

# Camden Goods Yard, Chalk Farm Road

Local Planning Authority: Camden

Local Planning Authority reference: 2025/0939/P

**Strategic planning application stage 1 referral**

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

**The proposal**

A Section 73 application to amend elements of approved detailed planning permission for the Camden Goods Yard site. Amendments include a reduction from 644 homes to 637 homes; a reduction in affordable homes from 203 units to 83 units (totalling a change in the percentage of affordable housing from 38.1% to 15%); and design changes (including minor changes to building heights and footprints) to accommodate the proposed change in housing mix, the provision of additional staircases in Blocks C, E1 and F and the relocation of escape stairs for the supermarket.

**The applicant**

The applicant is **St George West London Ltd** and the architect is **Allies and Morrison**.

**Strategic issues summary**

**Land use principles:** The principle of the proposed residential-led mixed use redevelopment of the site in this town centre location is supported.

**Affordable housing:** The proposal includes 83 affordable housing units (15% by habitable room) with a tenure split of 39% low-cost rent and 61% intermediate housing. A viability assessment is being robustly interrogated by GLA officers. Early, mid and late-stage reviews are required.

**Urban design and heritage:** There are no strategic urban design issues arising from the proposals. While the proposed design changes are limited in scope, the proposals result in a change in the public benefit package through the reduction in affordable housing given to the scheme. The proposals result in less than substantial harm to heritage assets, as described in this report. The applicant's viability assessment is currently being reviewed by GLA Officers. Subject to agreeing and securing the public benefits, the less than substantial harm identified above would be outweighed by the public benefits of the scheme. An update will be provided at decision making stage. Other issues on **transport, environment** and **sustainable infrastructure** also require resolution prior to the Mayor's decision making stage.

**Recommendation**

That the Camden Council be advised that the application does not comply with the London Plan for the reasons set out in paragraph 46. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 3 April 2024, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in issuing his response.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
  - 1A "*Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats*";
  - 1B "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres."
  - 1C (c): 'Development which comprises or includes the erection of a building more than 30 metres high outside the City of London.'
3. Once the Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planapps.london.gov.uk>

## Site description

6. The site is 3.3 hectares in size is located in Camden Town Centre (Major Centre) and comprises two parts on land split (east/west) by the London Overground line. The 'main site' (west of the overground), previously comprised a supermarket and surface car parking, has been cleared. The smaller site comprises a petrol filling station (operated by Morrisons)
7. The Regents Canal Conservation Area incorporates the smaller part of the site. There are several other heritage assets, including conservations areas, in close proximity to the site. The viewing corridor of protected London Panorama 2A.2 from Parliament Hill summit to the Palace of Westminster traverses approximately half of the application site.

8. The site has a Public Transport Accessibility Level (PTAL) ranging from 5 to 6a on a scale of 0 – 6b where 6b is the highest.

## **Details of this proposal**

9. The application proposes the variation of Conditions 3, 4, 5, 6 (approved drawings and documents) and 73 (number and mix of residential units) of planning permission 2017/3847/P dated 15/6/18 (as amended by permission refs. 2020/0034/P, 2020/3116/P and 2022/3646/P) to secure amendments including: a reduction in the number of homes; a reduction in the percentage of affordable housing; alterations to the mix of homes provided; an increase to the building footprint of Block E1; reductions to the heights of Blocks C, E1, E2 & F; an increase in the height of Block D to accommodate a lift overrun; provision of additional staircases to Blocks C, E1 and F; and relocation of escape stairs for the supermarket. This application is accompanied by an addendum to the original Environmental Statement.

## **Strategic case history**

10. On 18 July 2018, Camden Council granted planning permission for an application (LPA ref: 2017/3847/P) for the redevelopment of the petrol filling station site to provide a six-storey building comprising a replacement petrol filling station, retail and office uses. Redevelopment of the main supermarket site to include the erection of seven buildings ranging in height up to 14 storeys accommodating up to 573 residential units together with a supermarket, retail, offices and workshops, and a community centre. The Mayor of London had previously advised the Council on 9 April 2018 that he was content to allow Camden Council to determine the case itself, subject to any action that the Secretary of State may take, and did not therefore wish to take over the application for his own determination (GLA ref: GLA/4158/JF03).
11. Since the original application there have been three Section 73 applications (2020/0034/P, 2020/3116/P, and 2022/3646/P) been approved by Camden Council. The GLA has concluded in response to these three Section 73 applications “that the amendments do not give rise to any new strategic planning issues” (GLA ref: GLA/4158a, 2020/6198/NSI, 2022/0665/S1). There have also been fifteen Section 96A applications that have been approved by the Council. These applications have resulted in an increase in housing provision to 644 homes including an increase of affordable homes to 203 (up from 184 as originally approved).

