

<b>Address:</b>	The Ugly Brown Building 2 - 6 St Pancras Way London NW1 0TB		<b>1</b>
<b>Application Number(s):</b>	2021/2671/P	<b>Officer:</b> Jennifer Walsh	
<b>Ward:</b>	St Pancras & Somers Town		
<b>Date Received:</b>	01/06/2021		
<b>Proposal: Demolition of existing building, and redevelopment to provide a nine-storey building with two basement levels for flexible Class E and Sui Generis Use, a two-storey Pavilion for flexible Class E and Drinking Establishment (Sui Generis Use), along with associated cycle parking, servicing, hard and soft landscaping, public realm, and other ancillary works</b>			
<b>Background Papers, Supporting Documents and Drawing Numbers:</b>  Site Location Plan; 1603_P_001 Rev H; 1603_P_098 Rev J; 1603_P_099 Rev P; 1603_P_100 Rev Q; 1603_P_100; 1603_P_101 Rev M; 1603_P_102 Rev L; 1603_P_103 Rev L; 1603_P_104 Rev K; 1603_P_105 Rev M; 1603_P_106 Rev M; 1603_P_107 Rev L; 1603_P_108 Rev P; 1603_P_RP Rev K; 1603_P_131 Rev E; 1603_P_132 Rev E; 1603_P_231 Rev F; 1603_P_240 Rev H; 1603_P_302 Rev F; 1603_P_304 Rev F; 1603_P_321 Rev J; 1603_P_322 Rev J; 1603_P_323 Rev J; 1603_P_324 Rev K; 1603_P_350 Rev J; 1603_P_451 Rev D; 1603_P_457 Rev A; 1603_P_458 Rev A; 1603_P_459 Rev A; 1603_P_460 Rev A; 1603(SC)001 Rev P; Planning Statement May 2021; Flood Risk Assessment and SUDS Strategy Rev C 2018; BREEAM Assessment P01 December 2020; Fire Strategy Plot B dated May 2021; Energy Statement P01 Dated April 2021; Basement Impact Assessment Version F Dated 11th May 2021; Transport Assessment Addendum Dated May 2021; Retaining Wall Assessment dated 19th May 2020; Arboricultural Impact Assessment dated March 2018; Townscape, Visual and Built Heritage Assessment Addendum dated May 2021; Health Impact Assessment April 2021; Regeneration Statement dated April 2021; Air Quality Assessment May 2021; Outline Construction Management Plan May 2021; Noise Assessment Report May 2021; Daylight and Sunlight Addendum Dated April 2021; Wind Microclimate Statement of Conformity dated April 2021;			
<b>RECOMMENDATION SUMMARY: Grant conditional planning permission subject to Section 106 Legal Agreement and referral to Mayor of London for his direction</b>			
<b>Applicant:</b>		<b>Agent:</b>	
Reef Estates Limited C/O 2 St Pancras Way London NW1 0TB		DP9 Ltd 100 Pall Mall London SW1Y 5NQ	

## ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	B1 Business - Office		26,192
Proposed	Flexible Class E (a,b,c,e,f,g) Drinking Establishment (Sui Generis) and B8		1,591
	Class E (a,b,c,e,f,g) Drinking Establishment (Sui Generis)		4,311
	Residential C3		7,561
	Class E/ (g) Workspace		47,286
	Class E (d) (Gym)		1,601
	Flexible Class E (g) workspace/B8 Use		1,864
	Storage B8		6,011
	<b>TOTAL</b>		<b>70,225</b>

Previously Approved 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
<b>TOTAL - All</b>	<b>Flats</b>	<b>40</b>	<b>27</b>	<b>7</b>	<b>73</b>

Proposed Residential Use Details:					
	Residential Type	No. of Bedrooms per Unit			
		Studio/1	2	3	Total
Market	Flat	26	14	0	40
Intermediate Rent	Flat	13	4	0	17
Social Rent	Flat	0	9	7	16
<b>TOTAL - All</b>	<b>Flats</b>	<b>39</b>	<b>27</b>	<b>7</b>	<b>73</b>

Parking Details:		
	Parking Spaces (Previously Approved)	Parking Spaces Proposed in this application
Existing	52	0
Proposed	27	0

## **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 Economy, Regeneration and Investment 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)**

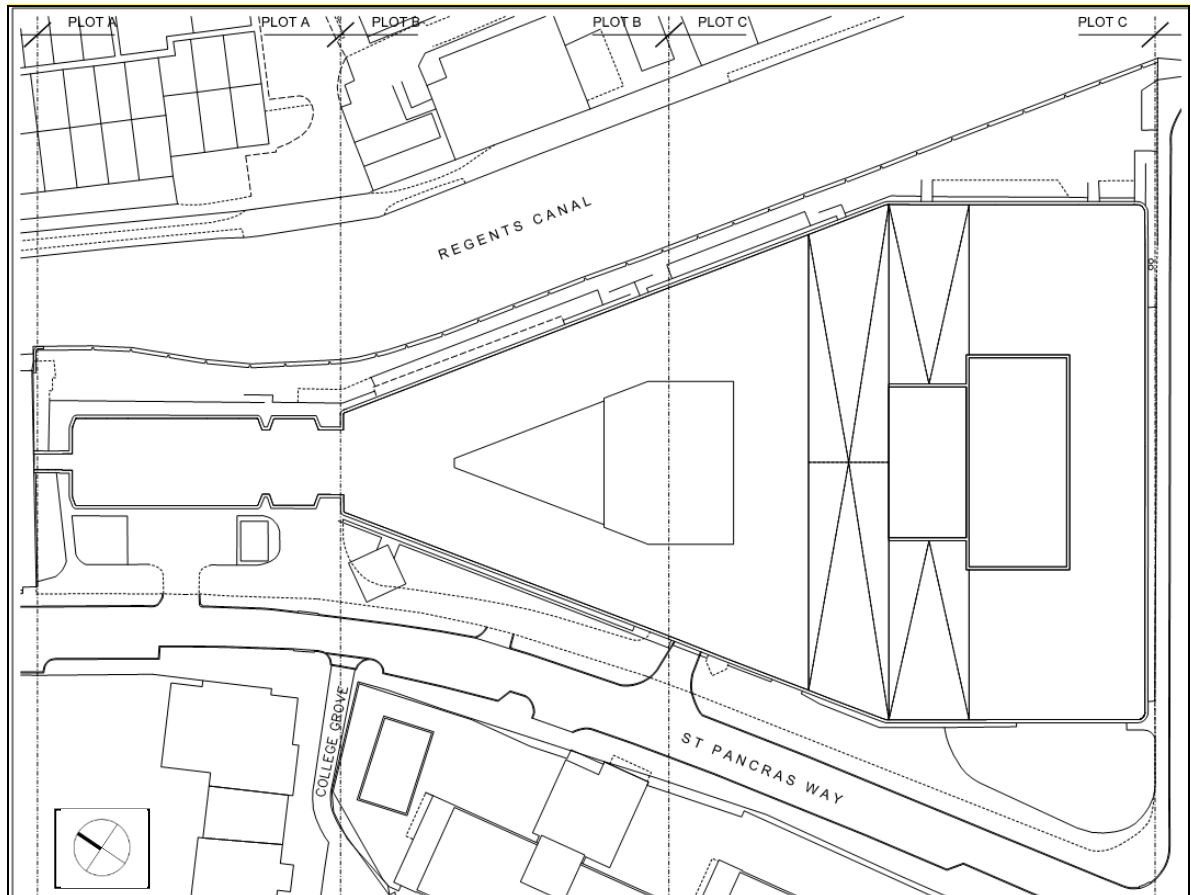
A screening opinion for the proposal was provided by the Council in February 2017 whereby that development did not constitute an EIA development under the EIA Regulations 2011/2015 Regulations). An EIA is therefore not applicable to the development.

## **1 Executive Summary**

- 1.1 Planning Permission for redevelopment of the Ugly Brown Building was approved in 2020, the scheme had 3 phases and works have already commenced on site for the development of Plot A. This application relates solely to plots B and C.
- 1.2 The application although it is a fresh application is largely a resubmission of the planning permission granted in 2020, but seeks amendments to that scheme as the applicant considers that the previously approved hotel (which was to be in Plot b) no longer represents the optimum use of this site. There has also been a change in ownership which means Ted Baker will no longer be retained as occupiers of the proposed building of Plot B. Within the proposed Plot B building, the previously approved Hotel element is being replaced with Office accommodation. Subsequent design changes are also proposed to Plot B and Plot C4 and an uplift of affordable housing and affordable workspace has been secured.
- 1.3 The previous permission is a material planning consideration in the determination of this scheme. Whilst there have been changes to the planning policy framework since that decision (adoption of the London Plan 2021 and an update to the NPPF, as well as an update to Camden Planning Guidance) most policies remain the same as under the determination of the previous 2020 permission, the exception to this are changes in relation to the energy and sustainability policies of the London Plan and planning guidance issued in support of the Camden Local Plan 2017, of particular relevant are the changes to the Energy Efficiency and adaptation which have been picked up by the application where applicable as well as the Housing CPG to reflect arrangements for Social Rented housing and London Affordable Rent arising from the Mayor's new Affordable Housing Programme on 24<sup>th</sup> November 2020.
- 1.4 Overall, the proposed amendments which replace the hotel with employment space are considered to be acceptable and the wider mixed use development is well considered, offering an improvement and uplift in the affordable housing and affordable workspace offer which is welcomed. The design changes are considered to enhance the previous application and preserve and enhance the Regents Canal and adjoining conservation areas. It is therefore recommended for approval subject to conditions, Section 106 and referral to the Mayor.

## 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**

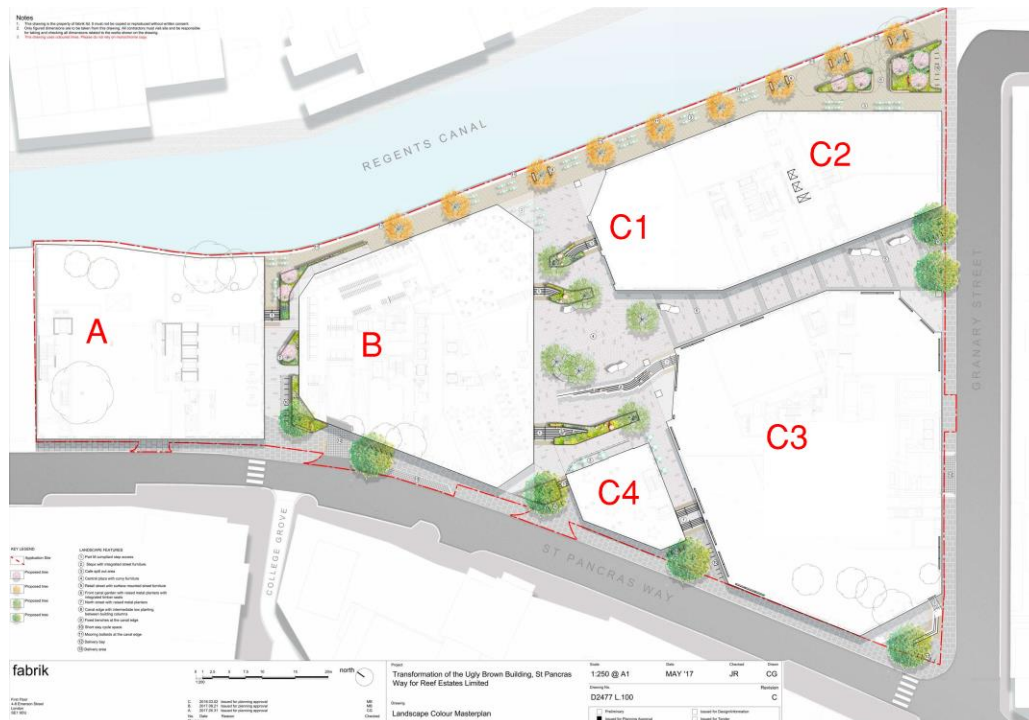
- 2.2 The site comprises three buildings, collectively known as the Ugly Brown Building, built originally as a Royal Mail facility it was later converted into other uses in 2000 and is currently under three freehold plots, referred to within the application as Plots A, B and C.
- 2.3 Existing buildings 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 on the northern part of the site has now been demolished and ground works have commenced on site in accordance with the permission granted in 2020 (see section 4.1). Plot B, was previously occupied by Ted Baker PLC and was 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 Knowledge Quarter which identifies that this area should continue to promote a world-class cluster of scientific and knowledge-based institutions and companies that specialise in areas like life sciences, data and technology and the creative industries.
- 2.6 The south east corner of the site lies within the Wider Setting Consultation of the Parliament Hill to St Paul's London Panorama from assessment point 2A.1 (the summit of Parliament Hill). It is not located within the Protected vista itself.
- 2.7 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**

