

Freight Lane, London N1C 4BE

Planning Statement

March 2025

Turley

Contents

1.	Introduction	1
2.	Application Sites and Context	3
3.	Development Proposals	7
4.	Pre-Application Engagement	11
5.	Planning Policy Context	14
6.	Planning Assessment	15
7.	Summary and Conclusions	26

Oliver Jefferson
oliver.jefferson@turley.co.uk

Kinari Tsuchida
Kinari.tsuchida@turley.co.uk

Client
London Borough of Camden Community Investment Programme (CIP)

Our reference
01258

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1. Introduction

- 1.1 This Planning Statement has been prepared on behalf of the London Borough of Camden Community Investment Programme (CIP) in support of two planning applications for full planning permission, which will enable the relocation of Council services from the Cedar Way Industrial Estate to nearby Freight Lane, within associated proposed buildings and structures. These applications are submitted to the London Borough of Camden (LB Camden) in its role as the Local Planning Authority (LPA).
- 1.2 The sites proposed for relocation of these services comprise land on the north side of Freight Lane, which is located to the east of the Camley Street Community Investment Programme (CIP) regeneration sites and to the north of King's Cross, within the boundary of the regeneration area. The sites comprise part of the land parcel occupied by Metroline site (referred to as 'the west site') and part of the Camden Accessible Travel Solutions (CATS) and Fleet Services site (referred to as 'the east site'), both of which are in LB Camden freehold ownership. Please refer to the site location plan prepared by Proun architects.
- 1.3 Vacant possession of the buildings currently housing these services, located within the Cedar Way Industrial Estate, is required by 31st October 2025, to allow for redevelopment of the Cedar Way Industrial Estate, which is subject to separate on-going pre-application engagement with LB Camden.
- 1.4 To note, two separate planning applications have been made – one for the new office/welfare and store buildings within the west site and another for the salt store building and associated installations / structures within the east site. This Planning Statement refers to both applications. The proposed descriptions of development for the applications are as follows:

West site:

Removal of single storey modular building; erection of a single-storey office and welfare building and a single-storey storage building, provision of on-site car parking, and associated works.

- 1.5 Proposals for the west site also comprise the following minor works, which we consider is not necessary to include in the description of development; however, the LPA can take a view on this:

- Provision of 1 wheelchair accessible bay and 2 EV parking bays
- Provision of tactile paving at the existing site accesses along the northern Freight Lane footway

East site:

Erection of a salt store, a salt bin store and modular cabin with WC and staff kitchen and associated works.

1.6 Proposals for the east site also comprise the following minor works, which we consider is not necessary to include in the description of development; however, the LPA can take a view on this:

- Reinstatement of gate providing access to the site via an existing dropped kerb
- Removal and relocation of trading standards container

1.7 This Planning Statement sets out our planning assessment of the proposals against relevant provisions within the Development Plan and material considerations.

Content of the Application

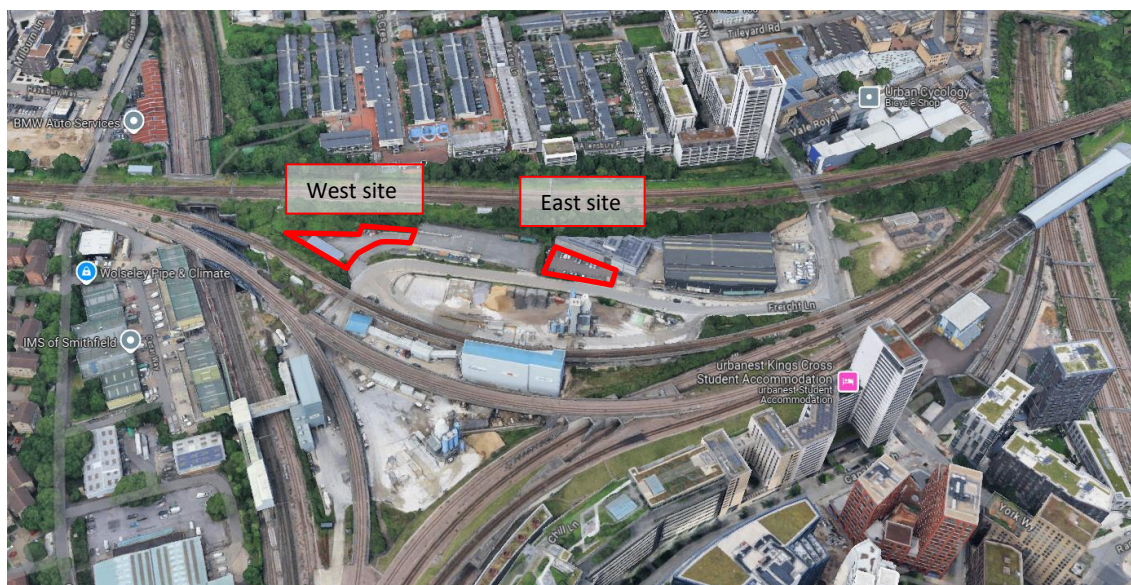
1.8 The planning applications for full planning permission are supported by a suite of technical documents and drawings that are referred to throughout this Planning Statement. The full list of submission material (in addition to this Planning Statement) is as follows:

- Application Form, Ownership Certificates and Notices
- Completed Community Infrastructure Levy (CIL) Form
- Site Location Plan, prepared by Proun
- Existing and Proposed Block Plans, prepared by Proun
- A suite of Existing and Proposed Drawings/ Plans, prepared by Proun
- Design and Access Statement (including sustainability considerations and lighting details), prepared by Proun
- Arboricultural Impact Assessment and Method Statement, prepared by Arboricultural Solutions
- Construction Management Plan Proforma, prepared by LB Camden CIP team
- Desk Study & Ground Investigation Report, prepared by GEA
- Drainage Report, prepared by MWP
- Photovoltaic (PV) Feasibility Technical Note, prepared by ScotchPartners
- Preliminary Tree Inspection, prepared by Arboricultural Solutions
- PUMY-SP R410A Inverter Heat Pump (12.5-15.5kW) Information Sheet, prepared by Mitsubishi
- Transport Statement (including vehicle Tracking Drawings), prepared by Markides Associates

2. Application Sites and Context

- 2.1 As noted above, the applications relate to two Council-owned sites located on the northern side of Freight Lane – West site and East site.

