

101 Camley Street, London, NW1 0PF

in the London Borough of Camden

planning application no. 2014/4385/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Demolition of existing buildings, and redevelopment to provide a mixed use development in buildings ranging from four to eleven storeys comprising 2,220 sq.m of employment floorspace (Class B1), 121 residential units, works to facilitate the provision of a pedestrian bridge over Regent's Canal to 103 Camley Street and other public realm and enabling works.

The applicant

The applicant is **Gateway Evolution Ltd** and the architect is **KSR Architects**.

Strategic issues

The **principle** of a mixed use development on this site on the edge of the Kings Cross opportunity area is strongly supported. The uplift in **employment** floorspace and the inclusion of follow-on workspaces linked to the incubator and start-up workspaces at 102 and 103 Camley Street is welcomed. The **design** and **public realm** improvements including a new pedestrian bridge over Regent's Canal linking to other new public spaces will have a significant contribution to the area and are fully supported. Matters of **housing mix**, **residential quality** and **children's playspace** are acceptable.

The 25% **affordable housing** offer is welcomed although the **viability** appraisal needs to be independently verified to confirm that it is the maximum reasonable amount that the development can provide. More information is required on matters of **density**, **inclusive access**, **energy** and **transport** for the scheme to fully comply with the London Plan.

Recommendation

That Camden Council be advised that the application broadly complies with the London Plan but that the issues set out in paragraph 76 of this report should be addressed before the scheme is referred back to the Mayor.

Context

1 On 4 July 2014 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 14 August 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that

view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1B and 1C of the Schedule to the Order 2008:

Category 1B(b): *"Development which comprises or includes the erection of a building(s) in Central London with a total floorspace of more than 20,000 square metres"* and

Category 1C: *"Development which comprises or includes the erection of a building more than 30 metres high outside the City of London."*

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is 0.35 hectares in size and roughly rectangular in shape. It is bound by Camley Street to the east, Granary Street to the west and Regent's Canal to the north. The southern tip of the site is at the junction where Granary Street meets Camley Street. Beyond the canal to the north is 103 Camley Street, where a mixed use development is currently under construction (see planning history in paragraph eight below). The site is currently occupied by a 1,490 sq.m Class B8 warehouse with ancillary storage, offices and loading areas used by DPD, a postal distribution company. Due to the site's physical restrictions on movement for delivery vehicles and the changing nature of large scale distribution and logistics companies, the site is no longer suitable for the current occupiers who are looking to relocate.

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

7 Camley Street is a borough road, with the nearest part of the Transport for London Road Network (TLRN) being the A400 Camden Street approximately 450 metres to the west. Four services (routes 46, 214, 45 and 63) are available within 640 metres from bus stops to the south at the junction of Camley Street with Goods Way. Access by rail and Underground is provided at Kings Cross St Pancras to the south of the site and Mornington Crescent to the west. Although these are a 10 – 12 minute walk from the site they offer a wide range of national and international rail services as well as London Underground services on the Victoria, Northern, Piccadilly, Circle, Metropolitan and Hammersmith & City lines are available. As such, the site records the highest Public Transport Accessibility Level (PTAL) of 6b.

Planning history

8 Although there is no relevant planning history on the site, it forms part of a collection of three sites (101, 102 and 103 Camley Street), which although under separate ownership, are being promoted for comprehensive mixed use redevelopment by different developers over a similar timescale, and which share common regeneration objectives. 103 Camley Street received planning permission in April 2012 for a mixed use development of up to twelve storeys, to contain 307 student accommodation units, forty residential units, incubator business space and two retail units,

together with public realm improvements. This application was referred to the Mayor, who at stage one, advised Camden Council that the proposals were broadly acceptable in strategic terms, although further information was required on the incubator business space, public realm and canal frontage, inclusive design, energy and transport report reference: PDU/2733/01). At stage two, these issues had been addressed, and the Mayor advised Camden Council that he was content for them to determine the case itself (report reference: PDU/2733/02). The planning permission was subsequently issued, and this development is now at an advanced stage on site.