#### **Previous Application**

- 3.1 Planning permission was recommended for approval by Planning Committee in 2018 and Full Planning Permission following the completion of the S106 was granted in March 2020 for the following works: *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 was to 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 previously proposed site demonstrating building names**

## The Proposal

- 3.3 This application seeks design and use class changes to Plots B and C. Revisions are proposed to remove the hotel accommodation in Plot B and replace it with flexible commercial office space as well as associated design changes to the facade. Design changes are also proposed to Plot C4 and internal changes to Plot C to increase the amount of affordable housing.
- 3.4 Therefore, the applicant is proposing a full planning application for plots B and C to incorporate changes to the previously approved scheme in respect to the following amendments:
- Changing the hotel to flexible commercial space comprising 47,286 sqm of new office floorspace, Class E/Drinking Establishment (Sui Generis) / B8 5,902sqm and ancillary storage 6,011sqm, along with design revisions to Plot B;
  - Increased Basement size and depth to Plot B to cover the whole floorplate;
  - Removal of car parking to Plot B and reconfiguration of servicing;
  - Design revisions to Plot C4;
  - Amendments to the affordable housing provision on Plot C2 to increase the provision to 50.8% (habitable room);
  - Increase of affordable workspace by 50% to 2,787sqm; and
  - Minor amendments to the sustainability proposal to remove CHP and gas boilers and replace them with an all-electric solution to combine Air Source Heat Pumps and PV Panels.

The land uses and heights for each building are outlined below:

#### Building B

- 3.5 A nine storey building, providing flexible Class E (g) (Office workspace) to all levels and Sui Generis Use (drinking establishment) at basement and ground floor levels. The roof plan enclosure has also been increased in size to allow additional plant for the inclusion of flexible lab enabled office space.
- 3.6 Building B previously included a basement level car park which has been removed. The basement level to Building B has been increased in size to match that of the above ground floorplate. Flexible Office/ storage space is proposed for Basement level 2 and 330 Cycle spaces and changing facilities as well servicing requirements and office/storage accommodation is proposed at Basement Level 1.

#### Building C1

- 3.7 At 7 storeys in height, no changes are proposed to this building.

#### Building C2

- 3.8 A 12 storey building that would provide 73 residential units at first to 12<sup>th</sup> floor with two flexible retail units at ground floor level.
- 3.9 Of the 73 residential units, changes are proposed to the affordable housing numbers. A full spreadsheet is quantum. No changes are proposed to the overall figure of 73 units, however, 40 of these would be private market units (7 x studio/19 x 1 bed and 14 x 2 bed) and 33 (up from 21) would be affordable; 16 Social rent (9 x 2 bed, 7 x 3 bed) and 17 Intermediate Rent (3 x studios, 10x 1 bed and 4 x 2bed). The mix % by Habitable room is proposed to be 50.8% affordable and 49.2% private. The mix of the provision follows the same as the extant permission and primarily as does the internal layout of the building, . There are no external changes to this building.

#### Building C3

- 3.10 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. No changes are proposed internally nor externally to this building.

#### Building C4

- 3.11 The pavilion building would provide a standalone building to be used as Class E/ Drinking Establishment (Sui Generis) use which would include a terrace at roof level.



- 3.12 Design changes are proposed to this building to match the base volume of plot B. Corner windows and metal frames are proposed at the upper level.
- 3.13 Proposed minor changes to the landscaping in between Plots B and C are included within this application, specifically around Plot C4 and Plot B to accommodate and blend with the design changes proposed to the building.

#### Phasing

- 3.14 The proposed development would come forward in 3 phases, the draft proposal is for the following timeframes:
- *(Phase 1 – Plot A construction has begun);*
  - Phase 2 – Plot B to be constructed 2023-2025;
  - Phase 3 – Plot C to be constructed 2023-2026.

#### Basement

- 3.15 The basement is included in the proposed changes and this is due to an increase in the proposed basement depth under Plot B. There will now be a second basement under plot B as there was previously approved under Plot C. A revised Basement Impact Assessment has been submitted and reviewed by Campbell Reith.

#### Landscaping

- 3.16 The development maintains the previously proposed landscaping strategy for a comprehensive landscaping proposal across the site. The application includes design changes to the following areas:
- The central plaza, to reconfigure the planting and cycle stands and the addition of an additional tree as well as an enhanced entrance from St Pancras Road;
  - Repositioning of the tree planting along the canal;
  - North Street, located between buildings A and B, has proposed changes to the planter and the steps to address the level changes, introduction of a new planter, relocation of an existing street tree and alterations to the layout of the access points from Plot B; and
  - The street frontage along St Pancras Way would match the hard landscaping within the site and include street trees and cycle stands.
- 3.17 The principles and detail of the consented scheme landscape design are to be retained and amended only where the building footprint, servicing or access points differ. Therefore, 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 28 trees, one more than was previously approved.

#### Car and cycle provision

- 3.18 The development would no longer include the provision of 27 car parking spaces within the basement of Building B, for sole use of the existing occupier Ted Baker. These have been removed and the space repurposed for the cycle parking, servicing and plant room as set out above. Changes to the proposed servicing arrangements are included and proposed as part of this application.
- 3.19 In line with London Plan 2021 requirements, the proposed development will include 330 long stay cycle parking spaces with changing facilities at Basement level.

## **4 RELEVANT HISTORY**

#### The site

- 4.1 **2017/5497/P:** 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 business floorspace (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.  
**APPROVED 17/03/2020**

#### **Adjacent sites**

- 4.2 **St Pancras Hospital, 4 St Pancras Way, London, NW1 0PE:**

Planning Permission (Ref. 2020/4825/P) was recommended for approval subject to s.106 legal agreement for the: Partial redevelopment of the site, involving the demolition of seven existing buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen and the Post Room & Former Mortuary) and construction of a part seven, part ten storey (plus roof plant) purpose-built eyecare, medical research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity.

New building to comprise a mixture of clinical, research and education purposes, including eye care accident and emergency department, outpatients, operating theatres, research areas, education space, cafe and retail areas, admin space and plant space.

Associated site re-landscaping works including formation of patient drop off area to St Pancras Way, new public realm and routes through the site, cycle parking and servicing ramp and cross over to Granary Street. The application has a resolution to grant from Planning Committee from 30th June 2021 and planning permission will be granted if and when the S106 agreement is completed.

#### **4.3 101 Camley Street, London NW1 0PF:**

Planning permission (ref. 2014/4385/P and subsequent MMA - 2018/3682/P) was granted subject to s106 legal agreement for the: 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. This permission is being implemented and is nearing completion, at the time of writing.

#### **4.4 Unite Students accommodation / Travis Perkins, 11-13 St Pancras Way London NW1 0PT:**

Planning permission (ref. 2011/1586/P) was granted subject to s106 legal agreement for the: Erection of part 6, 7, 8 and 10 storey building comprising 3,877 sqm 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. This development has been fully built out.

### **5 CONSULTATION**

5.1 The initial consultation period ran from 03/06/2021 until 04/07/2021.

5.2 Six Site notices were displayed around the site ( 3 Along St Pancras Way, 1 on Granary Street and 2 on the Canal (either side) from 10<sup>th</sup> June – 4<sup>th</sup> July and a press notice was published on 3<sup>rd</sup> June 2021 in the Camden New Journal. No consultation responses were received from any residents.

5.3 Consultation responses have been summarised below. They are presented in the following order:

- **Statutory**
- **Local Groups/Stakeholders**
- **Design Review Chairs Review Panel**

#### **Statutory**

#### **5.4 Greater London Authority – Stage 1 Response**

This response was provided following the revisions to the application.

- 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.
- 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.

- 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.
- Further questions were raised in relation to energy, urban greening and drainage. These have been dealt with via communication between the applicant and the GLA.
- The GLA required a whole life cycle carbon assessment and a circular economy statement, however it has subsequently been recommended that a condition is recommended to accompany any planning permission to ensure these documents are submitted and approved prior to construction.

#### **Officer Comment**

- *Full discussion of these points are set out within the main body of the assessment, but officers feel that the revisions and clarifications especially in relation to sustainability provided by the applicants during the course of the assessment as well as the conditions proposed by the GLA are now sufficient to adequately close out the above and allow for a positive determination. Due to the planning history and the recent approvals in this area, Officers do not consider that this application meets the local definition of a tall building (i.e. those which are substantially taller than their neighbours and/or which significantly change the skyline). Should a resolution to grant be made in line with officer recommendations, this will be sent through to the Mayor as part of their stage 2 review prior to a final determination as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.*

### **5.5 Transport for London**

- The car free nature of this proposal and the use of space to facilitate sustainable travel is strongly welcomed by TfL.
- At least 5% of the total provision should be able to accommodate larger cycles and all spaces should be designed and laid out in accordance with the London Cycling Design Standards (LCDS).
- Long stay cycle parking will be accessed via a dedicated cycle lift and stairs featuring a cycle channel. The applicant should confirm that the lifts will be LCDS compliant by providing a 1.2m by 2.3m as a minimum with a minimum door opening of 1.0m. The applicant should also consider overall lift capacity, and demonstrate that at time of peak demand, the lifts can move enough people without significant delay.
- The route to the long stay cycle parking appears to require cyclists to pass through several doors, this should be amended. LCDS recommends that users should have to navigate a maximum of two doors to gain access to the cycle parking areas. If the design cannot be altered, then push-button controls to assist with door openings or double doors opening in both directions should be provided.
- All external doors giving access to cycle parking and all internal corridors should at least be 2m wide.

- Short stay cycle spaces shall be in the public realm, and the applicant is reminded that they should be located close to the associated building entrances
- Subject to the above being followed, the proposals as it stands would not result in an unacceptable impact to the strategic transport network.

## 5.6 Thames Water

- Recommend a condition to respond to Foul Water concerns from the development.
- They would like further information in respect to existing Surface Water and have recommended a condition is added due to network reinforcements being likely to be required
- A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer.
- As required by Building regulations part H paragraph 2.36, Thames Water requests that the applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions.
- The proposed development is located within 15 metres of a strategic sewer. A piling method statement should be agreed in consultation with Thames Water.
- Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal.

*Officers Response: Officers are aware that considerable discussions have taken place between the applicant and Thames Water due to the commencement of works on Plot A. The proposed conditions from Thames Water are recommended to be added to the decision notice.*

## 5.7 Canal & River Trust

### Design

- As part of the proposed change in use of Plot B from hotel to 'flexible workplace', the revisions to the ground-floor treatment of this building have removed the previously proposed significant section of floor-to-ceiling glazing, which would seem to reduce the extent of the buildings interaction with the canalside. We consider that this is a missed opportunity for the development to make the most of the canalside, and provide positive animation for towpath users etc. We would be pleased to see this elevation amended to provide more canalside animation.

### Impact on structural integrity of the canal

- The amended proposals will potentially affect the structural integrity of the waterway wall, and the assessments undertaken to date may need to be revisited. We have therefore requested a condition for a waterway wall survey and schedule of repairs, and that the previous permission conditions with regard to the waterway wall be repeated, outlined below.

#### Conditions

- Two conditions are requested by the Trust to supplement conditions 43, 44 and 45 which were attached to the original permission (2017/5497/P). These relate to Landscaping and Waterway Wall survey.