Figure 2.1: Location of West and East sites (Source: Google Map, approx. site boundary added in red by Turley)



Site Description and Existing Use

West site

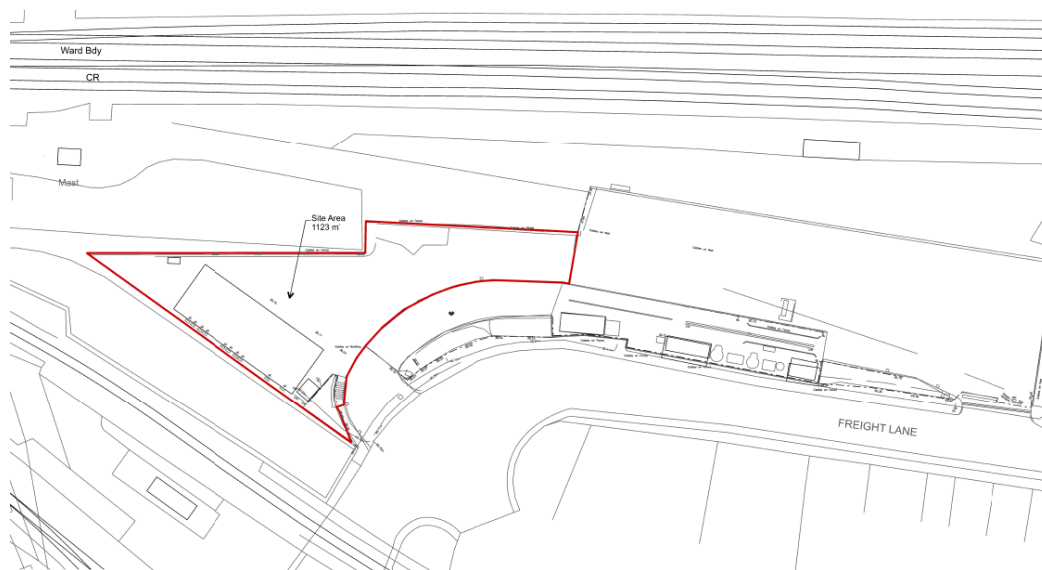
- 2.2 The west site is a roughly triangle plot, covering an area of 1,123sqm, and is located on the western corner of the wider Freight Lane depot site.
- 2.3 The site is located to the north side of Freight Lane, accessed from Freight Lane. It comprises largely open hardstanding, plus features ancillary to its current usage by Metroline, including a single storey modular building. The Metroline site is used by Metroline for its London bus service routes, operated under license from Transport for London (TfL). Metroline uses the site for bus parking, staff parking, bus washing and re-fueling. The location of the proposed Greenspaces facilities is currently occupied by Metroline temporary accommodation cabins, which will be removed. Agreement has been obtained from Metroline with regards to the proposed use of part of the site
- 2.4 There are trees and a green verge adjacent to the site (immediately to the south-east of the existing cabins) and a hedgerow to the north-west, beyond which are railway lines to the north and west. To the south of the site across Freight Lane is railway land and the Tarmac concrete plant site. The land to the east of the site and wider Metroline-occupied land parcel is used by CATS and Fleet Services by the Council (the east site is sited within this adjacent land).
- 2.5 Access to the site is from Freight Lane, via a vehicle ramp which rises approximately 2m to the site level. Currently vehicles enter the site this ramp at a lower level and exit via

another access point towards the centre of Freight Lane, at the same level. These access routes will not be altered by the application.

2.6 The existing use of the site is as follows:

- Currently occupied by Metroline bus parking with associated staff accommodation and facilities, operated under license from Transport for London (TfL).
- The location of the proposed development currently houses a modular building (with existing GIA floorspace of 223sqm) previously used as a Metroline staff facility/accommodation cabin, which will be removed by Metroline.
- There are also refuelling stations and vehicle wash facilities in the parking area, outside of the redline for this application, which will remain unaltered. Agreement has been obtained from Metroline with regards to the proposed use of part of the site, which will still enable Metroline operations to be carried out.

Figure 2.2: Existing Block Plan of the West site, prepared by Proun



East site

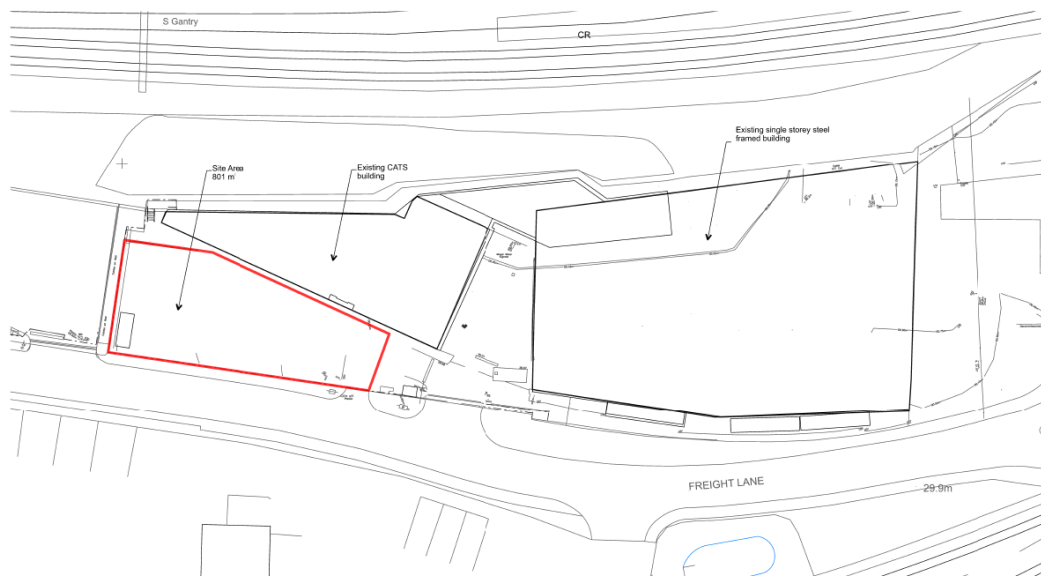
- 2.7 The east site is a roughly triangle plot, covering an area of 1,123sqm, and located in a corner of the Council's CATs and Fleet Services Depot, adjacent to the aforementioned west site; it covers an area of 801sqm.
- 2.8 The site is located in the central part of the wider Freight Lane depot site, on the northern side of Freight Lane.
- 2.9 The application site is bounded by single-storey depot and canopy buildings (used by CATS) to the east. To the north, the site is adjacent to trees and hedgerows and railway lines beyond. To the south of the site, across Freight Lane, is the Tarmac concrete plant site, followed by further railway lines, whilst the west of the site is a car parking space used by Metroline.

2.10 Access to the site is directly from Freight Lane.

2.11 The existing use of the wider site is as follows:

- Currently occupied by Camden Accessible Travel Solutions (CATS) with associated MOT Centre and vehicle wash facilities for Council vehicles and public customers.
- The CATS Depot and Fleet Services site currently accommodates:
 - an MOT test centre (for Council vehicles and public customers);
 - management of the council vehicle fleet, including maintenance and washing;
 - fuelling and electrical charging of vehicles, and
 - 30 car parking spaces for staff (this will be redeveloped to provide the proposed salt store, a salt bin store and staff accommodation for Environmental Services).
- CATS administers various accessible transport services such as the Freedom Pass, Disabled Drivers Assessment scheme and Blue Badges.
- The development proposals use a part of the CATS site, but the above facilities and services will continue to be carried out within the wider site.

