

Address:	79 Camden Road and 86-100 St Pancras Way London NW1 9EU	
Application Number:	2013/7646/P	Officer: Conor McDonagh
Ward:	Cantelowes	
Date Received:	27/11/2013	
Proposal: Redevelopment of the site to create 166 residential units, including affordable housing, following demolition of all existing business use buildings (Class B1) on the site and construction of a new building ranging from 5 to 7 storeys in height, together with associated works to create a lower ground floor, landscaping and public realm improvements.		
<p>Drawing Numbers: Existing: prefix 4998-00-001; 002; 003; 004; 005; 006; 007. Demolition: 011; 012; 013; 014; 015; 016. Proposed: prefix 4998-20-101; 102; 103; 104; 105; 106; 107; 108; 109; 119; 120; 121; 122; 123; 130; 131; 132; 133; 901. Landscape: prefix LN00332-100; 200; 201; 202.</p> <p>Documents: Drawing Package (including Existing, Demolition and Proposed Plans, Elevations and sections and Landscape Plans) prepared by Sheppard Robson Architects and Outerspace; Design and Access Statement prepared by Sheppard Robson; Access & Inclusivity Statement prepared by All Clear Design; Townscape and Visual Impact Assessment prepared by Peter Stewart Consultancy; Planning Statement by CBRE; Employment Statement prepared by CBRE Planning; Affordable Housing Statement prepared by CBRE Planning; Statement of Community Involvement by Hardhat Communications; Heritage Statement prepared by Heritage Collective; Transport Assessment prepared by SKM Colin Buchanan; Travel Plan prepared by SKM Colin Buchanan; Draft Construction Management Plan prepared by URS; Waste and Recycling Strategy by URS; Noise Assessment by URS; Air Quality Assessment by URS; Phase 1 Habitat Survey by URS; Arboricultural Report by Unwin Forestry Consultancy; Energy Strategy Overview (including Code for Sustainable Homes Pre-Assessment) Whitecode Design Associates; Sustainability Statement by Whitecode Design Associates; Basement Impact Assessment by Card Geotechnics Limited; Surface Water Drainage Statement by URS; Archaeological Desk Based Assessment prepared by URS; Pedestrian Level Wind Microclimate Assessment Desk Study prepared by RWDI; Internal Sunlight and Daylight Report prepared by GIA; External Sunlight and Daylight Report prepared by GIA (all dated Nov. 2013). GLA Stage 1 Response Letter by CBRE dated 11/02/14; CHP Plant roof drawing by Whitecode 9871-M-50001 R1; Supplemental Noise Assessment – Façade Mitigation by URS dated Feb 2014; BIA Independent Assessment Report by Geotechnical Consulting Group dated Feb 2014; Site Drainage drawing by Walsh Associates 3684-320; Transport post-submission notes by SKM Colin Buchanan dated 6/02/14 and 27/02/14.</p>		
RECOMMENDATION SUMMARY: Refuse planning permission and refer back to the Mayor of London for his Stage 2 Direction.		
Applicant:	Agent:	
Mr Jamie Gillingham Barratt West London Wallis House Great West Road	CBRE Henrietta House 8 Henrietta Place London	

Brentford Middlesex TW8 9BS	W1G 0NB
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ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace
Existing	B1 Business		7,188m ² GIA
Proposed	Market		8,574 m ²
	Affordable rent		5,116 m ²
	Intermediate		3,346 m ²
	C3 Residential total		17,036 m² GEA

Residential Use Details:						
	Residential Type	No. of Bedrooms per Unit				Total
		1	2	3	4	
Proposed market	Flat	16	60	6	-	82
Proposed affordable rent	Flat	11	24	8	3	46
Proposed intermediate	Flat	23	15	-	-	38
Total		50	99	14	3	166

Parking Details:			
	General parking	Disabled parking	Cycle parking
Existing	Unknown	Unknown	Unknown
Proposed	0	2	296

OFFICERS' REPORT

Reason for Referral to Committee:

Major development for more than 10 residential units [clause 3(i)]; is subject to the completion of a Section 106 legal agreement for matters which the Director of Culture and Environment does not have delegated authority [clause 3(vi)].

The application comprises over 150 units of new housing and is therefore considered a 'strategic' application under the Mayor of London Order 2008. The application is thereby referable for his direction, whereby he has power to direct the local authority to refuse the application or call the application in for his own determination.

1. SITE

- 1.1 The 0.42 hectare site is rectangular in shape and bounded by Rochester Place to the northeast, Camden Road to the southeast, St Pancras Way to the southwest and a three-storey office building (102 St Pancras Way) to the northwest. Surrounding context includes a 5 storey post war residential block known as

Bernard Shaw Court which spans the entire opposite side of Pancras Way, the St Pancras Estate is located directly across Camden Road with a series of 6 storey residential blocks set deep with a large expanse of green open space, and across the narrow cobbled Rochester Place is two terraces of buff brick 3 storey mews style development (81-83 Camden Rd and 2-12 Rochester Mews) set perpendicular to the street and a recently built 4 storey mixed use development.

- 1.2 The site is comprised by various interlinked elements of different heights and varying age, which can be distinguished into two addresses being 86-100 Pancras Way and 79 Camden Road. The main building fronting Pancras Way comprises a 3 storey central block with two 2 storey subservient wings, and separate 1, 2 and 3 storey elements behind that form a predominantly single storey frontage along Rochester Place. This block was a purpose built factory dating from the 1920s known as Hilger Works. The 79 Camden Road is 4 storeys plus lower ground dating from the 1960s. Since 1994 the majority of the site was occupied as offices by the council's social services division who vacated in spring 2010, with a smaller element occupied by the parking division until summer 2012.
- 1.3 The site sits outside the Central London area of Camden, and a short walk from Camden Town Centre boundary. It also falls outside any conservation area, but sits centrally between four separate nearby conservation areas (CA), including Rochester CA immediately north across Rochester Place, Camden Square CA to the northeast across Camden Road, Camden Broadway CA immediately south across St Pancras Way and Jeffrey's Street CA to the northwest across St Pancras Way. Nearby listed buildings include a Grade II terrace at 108-132 St Pancras Road. Finally, the site falls within the Parliament Hill to St Paul's Cathedral strategic viewing corridor (View 2A.1 of the LVMF).

2. THE PROPOSAL

Original

- 2.1 A complete redevelopment of the site is proposed in the form of an 'S shaped' block that is formed by 6 interlocking 'L shaped' residential blocks (A, B, C, D, E and F). The built footprint would extend to the pavement edges on all sides, and would result in 2 courtyard spaces each measuring 18m x 18m at lower ground level (comprising 488sqm of usable amenity). Both courtyard spaces would be predominantly enclosed and accessible to prospective residents only. The western courtyard would be overlooked by and serve the affordable housing blocks A, B and C, and a gap would face onto Rochester Place and align with the view down Rochester Mews. The eastern courtyard would serve the market housing blocks D, E and F, and a gap would face onto Pancras Way that would be main entrance to the housing via a foyer. At roof level there would be 2 further courtyards totalling 426sqm, which would include 110sqm of children's playspace.
- 2.2 A range of heights are proposed in order to respond to the different contexts around the site. Along Pancras Way the height is predominantly 5 storey parapet plus a fifth floor set back, along Camden Road there is 5 storey parapet plus a setback double storey on top, along Rochester Mews the height is a 4 storey parapet plus a fourth floor setback. The central block that divides the two

courtyards would be 7 storeys that would be set further back from Pancras Way and Rochester Place parapets. The predominant material would be brick with a mid-grey colour to the public elevations and a light cream to the private elevations facing the courtyards. The setback loft accommodation would comprise a rust colour Cor-ten steel cladding system.

3. RELEVANT HISTORY

3.1 **9100126:** Use of the existing buildings for any purpose within Class B1 of the Town and Country Planning (Use Classes) Order. **GRANTED** 05/06/1991.

3.2 **PEX0200664:** Change of use of part of the ground floor from offices (B1a) to Doctors' surgery (D1) for a temporary period plus internal alterations and redevelopment of the loading bay into ancillary office accommodation, with roof mounted air conditioning plant above. **GRANTED** 17/09/2002.

Condition 1 limited the change until 31/12/2005. This consent was associated with the James Wigg practice (GP surgery) while their permanent home at 2 Bartholomew Road was refurbished.

3.3 **2006/1860/P:** Variation of condition 1 of planning permission granted 17th September 2002 (ref PEX0200664) for the change of use of part of the ground floor from offices (Class B1a) to Doctors' surgery (Class D1) for a temporary period, to allow the use to continue until 31 December 2008. **GRANTED** 14/06/2006.

Condition 1 stated that the use shall revert back to B1(a) offices once temporary period expired.

3.4 **2013/4905/P:** Request for Environmental Impact Assessment (EIA) Screening Opinion for redevelopment of site for construction 8 storey building comprising 180 residential units following the demolition of existing building. **EIA NOT REQUIRED** 05/09/2013.

Based upon the description of the development provided and the information provided, the development is not considered to be likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

55 Rochester Place and 3a Wilmot Place

3.5 **2011/1540/P:** Erection of a part 2, part 3 and part 4 storey building plus excavation of basement level to comprise flexible Class B1 use at basement and ground floor level, with 4 self-contained residential units on the upper floors (3x1 bed and 1x2 bed units) following demolition of existing two storey (ground and first floor) building. **APPEAL AGAINST NON-DETERMINATION 'DISMISSED'** 06/03/2012.

There is recent history of refusals on this site principally in regards to loss of employment floorspace. In this most recent decision the Inspector agreed with previous Inspectors in that the loss of existing B1 space would be unacceptable, and re-provided B1 space would not be of an appropriate quality.

4. CONSULTATIONS

STATUTORY

4.1 **Greater London Authority Stage 1 response:** SUPPORT subject to further clarification on some points before referral back for stage 2. Comments are summarised below.

Land use

- The applicant has submitted an employment statement, which argues that the site is in poor condition, and would be unviable for continued business use, that demand for employment floorspace in this location is limited, and that borough-wide there is projected to be sufficient supply of office floorspace to meet demand over the plan period to 2026. In this context, the loss of office floorspace in this location, which is away from other more successful and strategically significant office-based locations within the borough, does not cause strategic concern.
- The site's location within an existing residential area, in close proximity to Camden town centre, with good public transport links, supports the provision of housing. The principle of the proposal is therefore acceptable in strategic planning terms.

Affordable housing offer

- The commitment to a substantial proportion of affordable housing is strongly supported, however in accordance with London Plan Policy 3.12, the applicant is required to demonstrate that this represents the maximum reasonable amount of affordable housing. At present no details regarding financial viability have been provided. It is therefore not possible at this stage to determine whether the application fully accords with London Plan Policy 3.12. The applicant is therefore required to submit a financial viability assessment in support of its affordable housing proposal.

Housing choice / mix

- London Plan Policy 3.8, together with the Mayor's Housing SPG, and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. The Council has identified within its Development Policies Development Plan Document that, within the social housing element, highest priority be afforded to family accommodation. Within its recent Camden Planning Guidance: CPG 2 Housing, the Council establishes a requirement that 50% of units within overall social housing provision be three-bed plus homes.
- The application includes seventeen three-bed plus family units, equating to 10% of overall provision. Within the social housing element, where the strategic priority for family housing is targeted, the proposal includes eleven three-bed plus units, equating to 24% of provision. This is substantially below the Council's 50% guidance for the provision of family social housing. Whilst the applicant has sought to prioritise the provision of family housing within the affordable element, which is supported, the applicant is strongly encouraged to explore whether additional family units can be provided in accordance with the Council's policy guidance.

Housing quality

- The applicant has stated in its submission documents that all units will meet and exceed the space standards set out in London Plan Policy 3.5. However, it is not possible to ascertain this from the accommodation schedule submitted, as this does not disaggregate per unit. A more detailed schedule should therefore be provided demonstrating the size of each unit against London Plan standards.

- The proposal includes thirty duplex units, independently accessed either at ground-level, or lower-ground level, providing quality family accommodation, and ensuring active frontages, and a traditional residential terrace-type environment, both at street level and within the proposed internal courtyards. The generous number of cores proposed results in the provision of 78% of the units as dual-aspect, with only five units being single-aspect, north-facing, representing 3% of all accommodation. This is strongly supported.
- It is disappointing that the entrances to blocks A and B remain distinctly less prominent and attractive than those serving the remaining blocks, and involve a convoluted route from street to core.
- It is acknowledged that the affordable and private tenures both benefit from ground and lower ground-floor duplex units, formal and roof-top courtyards, as well as private amenity space. The roof-top courtyard associated with the affordable units is considerably larger than that for the private residents and will ensure appropriate levels of overall play and amenity space. The design of the development does not differentiate externally between tenures, and in that respect will be 'tenure-blind'. On balance, the approach to residential layout is acceptable.

Communal amenity

- Given their location and surrounding built form, it is acknowledged that the two courtyard spaces will not benefit from generous levels of light, and therefore their usability for amenity provision is limited. However, as set out by the applicant, these spaces primarily serve as an arrival and transition space and are not intended for general amenity. As such, the proposal includes two roof-top courtyards, which will provide quality, light and well-sized areas for play and general amenity. This approach is broadly supported.
- In recognition of the greater number of children expected as part of the affordable element (24 of the 27 under-five's are expected to be housed within the affordable provision), the communal roof-top terrace provided for the affordable units is considerably larger than that for the private units, at 293 sq.m. This terrace has been designed so as to provide dual-use general residential amenity space, as well as play space, with the landscape design utilising natural features to facilitate play.

Housing density

- The density of the development is 1,045 habitable rooms per hectare. This is within the London Plan guidance range of 650 to 1,100 habitable rooms per hectare for central sites with a public transport accessibility level of six, as set out in London Plan Policy 3.4.
- Given the high levels of public transport accessibility at this site, and its location in close proximity to Camden town centre, on a main arterial route, it is acknowledged that it is an appropriate location for a high density development. As detailed in the relevant sections of this report, the design of the proposal is of a high quality, responds appropriately to its context, and delivers a range of private and shared amenity spaces, with a large proportion of ground-floor duplex units. In that context, the density of the proposal is acceptable in accordance with strategic policy.

