

CAMLEY STREET NEIGHBOURHOOD FORUM



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Response to planning applications for 101 and 102 Camley Street, London NW1:

The Camley Street Neighbourhood Forum is responding to the invitation to comment on planning applications made by:

Gateway Evolution Ltd 101 Camley Street London, NW1 OPF 2014/4385/P
Regent Renewal Ltd 102 Camley Street, London NW1 OPF 2014/4381/P

These are two separate applications. Many of our observations relate to both applications as do a substantial number of the developers' assumptions, evidence and documentation. We are therefore responding to both applications in this document, and where there are comments which pertain to one or other we have noted these in the text.

We would be happy to respond in more detail about any of these matters should the opportunity arise or the Council think this necessary.

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1. Camley Street Neighbourhood Forum

Camley Street Neighbourhood Forum was approved by LB Camden on March 3rd 2014 and is preparing a neighbourhood plan for its approved area, under the terms of the Localism Act 2011.

Camley Street Neighbourhood Forum attended the two planning consultation meetings organised by Your Shout on behalf of the developers, and submitted a response to the first of the, on April 7th. This is attached at the end of this document for reference.

As Your Shout comments, we declined an invitation to meet with them on a separate occasion as we were waiting for more detailed information than was available at the consultation meetings about the schemes to be put into the public domain, which was not easily forthcoming at the time in question.

Camley Street Neighbourhood Forum, at this early stage of our formal plan development work and subject to further detailed work, testing and consultation, proposes:

Employment diversity and uses: Camley Street Neighbourhood Forum is committed to retaining the current diversity of business uses within its area, and to resisting a monoculture approach to developing all workspace as small scale/sized office development. Existing businesses which specialise in food preparation, light industrial, fabrication, design etc give a mix of creative, white and blue collar jobs across a range of skill requirements, and thereby meet the needs of the wider local working population, not just young creative graduates.

Employment and housing locations within the neighbourhood plan area: Camley Street bisects the plan area, running roughly north to south. Camley Street Neighbourhood Forum will look to focus all employment/business activity to the east of Camley Street (north of the Granary St junction) which we think should be retained, improved and prioritised for business activities, and which is far less appropriate for housing. We will promote all housing and community/social development onto the west side of Camley Street (north of the Granary St junction).

Exemplary environmental and sustainability practice: Camley Street Neighbourhood Forum is committed to best levels of design, business and environmental practice which will build on existing initiatives driven by both business and residential community such as Camley Street Nature Park and the Camley Street Farm and orchard project. Existing and new businesses will be encouraged to develop actively carbon neutral buildings, facilities and operations.

Affordable housing: In St Pancras & Somerstown ward 38% households are below 20K income. Around one quarter of households (24%) in St Pancras and Somers Town ward have an annual equivalised income less than £15,000. (LBC Technical Analysis paper TAP 2010-01). Camley Street Neighbourhood Forum is committed to working with housing providers who can offer housing which is affordable to households with such low incomes.

A presumption for growth, change and improvement: Camley Street Neighbourhood Forum is committed to improving the neighbourhood, to ensuring that strong and growing companies can maintain a profitable presence here, alongside a naturally expanding residential community, and to



improving the townscape of an area we are please is industrial, industrious and a unique part of Camden's residential/community mosaic. The Forum challenges the notion – applied to housing as well as business – that the small scale, innovative and eclectic can no longer be afforded and that the bigger the building blocks in the community the better.

The tone and views set out in these applications set an unwelcome standard by which the area is judged to be ready for “improvement” and intensification/over-development. There is no reference to any existing positive factors - the actual level of productivity, community energy, exemplary environmental practice etc – in the area.

By this we mean that the applications establish a view of an area that is poor, poorly served and connected, doesn't “unlock its potential” (i.e. land values), is too low density, not enough public space etc. In so doing, these applications will set a precedent against which any future development of the area may be assessed until or unless a neighbourhood plan with a countervailing but more equitable, business like and community minded ethos comes into place.

