



**101 CAMLEY STREET**

**PLANNING STATEMENT**

**July 2014**

DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ

Tel: 020 7004 1700  
Fax: 020 7004 1790

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Prepared by:  
Rachel Crick  
Planner  
**DP9 Ltd**

Reviewed by:  
Chris Beard  
Director  
**DP9 Ltd**

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## 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Ltd (DP9) on behalf of Gateway Evolution Limited in support of a planning application for the redevelopment of the site known as 101 Camley Street which is bound by Camley Street to the east, Granary Street to the west and the Regent's Canal to the north.

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 the construction of a new public footbridge with disabled access to connect 101 Camley Street and 103 Camley Street. The description of development is set out below:

*“Demolition of existing buildings and structures at 101 Camley Street and the subsequent redevelopment for a mixed use building ranging in height between 4 – 11 storeys comprising 2,220 sqm GEA employment floorspace (Class B1), 121 residential units, improvements to the public realm, the provision of a pedestrian footbridge with disabled access over the Regent's Canal 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 in addition the scheme will provide a new footbridge link which will improve connectivity between 101 and 103 Camley Street and provide wheelchair access from the 101 Camley Street site to the northern side of the Regent's 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, local residents and other property owners and businesses and stakeholders.

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) – KSR Architects and Turkington Martin;
- Arboricultural Report – Landmark Trees;
- Structural Engineering Report, including Basement Impact Assessment, Construction Method Statement and Geotechnical Site Assessment – Elliot Wood Partnership;
- Strategic Overview of Employment Spaces to the Gateway Sites – Shaw Corporation;
- Energy Statement – Slender Winter Partnership;
- BREEAM Pre-assessment – Slender Winter Partnership;
- Code for Sustainable Homes Pre-assessment – Price & Myers;
- Daylight, Sunlight, Overshadowing Report – GL Hearn;
- Transport Assessment – TTP;
- Travel Plan – TTP;
- Townscape, Heritage and Visual Impact Assessment – Kevin Murphy and 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 both replicated and 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 The employment floorspace offer will be of a different nature to that proposed at 102 Camley Street; the office space at 101 Camley Street includes the provision of direct access from either Camley Street or Granary Street, and also include the provision of basement servicing and deliveries.
- 2.8 KSR 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 whilst balancing the level change between Camley Street and Granary Street.

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- 2.9 The site at 101 Camley Street forms one of the Camley Street Gateway Sites (in addition to 102 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.
- 2.10 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.
- 2.11 The proposal at 101 Camley Street includes the provision of a significant level of public open space. A new route through the site will be created to encourage linkages between Camley Street and the St Pancras Hospital site.
- 2.12 In addition, the proposals include the construction of a new footbridge which is supported by the London Borough of Camden to link from 103 Camley Street to 101 Camley Street. This will provide substantial improvements to connectivity across the canal and to the local shop which will be provided at 103 Camley Street. The landing point of the proposed footbridge on the south side of the Canal will connect to the proposed building at 101 Camley Street and will include step and platform lift access to enable disabled people to access the bridge and the Regent's Canal towpath.
- 2.13 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 'Very Good' standards, with an aspiration to achieve 'Excellent' 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 east, Granary Street to the west and Regent's Canal to the north. The site covers an area of approximately 0.37 hectares.
- 3.2 The application site comprises a warehouse building (Class B8), which comprises approximately 1,613 sqm (GIA) and is currently occupied by DPD, a postal distribution centre. Due to the changing nature of the operations of large scale distribution and logistics companies, the site is no longer considered ideal for its current use. The site is restricted in relation to the movement of delivery vehicles, which is essential for the efficient operation of the business model. DPD are currently looking at larger sites to relocate to, and have identified a site within the Kentish Town Industrial Park.
- 3.3 There is a maximum level change of 4.5 metres between Granary Street and Camley Street.
- 3.4 The site is located in close proximity to Kings Cross Regeneration Area, and a short distance from Camden Town.
- 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. The southern part of the site falls within the Kings Cross Conservation Area, and the north of the site falls within the Regent's Canal 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 site at 101

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Camley Street has a PTAL rating of 6a (excellent). The accessibility of the site is considered in further detail in the Transport Assessment prepared by TPP.

