

146-150 Royal College Street, London Borough of Camden

Planning and Heritage Statement

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1.0 INTRODUCTION

1.1 David Lock Associates (DLA) has been instructed by Cumbrae Properties to prepare a Planning and Heritage Statement to support an application for Full Planning Permission in respect of the property known as 145-150 Royal College Street. The site is located in the London Borough of Camden (LB Camden).

1.2 The description of the proposed development is:

'Removal of existing metal walkway and boundary railings. Infill of existing carpark and erection of four storey building (Ground to 3rd floor and green roof) comprising office workspace (Class E), associated landscaping, mews improvements and cycle provision.'

1.3 The Statement provides a description of the proposed development, assesses the proposals against national and local planning policies, and reviews the heritage impact of the proposals. This document is structured as follows;

- **Section 2** – includes a site description, planning history, and details of planning and heritage designations;
- **Section 3** – provides a Statement of Significance for the heritage assets on and near to the site;
- **Section 4** - outlines the proposed development;
- **Section 5** – sets out the planning context;
- **Section 6** - assesses the scheme against relevant policy. This includes an assessment of heritage impacts that is proportionate to the development proposals and consistent with the requirements of NPPF Paragraph 189;
- **Section 7** – provides a conclusion to the Statement.

- 1.4 Gluckman Smith Architects is the agent for the planning application. DLA has had involvement in the development of the proposals and also attended with Gluckman Smith pre-application meetings and a review of the scheme by the Camden Design Review Panel (DRP).

- 1.5 The Design and Access Statement enclosed with the application submission provides a comprehensive outline of design development, and should be referred to for details of the pre-application process, consultation with the Camden DRP, and stakeholder consultation. The Statement of Community Involvement also provides details of the public consultation undertaken.

2.0 THE SITE

Site Location and Context

- 2.1 The application site totals approximately 446 sqm and is situated in the St Pancras and Somers Town ward within the administrative area of the London Borough of Camden (LB Camden).
- 2.2 The site is bound by Royal College Street to the west, Regent's Canal to the north and a two-storey office building (within the applicant's ownership) to the east. To the south, there is a three-storey locally listed terrace, separated from the site by an access road that falls within the site boundary. A Grade II listed terrace at 165-181 (Odd) Royal College Street is located opposite the site on the western side of Royal College Street.
- 2.3 Further north of Royal College Street is a designated neighbourhood centre consisting of a range of local supermarkets and shops and some residential units above. Further south-east of the site, beyond the office buildings, lies Bangor Wharf. This is an industrial site allocated in the Local Plan to provide replacement employment floorspace and residential accommodation.

Site Description

- 2.4 The site is an undeveloped piece of land comprising a vehicular access, car parking area below a footbridge and behind railings, and some greenery adjacent to the Regent's Canal.
- 2.5 Historic maps show that until the 1950's a pair of houses were formerly present facing on to Royal College Street but at present the land forms a gap site within the conservation area. The railings and pedestrian bridge at the boundary of the site detract from the conservation area.
- 2.6 The east of the site (within the same land ownership) comprises two three storey office buildings, connected by a link block and overlooking the canal.
- 2.7 Thames Water has a major water main running across part of the site. The proposals have been designed to take this into account and have been shared with Thames Water, who have confirmed in principle acceptance of

the scheme as it allows them the required level of access to their infrastructure.

Planning History

- 2.8 The site itself has been subject to two applications. The first (TC9906304) was for reduction works to a tree. The second (TP15875/14316) was for 'the erection of a building comprising basement, ground and three floors over, for use for industrial purposes'. The permission was granted in 1960 subject to two conditions – a vehicular entrance with a minimum width of 10ft; and for the building to be used for screen printing, woodwork and metalwork. The permission was not implemented.
- 2.9 There are several applications in relation to the two adjacent office buildings. In 1986, permission was granted for the 'erection of an additional storey on part of the existing building for use as an ancillary typesetting studio with a terrace connection to the existing fire escape' (8601250).
- 2.10 In 1998, two further permissions were granted at the three-storey building for 'alterations to south west and north east elevations through replacement of timber infill screens at ground floor with brick work and casement windows or rear entrance door' (PE9800888) and the 'replacement of the existing open fire escape stair with an enclosed covered link' (PE9800907).
- 2.11 In 2011, an application (2011/4796/P) was submitted for the replacement of the entrance door (on the elevation facing the Canal) to the three-storey building.

Access

- 2.12 The main vehicular access to the site is via Royal College Street, which is a one-way loop that connects with Randolph Street to the north and Georgina Street to the south.
- 2.13 Pedestrian and cycle access are also provided via Royal College Street, which has two dedicated cycle lanes travelling north and south bound.

Accessibility

- 2.14 The site benefits from an excellent PTAL rating (6a). Camden Road Overground Station is less than a 5-minute walk from the site, while Camden Town Underground Station, which provides northern line services, is within a 10 minute walk.
- 2.15 Royal College Street is a designated bus route, served by bus route 46. Bus Stop H is less than 100m north of the site, while Bus Stop Q is approximately 200m to the south.
- 2.16 Royal College Street also has a footway and cycleway in both directions, providing safe and accessible pedestrian and cycle access to the site.

Planning designations

- 2.17 The site is adjacent to the Regent's Canal, which is a Metropolitan Site of Importance Nature Conservation (SINC) and contains a Habitat Corridor. The northern side of the canal is a designated Metropolitan Walk.
- 2.18 As shown in Figure 1, the site falls entirely within Flood Zone 1 – an area of low flood risk and preferable location for development.

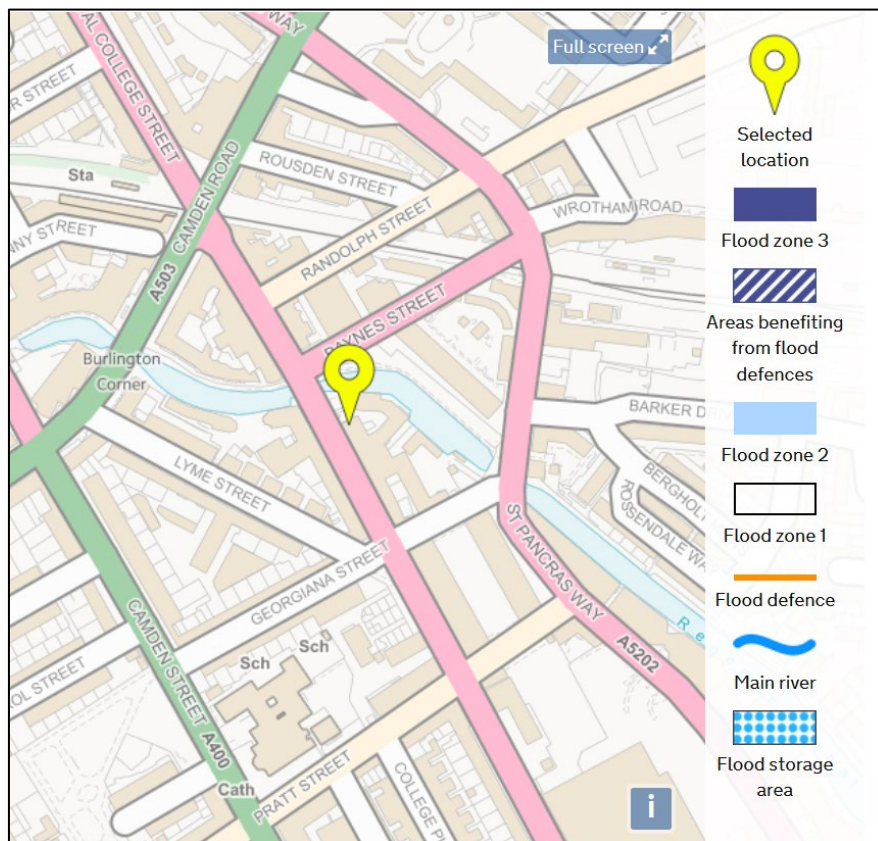


Figure 1 - Flood Zone Map (Source: Gov.uk)

Heritage designations

2.19 The glossary in Annex 2 of the NPPF defines heritage assets as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

2.20 Designated heritage assets are defined in the same glossary as:

A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

2.21 Heritage assets can also be 'non-designated', and the NPPF glossary gives the example of locally listed buildings identified by the local planning authority.

