plots B and C. It is not possible to accommodate on A due to the roof being occupied by a plant room.
- 17.14 It is recommended that full details of the PVs to both Plots B and C are secured by conditions, this would include detailed roof plans, 3D overshadowing impact assessment and a scheme of maintenance. Given Plot C would not be coming forward until 2023 and it is expected that PV and renewable technology will have advanced between now and 2023, a condition is recommended which looks again at the potential to provide renewables on site on Plot C prior to commencement starting on this plot to ensure the maximum amount of renewable technology is being provided on site.

Sustainability

BREEAM

- 17.15 For non-residential buildings there is a requirement to achieve a BREEAM Very Good (minimum) rating, aspiring to 'Excellent' and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).
- 17.16 BREEAM Excellent is being targeted for each area. To ensure the credits are met to achieve the Excellent ratings a design stage with pre-assessment checker and post-assessment BREEAM reports shall be secured via Section 106 legal agreement for each plot.

Cooling

- 17.17 In accordance with policy CC2 all development should demonstrate that measures to adapt to climate change have been implemented and that overheating risk has been managed including application of the cooling hierarchy. The cooling hierarchy is noted within paragraph 8.43 of the Camden Local Plan and includes 6 steps, which puts a preference on passive ventilation, mechanical ventilation (eg. Ceiling fans) and then active cooling (eg. Air conditioning). The supporting text to the policy also notes that active cooling will only be permitted where dynamic thermal modelling demonstrate there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy.
- 17.18 The modelling that has been undertaken demonstrates that mechanical cooling in the form of ceiling fans can be used to help mitigate overheating during hot summer months. However the development is proposing the use of active cooling to the private market units. The applicant has suggested within the submission this is an economic rather than technical justification. However the policy does not allow viability to justify active cooling where it is not technically justified. Therefore only the individual units that show a requirement to avoid significant or frequent overheating should be eligible for mechanical cooling.

17.19 Given this would only involve the residential units located in Plot C which would not be coming forward until 2023, it is considered necessary to secure via condition that no active cooling be installed unless it can be demonstrated that it is required.

Green Infrastructure/Biodiversity

17.20 The development includes biodiverse roofs to all buildings, details of which are to be secured via condition as outlined in the landscaping section above.

Building Management

17.21 Energy meters will be installed on all mechanical and electrical plant. These will be monitored through a building management system (BMS) which will allow facilities maintenance team to ensure constant energy efficient operation.

18 FLOOD RISK AND DRAINAGE

18.1 Camden Local Plan policy CC3 is relevant with regards to flood risk and drainage and seeks to ensure development does not increase flood risk and reduces the risk of flooding where possible.

18.2 Thames Water has been consulted and has no objections subject to conditions as noted within the consultation response section.

18.3 A Flood Risk Assessment has been submitted as part of this application. This document states that there is a very low risk of flooding. The development includes a Sustainable Urban Drainage System(SUDS) in order to reduce run off rates from the pre-development rates. It is proposed that part of the site will drain by gravity to the canal and the remaining areas will drain to the combined sewer. Attenuation storage is provided in the form of blue roofs and combination biodiverse/blue roofs on all buildings wherever possible and draing at controlled areas directly to the canal. Some areas of the roof are reserved for plant equipment and will therefore drain to below ground storage on each plot. The remaining external areas will also drain to underground storage before discharging at a controlled rate. This approach has been reviewed by the Council's Sustainability officer who considered it acceptable. It is recommended that details of the SUDS will be secured via condition. It is important to note that the Canal and River Trust has also recommended conditions in respect of run off into the canal.

18.4 With regard to exceedance events, in the event of flash floods, Camden as the lead local flood authority has a duty to ensure that applicants have due regard for protecting life and property as a result of their scheme. In exceedance events it can be assumed that the combined sewers will be over capacity and therefore cannot be discharged into. It is recommended that a condition is used to secure flow route plans for all plots, on and off site, having identified and marked a list of potential vulnerable locations on site and in the vicinity affected. The proposals should be shown not to increase flood risk to these locations; the applicant should indicate any additional proposed features designed to ensure this, following the above exercise.

19 MICROCLIMATE

- 19.1 London Plan policies 7.6 and 7.7 and Camden Local Plan policy A1 are relevant with regards to microclimatic impacts.
- 19.2 The applicant has submitted a pedestrian level wind assessment to support the application. The report notes that it is expected that thoroughfare locations are expected to have conditions ranging from acceptable for sitting use through to strolling, which is acceptable for the intended pedestrian use during the windiest season.
- 19.3 At main entrances, it is expected these areas would experience the desired standing or calmer wind conditions during the windiest season. This is suitable for the intended entrance use during the windiest season and would not require any mitigation. However secondary entrances are likely to experience strolling conditions near the south-east corners of Building B1 and C1 and the north west corner of C3 during the windiest season. It is noted within the report that given these are secondary entrances which will be used at the discretion of the individual retail unit, no mitigation measure are required. This approach is accepted, however the units have been designed with a degree of flexibility to have the ability to cater to a variety of end users. In the event one of the doors intended for secondary use come into use as a primary entrance a condition will be used to investigate if mitigation measure are required and what these measures shall entail.
- 19.4 With regard to amenity spaces at ground floor level, it is anticipated that these areas will have suitable sitting conditions during the summer season and no mitigation measures are required.
- 19.5 Terraces within the proposed development are expected to have sitting to strolling conditions during the summer season. Sitting conditions are acceptable for the intended amenity use. However, standing and strolling conditions to the terrace at Building C4 and at levels 2, 5 and 6 of buildings C2 and C4 are one and two categories windier than desired for the intended use and will require mitigation measures to alleviate conditions in these areas. A condition is recommended respect of details of these mitigation measures prior to the occupation of these areas.
- 19.6 With regard to balconies, these are likely to have sitting and standing conditions during the summer season. Sitting conditions are acceptable for the intended use, but standing conditions would require mitigation measures to target a sitting condition. Such details are recommended to be secured via condition prior to occupation.
- 19.7 Overall there would be no strong winds as a result of the proposed development. In respect of the impact on the adjacent canal, the wind assessment, notes that there would not be a significant effect on the amenity of the tow path and the navigation of canal boats throughout the year.

