

Planning Statement

Coal Drops Yard Pavilion



King's Cross Central
General Partner Ltd

July 2024

**KINGS
CROSS**

Contents

1.	Introduction	3
2.	Site and Planning History	6
3.	Proposed Development	12
4.	Pre-Application Engagement	17
5.	Planning Policy Context	22
6.	Planning Assessment	24
7.	Conclusion	41

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1. Introduction

1.1 This Planning Statement has been prepared on behalf of King's Cross Central General Partner Limited (KCCGPL) (hereafter: "the Applicant"), in support of a full planning application for a proposed new Pavilion building at Coal Drops Yard in Kings Cross, London, N1C 4DQ ("the site"). The application seeks to provide a new Pavilion structure within the existing yard, providing a total of 307sqm GIA of new commercial floorspace falling within Use Class E (a-b) under *The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020* which came into effect on 1 September 2020 (the "2020 Regulations").

1.2 The description of development is therefore as follows:

"Erection of new single-storey Pavilion building providing flexible retail/commercial unit within Use Classes E(a-b) and associated infrastructure, drainage and landscaping."

Background and the opportunity

1.3 The proposed development seeks to provide a new Pavilion structure which would provide a commercial unit within the southern part of Coal Drops Yard (also referred to as 'the Yard') that will serve to activate and bring greater vitality to a currently under-utilised and exposed space, acting as a landmark and meeting place for residents, workers and visitors to the area, whilst helping to drive footfall to and around the adjacent shopfronts throughout the day.

1.4 Coal Drops Yard is a converted former railway goods yard which is now, following successful refurbishment completed in late 2018, a shopping, dining and events destination. It sits within the King's Cross Central redevelopment, a masterplanned mixed-use redevelopment, providing 26 acres of public space across 10 new public parks and spaces and 50 new and restored buildings comprising 1,750 new homes and over 100 commercial spaces within the King's Cross Growth Area.

1.5 As part of its ongoing investment in, and stewardship of, King's Cross, the Applicant consistently reviews the function and customer experience of the Yard to ensure the estate remains an inviting, dynamic environment for all visitors. The proposal has evolved over the last 4 years and has been carefully considered alongside wider placemaking initiatives across Coal Drops Yard and is a key component of the placemaking strategy for the Yard.

1.6 The first phase of this placemaking strategy has already taken place through the delivery of a series of new wayfinding signs, landscaping and lighting within the Yard, as well as a series of audio speakers in Lower Stable Street. These interventions have responded directly to feedback from our customers that the Yard was dark and uninviting in some areas, shoppers felt disconnected from the shop frontages and navigation was difficult. These received planning, advertisement and listed building consent in August 2023 and have now been implemented.

1.7 The proposal for the Pavilion follows a significant period of design development, informed by pre-application discussions with Council officers, Camden's Design Review

Panel, key stakeholders and members of the public. The design proposals for the Pavilion provide a contextual approach connecting the Pavilion with neighbouring units and buildings and respecting the heritage of Coal Drops Yard, whilst also providing a sustainable contemporary addition to the space. The proposals represent a high-quality architectural approach, that preserves and enhances the heritage context of the Yard within the Regent's Canal Conservation Area. Sustainability has also been embedded at the core of the proposed design, with a strong commitment to circular economy principles in relation to materials and structure, as well as carbon reduction from both an embodied and operational perspective.

- 1.8 As such, the proposals are considered to provide significant planning benefits, including to further activate and increase vitality in the Yard, in line with wider placemaking objectives and strategy, and represent high-quality, sustainable, design that complements and enhances the Yard.

Content of the Application

- 1.9 The following documents have been submitted in support of this application:
- Planning Application form (including Ownership Certificates) prepared by Turley;
 - Planning Statement, prepared by Turley (this document);
 - Covering Letter, prepared by Turley;
 - CIL Form, prepared by Turley;
 - Site Location Plan, prepared by Fathom Architects;
 - A suite of existing and proposed plans/drawings for approval, prepared by Fathom Architects (see **Appendix 1** of the Cover Letter);
 - Design and Access Statement, prepared by Fathom Architects;
 - Statement of Community Involvement, prepared by LCA;
 - Heritage Statement, prepared by Malcolm Fryer Architects;
 - Sustainability Statement, prepared by Arup;
 - Delivery and Servicing and Refuse Strategy, prepared by Stantec; and
 - Fire Statement, prepared by The Fire Surgery.
- 1.10 This Planning Statement should be read alongside all documents submitted in support of this application.

Structure of Planning Statement

- 1.11 This Planning Statement is intended to assist the LPA in its determination of this planning application having regard to the requirements of the Development Plan, the National

Planning Policy Framework (the “NPPF”), Planning Practice Guidance (the “PPG”) and any other relevant material considerations. It evaluates the Proposed Development against local and national planning policies and carries out an overall assessment of the planning balance.

1.12 The remainder of this Planning Statement is structured as follows:

- **Section 2: Site, and Planning History** – A review of the site and its surroundings, including reference to any site-specific designations and its planning history;
- **Section 3: The Proposed Development** – A summary of the Proposed Development;
- **Section 4: Pre-application Consultation Summary** – A summary of the Applicant’s engagement at pre-application;
- **Section 5: Planning Policy Context** – A review of relevant Planning Policies contained within the National Planning Policy Framework and the Local Development Plan to the consideration of this proposal;
- **Section 6: Planning Assessment** – A detailed assessment of the proposals compliance with the adopted Development Plan and other material considerations;
- **Section 7: Conclusion** – A summary of the assessment and the public and planning benefits in the context of the overall planning balance and judgement.

2. Site and Planning History

Site Location and surroundings

- 2.1 The site is located within the London Borough of Camden ('LB Camden'). Coal Drops Yard sits within the 67 acre masterplanned King's Cross Central development, within which the Coal Drops Yard was developed and refurbished to form a new retail destination in 2016-2018.
- 2.2 To the north of Coal Drops Yard is Lewis Cubitt Square and beyond it, to the north of Handyside Street, Lewis Cubitt Park. Granary Square is located to the east of the Yard, with the Grade II Listed Granary Building, and connects through to the Yard via a ramp to the south of the site. Further to the north-west are the Grade II listed Gasholders.

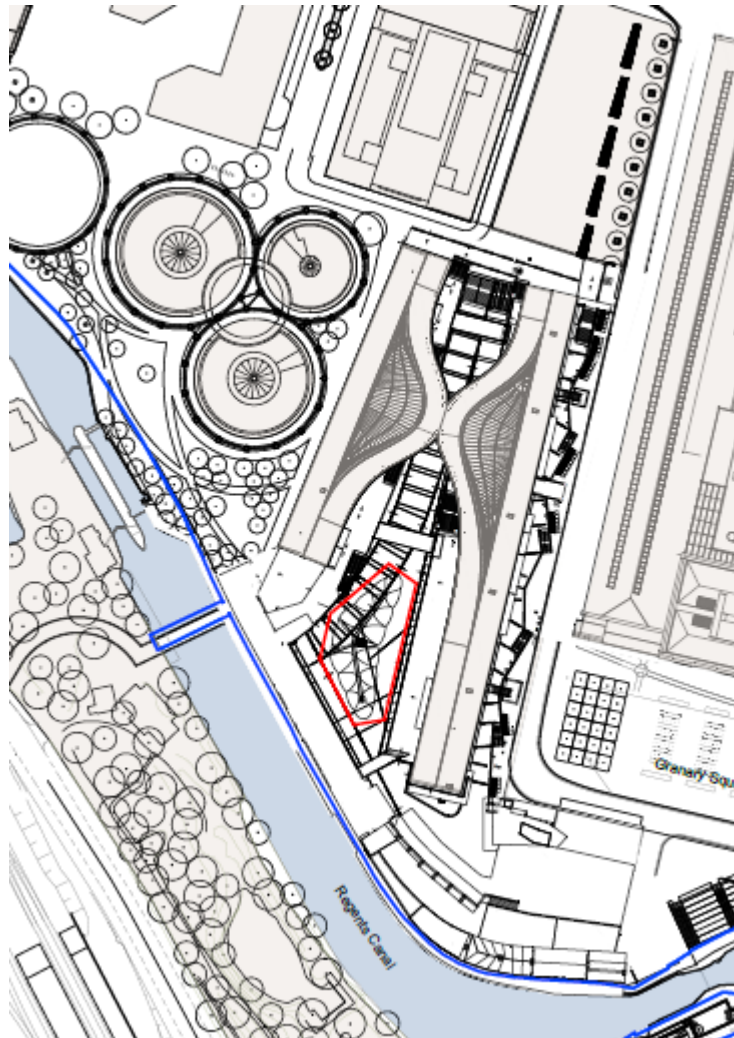


Figure 2.1: Site Location Plan extract, Fathom Architects

- 2.3 The Yard itself (where the proposed development site sits) is located between the eastern and western Coal Drops buildings – with the Eastern Coal Drops being Grade II Listed with the arches under Bagley Walk, including two which were opened up as part

of the refurbishment works, providing direct access to the Regent's Canal to the south. The north of the Yard sits underneath the merging roof structure, a landmark architectural feature of the 2018 redevelopment of the Yard, (often referred to as 'the Heatherwick ribbons' or 'the kissing roof') which links both the eastern and western roofs, whereas the south end is uncovered.



Figure 2.2: Aerial view of Coal Drops Yard looking north-west and showing the 'Heatherwick ribbon' roof form at the northern end

- 2.4 The site, the southern portion of the Yard, is currently a large open hard-landscaped space (of approximately 27m-35m wide at the mid and southern points) with commercial and retail units surrounding it, facing inwards at both ground level (Yard level) and on the upper viaduct levels (viaduct level). These include a variety of shops, cafés, and restaurants. The northern, largely covered, element of the Yard is often used for temporary events throughout the year. On the eastern side of the Eastern Coal Drops building is Lower Stable Street which also provides a range of retail and café units on both sides of the narrow passageway (5.8m wide), creating a more intimate shopping market street. The retail units in Coal Drops Yard are typically quite small, with 50no. of the 57 units being classed as 'small' units of 17 and 170sqm, 3no. 'medium' units (of a similar scale to the proposed Pavilion) between 260 and 350sqm, 1 no. 'large' unit of 730sqm and 3no. 'Anchor' stores of between 1,115 and 1,850sqm.
- 2.5 The site is well connected to public transport links with the transport hub of King's Cross and St Pancras Stations only a short walk away (c.7-9 minutes), providing a wealth of bus and train services operated by both TfL and London Underground services, as well as National Rail and international rail services. Whilst the rest of the surrounding area towards King's Cross, including Granary Square, benefits from a Public Transport Accessibility Level (PTAL) score of 6b, the highest on a scale of 0-6b, the Yard itself has a lower PTAL, reducing to PTAL 2 in parts.