2.22 A summary of heritage assets is provided below. An assessment of their significance and setting is provided in **Section 3.0**.

Conservation Areas

2.23 The site is located within the Regent's Canal Conservation Area, a designated heritage asset. The two existing office buildings adjacent to the site are considered to positively contribute to the Conservation Area, as shown in Figure 2, which is an extract from Camden's Regent's Canal Conservation Area Appraisal, showing the conservation area boundary in purple, listed buildings in red, and 'positive contributors' in green. The approximate location of the site is shown with a yellow star.



Figure 2 - Extract from Conservation Area Map (yellow star shows approximate site location) (Source: LB Camden Regent's Canal Conservation Area Appraisal)

2.24 The Camden Broadway Conservation Area, also a designated heritage asset, is located across the canal to the north of the site. A map of the

Conservation Area showing the boundary, listed buildings, and positive contributors is provided in Figure 3.

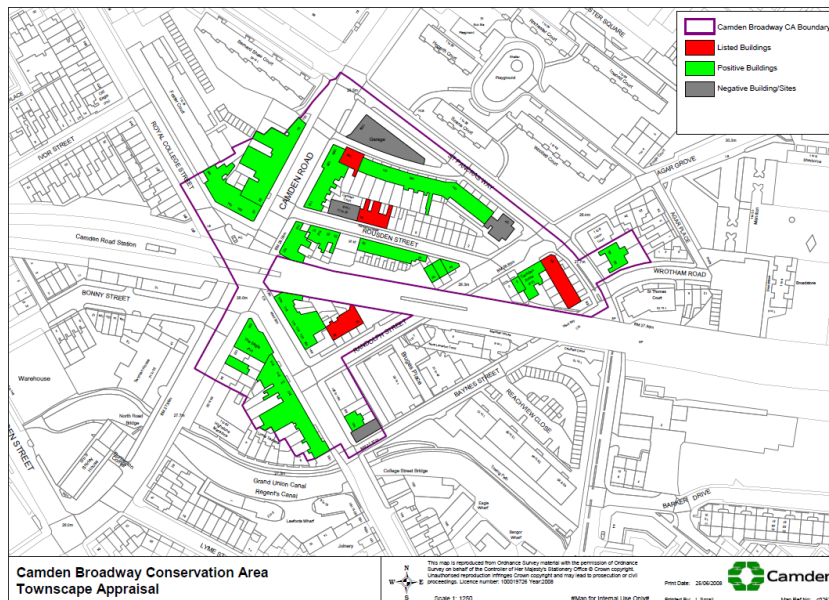


Figure 3 - Camden Broadway Conservation Area Map (Source: LB Camden Camden Broadway Conservation Area Appraisal)

Listed Buildings

2.25 As noted on the maps above, a number of listed building are located within the setting of the site. These are designated heritage assets.

2.26 The following Grade II listed buildings are located near to the proposed development:

- Nos.165-181 (Odd) Royal College Street and attached railings
- Lawford's Wharf Cottage, Grand Union Canal
- Nos.1-10 (Consecutive) Lyme Street
- Nos.24-29 and 31-37 (Consecutive) Lyme Street including Nos.33A and B
- North Road Bridge over the Grand Union Canal
- Nos.25-28 (Consecutive) Randolph Street and attached railings to areas

Locally Listed Buildings

2.27 The following locally listed buildings identified by LB Camden are located near to the proposed development:

- 120-136 & 140 -142 (even) Royal College Street
- Prince Albert PH, 163 Royal College Street

3.0 STATEMENT OF SIGNIFICANCE

3.1 The glossary in Annex 2 of the NPPF defines significance as:

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

3.2 The same glossary defines the setting of a heritage asset as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Historical Development

3.3 LB Camden adopted the Regent's Canal Conservation Area Appraisal and Management Strategy on 11 September 2008. The Appraisal provides information on the historical development of the Regent's Canal and has informed this section of our report.

3.4 The Canal was initiated in 1801 by John Homer, a Paddington barge owner, after the completion of the Paddington Branch of the Grand Junction Canal. The idea was to link Paddington to the London Docks at Wapping on the River Thames. However, the Grand Junction Canal Company refused to supply water, and the landowners on the route opposed.

3.5 In 1810, Homer attempted again to enact the scheme. James Tate, a canal engineer, undertook a survey of a canal linking Paddington Basin to the Limehouse Cut. Homer then convened with John Nash, who was drawing up

- plans for Regent's Park, and subsequently diverted the route through the middle of the new park.
- 3.6 Work began on the Paddington to Camden Town section of canal in October 1812. The canal route was largely determined by landowners refusal for canal passage over their land. Rising costs due to these route changes, tunnelling costs, and embezzlement by Homer (with a subsequent transportation punishment) caused a halt in work until the Government provided loans for the canal to be completed. The final stretch was completed in September 1818.
- 3.7 Trade on the canal increased until it reached its peak from the 1880s until the First World War, when it was carrying around 1m tons of goods per year. The Appraisal includes historic maps of the conservation area, and Figure 4 is an extract from the 1914 OS map showing the application site and the local area around it at the peak of the canal's commercial use.
- 3.8 The 1914 map in Figure 4 shows 3 properties on the application site as part of the wider surviving locally listed terrace at 120-136 & 140 -142 (even) Royal College Street. The southernmost property includes a passageway leading through to Eagle Wharf, shown on the map associated with two wharf buildings that are present today and visible on the southern side of the canal. Bangor Wharf is shown further to the southeast before a road bridge (identified as Gray's Inn Bridge on the map) crosses the canal. A public house is associated with the bridge in the current location of The Constitution.
- 3.9 All of the heritage assets identified in **Section 2.0** above are present on the 1914 map. On the south west side of Lyme Street is a factory and workers houses now listed at Grade II. These date from 1852-1855. Opposite on the north east side of the road are five pairs of semi-detached villas, dating from the mid nineteenth-century and also now listed at Grade II. A public house is present at the junction of Lyme Street, Royal College Street and Georgina Street. This is now the Prince Albert Public House, a locally listed building.

3.10 Nearer to the site on the opposite side of Royal College Street is 165-181 Royal College Street, a terrace of 9 houses dating from c.1845, now listed at Grade II. Two cottages that are now known as Lawford's Wharf Cottage are located to the west of the application site. The building is now listed at Grade II and the 1914 map identifies the associated wharf as 'College Wharf'. Further west is a Grade II listed public road bridge dating from c.1816-20. Finally, to the north of the site are 25-28 Randolph Street, comprising four terraced houses dating from the early nineteenth-century. These are again now listed at Grade II and are located in the Camden Broadway Conservation Area.

3.11 Amongst further residential development the wider 1914 map shows wharfs, stores and depots associated with the canal to the east and west, much of which is associated with significant railway infrastructure.



Figure 4 - 1914 OS map extract (Source: Regents Canal Conservation Area Appraisal and Management Strategy)

Heritage Assets

Regents Canal Conservation Area

- 3.12 The Regents Canal Conservation Area Appraisal sets out that the canal was initially designated a conservation area on 25th April 1974 with subsequent extensions approved on 16th June 1981 (Stable Buildings and Stanley Sidings), 14th June 1983 (King's Cross Goods Yard), 20th March 1984 (part of Bonny Street, Camden Street; the Waterside Centre, Suffolk Wharf Jamestown Road, Wharf Road, Camley Street and Goods Way) and 18th June 1985 (King's Cross Goods Yard). The boundary was adjusted in 2004 following the revised King's Cross Conservation Area Statement.
- 3.13 The Appraisal provides the following summary of the special interest of the Regents Canal Conservation Area:

The Regent's Canal, part of the Grand Union Canal, winds its way through the London Borough of Camden on its way to joining the river Thames, forming a corridor of unique character. The Canal is linked to a 3,000 mile network of waterways. The concentration of industrial archaeology along the Camden section of the canal, with its associated railway features is of exceptional interest and quality, unparalleled in London. It is an important feature of historic and visual interest in the wider townscape and, following the decline of traditional canal-related commercial activities, has been increasingly recognised as a valuable resource for water-based leisure activities, for its tranquil seclusion, for its ecological value and its potential for transportation and informal recreation. It is the Council's intention to conserve and enhance the existing character of the canal and to improve its potential for recreation, transportation and wildlife.