### **Planning history**

- 3.9 In April 2014 an Environmental Impact Assessment (EIA) Screening Opinion Request was submitted to the Council (application reference 2014/2674/P). On 1 May 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 Advertisement consent was granted in April 2008 for the display of a non-illuminated sign to east elevation of building (application reference 2008/0858/A).
- 3.12 In November 1989, advertisement consent to display two non-illuminated fascia signs depicting the Parceline Company Logo was granted (application reference 8980090).
- 3.13 In July 1984, planning permission was refused for the use of land adjacent to 101 Camley Street for the mooring for a puppet theatre barge and the erection of a temporary building as a workshop and an ancillary studio/office (8400613).

### **The surrounding area**

- 3.14 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, however the site at 101 Camley Street is separated from the existing industrial uses to the north by the Regents Canal, which borders the site to the north.
- 3.15 To the east of the site, 101 Camley Street is currently disconnected from the regeneration site at Kings Cross as a result of the substantial railway lines and road traffic which divide Camley Street from Kings Cross. Further east, on the opposite side of the railway are the Goods Way canal boat moorings (St Pancras Lock) and the Camley Street Natural Park.



- 3.16 To the south of the site is the St Pancras Coroners Court and St Pancras Gardens which provide a large area of open space. On the western side of Granary Street is the St Pancras Hospital site.
- 3.17 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 101 Camley Street should be considered as a standalone development, however the sites are coming forward for development over a similar timescale.
- 3.18 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.
- 3.19 The Council are also in discussions with the owners of 102 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 KSR 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 making provisions within the 101 Camley Street scheme for a new footbridge between 101 and 103 Camley Street over the Regent's Canal. 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 101 Camley Street and the subsequent redevelopment for a mixed use building ranging in height between 4 – 11 storeys comprising 2,220 sqm GEA employment floorspace (Class B1), 121 residential units, improvements to the public realm, the provision of a pedestrian footbridge with disabled access over the Regent's Canal 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 and lower ground floors, accessed directly from either Camley Street or Granary Street. The units have been designed to 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 sized businesses (SMEs). This

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report should be read in conjunction with the Strategic Overview of the Employment Spaces at the Gateway Sites prepared by Shaw Corporation.

- 4.6 Three cores will provide access to the high quality residential accommodation which is located within two blocks which reach a maximum height of 11 storeys (including a setback penthouse level), which steps down in height towards the canal to the north and steps down towards the junction of Camley Street and Granary Street in the south. The proposed development will provide a total of 121 residential units.
- 4.7 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). 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.
- 4.8 The proposed development seeks to contribute to improving linkages to and through the site. It is proposed that the foundations to support a new footbridge between 101 and 103 Camley Street will be provided within the 101 Camley Street building as well as a platform lift for disabled access from the footbridge to ground level at Granary Street. The planning application also seeks consent for the construction of the proposed footbridge, which will connect to the bridge foundations which are currently provided at 103 Camley Street.
- 4.9 In addition, the proposals include the provision of a pedestrian link through the site to provide a direct link between Granary Street and Camley Street. The proposals also include enhancement works to the public realm at the ground level of the development and the provision of several areas of roof top amenity space. Amenity space is created at the ground level on both the bull nose corner at the south of the site (at the junction of Camley Street and Granary Street), as well as a large area of public open space to the north of the site, adjacent to the canal towpath.
- 4.10 In order to address the level change within the site, the architectural form of the building is based around a podium level which comprises the employment floorspace (2,220 sqm GEA) with two stepping elements rising above the podium level. The podium level includes a lower ground floor level with employment uses at Granary Street level, as well as an entrance to the affordable residential core to the north of the site. The upper ground floor level provides the employment units in the southern block which are accessed via Camley Street level, and access to the residential units and concierge area is also provided directly from Camley Street and Granary Street.

