

# 102

# Camley Street, London N1C 4PF

## Planning Statement

June 2014



REGENT RENEWAL LTD





**102 CAMLEY STREET**

**PLANNING STATEMENT**

**June 2014**

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## 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Ltd (DP9) on behalf of Regent Renewal Limited in support of a planning application for the redevelopment of the site known as 102 Camley Street which is bound by Camley Street to the west, 104 Camley Street to the north, Network Rail and CTRL railway lines to the east and the Regent's Canal to the south.

1.2 The redevelopment will provide a mix of flexible light industrial and employment space (Class B1 and B1(c)), residential units (Class C3), and public realm improvements including a new cycle ramp and separate pedestrian steps from Camley Street to the Regent's Canal towpath. The description of development is set out below:

*“Demolition of existing buildings and structures at 102 Camley Street and the subsequent redevelopment for a mixed use building ranging from 8 – 12 storeys comprising 1,620 sqm GEA employment floorspace (Class B1), 154 residential units, provision of a cycle ramp, improvements to the public realm and all other necessary enabling works”.*

1.3 The proposed redevelopment will provide opportunities for significant enhancement to the physical and environmental condition of the site to deliver a mixed use scheme including commercial floorspace which has been designed to meet modern business requirements as well as high quality residential accommodation including on site affordable homes for local people. The proposed development will provide substantial improvements to the public realm and pedestrian and cyclist linkages between Camley Street and the canal towpath.

1.4 The submission of this application follows discussions with a wide range of stakeholders and statutory consultees, including both the planning and design teams at the London Borough of Camden (LBC) and the Greater London Authority (GLA), Canal and Rivers Trust (C&RT), local businesses, ward councillors, local groups, the Camley Street Neighbourhood Forum, and local residents.

1.5 This statement should be read and considered in conjunction with the plans and drawings submitted as part of this planning application. The Council has confirmed that the following documents are required for the validation of the planning application:

- Design & Access Statement (including Landscaping) – Glenn Howells Architects and Turkington Martin;

- Strategic Overview of Employment Spaces to the Gateway Sites – Shaw Corporation;
- Arboricultural Report – Aspect;
- Basement Impact Assessment – Arup;
- Construction Method Statement – Arup;
- Geotechnical Desk Study (Contamination and Remediation Report) – Arup;
- Energy Assessment – McBains Cooper;
- Sustainability Strategy – McBains Cooper;
- Daylight, Sunlight, Overshadowing Report – GVA Schatunowski Brooks;
- Transport Assessment – TTP;
- Travel Plan – TTP;
- Townscape, Heritage and Visual Impact Assessment – Kevin Murphy & AVR;
- Affordable Housing Economic Viability Report – Shaw Corporation;
- Wind and Microclimate Report – RWDI;
- Noise and Vibration Assessment – Sandy Brown;
- Ecological Report – Aspect Ecology;
- Air Quality Assessment – Arup; and
- Statement of Community Involvement – Indigo;

1.6 This document provides an overview of the site and the development proposal and an evaluation of the proposed development against the relevant national, strategic and local planning policy and guidance. The Planning Statement is structured as follows:

- **Section 1** provides an introduction to the document;
- **Section 2** presents an executive summary identifying the planning benefits of the proposed development;
- **Section 3** describes the site and the context of the surrounding area;
- **Section 4** provides a description of the proposed development;
- **Section 5** summarises the planning consultations undertaken;
- **Section 6** sets out the relevant national, regional and local planning policies relevant to the planning application and provides an assessment of the proposed development against these policies;
- **Section 7** provides draft Heads of Terms for a Section 106 Agreement; and
- **Section 8** sets out our conclusions.

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**2.0 EXECUTIVE SUMMARY: THE PLANNING BENEFITS OF THE PROPOSED DEVELOPMENT**

- 2.1 The key planning benefits arising as a result of the proposed development are summarised below:
- 2.2 The provision of residential accommodation will help to significantly boost local housing supply, thereby seeking to address increasing housing demand.
- 2.3 Affordable housing provision is proposed to be delivered on site. A quarter of the total residential floorspace proposed will provide a mix of affordable rented and shared ownership residential accommodation. The proposals include the provision of wheelchair accessible units and family units including large family units, which seek to address the current housing pressures facing the local area.
- 2.4 The proposal will promote mixed and inclusive communities. The proposals will contribute towards improving the housing mix in this part of the borough.
- 2.5 The existing employment space on the site is of a poor quality. Camden's 2008 Employment Land Review acknowledged that warehouse activities in this area have become marginalised as a result of the significant changes occurring around the Kings Cross and St Pancras area and that it is increasingly impractical to seek to protect them in an area that is no longer a coherent industrial area. The proposed development will significantly increase the employment density currently being achieved on the site, therefore increasing the number of jobs.
- 2.6 It is proposed that the overall amount of employment floorspace on the site is increased. The proposed employment floorspace will provide flexible workspace for small and medium sized enterprises, with the opportunity to provide follow on accommodation from the incubator space being provided at 103 Camley Street. A proportion of the business units will be provided at subsidised market rents to encourage local businesses including business start-ups to locate to the site.
- 2.7 Glenn Howells Architects have developed a high quality architectural design for the site in order to maximise the development potential of the site; optimising the provision of employment and residential accommodation.
- 2.8 The site at 102 Camley Street forms one of the Camley Street gateway sites (in addition to 101 and 103 Camley Street). The design of the scheme has been developed to ensure that there is consistency between these development sites to maximise the potential for increased connectivity and public realm improvements between the three sites.

- 2.9 The site is located within a highly accessible location and therefore is suitable for high density development. The site is well served by public transport and is a short walk from major public and international transport interchanges.
- 2.10 In addition to the introduction of stepped access from the site to the Regent's Canal, the proposals include the provision of a cycle ramp from Camley Street to the Regent's Canal towpath level. This will significantly improve connections from Camley Street to Kings Cross and Camden Town.
- 2.11 In terms of sustainability, the proposed development will meet the requirements set at the regional and local level. The building will incorporate energy efficient measures to minimise carbon emissions. The proposed employment space will meet BREEAM excellent standards and the residential accommodation will meet Code for Sustainable Homes level 4.

### 3.0 SITE & SURROUNDING AREA

#### The application site

- 3.1 The site is located on Camley Street, immediately to the north west and north of Kings Cross and St Pancras stations respectively. The site is irregular in shape and is bound by Camley Street to the west, 104 Camley Street to the north (Hewlett Packard office and warehouse), Network Rail and CTRL railway lines to the east and Regent's Canal to the south. The site covers an area of approximately 0.25 hectares.
- 3.2 The application site comprises a warehouse building (Class B8), which comprises approximately 1,008 sqm and was most recently occupied by Marigold Health Foods as a storage and distribution centre. Marigold has relocated to new larger premises in Tottenham as part of the business expansion requirements.
- 3.3 There is a level change of 3.75 metres from the south of the site at the canal towpath level, up to street level at the northern part of the site at Camley Street.
- 3.4 The site is located in close proximity to Kings Cross Regeneration Area, and a short distance from Camden Town. King Cross development T1 is located directly to the east of the site on the opposite side of the railway.
- 3.5 The site is located within the designated viewing corridor for the protected vista from Parliament Hill to St Paul's Cathedral.

#### *Heritage and conservation*

- 3.6 There are no statutorily listed buildings within the curtilage of the site or close by. The site is adjacent to the Regents Canal Conservation Area and is close to the Kings Cross Conservation Area.
- 3.7 Further information regarding the location of listed buildings and their settings in the wider area surrounding the site can be found in the Townscape, Heritage and Visual Impact Assessment supporting application document prepared by KM Heritage and AVR.

#### *Accessibility*

- 3.8 In relation to Kings Cross and St Pancras transport interchanges, new station entrances have recently been opened which reduces the walk distances from the site which has a significant effect upon the PTAL of certain locations. The manual PTAL

rating for the site is 6a 'excellent', which is one of the highest levels of accessibility. This is discussed further in the Transport Assessment prepared by TTP.

### **Planning history**

- 3.9 In April 2014 an Environmental Impact Assessment (EIA) Screening Opinion Request was submitted to the Council (application reference 2014/2550/P). On 30 April 2014 the Council decided that the proposed development is not considered to be likely to have significant effects on the environment and accordingly confirmed that the development is not EIA development. Notwithstanding the fact that the proposed development is not EIA development, a number of the application documents submitted as part of this planning application provide a cumulative assessment of the impacts of the developments proposed at 101 and 102 Camley Street to ensure that these impacts have been fully assessed.
- 3.10 There are no other recent, relevant planning applications at the site.
- 3.11 Prior approval was given for the installation of a telecommunications equipment cabinet on the public footpath on the pavement alongside 102 Camley Street in October 2012 (application reference 2012/5804/P).
- 3.12 In March 1994, planning permission was granted for alterations to the north and south elevations and amendments to site layout in connection with use as a wholesale warehouse (application reference PL/9301137/R2).

### **The surrounding area**

- 3.13 The site is located in the St Pancras and Somers Town ward and has historically been an area of railway hinterland between Kings Cross and Camden Town. The surrounding area predominantly comprises light industrial and storage uses along Camley Street to the north and south, with some residential streets to the western side of Camley Street.
- 3.14 To the east of the site, 102 Camley Street is currently disconnected from the regeneration of Kings Cross as a result of the railway line which divides the two sites. These poor connections to the east are amplified by the lack of access from the site to the canal towpath.
- 3.15 To the south and west of the Regent's Canal are a mix of industrial uses, St Pancras Coroners Court, St Pancras Hospital buildings and St Pancras Gardens which provide a large area of open space.

- 3.16 The site forms part of the Camley Street Gateway; a cluster of buildings at 101, 102 and 103 Camley Street. These gateway sites are under different land ownerships and are being promoted for comprehensive mixed use development by different developers. The proposed redevelopment of 102 Camley Street should be considered as a standalone development, however the sites are coming forward for development over a similar timescale.
- 3.17 Planning permission for the redevelopment of 103 Camley Street for a 4 – 12 storey building to provide a mix of student housing, residential housing, business and retail uses was granted in March 2012 (application reference 2011/1072/P). Construction on site is currently underway, and the scheme is anticipated to be completed later this year.
- 3.18 The Council are also in discussions with the owners of 101 Camley Street regarding the redevelopment of the site to provide a mix of business and residential space.

## 4.0 APPLICATION PROPOSAL

### Summary of overall concept

- 4.1 A full assessment of the proposed development is contained within the Design and Access Statement prepared by Glenn Howells Architects. This Planning Statement should be read in conjunction with the plans and drawings submitted as part of the application.
- 4.2 The concept behind the proposal is to provide a mixed use sustainable development that contributes to and enables a balanced and mixed community in the area and creates employment and enterprise opportunities as well as providing residential units, including on site affordable housing.
- 4.3 The proposed development will also seek to ensure that the accessibility of the site is greatly improved, including new connections between Camley Street and the canal towpath via a cycle ramp and stepped access greatly improving links between Camley Street with Camden Town, Kings Cross and adjacent areas. Overall the public realm will be greatly enhanced, and will create a cohesive sense of place between the Camley Street gateway sites at 102, 101 and 103 Camley Street.

