

79 CAMDEN ROAD  
& 86-100 ST PANCRAS WAY  
planning statement

November 2013



by CBRE



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# 1.0 Introduction

- 1.1 This Planning Statement has been produced by CBRE Planning to accompany the planning application for the redevelopment of 79 Camden Road and 86-100 St Pancras Way ("the site"), on behalf of Barratt West London (BWL) ("the applicant").
- 1.2 BWL's proposals will redevelop the vacant site for a residential scheme providing 166 new homes, of which 84 are affordable. The proposed development comprises:

*"Redevelopment of the site to create 166 residential units (Class C3), including affordable housing, following demolition of all existing buildings on the site (Class B1) and construction of a new building ranging from 5 to 7 storeys in height, together with associated works to create a lower ground floor, landscaping and public realm improvements".*

## Background to the Site's Redevelopment

- 1.3 The site is currently under the ownership of the London Borough of Camden ("LB Camden") and comprises a series of interlinked office buildings (79 Camden Road, 86 - 100 St Pancras Way).
- 1.4 The buildings are now completely vacant and were last occupied by Camden Council for B1(a) offices. Further details of the site and its Planning History and lawful use are set out in Sections 2 and 3 of this Statement, respectively.
- 1.5 The site was marketed on behalf of Camden, by Deliotte Real Estate (DRE), in September 2011 following Camden identifying the accommodation as surplus to the Council's requirements. Through a competitive tendering process, BWL was selected to continue the site's promotion and, subject to grant of planning permission, to bring forward its regeneration.

## The Proposals and their Consultation

- 1.6 The proposals will deliver 166 new, high quality homes in the Canteloves Ward across a range of unit sizes, including family units. Significantly, 84 of these units (equating to approximately 50% of total GEA floorspace) will be affordable accommodation.
- 1.7 All of the new homes benefit from a private balcony or terrace, in addition to, landscaped courtyards providing tranquil amenity space at lower ground and communal roof terraces, providing recreation and playspace at roof level. A full description of the proposed development is provided at Section 4.
- 1.8 The applicant and their development team have undertaken extensive pre-planning application discussions and consultation over the past eleven months. This is in addition to negotiations with LB Camden's Property and Housing Teams as part of the bid process. Section 5 of this Statement provides details and a summary of pre-application feedback, including the applicant's responses to comments received.
- 1.9 From concept to detailed design, significant regard has been had to the surrounding urban context, including the impact on the setting of and view from the four Conservation Areas in proximity to the site. The proposals will be of the highest quality, enhancing the townscape in the area whilst creating a distinctive character to the site which recognises and responds appropriately to the different character of its Camden Road, St Pancras Way and Rochester Place frontages.
- 1.10 The proposals accord with all key relevant planning policies and guidance (detailed in Section 6) and have responded to extensive feedback from LB Camden Officers, other statutory consultees and public consultation.

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- 1.11 The compelling case for the proposed development is robustly assessed against policy in Section 7.

## Scope of Submission

- 1.12 This Planning Statement should be read in conjunction with other documents forming part of the same submission and comprise:
- Drawing Package (including Existing, Demolition and Proposed Plans, Elevations and sections and Landscape Plans) prepared by Sheppard Robson Architects and Outerspace (see drawing schedule on following page);
  - Design and Access Statement prepared by Sheppard Robson;
  - Access & Inclusivity Statement prepared by All Clear Design;
  - Townscape and Visual Impact Assessment prepared by Peter Stewart Consultancy
  - Employment Statement prepared by CBRE Planning;
  - Affordable Housing Statement prepared by CBRE Planning;
  - Statement of Community Involvement by Hardhat Communications;
  - Heritage Statement prepared by Heritage Collective;
  - Transport Assessment prepared by SKM Colin Buchanan ;
  - Travel Plan prepared by SKM Colin Buchanan;
  - Draft Construction Management Plan prepared by URS;
  - Waste and Recycling Strategy by URS;
  - Noise Assessment by URS;
  - Air Quality Assessment by URS;
  - Phase 1 Habitat Survey by URS;
  - Arboricultural Report by Unwin Forestry Consultancy;
  - Energy Strategy Overview (including Code for Sustainable Homes Pre-Assessment) Whitecode Design Associates;
  - Sustainability Statement by Whitecode Design Associates;
  - Basement Impact Assessment by Card Geotechnics Limited;
  - Surface Water Drainage Statement by URS;
  - Archaeological Desk Based Assessment prepared by URS;
  - Pedestrian Level Wind Microclimate Assessment Desk Study prepared by RWDI;
  - Internal Sunlight and Daylight Report prepared by GIA; and
  - External Sunlight and Daylight Report prepared by GIA.

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## Drawing Schedule

Drawings	Number	Drawing Name	A3	A1
Existing Drawings	4998-00-001	Site location plan	1:1000	
	4998-00-002	Existing site plan at basement level	1:500	
	4998-00-003	Existing site plan at ground floor level	1:500	
	4998-00-004	Existing site plan at first floor level	1:500	
	4998-00-005	Existing site plan at second floor level	1:500	
	4998-00-006	Existing site plan at third floor level	1:500	
	4998-00-007	Existing site elevations	1:500	
Demolition Drawings	4998-00-011	Demolition plan at basement level	1:500	
	4998-00-012	Demolition plan at ground floor level	1:500	
	4998-00-013	Demolition plan at first floor level	1:500	
	4998-00-014	Demolition plan at second floor level	1:500	
	4998-00-015	Demolition plan at third floor level	1:500	
	4998-00-016	Demolition elevations	1:400	
GA Drawings	4998-20-101	Proposed lower ground floor plan	1:400	1:200
	4998-20-102	Proposed ground floor plan	1:400	1:200
	4998-20-103	Proposed first floor plan	1:400	1:200
	4998-20-104	Proposed second floor plan	1:400	1:200
	4998-20-105	Proposed third floor plan	1:400	1:200
	4998-20-106	Proposed fourth floor plan	1:400	1:200
	4998-20-107	Proposed fifth floor plan	1:400	1:200
	4998-20-108	Proposed sixth floor plan	1:400	1:200
	4998-20-109	Proposed roof plan	1:400	1:200
	4998-20-119	Street elevations - Camden road and St Pancras way	1:400	1:200
	4998-20-120	Street elevations - North west and Rochester place	1:400	1:200
	4998-20-121	Long sections CC & DD	1:400	1:200
	4998-20-122	Cross sections AA, HH & BB	1:400	1:200
4998-20-123	Cross sections EE, FF & GG	1:400	1:200	
4998-20-130	Detail bay studies Camden Road	1:100	1:50	
4998-20-131	Detail bay studies St Pancras Way	1:100	1:50	
4998-20-132	Detail bay studies Rochester Place	1:100	1:50	
4998-20-133	Internal courtyards	1:100	1:50	
Landscape drawings	LN00332-100	Masterplan (Colour)	1:400	1:200
	LN00332-200	External Groundfloor - Public Realm	1:400	1:200
	LN00332-201	External Groundfloor - Courtyards	1:200	1:100
	LN00332-202	5th Floor - Roof Gardens	1:200	1:100
4998-00-901	Accommodation Schedule	NTS	NTS	

# 1.0 Introduction

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## 2.0 Site and Surrounds

### THE SITE

#### Site Description

- 2.1 The application site is located at the junction of Camden Road and St Pancras Way, to the north-east of Camden Town Centre, within the London Borough of Camden (“LB Camden”).
- 2.2 It is bound to the north-east by Rochester Place, to the south-east by Camden Road (A503), to the south-west by St Pancras Road (A502) and by buildings constituting 102 St Pancras Way to the north-west.

Figure 2.1 Site Red Line Plan



- 2.3 The 0.42 hectare site covers almost three quarters of an urban block.
- 2.4 To the north and west the site is built out to its boundaries. The building line of the St Pancras Way frontage is set back from the back of the footway beyond a hard surfaced forecourt, for goods vehicle access and car parking. Whilst the Camden Road frontage is also set back behind a hard surfaced area.
- 2.5 The site comprises a series of interlinked elements of different heights built at different points in time, which can be described as two addresses: 86 – 100 St Pancras Way and 79 Camden Road.
- 2.6 The main building fronting St Pancras Way (No. 86 – 100) comprises a three storey 1930s central block, plus lower ground with two subservient wings of two storeys, with lower ground. The west and east extensions are understood to have been added circa. 1939 and

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- 1948, respectively. The central block has separate one, two and three storey elements behind it which create a continuous, mostly one storey frontage along Rochester Place creating a mews-like “rear” elevation which sits directly at the back of the footway.
- 2.7 The main building is linked via a two storey 1960s extension to 79 Camden Road. This is a four storey, with lower ground floor, 1960s block which forms a continuous built edge along this facade. There are a number of semi-mature trees outside this facade.
  - 2.8 Whilst the natural topography of the site is relatively flat, the gradient of the site drops from north-east to south-west by approximately 1-1.25m.
  - 2.9 The site has excellent accessibility to public transport with a Public Transport Accessibility Level (PTAL) of 6a. The site benefits from Camden Road being a bus corridor, with an existing bus shelter accommodated outside the Camden Road facade serving northbound services towards Hackney and Wood Green. Southbound services towards Euston and Trafalgar Square are accessed from an existing shelter location south of the junction with St Pancras Way.
  - 2.10 Camden Road Overground Station and Camden Town Underground Station are both also within comfortable walking distance of the site, servicing the Richmond/Clapham Junction London Overground route and the Northern Line, respectively.

### SURROUNDING AREA

- 2.11 The site is immediately surrounded by predominately residential uses, with some retail ground floor frontage (in particular, to the south-east) and scattered commercial uses along Camden Road and the surrounding mews.
- 2.12 Five and six storey post-war housing blocks are located immediately to the site’s south and east, on the opposite sides of St Pancras Way and Camden Road. A later, three storey residential development fronts Camden Road and is on the opposite side of Rochester Place to the site’s north-east (Nos. 77 – 86 Camden Road). Behind this, a two and three storey high 1970s residential scheme fronts Rochester Mews. The remainder of the Mews are occupied by a mix of residential, with intermittent commercial units on the ground floors.
- 2.13 At it’s north-west boundary the site adjoins 102 St Pancras Way, a two to three storey former industrial building which is now occupied by a television production company. Beyond which a pair of converted semi-detached century villas front St Pancras Way, and turn the corner onto Wilmott Place.
- 2.14 Whilst the wider area retains pockets of 19th century residential development (see surrounding Conservation Areas, below), a number of urban blocks along Camden Road and St Pancras Way have been subject to twentieth century redevelopment creating a range of scales and types of development.
- 2.15 The wider area provides for a number of services and facilities. Camden and Kentish Town Centres are located approximately 650 metres from the site, whilst a parade of neighbourhood shops are provided along Camden Road to the immediate south-east. There are a number of schools, health services and community facilities within proximity to the site.
- 2.16 In addition, a number of open parks are located in proximity to the site, including Rochester Terrace Gardens (300 metres from the site).

## 2.0 Site and Surrounds

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### Surrounding Heritage

- 2.17 The site falls outside of, but is in close proximity to four Conservation Areas: Camden Broadway (50 metres) to the south-east, Jeffrey's Street (50 metres) to the west, Rochester Conservation Area (50 metres) to the north-west and Camden Square (50 metres) to the north-east.
- 2.18 Four Grade II Listed Buildings are also located in vicinity of the site, these include: the terrace at 108 – 132 St Pancras Way to the west/north-west within the Jeffrey's Street Conservation Area; 157 – 159 St Pancras Way, including their railings, to the south/south-east and within the Camden Broadway Conservation Area, a drinking fountain on Royal College Street and a K2 telephone kiosk, both to the west/north-west within the Jeffrey's Street Conservation Area.
- 2.19 The granite setts along Rochester Place have been nominated within LB Camden's draft Local List.



## 3.0 Planning History and Lawful Use

- 3.1 This section provides an overview of the application site’s relevant planning history and its lawful use.

### SITE PLANNING HISTORY

- 3.2 Camden’s Planning Application Register provides records of planning applications post-1947. Research set out within the Heritage Statement, which accompanies this planning submission, indicates 86 – 100 St Pancras Way was built in 1931, with the west and east extensions added in circa. 1939 and 1948, respectively. Thus there is no record of the development on Camden’s Planning Register.
- 3.3 The more modern block fronting Camden Road is understood to be a 1960s construction. Whilst it is shown to be in situ by 1975 in a plan for redevelopment of the adjacent site at 77 – 83 Camden Road (LPA Ref: 21310), there is no formal record of the original planning permission for the block on Camden’s Planning Register.
- 3.4 The following records of planning applications at the site’s are available, however, the amount of information accompanying and explaining the permissions varies:
- An application for conditional permission dated 22<sup>nd</sup> May 1980 for the sub-division and change of use of the existing light industrial building for an office and light industrial buildings for the Association of Scientific, Technical and Managerial Staff (Marked A on the submitted drawings) and a light industrial building (Marked B on the submitted) drawings was registered in 18<sup>th</sup> December 1980 (Ref: CTP/H12/1).
    - There is no record of any decision notice, however, based on the existing gross floorspaces stated within the application form which accompanied the 1991 permission (below) it is assumed that this was approved and implemented.
  - Planning permission was granted for use of the building described at 79 Camden Road and 86-100 St. Pancras Way for use of the existing buildings for any purpose within Class B1 of the TCPO 1987 on 31<sup>st</sup> January 1991 (LPA Ref: 9100126);
    - According to the planning application form accompanying that application, it is understood that parts of the building had previously been subject to a restriction on the type of Class B1 uses.
    - The floorplans accompanying the application indicate that the entirety of the second and third floors of 86 – 100 St Pancras Way and 79 Camden Road were used for offices. The majority of the first and ground floor were also used for offices, with the exception of an area on the first floor (fronting St Pancras Way) used for “Research” and an area at ground floor (towards Rochester Place) used for print works/ reproduction area (see Appendix 1 for floorplans).
  - Planning permission was granted for the temporary change of use of part of the ground floor of 79 Camden Road from offices (B1(a)) to doctors' surgery (D1), internal alterations and redevelopment of the loading bay into ancillary office accommodation, with roof mounted air conditioning plant above, on 17<sup>th</sup> September 2002 (Ref: PEX0200664);
    - Condition 1 of the associated Decision Notice limited the temporary change of use until 31<sup>st</sup> December 2005, following which use of the premises would revert to the original use as local government offices;
    - This consent was intended to cover the duration of the redevelopment of Kentish Town Health Centre, 2 Bartholomew Road;

### 3.0 Planning History and Lawful Use

- The existing floorplans accompanying the application indicate that the reproduction area, including the loading bay (at ground floor), that existed in the 1991 plans, had been removed (see Appendix 1 for floorplans).
  - Consent was granted on 14<sup>th</sup> June 2006 to enable extension of the temporary GP surgery use (D1) until 31<sup>st</sup> December 2008, as redevelopment of the Kentish Town Health Centre took longer than expected (Ref: 2006/1860/P).
  - Condition 1 attached to the permission for extension of temporary use (LPA Ref: 2006/1860/P) stated the use shall revert back to B1(a) offices.
- 3.5 There have also been a number of minor applications related to external alterations of the building, including most recently:
- Planning permission granted for the replacement of windows and curtain wall to Camden Road, St Pancras Way and Rochester Place elevations was granted on 22<sup>nd</sup> March 2005 (Ref: 2005/0293/P); and
  - Planning permission granted for replacement of the existing fronting entrance ramp to comply with new DDA Regulations was granted on 31<sup>st</sup> January 2005 (Ref: 2004/4949/P).
- 3.6 In addition a number of applications related to the display of free-standing non-illuminated signage were submitted between 1982 and 1992.

#### LAWFUL USE

- 3.7 The site was last occupied by the Council for B1(a) offices, with some ancillary public facilities. The Council’s records indicate that 79 Camden Road and 86 St Pancras Way were vacated in Spring 2010 by Camden Social Services. Camden Parking Solutions occupied 100 St Pancras Way until Summer 2012.
- 3.8 From the abovementioned planning history and Council leasehold and freehold records it is understood that the buildings had been in occupation for office (B1(a)) use and ancillary facilities for a minimum of ten years and this is further detailed below.

#### Occupation as Offices (Use Class B1(a))

- 3.9 The 1991 decision (LPA Ref: 9100126) established the lawful use of the site for any uses within Class B1. The abovementioned floor plans (Appendix 1) indicate that the majority of the building was in occupation for B1(a), save the area on the first floor (fronting St Pancras Way) used for “Research” and an area at ground floor (towards Rochester Place) used for print works/ reproduction area (B(c) uses) which given the scale of these areas would have been ancillary to the primary B1(a) use of the building.
- 3.10 In 1991, Camden Council took a lease of all the accommodation within 79 Camden Road as offices (B1(a)) for its social services department.
- 3.11 In 1994, the Council purchased the freehold of the entire site (including 86 – 100 St Pancras Way). At the time of purchase 86 – 100 St Pancras was occupied by two commercial tenants:
- Courtaulds Clothing Ltd – basement and ground floor (under a 15 year lease from 25/06/1988);
  - Allopen Ltd – second floor (under a five year lease from 31/03/1992);
- 3.12 The third floor was understood to be vacant.

## 3.0 Planning History and Lawful Use

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- 3.13 Courtaulds Clothing Ltd, a lingerie manufacturer, were the last non-office occupier to vacate the site. It is understood they had vacated prior to their lease expiry (June 2003).
- 3.14 This is evident from the floorplans attached to the 2002 application for temporary change of use of the ground floor of 79 Camden Road for doctor's surgery, which indicate the presence of offices on the basement and ground floors (Appendix 1).
- 3.15 Moreover, Condition 1 attached to the planning permission for temporary change use of 650 sq m of the ground floor of 79 Camden Road for doctor's surgery (LPA Ref: PEX0200664) specifically states that following expiry of the temporary consent the use shall revert back to use as local government offices, confirming the ground floor had been in occupation by the Council at that point in time. In addition, Condition 1 attached to the permission for extension of temporary use (LPA Ref: 2006/1860/P) states the use shall revert back to B1(a) offices.
- 3.16 Having regard to the planning history set out above, it is thus considered that the existing lawful use of the site is B1(a) offices.





## 4.0 The Proposals

### OVERVIEW

- 4.1 The planning application proposes the demolition of the existing, vacant office accommodation and redevelopment of the site to provide a high quality residential development, where 50% of floorspace will be affordable. The concept and design has been informed by extensive pre-application discussions with LB Camden Planning, Housing and Design and Conservation Officers, as well as community consultation that has taken place between January 2013 and November 2013 (discussed in full in Section 5).
- 4.2 The application seeks planning permission for:

*“Redevelopment of the site to create 166 residential units (Class C3), including affordable housing, following demolition of all existing buildings on the site (Class B1) and construction of a new building ranging from 5 to 7 storeys in height, together with associated works to create a lower ground floor, landscaping and public realm improvements”*

### DEMOLITION

- 4.3 The proposed development includes the demolition of all existing buildings at the site and the levelling of the site at its lowest point (St Pancras Way).
- 4.4 All of the existing buildings proposed for demolition are vacant, with the individual buildings vacated at different points over the last two and a half years.

### REDEVELOPMENT

- 4.5 The proposed development includes:
- Provision of 166 new residential units comprising a range of unit sizes:
    - 50 x 1 bed units;
    - 99 x 2 bed units;
    - 14 x 3 bed units; and
    - 3 x 4 bed units.
  - 1,950 sq m private amenity space to be provided in the form of a private balconies and terraces for every unit;
  - Approximately 914 sq m of communal amenity space to be provided in two landscaped courtyards at base and two roof-top courtyards, incorporating 110 sq m of child’s play space;
  - Incorporation of high standards of sustainability and on-site renewable energy provision. All units will seek to achieve Code for Sustainable Level 4. 70kWe CHP and 13 kWp photovoltaics are also included;
  - No car parking spaces (“Car Free”), save for the provision of two disabled car parking spaces; and
  - On-site cycling provision for 296 bicycles for residents and their visitors.

### Proposed Floorspace

- 4.6 LB Camden’s CPG2 (Housing) identifies that there are different definitions of floorspace based on Gross External Area, Gross Internal Area and Net Internal Area. Each of these are

## 4.0 The Proposals

used for different purposes dependent upon the relevant primary and second legislative requirements. The floorspace breakdown for the proposals are set out in Table 4.1.

**Table 4.1: Floorspace Breakdown**

USE	GROSS EXTERNAL AREA (GEA) SQ M	GROSS INTERNAL AREA (GIA) SQ M	NET INTERNAL AREA (NIA) SQ M
<b>Residential</b>	17036.3 <sup>1</sup>	15,566	11,602

1 – Figure is inclusive of plant and concierge.

### Built Form

- 4.7 The proposed development takes the form of a perimeter block, with two internal courtyards at lower ground floor level, divided by a central cross wing to create an “S shaped” block (see Figure 4.1).

**Figure 4.1: Arrangement Plan**



- 4.8 The “S shaped” block is formed by six interlocking “L shaped” residential blocks. Three circulation cores are accessed from St Pancras Way and three from Rochester Place.
- 4.9 The overall massing is a five storey parapet to St Pancras Way and Camden Road, with two additional set-back floors to these elevations. The parapet line to Rochester Place and 102 St Pancras Way is four storeys with setbacks floors.

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4.10 The scale, height and massing of the scheme arises from a detailed and comprehensive analysis of the surrounding urban environment, including views of the four surrounding Conservation Areas. This is described in more detail in the Design and Access Statement and Townscape and Visual Impact Assessment.

### Residential – Mix, Tenure and Size

#### Overall Mix

4.11 A total of 166 residential units are proposed at the site, comprising:

- 50 x 1 bed units (30.5%);
- 99 x 2 bed units (60.5%);
- 14 x 3 bed units (8%); and
- 3 x 4 bed units (1%).

4.12 A breakdown of the mix by tenure is provided below.

#### Mix by Tenure

4.13 The proposals provide 84 affordable units (51%) and 82 market units (49%). On a GEA floorspace basis the affordable comprises 50% of the floorspace.

4.14 46 of the units (55%) will be provided for affordable rent and 38 as intermediate (45%). On a NIA floorspace basis the tenure split is 60% affordable rent (3423sq m): 40% intermediate (2,320 sq m).

4.15 A breakdown of the mix by tenure is provided in Table 4.2.

**Table 4.2: Unit Schedule**

	MARKET	AFFORDABLE RENT	INTERMEDIATE	TOTAL
1 Bed	16	11	23	50
2 Bed	60	24	15	99
3 Bed	6	8	0	14
4 Bed	0	3	0	3
Total	82	46	38	166

#### Size

4.16 A detailed breakdown of each unit size is set out within the Accommodation Schedule which accompanies the Drawing Package.

4.17 An overview of typical residential unit layouts is also provided within the Drawing Package.

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### Access and Inclusivity

- 4.18 All residential units will meet Lifetime Homes Requirements and 10% of units will meet wheelchair housing requirements to be easily adapted to achieve them. The Access and Inclusivity Statement, which forms part of the package of application documents, provides details of the wheelchair adaptable units and other measures incorporated into the scheme design to ensure full compliance with access and inclusivity requirements.

### Amenity Space and Landscaping

- 4.19 The proposed development provides a total of approximately 2864 sq m private and communal amenity space across the site (see Table 4.3 for detailed breakdown).
- 4.20 Every unit is provided with private amenity space in the form of a balcony or terrace. This provided a cumulative total of 1,950 sq m private amenity space for the 166 units.
- 4.21 Approximately 914 sq m communal space is provided in the form of communal courtyards at the lower ground level and communal roof-top terraces. Approximately 110 sq m of the roof-top amenity space includes child’s play space.

**Table 4.3: Communal Amenity Space Provision**

Amenity Space	Total (sq m)
Private amenity space	1,950
Courtyard communal amenity space	488
Roof-top communal amenity space	426
<b>Total</b>	<b>2,864</b>

- 4.22 Full details of the landscaping proposals, together with measures to promote ecology and biodiversity across the site, are set out within the Landscaping Section of the Design and Access Statement and Landscaping Plans, along with the Phase 1 Habitat Survey Report that accompany the planning submission.

### Access, Transport and Servicing

#### Car and Cycle Parking

- 4.23 The development is proposed to be car-free, except for provision of two on-site disabled parking spaces.
- 4.24 A total of 296 cycle spaces will be provided, all of which are located at lower ground floor level and arranged around the core of each block so that the provision reflects the accommodation schedule for each block.
- 4.25 Access to the cycle stores is achieved via a lift, or within the market accommodation, a rail set alongside a low gradient flight of stairs. The registered providers’ preference is for a lift within the affordable blocks.
- 4.26 The Transport Assessment submitted in support of the proposals fully assesses the impact of the scheme and the conclusions of this are considered in more detail within Section 7 of this Statement.

