

Travis Perkins, St Pancras Way, Kings Cross

in the London Borough of Camden

planning application no. 2011/1586/P

Strategic planning application stage II referral (new powers)

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

The proposal

Full planning permission for a mixed use redevelopment, comprising 3,877 sq.m. builders merchant, together with student accommodation on upper floors (563 bedspaces).

The applicant

The applicants are **Unite Group** and **Travis Perkins**, and the architect is **Bellis Cooley**.

Strategic issues

At consultation stage, the principle of **mixed-use** redevelopment of the site with student housing was accepted in strategic planning terms. There were, however, a number of outstanding strategic issues relating to **urban design**, the **energy** strategy and **transport** that required addressing before the scheme could be considered fully compliant with the London Plan. There has subsequently been further information provided and some revisions to the scheme in an attempt to resolve those issues, as detailed in this report.

The Council's decision

In this instance Camden Council has resolved to grant permission.

Recommendation

That Camden Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 18 April 2011 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Categories 1B and 1C of the Schedule to the Order 2008:

“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— (c)outside Central London and with a total floorspace of more than 15,000 square metres; and

“Development which comprises or includes the erection of a building of ... more than 30 metres high and is outside the City of London.”

2 On 25 May 2011 the Mayor considered planning report PDU/2756/01, and subsequently advised Camden Council that the application did not comply with the London Plan, for the reasons set out in paragraph 109 of the above-mentioned report but that the possible remedies set out in paragraph 111 of that report could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 21 July 2011 Camden Council decided that it was minded to grant planning permission and on 8 August 2011 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Council under Article 6 to refuse the application or issue a direction to Camden Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 19 August 2011 to notify the Council of his decision and to issue any direction.

4 Since this application was referred to the Mayor at Stage I, the Mayor’s London Plan (2011) was formally published on 22 July 2011. As such, this is now the relevant document for the purposes of the Statutory Development Plan.

5 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk

Update

6 At the consultation stage, Camden Council was advised that whilst the principle of the use was acceptable, there were certain areas in which clarification and further information was required in order to ensure compliance with the London Plan. This related to the student accommodation, urban design, inclusive design and accessibility, sustainable development and transport matters. Addressing each point in turn, the following is noted:

Principle of use

7 When considering the scheme at Stage 1, it was noted that the mixed use development as proposed was acceptable in principle, subject to the student accommodation being secured to an end user by way of section 106 legal agreement.

8 The applicant advises that its business model involves renting accommodation directly to students themselves, and as such the accommodation does not serve a specific higher education institution. A letter of support from University of Westminster has been submitted, and the proximity to a number of other institutions is also noted. In response to concerns raised by the Council regarding the potential for over concentration of student accommodation in Camden, the applicant has prepared a report that assesses the existing supply and that in the pipeline, and provides details of demand from local education institutions.

9 The Council has included planning obligations that restrict occupation to full or part time students enrolled on a course within Camden and adjacent boroughs, that they cannot be sold or let as self-contained units in the general market, and to set a benchmark price for the rooms to

ensure affordability. These commitments are welcomed and ensure compliance with London Plan policy 3.8.

Urban design

10 At the consultation stage, concern was raised about the architectural approach, scale, bulk, massing and detailed design and it was advised that further information and amendments were required in order for the scheme to comply with London Plan design policies.

11 The applicant has undertaken some revisions to the scheme as a result of these concerns, and those raised by the Council. Discussions have taken place with the Council's design officers and amendments that include: repositioning the stair cases, increasing the size of the windows, amending the window layout, altering the ground floor elevation at the southern end, and setting back the top floor by 0.5 metres have taken place. At the southern end at street level, further animation to the facade has been provided, with the frame over the car park entrance being removed, and the concrete podium has been pulled back, with changes to the facade treatment to give it a more retail/domestic presence.

12 The applicant and the Council note that the design of the building is limited by the modular form of construction, which is largely driven by the need to support the blocks on a podium above a functional commercial unit. The applicant has sought to increase the amount of traditional construction on the site, allowing for expression of the protruding boxes, and confirms that the reveals can be achieved by applying the brickwork to a secondary structural skin. It is acknowledged that the staggering of the blocks along the street and in terms of the heights across the site do assist to some extent in mitigating the perceived sense of scale and monotony that is apparent in the elevational plans, and that the curve of the street and layout is such that only limited longer range views of the building would be possible. The revisions to the fenestration pattern, including double height vertical slots to the tallest block further assist in reducing the perceived bulk.

13 Whilst the fundamental concerns regarding the modular pre-fabricated system and the restrictions it imposes in relation to articulation and variation that were raised at Stage 1 have not resulted in a wholesale review of the scheme, the amendments that have been made are welcomed, and do assist to some extent in addressing the repetitive pattern and monotony that was noted as a concern. The Council's view that the characteristics of the area are such that the development would not unduly dominate the area and that it is appropriate for its context are acknowledged, and it is accepted that the scale of development is largely in keeping with other buildings that have been recently permitted or completed along St Pancras Way.

14 In relation to concerns raised at the initial consultation stage regarding the standard of accommodation, the applicant has increased the amount of communal floor space and a financial contribution towards community facilities in the vicinity has been secured. The room sizes follow a model that is being used on Unite schemes around London, with students having their own personal space, together with common rooms, roof terraces, and shared kitchens.

15 In summary, the issues identified at consultation stage in relation to design matters have been addressed to some extent, and whilst concerns about the quality of the scheme and its scale still remain to a point, it is accepted that these are capable of being addressed by the Council and applicants through submission of details of materials and treatment at construction stage. The Council's and the community's support for the scheme and the regeneration benefits it would bring are acknowledged, together with the close working between the applicant and the Council to reach agreement in light of the restrictions imposed by the architectural approach. The Council has imposed appropriately worded conditions to secure details of materials and finishes so as to ensure a high quality result. On balance, given the local support for the scheme and regeneration benefits

it will bring, together with the Council's assurances that finishing and materials will need to be of high quality, the scheme is acceptable in strategic planning terms.

Inclusive design and accessibility

16 At the consultation stage, the efforts made to make the scheme as accessible as possible were noted, but further information was required in relation to the design and layout of the accessible units. It was unclear at the time as to the number of rooms that would be designed to be fully accessible or adaptable, and whether the units were of sufficient size to enable adaptation.

17 The applicant has subsequently amended the scheme to provide 50 rooms (8.9%) as accessible, of which 28 rooms (5%) would be fully fitted out accessible rooms and 21 (3.8%) as capable of adaptation in the future. Layout plans have been submitted showing the accessible rooms at a larger scale, together with floor plans showing where these rooms would be located across the building. Adjustments have been made to the location of the rooms in relation to the communal space, such that they are now located near the larger kitchens. The Council has also imposed a condition requiring detailed drawings to be submitted for approval prior to commencement. These commitments are welcomed and will ensure compliance with London Plan policies 3.8 and 7.2.