Designations and Allocations

- 2.6 The site is subject to the following designations and allocations under the policies map that forms part of LB Camden's Development Plan alongside the Local Plan (2017):
- Regent's Canal Conservation Area
 - King's Cross Opportunity Area
 - Site Allocation 1- King's Cross Growth Area
 - Central London Area (CLA)
 - Flood zone 1
 - Archaeological Priority Area- Tier 2 (Regents Canal and Rail Infrastructure)
- 2.7 It is noted that in the draft New Local Plan (currently at Regulation 18 stage), the Yard has an emerging designation of a CAZ Retail Cluster.
- 2.8 In relation to wider and immediately adjacent heritage assets, the eastern Coal Drops building (immediately adjacent to the site, framing the Yard on its eastern side) is Grade II listed. Beyond that, to the east is the Granary Building (also Grade II Listed). To the north-west of the site, just beyond the Western Coal Drops are the Gasholder Triplets (Nos. 10,11 and 12) which are also Grade II listed, as is the now Gasholder Park (Gasholder no. 8) beyond. Further to the west, on the opposite side of the Regent's Canal are also the Locomotive Water Point and Lock Keeper's Cottage, both Grade II Listed.
- 2.9 The site is also framed by a number of additional non-designated assets that contribute to the Regent's Canal Conservation Area, including the Regent's Canal itself which runs to the south of the site and the Western Coal Drops, framing the Yard on the western side, and the Fish and Coal Offices and Wharf Road Viaduct, framing the Yard on its southern and south-eastern edge.
- 2.10 The statutorily Listed heritage assets and their relationship to the site is shown on the map below

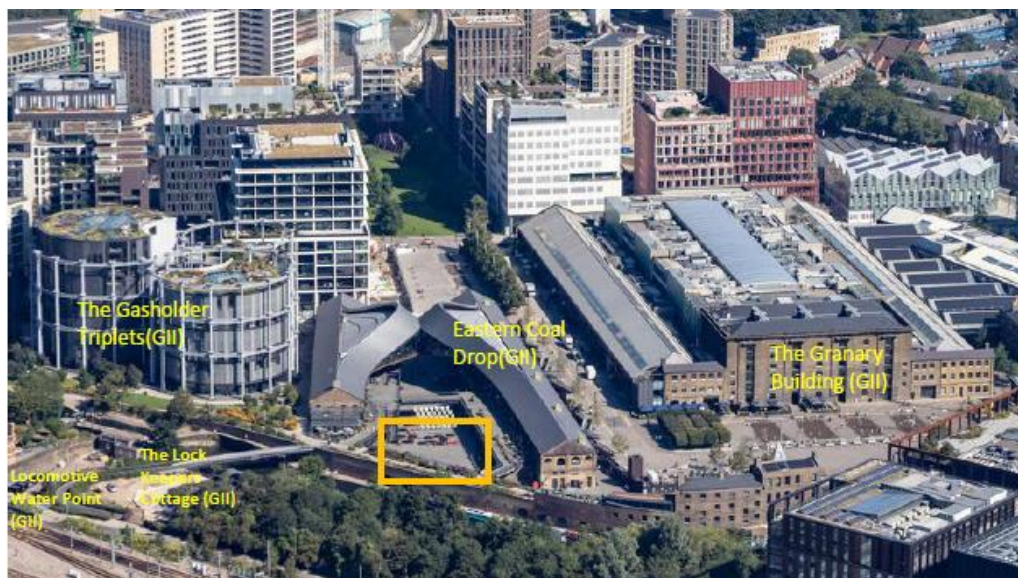


Figure 2.3: Location of Listed buildings in the context of the site (extract from Heritage Statement, Malcolm Fryer Architects)

- 2.11 The Regent’s Canal which runs to the south and west of the site is a designed Site of Importance for Nature Conservation (‘SINC’).

Historic Form of the Yard

- 2.12 The site and its surroundings have undergone a significant change as part of the King’s Cross Central redevelopment in the 2010’s, up to the opening of the Yard in 2018. Whilst the above sets out the current existing context of the site, the King’s Cross Goods Yard (now Coal Drops Yard), originally built in the 1850s has been subject to a number of piecemeal changes over time to various elements of the Viaducts, and Coal Drops that make up the site.
- 2.13 A more detailed overview of this history is set out in the enclosed Heritage Statement. This sets out a number of iterative changes prior to the recent redevelopment, reflecting the evolution of volume levels and technology behind coal distribution over time. However, the element that has perhaps most notably changed within the Yard space itself is that of the Plimsoll Viaduct and associated Bridge across the canal, which have both been demolished- the Bridge in the 1960s (following the closure of the coal depot) and the Plimsoll Viaduct in 2012 as part of the Kings Cross Central redevelopment. The Plimsoll Viaduct ran through the King’s Cross Goods Yard (now Coal Drops Yard), between the eastern and western Coal Drops, providing a strong structure that divided the open space of the Yard, creating more enclosed proportions to the space than is experienced today. It was first constructed in 1865 out of timber before it was replaced with a brick and reinforced concrete structure in the 1920s and rebuilt again in the interwar period, before finally being demolished in 2012, creating the current form and scale of the Coal Drops Yard.

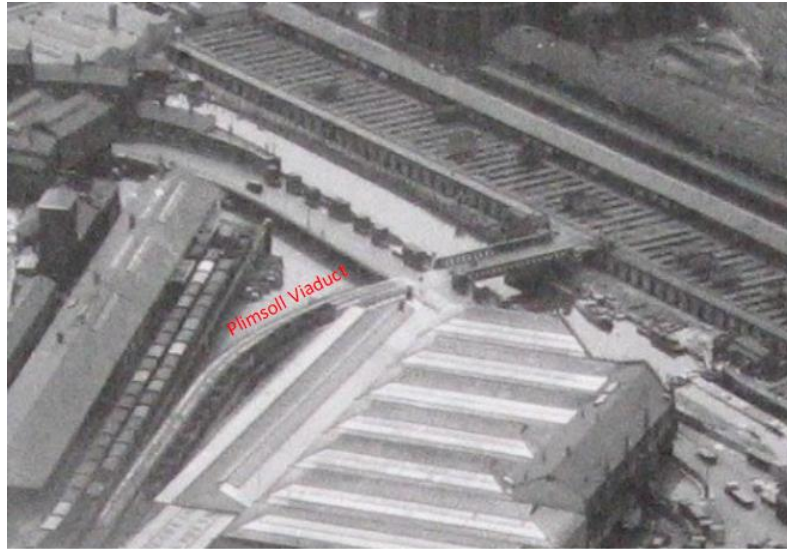


Figure 2.4: Aerial view of the Yard looking south c. 1960 showing the Plimsoll Viaduct through the Yard and connecting Bridge over the canal (extract from Heritage Statement)

- 2.14 This current form and proportions of the Coal Drops Yard is thus significantly enlarged in comparison to its historic scale as a result of the removal of the Plimsoll Viaduct, the historic alignment of which remains demarcated in the current paving configuration within the southern part of the Yard (where the site of the proposed Pavilion is located).

Planning History

- 2.15 Coal Drops Yard has a long planning history. This section will detail the most relevant applications to the current proposal.
- 2.16 The current layout of the site ('the Coal Drops Yard redevelopment') was granted planning permission in 2015, as part of the wider Kings Cross Central redevelopment. This included Reserved Matters Approval (ref. 2015/6018/P), Full Planning Permission (Ref. 2015/6045/P), Listed Building Consent applications (Ref. 2015/6016/L, 2017/6732/L, 2018/2566/L and 2018/3623/L) and an advertisement consent application (Refs. 2018/3622/A – linked to LBC 2018/3623/L, above) for works to the Eastern Coal Drops and its associated viaduct.
- 2.17 Later planning permission and listed building consent (2019/4509/P and 2019/4149/L respectively) were granted to further enhance public realm within Coal Drops Yard. This included lighting improvements, as well as a sound system and the installation of a limited number of external digital screens. A further application then followed for lighting and antennae to the adjacent Stable Street area (Ref. 2020/3110/P).
- 2.18 Notably, as part of the recent placemaking works referenced in the introduction of this Statement, planning permission, listed building consent and advertisement consent was granted in August 2023 for the installation of new signage, lighting and speakers (refs. 2023/2159/A, ref. 2023/2044/L and 2023/2159/A).

- 2.19 These recent permissions from August 2023 secured the first stage of wider public realm improvements, by improving the legibility and navigability around Coal Drops Yard as a shopping, dining and events location, and creating more engaging and better illuminated spaces within the Yard.
- 2.20 The current proposals seek to build on these initial public realm improvements, to create greater activity within the southern portion of the Yard space itself, further enhancing the function of this area of the site, and thereby the shopping and dining experience.

3. Proposed Development

- 3.1 The following section summarises the proposed development. The description of development subject of this full planning application is as follows:

“Erection of new single-storey Pavilion building providing flexible retail/commercial unit within Use Classes E(a-b) and associated infrastructure, drainage and landscaping.”

Use and Operation

- 3.2 Overall, the proposals will provide 307sqm (GIA)/ 323sqm (GEA) of high-quality commercial floorspace operating within *Use Class E(a-b)*. It is proposed that the space is operated as a single unit, however the unit has been designed with flexibility in mind, and there is the potential to divide the space to create two units, should this be required. This flexibility is to ensure the Applicant can continue to respond to changes in customer demand (see enclosed Design and Access Statement for details on tenant split options).
- 3.3 The unit will be accessed via the main entrance on its western side, with other secondary entrance/exit points to the north and south ends of the building where external covered seating spaces are located under the Pavilion’s overhanging canopy.
- 3.4 It is also proposed to provide additional seating and landscaping to create a dwell space on the eastern side of the building, which forms a key arrival point from the passage linking to Lower Stable Street in the east.



Figure 3.1: Proposed Site layout Plan, Fathom Architects

- 3.5 The proposal will provide a new unit for retail/ sale of food and drink. This is considered to provide a complementary use to the existing provision and uses within the yard, catering for an all-day offer for residents, workers and visitors. The uses therefore applied for are flexible Use Class E(a-b). The scale of the proposed unit is categorised as that of a 'medium' unit within the Yard context (260-350sqm) and this is also considered to represent a complementary approach to the existing offer within the Yard, given that only 3no. of the current 57no. units in the Yard are of 'medium' scale.
- 3.6 The typical hours of operation are proposed to be 8am-11pm on weekdays and 8am-11:30pm on weekends, in order to optimise the animation of the southern portion of the Yard by providing an offering for different times of the day, including during the morning period where there is currently less activity. Examples of the anticipated different functioning of the space throughout the day is set out further within the enclosed Design and Access Statement.