Figure 2.3: Existing Block Plan of the East site, prepared by Proun



Site Designations and Allocations

2.12 The sites are within the Central London Area / Central Activities Zone (CAZ) and the King's Cross Growth Area, as per the Local Plan.

- 2.13 As noted above, beyond the northern boundary of the sites is an area of vegetation, which forms part of the 'North London Line at York Way' Site of Importance for Nature Conservation (SINC) (Borough Importance Grade II).
- 2.14 The London View Management Framework (LVMF) Viewing Corridor 3A.1 (Kenwood viewing gazebo to St Paul's Cathedral) runs over the west site, and the wider setting consultation area is in proximity to the east site.
- 2.15 Neither sites are within a Conservation Area and the sites do not contain nor are in proximity to listed or locally listed buildings.
- 2.16 In terms of transport accessibility, the sites have a PTAL Rating of 1b-2 with 0 representing the least accessible locations and 6b the highest, therefore are subject to relatively poor accessibility. According to the TfL's online WEBCAT Tool this is expected to remain at this level based on a forecast for 2031. However, the sites are within a short walking distance from highly accessible areas, including Kings Cross.
- 2.17 The sites are in Flood Zone 1, indicating a low probability of flooding.

Existing and Emerging Surrounding Context

- 2.18 The local area has a utilitarian character embodied by its use for maintenance depots and vehicle/materials storage facilities. There are residential areas somewhat distant e.g. the Maiden Lane Estate, to the north, beyond the railway lines sited in that direction. To the west of the various railway tracks is the Cedar Way Industrial Estate which is expected to be redeveloped into a mixed-use neighbourhood, forming parts of the draft Local Plan Site Allocations – S4 (CSP2) 120-136 Camley Street and S5 (CSP3) 104-114 Camley Street and Cedar Way Industrial Estate.
- 2.19 It is noted that the Camden High Line route will run along the opposite side of the mainline railway, to the north beyond the SINC – though this will not be affected by the proposals.

3. Development Proposals

- 3.1 As noted above, the proposals will enable relocation of Council services from the Cedar Way industrial estate to two council-owned sites on Freight Lane.
- 3.2 The facilities for relocation comprise those for Greenspaces and Environmental Services.
- 3.3 Greenspaces facilities (managed by contractor IdVerde – currently in Unit 26), are required to provide:
- office space;
 - welfare space, and
 - an equipment and machinery store.
- 3.4 Environmental Services (managed by contractor Veolia – currently in units 20 and 23 Cedar Way) has a requirement for:
- a salt store and grit bin store;
 - a street cleansing vehicle wash unit (making use of existing CATS facilities), and
 - limited staff parking.
- 3.5 The proposed descriptions of development of the two full planning applications are as follows:

West site:

Removal of single storey modular building; erection of a single-storey office and welfare building and a single-storey storage building, provision of on-site car parking, and associated works.

East site:

Erection of a salt store, a salt bin store and modular cabin with WC and staff kitchen and associated works.

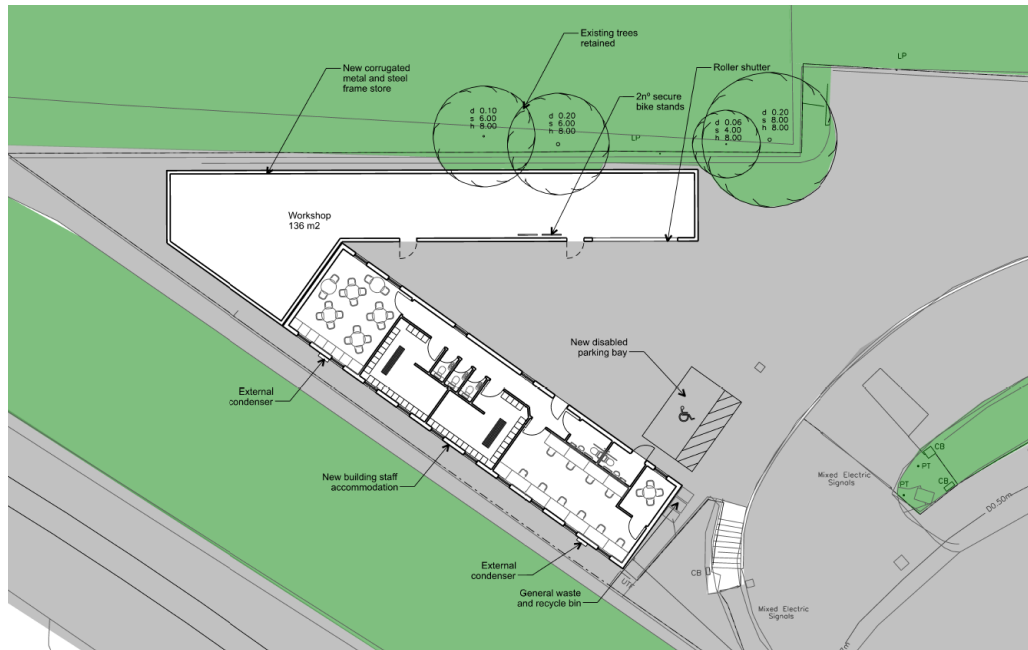
- 3.6 It is anticipated that, for both sites, the uses and facilities will be in situ in their proposed form for circa 5 -10 years.

West site: Office and storage buildings

- 3.7 The proposals comprise erection of a new single storey modular building for Greenspaces within the western corner of the Freight Lane depot site. The proposed building will comprise office and staff welfare facilities, including a meeting room, canteen, flexible changing rooms with lockers for male and female staff, and toilets including 1 fully accessible for any wheelchair users (covering 132sqm of GIA floorspace).