These views are difficult to challenge on purely financial grounds and difficult to challenge for these applications. Camley Street Neighbourhood Forum also recognises that these early planning principles do not have the status of a formal neighbourhood plan document and therefore are not the formal influence on planning decisions which the eventual neighbourhood plan will provide. Nonetheless these are the tests which we will be subjecting planning applications to, including the two in consideration here in this twin track process.

2. Principle of development and land uses, especially for employment.

These developments represents a significant shift from light industrial use to office based (implicitly business services or creative) uses. Whilst we acknowledge that these are growing sectors in the wider economy and prevalent in Kings Cross and Camden and the neighbouring areas, we would ask the Council to take a view that the scale of this kind of business and the extensive other development opportunities in Kings Cross and elsewhere locally – the very fact of its presence and success across the borough and in the CAZ – require the planning authority to take a different view of Camley Street.

Global cities like London and vital and fast growing areas like Kings Cross and Camden require workshop, supply, support and small scale making and industry processes close at hand. The reduction of warehousing, distribution and light industrial space from this is unwelcome, further erodes a range of more and less skilled jobs from the local economy and will put further pressure on road deliveries from further afield to central London customers.

Camden's 2008 Employment Land Review acknowledged that warehouse activities in this area have become marginalised as a result of the significant changes occurring around the Kings Cross and St Pancras area and that it is increasingly impractical to seek to protect them in an area that is no longer a coherent industrial area.” This is reflected in so many words in the application.



However, Camley Street Neighbourhood Forum is fully supportive of Camden's requirement that a proposed mixed use development on previously industrial land, should not prejudice the continued industrial use in the area (criteria g of DP13). We consider that the proposed development is a threat to Cedar Way and the rest of the long established businesses on Camley Street because it will substantially change the character of the area and tip the balance of housing and employment / business structure to become less distinctive and more homogenous and indistinguishable from other parts of Camden.

We note, and see our comments on Local Context etc. below, that the application for 102 Camley Street in particular presumes the further development of similar sized developments to the north of Camley Street's east side – see e.g. the image to s 4.32 of the Planning Strategy document for 102 Camley Street.

The application documents claim that the residential use does not prejudice the employment in the surrounding area (par 5.28). The Forum disagrees. Camden would not accept the location of a fish or meat supplier next to a housing development so why would they accept housing development next to a fish / meat supplier? We note that these are precisely the kinds of businesses which Camden should be encouraging to stay in Camley Street in close proximity to their suppliers and customers.

3. Employment

The Employment space options strategy (ESOS, which covers both applications) proposes use classes as B1/B1c but uses are not clearly identified in floor space schedules. Which use will apply to which units? This affects the validity of the claims about which businesses will be able to occupy these spaces. If spaces (size, height) are not suitable for B1c (light industrial) it will all be B1 (offices).

Given that light industrial space sizes are in essence compatible with housing space, we would ask Camden to remain very vigilant against any employment space generated by the scheme being developed with a view to sooner or later change to residential use.

Given the large amount of small creative office space available within the borough, we would be dismayed if these units, joining an already crowded market in a period where there is great uncertainty about the future demand, needs and specifications for office space, were to be developed with an eye to their becoming residential units at an early stage. We would seek to resist permitted development from B1c to B1a, because this opens the door to future conversion to housing.

ESOS makes list of new space provisions (cafès, community spaces, access to canal, open public space, contributions to education and health facilities). We are very concerned that there is no verification that ALL these spaces in terms of design and real accessibility will remain public accessible in the long term.

ESOS provides data on business space requirements and on forecasts of increased employment density. This will limit the types of employment and businesses and will not enable the diversity of employment and business currently in the area to be sustained, for example industrial design and



fabrication, light manufacturing (size of equipment, space designed to accommodate equipment, machinery, waste facilities suitable for small manufacturing or high density of employment), etc. Many units will have access from public realm / street level making deliveries impossible.