19.8 It is therefore considered, with the relevant mitigation measures in place the development would not have a detrimental impact on the local microclimate and would accord with the objective of Policy A1 and London Plan policies 7.6 and 7.7.

20 ACCESSIBILITY

Residential Units

20.1 All of the residential units have been designed in accordance with Part M4(2), Accessible and Adaptable Dwellings, which is similar to the superseded Lifetime Homes Standards. 7 of the units have been designed to meet Part M4(3)a, which is wheelchair adaptable units. Of these 7, 5 would be provided within the private market units and the remaining 3 within the intermediate rent. 1 unit has been designed to meet Part M4(3)b, which is wheelchair user. This 1 unit would be provided within the social rented accommodation which has been agreed with the Council's Affordable Housing Development Co-Ordinator with a view to meeting the needs of the Councils residents.

20.2 A condition is recommended to require the units to accord with Part M4(2) and Part M4(3) are to be secured via condition.

Hotel

20.3 In line with the requirements of the London Plan Policy 4.5 the development would be providing 9 accessible hotel rooms which would be 10% of the hotel rooms. It is recommended that details of these rooms are secured via condition, prior to the commencement of works on Plot B. These details shall accord with the Mayors guidance on accessible hotel accommodation.

20.4 Due to the level change across the site, the hotel entrance, lobby, restaurant and bar are located at different levels to provide level thresholds with the entrance route into the hotel. Step free access is provided between the different levels.

Flexible retail areas

20.5 All external entrances to the retail units would be provided with level access. Where units span across two levels due to the topography of the site, platform lifts will be provided to ensure level access.

Landscaping

20.6 Given the topography of the site, the landscaping has been designed to provide level access on routes across the site and into buildings. Where steps are provided these would comply with Part M of building regulations. Both steps and ramps would be accompanied with tactile surfaces and contrasting materials signalling changes in level and direction. All details of such material would be secured via the landscaping conditions.

21 TRANSPORT

21.1 The following transport considerations are covered below:

- Policy review
- The site
- Trip generation

- Travel planning
- Cycle parking
- Car parking
- Construction management
- Deliveries and servicing
- Public Highway Improvements directly adjacent to the Site
- Pedestrian, Cycling and Environmental Improvements in the local area
- Excavation in close proximity to the public highway
- Conclusion

Policy review

21.2 Camden Local Plan policies T1, T2, T3, T4, A1 and CPG7 (Transport) are relevant with regards to transport issues. The overarching aims of the transport policies is to consider the impacts of movements to, from and within a site, including links to existing transport networks. The Council seeks to prioritise sustainable transport which supports the primary aims and objectives of both the Camden Transport Strategy 2011 and the Camden Plan.

Trip Generation

21.3 As part of the Transport Assessment the applicant has provide a trip generation methodology for the uplift in office land which is based on the TRICS database, this predicts trip rates and modal split of developments based on survey information of comparable sites. TRICS is a recognised database widely used by transport professionals, TfL and London boroughs. It is important to note that the submitted trip generation does not include the existing trips currently taking place on site and only takes into account the uplift in office space, but does also include the other multiple uses of the site.

21.4 The selection of comparable sites in TRICS has considered key site characteristics including land use, PTAL rating of five or six, location, size of development and provision of parking facilities. A peak time for AM 08:00 – 09:00 and PM 17:00-18:00 trips prediction has been provided which will be the most busiest time, with lunch time not include; however this is unlikely to be significant as the majority of the trips generated by this site is for office users who are most likely to stay close or in their buildings for this time.

21.5 Officers are satisfied that similar sites have been used and will stand as a good prediction of the impact the development will have on the public highway.

Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Underground	246	40	286	44	251	295
Rail	183	27	210	31	188	220
Bus	93	24	117	23	96	118
Taxi	5	9	14	8	7	15
Motorcycle	9	1	10	1	9	10
Car Driver	0	1	1	0	0	0
Car Passenger	6	2	8	2	6	8
Cycle	43	4	47	5	43	48
Walk	62	17	79	16	64	80
Total	648	125	774	131	666	797

Table 8: Predicted increased expected across the site

- 21.6 Using the information within Table 8, it is expected that the development will create an additional 774 trip during the AM peak and 797 at PM peak time. This is a considerable increase in people working and living in this area and accessing public transport. It is anticipated to have a significant impact on the public highway, public transport capacity, specifically the bus service along St Pancras Way. The increase in numbers to and from the site will be mitigated somewhat by the increase in cycle facilities and the implementation of a Travel Plan.
- 21.7 In respect of other methods to mitigate the increase in trips to the site, a contribution towards Pedestrian, Cycle and Environment (PCE) improvements within the area is being sought should planning permission be agreed. This contribution would conduct work such as improvements to pedestrian link, cycling links, to address road safety concerns, mitigate new vehicle access and address air pollution issues. This will be addressed later in this report in greater details.

Public Realm Improvements

- 21.8 Access to the canal along the edge of the existing site is currently restricted, the London Plan requires development to consider ways of opening up the canal access as part of development and in Camden's Local Plan Policy T1 looks to improve connectivity for cyclist and pedestrians. The proposed development will include a large increase in public space, including a new square, this development will provide a shared space along the canal for cyclist and pedestrians. This will provide an alternative connection from Granary Street to St Pancras Way away from traffic.
- 21.9 This link, while being accessible for cyclists, is not envisaged as being a main commuter route, but instead will serve as a leisure route for enjoying the new space and the canal. There are points where this route is narrower than would be

required for a formal shared space, however officers consider that due to the expected low speed of cyclists this would be acceptable.