Urban design

- The proposed scheme is generally well designed, providing a good mix of high-quality residential typologies that will contribute positively to the character of the area. The scheme creates a strong building line and good quality active street frontage onto Camden Road, St Pancras Way and Rochester Place, providing a good level of enclosure and definition to the surrounding public realm, particularly given the relatively narrow depth of the site.

- The proposed breaks to the building mass facing St Pancras Way and Rochester Place will improve levels of light within the courtyards, which is welcomed, and, as illustrated by the submitted views accompanying the application, these breaks have been appropriately sized and designed so as not to undermine the quality of the enclosure and frontage on to the corresponding streets.
- The proposed height of the building, which rises to a five-storey shoulder height, with two-set back storeys, is acceptable, and responds appropriately to the surrounding context. The applicant's townscape and visual impact assessment demonstrates that the proposal does not adversely impact on any of the conservation areas located in the immediate vicinity of the site.
- The development falls below the threshold height of the viewing corridor for strategic view 2 (London Panorama: Parliament Hill), as identified in the London View Management Framework Supplementary Planning Guidance.
- The simple massing creates an elegant and legible building form, which has been detailed with perforated metal, simple metal, and glass balustrades. The residential entrances have been appropriately signposted through the use of a contrasting weathering steel, which is also utilised on the set-back elements, providing a playful and welcomed contrast and detail to the largely brick form. The result is a robust and high-quality residential building, which is strongly supported.

Climate change

- The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions. An appropriate range of passive design features, and demand reduction measures, have been included to reduce the carbon dioxide emissions of the development.
- The applicant has committed to ensuring that the development is designed so as to allow for future connection to a district network, should one become available.
- The applicant is proposing to install a site-wide heat-network, supplied from a single energy centre. The applicant should confirm that the network will serve all of the residential units, and provide a schematic demonstrating sufficient space has been allocated within the energy centre for the proposed plant.
- Given the scale of the scheme, the applicant should provide further information regarding how, and by whom, the combined heat and power unit, and electricity sales, will be managed.
- A roof plan showing the proposed location of the 130 sq.m. of photovoltaic panels has been provided.
- An overall reduction of 83 tonnes of carbon dioxide regulated emissions compared to a 2010 Building Regulations compliant development is reported to be achieved through all the measures outlined above, equivalent to an overall saving of 41%. This percentage saving exceeds the London Plan target, and is supported.

4.2 **Transport for London:** NO OBJECTION subject to further confirmation on items and securing of s106 obligations, summary below.

- TfL welcomes the car free nature of this development, aside from the provision of two on-street spaces for Blue Badge holders, in line with London Plan Policy 6.13.
- TfL recommends that the accessible spaces are equipped with active electric vehicle charging points, provision of which should be secured through planning condition.

- TfL also recommends that future occupants of the site be excluded from eligibility for on-street car parking permits within the existing controlled parking zone. This should be secured through the section 106 agreement.
- TfL welcomes the applicant's commitment to provide 296 cycle spaces on site, which is in accordance with London Plan Policy 6.9.
- The nearest cycle hire docking station is located approximately 200 metres to the south of the site. The proposed development may lead to a further increase in demand for cycle hire usage. Therefore, the applicant should explore with TfL either contributing towards installing a new docking station, or increasing the size of an existing station.
- TfL is satisfied that, given the number of forecast trips resulting from the proposals, the likely impact on the capacity of the highway network, London Overground services, and the bus network is acceptable, in accordance with the London Plan Policy 6.3.
- TfL requests that a planning obligation be imposed requiring the applicant to enter into a section 278 agreement under the Highways Act 1980, with TfL for any highway works on TfL's highway associated with the development, including, but not limited to, the proposed footway renewal on the Camden Road frontage.
- TfL also requests £15,000 to upgrade bus shelter (0107/0110) at bus stop 331 (F), located approximately 100 metres to the south of the site on Camden Road, in accordance with London Plan Policy 6.2. The delivery of the bus shelter should be secured via the section 106 agreement.
- A contribution towards financing the installation of Legible London signs to enhance the way finding capability for pedestrians in this area, and encourage sustainable travel, is also sought. For information, a pair of Legible London signs cost £15,000, and the agreed sum will need to be secured through the section 106 agreement.
- TfL requests that construction activity is not undertaken from Camden Road, given its strategic function, but from other surrounding roads.
- TfL also notes there are several trees along the site frontage located on the public highway. Whilst it is noted these trees are not to be removed as part of the redevelopment of the site, it remains unclear how they will be impacted upon during demolition and construction. TfL requires details of how the erection of hoarding, scaffolding and similar activities will impact upon the trees, which should be detailed in the construction logistics plan.
- The residential travel plan should be secured through a section 106 agreement, and a construction logistics plan, and delivery and servicing plan should also be secured by condition, to be approved by the Council in consultation with TfL.
- The Mayor has introduced a London wide Community Infrastructure Levy (CIL) to contribute towards the funding of Crossrail. The rate for Camden Council is £50 per square metre (gross internal area). The required CIL should be confirmed by the applicant and Camden Council once the components of the development have been finalised.

4.3 **English Heritage: NO OBJECTION**

- English Heritage states that the application should be determined in accordance with national and local policy guidance, and on the basis of Camden's own specialist conservation advice.

4.4 **Environment Agency: NO OBJECTION**

- We did not need to be consulted on this application. This is because the site is in Flood Zone 1, is less than 1 hectare and development is not within 20 metres of a Main River.
- However please secure an informative to ensure that any proposed piling methods do not pose a pollution risk to controlled waters.

4.5 Thames Water: NO OBJECTION subject to standard piling condition and informative being secured.

- Thames Water considers that the onsite sustainable urban drainage systems proposed would ensure that the existing wastewater infrastructure would not be harmfully impacted upon and would accommodate the needs of this application.
- The following condition is required - No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.
- Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required.
- The following informative is required - Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

4.6 Natural England: NO OBJECTION

- The proposal is unlikely to affect any statutorily protected sites or landscapes.
- The Council should apply Natural England's Standing Advice to the application that includes a habitat decision tree which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.
- This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application.
- This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature.

LOCAL GROUPS*

4.7 Jeffrey's Street CAAC: NO REPLY TO DATE

4.8 Camden Square CAAC: NO REPLY TO DATE

4.9 **Rochester CAAC:** NO REPLY TO DATE

4.10 **Twentieth Century Society:** NO REPLY TO DATE

**Any late responses will be summarised in a Supplementary Report.*

4.11 **North Camden Town Neighbourhood Forum Steering Group:** OBJECTS, summary of concerns below:

- The site was used as office space and a GP Surgery in the recent past. The building should be refurbished to provide light industrial space.
- The massing is too large/heavy and significantly higher than the surrounds, particularly the 1-2 storeys of Rochester Place.
- The building line being moved to the St Pancras Way pavement would lose the existing space used for site delivery and servicing.
- There is no local precedent for the entire site excavation for basement and sunken courtyard.
- The noisy and polluted junction of St Pancras Way and Camden Rd is not suitable for residential development at lower ground and ground floors and residents will have blinds drawn creating an inactive frontage.
- Litter will end up in lightwells and street edge planting.
- The number of occupants proposed, alongside cumulative impact of other new developments (Agar Grove intensification, Hawley Wharf and Twyman House) would have too much pressure on GP and school places.
- There is no indication on how large deliveries (furniture) would access the site and the waste trucks along the narrow mews of Rochester Place already experience problems with mounting the footpaths.
- The disabled access parking bays would be difficult to manoeuvre in practice.
- The Cor-ten material on the top floors would only accentuate height of building, and the dark brick of the facades will emphasise the bulk of the building.
- The London Plane tree on St Pancras Way should be retained, or at least replaced with another Plane in the same position.
- The proposed roof gardens would give rise to possible noise nuisance.
- The pre-application consultations involved very few local residents and not presented in the Council's Site Allocations Document.
- The proposed 100% housing and density is a massive overdevelopment and a cynical proposal by a commercial developer to maximise profits, with no benefit to the local community.
- Highly likely those private units will be bought by buy-to-let investors with no interest in local community.
- The application has no transparency, given that Camden owns the site and is also judging the planning application; the residents seek independent opinion by the Inspectorate or other relevant body. *Officer response: The Local Planning Authority has a statutory function to apply relevant planning policies to all planning applications received, regardless of who owns a site or the identity of an applicant. The relevant policies have been fully considered and applied independently. Moreover the GLA has also fully considered the application and the Mayor will ultimately decide whether the Council should determine the case or if he should call it in for his own determination.*

4.12 **Reed's and Rochester Place Neighbourhood Association: OBJECTS.**

This proposal would provide much needed social housing and much needed cash for the borough coffers but it removes all employment space in providing 166 small residential units in a small space while reducing the amenity of those living/working and moving around it. Summary of our concerns documents are listed below.

1 Loss of industrial space:

The application in its demand to create mass residential fails to provide replacement industrial space; description of the site location and the existing building fail to acknowledge the industrial nature of the area and the site. By creating no replacement industrial the proposed non-employment uses will prejudice continued industrial use in the surrounding area and make a complete mockery of the London Plan, Camden's LDF and the efforts of Inspectors, Officers and local business who have followed Camden's UDP and the LDF in the last 15 years.

- The site is in the old Kentish Town Area which protected Industrial buildings in Rochester Place (UDP) until 2010. The LDF protects industrial stock using the same language –but does not indicate areas.
- In Rochester Place, since 2000 there has been one change of use from light industrial to a small amount of office at 57-59 Rochester Place [currently has an application for change of use to residential]. There have been 27 applications at the following properties: 102 St Pancras Way and the following numbers (all in Rochester Place), 26-28 [three applications], 36-38 [three applications/ 2 appeals], 5 [four applications/2 appeals], 61-63 [nine applications/2 appeals], 50 [two applications/1 appeal], 60, 62, 64 [two applications], 68-74. None have allowed industrial space to be removed. One application at 26-28 Rochester Place permitted 13 flats over the industrial rebuild.
- Nowhere in any documentation is the industrial designation of Rochester Place is acknowledged. Reed's and Rochester Place Neighbourhood Association [on whose behalf I write] and the Rochester CAAC have been involved with each of the applications listed. Some of the applications were for much reduced amounts of industrial space; none were permitted. We have supported Camden at every appeal; none were permitted.
- The site location and the site description are incorrectly described. Throughout all the applications [27 applications and 7 appeals] in Rochester Place officers gave observations and reported on the industrial setting of the street and the industrial nature of the buildings. Inspectors took a dim view of inadequately described buildings and marketing evidence which incorrectly described potential and costs.

2 Site and surroundings:

This building has been designed on paper without regard to the plot and surroundings. It has not been designed to sit in its environment; it is a selfish building – taking from its community, giving nothing back. The same design is used on all sides of the build. Rochester Place is not a 'main' road – it is a back street. Any new build should respect that. The narrow setted mews cannot take the services/people/traffic as designed.

3 Tree removal and radical pruning in public space:

All the local trees are set on, or close to, busy streets. All have high amenity value – the effect on the existing tree-scape will be dramatic. A mature London Plane (T1) is to be removed to facilitate block B access; two others on Camden Rd are to be much reduced by severe pruning. London Planes absorb pollution; the planned replacement does not.

- Historic building lines are being ignored. This is an industrial development; the existing delivery area is predominately on St Pancras Way. In removing the industrial space [not re-providing] all delivery and access areas at ground and lower ground are being taken. Space in the public realm has been taken on Camden Road.

4 Residential standards are not met:

Some flats are undersized according to Camden standards; standards for refuse collection and storage are not met. Life is made very difficult for the less able with difficult access arrangements.

- 62 of the 90 x 4-person flats are undersized
- 1 of the 13 x 5-person flats is undersized
- 11 of the 17 wheelchair flats are undersized
- Rochester Place is not wide enough for refuse wagons
- The bin storage areas are inadequately sized and the 10m distance walk to collection point is exceeded, and is on public walkway
- The CHP servicing chamber should not be on Rochester Place
- The amenity of those living at 81-83 Camden Road and 2-12 Rochester Mews would be hugely curtailed.

5 Construction and management plans are non-existent for the specific site:

no other documents supplied. It does not describe the quantities to remove, the number of loads, the routes for traffic. What it documents, is a standard set of criteria e.g. where hoardings will be located; but with 13m piling and deep excavation for the basement alongside the 4m carriageway in Rochester Place – will the road be closed?

Adjoining Occupiers

<i>Number of letters sent</i>	455
<i>Total number of responses received</i>	15
<i>Number in support</i>	0
<i>Number of objections</i>	15

Public consultation

- 4.13 Before the representations received are discussed, it is important to note that rounds of pre-application public consultation were carried out by the Council and the applicant. This included a Development Management Forum chaired by Camden officers on the evening of Tuesday 11 June 2013, and proposals were presented to DCC and ward members at a Developer’s Briefing on 17 June. The applicant also undertook public exhibitions on Thursday 11 July (4pm – 8pm), Saturday 13 July (11am – 3pm), Monday 7 October (4pm – 8pm), Tuesday 8 October (4pm – 8pm), attended by 75 people in total. Numerous meetings were also held with local amenity groups including the North Camden Town

Neighbourhood Forum and the CAACs. Officers consider this to be an appropriate exercise in consultation with the local community.

- 4.14 Further to the above and following submission of the application, the Council displayed six site notices close to the site from 11/12/13 to 01/01/14 and the application was also advertised in the Ham & High on 12/12/13. The statutory public consultation period formally expired on 08/01/14.

