

The Ugly Brown Building, St Pancras Way

Local Planning Authority: Camden

local planning authority reference: 2021/2671/P

Strategic planning application stage 1 referral

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

The proposal

Demolition of existing building, and redevelopment to provide a nine-storey building with two basement levels for flexible Use Class E, Use Class B8 storage, Sui Generis use, a two-storey Pavilion for flexible Use Class E and Sui Generis use, along with associated cycle parking, servicing, hard and soft landscaping, public realm, and other ancillary works, alongside amendments to Plot C within planning permission 2017/5497/P, namely to increase affordable housing provision.

The applicant

The applicant is **Reef Estates Limited** and the architect is **Bennetts Associates**.

Strategic issues summary

Land use principles: The development is supported in land use terms subject to the Council restricting the maximum quantum of floorspace permissible in relation to both retail and bar uses, noting the site's out of centre location. The proposed increase in the quantum of affordable workspace to be provided is strongly supported, though confirmation that this floorspace would be suitable for SMEs and start ups as previously secured is required.

Affordable housing: The applicant has proposed to increase the quantum of affordable housing from 35.6% by habitable room to 50.8%, with 61% provided as social rent and the remaining 39% provided as intermediate. Confirmation that the offer would comprise genuinely affordable products is required.

Urban design, heritage and strategic views: The Council should confirm whether the proposed development meets the local definition of a tall building and if it does further information to address the impacts of the tall building is required. No harm is caused to heritage assets and strategic views.

Other issues on **transport** and **environment** also require resolution prior to the Mayor's decision making stage.

Recommendation

That Camden Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 69 of this report. Possible remedies set out in this report could address these deficiencies.

Context

1. On 10 August 2021 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following category of the Schedule to the Order 2008:
 - 1C(c) "the building is more than 30 metres high and outside the City of London."
 - 1B(c) "outside Central London and with a total floorspace of more than 15,000 square metres."
3. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