Design

- 3.7 Full details of the proposed design are set out further in the Design and Access Statement, however a summary of the key features of the proposed Pavilion is provided below.

Form and Layout

- 3.8 The form of the proposed Pavilion seeks to best utilise the space within the southern portion of the Yard to create 'streets' – clear walkway routes through and around the Yard, whilst also maintaining a sense of the openness of the Yard and retaining key views. The proposal creates routes around the Pavilion of an average of 9m wide, thereby creating wider 'streets' than that of the narrow Lower Stable Street (5.8m wide), providing a complementary rather than competing retail space and experience. As such, the more open feel to the Yard is appropriately maintained, with the built footprint of the proposed Pavilion only constituting 10.5% of the existing space within the Yard (see analysis within section 5 of the Design and Access Statement).
- 3.9 The ends of the Pavilion are cut-back underneath the canopy to provide covered spaces for seating and dining areas. An area of two solid bays on the eastern side, at the arrival point from Lower Stable Street, provides public seating and a dwell space through the provision of bench seating integrated into new fixed planters.
- 3.10 The structure of the Pavilion itself consists of a rhythmical approach of columns and arches created which mirrors the rhythm, shape and façade scale and height of the adjacent Eastern Coal Drops (and that of the neighbouring buildings more widely). The column and arch design has been developed with buildable geometry in mind, with a slight tapering of the columns as they ground to reflect a more elegant and lighter structure. The rhythm of the arches divides the key western and eastern elevations into thirds across the whole façade, with only the main entrance on the western side breaking this rhythm through the provision of a double-width, shallower arch, creating a clearly legible focal point and entrance.

- 3.11 These arches and main structure are then covered by an overhanging roof, the geometry of which reflects the arched rhythm of the façade, creating panelled segments to create an undulating roof form which further frame the arches as well as creating additional architectural interest that can be appreciated from viaduct level.

Appearance and materiality

- 3.12 The base structure, columns and soffits are proposed to be stained timber, creating a warmer tone, to create warmth, vitality and brightness at yard level, and contrast from the greys and darker shades in the surroundings, with the roof clad in a grey metal shingle tiles in a dragon-scale style. The overall palette created helps the roofscape tie into the granite and slate tones of the wider yard, whilst subtly referencing through the use of a similar tone, the bands of the Heatherwick ribbons/ kissing roofs which sit within its backdrop, thereby ensuring a hierarchy and not detracting from this key architectural feature of the modern Yard.
- 3.13 The majority of the bays are largely glazed shopfronts, with minimal introduction of solid timber panelled elements other than where necessary for back of house spaces, which then creating the eastern dwell space externally. This serves to ensure the structure is lightweight in its nature, whilst improving the sense of openness by providing lots of opportunity for glimpsed views through the structure and, importantly, creating a sense of activation of the frontages, contributing to vitality within the Yard. It also.
- 3.14 The shopfronts framed within the arch and column structure are simple design to be in keeping with other shopfronts in the immediate vicinity. They consist of a glazed top panel with a transom below, which acts as a strong unifier around the building and is sized to house an external blind mechanism where these are needed to the south-west of the building. Below this is a fixed glazing main panel in the main portion of the shopfront with openable side-hung windows either side for natural ventilation in the summer. A metal panelled stallriser at the base creates low level solidity but maintains the visual permeability at eye level and in views across the Yard, whilst appropriately considering the user experience once within the building and allowing for flexibility in the internal fit-out.
- 3.15 The solid shopfront element on the eastern side, at the arrival point through from Lower Stable Street, is clad in timber slats, reflecting similar heritage details around the Yard and the horizontal main transom is also expressed, continuing this solid line and consistency around the Pavilion, whilst also allowing for more widely spaced timber slatting to top panel area which would cover the louvred areas behind whilst allowing sufficient free area for the extraction.

Signage and Lighting

- 3.16 It is currently proposed to provide signage for the new unit both at fascia level on individual shopfronts, through internal signage above the horizontal transom line, and through projecting signage at appropriate locations near entrances to ensure legibility. It is also considered that there is an opportunity to provide wayfinding signage on the solid elevation on the eastern façade at the dwell space seating and landscaping.
- 3.17 The current proposals do not seek final details of the signage, which would subject to further consideration in future stages of design, but do seek to establish the key

principles of their indicative location and design approach which are set out in the Design and Access Statement. It is anticipated that any requirements for advertisement consent will be made at the relevant time once the detailed design is developed and tenant information is known.

- 3.18 Lighting is proposed to subtly illuminate the undulating roof of the structure to enhance appreciation of its architecture after dark) in a similar way to that of the ‘kissing roof’ following the 2023 placemaking upgrades application), though is more muted so as not to draw attention away from the showpiece architecture. Lighting is also proposed on each shopfront by way of subtle uplighting beneath each arch, and illumination to the solid panels adjacent to the eastern dwell space. The lighting would be warm white lighting, to match lighting in the wider Yard. Further details of the proposed lighting strategy is provided within the Design and Access Statement.

Landscaping

- 3.19 Landscaping and greening has been incorporated into the proposals through the proposed installation of planters at appropriate locations around the perimeter of the Pavilion. These include fixed planters as part of the proposed seating in the eastern dwell space, and moveable planters to delineate the southern covered seating area. The level of planting and landscaping is considered to be minimal to respect the former industrial nature of the Yard, ‘devoid of planting’, as set out in the Regent’s Canal Conservation Area Appraisal, whilst providing a proportionate amount of landscaping and greening to improve the feel of the Yard in the current day context, providing site users visual amenity and encouraging them to dwell whilst not unduly altering the character of the Yard.

Sustainability

- 3.20 Sustainability principles have been embedded into the core of the design from the outset and form a part of the Applicant’s ambitious commitment for the wider King’s Cross estate to be net zero by 2035.
- 3.21 In line with this strategy, the proposals seek to maximise carbon emission reductions. It is proposed that the Pavilion is connected to the main District Heating Network, which is subject to plans for decarbonisation by 2035. This is proposed to significantly reduce operational carbon emissions in the longer-term. Operational carbon emissions have also been reduced through building fabric energy efficiency and reducing overheating to ensure that the requirements for any mechanical cooling are reduced as far as possible. Natural ventilation has been maximised within the design whilst retaining the glazed character of the structure, with glazing values and external blinds on the south-western elevation proposed to reduce solar gains and minimise overheating. As such, natural ventilation will be the primary source of ventilation and cooling throughout the majority of the year.
- 3.22 The sustainability strategy for the Pavilion is also underpinned by a focus on reduction of embodied carbon emissions and promoting the circular economy. The proposal is targeting 95% of all construction and excavation waste to be diverted from landfill, as well as 75% municipal waste recycling during the operation of the Pavilion.

- 3.23 The circular economy approach and principles has also underpinned the approach to design and materials, considering durability over the life-cycle of the building. The use of steel within the building structure has been minimised, and where steel is to be used, it is to be in standardised sections to maximise reuse potential. The proposed Pavilion will aim to source the steel sections from nearby sites, from Argent's wider estate and from reclaimed steel brokers where efficient. A deconstruction plan and material passports will be produced and used as far as possible to aid end-of-life recovery of materials and components.
- 3.24 Further details are provided in the sustainability section of the planning assessment below, as well as the enclosed Sustainability Statement.

Transport, Access and Deliveries and Servicing

- 3.25 The proposed development is considered to contribute towards sustainable travel objectives given the good accessibility of the site and the active and passive measures within the wider King's Cross estate which promote the use of sustainable and active transport methods such as walking, cycling and public transport. The area in the vicinity of the site already provides a high number of cycle parking spaces and options through Sheffield stands, TfL cycle hire docks and dockless cycles to serve visitors to the site, with the recent redevelopment of the Coal Drops Yard also providing high quality long stay cycle parking for workers both at Coal Drops Yard, as well as private facilities for occupiers of each of commercial and office spaces in the wider area. Long-stay cycle parking provision for staff at Coal Drops Yard is already provided in secure and covered space along Lower Stable Street, as well as provision of showers and changing facilities, and would be available to staff of the proposed Pavilion in line with other units within the Yard. No further cycle parking is therefore proposed as part of this application.
- 3.26 The site is also accessed easily on foot from the ramp connection to the main route from King's Cross Station across the bridges over the canal and through Granary Square, and from the north via Lewis Cubitt Square as well as the canal towpath located to the south and west, connecting it to a wide range of public transport and cycle infrastructure.
- 3.27 The refuse store for the current Yard is located on the western side of the southern portion of the Yard. It is proposed to relocate this store underneath the viaduct on the Western Coal Drops, close to this existing location, so as not to disrupt pedestrian movement around the proposed pavilion. This is easily accessed from the new proposed unit as well as by servicing and collection vehicles for both the Pavilion and existing units. These vehicles will enter the Yard from the south, per existing arrangements, along the eastern side of the Yard via a route to the east of the proposed Pavilion (between the proposed Pavilion and the Eastern Coal Drops). A Delivery and Servicing and Refuse Plan is enclosed within this submission that provides further detail and swept path analysis of this route.

4. Pre-Application Engagement

- 4.1 Pre-application engagement is valuable for the evolution of a development, and it is recognised in the National Planning Policy Framework (2023) at paragraphs 39, 126 and 132 that it has the potential to improve the efficiency and effectiveness of the planning application process for all parties and to ensure that high-quality design is achieved that takes account of the views of the community.
- 4.2 The applicant has carried out a significant amount of pre-application engagement with various key stakeholders since the inception of the proposed development and over a significant period of time. This includes engagement with London Borough of Camden officers, Design Review Panel, local residents and businesses, Council Members/Councillors, and other local stakeholders. A summary is provided below.