9 A pre-application meeting was held on 20 May 2014 for the site at 102 Camley Street to discuss a mixed use scheme comprising 154 residential units and 1,620 sq.m of employment floorspace, and an advice report was issued on 3 June 2014. An initial pre-application meeting and follow-up meeting for the application site (101) were held on 29 May and 27 June 2014, and advice reports were issued on 11 June and 14 July 2014 respectively. Alongside this planning application, an application has also been submitted for the proposals at 102 Camley Street and this has also been referred to the Mayor.

Details of the proposal

10 The proposals seek to demolish the existing buildings and redevelop the site to provide a mixed use development comprising 2,220 sq.m of flexible commercial/employment floorspace on the lower ground and upper ground floors and 121 residential units on the upper floors with on-site affordable housing, together with a basement for plant/storage and communal amenity space. The proposals also include the provision of new areas of public open space and a new pedestrian bridge over the Regent's Canal connecting to the site at 103 Camley Street and public realm works. The scheme includes two buildings ranging in height from four to eleven storeys, and includes a central east-west route through the site with a feature stair within the public realm.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

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

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Camden Core Strategy; the 2010 Camden

Development Policies Development Plan Document (DPD); the Camden Site Allocations Local Development Document (adopted September 2013), and; the London Plan (with 2013 Alterations).

13 The following are also relevant material considerations:

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

Land use principles

14 As set out in paragraph five, the site is currently occupied by a Class B8 employment use, but is no longer suited to the current occupiers needs. Although the site is surrounded by other similar type employment warehouses, neither the site nor those surrounding it are identified in the London Plan as a Strategic Industrial Location (SIL), and are not within the Council's locally designated Industry Area as set out in the Core Strategy. Camden as a borough however, has one of the lowest stocks of industrial and warehousing space among London boroughs, and London Plan Policy 4.4 places Camden within the restricted transfer category for the release of surplus industrial land. The Council's Development Policy DP13 also resists the loss of existing employment floorspace outside the main Industry Area, unless it can be demonstrated that continued employment use is unviable or unsuitable.

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

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

17 The proposals include approximately 2,220 sq.m of commercial/employment floorspace (Class B1/B1c), which represents about a 30% uplift in employment floorspace than is currently provided on the site. The application documents also confirms that the employment density will be significantly increased from 20 persons currently employed, up to 300-400 persons anticipated in the new B1/B1(c) accommodation, due to a more efficient layout, modern design and flexible space.

18 The application documents state that it is anticipated that 20% of the employment space will be provided at a discount of 50% of market rent for a period of five years to facilitate new start-up enterprises or SME's, particularly those emerging from the incubator at 103 Camley Street in connection with University College London (UCL). This is strongly supported in line with London Plan Policy 4.10 (c) which encourages applicants to work with higher education institutions and local business to provide a range of start-up and 'grow-on' spaces. The documents also confirm that unit sizes will range from 418 sq.ft up to 1,913 sq.ft and include the ability to combine or sub-divide units to provide larger or smaller studio units as necessary. The applicant states that flexibility will be applied in terms of lease terms and length of occupation, and limits will be placed on rental guarantees and rental deposits so as not to unnecessarily tie-up cashflow for business needs and expansion. These aspects of the scheme are strongly supported and the Council should secure these provisions through the section 106 agreement to ensure delivery.

19 The documents also include details of on-site management regimes and a mentoring scheme to support occupying businesses, which is fully supported and should be secured through the section 106 agreement. As noted at pre-application stage, GLA officers still require some further details on how the units will be marketed and the extent of fit-out to assist start-up businesses.