Climate change

18 At Stage 1, further information and commitments in relation to carbon savings, demand reduction, energy efficiency, cooling and potential for linking to future district heating networks. The possibility of using photovoltaic panels also required investigating.

19 The applicant has subsequently provided further information to address the points raised. Details have been provided regarding u-values, the Euston Road district heating network, and the CHP system. The applicant has provided details of measures proposed to avoid heat gain within the student accommodation, and plans showing the provision photovoltaic panels have been also been submitted. The Council has imposed a section 106 obligation securing the recommendations of the applicant's energy report.

20 The applicant was also asked to provide further details of climate change adaptation measures, including green roofs, sustainable urban drainage systems and passive design. The applicant has confirmed that 455 sq.m. of green and brown roofs are proposed, which would contribute towards a sustainable urban drainage system for the development and towards biodiversity enhancement. Conditions have been secured requiring further details of the green and brown roofs prior to commencement of development.

21 On this basis, outstanding issues raised at the initial consultation stage have been sufficiently addressed and the scheme is considered to be in accordance with London Plan climate change policies.

Transport

22 At the initial consultation stage, Transport for London raised a number of issues in relation to transport matters, specifically in relation to trip rates, cycle hire, cycle parking, safety review of local cycling infrastructure, pedestrian environment, Legible London, car parking and public transport impact. Details regarding the travel plan, student management plan and a delivery and servicing plan and construction logistics plan were requested to be secured by condition.

23 Since then, further negotiation and discussion has taken place between the parties. Of particular note is that a contribution of £132,000 has been included within the section 106 agreement towards additional Mayor's Cycle Hire capacity in the local area. This is in addition to

£28,000 towards the delivery of Legible London and £25,000 towards pedestrian and cycle environment improvement within the local area including road safety improvements.

24 The proposed car parking has also been revised in line with TfL's recommendations and is now considered acceptable. Furthermore, the student element has been secured as car free within the section 106 agreement heads of terms. The parking proposals are now considered to be in accordance with London Plan policy 6.13. Revised cycle parking plans confirming the level of cycle parking have been submitted by the applicant. These changes are welcomed by TfL and in accordance with London Plan policy 6.9.

25 A multi-modal trip rate assessment has been provided by the applicant, to TfL's satisfaction, which justifies that the development will not have a detrimental impact on the public transport network and therefore no contribution to improve the local bus network and infrastructure is required.

26 The Council has imposed a section 106 obligation stating that student accommodation can only be let to full or part time students enrolled on a course within Camden and adjacent boroughs (where the provider of that course is funded by Higher Education Funding Council for England). This is welcomed by TfL, ensuring transport impacts are localised.

27 Also welcomed is a section 106 contribution of £30,000 towards a feasibility study for a foot/cycle bridge over Regent's Canal, with a £200,000 contribution towards the implementation of subsequent works should the bridge be delivered.

28 Following discussion with Camden Council, officers are satisfied that the local pedestrian network is of an adequate standard and therefore, neither a PERS audit nor pedestrian comfort assessment is required in this instance. A contribution of £65,000 towards footway reinstatement will be paid to the Council, in accordance with London Plan policy 6.10.

29 A travel plan for the student accommodation, together with a student management plan, construction and logistics plan, and delivery and servicing plan have all been included within the section 106 legal agreement. Neither a travel plan nor a delivery and servicing plan is necessary for the builders' merchants.

30 In summary, all outstanding transport issues have been resolved and on this basis, the application is now considered to be in accordance with the London Plan and is acceptable in transport terms.

Response to consultation

31 The application was advertised by site and press notices and consultation letters, which were sent to 93 neighbouring properties.

32 No objections were received however, letters were received from adjoining occupiers at the Royal Veterinary Hospital and St Mungos supporting the development. Letters of support were also received from the three ward councillors.

33 Other statutory consultees responded as follows:

- **Regents Canal Conservation Area Advisory Committee (CAAC):** Objects to the scheme due to impact upon conservation area, by reason of scale and design, residential presence, and inflexibility of the construction system.
- **Kings Cross CACC:** Objects to the scheme due to the design and scale. Considers that the continuous frontage and facade treatment emphasises the inhuman scale of the development.

34 In terms of the objections raised by the two advisory committees, the strategic design issues were considered in paragraphs 10 to 15 of this report and for the reasons set out there, on balance, the scheme is considered to be acceptable.

Article 7: Direction that the Mayor is to be the local planning authority

35 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

36 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction. The Mayor must also have regard to the guidance set out in GOL circular 1/2008 when deciding whether or not to issue a direction under Articles 6 or 7.

Financial considerations

37 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

38 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

39 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

40 Having regard to the details of the application, the matters set out in Camden Council's committee report and its draft decision notice, this scheme is acceptable in strategic planning terms. Further information has been provided, which together with conditions (and planning obligations) imposed by Camden Council, largely address the outstanding issues that were raised at

Stage 1, and on balance, the design approach is accepted. On this basis, there are no sound reasons for the Mayor to intervene in this particular case.

Travis Perkins, St Pancras Way, Kings Cross

in the London Borough of Camden

planning application no.

Strategic planning application stage 1 referral (new powers)

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

The proposal

Full planning permission for a mixed use redevelopment, comprising 3,877 sq.m. builders merchant, together with student accommodation on upper floors (564 bedspaces).

The applicant

The applicant is **Unite Group** and **Travis Perkins**, and the architect is **Bellis Cooley**.

Strategic issues

Subject to securing the use as student housing, the principle of a **mixed-use** development that retains an **employment use** on the site is acceptable.

There are a number of planning issues that will also need to be resolved before this application can be considered to fully comply with London Plan policy, including in relation **urban design, accessibility, climate change** and **transport**.

Recommendation

That Camden Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 109 of this report but that the possible remedies set out in paragraph 111 of this report could address these deficiencies.

Context

1 On 18 April 2011 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 27 May 2011 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

Category 1B: *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— (c)outside Central London and with a total floorspace of more than 15,000 square metres.*

Category 1C: *“Development which comprises or includes the erection of a building of ...more than 30 metres high and is outside the City of London.”*

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

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 This 4,700 sq.m. site is located on the west side of St Pancras Way, which runs between Kings Cross and Camden Town. It presently contains a double height warehouse building and yard space, occupied by Travis Perkins, a builders merchant.

6 The site sits between the Kings Cross St Pancras Conservation Area and the Regents Canal Conservation Area. The surrounding area is mixed in scale and character, ranging from the low-scale brick built Royal Veterinary College and St Mungos homeless shelter to the south, through to a seven-storey student housing scheme to the north, with a Royal Mail Sorting office and other modern residential developments along St Pancras Road beyond that.

7 The primary entrance to the site is directly on to St Pancras Way, with a secondary access located to the north of the site, on the corner of St Pancras Way and College Grove.