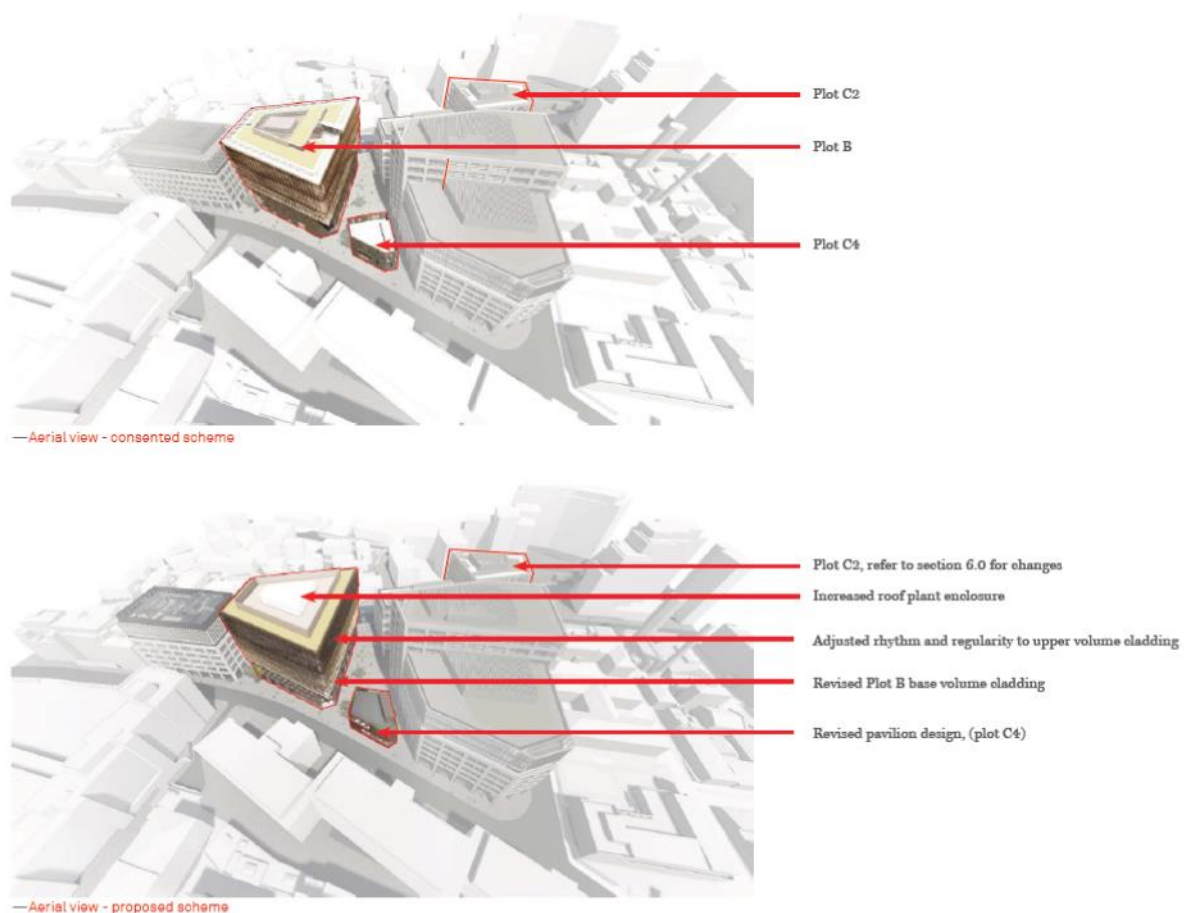
Site description

5. The site comprises a large triangular shaped 4 storey building located on St Pancras Way in Camden. The site is bounded by Regents Canal to the east, Granary Street to the south, and 6 St Pancras Way to the north. The building is currently in use as offices and a data centre.
6. The wider site, including 6 St Pancras Way was the subject of an application for the redevelopment of the site (see case history for further details) which was granted in March 2020. 6 St Pancras Way has since been demolished.
7. There are no listed buildings on site, however the site is within the Regents Canal Conservation Area. There are several Grade II listed buildings on Royal College Street to the west of the site. Regents Canal is a designated Site of Importance for Nature Conservation (SINC) as well as designated open space. The site just falls within the wider consultation setting LVMF view from Parliament Hill to St Paul's Cathedral.
8. The closest part of the TLRN is Camden Road (A503) approximately 325 metres north at the top of St Pancras Way A5202. The site is 600 metres north of the nearest entrance to St. Pancras International train station and Mornington Crescent underground station is 650 metres to the east. The PTAL rating of the site varies between 6a and 6b, which is excellent.

Details of this proposal

9. Changes are sought to the original permission for the redevelopment of the site (LPA Ref. 2017/5497/P and GLA Ref. GLA/4115/02) in the form of a drop in application. The application proposals relate to two of the buildings originally consented on the site, on Plots B and C4 (as shown on Figure 1 below). Changes are also proposed to the affordable housing mix on Plot C2.

Figure 1: Proposed and consented schemes:



10. A nine-storey building is proposed on Plot B, plus two basement levels, which is proposed as flexible Class E and B8 Use at sub-basement level, flexible Class E and Sui Generis Use at basement and ground floor level, and Class E on upper levels. This building was previously intended to provide a hotel as part of the original permission. On Plot C4, the two-storey pavilion building, has undergone a more fundamental redesign. Changes are also proposed to the external treatment of these buildings including a small increase in the size of the plant enclosure to the building on Plot B.
11. Table 1 below provides a comparison schedule of the land uses and floor areas proposed compared to the previous scheme:

Table 1: Floorspace schedule

Use Class	GIA
Plot B 2017	
Office (Use Class B1 now E)	14,512 sq.m.
Hotel (Use Class C1)	4,823 sq.m.
Plot B 2021 application	
Office (Use Class E)	16,751 sq.m.
Flexible Class E/Storage (Use Class B8)	1,864 sq.m.
Flexible Class E/Sui Generis/Storage (Use Class B8)	549 sq.m.
Flexible Class E/Sui Generis	532 sq.m.
Pavilion (Plot C4) 2017	
Flexible Retail/Bar (Use Class A1-A4)	794 sq.m.
Pavilion (Plot C4) 2021 application	
Flexible Retail/Bar (Use Class E/Sui Generis)	794 sq.m.