ESOS confirms the planning statement that employment spaces will be “move on” spaces for SME emerging from incubator at 103. We note that there is provision of affordable workspace at reduced rent (only provision is 20% of space in 101 at 50% market rent for 5 years but this is also not set or identified) but that there is no indication of who will manage the space / who will be the agent / leaseholders / type of leases. Onsite management proposes bulk purchase of services. We are concerned that this will reduce flexibility for occupiers wishing to use their own providers of services. There is no indication of service charges, what they will include and how they will affect costs of unit.

The Planning Strategies suggest 20% of employment floor space will be let at 50% affordable rates but ESOS only appears to say this will be available for 101 not for 102. It is not clear why this should be so. Camden should seek further clarification of this and also check how 20% floor space translates into units and which units (there are different size units from 40 to 400 sqm) will be affordable.

4. Housing

Notwithstanding the statement which says that Camden’s Housing Officer has approved the overall balance of the affordable housing provision, we would reiterate (and note that the developers acknowledge this) that the ward in which this development is proposed is one of Camden’s poorest, with around one quarter of households (24%) in St Pancras and Somers Town ward “enjoying” an annual income less than £15,000. (LBC Technical Analysis paper TAP 2010-01).

We note that the affordable housing units appear to be north facing, on the lower floors, without access to balconies or gardens, and that they will be given separate and less generous entrances etc than the apartments for sale or rent to the private market. In 102 Camley Street there appear to be no affordable rent flats above 3rd floor

We would ask Camden to oppose strenuously any development that builds a “poor doors” approach into its ethos, design and management. The Forum objects strongly to such socially divisive development.

It forces there to be separate entrances and hence wastes space as well as establishing a literally ‘built-in’ social segregation between different groups of residents with all the negatives that implies. We would point to the largely successful and sustainable social model of Elm Village in which owner occupiers, residential tenants, shared owners and RSL/housing association tenants and residents with special needs are precisely not segregated and use the common areas, streets and open spaces on a neighbourly basis.

It is not clear from the application documents what levels of household income will be required for the affordable units or the degree to which the affordable units in this development match either Camden’s overall demography or the particular demographic pattern of those of its residents who are in greatest housing need. We would ask Camden to work vigorously to ensure that these



affordable units genuinely meet the needs of those in greatest housing need and that this be reflected in the S106 agreement. Affordable housing should be accessible by a variety of households including larger families.

Camley Street also represents an opportunity for Camden to gain affordable/shared ownership family flats (3 bedrooms) to enable hard-working local families to afford staying in the area as families grow and bring up children in non-overcrowded conditions. We note that Elm Village, the RSL managed housing scheme between Barker Drive and Rosendale Way, was one of the original 1980s shared ownership schemes and this has led to a solid and energetic residential community in the area. There is a shortage of such homes in the area which leads to many more young families are being forced to relocate outside the capital, forced to endure long commutes and expensive transport.

The Planning Strategies list students as a category of users of the developments. Are they planning to have student accommodation? It is likely the development will have several buy to let units. Are Camden or the developers willing to control this whether through planning or S106. The Camley Street Neighbourhood Forum will resist strongly any further risk of studentification of the area (which is the opposite of the diversity and inclusivity the developers' claim the developments will bring).

It is not clear how the provided cycle spaces will be available to visitors or general public. According to the drawings (LG floor) bicycle storage is also segregated between affordable and private.

5. Community benefit

The Planning Statements for 101 and 102 Camley Street make frequent reference to local benefits such as provision of local housing, affordable homes for "local" people, mixed and inclusive community, space for local businesses.

The development is proposed as an opportunity to create a balanced and mixed community. The current community is balanced and mixed, whereas the inflow of large scale residential developments will put further pressure on the rest of the businesses and the industrial estate, as well as to the three elements of the residential community – Camden's tenants' owner occupiers and the leaseholders and tenants of Places for People and therefore to the existing balance and diversity of the neighbourhood.