## 4.0 The Proposals

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### Waste, Recycling and Servicing

#### Waste and Recycling

- 4.27 Each core will be provided with a dedicated bin store located at ground floor. Across the scheme approximately 33 x 1,100 L and 12 x 500 L Euro Bins will be provided, comprising a mix of provision for mixed dry recyclables, organic food waste and residual waste.

#### Bulky Waste

- 4.28 In addition, dedicated bulky waste stores are provided at lower and ground floor (see drawing refs: 4998-20\_101 and 102). A number of temporary bulky waste stores will be provided on the lower ground floor within the bicycle stores, for the store of bulky waste on an ad hoc basis.
- 4.29 Residents will liaise with the internal management team regarding the collection of any bulky waste arising, and the internal management team will be on hand to ease collection of bulky waste.

#### Servicing and Collection

- 4.30 Blocks A, B and C will be serviced from a refuse vehicle along the St Pancras Way frontage from on-street. Given the proximity of Block F's bin store to the signalised junction stop line on St Pancras Way, a management strategy will be introduced to transfer bins to dedicated holding area immediately south of Block B's bin store (see drawing ref: 4998-20\_102).
- 4.31 Blocks D and E will be serviced from Rochester Place as part of an existing refuse collection route.
- 4.32 Full details of waste and recycling are set out in the Waste and Recycling Strategy Report and Transport Assessment that accompany this planning submission.



## 5.0 Response to Pre-Application Advice and Consultation

### OVERVIEW OF PRE-APPLICATION ADVICE AND CONSULTATION

- 5.1 The applicant has undertaken extensive pre-application discussions with LB Camden Officers over the 11 months since January 2013 including Planning, Design and Conservation, Housing and Highways Officers. Formal pre-application advice has also been sought from the Greater London Authority (“GLA”) and Transport for London (“TfL”).
- 5.2 Over the same period the proposals have been subject to public consultation with Ward Councillors, surrounding residents and stakeholder groups (detailed below), providing multiple opportunities for the community to provide comments prior to the submission of the application.
- 5.3 A summary of the key activities undertaken and issues raised through pre-application and public consultation feedback are set out below (and within the Statement of Community Involvement).

#### Pre-Application Advice

- 5.4 The applicant has undertaken a series of pre-application meetings with LB Camden Officers since January 2013, in addition to the formal DC Forum and Developers Briefing which are referred to within the public consultation summary.
- 5.5 The following meetings have taken place with Council Officers:
  - Initial High Level Meeting – 7<sup>th</sup> December 2012;
  - Formal Pre-Application Meeting – 26<sup>th</sup> March 2013;
  - Design Workshop 1 – 22<sup>nd</sup> April 2013;
  - Design Workshop 2 – 14<sup>th</sup> May 2013;
  - Design Workshop 3 – 1<sup>st</sup> July 2013;
  - Design Workshop 4 – 2<sup>nd</sup> August 2013;
  - Highways Workshop – 10<sup>th</sup> September 2013;
  - Design Workshop 5 – 18<sup>th</sup> September 2013;
  - Secure by Design Meeting – 27<sup>th</sup> September 2013;
  - Design Workshop 6 – 4<sup>th</sup> October 2013; and
  - Housing Workshop (with Planning and Housing Officers) – 30<sup>th</sup> October 2013.
- 5.6 A separate meeting was also held with the GLA and TfL on 10<sup>th</sup> September 2013. Discussions have also taken place with TfL and LB Camden Aboricultural Officers.
- 5.7 In response to the issues arising out from the meetings with LB Camden and the GLA (as well as community consultation exercises), the applicants prepared a number of detailed studies to inform the pre-application discussions. These included:
  - Heritage Appraisal, assessing the heritage significance of the existing buildings on the site against Camden’s adopted Selection Criteria for Local Listing – April 2013 ;
  - Draft Employment Statement, in response to discussions regarding the proposed loss of employment floorspace at the site – September 2013; and

## 5.0 Response to Pre-Application Advice and Consultation

- Analysis of GP and Dental Practice Provision providing an overview of current GP and Dental Surgery capacity within a 1 mile radius of the site – September 2013.
- 5.8 The principal issues raised through the series of pre-application meetings are detailed in Table 5.1, alongside the summary of public consultation feedback. A summary is made of the applicant’s response and cross-reference is made to the relevant section of the Planning Statement and documents accompanying this planning submission where the issue is considered in further detail.

### EIA Screening Opinion

- 5.9 A request for an Environmental Impact Assessment (EIA) Screening Opinion was submitted to LB Camden in July 2013. The Council responded on 5<sup>th</sup> September 2013 (LPA Ref: 2013/4905/P) that:

*“the development is not considered to be likely to have significant effects on the environment by virtue of factors such as its nature, size or location”.*

### PUBLIC CONSULTATION

- 5.10 The Statement of Community Involvement that accompanies the planning application provides a detailed record of the consultation activities and comments received during the consultation period. A summary of the consultation events is set out below, and the issues raised and subsequent responses are summarised in Table 5.1.

### Public Exhibitions

- 5.11 Two sets of public exhibitions have been held on the proposals through the scheme evolution:
- Preliminary public exhibition at the London Irish Centre, 50 – 52 Camden Square, approximately 480 metres from the site on:
    - Thursday 11<sup>th</sup> July – 4 – 8 pm; and
    - Saturday 13<sup>th</sup> July – 11 – 3 pm;
  - Second public exhibition at the same venue on:
    - Monday 7<sup>th</sup> October – 4 – 8 pm; and
    - Tuesday 8<sup>th</sup> October – 4 – 8 pm.
- 5.12 35 people attended the first publication exhibition and 30 people attended the second.
- 5.13 Members of the applicant’s project team attended all the public exhibitions to answer any detailed questions. Feedback forms were made available to attendees. Full details are provided within the Statement of Community Involvement which accompanies the planning submission, however a summary of the main issues and design team responses are set out in Table 5.1.

### Development Control Forum

- 5.14 The scheme proposals were presented to the Development Management Forum on 11<sup>th</sup> June 2013.
- 5.15 The key issues arising out of this included:



## 5.0 Response to Pre-Application Advice and Consultation

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- Land Use:
  - Appropriateness of residential at the site;
  - Impact of additional residents on surrounding facilities and services;
  - Loss of employment floorspace;
  - Clarification of affordable housing provision and mix;
- Design and Amenity:
  - Noise Reflection;
  - Noise with courtyards as a results of “tunneling”;
  - Concerns at height (two storeys above surrounds);
  - Impact on sunlight and daylight for surrounding occupiers;
  - Amenity of units at basement level;
- Transport and Waste:
  - Construction Impact;
  - Impact on surrounding parking.

### Developer’s Briefing

5.16 The scheme proposals were presented to Ward Councillors and Members of the Development Control Committee at a briefing on 17<sup>th</sup> June 2013. The key issues and feedback arising out of this comprised:

- Land Use:
  - Loss of Employment Floorspace – should be robustly justified, including evidence to demonstrate why some replacement is not practical or viable;
  - Provision of larger family units, including scope to introduce 4-Bed units, could assist in balancing loss of employment floorspace;
  - Site not considered suitable for retail units or community meeting space;
  - Investigate local need in regard to GP surgeries.
- Scale and height:
  - Appears appropriate along St Pancras Way and Camden Road;
  - 7 storeys along Rochester Place is considered oppressive.
- Amenity:
  - Concern regarding overshadowing and amenity value of courtyards;
  - Overlooking between habitable room windows facing courtyard;
  - Littering of lightwells;
  - Appropriateness of balconies along Camden Road (due to vehicle noise and air quality)

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- Transport:
  - Servicing from Mews not supported;
  - Servicing of bulky goods to be considered;
  - Cycle movement to and from the site to be considered;
- Open Space:
  - On-site public open space not essential given existing spaces in the area;
  - Financial contributions to be directed towards Cantelowes Gardens;
  - Courtyards should not be gated.

### Local Amenity Groups

- 5.17 In addition, to the public exhibitions and DC Forum organised by LB Camden, the applicant has also held a series of breakout public and one-to-one meetings with a stakeholders from a range of community organisations, including:
- Reeds and Rochester Place Neighbourhood Association;
  - North Camden Town Neighbourhood Forum;
  - Camden Square Area Tenants and Residents Association;
  - South Kentish Town Conservation Area Advisory Committee;
  - Jeffreys Street Conservation Area Advisory Committee;
  - Camden Square Conservation Area Advisory Committee; and
  - Regent’s Canal Conservation Area Advisory Committee.
- 5.18 A series of meetings have been held through 2013, these comprised:
- Meeting with key stakeholders from Reeds and Rochester Place Neighbourhood Association, North Camden Town Neighbourhood Forum and surrounding CAACs to present initial proposals at Sheppard Robson’s offices - 8<sup>th</sup> July 2013;
  - Meeting with Camden Square Area Tenants and Residents Association, 1 Camden Park Road – 25<sup>th</sup> July 2013;
  - Update meeting with Reeds and Rochester Place Neighbourhood Association and North Camden Town Neighbourhood Forum – 3<sup>rd</sup> October 2013; and
  - Meeting with representative from South Kentish Town Conservation Area Advisory Committee – 3<sup>rd</sup> October 2013.

## 5.0 Response to Pre-Application Advice and Consultation

### KEY ISSUES RAISED DURING PRE-APPLICATION AND CONSULTATION EVENTS

Table 5.1 – Key Issues and Design Responses

Issue	How Addressed	Reference within Planning Statement (and other planning application documents)
Loss of Employment Floorspace	<p>A Building and Feasibility Cost Survey have been undertaken to assess the essential works required just to bring the building back into active use and further works required to bring the accommodation to a standard deemed suitable to meet occupier requirements as offices.</p> <p>A Viability Report has been prepared by local market agents, Currell Commercial, to assess availability and demand for employment space (across Class B Uses) in the Borough and around the site.</p> <p>Together these demonstrate that, based on the estimated costs, substantial investment would be required. This is not considered financially viable given the likely market rent and very limited occupier demand that exists in the area.</p>	<p>Employment Statement (and its appendices).</p> <p>Planning Statement – Section 7</p>
Incorporation of Commercial (Retail) Uses	<p>The site falls outside any designated Town or Neighbourhood Centre, however, it is considered to be well served by the surrounding Town and Neighbourhood Centres.</p> <p>Nos. 57 – 75b Camden Road (and 84 – 128b) form part of the designated Neighbourhood Centre which comprises a parade of shops serving local convenience needs and is located less than 100 metres from the site.</p> <p>Both Camden and Kentish Town Town Centres are in proximity to the site (approximately 650 metres).</p> <p>In informing the design process the</p>	<p>Planning Statement – Section 7</p>

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	<p>applicant carried out investigations with potential retail operators to identify interest. Due to the lack of interest and given existing retail operations within the surrounding area, the provision of new retail floorspace within the proposals was not considered appropriate.</p>	
<p>Family Affordable Housing Provision</p>	<p>The unit mix for the affordable provision has been arrived at in discussions with LB Camden Housing and the proposed Registered Provider (NewLon).</p> <p>In response to comments from Members, three 4-Bed units have been added to the scheme during its evolution. In addition, the proportion of 3 bed units has increased.</p>	<p>Affordable Housing Statement.</p> <p>Planning Statement – Section 5 for details of residential mix and Section 7 for assessment against policy.</p>
<p>GP Surgery Provision</p>	<p>An initial review was undertaken of capacity at GP and dental surgeries within 1 mile of the site. This has subsequently been updated to review practices within 800 metres from the site in accordance with Buildings for Life Regulations.</p> <p>Three GP surgeries are located within 800 metre walking distance of the site, with a further two just over 1 km away. All five surgeries are still accepting patients.</p> <p>The average patient to GP ratio is 1: 924 patients for the three surgeries. This falls substantially below the average for the Camden Clinical Commissioning Group and ODPM standards.</p> <p>Accordingly, it is considered that the estimated 300 new residents at the site could be provided for within the existing capacity surrounding the site. A financial contribution, rather than direct on-site provision, is therefore proposed.</p> <p>The applicant also reviewed dental practice provision. Six practices are within 800 metres of the site and all are accepting new patients. It is therefore also considered that there is capacity to</p>	<p>Planning Statement – Section 7</p> <p>Pre-Application Discussion Note on Analysis of GP and Dental Practice Provision (September 2013).</p> <p>Updated note (November 2013) – provided at Appendix 2 of this Statement.</p>

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	accommodate the new residents within the existing surrounding provision.	
Proposed Demolition (Response to Heritage Concerns)	<p>The building does not fall within a Conservation Area and is not statutory or locally listed. It was understood that the building was initially nominated for local listing. However, it was not included on the draft local list (October 2013).</p> <p>A Heritage Expert was instructed to undertake an assessment of the significance of the building and its contribution to views from the surrounding Conservation Areas. This assesses the existing buildings against English Heritage criteria and sets out the value as “undoubtedly very limited”.</p> <p>The public benefits of redeveloping the site are therefore considered to outweigh any case for retention.</p>	<p>Heritage Statement</p> <p>Townscape and Visual Impact Assessment.</p> <p>Planning Statement – Section 7.</p>
Design Concept	<p>The applicant team have tested a number of responses through the course of the design evolution.</p> <p>The overall design concept was completely revisited in April 2013 and the applicant appointed a new architect. This resulted in a new concept that sought to optimise the site dimensions through pulling the building line out along St Pancras Way and for courtyards to be introduced in the centre of the site.</p> <p>The potential for conventional (18 metre blocks) versus narrow blocks (13 m deep) were discussed with LB Camden Officers to allow for dual aspect units.</p> <p>Duplex units were introduced to optimise use of the lower ground floor.</p>	Design and Access Statement.
Height, Scale and Massing (In particular proposed height along Rochester Place)	<p>Following the revised design concept, different height, scale and massing continued to be tested with Officers and through public consultation.</p> <p>The applicant tested varying the heights of the building to create a varied roofscape, versus a mansion block</p>	<p>Design and Access Statement.</p> <p>Townscape and Visual Impact Assessment</p> <p>Planning Statement – Section 7</p>

## 5.0 Response to Pre-Application Advice and Consultation

	<p>approach with a unified height up to a parapet line, with setback rooftop accommodation.</p> <p>The mansion block approach evolved in response to comments. In particular, massing was relocated from Rochester Place to St Pancras Way and was set back from the parapet.</p> <p>The height along Rochester Place and opposite 102 St Pancras Way has been reduced and now stands at four storeys, with a set-back fifth floor.</p>	
Elevation Treatment	<p>The design team responded to comments to break down the building, and broke the composition into a base, middle and top.</p> <p>In response to comments that the parapet was considered too strong and dominating, the roof has been broken down into a number of different elements.</p> <p>The facade of the building’s middle has been broken down by a rhythm of bays.</p> <p>Through the design evolution, the size of windows have been reduced to allow the building a more domestic character.</p>	<p>Design and Access Statement.</p> <p>Townscape and Visual Impact Assessment</p>
Elevation Treatment – Ground Floor	<p>The design further evolved the ground floor elevation treatment to the duplex units in response to further comments from the LB Camden Design Officer that it should have a more domestic feel.</p> <p>Large windows are required to achieve adequate sunlight and daylight levels, nevertheless fenestration has been used to provide a more residential feel. This results in a reduction in the full height glazing in favour of an increased size of openable vents.</p> <p>Timber panelling has been introduced for the door and side panels, and a cantilevered canopy introduced to ‘domesticise’ the street entrances.</p>	<p>Design and Access Statement</p> <p>Townscape and Visual Impact Assessment</p>

## 5.0 Response to Pre-Application Advice and Consultation

<p>Internal Sunlight and Daylight</p>	<p>To improve sunlight and daylight results, the following design solutions have been introduced:</p> <p>Floor to ceiling heights at ground floor have been increased;</p> <p>Overhangs above windows were reduced or removed;</p> <p>Light coloured materials have been introduced for courtyard elevations; and</p> <p>Different room layouts tested.</p> <p>In particular, the ground and lower ground layout opposite 102 St Pancras was planned. Residential accommodation in this location was placed with entrances, cycle storage and bin stores.</p>	<p>Internal Sunlight and Daylight Report.</p> <p>Design and Access Statement.</p> <p>Planning Statement – Section 7.</p>
<p>Quality of Amenity Value of Communal Courtyard Spaces</p>	<p>Communal roof terraces were introduced to provide alternative amenity space that benefits from excellent sunlight levels. The two rooftop terraces also provide for child play and recreation.</p> <p>By comparison, the lower ground courtyards are intended to provide visual amenity and a tranquil oasis to provide a “sense of community” for residents.</p> <p>Light colours have been introduced on courtyard elevations to optimise light to ensure the courtyards provide a high quality environment.</p>	<p>Design and Access Statement (in particular, Landscape Section)</p> <p>Internal Sunlight and Daylight Assessment.</p>
<p>Balcony Treatment and amenity of Private Balconies</p>	<p>Recessed balconies were introduced along Camden Road and St Pancras Way to provide shelter from the busy roads.</p> <p>Along the quieter Rochester Place, the balconies are partly recessed and partly projecting.</p> <p>Following further comments from the LB Camden Design Officer, a solid parapet has been introduced (lining up with the adjacent window bays) and a metal</p>	<p>Design and Access Statement.</p> <p>Planning Statement – Section 7.</p>

## 5.0 Response to Pre-Application Advice and Consultation

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	<p>balustrade is introduced to act as a screen between views from the street and apartments above.</p> <p>Along Rochester Place, perforated metal balustrade has been introduced to address concerns about the level of privacy in regard to the gardens of the flats on the opposite side of Rochester Place. The proposed solution balances privacy with providing visual interest.</p>	
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5.19 The applicant’s response to the above and issues raised during consultation are referred to in full within Section 7.0 (Policy Assessment).



## 6.0 Legislative and Policy Overview

### PLANNING POLICY FRAMEWORK

- 6.1 The Town and Country Planning Act 1990 (the “1990 Act”) and the Planning and Compulsory Purchase Act 2004 (the “2004 Act”) establish the legislative basis for town planning in England and Wales. Together these acts establish a “plan led” system which requires planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise (section 38(6) of the 2004 Act).
- 6.2 In assessing and determining development proposals, the National Planning Policy Framework (March 2012) sets out that local planning authorities should apply the presumption in favour sustainable development where development proposals that accord with up-to-date development plan should be approved without delay (Para 14).
- 6.3 The statutory development plan for the application site comprises:
  - The London Plan (July 2011), including Revised Early Minor Alteration to the London Plan (October 2013);
  - The LB Camden Core Strategy (November 2010); and
  - The LB Camden Development Policies Document (November 2010).
- 6.4 The Mayor and LB Camden have also published supplementary planning guidance on specific planning issues, which form material considerations.
- 6.5 This following section identifies the principal policies and material considerations applicable to the determination of these proposals.

### CENTRAL GOVERNMENT GUIDANCE

#### National Planning Policy Framework (NPPF)

##### Presumption in Favour of Sustainable Development

- 6.6 National planning guidance is contained within the National Planning Policy Framework (“NPPF”) (March 2012). It introduced a presumption in favour of sustainable development where development proposals that accord with up-to-date development plan should be approved without delay (Para 14).
- 6.7 It sets out the core planning principles that underpin the planning system (Para 17), which include:
  - Proactively driving and supporting sustainable economic development to deliver homes. Every effort should be made to objectively identify and then meet the housing needs of an area and positively respond to wider opportunities for growth;
  - Encouraging the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental quality; and
  - Seeking high quality design and a good standard of amenity for all existing and future occupants of lands and buildings.

##### Employment

- 6.8 The National Planning Policies Framework (“NPPF”) seeks to balance the Government’s commitment to securing economic growth in order to create jobs and prosperity (Paragraph

## 6.0 Legislative and Policy Overview

18) with the need to “boost significantly the supply of housing” (Paragraph 47). Paragraphs 22 and 51 set policies to assist in achieving this balance.

6.9 Paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

6.10 Paragraph 51 directs Local Planning Authorities (“LPAs”) to identify and bring back into residential use empty housing and buildings, in line with local housing and empty homes strategies. LPAs are directed to:

*“Normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use class) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate”*

### High Quality Homes

6.11 Local planning authorities (LPA) should seek to contribution to the overall supply of housing through use of their evidence base to ensure that their Local Plan meets the need for market and affordable housing in the housing market area.

6.12 Para 50 of the NPPF states that LPAs should seek to deliver a wide choice of high quality homes, creating opportunities for home ownership and facilitating inclusive and mixed communities. This should be achieved through careful planning for a mix of housing based on current and future demographic trends and identifying the size, type, tenure and range of housing that is required for particular locations reflecting local demands.

### Requiring Good Design

6.13 Well-designed buildings and places can improve the lives of people and communities (Para 8). Section 7 requires good design in all development. Para 58 sets out criteria which LPAs should ensure development aims for, including:

- Function well and add to the overall quality of the area over the lifetime of the development;
- Optimise the potential of sites;
- Respond to local character and history and reflect the identify of local surroundings and material, while not preventing or discouraging appropriate innovation;
- Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- Are visually attractive as a result of good architecture and appropriate landscaping.

6.14 LPAs should expect the use of relevant design codes where this can assist in the delivery of high quality homes however policies should avoid unnecessary prescription or detail and concentrate on providing guidance to encourage creativity and innovation (Para 59). Para 60 states that Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative

## 6.0 Legislative and Policy Overview

through unsubstantiated requirements to confirm to certain development forms or styles. It is however, proper to seek to promote or reinforce local distinctiveness.

- 6.15 Paragraph 61 states that ‘Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment’.
- 6.16 Applicants will be expected to work closely with those directly affected by their proposal to evolve designs that take account of the views of the community. Proposals that can demonstrate this in development the design of the new development should be looked on more favourably (Para 66).

### Conserving and enhancing the Historic Environment

- 6.17 Section 12 sets out policy guidance in respect to conveying and enhancing the historic environment.
- 6.18 Heritage Assets are defined in Annex 2 of the NPPF 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. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)’
- 6.19 The setting of a heritage asset is also defined in Annex 2 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.’
- 6.20 In determining applications, LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (Para 128).
- 6.21 Para 131 sets out that in determining applications, LPAs should take into account:
  - The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - The positive contribution that conservation of heritage assets can make to sustainable communities, including their economic viability;
  - The desirability of new development making a positive contribution to local character and distinctiveness.
- 6.22 In weighing applications that affect directly or indirectly 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.

### STATUTORY DEVELOPMENT PLAN

#### London Plan (Incorporating Revised Early Minor Alterations), October 2013

- 6.23 On 11 October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA) which are now operative as formal alterations and form part of the development plan for Greater London. The principal alterations are brought about to ensure conformity with the National Planning Policy Framework (NPPF).

## 6.0 Legislative and Policy Overview

6.24 The London Plan sets out the Mayor’s vision until 2031 to:

*“excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21<sup>st</sup> century, particularly that of climate change”.*

6.25 This vision is supported by six detailed objectives, which include ensuring London is:

- A city that meets the challenges of economic and population growth;
- An internationally competitive and successful city with a strong and diverse economy and entrepreneurial spirit;
- A city of diverse, strong, secure and accessible neighbourhoods; and
- A city that delights the senses.

### London’s Places

6.26 The London Plan’s focus for Inner London is to realise its potential in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, whilst improving the quality of life and health for those living, working, studying or visiting there (Policy 2.9).

6.27 London’s town centres should be the main focus for commercial development and intensification, beyond the Central Activities Zone (Policy 2.15). This policy outlines that development proposals within town centres should confirm with Policies 4.7 and 4.8 and:

- a. Sustain and enhance the vitality and viability of the centre;
- b. Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations;
- c. Support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services;
- d. Be in scale with the centre;
- e. Promote access by public transport, walking and cycling;
- f. Promote safety, security and lifetime neighbourhoods;
- g. Contribute towards an enhance environment, urban greening, public realm and links to green infrastructure; and
- h. Reduce delivery, servicing and road user conflict.

### London’s People

#### Increasing Housing Supply

6.28 The housing provision target will be reviewed in 2015/2016 and periodically thereafter. Boroughs should seek to achieve and exceed the relevant minimum annual average housing target. Table 3.1 sets out that the 10 year target for the London Borough of Camden is 6,650 with an annual target of 665. Boroughs should identify opportunities to bring forward development that will assist in meeting these targets in particular the potential of brownfield sites and intensification (Policy 3.3).