Objection summary

- 4.15 Fifteen letters of objection were received from properties at Rochester Terrace, Rochester Mews, St Pancras Way, Ivor Street, Bonny Street, Bernard Shaw Court, Wilmot Place and Kentish Town Road. The concerns raised are similar in nature to those listed under the North Camden Town Neighbourhood Forum Steering Group's response above; therefore only additional points are listed here.
- Object to the demolition of the existing buildings because 86-100 St Pancras Way has strong heritage features which are inadequately represented in heritage review.
 - It is an industrial design in its lower parts, and conforms well to other light industrial sites that are desired in Camden's business policies. This part of Camden historically had quality light industry with access to materials from the canal and railways.
 - Recently, the Planning Inspectorate's review of the adjacent site 55 Rochester Place confirmed that the existing two-storey industrial premises should be retained - without a basement.
 - The proposal takes away the frontage space on St Pancras Way, which is respected by the neighbouring buildings and those opposite (the further terrace has all of College Gardens opposite and lengthy back gardens).
 - There will be overlooking and loss of sunlight to the Rochester Mews residents, the development should be only 3 storeys along Rochester Place.
 - Sunlight will also be inadequate internally within the courtyards, and lighting will be further reduced by trees. This inadequate light will be at odds with sustainability policies (for energy conservation), where natural lighting is preferred.
 - Parking needs to be built into this scheme, as residents are likely otherwise to cheat in the way others already do - to get parking places through local residents.
 - If there are to be retail units along the ground floor it would be good if there were a small local supermarket and a coffee shop as the other eateries around here are of the greasy spoon variety.
 - What happened to the idea of a school or nursery in this development?
 - The residents already have no Camden Town tube station on Sundays because of the market and the buses are packed - it is already often dangerously overcrowded.
 - The development states that local NHS GP and dentistry services are fully capable of servicing the additional residents but this does not tally with experience - these services are highly stressed.
 - The buildings should be set back from Rochester Place to allow the pavement and mews carriageway to be widened.
 - The volume of additional people will affect local residents dramatically – most notably the additional noise that will be produced.
 - The token gestures of the few so called 'affordable' residencies are, quite frankly, an insult and offer nothing in terms of community benefits.

- The profit to be made from such a large development needs to be fed back into the community, rather than going to one of the largest property developers in the UK.
- The council needs more properties on their own books – why not take this on rather than handing it over to Barratts for them to make profit from? This is a short-sighted and misguided proposal and should in no-way go forward.

Summary of 102 St Pancras Way concerns (a TV production business)

- The development is too close (5 metres) to the south facing first and second floor office windows, which would harm light, outlook and privacy for both the existing office and proposed residents.
- The flat balconies would be disruptive to the office business and also be uncomfortable for residents using them.
- The potential for overlooking into the office space may raise some security and Data Protection issues.
- The Daylight and Sunlight Report has failed to test the office windows, and in any event 72 windows tested would fail the criteria – this is high.
- The scale, height and close proximity of proposal would harmfully oppress and dwarf.
- The bin holding area on collection day could be unpleasant and attract vermin, particularly in summer months.
- The construction could harm the TV production business, which is very sensitive to noise and vibration. This would need to be carefully controlled and monitored.
- It is important to support good employers and their working conditions in the borough, the development will put the creative business under threat and less attractive to current and future business occupants.

5. POLICIES

5.1 Set out below are policy documents (including listed of relevant Council policies) that the proposals have primarily been assessed against. However, it should be noted that recommendations are based on assessment of the proposals against the development plans taken as a whole together with other material considerations.

5.2 National and Regional Policy

National Planning Policy Framework 2012

London Plan 2011 (including Revised Early Minor Alterations October 2013 and Draft Further Alterations to the London Plan January 2014)

Mayor's Housing SPG 2012

LDF Core Strategy and Development Policies

CS1 – distribution of growth

CS3 – other highly accessible areas

CS5 – managing impact of growth

CS6 – providing quality homes

CS7 – promoting Camden's centres and shops

CS8 – promoting a successful and inclusive economy

CS9 – achieving a successful Central London

CS10 – supporting community facilities and services

CS11- sustainable travel
CS13 – tackling climate change
CS14 – high quality places and conserving heritage
CS15 – parks, open spaces and biodiversity
CS16 – health and wellbeing
CS17 – safer places
CS18 – waste and recycling
CS19 – delivering and monitoring the Core Strategy

DP2 – making full use of housing capacity
DP3 – contributions to the supply of affordable housing
DP4 – minimising the loss of affordable housing
DP5 – homes of different sizes
DP6 - lifetime homes and wheelchair homes
DP13 – employment sites and premises
DP15 – community and leisure uses
DP16 – transport implications of development
DP17- walking, cycling and public transport
DP18 – parking standards
DP19 – managing the impact of parking
DP20 – movement of goods and materials
DP21 - highway network
DP22 – promoting sustainable design and construction
DP23 - water
DP24 – high quality design
DP25 – conserving Camden’s heritage
DP26 – impact on occupiers and neighbours
DP27 - basements
DP28 – noise and vibration
DP29 – improving access
DP31 – open space and outdoor recreation
DP32 – air quality and clear zone

Supplementary Planning Policies

Camden Planning Guidance (CPG) 2013

- CPG 1 – Design
- CPG 2 – Housing
- CPG3 – Sustainability
- CPG 4 – Basements and lightwells
- CPG 5 - Town centres, retail and employment
- CPG 6 – Amenity
- CPG 7 – Transport
- CPG 8 – Planning obligations

Other relevant document

Camden’s Housing Strategy 2011-2016

6. ASSESSMENT

The principal considerations material to the determination of this application are:

- **Land use principles** (see section 6.2)
- **Housing** (section 6.13)
- **Urban Design** (section 6.47)
- **Neighbouring amenity** (section 6.81)
- **Public open spaces and play space** (section 6.94)
- **Crime prevention by design** (section 6.99)
- **Basement** (section 6.100)
- **Transport, construction management and servicing** (section 6.108)
- **Waste and recycling storage** (section 6.156)
- **Sustainability and climate change** (section 6.158)
- **Trees and habitat** (section 6.168)
- **Noise, air quality and contaminated land** (section 6.173)
- **Planning obligations and community benefits** (section 6.177)

Land use principles

- 6.1 The site is currently comprised by employment floorspace, and although this has lain unused and underused for a period of time, the starting point for any redevelopment is to robustly justify any proposed loss against relevant policies CS8 and DP13. The section below considers this in detail.
- 6.2 Subject to this the employment loss justification being acceptable then the proposed replacement residential use would be strongly supported with particular regard to policy CS6 which regards *'housing as the top priority when considering the future of unused and underused land and buildings'* (Core Strategy section 6.18). Moreover as the site is located outside the Central London Area (Policy CS1) and outside a town centre (Policy CS3) any redevelopment is not required to provide a mix of uses. As such a complete residential development without any secondary uses could be supported.

Use of site

- 6.3 Before the loss is considered, it is important to ascertain the exact established use of the floorspace. In 1991 the council took lease of all accommodation within 79 Camden Road as offices (Class B1a) for the social services division. In 1994 the council purchased the freehold of the entire site (including 86-100 St Pancras Way), and at that time the basement, ground and second floors of St Pancras Way were occupied by light industrial tenants (Class B1c). These uses vacated the site before 2003 and the buildings became council office use. It is therefore reasonable to conclude that the established use of the entire site is as Class B1a offices, which total 7,188sqm GIA.

Neighbouring employment loss context

- 6.4 Some objectors cite the recent refusals and appeal dismissals at 55 Rochester Place and 3a Wilmot Place, which principally relate to a loss of B1 floorspace, as an example to resist employment loss. These decisions are fully acknowledged however each site must be assessed on its own merits. The application site under consideration here does not readily compare with this neighbour, particularly the scale is significantly larger and the layouts of buildings on site have been greatly

altered and are in a state of disrepair having been vacant since 2010. Moreover, the large number of new homes (and 50% affordable) proposed is an important contribution at borough local and strategic level. Consequently there is a different set of circumstances to be balanced here, especially given that new housing is the Council's top land use priority.

Loss of employment floorspace

6.5 When assessing the loss of employment floorspace, the requirements of Core Strategy policy CS8 and Development Policy DP13 must be considered. Although CS8 has a general presumption to resist the loss of employment space, DP13 advises that it may be acceptable change to a non-business use if:

- a) it can be demonstrated that the building is longer suitable for its existing business use, and
- b) there is evidence demonstrating that the building has been marketed for a similar or alternative business use over an appropriate period of time without success.

DP13 part (a)

6.6 Section 13.3 of policy DP13 lists 9 key requirements that should be considered when assessing whether a business use should continue or not. A change to a non-business use may be justified if the requirements are not met, which are listed and considered separately below.

- *Is the site located or adjacent to the Industry Area, or other locations for large scale industry and warehousing?* No
- *Is in a location suitable for a mix of uses including light industry and local distribution warehousing?* Yes, subject to significant refurbishment
- *Is easily accessible to the Transport for London Road Network (TLRN)?* Yes, Camden Road is part of the TLRN
- *Has potential to be serviced by rail or water?* No, vehicular only
- *Has adequate on-site vehicle space for servicing?* Yes, only for small vehicles but not large / heavy goods vehicles
- *Is well related to nearby land uses?* No, the majority of surrounding uses are noise/vibration/pollution sensitive residential uses. Therefore industrial or warehousing would not be appropriate, only office or light industrial would be appropriate
- *Is in a reasonable condition to allow the business use to continue?* No, a full survey has been carried out which demonstrates significant disrepair and neglect, dated services, significant asbestos present and poor building fabric in regards to thermal insulation and energy efficiency
- *Is near to other industry and warehousing, noise/vibration generating uses?* No.
- *Provides a range of unit sizes for small businesses (under 100sqm)?* No.

6.7 Out of the 9 requirements listed, the current building fails to meet 6. Consequently a strong justification exists for potential redevelopment to a non-business use.

6.8 In support of the policy DP13 requirements, Camden Planning Guidance 5 (CPG5) goes further to categorise employment sites in the borough. Category 1 is the highest quality, most rare and will always be protected. Category 3 is the lowest

quality, most common and once empty are generally in need of significant investment to bring back into viable use. Following an inspection by officers, the buildings and site can reasonably be categorised between 2 and 3. Importantly, a consideration under Category 3 is to include sites that have become vacant and require significant investment to make them attractive for continued business use. This is applicable to this site and to help demonstrate the investment needed the applicant has provided a feasibility cost estimate for two options including a light refurbishment (essential works) and a comprehensive refurbishment totalling £8.85M and £9.13M respectively. This is a reflection on the poor condition of the property and the works required to bring it up to modern standards. Necessary external works would include a new roof, new / refurbishment of all windows and doors, internal works would include full strip out of the warren of internal corridors and partitions, complete redecoration, new raised floors, new passenger lifts, new mechanical and electrical servicing throughout, a disabled WC at ground and new WCs and kitchenettes on all floors and new reception area.

- 6.9 In summary, the requirements of policy DP13 part (a) and guidance under CPG5 demonstrate that there is limited potential for a business use to continue in the building in its current state. For it to be attractive for modern day occupants a significant refurbishment would be necessary.

DP13 part (b)

- 6.10 Both parts (a) and (b) must be satisfied in order to justify a change to non-business use. As such the applicant instructed a marketing exercise by Drivers Jonas Deloitte dating from May 2011. Based upon pre-planning advice received from the council at that time, the marketing report highlighted the physical features and current condition of the building so that potential business use operators were fully aware of its potential for a re-occupation for business use. The report also advised that a change of use to residential was a possibility. In response, strong interest was received mainly from residential developers that included 210 requests for brochures and 122 were provided with secure information packs. Eventually, 23 offers were made with none on the basis of retaining any employment uses on the site. Although the marketing report did not specify the exact rental levels or lease arrangements for prospective business use, this exercise has nonetheless demonstrated that there was no demand from the open market to either retain, reuse or redevelop the building or site for a similar or alternative business use.

Loss of employment floorspace - conclusions

- 6.11 It is acknowledged that the site owner could undertake refurbishment works to make the building attractive for business tenants. However in light of the site not meeting many of the DP13 requirements for an attractive business use location or condition, and by virtue of it falling under CPG5 Category 2/3, it would be unreasonable to request that the owner undertakes such a significant investment and risk. To request this could inappropriately result in significant piece of unused and underused land to continue lain vacant, whereas it could otherwise be redeveloped for an alternative use. In this case housing and affordable housing which is the council's top land use priority.
- 6.12 Officers are therefore satisfied that the existing buildings on the site, in their current form and physical state of repair, are not suitable for a business use to continue,

whether that is office or light industrial. This is further evidenced by the lack of interest from potential business occupants during the marketing campaign. The complete loss of the employment floorspace on this particular site is therefore accepted and is in general compliance with policies CS8 and DP13.

Housing

- 6.13 Core Strategy policy CS6 frames housing as the Council's top land use priority, stating that the supply of homes shall be maximised, and in support Development Policy DP2 expects the maximum appropriate contribution to the supply of housing on sites that are underused or vacant, as is the case here. Consequently, the provision of 17,036sqm GEA floorspace (166 new housing units) on this site is strongly supported. This is subject to other factors such as affordable housing provision, mix, density and quality, all of which will be assessed separately below.

Affordable housing

- 6.14 Development Plan policy DP3 expects all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing. When negotiating on individual private residential and mixed-use schemes the council will seek a target of 50% of the total housing floorspace to be affordable. Policy DP3 also recognises factors relating to the individual circumstances of a site taking account of site costs and constraints, the availability of public subsidy, financial viability and other scheme requirements that will affect the scale, nature and location of affordable housing. Where a proposal does not meet the affordable housing target submission of a financial viability appraisal will be required to justify the lower proportion proposed.

The affordable housing offer

- 6.15 This application proposes 166 residential flats (17,036sqm GEA) including a mix of market, affordable rent and intermediate. The policy DP3 requirement would require 50% of the proposed residential floorspace to be affordable, which equates to 8,518sqm. A total of 8,574sqm (equalling 84 homes) is proposed onsite which meets the policy DP3 floorspace percentage requirement. In circumstances when the onsite floorspace requirement is met, a financial viability appraisal is not usually necessary under DP3. However, should this floorspace comprise housing mix that falls considerably short of the council's important housing mix policies, a full appraisal and subsequent verification would be absolutely necessary. This is outlined in CPG2 section 2.62. The proposed housing mix will be discussed separately below. Unlike policy DP3, the London Plan policy 3.12 does not set a benchmark percentage requirement, and instead expects the 'maximum reasonable amount' of affordable housing on individual sites. As such the GLA has requested the submission of a viability appraisal and its subsequent independent verification.
- 6.15 The 84 units would be spread across blocks A, B and C that enclose, overlook and access the western courtyard. The affordable blocks would also have access to the communal roof terrace above blocks A and B. The affordable housing has been designed to be tenure blind i.e. the external appearance of the affordable housing elements are of the same quality as the market housing.

Tenure split

6.14 Core Strategy policy CS6 targets 60% of affordable housing to be for social rent (now superseded by affordable rent) and 40% to be intermediate provision by floorspace. Proposed is 5,116sqm affordable rent and 3,346sqm intermediate, which is which is compliant with the 60:40 tenure split requirement.