### The proposed scheme

- 4.4 The application seeks full planning permission for:

*“Demolition of existing buildings and structures at 102 Camley Street and the subsequent redevelopment for a mixed use building ranging from 8 – 12 storeys comprising 1,620 sqm GEA employment floorspace (Class B1), 154 residential units, provision of a cycle ramp, improvements to the public realm and all other necessary enabling works”.*

- 4.5 The proposed scheme seeks to demolish the existing industrial warehouse building and construct a mixed use residential and commercial development. The proposed Class B1 and B1c employment and light industrial floorspace will be provided at ground floor, mezzanine and towpath level, which will provide the opportunity to provide flexible business units to accommodate different size and layout requirements per future occupier. The employment floorspace has been targeted at enterprise businesses to provide a next step from the Incubator employment space provided at 103 Camley Street, and will complement the corporate headquarters developments being constructed on the neighbouring Kings Cross Central Masterplan. The employment space will focus on small and medium sizes businesses

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(SME's). This report should be read in conjunction with the Strategic Overview of the employment spaces at the Gateway sites prepared by Shaw Corporation.

- 4.6 Two cores will provide access to the twelve floors of high quality residential accommodation, including a setback penthouse level, which will provide a total of 154 residential units. Affordable housing will be provided on site, accessed via a dedicated core (in the case of the affordable rented and part of the shared ownership units) or integrated with the market housing (for the balance of the shared ownership, although some shared ownership units will be accessed via the market housing core). An affordable housing viability toolkit has been undertaken to determine the maximum reasonable proportion of affordable housing that the scheme can viably afford, as discussed in further detail in Section 7 of this report.
- 4.7 A new cycle ramp will connect Camley Street to the Regent's Canal towpath, together with steps and a pedestrian link route through the northern wing of the proposed scheme towards future development sites beyond. Enhancement works will be undertaken to the canal towpath, including the widening of this amenity space, and well as works to the public realm at the ground level of the development and the provision of roof top amenity space.
- 4.8 The architectural form of the building is roughly an L shape, which creates a sawtooth façade on the eastern elevation to the railway line generating winter gardens for residential apartments which have south facing views. Roof terraces are provided and all apartments either have private balconies or winter gardens. The arrangement of the building opens up the site to the street and provides amenity space to the public frontage whilst sheltering the road from the railway line.
- 4.9 In designing the proposed development, careful consideration has been given to the detailed treatment of the building elevations and materials used to provide a strong sense of connectivity and cohesion between the three gateway sites at 101, 102 and 103 Camley Street. The development proposals include the provision of a shared surface between 102 and 103 Camley Street, and a landscaping scheme has been co-ordinated between the three sites. Further details of this can be found in the Design and Access Statement prepared by Glenn Howells Associates and Turkington Martin.
- 4.10 The proposed development will be car free, with the exception of 2 on-site disabled parking spaces. Cycle parking for staff, residents and visitors will be provided securely in the basement of the proposed scheme (253 spaces in total of which 16 will be dedicated for the commercial units).

- 4.11 The scheme will be served by a new centralised plant room and Combined Heat and Power in the basement of the proposed development. In addition, the scheme will be supported by renewables including Photo Voltaic panels.

### Proposed floorspace schedule

- 4.12 A breakdown of the existing and proposed floorspace is provided in Table 1 below. A breakdown of the residential accommodation is provided in Table 2 below.

*Table 1 – Existing and proposed business floorspace*

Use Class	Existing Floorspace (sqm GIA)	Proposed Floorspace (sqm GIA)	Proposed Floorspace (sqm GEA)
<b>Class B1</b>	1,008	1,530	1,620

*Table 2 – Proposed residential accommodation*

		Number of units and floorspace
<b>Class C3 Market Housing</b>	<b>Studio</b>	3
	<b>1 bedroom</b>	39
	<b>2 bedroom</b>	45
	<b>3 bedroom</b>	30
	<b>TOTAL</b>	<b>117 units (11,080 sqm GIA)</b>
<b>Class C3 - Affordable Shared Ownership</b>	<b>1 bedroom</b>	9
	<b>2 bedroom</b>	7
	<b>Sub Total</b>	<b>16 units</b>

<b>Class C3 - Affordable Affordable Rent</b>	<b>1 bedroom</b>	8
	<b>2 bedroom</b>	3
	<b>3 bedroom</b>	8
	<b>4 bedroom</b>	2
	<b>Sub Total</b>	<b>21 units</b>
<b>Shared Ownership and Affordable Rent</b>	<b>TOTAL</b>	<b>37 units (3,628 sqm GIA)</b>
<b>TOTAL RESIDENTIAL UNITS</b>		<b>154 UNITS (14,707 SQM GIA)</b>

\*note that residential GIA figures include apportioned areas for residential entrances, cores, cycle store, waste and residential plant.

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## CONSULTATIONS

- 4.13 The submission of this planning application follows extensive consultation undertaken over a period of more than 6 months. This process has seen the scheme develop through close consultation with Camden Council's officers, as well as local residents, businesses, representative organisations and ward Members.
- 4.14 Full details of the pre-application consultation can be found in the Statement of Community Involvement submitted as part of this application.

### London Borough of Camden

- 4.15 The project team have met with the planning and design officers on numerous occasions through formal pre-application meetings and break out design workshops.
- 4.16 The design has evolved as a result of these meetings with Camden's planning and design officers in line with the advice and comments received, most notably in terms of the reduction in the height of the development and the introduction of steps from the towpath level and the provision of a pedestrian link through the northern block of the building to connect to future development to the north of 102 Camley Street and the introduction of a cycle ramp access to the towpath.
- 4.17 In addition, discussions have also been held with economic development, housing and highways departments to discuss the development proposals.
- 4.18 Through these meetings officers at the LBC have confirmed the following:
- Officers are strongly supportive of the principle of increased employment provision on the site, and providing a higher density employment use within flexible workspace units for Small and Medium Enterprises (SME) occupiers and as move on space for enterprises emerging from the Incubator at 103 Camley Street and CTU's Collectives in Camden Town;
  - Officers welcomed the proposals for a mix of uses on the site, including residential;
  - Agreement was reached with LBC regarding the height, scale and massing of the development proposals;
  - Agreement was reached with highways and design officers in relation to the provision and design of the cycle ramp from Camley Street to towpath level;

- LBC strongly supported the provision of on site affordable housing as part of the development proposals, and consider that the quantum of affordable housing proposed would be subject to a viability assessment;
- Housing officers agreed the proposed housing mix and wheelchair unit standards to be achieved.

### **Greater London Authority**

- 4.19 A formal pre-application meeting was held with Greater London Authority (GLA) planning officers on 20 May 2014. Formal feedback from the GLA can be found at Appendix 1 of this report.
- 4.20 The feedback from the GLA has been positive, particularly in support of the regeneration of the Camley Street gateway sites, the proposed building height and mass, the provision of replacement flexible employment space, and the high quality architecture.
- 4.21 The public realm improvements including the cycle ramp and steps down to towpath level were also strongly supported. The proposed level of affordable housing provision was strongly supported by the GLA, subject to demonstrating that this is the maximum viable amount achievable.
- 4.22 Comments from the GLA have helped to shape the final scheme design, in particular the entrance points for the concierge and affordable housing.

### **Transport for London**

- 4.23 Transport for London (TfL) attended the pre-application meeting held by the GLA. The Transport Assessment prepared by TTP sets out how the development proposals meet the TfL guidance.

### **Canal and Rivers Trust**

- 4.24 A number of meetings have been held with Canal and Rivers Trust (CRT) in relation to the proposed enhancements at towpath level, the under bridge lighting and the provision of the cycle ramp to towpath level. Overall the CRT is supportive of the proposed development and the applicant will continue to engage with CRT through the development process.

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**Local Members**

- 4.25 Discussions have been held with local ward councillors throughout the design development process. Feedback from the councillors has been enthusiastic about the proposed redevelopment of the Camley Street gateway sites.

**Camley Street Neighbourhood Forum**

- 4.26 A number of meetings and consultation events have been held with the Camley Street Neighbourhood Forum to discuss the application proposals.

**Public consultation**

- 4.27 Two public exhibitions have been held at the Frank Barnes School for the Deaf that is located adjacent to the 103 Camley Street site at Elm Village. The public exhibitions were held on the 6 March and 10 June 2014. Invitations for the exhibitions were sent to all of the local residents around Camley Street. Approximately 1,800 invitations were sent out for each exhibition.
- 4.28 The first exhibition was held between 4pm and 8pm in the school hall and was well attended, with a total of 38 visitors and 8 feedback forms being returned.
- 4.29 The second exhibition was held between 4pm and 7pm in the school hall and was followed by a question and answer session between 7pm and 8pm. The exhibition was attended by 15 visitors and 4 feedback forms were returned.
- 4.30 Following on from the public exhibitions, Regent Renewal and the project team will continue to engage with the local community to keep them up to date regarding the progress of the development.

**Other key stakeholders**

- 4.31 In addition to the above, several meetings and discussions have been held with Network Rail, UCL, Urbanest and other local stakeholders.

**Conclusions regarding pre-application consultation**

- 4.32 The consultation undertaken on the proposals has returned very positive levels of support for the scheme. There is a strong desire from local residents to see the development brought forward, to see investment within this part of London and to deliver new homes and business space.

- 4.33 Local residents have welcomed the early and committed engagement from the project team and the team have been pleased to see the enthusiasm shown towards the proposals.
- 4.34 Wider community groups have also engaged during the consultation process and have responded positively to the overall objectives of the proposed development.
- 4.35 The development team have responded to feedback received following various meetings held with officers from the London Borough of Camden.

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## 5.0 PLANNING POLICY AND ASSESSMENT OF PLANNING ISSUES

5.1 This section identifies the statutory development plan which is relevant to the application site, and provides an evaluation of the proposed development against the relevant planning policies. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level there is both planning policy and guidance which combine to provide the framework for the consideration of the proposed development.

### **National planning policy**

5.2 The National Planning Policy Framework (NPPF) was adopted on 27 March 2012 and provides planning policy guidance at a national level and is a material consideration in the determination of planning applications.

5.3 At the heart of the NPPF is a presumption in favour of sustainable development, for both plan making and for decision taking. The NPPF directs local planning policies to approve development proposals that accord with the development plan without delay. The NPPF supports sustainable economic development, including the delivery of new business units, and also seeks to significantly boost the supply of new housing.

5.4 The proposed development will use previously developed (brownfield) land within an area of good accessibility for the provision of new homes and enhanced business space. The NPPF supports mixed use developments, such as the proposed development, which seeks to respond positively to the opportunities for growth. The design has been informed by the principles of sustainability and is therefore compliant with the underlying principles of the NPPF.

5.5 The Government published National Planning Policy Guidance (NPPG) on 6 March 2014, which effectively cancels the majority of previous planning practice guidance documents. This online, up-to-date planning practice guidance is a material consideration in the determination of planning applications, and has been considered as part of our assessment of the development proposals considered within this section.