*Officers Response: In relation to the design point, this is discussed within section 10 where the design and the interaction with the canal is discussed. The relevant conditions are recommended in addition to those included within the previous application.*

### **5.8 Historic England (GLAAS)**

- Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, it is concluded that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.
- The proposed application site is not located within an archaeological priority area, however is located close to the line of the ancient Fleet River and is adjacent to the Regent's Canal and medieval settlement of St Pancras. The site is first thought to have been developed in the 19th Century with the construction of the Granary. This was replaced in the 1980s with the current building. The archaeological desk based assessment provided with the application demonstrates that the construction of the Granary building involved excavating to a depth of 6m beneath canal level and the construction of a concrete raft directly on top of the natural London Clay. This would have removed any potential archaeological remains on the site. Furthermore construction of the current building involved the removal of the 19th Century deposits, including the concrete slab, before laying the existing foundations. Therefore remains of the 19th Century Granary building are not thought to survive on the site. There are not thought to be any archaeological remains surviving on the site and therefore the proposed development will not have an archaeological impact.
- No further assessment or conditions are therefore necessary.

#### **Design Review Panel – Chairs Review**

5.9 The proposals were presented to a Camden Chair's Review Meeting in December 2020, a summary of the comments are provided below:

- The panel considers the changes made to the designs of Plot B and Plot C4 since the previous review meeting have had a positive effect.
- The fin material to the upper levels must be carefully chosen to avoid a corporate effect.
- The panel considered that an increased volume of plant on the roof can be accommodated, subject to being set well back from parapet enclosed in light materials and tested in long views.

- The designs for Plot C4 are a significant improvement, creating a contrast with neighbouring buildings. A single material and distinctive structural strategy could be considered to produce a more unified appearance and further differentiate it from its neighbour. The building could be opened up further to the east to activate and engage with the public realm.
- More work is required to ensure the landscape strategy is detailed, creative and coherent, providing a high quality public space that will be easily navigable and will attract the people needed to generate activity.

*Officers Response:*

*Officers are satisfied that the changes that have been made sufficiently address the comments and suggestions of the DRP. Further consideration is set out in the design section of the report.*

## **6 POLICIES & GUIDANCE**

### **6.1 National Planning Policy Framework 2021 (NPPF)**

### **6.2 National Planning Practice Guidance (NPPG)**

### **6.3 The London Plan 2021**

### **6.4 Mayor's Supplementary Planning Guidance**

### **6.5 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
- A5 Basements
- 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

## **6.6 Supplementary Planning Guidance**

Access for All (2019)  
 Air Quality (2021)  
 Basements (2021)  
 Biodiversity CPG (2018)  
 Design (2021)  
 Developer Contributions (2019)  
 Employment sites and business premises (2021)  
 Housing (2021)  
 Planning for health and wellbeing (2021)  
 Public open space (2021)  
 Town centres and retail (2021)  
 Trees (2019)  
 Water and Flooding (2019)

## **6.7 Other documents**

- Kings Cross / St Pancras Conservation Area Statement (2003)
- Regent's Canal Conservation Area Statement (2008)
- Camden Housing Delivery Test Action Plan (2020)
- Camden Climate Action Plan 2020
- Camley Street to Canal Side SPD (2021)

## **6.8 Emerging policy and guidance of relevance**

- Camley Street Neighbourhood Plan (2021)
- Draft Site Allocations Plan (Consultation draft 2020)



## ASSESSMENT

The site has an extant permission and this is a revised full planning application to account primarily for the proposed removal of the hotel and creation of additional office space. The assessment therefore concentrates on the differences between the approved and proposed scheme and considers where relevant new policy. The principal considerations material to the determination of this application are considered in the following sections of this report:

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

<b>27.0</b>	<b>Planning obligations</b>
<b>28.0</b>	<b>Conclusion</b>
<b>29.0</b>	<b>Recommendations</b>
<b>30.0</b>	<b>Conditions</b>

## 7 LAND USE

7.1 As approved the site has the following floorspace figures (including Plot A, Plot B and Plot C):

<b>Previously Proposed Use (Use Class)</b>	<b>Floorspace in sqm (GIA)</b>
Office (B1)	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
Gym (D2)	1,601
Hotel (C1)	4,823
Storage (B8)	6,011
<b>Total</b>	<b>80,347</b>

**Table 2: Areas of approved land uses**

The proposed floorspace figures (for Plot B and C) are as follows:

Floorspace	Use Class	Floorspace in Sqm (GIA)
<b>Plot B</b>		
Office	Class E	16,751
Flexible	Class E/Drinking Establishment/B8	549
Flexible	Class E/Drinking Establishment	532
Flexible	Class E workspace/ B8	1,864
<b>Total</b>		<b>19,695</b>
<b>Plot C4</b>		
Flexible	Class E/Sui Generis	793
<b>Total</b>		<b>793</b>
<b>Wider Plot C (All GIAs as consented under 2017/5497/P)</b>		
Office	Class E	30,535
Leisure	Class E	1,601
	Class E/Sui Generis/B8	1,042
	Class E/Sui Generis	2,986
	Class C3	7,561
	Class B8	6,011
<b>Total</b>		<b>49,736</b>
<b>Total Plot B and C</b>		<b>70,225</b>

Table 3: Proposed areas

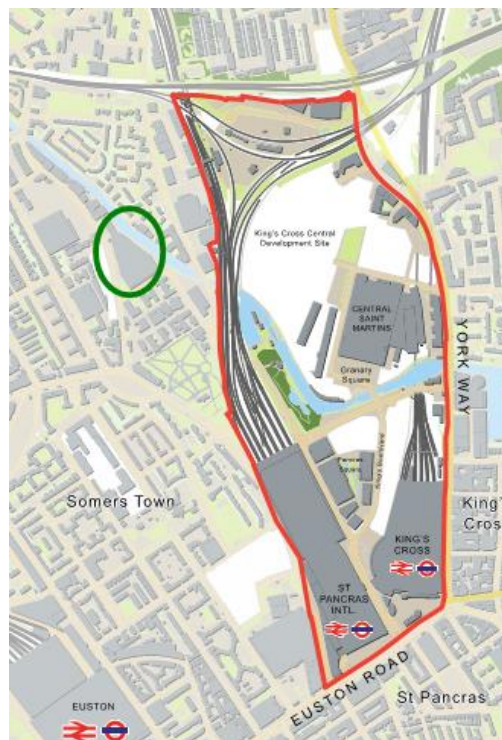
7.2 The principle changes are :

- Change of use of 4,823sqm of hotel to Office workspace on levels 1-9;
- Amendments to the flexibility of the ground and lower ground floor flexible uses due to introduction of Class E
- Increase of Basement floorspace (additional Level) for flexible workspace and storage of 1,864sqm
- Increase of 12 residential units from private to affordable no additional floorspace.

7.3 The main changes considered as part of this application in floorspace terms relate to change of use of 4,823sqm of hotel accommodation to Class E office workspace on levels 1-9. There is also an uplift in class E and B8 primarily through the provision of a larger basement under Plot B.

7.4 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.

- 7.5 The site is located within the Knowledge Quarter which identifies that this area should continue to promote a world-class cluster of scientific and knowledge-based institutions and companies that specialise in areas like life sciences, data and technology and the creative industries. The changes to Plot B have been primarily driven through the desire to provide Lab-enabled office space on the 1-9 floor levels. Changes are proposed to the servicing strategy and the provision of a larger plant room to accommodate this use of the space.
- 7.6 The proposed uplift of 4,283sqm of office space due to the removal of the hotel floorspace is considered acceptable in policy terms. In the context of the extant permission this amount of office floorspace only relates to a minor change to the nature of the commercial offer rather than any significant increase and it is considered that the scheme has been well designed to accommodate these changes.



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

#### Flexible Commercial Use Class E/B8

- 7.7 Since the application was approved, the Use Class Order has been amended and three new use classes were introduced. Specifically for this application Use Class E has brought together existing classes A1 (shops) A2 (financial and professional services), A3 (restaurants and cafes) and B1 (business) as well as parts of classes D1 (non-residential institutions) and D2 (assembly and leisure) into one single use class to allow for changes of use without the need of planning permission. This new class allows for a mix of uses to reflect changing retail and business models. For this application, this creates greater flexibility for the uses at ground floor level predominantly.

- 7.8 For the previous application, a Retail Impact Assessment (RIA) was submitted. This assessment used 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.
- 7.9 This application seeks additional retail space within Plot B, yet due to the sizes proposed, it is not considered to harm the vitality nor viability of the neighbouring local areas, including Somers Town and Camden Town. The units are proposed to be a mix of large and small units which create vitality not just to the development itself but also to the wider area.
- 7.10 The GLA have stated that they would like to see a revised and updated RIA support of the application. There are minimal changes to the proposal over and above what is controlled under the introduction of Class E. There is a requirement secured by S106 for the applicant to submit a retail strategy which is sought to be secured via this application as well.
- 7.11 The previous ground floor space had an element of flexibility between retail and restaurant uses. This application seeks very similar uses and Officers recommend imposing similar conditions to ensure that the percentage of each use is controlled. Therefore, it is recommended that a maximum of 40% of the ground and basement floors are occupied as cafés and restaurants. A minimum of 10% shall be occupied in retail, financial services or day nursery uses and a maximum of 30% of the ground floor uses shall be in Drinking Establishment use at any one time.
- 7.12 Similar to the previous permission it is also recommended to condition that there shall be a minimum of 2 small units (200sqm 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 for Plot B and C 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 Class E (g) Workspace

- 7.13 As existing the site accommodates 26,190sqm (GIA), the development is proposing to increase this to 47,286 for plot B and C which is an uplift of 4,823sqm (GIA) on the previous application. This was the floorspace figure of the hotel space which has been removed from the current application. The proposed scheme seeks to use the space as flexible Office space with the potential of using it as lab enabled office space.
- 7.14 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.

- 7.15 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 previously negotiated the provision of 1,858sqm of affordable workspace which would be marketed at 50% of market value and retained for 50 years. Due to the uplift in office floorspace the proposed development also proposes to increase the provision of affordable workspace by 50%, increasing the figure to 2,787sqm set on the same terms as previously secured. This provision is sought to ensure the aspirations of Policy E2 are achieved. This 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.
- 7.16 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'. To ensure the affordable workspace operates efficiently and is appealing for a workspace provider all of the affordable workspace should be provided within the same building. As with the previous application, the Affordable Workspace will be provided within Plots B and C and will be secured via a S106 agreement.
- 7.17 The development would bring a mix of large and small existing and new businesses to the Borough which would contribute towards sustainable economic growth and the Knowledge Quarter uses which would be in accordance with the aspirations of policies E1 and E2 and emerging policy in the draft site allocations document, which is supported.

#### Residential (C3)

- 7.18 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. The change from hotel to offices does not trigger a requirement under the mixed-use policy for additional housing and the scheme therefore does not provide any change to the residential floorspace previously approved. The previous permission secured 73 residential units with 21 of these units being affordable housing. This application seeks permission for 73 residential units but with 33 of those units being affordable. Full details of affordable housing will be assessed in full below. As previously approved, all the residential units would be located within building C1 which is located to the southern part of the site along the canal frontage. No external or layout alterations are proposed to this building with only the tenure of the units changing.

#### Storage (B8)

- 7.19 An additional basement level is proposed under Plot B. This would be located at the same level as the Basement Level 2 already approved under Plot C but with

no connection to it. The space is proposed as Flexible Class E and B8 Storage use. There are no external manifestations. The principle of storage and flexible Class E use at this level is considered acceptable.