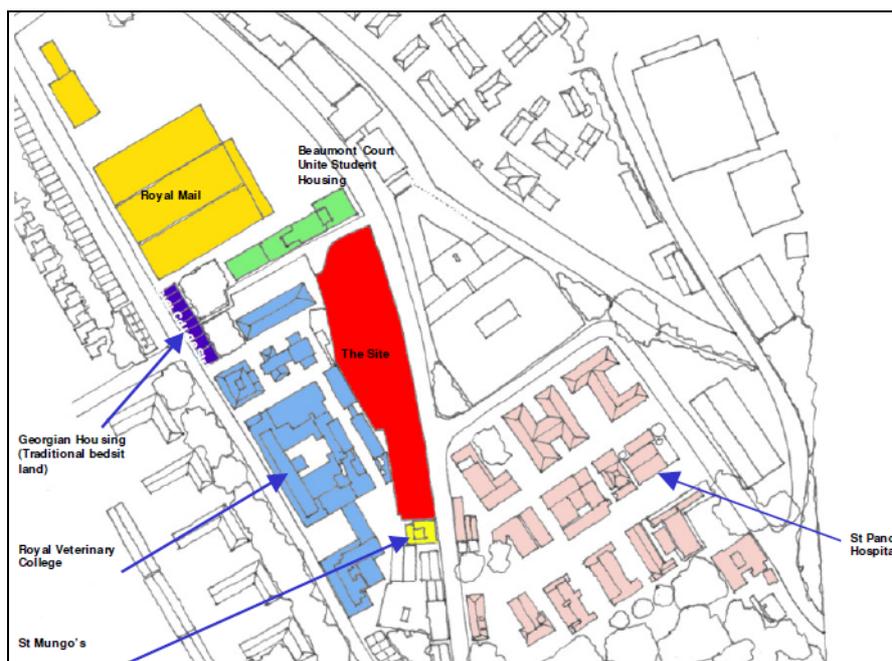


Fig 1: Site location (source: submitted Design and Access Statement)

Details of the proposal

8 The scheme proposes redevelopment of the site, comprising erection of a ten-storey building to contain a Travis Perkins builders merchant with student accommodation facilities above.

9 The accommodation for Travis Perkins would replace the existing business on the site and comprise 3,877 sq.m. arranged over the lower part of the building fronting St Pancras Way, with a mezzanine shop and office space located at the southern end. A covered one-way vehicle access route would be provided within the building, with dedicated customer pick-up and drive through areas.

10 Student accommodation, comprising 564 bed spaces arranged in a series of cluster flats (up to 8 bedrooms) and studios, would be located over first to ninth floor level. This would be operated by Unite - the applicant for the scheme, and a provider of purpose-built student accommodation across the United Kingdom.

Case history

11 GLA officers were involved in pre-application discussions with the applicant and Camden Council officers in March 2011 (PDU/2756). The advice provided was that whilst the principle of a mixed-use scheme was acceptable, a number of strategic planning policy concerns were raised in relation to the demand for student accommodation, the design, scale and massing, amenity space, inclusive design, climate change and the transport strategy.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Land use *London Plan;*
- Student Housing *London Plan; PPS3; Housing SPG*
- Urban design *London Plan; PPS1*
- Inclusive design and access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Energy and climate change *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13;*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Camden Core Strategy, Development Policies Development Plan Document and the London Plan (Consolidated with Alterations since 2004).

14 The draft replacement London Plan, which underwent Examination in Public in 2010 and upon which the Panel has now reported is a relevant material consideration of significant weight.

Principle of development

15 The principle of mixed use development with commercial floor space at lower level and housing above is welcomed in principle. The commitment of Travis Perkins in terms of maintaining

its presence on this site is welcomed and should ensure that functional and useable employment floor space is retained on the site. The site does not comprise Strategic Industrial Land, as set out in the London Plan, and is not specifically protected for industrial uses. It is however, recognised that Camden Council policies seek to protect employment land. As requested at pre-application stage, it would be appropriate for the applicant to confirm that the existing levels of employment on the site would be maintained or increased as a result of the development.

Student accommodation

16 London Plan policy 3A.25 'Higher and further education' identifies the provision of student accommodation as an important requirement of the higher and further education facilities. Furthermore, paragraph 3.39 of the London Plan recognises that the provision of purpose-built student housing adds to the overall supply of housing and may reduce pressure on the existing supply of market and affordable housing. Paragraph 3.53 states that where a proposal for development relates solely to student housing, it will not normally be appropriate to apply a planning obligation for an element of social rent or intermediate housing. Paragraph 3.69 of the Plan states that shared accommodation or houses in multiple occupation often provide housing for people unable to gain access to social rented housing or to afford market home ownership or rents, and where such accommodation is of a reasonable standard, its provision helps contribute to meeting housing demand and should be encouraged.

17 London Plan policy 3A.25 (Higher and further education) states that the Mayor will and boroughs should work with the London Development Agency and the higher and further education sectors to ensure that the needs of the education sectors are addressed in Development Plan Documents, and that this will include supporting the provision of student accommodation.

18 At a strategic level, there has been a notable increase in planning applications for student accommodation facilities in recent years. This raises concern that the impact of an increased amount of student accommodation being built in London is not being considered in a holistic way. The draft revised London Plan changes the emphasis of strategic policy on student accommodation to an approach that more carefully considers both supply and demand, together with a more dispersed distribution and different forms of provision. Whilst it is acknowledged that there is capacity for upwards of 17,000 student places, addressing these demands should not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. Draft replacement London Plan policy 3.8G 'Housing choice' states that strategic and local requirements for student housing meeting a demonstrable need are to be addressed by working closely with higher and further education agencies and without compromising capacity for conventional homes. There is an expectation that unless student accommodation is secured through a planning agreement for occupation by members of specified educational institutions for the predominant part of the year, it will normally be subject to the requirements of affordable housing policy.

19 As requested at the pre-application stage, the applicant has submitted a needs assessment study to demonstrate the demand for student accommodation in the area. The findings indicate that demand exists for approximately 29,500 rooms within Camden, taking into account schemes in the planning pipeline. The applicant has also outlined which universities the accommodation is likely to serve, including UCL, School of Oriental and African Studies, Birbeck, The Royal Veterinary College, University of Arts and London Metropolitan University, which are in within walking distance to the site. A letter of support has been submitted by the University of Westminster, which states that it is currently unable to provide accommodation to all of its first year students either in university owned accommodation or that operated by specialist providers, thereby indicating the shortage of facilities in its catchment.

20 In terms securing the use or occupation by members of specified educational institutions, the applicant has previously indicated that there are instances where it does enter into legal agreements with particular universities. In this instance however, it envisages that this block will be directly let to students and not let exclusively to a specific higher education provider. In order to satisfy the requirements of the draft replacement London Plan, further discussion with the Council would be appropriate in order to secure the student accommodation and/or end users. For instance, a condition or section 106 planning obligation to restrict the use of the accommodation for use by full time students at higher education institutions in London.