- 3.8 A single storey storage is also proposed on the site and this will be provided to the north in the form of a long narrow workshop building (covering 136sqm of GIA floorspace). The storage will store machinery used by the contractors, such as sit on mowers and other ancillary items essential in undertaking the works.
- 3.9 The new store will be internally 4m clear. Externally at its lowest height, it will approximately be 4.4m and at its highest 6m. The height is governed by the recommendations for a clear internal height of 4m and to develop the building as all corrugated metal which creates a minimum roof fall of 10° to allow a maintenance vehicle to reverse into the space for loading and off-loading of materials.
- 3.10 The facilities will be open weekdays (Monday to Friday) between 6.30 am to 11.00 pm. The employees will report to the site daily between 6.30 am and 7.00 am to pick up the operational vehicles (Transit Vans/Caged Vehicles) and leave between 7.00 am and 8.00 am to work around the borough. These operational vehicles will then return to the site between 3.00 pm and 4.00 pm.
- 3.11 The existing pedestrian access to the site will be retained from the western Freight Lane junction roundabout by the existing steps up into the site.
- 3.12 It is proposed to provide dropped kerb and tactile paving at both of the existing Metroline Site accesses to aid pedestrian movements along the northern Freight Lane footway.
- 3.13 Vehicular access/egress will be via the existing ramp, located at the western end of the site's frontage along Feight Lane. All vehicles sized up to Light Goods Vehicles (LGVs) will perform a three-point turn within the site to exit the site in forward gear via the existing ramp. Any infrequent large vehicle will need to access the site using the existing ramp and egress using the existing eastern site access along Freight Lane.
- 3.14 The proposed development is to be car-free, except for operational LGVs parking associated with the Greenspace operation. It is also proposed to provide 1 new designated disabled parking bay and 2 EV passive parking bays.
- 3.15 For cycle parking, 2 long-stay and 2 short-stay cycle parking spaces within the proposed storage unit via Sheffield stands. Shower and changing facilities will be incorporated within the proposed building.

Figure 3.1: Proposed Site Plan of the west site, prepared by Proun

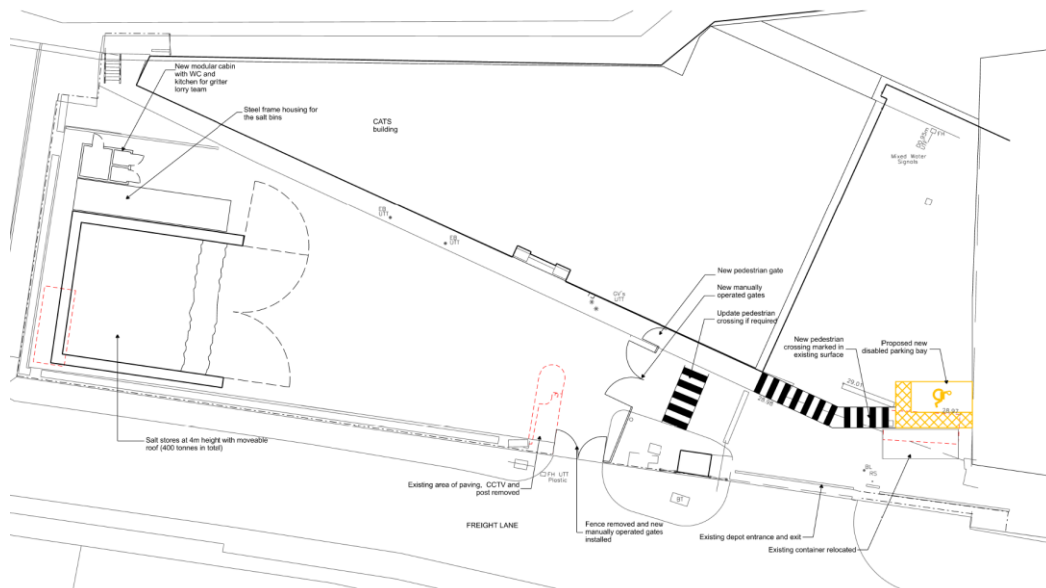


East site: Salt store

- 3.16 The proposals comprise a single storey salt store (circa 4m in height with a capacity of up to 400 tonnes) and a container to be used as a salt bin store (covering 28sqm of GIA floorspace), together with a new modular cabin for toilets and staff kitchen for the gritter lorry team (covering 9.5sqm of GIA floorspace) for Environmental Services.
- 3.17 The salt store is to be constructed from concrete, with two bays, covered by two parallel pitched roofs, which are retractable canvas roofs made in three sections. The store is to be secured with two sets of galvanised steel gates to the front.
- 3.18 The proposals will result in a loss of 30 existing car parking spaces. The existing disabled car park bay located at the crossover within the CATS site will be relocated to another part of the existing CATS site, outside the red line boundary of the east site.
- 3.19 In terms of vehicle movements, it is anticipated that the salt store will be filled by a 16.5m Articulated Vehicle during the gritting season. There is a dedicated area to allow the on site grit loader to transfer grit to the gritter vehicles.
- 3.20 The site will also house the relocated wash facilities to clean LBC road sweeper vehicles. The existing wash facilities within the CATS site will be upgraded to meet the road sweeper vehicle cleaning requirements. The timing and number of vehicles using the relocated wash facilities and the salt store will remain the same as the existing operation at Cedar Way Industrial Estate.
- 3.21 It is anticipated that the salt delivery vehicle (16.5m Articulated Vehicle) and all trips associated with the vehicle wash facilities will be made via the existing CATS access off Freight Lane.

- 3.22 Due to the out of office hours operation associated with the gritter vehicles, it is proposed to remove the fencing across the existing crossover to the west of the existing CATS site access. A new manually operated gate will be provided to allow for out of hours gritter vehicles' access to the salt store as well as new internal pedestrian gate, allowing the salt store site to be closed off from the remainder of the CATS site.
- 3.23 It is also proposed to remove and relocate an existing trading standards container from southwest corner of the site to the eastern part of the wider CATS site (not addressed within this planning application).
- 3.24 The existing peninsular pavement section and CCTV post, adjacent to the new gate will be removed and surfaces to be made good.

Figure 3.2: Proposed Site Layout, prepared by Proun



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 (2024) at paragraphs 40, 127 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 engaged in pre-application discussion with LB Camden Planning Officers in November 2024 (with a follow-up response received in February 2025). A brief summary of the key feedback provided by Officers is provided below:

Use of the site for employment purposes

- 4.3 The principle of the relocation of Council services is accepted. The development should retain existing businesses (i.e. Metroline buses) on site where possible particularly as such service premises help to support the local economy.

Safeguarding of transport infrastructure

- 4.4 No objection in terms of safeguarding of transport infrastructure, as long as there is no excess reduction in bus parking capacity or restrictions on movement as the result of the proposed development. Tracking plans should be provided to ensure bus movements within and in/out of the site are not detrimentally affected. TfL will be consulted on any full planning application.

Design

West site: Office and storage buildings

- 4.5 No objection to the scale of the development and welcome the proposed replacement building which would be a better-quality facility.
- 4.6 Planting should be considered for the site surroundings wherever possible in order to improve the visual quality of the site, and to maximise local biodiversity and ecology.
- 4.7 Further to design development during the pre-application process, the design and appearance of the proposed modular office building and storage building was accepted.
- 4.8 Following feedback with regards to the accessibility of an early version of the pre-application proposals, which features a two-storey building, the revised approach of a single storey building and single storey store is acceptable.