London Borough of Camden Officers

- 4.3 The Applicant has proactively engaged with LB Camden officers, in relation to matters including planning, servicing, design, heritage and sustainability, as part of a thorough and collaborative pre-application process.
- 4.4 Initial engagement had taken place with the Council on the identified need to evolve the Yard and the key principles in November 2021. Since this time, several formal pre-application meetings have been held, including a review of the proposals by Camden's Design Review Panel ('DRP'). A summary of these meetings are provided below:
- **Initial informal meeting, LB Camden** (November 2021)
 - **Pre-application meeting No1, LB Camden** (February 2022)
 - **Pre-application meeting No2, LB Camden** (8 February 2024). Written response received 14 February 2024.
 - **Independent Design Review Panel ('DRP') – Site visit and meeting with the panel members** (23 February 2024). Written response received 08 March 2024.
 - **Pre-application meeting No3, LB Camden** (22 April 2024).
- 4.5 These meetings and the design development as a result of feedback received from both LB Camden officers and DRP members is summarised in greater detail within the Design and Access Statement at Section 3.
- 4.6 Whilst not exhaustive, the key points of feedback in relation to the key considerations as a result of these meetings and discussions are summarised below.

Principle of use and operation

- 4.7 LB Camden officers supported the proposed retail/ F&B 'grab and go' offer as an appropriate use for the site, noting that it would complement the Yard.

- 4.8 Officers also supported the single operator approach with the flexibility to sub-divide to create multiple units in the future.

Heritage

- 4.9 Camden officers raised no in-principle heritage concerns during the pre-application discussions.
- 4.10 However, the Conservation Officer did note that in earlier design iterations when the back of house was located to the western side of the Yard, the line of the Plimsoll viaduct was less easily appreciated due to the insertion of the Pavilion within the Yard. Similar comments regarding the Plimsoll line were also made by DRP. The proposals were subsequently developed further to flip the back of house to the eastern side. This resulted in a number of benefits (noted below), but principally ensured that the 'shadow' of the Plimsoll Viaduct line could run through the building internally at the front of the unit, which is the main entrance space, so that the 'shadow' can be readily appreciated both internally and externally by site users. It is proposed to also ensure that the final internal floor finish clearly demarcates the Plimsoll line accordingly.
- 4.11 Conservation Officers and the DRP also encouraged the design to consider the level of openness of the Yard, in the context of the historic approach and to ensure that key heritage views were maintained. These comments have been factored into the final design proposals in the following ways:
- Reduction in the footprint of the Pavilion through the cutting back of the ends by 5.5m to provide more open views through and around the site
 - Increasing the glazing and reducing solid, visually impermeable elements to allow for greater transparency
 - Further analysis of key heritage views (see the enclosed Heritage Statement Figure 24 for key views and full assessment of these) to ensure that these are not harmfully impacted
 - Further analysis of the historic openness of the Yard, demonstrating that the proposals result in only 10.5% of the current open Yard space and therefore result in significantly more open Yard space remaining (2,550sqm) than the historic context of the Yard with the Plimsoll Viaduct in place (1,545sqm). See section 5 of the Design and Access Statement for further detail on this analysis.

Form and Layout

- 4.12 The approach to the site layout with a single building and footprint was initially suggested by Camden officers during initial pre-application discussions and then supported throughout pre-app discussions. The layout and form has been rationalised and developed throughout the design process, informed by officer and DRP panel feedback during pre-application discussions. This has resulted in several reductions in footprint and floorspace, followed by a further final cutting back of the ends of the Pavilion to create open covered areas at either end. This is considered to lead to a more rationalised form and layout whilst maintaining openness, legibility and permeability.

- 4.13 Another key design change to the form and layout as a result of pre-application feedback was the re-location of the back of house area from the western side to the eastern side. This directly addressed feedback from DRP that expressed potential reduced vitality on the western side as a key route, in addition to activating a largely underutilised key area on the western side, this design move resulted in a number of other key benefits to the proposals, including:
- Maximising active glazed frontage by utilising the solid elements of the façade moved to the eastern side, and providing a more open, wide entrance including bi-fold doors at the western elevation that provides a welcoming point on this key western route around the Yard and to and from viaduct level;
 - Locating the main entrance away from the route taken by early morning servicing vehicles, enhancing the experience of users using the retail space in the early morning hours as is intended;
 - Allowing for increased appreciation of the Plimsoll Viaduct line through the open entrance at ground floor level and viaduct level; and
 - Utilising the proposed solid element on the eastern façade to provide a new public dwell space which doubles as the screening for the back of house elements and provides high-level louvres for extraction with minimal visual impact.
- 4.14 The geometry of the roof and the rhythm of the arches providing a contextual approach reflecting the Eastern Coal Drops was supported in principle by Officers at pre-application. It was queried by both Officers and DRP panel members whether the form of the roof could be rationalised and simplified further. Subsequently, the geometry was further simplified to the current proposal to reflect a more elegant roof form, serving as a ‘fifth elevation’ that worked with the rhythm of the arches below whilst also allowing for a shallower arch for the double-bay entrance area on the central section of the western elevation. The simplified form also provided functional benefits, improving buildability and maintenance of the proposals, as well as minimising any visual impact from MEP services.

Materiality and Appearance

- 4.15 The approach to materials and the proposed design approach to the Pavilion was generally supported by officers throughout pre-application discussions. Officers required the Applicant to consider in detail the roof materiality and form in terms of both appearance and functionality, which the proposals reflect.
- 4.16 DRP Panel members noted that glazing should be maximised where possible along the frontages to achieve a light-weight building structure akin to the traditional pavilion typology, and the glazing has been increased through design development and maximised, with stall risers reduced, as a result. This has also been carefully balanced against the requirements for ventilation and solar shading as well as the proposed use of the unit.

Sustainability

- 4.17 Both Officers and DRP Panel members supported a holistic approach to sustainability that prioritised a focus on circular economy principles both in relation to the materials used for construction as well the potential for de-mountability and future re-use of materials on the site. The design team developed a sustainability strategy at an early stage that places circular economy principles at its core.
- 4.18 Officers strongly encouraged the exploration of the use of timber and limited amount of steel, both to ensure that the Pavilion structure reads as more lightweight in appearance as well as using more sustainable materials. The final proposals have incorporated this feedback and sought to limit steel as much as possible.
- 4.19 Officers and DRP members also noted that the structure should be designed in such a way as to reduce the use of active cooling, encouraging solar shading and natural cross ventilation where possible. DRP panel members noted that awnings may not be the solution for the solar shading given the shape of the arches and this should be interrogated further. The sustainability strategy incorporates both natural ventilation and solar shading to reduce the need for active cooling, and the design incorporates blinds that are more in-keeping with the design proposals than awnings.

Key stakeholders and public consultation

- 4.20 Pre-application consultation with local stakeholders took place in May and June 2024.
- 4.21 Prior to the programme of public engagement, a stakeholder mapping exercise was undertaken which identified the relevant stakeholders who might take an interest in the proposals. Thereafter, the Applicant proactively sought to engage with these various stakeholders, brief them on the proposals for the Site and seek their feedback. This involved a series of meetings with stakeholders, including local councillors. The stakeholders that were identified and contacted included:
- Local Ward Councillors; Cllr Lotis Bautista, Cllr Jonathan Simpson MBE & Cllr Liam Martin-Lane
 - King's Cross Academy
 - Frank Barnes School for Deaf Children
 - Canal and River Trust
 - King's Cross retail forum
 - Neighbouring resident blocks representatives/managers (including Gasholders, Plimsoll and Tapestry)
 - Friends of Regent's Canal
 - Victorian Society
 - Historic England
- 4.22 In terms of wider consultation, the consultation included a flyer-drop to approximately 1,574+ addresses across the King's Cross estate (including residential and commercial/businesses), who were contacted about the proposals, setting out contact and feedback methods to share feedback, and invited to attend the public consultation events. The Applicant further hosted two in-person public consultation events on 30 May and 3 June at the Kings Cross Visitor Centre on Stable Street to showcase the plans, with

feedback collected via in-person conversations and physical feedback forms or digitally, subject to attendee preference. Individual meetings were also held with local ward Councillors as well as a number of stakeholders.

4.23 It should be noted that Historic England (HE) is not a statutory consultee for the purposes of this application, in accordance with the Guidance published by HE in 2019 which sets out when they should be consulted, which includes works to Listed buildings, the setting of Grade I or Grade II* buildings, or development of new buildings in a Conservation Area where the area of land in respect of which the application is made is more than 1,000sqm, which is not the case with this application. The current proposals therefore do not meet these criteria for consultation or referral. Whilst there is therefore no requirement to consult with HE, given their historic involvement in the King's Cross masterplan and the major refurbishment of the original Yard, the Applicant enquired through Camden officers who confirmed that there was no requirement for formal consultation. Notwithstanding this, the Applicant has ensured that HE have been notified and included as part of the stakeholder consultation process, providing details of the proposals and inviting them to view the consultation boards and website.

4.24 In summary, the key actions carried out are summarised as below:

- A flyer sent to 1,574+ local residents and businesses, inviting them to attend public exhibition events and view the website
- Two in-person public exhibition events, attended by 60 people
- Notifications sent via King's Cross estate's internal channels of engagement
- Physical and digital survey, which was completed 12 times
- Emails sent to 43+ stakeholders across the King's Cross neighbourhood
- Four stakeholder meetings held
- 114 views to the project website

4.25 The proposals were generally received well and supported in terms of both principle and design, with feedback received on the type of accessible occupiers needed in the new Pavilion and what type of retail offers residents would like to see across King's Cross estate more broadly, and acknowledgement that the Pavilion was an exciting opportunity to improve Coal Drops Yard. Feedback is summarised in greater detail in the enclosed Statement of Community Involvement.

4.26 The Applicant is committed to maintaining ongoing engagement with the various stakeholders to continue to shape the future for Coal Drops Yard.

5. Planning Policy Context

Development Plan and national planning policies

- 5.1 Planning legislation, namely *the Town and Country Planning Act 1990, s70(2)*, requires that proposals should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Consideration of compliance with the Development Plan is required for all applications, and it is the responsibility of the decision maker as to how weight is applied, or to any other material considerations.
- 5.2 The Development Plan for LB Camden comprises:
- London Plan (2021);
 - Camden Local Plan (2017);
 - Camden Site Allocations Plan (2013).
- 5.3 Relevant policies from each of these policy documents is discussed in **Section 6**.
- 5.4 The Council is also currently in the process of updating their Local Plan. The Council consulted on the draft new Local Plan, Regulation 18 stage, from 17 January to 13 March 2024. The Council is currently considering the responses received and the next draft of the Local Plan, Regulation 19, is currently being prepared and is likely to be consulted on later in winter 2024/ spring 2025. As such, emerging policy and designations hold limited to no weight, but will gain weight as the plan is submitted to the Secretary of State and proceeds to Examination in Public, expected in winter 2025.
- 5.5 Both the Mayoral and Camden Supplementary Planning Documents and Guidance also form material considerations in this regard. Specifically in regard to this application, those most relevant are:
- Camden CPGs:
 - Access for All CPG (2019)
 - Design CPG (2021)
 - Energy Efficiency and adaptation CPG (2021)
 - Public open space CPG (2021)
 - Town centres and retail CPG (2021)
 - Mayoral SPGs and LPGs:
 - Accessible London SPG
 - Planning for Equality and Diversity in London SPG
 - Optimising Site Capacity: A Design-led Approach LPG
 - Fire Safety LPG (draft)
 - Whole life carbon LPG
- 5.6 Specifically in regard to this application, the Regents Canal Conservation Area Appraisal and Management Plan (2008) is also a material consideration.
- 5.7 National planning policy is contained within the National Planning Policy Framework (“NPPF”) (December 2023). This is a material consideration of significant weight,

alongside the National Planning Policy Guidance that supports it (updated 2020), which also includes the National Design Guide (2019).