### **The development plan**

5.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan for the site is:

- The London Plan (2011)
- The Revised Early Minor Alterations to the London Plan (2013)
- Draft Further Alterations to the London Plan (2014)
- Camden Core Strategy (2010)
- Camden Development Policies (2010)
- Camden Planning Guidance documents (various).

5.7 The London Plan was published in July 2011. This document provides the overall strategic plan for London, setting out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031.

5.8 In October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). This document seeks to ensure consistency with the NPPF and the REMA are operative as formal alterations to the London Plan.

5.9 Between January and April 2014, the Mayor consulted on draft Further Alterations to the London Plan (FALP). The FALP has been prepared to respond to address key housing and employment issues emerging from an analysis of census data which indicates a substantial increase in the capital's population. Although not formally adopted, the proposed draft FALP has minor weight as a material consideration in the determination of planning applications.

5.10 The Greater London Authority (GLA) has produced a number of documents which provide more detailed strategic guidance regarding London Plan policies and are also relevant to the proposed development. These include:

- London View Management Framework (March 2012)
- Sustainable Design and Construction SPG (April 2014)
- The Mayor's Climate Change Mitigation and Energy Strategy (2011)
- The Mayor's Transport Strategy (May 2010)
- The Mayor's Economic Strategy (October 2010)
- Use of Planning Obligations in the Funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)
- Interim Housing Design Guide (2010)

5.11 Where relevant within the supporting application documents these guidance notes have been referred to. They tend to relate to detailed technical or individual topic matters and have not all been directly referred to in this Planning Statement.

5.12 The London Borough of Camden LDF comprises a suite of planning policy documents to guide and inform development within the borough. The principal documents

within the LDF are the Core Strategy and the Development Policies documents which were both adopted in 2010. The Council has started to review these documents to ensure that they are up to date, reflect current circumstances and help to deliver local priorities. A Draft Local Plan is anticipated to be published for public consultation later this year.

- 5.13 LBC have also prepared a number of Camden Planning Guidance documents. Where relevant these documents have also been considered.

### **Site designations**

- 5.14 The site is identified within the Camden Proposals Map as having the following site specific designations:

- Designated View 2A.1 Parliament Hill summit to St Paul's Cathedral – Right Lateral Assessment Area
- Border of Regent's Canal Conservation Area
- Border of Regent's Canal Open Space

### **Planning policy assessment**

- 5.15 This section reviews all of the above policies which are relevant to the proposed development and provides an assessment of how the proposed development complies with planning policy in respect of the following:

- i. Land use - commercial / employment floorspace;
- ii. Land use - residential
- iii. Residential accommodation, unit mix and affordable housing;
- iv. Amenity;
- v. Design and conservation;
- vi. Landscape, biodiversity and playspace;
- vii. Energy and sustainability;
- viii. Transport, servicing and parking; and
- ix. Accessibility.

#### ***i. Land use – commercial / employment floorspace***

- 5.16 Camden Development Management Policy DP13 states where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:

- c) the level of employment floorspace is maintained or increased;
- d) they include other priority uses, such as housing and affordable housing;
- e) premises suitable for new, small or medium enterprises are provided;
- f) floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses; and
- g) the proposed non-employment uses will not prejudice continued industrial use in the surrounding area.

- 5.17 Criteria (c) and (e) together provide a key objective in the proposals for 102 Camley Street in that the new development proposals seek to provide increased floorspace for employment use, whilst at the same time using the new floorspace to provide premises for new, small or medium sized enterprises (SME).
- 5.18 The existing warehouse occupier, Marigold Health Foods, has relocated to new larger premises in Tottenham. The existing site is currently in a poor condition and no longer meets the operational requirements of Marigold, who are looking to accommodate their business expansion. The warehouse at 102 Camley Street has limited headroom and vehicular access, which results in an inability to copy with existing vehicle movements to and within the site. Previously Marigold were constrained by the site and had to for example take deliveries from medium sized and larger lorries direct from the street using fork lift trucks.
- 5.19 The relocation of Marigold, taken together with the Employment Land Review (2008) which acknowledged that warehouse activities have become marginalised and it is increasingly impractical to seek to protect them in an area no longer a coherent industrial area, provides the case for replacement employment use provision to meet modern businesses requirements.
- 5.20 It is proposed that the employment space within the site will provide 'move on' space for SMEs and will be particularly directed to provide 'move on' space for enterprises created within the Incubator at 103 Camley Street as well as the Collectives in Camden Town and other local enterprise initiatives.
- 5.21 In accordance with policy requirement (c), the level of employment floorspace on the site is proposed to increase from 1,008 sqm to 1,530 sqm GIA sqm. In addition, the business space brought forward by the development will add to the B1 floorspace currently available around Somers Town and will also provide a modern and efficient floorspace offer which is different and complementary to the Incubator space to be completed shortly at 103 Camley Street and different again from the neighbouring growth areas which are providing large office floorplates.

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- 5.22 Of the 1,320 sqm GIA employment floorspace proposed, it is anticipated that 20% of the space will be provided at a discount of 50% of market rent for a period of five years to facilitate new start-up enterprises.
- 5.23 In terms of lease structures, it is envisaged that new enterprises occupying the sub-market rent employment space will not be unnecessarily tied in to long leases, to allow flexible lease terms and occupation to encourage the development of new enterprises. Flexible lease structures will also be provided to the market rented employment space to ensure that occupiers are not obliged to remain in occupation for an initial period of more than five years.
- 5.24 The proposed business units will be flexible small to medium sized units, allowing for the provision of impressive loft-style light industrial warehouses spaces, with the potential to provide mezzanine floors as companies grow and expand (in accordance with policy requirement (e)). Unit sizes typically range for c.45 sqm up to 365 sqm with the ability to combine units to provide larger accommodation for expanding businesses. Smaller business spaces can be created by sub-division upon demand.
- 5.25 The employment space offer will provide a natural progression from the Incubator spaces provided at 103 Camley Street. The business units proposed will foster entrepreneurship and enterprise in the borough as a whole, capturing the knowledge economy and helping to reduce unemployment as well as forging links with established businesses in the borough and introduced within the Kings Cross Opportunity Area.
- 5.26 The scheme provides light industrial and office floorspace in place of the warehouse use in accordance with criteria (f) as it is deemed to be more suitable for enterprise businesses in relation to the context and other uses in the development. The business space is a good neighbour and entirely compatible with the residential use proposed above.
- 5.27 The commercial spaces will be actively managed on site via a commercial management office which will be open during normal working hours to provide assistance to business occupants and to provide a point of contact across the Gateway Sites to foster links with local employment and enterprise infrastructure.
- 5.28 In accordance with criteria (d) the scheme incorporates housing, including on-site affordable housing. This housing is not seen to prejudice the continued employment use in the surrounding area in accordance with criteria (g) as the scheme has been developed to ensure that the proposals integrate successfully into the surrounding environment.

- 5.29 The proposed development also complies with Core Strategy Policy CS8 as the development aims to promote a successful and inclusive Camden economy and provides a mix of employment facilities and types while supporting local enterprise development for Camden residents. There is a lack of high quality premises for small businesses and the proposal aims to address that problem.
- 5.30 At the strategic level the London Plan (2011), REMA and FALP policies state that the Mayor will work with boroughs to plan, monitor and manage the release of surplus industrial land to contribute to strategic and local planning objectives, especially those to provide more housing. The development site is not an identified Strategic Industrial Location and the GLA have confirmed that the proposed redevelopment of this employment site for a mix of employment and residential uses is strongly supported at the strategic level.
- 5.31 In addition the London Plan states that the Mayor will work with partners to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises (Policy 4.1). The London Plan is also supportive of mixed use developments (Policy 4.3). The proposed development at 102 Camley Street will seek to deliver flexible employment space and contribute to diversifying the local economy in Camden.
- 5.32 Overall, the proposed employment floorspace is considered to be compliant with the London Plan and Camden's planning policies.

***ii. Land use - residential***

- 5.33 As stated above, the London Plan supports mixed use development to increase housing supply and also seeks to optimise housing potential taking account local context and character, design principles and public transport capacity (Policy 3.4). Overall the site is considered to provide an excellent opportunity to optimise housing potential within this location.
- 5.34 The overarching principle advocated in Policy CS1 of the Core Strategy requires that developments promote the most efficient use of land and buildings in Camden. Policy CS1 also supports the development of a mix of uses in easily accessible locations in the borough to ensure that the most efficient and optimal use of land. The site is well served by public transport and is therefore capable of accommodating a larger scale, mixed use development.

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- 5.35 Development Policy DP1 helps to deliver Policy CS1 by setting out a detailed approach to mixed use development. DP1 states that the Council will require a mix of uses in development where appropriate, including a contribution towards the supply of housing.
- 5.36 As such, it is considered that the proposed redevelopment of 102 Camley Street is fully compliant with Policies CS1 and DP1 as it provides mixed use development in a highly accessible location and helps the Council meet their key planning policy objectives.
- 5.37 Core Strategy Policy CS6 seeks to provide quality homes and maximised the supply of housing in Camden to meet local housing need. The proposed development complies with the overall aim of CS6 by providing a windfall site which will contribute towards the Council's housing targets.
- 5.38 Camden Development Policies DP2 seeks to maximise the supply of additional homes in the borough. The development scheme will provide a significant contribution to the supply of housing on an underused site and therefore the proposal also accords with Policy DP2.
- 5.39 The provision of residential uses on site is therefore considered to be acceptable in principle.

***iii. Residential accommodation, unit mix and affordable housing***

- 5.40 In regards to residential uses, the NPPF seeks to "boost significantly the supply of housing". Paragraph 49 states that applications should be considered in the context of sustainable development.
- 5.41 NPPF paragraph 51 encourages local planning authorities to approve planning applications for change of use to residential from former commercial buildings, particularly in relation to offices, providing there are no strong economic reasons why such development would be inappropriate.
- 5.42 The London Plan and the FALP identify the urgent need to increase housing supply in London to address the substantial population increase in the capital. The draft FALP has proposed an increase in the annual housing target from c.32,000 new homes per annum to at least 42,000 new homes per annum. New housing starts for 2013 fell from the previous year to only 18,000 and when set against these increasing targets identifies the urgent need for new sustainable housing to come forward for early development as part of the mixed and sustainable planning strategies applicable. The

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proposed development would contribute towards the provision of new housing, in line with the aspirations of the London Plan.