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### Optimising Housing Potential

- 6.29 Development proposals should optimise housing output for a particular locations with respect to the density range contained in Table 3.2, the appropriate density for the application site which is classed as central<sup>1</sup> is 650-1100 hr/ha (Policy 3.4). The proposed housing provision should be determined on the housing requirements of the area as opposed to the built form of the development. Higher density provision for smaller households should be focused on areas with good public transport accessibility (PTAL) (Para 3.29).

### Quality and Design of Housing Developments

- 6.30 Housing developments should seek to achieve a high quality both internally and externally whilst taking account of the wider environment and immediate context. New residential developments should be respectful of the physical context, local character, density, tenure and land use mix. Minimum space standards based on gross internal floor area (GIA) should be applied in accordance with Table 3.3 and have adequately sized rooms and efficient layouts that meet the needs of residents over their lifetimes (Policy 3.5).
- 6.31 New housing developments should ensure that all children and young people have safe access to good quality and well-designed play and informal recreation provision. Development proposals should provide play and informal recreation preferably on site, based on the expected child population specific for that scheme (Policy 3.6).

### Housing Choice

- 6.32 A variety of affordable and suitably sized homes should be available for the people of London which meet their requirements whilst still maintaining a high quality of design. All new housing should be built to Lifetime Homes standards and 10% should be wheelchair accessible or easily adaptable for residents and the needs for accommodation of larger family should be provided based on community needs (Policy 3.8). Housing developments should promote mixed and balanced communities in terms of tenure and household income (Policy 3.9).

### Affordable Housing

- 6.33 Affordable housing should be provided in developments of a particular size, which incorporates social rented, affordable rented and intermediate housing (Policy 3.10). Boroughs should seek to maximise affordable housing by providing 60% social and affordable rent and 40% for intermediate rent or sale and should set overall targets having regard to guidance provided by the Mayor through the London Housing Strategy, supplementary guidance and the London Plan Annual Monitoring Report (Policy 3.11).
- 6.34 Negotiations for the reasonable level of affordable housing should prioritise the provision of affordable family housing. However, account should be afforded to individual circumstances including development viability and resources available from registered providers (including public subsidy) (Policy 3.12) Site with the capacity to provide 10 or more homes should normally provide affordable housing on site (Policy 3.13).

### **London's Economy**

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<sup>1</sup> Central – areas with dense development, a mix of uses, large building footprints and generally buildings of four-six storeys located within 800 metres walking distance of an International, Metropolitan or Major town centre.

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- 6.35 London Plan Policy 4.2 (Offices) supports the redevelopment of office provision to improve London’s competitiveness and address the wider objectives of the London Plan. However, it also recognises the need to consolidate and extend the strengths of office markets, focusing new development on viable locations with good public transport and supporting managed conversion of surplus capacity to more viable, complementary uses (4.2 [A(b)]). It encourages LPAs to do the same in their Local Plans (Policy 4.2[B(d)]).
- 6.36 Policy 4.4 seeks to manage industrial land and premises. LPAs are required to demonstrate how their stock of industrial land will be planned and managed in local circumstances in line with strategic policy. The policy recognises (4.4[B(i)]):

*“The potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure”.*

### London’s Response to Climate Change

- 6.37 The Mayor’s energy hierarchy is to:
  - be lean - use less energy;
  - be clean - supply energy efficiently; and
  - be green - use renewable energy.
- 6.38 The Mayor has set targets for carbon dioxide emissions reductions. Between 2013 – 2016, 40 per cent improvement on 2010 Building Regulations will be sought for non-domestic buildings (Policy 5.2). Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions are to be met within the framework of the energy hierarchy. Where targets cannot be met on site any short-fall can be provided offsite or through payment in lieu. Measures for which are set out in the Mayor’s draft Sustainable Design and Construction SPG (August 2013).
- 6.39 Sustainable design and construction standards include minimising carbon dioxide emissions, avoiding pollution, minimising waste and maximising recycling and avoiding impacts from natural hazards (Policy 5.3).
- 6.40 Regard should be had to sustainable retrofitting of existing buildings. Opportunities for reducing carbon dioxide emissions from the existing building stock should be taken by identifying potential synergies between new developments and existing buildings through the retrofit of energy efficiency measures, decentralised energy and renewable energy opportunities (Policy 5.4).
- 6.41 The Mayor’s objective is that 25% of energy supply should be decentralised by 2025 (Policy 5.5). Developers should be required to prioritise connection to existing or planned decentralised energy networks where feasible.
- 6.42 Policy 5.6 sets out the approach to decentralised energy in development proposals, prioritising connection to existing systems, followed by site wide CHP and communal heating and cooling.
- 6.43 Policy 5.7 seeks that a proportion of energy is generated from renewable sources. Major developments should reduce potential overheating (Policy 5.9).
- 6.44 Policy 5.10 promotes urban greening with green infrastructure being integrated from the beginning of the design process to contribute to urban greening, including tree planting,

## 6.0 Legislative and Policy Overview

green roofs and walls and soft landscaping. Developments should include green roofs and walls where feasible (Policy 5.11).

- 6.45 Developments should utilise sustainable urban drainage (Policy 5.13), unless there are practical reasons for not doing so. Development should minimise the use of mains water by incorporating water saving measures and equipment (Policy 5.15).

### London's Transport

- 6.46 The Mayor will encourage closer integration of planning and development and will encourage development that reduces the need to travel and encouraging walking by improving the urban realm (Policy 6.1).
- 6.47 Development proposals should ensure that impacts on transport capacity are assessed (Policy 6.3).
- 6.48 Developments should provide secure cycle facilities (Policy 6.9). Maximum parking standards are set out in Table 6.3.
- 6.49 Maximum car parking standards are set out in Table 6.2 and for residential where developments benefit from good public transport accessibility significantly less than 1 space per unit should be sought. In addition, developments must ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.

### London's Living Places and Spaces

- 6.50 Developments should be designed so that the layout, tenure and mix of uses interface with the surrounding land and improve people's access to social and community infrastructure, including green spaces, local shops and public transport (Policy 7.1). The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 6.51 Development should be of the highest standards of accessible and inclusive design (Policy 7.2) and consistent with the principles of "secured by design" (Policy 7.3).
- 6.52 Architecture should contribute to a coherent public realm, streetscape and wider cityscape (Policy 7.6). Buildings should:
- Be of the highest architectural quality;
  - Be of a proportion, composition, scale and orientation that enhances, activates and appropriately redefines the public realm;
  - Comprise details and materials that complement, not necessarily replicate the local architectural character;
  - Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate;
  - Incorporate best practice in resource management and climate change adaptation and mitigation;
  - Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
  - Be adaptable to different activities uses, particularly at ground floor;

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- Meet the principles of inclusive design; and
  - Optimise the potential of sites.
- 6.53 New development in the setting of heritage assets, and conservation areas should be sympathetic to their form, scale, materials and architectural detail. It should make provision for the protection of archaeological resources (Policy 7.8).
- 6.54 Developments should promote sustainable design and construction methods to reduce emissions (Policy 7.14) and should aim to be “air quality neutral” and not lead to further deterioration of existing poor air quality. Offsetting should be used to ameliorate negative impacts associated with development proposals.
- 6.55 Existing and potential adverse noise impacts should be minimised in development proposals, separating new noise sensitive development from major noise sources and promoting new technologies and improved practices to reduce noise at source (Policy 7.15).
- 6.56 A proactive approach should be taken to the protection, promotion and management of biodiversity in support of the Mayor’s Biodiversity Strategy (Policy 7.19).

### LB Camden Local Development Framework

#### Site Designations

- 6.57 The site is not subject to any site specific allocations, however it falls subject to the following designation:
- Designated View: Parliament Hill summit to St. Pauls Cathedral.
- 6.58 Whilst the site is not located within any conservation area it is in close proximity to four surrounding conservation areas:
- Jeffrey’s Street;
  - Rochester;
  - Camden Broadway; and
  - Camden Square.

#### Relevant Policies

- 6.59 The relevant policies from LB Camden Core Strategy (November 2010) comprise:
- Policy CS1 Distribution of Growth;
  - Policy CS3 Other Highly Accessible Areas;
  - Policy CS6 Providing Quality Homes;
  - Policy CS8 Promoting a successful and inclusive Camden economy;
  - Policy CS11 Promoting sustainable and efficient travel;
  - Policy CS13 Tackling climate change through promoting high environmental standards;
  - Policy CS14 Promoting high quality places and conserving our heritage; and
  - Policy CS15 Protecting and improving our parks and open spaces and encouraging biodiversity.



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6.60 The relevant policies from LB Camden Development Policies Document (November 2010) comprise:

- Policy DP2 Making Full Use of Camden’s Capacity for Housing;
- Policy DP3 Contributions to the supply of affordable housing;
- Policy DP5 Homes of Different Sizes;
- Policy DP6 Lifetime Homes and Wheelchair Housing;
- Policy DP13 Employment Sites and Premises;
- Policy DP16 The transport implications of development;
- Policy DP18 Parking Standards and limiting the availability of car parking;
- Policy DP19 Managing the Impact of Parking;
- Policy DP20 Movement of Goods and Materials;
- Policy DP21 Development Connecting to Highway Network;
- Policy DP22 Promoting sustainable design and construction;
- Policy DP23 Water;
- Policy DP24 Securing High Quality Design;
- Policy DP25 Conserving Camden’s Heritage;
- Policy DP26 Managing the impact of development on occupiers and neighbours;
- Policy DP27 Basement and Lightwells;
- Policy DP28 Noise and Vibration;
- Policy DP29 Improving Access;
- Policy DP31 Provision of, and improvements to, open space and outdoor sport and recreation facilities; and
- Policy DP32 Air Quality and Camden’s Clean Zone.

6.61 Those relevant policies are set out by topic below. Where appropriate, reference is also made to relevant supplementary guidance provided in Camden’s CPGs 1- 8.

### Growth Distribution

6.62 The most efficient use of land should be promoted: Camden will focus growth in the most suitable locations, including appropriate development in accessible locations in particular Central London and town centres such as Camden Town and other areas of more limited change (Policy CS1). The Council will expect 12,250 additional homes to be provided in Camden between 2010/11 and 2024/25.

6.63 The Council seek to promote the most efficient use of Camden’s limited land supply and so will seek development that makes full use of its site taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site (Policy CS1). The Council will resist development that is inefficient within site boundaries. Developments with a higher density should be located in places that are well served by public transport (Policy CS1).

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- 6.64 In order to achieve efficient developments the Council will encourage higher densities in the most accessible parts (i.e. Central London and town centres) of the borough and other appropriate areas whilst having regard to the density matrix of the London Plan. Such developments should be of excellent design quality and sensitively consider the amenity of surrounding occupiers (para 1.22).
- 6.65 Whilst the Council expect more limited development and change to occur in the areas outside the growth areas and other highly accessible locations the scale will vary. It is anticipated that schemes that are adjacent or nearby to either of these areas will experience greater redevelopment than areas that are within predominantly residential lower density areas. (Policy CS1)

### Employment

- 6.66 Core Strategy Policy CS8 seeks to promote a successful and inclusive Camden economy. The Council will support the Borough’s industry by safeguarding existing employment sites and premises that meet the needs of modern industry and other employers.
- 6.67 Paragraph 8.8 of the CS explains that, subject to the policy provisions of Policy CS8, the “future supply of offices in the borough can meet project demand”. Consequently:
 

*“The Council will consider proposals for other uses of older office premises if they involve the provision of permanent housing (in particular, affordable housing) and community uses”.*
- 6.68 In addition, CPG5 states that:
 

*“Camden’s Core Strategy sets out the project demand and planned supply of office floorspace in the borough. We expect the supply of offices to meet the project demand over the plan period and as a result we may allow a change from B1 (a) offices to another use in some circumstances, such as older office premises or buildings that were originally built as residential dwellings. Our priority is for the replacement use to be permanent housing or community use.”*
- 6.69 Camden’s policies are quite explicit where the change of use or loss of office floorspace is deemed appropriate and policy sets out a number of criteria against which the proposals will be assessed. Further information on assessing sites is set out in the Camden Business Premises Study (2011), which is described in further detail in the material considerations section.
- 6.70 Policy DP13 establishes that the Council will seek to retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:
  - It can be demonstrated to the Council’s satisfaction that a site or building is no longer suitable for its existing business use; and
  - There is evidence that the possibility of retaining, reusing or developing this site or building for similar or alternative business use has been fully explored over an appropriate period of time (for at least two years paragraph 13.5).
- 6.71 Where a change of use has been justified to the Council’s satisfaction, they will seek to maintain some business use on site, with a higher priority for retaining flexible space that is suitable for a variety of business use (Policy DP13).
- 6.72 However, as per the Core Strategy, when it can be demonstrated that the site is not suitable for any use other than B1(a) offices, the Council may allow a change of use permanent residential uses (Policy DP13).

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- 6.73 The supporting text to Policy DP13 (paragraph 13.3) provides a list of factors that the Council will take into account when considering if there is the potential for business uses to continue at a site. The list is as follows:
- Is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;
  - Is in a location suitable for a mix of uses including light industry and local distribution warehousing;
  - Is easily accessible for the Transport for London Road Network and/or London Distributor Roads;
  - Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;
  - Has adequate onsite vehicle space for servicing;
  - Is well related to nearby land uses;
  - Is in a reasonable condition to allow the use to continue;
  - Is near to other industry and warehousing, noise/ vibration generating uses, pollution and hazards;
  - Provides a range of unit sizes, particularly those suitable for small businesses (under 100 sq m).
- 6.74 It should be noted that the thrust of the above policies is to protect the loss of industrial rather than office uses. This is reflected in the criteria within Policy DP13 (and Paragraph 13.3) which focus on industrial uses. By comparison, CPG5 provides guidance which is more applicable to assessing offices.
- 6.75 Camden Planning Guidance 5 (“CPG5”) on Town Centres, Retail & Employment provides further guidance on the above policies CS8 and DP13. Paragraph 6.4 adds to the DP13 list of factors to be taken into account when assessing change to non-business uses:
- The age of the premises;
  - Whether the premises include features required by tenants seeking modern office accommodation;
  - The quality of the premises and whether it purpose built accommodation;
  - Whether there are existing tenants in the building, and whether these tenants intend to relocate;
  - The location of the premises and evidence of demand for office space in this location; and
  - Whether the premises currently provide accommodation for small and medium businesses.
- 6.76 Paragraph 6.5 of the CPG sets out that, when it would be difficult to make an assessment using the above, only then would the Council require evidence in the form of a marketing assessment.
- 6.77 The CPG acknowledges that Camden has a very restricted supply of sites and premises suitable for light industrial, storage and distribution uses. The Council identify three main categories of such premises based on the Business Premises Study (2011), the categories (Category 1 – 3) are described in more detail in the material considerations section below.

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- 6.78 Category 1 sites are rare in the Borough and will always be protected. Whilst Category 2 are more common in Camden, they will be protecting unless there is very strong marketing evidence to show they are no longer suitable. Category 3 sites, however, are considered heavily compromised and thus may not be suitable for continued industrial use.
- 6.79 Where new industrial premises come forward, the space should resemble Category 1 as closely as possible (Paragraph 6.15). Good delivery/ servicing access, separation from other uses, freedom to operate at all times and 50-70% site coverage are considered by the Council to be most important features.

### Residential

- 6.80 Housing is a priority land-use of the Camden LDF. Camden will seek to maximise the supply of additional housing to meet or exceed Camden’s target of 5,950 homes from 2007 – 2017, including 4,370 additional self-contained homes (Policy CS6).
- 6.81 In a bid to minimise social polarisation and encourage mixed communities the Council seek residential development that provides a range of homes suitable for a range of incomes, different sizes and for different ground, giving priority to developments that provide affordable housing (Policy CS6).
- 6.82 The Council will seek to maximise the supply of additional homes in the Borough by expecting the maximum appropriate contribution to supply of housing on sites that underused or vacant, taking into account any other uses that are needed at the site (Policy DP2). Para 2.9 of the Development Policies promotes higher densities in order to maximum the use of a site and whilst the development should take account of the London density matrix it should be towards the higher end and maintain regard for the character of the context.
- 6.83 There is a strong requirement for a variety of unit size in new developments (Policy CS6). The Council will seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priority Table and expect a mix of large and small homes in all residential developments (Policy DP3).

**Table 6.1: Camden’s Dwelling Size Priority Table**

Housing Type	Dwelling Type	Priority (% where available)
Market Housing	1 Bed (or studio)	Lower
	2 Beds	Very High (> 40%)
	3 Bed +	Medium
Social Rented	1 Bed (or studio)	Lower
	2 Beds	Medium
	3 Bed +	High / Very High (> 50%)
Intermediate	1 Bed (or studio)	Medium
	2 Beds	High
	3 Bed +	High (> 10%)

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- 6.84 CPG2 provides further guidance on the number of bedrooms expected as part of affordable housing development. For social rented, dwellings with three or more bedrooms are prioritised. In order to ensure genuinely affordable rented housing the Council will prioritise homes with two bedrooms (Paragraph 2.51).

### Affordable Housing

- 6.85 LB Camden have an affordable housing target of 50% of total addition to housing floorspace, with guidelines of 60% social rented and 40% intermediate housing (Policy CS6).
- 6.86 Residential development with capacity for 10 or more additional dwellings or 1,000 sq m residential floorspace gross should make a contribution to the supply of affordable housing. (Policy DP3).
- 6.87 The Council will expect the appropriate contribution to be made on-site. Where it cannot practically be achieved on site, the Council may accept off-site affordable housing.
- 6.88 The Council will negotiate the development of individual sites and related sites to seek the maximum reasonable amount of affordable housing on the basis of the 50% target, but will apply the target with regard to a sliding scale (Policy DP3).
- 6.89 CPG2 sets out that the Council now seeks 30% social rented housing (with three-bedrooms or more), 30% genuinely affordable rented housing (with one or two bedrooms) and 40% intermediate housing.
- 6.90 The Camden Housing Needs Survey Update 2008 identified the need to fill the gap between affordable housing and market housing which can be achieved through the provision of intermediate housing. The Council support the inclusion of a variety of different types of intermediate housing, including rent, shared ownership and opportunity to switch from one to the other (Para 6.32-6.33).

### Design

- 6.91 The Council will encourage buildings that are attractive, safe and of the highest standard of design. They should also preserve and enhance Camden’s heritage assets and respect the number of conservation areas. Development proposals must seek to protect important views of St Paul’s Cathedral and the Palace of Westminster (Policy CS14). Policy DP25 sets out the Council will not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area.
- 6.92 The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider (Policy DP24):
- Character, setting, context and the form and scale of neighbouring buildings;
  - The character and proportions of the existing building, where alterations and extensions are proposed;
  - The quality of materials to be used;
  - The provision of visually interesting frontages at street level;
  - The appropriate location for building services equipment;
  - Existing natural features, such as topography and trees;
  - The provision of appropriate hard and soft landscaping including boundary treatments;

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- The provision of appropriate amenity space; and
  - Accessibility.
- 6.93 Camden will seek to encourage outstanding architecture and design, both in contemporary and traditional styles. Innovative design can greatly enhance the built environment and, unless a scheme is within an area of homogenous architectural style that is important to retain, high quality contemporary design will be welcomed (DPD, Para 24.6).
- 6.94 In particular development should consider:
- The character and constraints of its site;
  - The prevailing pattern, density and scale of surrounding development;
  - The impact on existing rhythms, symmetries and uniformities in the townscape;
  - The compatibility of materials, their quality, texture, tone and colour;
  - The composition of elevations;
  - The suitability of the proposed design to its intended uses;
  - Its contribution to public realm, and its impact on views and vistas; and
  - The wider historic environment and buildings, spaces and features of local historic value (DPD, Para 24.7).
- 6.95 The Council will not permit any development that will cause harm to the amenity of neighbours or current occupiers on site (Policy DP26). The principle factors that they will consider in this assessment are;
- Visual privacy and overlooking;
  - Sunlight and daylight;
  - Noise and vibration levels;
  - Odour, fumes and dust;
  - The inclusion of appropriate attenuation measures.
- 6.96 Developments will also be required to provide facilities for storage (as well as bicycle storage), recycling and disposal of waste (Policy DP26).

### Sustainability

- 6.97 All development is expected to take measures to minimise the effects of, and adapt to, climate change and is encouraged to meet the highest feasible environment standards that are financially viable during construction and occupation (Policy CS13).
- 6.98 Land use should minimise the need to travel by car and help support local energy networks. The efficient use of land and buildings should be promoted and carbon emissions minimised from redevelopment, construction and occupation. Buildings should be designed to cope with, and minimise the effects of, climate change.
- 6.99 Policy CS13 sets out that developments of 10 units or more, or 1000 sq m or more, are expected to reduce their carbon dioxide emissions by 20% through the generation of renewable energy on-site unless it can be demonstrated that such provision is not feasible.
- 6.100 Schemes must demonstrate how they have incorporated sustainable design and construction measures and incorporate green or brown roofs and green walls wherever

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suitable (Policy DP22). Specifically, new build housing must meet the Code for Sustainable Homes Level 3 by 2010 and Level 4 by 2013.

- 6.101 Development will be required to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures, such as:
- Summer shading and planting;
  - Limiting run-off;
  - Reducing water consumption;
  - Reducing air pollution; and
  - Not locating vulnerable use in basements in flood-prone areas.
- 6.102 Developments will be expected to connect to decentralised energy networks and use the heat unless developers can demonstrate it is not technically feasible or financially viable.
- 6.103 The Council will require developments to reduce their water consumption, the pressure on the combined sewer network and flood risk (Policy DP23). Developments should incorporate water efficient features and equipment and capturing, retaining and re-using surface water and grey water on-site. Reducing the amount and rate of run-off and waste water entering the combined storm water and sewer network and other sustainable urban drainage methods should reduce the risk of flooding.

### Transport

- 6.104 LB Camden will minimise provision of private parking in new developments through car free development in the most accessible locations and car capped developments elsewhere. The availability of car clubs and car pooling will be encouraged and low emission vehicles will be encouraged through the provision of electric charging points (Policy CS11).
- 6.105 Development should be integrated with the transport network and be supported by adequate walking, cycling and public transport links (Policy DP16).
- 6.106 Policy DP18 sets out that on-site parking should comply with LB Camden's car parking standards; low parking provision areas should have a maximum of 0.5 spaces per dwelling and the rest of the Borough should have 1 space per dwelling. Development should also meet cycle parking requirements (1 cycle space per unit, 1 space per 10 units for visitors above threshold of 20 units) (Policy DP18). However, the London Plan (2011) supersedes Camden's DPD and its parking policies should take precedence (see above).
- 6.107 Developments in areas of on-street parking stress should be 'car-capped', where the Council will limit on-site spaces to those designated for disabled people; any operational or servicing needs; and spaces designated for the occupiers of development specified as car-capped. Street parking permits will not be issued and a legal agreement will be used to condition that there will be no issuing of parking permits (Policy DP18).
- 6.108 LB Camden will seek to ensure that the creation of additional car parking spaces will not have negative impacts of parking, highways or the environment and will encourage the removal of surplus car parking (Policy DP19).
- 6.109 Development that would generate significant movement of goods and materials during construction should minimise the movement of goods and material by road, and consider the use of more sustainable alternatives, such as rail and canal links (Policy DP20).

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6.110 Policy DP21 seeks that any development connecting to the highway network should ensure the use of the most appropriate roads by each form of transport. Direct vehicular access to the Transport for London Road Network (TLRN) and other major roads should be avoided.

### Access

- 6.111 Policy CS14 seeks the highest standards of access in all buildings and places and requires schemes to be designed to be inclusive and accessible.
- 6.112 All housing should meet lifetime homes standards: 10% of homes development should either meet wheelchair housing standards, or be easily adapted to meet them (Policy DP6).
- 6.113 All buildings should meet the highest practicable standards of access and inclusion, secure car parking for disabled people; and secure accessible homes (Policy DP29).

### Open Space

- 6.114 Where developments create an additional demand for open space improvements to open spaces will be sought (Policy CS15).
- 6.115 Where on-site provision of open space is not possible, the Council will consider other options such as off-site contribution or the payment of a financial contribution towards obtaining land for open space use (Para 15.13). Biodiversity will also be encouraged through the provision of different means such as green or brown roofs (Para 15.18).
- 6.116 LB Camden will only grant planning permission for development that is likely to lead to an increased use of public open space where an appropriate contribution to the supply of open space is made. Schemes of 5 or more additional dwellings are considered to increase the demand for public open space and will be expected to make a contribution to meeting that additional demand (Policy DP31).
- 6.117 Schemes over 100 dwellings or 30,000 sq m floorspace will be expected to contribute on-site open space, whilst play space provision and natural and semi-natural green-space will be expected for schemes over 60 dwellings.