Unless there is an agreement that a share of the affordable rent / intermediate housing is going to be allocated to local residents (eg Camden families on Camden housing waiting list, or on the waiting list of housing association) then this is not a valid claim. We do not see this set out in the S106 documents or elsewhere. We refer to our comments on Housing below

It is unclear how the public open space which the application says will be part of this development will be managed, how it will be opened, which members of the public may be welcomed or excluded, etc. It is unclear where the children of any families would play, and whether these play areas would be accessible and secure. We would seek to see these resolution to these issues reflected in the S106 agreement.



We would seek further detail on the proposed community benefit to be delivered via the CIL agreements.

6. Local context, amenity, and townscape

Camley Street Neighbourhood Forum is very concerned about the cumulative impact of 101, 102 and 103 on the so called Camley Street Gateway, and on the development presumptions and/or ambitions which the applications portray. In the Planning Strategy, particularly for 102 Camley Street, assessment of local context presumes future developments at 104 Camley Street and even further up Camley Street that are played in support of the massing and positioning of these two developments.

For this subliminal support for these two applications, we refer to the Planning Strategy for 102 Camley Street, drawing at p20 / 104 listed as forthcoming development at p33 (section 3.3 Height and Massing) and the appearance of further similar sized developments on Camley Street's east side – see e.g. the image to s 4.32.

However much emphasis is put on improving the canal frontage the Camley Street Neighbourhood Forum remains deeply concerned about the towering height of the 12 storey buildings and how this will affect the whole "feel" of the area and the environment – which until the arrival of 103 was four storeys at most. Such high buildings on both sides of the canal and both sides of the road will create another canyon like St. Pancras Way, but more oppressive because Camley Street is narrower. Our area is at risk of becoming over-developed and visually soulless with no sense of community.

Notwithstanding the wind effect/microclimate studies we remain concerned about 'wind tunnel' effects along Camley Street and across the canal bridge particularly given the importance of this route as a pedestrian and cycle access route from Kings Cross to the north of the borough. . There is no indication of what these microclimate changes might be nor how they will be mitigated.

Camley Street Neighbourhood Forum is supportive of the comments from The Regents Canal Conservation Area Advisory Committee and the Canals and Rivers Trust about the impact of these two buildings, along with existing 103 Camley Street, in the pedestrian scale and heritage and wildlife context of the canal zone.

There is no provision for cycle safety during construction. Please recall that during the several-year construction project that is now wrapping up on Camley Street the road was narrowed for the constructors' convenience and no regard was paid to the safety of cyclists.

In this scheme the road was narrowed to one lane and the traffic lights were timed for cars, consequently a cyclist could not get from one end to another in the time allotted, all the while being chased or passed by cars speeding to make the crossing before oncoming traffic was released. Another 3-4 years of this will not be welcome.

Additionally, once these developments are complete, the Council should make Camley Street properly cycle-friendly by building a segregated cycle lane. By then it will have been traffic-light

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controlled one-way working for so long that it would not take much to make a permanent segregated cycle lane.

We find that the social analysis of the area is minimal. The list of existing amenities and open space does not take into account the existing initiatives and green space projects within the business and residential communities. The Council already knows that the area is short of health, GP, community and related facilities. Schools are at some distance and residents already complain of the difficulty in finding nearby primary school places. The applications make no mention of, for example, where the children of the families occupying the 4 bedroom flats would go to school.



Introduction

We have studied the information exhibited by Shaw Corporation and YourShout from 4pm to 8pm on 6 March 2014 and subsequently made available from 24 March 2014 on their web site at CamleyStreetGateway.org.uk. At the same time we have solicited opinions from residents and businesses in the Camley Street Area.

This document is the result to date of those deliberations. It is not final and we expect to continue to refine and update our response as more feedback is received and more details of the developers' plans and designs are revealed to us.