- 5.43 In line with Policy CS6, the development will bring a diverse range of housing products to the market and will provide accommodation of different sizes as can be seen in the Design and Access Statement. In consultation with officers at Camden it has been agreed to meet as closely as possible Lifetimes Homes Standards and 10% have been designed to be wheelchair accessible or easily adaptable for wheelchair users. In consultation with officers at Camden it has been agreed to meet the Camden Wheelchair Housing Guidance standards for the affordable wheelchair units.
- 5.44 The scheme also complies with Policy DP2 which seeks to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing by maximising the use of an underused site and providing on-site affordable housing.
- 5.45 Core Strategy Policy CS6 also aims to secure high quality affordable housing is secured through negotiations to ensure that the affordable housing proposed represents the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development.
- 5.46 In line with Development Policies DP3, the applicant has considered whether it is possible for an affordable housing contribution to be made on site, taking account of the site and its constraints, the economics and financial viability of the development (including the particular costs associated with it), the impact on the creation of mixed and inclusive communities, other planning priority objectives as well as the substantial planning benefits to be provided.
- 5.47 A financial viability appraisal has been undertaken by Shaw Corporation with input from others. This assessment has confirmed that the maximum amount of affordable housing which can viably be delivered on the site is 25% (by area).
- 5.48 In discussions with LB Camden and GLA officers, the affordable housing mix has been refined to maximise opportunities to provide wheelchair accessible and family housing within the affordable rented tenure, and to focus the intermediate tenure units on the most affordable sizes for local people, being 1 and 2 bed units.
- 5.49 Whilst there is a requirement to create replacement employment space, and discussions have taken place about the leasing and rental arrangements to ensure flexible terms encourage small and medium enterprise businesses to take up this accommodation, the viability does not rely on subsidising the employment space by reduced affordable housing provision.

5.50 In accordance with London Plan Policy 3.5, the proposed development has been designed to meet the Mayor's minimum space standard for new development.

***iv. Amenity***

5.51 A comprehensive Daylight and Sunlight assessment has been undertaken by GVA Schatunowski Brooks, which has been submitted as part of this planning application. The report includes an assessment of the impact of the proposed development upon the existing properties surrounding the site, in particular 101, 103 and 104 Camley Street and the shared areas of public realm between these sites.

5.52 GVA Schatunowski Brooks conclude that the proposed development will not affect the neighbouring developments at 103 Camley Street and that the neighbouring buildings will retain well in excess of current guideline levels of light.

5.53 The study deals with the cumulative impact on the overshadowing of the Regent's Canal. There is no residual impact in terms of the shadow on the canal and the proposed amenity area within the courtyard of 102 Camley Street is fully BRE compliant.

5.54 The Daylight and Sunlight Assessment has also assessed the internal light standards within the proposed residential accommodation and concludes that internal daylighting will be good on the basis that there is almost full daylight penetration at every level of the building.

5.55 Overall the Daylight, Sunlight and Overshadowing Report concludes that the scheme is entirely satisfactory in respect of the BRE guidance.

5.56 A Noise Impact Assessment has been prepared by Sandy Brown to determine the prevailing noise climate and likely noise levels resulting from the completed development, which have been used to undertake an assessment of the acoustic requirements for the external building fabric.

5.57 The report concludes that the use of high performance acoustic double glazing in combination with high performance mechanical ventilation will ensure that the relevant internal noise limits in bedrooms and living spaces will be achieved. On the sawtooth façade which faces the railway line, the sound reduction provided by the winter gardens has been taken into account to determine the necessary performances.

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- 5.58 In addition the Noise Impact Assessment assesses the likely noise and vibration impact arising on the site as a result of the neighbouring railway. The report concludes that the tactile vibration and structure borne noise are not considered to be an issue at the site.
- 5.59 Overall the noise level and vibration level and the noise generated by the scheme proposal is considered to be acceptable in principle.
- 5.60 A desk based assessment has been carried out by RWDI to assess the likely wind conditions around the proposal. The Wind Microclimate Impact Report is based upon meteorological conditions for London adjusted to the site and wind tunnel testing. The report looks at both the wind impact in relation to the existing condition, as well as a cumulative assessment of the proposed development and 101 Camley Street coming forwards.
- 5.61 The assessment concludes that for the existing condition, the majority of the ground level receptors experienced a wind environment that was either suitable for or calmer than the targeted conditions. Mitigation measures (e.g. screening or recessing entranceways) are advised in relation to a receptor at 108 Camley Street which is affected by the proposed passageway through the site which is effected as a result of the orientation of the 102 Camley Street building.
- 5.62 In relation to the cumulative position, the majority of receptors experienced suitable for the targeted conditions, however there are some ground level receptors at the terrace amenity space where the results were one category windier than desired. Strong winds were identified at some points, including the receptor at 108 Camley Street, however this small exceedance is considered to be acceptable subject to mitigation measures as recommended in the report.
- 5.63 An Air Quality Assessment has been undertaken by Arup due to the poor air quality within this part of the Borough. Arup conclude that the construction effects of the proposed development will have a negligible effect from the dust generating activities on site.
- 5.64 Arup consider that the impact of emissions from both stationary and moving trains would not have a significant impact for the proposed residential and commercial use.
- 5.65 In relation to the operational phase, Arup conclude that the likely impacts arising from the exhaust emissions associated with vehicles travelling to and from the site are likely to have a negligible impact. In addition, the proposed CHP is identified to have a negligible impact in relation to the surrounding area.

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**v. *Design and conservation***

- 5.66 A full evaluation of the design and the proposed development and its relationship to the surrounding urban context is set out within the Design and Access Statement and the Townscape Heritage and Visual Impact Assessment which have been submitted as part of the planning application.
- 5.67 The Government attaches great importance to the design of the built environment. The NPPF states that planning decisions should not attempt to impose architectural styles and should not stifle innovation, originality or initiative (paragraph 60). The NPPF recognises that although visual appearance and the architecture of individual buildings are very important factors, high quality design should also address the connections between people and places and the integration of new development into the natural, built and historic environment (paragraph 61).
- 5.68 In determining planning applications, the NPPF directs that great weight should be given to outstanding or innovative designs which raise the standard of design more generally in the area (paragraph 63). The London Plan Policy 3.5 also advocates quality and design in housing developments.
- 5.69 Camden's Core Strategy Policy CS14 seeks to promote high quality places and conserve heritage assets. The policy requires proposals to be of the highest standard of design that respects local context and character. Development Policy DP24 seeks to secure high quality design.
- 5.70 The development proposes a very high quality design which will maximise the potential of the site whilst ensuring that there is no adverse impact on the varying character of the surrounding area. The context of the site has directly influenced the scheme design in particular the emerging townscape arising as a result of consented developments at Kings Cross and 103 Camley Street, and the pipeline redevelopment of 101 Camley Street.
- 5.71 The building is located within the viewing corridor for the protected vista from Parliament Hill to St Paul's Cathedral and therefore consideration has been given regarding the appearance of the site from Parliament Hill. The height of the proposed building is below the viewing place of the protected vista.
- 5.72 The Townscape, Heritage and Visual Impact Assessment (TVIA) prepared by Kevin Murphy and AVR London has identified that it is clear that the proposed developments at 101, 102 and 103 Camley Street are all below the Threshold Plane, and that the upper parts of the proposed development at 102 Camley Street will be

- beneath the base of the drum and the towers of St Paul's. Overall there is no adverse impact on the protected vista as a result of the proposed development.
- 5.73 Particular care and attention has been given to the bulk, height and massing of the scheme to avoid any adverse impact on neighbouring properties. It is considered that the proposed design solution is of an appropriate scale and massing.
- 5.74 The application proposal is considered to be of a very high standard of design and architectural quality which will make a significant contribution to improving the physical quality of the site and the surrounding railway hinterland. The proposed design contributes positively to the Regent's Canal and the surrounding area by opening up access to the towpath.
- 5.75 The design of the proposed scheme has responded to consultation feedback received from the Council's urban design officer, the GLA design officer and public comments.
- 5.76 Significant consideration has been given to how to incorporate the Council's wider aspirations for the future redevelopment of the northern Camley Street sites and the connectivity between 102 Camley Street and land to the north. As a result of dialogue with the Council a pedestrian north south link has been provided at ground level to future proof the scheme design to enable connectivity with potential future development of 104 Camley Street and beyond.
- 5.77 At street level the scheme provides visually interesting double height glass frontages to the light industrial and employment units, as well as an area of public amenity space. A concierge for the residential apartments will be provided with an entrance off the walkway through the northern block. It is therefore considered that the scheme design will encourage the movement of workers, residents and visitors through the site, thereby activating the frontage.
- 5.78 In accordance with Development Policy DP24, high quality materials will be used to provide visually interesting frontages with subtle brickwork detailing. The Design and Access Statement submitted as part of this application provides more detail regarding precedent materials and finishes.
- 5.79 The sawtooth design to the eastern elevation adds architectural interest to the building and enables the provision of dual aspect east and south facing winter gardens. The winter gardens will provide easterly and southerly views towards the railway and down towards St Pancras International Station.
- 5.80 The TVIA concludes that the proposed development at 102 Camley Street will serve as a marker of a new gateway to Camley Street. The scheme is considered to enhance

views in the area, the setting of the listed and locally listed structures in the vicinity and the character and appearance of the Regent's Canal and King's Cross Conservation Areas.

- 5.81 Overall the proposals are considered to be consistent with the design aims of the development plan and relevant urban design and historic built environment guidance.

**vi. Landscape, biodiversity and playspace**

- 5.82 London Plan Policy 7.5 seeks to ensure that proposed developments make the public realm comprehensible at a human scale, using gateways and focal points. Landscape treatment, street furniture and infrastructure should be of the highest quality.
- 5.83 Core Strategy Policy CS15 states that where development proposals create additional demand for open space, opportunities should be secured for improvements to open spaces including the facilities provided for play, access arrangements and connections between spaces. The policy encourages biodiversity in the borough through the provision of biodiverse green or brown roofs and new trees and vegetation.
- 5.84 Core Strategy Policy CS15 aims to protect and improve open spaces and encourage biodiversity by creating the provision of new or enhanced habitat through green walls, roofs etc and by protecting trees and promoting the provision of new trees and vegetation, including additional street trees.
- 5.85 Development Policy DP24 seeks to ensure the developments consider existing natural features, provision of appropriate hard and soft landscaping including boundary treatments and the provision of appropriate amenity space.
- 5.86 An Arboricultural Assessment has been submitted as part of this planning application which concludes that existing vegetation on the site is of a poor quality.
- 5.87 Core Strategy CS15 also states that the Council will preserve and enhance the Regent's Canal by, inter alia, balancing the differing demands on the Canal, its towpath and adjoining land, implementing opportunities to make the canal a safer place and working with others to improve the Canal and the towpath. A key element of the proposed scheme is opening up of the Regent's Canal towpath including widening this and providing a space to 'pause' between the bridges which cross the canal and currently create a hostile environment. The proposals will form part of the string of pearls concept of creating a series of spaces alongside the canal where the public can pause, leave the canal towpath and have visual security.