- 21.10 It is proposed to include a number of retail outlets along the canal front and the applicant has indicated areas they consider future commercial occupiers would wish to locate Tables and Chairs (T&C). At these points the effective footway is around 2.5 metres, which as stated above is considered acceptable as a leisure shared space. To ensure that there is no further restrictions to the space available for pedestrian and cycle movements, it is recommended that the developer to enter into a Walk Ways Agreement (WWA). This agreement will allow us to agree the designated area for T&C as well as ensure that the route is kept open for pedestrians and cyclist and minimum widths are meet. This is required as the Council is not able to issue T&C licenses on private land. The WWA can be secured via condition given it involves only land within the red line of the site.
- 21.11 To encourage cyclists to also use Granary Street and St Pancras Way some alterations to the public realm will be required. It is envisages that a similar scheme, but of a smaller scale, to the Royal College Street scheme, to introduce a contra flow cycle lane to facilitate to north bound movements for cyclist. The cost of these works will need to be provided by the developer, under a PCE contribution and will be discussed below in the relevant section.

Car Parking

- 21.12 The site is located within the Somers Town (CA-G) controlled parking zone and has a PTAL rating of 6b (Excellent). This means that the site is easily accessible by public transport. In the Camden's Local Plan T2 requires developments in such locations to be car free.
- 21.13 There are approximately 52 car parking spaces within the existing site, comprising 6 spaces at surface level accessed from St Pancras Way, 44 spaces at the ground floor of Plot B and 2 internally within Plot C. The existing parking is made available to Ted Baker, a current tenant of the site who will be retained as part of the proposed development.
- 21.14 Policy T2 of the Camden Local Plan requires all new developments to be car free, however an exception is made for existing occupiers who will be returning once development is complete. Paragraph 10.20 of the supporting text notes that "In redevelopment schemes, the Council will consider retaining or re-provisioning existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed."
- 21.15 The proposed development will include a basement car park within Plot B with 27 spaces (which includes 3 disabled bay), a reduction of 14 spaces in the basement and 25 spaces overall compared to the existing situation. As policy allows this re-provision of parking spaces, TfL and Camden find this in line with policy and are willing to accept this level of provision subject to a legal agreement to secure that should Ted Baker vacate the building the spaces would be converted to other uses if and when this current occupiers moves out.

- 21.16 All other elements of the development will be car-free with the exception of 2 on-site wheelchair accessible car parking spaces on Plot C, accessed from Granary Street. These are considered acceptable and would not have an impact on the public highway and are in accordance with Policy T2 point b.
- 21.17 The London Plan promotes the use of low emission vehicles, including through expanding the availability of electric charging points. Therefore we would require two vehicle charging points to be provided as part of the disabled provision, so that it can be used by electric vehicles, one in plot B at basement level one in plot C. This requirement should be secured by condition.
- 21.18 The proposal, with the exception of Plot B, would provide a car free development with no general parking spaces on the site, except those outlined above. This reduction is welcomed and will help to minimise the impact of the development on the local area and what is already a highly stressed Controlled Parking Zone with 112 permits for every 100 spaces available.
- 21.19 Should planning permission be granted, it is recommended that a Section 106 legal agreement sections that all residential units are car free and that the two disabled parking bay are fully converted for electric charging. As noted above it is also recommended that the Section 106 legal agreement secures that if Ted Baker leave the site, all general parking be converted to other uses if and when this business vacates the site.

Servicing

- 21.20 Due to the size of this development it has been essential to identify key areas on and off site, around the development, to provide servicing areas with the strategy towards waste collection being the same. Servicing for Plot A will be undertaken from a proposed footway loading bay on St Pancras Way. Servicing for Plot B will be undertaken predominantly from a single servicing bay in the basement, while larger vehicles will make use of the footway loading bay. Servicing for Plot C will be undertaken from the on-site service yard accessed from Granary Street which houses two service bays.
- 21.21 The two on-site service areas provide adequate space for vehicle to enter and exit the site in a forward gear, which has been demonstrated with swept path assessments. Servicing for plot A and larger service vehicles for Plot B is proposed to be from a new service bay off set from St Pancras Way (as seen in Fig 11). This proposal is acceptable and will continue to provide adequate space for pedestrians while in use.

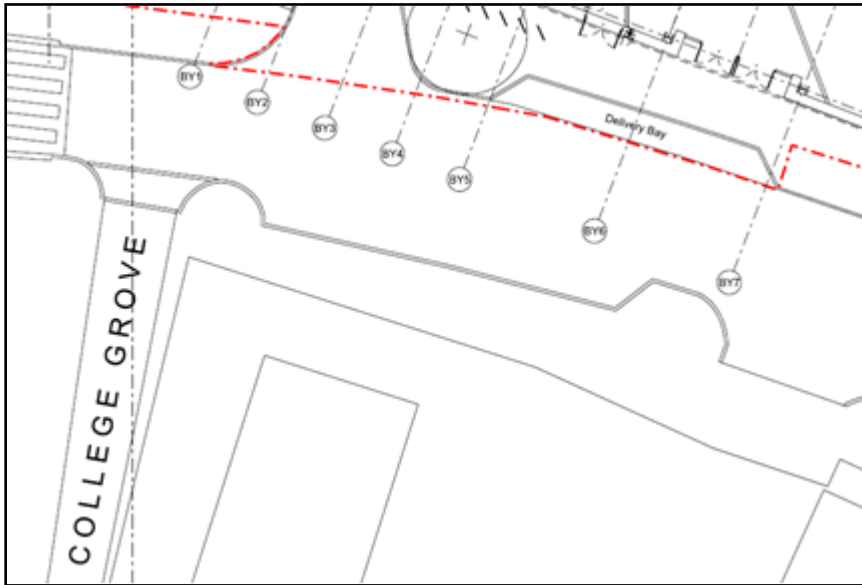


Figure 11: Location of servicing bay

21.22 In the proposed development it is predicted that there is to be up to 177 deliveries site wide in a 12 hour period. A full break down has been provided by the developer and can be seen in Table 8.

Land Use	Trips per day Assumed	Plot A	Plot B	Plot C
Office	0.2 trips per 100 sqm	20	38	66
Retail	0.59 trips per 100 sqm	7	-	31
Gym	0.04 trips per 100 sqm	-	-	1
Residential	8 trips per 100 units	-	-	6
Hotel	0.15 trips per 100 sqm	-	8	-
Total	-	27	46	104

Table 8: Predicted deliveries

21.23 The largest number of delivery and servicing trips will be generated by Plot C (104 trips). When spread over a typical 12 hour daytime period, this could equate to 8-9 delivery and servicing trips per hour.