- 4.11 The stepping forms rise up from ground level at Camley Street plus 5, 8, 10 and 11 storeys in the northern block, and ground plus 4, 6 and 8 storeys in the southern block, with the height cascading down from the 11 storey element in the centre of the site. The maximum height of the building is level with the maximum height proposed at 101 and 103 Camley Street.
- 4.12 All residential units have private balconies and there are no single aspect north facing units proposed within the development scheme. The stepping architectural form also creates a number of roof terraces and amenity spaces for residents.
- 4.13 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. 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 KSR Architects and Turkington Martin.
- 4.14 Basement servicing, plant and storage is provided via a ramp off Granary Street. Within the basement area 13 disabled car parking spaces and 248 cycle parking spaces are provided for the residential and employment units.
- 4.15 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**

- 4.16 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*

<b>Use Class</b>	<b>Existing Floorspace (sqm GIA)</b>	<b>Existing Floorspace (sqm GEA)</b>	<b>Proposed Floorspace (sqm GIA)</b>	<b>Proposed Floorspace (sqm GEA)</b>
<b>Class B1</b>	1,613	1,698	2,104	2,220

*Table 2 – Proposed residential accommodation*

		Number of units	Floorspace (GEA)
<b>Class C3 Market Housing</b>	<b>Studio</b>	4	
	<b>1 bedroom</b>	16	
	<b>2 bedroom</b>	41	
	<b>3 bedroom</b>	29	
	<b>4 bedroom</b>	1	
	<b>TOTAL</b>	<b>91</b>	<b>13,240</b>
<b>Class C3 Shared Ownership</b>	<b>1 bedroom</b>	1	
	<b>2 bedroom</b>	13	
	<b>TOTAL</b>	<b>14</b>	<b>1,741</b>
<b>Class C3 Affordable Rent</b>	<b>1 bedroom</b>	2	
	<b>2 bedroom</b>	5	
	<b>3 bedroom</b>	7	
	<b>4 bedroom</b>	2	
	<b>TOTAL</b>	<b>16</b>	<b>2,994</b>
<b>Total Residential Units</b>		<b>121</b>	<b>17,975</b>

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## 5.0 CONSULTATIONS

- 5.1 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.
- 5.2 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**

- 5.3 The project team have met with the planning and design officers on numerous occasions through formal pre-application meetings and break out design workshops.
- 5.4 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, pulling back the northern face to increase the canalside amenity space and the introduction of a publically accessible route through the development in line with the existing building form at the St Pancras Hospital site.
- 5.5 In addition the Council encouraged the provision of footbridge with step free access between 101 and 103 Camley Street.
- 5.6 In addition, discussions have also been held with economic development, housing and highways departments to discuss the development proposals.
- 5.7 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 of the footbridge, steps and platform lift at the northern end of the site to link to 103 Camley Street;
- 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**

- 5.8 A formal pre-application meeting was held with Greater London Authority (GLA) planning officers on 29 May 2014. Formal feedback from the GLA can be found at Appendix 1 of this report.
- 5.9 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 and the provision of replacement flexible employment space.
- 5.10 The public realm improvements including the provisions for the footbridge between 101 and 103 Camley Street and the inclusion of new public open space linking the gateway sites is also strongly supported by the GLA.
- 5.11 The proposed level of affordable housing provision was strongly supported by the GLA, subject to demonstrating that this is the maximum viable amount achievable. The GLA supports the high residential quality provided across the scheme, and welcomed the fact that there are no single aspect north-facing units.
- 5.12 A follow up pre-application meeting was held regarding design matters to further consider comments raised by the GLA about the street level frontages and the route through the site. The GLA recognise Camden's position in support of the retention of the route through the site, and consider that the design changes proposed to this route are positive and respond to the points raised.
- 5.13 Comments from the GLA have helped to shape the final scheme design, in particular the entrance points for the residential entrances to the concierge areas to ensure that there is activity at street level.