The ever changing views, the variety and contrast of townscape elements and the informal relationship between buildings and canal make significant contributions to the character of the canal. Different sections of the canal vary considerably in terms of aspect, level,

width and orientation and in the nature and function of adjacent buildings and landscape.

- 3.14 Reference is made to the hidden and tranquil character of the canal, and its picturesque quality, compared to the streets around it. The zigzagging nature of the canal is explained as a result of needing to avoid existing land uses and also due to land ownership issues. The Appraisal notes that the route of the canal results in only small stretches being visible at any one time as views are partly curtailed by the bends in the canal and the bridges which cross it and frame distant views. It sets out that the need for roads to pass over the canal with navigational clearance has produced noticeable differences of level and a great variety of bridges with associated vistas.
- 3.15 Many of the industrial buildings and structures are fine examples of industrial brickwork, illustrating styles of engineering construction characteristic of the 19th and early 20th centuries and using various types of brick, some produced in London and others brought in by the railways from their respective regions. Cast iron and wrought iron are also well represented. It is noted that the warehouses and similar buildings on the canal edge provide a sense of enclosure to the canal.
- 3.16 For the purposes of describing the heritage asset, the Appraisal separates the conservation area into three sub areas. The application site is located in Sub Area 2, which stretches from Kentish Town Bridge to Gray's Inn Road Bridge.
- 3.17 The part of the conservation area to the north of the site, between College Street Bridge and Gray's Inn Bridge is described as is one of the largest open planted sections to the canal, with the steep bank on the north side of the canal rising up from the towpath with trees at the top of the bank forming a valuable visual containment. Eagle Wharf, immediately east of the application site, is described as an excellent example of the reinstatement of a historic canalside warehouse building.

- 3.18 Further west beyond College Street Bridge on a raised pedestrian walkway above the towpath is Lyme Terrace. The Appraisal notes Nos. 4-9 Lyme Terrace are a row of five houses dating from the 1840's that form a particularly attractive group fronted by a pavement and railings overlooking the canal. The view from Lyme Terrace south is shown in Figure 6, and includes several of the listed buildings described later below.
- 3.19 To the south east the Appraisal makes reference to the Constitution Public House on top of Gray's Inn Bridge, noting it contributes positively to the conservation area although more could be made of its link to the canal towpath.

Camden Broadway Conservation Area

- 3.20 Camden adopted the Camden Broadway Conservation Area Appraisal and Management Strategy on 12 February 2009. The document sets out that the conservation area was designated by the London Borough of Camden on 20 September 2005. The following summary of the special interest of the conservation area is provided:

The Camden Broadway Conservation Area is a small area comprising a mix of commercial and residential uses. Its character can be divided into two distinct types, and is defined by the busy, main traffic routes through the area (Camden Road, Royal College Street and St Pancras Way) which, on Camden Road and Royal College Street support commercial uses at ground floor level, and by the quieter, residential streets which run between these (Rousden Street and Randolph Street), the height, materials and plot layout broadly respect the C19 development of the area. The railway line runs east-west through the conservation area and its twin supporting bridges are a major presence in the area.

- 3.21 The Appraisal notes that the area's building types are broadly confined to three- or four-storey brick terraces, some stucco-fronted or with stucco detailing at ground floor level. Three busy and noisy major roads are

present, Camden Road, Royal College Street and St Pancras Way, together with two residential streets which are much quieter in character.

- 3.22 The conservation area is bisected by the prominent railway line that runs east-west through the heritage asset. This limits the intervisibility between the proposal site and the parts of the conservation area to the north of the railway line. For this reason only the southern part of the conservation area is considered to be most relevant when considering any setting impact. The Appraisal sets out that a short stretch of Royal College Street from the canal to just north of Camden Road falls within the Camden Broadway Conservation Area. It then describes in detail the buildings in this part of the conservation area, which include a number of positive contributors, as shown in the map in Figure 3.
- 3.23 The application site is located directly south of the Camden Broadway Conservation Area across the Regent's Canal. It forms part of the wider urban setting of the conservation area being located on the southern extent of the busy Royal College Street. As a gap site the application site is not considered to make a positive contribution to the setting or significance of the Camden Broadway Conservation Area, but the redevelopment of the site will be visible from within the conservation area and will impact on its setting.

***Nos.165-181 (Odd) Royal College Street and attached railings
(Grade II listed building)***

- 3.24 This terrace located opposite the application site on the western side of Royal College Street was first listed on 11 January 1999. It is shown in Figure 5. The list description states:

Terrace of 9 houses. c1845. Brick, with rendered ground floors lined with channelled rustication. 3 storeys, each house 2 windows wide with entrance door set at right. All windows with glazing bar sashes under gauged brick heads, but those to Nos 169-181 subsequently set in rendered surrounds. All save Nos 171 and 181 retain doors of an original pattern. INTERIORS: not inspected. SUBSIDIARY

FEATURES: all have cast-iron area railings and first-floor cast-iron balconies. Included as a most complete group.



Figure 5 - Nos.165-181 (Odd) Royal College Street

- 3.25 The significance of this group of listed buildings is derived from its completeness and architectural interest as a mid-nineteenth-century terrace with surviving cast iron railings and balconies. The brick and stucco facing materials are typical of its age and of the wider area.
- 3.26 The application site is located opposite the northern end of the terrace. Here the listed building faces the gap in the townscape created by the site, as well as the high metal railings at its western boundary adjacent to the pavement. Given its unattractive appearance the application site is not considered to be an element of the setting of the listed building that contributes positively to the heritage asset. It does however form part of the wider urban context and setting to the listed building and the redevelopment of the site will impact on the setting of the heritage asset.

Lawford's Wharf Cottage, Grand Union Canal (Grade II listed building)

3.27 This building is shown in Figure 6, which is taken from Lyme Terrace looking south. It is located on the southern side of the canal next to recent residential apartments, and was first listed on 14 May 1974. The list description states:

2 cottages, now a builder's premises, situated on Lawford's Wharf. C19 earlier. Stucco; slated roof with brick gables. 2 storeys. Each cottage double-fronted with 3 windows each. Ground floor with brick verandah at east end; doorways altered. 1st floor with architraved 4-pane sashes having bracketed sills. Western cottage with central 1st floor bow window. INTERIOR: has stair with column newel and square balusters, pointed light on back wall. HISTORICAL NOTE: John Eeles Lawford started in Euston Road, 1840, as a slate merchant and moved to the current wharf a few years later.



Figure 6 - Lawford's Wharf Cottage

- 3.28 The listed building is experienced from the public spaces to the north, such as the raised walkway forming Lyme Terrace. The Regent's Canal Conservation Area Appraisal sets out that the southern side the canal edge in this location opens out on to a former builder's yard site – now redeveloped and occupied by Alpha House, a four storey building of rendered concrete and wood in a nautical style. A similar second building by the same architects flanks the view through from the canal to the retained listed grade II cottages by the wharf.
- 3.29 This cottages are a distinctive feature of the canal framed by the modern development. They are made more prominent by their blue elevations. The historical interest of the buildings is derived from their early nineteenth-century date and their associations with the slate industry. The setting of the heritage asset is dominated by Alpha House and its similarly designed neighbour. The canal forms a positive element of the building's setting, as do the listed buildings on Lyme Street that form the background to Figure 6 and are discussed below.
- 3.30 Interposing development is present between the application site and the listed cottages. The application site is not considered to be an element of setting that makes a positive contribution to the heritage asset. It is possible that the new development and the listed building would be experienced together momentarily by canal users and pedestrians travelling west-east along the canal. Therefore the new development may have a marginal impact on the setting of the listed building.