21.24 The majority of deliveries are expected to be undertaken within 10 minutes, with a small number expected to take longer. It is considered that, depending on the size of the vehicles, the servicing area will comfortably accommodate around 3 vehicles simultaneously, bearing in mind that some deliveries will be undertaken by bicycles, motorcycles and cars and will therefore require less space. As such, the servicing area would be expected to accommodate circa 18 delivery and servicing trips per hour. On this basis, the estimate of 8-9

deliveries per hour can be accommodated comfortably within the service yard proposed.

21.25 While it is considered the servicing facilities would be adequate, due to the large number of servicing vehicles expected it is felt that a Service Management Plan(SMP) will be required for this site, to ensure that the vehicles are properly managed and that safety measures are in place to protect the public. Therefore if planning permission is granted it is recommended that the Section 106 legal agreement secures an SMP.

Travel Plans

21.26 The development will have an impact on the local transport network, as discussed above through increased office, retail and residential trips. These will affect St Pancras Road, Royal College Street, St Pancras Way, Granary Street, Camley Street, St Pancras Station, King's Cross Station, Camden Road Station, bus stops located in the general vicinity of the site and many of the roads and footways in the local area. It will therefore be essential to encourage and promote sustainable modes of travel to and from the site when the development is occupied.

21.27 The developer submitted a Framework Travel Plan (FTP) as part of this application which proposes a number of actions and targets to achieve. However for a site of this size a Travel Plan (TP) for each of the plots and uses of the site to cover all parts of the site that meet TfL thresholds for TP will be required, TP requirements are show in Table 9 below.

	Local Level Travel Plan	Strategic Level Travel Plan
A1 food/ non- food retail	More than 20 staff but less than 1,000m ²	Equal or more than 1,000m ²
A3/A4/A5 food and drink	More than 20 staff but less than 750m ²	Equal or more than 750m ²
B1 including offices	More than 20 staff but less than 2,500m ²	Equal or more than 2,500m ²
B8 Warehouse and distribution	More than 20 staff but less than 2,500m ²	Equal or more than 2,500m ²
C1 hotels	More than 20 staff but less than 50 beds	Equal or more than 50 beds
C3 residential	Between 50 and 80 units	Equal or more than 80 units

Table 9: Travel Plan Requirements

21.28 With each TP, the targets would need to be focused on reducing car use, reducing pressure on the public transport system and the promotion of sustainable transport such as walking and cycling. These will need to be tailored to each of the buildings needs and unique facilities available.

21.29 It is recommended that a TP for each of the following areas are secured by Section 106 legal agreement and submitted to the Council for approval, together with the associated monitoring fee, as noted in Table X below.

21.30 Each of these areas have met the threshold and are large enough to warrant their own TP, they will each required a Travel Plan Co-ordinator (TPC) to put into action the initiatives and targets agreed with the Council who will need to be made know to the council once chosen. The success of the TP measures will depend on the commitment and initiatives undertaken by the TPC, it is also highly advised that a site-wide Steering Group be put in place to allow the TPCs to co-ordinate their effort as well as put in area wide initiatives.

Use	Plot/s	Level of TP	Applicable monitoring fee
Business	A	Strategic	£6,432
Business	B	Strategic	£6,432
Business	C	Strategic	£6,432
Retail and Gym	A and C	Local	£3,216
Residential	C	Local	£3,216
Hotel	B	Strategic	£6,432

Table 10: Travel plan monitoring fees

21.31 As discussed above, there will be the retention of 30 car parking spaces within the basement of Building B. It is requested that a Work Place Travel Plan is secured for Building B to monitor the use of this space and investigate if the space could be better repurposed for a more sustainable use.

21.32 The TPs outlined above would be secured by s106 legal agreement. It is also recommended to secure the relevant financial contributions of £6,244 to cover the costs of monitoring each plan. The individual TPs for each organisation and/or site would need to take effect at first occupation, with the first survey to be conducted at 75% occupation or at 6 months after occupation whichever comes first with the TPC appointed 3 months before occupation. This would also need to be secured by a Section 106 planning obligation if planning permission is granted.

21.33 Transport for London encourages developers to use the TRICS database (formerly TRAVL) for trip generation predictions. We will require the applicant to undertake a TRICS after study and provide TfL and Camden with the results on completion of the development. TfL would then be able to update the TRICS database with the trip generation results for the various land use categories associated with this development. We will seek to secure the necessary after surveys and results by Section 106 agreement as part of the Travel Plan review and monitoring process.

Cycle Parking

21.34 Policy T1 of the Local Plan requires developments to sufficiently provide for the needs of cyclists. The London Plan provides guidance on minimum cycle parking standards and these are outlined in Table 6.3 of the London Plan.

21.35 This would equate to the following requirement to meet London Plan Standards:

Use Class	Long Stay Requirement	Proposed Long Stay	Provision Split			
			Plot A	Plot B	Plot C	Total
Flexible A1-A4 5,858sqm	9-34	45	6	-	39	45
B1	605	654	117	157	380	654

54,522sqm						
C1 87 bedrooms	5	5	-	5	-	5
C3 73 units	107	126	-	-	126	126
D2 16 Staff, 1,601sqm	2	2	-	-	2	2
Total		832	123	162	547	832