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- 5.88 The treatment of the Canal and its towpath has been a large influence in the development of the scheme design and it is considered that the development promotes a safer, more inviting environment in which to use and visit. Discussions have been held with Canal and Rivers Trust in order to ensure that the scheme proposals are consistent with their aspirations for the Regent's Canal.
- 5.89 The proposed development at 102 Camley Street will provide 200 sqm of green roof garden space on Level 9 which comprises 150 sqm of private amenity space and 50 sqm for children's playspace. In addition, the proposals will enhance the vegetation and planting both along the towpath and Camley Street itself. The scheme provides a courtyard area of public open space which will enhance the biodiversity on the site. The scheme provides for approximately 50% of the site area to be publicly accessible which is a very high proportion of the total site area.
- 5.90 This courtyard area complies with Development Policy DP31 seeks to secure improvements to public open space which supports development which is likely to lead to an increased use of public open space. The Design and Access Statement demonstrates that the scheme will provide a safe, usable public space for residents, workers and visitors to the site, which is a stark contrast to the existing harsh urban landscape of the current site and its environs.
- 5.91 The proposed landscape and biodiversity enhancements at 102 Camley Street have been designed to provide a connection between the Camley Street gateway sites to achieve a coordinated landscaping solution for the public realm between 101, 102 and 103 Camley Street. This is outlined in further detail in the Design and Access Statement.
- 5.92 The proposed development includes the provision of a new publically accessible courtyard space which provides 280 sqm of open space. This space has been designed by Turkington Martin Landscape Architects to provide a combination of public amenity (230 sqm) and childrens playable space (50sqm). Further details of the proposed amenity provision can be found in the Design and Access Statement, (Section 3.8).
- 5.93 In addition significant enhancements to the amenity space adjoining the towpath are proposed. This amenity space provides 40sqm of public open space. The requirement to provide a cycle ramp on site has occupied a significant proportion of the land available to provide amenity space, however, overall approximately 50% of the site area is provided as publically accessible space, and only 50% of the site area comprises buildings.

- 5.94 In relation to residential amenity, all of the residential units have access to their own private balconies or winter gardens, all of which meet the minimum space standards set by the Mayor and total 1,545 sqm.
- 5.95 The Design and Access Statement Section 2.10 identifies that there are approximately 21 open spaces located within walking distance from 102 Camley Street. Access to the amenity facilities provided at Kings Cross from the site will be significantly improved as a result of the provision of the cycle route and steps to the towpath.
- 5.96 Due to the requirement to provide a cycle ramp on site, the amount of open space which can feasibly be provided on site is restricted. Considered holistically we consider that there is sufficient open space within the local area to meet the needs arising for open space provision. In addition to this it is proposed that the applicant will make a financial contribution to open space, and would like to explore options with the Council about making a contribution towards the St Pancras Gardens (see Section 7 for further detail).
- 5.97 In terms of ecology the Ecological Assessment identifies that there is no reason to suggest that any ecological designations, habitats of nature conservation interest or any protected species will be adversely affected by the proposals. The majority of the site is dominated by buildings and existing vegetation is limited and unlikely to provide any significant ecological value. There was no evidence of any protected, rare or notable faunal species on site.
- 5.98 Overall it is considered that the development proposals are in accordance with the aims of the LDF policies CS15, DP24 and DP31.

**vii. Energy and sustainability**

- 5.99 Core Strategy Policy CS13 and Development Policy DP22 promote sustainable design and construction in all new developments across Camden. Care has been taken to ensure the design of the scheme has evolved to incorporate sustainable credentials.
- 5.100 An Energy Strategy has been prepared by McBains Cooper in relation to the proposed development. In accordance with the London Plan and Mayors Sustainable Design and Construction SPG (2014), the regulated carbon dioxide emissions of the proposed scheme have been reduced by over 40% from a Part L 2010 compliant baseline by maximising the contribution of be lean, be clean and be green steps of the Mayor Energy Hierarchy.
- 5.101 The proposals achieve a 5% reduction in carbon emissions through developing a highlight efficient building envelope in terms of, inter alia, u-values and air tightness.

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It is proposed that a Combined Heat and Power (CHP) unit will be installed as part of the development as a result of a lack of suitable district heat networks to connect to. The proposed CHP unit will provide a further 36% reduction in carbon dioxide emissions.

- 5.102 To further reduce the carbon dioxide emissions, an assessment of potential low and zero carbon technologies has been undertaken which provide a further 2% reduction in carbon emissions.
- 5.103 Overall the proposed Energy Strategy is compliant with GLA guidance and is considered to be acceptable in principle.
- 5.104 McBains Cooper has also prepared a Sustainability Statement in relation to the proposed development which provides detailed BREEAM and Code for Sustainable Homes (CfSH) assessments.
- 5.105 The report concludes that the scheme will achieve BREEAM New Construction 2011 rating 'excellent' for the B1 employment element of the scheme, achieving a total score of 73%. This BREEAM rating is over and above the requirement required under Camden Development Policy DP22, which requires developments to achieve BREEAM 'very good' rating up to 2016.
- 5.106 The proposed residential element of the scheme will achieve Code for Sustainable Homes Level 4, which is also in accordance with the London Plan and Camden Development Plan standards.
- 5.107 Overall the proposed development at 102 Camley Street achieves excellent levels of sustainability and is considered to be in accordance with planning policy requirements.

***viii. Transport, servicing and parking***

- 5.108 A full evaluation of the proposed development in terms of traffic and transport is provided within the Transport Assessment prepared by TTP. The site is very well served by public transport and provides an opportunity for a sustainable development in transport terms.
- 5.109 A manual PTAL assessment has been undertaken by TTP which concludes that the site has a PTAL rating of 6a as a result of recent London Underground station entrances being completed at Kings Cross and St Pancras stations. Overall the site is considered to have excellent levels of accessibility.

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- 5.110 The proposed development will be car free, with the exception of two disabled car parking spaces located along the northern edge of the site, accessed from Camley Street. The predominant method of travel by students, residents and workers to and from the development is likely to be by walking or cycling.
- 5.111 The scheme will provide 253 cycle parking spaces which will be located in sheltered and secure areas. This is in excess of both the GLA and the Camden minimum cycle parking standards and is in accordance with Code for Sustainable Homes Level 4 and BREEAM standards.
- 5.112 Overall the scheme is considered to be in accordance with Core Strategy Policy CS11 and Development Policy DP16 which promotes sustainable and efficient travel through improved public spaces and pedestrian links which continuing to provide facilities for cyclists. Overall the proposed development will significantly enhance cycle routes to and from the Regent's Canal up to street level at Camley Street and to the wider cycle network. The improved access from the site to towpath level provides a significant enhancement to the accessibility of the site to the neighbouring Kings Cross development.
- 5.113 The scheme will therefore promote walking, cycling and public transport use in accordance with Development Policy DP17. The proposed development scheme is not dependent on travel by public motor vehicles.
- 5.114 The proposals are also in accordance with Policy DP18 which seeks to limit the availability of car parking spaces and ensure that development provides the minimum necessary car parking provision. As mentioned above the development is only seeking to provide 2 disabled car parking spaces and therefore the scheme is considered to comply with this policy requirement.
- 5.115 Refuse collection will take place on site at the northern part of the development. Off street servicing will be available for small to medium sized vehicles, which will be able to access the site from Camley Street. Deliveries from larger vehicles would be accommodated on street at Camley Street.
- 5.116 In addition to the transport measures highlighted above, as part of the landscaping and design proposals to enhance the shared public realm between the 101, 102 and 103 Camley Street sites, the proposal at 102 Camley Street seeks to provide a shared surface for the section of highway which between 102 and 103 Camley Street to provide an enhanced visual linkage between these sites. The concept of providing a shared surface in this location has been discussed and agreed in principle with the Council's highways department.

5.117 It was agreed with the Council's highways officer that a Construction Management Plan relating to the proposed development will be secured through a S106 Agreement. According to the Transport Assessment prepared by TTP outlines a summary of the key principles of the future Construction Management Plan.

***ix. Accessibility***

5.118 London Plan Policy 3.8 and Camden Development Policy DP6 refers to lifetime homes and wheelchair housing and requires that all housing development should be built to Lifetime Homes standard. In addition 10% of homes developed should either meet wheelchair housing standards or be easily adapted to them. As stated early in this section, the development proposals include 10% of units to meet Camden wheelchair housing standards. Further details regarding the scheme accessibility can be found in the Design and Access Statement.

5.119 Policy DP29 and CS14 promote achieving the highest standards of access in all buildings and places, requires schemes to be designed to be inclusive and accessible, and seeks to promote fair access and remove barriers that prevent people from accessing facilities and opportunities.

5.120 The development proposal has been designed to ensure that the building and space around it is inclusive and accessible to all through the provision of two disabled car parking spaces. Overall accessibility to and through the site will be greatly enhanced as a result of the provision of the cycle ramp. Step free access from grade to canal towpath level will be provided at 101 and 103 Camley as part of development proposals for a new pedestrian bridge across the Regents Canal joining these two sites and Camley Street to Granary Street and St Pancras Way. It has been agreed in principle with Camden and the GLA that an additional platform lift at 102 Camley Street is not required in this instance as a result of the significant accessibility enhancements proposed at 101 and 103 Camley Street.

5.121 It is therefore considered that the proposals are consistent with the aims of the London Plan and LDF Policies CS14, DP6 and DP29.

## 6.0 DRAFT HEADS OF TERMS CONTENTS FOR SECTION 106 AGREEMENT AND MAYORAL COMMUNITY INFRASTRUCTURE LEVY

### Section 106 Obligations

6.1 The Applicant proposes to commit to the following provisions by means of S106 Agreement:

- Car free, permit free housing (excluding the on site disabled spaces)
- Code of Construction Practice
- Construction Management Plan
- Green Travel Plan
- Service Management Plan
- Environmental Sustainability Measures Plan
- Local business support and procurement strategy

6.2 In addition, the Applicant proposed to make financial contributions as follows:

- Community facilities contribution totalling £285,180
- Provision of education totalling £404,939
- Public Open Space contribution towards St Pancras Gardens £210,802
- Canal Bridge between 101 and 103 Camley Street £200,000
- Environmental contribution £50,000
- Highways (public realm and pedestrian crossing) £17,000
- **TOTAL = £1,167,921**

6.3 The development will also provide inherent planning benefits and benefits in kind as follows:

- Improvements to access the canal towpath, including the creation of a new cycle ramp as well as the creation of a new staircase from ground to towpath level and under bridge lighting.
- Construction costs associated with the creation of landscaping to new publically accessible open space within the courtyard of the site.
- **TOTAL INHERENT BENEFITS = £500,000**

6.4 As identified above, the proposed development offers a significant planning benefits package both in the form of direct financial contributions, and in the substantial inherent benefits provided as part of the development scheme. This results in a combined total of approximately £1,667,921.

- 6.5 The Heads of Terms will be agreed with LBC in conformity with national, regional and local guidance and policy.

**Mayor's Community Infrastructure Levy**

- 6.6 The Mayor of London's Community Infrastructure Levy (CIL) is a tariff chargeable by the GLA on new development following 1st April 2012. The Mayoral CIL is chargeable in Camden at £50 per sqm (GIA).
- 6.7 The existing warehouse on the site totals 1,008 sqm (GIA). The proposed development comprises 1,320 sqm of B1 space and 14,707 sqm of residential floorspace (including ancillary residential space), which equates to a total of 16,027 sqm (GIA).
- 6.8 This scheme results in a chargeable building floorspace of 15,019 sqm (GIA) given that the existing floorspace meets the lawful occupancy test. A deduction for social housing relief applies to the 3,628 sqm GIA proposed affordable housing, and consequently the total payment due will be approximately £569,595. A CIL additional information form has been completed and forms part of this application.
- 6.9 It has been agreed with TfL during the GLA pre-application discussions that the site falls outside the Mayoral Crossrail charging area.