Nos.1-10 (Consecutive) Lyme Street (Grade II listed building)

- 3.31 These semi-detached villas shown in part in Figure 7 were first listed on 14 May 1974. The list description states:

Street of 10 semi-detached villas. Mid C19. Stucco with rusticated quoins except Nos 5 & 6 with pilasters at the angles. Hipped slated roofs with projecting eaves and central slab chimney-stacks. 2 storeys and semi-basements. 1 window each. Stucco porticoes on returns with flanking pilasters carrying entablature; doorways with

fanlight and panelled doors. Architraved sashes, ground floor with alternating triangular and segmental pediments to each pair; 1st floor with architrave forming pilasters and bracketed sills; some retaining margin lights. Nos 3 & 4 originally with cast-iron balconies to ground floor windows. INTERIOR: not inspected



Figure 7- Nos.1-10 (Consecutive) Lyme Street

- 3.32 The Regent's Canal Conservation Area Appraisal describes the buildings as early Victorian Villas, and notes that each pair has alternating straight and curved pediments above the ground floor windows. The group of paired houses provide a contrast to the terraces of housing that are found nearby. Their use of stucco and slate, front boundary treatments and the green front garden areas all contribute to the aesthetic and architectural value of the heritage assets.
- 3.33 The setting of the listed building comprises the immediate townscape on Lyme Street, and also the canal to the north, and the residential development in the wider area. Due to existing interposing development

there is no intervisibility between the application site and the listed villas. The application site is not considered to be an element of setting that makes a positive contribution to the heritage asset. As shown in Figure 6, the rear elevations of the properties are visible from Lyme Terrace, which also provides views of the application site. The new development and the rear elevations of listed buildings could be experienced briefly together by pedestrians on the canal. Therefore the new development may have a marginal impact on the setting of the listed buildings.

Nos.24-29 AND 31-37 (Consecutive) Lyme Street including Nos.33A and B (Grade II listed building)

- 3.34 This group of buildings shown in Figure 8 was first listed on 14 May 1974. The list description states:

Factory flanked by 12 paired workers' houses. 1852-1855. Grey brick with yellow stock brick dressings. EXTERIOR: No.31 (the factory): Classical style in brick. 4 storeys and semi-basement, 3-window centre flanked by 3 storeys and semi-basement, 2-window slightly recessed wings. Central brick portico with rusticated pilasters carrying entablature; doorway with fanlight and panelled door. Dentil band at 1st floor level, continuing across flanking bays. 4 pilasters, flanking segmental-arched tripartite windows, rise from 1st floor to terminate in dentil cornice capitals above 2nd floor windows, then continuing to simplified dentil entablature with central portion of frieze stuccoed. 3rd floor windows with stuccoed aprons. Brick dentil pediment with small square-headed window in tympanum and bracketed stucco feature on apex. Flanking wings with rusticated quoins to ground floor being slightly wider than upper floors and connected at angle with stucco bracket. Impression of pilasters given by dentil cornice capitals between 2nd floor window arches. Dentil enriched parapets with similarly enriched chimney-stacks on return walls. Nos 24-29 & 32-37 (workers' houses): 3 storeys and semi-basements with 1 window each and 2 storey 1-window entrance bays. Rusticated brick quoins and vertical recessed strips articulating

party walls. Round-arched doorways with stucco keystones and impost bands, fanlights and panelled doors. Single light round-arched sashes with stucco keystones and impost bands at 1st floor level above doors. Ground floor sashes of 3 round-arched lights, each with stucco impost bands and central light with stucco keystone. Similar 2-light sashes to upper floors (both lights with stucco keystones); 2nd floor with narrower lights, breaking through the parapet with Lombard type frieze to terminate in small gables. Nos 28, 29, 33a, 34, 35 & 36 with good cast-iron window guards to ground floor. INTERIORS: not inspected



Figure 8 - Nos.24-29 AND 31-37 (Consecutive) Lyme Street

3.35 The central section of the factory is one of the tallest and most prominent historic buildings in the local area. The historical interest of the buildings includes its original development and use as a factory complete with workers housing. The brick facades contrast with the stucco to the villas opposite, resulting in a varied townscape on Lyme Street and the immediate setting of the listed buildings.

3.36 As for the villas opposite, due to existing interposing development there is no intervisibility between the application site and the listed villas. The application site is not considered to be an element of setting that makes a positive contribution to the heritage asset. Figure 6 shows that the upper storey of the central section of the factory building is visible from Lyme Terrace, which also provides views of the application site. It is possible that the new development and this small part of the listed building would be experienced together from the canalside. Therefore the new development may have a marginal impact on the setting of the listed building.

North Road Bridge over the Grand Union Canal (Grade II listed building)

3.37 This structure was first listed on 11 January 1999. The list description states:

Public road bridge over the Grand Union Canal. c1816-20 with later alterations. Brick and stone. Single elliptical arch. Brick band and solid parapet and piers, with stone coping. Bridge deck strengthened in late C19 by insertion of cast-iron girders. C20 steel staircase interrupting west parapet.

3.38 An image looking west towards the road bridge is provided in Figure 9. Figure 10 shows the view from the bridge looking east towards the application site. The primary setting of the bridge is the canal and the road infrastructure.

3.39 The flank wall of the locally listed building directly adjacent to the application site is a minor element of the view at the centre of the image. It is likely therefore that the proposed development will be visible in the view and will have a minor impact on the setting of the listed bridge.



Figure 9 - looking west towards North Road Bridge over the Grand Union Canal



Figure 10 - view looking east from North Road Bridge over the Grand Union Canal

Nos.25-28 (Consecutive) Randolph Street and attached railings to areas (Grade II listed building)

3.40 This terrace was first listed on 11 January 1999, and is shown in Figure 11. The list description states:

4 terraced houses. Early C19. Yellow stock brick with channelled stucco ground floors. 3 storeys and basements. 2 windows each. Round-arched ground floor openings with keystones. Doorways, approached by steps, with fluted half column jambs, except No.25; panelled doors to Nos 27 & 28, and fanlights, Nos 25 & 26 patterned. Windows, in shallow round-arched recesses, with intersecting glazing and cast-iron guards. 1st floor windows, gauged brick flat arches to recessed sashes set in shallow round-arched recesses with cast-iron balconies, Nos 25 & 26 continuous. 2nd floor, gauged brick flat arches to recessed sashes. Stuccoed cornice and blocking course. INTERIORS: not inspected.



Figure 11 - Nos.25-28 (Consecutive) Randolph Street

- 3.41 The Camden Broadway Conservation Area Appraisal notes that the buildings are set back from the road. Each house has three storeys with basements, the front door approached by three steps. The listed terrace dates from the early nineteenth-century and forms part of a quieter residential street within the Camden Broadway Conservation Area, in contrast to Royal College Street.
- 3.42 The application site is some distance from the listed buildings and is not considered to be an element of setting that makes a positive contribution to the heritage asset. New development on the application site is will not have any impact on its immediate setting.

140 -142 (even) Royal College Street (locally listed building)

- 3.43 This locally listed building is shown in Figure 12. It is a nineteenth-century residential terrace with shopfronts to some properties present at ground floor level. It originally extended into the application site. Unlike the listed terrace opposite is has been altered, particularly at ground floor level, which has a varied treatment both to the elevations and the railings to the front.
- 3.44 Due to its current condition and appearance the application site is not considered to be an element of setting that makes a positive contribution to the locally listed terrace. New development will however affect the setting of the non-designated heritage asset and the relationship between the terrace and the new building is an important planning consideration.



Figure 12 - 140 -142 (even) Royal College Street

Prince Albert PH, 163 Royal College Street (locally listed building)

- 3.45 This Public House, shown in Figure 13, is attached to the terrace immediately north and has elevations facing east and south, where there is a small garden. The building appears to date from the nineteenth-century and its materials and detailing are attractive features within the local townscape. As a Public House, it is likely to have value to the local community.
- 3.46 Due to its current condition and appearance the application site is not considered to be an element of setting that makes a positive contribution to the locally listed building. The new development is likely to have a minor marginal impact on the setting of the non-designated heritage asset due to their shared presence on the same stretch of Royal College Street.



Figure 13 - Prince Albert PH

4.0 PROPOSED DEVELOPMENT

4.1 The proposed development comprises the redevelopment of an under-used temporary car park to provide additional employment floorspace to complement the existing office buildings adjacent to the site to the east. The development seeks to;

- Repair the street where terraced houses previously stood through the introduction of a new sensitively-designed building faced in brick, and reinstate a mews entrance (Eagle Mews) where access was provided historically to the canal side;
- Remove the existing car park and provide modern accommodation complete with 14 new cycle parking spaces to encourage more sustainable commuting patterns by future users of the building;
- Enhance the mews with an independent office in a highly accessible location, providing 781 sqm GIA floorspace, private amenity space, two accessible parking bays, cycle parking and waste storage space;
- Significantly improve the environmental credentials of the site with discreet energy efficient plant and a PV array at roof level, the use of sustainable materials, and a building that targets an Excellent BREEAM rating; and
- As set out in the Design and Access Statement, contribute to urban greening through new planters on Royal College Street, greening within Eagle Mews and the third floor terrace, as well as a new biodiverse green roof.