Table 11: Cycle Parking Spaces

- 21.36 A total of 832 Long Stay bicycle storage spaces is proposed site wide to be provided. These would be located in secure and sheltered areas at basement and ground floor level in each Plot. This will be introduced as each phase of the construction is complete and plots A-C are occupied. Showers, lockers and changing facilities for staff will also be provided with in close proximity of the individual parking areas.
- 21.37 The commercial, retail and residential cycle storage would be provided in the form of two-tier racks, for plots A and C with the long stay parking located at basement level, access for plot A on the west side of the site off St Pancras Way with step free access via a lift and an alternative is via the stairs. For Plot C, buildings C1 and C2 have a number of access points from the new public space that lead into the basement via lifts as a step free option. For building C3 access is via Granary Street via a lift or steps as an alternative option.
- 21.38 Plot B has the cycle parking located at ground floor with the access step free on the north side of the building, along with shower, locker and changing room facilities.
- 21.39 With regard to short stay cycle parking spaces, the requirement is to provide 46-184 visitor spaces, this varying level of spaces is due to the flexible uses proposed. The applicant is proposing 104 visitor spaces located at various location around the new public space being unlocked by the proposed development. These will be in the style of the classic Sheffield stands which has been discussed with Camden as to the best location for and would be finalised as part of a condition of landscaping if planning permission is granted.
- 21.40 These proposals meet London Plan requirements and in some places exceed the required amount, they are considered high quality and in line with Camden's design guidance. It is also a requirement as part of the London Plan to ensure that 5% of spaces should be suitable for use by larger bikes such as cargo bikes and those used by disabled cyclists.
- 21.41 If planning permission is granted a condition is recommended to secure 832 long term spaces, split up as outlined in Table 11 with 5% suitable for larger bikes and 104 visitor parking bays distributed across the new public space. Given the phasing of the development, the conditions would be appropriately phased to ensure the suitable provision of cycle spaces associated to each phase of the development.

Management of Construction Impacts on the Public Highway in the local area

- 21.42 The site is located to the north of St Pancras Hospital directly between St Pancras Way and the Canal to the east and west retrospectively. The proposal would involve a significant amount of demolition and construction works. This will generate a large number of construction vehicle movements during the overall demolition and construction period. The proposed works will therefore have a significant impact on the operation of the public highway in the local area and will need to be managed effectively and with careful consideration. Officers primary concern is public safety but it is also necessary to ensure that construction traffic does not create (or add to existing) traffic congestion or impact on road safety or amenity of other highway users. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality). The construction needs to be effectively managed to mitigate the impact to neighbouring residents.
- 21.43 An outline construction management plan (CMP) has been submitted in support of this planning application. This provides some information to describe the proposed works and how they would be undertaken. Although it requires further detail, it is a good example of what is required at this stage in the process. Officers have had a number of discussions with the developer about what facilities would be available to them during the build and what restrictions they will have to work to.
- 21.44 The site is composed of three key plots, A, B and C. The entire construction of the site is outlined to take six years, with site A to be demolished first and constructed first, then once completed site B would be demolished and constructed then finally site C would be instigated. Taking each site one at a time, each site will be complete before moving onto the next. This will mean it will be easier to manage the construction in smaller phases rather than working on the site as a whole.
- 21.45 The usual life span of a CMP for the majority of major developments is 18 – 24 months, as this is a six year build with three distinct phases we will require a CMP for each phase which will need to be submitted before the each plot proceeds.
- 21.46 It is required that there is a full investigation into the use of the Canal as an alternative to vehicles using the public highways. The Canal is a valuable and underused resource and it is Council policy to make use of its facilities where ever possible. This site is in an ideal position to make use of its capacity. Such an investigation will be secured as part of the CMP.
- 21.47 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. Therefore, if planning permission is granted a CMP for each of plot A, B and C should be secured as a Section 106 planning obligation if planning permission is granted. This would provide a mechanism to manage/mitigate the impacts which the proposed development

would have on the local area. The CMP would need to be approved by the Council prior to works commencing on each phase on site.

- 21.48 It is also recommended that a financial contribution of £25,000 for each CMP for each phase monitoring be secured as a section 106 planning obligation if planning permission is granted.

Pedestrian, Cycling, Environmental and Public Realm Improvements

- 21.49 This development will result in a significant increase in people working and living in this area and will have a major impact on the public highway and public transport. The trip generation of the site as demonstrated in the Transport Assessment notes a net increase of 774 trips in the morning peak hour and 797 in the evening peak hour. This is a significant increase in trips in this area. The development footprint extends outwards, especially along St Pancras Way where an increase in servicing will need to be facilitated.

- 21.50 Officers have noted below a number of schemes which it is recommended the developer contributes to, to help mitigate the impact of the development. These schemes address the key routes to, from and around the site that need addressing. These are based on an assessment of how it is expected people will walk and cycle to the site as well as where the most likely transport interchanges that would be used are located and ways of improving and increasing capacity along these routes.

Pratt Street pedestrian and Cycle improvements

- 21.51 Subject to consultation and approval there are pedestrian and cycling improvements planned for the western section of Pratt Street. The proposed development is likely to add further pressure on the eastern section of Pratt Street, a contribution of £300,000 is sought to extend the scheme to cover the section of the street closest to the development.

St Pancras Way Cycle redevelopment schemes

- 21.52 St Pancras Way is likely to come under significant additional pressure as a result of the development with additional trips by foot, cycle and motor vehicle expected on this already congested street. Improvements to the pedestrian and cycling environment are required to mitigate this impact, introduction of a contraflow cycle lane on the street and upgrades to the existing facility would be considered as part of this scheme. A contribution of £600,000 is sought to mitigate the impact of the development on St Pancras way.

Granary Street Improvements

- 21.53 The south end of the development does not currently draw vehicles onto Granary Street, the new vehicular access on Granary Street as part of this development will put additional pressure on the street. An enhancement to the pedestrian environment on this street would help to mitigate the additional conflicts generated by vehicles accessing the site and an increase in the number of pedestrians and cyclists using this street to access the development. A contribution of £350,000 is sought to develop a scheme to mitigate the predicted issues on Granary Street.

Camley Street environmental and urban design improvement

21.54 This is to address the wider connections on Camley Street, which will be a key link to the development. We will look at environmental improvements, safer cycling and pedestrian links. Estimated Contribution toward scheme £250,000.

21.55 It is therefore considered that a financial contribution of £1,500,000 as a section 106 planning obligation if planning permission is granted would be required to mitigate the impact of the development.

Highway and Public Realm Improvements directly adjacent to the site

21.56 Policy A1 of the local plan states that 'Development requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces'.