Urban design

21 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained in Chapter 4B. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other policies in Chapter 4B and elsewhere in the London Plan set out design requirements relating to specific issues, including housing quality and the Blue Ribbon Network. London Plan policies 4B.9 and 4B.10, which set out specific design requirements for tall and large-scale buildings, and are of particular relevance to the proposed scheme. These policies set out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor.

22 The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (Policy 7.1).

23 The surrounding area is a mix of residential, commercial and industrial uses. The character of surrounding buildings varies widely and includes the listed Royal Veterinary College to the west, St Mungo's House to the south, a range of industrial warehouses opposite, Georgian, Victorian and post war social housing, as well as some contemporary student housing and private residential buildings further north. The site is flanked by two conservation areas – to the east and west. Building heights in the area range from two to seven storeys, with the predominant character of heights between four and six storeys. The surrounding area, in particular along St Pancras Way, is undergoing change with a number of new taller buildings between six and seven-storeys having been recently permitted or completed.

Ground floor commercial use

24 The scheme proposes a large warehouse unit at ground floor, which runs the entire length of the site. The warehouse is seven metres tall and has been designed to house the existing Travis Perkins use, which presently features industrial scale sheds with blank elevations along the street frontage. The scheme provides an opportunity to improve the existing condition of the streetscape in this area, and the success of the street level environment is highly dependent on treatment of this ground level elevation, and the details of vehicle access in particular.

25 The applicant has undertaken some detailed design work to show how this elevation would be animated through its design, with materials including fence cladding that maintain the industrial presence of the business, but allowing views through to enliven the street and maintain surveillance. The detailed design of the frontages and the student accommodation entrances are important in ensuring that a high quality pedestrian environment is provided for users of the site and passers-by, given that it directly fronts a relatively narrow footway. The scheme is successful in animating the street front at the northern end, with its double height retail frontage and signage, with openings in the frontage. Improvements have been made to block D since pre-

application stage, and how it meets the ground has been refined to create some solidity rather than a floating plinth and continuous industrial frontage. The Council will need to ensure that these details are carried through to construction stage, through the imposition of appropriately worded conditions. At the southern end, and as detailed further below, there is a concern that there is little relief to the facade, resulting in a monotonous and overdominant presence in the street. It is accepted that given the function of the builder's merchant, that an industrial style ground floor treatment is appropriate, however at present further work is required to create more animation.

Student accommodation - layout

26 The student accommodation would be located above the warehouse on a podium deck. The building is arranged as four connected blocks, with the main three blocks stepping back from the road edge, and the fourth (D) comprising a perpendicular block fronting the road. At pre-application stage, the importance of breaking up the mass of the building and reducing a potential canyoning effect along the street was highlighted - this is a long narrow site with long range views afforded to it, particularly up and down St. Pancras Way. The step-backs that have evolved go some way to breaking up the imposing mass of the building onto the street, particularly at the northern end. In adopting this approach to layout, it has also enabled a series of amenity spaces on the podium roof of the warehouse building for use by the students, featuring a larger plaza type space and a more intimate amenity space at the northern end. These spaces are linked through an opening in block D, enabling links through but visual separation to be retained.

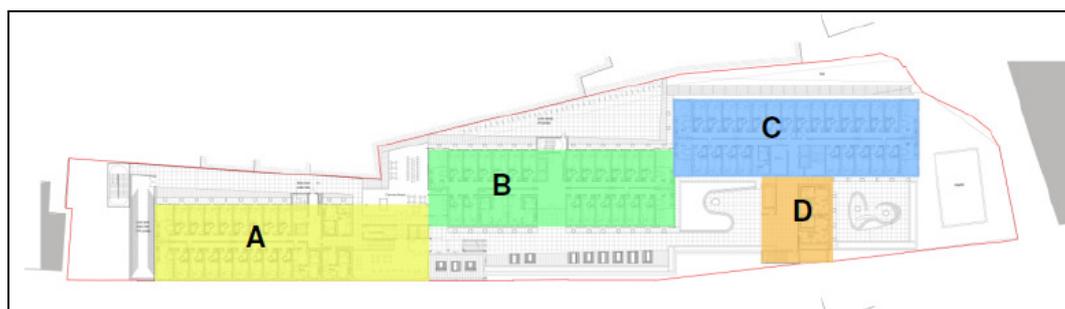


Fig 2: Block layout plan of buildings (source: submitted Design and Access Statement)

Heights

27 The building heights are staggered across the site. Heights increase from six and seven-storeys at the edges of the site, and step up to 11-storeys (the equivalent thereof) at the centre. The general principle of increasing the heights of the building from the edge of the site to the centre is broadly acceptable, as the centre is the least sensitive location, and it is that part of the site that could accommodate a taller feature.

Scale, bulk, massing and architecture

28 Whilst the principle of the building arrangement and the rationale for the location of the taller elements is broadly acceptable, concerns raised at pre-application stage still remain in relation to the overall bulk and massing of the building, and that it is out of scale with the surrounding area. In light of the significant height increases compared to the existing building and surrounding development, ameliorating its scale through design is important in ensuring that it has a positive impact upon the character of the area.

29 Due to the nature of the modular pre-fabricated system that is proposed, the ability to incorporate any significant variation or articulation to the building is restricted. Such a system only

allows limited depth and reveals to the facade, or variations to block design as design features, to be achieved. Such an approach also results in a monotonous and repetitive pattern to the fenestration, which further contributes to the imposing mass of the building.

30 It is acknowledged that the set-backs, podium decks, red box and curtain walling features, together with variations in size of some of the window openings that have evolved during the design process do go some way to breaking up this mass, particularly in views from the north, and this is welcomed. Concerns remain however, regarding the scale, bulk and massing particularly in views north along St. Pancras Way, Granary Way and also from Royal College Street to the west. The surrounding sites are within conservation areas, and exhibit a fine urban grain, with characterful buildings of a low to medium scale and it is questionable as to whether the scheme achieves a satisfactorily high level of architecture expected for a building of this scale in this context. It is also queried as to whether the depth of the reveals shown in the visualisations can be realistically achieved in light of the limitations imposed by the modular-system with its 'skin-like' facade treatment.