Housing mix

6.19 Development Plan policy DP5 and CPG2 expects all residential developments to contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes, as set out in the 'Dwelling Size Priorities Table' below. The sets out the current mix alongside the priorities of the three tenures, including the percentage requirements that are particularly important for the affordable rent tenure.

	Affordable rent	Dwelling size priority	Inter-mediate	Dwelling size priority	Market sale	Dwelling size priority
Aim		50% large*		10% large		40% 2-bed
1 bed	11 (23%)	Lower (20%)	23	Medium	16	Lower
2 bed	24 (54%)	Medium (30%)	15	High	60	Very High
3 bed	8 (17%)	High (30%)	0	High (10%)	0	Medium
4 bed	3 (7%)	Very high (20%)	0	High	0	Medium
	46		38		82	

**For affordable rent, 50% is the overall aim for large units (3 and 4-beds), to be set at traditional social rent levels*

6.26 With regards to the affordable rent tenure, the 3 and 4-bed provision falls significantly short of the requirements. Moreover, these units combined make up only 24% of the overall affordable rent provision, or less than half of the 50% large unit requirement. This under provision is a fundamental concern, and cannot be justified. The provision of 2-bed flats is also excessive at nearly double the requirement; however this could be justified, but only on balance if the top priority of large unit affordable rent numbers were to be increased.

6.27 The intermediate tenure is heavily weighted 1-bed units which have only a 'medium' priority, and there are no large units provided despite the 10% requirement. This is a concern. However, unlike the affordable rent tenure, a greater degree of flexibility can be applied to the intermediate tenure particularly in the context of a 50% onsite affordable housing offer being pursued. On balance the proposed intermediate mix could be justified, but only if the top priority of large units in the affordable rent tenure were increased.

6.28 Finally, the market unit mix generally accords with the policy requirements, with less 1-beds and a very high number of 2-beds. Ideally there should be some larger units provided given there is a 'medium' demand, however as discussed above a degree of flexibility could be applied for similar reasons.

6.29 Overall, only 17 large units are provided across the 166 unit development, or 10%. This is an unbalanced mix with an unsupportable lack family housing for the site, and would fail to provide a mixed and inclusive community contrary to policy DP5 and CPG2. It is acknowledged that the development would provide a good level of

onsite amenity space, including under-5 playspace, and is well served by public open spaces and schools; consequently it should contain a greater level of larger units and there are no practical constraints as to why this cannot be achieved.

- 6.30 In conclusion, Planning and Housing Officers have a fundamental objection to the proposed lack of large units, particularly in the affordable rent tenure where there is a pressing need. Policy DP5 is further supported by the Council's Housing Strategy 2011-16, which confirms that "*larger social rented homes are in especially short supply*" in the borough (Chapter 3, page 12), the London Plan 2011 stating "*there is a particular need for social rented family homes*" (para. 3.47) and the Mayor's Housing SPG stating that "*there is a particular challenge in meeting the housing requirements of families for affordable accommodation... This is underscored by the number of overcrowded households in London... The problem is particularly acute in social rented housing*" (para. 3.1.19). Consequently the proposal is recommended for refusal on the grounds of an unacceptable housing mix (policies CS6, DP5 and CPG2).
- 6.31 Furthermore, although 50% affordable housing floorspace is proposed onsite, the unacceptable housing mix necessitates submission of a financial appraisal that must also be independently verified. A viability appraisal, and its subsequent verification, is crucial to demonstrate the maximum reasonable number of larger affordable rent units that could be provided within the 50% affordable housing offer, whilst still promoting a viable scheme. Refusal is thereby also recommended in the absence of this viability information.

Density

- 6.32 The site is located outside the designated Central London part of the borough, but has an inner London urban character by virtue of it being on the edge of Camden Town (designated as a Major town centre in the London Plan) and fronting busy trunk roads of St Pancras Way and Camden Road. Moreover, with a Public Transport Accessibility Level (PTAL) of 6, the site should expect a density to range somewhere between 215 - 405 u/ha as outlined under policy 3.4 of the London Plan. A total of 166 flats are proposed, which equates to 395 u/ha on a 0.42 hectare site. This sits within the density range and is therefore appropriate for the site and surrounding context. The provision of housing on the site has been optimised in line with policies CS1 and DP2.

Quality of new residential accommodation

- 6.33 Development Plan policy DP26 requires residential developments to provide an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes, amenity space and an internal living environment which affords acceptable levels of sunlight, daylight, privacy and outlook.
- 6.34 With regards to dwelling and room sizes, all 166 flats would meet, with many exceeding, the minimum space standards set out in the Mayor of London's Housing SPG. The standards in this guide exceed Camden's own Planning Guidance, for example Camden requires 48sqm for a 2 person flat, whereas the SPG is 50sqm. The application of the Mayor's SPG is welcomed. All flats would also have usable layouts to maximise functionality and liveability for future occupiers.

Outlook and enclosure

- 6.35 In terms of outlook 129 of the 166 units (78%) would enjoy dual aspect, which is positive for higher density developments in urban locations. Most of the single aspect units are 1-bed flats and only 5 are directly north facing. Overall, the scheme offers a high quality outlook to prospective residents.

Privacy

- 6.36 For windows on the outer facades there is no opportunity for direct overlooking given that they would face onto the public highway. The dimensions of the courtyards have been carefully considered to measure 18 x 18m thereby meeting the BRE18m guidance for separation between habitable room windows of flats that directly face each other. There would be instances of oblique overlooking between habitable room and balconies of perpendicular courtyard elevations; however this relationship is unavoidable and would not be harmful enough to justify a refusal. There are habitable windows on the elevations of the 7.5m wide courtyard gaps; however they are generally placed as to not directly face each other. The layout has been positively designed to maximise privacy for prospective residents.

Daylight and sunlight

- 6.37 The application includes an independent Daylight and Sunlight Report by GIA, which has been carried out in line with the BRE's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011 as amended).

Daylight

- 6.38 Officers worked closely with the architect and GIA to ensure that the development was designed in a way to maximise internal daylight opportunity. This included not locating habitable windows in areas of least daylight potential such as the ground level facing 102 St Pancras Way, careful location of projecting balconies, maximising size of windows facing courtyards and designing flat layouts carefully by positioning room that require more daylight in areas of greatest daylight potential. As a result of this process, 428 of the 500 proposed residential rooms tested pass the Average Daylight Factor (ADF) test, or 86%. This is considered a high pass rate for an urban site whereby residential density has been optimised.
- 6.39 Rooms that would experience levels below the recommended ADF include 27 living rooms. The guide for these rooms is 1.5% ADF, and only 7 of the 27 would fall below 1%, which are generally located at the lower ground level facing the internal courtyards or at ground level facing the mews. Important to note however is that all these living rooms are located within dual aspect duplex units which offer greater amenity opportunity in terms of outlook and having their own front doors. On balance this overcomes the lower level of daylight and such units may be a preference for many occupants. With regard to bedrooms a total of 33 would fall below the 1% ADF recommendation with the majority of these being only a minor transgression at 0.2% below. Importantly, these rooms have been carefully located to the internal courtyards and would thereby experience good outlook and quietness from road traffic which would normally be a greater attraction for occupants. It is considered that the development offer a good level of daylight for prospective residents.

Sunlight

- 6.40 All windows facing within 90 degrees due south have been assessed for their Annual Probable Sunlight Hours (APSH). The BRE states that living room and kitchen windows require most sunlight and the assessment demonstrates that the vast majority of these windows would achieve levels comfortably exceeding the summer and winter targets of 25% and 5% respectively. The windows that fail are unsurprisingly located at the lower levels of the internal courtyards. To help mitigate this, living room and kitchen locations have been maximised on the outer facades where possible. Unfortunately in achieving a policy compliant mix of units sizes across the development it is not possible to locate all of these windows on the outer facades. Consequently there are 8 living rooms / kitchens at lower ground, ground and first floor courtyard levels that would have limited sunlight. By contrast the number of bedroom windows located at these levels is significantly greater, which demonstrates that the internal layout has been carefully considered across the entire development.
- 6.41 In summary, overall the scheme would provide a high proportion of flats that would achieve a good level of outlook, privacy, daylight and sunlight. Officers are satisfied that the internal layouts, balcony and window locations have been carefully considered to maximise amenity potential. The small number of habitable rooms that fall below recommended BRE guidance are far outweighed by the significant number of rooms that exceed the guidance. The development is thereby policy DP26 compliant.

Quality of the courtyards

- 6.42 Given the sites high exposure to two heavily trafficked and noisy roads, an important aspiration of the development was to provide communal amenity spaces that would offer a safe and quiet environment for residents. The most effective design solution in this instance was to create two courtyards that were predominantly surrounded by the built form. Each courtyard would measure 18m x 18m thus creating a large outdoor space and each would have a 7.5m wide gap to allow views in an out to sensitively reduce the sense of enclosure. The courtyards have been carefully sized to allow for excellent levels of outlook, quietness and privacy for the residential windows that overlook. However by their very nature it is also acknowledged that the ground would be significantly overshadowed for the majority of the year.
- 6.43 The courtyards have been assessed against the BRE recommendation (at least half of an amenity area should receive at least 2 hours of sunlight on 21 March) and results indicate that the courtyards would only receive up to 3 hours on 21 June (summer solstice when sun is at its highest altitude). For the courtyards to meet the 21 March guidance the development would have to be significantly reduced in height. However, in having a main responsibility is to provide calm and sheltered environment it would be a poor design response to reduce the scale. Moreover, on highly accessible edge of centre urban sites like this, the development density must be optimised in the interests of sustainable development. As discussed under paragraph 6.32 of this report, the development would achieve an optimum density. Additionally, the elevations facing the courtyards would include a high proportion of glazing and light coloured facing bricks in order to maximise light reflection and would include high quality landscaping schemes to make them an attractive environment to overlook and relax within. It is considered that each courtyard

would offer the right balance between a calm and bright outdoor environment and quality of internal amenity to be enjoyed by the future residents.

Amenity space

- 6.44 In addition to the two courtyard spaces discussed above, the development also provides 426sqm of amenity in the form of two roof top communal gardens, one serving the affordable and one serving the market units. Both spaces would receive excellent sunlight all year round so provide a sunny alternative to the courtyard spaces below, and include playspace for under-5s totalling 110sqm. All 166 units would include a private balcony or terrace, with the ground level duplex units (predominantly for families) having private rear gardens backing onto the courtyards. The private amenity equates to 1,950sqm. The combination of courtyards, roof top gardens and private amenity should provide a comfortable and inclusive living environment for future residents.

Inclusive design

- 6.45 The Access and Inclusivity Statement accompanying the application demonstrates that all flats would meet lifetime homes standards in accordance with policy DP6, and a condition would be secured. Each of the 6 residential cores would also be served by a 1400mm wide by 2100mm long lift with inclusive access to the courtyard spaces and roof top amenity areas.
- 6.46 Policy DP6 requires a minimum of 10% of flats to be suitable or easily adaptable for wheelchair users. For this development a total of 17 such flats are required. A total of 8 are provided in the private tenure and 9 in the affordable tenure, with the exact layout yet to be agreed. The public pathways surrounding the site, including along Rochester Place, would be designed and constructed to allow comfortable use by a wheelchair. The proposal therefore complies with policy DP6.

Urban design

- 6.47 The form and appearance of new development, its layout and relationship to its surroundings are important considerations for planning proposals in Camden. Pursuant to Core Strategy policy CS14 and Development Policies DP24 and DP25 all new development should be of the highest standard of design, respect local context and character and preserve and enhance Camden's heritage assets.

Site and context

- 6.48 The site is on a prominent junction between Camden Road and St Pancras Way. It comprises a 4 storey 1960s block fronting onto Camden Rd and a part 2 part 3 storey building with a frontage set back from the boundary with St Pancras Way. The building backs onto Rochester Place. This building was purpose built in the late 1920s/early 1930s for the manufacture of high quality optical instruments and operated by Hilger Ltd.
- 6.49 The immediately surrounding townscape is of varied character and scale. To the north west of the site, still forming the same block formed by Camden Road, St Pancras Way, Rochester Place and Wilmot Place is 102 St Pancras Way immediately adjacent to the site. This is a 3 storey brick building on St Pancras Way stepping up to 4 storeys on Rochester Place and further north an apartment

block at 3 storeys, with frontages onto Wilmot Place, St. Pancras Way and Rochester Place. Opposite the site on St Pancras Way is a 5 storey 1960s brick built Council block (Bernard Shaw Court). Opposite the site on Camden Road is an area of open space forming part of the St Pancras Way estate and a 6 storey brick built Council block. Diagonally opposite the site is a single storey garage.

- 6.50 The site is not is a conservation area but is closely adjacent to 4 conservation areas, namely:
- Camden Broadway Conservation Area to the south of the site taking in the southern corner of the junction and the garage site.
 - Jefferys St Conservation Area to the west and south west of the site
 - Rochester Conservation Area to the north west and north of the site
 - Camden Square Conservation Area to the north east of the site
- 6.51 These conservation areas define the characters of the wider surrounding area where the pattern of nineteenth century development remains relatively cohesive. However, to the north east of the site along Camden Road (particularly on the northern most side) are a number of more recent buildings of varying quality architecturally.
- 6.52 Listed buildings in the vicinity include: (1) the terrace at 108-132 St Pancras Way, to the west/north-west and within the Jeffrey's Street Conservation Area; (2) a drinking fountain memorial to Joseph Salter, on Royal College Street to the west/north-west and within the Jeffrey's Street Conservation Area; (3) a K2 telephone kiosk, at the junction of St Pancras Way and Royal College Street, to the west/north-west and within the Jeffrey's Street Conservation Area; and (4) 157 and 159 St Pancras Way, including their railings, to the south/south-east and within the Camden Broadway Conservation Area.
- 6.53 The Hilger works building was considered for the local list of non-designated heritage assets but was not considered to meet the criteria for selection. Whilst it is acknowledged that the building has some merit, historically and architecturally, the relative significance of these attributes are not considered to provide a strong enough case for the retention of the building either wholly or in part. If proposals for the replacement can be demonstrated to provide a sufficient enhancement of the site and its surroundings then demolition would be considered to be acceptable. The cobbles along Rochester Place are listed as non-designated heritage assets.