East site: Salt store

- 4.9 The salt store would have a utilitarian appearance that would be suitable for its location, which is already predominantly covered by storage buildings, and given its use for storage only.

Neighbouring amenity

- 4.10 Given the height and limited floorplates of the proposed buildings relative to the host sites, allied to the substantial separation distance from existing and emerging residential developments, there would not be any impact on residential amenity in terms of a loss of day/sunlight, outlook or privacy.
- 4.11 The proposal would include new plant and other equipment, though these installations are not expected to be substantial in scale. As such, noise from these could be controlled by the usual standard conditions.
- 4.12 If new lighting is proposed it should be demonstrated that this will not adversely affect residents or future residents in the local area.

Sustainability

- 4.13 Any submission should identify how the buildings can be easily re-used in the future and should also confirm that they will not head to landfill once their use on site has ended.
- 4.14 The development should do all it can to minimise carbon emissions through reducing demand for energy through actions such as using materiality, building orientation and siting of windows to minimise overheating and demand for active cooling (air conditioning).
- 4.15 Use of sustainable materials where possible is also strongly supported.
- 4.16 The installation of PVs on site should be explored by way of maximising the carbon benefits from the site.
- 4.17 SUDS should be utilised to achieve greenfield run-off rates where possible and measures (such as oil interceptors) should be installed to ensure that there is no harm to the local water environment.

Biodiversity and Ecology

- 4.18 Confirm that the construction methodology and activities within the building adjacent to the SINC will not affect its ecological quality.

Transport

Site access

- 4.19 Further details of access arrangements, including measures to minimise conflict between pedestrians, cyclists and vehicles, should be provided in the Transport Statement.
- 4.20 Requested to enhance the pedestrian environment to improve safety and access.

Operational parking

- 4.21 Loss of car parking spaces at the CATS/ Fleet Services site for operational needs and for some of the spaces to be used for disabled parking is supported.

- 4.22 For the west site, the provision of operational parking is supported.
- 4.23 Requested to consider any impact from the removal of car parking on site with regards to potential for overspill parking on local streets and to confirm that there would not be a detrimental impact on bus operations on site.
- 4.24 A detailed statement on traffic activity on the site is required to make clear that the site can be effectively managed over the long-term with the development proposals in place.

Disabled parking

- 4.25 Requested for each site to provide 1 accessible parking space.

Construction

- 4.26 Requested to submit a Construction Management Plan (CMP) using the Council's CMP pro-forma.
- 4.27 Requested a financial contribution towards highways works, which is applicable to all developments where construction works might result in damage to public highway. The level of contribution will be determined at the planning stage, and will also be directed towards the upgrade of the pedestrian footway on Freight Lane.

Servicing

- 4.28 Requested for vehicle tracking plans as part of the submission.
- 4.29 Acknowledged that there is a limited opportunity to reduce the vehicle movements for gritters and Greenspace maintenance vehicles which currently operate essential council services from Camley Street, and no impacts will be given rise to/ from those units once these services are relocated to Freight Lane.
- 4.30 Financial contribution may be requested towards a delivery plan and public realm improvements in the local area, depending on the final transport impacts of the development.

Contamination

- 4.31 Requested for an appropriate contamination study.

5. Planning Policy Context

- 5.1 Section 38(6) of The Planning and Compulsory Purchase Act 2004 requires that, where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Development Plan

- 5.2 Relevant Development Plan documents for the application sites comprise the following documents:

- London Plan (2021)
- Camden Local Plan (2017)

Other Material Considerations

- National Planning Policy Framework (2024)
- National Planning Practice Guidance (PPG) (2024)
- Supplementary Planning Guidance (SPG), including (not an exhaustive list):
 - Amenity CPG (2021)
 - Design CPG (2021)
 - Employment Sites and Business Premises CPG (2021)

Camden Draft Local Plan

- 5.3 LB Camden is in the process of preparing a new Local Plan to replace the adopted Local Plan. The draft new Camden Local Plan sets out our vision for future development in Camden for the next 15 years. It is currently at Regulation 18 stage.
- 5.4 The Council consulted on the draft new Local Plan from 17 January to 13 March 2024 (Regulation 18). The Council is currently considering all the responses received and will publish an updated version of the Local Plan for further consultation in 2025. It is anticipated to submit to the Secretary of State for examination in Spring/Summer 2025, with an anticipated adoption in Spring 2026.
- 5.5 Given the draft Local Plan is at very initial stage, it is considered that the emerging plan has limited weight in decision making at present. This is reflected in the planning assessment below; however, this represents the most up-to-date reflection of the LPA's priorities and therefore draft Local Plan policies have been considered (where relevant) in this assessment.

6. Planning Assessment

Safeguarding of Transport Infrastructure (West site)

- 6.1 By virtue of the bus facilities operated by Metroline, the site is considered to be part of London's public transport infrastructure. London Plan policy T3 sets out the key policy tests:

B. Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:

(1) safeguarding existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)

- 6.2 There is also accompanying guidance (Sustainable Transport, Walking and Cycling London Planning Guidance, 2022), which states:

4.2.1 Development proposals should not harm, or make unviable, the current operation or future enhancement of the bus network. Development proposals should not result in the loss of the following (unless suitable alternative provision is formally agreed with TfL and provided before the existing facility is lost):

- any bus garage or bus garage capacity (including for depot storage and maintenance)*
- any bus station or passenger interchange, or access thereto and therefrom*
- bus stops, standing or driver facilities, or access thereto and therefrom....*

- 6.3 We consider that the provisions in the above guidance, which refer to protection of "any bus garage.. etc" may be somewhat onerous and could be argued as going beyond what the policy requires, which is to ensure there is "sufficient and suitably-located land". In this respect, we note that guidance can only supplement policy but cannot request for additional requirements than is set out in policy. Notwithstanding the above, there will be a reduction in the overall site area; however, the proposals will not result in the loss of the bus facility.

- 6.4 Local Plan Policy T3 states that the Council will seek improvements to transport infrastructure in the borough and protect existing and proposed transport infrastructure.

- 6.5 To the extent that it may be considered necessary to lift the safeguarded status of the land, as public transport infrastructure, in relation to the site extent of the western application site, we note that this land is effectively surplus to requirements, given that Metroline facilities can continue to operate, even accounting for the potential impact of

fleet electrification (anticipated by 2034), which is considered to increase bus stabling space requirements by c. 20%.

- 6.6 Metroline has reviewed its current and future operational needs, in relation to the bus services that it runs / serves from the site. Metroline is not currently using the site operationally but plans to utilise the site again in the near future and also has considered requirements for future electric vehicle infrastructure on the site. Metroline has confirmed that the remaining area of the site is sufficient for its purposes now and in the future.
- 6.7 Accordingly, the proposals do not create a conflict with London Plan Policy T3, Sustainable Transport, Walking and Cycling and Local Plan Policy T3 as the proposals will not impact materially on current transport infrastructure requirements and anticipated future needs (including electrification). The proposals will both provide essential Council services, as well as enable the relocation of these services being required to enable the redevelopment of the Camley Street CIP sites, with significant associated benefits.