We understand that 101 (currently DPD) and 102 (currently Marigold) are two entirely separate development projects both of which have chosen to use Shaw Corporation and YourShout to represent them. We have therefore subdivided our response as follows:

Firstly items specific to either 101 or 102 but not both. These project-specific items are subdivided into the following sub-sections:

- The first sub-section, called 'Fundamentals' is where we examine the overall fit of the proposal with the strategic objectives of our emerging Camley Street Neighbourhood Plan.
- The second sub-section called 'Details' is where we comment on the finer grained factors specific to that building such as the number of entrances it has, the external aesthetic, and so on.

There is then a separate section on matters that apply equally to both projects. Under this heading are matters such as the design of the feedback forms issued at the exhibition and on the website, the overall level of detail revealed, project scope ambiguity, and so on.



A. Response to proposals for 102 Camley Street (Marigold)

1. Fundamentals

This is the wrong type of development for the location.

The developer proposes replacing an existing specialist food distribution business with a predominantly residential development offering a nominal amount of 'office / retail' space on the ground floor only. This does not fit with the land use policy of the emerging Camley Street Neighbourhood Plan which proposes that the eastern side of Camley Street north of the canal bridge is for business use by the food, creative and informatics industries.

In the limited time available to us we have found a business partner (Camden Brewery) that would be prepared to develop the land in line with our Neighbourhood Plan and have confirmed they have the necessary finance to put their plans into action and bring jobs to the area. We feel this demonstrates the financial viability of our land use policy and the social and economic benefits it would deliver to Camden.

We therefore object in principle to the proposed development and its associated change of use.

2. Details

As well as our fundamental objection to this proposal, our comments on the detail of what has been revealed so far are:

2.1 Hidden information

The architects' sketches strongly suggest that the adjacent plot at 104 Camley Street currently occupied by Hewlett Packard will be developed as a "partner building" to 102 but no proposals are revealed.

The proposed "pathway" in front of 102 leads straight to 104 (HP) and the simple vertical façade of the north face of 102 suggests a link with 104, but questions we asked about intentions for that building were answered with an unhelpful 'not part of this project'.

This is unsatisfactory and we feel it is disappointing and undermines trust that the developer cannot share more information about their ambitions for the adjacent space and their specific ideas.

The Neighbourhood Forum's position in relation to any future development of the site at 104 Camley Street will be consistent with the principles and details set out here in relation to 101 and 102.

2.2 Building façade

The building as proposed has a single sheer façade of twelve (exact number not stated on posters) storeys on its northern side that will directly overlook the rest of Camley Street. This is poor 'canyon making' design and is not acceptable.

2.3 Roof – rainwater collection plan

We think this is a potentially great idea. However, there is no indication on the plans as to where this will be collected (is there a reservoir somewhere?) nor which areas it will be used to irrigate (just the roof?)



2.4 Roof – Solar energy collection plan

We think this is a great idea but it is not stated whether this will be electricity generation or hot water generation or both? (We assume it will be only for 102?)

2.5 Dwelling unit size

It is disappointing that the dwelling units seem to be uniformly small and designed for one person or, at most, two.

Where are the units for families?

2.6 Dwelling unit orientation

We feel it is inappropriate to place dwelling units so close to the national rail lines where they will be detrimentally affected by dust and noise.

B. Response to proposals for 101 Camley Street (DPD depot)

1. Fundamentals

The proposal is to change the use of the plot currently occupied by DPD Distribution into a predominantly residential space with some provision for retail/office/industrial space.

This fits with the land use policy of the emerging Camley Street Neighbourhood Plan which proposes that the western side of Camley Street north of the railway bridge is predominantly for residential use.

The proposed change of use of 101 Camley Street from exclusively light industrial to predominantly residential is therefore appropriate and welcomed.

2. Details

Our comments on the detail of what has been revealed so far are:

2.1 Regeneration

The Camley Street / Granary Street intersection bounding 101 is pretty desolate, so regeneration is welcomed.

2.2 Internal segmentation

We think it is a poor idea that 'affordable' and 'non-affordable' units are physically separated within the building by the erection of partition walls across the internal corridors.