Site layout

- 6.54 The proposed layout takes the form of an 'S' type shaped layout to provide strong frontages along the site's edges. The frontage on St Pancras Way is pulled towards the pavement edge whilst at the same time allowing for widening of the pavement, in parts, and the creation of light wells to the lower ground floor accommodation. This creates a building line and light well condition broadly equivalent to that of the listed Georgian Terrace further along St Pancras Way opposite College Gardens.
- 6.55 On the Camden Road frontage, the existing building line is followed to accommodate existing street trees. On the Rochester Place frontage the building line is pulled back to the building line of the rear of 102 St Pancras Way.

- 6.56 The creation of lower ground floor and ground floor duplexes on the street frontages, along with a number of core entrances on each frontage, positively allows for active street frontages. A concierge facility is also located on the St Pancras Way frontage which provides access to the eastern courtyard and an arrival point for visitors. The single storey structure also provides an acoustic buffer to traffic along St Pancras Way.
- 6.57 The S shaped plan creates two courtyards which provide a quieter, calmer aspect to the apartments, particularly those which have a through aspect i.e. one onto the road frontage and the other onto the courtyard. The courtyards are therefore appropriately sized and laid out to act as important areas of quiet calmness in contrast to the busy road frontages. They will also allow for a high number of dual aspect flats, provide a good level visual amenity and a degree of recreational amenity for residents that pass through them.

Height and massing

- 6.58 Camden Road and St Pancras Way comprise a consistent five storey parapet on (17m high approx.) with two additional set back storeys on the Camden Road frontage (23m high to rooftop) and one on St Pancras Way (19.8m). These heights, particularly the 17m parapet, are generally commensurate with other larger buildings facing these wide roads, including Bernard Shaw Court (14.7m high) and the St Pancras Way estate (19.6m high). Moreover, the scale is an appropriate response to the prominent and busy road juncture. On the Rochester Mews frontage, the parapet reduces to four storeys (12.6m) with a fifth storey set back (15.7m) to respect the smaller scaled neighbours located opposite, which include 2-12 Rochester Mews (9.5m) and 26-28 Rochester Place (14.3m). The overall massing of the building has been carefully modelled to respond to the differing contexts of the site.
- 6.59 The layout and massing create a composition of base, middle and top with ground and lower ground floor duplexes forming the base, the remaining four storeys the middle and the setback roof storeys the top. This tripartite horizontal sub division provides a contextual response to Georgian and Victorian properties exhibiting similar characteristics close by.
- 6.60 This horizontal expression is balanced by vertical sub divisions of facades, defined by recessed balconies, facing Camden Road, St Pancras Way and Rochester Place. A finer grain of vertical expression is added by grouping 1st and 2nd, and 3rd and 4th floor windows at double height. The 6th and 7th set back storeys are treated similarly.

Architectural detailing

- 6.61 The double height windows openings referred to above are framed by a soldier brick course top and bottom and with a square brick detail down the sides which add visual interest and texture to the façades as well as adding to the buildings vertical expression.
- 6.62 Window frames are recessed corresponding to the detailing of window openings of historic properties close by. Window spandrels and panels are micro profiled to provide an additional level of visual interest and texture to the façade.

- 6.63 At the ground floor the window and door frames are set back to provide an added buffer to activity on the street. This set back also reveals the brick piers providing stronger emphasis to the base of the building
- 6.64 Appropriate internal daylight and sunlight conditions for the flats require full height windows at the ground floor. In order to avoid a commercial appearance at this level, the window panels are broken down by timber framing into smaller units of more domestic scale.
- 6.65 Whilst the detailed design of the balcony balustrades are under design development and will be the subject of a condition, the objective of a series of design studies have been to create balcony balustrades which provide a further layer of visual interest and support the domestic character and identity of the elevations. On the Camden Road and St Pancras Way frontages, parapets to the balconies are raised to increase privacy. A metal balustrade is overlaid to on the glass balustrade to provide added screening, visual interest and texture.
- 6.66 The designs of the elevation facing the Rochester Way take on a different character in response to the change in scale of the mews-style street and surroundings. The parapet is four storeys high with a fifth set back storey. The proposed lower ground and ground floors would be similar in character to the Camden Road and St Pancras Way frontages, however the upper storeys are cantilevered rather than supported on piers. The balconies to the 1st and 2nd floors project forward of the elevation to the building line and add interest and animation to this frontage in views along Rochester Place. The balustrade details comprise of a patterned and perforated metal which provide privacy, visual interest and respond to the more industrial character of Rochester Place. A similar approach of using patterned and perforated metal is proposed for the Bin Store walls and openings, which is appropriate.
- 6.67 The designs of the facades to the internal courtyards are intended to respond to the quieter, calmer and differing character of these spaces. The offset pattern of window openings and varied disposition of window, screen and Juliet balcony within the openings provides a more informal character.
- 6.68 The proposed materials are a response to their location and context, particularly the nature of the road frontages and industrial heritage. Brick is proposed as the predominant façade material with metal as a secondary material. The proposed brick for the street frontages is a textured mid grey colour with metal window and balcony details in dark grey. The proposed brick and metal details for the courtyard are a lighter colour. The metal for the roof storey feature hoods is proposed to be Cor-ten steel (weathering steel developed to eliminate the need for painting and form a stable rust-like appearance if exposed to the weather for several years) which references the former industrial heritage of the site and provides added texture and colour to the overall building composition. Cor-ten is also proposed for the entrance cores.

Verified views

- 6.69 View 1 looking north east along Camden Rd: This shows how the trees on the pavement on the Camden Rd frontage aid in placing the building in the wider landscape/townscape. This view also shows the correspondence of the 5th storey parapet height of the building with the neighbouring building heights at the junction. The double height set back roof storey, both in terms of its articulation and material, provides visual interest on the skyline.
- 6.70 View 2 looking back from the junction of St Pancras Way and Camden Rd looking northwest along St Pancras Way: This shows the relationship of the 5th storey parapet heights with Bernard Shaw Court on the opposite side of St Pancras Way. It also shows the defined base, middle and top of the building. The vertical articulation is also clearly apparent.
- 6.71 View 3 looking south east along St Pancras Way: This shows the relationship of the proposed 5th storey parapet height with Bernard Shaw Court on the opposite side of the street, which provides strong enclosure to St Pancras Way as it reaches the junction. The correspondence in materiality (brick) is also apparent. The defined base, middle and top and vertical articulation of the building are also clearly apparent.
- 6.72 View 4 looking south east along Rochester Place: This shows the change in character of the building frontage in response to the mews like character of Rochester Place with a 4 storey parapet, cantilevered 1st, 2nd and 3rd storeys, projecting balconies and window openings which correspond with the scale and simplicity of window openings on neighbouring buildings.
- 6.73 View 5 looking south west along Rochester Mews: This shows the respectful relationship of the 4 storey parapet to the 4 storey height of 26-28 Rochester Place. The view into the courtyard extends and closes the view along Rochester Mews. The differing architectural expression of the courtyard facades, with a more informal character, provides an added layer of visual interest in this view.
- 6.74 View 6 looking south west along Camden Rd: The clearly articulated roof scape provides a marker above the tree line to the junction and cross roads of Camden Rd and St Pancras Way. When these deciduous trees are not in leaf more of the building will be apparent. Some necessary pollarding will also affect the view.
- 6.75 View 7 looking south west along Camden Rd: This is from the junction of Camden Rd with Murray St (taken further north than View 6) is at the edge of the Camden Square Conservation Area. It shows the outline of the building in relation to the tree line where the roof line will be visible in this view during the months when the trees will be in leaf. More of the building will be visible when the trees are not in leaf as with other buildings along the northern most side of Camden Rd. The line of trees provides a unifying feature to the built townscape.
- 6.76 View 8 looking south from Rochester Rd across Rochester Terrace Gardens: This is taken from within the Rochester Conservation Area. The roofline of the proposed building is partially visible in the summer and will be more visible when in the winter; however the roofline will be read as part of the wider varied roofscapes.

- 6.77 View 9 looking south east from Royal College St towards St Pancras Way: This is taken from within the Rochester Conservation Area and shows the listed terrace, 108-132 St Pancras Way, in the foreground to the left of the image. Also shown is the listed telephone kiosk and drinking fountain adjacent to the tree in the centre of the image. The view indicates that the proposed building will be visible, in part, further back in the view along St Pancras Way. The listed terrace maintains its prominence and is considered that there is no harm to the setting of the heritage assets in this view.
- 6.78 View 10 looking east along Ivor St towards Royal College St: This view is taken from within the Jeffreys St Conservation Area. A small part of the roof storey may be visible when the trees are in leaf. The impact of the limited visibility of the proposals in this view is considered to be negligible.
- 6.79 View 11 looking south east along Rochester Place opposite the junction with Reeds Place from within the Jefferys St Conservation Area: The proposed building will be visible towards the southern-most end of the mews. However the degree of visibility is considered to be limited and not harmful to the character of the mews.

Conclusion

- 6.80 The settings of adjacent heritage assets would be preserved and the proposals are considered to make an appropriate response to the site and its surroundings in terms of its layout, varied heights, sculptured massing and architectural detail. The scale of building is also appropriate for this prominent site that fronts the juncture of two busy roads. The building is considered to be of high architectural quality and design detail and would provide an enhancement the surrounding townscape.

Neighbouring amenity

- 6.81 Core Strategy policy CS5 and Development Policy DP26 seek to ensure that the existing sensitive residential amenities of neighbouring properties are protected, particularly with regard to visual privacy, outlook, daylight and sunlight.
- 6.82 The application is accompanied by an independent Daylight and Sunlight Report, which has been carried out in line with the BRE's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011 as amended).
- 6.83 The neighbouring residential properties that could be affected includes: 1-40, 104 and 189 St Pancras Way; 15 and 16-30 Wilmot Place; 26-28 Rochester Place; 2-12 Rochester Mews; 81-83 Camden Road; 1-36 Soane Court and 1-24 Hogarth Court.

102 St Pancras Way

- 6.84 A detailed objection was received from the office occupant at 102 St Pancras Way, who operates a TV production business. This building has a number of windows at first and second floor levels that would overlook the development (a distance of 5m approx.) and there is concern that these were not tested for daylight and sunlight. Section 2.2.2 of the BRE guidance states that *"the guidelines may also be applied to any non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices"*.

6.85 It is not considered that TV production activities are reliant on the presence of natural light. The business operator's principal and detailed concern relate to how 'noise and vibration' can impact on the 'exacting requirements' of TV production activity. Whereas daylight reduction is solely linked to an employees and visitors experience within the building. Daylight would be affected, but not to the extent that the practical requirements of TV production activity would be harmed, which is completely different to the daylight needs of a habitable dwelling.

Daylight

6.86 Windows serving the surrounding residential properties listed above have been assessed under the BRE's Vertical Sky Component (VSC) and No Sky Contours (NSC). The VSC is a measurement that represents the amount of available daylight from the sky received at the outside face of any window being tested. The BRE has determined that a VSC figure can be reduced by up to 20% (0.8 of its former value) before the daylight loss is materially noticeable. The BRE regards a VSC value of 27% is to provide a good level of daylight, regardless if a reduction exceeds 20%. Should VSC fail then the more technical NSC test can be employed. Here the actual layout of the affected room is known and tested for daylight distribution. Like VSC, the NSC figure can be reduced by up to 20% before the daylight loss is materially noticeable.

6.87 Of the 300 windows tested for VSC, 215 would pass or 72%. For a highly urbanised and accessible part of London, where development densities are to be optimised, this is considered a good pass rate. Moreover, the VSC test concluded that all windows serving 104 and 189 St Pancras Way; 15 and 16-30 Wilmot Place; 81-83 Camden Road and 1-36 Soane Court would pass. The buildings that were most affected are discussed below.

6.88 The 1960s block of flats at 1-40 St Pancras Way to the west, (Bernard Shaw Court) would be most affected. Of the 120 windows assessed, 55 (or 46%) would pass. Of the 65 that did not, the majority (72%) would retain good levels of light between 20-27% VSC. Moreover, a total of 26 Windows would experience a loss just beyond the 20% BRE guide (<25%), 32 windows at 25-30% loss and 7 windows at 30-33%. In respect of NSC, 70 of 115 rooms tested pass. Of the 45 rooms that fall short 43 would still experience a daylight distribution of over 40% of the room's area. Whilst noticeable, this is not considered a harmful loss to justify refusal on daylight grounds, moreover a line of large trees fronting this building have not been assessed and its highly likely that these already impact on the light levels achieved to this neighbouring building.

6.89 The recent development at 26-28 Rochester Place, just to the north of the site, would also be affected. This building has residential windows on the first, second and third floors. Of the 28 windows tested 16 would pass VSC. Of the 12 windows that fall short, 8 of these are serving rooms that have multiple windows that would allow good light levels. For the remaining 4 windows, one would pass NSC with 3 experiencing 23.9-34% loss. Whilst noticeable, this is not considered a harmful loss to justify refusal on daylight grounds.

- 6.90 At 81-83 Camden Rd and 2-12 Rochester Mews, 16 of the 19 windows tested would pass VSC, with all windows passing NSC. At 1-24 Hogarth Court, 19 of the 24 windows tested pass VSC. The 5 windows that fail are directly located a deep balcony overhang that already have poor VSC levels at around 12%. Therefore a 3% loss appears disproportionate and would not result in significant harm.

Sunlight

- 6.91 In terms of sunlight availability, only 26-28 Rochester Place and 2-12 Rochester Mews would be affected. At the former 7 of the 8 rooms tested would pass Annual Probable Sunlight Hours (APSH), in that they would either retain 25% of APSH annually, 5% APSH in the winter months, or not be reduced by over 20% in either period. The window that did not meet APSH would still retain 35% of APSH annually. For the latter, 7 out of 10 rooms tested would pass APSH. The 3 affected rooms retain between 39-45% APSH, hence good sunlight levels.

Outlook and privacy

- 6.92 The negligible impact on neighbouring light also demonstrates that there would be negligible harm on outlook. The closest neighbours on Rochester Place and Rochester Mews are all located a sufficient distance (across a public highway) to ensure their outlook will be maintained. Moreover, the massing of development along the narrow Rochester Place has been considered so that it would be four storeys with fourth floor setback. This proportion is respectful to amenity.
- 6.93 In terms of privacy, only 26-28 Rochester Place has habitable windows directly facing the development at a close proximity (approx. 7m). The proposed windows serving block A would lead to an increase in overlooking, however this would be across a public highway and as such there are no policies or guidance to prohibit such a relationship. Moreover, this relationship across narrow mews style public highway routes is commonly experienced in Camden and London generally, particularly in the more central and urbanised areas like this. In summary the proposal would not unduly harm any neighbouring outlook or privacy.