### Basements

- 6.118 In determining proposals for basement and other underground development, LB Camden will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. Basement development will only be permitted where it does not cause harm to the built and environment and local amenity and does result in flooding or ground instability (Policy DP27). Further guidance on Basement Impact Assessments is set out in Camden's dedicated supplementary planning guidance (CPG 4 Basements and Lightwells).

### Amenity

- 6.119 The Council will only grant permission for development that does not cause harm to amenity. The factors to be considered will include:
- Visual privacy and overlooking;
  - Overshadowing and outlook;
  - Sunlight, daylight, and artificial light levels;
  - Noise and vibration levels;



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- Odour, fumes and dust;
  - Microclimate; and
  - Inclusion of appropriate attenuation measures.
- 6.120 Developments will also be required to provide acceptable standards of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space; facilities for the storage, recycling and disposal of waste; facilities for bike storage and outdoor space for private or communal amenity space as set out above (Policy DP26).
- 6.121 Policy DP32 sets out that air quality assessment will be required when development could potentially cause harm to air quality.
- 6.122 The Amenity SPG sets out more detailed require in respect to:
- **Air Quality**
    - new developments should endeavour to be air quality neutral;
    - an air quality assessment will be required for developments that including CHP/CCHP, should this reveal negative impact to surrounding air quality mitigation measures will be required.
  - **Noise**
    - where noise levels for new developments potentially exceed existing noise levels natural screening should be considered to buffer the noise levels.
  - **Construction**
    - Regarding the phasing element of the development a Construction Management Plan will be necessary as the construction process will have a significant impact on adjoining properties;
    - With new developments the Council expects that at least one window of a habitable space to face within 90 degrees of south.
  - **Rights to Light and Privacy**
    - For existing buildings the principal concern regards the overall loss of daylight as opposed to the minimum acceptable levels of daylights;
    - If an existing property has experienced uninterrupted light for more than 20 years then by law they are entitled to maintain the same levels of light irrespective of any new developments.

### MATERIAL CONSIDERATIONS

#### Mayor’s Housing SPG (November 2012)

- 6.123 The Mayor’s Housing SPG supplements the housing policies in the 2011 London Plan, providing detail on how to bring forward good quality and well designed homes. The SPG also recognises the new affordable housing category of affordable rent.
- 6.124 Part 1 deals with housing provision, stating that the targets in London Plan Table 3.1 are minimum benchmarks. The SPG provides further guidance on optimising housing density (London Plan Policy 3.4) and how to calculate residential density on sites. Notwithstanding this, it acknowledges that when coming to a view on appropriate density that proper weight is give to the range of relevant qualitative concerns set out in London Plan Policy 3.5.

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- 6.125 Part 2 addresses housing quality and sets out design standards for neighbourhoods and individual dwelling, which are broken into: “baseline” that new homes should meet and be addressed in Design and Access Statements; and “good practice” standards which represent good practice and are aspiration and unlikely to justify refusal of planning permission.
- 6.126 In addition to minimum unit sizes the standards also seek to promote dual aspect dwellings for north facing units, a minimum of 5 sq m of private outdoor space for 1-2 dwellings (with an extra 1 sq m for each additional occupant) and minimum depth and widths for balconies of 1,500 mm. In exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement. The SPD highlights that consideration should be given to the standards alongside achievement of the other objectives of the London Plan.
- 6.127 Part 3 considers housing choice, primarily in respect to meeting the requirements of distinct groups.
- 6.128 Part 4 provides guidance on implementing affordable housing policies, in particular to maximise affordable housing provision to meet objectively assessed needs. In particular, the SPG provides guidance on application of the new Affordable Rent product, however, this guidance has now been superseded by the London Plan REMA (October 2013).

### The London View Management Framework (March 2012)

- 6.129 The London View Management Framework is a key part of the strategy to preserve London’s character and built Heritage managing the impact of development on key panoramas, river prospects and townscape views.
- 6.130 The Site lies within the foreground of the protected vista from the summit of Parliament Hill to St. Paul Cathedral (2A.1). The panorama is sensitive to large-scale development in the foreground and middle ground. New development should preserve or enhance any viewer’s ability to recognise St. Paul’s Cathedral and its western towers. The position of the Site within the viewing corridor prohibits any development proposals for the Site to exceed 70-75 metres AOD.

### Camden Supplementary Planning Guidance (CPG1 – 8)

- 6.131 Camden have produced a raft of supplementary planning guidance which provides further detail on how policies will be implemented for specific topics:
- CPG1 Design (September 2013);
  - CPG2 Housing (September 2013);
  - CPG3 Sustainability (September 2013);
  - CPG4 Basement and Lightwells (September 2013);
  - CPG5 Town Centres, Retail and Employment (September 2013);
  - CPG6 Amenity (September 2011);
  - CPG7 Transport (September 2011); and
  - CPG8 Planning Obligations (September 2011).

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6.132 Regard has been had to the additional guidance, and is referred to where relevant in both the above description of the statutory development plan and the policy assessment within the next section (Section 7.0).

### Camden Annual Monitoring Report (April 2012 – March 2013)

#### Housing (incl. five year housing land supply)

- 6.133 The AMR sets out in 2012/13 a net total of 545 self-contained homes were completed, which falls below the annualised London Plan housing target (665). Notwithstanding this, the Council consider they are on track to meet its target for new housing over the plan period, based on their housing trajectory.
- 6.134 The Housing Trajectory includes the five-year land supply, required by the NPPF<sup>2</sup>. The five year supply of deliverable sites housing amounts to 7,072 homes (or circa 1,414 homes per year), exceeding the London Plan target.
- 6.135 The five year land supply has been informed by:
- the likely level of housing that could be provided if unimplemented planning permissions are implemented;
  - land availability by identifying buildings or areas of land that have development potential for housing, including those within mixed use developments, and the potential level of housing that can be provided on identified land;
  - evaluating past trends in windfall land coming forward for development and estimated the likely future implementation rate;
  - identifying constraints and issues that might make a particular site unavailable, unviable or unsuitable for development.
- 6.136 Table 3 sets out the site’s that the Council have identified as having potential to deliver housing during the next five years having regard to the above criteria. In addition to listing sites that have planning permissions and are allocated within the “saved” UDP and site allocations document that have the potential to make a significant contribution to housing delivery during the 5 year period, the Table included a section on “additional Local Authority sites”.
- 6.137 With regard to affordable housing, in 2012/13 299 net affordable dwellings were completed, 53% of all net additional homes completed in the Borough. The AMR Table 4 demonstrates how the overall proportional of completed affordable homes has swung from one year to another between 2008/9 and 2012/13. In 2010/11 only 142 (19%) affordable units were provided and in 2011/12 this was 164 (30%).

#### Employment

- 6.138 In 2012/13 a total of 3,765 sq m of B1 floorspace was completed and 16,280 sq m was removed through the change of use or redevelopment, resulting in a net loss of 12,254 sq m of B1 floorspace.

<sup>2</sup> The NPPF requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.

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- 6.139 Whilst the Council have seen a net loss of office floorspace over the last seven years, the AMR sets out that there is still a good supply of office floorspace project for development with approximately 520,000 sq m net additional floorspace expected over the plan period. Approximately 460,000 sq m of will be developed at King’s Cross Central.
- 6.140 In 2012/13 there was no change in the amount of B2 industrial space and a small loss of B8 storage and distribution space.

### London Borough of Camden Draft Local List (October 2013)

- 6.141 The Local List will recognise elements of the historic environment that are not already designated in another way (for example a Listed building), but which may nonetheless contribute to a sense of place, local distinctiveness and civic pride. These are known as ‘non-designated heritage assets’.
- 6.142 Public consultation on the draft Selection Criteria took place from July - September 2012. Responses were reviewed before the revised Selection Criteria were adopted on 14 November 2012.
- 6.143 Between November 2012 – January 2013, public consultation inviting nominations for the Local List took place. Nominations were then reviewed against the Selection Criteria before being presented at the Selection Panel meeting. The Panel met in May 2013 for a final assessment of the nominations, with the aim of producing a draft Local List ready for consultation. The Selection Panel was made up of people living/working in Camden with knowledge and expertise reflecting the range of items nominated during the public consultation – including the historic environment, architecture, community, public arts and historic landscape.
- 6.144 Following the Selection Panel meeting the draft Local List was published for public consultation from 28 October until 20 December 2013, with the omission of 79 Camden Road and 86 – 100 St Pancras Way.
  - Items on the Local list are identified as non-designated heritage assets. As such, their significance will be a material consideration in planning decisions.
  - There will be a presumption to preserve the particular significance of a non-designated heritage asset, and this will be balanced against other material considerations when assessing a planning application.
  - Being on the Local List is not the same as being ‘Listed’ in the statutory sense and a listed building consent application will not be required for works to the feature.
  - Inclusion on the Local List will not affect permitted development rights. However if we consider that works carried out under permitted development rights would result in the significance of the heritage asset being undermined, we may consider introducing an Article 4 direction to remove some or all permitted development rights
  - Applications for planning permission for works affecting an item on the Local List will be required to show how the significance of the asset has been taken into consideration in the design of the proposed works.

### Camden’s Evidence Base

#### Employment Land Review (June 2008)

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6.145 The Camden Employment Land Review was commissioned by the Council to assess the future demand for employment land and compare it with land supply provided under the then current planning policies (Camden’s UDP).

6.146 The study dealt with two broad land uses: industry/ warehousing and offices (covered by Classes B1 – B8).

### Offices

6.147 In regard to offices generally, it recommends that Camden should safeguard existing offices in the Midtown (Central London) area against redevelopment for housing or other uses if it wants to meet commercial demand and London Plan targets.

6.148 The application site falls between Camden Town and Kentish Town Centres (approximately 650 metres from both). The Employment Land Review recognises in Camden Town and Kentish Town that:

#### ■ Camden Town:

- The office market caters largely for smaller, local businesses;
- There is limited market of medium to large office occupiers prepared to contemplate locating;
- Two larger buildings have been delivered in recent times: Camden Point (on Camden Road) delivered 3,200 sq m for the British Transport Police and at the time of writing the Centro Scheme (7,900 sq m) had only been partially let;
- Remains generally a secondary office location, with few large buildings or large occupiers which may be due to a lack of interest from larger businesses or a difficulty assembling sites;

#### ■ Kentish Town:

- Is one step further removed from the main office market;
- The area does not compete in any practical sense for office occupiers, rather caters for local demand and smaller firms;
- There is probably little demand for new office space, certainly not to the larger, corporate sector, but sites are available should the private sector choose to invest.
- Kentish Town is not an established office location and there appears to be no overriding reason why it should become one.

### Industrial / Warehousing

6.149 The Review recognises that Camden’s stock of industrial / warehousing space is small, shrinking, scattered and ageing. The Review provides a qualitative assessment of employment sites and areas in Camden that are considered suitable and attractive for employment uses, having regard to:

- Accessibility by different means of transport;
- The internal environment of the site or area;
- Its external environment, or surroundings, including the compatibility with surrounding land uses;
- Where there are buildings on the site, their quality and condition; and

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- Direct market evidence, such as vacancy levels in the neighbourhood.
- 6.150 The application site is not recognised within the Review, however, reference is made to the Kentish Town Road/ Highgate Road and Regis Road Industrial Area towards the north of Kentish Town.
- 6.151 This is recognised as the most important industrial property resource benefitting from the following characteristics:
  - It has critical mass;
  - It is well managed;
  - It is more or less full; and
  - It houses a range of occupiers; and
  - It is only large area of land in the Borough containing a mix of business uses but no housing.

### Camden Business Premises Study (2011)

- 6.152 The Camden’s Business Premises Study (2011) was prepared to inform implementation of Camden’s policies relating to employment uses (CS8 and DP13). In particular, it sought to explore the features of employment sites and buildings that should be provided to support a flourishing and diverse local economy.
- 6.153 The Study sets out that at the time of its writing Council has had little real-life experience of delivering its current employment land policies, due to their recent adoption. The guidance is therefore intended to set out what features new employment space should possess to secure occupiers and in what circumstances the Council should encourage retention of existing buildings, or alternatively, redevelopment to provide new space.

### Industrial

- 6.154 The Study recognises, in line with the Core Strategy, that “office space is a lesser priority” (Paragraph 1.4). The analysis therefore focuses on lower-value employment uses, defined as industrial uses and secondary (low-cost) offices.
- 6.155 The Study defines three categories in existing industrial stocks:
  - Category 1 – which is prime stock providing ideal industrial accommodation, with the following characteristics:
    - unencumbered access for commercial vehicles;
    - 24-hour operation with no loading restrictions or other restricted hours;
    - Minimal risk of causing nuisance to nearby residents and primate quality buildings;
    - Prime quality;
    - Predominately single storey with high bays;
    - Property type is often portal frame.
  - Category 2 – sites that are serviceable but less than ideal. The Report notes that most of Camden’s industrial stock is somewhat compromised and therefore cannot meet the characteristics of Category 1. It is considered occupiers are universally unwilling to compromise on and therefore even Category 2 sites must provide:

## 6.0 Legislative and Policy Overview

- Access for large commercial vehicles;
  - Freedom of operation without unduly restricted hours and without being considered a bad neighbor by adjoining residential development;
  - However businesses will compromise on the physical characteristics of the building, and therefore if such buildings are no longer fit for purpose it is considered that it is generally viable for owners to repair, refurbish, alter or replace them to provide lettable space.
  - Category 3 – are heavily compromised. They are characterised by poor access, incompatible neighbouring uses and too-high site coverage (often close to 100%). Once such buildings become obsolete or need major repair, the investment that would make them fit for purpose again is not financially viable.
- 6.156 Accordingly the Study recommends that whilst Category 1 and 2 sites should be retained, Category 3 sites should be released.
- 6.157 The Study also reviews mixed use redevelopment as an option in retaining industrial space. In regard to redevelopment of industrial alongside residential the Study sets out:
- “in our opinion, such redevelopment often provides sub-optimal employment space. To get planning permission, the space created must have “ticked boxes” in terms of access, light, servicing etc. But typically it does not provide what occupiers need.*
- The problem is that residential and industrial uses by their nature do not make good neighbours (Para 2.54 – 55)”.*
- 6.158 In particular it highlights the following problems / areas to avoid:
- Vertical separation where industrial space is provided on the ground floor of residential blocks (Para 2.56);
  - Insufficient attention in terms of design, specification and space apportioned.
- 6.159 For larger sites, where horizontal separation can be achieved, and the site split into two, then industrial and residential can be successful if carefully designed.

### Offices

- 6.160 The Study acknowledges that outside the CAZ the demand for offices is relatively weak with much of the demand value driven (Para 3.3).
- 6.161 Value driven occupiers are typically small (occupying less than 500 sq m or less) (Para 3.3).
- 6.162 Many business premises are occupied by ‘quasi-office’ or ‘quasi-industrial’ (Para 3.6), occupying studios or business uses. Such occupiers are recognised as typically seeking flexible leases (Para 3.6).
- 6.163 Business are often found in converted industrial properties which have been subdivided and they are often offered on short-term leases (Para 3.7).
- 6.164 The Study highlights that:
- “the occupiers of business units typically have a wide area to choose from and are not tied to Camden as a location. However, they may be attracted to specific micro-locations by the presence of clusters” (Para 3.10).*

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6.165 Moreover, “quantitatively there is no shortage of business units either in Camden or elsewhere in London; and therefore no obvious need for planning policy actively to promote new provision”.

6.166 The Study concludes at paragraph 3.13 that:

*“our analysis supports the stance of Policy DP13, that if an employment site is not suitable for any business use other than B1(a) offices it may be released for housing development”*.

6.167 The Study also reviews mixed use redevelopment as an option in retaining office space. It acknowledges that some offices as part of mixed use can be successful if they are in the right locations, towards central London, where the office market is strong (Para 3.14). Nevertheless it cautions that “generally such offices have proved difficult to let in Camden”, due to:

- Market conditions in much of the Borough are such that there is little or no demand for new office space;
- Offices in mixed-use development are compromised in terms of quality;
- Office occupiers tend to prefer to operate on the upper floors, whilst they tend to be provided with ground or otherwise residential blocks in mixed use schemes;
- Space is hard to let where developers attempt to provide non-traditional types of space in their mixed use schemes in an attempt to increase the development density of a plot;
- Employment space will usually not be fitted out.

6.168 The Study therefore:

*“supports the stance of Policy DP13, that is an employment site is not suitable for any business use other than B1(a) offices it may be released for housing development. More generally, we suggest that planning in Camden should not encourage developers to include office provision in mixed-use schemes, especially as a replacement of industrial space lost in redevelopment. Occupiers generally do not want these offices, and providing them does nothing to mitigate the loss of industrial space” (emphasis added).*

### **Camden Strategic Appraisal of Council-owned Employment Land (2012)**

6.169 Camden’s Strategic Appraisal of Council-owned Employment Land was prepared to guide future decisions on the disposal, redevelopment and management of sites in its ownership as part of its wider Community Investment Programme (CIP).

6.170 The Report recognises that disposal of employment sites can make a significant contribution to the CIP, but risks going against planning policy. Paragraph 1.4 states that:

*“to reconcile the aims of the CIP and those of planning policy, the Council needs to ensure that the sites transferred to other uses are those which contribute least to the economy, and that any losses of useful employment space are offset by intensification and better management of the remaining estate or development of new employment space”*.

6.171 Further the Report provides an appraisal of the Council’s employment sites. Despite being under the ownership of the Council at the time of publication of the Report (July 2012), the site is not included within the assessment suggesting that the Council did not regard the site’s existing use to be for light industrial use or for future use.

6.172 Of note, in assessing which sites could be suitable for managed release to other uses the Report sets out that it is important to have regard to the quantity of employment space and



## 6.0 Legislative and Policy Overview

quality and occupancy. The Report refers to the three tier scoring system of employment sites (set out above in regard to the Business Premises Study).

- 6.173 Notwithstanding this, the assessment also set out considerations when having regard to whether a site is suitable for mixed use development. In particular, it comments that:
- Any mixed use redevelopment should provide horizontal separation, where industry and housing are in separate blocks side by side, with enough space between the two to avoid bad neighbour problems; and
  - The Council should not encourage mixed-use redevelopment where industrial space is provided on the ground floor of residential blocks.

### Class J of Part 3 of the Second Schedule to the Town & Country Planning (General Permitted Development) (As Amended) Order 1995

- 6.174 Amendments to the GPDO ("the Order") came into force on 30 May 2013 and included a new Class J, which grants the permitted change of use of a building and any land within its curtilage from a use falling within Class B1(a) (offices) in the Use Classes Order to a use falling within Class C3 (dwellinghouses).
- 6.175 This legislation is a material consideration as it demonstrates the Government's desire to facilitate the change of use from B1 to residential to meet housing needs.
- 6.176 Prior to the amendments to the Order coming into force, Government consulted over the changes. In particular, local authorities were invited to apply for exemption to the permitted development rights where it was demonstrated that the introduction of the permitted development rights in a particular area would lead either to the loss of a nationally significant area of economic activity or to substantial adverse economic consequences at the local authority level which are not offset by the positive benefits the new rights would bring.
- 6.177 The Mayor submitted evidence to demonstrate exemption from the permitted development rights for London's key business districts in recognition of their significance as nationally important office locations. In particular, this included the Central Activities Zone. In parallel to this LB Camden also submitted a separate request for exemption.
- 6.178 The Order clarifies that within the LB Camden, the area of exemption is limited to the CAZ only. Therefore, outside of the CAZ existing commercial office buildings will benefit from permitted development rights for change of use to residential.



## 7.0 Planning Assessment

### INTRODUCTION

- 7.1 This section provides an assessment of the proposed development in relation to planning policy and material considerations relevant to the determination of the application (set out in Section 6).
- 7.2 It is considered that the key planning issues, arising from discussions with officers, members and following on from the public consultation, are:
- Principle of Redevelopment;
  - Loss of Employment Floorspace;
  - Proposed Residential Uses, Standards and Amenity;
  - Design;
  - Heritage;
  - Transport, Construction Management, Access and Parking;
  - Energy and Sustainability;
  - Neighbouring Amenity;
  - Basement and Lightwells;
  - Flood Risk; and
  - Planning Obligations (Section 106 Heads of Terms and Mayoral Community Infrastructure Levy).

### PRINCIPLE OF REDEVELOPMENT

- 7.3 The proposed development will demolish existing, vacant buildings providing outdated and inefficient office accommodation to deliver 166 new homes, including 84 affordable units, at a highly sustainable location.
- 7.4 Section 4 of this Statement described that the site benefits from excellent public transport accessibility (PTAL 6a) to provide access to jobs within Central London and beyond, proximity to local education, health and other local services within the immediate neighbourhood, as well as shopping and leisure facilities within Camden Town, Kentish Town and the parade of local shopping.
- 7.5 By virtue of its characteristics and location the site is considered entirely appropriate for redevelopment, in accordance with NPPF (Paragraph 37), the strategic policies of the London Plan and Camden's spatial policies (Policy CS1 and CS4).
- 7.6 Moreover, the proposed development will contribute to the NPPF's economic, social and environmental sustainable development objectives (as detailed at Paragraph 7), through bringing a site back into active uses and helping to address London and Camden's local housing need.
- 7.7 In accordance with Camden Policy CS1, the proposed development will make the efficient use of land, having regard to the surrounding urban environment, heritage, amenity and transport considerations. The applicant completely revised the initial design concept (explained in Section 5 of this Statement and the Design and Access Statement) to optimise use of the site. The revisions from a "spine" concept to a perimeter block approach allowed for an optimisation of residential density whilst also providing high quality amenity space in the centre of the site. (Urban design is assessed in full later in this Section).

## 7.0 Planning Assessment

- 7.8 The principle of redevelopment to optimise use of the brownfield site to provide for the Council’s priority land use is therefore considered entirely appropriate and in accordance with the strategic objectives of the NPPF, London Plan and Camden’s own policies. The next section assesses the proposed change from B1(a) to residential (C3) at the site.

### PROPOSED LOSS OF EMPLOYMENT FLOORSPACE

- 7.9 The proposals will redevelop the site which was last occupied by the Council for B1(a) offices for residential (C3) uses.
- 7.10 Housing is the Council’s “top priority land use” (Camden Policies CS6 and DP2). Notwithstanding this, policies CS8 and DP13 seek to safeguard existing employment sites and premises that meet the needs of modern industry and other employers. Camden’s own policies identify circumstances where office and business floorspace should be released. Where release is justified, the Council’s priority is for the replacement uses to be permanent housing (DP13 and CPG5).
- 7.11 The NPPF takes a stronger stance in directing LPAs to approve applications for change to residential use, where there is an identified need for additional housing in that area and “not strong economic reasons why such development would be inappropriate” (NPPF Paragraph 51).
- 7.12 In accordance with NPPF Paragraph 22 any applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different uses to support local communities.
- 7.13 The following assessment of the proposed loss of employment floorspace therefore has regard to:
- The relative need for different uses, including:
    - Identified need for additional housing;
    - Other alternative uses;
  - Economic Reasons and market signals in regard to:
    - Re-use for offices;
    - Re-use for other employment uses; and
    - Incorporation of an element of business uses in the redevelopment proposals.

### Relative Need for Different Uses

#### Identified Need for Additional Housing

- 7.14 It is proposed that the site would be redeveloped for residential (C3) uses. In their current form the proposals would deliver 166 new homes of which our proposed 50% would be provided as affordable homes (based on GEA floorspace), across a range of unit sizes. Housing, and in particular affordable family homes, are identified as the priority land use within Camden’s LDF.
- 7.15 Whilst, Camden’s 2012 – 13 Annual Monitoring Report (“AMR”) sets out that the Council is currently on course to meet its long term housing supply targets, over the April 2012 – March 2013 period a net total of 545 self-contained homes were completed, which falls below the annualised London Plan housing target (665 homes). The proposals will make an important contribution to meeting these ambitious targets.

## 7.0 Planning Assessment

- 7.16 It is therefore considered that the loss of surplus employment floorspace to provide residential accommodation responds to the relative need for different uses in accordance with NPPF Paragraph 22.
- 7.17 Moreover, the proposed redevelopment for residential uses is fully supported by NPPF Paragraph 51 which instructs LPAs to bring empty buildings into residential use, where there is an identified need for additional housing in the area.