It forces there to be separate entrances and hence wastes space as well as establishing a literally 'built-in' social segregation between different groups of residents with all the negatives that implies. We would point to the largely successful and sustainable social model of Elm Village in which owner occupiers, residential tenants, shared owners and RSL/housing association tenants and residents with special needs are precisely not segregated and use the common areas, streets and open spaces on a neighbourly basis.



2.3 Green spaces at ground level

We are disappointed to see that once the plot boundaries are drawn the amount of ground level green space within the 101 development is zero.

2.4 Green spaces at roof level

We are disappointed that the roof atop the 12th storey of 101 was painted a pleasing light green on the sketches and described by the designer as green/planted space with "possible use as allotments" who was then unable to say how deep the soil was or if it was raised beds or what. Our concern is that the implementation will be little more than a few potted plants and bushes or some 'naturalised moss meadow' planted in at most 5 cm of "soil" that at the first hint of sunshine becomes as horticulturally attractive to green plants as the midsummer Sahara.

We suspect that putting a layer of soil on the roof sufficiently deep to maintain a minimally-sustainable growing area would add the weight of at least one, possibly two more storeys - and therefore would most likely not be commercially viable.

This seems non-feasible and a superficial nod to trend as well as a specious attempt to say the development is 'green'.

C. General comments applicable to both 101 and 102 (DPD & Marigold)

1. Feedback Questionnaire

The feedback questionnaire did not appear to have been designed to gather feedback on the specifics of the building proposals. Instead it seemed to have been designed to elicit as many 'yes' responses as possible.

The majority of the questions asked about unquantified generalities that most people would find hard to disagree with, e.g., Do you support . . . increased public access, . . . improved public spaces, . . . improved lighting, . . . new and improved access routes, . . . etc.

Misleadingly, it also asked for opinions on infrastructure that the development project itself would not deliver, e.g. ". . . a new pedestrian canal bridge . . ."

Plainly it has been designed to get as many "yes" answers as possible and several residents made the point that "the questions were phrased in such a way that one was more or less bound to agree".

2. Ambiguous project scope and boundaries

It is disappointing that several of the diagrams give the impression that the projects will develop the green spaces along the canal, install new access paths and staircases and deliver a new footbridge. We understand this is actually NOT the case.

In general it is NOT clear from most of the architect's sketches on display where each project begins and ends and exactly which enhancements it will deliver. Our understanding is that each project will build only what is within the boundary of its own plot and Camden will be commissioning the building of all that is in the public space with section 106/CIL money.

3. Enterprise, Businesses & Local Employment

We think it's a great idea to provide space for start-ups and new businesses.



It was disappointing that the business space provided in these developments seems to be just office and retail space; no manufacturing or creative studio space of any sort at all such as currently co-exists very well with the established residential neighbourhood.

We feel that this means that the project will not benefit our local working young people – it will actually destroy existing jobs.

4. Affordable Units

We think it is a great idea to provide affordable accommodation.

However, there is no indication of what ‘affordable’ means and we suspect it will be beyond the means of those on an average salary.

There is no indication of how the affordability will be maintained on change of ownership such as with a shared ownership scheme that has been a successful component of the adjacent neighbourhood.

5. Design

It is disappointing that the designs for both buildings seem relatively ordinary. Just the usual linear facades with balconies tacked on (albeit at fetchingly rakish angles). We don’t support more of that; we already have enough at the new build at 103 and other tower blocks nearby.

6. Canyon effects – visual and wind tunnel

However much emphasis is put on improving the canal frontage there's no ignoring the towering height of the 12 storey buildings and how this will affect the whole "feel" of the area and the environment – which until the arrival of 103 was four storeys at most. Such high buildings on both sides of the canal and both sides of the road will create another canyon like St. Pancras Way, but more oppressive because Camley Street is narrower. Our area is at risk of becoming over-developed and visually soulless with no sense of community.