21.57 As part of these works, alterations will be required along St Pancras Way and Granary Street. The development would leave a number of crossovers along St Pancras way redundant with the exception that a crossover will need to be maintained for access into the car park and service yard in Plot B. There will also be the introduction of two crossovers to Granary Street, one for the service yard and another for the disabled parking.

21.58 Given these works together with the detailed design of the location of the servicing bay along St Pancras Way a financial contribution of £91,771.29 is sought to be secured via Section 106 legal agreement. This would allow the proposal to comply with Policy A1.

21.59 As noted above a servicing bay will be located along St Pancras Way, however during the detailed design phase

21.60 We will also need to investigate the best location for a service bay along St Pancras way, this has already been discussed with the applicant and a location is indicated on the site plans, however we will need to go into a more detail design phase before it can be implemented. Granary Street which is currently very much dead space will need the introduction of two crossovers one for the service yard and another for the disabled parking.

21.61 Further to this Transport for London have requested a contribution for four new Legible London signs, this will help with Way Finding for pedestrian and help to encourage people to access the site as well as find transport interchanges on foot. Therefore if planning permission is granted a sum of £32,000 has been requested by TfL for the proposed signage, to be secured via Section 106 legal agreement.

Excavation in close proximity to the public highway

21.62 The proposal would involve basement excavations directly adjacent to the public highway along both St Pancras Way and Granary Street. The Council

has to ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations.

21.63 The applicant would be required to submit an 'Approval In Principle' (AIP) report to the Council's Highways Structures & Bridges Team within Engineering Services as a pre-commencement Section 106 planning obligation. This is a requirement of British Standard BD2/12. The AIP would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site. The AIP would also need to include an explanation of any required mitigation measures.

21.64 The AIP and an associated assessment fee of £3,600 would need to be secured via Section 106 planning obligations if planning permission is granted.

Conclusion

21.65 In respect of transport related matters, it is considered that the proposed development would be acceptable subject to appropriate conditions and Section 106 obligations. The development would reduce the number of one site car parking spaces, promote sustainable modes of transport and improve routes across and around the site. With regard to construction this would be managed effectively via appropriate Section 106 legal agreements. It is therefore considered the development would accord with the relevant policies of the Local Plan and wider policy framework.

22 CANAL BRIDGE

22.1 As noted at the beginning of the report, the Camley Street area is an area of regeneration focus under the Councils CIP initiative which seeks to address connectivity issues. The Council is currently drafting a SPD for the area. The site is situated within the wider Camley Street area and has a strong role to play in contributing to improvements in the local area.

22.2 During the course of the applications, officers have negotiated a contribution of £1,000,000 which would top up the existing monies the Council has secured from development in the surrounding area, including the Travis Perkins development and 101 Camley Street to build a bridge across the canal.

22.3 It is important to note the bridge does not form part of this planning permission. The applicant has committed to leading on the delivery of the bridge. Officers have discussed the potential location of the bridge in both the north and south parts of the site. Due to the topography of the site landing the bridge in the south is the applicants preference as landing in the north would comprise Building A. The planning permission for 101 Camley Street, included the provision of a bridge which would land to the south of 206 St Pancras Way as shown in the image below. The exact location of the bridge could be improved on from the proposal below and the applicant has made a commitment to lead on the design and delivery of the bridge, which is welcomed. This commitment will be secured via the Section 106 legal agreement given it would involve neighbouring land owners.

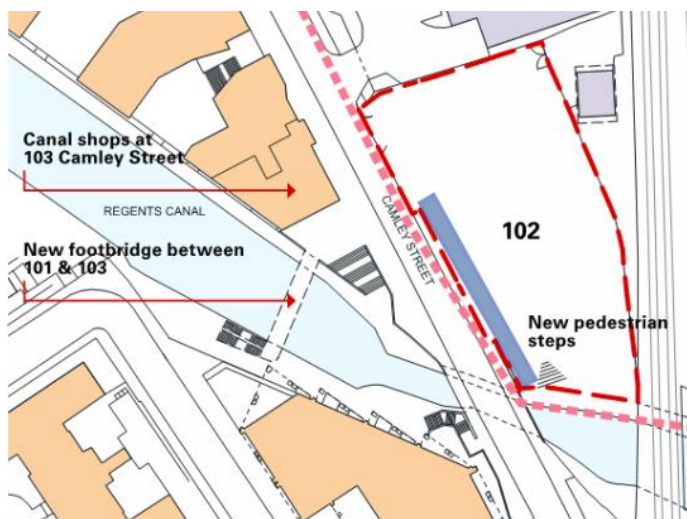


Figure 12: Approved location of footbridge across canal

22.4 It is considered this contribution is welcomed and can be considered a public benefit of the development. This benefit can aid in mitigating the delay in the delivery of housing and open space on site as it will secure a site that will feed into the sustainability of the site by linking it to the wider area.

23 SAFETY AND SECURITY

23.1 Camden Local Plan policy C5 (safety and security) and CPG1 (Design) are relevant with regards to secure by design.

23.2 The Designing Out Crime officer was consulted prior to the application being submitted and was involved in the design process. The applicant is seeking to achieve 'Secure by Design' on the residential blocks and have improved permeability around the site to reduce opportunities for crime. In light of this it is considered the development has been well designed to minimise opportunities for crime in accordance with C5.

24 REFUSE AND RECYCLING

24.1 Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance 1 (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.

24.2 All refuse rooms are located within the basement level B1, with dedicated basement level storage areas for commercial, residential and hotel use. It will be the responsibility of the site managers to ensure waste is transferred to these consolidated areas prior to collection. The rooms will accommodate Eurobins to provide space for general waste and recyclables.

24.3 With regard to collection, waste for the retail elements will be stored within individual units and transferred for daily collection by the unit managers. For plots A and B waste will be collected on-street from the footway loading bay or

kerbside of St Pancras Way and for Plot C it would be collected from the on-site service yard.

24.4 In respect of the residential and employment/commercial uses there will be separate collection arrangements established upon occupation.

24.5 It is recommended that full details of the waste storage and collection together with its management are secured via condition. The Servicing Management Plans will also include details of servicing for the commercial and hotel use.