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### **Transport for London**

- 5.14 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**

- 5.15 A number of meetings have been held with Canal and Rivers Trust (CRT) in relation to the proposed enhancements at canal level and the requirement from Camden to facilitate a footbridge from 101 and 103 Camley Street. The GLA have also expressed strong support for the provision of a footbridge between 101 and 103 Camley Street. Overall the CRT is supportive of the proposed development and the applicant will continue to engage with CRT through the development process.

### **Local Members**

- 5.16 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**

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

### **Public consultation**

- 5.18 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 and considered both the 101 and the 102 Camley Street development proposals. Invitations for the exhibitions were sent to all of the local residents around Camley Street. Approximately 1,008 invitations were sent out for each exhibition.
- 5.19 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.
- 5.20 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.



- 5.21 Following on from the public exhibitions, Gateway Evolution Limited 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**

- 5.22 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**

- 5.23 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.
- 5.24 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.
- 5.25 Wider community groups have also engaged during the consultation process and have responded positively to the overall objectives of the proposed development.
- 5.26 The development team have responded to feedback received following various meetings held with officers from the London Borough of Camden.

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## **6.0 PLANNING POLICY AND ASSESSMENT OF PLANNING ISSUES**

6.1 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**

6.2 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.

6.3 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.

6.4 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.

6.5 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**

6.6 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).

6.7 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.

6.8 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.

6.9 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.

6.10 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)

6.11 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.

6.12 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.

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

### **Site designations**

- 6.14 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
- Kings Cross Conservation Area
- Regents Canal Conservation Area
- Border of Regent's Canal Open Space

### **Planning policy assessment**

- 6.15 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***

- 6.16 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.
- 6.17 Criteria (c) and (e) together provide a key objective in the proposals for 101 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.
- 6.18 The existing warehouse occupier, DPD, expressed their intention to relocate to a larger site with better large vehicle transport access connections. DPD is seeking to relocate within the borough to the Kentish Town Industrial Estate, where they are able to expand their operations and employment.
- 6.19 The operations of DPD have had to respond to the changing nature of the parcel business, which has grown significantly in recent years with rapidly changing shopping profiles, particularly as a result of internet shopping. The site at 101 Camley Street is restricting DPD's operations which now require even larger lorries to make bulk deliveries to be broken down for end delivery. The constrained nature of the site means that it is problematic to significantly increased the number of deliveries at the site to meet growing demand. Van deliveries to DPD are often obliged to park on the edge of the site which leads to increased local traffic and parking congestion.
- 6.20 Taken together with the 2008 Employment Land Review, 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 provisions to better meet modern business requirements.
- 6.21 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.
- 6.22 In accordance with policy requirement (c), the level of employment floorspace on the site is proposed to increase from 1,613 sqm GEA to 2,220 sqm GEA. 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 to the Incubator space coming forward at 103 Camley Street and different again from the neighbouring growth areas which are providing large office floorplates.

- 6.23 Of the 2,220 sqm GEA employment space proposed on site, it is anticipated that approximately 20% of the space will be provided at a reduced rate of 50% of the market rent for a period of five years to facilitate and promote new start up enterprises occupying these premises.
- 6.24 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, but 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.
- 6.25 The proposed employment unit sizes typically range from between 40 sqm up to 125 sqm, with the ability to combine units to provide larger accommodation for expanding businesses. There is also the ability to sub-divide spaces flexibly to create smaller units dependent upon demand, enabling companies to grow and expand (in accordance with policy requirement (e)). In addition the employment spaces benefit from street level entrances and basement servicing facilities. 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.
- 6.26 The scheme provides flexible B1 employment 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.
- 6.27 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.

- 6.28 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.
- 6.29 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.
- 6.30 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 101 Camley Street will seek to deliver flexible employment space and contribute to diversifying the local economy in Camden.
- 6.31 Overall, the proposed employment floorspace is considered to be compliant with the London Plan and Camden's planning policies.