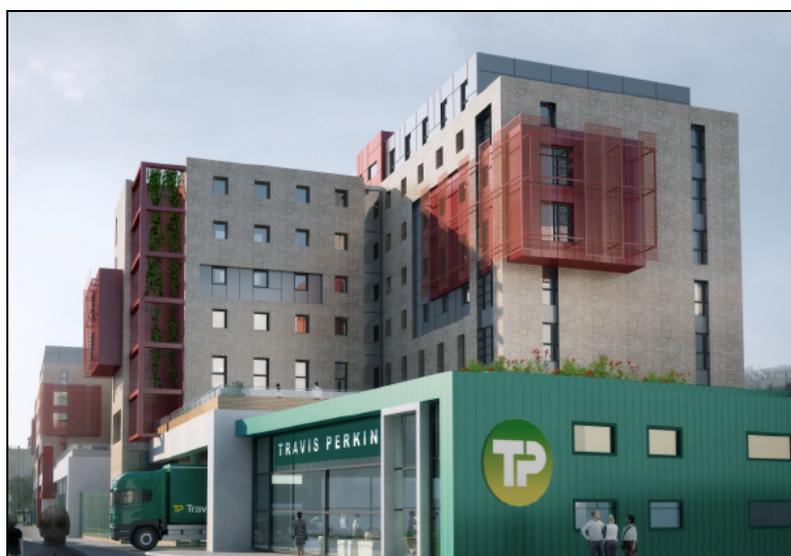


Fig 3: view from north down St Pancras Way (source: submitted Design and Access Statement)

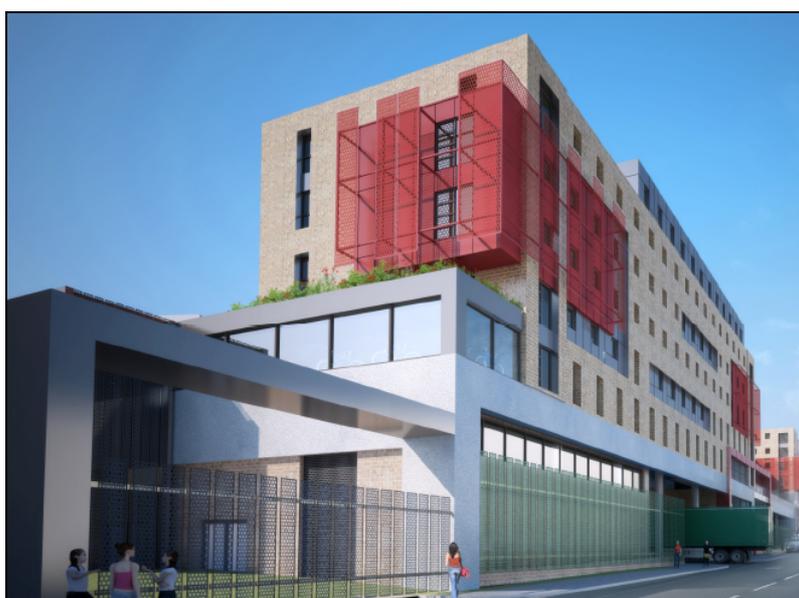


Fig 4: view from south up St Pancras Way (source: submitted Design and Access Statement)

31 In the views looking north in particular, the building appears particularly dominant in the streetscene, by reason of the length of the frontage, the repetitive fenestration and the block design. There are design changes that might assist in reducing this impact, including removal of the top floor of block A and introducing a stepped arrangement at the southern end. Again, due to the modular design, it is not possible to set back the top floor from the parapet in order to reduce its visual impact. As noted above, the length of the warehouse frontage and deck, with little relief or break in its expressed frame, exacerbates the canyoning effect of the building and impact upon the streetscene.

32 The view from Royal College Street, where the top floor appears particularly dominant, would also be improved through its removal. In relation to the Royal Veterinary College building to the west, the application documents contain little assessment of its relationship with, and impact upon this building, as requested at pre-application stage, and further details should be provided before the application is reported back at Stage 2.

Fenestration

33 The applicant has also previously been requested to look at varying and increasing the size of the windows on all elevations, including the ends of the blocks. This has been achieved on the gable ends, but there is a concern that the side elevations to block D, as well as the front elevation of the building still appear particularly repetitive, by reason of their size and regular pattern, and the scale of the development. The applicant has explained that the modular system and the nature of the use prevents the opportunity to create any signification variation in the openings. Again, it is queried as to whether the proposed modular design and treatment is therefore appropriate for a development of this scale, and is able to achieve the high design standards and architectural quality demanded by the London Plan.



Fig 5: Block A front elevation (source: submitted drawings by Bellis Cooley Architects)

Internal layout and quality of accommodation

34 The GLA does not have standards for student accommodation, however it is still important that, as a type of housing, that the scheme demonstrates that rooms will provide a reasonable level of habitation for students. It is acknowledged that student accommodation may be a more appropriate residential-type use given the ground floor use. The applicant explains that the podium decking assists in attenuating noise transfer from the ground floor use. It will also important that deliveries and servicing are managed in such a way that waiting on the street, for

instance, does not cause a noise nuisance for residents. Appropriately worded conditions will be necessary to ensure that noise, disturbance, and security, for instance, are managed accordingly.

35 The scheme features a range of bedroom types, from studio flats to cluster flats of between five and eight bedrooms. A common room, meeting area, and laundry are located at podium level, and the cluster flats on each level feature shared kitchen facilities and a small living space. Again, whilst it is noted that there are no design standards for student accommodation, there is a concern about the long corridors with lack of any natural light to them. The cluster rooms are all single aspect and have small windows in most cases. It is noted that the applicant was asked to explore the opportunity of extending these windows to full length, and it is disappointing that this has not been pursued. The size of the communal kitchen and living space for the cluster flats is also of concern and that it does not increase relative to the number of cluster flats. Given the size of the rooms themselves, it would be expected that more generous common rooms and break out space would be appropriate.

36 Overall, the quality of the scheme is considered to be poor, and overly utilitarian, largely derived from the nature of the modular-design system and scale of development.

Inclusive design and accessibility

37 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 4B.5 (Policy 7.2 in the draft replacement London Plan) is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum), the applicant should therefore seek to provide a scheme which is exemplary in terms of inclusive access. The design and access statement submitted with the application should therefore explain the design thinking behind the application and demonstrate how the principles of inclusive design, including the specific access needs of disabled people, have been integrated into the proposed development from the outset and how inclusion will be maintained and managed.

38 Educational establishments have a duty under the Disability Discrimination Act 2005 to ensure that their facilities and services are accessible for disabled students. There is currently a huge shortage of wheelchair accessible homes in London, and one of the biggest barriers to disabled students being able to live and study in London is access to suitable accommodation. In the spirit of equal opportunities and inclusivity, the ability to accommodate disabled students should be fully integrated into any student housing development. Separate or 'special' accommodation provision is not acceptable. The access statement should provide details of the availability of existing accessible student accommodation and what the current demand is for accessible accommodation and how future demand (which is expected to rise) will be addressed in the design of the proposed new units – i.e. how is future flexibility and adaptability being built into the design.

39 As an absolute minimum, such developments are required to meet Part M of the Building Regulations. For building regulations purposes, student accommodation falls into the same category as hotels and as such one in twenty rooms should be wheelchair accessible. However, given the shortage of wheelchair accessible student accommodation a higher provision is encouraged.