## **Strategic planning issues and relevant policies and guidance**

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021 and Camden Local Plan 2017.
13. The following are also relevant material considerations:

- Camden Goods Yard Planning Framework (2017)
- The National Planning Policy Framework and National Planning Practice Guidance; and,
- Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on housing, affordable housing, viability, design green infrastructure, natural environment and transport which can be found on the GLA's website [here](#).<sup>1</sup>

## Land use principles

14. The principle of the proposed residential-led mixed use redevelopment of the site in this town centre location is supported and established by the original planning permission on the site (Ref: 2017/3847/P, GLA/4158).

## Affordable housing

15. The proposal includes the reduction in affordable housing provision from the extant planning permission. Specifically, there a reduction from 203 affordable housing units (38.1% by habitable room, with a tenure split of 66% London Affordable Rent and 34% intermediate rent) to 83 affordable housing units (15% by habitable room, with a tenure split of 39% low-cost rent and 61% intermediate product), as outlined below:

Tenure	Total Units	Percentage (%)	Total Habitable Rooms	Percentage (%)
<b>Low-Cost Rent</b>				
London Affordable Rent	23	4%	96	6%
<b>Intermediate Rent</b>				
Intermediate Rent	60	9%	150	9%
Total affordable	83	13%	246	15%
<b>Market</b>				
Build for Sale	554	87%	1,423	85%
Total	637	100%	1,669	100%

16. In line with Policy H5, the financial viability assessment is being robustly scrutinised by GLA officers in order to maximise the affordable housing delivery. Early, mid and late-stage reviews are required.

<sup>1</sup> <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

## Urban design

17. The proposed design changes are relatively minor in nature and are necessary to meet fire safety requirements, and to propose a new housing and tenure mix. There are no strategic urban design issues arising from the proposals.

### Fire safety

18. A fire statement has been submitted with the planning application. The accompanying fire statement form demonstrates that the statement has been prepared suitably qualified third-party assessor; the fire statement should be amended to include this detail. The statement should also be amended to confirm whether the requirements of Policies D12 and D5 of the London Plan are complied with, and the Council should secure all proposed measures by appropriate conditions. The application confirms that for means of escape, blocks over 18m in height will be provided with two escape stairs.

## Heritage

19. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
20. GLA Officers recognise that less than substantial harm was identified by Camden Council in the approval of the original planning permission and subsequent Section 73 applications to designated heritage assets (the Grade-I listed Regent's Park, the Grade-II\* listed Horse Hospital and its associated structures, the Grade-II\* listed Roundhouse, Parkhill Conservation Area, Primrose Hill Conservation Area and Harmood Street Conservation Area). GLA Officers agree with those conclusions of Camden Council LPA in respect of the level of harm, and consider that the minor design changes sought via the proposed scheme do not materially change the level of harm arising to the designated heritage assets.
21. The proposal includes a number of public benefits including housing and affordable housing. Subject to the proposed public benefits being agreed with, and satisfactorily secured, the less than substantial harm identified as arising from the proposals would be outweighed by the public benefits of the scheme. An update will be provided at Stage II decision making stage.

## Environment and sustainable infrastructure

### Energy strategy compliance and carbon savings

22. An energy statement has been submitted with the application. The energy statement does not yet comply with the London Plan. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

- Be Lean – further exploration of energy efficiency measures for the non-domestic element;
- Be Clean – demonstration that the number of energy centres has been minimised;
- Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
- Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
- Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
- Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

23. For the domestic element, the development is estimated to achieve a 75% reduction in CO2 emissions compared to 2021 Building Regulations. For the non-domestic element, a 5% reduction is expected.

24. The development falls short of the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

### Whole life-cycle carbon

25. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2. Detailed comments have been circulated to the applicant and the Council, which should be addressed prior to the Mayor's decision making stage. To summarise, further information is required on operational modelling methodology, details of the

review process undertake to confirm cost per building, estimated WLC emissions, key actions and further opportunities to reduce whole life-cycle carbon emissions, and material quantity, assumptions and end of life scenarios.

26. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)<sup>2</sup>.

### Circular economy

27. The applicant has submitted a Circular Economy Statement which does not yet comply with London Plan Policy SI7. Detailed comments have been circulated to the applicant and the Council, which should be addressed prior to the Mayor's decision making stage. To summarise, further information is required in relation to the pre-demolition audit, design principles, bill of materials, recycling and water reporting, operational waste, circular economy targets, post construction report and end of life strategy.
28. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)<sup>3</sup>.

### Urban greening and biodiversity

29. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.22 which falls beneath the target score of 0.4. Additional opportunities to increase the urban greening should be explored, and the Council should secure all greening measures to ensure the target is met.
30. The applicant has not demonstrated a biodiversity net gain and this aspect does not comply with the London Plan. Further measures to secure a biodiversity net gain should be explored and secured within any planning permission.