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

Housing

21 The proposals include the provision of 121 residential units and the table below provides an indicative breakdown of unit types and tenures:

Unit type	Private	Affordable rent	Shared ownership	TOTAL
Studio (1P)	4	0	0	4
One bed(1B2P)	16	2	1	19
Two bed (2B3P/2B/4P)	41	5	13	59
Three bed (3B5P/3B6P)	29	7	0	36
Four bed (4B5P/4B6P)	1	2	0	3
TOTAL	91	16	14	121

Table 1: Unit schedule

Affordable housing

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

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

24 The applicant has submitted a viability appraisal with the application which has been supplied to the GLA. It confirms the methodology applied to assess the development's economics and includes a number of scenario models with different quanta of affordable housing. The report confirms that the proposed affordable housing offer of 25% floor area is on the edge of being viable, with the toolkit showing a circa £2.7 million deficit, which the developer is willing to accept based on predicted market growth. GLA officers also recognise that the toolkits do not include for subsidised rents for the commercial floorspace, as Camden Council officers made it clear that the delivery of discounted employment space is not a priority in terms of social infrastructure delivery over the need for affordable housing. The toolkits therefore assume a commercial income at a level much higher than that actually achieved in the Camley Street area of Camden, and the applicant commitment in this regard is appreciated from a strategic perspective.

25 The tenure split proposed is 67.5%:37.5% affordable rent: shared ownership, which broadly complies with the London Plan and the Council's Core Strategy. The inclusion of affordable rent units is strongly supported in accordance with the London Plan and the NPPF in order to maximise affordable housing delivery for the wide range of Londoner's requiring an affordable home.

26 Whilst this proportion of affordable housing is welcomed, in order to comply with the London Plan Policies noted above, the submitted viability appraisal needs to be independently verified by the Council or their appointed consultant and the results supplied to the GLA prior to the Stage 2 referral.

27 GLA officers need to understand the applicants' timescales for delivery. If, due to the phasing of the scheme, the units will not be delivered in the short-term, officers would support the inclusion of a financial review mechanism within the section 106 agreement. This should be designed to allow any additional financial surplus to be captured prior to implementation/between phases, that may be generated by uplift in residential sales values. Such a mechanism would need to be designed so as to ensure an appropriate proportion of any financial surplus would be awarded to the Council, and ring-fenced for the delivery of additional affordable housing units. Details of any such mechanisms should be provided to the GLA as part of the Stage 2 referral, with agreed S106 terms also confirmed.

Mix of units

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

29 The scheme includes a good proportion of family units (those with three or more bedrooms), at 32%, with 30% of the affordable units being suitable for families, which is strongly supported.

30 London Plan policy 3.9 promotes mixed and balanced communities which can be achieved by providing a mix of tenures across the development and ensuring that the scheme is tenure blind. The floor plans show that the affordable accommodation will be provided within the lower floors of the northern building, with the market sale units contained within the southern building and the upper floors of the northern building. Given the relatively small site area and location of the amenity space/public open space at the northern end of the site near the canal, GLA officers are satisfied that the scheme balances the objectives of providing a mixed and balanced community and ensuring management issues between tenures can be suitably accommodated.

Residential quality

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

32 The residential quality is generally high across the scheme. The design and access statement shows how the scheme complies with the design guidance in Annex 1 of the Housing SPG and the submitted plans demonstrate that all units have been designed to meet or exceed the internal space standards, with private balconies of at least 5 sq.m proposed, which is supported. Dual aspect units have been maximised by the stepped elevation design, and there are no single aspect north-facing units, which is welcomed. Generally the layout provides no more than seven units per core which is also welcomed.

33 The provision of both private and communal amenity space and publicly accessible amenity area is fully supported. A total of 1,406 sq.m of private balconies will be provided, 420 sq.m of roof-top communal amenity space and 311 sq.m of further communal amenity at Camley Street level, together with 1,285 sq.m of public open space including playspace, with a total of 3,573 sq.m of amenity including an internal meeting/events room for residents.

Density

34 London Plan policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the density matrix in support of this policy. Based on the characteristics of the location set out in paragraphs four to five, the site can be regarded as having an 'urban' setting, although given the proximity to Kings Cross a density closer to the 'central' setting density range could be appropriate. For an 'urban' setting, the matrix suggests a residential density in the region of 200-700 habitable rooms per hectare, and for a central setting, 650-1,100 habitable rooms per hectare. The Policy makes it clear that the matrix should not be applied mechanistically, as other factors such as local context, residential quality and public realm will also determine the acceptable density range.