#### Phasing

- 7.20 As noted within the previous application, 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 small amount of open space, 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 2026.
- 7.21 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, it was accepted previously that this was not possible in due to the current lease on Plot C. The applicant has confirmed that they are now expecting it to come forward earlier in their programme than expected, this is as a result of bringing this application forward, the occupation dates are now to be only a year apart with Phase 2 seeking occupation in August 2025 and Phase 3 seeking occupation in June 2026.
- 7.22 Within the previous application, to mitigate against the delay in delivery, officers sought to seek a package of measures to mitigate the phasing and delivery delays. Officers sought the following contributions which were secured via a Section 106 legal agreement:
- £1 million 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;
  - Provision of charity office floorspace of 176sqm 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.
- 7.23 The financial contributions in association to the previous permission have already been paid and received by that Council and the commitments from the applicant will be secured, updated where appropriate and linked via section 106 legal agreement, irrespective of the fact that the delay in delivery has been reduced.

#### Conclusion; land use principles

- 7.24 In light of the above and having regard to the extant permission, 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.

### **8 Tenure and unit size mix of the proposed housing**

#### Policy review

- 8.1 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 H4, H5, H6, H7 and Housing CPG are relevant with regards to new housing, including to tenure and unit size.

#### Mix of unit sizes

- 8.2 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.



8.3 The approved and proposed unit mix across the whole site is tabulated below:

<b>Approved Mix</b>					
	1-bedroom (or studio)	2- bedroom	3- bedroom	Total	% by habitable room
Social- affordable rented	0	3	7	10	35.6%
Intermediate	7	4	0	11	
Market	32	20	0	52	64.4%
Total	40	27	7	73	

<b>Proposed Mix</b>					
Social Rent	0	9	7	16	50.8%
Intermediate Rent	13	4	0	17	
Market	26	14		40	49.2%
Total	39	27	7	73	

**Table 4: Mix of approved and proposed residential units**

8.4 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 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. The private housing mix proposes 26 x 1 beds and 14 x 2 bed units. As the proposed market housing mix of 1 and 2 beds was established within the extant permission, alongside the mix of affordable units, the proposed numbers are considered acceptable.

#### Assessment of proposed tenure mix

8.5 London Plan policy H4, Camden Local Plan policy H4 and the Housing CPG, 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.

8.6 We would generally look to achieve the usual policy compliant 60/40 split between Social Affordable Rent and Intermediate Rent across the scheme. In this case the proposed tenure mix on the consented scheme was slightly weighted towards intermediate tenure when calculated by units, but in line with policy when calculated by habitable room, a similar approach is taken with the proposed scheme and taking account of that earlier decision therefore, in this instance it is acceptable.

8.7 Intermediate Rent is the preferred intermediate tenure for the Council. This is based on information contained in the Intermediate Housing Strategy, which targets a majority of rents within this tenure at those on incomes of £31,950 – £42,600 pa. In this revised proposal a good number of the 2 bed, 4 person

intermediate rent flats have 2 x bathrooms, and could therefore be suitable for families, or sharers, which is welcomed.

- 8.8 As shown in the tables above, the affordable housing offer has increased from 35.6% by habitable room to 50.8% with 61% provided as social rent and the remaining 39% provided as intermediate rent. This increase in affordable housing provision has been sought in line with Camden's Local Plan Policy H4 which seeks to secure an affordable housing target of 50% being applied to developments with capacity for 25 or more additional dwellings. Therefore, as the proposals are now meeting the policy requirement of 50% no viability assessment is required.
- 8.9 The affordable units would be located to the south western side of building C2 with the social rented units and intermediate units located on all floors up to the 10<sup>th</sup> floor.
- 8.10 As with the previous application the proposed tenure split is secured through Section 106 agreement with an early stage review mechanism added in.
- 8.11 The intermediate rent, in line with the GLA stage 1 report are to be secured as affordable to a range of incomes below the upper limit of £60,000 per annum and benchmarked again the monitoring figure in the London Plan Annual Monitoring Report.
- 8.12 Confirmation has been provided by the applicant that the same split will remain within the proposed as to the approved application.

#### Wheelchair housing

- 8.13 The proposal provides a policy compliant 10% wheelchair housing, comprising 3 x wheelchair units as follows: 1 x fully 2-bed 4 person fully accessible wheelchair unit located on the 1<sup>st</sup> floor level in the social affordable rent element of the scheme which is welcomed. The remaining 2 x 1-bed 2 person, wheelchair adaptable units, are located in the intermediate rent element of the scheme, located on the 8th and 9th floors respectively.

## **9 AMENITY OF PROPOSED HOUSING**

### Policy review

- 9.1 Camden Local Plan policy H6 is 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.
- 9.2 The amenity policy principles have already been established by the extant permission. In relation to Plot B and C, whilst minor amendments are proposed to the roof enclosure to Plot B, there are no additional amendments included within this application. An updated letter to the previously approved Daylight and Sunlight Analysis has been produced by the applicant in support of the application.

### Design and layout

- 9.3 There are no internal nor external changes proposed to the scheme since it was approved in 2020 for this residential plot. Therefore, the proposed residential units have been designed to a high standard. The units have been set out to be 'tenure blind' externally 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 No amendments are proposed to the units in any way, only the tenure has been flipped as discussed in the previous statement. It is desirable for Affordable housing units to be located in a separate core from the private units. As with the previous application, this is not proposed but the developers have been discussing a separate entrance for the affordable housing which is considered acceptable and welcomed.
- 9.5 All of the proposed units meet Camden's floorspace standards both in terms of overall size and bedroom size.
- 9.6 As was previously concluded in the 2020 approval, the design and layout has been well considered and whilst some units would experience lower levels of daylight, an assessment of this deficiency has been balanced against the planning benefits of the proposal. It is considered that when taking the benefits of the development into consideration and given the fact that each unit which falls below the standards suggested by 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.

## **10 DESIGN AND CONSERVATION**

- 10.1 The extant permission acts as a significant material planning consideration. Therefore, the principle of demolition, layout of the proposed development and height, bulk and mass have already been established. This application and report therefore, solely concentrates on the proposed changes to Plot B and Plot C4.
- 10.2 The design and conservation considerations are follows:
- Statutory Framework and Implications
  - Designations
  - Height, bulk and mass
  - Detailed design of Plot B and C4
  - Conclusion

### Statutory Framework and Implications

- 10.3 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.

10.4 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.

#### Designations

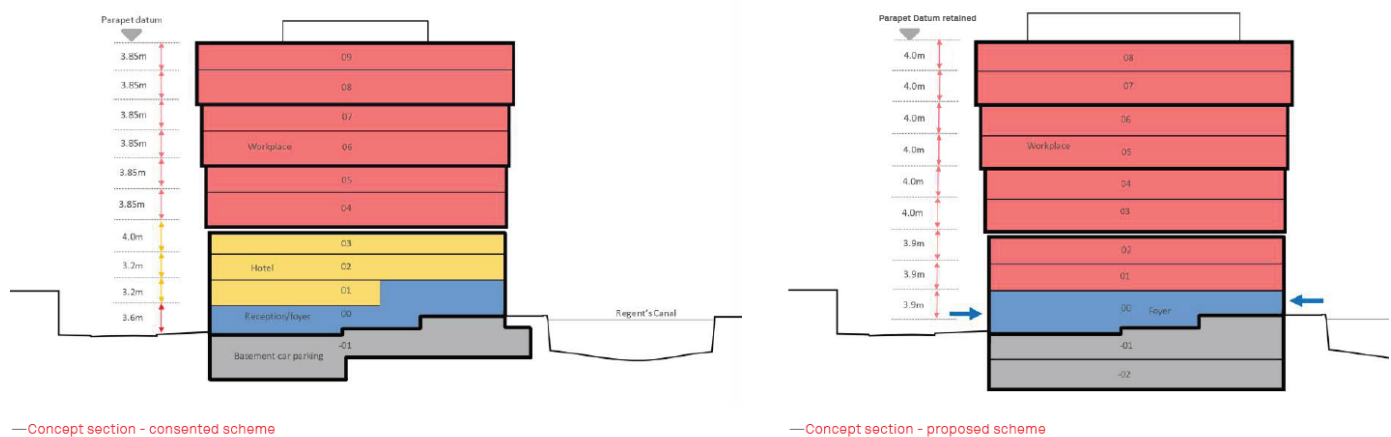
10.5 The site is located within the Regents Canal Conservation Area. It does not include any listed buildings nor are there any listed buildings within close proximity to the site. The existing buildings on site are noted within the Conservation Area Management Statement as making a negative contribution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

#### Height, bulk and Mass

10.8 As previously stated, the height, bulk and mass of this proposal have already been established under the previously approved planning application 2017/5497/P. In relation to Plot B, the massing also, broadly, follows the massing of the consented scheme with a defined base to the building with 6 upper storeys arranged in double storey volumes of increasing projecting floorplates creating an outwardly stepping profile.



**Figure 4 – Consented and proposed massing schemes**

10.9 The most significant change in the massing is considered to be the increased size of the proposed roof top plan enclosure. Due to the change of the use for this building, further plant is required and therefore the roof enclosure is increased in size.

10.10 Verified views have been submitted with shows a view south along the canal, from Elm Village, above the towpath. The plant enclosure is of limited visibility in the proposed view and whilst larger, due to the height of the main building and the wider context of the other plots, it is not considered detrimental to the character and appearance of the conservation area or the building itself.

### Detailed Design and Appearance – Plot B

10.11 The most pronounced changes to the building are around its detailed design. Following early proposals to create a 'lighter' base with more glazing, officer's directed the applicants to maintain the 'heavier' appearance of the consented scheme on the premise that the previously consented dark brick work and over-all mass of the base was considered to work well in relation to the character of the canal and, also, the character of other buildings on the site built, predominantly, in brick.

10.12 It is proposed to use a similar dark brick as originally consented. The previously asymmetrical arrangement of windows is changed to a more regular pattern of punched window openings. It is also proposed to create a more regular pattern of ground floor openings along the canal frontage, which is considered to be beneficial in terms of creating a more active frontage. The Canal and Rivers Trust have raised concern of lack of these changes in relation to reducing the extent of the buildings interaction with the canalside (see figure 5). Whilst the floor to ceiling windows did aid the interaction on the eastern corner, it was restricted to just that corner due to the use of the ground floor. Within this application, the façade has bigger openings to the whole corner and therefore, it is considered that there will be more opportunities to see through the buildings from the square offering up views of the canal. Of particular note is the increase in the size of the entrance opening to the central square. Here the effect of the increase in the amount of glazing is offset by the depth of the set

back to the glazing wall and also the deep curved reveals to corners and brick columns which create a sense of mass to the building base.

- 10.13 The sense of mass and solidity of the base is also expressed at the corners with glazed openings to the third floor. The effect of these deep walls is to create a monolithic warehouse-like presence on the canal.
- 10.14 Within the Design and Access Statement details are included which shows other aspects of brick detailing at the base and on the window surrounds which add a degree of visual richness along with other elements, such as the profiled metal work to the spandrels in the glazed opening pictured above at the different floor levels.
- 10.15 Proposed changes to the upper floors involve an increase in the regularity of the vertical metal fins creating a more pronounced rhythm across the surface. Materially the metal fins are similar to the consented scheme with anodised aluminium fins. However, it is proposed that each stepped volume is clad in a lighter to darker tonal range of a buff colour on the lower volume, a brown tone on the middle volume and bronze tone on the upper volume. The effect of this is to provide a clearer expression of each of the building volumes and an appreciation of the distinct form of the building. Details of the proposed fins are recommended to be secured via condition to ensure the look and feel of the proposed material is acceptable.



**Figure 5 – Consented (left) and proposed (right) façade changes fronting Regents Canal**

10.16 Within the Chairs Report from the Design Review Panel, it was noted that the panel considered the changes made to the designs of Plot B and C4 since the previous review meeting have had a positive effect. The building now has its own distinct architectural personality and presence.

#### Pavilion- Building C4

10.17 In the consented scheme the pavilion building was conceived as an outcropping of Building B, built in a similar dark brick and architectural language of window openings and details. The currently proposed building is designed as a distinct building with its own character whilst at the same time referencing its canal side context. The building is predominantly clad in bronze anodised aluminium with a serrated profile on a brick base also with a serrated profile, in reference to corrugated sheet piling along the canal edge.