Loss of Car Parking (East site)

- 6.8 London Plan Policy T6 (part B) states car-free development should be the starting point for all development proposals in places that are well-connected by public transport.
- 6.9 Local Plan Policy T2 requires that all development is required to be car free, other than spaces required for disabled people and for essential operational needs.
- 6.10 Draft Local Plan Policy T5 notes that the Council will limit the availability of parking and require all new developments in the borough to be car-free.
- 6.11 The proposals on the east site include a loss of circa 30 spaces. The loss of staff parking on the CATS depot has been agreed in relation to LBC's Corporate Policy regarding the reduction in car use. A communications strategy is being developed in parallel to this with the Camley Street Community Engagement Officer, to ensure this process is managed effectively and sensitively.
- 6.12 Based on the trip generation assessment as set out in the Transport Statement, it is estimated that only 1 out of 10 existing Environmental Services employees is using a private vehicle to work. As such, it is considered that the removal of car parking on site will not result in overspill parking on local streets. In addition, Freight Lane is a double yellow lines and therefore parking is prohibited at all times.
- 6.13 The site is reasonably located to a variety of active, public and car alternative transport options. It is within a 15-minute walk of the Council's main offices at 5 Pancras Square and there are regular bus services running along York Way, which connect with King's Cross. As such, staff and visitors will be able to use the public transport network to access the site.
- 6.14 Accordingly, the proposals are considered to be in accordance with London Plan Policy T6 (part B), Local Plan Policy T2 and Draft Local Plan Policy T5.

Transport and Highways Impacts

- 6.15 London Plan Policies T1 and T2 state development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 6.16 London Plan Policy T4 states that the impacts of development on public transport and the road network capacity should be taken into account and mitigated where necessary.
- 6.17 Local Plan Policy T1 states the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 6.18 The proposals are supported by a Transport Statement, prepared by Markides Associates. It is concluded that all facilities are currently operating out from the Cedar Way Industrial Estate and the relocation will be undertaken on a like-for-like basis. Therefore, all the associated employee trips and operational/servicing trips relating to the sites are existing trips that are already on the highway or transport networks.

West site: Office and storage buildings

- 6.19 With regards to the Greenspaces facility, approximately 35 staff will be working at the site, and the assessment suggests that 30 of the employees would travel on public transport and 5 by active modes, resulting 4 additional public transport trips. The increase in public transport trips associated with the site is not expected to have any detrimental impact on the public transport network.
- 6.20 The existing facilities operating out from the Cedar Way Industrial Estate have staff parking associated with the units and considering the proposed related facilities will be car-free except for operational parking, it is anticipated the level of vehicle trip generation is expected to decrease. Therefore, in traffic terms, the proposed development would have a positive impact on the local highway network.
- 6.21 Given the presence of existing services and the reduction in private car use related to the relocated facilities, it is considered a Freight Service Action Plan will not be required.

East site: Salt store

- 6.22 Approximately 10 staff will be working at the site, and the assessment suggests that 9 of the employees would travel on public transport and 1 by active modes, resulting in 1 London Underground trip. The increase in Underground trip associated with the site is not expected to have any detrimental impact on the public transport network.
- 6.23 The existing Environmental Service operating out from the Cedar Way Industrial Estate have staff parking associated with the units and considering the proposed related facilities will be car-free except for operational parking, it is anticipated the level of vehicle trip generation is expected to decrease. Therefore, in traffic terms, the proposed development would have a positive impact on the local highway network.
- 6.24 Given the presence of existing services and the reduction in private car use related to the relocated facilities, it is considered a Freight Service Action Plan will not be required.

- 6.25 Overall, the traffic and transport impact assessment has concluded that the proposed relocated services represent an insignificant transport/traffic impact for both sites. It has been demonstrated that there will be no adverse highways and transport impact as a result of the development as such the proposals should be considered acceptable in transport and highway terms. Accordingly, the proposals are considered to not impact the Highways, in accordance with London Plan Policies T1, T2 and T4, and Local Plan Policy T1.

Car Parking and EV Provision

- 6.26 London Plan Policy T6 states car-free development should be the starting point (except for disabled parking), and operational car parking should provide Electric Vehicle (EV) infrastructure.
- 6.27 Local Plan Policy T2 also states all new developments in the borough to be car-free.

West site: Office and storage buildings

- 6.28 The proposed development is to be car-free, except for operational LGV parking associated with the Greenspace operation and the provision of 1 disabled parking space on site.
- 6.29 2 EV passive parking bays will be provided in the eastern corner of the site to service operational vehicles associated with the service provider.
- 6.30 Vehicle swept path analysis in the Transport Statement (Appendix B) indicates that a large car can access and exit the proposed disabled bay and EV bays, and enter/exit in forward gear via Freight Lane (western access).

East site: Salt store

- 6.31 The proposed development is to be car-free, with the exception of 1 parking space for the grit loader associated with the proposed salt store. Up to 4 gritter lorries are used during the gritting periods.
- 6.32 The existing disabled car park bay located at the crossover within the CATS site will be relocated to another part of the existing CATS site.
- 6.33 With regards to EV provision, the existing Environmental Services vehicle fleet is not electric and there is no plan to electrify the Environmental Services vehicle fleet in the short/medium term. Given the proposals are for a short-term relocation of the Environmental Services and not a comprehensive redevelopment, it is considered that investment in EV charging would not be appropriate/proportionate and would represent abortive works and costs.
- 6.34 Accordingly, the proposed car parking provision is in accordance with London Plan Policy T6 and T2. An element of flexibility should be afforded for the EV provision as this is not considered to be appropriate for the Environmental Services' vehicles.

Cycle Parking

6.35 London Plan Policy T5 sets the following requirements for Use Class B2/B8 (General industrial, storage or distribution):

- Long-stay: 1 space per 500sqm (GEA)
- Short-stay: 1 space per 1,000sqm (GEA)

6.36 In addition, Camden's Transport CPG (2021) seeks an additional 20% of spaces over and above the London Plan standards to support the expected future growth of cycling for those who live and work in Camden.

West site: Office and storage buildings

6.37 For the Greenspace facility, it is proposed to provide 2 long-stay and 2 short-stay cycle parking spaces via as Sheffield stands within the proposed storage unit.

6.38 Accordingly, the proposed cycle parking provision for the west site will exceed the cycle parking requirement as set out in the London Plan Policy T5 and Camden's Transport CPG.