35 Whilst the applicant has not confirmed the density figure, based on a site area of 0.35 hectares and 121 units, the scheme would have a density of 346 units per hectare or 908 habitable rooms per hectare. This figure falls between the ranges of an 'urban' and 'central' setting, and indicates that the density could be appropriate for the setting. However, an assessment of the density using the appropriate calculation still needs to be provided, and should be calculated based on the net residential site area in accordance with paragraph 1.3.47 of the Mayor's Housing SPG. Density figures should also be provided as both units per hectare and habitable rooms per hectare. If the final density figure falls within the upper range, the applicant should take note of paragraph 1.3.41 of the Mayor's Housing SPG regarding the impacts of high densities on local services and infrastructure.

Children's play space

36 Children and young people need free, inclusive, accessible and safe spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.

37 Applying the methodology within the Mayor's Play and Informal Recreation SPG (2012), and based on the unit types and tenures, the expected child population from the development is

41, requiring a total of 412 sq.m of children's playspace on-site, of which about 177 sq.m is required for the 0-5 age group and should be on-site. As detailed in paragraph 35 above, the scheme includes 420 sq.m of roof-top communal amenity space and 311 sq.m of further communal amenity at Camley Street level, together with 1,285 sq.m of public open space including playspace, and so there is adequate scope for door-stop play to be incorporated into the development. The site is also fortunate to be located close to both St. Pancras Gardens and Camden Natural Park (both within five minutes' walk to the south-west), and the applicant has included a commitment to an off-site contribution of up to £183,797 in the draft heads of terms to enhance playspace facilities at St. Pancras Gardens. The Council should attach conditions to secure final details of the landscaping and playspace equipment to be provided.

Urban design

Layout and ground floor activity

38 In the initial pre-application meeting report, the high proportion of publicly accessible open space on the site was commended. In particular the area to the north adjacent to the proposed footbridge was strongly supported as it will link with the collection of green spaces being developed across the gateway sites at 101, 102 and 103 Camley Street, and facilitate/improve pedestrian connection to the towpath and the canal. As noted in the initial pre-application report, these connected areas of new public space, and in particular the provision of a new footbridge to facilitate connection, is strongly supported in strategic terms, and meets the objectives of London Plan Policies seeking to improve access to London's network of waterways.

39 At the initial meeting, GLA officers raised concern over the necessity of the public route through the centre of the site connecting Granary Street with Camley Street. There was concern that the provision of the additional route could compromise the north area of public space and footbridge by diluting pedestrian activity and usage. It was also noted that for a fairly small site, it was disappointing that two sets of steps and two platform lifts were included. The logic of the route's positioning was also questioned, as whilst a gap between the buildings giving views of Kings Cross could aid legibility from further west, it was noted that the route does not lead anywhere on arrival at Camley Street. There was also concern that the route could appear like a private plaza with residential entrances rather than an active public street.

40 Some other aspects of the design and layout were also questioned at the initial meeting including, the location of residential entrances in particular to the affordable units, how the stair and footbridge would connect to the building, and the over articulation of some of the elevations with protruding balconies and contrasting materials.

41 At the follow-up meeting these issues were discussed in more detail with both the architect and Camden Council officers. The Council has a strong desire to secure an aligned route from St. Pancras Way through both the St. Pancras hospital site to the west and this site to Camley Street. This location was broadly seen as the most suitable due to the location of a number of heritage assets on the hospital site. The Council have also taken the view that the fine urban grain of the local area suggests that breaking up this site with a route best reflects the surrounding context.

42 The changes to the Camley Street frontage and opening to the public link along this edge of the scheme are welcomed. The additional changes made since the follow-up meeting offer a further improvement to delineate between public and residential access at this end of the link. The opening up of the corner entrance to the affordable block is also a positive change and improves the spatial relationship with the adjacent green space and legibility of this entrance. The subtle changes to the architectural treatment of some of the elevations are also welcomed.