12. The floor area of Plot C4 would be unchanged, however, the area of Plot B would increase by 341 sq.m.

Case history

13. There are two applications of relevance to the proposals. On 17 March 2020 planning permission was granted for the redevelopment of the site including the 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 business floorspace (Use Class B1), 73 residential units (C3) (10 x studio, 29 x 1 bed, 27 x 2 bed 7 x 3 bed), hotel (C1), gym (D2), flexible retail (A1 - A4) and storage space (B8) development with associated landscaping work (LPA Ref. 19/5497/P and GLA Ref. GLA/4115/02).
14. This application seeks to make amendments to the previously approved Plots B and C. A separate application seeking amendments to plot A were submitted in March 2021 (LPA Ref. 21/1239/P). The changes sought relate to landscaping and small scale, physical alterations to the buildings. This application was not referred to the Mayor by the Council and is currently pending determination.

Strategic planning issues and relevant policies and guidance

15. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan (July 2017) and the London Plan 2021.
16. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance; and
 - The Affordable Housing and Viability SPG.
17. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good Growth - London Plan;
 - Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;
 - Industrial land - London Plan;
 - Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Good Quality Homes for All Londoners draft LPG;
 - Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
 - Office / Hotel - London Plan;
 - Urban design - London Plan; Character and Context SPG; Public London Charter draft LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG;
 - Strategic views - London Plan, London View Management Framework SPG;
 - Heritage - London Plan; World Heritage Sites SPG;
 - Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG;
 - Sustainable development - London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; London Environment Strategy;
 - Transport and parking - London Plan; the Mayor's Transport Strategy;

- Waterways - London Plan.

Land use principles

18. The proposals involve changing the previously approved use of the building on Plot B from offices (previously Use Class B1) and hotel (Use Class C1) to offices (Use Class E), and flexible Use Class E, storage (Use Class B8) and bar (sui generis) uses.

Offices

19. The quantum of office floorspace to be delivered is proposed to increase by a minimum of 2,239 sq.m. as a result of the proposals. The provision of additional office floorspace is fully supported in line with London Plan Policy E1, noting its location adjacent to the CAZ. Given that this space is designed for office use the applicant should consider whether its use can be further specified as Use Class E(g). The replacement of the permitted hotel use with office space on this site does not raise any strategic concerns with respect to London Plan Policy E10.
20. The applicant has also proposed to increase the provision of affordable workspace by almost 50%, increasing from 1,858 sq.m. in the consented scheme to 2,787 sq.m. This is fully supported in line with London Policy E3, though confirmation is required that the affordable workspace would be offered under the same terms as the original consent. Confirmation is required that this workspace would be suitable for SMEs and start ups as secured under the original consent. This should be captured as appropriate in the s106 agreement.

Retail and bar use

21. The proposals involve the provision of flexible Class E uses at ground and basement. It is understood that a large proportion of floorspace at ground is likely to be for retail use (approximately 1,877 sq.m.). This would be in addition to the retail floorspace already consented at Plot A under the original planning permission (5,585 sq.m.). The development of town centre uses is normally to be directed to town centres in the first instance in line with Policy SD7. A retail impact assessment was prepared in support of the retail offer in association with the original application for redevelopment. At the time, it was accepted that the proposals would not have a detrimental impact on the viability of Camden town centre.
22. Whilst some time has elapsed since this application was granted, it is acknowledged that the hotel is proposed to be replaced with a combination of office and retail/ storage uses which are considered more appropriate uses given the character of the wider area and distance from the town centre. However, given the time that has elapsed since the original consent and the intervening changes to the retail market, officers question whether the retail impact assessment can continue to be relied upon. The applicant should

provide further information to demonstrate that the proposals would continue to avoid detrimental impacts on Camden town centre.

23. Noting that the new use Class E includes a wide range of uses from offices to retail, leisure, and health related uses, and given the out of centre location of the site, it is strongly advised that the Council impose a condition to restrict the maximum quantum of retail floorspace.
24. It is understood that the Sui Generis use sought relates to bar use only. Again, due to the fact that this is an out of centre location and that this use could give rise to amenity issues, given the proximity to residential, the maximum quantum of bar use permissible within the development should be restricted by condition.

Storage

25. The proposals would involve an element of storage (Use Class B8) use within the flexible component of the development, most likely to be provided at basement level within Plot B. This would complement the storage floorspace already approved on Plot A and would contribute to the variety of stock available for business activities in line with London Plan Policy E1.
26. Appropriate mitigation measures should be secured to ensure that there is no conflict between the storage uses and other uses on the site and to ensure that the storage uses are not compromised in terms of their efficient function, access, service arrangements and operational times in line with London Plan Policy E7 part D.
27. Though provision of this use is described in the Planning Statement, it is not mentioned in the description of development and this should be clarified.