25 HEALTH AND WELLBEING

25.1 Policy C1 of the Camden Local Plan notes that the Council will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. In accordance with the policy the applicant has submitted a Health Impact Assessment (HIA).

25.2 With the HIA, it is noted that the development is expected to result in 120 residents on site. It is therefore likely that the impact on GP registration is marginal and there are a number of nearby practices offering a full range of services within a one mile walk. It is therefore not required to provide any such health facility on site. The Council's Public Health Strategist has reviewed the HIA and agrees with this approach.

25.3 In light of this the applicant has looked at the environment around the development, making good use of its proximity to Regents Canal to open the area up in ways that promote social interaction and active travel, and a number of features in line with the "Healthy Streets Approach" as developed in the Mayor's Transport Strategy and supported by Camden. It is considered this adds positive health impacts to the development.

25.4 The HIA describes how the development responds to policies in Camden's Local Plan that support health and wellbeing, including housing quality, accessibility, car-free residential housing, employment opportunities, noise, and air quality, it is therefore considered to be in accordance with the objectives of Policy C1.

26 EMPLOYMENT AND TRAINING OPPORTUNITIES

26.1 The proposed development is large enough to generate significant local economic benefits. Camden Local Plan policies E1 and E2 and Camden Planning Guidance state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.

26.2 The Council welcome the increase in employment space on the site and the provision of employment floorspace that will enable an important local employer to remain within the Borough and grow and contribute to the economic growth

of the Borough. It is also welcomed that the proposal references flexible floorplates which can be sub-divided to be suitable for co-working, cellular SME space and larger businesses.

26.3 The proposal provides a significant quantum of workspace in addition to the floorspace to be occupied by Ted Baker. The development would provide a significant amount of flexible workspace. The Regeneration Statement notes that the scheme could attract 'businesses of all sizes in particular start-ups, small and medium sized enterprises'.

26.4 In line with CPG8, a range of training and employment benefits are to be secured in order to provide opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured via S106 and will comprise of the following.

26.5 Construction Phase

- The applicant is required to work to a target of 20% local recruitment when recruiting for construction-related jobs as per clause 8.28 of CPG8.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the Kings Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Kings Cross Construction Skills Centre.
- The applicant should recruit 1 construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.25 of CPG8. Recruitment of construction apprentices should be conducted through the Council's Kings Cross Construction Skills Centre.
- The applicant must also sign up to the Camden Local Procurement Code, as per section 8.3 of CPG8.
- The applicant should deliver at least 1 supplier capacity building workshop/Meet the Buyer event to support Camden SMEs to tender for construction contracts in relation to the development.
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

26.6 Where the end use occupier is known, as part of the s106 agreement the Council will seek an agreement with the developer to provide a specified number of apprentice or work experience places within the development. The applicant should commit to a package of employment and training opportunities such as end use apprenticeship and work experience placements, at Ted Baker, the hotel and associated bar and restaurant. These should be secured via a S106 legal agreement and include:

- The applicant provide a rolling programme of apprenticeship recruitment, in line with CPG8 clause 8.33, to be recruited through the Council's

Economic Development Team. The apprenticeships could be within a range of sectors (examples include hospitality, business administration, finance, customer service, IT and retail).

- The applicant provide a rolling programme of work experience placements for Camden residents within the completed development. Recruitment for non-construction work experience placements should be conducted through the Council's Economic Development team.
- The applicant working with local employment support providers, including but not limited to KX Recruit and Somers Town Job Hub, to promote end-use employment opportunities to local residents.

26.7 With regard to financial contributions, the Council will seek to negotiate section 106 contributions to be used by the Council's Economic Development service to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden. Based on the current information available, those contributions would be calculated as follows:

- Uplift in employment floorspace(not including the flexible uses):
Net increase in floorspace 28057sq. m GIA / 12sqm [space requirement per full time employee] = 2338 full time jobs created
Full time jobs created **2338 x 21%** [% of Camden residents who work in Camden] = **491 x 35%** [% of employees requiring training] = **171.85 x £3,995** [£ per employee requiring training] = **£686,537.25**
- Provision of a hotel:
No of bedrooms x 0.5 [number of employees per bedroom] = 43.5 full time jobs created.

Full time jobs created **43.5 x 21%** [% of Camden residents who work in Camden] = **9.135 x 35%** [% of employees requiring training] = **3.197 x £3,995** [£ per employee requiring training] = **£12,773.01**

26.8 The proposals are therefore in accordance with the guidance set out in CPG5 and policies E1 and E2 of the Camden Local Plan. It is important to note these are the policy requirements for the development, the applicant has also committed to offering additional employment and training opportunities as part of the package of measures to mitigate the delay in the provision of housing and open space as discussed in the phasing section above.

27 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Mayor of London's Crossrail CIL

27.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL). Based on the Mayor's CIL charging schedule and the information provided as part of the application, the Mayoral CIL is based at £50 per sqm. Taking the net increase in floorspace as 54,155sqm this equates to a Mayoral CIL payment of £2,707,750. This would 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, and subject to indexation in line with the construction costs index.

Camden CIL

27.2 The proposal would be liable for the Camden Community Infrastructure Levy (CIL). The site is located within Zone B. The estimate is based on the uplift of floorspace and the proportion of market housing and commercial floorspace proposed, different rates are applied to different uses. The below payments will be collected for each use:

- Office (Use Class B1) - £701,375
- Residential (Use Class C3) - £1,890,250
- Hotel (Use Class C1) - £144,690
- Flexible Retail (A1-A4) – £152,600
- Gym (D1) – no payment required
- Storage (B8) – no payment required

27.3 The above results in a total Camden CIL payment of £2,888,915.

28 PLANNING OBLIGATIONS

28.1 The following contributions and heads of terms are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

Contribution	Amount (£)
Highways	£91,771.29
Pedestrian, cycling and environmental contributions	£1,500,000
Contribution towards bridge	£1,000,000
Legible London signage	£32,000
CMP Monitoring fees	£75,000
Travel plan monitoring for Workplace	£21,948
Travel plan monitoring for Residential	£3,216
Travel plan monitoring for Hotel	£6,244
Approval in Principle (AIP) report – review and sign off	£3,600
Deferred Affordable Housing Contribution	£3,063,771
Affordable Housing payment in lieu of phasing	£381,694
Carbon Offset Contribution	£73,278
Post Construction Training	£699,310.26
LWT Canal Project	£46,000
TOTAL	£7,136,374.29