### Community Uses

- 7.18 Whilst Paragraph 51 of the NPPF instructs empty buildings to be reused for residential, Camden’s policies also allow for change of use to community uses.
- 7.19 As abovementioned, housing is considered the priority land use for the site having regard to Camden’s LDF priorities. Notwithstanding this, and for completeness in response to feedback during the pre-application discussions and consultation, the applicant has undertaken an analysis of surrounding GP and dental surgery provision and capacity (within 800 metres of the site in accordance with Building for Life Assessments). A copy of the full assessment is provided at Appendix 2 of this Statement.
- 7.20 Three GP surgeries are identified within 800 metres of the site, all of which at the date of this submission are accepting new patients. The average GP to patient ratio for this area is 1 to 924 (Table 8.1). This falls substantially below the average for the Camden Clinical Commissioning Group which is 1 GP per 1477 patients. Moreover, the standard level of provision assumed by the NHS and Department of Health Planners used to inform the ODPM Reforming Planning Obligations Document (November 2004) cites a standard level of 1 GP per 1,700 residents.

**Table 7.1: GP Provision within 800 metres of the site**

WALKING DISTANCE FROM SITE	NAME OF GP SURGERY	POSTCODE	ACCEPTING PATIENTS?	NUMBER OF GPs	PATIENTS	GP: PATIENT RATIO
0.643	1 - James Wigg Group Practice	NW5 2BX	Y	24	18,282	1 : 762
0.8	2 - Plender Street Practice	NW1 0LB	Y	1	2,998	1 : 2,998
0.8	3 - Amptill Practice	NW1 1TN	Y	5	6,428	1 : 1,286
				<b>30</b>	<b>27,708</b>	<b>1:924</b>

- 7.49 The proposed development of 166 units will generate additional demand on services from approximately 300 adults and children. It is therefore considered that this demand will have a negligible impact upon capacity, and can be readily accommodated within the existing local supply without giving rise to the need for provision of a new surgery.

## 7.0 Planning Assessment

7.50 With regard to NHS dental practices, there are six within 800 metre walking distance of the site. All are accepting new patients (Table 8.2)<sup>3</sup>.

**Table 7.2: Dentist Surgery Provision within 800 metres of the site**

WALKING DISTANCE FROM SITE	NAME OF DENTAL SURGERY	POSTCODE	ACCEPTING PATIENTS?
0.32	1 - Iny House Dental Practice	NW1 8NX	Yes
0.8	2 - Kentish Town Urgent Dental Service	NW5 2AJ	Yes
0.48	3 - Associated Dental Practices	NW1 9PY	Yes
0.8	4 - IS Dental Care	NW5 2AG	Yes
0.8	5 - Camden Dental Centre	NW1 7JL	Yes
0.78	6 - Parkway Dental Care	NW1 7AN	Yes

7.75 There is existing capacity with the surrounding GP and dental practice network to accommodate the estimated additional 300 residents from the proposed development and there is not sufficient demand to merit provision of a new facility on the site. In accordance with CS10, DP15 and CPG8 it is therefore considered that it is more appropriate to provide a financial contribution to contribute towards existing health facilities. Further details of Section 106 Heads of Terms are set out later in this Section.

### Retail

- 7.76 Whilst the application site is located to the north-west of Camden Road Neighbourhood Centre and approximately 650 metres from the edge of the Town Centre of Camden Town, it is not within a designated Town Centre.
- 7.77 The site therefore falls outside a location where the NPPF, London Plan and Camden’s policies (Policy CS7 and DP12) promote the distribution of retail growth.
- 7.78 Notwithstanding this, the applicant has had initial discussions with a number of retail occupiers with regard to incorporating an element of retail within the development proposals. The feedback provided has indicated that there is insufficient demand to justify inclusion of retail space into the development.

### Economic Reasons / Market Signals

7.79 In this case there are no strong economic reasons why the proposed development (and associated loss of existing use) would be inappropriate. This position is supported in Camden’s own evidence base (referred to in detail in Section 6 of this Statement) and within

<sup>3</sup> A dentist : patient ratio was not possible to determine from the dental practices surveyed, owing to the manner of how NHS and private patients are sub-divided for each dentist.

## 7.0 Planning Assessment

the further evidence provided in the Employment Statement which accompanies this submission.

### Re-Use for Offices

- 7.80 The Camden Employment Land Review (2008) indicates that across the Borough the projected supply of office floorspace is estimated to meet demand over the plan period from 2006 to 2026. There has been no subsequent indication (through the Council’s Annual Monitoring Reports) that the projected office supply would not meet demand for this period.
- 7.81 The 2008 Review identifies Camden Town and Kentish Town as removed from the main office market. It states Kentish Town does not compete in any practical sense for office occupiers, rather caters for local demand and smaller firms. The application site is one step further removed from the Kentish Town (and Camden Town) market and thus represents a less attractive location for occupiers still.
- 7.82 This position was supported in the Council’s Business Premises Study (2011) which acknowledges that:
- “outside the CAZ the demand for offices is relatively weak with much of the demand value driven” (Para 3.3).*
- 7.83 As explained in Section 6 of this Statement, occupiers in such locations are typically small (500 sq m or less), quasi-office or quasi-industrial occupiers in properties that have been subdivided and are offered on short-term, flexible leases.
- 7.84 A total of 7,188 sq m B1(a) currently exists at the site, which is substantially above the quantum of floorspace typically sought by occupiers in the site’s location.
- 7.85 Moreover, as abovementioned, Camden’s Business Study (2011) recognises that even smaller occupiers:
- “typically have a wide area to choose from and are not tied to Camden as a location... and quantitatively there is no shortage of business units either in Camden or elsewhere in London; and therefore no obvious need for planning policy actively to promote new provision....” (Para 3.10 – 3.11).*
- 7.86 Thus, within Camden’s Evidence Base there is no justification to support the retention of office floorspace at the site’s location based on market signals.
- 7.87 Notwithstanding this, the Employment Statement that accompanies this planning submission assesses the economic viability of refurbishment and continued use of the property as a whole building or as part of a multi-let arrangement, having regard both to the condition and functionality of the existing building and local commercial market conditions in accordance with the tests of the NPPF, London Plan and Camden’s own policies and guidance (CS8, DP13 and CPG5).
- 7.88 Specifically it assesses the potential for:
- Option 1 – light refurbishment of the building in the existing condition for offices (including for business units/ SMEs);
  - Option 2 – comprehensive refurbishment of the building for office use (including for business units/SMEs); and
  - Option 3 – complete redevelopment of the site for a new office building (including for business units/SMEs).

## 7.0 Planning Assessment

- 7.89 It has been informed by a Building and Feasibility Cost Survey to bring the accommodation to a standard deemed suitable to meet modern occupier requirements and up to date specialist advice from local commercial agents.
- 7.90 It is considered the buildings cannot be re-let in their present condition. The Feasibility Cost Survey lists the essential works, and associated costs, required just to bring the buildings back into active use and comply with relevant modern standards (Option 1 – light refurbishment). Works and a costing are also provided for bringing the accommodation to a standard deemed suitable to meet occupier requirements (Option 2 comprehensive refurbishment). Notably, the costs of a light refurbishment for essential works is not substantially lower than those estimated for a more substantial refurbishment.
- 7.91 The Employment Statement concludes the estimated costs associated with both the light refurbishment and bringing the accommodation to a standard deemed suitable to meet occupier requirements would require substantial investment, which is not considered financially viable given the likely market rent and very limited occupier demand that exists. Moreover, it is not considered that it would be possible to obtain development finance for a complete office redevelopment at the site. Accordingly there is no reasonable prospect of the site being reused, in whole nor in part.
- 7.92 The evidence within the Employment Statement has had particular regard to Camden’s detailed criteria against which proposals for loss of employment use should be assessed (within the text accompanying Policy DP13 [Para 13.3] and CPG5), to support the change of use.
- 7.93 As previously mentioned, the criteria of DP13 are considered to focus on the loss of industrial uses, whilst CPG5 provides criteria more relevant to offices. In assessing its re-use for the offices, the application site is assessed against these criteria of CPG5 in Table 7.3 (below). Commentary on other employment uses follows later in this Section.

**Table 7.3: Assessment against CPG5**

Criteria of Paragraph 6.4 of CPG5	Assessment
The age of the premises;	<p>The accommodation does not represent modern office floorspace: 79 Camden Road was built circa 1960s; and 86-100 St Pancras Way dates from the 1930s, with its extensions added between 1939 and 1948.</p> <p>The Employment Statement (in particular its Feasibility Cost Study) set out that whilst there is no visual evidence of any significant structural defect, the structure, fabric and provision of engineering services are dated in specification and have been subject to a period of neglect.</p>
Whether the premises include features required by tenants seeking modern office accommodation;	<p>The premises are not considered to include features required by tenants seeking modern office accommodation.</p> <p>The Employment Statement sets out that continued use of the property in its existing form will require substantial works of refurbishment to address disrepair. There are numerous items of backlog maintenance which should be addressed in the short term, including external works with the roofs, elevations</p>



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	<p>and windows, and complete internal refurbishment to conform with Building Regulation requirements.</p> <p>Notwithstanding the scope of any such work, the Employment Statement sets out that the scope for use of the buildings as high quality modern accommodation is severely constrained by the form of construction which fails to meet modern performance requirements for offices.</p> <p>Moreover, as part of the marketing material an independent review was undertaken of the existing facilities at the site. The Council provided a Memorandum in response which sets out that 79 Camden Road and 86 – 98 St Pancras Way were considered “un-modernised and of poor quality”, deemed unsuitable for delivery of modern social services.</p> <p>Whilst 100 St Pancras Way, was recognised as offering comparatively more modern office facilities, even this was vacated for improved accommodation elsewhere in the Borough in Summer 2012.</p>
<ul style="list-style-type: none"> <li>■ The quality of the premises and whether it purpose built accommodation;</li> </ul>	<p>The existing buildings were not purpose built for offices. Over the past sixty years they have been significantly extended and altered to provide for a range of light industrial and later offices uses (as described in Section 3 of this Statement).</p> <p>As abovementioned, the Employment Statement sets out that substantial refurbishment works are required just to address disrepair, whilst, the scope of use of the buildings as high quality modern accommodation is severely constrained by the form of construction (including, the structural arrangement and key structural dimensions).</p> <p>Moreover, the majority of vestiges of previous industrial uses have disappeared, compromising re-use for light industrial or warehousing. In particular, the works associated with the 2002 consent for temporary change of use of 79 Camden Road for a doctor’s surgery resulted in the removal of the rear servicing access from Rochester Mews and creation of additional office space in its place.</p>
<ul style="list-style-type: none"> <li>■ Whether there are existing tenants in the building, and whether these tenants intend to relocate;</li> </ul>	<p>The existing buildings are vacant.</p> <p>The Council’s records indicate that 79 Camden Road and 86 – 98 St Pancras Way were vacated in Spring 2010 by Camden Social Services. Camden Parking Solutions occupied 100 St Pancras Way until September 2012.</p>
<ul style="list-style-type: none"> <li>■ The location of the premises and evidence of demand for office space in this location;</li> </ul>	<p>Section 6 of this Statement and above Paras 7.80 – 7.91 provide a review of Camden’s own evidence base which indicates there is no justification to support the retention of office floorspace at the site’s location based on market signals.</p>

## 7.0 Planning Assessment

	<p>The applicant’s Employment Statement (and appended local market commentary) supports this position.</p> <p>In particular, both the Council’s evidence, the local market commentary provided by Currell’s Commercial and marketing campaign undertaken by Deloitte on behalf of the Council indicate:</p> <ul style="list-style-type: none"> <li>■ The site is a secondary location outside the main Camden and Kentish Town Centres, which in themselves are considered secondary markets with much of demand value driven;</li> <li>■ Occupiers in this location typically seek premises in the 50 – 200 sq m size bracket. The floorspace at the site is substantially above the quantum typically required;</li> <li>■ The site was marketed for sale in 2011. Of the 23 offers received none were on the basis of retaining the site for employment uses in whole or part;</li> <li>■ The Employment Statement (in particular its Feasibility Cost Study) set out the accommodation is not appropriate, nor is it efficient, for sub-division for SMEs;</li> <li>■ Moreover, quantitatively there is no shortage of such space in Camden or elsewhere in London.</li> </ul>
<ul style="list-style-type: none"> <li>■ Whether the premises currently provide accommodation for small and medium enterprises.</li> </ul>	<p>As abovementioned, the premises are currently vacant. In their last occupation they were lent to two Council occupiers, whom occupied approximately 5,000 sq m (79 Camden Road &amp; 86 – 98 St Pancras Way) and 2,200 sq m (100 St Pancras Way). The buildings have therefore not previously provided for SMEs or “business units”.</p> <p>The Employment Statement (in particular it’s Feasibility Cost Study) set out the accommodation is not appropriate, nor is it efficient, for sub-division for SMEs or “business units”.</p> <p>In particular, significant re-configuration works would be required to 86 – 100 St Pancras Way to create a number of secure self-contained premises, suitable for a multi-let configuration around a shared reception. Meanwhile at 79 Camden Road, the position of existing cores limits potential subdivision of individual floors at the upper levels.</p> <p>Refurbishment for a multi-let arrangement would require a detailed feasibility study concerning the re-positioning or supplementary provision of a centrally positioned stair and lift cores, including vertical distribution of building services, in addition to the other works required to address disrepair.</p>

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	<p>The estimated costs associated with the necessary works would be substantial. When considered against the fact that SMEs occupiers are value-driven, seek flexible (short term) leases and the potential for only parts of the building is to be occupied, it is considered that re-use for SMEs would be both unviable.</p> <p>Moreover, as has been highlighted above, Camden’s own evidence indicates there is quantitatively no shortage for such space.</p>
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7.94 Table 7.3 demonstrates the loss of B1(a) floorspace at the site would accord with the considerations set out in CPG5.

### Re-Use for Other Employment Uses

7.95 In accordance with the provisions of DP13, the Employment Statement also considers the:

- Refurbishment of the building for other employment uses; and
- Redevelopment of the site of other employment uses.

7.96 It concludes that in its existing condition the site is also not suitable for B1(b), (c), B2 and B8. Obtaining development finance for any light industrial or warehousing uses would be unfeasible (for further justification see the Employment Statement).

7.97 In assessing its re-use for the other employment uses, the application site is assessed against these criteria of DP13 (Para 13.3). These criteria are understood to relate to the existing (employment uses) at the site rather than the proposed new uses. Accordingly the site and existing buildings are assessed against these criteria in Table 7.4.

**Table 7.4: Assessment against DP13 Para 13.3**

Criteria of Paragraph 13.3 of Development Policies Document	Assessment
Is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;	<p>The site is not located within a strategic industrial location (SIL).</p> <p>The site is surrounded by predominately dense residential, compromising suitability for light industrial or warehousing uses.</p>
Is in a location suitable for a mix of uses including light industry and local distribution warehousing;	<p>The site lies 650 metres to the north-east of Camden High Street. It is outside the main commercial centre and designated town centre.</p> <p>The immediately surrounding land uses are predominately residential, with the exception of television studios at 102 St Pancras Way and a decreasing number of units along Rochester Place.</p> <p>Whilst the site was previously used for light industrial uses, office use has been introduced at the site over its history.</p>

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	<p>Light industrial uses are understood to have stopped in their entirety during the 1990s.</p> <p>The majority of vestiges of previous industrial uses have disappeared, compromising re-use for light industrial or warehousing.</p> <p>The Employment Statement, (in particular it’s Feasibility Cost Study) set out that only the ground floor space fronting Rochester Place would be potentially suited to light industrial use.</p> <p>However, the works associated with the 2002 consent for temporary change of use of 79 Camden Road for a doctor’s surgery resulted in the removal of the rear servicing access from Rochester Place, further constraining any potential use of even this space.</p>
<p>Is easily accessible for the Transport for London Road Network and/or London Distributor Roads;</p>	<p>Camden Road (A503) and St Pancras Way (A400) are designated key distributional routes in the Borough.</p> <p>However, Camden Road forms part of TfL designated red routes. Consequently, no stopping is allowed along the Camden Road frontage or the southern end of St Pancras Way between Monday to Saturday 07.00 – 19.00.</p> <p>The main vehicular access to the site is consequently from St Pancras Way. As a result of the one-way system along St Pancras Way, it is not possible to turn up the road from Camden Road resulting in a need to travel along the surrounding road network.</p>
<p>Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;</p>	<p>The site has a PTAL of 6a (the highest), as it is located in close proximity to Camden Road Overground station and multiple 24 hour bus routes;</p> <p>Whilst it is in proximity to the Regent’s Canal and rail lines, transportation of freight using these methods would be complex in the dense, predominately residential urban location.</p>
<p>Has adequate on-site vehicle space for servicing;</p>	<p>There is an existing area of hard-standing providing vehicles access and car parking to the south of the main building along St Pancras Way. However, this does not provide for vehicle turning or servicing.</p> <p>As abovementioned, the previous rear servicing access from Rochester Place was removed around 2002 when works took place in respect to the temporary doctor’s surgery. Consequently, any future access for goods/ servicing has been compromised.</p>
<p>Is well related to nearby</p>	<p>The surrounding land uses are predominately residential, with the exception of television studios at 102 St Pancras Way</p>

## 7.0 Planning Assessment

land uses;	and a number of light industrial and live-work units along Rochester Place.
Is in a reasonable condition to allow the use to continue;	<p>The Employment Statement describes that the existing building is vacant and that the premises are not considered to include features required by tenants seeking modern office accommodation.</p> <p>Costs Feasibility Study that is appended to the Employment Statement describes the condition of the existing buildings on the site which have lead to their vacancy.</p> <p>The Study lists and costs the works required to support continued use of the building and considers both a comprehensive refurbishment and light refurbishment (comprising essential works). The costs associated with these refurbishment options are estimated at £9,130,000 and £8,850,000 respectively.</p>
Is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards;	<p>The site is situated within an area that is predominantly residential.</p> <p>As explained in Section 6 of this Statement, the application site is not recognised as within nor in immediate proximity to any industrial / warehousing area in Camden’s Employment Land review (2008). The nearest industrial sites are at Kentish Town Road/ Highgate Road and the Regis Road industrial area, more than 1 km from the site.</p>
Provides a range of unit sizes, particularly those suitable for small businesses (under 100 sq m).	Table 8.3 (above) and the Employment Statement describes the current site arrangements and the constraints of sub-dividing the premises for small businesses.

7.98 Table 7.4 demonstrates the loss of employment floorspace at the site would accord with the considerations set out in Camden’s Development Management Policies (DP13 and accompanying text).

### **Incorporation of some business use on the site**

7.99 Where a change of use has been justified, Policy DP13 also calls for the consideration of incorporating some business use on-site, with a high priority for retaining flexible space that is suitable for a variety of business uses. This is also considered in the Employment Statement.

7.100 The London Borough of Camden Business Premises Study (2011) reviews mixed used redevelopment as an option in retaining office space. It acknowledges that some office as part of mixed use can be successful if they are in the right locations, towards Central London, where the office market is strong (Para 3.14). Nevertheless, it caveats that, “generally such offices have proved difficult to let in Camden” due to:

## 7.0 Planning Assessment

- Market conditions in much of the Borough are such that there is little or no demand for new office space;
- Offices in mixed-use development are compromised in terms of quality;
- Office occupiers tend to prefer to operate on the upper floors, whilst they tend to be provided with ground or otherwise residential blocks in mixed use schemes;
- Space is hard to let where developers attempt to provide non-traditional types of space in their mixed use schemes in an attempt to increase the development density of a plot;
- Employment space will usually not be fitted out.

7.101 Moreover, the Business Premises Study explicitly states:

*“planning in Camden should not encourage developers to include office provision in mixed-use schemes, especially as a replacement of industrial space lost in redevelopment. Occupiers generally do not want these offices, and providing them does nothing to mitigate the loss of industrial space”.*

7.102 Furthermore, the Business Space Study set out there is no obvious need for planning policy to actively promote provision of new business space (Para 3.11).

7.103 By virtue of the site’s location, size and constraints, including access, servicing and management arrangements for the private and affordable housing, it is not considered to be suitable for the re-provision of offices use, including SMEs, on-site, and therefore subject to DP13 policy tests (c) – (g).

7.104 Further detail on the initial feasibility studies in regard to the incorporation of office floorspace within the redevelopment proposals is included in the Employment Statement. Having regard to the Camden’s own Business Premises Study, the constraints of the site and scheme and the local commercial market, the Employment Statement concludes it is not feasible, efficient or viable to incorporate employment floorspace within the redevelopment proposals

### Summary

7.105 In sum, there is no reasonable prospect of the site being reused for employment uses, and in accordance with the NPPF (Paragraph 22 and 51) and London Plan (Policy 4.2 and 4.4) it is entirely consistent for the site to be redeveloped for residential uses, including affordable family housing. The site also performs poorly against Camden’s specific criteria of where it is appropriate to retain office or employment floorspace (Policy DP13 and CPG5).

7.106 Moreover, the site is not situated within an area that has been granted exemption status from the recently introduced permitted change of use of existing office buildings to residential accommodation. Given that exemption status has only been granted to areas where the loss of office floorspace would give rise to adverse economic and social consequences to the local economy, it is considered in accordance with paragraph 51 of the NPPF, that the loss of the existing office accommodation at the application site would clearly be offset by the overwhelming benefits that would arise from the redevelopment of the site for residential accommodation, including much need affordable housing.

7.107 Accordingly, the loss of employment floorspace to enable the site’s redevelopment for a priority land use within the London Borough of Camden should be allowed to contribute to London and Camden’s supply of housing (London Plan Policy 3.3 and CS Policy CS1, CS6 and DP2).

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### PROPOSED RESIDENTIAL USES

- 7.108 Housing is recognised as the Council’s top priority land-use (Policies CS6 and DP2). The proposed 166 new units will make an important contribution to Camden’s supply of housing, including affordable, on a vacant, underdeveloped site supporting the objectives of Camden Policies CS6 and DP2.
- 7.109 Whilst, Camden’s 2012 – 13 Annual Monitoring Report (“AMR”) sets out that the Council is currently on course to meets its long term housing supply targets, over the April 2012 – March 2013 period a net total of 545 self-contained homes were completed, which falls below the annualised London Plan housing target (665 homes). The proposals will make an important contribution to meeting these ambitious targets.
- 7.110 The proposed development will optimise the site’s housing capacity to make an important contribution to the Housing Trajectory, in accordance with London Plan Policy 3.4 and Camden Policy DP2. The density of the proposed development across the site is 398 units per hectare or 1,045 habitable rooms per hectare. Whilst London Plan Table 3.2 is only indicative and density should be determined by local setting and housing requirements, the proposals fall within the relevant density range.
- 7.111 In achieving an appropriate balance between housing requirements and responding to the site characteristics, the proposed development is in accordance with NPPF, London Plan and Camden policies. (A detailed assessment of the design response to the site’s surroundings is provided later in this Section).
- 7.112 The 166 new units are therefore considered to fully accord with the NPPF and strategic policies of the relevant Local Plans in regard to Housing. The proposals are assessed against the GLA and Camden’s affordable housing and development management policies and guidance below.

### Affordable Housing

#### Quantum

- 7.113 The proposed development will deliver 84 affordable units (51% of the total units). This equates to 50% on a GEA floorspace basis (8,574 sq m). The provision of on-site affordable will contribute towards the creation of mixed and balanced communities in accordance with London Plan Policy 3.9 and Camden Policies CS6 and DP3.

### Tenure Split

- 7.114 Table 7.1 provides a breakdown of the housing provision by tenure. In accordance with Camden’s Housing CPG2 this includes a split by net internal area (NIA).

**Table 7.1: Proposed Affordable Housing Provision**

	Private (sq m)	Affordable Rent (sq m)	Intermediate (sq m)
GEA <sup>1</sup>	8,574	5,116	3,346
GIA	7,821	4,672.5	3,072
NIA	5,859	3,423	2,320

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<b>Unit basis</b>	82	46	38
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1- Private and affordable rent GEA is inclusive of plant and concierge. Intermediate is inclusive of plant only.

7.115 In accordance with London Plan Policy 3.11, and Camden Policy CS6, 60% of the affordable housing is provided for affordable rent and 40% to be for intermediate (on an NIA floorspace basis).

### Location of Affordable Housing

7.116 The 84 affordable units will be provided across Blocks A, B and C. Residents of the affordable units will have access to the northern communal courtyard and the communal roof terrace above Blocks A and B. This is the preferred approach of the Registered Provider to facilitate management of the affordable housing and its associated facilities.

### Housing Mix

7.117 The proposed development provides a mix of large and small homes in accordance with Camden Policy DP5. The proposed mix is set out in Table 7.2 alongside the priorities of the three tenures as set out in Camden’s Dwelling Size Priority Table.