43 The applicant and the Council are both aware that GLA officers still question the need for the public route through the centre of the site, primarily because at the end of this route Camley Street provides little sense of arrival or clear opportunities for pedestrian movement further to the north of the site. GLA officers also retain the view that clearly delineating between public and private realm within the spatial constraints of the site is a challenge.

44 However, Camden Council's objective to improve local permeability is acknowledged, and a balanced compromise was agreed at the end of the pre-application process whereby the route is retained, but acts as a piece of public realm rather than simply a route through the site. The proposals for the route now seek to create a destination where people can sit and enjoy the space, and not just pass through it. The removal of the platform lift and entrance canopy helps to alter the perception of the route to achieve this objective. The widening of the steps is also welcomed and enables them to act as a piece of public realm similar to a grand staircase where people can use the space rather than pass through. Overall, the amended layout helps to define the entrance to the residential lobby, which is welcomed, and the 450mm 'seating steps' provide the opportunity to extend the public realm and create a destination point, whilst also providing public access through the site with the adjacent pedestrian stair.

45 The detailing of the landscaping strategy will be key to defining a legible continuation of the route from the hospital development and also ensure adequate landscaping opportunities are incorporated so the space reads as an area where people can spend time. The strategy should explore means of continuous surface treatment for the entirety of the link between Camley and Granary Street, and the positioning of trees, seating and other soft landscaping to further reinforce this, and the Council should attach conditions or section 106 obligations to secure finer details of the landscaping strategy and on-going management/maintenance for the area.

Form, height and architecture

46 The design of the building responds to that of nos. 102 and 103 Camley Street in order to form a refined and well-considered overall massing composition. The form and massing strategy is therefore supported and raises no strategic issues. The site falls within the protected vista from Parliament Hill towards St. Paul's (LVMF protected vista 2A.1). The applicant has submitted a townscape and visual impact assessment and verified views, including a number of local views and the LVMF view, which demonstrate that the building will remain below the threshold plane and comfortably beneath the base of the drum and towers of St. Paul's. The maximum height of the building at G+10 storeys is therefore acceptable in strategic terms.

47 The architectural response is strongly supported. The refined materials palette of high quality brick clad bands and large expanses of glazing with deep reveals, form a simple horizontal emphasis that continues around the full perimeter of the building. The articulation of some of the elevations has been simplified which is welcomed.

Inclusive design

48 The aim of London Plan policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. Inclusive design principles if embedded into the development and design process from the outset help to ensure that everyone, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. Further information can also be found in the consultation draft of the Accessible London SPG: <http://www.london.gov.uk/priorities/planning/consultations/draft-supplementary-planning-guidance-on-accessible-london>

Public realm

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

50 A stepped route is proposed in the centre of the site between Granary Street and Camley Street, with a further set of steps and platform lift proposed to the new bridge over the canal adjacent to the primary amenity space. The bridge link and lift access proposed is welcomed as it will significantly increase the accessibility of the adjoining sites on Camley Street. As suggested at the pre-application, level access to the residential cores is possible from both sides of the sites which is welcomed.

Parking

51 Access to the site from public transport is not easy for people with limited ability due to the surrounding topography and location of public transport. It is therefore welcomed that thirteen bays will be provided for the wheelchair accessible/adaptable units. It is not clear from the access statement how the requirement for blue badge parking bays for the employees and visitors to the site will be accommodated, in line with London Plan Policies 3.8 and 6.13, and Table 6.2. As noted at pre-application, it is accepted that due to the site's constraints in terms of size, topography and the need to maximise the public realm, additional car parking cannot be provided. The applicant should consider further how the needs of wheelchair residents would be accommodated, for example mobility scooter storage, drop-off facilities and off-site blue badge parking nearby.

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

Residential units

53 The design and access statement demonstrates that all residential units have been designed to the Lifetime Homes standard and that 13 wheelchair accessible or easily adaptable homes (just over 10%). This is welcomed and in line with London Plan Policy 3.8. The design and access statement includes typical floorplans showing that the design of the residential units meet the sixteen Lifetime Home standards and showing the layout of the wheelchair accessible homes. The plans indicate where the wheelchair accessible homes are located, which are distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people.