4.2 For further context, this document should be read in conjunction with the submitted Design and Access Statement and supporting technical assessments.

Use

- 4.3 The proposal is for additional office floorspace. Under the amended Use Class Order (as set out in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), the proposed use falls under Use Class E (Commercial, Business and Service). This new Use Class encompasses the previous Use Class B1 (Business).

Amount

- 4.4 The scheme will provide an additional 781 sqm of office (Use Class E) floorspace (GIA).

Layout

- 4.5 The layout of the scheme responds positively to its context in a conservation area and adjacent to the canal. The building is designed to align with the adjacent terraces to provide continuation on the street. The brickwork at first and second floor reflects with adjacent terraces, while the ground floor façade on the north site is slightly set back to provide Thames Water with access to their assets. The footprint of the building is influenced by a need to retain access to the water main running across part of the site.
- 4.6 To allow for potential future integration, the proposed scheme's floor levels align with the adjacent existing office building. The proposed scheme also allows for a variety of different layouts to ensure the building remain flexible for future-proofing and future occupiers have a choice.

Scale

- 4.7 The proposed building will be four storeys high (G+3), although the top floor is set back and faced in metal cladding to the reduce the building's visual impact on street and canal views. This has created a stepped transition from the top floor down to the adjoining top floor of the adjacent buildings. Although some plant is required at roof level, it will be low (1.5m high) and positioned to minimise its impact on the view.

Appearance

- 4.8 Following a formal DRP presentation and a number of pre-application discussions and design workshops with the officers at LB Camden the building is designed to complement and enhance the local environment, including the conservation area and the adjacent canal. The scheme respects Royal College Street to the west and the canal side to the north.
- 4.9 The brick and metal windows set within deep reveals proposed to the elevations are simple and robust in line with the local context. The metal-clad pavilion at roof level has a lightweight appearance minimising the visual impact of the upper floor of the building.
- 4.10 The ground floor windows facing on to Royal College Street will activate the street for those walking, driving or cycling past, and a lightwell is incorporated along the façade. The entrance to the site is clearly defined with a gate way, door entry system and signage that presents and advertises the Mews to the street. Finally, the canal edge hosts a variety of informal plants, replacement trees, and other greenery to enhance the urban environment.

Open Space and Landscaping

- 4.11 The proposed development will provide active frontages onto Royal College Street and improve the public realm and townscape. The design defines a place where public and private space are clearly distinguished. Streets, footpaths and open spaces are all overlooked by buildings.
- 4.12 The scheme provides quality public and amenity spaces. It is proposed that the length of the building along the canal edge is landscaped with trees and shrubs to enhance the public realm along the canal, and also promote biodiversity and encourage wellbeing for future occupiers. Access to the canal is for maintenance access to the landscaped areas but views can be appreciated from inside the building.

4.13 Private amenity space is provided comprising a grassed area within the canal edge green space, a third floor terrace, and pedestrian shared space formed from Eagle Mews.

Access

4.14 Access to the site remains unchanged, via Royal College Street.

4.15 The entrance is clearly defined with a gate way, door entry system and signage that presents and advertises the Mews to the street. The Mews is organised with clear lighting and signage to ensure safety and security.

4.16 The access will be used by the occasional car that is anticipated to require the use of one of the accessible parking spaces, together with pedestrians, cyclists, service access, and refuse collection.

5.0 DEVELOPMENT PLAN AND OTHER MATERIAL CONSIDERATIONS

Development Plan

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies of the statutory development plan, unless material considerations indicate otherwise.
- 5.2 The Development Plan for the area comprises:
- The Camden Local Plan (adopted July 2017), Camden Policies Map (2020), Site Allocations Plan (2013), Euston Area Plan (2015) and Fitzrovia Area Action Plan (2014). However, the Camden Local Plan (and accompanying Policies Map) is the only plan of direct relevance to the site; and
 - The London Plan (March 2021).
- 5.3 Therefore, these are the relevant documents for Development Control purposes in assessing the planning application. The key policies from the relevant documents are set out below:

Camden Local Plan (2017)	
Policy Number	Policy Name
G1	Delivery and Location of Growth
H1	Maximising Housing Supply
C5	Safety and Security
C6	Access for All
E1	Economic Development
E2	Employment Premises and Sites
A1	Managing the Impact of Development
A2	Open Space
A3	Biodiversity
A4	Noise

D1	Design
D2	Heritage
CC1	Climate Change Mitigation
CC2	Adapting to Climate Change
CC3	Water and Flooding
CC4	Air Quality
CC5	Waste
T1	Prioritising Walking, Cycling and Public Transport
T2	Parking and Car Free Development
London Plan (2021)	
Policy Number	Policy Name
GG2	Making the best use of land
D3	Optimising Site Capacity through the Design-Led Approach
D4	Delivering Good Design
D5	Inclusive Design
D8	Public Realm
D11	Safety, Security and Resilience to Emergency
D12	Fire Safety
D13	Agent of Change
D14	Noise
E1	Offices
E2	Providing Suitable Business Space
E11	Skills and Opportunities for All
HC1	Heritage conservation and growth
HC3	Strategic and Local Views
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodlands
SI 1	Improving Air Quality
SI 2	Minimising Greenhouse Gas Emissions
SI 4	Managing Heat Risk

SI 5	Water Infrastructure
SI 13	Sustainable Drainage
SI 16	Waterways: Use and Enjoyment
SI 17	Protecting and Enhancing London's Waterways
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T7	Deliveries, Services and Construction

Other Material Considerations

Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.4 The Planning (Listed Buildings and Conservation Areas) Act 1990 ("the 1990 Act") provides the legislation that is used to assess the impact of proposals on listed buildings and conservation areas.
- 5.5 Section 66(1) advises that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.6 Under Section 72 (1), in the exercise, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework 2019 (NPPF)

- 5.7 National policy is set out within the NPPF which, at its heart, contains a presumption in favour of sustainable development.
- 5.8 Paragraph 7 of the NPPF establishes the purpose of the planning system, which is to contribute to the achievement of sustainable development performing an economic, social and environmental role. It identifies clearly that local planning authorities should approve development proposals that accord with an up-to-date development plan without delay.

- 5.9 Section 6 of the NPPF identifies the need to build a strong and competitive economy. Paragraph 80 states that 'significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development'. Paragraph 81 states that planning policies should be 'flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances'.
- 5.10 Section 11 seeks to encourage the effective use of land, with Paragraph 118 encouraging local authorities to 'support the development of under-utilised land and buildings'.
- 5.11 The NPPF strongly emphasises the importance of good design and promotes the development of healthy, inclusive and safe communities.
- 5.12 The proposals seek to contribute towards building a strong and competitive economy through the development and enhancement of under-utilised land to create employment uses in a well-designed new building. Therefore, in accordance with the NPPF, it is considered that the proposals should be approved without delay.
- 5.13 Heritage is discussed in Section 16 of the NPPF 'Conserving and Enhancing the historic environment'.
- 5.14 NPPF Paragraph 189 notes that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. **Section 3.0** above provides an outline of the significance of the heritage assets affected by the application proposals.
- 5.15 Paragraph 192 sets out that in determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

5.16 Paragraph 193 explains that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

5.17 Paragraph 197 relates to non-designated heritage assets and states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

5.18 Paragraph 201 acknowledges that not all elements of a Conservation Area will necessarily contribute to its significance. Paragraph 200 encourages redevelopment in these instances, setting out that local planning authorities should look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Regent's Canal Conservation Area Appraisal

5.19 The Appraisal provided the following advice on new development within the conservation area:

The conservation area is varied in scale and new design should respect the scale of the particular location. Appropriate design for the conservation area should complement the appearance, character and setting of the existing buildings and structures, the canal, and the environment as a whole. The enclosure or openness of particular sections of the canal should be respected as this quality contributes significantly to its varying character. Building heights should not interfere with views to local landmarks. Developments should respect and where possible enhance central London panoramas and other views from within and outside the conservation area.