10.18 A large window opening on the ground floor on the St Pancras Way frontage allows glimpses through the building to the central square inviting movement into the space, animating this section of St Pancras Way. Further design changes are proposed which allow this building to 'open up' and spill out into the Square and wider public realm. The proposed building has also been effectively reduced by one storey height allowing more sunlight into the central space.

10.19 The Design Review Panel considered the design changes have resulted in a much-improved pavilion design. The contrasting materials, increased size of openings facing the street and the reduced height are of great improvement.

10.20 In conclusion, the proposed changes to the consented Buildings B and C4 are considered to maintain the high design quality of the consented scheme and provide a positive contribution to the local canal side context. The proposed changes are well considered and offers further opportunity to align 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 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 There are limited changes to the previously approved layout which previously secured routes through the site which currently aren't available. The landscaping is only proposed to be altered where the building footprint, servicing or access points differ. The site has been designed 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 proposed changes include amendments and improvements to the space between Plot A and Plot B to create a more sympathetic proposal which enhances the route for cyclists and pedestrians. The proposal seeks to slightly reconfigure the tree planting along the canal frontage to reduce the formality of the previous proposal which is welcomed and between Plot B, the pavilion and the square a simplification in the design is sought to encourage and enable informal seating and gathering within the space.
- 11.4 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.
- 11.5 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.

### Trees

- 11.6 There are currently 30 trees on the site. There are no changes to tree removal or replacement trees within this proposal. 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:



<b>Tree grade</b>	<b>BS5837:2012 definition</b>	<b>No. of trees</b>
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
	<b>TOTAL</b>	<b>30</b>

**Table 6: Existing trees on site**

- 11.7 All 30 of these trees would be removed under the previous proposals and this application. 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.
- 11.8 27 replacement trees are included within the extant permission. Within this application 28 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.
- 11.9 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.
- 11.10 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.

- 11.11 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

- 11.12 As with the previous application, the loss of the category A tree and category B group of trees was 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. The proposal to reconfigure the tree planting along the canal frontage to reduce formality is welcomed. Given the above and the previous planning history, 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 was previously submitted and the Council's Nature Conservation Officer has reviewed the amendments and has confirmed there are that the changes are insignificant with regard to ecology. He has requested that the same conditions are applied which have been recommended as part of the decision.

## **13 IMPACT ON NEIGHBOUR AMENITY**

- 13.1 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. Camden Planning Guidance 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.

- 13.2 There are no proposed changes to the height of the proposed buildings, however, there are slight changes proposed to the roof plant bulk and mass of plot B. This has been considered alongside the previous application and the additional bulk and mass of the proposals are not considered to harm the amenity of the neighbouring properties over and above the previous application.
- 13.3 Within this application, it is proposed to use the floorspace of Plot B as flexible commercial space which could accommodate lab enabled office space. As such, it is proposed to increase the size of the plant room at roof level to accommodate additional plant for potential lab tenants. At this stage in the design, specific details of the type, number and configuration of building services plant are not developed. Therefore, the noise report sets out suitable limits to which plant should adhere to and such limits have been set.
- 13.4 As stated, there will be an increase plant room with additional plant to that which was previously approved. The noise report has been assessed by the Council's Environmental Health officer who accepts the noise limits as set out within the Noise Report. The additional plant has been considered and a condition is recommended for the details of the plant to be submitted and approved to ensure that the noise limits are not exceeded in any way. 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 A condition was added to the previous permission which secured 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. A compliance condition is recommended to ensure that work is carried out in line with the previously approved report and suitable measures are in place in case any contamination is found.

## **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 revised development is proposing a two storey basement, known as B1 and B2 respectively. The proposed basement levels at the site varies from 13.4m to

18.00m AOD while the canal water level is at 23.13m AOD and canal bed is at average 21.15m AOD. Within this application plot B and C are proposed to have a double basement at 17.40m and 13.40m AOD. This is an increase on the previously approved scheme, with Plot B now proposing to have a double basement as well as Plot C.

- 15.3 The proposed B2 level under Plot B would provide a Flexible Class E/B8 use, sitting alongside the storage under Plot C. Level B1 under plot B previously sought to provide car parking, B1 space, refuse space and a plant room. This element of the scheme has been revised with the car parking being removed from the scheme completely. B1 under Plot B would provide; cycle space, showers, plant, substation, refuse facilities and a small element of Flexible Class E/B8 use.
- 15.4 The basement would not be expressed at ground floor level. The only openings would be via the two internal service bays, 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. Whilst both have been discharged under the previous application, these are both recommended to be added to the permission to take into account the changes to the depth of basement under Plot B which is being considered.

## **16 FIRE SAFETY**

- 16.1 Policy D12 (Fire safety) of the London Plan requires all major development proposals to be submitted with a Fire Statement. The application has been supported by a Fire Strategy Report for Plot B office accommodation which outlines the proposed fire safety arrangements for the development. The report has been prepared by authors with the relevant qualifications and experience.
- 16.2 The fire strategy for the non-residential areas is based on guidance in BS9999: 2017 Fire safety in the design, management and use of buildings – Code of practice.
- 16.3 The vertical escape routes for each floor is available via two protected stairways. Basement levels -01 and -02 are also served by a second independent stairway.

16.4 A Category L1 Automatic Fire Detection and Alarm system (AFDA) is proposed. The building will also be provided with a commercial sprinkler system to cover all accommodation which will be designed in accordance with BS EN 12845.

16.5 The design and coverage of the sprinkler system is to be developed further at the next stage of the design. Therefore, a Final Fire Strategy which outlines the final design to ensure the development is implemented in line with this fire strategy is proposed to be attached.

16.6 No Fire Strategy has been produced for Plot C the residential building, due to the phasing of the proposal as well as the detail of the design and therefore, a condition is recommended to require a further Fire Statement to be produced by an independent third party for Plot C, including the residential building. It would be required to detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision would be made within the site to enable fire appliances to gain access to the building. The submitted details would be assessed by the Council's Building Control department.

## **17 AIR QUALITY AND SUSTAINABLE DESIGN AND CONSTRUCTION**

17.1 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.

17.2 An Air Quality Assessment (AQA) has been submitted as part of this application. The report concludes the overall effect of the development on Air quality is considered to be insignificant.

17.3 Given the phasing of the proposed development with Plot C not due to come forward until around 2023, 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, similar to the previous application. 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.

17.4 In light of the above and due to the previous conditions and section 106 obligations secured, it is considered the development would be in accordance with CC4 of the Local Plan.

## Sustainable design and construction

### Policy review

- 17.5 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.
- 17.6 Since the 2020 permission, a new London Plan was adopted in 2021 which requires all new development to be net zero and 15% carbon reduction at Be lean stage.

### The Proposal

- 17.7 A new Energy Statement has been submitted in support of the application. Revisions to the overall scheme include the removal of the CHP from the approved application from 2020. The previous scheme proposed CHP and Gas boiler systems in two locations on the site, one to Plot A to serve plots A and B and the second to Plot C. This has been amended to an all electric strategy utilising Heat Pumps. Air Source Heat Pumps are considered to be the best suited renewable technology for this development. Roof mounted Photovoltaic (PV) panels are also proposed to available roof space with a PV array of approximately 130m2.
- 17.8 The energy statement demonstrates Be Lean, be Green Measures to achieve a total saving of 40% Co2 emissions compared to Part L2A 2014 compliance. Whilst this exceeds the minimum requirement it does not achieve zero carbon and therefore a carbon offset of £298.580 is required to be secured via S106 in line with the London Plan and Local Plan policy. This will be secured via Section 106 Agreement.
- 17.9 The proposal has been assessed under BREEAM UK New construction 2014 and is targeting an Excellent rating. However, due to the date of the proposed construction, the section 106 will be drafted to ensure that the proposals meet BREEAM UK New construction 2018 and achieve an Excellent rating as is proposed.
- 17.10 As with the previous application, there is no district heat network currently in the vicinity of the development, however, an onsite district energy network will be created to link all Plots within the development site.
- 17.11 As with the previous application, it is also necessary for the development to future proof its plant and pipework for later connection. 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.

- 17.12 As with the previous application, 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*

- 17.13 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*

- 17.14 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.

*Whole Life Carbon*

- 17.15 Under the London Plan Policy S12, the application is required to be accompanied by a Whole Life Carbon Assessment. This has been assessed by the GLA within their stage 1 report and recommend a condition to require the submission of a post construction assessment to report on the developments actual Whole Life Cycles emissions.

*Circular Economy*

- 17.16 Under the London Plan Policy S17, a Circular Economy Statement is required to be submitted in support of any application. The applicant has submitted a draft document and due to the application being a resubmission of a previously approved application, the GLA have accepted this and requested a condition is added to ensure that no development takes place until a detailed Circular Economy Statement and Operational Waste Management Strategy in the interest of sustainable waste management and in order to maximise the re-use of materials is submitted and approved.

## **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 The same flood risk assessment which was previously submitted has been resubmitted in support of this application. This document states that there is a very low risk of flooding. The Flood Risk Assessment provided for the proposed development generally complies with the London Plan policy SI.12
- 18.3 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 a combination biodiverse/blue roofs on all buildings wherever possible and draining 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 Camden Local Plan policy A1 are relevant with regards to microclimatic impacts.
- 19.2 The applicant has submitted a Statement of Conformity to the previously submitted document, predominantly to take account of the detailed design changes to Plot B. The report concludes that due to the design changes being minor, they do they are not expected to significantly alter the wind environment and therefore the outcomes of the wind assessment submitted in support of the previous application would still stand.
- 19.3 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.
- 19.4 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.

## **20 TRANSPORT**

### Policy review

- 20.1 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.



## 20.2 Proposed Changes

- The removal of the ramp to basement level servicing area to facilitate the provision of a larger at – grade servicing yard;
- Removal of the 27 on-site car parking spaces with the basement space being utilised for cycle parking;
- 330 cycle spaces are proposed at basement level within Plot B with showers, lockers and changing facilities all provided at this level;
- 55 Sheffield stands are to be provided within the public realm at ground floor level;
- A larger servicing yard at ground floor level within Plot B is now proposed to accommodate 2-3 servicing vehicles;
- Waste storage is to be provided at basement level; and
- Servicing and waste collection for Plot C remains unchanged.

### Trip Generation

20.3 As part of the Transport Assessment Addendum, the applicant has provided a trip generation methodology for the uplift in office space 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.

Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Underground	+50	-17	+33	-13	+44	+31
Rail	+37	-15	+22	-11	+32	+21
Bus	+17	-10	+8	-8	+14	+5
Taxi	-3	-9	-12	-8	-5	-14
Motorcycle	+2	0	+2	+1	+2	+2
Car Driver	0	0	0	0	0	0
Car Passenger	0	-1	-1	-1	0	0
Cycle	+11	+1	+11	+1	+11	+12
Walk	+10	-8	+4	-6	+8	+3
<b>Total</b>	<b>+124</b>	<b>-58</b>	<b>+64</b>	<b>-47</b>	<b>+104</b>	<b>+56</b>

**Table 8: Predicted Net change in Trips between consented and proposed Plot B.**

20.4 Using the information within Table 8, it is expected that the development will create an increase in trips during the peak hour of up to 64 additional total people's trips during the AM peak from that which was estimated for the previous

hotel use. 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. This is also supported by the analysis within the Transport Assessment Addendum where it states that “it is anticipated that bus and underground services will receive circa 1 additional passenger per service, with an addition of circa 3 passengers per rail services”. Therefore, in consideration of the previous application, it is considered that the change of use from hotel to office accommodation the proposals would have a limited impact on the public transport network, especially in light of the requirements from the previous application which would be carried over and sought.

- 20.5 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 was previously sought with the previous application 2017/5497/P with a contribution of £1,500,000 being secured and paid to the council. 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

#### Public Realm Improvements

- 20.6 There are limited changes to the public realm as previously approved. The design and access statement clearly outlines the spaces and the changes proposed which are considered to be minor in form. Where reconfigurations are proposed, they all seek to enhance the area of public realm and improve connectivity which is welcomed.