Marketing

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

Climate change adaptation

Energy Strategy

55 The applicant has broadly followed the energy hierarchy and is proposing to reduce carbon emissions by 44%. In total, 13% savings are suggested from energy efficiency measures - both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting. Further information is required on how the demand for cooling will be minimised, in line with policy 5.9. sample DER and TER sheets including efficiency measures alone (i.e. excluding CHP and PV) to support the savings claimed. Further information should also be provided on how the site wide emissions were calculated as they seem unusually high for the size of development.

56 In terms of district heating, the applicant has identified the Kings Cross DHN within the vicinity of the development. Evidence of correspondence with Metropolitan (the network operator) has been provided, confirming that connection to this network is deemed unviable due to the presence of the canal separating the site from the network. The applicant should contact energy officers at Camden to determine whether there is an opportunity to connect to the network being developed to the south of the application site, with an energy centre at Phoenix Court. Evidence of correspondence should be provided to demonstrate that these discussions have taken place and that the opportunity has been investigated.

57 A commitment to ensuring that the development is designed to allow future connection to any district heating network, should it become available is required and should be secured would need to be secured in any s106 agreement, together with a commitment to a single site wide energy network (with connection from all apartments and non-domestic building uses) supplied from a single energy centre. A drawing showing the route of the heat network linking all buildings on the site should be provided.

58 The applicant is proposing to install a gas fired CHP unit, which would meet 25% of the heat demand for the development. The applicant states that this would contribute an 11% reduction in regulated carbon dioxide emissions. The applicant should provide a feasibility assessment to demonstrate that this is a viable solution for the site. The assessment should include information on monthly load profiles (heat and electricity), proportion to be met by the CHP, installed capacity of the engine and proposed electricity sale and management arrangements for the system. Please refer to the GLA guidance (http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final_2.pdf) for further detail on the information to be provided.

59 In terms of renewable energy, 25kWp of solar photovoltaic panels are proposed for the roof, together with ground source heat pumps to provide 25% of the heat demand and supplement the CHP, and resulting in carbon dioxide emission savings of 29%. This approach is not supported as it appears unnecessarily complicated and is likely to fail in realising the carbon savings claimed. The applicant should follow the energy hierarchy in developing the energy strategy and ensure that the system proposed is optimised. The heating system should be designed to be suitable for easy retrofit of district heating. If, following a feasibility assessment, CHP is considered feasible and is proposed, its use should be optimised before considering renewables. If CHP is proposed, we would expect it to meet all the domestic hot water demand and at least a proportion of the space heating demand for the site. If CHP is found unviable and heat pumps are proposed, they should be optimised to achieve high efficiency and carbon savings.

60 In summary, the carbon dioxide savings exceed the targets set within policy 5.2 of the London Plan however the comments above should be addressed before energy policy compliance can be verified.

Sustainability

61 The applicant has submitted relevant Code for Sustainable Homes and BREEAM pre-assessment reports. It is intended that all homes meet Code for Sustainable Homes Level 4 and 'Very Good' for the commercial units, aspiring to 'Excellent.'

62 The energy strategy sets out a number of techniques proposed to reduce energy consumption and cut carbon emission in line with the Mayor's standards. Low energy lighting, high efficiency boilers, water efficient appliances, and water metering are proposed, together with rainwater harvesting, green/brown roofs, bird boxes and allotment spaces, which would also make an important biodiversity contribution. These measures are welcomed and should be secured by way of condition.

63 The scheme addresses Blue Ribbon Network policy 7.24 through the provision of the new ramp. This is welcomed, but in addition, consideration should be given to using water based transport for freight, particularly during demolition and construction phases. Conditions securing these measures would be appropriate.

Transport for London

Car parking

64 The development is car free, with the exception of 13 blue badge spaces which are accessed from Granary Street. The applicant is willing to enter into a permit free agreement which will prevent occupiers from applying for a permit to park on street. This approach is supported in accordance with London Plan Policy 6.13.