Camden Planning Guidance

5.20 The proposed development has regard to the following CPGs;

Camden Planning Guidance (CPG)	Compliance
Access for All CPG (March 2019)	This document provides further guidance on the accessibility and inclusivity principles set out in the Local Plan.
Air Quality CPG (March 2019)	This document provides further guidance on key air quality issues in the borough and supports Air Quality policies set out in the Local Plan.
Amenity CPG (March 2018)	This document provides further guidance on amenity issues and requirements set out in the Local Plan.
Biodiversity CPG (March 2018)	This document provides further guidance on major and minor developments proposed on sites

	where there is/may be biodiversity value.
Design CPG (March 2019)	This document provides further guidance on detailed design issues and supports the policies set out in the Local Plan.
Energy Efficiency and Adaptation CPG (March 2019)	This document provides further guidance on key energy and resource issues in the borough.
Transport CPG (March 2019)	This document provides further guidance on detailed transport issues.
Trees CPG (March 2019)	This document provides further guidance for development which may affect trees.
Water and Flooding CPG (March 2019)	This document provides further guidance on water efficiency and flooding.

Managing Significance in Decision-Taking in the Historic Environment, Historic England Good Practice Advice in Planning: 2 (2015)

5.21 Historic England in this publication recommends the following structured approach when considering works to heritage assets:

- Understand the significance of the affected assets
- Understand the impact of the proposal on that significance

- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF
- Look for opportunities to better reveal or enhance significance
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected

The Setting of Heritage Assets, Historic England Good Practice Advice in Planning: 3 (Second Edition) (2017)

5.22 This publication suggests the following stage-based approach to the assessment of proposals affecting the setting of heritage assets, and views:

- **Step 1:** Identify which heritage assets and their settings are affected
- **Step 2:** Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
- **Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
- **Step 4:** Explore ways to maximise enhancement and avoid or minimise harm
- **Step 5:** Make and document the decision and monitor outcomes

Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12 (2019)

5.23 This publication also suggests a stage-based approach to analysing significance, as set out below:

1. Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits.
 2. Understand the significance of the asset(s). These two stages fulfil the requirement in paragraph 189 of the NPPF and are undertaken by the applicant.
 3. Understand the impact of the proposal on that significance. This stage fulfils the requirement in paragraph 190 of the NPPF and is undertaken by the LPA. However, the applicant needs to be aware of impacts so that the analysis of significance submitted to the LPA, under paragraph 189, is sufficient in its level of detail.
 4. Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF.
 5. Look for opportunities to better reveal or enhance significance.
- 5.24 The document emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance.

6.0 ASSESSMENT

6.1 The following planning considerations are pertinent to the current application submission:

- Land Use;
- Design (including Open Space);
- Heritage;
- Transport;
- Energy and Sustainability;
- Biodiversity and Trees;
- Flooding and Drainage;
- Waste Management; and
- Amenity.

6.2 These considerations are discussed below with reference to the planning policy and guidance referred to in **Section 5.0** above.

Land Use

6.3 Local Plan Policy G1 sets out the strategy for the delivery of growth in the borough. The policy supports development that makes the best use of its site, considering the quality of design, sustainability, amenity, heritage, transport accessibility and local context. Development that makes inefficient use of land will be resisted, and where possible, mixed-use schemes will be encouraged. The proposed scheme seeks to make more efficient use of the site while responding positively to the local and wider context, including the conservation area within which the site is located. Through pre-application discussions with the Council, the scheme also demonstrates high quality of design and complies with the Camden's policy requirements.

- 6.4 Local Plan Policy H1 states that where sites are underused or vacant, the maximum reasonable provision of housing that is compatible with other uses will be expected. In this case pre-application discussions have concluded that an office use is compatible with the neighbouring offices immediately east, and an appropriate use for the site.
- 6.5 Local Plan Policy E1 supports businesses of all sizes (particularly start-ups and SMEs) and seeks to create the conditions for economic growth in the borough. New office development is directed to Central London and the borough's growth areas and town centres to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. The policy recognises that suitable premises for SMEs are under pressure due to Permitted Development rights and limited land availability, and the Council has introduced Article 4 Directions to address some of these issues. There is clear policy support for the provision of employment space in the borough. The scheme would contribute to Council's provision of this use, which is already under pressure from the effect of Permitted Development rights. In addition, the pre-application advice received supports the proposed increase in office floorspace provided by the proposed development.
- 6.6 Local Plan Policy E2 protects employment premises that are suitable for continued business use. Higher intensity redevelopment proposals of employment premises will be supported provided the employment floorspace is increased (or at least maintained), existing businesses are retained, suitable floorspace for SMEs is included where viable, and the scheme includes employment opportunities for local residents. The provision of inappropriate business space will not be acceptable as this may lead to vacancy. This application proposes an increase in employment floorspace, which is completely in accordance with this policy. The existing floorspace adjacent to the site will be protected for continued business use.
- 6.7 The London Plan strongly supports development that makes the best use of land. London Plan Policy GG2 specifically encourages the development of brownfield land, the prioritisation of sites which are well-connected by

existing or planned public transport, and the intensification of land to support additional homes and workspaces where appropriate.

- 6.8 London Plan Policy E1 supports proposals for new office provision, refurbishment and mixed-use development as they contribute towards the improvement of the quality, flexibility and adaptability of different types of office space. The policy also encourages development proposals related to new or existing offices to consider the need for suitable workspaces, including affordable workspaces.
- 6.9 London Plan Policy E2 encourages local authorities to include policies in local Development Plan Documents that support the provision, and where appropriate, protection of a range of B Use Class [now Class E] business space, in terms of type, use and size.
- 6.10 London Plan Policy E11 also encourages development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.
- 6.11 The proposed development is therefore supported by these policies as it contributes to the office stock in Camden.

Design (including Open Space)

- 6.12 Local Plan Policy D1 seeks to secure high-quality design in development. All development is required to respect the local context and character, preserve the historic environment and heritage assets, respond to natural features and integrate well with the surrounding streets and open space. Development should be sustainable in design and construction, inclusive, accessible, designed to minimise crime and promote health. Outdoor amenity space and high-quality landscape design should be incorporated in development proposals.
- 6.13 Design is a key consideration in the London Plan (Policies D3, D4, D5, D8 and D11) with relevant policies requiring development to be of the highest

architectural quality, integrate a design-led approach that optimises the capacity of the site, and comprise materials that complement the local architectural character. Buildings should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate. They should also include measures to design out crime, as appropriate.

- 6.14 In addition, development should be sympathetic to its local context in terms of form, layout, quality and character. Development should incorporate design measures to create safe and secure places and achieve the highest standards of accessible and inclusive design. The public realm should also be well-designed, safe, accessible, inclusive and attractive, with buildings designed to activate and define the public realm and provide natural surveillance. An Inclusive Design Statement should be included within any supporting Design and Access Statements.
- 6.15 The London Plan also promotes higher design scrutiny. Local authorities and applicants are expected to make use of the design review process to assess and inform design options early in the planning process. As previously outlined, the scheme has already been subject to detailed pre-application discussions, and was considered by Camden’s Design Review Panel (DRP). This has led to various design changes, with the final design reflecting discussions with the Council and DRP. The design evolution is set out in the submitted Design and Access Statement, which details how the proposals positively respond to the local context, character and heritage setting.
- 6.16 Local Plan Policy C6 promotes fair access for all, with buildings expected to meet the highest practicable standards of accessible and inclusive design. The Council will also secure car parking for disabled people where relevant on new developments. The Design and Access Statement enclosed with the application submission includes an access statement, which sets out the standards that are met to ensure appropriate access into and around the proposed building.

- 6.17 Local Plan Policy C5 requires developments to 'demonstrate that they have incorporated design principles which contribute to community safety and scrutiny'. The pre-application advice received from the Council advised that safety measures should be considered in any proposed designs. In addition, the Council welcomes uses which activate the frontage and provide natural surveillance, especially over the canal. To protect the safety of neighbours and future occupiers, London Plan Policy D12 expects all buildings to achieve the highest standards of fire safety.
- 6.18 The scheme has been designed to promote openness and security. It does not include any unused or uncared for spaces which could enable anti-social behaviour. The Design and Access Statement enclosed with the application submission includes a section on safety and security and explains how Secured By Design principles have influenced the proposed design.
- 6.19 Particularly, the site entrance includes sufficient signage and lighting to improve wayfinding, safety and security. The mews itself will also be well-lit and include adequate street furniture.
- 6.20 Local Plan Policy A2 sets out that the Council will ensure developments seek opportunities for providing private amenity space. Part M of the Policy expects the provision of 0.74 sqm open space per commercial occupier. As noted in **Section 4.0**, private amenity space is provided comprising a grassed area within the canal edge green space, a third floor terrace, and pedestrian shared space formed from Eagle Mews.