East site: Salt store

6.39 As staff will only be on site during the gritting periods, no cycle parking is proposed for the east site.

6.40 Based on the trip generation assessment as set out in the Transport Statement, it is estimated that none of the Environmental Services employees will be using a bike to the site. As such, it is considered that no cycle parking spaces will be required for staff.

Design

6.41 London Plan Policy D3 (A) confirms all development must make best use of land by following a design-led approach that optimises capacity of sites. London Plan Policy D3 (D) further notes that proposals are expected to respond to local context through their layout, orientation, scale, appearance, and shape, with buildings of a high standard of sustainable design and architecture whilst providing active frontages and achieving safe, inclusive environments (in line with London Plan Policy D5).

6.42 At the local level, Local Plan Policy D1 confirms the Council will seek to secure high quality design in development and requires that development, inter alia, respects local context and character and preserves or enhances the historic environment and heritage assets.

West site: Office and storage buildings

6.43 It is proposed that the office accommodation will be in a modular building form, with a circa height of 3m. This has been chosen as it is lightweight, requiring minimum foundations, quick and easy to install, meet current building regulation standards and are economic with regards construction and installation.

6.44 Through the pre-application process, the design and appearance of the proposed office building have been revised to be appropriate within the site context, such as the external sheet cladding to be in a green colour finish to blend with the existing vegetation surrounding the site, and this was accepted by WCC officer.

6.45 The storage is proposed as a single storey steel frame supported on a concrete raft slab to minimise any excavation with a circa height of 5m. Cladding to the frame will be corrugated metal sheet coloured to match the office building, and the steel frame with flat roof will allow the building to be essentially pre-fabricated off-site.

East site: Salt store

6.46 The new salt store is proposed to be of concrete ground slab and walls forming one large bay containing approximately 400 tonnes of rock salt to meet the Council's needs. The bay will have a manually operated sliding roof to ensure the interior of the bay is protected from adverse weather.

6.47 The retractable roof of the salt store allows for the overall height to be limited to circa 4m (normally a height of 9m is required for similar structures).

6.48 The bay will be gated to ensure the rock salt is secure. The gates will be steel frame with timber cladding. To support the staff operating the gritter lorries overnight in winter months, new staff accommodation is proposed, providing a kitchen, rest room and toilets in a simple modular building (for up to 6 staff).

6.49 In addition, a 40' shipping container is proposed to be used as a salt bin storage to accommodate approximately 100 bins. Salt bins are distributed around the borough during the winter season, used by street operatives to distribute salt over the pavement.

6.50 Both the modular building for staff accommodation and shipping container for the salt bin storage have been selected as they require minimum foundations, quick and easy to install, and are economic with regards construction and installation.

6.51 Overall, for both sites, the proposals have been designed to be of a utilitarian design, reflecting their function and location. Primarily, the buildings have been designed to be the minimum footprint and size required and to meet the needs of the essential Council services. Efficiency of construction is also required, to ensure a sustainable approach reflecting the intention for these facilities to be used for a relatively limited period of c. 5-10 years. The materiality of the office and store building has been selected with a green colouration, in response to pre-application feedback, reflecting the site's location in proximity to the SINC.

6.52 In addition, the sites are not in a sensitive location in townscape or heritage terms and the limited scale of the proposals will mean no material visibility from the wider surrounding area.

6.53 Accordingly, the proposals for both sites respond well to London Plan Policy D3 and Local Plan Policy D1.

Sustainable Design

- 6.54 Local Plan Policy D1 requires sustainability in design and construction and adaptability for different activities and land uses.
- 6.55 Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards.
- 6.56 The proposals are by their nature sustainable, through the provision of an efficient and functional building and facility, which meet the requirements of the user groups whilst not including additional / over-specified / unnecessary features. The proposals also incorporate the following sustainability features:
- Ground surveys will be undertaken to review whether the existing ground slabs can be used for a foundation. If not, on-site material will be retained/re-used as far as possible.
 - As the proposed staff accommodation buildings (for Greenspaces at west site and for gritter lorry drivers at west site) have been designed to be fit for purpose as functional buildings, which is unlikely to be in situ over the long term, the most sustainable approach is considered to be lightweight modular buildings with off-site pre-fabrication. The performance of the building fabric will meet Building Regulations requirements. Features in modular site buildings include:
 - Double glazed windows to achieve u-values required by the Building Regulations
 - Levels of insulation to achieve u-values required by the Building Regulations
 - Passive infra-red (PIR) sensors to operate lighting
 - LED light fittings
 - ‘A’ rated white goods
 - Thermostat / timer-controlled heating system
 - Heavy duty door closers to retain heat
 - Dual flush cisterns and non-concussive push taps to reduce water consumption
 - Timber from sustainable sources
 - Window shutters and insulated external doors
 - At the west site, a heating and cooling system will be used for the office and meeting space, and a heating and cooling systems for the canteen area. Each of these will have an outdoor, energy efficient condenser (total of 2no. condensers in total).

- At the east site, the salt store bays are necessarily made from concrete (a suitable material that will not be affected by salt corrosion and which can withstand impacts from digger scoops); however, the manually-operated canvas roof is a low-impact solution which minimises structural and materials requirements.
- 6.57 Furthermore, the feasibility of installing Photovoltaic (PV) panels on the proposed office building at the west site was considered by ScotchPartners, and their assessment is set out in the submitted Technical Note. It was concluded that 24 PV panels would be accommodated on the roof of the office building. The Annual energy output of the installation is estimated to be 8.79 MWh/year, meaning that the installation could result in an annual CO2 reduction of approximately 1,820.12 kg/CO2.
- 6.58 The proposals are therefore considered to make an appropriate response to sustainable design policy, including Local Plan Policy D1 as the modular building could be used as a future off-site second use and Local Plan Policy CC1 through the use of efficiently built modular buildings.

Trees

- 6.59 Local Plan Policy A3 requires the protection of existing trees as per BS5837:2012 'Trees in relation to Design, Demolition and Construction'.
- 6.60 A Preliminary Tree Inspection and Arboricultural Impact Assessment (AIA) have been prepared by Arboricultural Solutions in support of this application. Based on their assessment, at the west site, there are 5 existing trees that will potentially be impacted by the proposed development, however they are all located outside the boundary fence. The trees are classified as Category C (4 trees T2-T5) and Category B (1 tree T1).
- 6.61 There is an overhang to the building by the crowns of two trees (T4 and T5).
- 6.62 Excavations for the new building makes a significant encroachment into the RPA of T4 and a negligible encroachment into tree T5. Whilst there are unlikely to be any significant roots present in the development site due to the presence of a concrete slab and tarmac surfacing adjacent to the trees, special precautions will be required to ensure that if there are roots present, they are protected or severed in the correct manner.
- 6.63 As concluded in the AIA, the trees affected by the proposals are not considered to be high value and should not be used as a constraint to development. The following tree protection measures are proposed to minimise any impact:
- For T4 – the area marked as the RPA for T4 should be excavated using hand tools once the hard surface has been broken up and carefully removed by machinery. A narrow test trench can be excavated along the line of the new slab to determine if significant roots are present. The trench should be excavated to the depth of the proposed base of the hardcore to expose any roots.
 - For T4 and T5 – Cut back overhanging branches to boundary. Final cut must be at a live growth point.