Housing

28. London Plan Policy H4 of the London Plan seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50% affordable housing. Policy H5 of the London Plan identifies a minimum threshold of 35% (by habitable room) affordable housing with a higher threshold of 50% for industrial sites where the scheme would result in a net loss of industrial capacity.
29. Applications providing the relevant threshold level of affordable housing before public subsidy; with an appropriate tenure split; having explored potential additionality through grant funding; and, meeting all other relevant policy requirements and obligations to the satisfaction of the Mayor and local planning authority can follow the Fast Track Route whereby the applicant would not be required to submit a viability assessment or be subject to a late stage viability review. The preferred tenure mix is outlined in Policy H6 of the London Plan as at least 30% low cost rent (social rent or London Affordable Rent), at least 30% intermediate (London Living Rent or shared ownership), and the remaining 40% to be determined by the local planning authority. There is a general expectation

that the remaining 40% would be predominantly a low-cost rent product. The consented and proposed housing mix is as follows:

Table 1: Previously consented mix:

	Studio	1 bed	2 bed	3 bed	Total units	Total hab. rooms	% by hab. room
Private	10	22	20	0	52	114	64.4%
London Affordable Rent	0	0	3	7	10	37	35.6%
Intermediate	0	7	4	0	11	26	
Totals	10	29	27	7	73	177	100%

Table 2: Proposed mix:

	Studio	1 bed	2 bed	3 bed	Total units	Total hab. rooms	% by hab. room
Private	7	19	14	0	40	87	49.2%
Low-cost rent	0	0	9	7	16	55	50.8%
Intermediate	3	10	4	0	17	35	
Totals	10	29	27	7	73	177	100%

30. As shown in the above two tables, the affordable housing offer has increased from 35.6% by habitable room to 50.8%, with a 61% provided as social rent and the remaining 39% provided as intermediate. This increase in affordable housing provision has been sought in line with Camden's Local Plan Policy H4, which seeks to negotiate the maximum reasonable amount of affordable housing with an affordable housing target of 50% being applied to developments with capacity for 25 or more additional dwellings. The proposed increase in affordable housing is supported and is eligible to follow the Fast Track Route.
31. In relation to affordability, the low-cost rent element was previously secured as London Affordable Rent and the intermediate at rent levels according to Camden Council's intermediate rent policy. Confirmation is required that the low-cost rented element would be secured at social rent or London Affordable Rents as before and that the intermediate rents would be provided at genuinely affordable levels.
32. In this regard, all intermediate rent products should be secured as affordable to a range of incomes below the upper limit of £60,000 per annum and benchmarked against the monitoring figure in the London Plan Annual Monitoring Report. In addition, annual housing costs (including service charges, rent and any interest payment) should be no greater than 40% of net household income. Further confirmation on how a range of income thresholds would be secured must be submitted. All affordable housing (including tenure split and affordability) should be agreed with Camden Council and robustly secured in

perpetuity within a Section 106 agreement. An early stage review mechanism must be secured.

Urban design

33. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
34. The proposed changes to the original scheme design in respect of Plots B and C4 are relatively minor and therefore raise no strategic concerns.

Tall buildings

35. London Plan Policy D9 is clear that tall buildings should only be developed in locations identified as potentially suitable in development plans. Policy D9 further states that Development Plans' definition for a tall building should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Notwithstanding a site's potential for the location of a tall building, its visual, functional, environmental and cumulative impacts must be assessed in line with Policy D9.
36. Paragraph 7.35 of the Camden Local Plan defines tall buildings as those "which are substantially taller than their neighbours or which significantly change the skyline". The buildings are similar in scale to surrounding tall buildings, though would be nearby to lower-rise existing development. The Council should confirm if the proposed development is considered to meet the local definition of tall buildings to allow officers to confirm whether the proposal should be assessed against the requirements of London Plan Policy D9.
37. It is noted that Camden Local Plan Policy D1 states that "all of Camden is considered sensitive to tall buildings". As such, should the proposal meet the local definition of a tall building then it would be considered inappropriate in this location and in conflict with London Plan Policy D9 part B. The applicant must also demonstrate that the visual, functional, environmental and cumulative impacts of the tall building have been addressed in accordance with Policy D9 Part C. This will then be considered in the balance alongside material considerations including the extant consent and the public benefits of the proposal.