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## 7.0 CONCLUSIONS

- 7.1 The application provides an opportunity to develop a vibrant new mixed use scheme to bring the site in to beneficial economic use for diverse and flexible employment uses which will benefit the local community by securing important economic, social and environmental benefits whilst achieving the essential objectives of sustainability.
- 7.2 The provision of flexible B1 employment space will add to the employment generating floorspace in the borough, providing an alternative offer to the large office floorplate accommodation currently being built at Kings Cross. The proposed business units will provide follow on space for the Incubator units currently under construction at 103 Camley Street. The provision of a proportion of the proposed employment space will encourage and facilitate SME's to continue to grow and develop from the incubator spaces. The proposals will help to reinforce the successful enterprise space between promoted at 103 Camley Street and will continue to foster links between the local business and resident community.
- 7.3 The provision of residential uses as part of the mixed use redevelopment of the site, including on site affordable housing, will seek to ensure the scheme proposals positively contribute towards optimising the potential of the site to contribute towards meeting the Council's housing targets. The proposed residential unit mix has been agreed in principal with the London Borough of Camden Housing Officer. The proposed level of affordable housing provided is the maximum viable amount in accordance with the submitted viability assessment.
- 7.4 The proposed development has been informed following a series of meetings, discussions and public exhibitions with officers from the London Borough of Camden, the Greater London Authority, Canal and Rivers Trust, local groups, local residents and members. During this process there have been alterations to the scheme design in terms of building height and linkages.
- 7.5 Glenn Howells Architects have designed a building of very high quality architectural quality which relates positively and sensitively to the setting of the site and the emerging context of Kings Cross and the Camley Street gateway sites. The development of 102 Camley Street has been developed to ensure that the gateway sites provide an overall cohesive and legible enhancement to the public realm. The Design and Access Statement outlines the proposals in further detail.
- 7.6 The scheme has been designed to meet sustainability requirements at national, regional and local level. The building will combine energy efficient measures, CHP and photovoltaic cells to minimise carbon emissions. The proposed employment space

will meet BREEAM 'excellent' and the residential accommodation will meet Code for Sustainable Homes level 4.

- 7.7 The Transport Assessment demonstrates that the site has excellent levels of public accessibility to meet the scale of the development proposed. The proposed cycle and pedestrian enhancements proposed as part of the development will further enhance the connectivity of the site with Kings Cross. The development will be car free and permit free, excluding the two disabled car parking spaces provided on site.
- 7.8 Overall the development proposals for 102 Camley Street is considered to be fully compliant with planning policies at the national, regional and local level. The proposal will provide not only significant housing of which affordable housing forms part but importantly flexible employment floorspace aimed at SME's which will help Camden's economy and employment continue to thrive by securing a viable mixed use development.

## **APPENDIX 1**

### **GLA Pre-application Feedback**

GREATER **LONDON** AUTHORITY  
Development, Enterprise and Environment

**Chris Beard**  
DP9  
100 Pall Mall  
LONDON SW1Y 5NQ

**Our ref:** D&P/3417  
**Date:** 3 June 2014

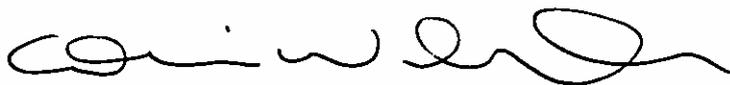
Dear Mr. Beard,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008  
102 Camley Street, London NW1 0PF**

Further to the pre-planning application meeting held on 20 May 2014, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,



**Colin Wilson**  
Senior Manager – Development & Projects

cc Alex Williams, TfL



## 102 Camley Street, London, NW1 0PF

in the London Borough of Camden

### The proposal

Demolition of existing buildings on the site, and the erection of a mixed use development comprising 1,125 sq.m of commercial/employment floorspace, 162 residential units and public realm works to include a new access to Regent's Canal towpath

### The applicant

The applicant is **Regent Renewal Ltd**, and the architect is **Glenn Howells Architects**.

### Context

1 On 16 April 2014 a request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 20 May 2014 a pre-planning application meeting was held at City Hall with the following attendees:

GLA -	Natalie Gentry	Senior Strategic Planner (case officer)
	James Keogh	Strategic Planner (urban design)
	Sarah Considine	Principal Strategic Planner
	Neil Smith	Principal Access Advisor
	Jonathan Williams	GLA Energy
	Mark Day	Transport for London (TfL)
Applicant -	Chris Shaw	Shaw Corporation
	Glenn Howells	Glenn Howells Architects
	Will Poole	Glenn Howells Architects
	Sophia Ceneda	Glenn Howells Architects
	George Steele	TPP
	Anthony Coumidis	McBains Cooper
	Chris Beard	DP9
	Rachel Crick	DP9
Ian Turkington	Turkington Martin	
Kevin Murphy	KM Heritage	

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application. Please note that the quality of the advice you receive will be dependent upon the documentation that you let us have in advance of the meeting.

3 This advice has been sent within ten working days of the pre-planning application meeting, in accordance with the GLA's pre-application service standards.

## **Site description**

4 The site is 0.25 hectares in size and roughly rectangular in shape. It has a frontage onto Camley Street to the west and adjoins Network Rail and Channel Tunnel Rail Link (CTRL) rail lines to the east and 104 Camley Street to the north (currently occupied by a Hewlett Packard office and warehouse). Camley Street bridges over Regent's Canal which is located to the south of the site at a lower level. The site is currently occupied by a 1,008 sq.m Class B8 warehouse that is occupied by Marigold foods, who are relocating to a purpose built refrigeration unit in Tottenham.

5 The site is located just outside of the Kings Cross-St. Pancras Opportunity Area as set out in London Plan policy 2.15 and Map 2.4, for which Camden have adopted a planning and development brief. It is also close to the boundary of the locally designated Regent's Canal and Kings Cross Conservation Areas and falls within protected vista 2A.1 from Parliament Hill to St. Paul's in the London View Management Framework (LVMF).

6 Camley Street is a borough road, and the nearest part of the Transport for London Road Network (TLRN) is the A400 Camden Street about 450m to the west. No bus services are accessible from the site within the maximum recommended walking distance of 400m, although four services are available within the maximum Public Transport Accessibility Level (PTAL) walk distance of 640m to the south of the site at the junction of Camley Street with Goods Way.

7 Although the station platforms are further to the south, an access to Kings Cross-St Pancras International rail and London Underground station is located 780m to the south of the site, providing access to frequent national rail services and London Underground services on the Victoria, Northern, Piccadilly, Circle, Metropolitan and Hammersmith & City lines. As such, although under a strict application of the methodology the site records a moderate public transport accessibility level (PTAL) of three (out of a range from one to six), the perceived accessibility may be much greater. Calculating the PTAL for the site using the distance to the station entrance rather than the platforms would result in the maximum level of 6a.

## **Planning history**

8 Although there is no relevant planning history on the site, it forms part of a collection of three sites (101, 102 and 103 Camley Street), which although under separate ownership, are being promoted for comprehensive mixed use redevelopment by different developers over a similar timescale, and which share common regeneration objectives. 103 Camley Street received planning permission in April 2012 for a mixed use development of up to twelve storeys, to contain 307 student accommodation units, forty residential units, incubator business space and two retail units, together with public realm improvements. This application was referred to the Mayor, who at stage one, advised Camden Council that the proposals were broadly acceptable in strategic terms, although further information was required on the incubator business space, public realm and canal frontage, inclusive design, energy and transport report reference: PDU/2733/01). At stage two, these issues had been addressed, and the Mayor advised Camden Council that he was content for them to determine the case itself (report reference: PDU/2733/02). The planning permission was subsequently issued, and this development is now at an advanced stage on site.

9 A pre-application meeting was held on 29 May 2014 for the site at 101 Camley Street to discuss a mixed use scheme comprising 128 residential units and 1,580 sq.m of commercial/employment floorspace.

## Details of the proposal

10 The proposals seek to demolish the existing buildings and redevelop the site to provide a mixed use development comprising 1,125 sq.m of flexible commercial/employment floorspace on the lower floors and approximately 162 residential units (14,125 sq.m) on the upper floors with on-site affordable housing, together with a circa 1,000 sq.m basement for plant/storage and communal amenity space. The proposals also include the provision of a new route from the site down to the Regent's Canal towpath that is currently inaccessible from Camley Street, including a cycle ramp/step free access, and public realm works to widen and improve the towpath. The building would be between nine and eleven storeys with a maximum height of 40.6 metres.

## Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Land use principles London Plan;
- Housing *London Plan; Housing SPG; Draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Affordable housing *London Plan; Housing SPG, Draft Revised Housing Strategy;*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context Draft SPG*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG; Draft Accessible London SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change and Energy Strategy; Mayor's Water Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy.*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Camden Core Strategy; the 2010 Camden Development Policies Development Plan Document (DPD); the Camden Site Allocations Local Development Document (adopted September 2013), and; the London Plan (with 2013 Alterations).

13 The following are also relevant material considerations:

- The Further Alterations to the London Plan (January 2014 consultation draft)
- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.

## Summary of meeting discussion

14 Following a presentation of the applicant's proposals for the site, meeting discussions covered strategic issues with respect to; the principle of the development; housing and affordable housing; urban design and public realm, inclusive access, energy and; transport. Advice with respect to the main strategic issues is provided under the associated sections below.

## Principle of the development

15 As set out in paragraph four, the site is occupied by a Class B8 employment use, but is due to become vacant when the current occupiers relocate. Although the site is surrounded by other similar type employment warehouses, neither the site nor those surrounding it are identified in the London Plan as a

Strategic Industrial Location (SIL), and are not within Camden Council's locally designated Industry Area as set out in the Core Strategy. Camden as a borough however, has one of the lowest stocks of industrial and warehousing space among London boroughs, and London Plan Policy 4.4 places Camden within the restricted transfer category for the release of surplus industrial land. The Council's Development Policy DP13 also resists the loss of existing employment floorspace outside the main Industry Area, unless it can be demonstrated that continued employment use is unviable or unsuitable.

16 The site is also located just outside of the boundary of the Kings Cross-St Pancras Opportunity Area (Growth Area in the Council's Core Strategy). It is therefore in an optimal location to further support and deliver the regeneration objectives for the Kings Cross-St Pancras area, which has the potential to deliver up to 25,000 new jobs and a minimum of 1,900 new homes. In delivering this potential capacity, Table A1.1 in the London Plan recognises the vital importance of integrating the major rail termini, underground station and brownfield sites with the regeneration of neighbourhoods in the wider area.