- Motorised vehicles will be restricted to areas of existing compacted/hard surfaces, or where ground protection is in place, and should not be taken onto un-surfaced areas within the RPAs.
- All materials storage and mixing will be confined to areas outside the RPAs of the retained trees.
- Where mixing of materials is undertaken close to the RPAs, this should be on an impervious surface with no run-off to prevent chemical contamination of the RPAs.

Biodiversity Net Gain

6.64 Biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). However, there is a de minimis exemption for a development that does not impact a priority habitat and impacts less than:

- 25 square metres (5m by 5m) of on-site habitat
- 5 metres of on-site linear habitats such as hedgerows

6.65 Both sites are developed land, mostly comprising hardstanding and/or buildings, and there is virtually no habitat on-site. To clarify for the west site, the application site boundary excludes the green verge adjacent to Freight Lane (immediately to the south-east of the existing cabins) and the hedgerow to the north-west, and any areas of the nearby SINC to the north.

6.66 Accordingly, it is considered that the proposals fit the de minimis ex-emption and will not be required to achieve a net gain on both sites.

Neighbouring Amenity

6.67 London Plan Policy D13 (D) confirms that proposals should manage noise and other potential disturbances by ensuring good design mitigates and minimises existing potential nuisances.

6.68 Local Plan Policy A1 (and draft Local Plan Policy A1) seeks to protect and where appropriate enhance neighbouring amenity, by preventing unacceptable impacts including daylight, sunlight, and overshadowing.

West site: Office and storage buildings

6.69 Given that the sites have railways to the north and south and a concrete plant to the south, as well as being the location for existing operational activities for bus services and vehicle services, it is unlikely that the proposed plant at the west site or the proposed operational activities of either site would give rise to material noise impacts for the nearest residential receptors, within the Maiden Lane Estate to the north.

6.70 For the proposed office building, it is proposed to install 2no. condensers attached to the new heating and cooling systems. This will likely to be Mitsubishi PUMY-SP112VKM

and its data sheet has been submitted in support of this application, setting out anticipated noise level.

- 6.71 Given the site context, and that the proposed condensers are standard outdoor condensers and small in size, it was agreed with Officers through the pre-application discussion that a Noise Impact Assessment will not be required as part of the submission. Any noise impacts will be dealt via planning condition.
- 6.72 It is also noted that the existing Greenspaces functions are being carried out at the Cedar Way estate, in proximity to homes within Elm Village, on the other side of Camley Street.
- 6.73 In terms of lighting, background lighting exists on the site and will be retained and extended as required over the site. These will be LED lights shining down, to minimise sky glow or glare from the site, and be set at a level of 10-15 Lux, a lower light level than street lighting (usually set at 20 Lux). The lights will be operated on daylight and movement sensors to ensure they are only operational when essential.

East site: Salt store

- 6.74 For the east site, the operation of the salt/gritter lorries will only be limited during the winter months and only when it is necessary times, depending on the weather.
- 6.75 In terms of lighting, the existing lighting will be retained with one additional LED downlight to be used if required by the scoop operator when loading salt at night. This light will be shielded to shine down and have an illumination level of approximately 15 Lux, approximately 5 Lux lower than that found on main roads.
- 6.76 Accordingly, the proposals will not cause any material neighbouring amenity impacts and will therefore comply with London Plan Policies D13 (D), Local Plan policy A1 (and draft Local Plan Policy A1).

Flooding and Drainage

- 6.77 London Plan Policy SI12 requires flood risk to be managed and Policy SI13 seeks the incorporation of sustainable drainage.
- 6.78 At local level, Local Plan Policy CC3 requires developments to reduce flood risk where possible and utilise Sustainable Drainage System (SuDS) in line with the drainage hierarchy.
- 6.79 A Drainage Report has been prepared by MWP in support of the applications, setting out drainage strategy for both sites:

West site: Office and storage buildings

- Surface water and foul water will be connected to the existing private sewer through a new manhole installed on the existing surface and foul pipes.

East site: Salt store

- The drainage plan involves channelling surface water runoff from the vehicle wash facility to a demarcation manhole located at the southwest corner of the site.

- This process will include treatment through a bypass separator or a wastewater treatment plant to remove pollutants, such as hydrocarbons, from the runoff. The treated water will then be discharged into the public sewer, pending approval from Thames Water under S106 connection requirements and effluent discharge regulations.
- 6.80 Further to the above, a detailed assessment has been undertaken to assess the feasibility of SuDS measures, in line with the London Plan's surface water drainage hierarchy.
- 6.81 However, there are a number of limitations imposed by the site's existing condition and constraints, such as insufficient space to provide ponds or adequate water storage and no viable watercourses. The use of infiltration techniques (such as porous surfaces in non-clay area) was also considered, however it was deemed that the infiltration rates may be low as the ground around the site is made up of clay, and there will be no percolation of runoff as the paving will be lined in the central courtyard.
- 6.82 Accordingly, the only feasible measure as set out in the drainage hierarchy would be to discharge rainwater to a surface water sewer/ drain at existing rate of 63.69l/s in a 1 in 100-year plus 40% climate change event.

7. Summary and Conclusions

- 7.1 The planning applications seek to secure full planning permission for the following developments:

West site:

Removal of single storey modular building; erection of a single-storey office and welfare building and a single-storey storage building, provision of on-site car parking, and associated works.

East site:

Erection of a salt store, a salt bin store and modular cabin with WC and staff kitchen and associated works.

- 7.2 This Planning Statement has demonstrated how the proposals have been developed in consideration of the planning and surrounding context and are considered to be in accordance with National Planning Policy and the local Development Plan.
- 7.3 Overall, the proposals seek to provide facilities for Council services, which are to be relocated from the Cedar Way industrial estate to the two council-owned sites on Freight Lane. The proposals will provide improved space for the essential Council services in accordance with the design brief. As a wider point, though not the subject of this application, this relocation of council services will allow for vacation of current premises on Camley Street, allowing for redevelopment of the Camley Street CIP sites in due course, with significant associated benefits.
- 7.4 In summary, the proposals for the site are considered to be in accordance with the planning policies of the NPPF, London Plan and Camden Local Plan, and we therefore respectfully request that planning permission is granted.

Turley Office
Brownlow Yard
12 Roger Street
London
WC1N 2JU

T 020 7851 4010