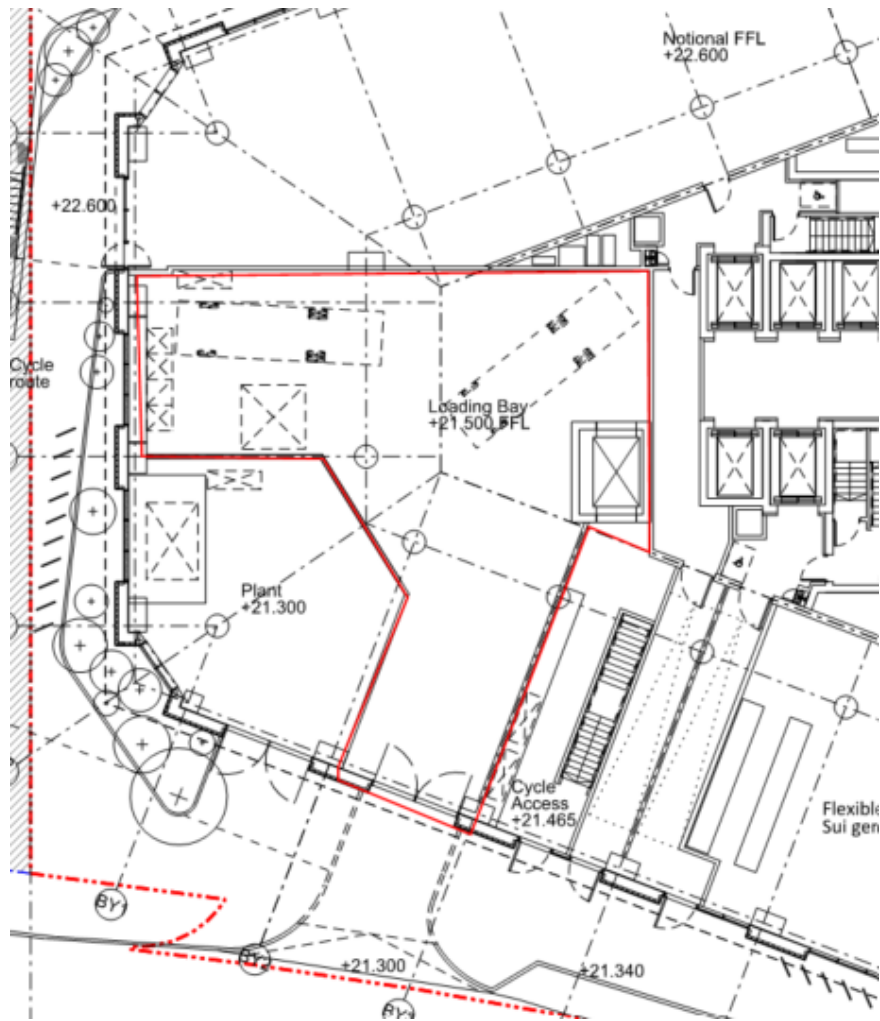
#### Car Parking

- 20.7 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.
- 20.8 This application proposes to remove the previously approved 27 car parking spaces and the basement space will be used for cycle parking. The car free nature (which will be secured via a section 106 legal agreement) and the use of space to facilitate sustainable travel is strongly welcomed by Camden and TFL.
- 20.9 Should planning permission be granted, it is recommended that a Section 106 legal agreement sections that all residential units and commercial units are car free and that the two disabled parking bays within Plot C are fully converted for electric charging.

#### Servicing

- 20.10 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 B will be undertaken predominantly from the improved servicing bay at ground floor level fronting Pancras Way, 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 as previously approved.

20.11 The proposed larger servicing bay for Plot B is considered to be an improvement on the previously approved submission and is welcomed.



**Figure 11: Location of servicing bay**

20.12 An additional requirement for a 10 T Rigid Gas Tanker vehicle forms part of this application to allow for the accommodation of lab enabled office space on the upper floors of Plot B. Further information has been provided which shows the swept path analysis for the truck to service the plant room within the sites boundary but on the public realm. The landscaping is considered to mitigate the harm and safety concerns but further detail would be required to be included within the Service and delivery Management Plan secured via section 106.

20.13 The revised servicing bay is in a similar position to that which was approved yet it allows a larger servicing space to be provided. It is not considered the change of use from hotel to office space would generate a significant increase in trips generated from the development. The previously approved Plot B scheme was estimated to generate circa 44 trips per day with a combined hotel and office use. The proposed office scheme is estimated to generate approx. 45 deliveries a day. Therefore it is considered that the revised scheme is sought to be an improvement on the previously approved scheme and would

not result in an unacceptable impact to the strategic and local transport network subject to the same Section 106 legal obligations being secured as were attached to the previous planning permission.

#### Cycle Parking

- 20.14 Policy T1 of the Local Plan requires developments to sufficiently provide for the needs of cyclists. The London Plan 2021 Policy T5 also provides guidance on minimum cycle parking standards. Fully London Plan compliant long stay cycle parking is proposed in accordance with Policy T5 part A. The short stay cycle parking of 110 cycle spaces as approved under the previous application 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 within the revised Plot B to serve the long stay cycle parking which is supported.

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

- 20.15 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 as with the previous application, 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.
- 20.16 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 plots 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. The CMP for Plot A has already been approved by the Council.
- 20.17 It is also recommended that a financial contribution of £25,000 for each CMP as well as a construction bond of £30,000 for each phase monitoring be secured as a section 106 planning obligation if planning permission is granted.

#### Further Section 106 obligations Improvements

- 20.18 When Officers considered the previous application, a number of Section 106 obligations were secured to ensure that the impact from the scheme is minimised and a number of schemes were identified 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 were 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. These are to be carried forward and secured via this application.

#### *Pratt Street pedestrian and Cycle improvements*

- 20.19 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 was previously sought to extend the scheme to cover the section of the street closest to the development.

#### *St Pancras Way Cycle redevelopment schemes*

- 20.20 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 was previously sought to mitigate the impact of the development on St Pancras way.

#### *Granary Street Improvements*

- 20.21 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 was previously sought to develop a scheme to mitigate the predicted issues on Granary Street.

#### *Camley Street environmental and urban design improvement*

- 20.22 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 towards the scheme was £250,000.
- 20.23 Whilst these figures were set against the previous application, it is not considered that the proposed changes would add to the capacity to that which was previously assessed. Therefore, this financial contribution which was considered and secured through the previous permission still stands. Due to the implementation of the previous permission and the development on site of

Plot A, this contribution has already been paid in full, under the S106 agreement attached to permission 2017/5497/P, so will not be required to be secured again under this permission.

#### Highway and Public Realm Improvements directly adjacent to the site

20.24 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’*.

20.25 As part of these works and the previously approved application, 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 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.

20.26 Given these works together with the detailed design of the location of the servicing bay have not changed since the previous permission, a contribution of £91,771.29 previously sought has been paid in full, under the S106 agreement attached to permission 2017/5497/P, so will not be required to be secured under this permission. This allows the proposal to comply with Policy A1.

20.27 Transport for London requested a contribution for four new Legible London signs to help with Way Finding for pedestrian and help to encourage people to access the site as well as find transport interchanges on foot. A contribution of £32,000 has been paid in full, under the S106 agreement attached to permission 2017/5497/P, so will not be required under this permission.

#### Excavation in close proximity to the public highway

20.28 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.

20.29 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.

20.30 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

- 20.31 In respect of transport related matters, it is considered that the proposed development would be acceptable subject to appropriate conditions and Section 106 obligations, both received to date and outstanding payments. The development would remove car parking to the previously approved scheme and improve the servicing arrangements to plot B, 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.

## **21 CANAL BRIDGE**

- 21.1 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.
- 21.2 The previous application secured a contribution of £1,000,000 which has been paid and 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. Pre application discussions are at an advanced stage for the bridge application and a full planning application for the bridge is expected to be submitted to the Council in December 2021.

## **22 SAFETY AND SECURITY**

- 22.1 Camden Local Plan policy C5 (safety and security) and CPG1 (Design) are relevant with regards to secure by design.
- 22.2 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.

## **23 REFUSE AND RECYCLING**

- 23.1 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.
- 23.2 Waste storage will continue to be located at basement level, with direct lift access provided to the ground floor servicing yard where bins can be made available within 10m of the consented loading bay onto St Pancras Way.

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

**23.4** 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 use.

## **24 HEALTH AND WELLBEING**

24.1 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 welling and reduce inequalities. Due to the changes proposed a revised Health Impact Assessment was not required as the considerations for the previous application still stand.

24.2 The HIA previously described 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 that the proposed amendments are to be in accordance with the objectives of Policy C1.

## **25 EMPLOYMENT AND TRAINING OPPORTUNITIES**

25.1 The previous planning permission was large enough to generate significant local economic benefits and this application is sought to build on this. 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. The application

25.2 The Council welcome the proposal references flexible floorplates which can be sub-divided to be suitable for co-working, cellular SME space and larger businesses.

25.3 The proposal includes an uplift of office floorspace of 4,823sqm (GIA). This is accompanied by an improved affordable workspace offer by 50%, increasing from 1,858sqm in the consented scheme to 2,787sqm which is welcomed.

25.4 In line with Employment Sites and Business Premises CPG, a range of training and employment benefits were previously secured and should be carried through to this application 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.



## 25.5 Construction Phase

- The applicant is required to work to a target of 20% local recruitment when recruiting for construction-related jobs as per Employment Sites and Business Premises CPG.
- 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 must recruit 1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Inclusive Economy team.
- The applicant must also sign up to the Camden Local Procurement Code.
- Pay London living wage (for end-use phase and construction) as a minimum salary for all employees across the development and include obligations for contractors on-site to pay a minimum of London Living Wage.
- 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.

25.6 The applicant should commit to a package of employment and training opportunities such as end use apprenticeship and work experience placements. Where the end use occupier is not known at application stage, the Council will seek an agreement to ensure that its aims and obligations in respect of employment and skills are transferred to the end use occupier/s as part of their subsequent lease negotiations. These should be secured via a S106 legal agreement and include:

- The applicant provide a rolling programme of apprenticeship recruitment, in line with policy E2 and Camden Planning Guidance, 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.

25.7 With regard to financial contributions, the Council will seek to negotiate section 106 contributions to be used by the Council's Inclusive Economy service to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden. A contribution was collected on the previous scheme. Therefore, based on the current information available a contribution is sought on the uplift of employment floorspace which was previously proposed to be in hotel use. That contributions would be calculated as follows:

- Uplift in employment floorspace(not including the flexible uses):  
 Net increase in employment floorspace from the hotel use is 4,823. sqm  
 GIA / 12sqm [space requirement per full time employee] = 402 full time jobs created  
 Full time jobs created **402 x 21%** [% of Camden residents who work in Camden] = **84.4 x 35%** [% of employees requiring training] = **29.5 x £3,995** [£ per employee requiring training] = **£118,015.76**

25.8 Within the previous application, a contribution was secured in respect of the Hotel Floorspace and the training and employment offer this use could offer. The applicant paid £12,773.01 for employment and training for the hotel element and therefore, this figure has been subtracted from the uplift which is recommended to be secured. The figure is therefore; **£105,242.75** (£118,015.76 - £12,773.01).

25.9 The proposals are therefore in accordance with the guidance set out in Employment Sites and Business Premises CPG 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.

## 26 COMMUNITY INFRASTRUCTURE LEVY (CIL)

### Mayor of London's Crossrail CIL

26.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL). The CIL contribution for Plot A was secured through the previous application. 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 for Plot B and C as 46,390.15sqm this equates to a Mayoral CIL payment of £2,319,500. 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

26.2 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 following elements of the floorspace would be subject to a CIL payment:

- Office (Use Class E (Workspace))
- Residential (Use Class C3)
- Flexible Retail (Class E a-g)
- Gym (D1) – no payment required
- Storage (B8) – no payment required

26.3 The final figure 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. The CIL contribution for Plot A associated to the previous permission has already been collected. An informative would be attached on any decision notice advising the applicant of these charges. The final charges would be decided by Camden's CIL team.