- 5.8 Substantive material considerations also must be taken into account by the Council as a decision maker. They act as material considerations in their own right, and include planning benefits that would arise from the proposed development. This may include social, economic or environmental benefits.

6. Planning Assessment

- 6.1 This section assesses the proposed development against key planning policy considerations at national, regional and local level as well as other relevant material considerations.
- 6.2 At the heart of the NPPF and National Planning Practice Guidance is the presumption in favour of sustainable development (Paragraph 11, NPPF) which states that consent should be granted 'without delay' where proposals accord with the Development Plan.
- 6.3 The compliance of the proposals with the Development Plan are fully assessed throughout this Section of the Statement.

Principle of Development

- 6.4 The site is located within the Kings Cross Growth Area which **Local Plan Policy TC1 (Quantity and location of retail development)** notes as accommodating approximately 30,000sqm net additional retail floorspace across the lifetime of the Plan. The majority of this floorspace has been brought forward as part of the wider King's Cross Central redevelopment and therefore retail provision and growth is supported in principle in this location, in line with **Policy TC1**. Specifically in this area the retail growth is noted as being similar to a town centre *"to meet the needs of the large numbers of people who will be living, working or visiting the area"* (paragraph 9.6 of the Local Plan). It is also further noted that the emerging New Local Plan (Regulation 18 consultation draft) provides a draft designation for the Yard as a CAZ Retail Cluster, further supporting continued retail growth in the Yard.
- 6.5 Therefore, it is considered that the principles of the proposals to provide specifically Class E (a-b) uses to provide for a retail/ grab and go food and beverage unit(s) for local workers and visitors, aligns with both current policy and emerging draft policy aspirations for continued retail growth in this location.
- 6.6 **Local Plan Policy E1 (Economic Development)** states that the Council will support businesses of all sizes and maintain a stock of premises that are suitable for a variety of business activities and recognises the importance of other employment generating uses including retail.
- 6.7 Similarly, **Policy TC2 (Camden's centres and other shopping areas)** seeks to protect and enhance the role and unique character of each of Camden's centres and provide for and maintain, a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice. It also specifically notes that food, drink, entertainment and other town centre uses are to be focused in King's Cross and Euston Growth areas.
- 6.8 The proposed Pavilion not only therefore provides a use that is considered acceptable in principle in this location, but also provides a unit size that complements the existing units within Coal Drops Yard, thereby enhancing the existing stock to provide a range of premises for business activities, in accordance with **Policies E1 and TC2**. Analysis of the existing retail and restaurant uses within Coal Drops Yard demonstrates that of the 57

units currently within the Yard, the majority (50 no.) are considered ‘small’ units of between 17-170sqm, with only 3no. ‘medium’ units, ranging between 260-350sqm, of a similar scale to the proposed Pavilion. As such, the provision of a further ‘medium’ unit with the Yard is considered to provide additional range and flexibility of retail space, in line with both the market requirements of the Yard, as well as policy aspirations.

- 6.9 As such, the proposals are considered acceptable in principle in this location, subject to design, heritage and other planning considerations, and which will be considered in turn below.

Design

- 6.10 **Chapter 11 of the NPPF** provides guidance on making effective use of land. **Paragraph 123** not only seeks to promote a more effective use of land, but also requests that a clear strategy is provided “*for accommodating objectively assessed needs in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*”. These aspirations are shared by the London Plan (i.e. **Policy GG2 – Making the best use of land**), which requires re-development proposals to demonstrate how they make effective use of the site, including in terms of layout, height, bulk, massing and floorspace provision, as well as the public benefits they deliver. **London Plan Policy G3 (Optimising site capacity through the design-led approach)** also sets out that development must make the best use of land by following a design-led approach which includes consideration of form and layout, experience and quality and character.
- 6.11 At a local level, **Local Plan Policy D1 (Design)** sets out that the Council will seek to secure high quality design in new development that meets a number of criteria, including (inter alia) respecting local context and character in relation to details and materiality also, preserves or enhances the historic environment, is sustainable, integrates well with surrounding character, maximises opportunities for greening and preserves strategic and local views.
- 6.12 Further details on the approach to the design and how it represents high-quality is set out in the enclosed Design and Access Statement. However, the below table provides a brief summary and overview against each point set out under **Policy D1**.

Policy D1 Design criteria	Assessment of the proposals
a. respects local context and character;	The proposals have been heavily informed by the existing local character of the Coal Drops Yard. The design strikes a balance between contextually referencing the historic character of the adjacent Coal Drops, particularly at ground floor level, through the elevation design with its scale and rhythm reflecting the prevailing pattern and symmetry of the adjacent arches of the Eastern Coal Drops, as well as the more contemporary elements of industrial character that have been introduced into the Yard through the refurbishment and development scheme of Coal Drops Yard and the Heatherwick ribbon, through the undulating fluidity of the roof structure. The materiality choices also reference Coal Drops Yard materials with timber commonly

used in the Yard historically and the grey tiled roof referencing the surrounding buildings. The proposed design therefore reflects the local context and character and represents high quality design as set out further in the supporting text to this policy at paragraph 7.2-7.5.

b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;

Consideration of the historic environment has been a key driver to the proposed design. Further assessment of this is set out in the assessment of **Policy D2** (heritage), below, as well as in the enclosed Heritage Statement.

However, in summary, the design is considered to respect, preserve and enhance the historic character of the Coal Drops Yard, the Regents Canal Conservation Area, and the setting of the nearby Grade II Listed buildings, including the group value of the immediate context. The current setting of these heritage assets is both within their historical context as well as within a transformed public urban environment.

The significance of these heritage assets and the Regent's Canal Conservation Area Appraisal has guided the design development to create a design language that relates sensitively and contextually to the form, scale and materiality of the various surrounding elements. The proposals relate directly to the grid lines and segmental arched forms of the surrounding viaducts, along with the materiality of the existing roof and lighter timber cladding elements of the Conservation Area and immediate context. The proposals have also sought to better reinforce the *'sculptural quality of the urban spaces between the existing buildings on the site'*, as described in the Conservation Area Appraisal.

The proposals also give prominence to, and celebrate, the line of the historic Plimsoll viaduct in the yard whilst also reinstating massing and the more intimate historic urban grain to the Yard, creating a more appropriate sense of scale that also reflects the previous historic context of the Yard, and reflecting the lighter structure of the original timber Plimsoll viaduct through both architectural form and materiality. The undulation of the roof also reflects the subtle level changes in the original Plimsoll Viaduct.

Key views were closely analysed by the design team and the Heritage Statement sets out how the design approach preserves and enhances these by reinstating a sense of the lost scale on the ground plane whilst also enhancing the wider views of the Goods Yard from the upper levels without interrupting them.

The Heritage Statement concludes that the proposals address the significance of the designated and non-

	<p>designated heritage assets through an appropriate but distinctive contemporary architectural language which references the forms and materials of the immediate heritage setting. The carefully developed scale and form of the pavilion has sought to relate sensitively to the surrounding heritage assets whilst reinstating a more intimate sense of scale that reinforces the historically complex interrelationships between the group of buildings at yard and viaduct levels.</p>
<p>c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;</p>	<p>Full details of the sustainability approach are assessed below in the relevant section of this Statement, and also set out in the accompanying Sustainability Statement.</p> <p>The proposals embed sustainability at the core of the design approach, with a focus on the circular economy through materiality. The timber-first design approach reduces the need for more carbon-intensive materials and the use of steel has been reduced as far as practicable within the structural design. The development also proposes to use reclaimed and recycled materials where possible, as well as use material passporting to help facilitate re-use of the materials in the future should the Pavilion be demolished. From an operational perspective, carbon reduction measures are incorporated through the possibility for natural ventilation in the summer as well as connection to the DHN, which is currently undergoing a decarbonisation plan as part of the Net Zero target for the whole of the Kings Cross estate by 2035.</p>
<p>d. is of sustainable and durable construction and adaptable to different activities and land uses;</p>	<p>Whilst maximising of material passporting and potential re-use of materials has been safeguarded for the future, the Pavilion is not proposed to be a temporary structure and has therefore been designed with durability and climate change resilience factored in. The Pavilion is constructed using durable materials such as zinc roofing and aluminium framed windows, and the timber components detailed to avoid damage from water. The Pavilion has also been designed to allow for future tenant flexibility, to account for changing needs and demands to further enhance its longevity and adaptability.</p>
<p>e. comprises details and materials that are of high quality and complement the local character;</p>	<p>The architectural detailing and materiality has been carefully considered to both complement the local character as well as providing an attractive and interesting building.</p> <p>The timber frame columns and solid areas, are considered to provide both a solid structure and grounding of the building that reflects and complements the surrounding context, whilst providing a warmer tone to contrast with</p>

the areas of glazing, and adopting a more sustainable approach.

The roof materiality and architectural expression has been carefully considered and has been thought of as the buildings' "5th elevation" throughout its evolution, given its prominence when viewed from the viaduct level and Bagley Walk. The geometry of the roof form has been carefully considered to reflect the rhythm of the arches beneath whilst also creating a soft undulation that creates visual interest and integrates with (but does not seek to compete with) the Heatherwick ribbons of the main Coal Drops Yard. The resultant panels are proposed to be clad in metal dragon-scale style shingles in grey to reflect the existing colour palette of the yard whilst also providing texture.

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;

The principal intention of the Pavilion is to enhance the user experience and movement throughout the site, by creating more legible and easily recognisable routes and "streets" that connect to the wider area, whilst also directing pedestrian footfall to the existing retail frontages, enhancing vibrancy and vitality.