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

- 6.32 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.
- 6.33 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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- 6.34 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.
- 6.35 As such, it is considered that the proposed redevelopment of 101 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.
- 6.36 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, providing 121 residential units.
- 6.37 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.
- 6.38 The provision of residential uses on site is therefore considered to be acceptable in principle.

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

- 6.39 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.
- 6.40 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.
- 6.41 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. The proposed development would contribute towards the provision of new housing, in line with the aspirations of the London Plan. 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



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sustainable housing to come forward for early development as part of the mixed and sustainable planning strategies applicable.

- 6.42 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. All housing will be designed to meet Lifetimes Homes Standards and over 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.
- 6.43 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.
- 6.44 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.
- 6.45 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.
- 6.46 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).
- 6.47 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.
- 6.48 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 reduce affordable housing provision.

6.49 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***

6.50 A comprehensive Daylight and Sunlight assessment has been undertaken by GL Hearn, 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, and to assess the light levels to the proposed residential accommodation.

6.51 The assessment concludes that in relation to the existing buildings, the impact of the proposed development at 101 Camley Street will not have an adverse impact, with all windows requiring testing remaining BRE Report compliant.

6.52 In relation to the proposed development scheme, the assessment considers the daylight levels within all habitable rooms from first to fifth floors. The analysis concludes that of the 190 rooms tested, 98% would meet the ADF target values for their specific room type, with many rooms achieving values far in excess of the guidance minimum standards. The three rooms which have minor transgressions are bedrooms, and the BRE Report considers that daylight amenity to bedrooms is less significant.

6.53 In relation to sunlight, analysis of rooms at first to fifth floors with windows facing within 90 degrees of due south have been tested. GL Hearn conclude that 76% of rooms will be fully BRE compliant in terms of annual sunlight access and 98% will be BRE compliant in terms of winter sunlight amenity access. Where transgressions occur GL Hearn consider these to be minor.

6.54 In terms of overshadowing, the report concludes that 70% of the areas tested within the amenity spaces at ground floor level will comply with BRE guidance in terms of sunlight amenity. Given the orientation of the scheme and the site constraints, this level of compliance is considered appropriate for the area.

6.55 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.

6.56 The report recommends that if the plant provides noise attenuation catching features, the plant should achieve a limit 5 dB below the minimum background noise

level. In relation to façade sound insulation, the report concludes that it is possible to maintain the sound insulation by using high performance acoustically attenuated passive ventilation. Overall the report provides recommendations for the sound insulation and plant noise limits and concludes that the initial façade sound insulation performance requirement will be achieved.

- 6.57 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 102 Camley Street coming forwards.
- 6.58 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 the use of soft landscaping or porous screens are advised in relation to receptors at two amenity space in the route through the site and also at one entranceway at the south of the site. Within the terraces, mitigation measures (taller balustrades and soft landscaping) is also recommended to achieve a sitting categorisation appropriate for summertime amenity use.
- 6.59 In relation to the cumulative position, there are some receptors in the amenity spaces where the results of some receptors were measured at one category windier than desired, and these could be addressed through mitigation measures.
- 6.60 In relation to air quality, Arup have prepared an Air Quality Assessment to assess the potential impact arising on air quality as a result of the proposed redevelopment of 101 Camley Street. Arup have considered the impact of construction and operational periods of the proposed development against the baseline ambient air quality.
- 6.61 During the construction phase the effects and the appropriate recommended mitigation measures there is likely to be a medium risk from the dust generating activities on site. During the operational phase, the likely impact on road traffic exhaust emissions and the proposed CHP are estimated to negligible.

**v. *Design and conservation***

- 6.62 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.