Heritage

- 6.21 Local Plan Policy D2 states that 'the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets'. Development within conservation areas is required to preserve, or where possible, enhance the character or appearance of the area. Trees which contribute to the character or appearance of a conservation area will be preserved. Development that would cause harm to the significance of a listed building through an effect on its setting will be resisted.

- 6.22 London Plan Policy HC1 requires developments affecting heritage assets and their settings to conserve their significance, by being sympathetic to the assets' significance. London Plan Policy SI16 requires proposals adjacent to waterways to protect and enhance, where possible, existing moorings. London Plan Policy SI17 states that development proposals along London's canal network should respect its local character, environment and biodiversity and contribute to its accessibility and active water-related uses.
- 6.23 London Plan Policy HC3 recognises the importance of local views. CGI images of important views are provided in the Design and Access Statement and have informed the assessment below.
- 6.24 The existing site forms a unattractive gap in the townscape on Royal College Street within the Regent's Canal Conservation Area. It appears as an underused and uninviting hard surfaced space behind modern high metal railings. With the exception of any users of the prominent first floor external footbridge present, no contribution is made to activity on Royal College Street. Whilst it is acknowledged that the greenery facing the Regent's Canal makes a contribution to the character of the waterway, in overall terms it is concluded that the site is an element of the Conservation Area that does not contribute to its significance, under NPPF Paragraph 201. In these circumstances NPPF Paragraph 200 encourages redevelopment within the Conservation Area, to enhance or better reveal its significance.
- 6.25 Equally, the development of the site as proposed in the current planning application would not remove any element of the setting to the other heritage assets identified in this report (the Camden Broadway Conservation Area, and the listed and locally listed buildings near to the site) that makes a positive contribution to those assets.
- 6.26 Historic maps show the previous presence of terraced housing on the site. The flank elevation of the surviving terraced house on the southern edge of the site has structural supports and visible chimney breasts indicating that this elevation was not intended to be seen when built. A new building on

the application site would reinstate built form in this location and remove the unattractive gap site from the local townscape.

- 6.27 The detailed design of the new building has emerged through a number of discussions with planning, urban design and heritage officers at LB Camden, and a consultation with the Camden DRP. The building infills the existing townscape gap provides an active frontage to Royal College Street, improving the vitality of the conservation area.
- 6.28 To the north the footprint of the building at ground floor level is set back from the floors above in order to provide access to the Thames Water infrastructure present on the site. Importantly, this also provides an opportunity to improve the green infrastructure at the canalside on the northern edge of the site. This will conserve the contribution the site makes to the tranquil character and ecological value of the canal, as noted in the Regent's Canal Conservation Area Appraisal.
- 6.29 On the upper floors the building directly fronts the canal providing enclosure to the waterway, a further important characteristic of the conservation area identified in the Appraisal. The occupants of the building will be able to appreciate the canal from within the building, or from the private amenity spaces proposed as part of the development.
- 6.30 The new building is four storeys in height, with the upper floor clad in metal to provide a lightweight above the brick clad storeys below. This use of contrasting materials ensure that the development appears commensurate with the adjacent locally listed terrace, and the positive contributors at Eagle Wharf, and it will not have an overbearing relationship with the listed terrace on the opposite site of Royal College Street. The Appraisal for the Camden Broadway Conservation Area to the north notes that buildings in the area are mainly three or four storey in height.
- 6.31 Brick is the primary facing material, an appropriate material that is characteristic of the local area. Various brick detailing is proposed to the elevations as set out in the Design and Access Statement, and this together

with deep window reveals will add interest to the facades in the context of the conservation area. Reflecting many historic industrial buildings the structural frame of the building is expressed in the bays and fenestration pattern of the elevations. Metal framed windows are proposed which are appropriate to an historically industrial canalside location.

- 6.32 In overall terms it is considered that the removal of the existing harmful townscape gap and its replacement with an appropriately designed new development would at the very least conserve the significance and character and appearance of the Regent's Canal Conservation Area, and the setting of other nearby heritage assets. The proposed canalside green infrastructure respects the character of the Regent's Canal and the role of the site in contributing to this.

Transport

- 6.33 Local Plan Policy T1 prioritises walking, cycling and public transport as the most sustainable means of transport. Developments will be required to improve the pedestrian environment, provide accessible and secure cycle parking facilities (exceeding London Plan minimum standards the Council's design requirements) and high-quality cycling facilities (e.g. changing rooms).
- 6.34 Local Plan Policy T2 This policy requires all new development to be car-free. On-site parking should be limited to disabled parking where necessary, and/or essential operational or servicing needs. Staff parking is not considered essential and will not be permitted. On-street parking permits will not be issued.
- 6.35 The London Plan is clear that development should not adversely impact the transport network (Policies T4, T5, T6 and T7). It also sets out maximum parking standards, with car-free development promoted in locations with high public transport accessibility. Non-residential development should provide at least one on- or off- street disabled bay even if no general parking is provided. Cycling facilities should be provided in line with minimum standards (1 space per 75sqm long-stay; 1 space per 500sqm for

the first 5,000sqm short stay) and be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Finally, provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

- 6.36 The site benefits from an excellent PTAL rating (6a). Through pre-application discussions, the Council confirmed that the scheme was appropriate to be a car-free development with provision only provided for employees and visitors who are disabled. Subsequently, the scheme prioritises more sustainable modes of transport, including walking, cycling and public transport. Two clearly designated, accessible parking spaces are provided within the Mews.
- 6.37 The pedestrian environment will be improved by the scheme, including through the proposed mews improvements such as well-designed lighting and street furniture, and the removal of the existing railings between the site and the pavement. The site is also accessible by public transport, including Camden Road Overground Station (less than a 5-minute walk) and Camden Town Underground Station, which (within a 10minute walk). Furthermore, 12 long stay and 2 short stay cycle spaces are provided. As set out in the Transport Statement enclosed with the application submission, this exceeds the London Plan's minimum requirements.
- 6.38 The application submission also includes a Travel Plan prepared to promote the use of sustainable modes of transport. A Delivery and Servicing Plan is also submitted, which provides a servicing strategy for the whole site and outlines measures that will be required to manage and monitor delivery and servicing activities, having regard to the local highway network, including highway safety.

Energy and Sustainability

- 6.39 Local Plan Policy CC1 promotes zero carbon development and requires all development to reduce carbon dioxide emissions and optimise resource efficiency.

- 6.40 Local Plan Policy CC2 requires development of 500 sqm or more of any additional floorspace to provide a Sustainability Statement, which demonstrates:
- a. the protection of existing green spaces and promoting new appropriate green infrastructure;
 - b. not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;
 - c. incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and
 - d. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.
- 6.41 This information is provided in the Energy and Sustainability Statement enclosed with the application submission. The Policy also requires development schemes to demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation. Non-residential developments of 500sqm or above will be expected to achieve BREEAM 'excellent' rating.
- 6.42 The requirements for developers in London Plan Policy SI 2 apply to major developments. They include net zero carbon development, a minimum on-site reduction of at least 35% beyond Building Regulation, with non-residential development expected to achieve 15% of this through energy efficiency measures, and a requirement to minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations (unregulated emissions). Development proposals referable to the Mayor should calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

- 6.43 Policy SI 4 requires development proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. Major development proposals should demonstrate, through an Energy Strategy, how the potential for internal overheating and reliance on air conditioning systems will be reduced.
- 6.44 Policy SI5 then requires development to achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent, incorporate measures to help to achieve lower water consumption rates and ensure that adequate wastewater infrastructure capacity is provided.
- 6.45 As set out in the Design and Access Statement, sustainability has been considered from an early stage in the project with the aim of using passive design measures to create a building fabric that minimises the need for heating, artificial lighting and cooling. In addition to passive design measures, a number of technologies are to be implemented to help achieve key sustainability targets, such as a target for reduction in CO2 emissions from the site achieved with application of technologies and sources of energy. Further measures like energy efficient light fittings, increased air tightness and water saving appliances will also be incorporated. Materials and recycled materials will be locally sourced where possible. All timber will be from responsible forest sources. The building frame is designed to be as light as possible whilst still providing a robust and flexible structure that has potential for future adaption and flexibility. The use of permeable paving materials and rainwater collection through a Sustainable Urban Drainage System (SUDS) are proposed to most areas of the site to reduce surface water run-off.
- 6.46 As noted above, many of the development plan policy requirements relate to major development. The key requirement relating to the proposed development is the Local Plan requirement for non-residential developments of 500sqm or above will be expected to achieve BREEAM 'excellent' rating. As set out in the Energy and Sustainability Statement, the development is targeting a BREEAM Excellent rating, including for the 'Wat 01' water category. Additionally, a PV solar array is proposed at roof

level to supplement the building's electrical demand and heating and cooling are to be provided by air source heat pumps. The report also sets out that development will achieve a 77.2% carbon dioxide emissions reduction.