Fire safety

38. In line with Policy D12 of the London Plan a fire statement has been produced, prepared by a suitably qualified third party assessor. The document sets out how each of the requirements of London Policy D12 have been addressed and nothing further is required. Compliance with the fire statement should be secured by condition.

39. Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings. The applicant should confirm that this can be achieved and must subsequently be secured via condition.

Heritage

40. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to conservation areas, for all planning decisions “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In relation to listed buildings, all planning decisions should ‘should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.
41. Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. In line with case law, any harm identified must be given considerable importance and weight.
42. Paragraph 194 of the NPPF further specifies that in determining applications, local planning authorities should require an applicant to describe the significance of any affected heritage assets, including any contribution made by their setting.
43. The site is within the Regent’s Canal Conservation Area (CA) and adjacent to the King’s Cross/ St. Pancras CA. Any development could therefore potentially have an impact on the character and settings of the CAs, as well as several listed buildings close to the site and in the wider area.
44. It is noted that Camden Council’s Regent’s Canal CA Appraisal and Management Strategy (2008) identifies the existing building as being a negative contributor to the character and appearance of the conservation area. The ability of any proposals to improve upon the existing condition and become a positive contributor to the character of the CA is therefore an important consideration.
45. A townscape and visual impact assessment has been submitted which provides images of the proposed development, alongside the proposed physical changes sought to Plot A under a separate application. The proposals involve a very minor change to the height of Plot B beyond that which was previously approved as well as refinements to the architecture of both buildings. As was previously concluded, the proposals would have a positive impact on the character and appearance of Regent’s Canal CA, by removing a building which was a negative contributor and replacing it with buildings of higher quality architecture of a scale and massing more in keeping with the character of the

conservation area. Furthermore, the proposals would continue improve the setting of the nearby King's Cross/St. Pancras CAs and there would be no harm to the heritage significance of nearby listed structures, the listed landscape of St Pancras Gardens or non-designated heritage assets nearby. As such the development would be in accordance with Policy HC1 of the London Plan.

Strategic views

46. London Plan Policies HC3 and HC4 set out policy on London's designated views, panoramas and river prospects as identified in the London View Management Framework (LVMF) SPG (2012).
47. London Plan Policy HC4 states that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views.
48. The site falls within the Wider Setting Consultation Area of the Protected Vista London Panorama 2A.2 from Parliament Hill to St Paul's Cathedral.
49. The part of the proposed development that falls within the Wider Setting Consultation Area would be entirely obscured by intervening development. As such the development proposal would not harm the characteristics and composition of this Strategic View or its landmark elements and would not affect the viewers' ability to recognise and appreciate the Strategically Important Landmark of St Paul's Cathedral. The remainder of the development would not otherwise detract from the overall composition of this view. As such, the proposed development accords with London Plan Policies HC3 and HC4.

Transport

Transport assessment

50. Provided that the package of mitigation measures secured for the original permission are also secured as part of this permission, as detailed below, then the strategic transport impacts of the application are relatively minor. However, the new proposal to completely remove 27 existing on-site car parking spaces is supported, in full compliance with London Plan Policy T6.2.
51. The proposed development will not have an unacceptable impact on London's strategic walking, cycling, public transport and highway networks due to its trip generation, in accordance with London Plan Policies T3 and T4.

Public realm

52. All new public realm proposed within the site must remain clear, unobstructed and fully accessible to the public at all times. Pedestrian and cyclists must be able to freely access all public areas, and this should be secured by condition

or in the S106 agreement in line with London Plan Policy D8 and the Public London Charter draft LPG. Cyclists should not be instructed or encouraged to dismount by any signage or other public realm design features.

Cycle parking

53. Fully London Plan compliant long stay cycle parking is proposed in accordance with Policy T5 part A. The short stay cycle parking is below London Plan minimum requirements for the new land use mix but, considering the removal of car parking, on balance this is acceptable. 34 showers and lockers and changing facilities are also proposed to serve the long stay cycle parking which is supported.