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- 6.63 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).
- 6.64 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.
- 6.65 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.
- 6.66 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 102 Camley Street.
- 6.67 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.
- 6.68 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 stepping form of the proposed design solution is of an appropriate scale and provides a sensitive stepping solution to the massing of the building to reduce the scale of the building towards St Pancras Gardens, St Pancras Hospital and other listed buildings and structures.
- 6.69 The site falls within the Kings Cross and the Regents Canal Conservation Areas and careful consideration has been used throughout the design process to ensure that the proposed development does not have an adverse impact on the character and setting of the Conservation Areas.

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- 6.70 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 provides a significant proportion of public open space.
- 6.71 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.
- 6.72 Significant consideration has been given to how to incorporate the Council's wider aspirations for the future redevelopment of the wider area, including the potential redevelopment of the St Pancras Hospital site. As a result of dialogue with the Council a pedestrian route between the two taller elements has been provided to connect the lower level at Granary Street through to Camley Street, in line with the existing key route through the St Pancras Hospital site. This has the effect of providing a clear visual link between the hospital site and the gas holders at Kings Cross to the north east.
- 6.73 At street level the scheme provides glass frontages to the employment units, which vary in height between the Camley Street and the Granary Street frontages. The units and street frontages will help articulate both Camley Street and Granary Street and improve visual surveillance to the street.
- 6.74 There are three entrance points for the residential apartments; two are provided for each of the taller elements directly from Camley Street, whilst the entrance to the affordable residential core is provided directly off Granary Street. All three of these residential entrance points includes large glass panels to improve visibility and natural surveillance between the residential cores and public plaza area on Camley Street and also between the affordable core and the public open space provided to the north of the site.
- 6.75 The scheme has been designed to maximise open space provision throughout the site including areas of public amenity space to the north and south of the site, in addition to the publically accessible route through the centre of the site. There is also a significant proportion of privately accessible open space provision as part of a terraced area on the upper ground floor level, as well as a series of roof terraces which are accessible to residents.
- 6.76 It is considered that the scheme design will encourage the movement of workers, residents and visitors through the site, thereby activating both the Camley Street and Granary Street frontages.

- 6.77 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.
- 6.78 The stepped building height and footprint adds architectural interest to the building and enables the provision of dual aspect residential units, with no single aspect north facing units.
- 6.79 The TVIA concludes that the proposed development at 101 Camley Street will serve as a market 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 Kings Cross Conservation Areas.
- 6.80 Overall the proposals are considered to be consistent with the design aims of the development plan.

**vi. Landscape, biodiversity and playspace**

- 6.81 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.
- 6.82 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.
- 6.83 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.
- 6.84 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.

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- 6.85 An Arboricultural Impact Assessment has been prepared by Landmark Trees and submitted as part of this planning application. The Arboricultural Impact Assessment concludes that existing vegetation on the site is of a poor quality. Landmark Trees consider the potential impacts of the proposed redevelopment of 101 Camley Street to be relatively low in terms of both quality trees removed and the recommended protection area encroachments of trees retained. The trees which are proposed to be felled are of little individual significance and their loss is not considered to adversely affect the visual character of the conservation area.
- 6.86 Any trees felled will be more than replicated with the good quality semi natural trees as part of the high quality landscaping scheme for the amenity spaces and areas between the gateway sites (outlined in further detail in the Design and Access Statement).
- 6.87 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. The proposed development seeks to improve the quality of the setting of the southern part of the towpath, including the provision of an area of public open space adjacent to the canal.
- 6.88 The development promotes a safer, more inviting canalside 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.
- 6.89 In relation to residential amenity, the proposed development at 101 Camley Street will provide 420 sqm of communal amenity space at roof level, 312 sqm of community amenity at Camley Street level. All residential units will have private balconies, which provide a total of 1,406 sqm of private amenity space, and all of which meet the minimum space standards set by the Mayor. Further details of residential amenity can be found within the Design and Access Statement.
- 6.90 In addition, the scheme proposes improvements to the vegetation and planting along Camley Street and Granary Street elevations. The scheme provides a large area of publically accessible open space to the north of the site near the Regent's Canal, through the centre of the site and to the south which in total comprises 1,285 sqm and includes children's playspace. The scheme provides for approximately 45% of the site area to be publically accessible which is a high proportion of the total site area.