Public open spaces and play space

- 6.94 Core Strategy policy CS15 outlines the strategic need to ensure that the growth in the numbers of residents and visitors in Camden will be supported by increases in public open space provision. Development Policy DP31 sets the strategy on how this open space should be provided, stating that the provision of public open space within a development site is the priority, with off-site provision second, and in circumstances where it's not practically possible to provide public open spaces on or off-site that the Council would accept the least preferred third option of a financial contribution towards other public open spaces in an area. CPG6 section 11 provides detail on this hierarchy and the formula for calculating contributions.
- 6.95 The site itself is not located within a Public Open Space Deficiency area (policy CS15 Map 7) and is in close proximity to two existing public open spaces of College Gardens and Rochester Terrace. The necessity for public open space provision onsite is therefore lessened. Based upon the CPG6 formula the development would require 2,704.5sqm of communal open space. A total of

914sqm of communal space would be provided onsite in the form of two courtyards and two roof-top gardens. Whilst this is less than the policy requirement, the proposal also includes a significant area of private garden and balcony space (1,950sqm). This private provision can assist in ameliorating the communal space shortfall. Striking the correct balance between open space provision and built footprint is particularly important if the optimum density of new housing is to be achieved. Officers are satisfied that this balance has been met. Any reduction in built footprint, in order to create more open space, would not make a sustainable use of the site.

- 6.96 Considering that the open space on site would only be available for onsite residents then a full financial contribution towards off-site public open spaces is also justified. Based on the CPG6 formula this equates to £210,310 to be secured in the s106 and would be invested into improving nearby open spaces. The combination of private open space provision on site and the full financial contributions to public open space off-site is in full accordance with policy CS15 and DP31.
- 6.97 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG. Using the methodology within the Mayor's SPG, the development is expected to be home to approximately 62 children, 27 of which are expected to be under-five years old. In accordance with the Mayor's SPG, the development is therefore required to provide, as a minimum, 270sqm of door-stop play provision for the under-five's.
- 6.98 In recognition of the greater number of children expected as part of the affordable element (24 of the 27 under-five's are expected to be housed within the affordable provision), the communal roof-top terrace provided for the affordable units is considerably larger than that for the private units, at 293sqm. This terrace has been designed so as to provide dual-use general residential amenity space, as well as play space, with the landscape design utilising natural features to facilitate play.

Crime prevention by design

- 6.99 Policy CS17 expects new developments to include measures that would improve community safety and promote safer streets and public spaces. As such the proposal was developed in close consultation with the Crime Prevention Design Advisor who advised on the principles of 'Secured by Design' and 'Designing out Crime'. The application has adopted these principles and will secure accreditation at detail design stage. This is supported and a CCTV and external lighting strategy will also be secured by condition.

Basement

- 6.100 Development Policy DP27 states where a basement development is deeper than one full storey below ground level (3 metres in depth) the Council would require evidence, including geotechnical, structural engineering and hydrological investigations and modelling to demonstrate that basement developments do not harm the built and natural environment or local amenity. This evidence forms part of a Basement Impact Assessment (hereinafter a BIA) that at the very minimum

contains a screening exercise, to determine whether further scoping, site investigation or technical evidence is necessary. This is to ensure that basement developments do not harm the built and natural environment or local amenity.

- 6.101 The existing building has two areas of basement. One is located beneath the western wing of the St Pancras Way building and one is located beneath 79 Camden Road. The proposal includes an excavation of the entire site to include a lower ground level to all the blocks and the two central courtyard at the same level, which is approximately 4m below the surrounding street levels. The basement would be set back approx.5.8m from the closest neighbour at 102 St Pancras Way.
- 6.102 Accordingly a BIA was provided and appropriately follows the sequential approach outlined in CPG4 ('screening', 'scoping' and 'site investigation') of the three test subjects below.

Subterranean (ground water) flow

- 6.103 All 7 screening questions resulted in 'no'; therefore there was no requirement to proceed to scoping stage for groundwater flow. In summary the site is not located above an aquifer, not close to any water courses or catchment areas. Three boreholes at 20m and 2 x 30m were taken across the site during January and February 2013, which demonstrated that the 4m deep excavation would not extend to the water table. Moreover, the development would not increase the proportion of impermeable surfaces, there should be a reduction in recharge given that 500sqm of living roofs and rainwater harvesting is proposed. The existing groundwater regime should therefore not be harmfully impacted upon.

Slope stability

- 6.104 The site is relatively flat; therefore most of the screening questions also required no scoping stage. The questions that do are (Q5) London Clay would be the shallowest strata, (Q6) a tree would be removed and the (Q11) excavation would be within 5m of a highway. As such scoping would be required on these points and a technical ground movement analysis has been undertaken in the BIA. Short term heave is predicted a 10mm around the perimeter and this reduces to 6mm in the long term. The only neighbouring building that would be within the influence of the excavation is 102 St Pancras Way, however a distance of approx.5.8m would be maintained to limit impact on structural stability. At this neighbour the heave would be counteracted by settlement due to proposed sheet pile wall deflection so that the maximum vertical movement at 102 St Pancras Way is 1mm upwards. This would be negligible (or category 0 on the Burland Scale). The nearby highways would be protected by props during the temporary works, and the basement retaining wall and infill in the long term.

Surface flow and flooding

- 6.105 Firstly, the streets surrounding the site are not identified in CPG4 as streets at risk from surface water flooding (no floods recorded in 1975 or 2002), nor is the site within a flood plain. It is in Flood Zone 1 of the Environment Agency's flood zone map, which is classified as having the lowest flood risk. SUDS and rainwater harvesting will be conditioned to ensure that there would be no significant impact on drainage or run-off at ground level as a result of the basement excavation. Thames

Water, or the Environment Agency, has raised no objections to the basement in their consultation responses.

Independent verification of the BIA

- 6.106 At officer request, the applicant funded a full independent verification of the submitted BIA. This was undertaken by the Geotechnical Consulting Group who is experienced in the formation of BIAs that are commonly submitted to the Council as part of planning applications. The independent engineer considers the applicant's BIA appropriate, but the ground movement assessment should be revisited once more details of the piling design and methodology have been established. The revision should include assessment of the effects of pile installation. These further calculations would be secured as part of a piling detail condition, which has been requested by Thames Water in any event.
- 6.107 In summary, the excavation proposed will not harm the built and natural environment or local amenity, and complies with policy DP27. The independent verification provides further comfort and the standard basement condition would be secured to ensure the works are carried out to best practice standards and monitored by qualified engineers.

Transport, construction management and servicing

Context

- 6.108 The site has a maximum public transport accessibility (PTAL) score of 6b 'excellent' which is the highest level. The nearest transport interchange is Camden Road station (Overground) located 150m to the southwest of the site, whilst Camden Town station (Underground) is located 540m to the southwest. The nearest bus stops are located on Camden Road and St Pancras Way. The site is located within the Somers Town Controlled Parking Zone (CPZ) (CA-G), which operates between 8.30am and 6.30pm Monday to Friday. The ratio of parking permits to parking spaces is 1.04, which suggests that parking stress is a significant issue in this CPZ. Dedicated cycling facilities exist on St Pancras Way directly adjacent to the site, including an advisory cycle lane and an advanced stop line bike box at the signalised junction with Camden Road.

Trip generation

- 6.109 The applicant appointed consultants SKM Colin Buchanan (SKM-BC) to undertake a transport assessment (TA). The TA includes a section titled 'Trip Generation' which summarises an assessment of the existing office use and proposed residential use for the site. Trip rates have been derived from the TRAVL database, using similar sites in central and inner London for comparison purposes. The methodology for the trip generation assessment is acceptable.
- 6.110 The trip generation assessment suggests that the proposed scheme would lead to a reduction in trips across all modes during morning and evening peak periods (Monday to Friday); a reduction of 132 trips in the morning peak and 150 trips in the evening peak. The proposed scheme would also result in a change in the profile of trips to and from the site. During the morning peak period there would be 61 additional outbound trips, whilst there would be a decrease of 194 inbound trips.

The opposite would be true during the evening peak period, where there would be 19 additional inbound trips and a decrease of 168 outbound trips. The results of the trip generation assessment for the morning and evening peak periods are summarised in the table below.

Time Period	AM Peak			PM Peak		
	In	Out	Total	In	Out	Total
Existing	222	20	242	25	193	218
Proposed	28	81	110	44	25	68
Net Impact	-194	61	-132	19	-168	-150

6.111 It is noted that the proposed development would actually increase the number of trips during standard working hours due to the fact that the site is currently unoccupied (110 AM and 68 PM). However, it must be acknowledged that the permitted office use could be reoccupied, albeit with some refurbishments likely to be necessary.

6.112 It is also worth noting that the proposed scheme would lead to an increase in trips across all modes at weekends and outside of standard office working hours during the week (e.g. 0800 to 1830 hours Monday to Friday). The residential land use is anticipated to generate in the order of 674 two way trips during a weekend day.

6.113 The trip generation exercise uses 2011 census data for the Cantelows Ward (Method of journey to work) as a means of predicting the modal split of the proposed development. Tables 5.5 and 5.6 of the TA discuss modal share predictions and these can be summarised as follows:

- 57.6%% public transport
- 16.7% walking
- 12% cycling
- 13.7% other (e.g. car, van, motorcycle, scooter, moped, car club)

6.114 These modal share predictions are very encouraging, especially those for walking and cycling.

Travel Planning

6.115 The applicant has provided a draft Travel Plan (TP) in support of the planning application. This has been reviewed by the Council's Travel Planner against TfL's guidance, and is found to be a good example of a draft TP. To satisfy policy DP16 a strategic level Residential Travel Plan is also required and this would be appropriately secured by s106, alongside a financial contribution of £5,729 to cover the costs of monitoring and reviewing the TP over a 5 year period.

6.116 TfL encourages developers to use the TRAVL database for trip generation predictions, as such the applicant is required to undertake a TRAVL after study and provide TfL and Camden with the results on completion of the development. TfL would then be able to update their TRAVL database with the trip generation results. These post development surveys and results are to be secured by s106 planning as part of the TP review and monitoring process. The Council's Transport/Travel Planners and TfL are satisfied.

Car parking

- 6.117 Development Policy DP18 expects developments to be car free in areas within Controlled Parking Zones that are highly accessible by public transport. As such the development would be secured as a car free (except for disabled parking) in the s106. Residents would not be eligible to apply for on-street parking permits from the Council and this is supported.
- 6.118 The proposal would also include the provision of 2 fully accessible disabled parking spaces within the site boundary, accessed from Rochester Place. New vehicular crossovers would be required to allow access from the public highway, which would form part of the associated highway works to be designed and constructed by Camden. The Transport Assessment (TA) includes turning movement diagrams to demonstrate that a standard sized car would access each proposed parking space without the need to remove any existing on-street parking bays. Minor revisions to the existing road markings, as part of any future public highway improvement proposals in the vicinity of the site, would ensure that cars would be able to reverse into the spaces as recommended in the Highway Code. This element of the proposal complies with DP19 and is therefore acceptable in transport terms.
- 6.119 Camden's parking standards suggest that an on-site car parking space should be provided for each fully accessible residential unit. In total 17 units are to be provided, however only 2 spaces are proposed. This reduction is primarily justified by the lack of space within the site boundary given the need to secure optimum residential density and large communal courtyards. The site also has the highest available PTAL rating of 6b, which helps further justify a lesser car parking provision as disabled residents could access public transport and are therefore not completely reliant on private motor cars. Similarly, the site's location adjacent to Camden Town would allow good access to important amenities without the need for car usage. Moreover, a blue badge holder can park in resident parking bays on the public highway and capacity does exist to accommodate any additional blue badge holders that would reside in the development.
- 6.120 Considering the high accessibility of the site and the desire for onsite amenity space and an optimum development, on balance the provision of 2 spaces are supported by Transport and Access Officers, subject to them being secured by s106 for the affordable rent wheelchair accessible units only.
- 6.121 Finally, the provision of an electric vehicle charging point for each of the fully 2 bays is to be secured by condition, as requested by TfL.

Car Clubs

- 6.122 There is an existing car club bay is located directly adjacent to the site on Rochester Place. Due to the site being highly accessible by public transport with an existing bay nearby, there is no requirement for additional bays. Residents would be eligible to join the local car club membership scheme.

Cycle parking

- 6.123 The key aims of policies CS11, DP17, and CPG7 (Transport) is to promote cycling in the borough. Camden's Transport Strategy has set a target of 20.5% for cycling as a proportion of road traffic flows in the borough by 2020.

6.124 The London Plan cycle parking standards requires a minimum provision of 1 cycle parking space for 1 or 2 bedroom dwellings and 2 cycle parking spaces for dwellings with 3 or more bedrooms. The London Plan revised early minor alterations (October 2013) also require 1 cycle parking space per 40 residential units to be provided for visitors. The proposal would therefore require a minimum provision of 188 cycle parking spaces; 183 spaces for residents and 5 spaces for visitors.

6.125 A total of 296 covered, secure and fully enclosed cycle parking spaces are proposed. The cycle stores would be arranged around the core of each block so that the provision reflects the accommodation schedule for each block. Access to each cycle store would be achieved via lifts, positively ensuring residents do not have to utilise a stairwell or cycle ramp. The cycle parking is therefore accessible, secure and sheltered and far exceeds the requirements of the London Plan standards. The proposed level of provision and access arrangements are supported. A condition shall be included to secure the minimum 188 cycle spaces (reasonable should the 296 proposal not be reached), with further details of store layout also required.

Pedestrian Access to the site from the public highway

6.126 Pedestrians would access the site from each of the site frontages (St Pancras Way, Camden Way & Rochester Place), with access into the relevant cores, concierge and duplex units. The building footprint would be set back from the St Pancras Way and Rochester Place frontages to facilitate an increased footway width in these locations. Indeed the proposed layout confirms a footway width that ranges between 2.1m and 3.9m along the St Pancras Way frontage (a minimum increase of 0.3m over existing), and a footway width that ranges between 1.1m and 1.8m along the Rochester Place frontage (a minimum increase of 0.25m above the existing).