S106 obligations

54. Previously secured Section 106 (S106) contributions for transport should be retained. These included £32,000 to Legible London, £1,000,000 for a new pedestrian bridge across the canal to Camley Street, £1,500,000 for cycling and walking improvements on Pratt Street, St Pancras Way, Granary Street and Camley Street, and £92,000 for a Section 278 (S278) agreement with the Council which will enable cycling and footway improvements on local highway immediately adjacent to the site.
55. These contributions will ensure the development connects well to local walking and cycling networks in line with London Plan Policies T2 (Healthy Streets) and D8 (Public realm).
56. Except for any Blue Badge holders, all occupiers of and regular visitors to the proposed development should be prevented from applying for local parking permits by a S106 obligation.

Construction, deliveries and servicing

57. Construction Logistics, Delivery and Servicing and Travel Plans should also be secured through the S106 agreement with funding for Council monitoring.

Sustainable development

Energy strategy

58. The applicant has submitted an energy strategy; however, additional information should be submitted in accordance with the detailed technical comments that have been sent to the applicant and the Council under separate cover.
59. In summary, it is noted that the following further information is required: the potential for and future-proofing for district heating; maximising photovoltaic panels; and on air source heat pumps.

60. The applicant should also review the Be seen energy monitoring guidance to ensure that it is fully aware of the relevant requirements to comply with 'be seen' policy. The Council should secure these monitoring requirements via a S106.

Whole life-cycle carbon

61. Under London Plan Policy SI2, the applicant is required to submit a Whole Life-Cycle Carbon (WLC) assessment. However, no such assessment has been submitted. All applicants are expected to submit a completed WLC assessment template (as an Excel document, not a PDF) and follow the GLA WLC guidance; both of which are available here: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/whole-life-cycle-carbon-assessments-guidance-consultation-draft>. Further advice on what is expected has been provided to the Council and applicant under separate cover.
62. The Council should secure via condition the submission of a post-construction assessment to report on the development's actual WLC emissions.

Circular economy

63. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process. A Circular Economy Statement has not been submitted. The applicant is required to submit a Circular Economy Statement in accordance Policy SI7 and the Circular Economy Statements draft LPG.

Environmental issues

Urban greening

64. London Plan Policies G1 and G5 embed urban greening as a fundamental aspect of site and building design. Features such as street trees, green roofs, green walls, rain gardens, and hedgerows should all be considered for inclusion and the opportunity for ground level urban greening should be maximised. The applicant must calculate the Urban Greening Factor as set out in London Plan Policy G5 and seek to achieve the specified target of 0.3. An accompanying landscaping plan should also be provided.

Sustainable drainage and flood risk

65. London Plan Policies SI12 and SI13 set out how developments should manage and mitigate flood risk and incorporate sustainable drainage systems as an integral part of their design in accordance with the drainage hierarchy. London Plan Policy SI5 sets out measures for developments to restrict water use. Detailed flood risk, drainage and water comments are provided under a separate cover.

Local planning authority's position

66. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

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

Financial considerations

68. There are no financial considerations at this stage.

Conclusion

69. London Plan policies on offices, retail, industrial uses, affordable housing, urban design, heritage, strategic views, transport and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land Use Principles:** The development is supported in land use terms subject to the Council restricting the maximum quantum of floorspace permissible in relation to both retail and bar uses, noting the site's out of centre location. The proposed increase in the quantum of affordable workspace to be provided is strongly supported, confirmation that this floorspace would be suitable for SMEs and start ups as previously secured is requested.
- **Affordable housing:** The applicant has proposed to increase the quantum of affordable housing from 35.6% by habitable room to 50.8%, with 61% provided as social rent and the remaining 39% provided as intermediate. Confirmation that the offer would comprise genuinely affordable products is required.
- **Urban design, heritage and strategic views:** The Council should confirm whether the proposed development meets the local definition of a tall

building and, if it does further information to address the impacts of the tall building is required. No harm is caused to heritage assets and strategic views.

- **Transport:** The proposed development generally accords with strategic transport policies, subject to securing conditions and retaining existing obligations.
- **Sustainable development:** Further information on energy, urban greening and drainage is required. The applicant must submit a whole-life cycle carbon assessment and a circular economy statement.

For further information, contact GLA Planning Unit (Development Management Team):

Hannah Thomas, Principal Strategic Planner (case officer)

email: hannah.thomas@london.gov.uk

Reece Harris, Team Leader – Development Management

email: reece.harris@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

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