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- 6.91 Overall biodiversity of the site will be significantly improved through the provision of green/brown roofs, bird boxes and allotment spaces provided on the communal green roof spaces.
- 6.92 The areas of publically accessible open space to the north and south of the site are in compliance with Development Policy DP31 which 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.
- 6.93 The proposed landscape and biodiversity enhancements at 101 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 and to also co-ordinate plans to provide a bridge link as part of the 101 Camley Street proposals to link to 103 Camley Street. This is outlined in further detail in the Design and Access Statement.
- 6.94 In terms of ecology, the Ecological Assessment identifies that the existing habitats offer no more than low to negligible ecological value. Aspect Ecology conclude that subject to the implementation of the recommendations set out in the report (which relate to safeguarding the non-statutory nature conservation designation of the Regent's Canal), 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.
- 6.95 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**

- 6.96 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.
- 6.97 An Energy Strategy has been prepared by McBains Cooper in relation to the proposed development. In accordance with the London Plan and the Mayor's Sustainable Design and Construction SPG (2014), the regulated carbon dioxide emissions of the proposed scheme have been reduce 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 Mayors Energy Hierarchy.



- 6.98 The proposals achieve a 13% reduction in carbon emissions through developing a combination of improved building fabric, ventilation systems, low energy lighting and high efficiency boilers. It is proposed that a Combined Heat and Power (CHP) unit and a Ground Source Heat Pump (GSHP) 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 11% reduction in carbon dioxide emissions.
- 6.99 To further reduce the carbon dioxide emissions, an assessment of renewable energy technologies has been considered which will provide a further 29% reduction in carbon dioxide emissions.
- 6.100 Overall the proposed Energy Strategy is compliant with GLA guidance and is considered to be acceptable in principle.
- 6.101 Price and Myers have prepared a BREEAM pre-assessment report in relation to the proposed development. The report concludes that the scheme will achieve BREEAM New Construction 2011 rating 'Very Good' for the B1 employment element of the scheme, achieving a total score of 68%. This rating includes achievement of more than 60% of the Energy and Water credits and over 40% of the Materials credits as required by Camden Development Management Policy DP22.
- 6.102 The BREEAM pre-assessment also sets out that the scheme could target a BREEAM rating of 'excellent' and sets out potential credits which could be achieved, subject to contractor achievements and the future tenant fit out.
- 6.103 In relation to the residential element of the proposed development, Price and Myers have also undertaken a Code for Sustainable Homes pre-assessment which identifies that the scheme proposals can achieve Code for Sustainable Homes Level 4, which is also in accordance with the London Plan and Camden Development Plan standards.
- 6.104 Overall the proposed development at 101 Camley Street achieves high levels of sustainability and is considered to be in accordance with planning policy requirements.

**viii. Transport, servicing and parking**

- 6.105 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.

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- 6.106 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.
- 6.107 The proposed development will be car free, with the exception of 13 disabled car parking spaces within the basement of the site, accessed from Granary Street. The predominant method of travel by residents and workers to and from the development is likely to be by walking or cycling.
- 6.108 The scheme will provide 237 cycle parking spaces for residents (including 12 spaces for visitor use). For the commercial element, 11 cycle parking spaces are proposed. All cycle parking will be provided in secure and undercover storage facilities. The proposed cycle parking provision is in accordance with GLA and LBC standards.
- 6.109 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.
- 6.110 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.
- 6.111 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. On site car parking is only available to be allocated to wheelchair accessible units and therefore the scheme is considered to comply with this policy requirement.
- 6.112 Refuse stores will be provided at lower ground and upper ground levels and refuse collection will be undertaken on-street at Granary Street and Camley Street.
- 6.113 Servicing will be provided at basement level, accessed via a vehicle ramp from the lower ground floor level on Granary Street.
- 6.114 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 101 Camley Street seeks to enhance walking linkages across the canal to 103 Camley Street via a footbridge over the canal.
- 6.115 During the early stages of the pre-application discussions with the Council the client team has been aware of the Council's aspirations to provide a new pedestrian

footbridge to link between 101 and 103 Camley Street. The development under construction at 103 Camley Street has included the provision of the foundations for the landing point of the proposed bridge. The Council's Highways department provided initial designs of how the proposed bridge could connect from the foundations at 103 Camley Street to the southern side of the Regent's Canal via a long ramp down to the corner of Granary Street.