40 For London Plan purposes, specifically draft replacement London Policy 3.8, as a form of residential development ten per cent of student bedrooms should be wheelchair accessible or easily adaptable for occupation by a wheelchair user. Best practice standards as set out in the revised British Standard BS 8300: 2009 recommends that 5% of rooms are fully accessible (i.e. meet the

standards set out in the building regulations) and that 5% are capable of being adapted at a later date if needed (i.e. with more space to allow use of a mobile hoist, wider doors, walls capable of supporting grab rails and drop down support rails). Ideally the 5% fully accessible rooms should be designed so that they are capable of having a fixed ceiling track hoist installed if needed.

41 The applicant is proposing that 5% of rooms will be designed to be fully accessible, with six rooms (1%) being fully fitted out at construction stage and the rest being capable of adaptation when the need arises. The plans submitted in the access statement show 13 rooms that are fully accessible, together with three accessible kitchen/lounge spaces. It is unclear how this correlates to the 1%/5% provision. The location of the adaptable rooms are not indicated, and there is a concern that due to the size of the units, that it would not be possible to adapt the rooms, should the need arise. In order to address these points, large scale plans which demonstrate the 5% accessible rooms clearly showing what features will be provided from the outset and what will need to be retrofitted on request. A commitment to produce a full accessibility management plan that demonstrates how this will be achieved should also be provided.

42 It is noted that the one cluster flat with two bedrooms (at podium level) would, with some changes, make a suitable unit for a disabled person with a live-in carer, and further discussion on the ability to fit this out as fully accessible from the outset would be welcomed.

43 Otherwise, the scheme features level entrances, and dual lifts for each core, and routes to amenity areas and the podium are step free and accessible. There is a concern that the communal space for the cluster flats is constrained, and would restrict use by wheelchair users. Further discussion on this point is required before the application is reported back at Stage 2, and the commitments to providing an inclusive environment for students should be secured by condition.

44 The scheme should therefore be amended to show appropriate sized rooms (22 in total) that are capable of adaptation. A detailed bedroom layout plan, before and after adaptation, and annotated accordingly, should be submitted before the application is reported back at Stage 2.

45 The parking management plan should include a mechanism to ensure that the supply and demand of the blue badge bay is regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced.

Sustainability and climate change

46 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of, and adaptation to, the effects of climate change. Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this.

47 The corresponding policies in the draft replacement London Plan are set out in Chapter 5. These policies follow the same general approach with respect to the energy hierarchy but places greater emphasis on minimising carbon dioxide emissions and making use of decentralised energy systems and networks.

Energy – climate change mitigation

48 Policies 4A.4-11 of the London Plan require a reduction in a development's carbon dioxide emissions through the use of passive design, energy efficiency and renewable energy measures. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewable technologies.

Energy efficiency standards

49 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development, including energy efficient lighting and a building energy management system.

50 It appears that there is scope to reduce the need for space heating further as the insulation values of the fabric, as currently proposed, do not represent any improvement beyond 2010 Building Regulations minimum requirements. The applicant should explore opportunities to reduce the energy requirements (and carbon emissions) of the development through the use of further demand reduction and energy efficiency measures.

51 With the measures proposed, the development is estimated to achieve a reduction of 16 tonnes per annum (2.7%) in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant scheme.

District heating

52 The proposed scheme is located in the vicinity of existing and planned district heating networks. Therefore, connection of the proposed scheme to any of these heat networks should be prioritised.

53 There are two main heat networks that the applicant has considered. To the west of the rail network, a district heating scheme is currently supplying heat to customers in the King Cross St Pancras area. This heat network lies to the east of the Kings Cross railway network, whilst the proposed scheme lies to the west. There are no immediate plans to extend the heat network to the west of the railway network. Therefore, connection of the St Pancras Way development to this heat network is considered unviable at this stage.

54 More relevant to this application, are the plans for a new energy centre that would supply heat to buildings in the area and throughout the Euston Road area. The applicant, after liaising with the LDA, has concluded that connection of scheme to the Euston Road heat network is not viable as the proposed network is two to three years from completion. No information has however, been given about the phasing of the proposed development in order to be clear as to why this option could not be pursued in due course.

55 Whilst the applicant's initial investigations are welcomed, the opportunity to connect to this heat network should be pursued in liaison with the Council. Evidence of the correspondence between the applicant and the Council on this matter and details of the phasing of the scheme should be submitted to the GLA before the application is reported back at Stage 2.

56 In relation to the heating infrastructure proposed for the development, two separate heating systems are being proposed. The student accommodation will be supplied with heat and hot water using central plant. For the ground floor builder's merchant spaces, air sources heat pumps are being proposed. Given the layout and different nature of the student accommodation and the merchant spaces, this approach is accepted.

Combined Heat and Power (CHP)

57 The applicant is proposing to install a gas fired CHP unit of 140 kWe to supply the student accommodation building with space heating and hot water.

58 A reduction in regulated carbon dioxide emissions of 223 tonnes per annum (39.5%) would be achieved through this second part of the energy hierarchy. Officers note that the carbon savings that would be achieved with the CHP seem to be very high. The applicant should provide further information to clarify how these savings have been calculated, i.e. electrical efficiency of the CHP plant and proportion of heat provided by CHP.

59 Should connection to the planned district heating in the area prove unviable, and in order to reinforce the CHP proposals, the applicant should provide further information on the footprint and precise location of the energy centre.

Cooling

60 The applicant proposes to naturally ventilate the student accommodation spaces. Only the ground floor showroom and offices would require air conditioning. This would be provided with air source heat pumps.

61 The applicant should provide further information regarding the design measures adopted to prevent the student accommodation units from overheating.

Renewable energy technologies

62 As proposed, the renewable element of the proposed scheme would be provided by the use of air source heat pumps to supply the builder merchant spaces with heat and cooling.

63 A reduction in regulated carbon dioxide emissions of 0.65 tonnes per annum (1%) will be achieved through this third element of the energy hierarchy

64 The above figure represents a very small contribution from renewable and the arguments given by the applicant to discount the use of photovoltaic (PV) panels cannot be accepted.

65 The applicant should therefore evaluate the potential of using roof mounted PV to reduce carbon emissions further. Drawings showing the space available for the installation of PV and the carbon savings that this could be achieved should be submitted before the application is reported back at Stage 2.

66 In summary, the estimated regulated carbon emissions of the development are 343 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account. This equates to a reduction of 240 tonnes per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 41%.

Climate change adaptation

67 The London Plan promotes five principles in Policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribute to heat island effects; minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure (the corresponding draft replacement London Plan policy is policy 5.3). There are specific policies

covering overheating, living roofs and water. Further guidance on these policies is given in the Mayor's SPG Sustainable Design and Construction.