## 27 PLANNING OBLIGATIONS

27.1 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.

<b>Contribution Previously collected under 2017/5497/P</b>	<b>Amount (£)</b>
Highways	£91,771.29
Contribution towards bridge	£1,000,000
Legible London signage	£32,000
Pedestrian, cycling and environmental contributions	£1,500,000
Affordable Housing payment in lieu of phasing	£381,694
LWT Canal Project	£46,000
<b>Total Collected to date</b>	<b>£3,057,468.29</b>
<b>Contribution Sought</b>	<b>Amount (£)</b>
CMP Monitoring fees	£50,000
CMP Construction Bond	£60,000
Travel plan monitoring for Workplace	£21,948
Travel plan monitoring for Residential	£3,216
Approval in Principle (AIP) report – review and sign off	£3,600

Carbon Offset Contribution	£298,580
Post Construction Training	£105,242.75
<b>TOTAL</b>	<b>£567,586.75</b>

### Heads of Terms

27.2 A previous Section 106 legal agreement was signed against the extant permission. This recommendation is for a revised Section 106 agreement and all the previous clauses have been carried over and updated as detailed below:

Affordable housing including updated unit numbers:

- Early Stage Review
- Target rents
- Affordable housing

Basement

- Basement Construction Plan (BCP)

Employment and training with an updated Affordable workspace offer:

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per paragraph 67 of Employment Sites and Business Premises CPG.
- Provision of **176sqm** of floorspace at a rate of 30% for a community charity for 10 years;
- An Affordable workspace plan to provide 2,787sqm of affordable workspace (AWS) which would be marketed at 50% of market value and retained for 50 years including: phasing and location, transfer to affordable workspace provider, costs, ownership, types.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with Camden's 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 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.
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction or non-construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per paragraph 64 of the Employment Site and Business Premises CPG. Recruitment of construction apprentices should be conducted through the Council's Construction Skills Centre.
- The applicant must also sign up to the Camden Local Procurement Code, as per paragraph 64 of the Employment Site and Business Premises CPG.

- The S106 should broker a meeting between the end user(s) of the ground floor retail units and the Inclusive Economy team to discuss our employment and skills objectives.
- A retail Strategy for the ground floor units.
- 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.
- 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 – Plot B and C should achieve a minimum 40% CO2 reduction beyond Part L2A 2014 AND 20 % reduction through renewables as defined within the approved statements.
- Sustainability measures for the whole development in accordance with approved statements
- Carbon Offset contribution of £298,580
- Review and revision to Energy Statement of Plot C prior to commencement of works on Plot C
- 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

#### 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 and commercial properties
- 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 B and C.
- Construction Impact Bond for each pf Plots B and C.

- 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.
- Delivery and Servicing Management Plan, provided for each Plot.
- Workplace Travel Plans 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.

## **28 CONCLUSION**

- 28.1 The proposed amendments to the development are well thought through and enhance the design and overall consideration of the previously approved application.
- 28.2 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 uplift of commercial floorspace in this location is considered to be acceptable when considered in the context of the extant permission, the planning benefits of the scheme and the overall context of the development. The increased 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, which are enhanced by this variation application.
- 28.3 The applicant has sought to continue to build on the previous permission and 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.
- 28.4 Overall, the proposed amendments are considered to be acceptable and the mixed use development is well considered, removing the previously proposed CHP unit, offering an improvement in the affordable housing and affordable workspace offer which is welcomed. The design changes are considered to enhance the previous application and preserve and enhance the Regents Canal and neighbouring conservation area. It is therefore recommended for approval subject to conditions, Section 106 and referral to the Mayor.

## **29 RECOMMENDATION**

- 29.1 Grant conditional planning permission subject to Section 106 Legal Agreement and referral to the Mayor of London for his direction.**

### 30. CONDITIONS

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

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

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans-Site Location Plan; 1603\_P\_001 Rev H; 1603\_P\_098 Rev J; 1603\_P\_099 Rev P; 1603\_P\_100 Rev Q; 1603\_P\_100; 1603\_P\_101 Rev M; 1603\_P\_102 Rev L; 1603\_P\_103 Rev L; 1603\_P\_104 Rev K; 1603\_P\_105 Rev M; 1603\_P\_106 Rev M; 1603\_P\_107 Rev L; 1603\_P\_108 Rev P; 1603\_P\_RP Rev K; 1603\_P\_131 Rev E; 1603\_P\_132 Rev E; 1603\_P\_231 Rev F; 1603\_P\_240 Rev H; 1603\_P\_302 Rev F; 1603\_P\_304 Rev F; 1603\_P\_321 Rev J; 1603\_P\_322 Rev J; 1603\_P\_323 Rev J; 1603\_P\_324 Rev K; 1603\_P\_350 Rev J; 1603\_P\_451 Rev D; 1603\_P\_457 Rev A; 1603\_P\_458 Rev A; 1603\_P\_459 Rev A; 1603\_P\_460 Rev A; 1603(SC)001 Rev P; Planning Statement May 2021; Flood Risk Assessment and SUDS Strategy Rev C 2018; BREEAM Assessment P01 December 2020; Fire Strategy Plot B dated May 2021; Energy Statement P01 Dated April 2021; Basement Impact Assessment Version F Dated 11th May 2021; Transport Assessment Addendum Dated May 2021; Retaining Wall Assessment dated 19th May 2020; Arboricultural Impact Assessment dated March 2018; Townscape, Visual and Built Heritage Assessment Addendum dated May 2021; Health Impact Assessment April 2021; Regeneration Statement dated April 2021; Air Quality Assessment May 2021; Outline Construction Management Plan May 2021; Noise Assessment Report May 2021; Daylight and Sunlight Addendum Dated April 2021; Wind Microclimate Statement of Conformity dated April 2021;

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

- 3 Detailed drawings/samples - Plot B

Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:

- a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.
- b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale on-site sample panel of brickwork, fins, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.
- c) Details of all new balustrade, railings at a scale of 1:10 with finials at 1:1, including method of fixing with samples of railings (to be provided on site).
- d) A sample panel of brickwork no less than 2m by 2m including junction with

window opening demonstrating the proposed colour, texture, face-bond, pointing, expansion joints and vertical and horizontal banding, shall be erected on site for inspection for the local planning authority and maintained for the duration of the works.

e) A sample panel of all facing materials should be erected on-site for inspection for the local planning authority and maintained for the duration of the works.

f) Detailed plans of all new external servicing, including but not restricted to plant enclosure, vents, flues, rainwater goods, SVPS.

The relevant part of the works shall then be carried in accordance with the approved details

#### 4 Detailed drawings/samples - Plot C

Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:

a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.

b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale on site sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.

c) Details of all new balustrade, railings at a scale of 1:10 with finials at 1:1, including method of fixing with samples of railings (to be provided on site).

d) A sample panel of brickwork no less than 2m by 2m including junction with window opening demonstrating the proposed colour, texture, face-bond, pointing, expansion joints and vertical and horizontal banding, shall be erected on site for inspection for the local planning authority and maintained for the duration of the works.

e) A sample panel of all facing materials should be erected on-site for inspection for the local planning authority and maintained for the duration of the works.

f) Detailed plans of all new external servicing, including but not restricted to vents, flues, rainwater goods, SVPS.

The relevant part of the works shall then be carried in accordance with the approved details

Reason: To safeguard the appearance of the premises and the character of the surrounding conservation area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan.



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

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy D1 and D2 of the London Borough of Camden Local Plan 2017.

- 6 Circular Economy and Operational waste Management Strategy

Prior to commencement of demolition, a Circular Economy Statement and Operational waste Management Strategy shall be submitted to and approved in writing by the Council.

Reason: To ensure that the development minimises waste and supports the circular economy in order to maximise the re-use of materials in line with London Plan Policy SI 7 and the Circular Economy Statements draft London Plan Guidance 2021.

- 7 Prior to the occupation of Plot B, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in line with London Plan Policy SI 7 and the Circular Economy Statements draft London Plan Guidance 2021.

- 8 Prior to the occupation of Plot C, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in line with London Plan Policy SI 7 and the Circular Economy Statements draft London Plan Guidance 2021.

9 Refuse and recycling

Prior to commencement of above ground works of each building of Plot B and Plot C, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5 of the Camden Local Plan.

10 Roof terraces

No flat roofs within the development shall be used as terraces unless annotated on the hereby approved plans.

Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy A1 of the Camden Local Plan.

11 Landscape

Prior to the commencement of any above ground works, full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. Such details shall include:

- a) details of any proposed earthworks including grading, mounding and other changes in ground levels.
- b) details of proposals for the enhancement of biodiversity,
- c) an open space management plan,
- d) detailed plans, including sections of the tree pits, to include one continuous tree pit for trees adjacent to the canal,
- e) details of proposed replacement trees.
- f) design and maintenance regime for the biodiverse roofs that will ensure only low nutrient runoff will be discharged to appropriate drainage systems.

The relevant part of the works shall be carried out within the first planting season prior to completion and not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A1, D1 and A2 of the Camden Local Plan.

12 All hard and soft landscaping works shall be carried out in accordance with the approved landscape details prior to the occupation for the permitted use of the development. Any trees or areas of planting (including trees existing at the outset

of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, A5, D1 and D2 of the London Borough of Camden Local Plan 2017.

13 Hours of use: Building C2 (Class E (b))

Any units within Building C2 which operate as food & drink uses (Class E(b)), shall not be open to customers outside the following times :

7am to 11:00pm Monday to Saturday, and  
8am to 10:00pm on Sundays and Bank Holidays.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, A1, A4 and TC2 of the Camden Local Plan 2017.

14 Hours of use: Buildings C1, C3 and C4

Any units within the buildings C1, C3 and C4 which operate as food & drink uses (Class E(b)) and drinking establishments (Sui Generis), shall not be carried out outside the following times :

7am to 11:30pm Monday to Thursday,  
7am to Midnight Friday and Saturday, and  
7am to 10:00pm on Sundays and Bank Holidays.

Reason: To ensure that the amenity of occupiers of residential properties in the area is not adversely affected by noise and disturbance in accordance with Policy A1 of the Camden Local Plan 2017.

15 Sui Generis limitation building C2

There shall be no drinking establishments (Sui Generis) within building C2.

Reason: To ensure that the amenity of occupiers of residential properties in building C2 are not adversely affected by noise and disturbance in accordance with Policy A1 of the Camden Local Plan 2017.

16 Small units

Notwithstanding the hereby approved plans, a minimum of two small units (200sqm or less) shall be provided at any one time.

Reason: To promote the provision of smaller shop premises in accordance with Policy TC5 of the Camden Local Plan 2017.

17 Use of Terrace to Building C4

The use of the roof terrace hereby permitted on Block C4 shall not be carried out outside the following times 0730-2300 Mondays to Saturdays and 0830-2300 on Sundays and Bank Holidays.

Reason: To safeguard the amenities of the nearest residential properties and the area generally in accordance with the requirements of policies G1, A1, A4 and TC2 of the London Borough of Camden Local Plan 2017.

18 Floorspace Limitations

A minimum of 80% of the ground floor level flexible floorspace shall be occupied in Class E (a, b, c, e, f) and Drinking establishment (Sui Generis) use at any one time.

Reason: To safeguard the character, function, vitality and viability of the area in accordance with policies G1, A1, TC1 and TC3 of the Camden Local Plan 2017.

19 Floorspace limitations Class E (a, c, e, f) Retail and commercial

A minimum of 10% of the hereby approved Flexible floorspace (annotated on the plans as Class E) be occupied in Class E (a) or Class E (c) or Class E (e) or Class E (f) use at any one time.

Reason: To safeguard the character, function vitality and viability of the area and to safeguard the amenity of the future and existing occupiers of the development site in accordance with policies G1, A1, TC1 and TC3 of the Camden Local Plan 2017.

20 Floorspace limitations Class E (b) Food and drink

A maximum of 40% of the hereby approved Flexible floorspace (Class E) shall be occupied in Class E (b) use at any one time.