**Table 7.2: Proposed Dwelling Mix**

	PRIVATE	Dwelling Size Priority	AFFORDABLE RENT	Dwelling Size Priority	INTERMEDIATE	Dwelling Size Priority
Aim		50% large		10% large		40% 2-Bed
1 Bed	16 (20%)	Lower	11 (24%)	Medium	23 (61%)	Lower
2 Bed	60 (73%)	Medium	24 (52%)	High	15 (39%)	Very High
Family (3 Bed and 4 Bed)	6 (7%)	High	11 (24%)	High	0 (0%)	Medium
Total	82		46		38	

7.118 The proposed housing mix has been carefully informed through consultation with the Council’s Planning and Housing Officers and various registered providers. Camden’s Development Policy DP5 and supporting paragraphs acknowledges that:

*“in considering the mix of dwelling sizes regard will be had to:*

- *the character of the development, the site and the area, including impact of the mix on child density;*
- *Site size and any constraints on including homes of different sizes; and*
- *The economics and financial viability of the site, including the demand for homes of different sizes”.*

7.119 Furthermore, paragraph 5.6 of the supporting text to Policy DP5 acknowledges that it will not be appropriate for every development to meet the aims in the Priorities Table and where possible a mix of large and small homes should be included within each category of housing provided. This particular issue is further emphasised at paragraph 5.7 of the supporting text to the policy that states:



## 7.0 Planning Assessment

*“the Council will be flexible when assessing development against policy DP5 and in particular the aims of the Dwelling Size Priority Table”. (Para 5.7)*

- 7.120 The appropriateness for the application site to provide a large proportion of family sized units (both private and affordable) is constrained by the site’s layout and surrounding context. In particular, the site is surrounded by busy roads and is limited to the amount of amenity space that it is able to be provided on-site. From a management perspective, all the affordable family sized units are provided at ground level to ensure each unit has direct access to private garden areas. The provision of family sized units within the upper storeys of the scheme is not deemed to be ideal due to the lack of direct access to private gardens and the associated management implications.
- 7.121 Furthermore, the Canteloves Ward has one of the highest child density yields within the Borough. As such the proposed number of affordable family sized units is considered appropriate to ensure a balanced and sustainable mixed community and is supported through feedback provided from the registered providers. In their experience of schemes of a similar nature, increasing the quantum of affordable housing units, results in management issues that impacts on ensuring a balanced community.
- 7.122 The maximum quantum of family sized affordable units is also dependent upon the viability of the scheme. Policy DP5 (e) together with paragraph 5.15 acknowledges this and indicates that the value of affordable housing will depend upon its size with lower values per square metre than smaller units and that the rigid application of dwelling size priorities can prejudice financial viability. Paragraph 5.16 goes on to advise that market and intermediate affordable housing will often be too expensive for many households who need large homes and that these affordability issues also need to be taken into account when considering the appropriate mix for specific schemes.
- 7.123 The Policy DP3 requirement to deliver 50% affordable housing (GEA) impacts upon viability. This in turn impacts upon the overall mix of units that the scheme can feasibly deliver that meets the Council’s affordability thresholds.
- 7.124 The overall proposed affordable mix of unit sizes is considered to form the optimum mix that will provide for a sustainable and balanced community, whilst ensuring the Council’s affordability thresholds are met and overall development viability is achieved. The proposed mix is therefore entirely appropriate when having regard to criteria (a) to (e) of Policy DP5, the relevant supporting text and supplementary guidance provided within CPG2 (including the amendments).

### Quality of New Accommodation

#### Unit Sizes

- 7.125 All units have been designed to meet and exceed the London Plan (Policy 3.5) and the standards set out within Mayor’s Housing SPG in respect to minimum unit sizes and Lifetime Homes requirements. The standards in the GLA guidance exceed Camden’s own Planning Guidance.
- 7.126 The plans submitted with this application illustrate the proposed layout of each unit type, having regard to Lifetime Homes requirements. They show that each of the proposed flat types meet the relevant policy requirements and fulfil the Lifetime Home requirements.
- 7.127 Having regard to the relevant standards set out with both the Mayor’s Housing SPG and Camden’s CPG2, the sizes of the proposed units meet policy requirements.

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### Outlook and Aspect

- 7.128 129 of the 166 units benefit from dual aspect, equating to 78% of units.
- 7.129 The single aspect units are almost all one bed-room units and only five are north-facing in accordance with the Mayor's Housing SPG guidelines.
- 7.130 The proposed layout of the scheme has been evolved to optimise units numbers, whilst ensuring the very highest standards of design. Whilst there will be a number of units that remain single aspect north facing units, this is a reflection of the relatively constrained nature of the site which needs to be balanced against the high proportion of dual aspect units (78%) that the scheme provides.

### Privacy

- 7.131 The courtyard dimensions (18 x 18 metres) have been robustly tested with LB Camden and GLA Officers, detailed analysis of the privacy treatment is provided in the Design and Access Statement.
- 7.132 Consideration has also been given to the privacy and overlooking with surrounding existing properties. The closest neighbouring residential premises are located along Rochester Place, where the direct distance from balcony to gable wall of the adjacent mews dwellings is 6.5m. Whilst the distance between the properties is narrow, this is not uncharacteristic of urban areas with a tight contextual grain such as that in the immediate surrounds. In addition the proposed north-east elevation will face the gable ends of the existing properties, whereby there will not be any direct facing windows.
- 7.133 A series of exercises were carried out with respect to the location of the new windows along Rochester Place with greater details set out in the Design and Access Statement.

### Sunlight and Daylight

- 7.134 An Internal Sunlight and Daylight Report accompanies the planning submission to assess the internal sunlight and daylight amenity within the proposed development.
- 7.135 86% of all proposed rooms tested achieving the levels of average daylight factor ("ADF") recommended by BRE. The rooms falling short are generally located on the lowest floors and the design optimisation has sought to ensure that even those units with level of daylight recommended by the BRE are still day lit to an acceptable level.
- 7.136 The sunlight assessments undertaken demonstrate that the levels of annual probable sunlight hours ("APSH") to generally be excellent. Only the lower floors of the two courtyards see lower levels of APSH than recommended by BRE. The design has responded by situating living rooms on external facades wherever possible.
- 7.137 Accordingly, the Internal Daylight Sunlight assessment concludes that the proposed development will provide residential accommodation considered acceptable in terms of daylight, sunlight and overshadowing considering the high density nature of the design and the surrounding context.

### Lifetime Homes

- 7.138 All residential units will meet Lifetime Homes Requirements and 10% of units will meet wheelchair housing requirements to be easily adapted to achieve them (in accordance with Camden Policy DP6).

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### AMENITY

#### Private Amenity Space

- 7.139 Every unit is provided with private amenity space in the form of a garden, balcony or terraces. This private amenity space equates to 1,950 sq m.
- 7.140 The duplex units are provided with private gardens which face onto the lower ground communal courtyards. These are proposed to be buffered from the courtyards by planting. The units on the middle floors along St Pancras Way and Camden Road are provided with recessed balconies, whilst those along Rochester Place and the north-west elevation are partly recessed and partly projecting. All balconies have a depth of not less than 1.5 metres. On the upper floors, units are provided with private roof terraces. The provision of private amenity is therefore considered to fully accord with guidance contained in the GLA and Camden's Housing SPGs.

#### Communal Amenity Space

- 7.141 All dwellings have direct access to the communal amenity space provided. 844 sq m of communal amenity space is provided in the form of two lower ground courtyards and two communal roof-top terraces.
- 7.142 The two courtyards are overshadowed for the majority of the time as detailed within the Internal Daylight and Sunlight Report. Consequently two additional large areas of communal amenity space are provided at roof level, which will enjoy excellent levels of sunlight, well in excess of the minima recommended by the BRE.
- 7.143 In addition, there are improvements to the public realm surrounding the site on the three road frontages. This is assessed under the Urban Design Section.

#### Open Space

- 7.144 Moreover, the site benefits from close proximity to a number of areas of public open space, including Rochester Park Terrace Gardens approximately 300 metres from the site. Accordingly it is considered, that the on-site provision, coupled with provision within vicinity of the site will provide sufficient open space to new residents of the development in accordance with Camden Policy CS15.

#### Children's Playspace

- 7.145 The rooftop communal terraces incorporate 110 sq m of dedicated doorstep playspace for 0 – 5 year olds, in addition to flexible lawn areas for all age groups, in accordance with GLA standards.
- 7.146 The play areas include boulders, stepping stones and balance rocks to allow for creative play. The lawns provide a venue for informal games.

#### Summary

- 7.147 The proposed new 167 units will make an important contribution to Camden's supply of affordable and market housing contribute to London and Camden's ambitious housing supply targets (London Plan Policy 3.3 and CS Policy CS1, CS6 and DP2) and the NPPF's objective to meet the housing needs of an area (Para 17). Moreover, it is considered the residential proposals accord with the relevant policies of Camden's Development

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Management Document and guidance within the GLA’s and Camden’s respective Housing SPGs.

### URBAN DESIGN

- 7.148 The design of the proposals have been carefully informed through an extensive programme of pre-application engagement with LB Camden’s Planning and Design and Conservation Officers and surrounding key stakeholders, including representatives from the surrounding Conservation Area Advisory Committees and Neighbourhood Forums (as detailed in Section 5 of this Statement) in accordance with Paragraph 66 of the NPPF should be treated favourably.
- 7.149 As part of this evolution in design, Sheppard Robson were appointed in June 2013 to review and revisit the design concept provided by the previous architects. The Design and Access Statement, Townscape and Visual Impact Assessment and Heritage Statement that accompany the application provides a full explanation of the design, its evolution and response to the local context and character.
- 7.150 The Townscape and Visual Impact Assessment assesses the proposed development against the By Design “objectives of urban design” concluding that it will contribute positively to each of the seven objectives. Nevertheless for completeness, the development is assessed against the London Plan and Camden’s own design policies below.

### Overall Form

- 7.151 In accordance with London Plan Policy 7.6 and Camden’s Policy DP24 the height scale and massing and the detailed design of the proposed development will make a positive contribution to the public realm, streetscape and wider streetscape and appropriately respond to the character, setting, context and the form of neighbouring buildings. In particular:
  - Form:
    - The overall concept was fundamentally revisited in April 2013. The new concept allowed for the redistribution of height and massing from a “spine” centre of the site to a perimeter block approach, that sought to emphasise the crossroads junction and steps down to the 102 St Pancras Way and Rochester Place;
    - Through the design evolution the overall massing of the building was reduced to a five storey parapet along St Pancras Road and Camden Road, with two additional set-back floors to Camden Road and one to St Pancras Road. The heights respond appropriately to the post-war residential estates to the south-east and south-west;
    - The massing was further reduced along Rochester Place and at the north-west boundary with No. 102 St Pancras Way to respond to the surrounding lower townscape. The parapet line was dropped to four storeys, with set back floors roughly in the same location as the tallest elements of the existing building.
  - Character:
    - The proposed development will contribute significantly to the quality of the street frontages and local area, enhancing the prevailing residential character of the area;

## 7.0 Planning Assessment

- The ground floor provides the upper level of duplex units which are set back behind lightwells to the street frontages. Front doors will be provided at grade via bridge links from the street, to the ground and lower ground duplex units. As well as contributing to the residential character the lightwells are characteristics of the 19<sup>th</sup> century terraces found in the surrounding Conservation Areas;
- The elevations above also have a distinctly residential grain, whilst contextually responding to the different contexts to the Camden Road and St Pancras Way compared to Rochester Place and 102 St Pancras Way (see below for further commentary on response to context);
- **Setting:**
  - The proposed development will provide a strong built edge to the Camden Road and St Pancras junction, which is not offered by the set-back post-war housing estates at the junction’s other corners;
  - The Townscape and Visual Impact Assessment and Heritage Statement assesses the impact of the proposed development on surrounding views to and from the four surrounding Conservation Areas and conclude that the proposed development will enhance local views where visible through providing clear urban quality at the junction;
  - Further assessment against relevant heritage policies is provided in the Heritage Section below.
- **Context:**
  - Whilst all the elevations follow a clear order and hierarchy, the detailed design of the elevations responds to the different context of the surrounding buildings, roads and natural topography;
  - Camden Road and St Pancras Way elevations are treated as the principal elevations and are of a more formal appearance.
  - Rochester Mews and the north-west elevation are treated as secondary. The balconies are part recessed and part projecting, with metal railing balustrades to give a more “Mews” feel;
  - The ground floor openings to St Pancras Way are taller than those to Rochester Place, reflecting the slope across the site;

### Materials

- 7.152 The proposed development will use high quality materials in accordance with Policy DP24(d). The material palette seeks to draw on surrounding buildings.
- 7.153 The use of bricks for the lower storeys reflects the residential character of the scheme and draws on the post-war apartment blocks adjacent to the site as well as homes in the surrounding area. The main dormers on the set-back storeys are clad in Corten metal to add a contemporary feel and further richness to the facades. A lighter brick has been selected for the courtyards to allow light to bounce around.
- 7.154 All the materials have been selected for their visual attractiveness and physical durability to ensure a sustainable construction in accordance with Camden Policy DP22.

### Landscaping and Amenities

## 7.0 Planning Assessment

- 7.155 The proposed development seeks to retain existing nature features surrounding the site through the retention of most of the trees on the site in accordance with DP24(f). Whilst the large mature tree on St Pancras Way is required to be removed for aboriginal reasons, it is proposed to be replaced by a mature tree of equal townscape value. The semi-mature trees along Camden Road will be retained.
- 7.156 The proposals include new planting beds along the lightwell railings to St Pancras Way and Camden Road, and cover planting below the trees to Camden Road to provide appropriate boundary treatments in accordance with DP24(g).
- 7.157 Amenity space within the scheme will be provided in the form of private and communal amenity space as part of the high quality design (Policy DP24(h)). The two courtyards are provided at lower ground level, surrounded by private gardens for the duplex units that will provide high quality amenity space that will be shielded from the external environment and provide a sense of community. Further communal amenity space is provided through roof terraces benefitting from excellent levels of sunlight and daylight and providing recreation and playspace (See below for a further assessment of the quantum of amenity space against relevant residential standards).

### Accessibility

- 7.158 In accordance with Camden Policy DP29, the proposed development achieves the highest levels of inclusive design.
- 7.159 The Access and Inclusivity Statement, which forms part of the package of application documents, provides details of the wheelchair adaptable units and other measures incorporated into the scheme design to ensure full compliance with access and inclusivity requirements.
- 7.160 As above referenced all of the residential units will meet Lifetime Homes Requirements in accordance with DP6.

### Building Services Equipment

- 7.161 The majority of building services equipment will be contained within the building envelope on the lower ground floor. The CHP unit and water tank have been located in the lower ground floor.
- 7.162 The associated equipment for the CHP runs up Core D with the flue rising near the highest element of the building to avoid impact on views of the proposed development.
- 7.163 There is no roof top plant except for PV panels, the boiler flue and the lift overruns.

### Summary

- 7.164 In sum, the proposed new building has been designed to enhance the character and legibility in the neighbourhood that it sits (in accordance with London Plan Policy 7.1).
- 7.165 The new building will be of the highest quality design and represents a considerable improvement on the buildings it replaces, in particular fronting Camden Road. It will create a sense of place at the junction of the busy Camden Road and St Pancras Way, enhancing the quality of the townscape in the area whilst creating a distinctive character to the site which recognises and responds appropriate to the different character of its secondary principal frontages.

### HERITAGE

## 7.0 Planning Assessment

- 7.166 The application site falls outside of any Conservation Area, however, it located in close proximity (approximately 50 metres) to the edge of four Conservation Areas.
- 7.167 None of the buildings are statutory or locally listed. At the time this Statement was produced, the Council had published the draft Local List (October 2013), within which none of the existing buildings had been included.
- 7.168 As part of the pre-application discussions a Heritage Appraisal (April 2013) was submitted assessing the heritage significance of the existing buildings on the site against Camden’s adopted Selection Criteria for Local Listing. This concluded that:
- There are no indications that 86 – 100 St Pancras Way is a building of heritage significance or notable architectural interest;
  - There are no indications from English Heritage’s criteria applicable to local listing to conclude that 86 – 100 St Pancras Way is a building that would warrant local listing;
  - Neither does the building satisfy LB Camden’s Selection Criteria for inclusion on the local list.
  - There is no compelling evidence base or reasonable cause for locally listing the building.
- 7.169 Notwithstanding this, a Heritage Statement accompanies the planning submission to assess the significance of the buildings on the site as non-designated heritage assets and the designated heritage assets in vicinity of the site in accordance with NPPF Paragraph 128, to a proportionate level of detail.
- 7.170 This assessment reveals that the heritage significance to be attached to the existing buildings on the site is at best slight. Paragraph 135 of the NPPF sets out that a balanced judgement should be taken in having regard to the scale of any harm or loss and the significance of the non-designated heritage asset. The small loss of heritage significance is considered to be outweighed by the significant number of public benefits which the proposals will offer, including:
- Provision of 166 new homes of varying types and sizes, including 85 affordable units, which will go to meeting the demand for housing in locality;
  - Optimisation of a vacant site;
  - A high quality new development which will improve the streetscene and surrounding townscape;
  - Enhancements to the public realm; and
  - Financial contributions to be secured through the Section 106 and Mayoral CIL.
- 7.171 In accordance with Paragraph 129 of the NPPF, the affect of the proposals on the significance of the four conservation areas and listed buildings in proximity to the site have been assessed. The Heritage Statement concludes that the proposed development will not result in any harm to these surrounding designated heritage assets. Moreover, the proposals are considered to result in a slight positive effect to the Camden Broadway Conservation Area through adding visual interest and distinctiveness to a presently rather lacklustre and undistinguished townscape.
- 7.172 The proposed development is also considered to accord with Camden’s Policy DP25 in maintain the character of the surrounding Conservation Areas and also, where possible, preserving trees which contribute to views from the surrounding CAs.

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### NEIGHBOURING AMENITY

7.173 The proposed development has been considered with respect to any impacts on surrounding occupiers, in particular the residential amenities of neighbouring properties, to ensure adequate protection to their visual privacy, outlook, daylight and sunlight in accordance with Camden Policy DP26.

#### Sunlight and Daylight

7.174 An External Sunlight and Daylight Report has been prepared to assess the implications of sunlight and daylight on surrounding properties and forms part of this submission. In accordance with Camden Policy DP26 and BRE's Site Layout Planning for Daylight and Sunlight (2011) this assesses all residential properties that will be affected by the development in sunlight and daylight terms.

7.175 This sets out that there are some minor impacts to the surrounding properties including 26 – 28 Rochester Place, 1 – 24 Hogarth Court.

7.176 There are some more impacts to 1 – 40 St Pancras Way, however 72% of windows retain good levels of light above 20% VSC. Only 7 windows lose over 30% of VSC, however, this is not considered unusual given the dense urban location. Moreover, these windows will experience a loss of daylight in the existing situation due to tree foliage.

#### Privacy and Outlook

7.177 The nearest residential properties to the site are the properties on the opposite of Rochester Place. These are 6.5 m metres from the site. Moreover, there are no windows located on the flank elevations of properties fronting onto Rochester Place. Thus, no direct overlooking into the buildings will occur. In terms of views of the private gardens, the proposed development will overlook the gardens of these properties, given the low height of perimeter fencing and thus will not present a situation different from what currently exists.

7.178 It is considered that the neighbouring properties, across St Pancras Way and Camden Road, are of sufficient distance to not be impacted by the proposed development in regard to privacy and outlook.

### CRIME PREVENTION THROUGH DESIGN

7.179 The proposed development includes measures to improve community safety and promote safer streets and public spaces in accordance with Policy CS17.

7.180 The applicant's Design Team have met with Camden's Crime Prevention Design Advisor who advised on the principles of "Secured by Design" and "Designing Out Crime". The Design and Access Statement details the measures which have been incorporated in response to issues raised.

### TRANSPORT, ACCESSIBILITY AND PARKING

#### Location and Transport Impact of the Proposals

7.181 It has already been demonstrated that the site represents an appropriate location for residential development, by virtue of its proximity to essential education, health and community facilities, employment and retail centres and its excellent transport links (PTAL



## 7.0 Planning Assessment

- 6a). In accordance with London Plan Policy 6.1 and DP16 it will reduce the need for its future residents to travel.
- 7.182 The destinations reached via public transport are significant as outlined in Section 2 of this Statement. The proposed development will therefore be supported by excellent public transport links in accordance with London Plan Policy 6.1 and Camden Policies DP16 and DP17.
- 7.183 In accordance with London Plan Policy 6.3 and Camden Policy DP16 the impact of the proposals on transport capacity are assessed in the Transport Assessment which accompanies the planning application submission. This concludes that:
- The site's location and accessibility ensures residents are not reliant on travel by car; and
  - The proposed change of use would result in a reduction in potential peak hour trips for all modes of transport.
- 7.184 A draft Travel Plan accompanies the planning submission and includes a number of management strategies and measures to promote the most sustainable forms of travel, walking and cycling.

### Pedestrian, Cycling and Environmental Improvements

- 7.185 The site benefits from St Pancras Way along the site frontage being classified as a 'route signed or marked for use by cyclists on mixture of quiet or busier roads'. There is a one metre wide advisory cycle lane adjacent to the kerbside and an advanced cycle stop lane installed at the St Pancras Way / Camden Road junction. It is therefore considered that the development is supported by adequate cycling links in accordance with London Plan Policy 6.9.
- 7.186 The proposed cycle parking provision exceeds the requirements of both LB Camden's and GLA cycle parking standards (see below for Assessment against standards), encouraging cycling as a mode of transport for future residents.
- 7.187 The proposed building footprint delivers increased footway widths on both the St. Pancras Way and Rochester Place site frontages to facilitate pedestrian movement around the site in accordance with London Plan Policy 6.10 and Camden Policy DP17.
- 7.188 The proposals will deliver a consistent building line along the Camden Road frontage that will require a subsequent stopping up order pursuant to Section 247 of the Town and Country Planning Act.

### Car Parking (including disabled)

- 7.189 The proposed development will be car free, with the exception of two disabled parking bays on the site, and will be secured by a Section 106. This is considered entirely appropriate given the site's location and its PTAL level of 6a.
- 7.190 The existing 15 car parking spaces will be removed as part of the redevelopment proposals, encouraging car free lifestyles, promoting sustainable ways of travelling and helping to reduce the potential impact of traffic in accordance with Camden policies CS11 and DP18 and DP19.
- 7.191 The removal of the car parking spaces promotes alternative, more sustainable forms of transport and allows for residential density to be optimised in the redevelopment proposals, in accordance with Camden Policies CS11 and DP18.

## 7.0 Planning Assessment

7.192 It is proposed to provide two disabled parking spaces on the site. The Transport Assessment provides full details of the parking beat survey that has been undertaken on the immediate road network that falls within the adjacent CPZ, which assessed that there was reserve capacity to accommodate additional on-street demand by blue badge holders. This approach accords with the provisions of Camden's DP18.

### Cycle Provision

7.193 296 secure, accessible and sheltered cycle parking spaces will be provided. This exceeds the requirements of the London Plan (Policy 6.9 and Table 6.3) and Camden's LDF.

7.194 Cycle stores are provided within each core, so that the provision reflects the accommodation schedule of each block. The stores are located at lower ground floor level with access achieved via a lift.

### Waste, recycling and servicing

#### Waste and Recycling Provision

7.195 Cores C, D, E and F will be provided with a dedicated bin store, with a combined bin store provided for Blocks A and B. These will provide a total of 33 x 1,100 L and 12 x 500 L Euro Bins being provided across the site, with separate bins provided for mixed dry recyclables, organic food waste and residual waste to enable the amount of materials which can be sent for recycling to be maximised.

7.196 The proposed provision for storage of waste and recycling accords with the standards set out in Camden's CPG1, including allocation for an eight day storage provision (full details of the methodology can be found in the Waste and Recycling Strategy accompanying this submission).

7.197 In accordance with the guidance in CPG1, dedicated spaces have been provided for the storage of discarded bulky waste items.

#### Servicing and Collection

7.198 Waste servicing will take place on-street for Cores A – E, whilst the internal management team will be responsible for transferring waste from Core F to the dedicated temporary holding area located outside Block B.

7.199 As advised by CPG1, the applicant has consulted with LB Camden Street Environment Services to agree the best means of storage and collection. Advice has also been sought from TfL and regard to comments raised during consultation.

7.200 In particular, as a response to consultation comments, the amount of servicing to take place from Rochester Place has been reduced, whilst continuing to ensure compliance with the relevant guidance in regard to collection distances. Core A will now be serviced from St Pancras Way. It is however proposed to continue to service Cores D and E from Rochester Mews and the Transport Assessment, which accompanies this application, demonstrates that on-street refuse collection is not considered likely to cause significant inconvenience to existing road users.