6.127 Local concern was raised about how the additional movements along Rochester Place would change its character. However the majority of block A, B, C and F movements would likely be from St Pancras Way given the location of the town centre and transport links, with only block D resulting in noticeable movements, and block E is very close to the corner with Camden Road. Moreover, this is an edge of town centre site with high accessibility so it's reasonable to have moderate to higher numbers of pedestrian movements along streets.

6.128 The proposed footway width adjacent to the Rochester Place frontage would be able to accommodate a wheelchair user in accordance with the Manual for Streets that seeks a minimum requirement of 0.9m pavement width for this purpose. Potential conflicts can be accommodated with informal passing places that are created by the proposed building line. The proposed footway widths adjacent to the site are acceptable to Transport and Access Officers.

Deliveries and Servicing

6.129 During the pre-planning application stage the local community and Members (at the Development Management Forum and Developer's Briefing respectfully) raised strong concerns about the impact the development would have on the amenity of

Rochester Place. The concerns related to the potential for significant additional vehicle movements and stopping for servicing and refuse collection activity, and how this would disrupt traffic movements and pedestrian safety on the narrow pavement abutting the site. Given the strength and validity of these concerns the applicant has worked closely with the Council's Transport Planners, Access Officer and Street and Environment Team in order to ensure that the development is designed as far as practically possible to limit harmful impact on Rochester Place. The solutions are discussed below.

- 6.130 Firstly, it must be noted that there can be no servicing or refuse collection from Camden Road as it is located on TfL's Transport for London Road Network and includes a bus stop that must not be obstructed. Therefore the site would have to be serviced by St Pancras Way and Rochester Place.
- 6.131 In light of the Rochester Place concerns, the applicant has committed to encourage deliveries that require long set down period to occur on St Pancras Way, such as furniture delivery or home removal activity. Reliance on St Pancras Way is facilitated by the fact that each of the cores that front Rochester Place (Cores A, D and E) are all accessible from St Pancras Way, with Core A accessible via the Core B pedestrian entrance and Core's D and E being accessible via the private concierge and internal courtyard.
- 6.132 Use of St Pancras Way will be marketed within the travel information leaflets that will be submitted to each household at first occupation, and secured as a requirement of the Delivery and Servicing Plan that will be part of the S106. This will be regularly monitored and reinforced by the appointed Travel Plan Coordinator during any subsequent steering group meeting. The Highway Officers will investigate the potential for the introduction of loading controls along the St Pancras Way frontage so that on-street loading cannot occur during peak hours, thereby not impacting upon the existing advisory cycle lane.
- 6.133 Short set down period delivery, including postal and courier / internet shopping, would be readily accommodated within existing areas of single yellow lines along Rochester Place, for which there are no existing loading controls, with sufficient carriageway widths to allow cars and vans to pass any parked delivery van.
- 6.134 Notwithstanding the servicing arrangements outlined above, the applicant's Transport Assessment (TA) has confirmed that there would not be significant numbers of additional vehicle movements generated. Servicing trip rates have been derived from the TRAVL database. This compares the proposed development against similar developments in London. The trip generation exercise suggests that the development would generate 5 motor vehicle related trips per day. This would include postal deliveries, and waste and recycling collections. The TA suggests that 2 or 3 of these trips would be associated with the Rochester Place frontage. This level of servicing trip generation would be unlikely to have any noticeable impact on the operation of the surrounding highway network.

Internet shopping delivery

- 6.135 The applicant has positively acknowledged the recent trend for increased internet shopping and home deliveries, particularly in car-free developments like this. As

such surveys of 3 similar and recently occupied car free developments in London have been undertaken. The results of the surveys suggest that between 2 and 9 trips could be generated. The worst case scenario of 9 servicing trips per day is therefore highly unlikely to have any impact on the operation of the public highway network, with the majority of these trips to affect St Pancras Way only, not Rochester Place. Finally, the site is located on the edge of Camden Town centre and only a 400m walk to Sainsbury's Supermarket that residents would pass on route to the Underground Station. Therefore residents are not wholly reliant on internet shopping in this location with links excellent level of public transport and amenities.

Refuse collection

- 6.136 It is important to note that the applicant discussed the proposed refuse collection arrangements with the Council's Principal Environment Services Officer and the refuse and recycling collections contractor Veolia. These discussions were considered in the formation of the applicant's Waste and Recycling Strategy that supports the application, which has been found acceptable. Refuse vehicles already use Rochester Place and Rochester Mews. The applicant has agreed with TfL that refuse vehicles can stop on St Pancras Way to serve all 84 affordable units in blocks A, B and C and 32 private units in block F. This leaves only blocks D and E's (50 units) refuse to be collected from Rochester Place. Rochester Place forms part of an existing refuse collection route and the additional refuse from 50 flats would not result in an intensification of refuse vehicle movements, just longer set down periods that should be materially harmful. The securing of Waste and Recycling Strategy in the s106 would also ensure that collection is carefully managed to minimise disruption on collection days.
- 6.137 To further satisfy local concern on Rochester Place disruption from refuse vehicle movement, the applicant undertook a traffic survey on Rochester Place. This recorded 20 eastbound vehicles between 7am – midday, the times when collection would occur. This is so lightly trafficked that the addition of 2 additional bin stores serving 50 flats would not create additional pressure to the existing arrangement. No additional refuse vehicles would be necessary; the current the 2.45m wide refuse collection vehicle would continue to travel down Rochester Place.
- 6.138 The Council's Transport and Street Environment Officers, TfL and the waste contractor Veolia are all satisfied with the delivery, servicing and refuse collection arrangement for the site and do not consider that the amenity of Rochester Place would be harmed by the development. A Delivery and Servicing Management Plan (SMP) and Waste and Recycling Strategy shall be secured in the s106 to sensitively manage the arrangements described above during the lifetime of the development.

Managing Construction Impacts on the Public Highway Network

- 6.139 A draft construction management plan (CMP) has been submitted, which provides appropriate information describing construction impacts and potential mitigation measures. The information also assesses how the proposed works would be programmed and managed during the construction period. The site would be registered with the 'Considerate Constructors Scheme' and works would be undertaken in accordance with the 'Guide to Contractors Working in Camden'. A

Construction Working Group would be set up to keep the local community fully informed during the demolition and construction period. The draft CMP generally adheres to the guidance provided in our Camden Planning Guidance document CPG6 (Amenity).

- 6.140 The proposed construction period is to be 24 months commencing in summer 2014. The draft CMP appropriately outlines the likely key site activities on a month by month basis. A maximum of 20 daily construction vehicle trips are anticipated. A 'Just in Time' delivery system would be employed, and a booking system would be set up so that construction vehicle trips would be outside peak times and spread across the day in order to minimise impacts on traffic congestion and road safety. This is welcomed by TfL and the Council's Transport Officer.
- 6.141 As St Pancras Way is a busy cyclist and pedestrian route more detail would be required as part of the full CMP to outline measures to ensure cyclist and pedestrian safety. The footway and the cycle lane directly adjacent to the St Pancras Way frontage should remain open at all times during the construction process.
- 6.142 The Transport Officers and TfL foresee no road safety problems so long as best practice arrangements are followed, including all vehicle movements into and out of the site to be carefully supervised by a gateman and numerous banksmen and most vehicles to enter and exit the site in a forward gear. The full CMP shall outline how this would be achieved, and identify any temporary highway works that may be required in order to facilitate turning movements for larger construction vehicles.
- 6.143 The draft CMP suggests that most deliveries and servicing during construction would take place from St Pancras Way, which is acceptable. This arrangement shall minimise impact upon Camden Road which is a busy TfL route and Rochester Place which is a quiet 'mews' type of street. In certain circumstance some delivery would be necessary on Rochester Place, however these would very limited and carefully controlled and always agreed with the local community through the Construction Working Group in advance.
- 6.144 The draft CMP suggests that parking would not be provided on site for construction workers, which is welcomed as travel by sustainable modes of transport is encouraged. The final CMP would include more detail to describe how construction workers should travel.
- 6.145 Finally, a high level of community liaison for a development of this size is expected should planning permission be granted. The final CMP would provide a section discussing public consultation on the draft CMP, including any feedback received and measures taken to overcome issues raised. The applicant would also be required to set up a Construction Working Group (CWG) which would include representatives from the local community (residents, businesses and ward Councillors). A CWG meeting should be held prior to the final CMP being submitted to the Council and TfL for approval. Any problems raised and mitigation measures identified should be discussed in the final CMP.

Public Highway and Public Realm Improvements in the vicinity of the Site

- 6.146 The Council would seek to secure a financial contribution to cover the costs of undertaking highway and public realm improvement works adjacent to the site. This would mitigate any damage to the public highway as a result of the proposed demolition and construction works.
- 6.147 The improvement works would include the removal of redundant vehicular crossovers on St Pancras Way and the construction of 2 new vehicular crossovers on Rochester Place. The works may require some local re-cobbling of the carriageway on Rochester Place. The works would also include repaving of the footways adjacent to the Camden Road, St Pancras Way, and Rochester Place frontages. The footways on St Pancras Way, and Rochester Place would also be widened as already described.
- 6.148 Street furniture that would obstruct access to the site would need to be relocated (phone boxes, telecommunications cabinets, street name plates, traffic sign posts, lamp columns, bollards etc). We would also wish to remove any redundant street furniture items as a means of reducing unnecessary street clutter.
- 6.149 The Highways Implementation Team have cost estimated the works at £179,000, which would be secured by s106.

Public Highway and Public Realm Improvement Works in the wider area

- 6.150 Given the scale of the proposed development, a financial contribution towards Pedestrian, Cycling and Environmental Improvements in the local area is necessary as outlined in Camden Planning Guidance 8 (Planning Obligations). Although a car free development is proposed, a significant level of short distance pedestrian trips between the site and nearby transport interchanges and local amenities are anticipated. These additional trips would have an impact on the surrounding footways and public transport facilities. A financial contribution to mitigate such impacts whilst also encouraging sustainable transport choices.
- 6.151 The Council has developed a Place Plan for Camden Town, which describes existing transport problems and include action plans describing mitigation measures. Given the site location, a financial contribution towards the Camden Town based schemes would be justified to allow the Council to mitigate the impacts of the proposed development.
- 6.152 The proposal would generate additional cycling trips in the local area; consequently some improvements to the existing cycling facilities on St Pancras Way and Royal College Street are likely necessary. Such a contribution would also address a shortage of cycle parking facilities in Camden Town and Kentish Town.
- 6.153 A Pedestrian Environment Review System (PERS) audit was undertaken in support of the planning application. The audit identified a small number of problems on pedestrian routes in the local area, and recommended various strategies to improve conditions for pedestrians using these routes. Given the significant level of pedestrian trips associated with the development, the Council may seek to implement the mitigation measures recommended by the PERS audit.

- 6.154 TfL has requested a financial contribution to upgrade the bus shelter at bus stop 331 (F), located approximately 100m to the south of the site on Camden Road. Furthermore, given the significant level of pedestrian trips associated with the development, additional Legible London signs in the vicinity of the site are likely necessary.
- 6.155 Taking all of the above points into consideration, a financial contribution of £165,000 towards pedestrian, cycling and environmental improvements in the vicinity of the site is justified. This would be secured by s106 planning obligation.

Waste and recycling storage

- 6.156 As discussed above, the refuse collection arrangements were discussed and agreed with the Council's Principal Environment Services Officer and the contractor Veolia, prior to submission. In addition to collection arrangements, the size and location of the individual bin storage and bulky waste storage areas serving each of the 6 blocks were also agreed and included in the Waste and Recycling Strategy. The requirements are outlined below.
- 6.157 The operational development is anticipated to produce approximately 31,500L per week (4,501L per day). Of this total, 15,750L will comprise mixed dry recyclables, 3,937L will be formed of organic food waste with the remaining 11,813L expected to be residual waste. Both mixed dry recyclables and residual waste will be stored in 1,100L Euro bins; organic food waste will be stored in 500L Euro bins. All waste types would be provided with sufficient capacity for eight days' worth of waste generation. Mixed dry recyclables and residual waste will be collected on a weekly basis; food waste will undergo twice weekly collection. All waste will be stored at the ground floor level with the internal management team to make ready on collection days. A total 33 x 1,100L Euro bins and 12 x 500L Euro bins are proposed across the 6 bin stores, which complies with the capacity requirements outlined in CPG1 section 10. A total of 101.1sqm of bulk waste storage is also proposed in accordance with CPG1 guidance. The strategy is supported.

Sustainability and climate change

- 6.158 Pursuant to Core Strategy policy CS13 and Development Policies DP22 and DP23 all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Climate change mitigation

- 6.159 This requires developments to make the fullest contribution to tackling climate change in the following hierarchy: firstly by minimising carbon dioxide emissions, adopting sustainable design and construction measures (be lean), secondly prioritising decentralised energy (be clean) and thirdly incorporating renewable technologies (be green). This hierarchy is outlined in London Plan policy 5.2, which also requires a 40% carbon saving beyond Part L of the 2010 Building Regulations.
- 6.160 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions. An appropriate range of passive design features, and

demand reduction measures, have been included to reduce the carbon dioxide emissions of the development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery, and improved thermal bridging. The demand for cooling will be minimised through solar control glazing and internal blinds for shading.

- 6.161 The applicant has demonstrated that there are no existing, or planned, district heating networks within the vicinity of the proposed development. However, the applicant has committed to ensuring that the development is designed so as to allow for future connection to a district network, should one become available.
- 6.162 The applicant is proposing to install a site-wide heat-network, supplied from a single energy centre. Following officer request, the applicant has appropriately confirmed that the network will serve all of the residential units, and has provided a schematic demonstrating sufficient space has been allocated within the lower ground floor energy centre for the proposed plant.
- 6.163 The applicant is proposing to install a 70 kWe gas fired combined heat and power unit, sized to provide the domestic hot water load, as well as a proportion of the space heating. The applicant's own management company (BRAM) would be responsible for the ongoing maintenance of the CHP. The electricity generated would not be sold to the national grid, rather it will contribute to the entire development this reducing management and energy costs to all residents. This is welcomed and shall be secured in the s106.
- 6.164 The applicant has investigated the feasibility of a range of renewable energy technologies, and is proposing to install 130sqm of photovoltaic panels on the roof of the development. A roof plan showing the proposed location of the panel installation has been provided.
- 6.165 An overall reduction of 83 tonnes of carbon dioxide regulated emissions compared to a 2010 Building Regulations compliant development is reported to be achieved through all the measures outlined above, equivalent to an overall saving of 41%. This percentage saving exceeds the London Plan' 40% target, and is supported.