The provision of the Pavilion will bring back some built structure to the yard, which historically had the Plimsoll Viaduct within the western part of the space, whilst also maintaining an appropriate level of openness. The insertion of the Pavilion is considered to provide more appropriately scaled pedestrian "streets" for all site users to enjoy whilst also providing open spaces in the form of dwell spaces, such as the landscaped seating space along the eastern edge of the proposed Pavilion and under the seated canopies, and allowing the northern part of the yard to remain as an open space for events and other activities.

The design has also considered the key arrival points to the southern portion of the Yard, providing clear arrival points at each end that welcome visitors and provide clear direction for movement. The dwell space opposite the arrival point from Lower Stable Street also allows for an appropriate scale of transition from Lower Stable Street whilst providing an opportunity, on the solid element, for wayfinding signage.

The location and design of the main entrance to the Pavilion on the western side is also clearly delineated through its extended form and visibility, which including a bi-folding element to provide further activation to the western side of the Yard, as well as a clear focal point across both levels of the Yard and easy access to and from the Viaduct level, being located in front of the steps.

	<p>The elevations are also designed to contribute positively towards the new ‘streets’ created and create an active frontage, by providing a high ratio of glazing to solidity, enabling active shopfronts to add to the vitality of the yard as well as increasing visual permeability, allowing for glimpsed views of the surrounding buildings from within and around the Pavilion as noted above. The outdoor seating areas at either end of the Pavilion, as well as the dwell space and seating on the eastern elevation, further provide activation, visual interest and vitality to the public realm.</p>
g. is inclusive and accessible for all;	<p>The proposals maintain level access throughout and the building complies with the relevant requirements of Part M of the Building Regulations Approved Document.</p> <p>The incorporated dwell space which includes public seating on the eastern elevation is not associated with the operation of the unit and is therefore considered to foster further inclusivity by providing rest points for all users of the space, including the elderly, those with disabilities or with pushchairs. The width of the route to be created between the Pavilion and the Eastern Coal Drops is also in excess of highways guidance for pavements to allow for wheelchairs and pushchairs to pass each other.</p>
h. promotes health;	<p>Coal Drops Yard is a key area for social cohesion and leisure, and connects through to a number of walking and cycling routes including the Regent’s Canal towpath and Bagley Walk. The Pavilion is considered to promote wellbeing by encouraging social activity in the southern portion of the Yard and, through the creation of ‘streets’, the improvement of key pedestrian routes and users’ views.</p>
i. is secure and designed to minimise crime and antisocial behaviour;	<p>The introduction of the Pavilion is considered to create a less sparse feeling to the yard and encourage greater use of the space, thus aiding in crime prevention through increased activity and surveillance. The high volume of glazing reduces the potential for blind spots and increases active and passive surveillance. The space will also continue to be managed by the Kings Cross Estates Management team as with the rest of the estate.</p>
j. responds to natural features and preserves gardens and other open space;	<p>The existing yard does not currently have any natural features or landscaping in this area to respond to and this is considered a key component of its character in the Regents Canal Conservation Area Appraisal, which refers to its industrial and ‘mineral’ quality ‘devoid of greenery’. As such, the proposals seek to preserve this character and balance it with light-touch landscaping and greening around the Pavilion to introduce a limited quantum of natural features. The proposals also seek to improve and</p>

	encourage greater use of routes between the Yard and the neighbouring areas with more natural features including the Regent's Canal, Camley Street Natural Park beyond it, and 'greener' character areas around the King's Cross estate including Lewis Cubitt Square, Bagley Wharf and the Gasholder park, therefore encouraging their continued use.
k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,	The proposals seek to integrate with wider landscaping initiatives, and directly seek to introduce further landscaping and planting as part of the Pavilion's design, optimising opportunities for this within the limited footprint of the building, whilst still maintaining the industrial nature of the yard. The landscape elements that are included in the proposals are strategic and minimal to reflect the industrial, mineral quality of the Conservation Area Sub Area which was ' <i>devoid of planting</i> ' but serve to provide important edge treatments and opportunities to dwell with the benefit of small-scale greenery. Further detail is provided in Section 6 of the Design and Access Statement and in this Statement, as below.
l. incorporates outdoor amenity space;	Not relevant to these proposals, however the Pavilion design does incorporate amenity space through the covered seating areas at either end of the Pavilion, as well as the public seating and dwell space on the eastern elevation.
m. preserves strategic and local views;	An assessment of key views is provided within the Heritage Statement from a heritage perspective and key visuals of views within the Design and Access Statement. There are not any strategic or local views designated on the site, however the views selected have been selected in relation to the human scale experience of the site and appreciation of both the structure and the wider yard from its two key 'levels'; ground floor (yard) level and viaduct level, as well as in relation to key heritage views.
n. for housing, provides a high standard of accommodation; and	Not relevant to these proposals
o. carefully integrates building services equipment.	The incorporation of the building services, MEP and plant and back of house space for the unit has been carefully considered from a design perspective. All services are consolidated into a single area on the eastern side of the building, allowing for a wide and inviting entrance on the western side - thus responding to the existing context, desire lines and activating the western side of the yard, as well as highlighting the Plimsoll viaduct as noted above - and also creating a solid back in the 'kink' in the façade adjacent to the arrival from Lower Stable Street. This

provides a welcoming arrival point and dwell space at a key junction, from Lower Stable Street. The location for the plant and back of house was informed during design development in the pre-application stage, as a response to officer and DRP comments, having previously been located on the western side.

Furthermore, the external manifestation of the plant has been carefully integrated into the roof structure and the solid elements of the façade design (with louvring disguised within the solid eastern element) so as to both mitigate against any extract at public realm level, and also to provide an elegant solution that minimises disruption to appreciation of the arches and roof form when viewed from viaduct level. This view and further details on the MEP design are provided within the Design and Access Statement (MEP strategy and details at Section 8).

6.13 As per the above assessment, and the further details provided in the Design and Access Statement, it is considered that the proposals represent high quality design, in compliance with Camden’s design policy.

6.14 Specific areas of design with further individual policy requirements are further addressed, below.

Shopfront design

6.15 **Local Plan Policy D3 (Shopfronts)** notes that the Council will expect a high standard of design in new shopfronts and will consider the design including details and materials, existing character and relationship with surrounding properties, general characteristics of shopfronts in the area, safety and natural surveillance and accessibility.

6.16 As per the assessment in the table set out above, the proposals provide new shopfronts that are considered to represent high-quality design through the reflection of the surrounding context and character of the existing shopfronts within the adjacent Coal Drops, in terms of rhythm and scale. The key elements of the shopfronts have been carefully considered both in terms of contextual reference (including the horizontal transom line) and functionality (through the openable sections for ventilations and flexibility of use provided by the stallrisers), as well as preserving transparency and permeability through the predominantly glazed shopfront bays. The shopfront bays also provide active frontages and vitality to the public realm as well as increasing passive surveillance of the new ‘streets’ to be created. As such, the shopfront design is considered to be in accordance with **Policy D3** requirements.

Signage and Advertisements

6.17 **Local Plan Policy D4 (Advertisements)** sets out that advertisements must preserve the character and amenity of the area and preserve or enhance heritage assets and conservation areas. It also notes that advertisements should not contribute to an unsightly proliferation of signage in the area, contribute to street clutter or cause light pollution to nearby residential properties or impact public safety. It is noted that the

Council will resist flashing illuminated elements or advertisements on shopfronts that are above fascia or ground floor level.

- 6.18 Advertisement consent is not sought as part of this application and any relevant consents will be applied for at the relevant time once the tenant is known, if required. However, the proposals do provide indicative locations and details for the anticipated signage zones associated with the new unit as well as presenting an opportunity for wayfinding signage on the eastern elevation. It is proposed that signage associated with the unit is located at fascia level, with high-level projecting flag signage at key locations of approach to ensure visibility. The design language of the wayfinding signage is also anticipated to mirror that of the consented wider wayfinding signage and approach as per the consented placemaking scheme from August 2023 (refs. 2023/2152/P, 2023/2159/A, 2023/2044/L). It is not proposed to install any signage above fascia level, or provide flashing illumination.
- 6.19 The 'in-principle' approach to signage and advertisement is therefore considered to be acceptable in line with this policy. The current proposals do not seek final details of the signage, rather just the key principles of their indicative location and design approach. Should future proposals require advertisement consent, then the relevant application will be made at that time.

Inclusive Design

- 6.20 London Plan **Policy D5 (Inclusive Design)** notes that development proposals should achieve the highest standards of accessible and inclusive design, including providing high quality people focused spaces that are designed to facilitate social interaction and inclusion; be welcoming to all with no disabling barriers and be able to be entered, used, exited and evacuated safely, easily and with dignity for all.
- 6.21 Similarly, **Local Plan Policy C6 (Access for all)** states that the Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.
- 6.22 As set out in the above table, the proposals maintain level access throughout and the building complies with the relevant requirements of Part M of the Building Regulations Approved Document.
- 6.23 The proposals incorporate dwell space with public seating on the eastern elevation, that is considered to foster inclusivity by providing rest points for the elderly, with disabilities or those with pushchairs. The increased width of the route to be created between the Pavilion and the Eastern Coal Drops also is in excess of highways guidance for pavements to allow for wheelchairs and pushchairs to pass each other without the proposed seating and landscaping of the dwell space to restrict movement.

Heritage

- 6.24 **Local Plan Policy D2 (Heritage)** states that the Council will preserve and, where appropriate, enhance Camden's heritage assets and their settings. The policy notes that the Council will not permit the loss of or substantial harm to a designated heritage asset. A detailed Heritage Assessment has been produced and is enclosed within this application which provides a full commentary on the historic context of the site, how

this has informed the proposals and assessment of the impact of the proposals, in line with heritage policy.

6.25 In this case, the proposals are within the setting of a number of statutorily Grade II Listed structures (notably the immediately adjacent Eastern Coal Drops, and more widely the Granary Building, Gasholder triplets, Gasholder 8, Lock Keeper's Cottage and Steam Locomotive Water Point) as well as sitting within the Regents Canal Conservation Area. Whilst the site is located within an Archaeological Priority Area, the proposal is not expected to have any archaeological impacts given the previous development of the yard. The foundations for the building will not encroach within any undisturbed ground beyond the original development of Kings Cross Central and therefore no assessment of archaeological impact is required.