Reason: To ensure the future occupation of the development does not lead to an overconcentration of restaurants and cafes in the area and safeguard the character, function vitality and viability of the area and to safeguard the amenity of the future and existing occupiers of the development site in accordance with policies G1, A1, A4, TC1 and TC3 of the Camden Local Plan 2017.

21 Floorspace limitations Sui Generis (bar)

A maximum of 30% of the hereby approved Flexible floorspace, annotated as Sui Generis (bar) shall be occupied as Drinking Establishment (Sui Generis) use at any one time.

Reason: To ensure the future occupation of the development does not lead to an overconcentration of drinking establishments in the area and safeguard the character, function vitality and viability of the area and to safeguard the amenity of the future and existing occupiers of the development site in accordance with policies G1, A1, A4, TC1 and TC3 of the Camden Local Plan 2017.

22 Class E (d) use

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification) the gym within Class E(d) shall only be in use as a gym as annotated on the hereby approved plans.

Reason: To ensure that the future occupation of the building does not adversely affect the adjoining premises/immediate area by reason of noise traffic congestion and excessive on-street parking pressure in accordance with policies G1, CC1 and A1 of the London Borough of Camden Local Plan 2017.

23 SUDS

Prior to commencement of development on each plot, other than works of demolition, site clearance and preparation, full details of the sustainable drainage system as stated in the approved document 'Flood Risk Assessment and SuDS Strategy' dated 31/08/2017, prepared by Water Environment Limited on behalf of GD Partnership Ltd, shall be submitted to and approved in writing by the local planning authority. Details shall include the following SuDS measures:

- a) Plot B: Combination biodiverse/blue and blue roofs: 41.7 m3 storage  
Cellular attenuation tank buried under basement car park: 34.2 m3 storage  
Controlled outflow to combined sewer: 22.6 l/s discharge rate  
Controlled outflow to Regent's Canal: 13.1 l/s discharge rate
- b) Plot C: Combination biodiverse/blue and blue roofs: 55.0 m3 storage  
Cellular attenuation tanks buried under external paving: 150.0 m3 storage  
Controlled outflow to combined sewer: 83.8 l/s discharge rate  
Controlled outflow to Regent's Canal: 17.3 l/s discharge rate

Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and shall demonstrate a minimum 50% reduction in total run-off rate as stated in the approved document.

Plot B 35.7 l/s discharge rate  
Plot C 101.1 l/s discharge rate

Details shall include for the relevant plot a site-specific lifetime maintenance plan, overland flow routes for exceedance events, an interim drainage strategy for the demolition and construction phase, and final discharge approvals, and shall thereafter be retained and maintained in accordance with the approved details.

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

24 SUDS Compliance

Prior to occupation of each plot, evidence that the SuDS systems have been implemented in accordance with the approved details shall be submitted to and approved in writing by the Local Planning Authority. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

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

25 Cooling

Notwithstanding the hereby approved submission documents, active cooling (Air Conditioning) shall only be permitted where dynamic thermal modelling demonstrates there is a requirement for such cooling after application of the cooling hierarchy. Dynamic thermal modelling shall be submitted to and approved in writing by the Local Planning Authority prior to the installation of any active cooling.

Reason: To ensure the development adopts appropriate climate change adaptation measures in accordance with Policy CC2 of the Camden Local Plan 2017.

26 Air Quality Plot C

Prior to the commencement of Plot C an Air Quality Assessment (AQA), solely for Plot C, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure Plot C is built as an air quality neutral development and would safeguard the amenity of the future occupiers of Plot C in accordance with Policies A1 and CC4 of the Camden Local Plan 2017.

27 Water efficiency

The residential units hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation of residential units, evidence demonstrating that this has been achieved shall be submitted and approved by the Local Planning Authority.

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

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

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

- 29 Living roof details and installation

Prior to the commencement of any above ground works of each building, a detailed plan of the biodiverse substrate roofs in the areas indicated on the approved roof plans shall be submitted to and approved by the local planning authority. The details shall include species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the biodiverse roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. The biodiverse roof shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme of maintenance.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC1, CC2 and CC3 of the Camden Local Plan.

- 30 Prior to first occupation of the buildings, detailed plans showing the location and extent of photovoltaic cells to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of Policy G1, CC1 and CC2 of the London Borough of Camden Local Plan 2017.

- 31 Plot C Solar PV assessment

Prior to the commencement of works on Plot C an assessment into the implementation of further renewable technology on site shall be submitted to and approved in writing by the Local Planning Authority. Approved details shall be implemented prior to the occupation of any buildings within Plot C and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy

facilities in accordance with the requirements of policies CC1 and CC2 of the Camden Local Plan 2017.

- 32 In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported in writing immediately to the local planning authority. An investigation and risk assessment must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11), and where mitigation is necessary a scheme of remediation must be designed and implemented to the satisfaction of the local planning authority before any part of the development hereby permitted is occupied.

Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.

- 33 Wind Mitigation

Prior to commencement of above ground works to buildings C2 and C4 details of wind mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. These measures shall be implemented prior to first occupation.

Reason: To safeguard the amenities of users of the terrace areas, in accordance with the requirements of policy A1 of the Camden Local Plan 2017.

- 34 Sound insulation

Prior to commencement of above ground works to Plot C of the relevant buildings, detailed technical specifications of the building envelope (glazed and non-glazed elements) shall be submitted to and approved in writing by the local planning authority. The assessment shall include full details of the proposed building construction and composite façade calculations to predict the internal noise level in habitable rooms. Internal noise levels in habitable rooms shall comply with BS8233:2014 and Appendix 3: Noise Thresholds of the Local Plan.

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental noises sources in accordance with the requirements of policies G1, D1, A1, and A4 of the London Borough of Camden Local Plan 2017.

- 35 Plant and equipment

Prior to commencement of above ground works of Plot C, details of the sound insulation of the floor and walls separating all non-habitable uses (for example retail, residential gym, office, workshop) uses from adjacent residential uses shall be submitted to and approved in writing by the local planning authority. Such details shall demonstrate that the sound insulation value  $D_{nTw+Ctr}$  is enhanced by at least 10dB above the Building Regulations value for Class E (b), and Sui



Generis (gym) uses and 5dB above the Building Regulations value for Class E (a) (non-music) and Class E (g) (office).

The details as approved shall be implemented prior to first occupation and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site / surrounding premises is not adversely affected by noise from mechanical installations/ equipment, in accordance with Policy A4 of the Camden Local Plan 2017.

#### 36 Cycle parking - Long Stay

Prior to first occupation of the relevant plot, the following bicycle parking shall be provided:

- a) Plot B secure and covered parking for 330 bicycles
- b) Plot C secure and covered parking for 380 bicycles for the commercial element, 39 for the retail element, 2 for the gym and 126 for the residential units.

All such facilities shall thereafter be retained.

Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policies T1 and T3 of the Camden Local Plan 2017.

#### 37 Cycle Parking - Short Stay

Prior to the commencement of any above ground works, a detailed plan annotating the provision of 110 visitor cycle spaces in respect of each phase of the hereby approved development shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking shall be provided in accordance with the approved plans prior to occupation of the relevant building. All cycle stands shall thereafter be retained and maintained.

Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policies T1 and T3 of the Camden Local Plan 2017.

#### 38 Canal Wall

Prior to the commencement of any works on site, details of mitigation measures that will be put in place to ensure the development does not impact on the structural integrity of the canal shall be submitted to and approved in writing by the Local Planning Authority. Approved measures shall remain in situ during the construction works.

Reason: To ensure the development would not cause undue harm to the adjacent canal in accordance with policy A3 of the Camden Local Plan 2017.

#### 39 Provision of electric charging points - Plot C

Prior to the occupation of residential units within Plot C one electrical charging point shall be provided by the two disabled car parking spaces hereby approved. The charging points shall be provided in their entirety prior to occupation of any units, in accordance with the details thus approved and thereafter be permanently maintained and retained.

Reason: To encourage the uptake of electric vehicles, in accordance with the London Plan 2021.

#### 40 Biodiversity Enhancements

Prior to the commencement of above ground works, a plan showing details of biodiversity enhancements on the buildings and within the open space (including details of bird and bat boxes) appropriate to the development's location, scale and design shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.

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

#### 41 Lighting Strategy

Before the relevant part of each Plot commences full details of a lighting strategy, to include information about potential light spill on to the canal, buildings, trees and lines of vegetation, shall be submitted to and approved by the Local Planning Authority in writing. The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the premises are first occupied.

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

#### 42 Prior to commencement of any impact piling, a piling method statement shall be submitted to and approved in writing by the local planning authority. The Method Statement shall be prepared in consultation with Thames Water or the relevant statutory undertaker, and shall detail the depth and type of piling to be undertaken and the methodology by which such piling will be carried out including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: To safeguard existing below ground public utility infrastructure and controlled waters in accordance with the requirements of Policy CC3 of the London Borough of Camden Local Plan 2017.

43 Existing Water Supply Infrastructure

Prior to the commencement of above ground works, an impact studies of the existing water supply infrastructure shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. The study shall identify any new additional capacity required in the system and suitable connection point.

Reason: To ensure the water supply infrastructure has sufficient capacity to copy with the additional demand in accordance with the requirements of Policy A5 of the Camden Local Plan 2017.

44 Plant Noise

Prior to occupation of Plot B of the development, details shall be submitted to and approved in writing by the Council, of the external noise level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/ equipment will be lower than the lowest existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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

45 Plant Noise

Prior to occupation of Plot C of the development, details shall be submitted to and approved in writing by the Council, of the external noise level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/ equipment will be lower than the lowest existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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

46 Noise levels

Noise levels at a point 1 metre external to sensitive facades shall be at least 10dB(A) less than the existing background measurement (LA90), expressed in

dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 15dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1, and A4 and TC3 of the London Borough of Camden Local Plan 2017.

- 47 No music shall be played on the premises in such a way as to be audible within any adjoining premises or on the adjoining highway.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1, and A4 and TC1, TC3, TC4 and TC5 of the London Borough of Camden Local Plan 2017.

- 48 Accessibility: M4(2) and M4 (3)

Prior to above ground works of Plot C, a plan showing the location and the details of 1 2b4p fully accessible wheelchair unit and the 2 1b2p wheelchair adaptable units are submitted to and approved by the Local Authority, designed and constructed in accordance with Building Regulations Part M4 (2) and Part M4 (3).

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy C6 of the Camden Local Plan 2017.

- 49 Accessibility: M4 (2) and M4(3)

Prior to occupation of the residential units, evidence demonstrating compliance of providing 3 wheelchair units (1 fully accessible and 2 x wheelchair adaptable units) should be submitted to and approved by the Local Planning Authority prior to occupation. The units shall be retained as such for perpetuity.

Reason: To ensure that the wheelchair units would be capable of providing adequate amenity in accordance with policy C6 of the Camden Local Plan 2017.

- 50 Prior to the commencement of any piling, a survey of the condition of the waterway wall, and a method statement and schedule of works identified shall be submitted to and approved in writing by the Local Planning Authority. Any heritage features and materials identified by the survey shall be made available for inspection by the Canal & River Trust. The repair works identified shall be carried out in accordance with the agreed method statement and repairs schedule by a date to be confirmed in the repairs schedule.

Reason: To ensure that the structural integrity of the Regent's Canal is retained in line with policies A5 and CC3.

## 51 Fire Strategy

No above ground new development shall commence (excluding demolition and any site preparation works) on Plot C, until a Fire Strategy Statement has been submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The relevant Phases of the development shall be carried out in accordance with the approved details.

Reason: In order to provide a safe and secure development in accordance with policy D12 of the London Plan.

## 52 Fire Statement

Prior to fit out of Plot B, a Final Detail Design Fire Statement should be submitted and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the final Fire Strategy for Plot B in line with the Fire Strategy hereby approved. Plot B of the development shall be fitted out in accordance with the approved and maintenance details.

Reason: In order to provide a safe and secure development in accordance with policy D12 of the London Plan 2021.