Climate change adaptation

- 6.166 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. Measures proposed include rainwater harvesting, 500sqm biodiverse roofs, use of low energy lighting and energy efficient appliances, metering, high levels of insulation, and low water use sanitary-ware and fittings.
- 6.167 A Code for Sustainable Homes (CfSH) pre-assessment rating of 'level 4' would be achieved. This rating meets the policy DP22 requirement and shall be secured within the s106 legal agreement. Moreover the CfSH would achieve 67% of available credits for water and 46% for materials, which both exceed to 40% minimum outlined in CPG3 for these categories. The minimum 60% credits for energy are not met, with 49% being achieved. On balance, this 11% shortfall can be accepted given the comfortable exceeding on other categories.

Trees and habitat

- 6.168 Policy CS15 expects new developments to create new and enhanced habitat where possible, and to protect existing trees whilst promoting the provision of new trees and vegetation including additional street trees. The application is accompanied by an Arboricultural Report that was carried out in accordance with the guidance and recommendations of British Standards 5837: (2012) 'Trees in relation to construction'.
- 6.169 A mature London Plane (T1) located on the St Pancras Way frontage is proposed for removal. This tree has a white rot fungus (weakens the base and roots) and has been heavily reduced in the past. Consequently its life expectancy is lessened and its removal has been justified to the Council's Tree Officer. Large healthy Planes on opposite side of road will go some way to mitigate loss of visual amenity and canopy cover. Moreover, a contribution of £15,000 is secured to facilitate the investigation of additional tree planting on St Pancras Way, and tall trees would be planted in each courtyard. The standard landscaping condition would be secured to ensure appropriate species are planted and maintained.
- 6.170 Two London Planes (T9 and T10) and four Limes (T11, 12, 13 and 14), which front Camden Road, are proposed for pruning. The Council's Tree Officer has confirmed that these species are tolerant of pruning, and appropriate conditions would be attached to protect their root systems during the works. This is acceptable subject separate approval from TfL who manage these street trees.
- 6.171 In terms of ecology, there are no statutory or non-statutory sites of nature conservation importance on or close to the site, the nearest is the Camley Street Nature Reserve about 1.1km to the south east. An extended Phase 1 Habitat Survey was conducted during August 2013 and accompanies the application. This confirms that there was a low ecological value on the site. The surrounding trees support common nesting bird species during the spring and summer; as such the Council's Nature Conservation Officer has requested a condition to prevent any demolition works during the breeding season. The features of the existing buildings on the site were assessed to have a low potential to support bats and none of the trees contained cavities to house bat roosts.
- 6.172 The ecology of the site should be enhanced with the provision of tree planting and shrubbery in the courtyards and roof gardens, 500sqm of biodiverse roofs, and provision of bird, bat and invertebrate boxes. All these features are supported by the Nature Conservation Officer and appropriate conditions would be included to secure their provision.

Noise, air quality and contaminated land

Noise

- 6.173 Policy DP28 relates to the protection of existing and future amenity with regard to noise disturbance, and acknowledges that background noise levels in Camden are high in many areas, especially in inner London areas next to busy TfL roads. Accordingly the application includes a Noise Assessment. For information, National

guidance in PPG 24, which included Noise Exposure Categories (NEC), has now been superseded by the NPPF. The NPPF does not refer to NEC's but for the purpose of assessment it is still appropriate to refer to the NEC levels that apply to the site.

- 6.174 Noise surveys were undertaken on Wednesday 7 August and Thursday 8 August 2013 (24 hours) and again on Thursday 28 August through to Tuesday 3 September 2013 (5 days continuous) from Camden Road and St Pancras Way proposed façade locations. The surveys represent weekend and weekday periods. The results on the noisiest Camden Road elevation confirm that dominant noise sources are attributable to road and show that the existing levels are within NEC C. It is accepted that residential uses can be built in NEC C areas, and during the course of the application the applicant has provided a detailed facade mitigation strategy in response to the Council's Noise Officer's concerns. Appropriate noise conditions would also be attached to secure noise insulation and attenuation measures, including vibration attenuation measures from traffic and fixed plant. Moreover, residential buildings along this road are already commonplace, with many older buildings lacking the modern day attenuation measures that will be incorporated in the proposed buildings.

Air Quality

- 6.175 Protecting air quality in Camden is a key consideration especially along heavily trafficked central London roads, such as Camden and St Pancras Roads. In accordance with policy DP32 the Environmental Statement includes Air Quality Assessment. In terms of the development's impact on existing air quality conditions, there would be little traffic generation given that the development would be car free. The Air Quality Officer was initially concerned by the levels of PM₁₀ pollution that would result from demolition and construction works. However continuous air quality monitoring is always secured by way of a Construction Management Plan that this is secured in the s106.

Contaminated land

- 6.176 The Council's Contamination Officer identifies the site as medium risk to earth contamination and therefore requires the Council's standard condition to secure a written programme of ground investigation for the presence of soil and groundwater contamination to be submitted before works commence on site.

Planning obligations and community benefits

Community facilities

- 6.177 Core Strategy policy CS10 sets out Camden's overarching approach to protecting and providing the community facilities that meet the needs of Camden's growing population, with supporting Development Policy DP15 stating that the council will expect developments that result in any additional need for community or leisure facilities to contribute towards supporting existing facilities or providing for new facilities.
- 6.178 The applicant has offered a financial contribution towards community facilities based upon the CPG8 formula that seeks £980 per bedroom, which is £294,980 (301 bedrooms x £980). However for large major schemes the contribution is to be

negotiated on a case by case basis and therefore this contribution is expected to be increased. A recent example secured was £500,000 for the nearby Hawley Wharf development, which included 170 flats. However it also included a significant area of commercial space that may also put pressure on local community facilities. The final contribution is yet to be determined.

Education

- 6.179 Core Strategy policy CS10 sets out Camden's overarching approach to providing the educational facilities that meet the needs of Camden's growing population, with supporting Development Policy DP15 stating that the council will expect developments that result in any additional need for education facilities to contribute towards supporting existing facilities or providing for new facilities.
- 6.180 The development on its own (anticipating 62 children, including 27 under-five year olds) is not large enough to necessitate the building of a new school. Moreover, the Council's 2013 report on 'Annual Primary Places Planning Process' confirms that there is no shortage of school place in this part of the borough. Furthermore, the one-form entry Hawley Infant School is due for completion in 2016 (to accommodate 210 pupils and a 26 pupil nursery facility). As such a full financial contribution can be justified for this development. In line with the CPG8 formula only the market housing units are required to make a contribution, this equates to £170,712 and would be secured in the s106 agreement.

Health facilities

- 6.181 Between 2002 and 2008 part of the site was used as a temporary doctor's surgery whilst the Kentish Town Health Centre at 2 Bartholomew Road (or James Wigg Practice) was refurbished. Public consultation feedback suggested that the site should include a surgery; however this would only be justified if there was a need identified. To assess the need, the applicant has therefore provided a GP and Dental Surgery Capacity Analysis in support of the application.
- 6.182 Three GP surgeries are located within 800m of the site (James Wigg, Plender Street and Amphill practices) with a further 2 just over 1km away (Prince of Wales Group and The Caversham Group practices). All have confirmed that they are accepting new patients. The 3 closes practices provide a total of 30 GPs for which the GP to patient ratio is 1 to 924. This falls substantially below the averages specified by the Camden Clinical Commission Group and the NHS, whom cite 1 GP per 1,477 and 1,700 patients respectfully. The proposed population increase of 300 residents can be comfortably met by the existing local supply of GP surgeries. As such a new surgery on the site is not justified. Moreover, the provision of new GP practices is now the responsibility of NHS England, and their criteria would not support any additional provision in an area which is already so well supplied.
- 6.183 Similarly, there are 6 NHS dental practices within an 800m radius of the site, and all accepting new patients.

Local employment and apprenticeships

- 6.184 Policies CS8, DP13 and CPG8 seek to improve local employment opportunities through developments. All major developments are required to provide employment opportunities to Camden residents including apprenticeships on site throughout

their constriction period. In summary: The Council's Economic Development team have secured the following provisions.

- Sign up to the Camden Local Procurement Code, requiring a minimum delivery of 20% local procurement.
- Advertise all construction vacancies and work placement opportunities exclusively with the Kings Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- A total of 10 Kings Cross Construction Skills Centre construction apprentices are secured in the s106. Each apprentice would be provided with 52 weeks of employment, paid at the National Minimum Wage or above and provided with training and support while on site.
- In addition a financial contribution of £1,500 per apprentice would be secured (total £15,000) to be used by the Council as a contribution to the cost of the apprentice recruitment and support service provided by the Construction Skills Centre.
- 13 work placement opportunities (recruited through the Council's Kings Cross Construction Skills Centre) of not less than 2 weeks each, to be undertaken over the course of the development.
- Deliver at least 1 supplier capacity building workshop/Meet the Buyer event to support Camden SMEs to tender for construction contracts in relation to the development.
- Provide an Employment and Skills Plan to be secured in the s106 whereby the developer would liaise with local providers to fill vacancies.

6.185 With regards to seeking a financial contribution for loss of employment opportunities on the site, CPG8 (paragraph 8.10) indicates that a contribution can only be sought where: the net loss is 500sqm or more; occupied by a commercial tenant or has only recently been vacated; and the building has design features which make it unsuitable for continued employment use. Although greater than 500sqm, the building was vacated in 2010 (not recently) and was occupied by a public body (Camden Council) not a commercial tenant. Moreover this report (under paragraphs 6.5 – 6.12) has demonstrated the unsuitability for continued business use without the need for significant re-investment. As such the scheme is not liable for such a contribution.

S106 heads of terms

6.186 This section lists the s106 heads of terms that would have been sought in the event of a recommendation to approve. As refusal is recommended, the lack of securing the following s106 obligations would also form refusal reasons.

- Affordable Housing: 50% onsite with an acceptable housing mix.
- Car free except for the provision of 2 parking bays for disabled drivers
- Wheelchair accessible / adaptable flats x 17
- Demolition and Construction Management Plan
- Delivery and Servicing Management Plan
- Waste and Recycling Strategy
- Residential Travel Plan
- Travel Plan monitoring contribution: **£5,729**
- Highways contribution: **£179,000**

- Pedestrian, cycling and environmental improvements contribution: **£165,000**
- Code for Sustainable Homes 'level 4' rating for new build
- CHP and renewable energy (PV) generation on site
- Future proofing for connection to decentralised energy network
- Public open space contribution: **£210,310**
- Education contribution: **£170,712**
- Community facility contribution: **Figure not agreed**
- Public Art contribution: **Figure not agreed**
- New street tree planting contribution: **£15,000**
- Signing up to Council's Local Procurement Code
- 10 Kings Cross Construction Skills Centre construction apprentices and support fee of £1,500 per apprentice
- 13 work placement opportunities from Kings Cross Construction Skills Centre of not less than 2 weeks each, to be undertaken over the course of the development
- Employment and Skills Plan

7. CONCLUSION

- 7.1 The applicant has demonstrated that existing buildings on the site that have lain vacant since 2010, in their current form and physical state of repair, are not suitable for a business use to continue, whether that is office or light industrial. Although it is acknowledged that the site owner could undertake refurbishment works to make the building attractive for business tenants, this undertaking would necessitate a significant financial investment and therefore risk. This could inappropriately result in an important piece of unused and underused land to continue lay vacant, whereas it should otherwise be redeveloped for an alternative land use. In this case housing and affordable housing, which is the council's top land use priority, is promoted. On balance the loss of employment can be justified by the site's regeneration potential and housing proposed.
- 7.2 The proposal has been developed so that the character and settings of adjacent heritage assets would be preserved, and the building is considered to make an appropriate response to the site and its surroundings in terms of its layout, varied heights, sculptured massing and architectural detail. The scale of building is also appropriate for this prominent site that fronts the juncture of two busy roads. The building is considered to be of high architectural quality and design detail and would provide an enhancement the surrounding townscape.
- 7.3 The varied massing and heights across the development would also ensure that the amenities of surrounding residential neighbours, including those at Rochester Place and Rochester Mews, would not be unduly harmed. The proposed residential units would provide a good quality of accommodation, including flats and duplexes with their own front doors to the street, with all meeting minimum space standards and having access to either private balconies or communal amenity at courtyard or roof level. The two large courtyard spaces are a considered response to an edge of town centre site fronted by busy roads, whereby the spaces would allow for high numbers of dual aspect units and provide a good level of visual amenity and a quiet calmness for residents.

- 7.4 Moreover, the character and amenity of Rochester Place is to be preserved as practically possible by providing a lower scale of building and locating only 2 of the 6 access cores located on this frontage. The majority of servicing and resident and visitor movements, to and from the site, would be from St Pancras Way, and the existing refuse collection route along Rochester Place would only be required to cater for 50 additional units.
- 7.5 Notwithstanding the positive aspects of the development summarised above, the significant lack of large units (3 and 4-beds) across the 166 unit scheme would fail to provide a mixed and balanced community. Only 17 large units, equating to 10%, are proposed. Of greatest concern is the significant lack of large units in the affordable rent tenure (at 24%, less than half of the 50% guidance), of which there is a pressing need in the Camden and London as a whole. Consequently the proposal is recommended for refusal on the grounds of an unacceptable housing mix. Furthermore, no viability appraisal has been submitted and refusal is also recommended in the absence of this viability information, and opportunity for its independent verification. The GLA supports the Council's position in regard to the housing mix and lack of viability information.
- 7.6 The positive aspects of the scheme would not be outweighed by a significantly inadequate housing mix that would fail to properly meet the housing needs of Camden's residents.

8. **RECOMMENDATION**

- 8.1 Planning Permission is recommended for refusal for reasons outlined in the report, and to refer the committee resolution back to the Mayor of London for his Stage 2 Direction.

9. **LEGAL COMMENTS**

- 9.1 Members are referred to the note from the Legal Division at the start of the Agenda.