28.2 Heads of Terms

Affordable housing

- Target rents
- Affordable housing and Deferred Affordable Housing Contribution (capped at the equivalent of 50% of proposed flats)

Basement

- Basement Construction Plan (BCP)

Employment and training

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, or a specified number (to be agreed) of work experience placements following the completion of the building. Work experience placements can be organised through the council's work experience coordinator, Tom Humphreys, who can be contacted via Thomas.Humphreys@camden.gov.uk.
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction or non-construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 8.19 of CPG8.
- The S106 should broker a meeting between the end user(s) of the ground floor retail units and the Economic Development team to discuss our employment and skills objectives.
- The applicant should deliver at least 1 supplier capacity building workshop/Meet the Buyer event to support Camden SMEs to tender for construction contracts in relation to the development.
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.
- Ted Baker to commit to the Camden STEAM Pledge by becoming a Bronze STEAM Employer and identify 10 STEAM Ambassadors per year from their staff to support the work of the STEAM Hub and engage with schools and young people through creative, digital and scientific learning.
- Package of post construction local employment benefits including

- 3 apprenticeships each year for 5 years;
- 6 work experience placements per year to Camden Schools for 5 years, at no less than 2 weeks long;
- 1 supported internship for a Camden residents with Learning Disabilities for a minimum of 1 year and linked into an employment opportunity at the end of the placement.

Energy and sustainability

- BREAAAM Excellent compliance detailed design and post construction review, targets as stated in the energy and sustainability statements for Energy, Materials and Water
- Energy measures including on-site renewables
- Energy provisions to be secured through Energy Efficiency & Renewable Energy Plan - each plot should achieve a minimum 35% CO2 reduction beyond Part L 2013 AND 20 % reduction through renewables as defined within the approved statements.
- Sustainability measures for the whole development in accordance with approved statements
- Review of need for additional energy centre prior to works on Plot C
- Review of connection into DEN when future development comes forward in surrounding area

Land Use

- Provision of 346sqm of floorspace at a rate of 30% for a community charity for 10 years;
- An Affordable workspace plan to provide 1,858sqm of affordable workspace (AWS) which would be marketed at 50% (incorporating 176m2 at 30% for 10 years) of market value and retained for 50 years including: phasing and location, transfer to affordable workspace provider, costs, ownership, types.

Landscaping, trees and open space

- Phasing of public open space
- Open space management plan
- Commitment to lead on the bridge implementation

Transport

- Car free housing
- Construction Management Plan (CMP) for each plot and associated requirement for a Construction Working Group to be formed prior to commencement together with three financial contribution of £25,000 for each CMP monitoring for each of Plots A, B and C.
- Financial contribution for highway works directly adjacent to the site.
- Level Plans are required to be submitted for all plots at the appropriate stage showing the interaction between development thresholds and the Public Highway to be submitted to and approved

by the Highway Authority prior to any works starting on-site. The Highway Authority reserves the right to construct the adjoining Public Highway (carriageway, footway and/or verge) to levels it considers appropriate.

- Financial contribution for pedestrian, cycling and environmental improvements in the general vicinity of the site (i.e. aspects of the wider vision for public realm improvements within the public highway).
- Financial contribution of £32,000 for Legible London signage.
- Delivery and Servicing Management Plan, provided for each Plot.
- Should Ted Baker pass on ownership of the building to a third party, that all general parking bay will be repurposed to non-car usage.
- Workplace Travel Plans (x6) and associated monitoring contributions.
- Approval in Principle (AIP) report for all elevations of the site where a basement is adjacent to the public highway (e.g. Brill Place). A financial contribution of £1,800 per elevation is also required in connection to the review and sign-off of the AIP from our Structural Engineering service, and this is required prior to any works starting on-site.

29 CONCLUSION

29.1 The proposed development, is a well considered scheme which is as a result of extensive pre-application discussions and discussions during the course of the application.

29.2 With regard to land use, the development would provide a good mix of land uses which will contribute towards growth within the Borough. The mixture of uses on the ground floor will ensure active frontages to all buildings to contribute towards the vitality and viability of the area. The provision of B1 floorspace will enable the current occupier of one of the buildings, Ted Baker to grow and development in the Borough alongside other businesses. The provision of affordable workspace will ensure that small and medium sized business are also given the opportunities to grow within the Borough. The provision of housing and in particular affordable housing are a key benefit of the development.

29.3 The applicant has sought to demonstrate a commitment to high quality design that takes into account the setting and use of the canal and its habitat, which is designated as a conservation area. The proposal responds in scale, proportion and detailing to the locality and wider areas to the south with the detailed design taking used from the historic context of a canal side development.

29.4 The development proposes a new route along the canal which can be accessed by all, together with a route through the site providing options for traveling north and south for pedestrians and cyclists. All of which will be set around a landscaped area with the aim of creating a sense of place.

29.5 Given the delay in bringing forward the housing and open space, officers have sought a package of benefits which would mitigate this delay. This includes a contribution towards affordable housing, a contribution towards building a bridge across the canal and the commitment from the applicant to lead on this, the provision of floorspace for a local charity and an enhanced package of employment opportunities for Camden residents. All of these points are considered to be public benefits which would compensate for the delay in the provision of housing and open space on the development and are supported by officers.

29.6 Overall, this is a comprehensive phased mixed use development, which is well considered, but not without difficult balances being struck. However officers are confident that the planning balances are right and the overall benefits of this proposal outweigh any perceived harm. It is therefore recommended for approval subject to conditions, Section 106 and referral to the Mayor.

30 RECOMMENDATION

30.1 Grant conditional planning permission subject to Section 106 Legal Agreement and referral to the Mayor of London for his direction