- 6.116 Following discussions with the relevant officers at the Council, KSR Architects developed a revised scheme design whereby the proposed footbridge landing point was included within the 101 Camley Street site in order to achieve a successful design solution for the bridge, which includes disabled access via a platform lift and addresses the level change between the northern and southern parts of the Canal. It has been agreed with the Council and the GLA that the proposed KSR footbridge design forms part of the development proposals at 101 Camley Street.
- 6.117 Accordingly, the design and access statement and proposed plans and elevations provide further detail about the proposed footbridge and the links this creates between the 101 Camley Street site and publically accessible open space at the north of the site to the rest of the Camley Street gateway sites.
- 6.118 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 the Transport Assessment prepared by TTP outlines a summary of the key principles of the future Construction Management Plan.

**ix. Accessibility**

- 6.119 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.
- 6.120 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.
- 6.121 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 13 disabled car

parking spaces. Overall accessibility to the site will be greatly enhanced as a result of the provisions made to include a pedestrian footbridge between 101 and 103 Camley Street, which will include a platform lift for disabled access. A platform lift is also being provided at 103 Camley Street to provide step free access from the bridge to canal towpath level.

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

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

### Section 106 Obligations

7.1 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

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

- Community facilities contribution totalling £255,780
- Contribution to education totalling £422,641
- Public Open Space contribution towards St Pancras Gardens £183,797
- Canal Bridge between 101 and 103 Camley Street £200,000
- Environmental contribution £50,000
- Highways (footway public realm) £27,000
- **TOTAL = £1,139,218**

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

- Improvements to access the canal towpath and gateway sites including the provision of the proposed canal footbridge link between 101 and 103 Camley Street.
- The creation of landscaping to new publically accessible open space including the route through the site and the northern amenity and playspace.
- **TOTAL INHERENT BENEFITS = £500,000**

7.4 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 £1,639,218.

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

#### **Mayor's Community Infrastructure Levy**

- 7.6 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).
- 7.7 The existing warehouse on the site totals 1,613 sqm (GIA). The proposed development comprises 2,104 sqm (GIA) of commercial floorspace and 16,397 sqm (GIA) of residential floorspace (including ancillary residential space), which equates to a total development of 18,501 sqm (GIA).
- 7.8 This scheme results in a chargeable building floorspace of 16,888 sqm (GIA) given that the existing floorspace meets the lawful occupancy test. A deduction for social housing relief applies to the 4,350 sqm (GIA) affordable housing, and consequently a payment will be due of £626,999. A CIL additional information form has been completed and forms part of this application.
- 7.9 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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## 8.0 CONCLUSIONS

- 8.1 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.
- 8.2 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 and elsewhere. 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 Incubator space being promoted at 103 Camley Street and will continue to foster links between the local business and resident community.
- 8.3 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.
- 8.4 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.
- 8.5 KSR 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 the Kings Cross and the Camley Street gateway sites. The development of 101 Camley Street has been developed to ensure that the gateway sites provide an overall cohesive and legible enhancement to the public realm, and include the provision of a new pedestrian footbridge and disabled access between the 101 and 103 Camley Street. The Design and Access Statement outlines the proposals in further detail.

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- 8.6 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 'very good' with an aspiration to achieve 'excellent' and the residential accommodation will meet Code for Sustainable Homes level 4.
- 8.7 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.
- 8.8 Overall the development proposals for 101 Camley Street are 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.