6.26 ***The Regents Canal Conservation Area Appraisal (2008)*** remains the defining strategic guidance document for further development within Coal Drops Yard. This sets out a number of key defining characteristics of the area as well as a summary of the special interest of the site. Specifically, Sub Area 3 addresses the Kings Cross Goods Yard and the key characteristics of the arches as well as the townscape. Notably, it acknowledges that *"The structures and surfaces on site are of interest in themselves but it is the experience of them as a group that is the essence of the character of the conservation area."* It describes key characteristics of the site as comprising industrial hard surfaces and elements of a sculptural quality;

"The surface of the goods yard site is extensively finished in granite sets, which mark the industrial history of the site. [...]. This hard floor treatment is an integral part of the character of this area, which is devoid of planting. The surface treatment is complemented by the utilitarian quality of the goods sheds." and *"The complexity of this space is added to by the ramps which access the lower yard areas below the eastern coal drops and by the elevated sections of railway, which remain on the edge of the space. This adds a sculptural quality to the urban space between the existing buildings on the site and forms a very important part of the character of the Goods Yard."*

6.27 In relation to new development it notes that this should respect the scale of the particular location, and complement the appearance, character and setting of the existing buildings and structures, the canal, and the environment as a whole, respecting the enclosure or openness of particular sections of the canal.

6.28 The enclosed Heritage Statement sets out a detailed overview of the historic context to the site and assesses the proposals in the context of the key elements of the site and the elements that comprise the character and significance of the Conservation Area and the surrounding Listed buildings.

6.29 The Heritage Statement considers the impact of the proposals, considering the following key elements in its assessment:

- Group value
- Scale of proposed development
- Appropriateness of design
- Relationship to the Regents Canal
- Material language and colour

- Landscape Elements
 - Lighting
 - Signage
 - Impact on key views
 - Views from the Regents Canal Towpath
 - Impact on other designated heritage assets
 - Public benefits
- 6.30 In summary, the Heritage Statement concludes that the proposals have addressed the heritage considerations of the immediate site and wider setting and the proposed new Pavilion is considered a highly contextual response which addresses the significance of the designated and non-designated heritage assets through an appropriate but distinctive contemporary language which references the forms and materials of the immediate setting including historic elements. The carefully developed scale and form of the Pavilion has sought to relate sensitively to the surrounding heritage assets whilst reinstating a more intimate sense of scale that reinforces the historically complex interrelationships between the group of buildings at yard and viaduct levels. The material language is also appropriate to create an architecturally distinctive, but visually sensitive, new element which will preserve and enhance the character of the Conservation Area. As demonstrated in the submitted key views, the visual impacts of the proposals are mitigated through high quality design, and a careful consideration of scale, form and materials in relation to the surrounding heritage assets.
- 6.31 In accordance with Camden Local Plan (2017) **Policy D2 (Heritage)**, the proposals preserve and enhance the character and appearance of the Conservation Area and do not cause any harm to the significance of the surrounding heritage assets or their settings. Furthermore, In accordance with the guidance of the Regents Canal Conservation Area Appraisal, the design respects the scale of the location and complements the appearance, character and setting of the existing buildings and structures, the canal, and the environment as a whole, respecting and enhancing the many views from within and outside the conservation area.

Sustainability

Carbon emission reduction

- 6.32 **Local Plan Policy CC1 (Climate change mitigation)** requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. In relation to minor schemes, this involves taking steps to reduce carbon dioxide emissions and promote zero carbon development through the energy hierarchy, encouraging energy efficiency and supporting decentralised energy networks. The energy hierarchy is as set out in the **London Plan Policy SI 2 (Minimising greenhouse gas emissions)** of; be lean, be clean, be green, be seen.
- 6.33 Whilst there are no detailed energy targets required in policy terms for minor developments below 500sqm of new floorspace such as the current proposals, the proposed development will be part of Related Argent's ambitious Net Zero Carbon Strategy that commits the Kings Cross Estate to be net zero carbon by 2035, building on its already carbon neutral status.

- 6.34 In order to achieve this, the energy hierarchy has been followed in the development of the proposals for the Pavilion, to make the fullest possible contribution to carbon emission reduction. The energy efficiency of the building has been maximised to reduce energy demand, through achieving low U-values for the shell and core (exceeding those required by Part L), and introducing natural ventilation as much as possible. Whilst mechanical cooling and air conditioning will be required most of the year, this has been minimised through the design, through external blinds on the southern façade introduced to minimise solar gain and prevent overheating. As such, the building has an ambitious target of achieving EPC minimum B rating.
- 6.35 Whilst not required by policy as a minor development proposal, the proposal also complies with the second stage of the energy hierarchy 'Be Clean' through its proposed connection to the Kings Cross Decentralised Heat Network ('DHN'). This is both encouraged and supported by **Policy CC1** and reduces transmission losses and operational carbon emissions.
- 6.36 The DHN is also currently undergoing an ambitious decarbonisation plan, as part of the wider Net Zero Carbon Strategy for the Kings Cross estate, which will further reduce carbon emissions, through the replacement of the gas-fired CHP. As such, over the next 10 years to 2035, the Pavilion will also be part of the move towards greener energy.
- 6.37 Whilst not required by policy for a minor application, further carbon reductions under the 'Be Green' stage have been considered, to maximise reduction under Part L of the Building Regulations. It is noted that supporting text to **Policy CC1** (paragraph 8.11) sets out that the Council will expect developments of more than 500 sqm of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy), unless it can be demonstrated that such provision is not feasible.
- 6.38 Consideration has also been given to the potential for on-site renewables, including PV panels. However, following careful assessment, these have been deemed to not be feasible. Engagement with manufacturers has been undertaken, however, feedback from manufacturers has been that PV is not feasible for the roof design due to the complexity of the roof shape, finish and construction, which is an important and integral design feature.
- 6.39 In summary, the proposals are considered to comply with policy requirements to reduce carbon emissions as much as possible in line with the energy hierarchy. Indeed, the proposals go further than policy requires for minor development schemes below 500sqm. Further details are provided within the enclosed Sustainability Statement.

Embodied carbon and circular economy

- 6.40 London Plan **Policy SI 7 (Reducing waste and supporting the circular economy)** sets out that development should promote circular economy principles through waste reduction and increases in material re-use and recycling. The supporting text to Local Plan **Policy CC1** also supports such approaches, including consideration of embodied carbon for developments over 500sqm and this is further strengthened through emerging policy in the draft New Local Plan through draft policies CC3 (Circular economy and reduction of waste) and CC4 (Minimising carbon emissions).

- 6.41 Whilst the proposals are not for development of over 500sqm, and so there is no policy basis for detailed assessment, the proposals do seek to reduce embodied carbon and embed circular economy principles into the proposal at the outset, which are detailed further in the Sustainability Statement.
- 6.42 In relation to reducing waste, the proposal is targeting 95% of all construction and excavation waste to be diverted from landfill. The circular economy approach and principles has also underpinned the approach to design and materials, considering durability over the life-cycle of the building. The timber-first approach to the main frame and columns of the proposal seeks to prioritise the use of biobased, renewable materials. Where steel support is required, the first priority will be that this is sourced in the first instance from reused materials and with high recycled content where this is not feasible.
- 6.43 Consideration has also been given to the lifetime of the building and whilst this is designed to be robust for longevity, consideration has also been given to the potential for the materials to be reused in the future. As such, zinc or anodised aluminium tiles are proposed for the roof material, given their durability and ease of recycling, and it is proposed that Material Passporting is implemented wherever feasible to minimise waste during, construction and operation.

Climate Resilience and Overheating

- 6.44 **Local Plan Policy CC2 (Adapting to climate change)** requires development to adopt appropriate climate change adaptation measures, including consideration of green infrastructure, landscaping and surface water run-off, as well as overheating and sustainable design and construction methods. Landscaping and drainage matters are considered in further detail in the sections below, however, the proposals are also considered to successfully incorporate climate resilience through the design and consideration of overheating.
- 6.45 The Pavilion is constructed using durable materials such as metal roofing and aluminium framed windows, and the timber components would be detailed to avoid damage from water. The Pavilion has also been designed to allow for future tenant flexibility, to account for changing needs and demands to further enhance its longevity and adaptability.
- 6.46 The Pavilion has also been assessed in relation to overheating to ensure that this is mitigated in line with the requirements of TM52. As such, measures to promote natural ventilation within the existing structure are provided as a priority, with mechanical cooling only required at certain times of the year. External blinds are also proposed to the southern glazed façade to minimise solar gain.

Summary

- 6.47 As such, the proposals have sustainability objectives embedded within the core of the design and it is considered that the proposals comply with and go further than policy requirements to consider climate change mitigation and resilience. Further details are provided within the enclosed Sustainability Statement and throughout the Design and Access Statement.

Landscaping, Biodiversity and Drainage

- 6.48 In addition to the sustainability measures to mitigate climate change, as set out above, **Local Plan Policy CC2 (Adapting to climate change)** sets out that in addition to reducing carbon emissions, the Council will require development to be resilient to climate change and developments should seek to adopt climate change adaptation measures such as protecting and promoting green infrastructure, not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems, incorporating bio-diverse roofs and green walls where appropriate. Similarly, part K of **Local Plan Policy D1** sets out that development should *“incorporate high quality landscape design [...] and maximises opportunities for greening for example through planting of trees and other soft landscaping”*.
- 6.49 Coal Drops Yard is described in the Regents Canal Conservation Area Appraisal as being ‘devoid of planting’ and it notes that the ‘hard floor treatment is an integral part of the character of this area’. As such, the proposals for landscaping for the Pavilion have been carefully considered to provide an appropriate level that provides additional greening and visual amenity, whilst also preserving the character of the Yard. It is noted that there is significant greening elsewhere within the Kings Cross estate, where this is considered more appropriate and creates a separate distinct character area to the Yard, such as at around Lewis Cubitt Square, along Bagley Walk, at the Gasholder park and, on the opposite side of the Regent’s Canal, the Camley Street Natural Park.
- 6.50 Although the proposals are minor in nature and have a limited footprint, the proposed development seeks to optimise opportunities for greening, planting and soft landscaping as far as possible, with due consideration for its heritage context. The proposals incorporate this through the addition of planters within the dwell space and seating area created on the eastern elevation, and some moveable planters at the southern end, around the covered seating area. In both these spaces, the proposed planting improves the feel of the Yard in the current day context, providing site users visual amenity and encouraging them to dwell whilst not unduly altering the character of the Yard. These proposals are also considered to add the appropriate level of greening within the confines of the site, whilst also allowing sufficient space for movement and servicing vehicles around the yard, as demonstrated through the swept path analysis provided within the Design and Access Statement and enclosed Servicing and Delivery Plan.
- 6.51 Indicative planting schedules for the proposed fixed planters are provided within the Design and Access Statement. These species are considered to provide improved visual amenity whilst also providing increases in biodiversity.
- 6.52 London Plan **Policy G6 (Biodiversity and access to nature)** notes that development proposals should aim to secure biodiversity net gain (‘BNG’). Local Plan **Policy A3 (Biodiversity)** sets out at point D that the Council will *“assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed”*. Given that the site does not meet the de minimis thresholds under national legislation for biodiversity net gain, and there are not considered to be any habitats within the existing red line, no BNG assessment has been carried out. However, the proposals are considered to result in biodiversity

benefits that is proportionate to the scale of the development through the provision of the planters, in line with **Policy A3**.