- 6.47 The development plan policies that have been referred to above also note the importance of green infrastructure. Urban Greening is also considered in London Policy G5, which requires major development proposals to integrate green infrastructure as a fundamental element of site and building design, incorporating features such as green roofs and walls and high-quality landscaping. Existing green cover retained on site counts towards developments meeting the interim target scores set out in Policy G5 of the new London Plan. As set out in the Design and Access Statement, the proposed development contributes to urban greening through new planters on Royal College Street, greening within Eagle Mews and the third floor terrace, as well as a new biodiverse green roof.

Biodiversity and Trees

- 6.48 Local Plan Policy A3 protects nature conservation sites (including Regent's Canal) and resists development that would result in the loss or harm of a designated nature conservation site. The layout, design, materials and landscaping of proposed developments will be assessed against their ability to realise benefits for biodiversity. Trees of significant amenity, historic, cultural or ecological value should be retained. Replacement or additional trees should be provided where possible.
- 6.49 London Plan Policy G6 protects biodiversity and Sites of Importance for Nature Conservation. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied;
- a. avoid damaging the significant ecological features of the site
 - b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site

c. deliver off-site compensation of better biodiversity value.

6.50 This policy also expects development proposals to manage impacts on biodiversity and aim to secure biodiversity net gain.

6.51 London Plan Policy G7 states that existing trees of value should be retained and any loss replaced. Furthermore, the planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits.

6.52 An Arboricultural Assessment and Method Statement is enclosed with the application submission. This concludes that the proposals will result in the loss of a small number of trees that are largely low category because of their poor condition or small size. There is space for tree planting and a comprehensive new landscape scheme is included as part of the proposal. This scheme, including the planting of a specimen dawn redwood, will significantly enhance the contribution of this site to local character and more than compensate for the loss of existing trees.

6.53 The Design and Access Statement sets out that a core principle of the proposed design is to enhance the current conditions and increase the biodiversity of the site. The report includes a soft landscape strategy, which explains that the tree and plant selections will improve the biodiversity and habitat within the local landscape. A Biodiversity Impact Assessment informed by a Preliminary Ecological Appraisal has been submitted with the application. This explains that the development stands to result in a net gain of 0.05 biodiversity units associated with area-based habitats from pre-development levels.

Flooding and Drainage

6.54 Local Plan Policy CC3 requires development to incorporate water efficiency measures, utilise SuDS where feasible and avoid harm to the water environment.

- 6.55 London Plan Policy SI 13 requires proposals to 'aim to achieve green run-off rates and ensure that surface water run-off is managed as close to its source as possible'. Development proposals for impermeable surfacing will be resisted unless they can be shown to be unavoidable.
- 6.56 The site falls entirely within Flood Zone 1 – an area of low flood risk and preferable location for development. The use of rainwater collection through a Sustainable Urban Drainage System (SUDS) is proposed as set out in the Flood Risk and SUDS Statement enclosed with the application submission.

Waste Management

- 6.57 Local Plan Policy CC5 requires developments to include facilities for the storage and collection of waste and recycling.
- 6.58 Accessible and secure recycling facilities are provided as part of the scheme, located in the mews servicing area. The refuse storage spaces incorporate policy compliant recycling and waste facilities. Recycling and refuse holding areas will be screened with timber screens and planters and are designed to be easily accessible for all tenants.

Amenity

- 6.59 Local Plan Policy A1 protects the amenity of communities, occupiers and neighbours. Development will be assessed for its impact on visual privacy/outlook, sunlight/daylight/overshadowing, artificial lighting levels, transport impacts, noise/vibration and the microclimate. The impact of construction works, contaminated land and water/wastewater infrastructure will also be considered.
- 6.60 Local Plan Policy A4 states that development should have regard to Camden's Noise and Vibration Thresholds. Noise generating development will only be permitted if it can be operated without causing harm to amenity. Sources of noise include fair conditioning units and other fixed machinery. The Council requires an acoustic report to accompany any application where development is likely to generate noise.

- 6.61 London Plan Policy D13 makes it clear that the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses squarely lies on the proposed new noise-sensitive development. Therefore, new development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. London Plan Policy D14 requires development to mitigate and minimise the existing and potential adverse impacts of noise from new development.
- 6.62 The proposals include roof mounted services hidden as much as possible through the lowering of the roof portion below. A Noise Impact Statement is enclosed with the application submission and the results of the assessment indicate that the plant noise is likely to result in low impact and no further mitigation options are deemed to be required.
- 6.63 A Daylight and Sunlight Report is provided with the application. This assesses the effects on the proposed development on the daylight and sunlight amenity of residential properties around the site. It concludes that while there are a handful of reductions in Vertical Sky Component and/or No-Sky Line that exceed default BRE Guidance, these reductions are either to secondary spaces where the change is unavoidable due to the positioning of windows immediately on the Site boundary or notwithstanding the change, the retained daylight levels are very good for the locality. Overall, the daylight and sunlight position can be considered acceptable in planning terms.
- 6.64 Local Plan Policy CC4 states that the Council will take into account the impact of air quality when assessing development proposals. Air Quality Assessments are required where development is likely to expose residents/occupants to high levels of air pollution and mitigation will need to be adopted where relevant.
- 6.65 London Plan Policy SI 1 requires developments to minimise increased exposure to existing poor air quality and be at least 'air quality neutral'. Major development proposals must be submitted with an Air Quality

Assessment. Development proposals must also demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

- 6.66 An Air Quality Construction Impact Assessment is enclosed with the application submission, which assesses the construction phase of the development. The results of the assessment show that the level of dust risk is low for dust soiling and negligible for human health and therefore no further action is required. A number of mitigation options for the construction activities have been provided, to ensure Best Practice is applied at all times during the construction work. Additionally the submitted Energy and Sustainability Statement explains that the proposed building will be heated and cooled via electric air source heat pumps. There will be no use of fossil fuels and in particular, no combustion on site. As a result the operation of the building will not have a detrimental impact on the local air quality and the development can be considered 'air quality neutral'.

7.0 CONCLUSION

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications is made in accordance with the development plan unless material considerations indicate otherwise, and the NPPF (2019) recommends that development proposals that accord with an up-to-date development plan should be approved without delay. As demonstrated through this **Section 6.0**, the proposals are in compliance with the development plan and respond to detailed feedback obtained through pre-application discussions with the Council and the Design Review Panel.
- 7.2 The application site is in a preferred location for development within Flood Zone 1 and benefits from excellent transport accessibility. Its location within a Conservation Area and adjacent to a SINC does not preclude development, and this submission demonstrates how the scheme positively responds to the local and heritage context through well-considered design.
- 7.3 There is strong national, regional and local policy support for utilising land more efficiently, developing underused brownfield sites and providing suitable office space in areas of good transport connectivity. It is recognised that suitable office space in the borough is currently under pressure, particularly due to Permitted Development rights and limited land availability. The proposed development contributes to the Council's office stock and is supported in planning terms.
- 7.4 The impact of development, including on neighbouring amenity and the environment, has been thoroughly considered through a suite of technical assessments submitted with this application.
- 7.5 Through well-considered design, the proposed scheme integrates sustainability to ensure that development responds positively to climate change. The proposal also allows for sufficient infrastructure to meet the needs of the development and improves the pedestrian environment and safety and security of the site.

- 7.6 Therefore, as the scheme complies with the development plan and other material planning considerations, it is considered that the application should be approved without delay.