### Construction Access

7.201 A draft Construction Management Plan (CMP) accompanies this planning application submission in accordance with Camden Policy DP20 and DP26. This identifies mitigation

## 7.0 Planning Assessment

measures to minimise disruption for local communities through effective management of the construction process.

- 7.202 To ensure that the intentions of the CMP are carried out successfully emphasis will be placed on clear definition and understanding of the requirements and responsibilities of the Project Team staff. Regular communication with LB Camden and local residents will also take place where any concerns may be addressed and updates given.
- 7.203 The draft CMP will be finalised with LB Camden, and other organisations as appropriate, prior to the commencement of construction activities and will be secured through the Section 106.

### ENERGY AND SUSTAINABILITY

- 7.204 The proposed development seeks to make the fullest contribution to the mitigation and adaptation to climate change in accordance with London Plan policies 5.1 and Camden Policy CS13 and DP22.
- 7.205 The proposed development seeks to adhere to the Mayor's energy hierarchy, 'Be Lean, Be Clean and Be Green' in order to minimise carbon dioxide emissions through improvements over the Target Emission Rate (TER) outlined in the 2010 Building Regulations (Policy 5.2). Whilst the minimum reduction seeks an improvement of 25% (policy 5.2) the proposed scheme exceeds policy requirement by achieving an improvement of 40.73% reductions on carbon emissions through both passive and renewable means.

#### Code for Sustainable Homes

- 7.206 Code for Sustainable Homes Level 4 (applicable for new build between 2010-2013) will be applied for all blocks (A-F) in accordance with Camden's Policy DP22 and the London Plan policy 5.2. In accordance with the guidance for the Code for Sustainable Homes the greatest possible carbon reductions using passive measures was applied to the proposed scheme before renewable percentages were considered.

#### Energy

- 7.207 The incorporation of both passive energy-efficient and renewable solutions has enabled the development to exceed policy requirements by providing a reduction of 40.73% in carbon emissions. The Energy Statement accompanying this planning application gives a detailed account of the renewable measures that were considered in the preparation of the overall energy strategy for the site which utilises an onsite Combined Heat and Power (CHP) engine and PV cells.
- 7.208 A suitably sized CHP engine at 70kWe will utilise the base heat demand of the scheme to provide an appropriate level of onsite energy (London Plan policy 5.6/ Camden policy CS13). One of the key advantages to running a CHP engine is that it produces electricity, which can displace grid-supplied electricity, having significant carbon savings. The CHP will be located to the north-east of the site at lower ground floor level and will have a dedicated flue, rising 2m above the highest point of the development, to extract exhausts.
- 7.209 The uplift in carbon savings required to achieve Code for Sustainable Homes Level 4 cannot be met by the sole use of a CHP and so the inclusion of PV cells was required. 52 panels of PV cells will be located on the roof terrace at sixth floor level (Block B), providing 13kWp of renewable energy. The combination of the CHP and the PV cells array are an ideal solution for the scale of the proposed residential development proving easy to monitor and maintain.

## 7.0 Planning Assessment

### Brown Roofs

- 7.210 London Plan policy 5.11 and Camden policy DP22 promote the incorporation of brown/green roofs where possible to encourage biodiversity and sustainability within any new development. The seventh floor roof terraces (Block C/E) will provide 500 sq m of brown roof which will assist in the reduction of surface water run-off generated and enhance the biodiversity of the site as it matures.

### TREES, ECOLOGY AND BIODIVERSITY

- 7.211 The proposed development seeks to retain, protect and enhance biodiversity on the site, including the existing trees, in accordance with Camden Policy CS15. An Arboricultural Report and Phase 1 Habitat Survey accompany the planning application submission to assess the existing arboricultural and ecological features of the site. The Arboricultural Report, Landscape Drawings and Landscape Section of the Design and Access Statement provide full details of trees to be retained and the ecological enhancements provided by the proposals.

### Trees

- 7.212 The design of the proposed development has had regard to retaining and protecting the majority of the existing trees surrounding the site. No trees within the site are covered by Tree Preservation Orders.
- 7.213 A total of seven trees will require removal as part of the development (six of which are either Category C or U). The Arboricultural Report identifies that the existing large London Plane tree at the site's western boundary along St Pancras Way is required to be removed for arboricultural reasons. It's proposed removal and replacement has been agreed in principle with LB Camden's Tree Officer.

### Ecology and Biodiversity

- 7.214 The existing site is comprised of predominately hard-standing. An extended Phase 1 Habitat Survey, accompanying this planning application, has been undertaken to identify those ecological features of the site and surrounds which could be impacted as a result of the proposed development. This sets out that:
- The overall ecological value of the habitats present on the site is low, with the areas of ephemeral vegetation supporting common and widespread plant species;
  - The scattered trees and buildings support common nesting bird species during the spring and summer;
  - The features of the building were assessed to either have negligible or low potential to support bats;
  - None of the trees present on or adjacent to the site contained cavities deemed as suitable to be used as a roost by bats.
- 7.215 The proposed new courtyards and communal roof terraces will provide opportunities to improve the site and surrounding area's ecological value. The plant species will be chosen for their hardiness and drought tolerance.

## 7.0 Planning Assessment

7.216 Full details of the proposed landscaping are set out on the landscaping plans and the Landscape Section of the DAS, but include:

- Within the courtyard:
  - Tall trees in the centre of each courtyard;
  - Smaller ornamental species to be located around the seating areas in each courtyard; and
  - Evergreen hedges, also providing screening to the lower ground private gardens.
- At roof terrace level:
  - Drought and sunlight favoring plants in raised planters;
  - Plants to include small trees and large shrubs (for example Birch, Dwarf Willow, and grasses, lavender and silver leaved perennials);
  - Encouraged use of planters for allotment space.
- 500 sq m of brown roof on the remaining roof spaces;
- Provision of bird nesting and invertebrate boxes.

7.217 In accordance with the requirements of the NPPF and Camden Policy CS15 the proposals would provide a net gain for biodiversity in the local area.

### BASEMENT AND LIGHTWELLS

7.218 A Basement Impact Assessment (BIA) accompanies the planning submission in accordance with Camden Policy DP27, DP31 and the additional guidance set out within CPG4.

7.219 In accordance with CPG4, the BIA addresses the screening, scoping and impact assessment processes of CPG4 (Stages 1 - 4). It concludes that the proposed development would not have a detrimental impact on the groundwater, surface water or increase possibility of flooding at the site.

7.220 Whilst the construction of the basement will generate a minor degree of ground movements due to a variety of works carried out, calculations have indicated that these will give rise to negligible damages for the adjacent properties. During construction the most sensitive location will be along the neighbouring northern boundary where it is recommended that an appropriate monitoring regime is applied to avoid any risk and potential damage.

7.221 Lightwells will feature as an aesthetical and functional aspect of the proposed ground and lower ground floor duplexes whereby the same principles of CPG4 will be applicable during construction. Although the lightwells will not sit within the enclosed building envelope they are a sub-element of the overall basement perimeter wall, thus construction procedures set out in the BIA pertain to the lightwells as well.

### FLOOD RISK AND SUSTAINABLE URBAN DRAINAGE

#### Flood Risk

7.222 The site is situated in Flood Risk Zone 1 and under a hectare in size and thus a Flood Risk Assessment is not required. The Environment Agency have however advised that surface water runoff could be a flood risk issue at the site. Accordingly a Surface Water Drainage

## 7.0 Planning Assessment

Statement (“SWDS”) accompanies the planning submission and outlines the ways in which surface water flooding from the development will be mitigated against.

### Sustainable Urban Drainage

- 7.223 In accordance with London Plan Policy 5.13, the proposed development will incorporate sustainable urban drainage and will achieve greenfield run-off rates to ensure that surface water run-off managed. To achieve this, the proposed development will:
- Incorporate 500 sq m of brown roof; and
  - Incorporate approximately 270 sq m of storage under the northern lower ground floor courtyard.
- 7.224 The proposed development is therefore considered to accord with Section 10 of the NPPF and the relevant London Plan and Camden policies (DP23) in respect to mitigating surface water flood risk.

## NOISE, AIR QUALITY AND CONTAMINATED LAND

### Noise

- 7.225 In accordance with Policy DP28 and Camden’s CPG6 (Amenity), the issue of noise has been carefully considered in the design of the proposed scheme. In particular, regard has been had to the daytime, evening and noise period levels across the site which are dominated by traffic noise from Camden Road and St Pancras Way.
- 7.226 The Noise Report sets out that mitigation procedures will be required to meet internal noise requirements as a result of the prominent noise levels from this traffic. It is considered that through the installation of appropriate glazing and ventilation systems this will be achieved inside the building.
- 7.227 In addition, the Noise Report sets out the mitigation treatment and careful consideration of plant design required to ensure compliance with relevant noise planning policies and regulations.

### Air Quality

- 7.228 In accordance with Camden Policy DP32 an Air Quality Report accompanies the planning submission. This assesses the existing air quality at the site, the potential impacts of construction and the mitigation required to ensure suitable standards for future residents of the development.
- 7.229 It concludes that:
- The impact of the proposed development would have an overall negligible effect on surrounding receptors;
  - With the implementation of mitigation (the use of extract ventilation) the proposed development will comply with standards in respect to air quality.

## PLANNING OBLIGATIONS

- 7.230 The proposals include a package of planning obligations that will be secured through a Section 106 / 278 Agreement. These obligations will secure the necessary infrastructure improvements to meet the needs of prospective residents and should indirectly benefit the

## 7.0 Planning Assessment

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existing local community. In identifying the level and scope of planning obligations to be secured, the Council's supplementary planning guidance has been followed

7.231 A summary of the Heads of Terms that will be secured through the S.106 Agreement is set out below.

### Section 106 Heads to Terms

- On-Site Affordable Housing;
- 10% Wheelchair Adaptable Housing;
- Education Financial Contribution;
- Community Facilities Financial Contribution;
- Highways Financial Contribution;
- Pedestrian, Public Realm and Environmental Improvements ;
- Highways Works (through Section 278);
- Servicing Management Plan;
- Green Travel Plan;
- Construction Management Plan;
- Employment and Training;
- Local Procurement;
- Energy Strategy;
- Sustainability Plan; and
- S.106 Monitoring.





## 8.0 Conclusions

- 8.1 This Planning Statement has assessed the proposed development against National Planning Policy Framework (NPPF), the London Plan, Camden’s Local Development Framework, the Mayor and Camden’s Supplementary Planning Guidance and additional evidence based material.
- 8.2 It sets out how the applicants have responded to the extensive pre-application discussions and consultation held between January and November 2013 with LB Camden Officers and other key stakeholders, including a number of Neighbourhood Forums and Residential Associations and representatives from the four surrounding conservation areas as set out in section 5 of this Report.
- 8.3 The Planning Statement and accompanying planning application documents demonstrate the wide-ranging benefits of the proposed development and that it substantially accords with planning policy and guidance. In particular, the proposals will;
  - Redevelop a vacant accessible London brown-field site and bringing it back into active use. The proposals will optimise the use of the site having regard to the area’s history, character and constraints of the site and nearby conservation areas;
  - Deliver 166 new resident units (of which over 50% of the units will be affordable), across a mix of private and affordable tenures and unit sizes appropriate to the needs and setting of the area, contributing to London and Camden’s ambitious housing supply targets;
  - Create a high quality development that respects the prevailing pattern, density and scale of the surrounding built form, including the surrounding heritage assets, whilst remaining respectful to existing rhythms, symmetries and uniformities in the townscape;
  - Produce aesthetically pleasing external facades of high quality design, utilising a range of materials that both feature in the surrounding material palette whilst also offering a degree of uniqueness and interest adding to the vitality of the streetscape. The chosen materials are sustainable and environmentally friendly with robust properties that will wear and weather appropriate to the setting;
  - Create high quality amenity spaces that are comfortable, safe and accessible for residential occupiers. The outdoor amenity spaces are provided across a number of different levels incorporating the courtyards at lower ground level and the roof top terraces alongside the private amenity space that each unit will enjoy;
  - Provide attractive external spaces with a good relationship to internal spaces and offering appropriate security and a variety of different settings;
  - Enhance the ecological value of the site;
  - Incorporate principles of sustainable design and construction and energy, water and waste reduction measures; and
  - Minimise vehicular impacts upon local roads through a ‘car-free’ scheme, including Rochester Place and St Pancras Way.
- 8.4 In conclusion, the proposed development substantially accords with the aims and objectives of the NPPF, in particular paragraphs 22, 37 and 51 and the relevant LB Camden Local Development Framework policies and other material considerations.
- 8.5 In line with the Presumption in Favour of Sustainable Development and having presented a complying case for the proposed redevelopment of a residential-led development, the application should be approved without delay.



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# APPENDICES

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# Appendix 1 – Previous Floorplans (associated with Planning History)

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1991 Application Ref: 4100126

Office  
Ancillary  
Circulation

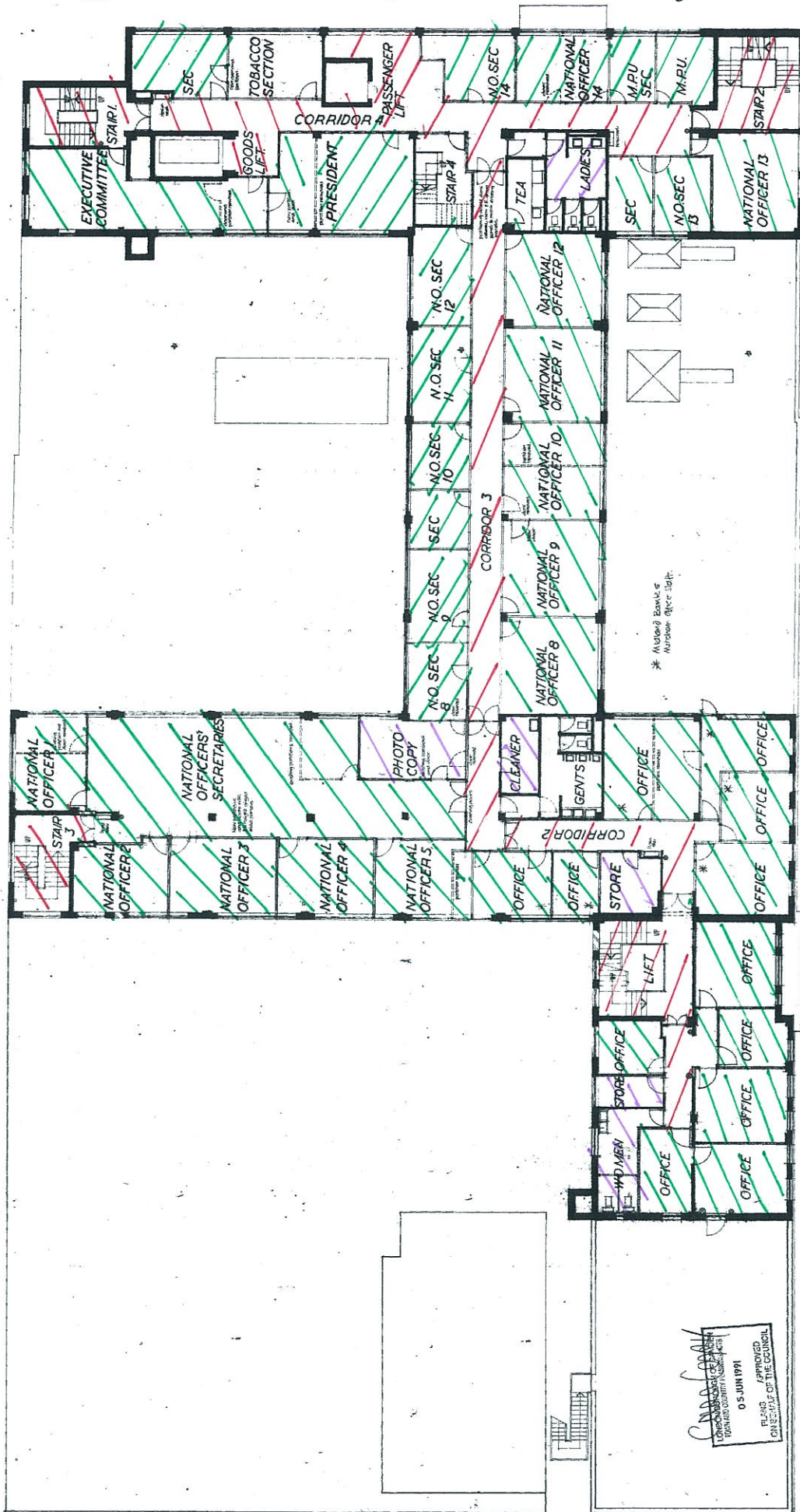


Notes:  
1. All new partitions to be half hour fire resisting construction  
2. All new partitions to be fire resisting construction  
3. All new doors to be fire resisting construction  
4. All new windows to be fire resisting construction  
5. All new windows to be fire resisting construction  
6. All new windows to be fire resisting construction  
7. All new windows to be fire resisting construction  
8. All new windows to be fire resisting construction  
9. All new windows to be fire resisting construction  
10. All new windows to be fire resisting construction

1. Fire alarm call points (circled)  
2. Fire extinguishers  
3. Fire alarm control panel

TP9100126  
05 JUN 1991  
PLANNING APPROVED  
ON BEHALF OF THE COUNCIL

86-100 ST. PANCRAS WAY, 79 CAMDEN ROAD NW.1  
Third Floor 1:100

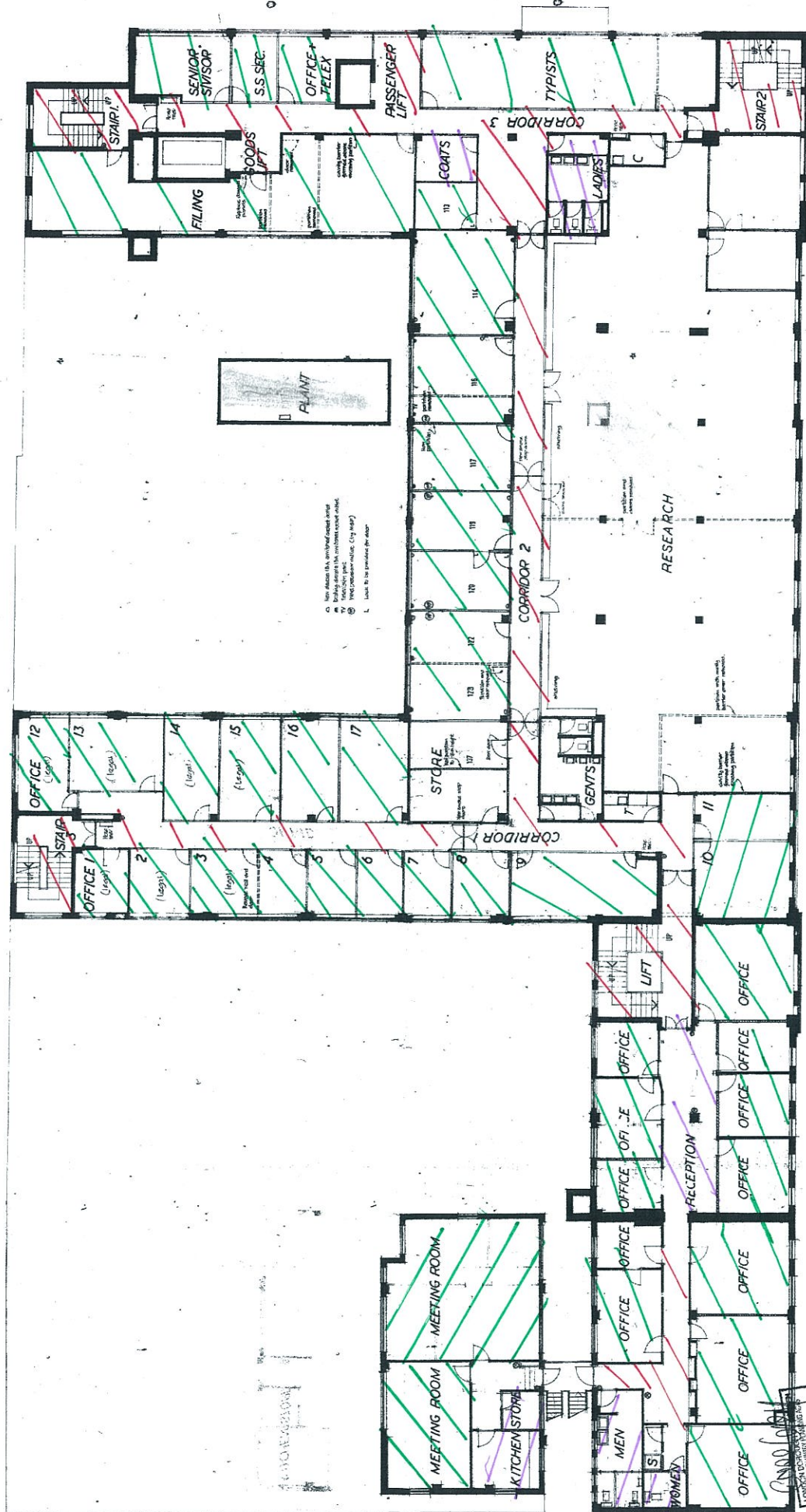


APPROVED  
 05 JUN 1991  
 PLANS OF THE COUNCIL  
 TOWN AND COUNTRY DEVELOPMENT

89100126

**86-100 ST. PANCRAS WAY 79 CAMDEN ROAD NW.1**  
**Second Floor 1:100**

Note: All work packages to be half hour fire resisting construction.  
 All work packages to be mobile partition.  
 All work packages to be half hour fire resisting construction.  
 Note: The building is to be a single storey office building.  
 Note: The building is to be a single storey office building.  
 Note: The building is to be a single storey office building.  
 Note: The building is to be a single storey office building.



Note:  
 All new partitions to be half hour fire resisting construction  
 All new partitions to be half hour fire resisting construction  
 All new doors to be half hour fire resisting including frames  
 Note:  
 Existing existing furniture etc. to be retained to be covered  
 by new partitions etc. for protection of existing furniture  
 etc. to be removed to be replaced by new furniture  
 Note:  
 All signage to comply with BS 5499 as existing, new fire exit signs  
 to be installed over existing signs to be installed in Corridor 1 & 2  
 Existing emergency lighting to be retained

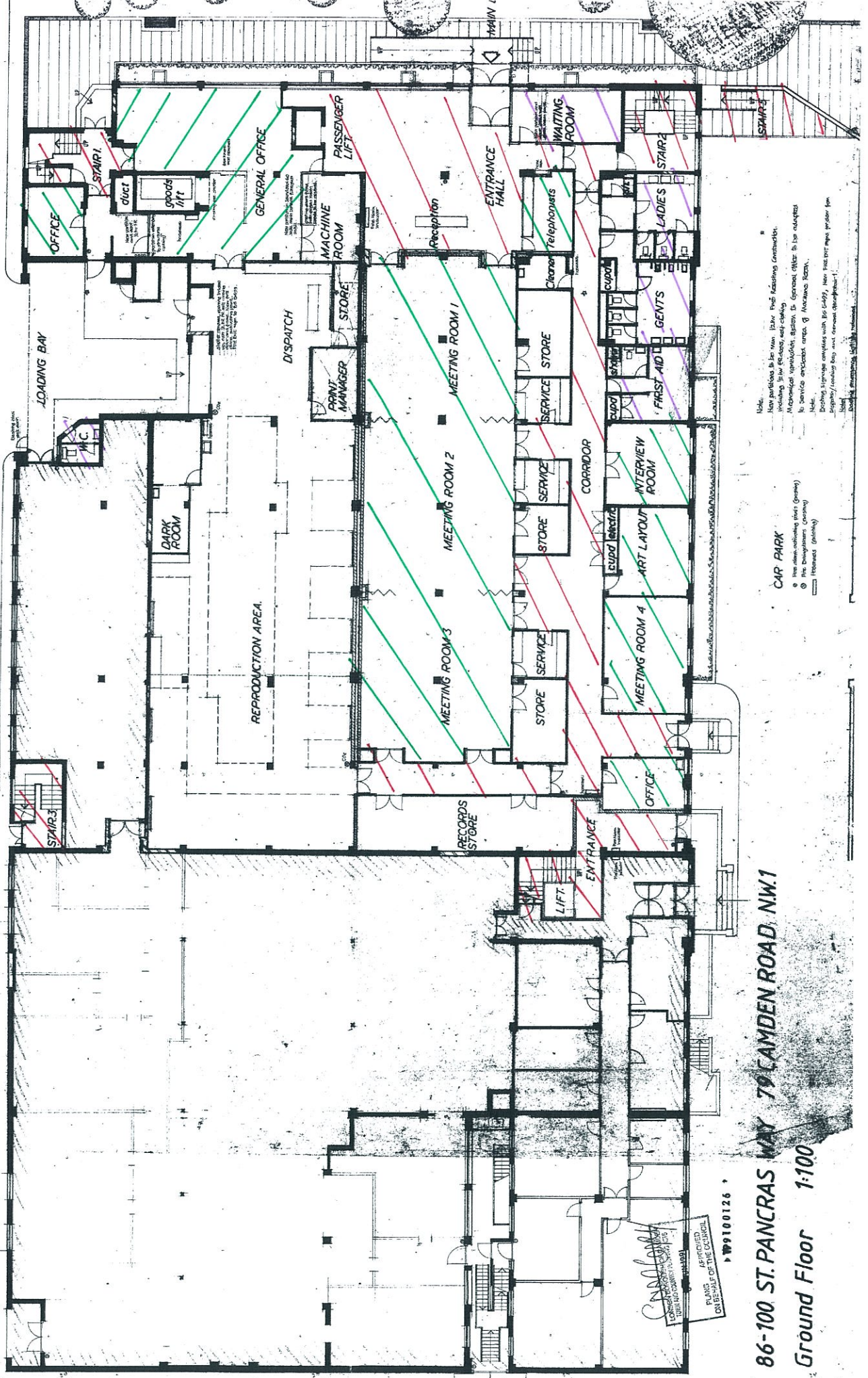
- Fire alarm, including panel (existing)
- Fire extinguishers
- Electrical (existing)

05 JUN 1991  
 APPROVED  
 PLANS  
 ON BEHALF OF THE COUNCIL  
 99100126

**86-100 ST. PANCRAS WAY 79 CAMDEN ROAD N.W.1**

**First Floor 1:100**

ROCHESTER PLACE



Note:  
 New partitions in the main (2nd) floor existing construction.  
 including 10 for reception, rest-closets.  
 Mechanical ventilation system, Dr. General Office to be subject  
 to service engineer's report & approval.  
 Note:  
 Existing structure complies with BS 5697, New fire door provide for  
 display/loading bay and crane operation.