68 Policy 4A.11 and draft London Plan policy 5.11 seek major developments to incorporate living roofs and walls where feasible. Policy 4A.14 of the London Plan and Policy 5.13 of the draft replacement plan seek to ensure that surface water run-off is managed as close to its source as possible and sets out a hierarchy of preferred measures to achieve this. Policy 4A.16 of the London Plan and policy 5.15 of the draft replacement plan seek to ensure that new development has proper regard to the impacts on water demand and existing capacity by minimising the use of treated water and maximising rainwater harvesting.

69 The applicant has submitted an energy and sustainability strategy that sets out how the applicant intends to achieve a minimum BREEAM rating of 'Very Good'. A range of measures are proposed, including water saving devices, rainwater harvesting and lighting efficiency design. The applicant states that all flat roof spaces will be used to create green roofs for water runoff and biodiversity enhancement, which is welcomed, however the roof plan that has been submitted does not indicate the extent of these roofs and nor does the applicant confirm the use of sustainable urban drainage systems. In addition, noting the concerns above in paragraph 40 regarding overheating and cooling, further sustainability measures should be demonstrated and secured by way of conditions of any planning permission in order to accord with London Plan policies 4A.9 to 4A.14.

Transport

70 The site is located on St Pancras Way (A5202), which runs north to south linking Camden Road (A503) and Pancras Road (A5202). The nearest Transport for London Road Network (TLRN) is Camden Street (A400), 300 metres to the west. The nearest Strategic Road Network (SRN) is a different section of the A400, 700 metres to the north.

71 The nearest bus stops are approximately 170 metres away on the A5202, equivalent to a three minute walk, and serving bus routes 214 and 46. Mornington Crescent Underground station is located 600 metres away to the west, equivalent to a seven minute walk. Camden Town Underground station is located 850 metres north-west of the site, equivalent to an 11 minute walk. Both stations provide access to the Northern Line.

72 National Rail services are available from Camden Road Rail Station located 600 metres to the north east, equivalent to a 7 minute walk. St Pancras and Kings Cross rail stations are located 850 metres away to the south east.

73 The Mayor's Cycle Hire bikes are available from Royal College Street, located 250 meters to the south west of the site.

74 The public transport accessibility level (PTAL) ranges from 4 to the north and south of the site to 3 in the centre, where 6 is most accessible. This equates to a moderate to good level of accessibility.

Transport assessment

75 The submitted transport assessment (TA) does not accord with TfL's TA best practice guidance (April 2010). A multi-modal trip generation /distribution assessment is required in order to fully assess the mode split and forecast directional flows. Following submission of this information, a contribution to mitigate the impact of the development on the local bus and pedestrian/ cycle networks may be requested. It is acknowledged that the majority of trips will be student off-peak trips, however the applicant must demonstrate that there is sufficient capacity at

off peak times and therefore a table of trips generated between 10:00 and 16:00 is requested. This is to ensure compliance with TfL's TA best practice guidance (April 2010), London Plan Policy 3C.2 and draft replacement London Plan policy 6.3.

Cycling

76 The scheme proposes 286 cycle parking spaces for the student accommodation, together with 14 cycle parking spaces for Travis Perkins' employment and visitor uses. Whilst this level of provision is welcomed, the scheme does not meet the required tests of security, and accessibility and therefore fails to comply with the London Plan. Further discussion is required between TfL, the Council and the applicant to determine suitable locations for, and details of, the cycle parking.

77 In order to promote the expansion of the Mayor's Cycle Hire scheme and meet the Mayor's 5% mode share target, the safeguarding of land and a contribution of £132,000 and towards the installation, operation and maintenance of a 25-bicycle Mayor's Cycle Hire docking station is requested.

78 Following a TfL safety review of the facilities along the Camden Road, including the junction of Camden Road/St. Pancras Way, a contribution towards the implementation of any identified improvements is also requested.

79 Furthermore, it is recommended that a three-year collision study covering Camden Road, St Pancras Way and Pancras Road and their associated junctions is secured by the Council and a review of safety measures at the junction of St Pancras Way/Pancras Road is undertaken. Contributions to rectify any deficiencies to improve road safety at this junction may be required, and which should be secured through the s106 agreement.

80 TfL also encourages the applicant to consider an internal cycle hire scheme, similar to the student accommodation proposals at both Plot T6 within the Kings Cross masterplan area and Dexion House within the Wembley masterplan area.

81 Conformation of the above will ensure conformity with London Plan policy 3C.22 and draft replacement London Plan policy 6.9.

Walking

82 Due to the car free nature of the student accommodation it is assumed that the majority of trips will be made by walking, at least in the first instance, in order to access public transport.

83 A PERS audit and pedestrian comfort guidance assessment of the pedestrian environment in the vicinity of the site should be undertaken, focussing on routes to public transport access points. Any deficiencies should be highlighted so that an appropriate contribution can be calculated and secured through the s106 agreement.

84 As discussed at pre-application stage, Legible London is a way-finding initiative to encourage walking and a contribution towards this in the vicinity of the site is requested. TfL and Camden can provide more information, however a contribution of up to £10,000 a totem may be sought.

85 Within the site, a clearly defined pathway needs to be provided in order to facilitate internal pedestrian movements. Good design is encouraged to minimise interaction and improve safety between pedestrians and freight vehicles.

86 The above will ensure conformity with London Plan policy 3C.21 and draft replacement London Plan policy 6.10.

Car parking

87 The car free nature of the proposal including exempting students from the local controlled parking zone (CPZ) is welcomed and is in accordance with the London Plan, subject to being secured by planning obligation.

88 Further discussion is required with TfL in relation to the layout of the parking area. Not only would the staff parking layout block the safe movement of other vehicles using the parking bays, but the one disabled parking bay would be in conflict with servicing activity. Furthermore, the two proposed electrical vehicle charging points (EVCPs) are also not yet supported due to their location. Amendments to the parking layout are required to ensure conformity with London Plan policy 3C.23 and draft replacement London Plan policy 6.13.

Public transport network impact

89 The transport assessment should include an evaluation of the condition and accessibility of all bus stops within 400 metre walk of the site to promote inclusive accessibility to all users of the proposed development. Where improvements are required, TfL will request a contribution from the developer, usually in the region of £10,000 per stop.

90 It is understood that Camden Council has identified the area as having poor bus network accessibility, and is presently in discussion with TfL over improving the area's bus services. One option is running route 46 via a currently un-served road, Pratt Street, southbound. If this goes ahead it will provide better bus access to this site, and as such, a section 106 contribution towards a new stop and shelter on Pratt Street would be expected.

91 Route 214 has particularly high off-peak usage and is close to capacity. As previously requested a directional split of trips generated must also be provided in order to indicate which routes are affected and whether a section 106 contribution is required. This further assessment of bus patronage is needed to ensure conformity with London Plan policy 3C.20 and draft replacement London Plan policy 6.7.