17 London Plan policy 3.3 seeks to increase London's supply of housing and in doing so sets borough housing targets. The Further Alterations to the London Plan (consultation draft, January 2014) proposes to set Camden's target at 889 additional homes per year between 2015 and 2025, and the proposals will contribute towards this target, which is strongly supported in strategic terms.

18 The proposals include approximately 1,125 sq.m of commercial/employment floorspace, which represents an uplift in employment floorspace currently provided on the site (about 1,008 sq.m). The applicant states that the existing warehouse provides a low job density due to an inefficient layout, and this will be significantly improved in the new development. The employment floorspace also includes some B1 office provision and studio business spaces to support small and medium sized enterprises (SME) and start-up businesses in connection with the incubator space being developed at 103 Camley Street in collaboration with University College London (UCL). At the meeting, the applicant confirmed that flexible tenures and rent-free periods have been discussed with the Council's business team, and this is supported. The applicant also confirmed that the floorspace has been designed to be flexible, allowing the opportunity for a large end-user to combine the units if necessary.

19 Notwithstanding the need to re-provide a sufficient quantum of employment floorspace on this site, it is also essential to the success of any future development that the provision of employment floorspace is meaningful, and deliverable. As detailed above, whilst it is understood that the applicant is in discussion with the Council's business team, at present, little information has been provided regarding the delivery and management of the proposed units. In the application, the applicant should provide further details regarding how the units will be delivered, marketed, and managed, including any measures to assist future tenants, such as extent of fit-out, and use of subsidised rents/reduced service charge periods. The strategy for delivery should be secured by the Council.

20 Taking all of these factors into account, the quantum, type and nature of the employment floorspace proposed are strongly supported in strategic terms. The proposals will re-provide a greater quantum of employment floorspace with a more flexible layout and efficient job density, which has the ability to both support SME and start-up business and be flexible to accommodate a larger end-user company if necessary. The mixed use nature of the proposals with residential units that makes a more efficient use of this brownfield site adjacent to the Kings Cross-St Pancras Opportunity Area is also strongly supported.

## **Housing**

21 The proposals will provide approximately 162 residential units and the table below provides an indicative breakdown of unit types and tenures by percentage of the total number.

<b>Unit type</b>	<b>Private</b>	<b>Affordable rent</b>	<b>Shared ownership</b>
<b>Studio</b>	3%	0	0
<b>One bed</b>	33%	24%	44%
<b>Two bed</b>	38%	24%	56%
<b>Three bed</b>	26%	42%	0%
<b>Four bed</b>	0	10%	0%

**Table 1: Draft unit schedule**

22 GLA officers will require the final breakdown of unit types in the future planning application together with evidence that the housing mix meets local need following discussions with Camden's housing team.

### Affordable housing

23 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units, taking into account; the need to encourage rather than restrain development; the housing needs in particular locations; mixed and balanced communities, and; the specific circumstances of individual sites. The tenure split suggested by the London Plan is 60% social/affordable rent and 40% shared ownership. The NPPF, the Mayor's Housing SPG and the London Plan clearly state that to maximise affordable housing in London and provide a more diverse offer for the range of people requiring an affordable home, the affordable rent product should be utilised in the affordable housing offer in residential developments.

24 The Council's Core Strategy has a target of 50% affordable housing borough-wide and seeks to achieve the maximum provision on a site-by-site basis on a sliding scale of 10% up to 50% depending on the scale of the individual scheme. Camden's target tenure split is 60% social rented and 40% intermediate housing.

25 In the pre-application meeting, whilst it was confirmed that viability work continues, it is indicated that the scheme will include an overall provision of 25% affordable housing, with a tenure split of 57% affordable rent and 43% shared ownership. Whilst this proportion of affordable housing is welcomed, in order to comply with the London Plan Policies noted above, the applicant is required to undertake a viability appraisal with financial modelling to demonstrate that this is indeed the maximum reasonable amount of affordable housing that the development can provide. This will need to be independently verified by the Council or their appointed consultant and supplied to the GLA, together with a copy of the Council's independent report. GLA officers will expect the independent assessment to scrutinise the development finances to understand the financial constraints inputted into the toolkit and how this has impacted on affordable housing provision.

26 The indicative tenure split broadly complies with the London Plan, and in accordance with the London Plan and NPPF, the proposal includes affordable rent units which is supported.

27 GLA officers need to understand the applicants' timescales for delivery. If, due to the phasing of the scheme, the units will not be delivered in the short-term, officers would support the inclusion of a financial review mechanism within the section 106 agreement. This should be designed to allow any additional financial surplus to be captured prior to implementation/between phases, that may be generated by uplift in residential sales values. Such a mechanism would need to be designed so as to ensure an appropriate proportion of any financial surplus would be awarded to the Council, and ring-fenced for the delivery of additional affordable housing units.

## Mix of units

28 London Plan Policy 3.11 accords priority to affordable family housing in residential development. In addition, London Plan Policy 3.8 and the Mayor's Housing SPG promote housing choice and seek a balanced mix of unit sizes in new developments.

29 The revised pre-application document supplied at the meeting includes an indicative breakdown of units, as summarised in Table 1. This shows that the scheme includes a very good proportion of family units (those with three or more bedrooms), with 53% of the affordable units being suitable for families, which is strongly supported. At application stage, the applicant will need to include full details of the proposed housing mix.

30 London Plan Policy 3.9 promotes mixed and balanced communities which can be achieved by providing a mix of tenures across the development and ensuring that the scheme is tenure blind. The indicative floor plans show that the affordable rent units would be located in the northern block on the first, second and third floors, with the shared ownership units dispersed amongst the private sale units through the first to eighth floors. Given the relatively small scale of the site and the 'L' shaped form of the building this arrangement is acceptable, although the applicant should take note of the comment in paragraph 39 to improve the location of the entrance into the affordable units, as discussed at the meeting.

## Residential quality

31 London Plan Policy 3.5 and Table 3.3 set out requirements for the quality and design of housing developments including minimum space standards for new development, and all units in the proposal will need to meet these standards.

32 The indicative residential quality is generally high across the scheme. As part of the pre-application documents, the applicant has provided indicative layout plans for the building that demonstrate that all units have been designed to meet or exceed the internal space standards and include private balconies of at least 5 sq.m, which is supported. A 'saw-tooth' edge design has been included on the east facing elevation in order to maximise dual aspect units, which is welcomed, although there remains a number of single aspect north facing units on the northern block from the fourth through to the eighth floors. Despite the inclusion of dual aspect balconies to the middle north-facing two bed units within the affordable block, the Mayor's Housing SPG would still define these units as north facing, based on the 45 degree rule. Further work is needed to either remove these units and create larger corner units, or provide further information to demonstrate how daylight levels can be optimised. This may be achieved through repositioning and enlarging the window openings and maximising floor to ceiling heights. Generally the layout provides no more than eight units per core which is welcomed.

33 The design and access statement to support the future planning application should demonstrate how the units meet the 'Lifetime Homes' standards, and demonstrate how the scheme complies with the design guidance in Annex 1 of the Housing SPG. The applicant is also advised that the units should be provided within a minimum 2.6 metre floor-to-ceiling height.

34 As well as private balconies, rooftop communal gardens are proposed. The design and access statement to support the future planning application should detail how the amenity space needs for residents are to be met, and confirm the overall quantum of space provided to ensure compliance with the Mayor's Housing SPG.

## Density

35 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the density matrix in support of this policy. Based on the

characteristics of the location set out in paragraphs four to five, the site can be regarded as having an 'urban' setting, although given the proximity to Kings Cross a density closer to the 'central' setting density range could be appropriate. For an 'urban' setting, the matrix suggests a residential density in the region of 200-700 habitable rooms per hectare, and for a central setting, 650-1,100 habitable rooms per hectare. The Policy makes it clear that the matrix should not be applied mechanically, as other factors such as local context, residential quality and public realm will also determine the acceptable density range.

36 Whilst the applicant has not confirmed the density figure, based on a site area of 0.25 hectares and 162, the scheme would have a density of 648 units per hectare. This figure falls between the ranges of an 'urban' and 'central' setting, and is therefore likely to be accepted from a strategic perspective. As part of the planning submission, an assessment of the density using the appropriate calculation should be provided, which should be calculated based on the net residential site area in accordance with paragraph 1.3.47 of the Mayor's Housing SPG. Density figures should also be provided as both units per hectare and habitable rooms per hectare. If the final density figure falls within the upper range, the applicant should take note of paragraph 1.3.41 of the Mayor's Housing SPG regarding the impacts of high densities on local services and infrastructure.

### Children's play space

37 Children and young people need free, inclusive, accessible and safe spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The applicant should apply the methodology within the Mayor's Play and Informal Recreation SPG (2012), and based on the unit types and tenures, calculate the expected child population for the development and level of play and informal recreation space required.

38 At the meeting the applicant stated that the door-stop play facilities for the under-five age group are likely to be provided within the new public realm area at street level. As well as confirming the child yield from the development, the applicant must also include a play space strategy including a review of existing facilities in the immediate area for all age groups, and especially the older children. The applicant is should also demonstrate how inclusive play has been integrated into the site wide play strategy.

## **Urban design**

### Layout and ground floor activity

39 The provision of public open space on a spatially restricted site is welcomed. This will contribute positively to the new public realm being created at the other gateway sites at 101 and 103 Camley Street, which together will form a new sequence of public spaces alongside the emerging pedestrian route to the canal towpath. Whilst not physically connected to this site, the proposal for a new bridge across the canal connecting 101 and 103 Camley Street is a fundamental route that determines the success of this cluster of gateway sites. All sites must contribute to the delivery of this bridge, which will bring a meaningful connection of all of the pockets of public realm proposed across these sites and onto the towpath.

40 A north-south public route is proposed which provides potential to connect to future development to the north, and this is supported. The route will be well activated by entrances to commercial units and the proposed green space. However, as discussed at the meeting, the design development of the commercial unit at the north-west corner should have a high degree of transparency to create views through the building on the approach from the south, in order to optimise legibility and encourage pedestrian movement along the link.

41 The entrance to the affordable housing block on the north facing elevation adjacent to this route is currently isolated from the public realm. Whilst it is recognised that with future development potential of

the sites to the north, this entrance would be less isolated, in the interim, it is advised that the entrance is relocated to be accessed off the north-south link. This can be achieved by reconfiguring the layout of the refuse store to provide an entrance lobby adjacent to the private residential entrance. This will further enhance activity along the route and enable the access road to the north edge of the site to be used solely for servicing in the interim period prior to sites to the north coming forward for redevelopment.

42 The widening of the towpath along the southern edge of the building is welcomed in principle and responds to the objectives of London Plan Policy 7.24 which seeks to prioritise London's waterspaces and land alongside it for a range of purposes including recreation. However, as discussed at the meeting, further work is needed to ensure that the canal frontage forms a strong spatial relationship with the towpath, and contributes to the emerging sequence of public open spaces. The applicant referred to the potential to provide a cafe or other active use with dwell space in front of where the building meets the towpath. Whilst this is welcomed, the applicant should carefully consider the comments made in paragraph 16 regarding meaningful and viable commercial uses to avoid vacancies in this important space.