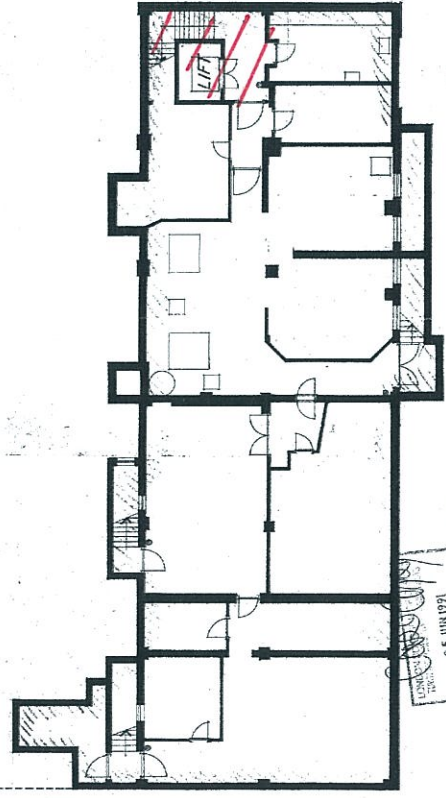
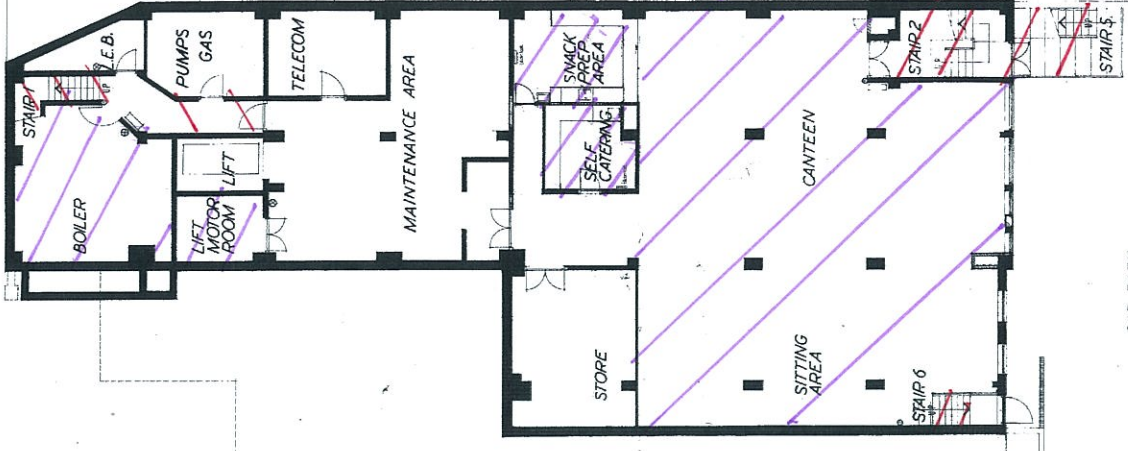
CAR PARK  
 • New area, including plant (green)  
 • The Downstairs (green)  
 • Proposed (pink)

PLANS ATTACHED  
 ON BEHALF OF THE CLIENT  
 199100126

86-100 ST. PANCRAS WAY 79 CAMDEN ROAD, NW.1

Ground Floor 1:100





05 JUN 1991  
 PLANNING DEPARTMENT  
 COUNCIL OF THE COUNCIL

TP9100126-04

86 - 100 ST. PANCRAS WAY 79 CAMDEN ROAD NW1

Basement 1:100

CAR PARK

2002 Temporary doctors surgery application. Ref: PEX020064

Ogives  
Ancillary  
Circulation



The James Wigg Practice



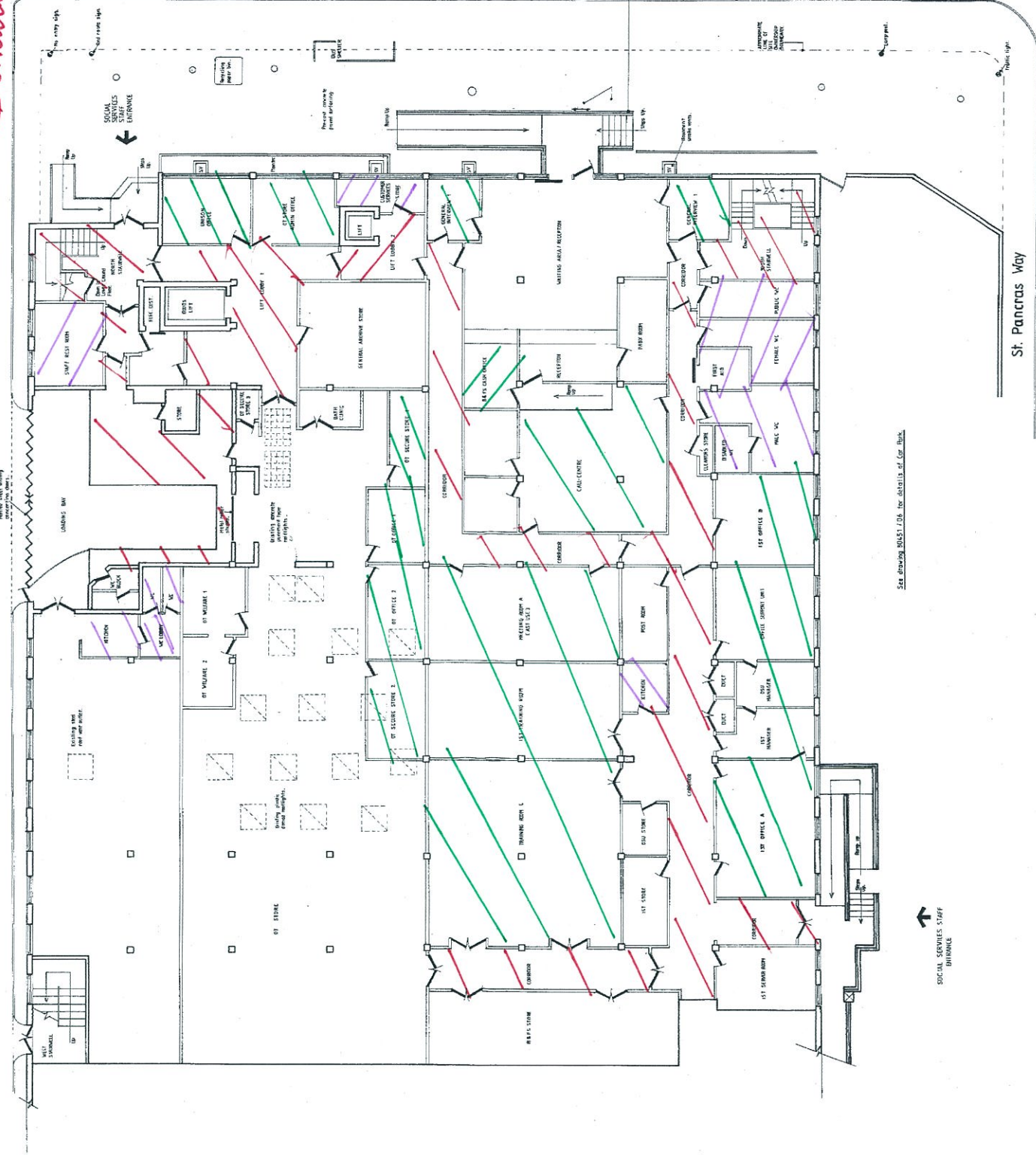
Camden Road

SOCIAL SERVICES  
PUBLIC  
ENTRANCE

Noted door, indicating an area existing with

LINE OF WORK

Rochester Place



See drawing MUSE1/08 for details of Car Park

SOCIAL SERVICES STAFF  
ENTRANCE

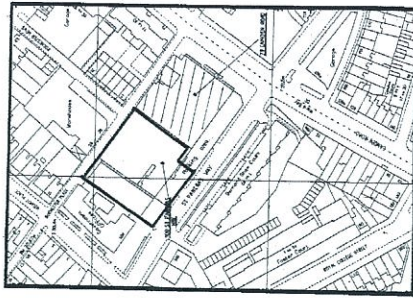
St. Pancras Way



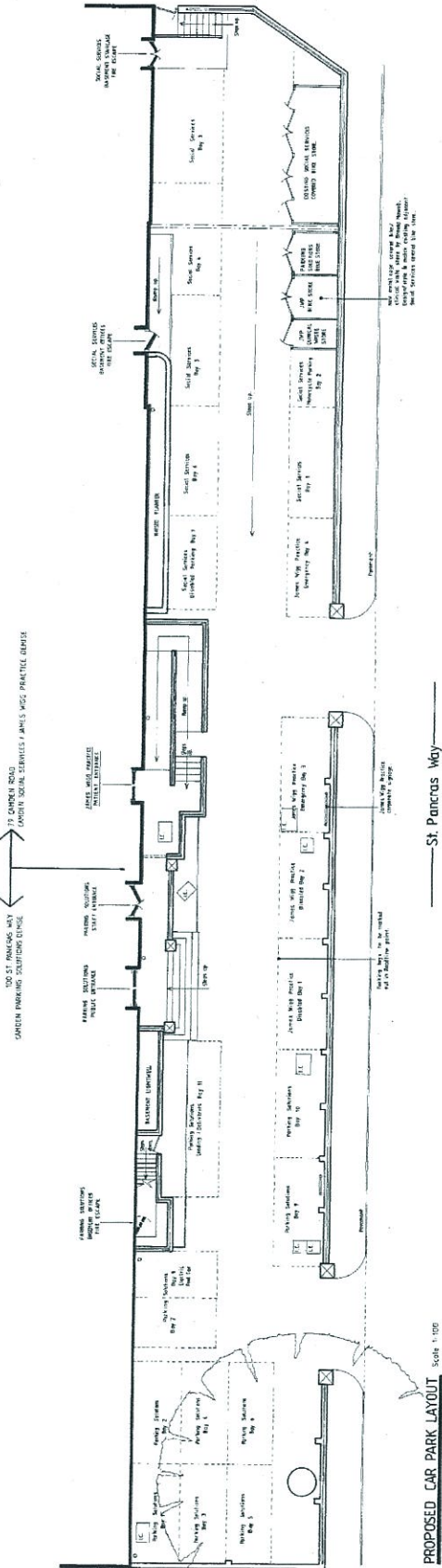
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0203 211 2100

JAMES WIGG PRACTICE  
KENTISH TOWN SOCIAL WORK TEAM  
- RECENT TO 79 CAMDEN ROAD

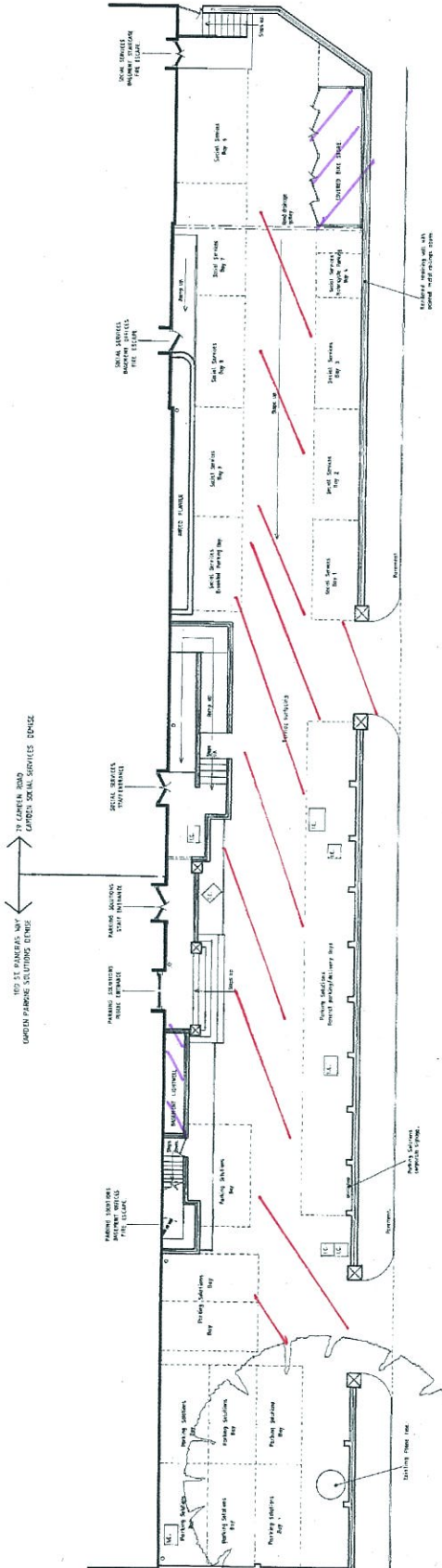
EXISTING GROUND FLOOR PLAN  
JAMES WIGG PRACTICE  
Scale: 1:100  
Date: 01/01/02  
Drawn: [Name]  
Checked: [Name]  
Project No: 00511/01



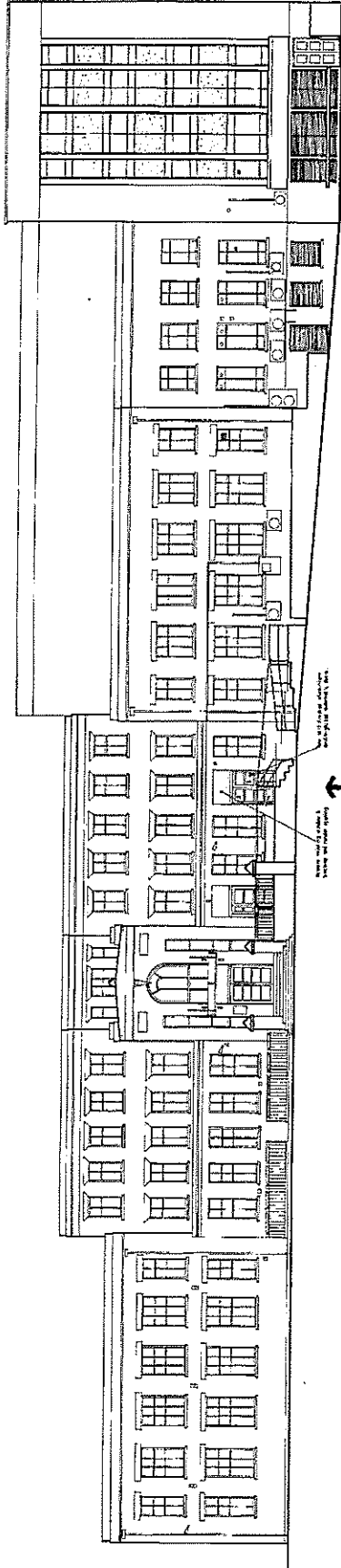
LOCATION PLAN Scale 1:1500



PROPOSED CAR PARK LAYOUT Scale 1:100

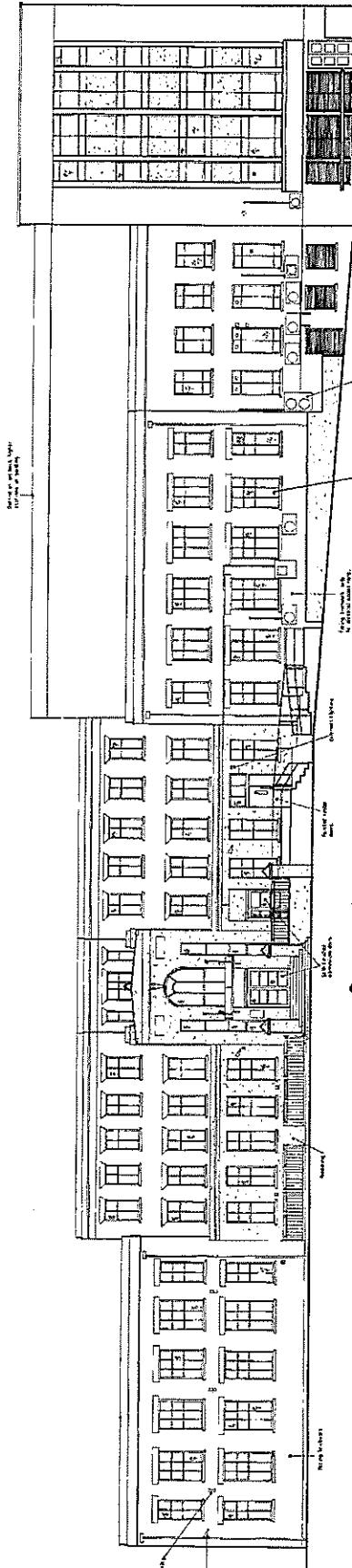


EXISTING CAR PARK LAYOUT Scale 1:100



**PROPOSED ST PANCRAS WAY ELEVATION**

100 ST PANCRAS WAY  
CAMDEN SOCIAL SERVICES BUILDING



**EXISTING ST PANCRAS WAY ELEVATION**

100 ST PANCRAS WAY  
CAMDEN SOCIAL SERVICES BUILDING

**Inglisier Wood**

11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

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## Appendix 1 – Previous Floorplans (associated with Planning History)

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## Appendix 2 – GP and Dental Surgery Capacity Analysis

### Introduction

This update note provides an overview of current GP and Dental Surgery provision and capacity within an 800m radius of 86 – 100 St Pancras Way and 79 Camden Road. It was originally prepared in response to feedback from the Developer’s Briefing (to the DC Committee and Ward Members) and from the local community at the public consultation events in regard to incorporating GP or dental surgery floorspace within the redevelopment proposals (September 2013 note).

An original note assessed facilities within a 1 km and 1 mile radii of the site. However, following feedback from the London Borough of Camden, it has been revised to assess provision within 800 metres of the site. We understand these distances have been determined having regard to the recent publication of Building for Life 124 which recommends that new residential development should be located whereby everyday facilities and services are within a short walk of people’s homes.

### Background

The site is currently vacant. Its lawful use is offices ((Class B1(a)). Between 2002 and 2008 the site was understood to have temporarily been used for a doctor’s surgery (Class D1) whilst Kentish Town Health Centre at 2 Bartholomew Road, was being redeveloped (Ref: PEX0200664 and 2006/1860/P).

Feedback from the Developer’s Briefing and public consultation exercises queried whether a GP, or dental surgery, could be provided on-site.

Camden Policy (DP15) requires that new development creating additional demand for community service provision, including health services, should make a contribution toward supporting existing facilities or provide new facilities. Paragraph 15.3 of DP15 sets out in assessing the impact of new development the Council will consider existing community facilities accessible to the development and their available capacity.

Accordingly, this note provides a review of the existing GP and dental surgery provision accessible to the development and analyses their capacity to conclude that the impact of the proposed development can be accommodated within the existing surrounding capacity.

### GP Surgeries

3 GP surgeries are identified within 800m of the site with a further 2 just over 1 km (see Map 1 at end of note), all have confirmed that they are accepting new patients.

Within the 3 immediate surgeries there are 30 GPs for which the GP: Patient ratio is 1 GP to 924 patients (see Table 1, below).

This falls substantially below the average for the Camden Clinical Commissioning Group which is 1 GP per 1477 patients. Moreover, the standard level of provision assumed by the NHS and Department of Health Planners used to inform the ODPM Reforming Planning Obligations Document (November 2004) cites a standard level of 1 GP per 1,700 residents.

<sup>4</sup> <http://www.designcouncil.org.uk/our-work/CABE/Our-big-projects/Building-for-Life/>

## Appendix 2 – GP and Dental Surgery Capacity Analysis

**Table 1: GP Provision within 800m and close to 1 km radius of site**

	Walking Distance from Site	Name of GP Surgery	Postcode	Accepting Patients?	Number of GPs	Patients	GP: Patient Ratio
<b>800m from site</b>	0.643	1 - James Wigg Group Practice	NW5 2BX	Y	24	18,282	1 : 762
	0.8	2 - Plender Street Practice	NW1 0LB	Y	1	2,998	1 : 2,998
	0.8	3 - Ampthill Practice	NW1 1TN	Y	5	6,428	1 : 1,286
<b>Total</b>					<b>30</b>	<b>27,708</b>	<b>1:924</b>
<b>1km from site</b>	1.12	4 - Prince of Wales Group Practice	NW5 3NT	Y	10	7,338	1 : 734
	1.28	5 - The Caversham Group Practice	NW5 2UP	Y	12	13,796	1 : 1,150
<b>Overall Total</b>					<b>52</b>	<b>48,842</b>	<b>1:939</b>

The proposed development of 166 units will generate additional demand on services from approximately 300 adults and children. Based upon the above analysis it is therefore considered that this demand will have a negligible impact upon capacity, and can be readily accommodated within the existing local supply without giving rise to a need for provision of a new surgery.

### Dental Surgeries

There are 6 NHS dental practices within the 800m radius of the site. All are accepting new patients. An additional 2 practices are identified within a kilometre of the site (see Table 2).

A dentist : patient ratio was not possible to determine from the dental practices surveyed, owing to the manner of how NHS and private patients are sub-divided for each dentist. Nevertheless there was no indication of any restrictions for new patients that are being accepted.

Accordingly it is again considered that demand from any residents of the proposed new development could be accommodated within the existing local service network.



## Appendix 2 – GP and Dental Surgery Capacity Analysis

**Table 2: Dental Surgery Provision within 800m and 1 km radius of site**

	Walking Distance from Site	Name of Dental Surgery	Postcode	Accepting Patients?
<b>800m from the site</b>	0.32	1 - Iny House Dental Practice	NW1 8NX	Yes
	0.8	2 - Kentish Town Urgent Dental Service	NW5 2AJ	Yes
	0.48	3 - Associated Dental Practices	NW1 9PY	Yes
	0.8	4 - IS Dental Care	NW5 2AG	Yes
	0.8	5 - Camden Dental Centre	NW1 7JL	Yes
	0.78	6 - Parkway Dental Care	NW1 7AN	Yes
<b>1 km from the site</b>	0.96	7 - Camden High Street Dental Practice	NW1 0JH	Yes
	0.92	8 - Mornington Dental Surgery	NW1 1TU	Yes

### Conclusion

The above analysis demonstrates that there is existing capacity within the surrounding GP and dental practice network to accommodate the additional residents from the proposed redevelopment at 86 – 100 St Pancras Way and 79 Camden Road. Accordingly it is not considered appropriate to provide on-site facilities as part of the proposals.

## Appendix 2 – GP and Dental Surgery Capacity Analysis

### Map 1 - GP Surgeries

Green indicates within 800 m of site, red close to 1 km of site



## Appendix 2 – GP and Dental Surgery Capacity Analysis

### Map 2 – NHS Dental Practices

Green indicates practices within 800 m of site, red within 1 km of site