There were also concerns about ‘wind tunnel’ effects along Camley Street and across the canal bridge. There is no indication of what these microclimate changes might be nor how they will be mitigated.

7. Height

It is disappointing that most residents felt they did not get clear answers to questions about height, especially at 101 DPD as the roadway is at different levels as it wraps around the building.

As far as we can work out, the rooftops of 101 and 102 will be level with the rooftop of the new build at 103. But we are not sure.

8. Information shared on web

We think it is great that the information presented at the public exhibition on 6 March 2014 is now available on the website CamleyStreetGateway.org.uk. However it is disappointing that no new information has been added in the interval since the exhibition.



It is not useful that the information available on the website for 101 and 102 is presented in different formats. The information for 102 Marigold (the development likely to proceed first) is presented in a proprietary [Scribd](#) format that cannot easily be searched or printed by most web users and non-subscribers. However, the information for 101 DPD, which is at least two years from commencement, is presented as a standard PDF that can be easily searched and printed. We would like all information to be presented using de-facto web standard document formats such as PDF for easy searching and printing

9. Exterior Façade

We think it is a great idea that the exterior façade does not distinguish between affordable and non-affordable housing.

10. Internal segmentation

We think it is a poor idea that affordable and non-affordable units are physically separated within the buildings. It is socially divisive and wastes space.

We repeat the same comment as we made for 101 above about the segregation of different categories of residents which is unnecessary.

11. Multiple separate entrances

The internal segmentation of the buildings also forces there to be multiple separate entrances.

We think it is a poor idea that each building has multiple entrances to accommodate the social division (101 DPD has three and 102 Marigold has two).

We feel that 101 should have at most two entrances (facing each other in the middle of the building) and 102 should have just one.

We feel it is a poor idea to segregate the different occupants of the building by forcing them to use different entrances with different security arrangements. Forcing a subset of residents to use a less secure entrance is not good. It exacerbates social segregation – unhelpful in such a small bounded space.

11. Security

We think it is a great idea that both buildings will have 24 hour concierge service.

However it is unclear exactly where this concierge service will be located.

13. Plot Boundaries

It was NOT clear from most of the architect's sketches on display where the ownership boundaries of the properties were. This is important as our understanding is that the developers will build only what is within the boundary of their site and Camden will be commissioning the building of all that is in the public space with section 106/CIL money.

14. Environmental Performance and Green spaces

Camley Street neighbourhood forum intends to work with businesses, residents and developers to ensure that all existing and new projects in the CSNF designated area contribute substantially to the



intention to make Camley Street the greenest street in London. This is a long-term ambition for which we intend to work collaboratively and to set particular targets and to identify ways of improving existing performance, requesting and requiring all new entrants to the area to set out how their business, developments, etc., can be made to contribute to this in substance and not just cosmetically or perfunctorily. We invite the developers to talk with CSNF about ways in which we might collaborate on this.

We are disappointed that once the plot boundaries are drawn the amount of new green space contributed by these developments is actually much less than it appears to be. In the case of 101 there is NO green space at ground level.

15. Roof – Solar energy collection

We think this is a great idea but is only mentioned in relation to 102 Marigold but not 101 DPD – why not both?

Is the intention that this will be electricity generation or hot water generation or both?

16. Roof – Wind energy collection

We note that this is not mentioned at all.

17. Transport

No mention was made of how this coordinates with the existing traffic to and from the northerly parts of Camley Street and the traffic expected from the construction and operation of the HS2 depot at the top of the road.

18. Air pollution

We are living and working next to King's Cross which has the most polluted air in London. With the increasing numbers of high rise buildings being erected there is a concern that these will collectively slow the natural dissipation of airborne pollutants. There is a need to model these effects across a large area and not just for individual buildings.

19. Canalside habitat

Existing shrubbery by the canal, although scruffy, provides a continuum of habitat for wild life together with Camley Street Natural Park - the impact on wildlife on the canalside and at the park of removing this and replacing it with concrete should be studied.