### Sustainable drainage and flood risk

31. The flood risk assessment (FRA) for the proposed development, was drafted in 2017 and does not comply with London Plan Policy SI.12. Additional information is required regarding insert to demonstrate conformity.
32. Specifically, the Morrisons supermarket and car park (MS parcel) is at low risk of surface water flooding, however, the Petrol Filling Station (PFS parcel) is at high risk of surface water flooding. The FRA does not demonstrate if there is a safe access/egress route to the MS parcel during a surface water flood event. This should be addressed to ensure compliance with London Plan Policy SI12.

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<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

<sup>3</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

33. The sustainable urban drainage strategy generally complies with London Plan Policy SI.13.
34. The proposed development meet does not currently meet the requirements of London Plan Policy SI.5. Additional water efficiency information for the residential components of the development should be provided to demonstrate conformity.

#### Air quality

35. The applicant has provided an air quality assessment which concludes that the scheme would be air quality neutral. An Air Quality Positive Assessment has been undertaken, which is acceptable. The Council should identify all appropriate mitigation and appropriately secure these as part of any future planning permission. On this basis, the development is generally compliant with London Plan Policy SI1.

### **Transport**

#### Trip generation and principle of development

36. The previously agreed number of delivery and servicing bays will be provided and is acceptable. There would be no significant additional uplift in public transport or active travel trips and no mitigation is required.

#### Car and cycle parking

37. There are 638 long stay cycle parking spaces now proposed for the residential blocks, an increase from 593 as previously consented, as well as 146 short stay spaces are proposed in public realm areas. This meets London Plan Policy T5 and should be secured by condition.
38. The residential blocks in scope remain proposed as car free except for 18 Blue Badge spaces, 11 in Block F's car park and 7 on-street. 2 Car Club bays will serve future residents and visitors, which is supported. 20% of the proposed car parking will have active electric vehicle charge points and there will be passive provision for all remaining spaces in accordance with London Plan Policy T6.

#### Bus and vehicular access

39. A new internal highway layout and upgraded site access is being implemented to a design agreed with TfL and the Council, and it is essential to enable reinstatement of the 27 and 393 bus services on site. A lease agreement with TfL is required to formalise long-term bus access and operations.
40. The proposed amended scheme retains the agreed scheme for replacement bus stops and stands, which are provided within the site in the form of laybys on Juniper Crescent / Stephenson Street along with an overflow bay on the northbound exit from the new internal mini roundabout. This is supported.



41. Noting that all temporary and permanent bus arrangements are retained with the proposed amendments, the bus compensation payments package with TfL must be settled and concluded with the extended construction programme. Agreed terms and rates for the compensation are subject to a parallel legal agreement with the applicant from 2021.
42. To safeguard bus operations and infrastructure on private land, there is a retained need for a 'Bus Infrastructure Safeguarding Plan' so that the applicant will enter a lease for the permanent bus stops and stands within the site. The applicant should engage further with TfL on this matter.

### **Local planning authority's position**

43. Camden Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

### **Legal considerations**

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

### **Financial considerations**

45. There are no financial considerations at this stage.

### **Conclusion**

46. London Plan policies on town centres, housing, affordable housing, viability, design, heritage, fire safety, environmental issues and sustainable infrastructure are relevant to this application. Whilst the proposal is supported in principle, the application does not currently comply with these policies, as summarised below:

- **Land Use Principles:** The principle of the proposed residential-led mixed use redevelopment of the site in this town centre location is supported.
- **Affordable housing:** The proposal includes 83 affordable housing units (15% by habitable room) with a tenure split of 39% low-cost rent and 61%

intermediate housing. A viability assessment is being robustly interrogated by GLA officers. Early, mid and late-stage reviews are required.

- **Urban design and heritage:** There are no strategic urban design issues arising from the proposals. While the proposed design changes are limited in scope, the proposals result in a change in the public benefit package through the reduction in affordable housing given to the scheme. The proposals result in less than substantial harm to heritage assets, as described in this report. The applicant's viability assessment is currently being reviewed by GLA Officers. Subject to agreeing and securing the public benefits, the less than substantial harm identified above would be outweighed by the public benefits of the scheme. An update will be provided at decision making stage.
- **Environment and sustainable infrastructure:** Detailed comments have been circulated to the applicant and the Council regarding energy, circular economy and whole life-cycle carbon matters which should be addressed prior to the Mayor's decision making stage. Additional opportunities to increase the urban greening should be explored and the Council should secure all greening measures to ensure the target is met. Further measures to secure a biodiversity net gain should also be explored and secured. Additional information is also required in relation to flood risk and water efficiency to demonstrate compliance with the London Plan.
- **Transport:** There is no additional uplift in public transport, active travel trips or deliveries requiring mitigation as a result of proposed changes to the residential mix. A lease agreement with TfL is required to formalise long-term bus access and operations. A 'Bus Infrastructure Safeguarding Plan' must be retained for the current proposals.

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