92 In terms of managing the impact and distribution of trips, it is expected that the site would be occupied only by students enrolled on a full-time or part-time course within Camden or an adjoining Borough (where the provider of that course is funded by the Higher Education Funding Council for England). In order to ensure conformity with draft replacement London policy 6.1, this should be secured by condition or section 106 agreement.

Travel plan

93 The draft travel plan contains insufficient information to undertake an ATTrBuTE assessment. A full travel plan should be included at this stage, because the occupier's demographics of the proposed development are known. More information is required on how sustainable modes of transport will be promoted and how students will be encouraged to use these forms of transport. There is a lack of information relating to aims, objectives, monitoring and funding.

94 A full travel plan must be secured, enforced, monitored, reviewed and funded through any approved section 106 agreement. This will ensure conformity with London Plan policy 3C.2 and draft replacement London Plan policy 6.3.

Student management

95 The reference to the check in and checkout period within the management report is welcomed. A full student management plan, inclusive of the following recommendations in addition to a robust and comprehensive booking system, should be included as part of the full travel plan to be secured via section 106 agreement:

- Contingency plans are required should students arrive on site later or earlier than their allotted time due to unforeseen circumstances.
- Information should be available detailing nearby parking facilities for those parents who require a longer time period than their allocated slot. TfL requests that comprehensive travel information detailing the access routes to the residence (where possible avoiding Central London), parking and loading provision in the immediate locality inclusive of restrictions, length of stay and penalties and, in addition, information on the peak hours of traffic congestion is made available. This will ensure that users are discouraged from behaving in a manner which will cause any disruption to the local road network and encourage the use of public transport.
- The plan should be subject to annual review and if it is found that the staff provision / implemented procedures are insufficient then a larger number should be recruited and amendments made subsequently. This should be secured by condition.

96 This will ensure conformity with London Plan policy 3C.17 Tackling congestion and reducing traffic, 3C.2 and draft replacement London Plan policy 6.3 and 6.12.

Servicing and Delivery

97 Clarification is required regarding specific aspects of the swept path analysis to satisfy TfL that HGVs can operate safely within the unloading area. Further swept path analysis is required demonstrating that the largest expected servicing vehicle can safely operate when a vehicle is using the disabled parking bay.

98 It is recommended that the a cycle lift be included within the servicing bay in order to improve access to the 72 cycle space located on the ground floor. Segregation by design would be required to ensure that access to this lift is safe and that any conflict with servicing vehicles is minimised.

99 Subject to a delivery and servicing plan (DSP) being included within the travel plan, it is accepted that the servicing arrangements for the student accommodation can occur on street.

100 The DSP should seek to rationalise servicing with the aim to reduce the total number of trips made and to avoid critical times on the road network and should identify efficiency and sustainability measures to be undertaken once developments are operational.

101 The DSP relates to the end user and should be linked to the travel plan in line with TfL's new travel plan guidance.

Construction impact

102 A construction logistics plan (CLP) will need to be prepared in order to minimise highway and traffic impact to the highway network during the course of construction, in accordance with London Plan policies 3C.17 and 3C.25 and draft replacement London Plan policy 6.14.

This will need to be secured by planning obligation or condition, and prepared and approved prior to commencement of the development.

Section 106 contributions

103 As noted above, there are a number of areas for which TfL will be seeking mitigation following amendments to the application and submission of an acceptable transport assessment. These include:

- Bus stop improvements where required in the vicinity of the site
- Legible London wayfinding
- Appropriate pedestrian environment improvements
- Cycle hire docking station
- Cycle network improvements
- New bus stop to serve bus route 46 if re-routed.

104 Further discussion and collaboration is required between TfL, the Council and the applicant to determine the appropriate total section 106 contributions for transport for this scheme.

105 In summary, be reason of the lack of discussion and negotiation with TfL to date, the application does not currently comply with the London Plan. A number of issues are highlighted in this report for which further information and discussion is required in order to make the scheme acceptable in strategic planning terms.

Local planning authority's position

106 It is understood that Camden Council has a number of concerns with the scheme, in particular relating to the principle of the use, the quality of the accommodation, and the design and appearance of the building.

Legal considerations

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

Financial considerations

108 There are no financial considerations at this stage.

Conclusion

109 London Plan policies on the principle of development, student housing, urban design, inclusive design, climate change and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Land use:** This mixed use development is acceptable in principle; however order to comply with draft replacement policy 3.8G, the occupation of the student accommodation will need to be secured to an end user by way of section 106 agreement.
- **Urban design:** The proposal, by reason of the architectural approach, scale, bulk, massing, and detailed design, is inconsistent with London Plan policy 4B.1, 4B.9 and 4B.10.
- **Access:** The scheme has made effort to integrate inclusive design, however insufficient information has been provided in order to demonstrate that the scheme accords with London Plan policies 3A.5, 3D.7 and 4B.5.
- **Climate change mitigation:** The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole and the proposal is broadly acceptable, however, further information is required before the carbon savings can be verified and the scheme can be considered in accordance with London Plan energy policies.
- **Climate change adaptation:** Whilst the applicant's commitments are welcomed, further details are required to ensure that the proposal complies with the Mayor's Sustainable Design and Construction SPG and London Plan policies 4A.9, 4A.11 and 4A.14.
- **Transport:** The proposal, by reason of the lack of information and mitigation measures, fails to comply with London Plan transport policies.

110 On balance, the application does not comply with the London Plan.

111 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Urban design:** Further information and amendments to the scheme are required before the application is reported back at Stage 2 to address concerns about the bulk, scale, massing and architecture, as well as the internal layout and quality of the accommodation.
- **Inclusive design and accessibility:** Further information is required before the application is reported back at Stage 2 in relation to the design and layout of the accessible units that are proposed.
- **Climate change mitigation:** Further information and commitments are required before the application is reported back at Stage 2. The applicant should explore opportunities to reduce the energy requirements (and carbon emissions) of the development through the use of further demand reduction and energy efficiency measures and investigate options to link to future district heating networks. The possibility of using photovoltaic panels as a renewable energy source should also be explored further. Further information on how the carbon savings resulting from the CHP have been calculated, how the student accommodation would be prevented from overheating are also required.
- **Climate change adaptation:** The applicant is requested to provide further details of the extent of green roofs and sustainable urban drainage systems, together with how overheating and cooling of the accommodation can be achieved through passive design.

- **Transport:** Further information and discussion is required before the application is reported back at Stage 2. This relates to amendments to the parking layout, further details regarding the transport assessment, EVCP, details of cycle parking, pedestrian audits, bus stop audits and bus patronage, travel plans, servicing and deliveries, and construction logistics. Further discussion is also required in relation to an appropriate level of financial contribution to the Mayor's cycle hire scheme, wayfinding, bus stop and bus route improvements, together with conditions and other obligations to be secured as part of any planning permission.

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