- 6.53 **Policy CC3 (Water and flooding)** notes that the Council will seek to ensure that development does not increase flood risk and will require development to utilise Sustainable Urban Drainage Systems ('SuDS') where feasible to reduce surface water run-off. The site is in flood zone 1 and therefore has a low risk of flooding. The existing site also comprises existing hard surfacing that is not permeable but benefits from slot drainage to a large attenuation tank below the yard. The proposals seek to improve the current drainage situation by reducing runoff rates through the incorporation of planters around the perimeter and seating area where possible. The proposals also seek to incorporate new slot drainage around the perimeter of the proposals to ensure runoff to the attenuation below. Further details are provided within the enclosed Design and Access Statement.

Transport

Sustainable Transport

- 6.54 **The Mayor's Transport Strategy (2018)** sets the strategic policy direction and oversight for the London Plan and local policies and sets the aim for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041, aiming to reduce car dependency. Similarly, Camden's **Local Plan Policy T1 (Prioritising walking, cycling and public transport)** promotes sustainable transport by ensuring that developments promote walking through supporting high quality public realm improvements and safe routes, promote cycling through provision of cycle parking and links to convenient and safe cycle routes and to promote the provision of public transport.
- 6.55 The site is located in a highly accessible area and is well-connected by a breadth of public transport options including buses, London Underground trains, and national and international rail connections. It is also well connected to a large network of waterways via the Regent's Canal and public footpaths and cycle paths. As such, the King's Cross Central development is already considered to be a hub for promoting sustainable travel and existing residents, visitors and workers overwhelmingly use sustainable transport methods to access and visit Coal Drops Yard. It is not proposed to provide any car parking spaces as part of these proposals, and the development is to remain car-free in line with **Policy T2 (Parking and car-free development)**.
- 6.56 With regard to cycling, the cycle infrastructure in the immediate vicinity (as part of the wider King's Cross estate) is considered to be significant and of a high standard. Section 9 of the Design and Access Statement sets out the existing provision and proposed expansion of cycle parking across the estate in greater detail, however in summary:
- Long-stay cycle parking is provided for workers within Coal Drops Yard in secure stores along Lower Stable Street. These areas not only provide spaces for cycle parking but also showers and changing facilities, and would (as with all other units) be available to workers within the Pavilion.
 - Short-stay cycle parking is provided in significant numbers across the estate in the form of both installed Sheffield stands and TfL cycle hire docking stands (locations shown in DAS). The Estate also supports a number of dockless bike

service providers, and the applicant is committed to the continual review of these and other cycle storage provisions across Kings Cross, in line with s106 requirements.

- 6.57 As such, the existing provision for sustainable transport methods to and from Coal Drops Yard is considered sufficient to accommodate the additional 307sqm of retail space that the proposals will generate, and no new on-site cycle infrastructure is proposed.

Highways Impact, Servicing and Deliveries, and Construction Management

- 6.58 **Local Plan Policy T4 (Sustainable movement of goods and materials)** also notes that Construction Management Plans, Delivery and Servicing Management Plan and Transport Assessments should be provided accordingly on developments over 2,500sqm likely to generate significant movements. **Local Plan Policy A1 (Managing the Impact of Development)** seeks to protect amenity, highways impacts and other impacts from development and notes that factors the Council will consider include (inter alia) transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans and impacts of the construction phase, including the use of Construction Management Plans.

- 6.59 The proposed development provides only 307sqm of additional floorspace and is not expected to generate significant servicing/delivery vehicle movements over and above current servicing and deliveries associated with the wider yard's retail units. However, a Delivery and Servicing and Refuse Strategy has been prepared and is enclosed within this application, which sets out the details the storage of refuse and swept path analysis to demonstrate that all servicing and refuse trucks will be able to access the relocated servicing area in order to serve both the unit, existing units elsewhere in the yard, and the shared refuse store to be re-located just under the western viaduct.

- 6.60 Deliveries and servicing will be carried out in line with the existing arrangements for the rest of the Yard (between 6am-10am) and this is considered to be in accordance with **Policy A4** which seeks to protect the amenity of residents in relation to noise, as the proposals will not significantly alter this baseline level of servicing.

Fire

- 6.61 **London Plan Policy D12 (Fire Safety)** sets out that development proposals must achieve the highest standards of fire safety with a number of points highlighted as requiring compliance under Part A of the Policy. Part B sets out that all major development proposals should be submitted with a Fire Statement produced by a suitably qualified third party assessor, setting out further measures on how the fire strategy will function.

- 6.62 **London Plan Policy D5 (Inclusive Design)** sets out at Part B (5) that in development proposals should be designed to incorporate safe and dignified emergency evacuation for all building users.

- 6.63 The enclosed Fire Strategy Statement has been prepared by a suitably qualified assessor and sets out how the proposals meet the criteria and requirements of **Policies D5 (B5) and D12 (A and B)**, which are in excess of requirements for minor development.

Noise and Amenity Impacts

- 6.64 **Local Plan Policy A4 (Noise and Vibration)** notes that the Council will not grant planning permission for development likely to generate unacceptable noise and vibration impacts, and will only grant permission for noise generating development, including any plant, if it can be operated without causing harm to amenity. The supporting text notes that there is a proliferation of fixed machinery in Camden's centres which cumulatively can have a harmful impact, with the borough home to a large number of food and drink uses, often close to where people live.
- 6.65 **Local Plan Policy TC4 (Town centre uses)** similarly notes that town centre uses must not cause harm to the local area or amenity of neighbours and notes that planning conditions may be sought to control hours of operation, noise/vibration, fumes and the siting of plant and machinery, the storage and disposal of refuse and customer litter, tables and chairs outside of premises, community safety, the expansion of the customer area into ancillary areas such as basements, the ability to change the use of premises from one food and drink use or one entertainment use to another.
- 6.66 The proposals do include for the installation of plant, however this is all internally located (within the Pavilion) with only external ventilation/extraction elements. Furthermore, upon review of the surrounding area of the proposals in terms of both use and general character, it is noted that any sensitive receptors are at a significant distance from the proposals, such that there would be no impact, particularly given that any changes to the baseline noise conditions of the Yard will be negligible as a result of the proposals. As noted by the supporting text, it is the conflict between cumulative impacts of plant and residents in close proximity which this policy is aimed at mitigating, and such conflict or tension between uses does not apply in these circumstances given that the Pavilions' retail function would be located within an established retail area. As such, a Noise Assessment has not been submitted with this application.
- 6.67 It is considered that the other aforementioned potential impacts with regards to amenity through operational noise associated with the use of the Pavilion can be appropriately mitigated through operational management controls, such as opening hours, which would be in accordance with other retailers in the area. It is anticipated that hours of operation can be controlled via condition. Public realm clutter and encroachment are not expected to be elements that will affect neighbouring residents given the distance of properties from the site, provisions of any future leasing of the space, and, importantly, the single management of the Yard as a whole.

7. Conclusion

7.1 Full planning permission is sought for:

“Erection of new single-storey Pavilion building providing flexible retail/commercial unit within Use Classes E(a-b) and associated infrastructure, drainage and landscaping.”

7.2 Overall, the Proposed Development is in accordance with the objectives and policies of the Development Plan, and is considered to deliver high quality sustainable development, meeting economic, social and environmental objectives, as described in Paragraph 8 of the NPPF, as set out below.

7.3 The proposal is considered to result in a number of public benefits, encompassing both social and economic alongside broader placemaking and heritage benefits. The proposals are principally driven by a desire to enhance Coal Drops Yard as a shopping, dining and event location, by increasing the vitality, activity and dwell space within the currently under-utilised southern portion of the Yard through the introduction of a new Pavilion structure providing a flexible retail unit, which would complement other nearby retail and provide an all-day offer, including in the early morning period, from 8am.

7.4 The introduction of the Pavilion within the Yard is considered to significantly improve pedestrian routes and navigability through the Yard, creating an improved public realm and user experience. The design of the unit contains active frontages and, importantly, would create ‘streets’ through the southern portion of the Yard, to enhance user experience and the function of the Yard as a retail area. As such, the proposed Pavilion seeks to reinstate a more human scale to the southern portion of the Yard, reducing its scale slightly to one that is more consistent with its historic scale as well as current use. The increased vitality and re-invigoration of the Yard, as a result, also helps to secure the long-term sustainability of the designated and undesignated heritage assets, a further key public benefit

7.5 The design of the Pavilion has evolved through extensive pre-application discussions and has been carefully considered in terms of massing, form, architectural appearance and materiality to provide high quality design that is contextual and sensitive to the surrounding character of the Conservation Area and other nearby heritage assets. The proposals preserve and enhance the character and appearance of the Conservation Area and do not cause any harm to the significance of the surrounding heritage assets or their settings. In accordance with the guidance of the Regents Canal Conservation Area Appraisal, the design respects the scale of the location and complements the appearance, character and setting of the existing buildings and structures, the canal, and the environment as a whole, respecting and enhancing the many views from within and outside the conservation area.

7.6 In relation to environmental benefits, sustainability has also been embedded within the design at the outset, with the Pavilion designed to reduce carbon emissions through high energy efficiency measures, the reduction of operational energy requirements and overheating and connection into the District Heating Network. Circular economy principles and the reduction of embodied carbon have also underpinned the approach to design and materials, considering durability over the life-cycle of the building,

reducing the use of materials with high embodied carbon and prioritising the use of reclaimed or recycled materials where possible. Furthermore, a deconstruction plan and material passports (where feasible) will be produced to aid end-of-life recovery of materials and components.

- 7.7 The application complies with the policies within the Development Plan and the principles of sustainable development. The NPPF advises that development proposals that accord with the Development Plan should be approved without delay (paragraph 11). From this Statement it is concluded that the proposals accord with all relevant planning policy and should be granted planning permission accordingly.

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