43 Further work is needed to demonstrate how cycle traffic joining the canal at the base of the ramp is clearly delineated from pedestrians moving along the canal from the west. Consideration should also be given to repositioning the steps further to the north to create a transition zone between steps and canal towpath.

#### Form, height and architecture

44 The design of the building responds to that of nos. 101 and 103 in order to form a refined and well-considered overall massing composition. The form and massing strategy is therefore supported and raises no strategic issues. The height of the building at G+11 storeys is acceptable in strategic terms, and is unlikely to have an impact on the protected vista from Parliament Hill towards St. Pauls (LVMF protected vista 2A.1). Nonetheless, as the applicant confirmed at the meeting, the strategic view together with a set of local views that have been agreed with the Council, need to be tested within a townscape and visual impact assessment that should accompany the planning application.

45 The architectural response is strongly supported. The refined materials palette of high quality brick clad bands and large expanses of glazing with deep reveals, form a simple horizontal emphasis that continues around the full perimeter of the building. The horizontal bands incorporate up-stands to recessed balconies, forming a degree of enclosure to flats and creating a clean lined aesthetic. The saw-tooth configuration along the east facade provides noise insulation from the railway and south facing winter gardens whilst successfully articulating and maintaining the predominant horizontal composition. This design approach is welcomed.

#### **Inclusive design**

46 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. Inclusive design principles if embedded into the development and design process from the outset help to ensure that everyone, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

47 There are some of areas where the current proposals need further consideration or further clarification is required. Further information can also be found in the consultation draft of the Accessible London SPG: <http://www.london.gov.uk/priorities/planning/consultations/draft-supplementary-planning-guidance-on-accessible-london>

#### Public realm

48 The design and access statement should show how disabled people access each of the entrances safely, including details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc, and how any level changes on the routes will be addressed.

49 Stepped access is proposed from street level to the canal towpath level, with an adjacent ramped route for cyclists. Due to the significant change in level it is understood that the ramp will not be able to accommodate suitable gradients in accordance with British Standard 8300:2009 +A1:2010. There is a potential conflict between cyclists and pedestrians at the base of the steps and the applicant needs to demonstrate how this will be mitigated. The adjacent development at 103 Camley Street includes a lift providing public access to the towpath and as such lift access within this site is not required. However, further consideration should be given to wayfinding and step-free access routes between the cluster of sites in Camley Street and the towpath.

50 It is unclear as to whether the mews/access road is to be provided as a shared surface or traditional streetscape. Paragraph 6.37 of the London Plan emphasises the importance of providing “safe and attractive routes that are easy to navigate”, and paragraph 6.38 explains that “walking issues should be addressed in development proposals, to ensure that walking is promoted and that street conditions, especially safety, security and accessibility for disabled people, are enhanced.” If any areas are to be provided as shared surface, the applicant should illustrate what design features will be incorporated to ensure that the areas are safe and usable for disabled people.

### Parking

51 Access to the site from public transport is not easy for people with limited ability due to the surrounding topography and location of public transport. Car parking for residents of the wheelchair accessible units should therefore be maximised. The design and access statement should demonstrate that adequate provision of blue badge parking bays has been made for the employees, visitors and residents to all the uses proposed, in line with London Plan Policies 3.8 and 6.13, and Table 6.2.

52 The provision and future management of the blue badge parking bays for the residents should be in line with the advice in the Lifetime Homes standards and the Wheelchair Housing Design Guide, and these bays should be located as close as possible to the relevant entrances/ cores. A parking management plan should identify how bays will be allocated to residents of the wheelchair accessible units across all tenures and should include a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and the provision reviewed. This ensures that the provision going forward equates to the demand from disabled residents and visitors, and also ensures that the bays are effectively enforced.

### Mobility scooter storage

53 Given the number of residential units and limited car parking proposed, the applicant should consider providing storage space and charging points for mobility scooters, in accordance with Paragraph 2.3.7 of the Mayor’s Housing SPG.

### Residential units

54 The applicant confirmed at the meeting that all residential units will be designed to the Lifetime Homes standard and that 10% will be wheelchair accessible or easily adaptable homes. This is welcomed and in line with London Plan Policy 3.8. The applicant should demonstrate in the design and access statement that the design of the residential units meet the sixteen Lifetime Home standards. Typical flat layouts and plans of the wheelchair accessible homes and the Lifetime Homes should be included in the design and access statement to illustrate the relevant features. It should be clear on the plans where the wheelchair accessible homes are located and how many there are. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people. If any of the units have access to only one lift then the design and access statement should identify the rapid repair strategies to be put in place.

### Marketing

55 The future marketing of the private wheelchair accessible homes should ensure that prospective purchasers are aware of the accessibility and adaptability of these units. Specific marketing to the disabled community and to older people's organisations can help to ensure that the people who will benefit from their accessible design are made aware of their existence.

## **Climate change**

56 Whilst the applicant has broadly followed the energy hierarchy and submitted sufficient information to understand the proposals as a whole, further revisions and information is required before the proposals can be considered acceptable and the carbon dioxide savings verified.

57 The applicant intends to submit the planning application prior to 6 July 2014 with the carbon figures set against Building Regulations Part L 2010, which is acceptable, provided the deadline for submission is met. The applicant is advised that after 6 July 2014, the figures should be calculated against a Part L 2013 baseline.

## **Energy efficiency standards**

58 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development, and both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by Building Regulations. Further information is however required on how the demand for cooling will be minimised (including information on glazing ratios and passive measures).

59 The development is estimated to achieve a reduction of 13 tonnes per annum (5%) in regulated carbon dioxide (CO<sub>2</sub>) emissions compared to a 2010 Building Regulations compliant development, and BRUKL sheets have been provided. Sample DER and TER sheets including efficiency measures alone should also be provided to support the savings claimed.

## **District heating**

60 The applicant has identified that the Kings Cross and Euston Road district heating networks are in the vicinity of the development. Evidence of correspondence with Metropolitan (the Kings Cross ESCo) has been provided confirming that, due to the presence of the canal, the opportunity for connecting the application site to their network is unviable.

61 Information has also been provided on the Euston Road district heating network proposals confirming that the development of this network will be focussed to the western side of Euston Station and that phasing up to 2029 does not envisage extension in the direction of the Camley Road development site. Based on this information, GLA officers accept that direct connection to this network is unlikely and so should not be investigated further at this stage.

62 The information provided identifies a standalone network proposed to the east of Euston Station, with an energy centre proposed at Phoenix Court. The applicant has confirmed that current proposals for the network reach a building approximately 450 metres to the south of the site. Evidence of correspondence with the developer of this network should be provided including information on expected timescales for delivery to identify whether there is an opportunity for direct connection. When discussing the potential for connection, the applicant should highlight that the cost of extension of the network could potentially be shared with other developments coming forward in the vicinity of the application site (for example, 101 Camley Street and other sites to the north).

63 Should connection to the Phoenix Court network not be possible, in line with the energy hierarchy the applicant should consider opportunities for connecting to nearby heat sources (for example, in adjacent development sites).

64 Nonetheless, the applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, and this is supported.

65 A site heat network linking all parts of the development is proposed and this is welcomed. The documentation confirms that the residential and non-domestic spaces will be connected to the network, and a drawing showing the network has been provided, which is acceptable. The site heat network will be supplied from a single energy centre, which will be 143 sq.m in size and will be located in the basement of the building, which is also acceptable.

#### Combined heat and power (CHP)

66 Connection to an external heat network should be prioritised, although if this is not possible, the applicant is proposing to install a 150 kWe gas fired CHP unit as the lead heat source for the site heat network. Whilst this appears acceptable in principle, further information should be provided on the feasibility assessment carried out to determine the viability of CHP, including monthly heat demand profiles and an indication of the proportion of demand to be met by the CHP. The applicant should supply enough information to justify the CHP size and carbon savings claimed, and information should also be provided on the electricity sales strategy and management arrangements proposed for the system.

67 A reduction in regulated CO<sub>2</sub> emissions of 81 tonnes per annum (31%) will be achieved through this second part of the energy hierarchy, although further information is required to verify these savings.

#### Renewable energy technologies

68 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install ground source heat pumps to provide the cooling for the office element (and potentially penthouses) and solar PV on the roof. A roof plan showing the proposed PV installation covering 75-100 sq.m has been provided, which is acceptable.

69 The applicant should clarify whether the central GSHP will also provide heat into the site heat network, and if so, further information should be provided on the co-efficient performance of the heat pump at the operating temperatures of the site heat network and the control strategy for the different heating plants.

70 A reduction in regulated CO<sub>2</sub> emissions of 4 tonnes per annum (3%) will be achieved through this element of the energy hierarchy.

#### Overall carbon savings

71 A reduction of 98 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 42%, which exceeds the target of Policy 5.2 of the London Plan. The comments above should however be addressed to verify the carbon savings expected and ensure compliance with the London Plan.

### **Transport**

72 TfL expect a transport assessment (TA) to be undertaken in accordance with the 2010 Best Practice Guidance, available at: <http://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

73 This should consider the impact of the development on all modes of transport at both the occupation and construction phases. This will enable TfL to get a better understanding of what measures (if any) may be required to mitigate the impact of the development on the transport network.

74 Tfl strongly encourage the applicant to work with Camden Council to improve lighting underneath the adjacent rail bridge and deliver the proposed footbridge across Regent's Canal in order to improve pedestrian links to King's Cross-St Pancras station and to bus services on Pancras Way. The future planning application should also be supported by a travel plan in accordance with Tfl's travel planning best practice guidance, available at:  
<http://www.lscp.org.uk/newwaytoplan/resources/file/Travel%20planning%20for%20new%20development%20in%20London.pdf>

75 The development is intended to be car free, with the exception of two blue badge car parking spaces. This level of provision is supported from a transport perspective although the applicant must ensure that the inclusive access comments made elsewhere in this report with regards blue badge parking are also addressed.

76 The applicant is encouraged to deliver cycle parking in accordance with the standards set out in the draft Further Alterations to the London Plan (2014), which requires different standards across a number of land uses. Tfl would also encourage the applicant to carefully consider the detailed design of the proposed link from the site to the canal towpath to ensure pedestrian and cycle conflict is minimised, although the principle of providing this link to increase permeability is welcomed.

## Conclusion

77 A mixed use development on this brownfield site just outside of the Kings Cross-St Pancras opportunity area, is strongly supported in strategic terms. The balance of land uses meets the objectives in the London Plan for employment land capacity and housing, and the proposals to provide flexible employment space for start-up business and SME's is welcomed. The design and layout of the scheme including the improvements proposed to the public realm and towpath access will create a sense of place with improved connections to the wider area which is supported. The form, massing and architectural treatment are supported, although the height needs to be tested in the protected vista from Parliament Hill to St. Pauls.

78 More information will also be required on unit types and tenures, affordable housing and viability, residential quality and public realm, transport, energy and inclusive access to ensure full compliance with the London Plan.

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