Trip generation

65 An assessment of trip generation has been carried out using the TRAVL database. Due to the car free nature of the development, the assessment indicates that the traffic impact will be less than the current use and the additional demand can be accommodated on the strategic road and public transport networks, and this is not disputed.

Cycle parking

66 A total of 237 secure cycle parking spaces are proposed to serve the residential development including 12 for visitors. 11 cycle parking spaces are proposed to serve the commercial development. Although this meets the adopted London Plan requirements it is slightly lower than emerging standards in the draft Further Alterations to the London Plan (FALP) published in January 2014 which would lead to a total requirement of 241 spaces to serve the residential development (2 spaces for all units above 45 sq.m and 3 spaces for visitors) and 24 long-stay spaces to serve the B1 use as well as one short-stay space for visitors. The visitor spaces should be accessible from the street frontage. The applicant to consider a higher level of provision to reflect the emerging standards in FALP.

Walking and cycling infrastructure

67 TfL strongly supports the proposal to deliver a pedestrian bridge suitable for use by cyclists and pedestrians across Regent's Canal as it would improve pedestrian and cycle links and offer an extension of a high quality public realm. The development will provide the bridge foundations and a proportionate financial contribution towards other construction costs.

68 The nearest cycle hire docking stations are located 500 metres walk from the site either to the west on Royal College Street or to the south on Pancras Road. There is currently a gap in the network and increased residential development will cumulatively increase demand leading to a need for an additional docking station. Although no detailed site surveys have been carried out yet, there may be potential to site a station on Camley Street to the north of the canal or possibly on Granary Street; a 25 metre uninterrupted space would ideally be needed. Further discussions and site visits to include Camden Council transport officers, the applicant's consultants and TfL will be arranged to identify suitable locations. The total cost of providing a docking station (excluding land) is £187,000. Contributions should be shared between this development and the adjacent site at 102 Camley Street to cover the costs of a new docking station within the area.

Travel plan

69 A draft travel plan has been provided as part of the application. The finalised plan will need to be secured, along with any necessary measures or financial contributions as part of the section 106 agreement for the site. TfL also recommends that a separate delivery and servicing plan is produced.

Construction

70 A construction management plan will also be prepared and secured through a section 106 agreement. This should follow TfL's guidance on preparing and implementing such a plan. Further information is available at <http://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans#on-this-page-1>

71 The plan should include details of vehicle booking systems, the use of re-timed or consolidated construction vehicle trips, protection of vulnerable road users and using operators committed to best practice as demonstrated by membership of TfL's Freight Operator Recognition Scheme (FORS) or similar. Given the location of the site, use of the adjacent canal for movement of construction material is encouraged.

Mayoral CIL

72 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The charging rate for Camden is £50 per square metre.

Local planning authority's position

73 The applicant has had a number of pre-application meetings with Camden Council, and it is understood that the Council officers have been positive about the regeneration of the sites and those nearby. The Council's position on the formal planning application is unknown at this stage.

Legal considerations

74 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

75 There are no financial considerations at this stage.

Conclusion

76 London Plan policies on the **principle of development, housing, urban design, views, inclusive access, sustainable development and transport** are relevant to this application. The application complies with the majority of these policies and is strongly supported but further information is needed in order to fully comply with the London Plan. The potential remedies to issues of non-compliance are set out below:

- **Principle of development:** The principle of the development is strongly supported on this site on the edge of the Kings Cross opportunity area. The uplift in employment floorspace, including the provision of affordable workspaces for SME's and start-up business, and the mixed nature of the development is welcomed in strategic terms.
- **Housing:** The proposals include a mix of units, and a good proportion of family sized units. The residential quality is generally acceptable. The affordable housing offer at 25% is welcomed although the viability appraisal needs to be independently verified to confirm that the affordable offer is indeed the maximum reasonable provision that the scheme can deliver. More information is required on density.
- **Urban design:** The design and layout of the proposal is well thought-out and makes significant contributions to the public realm including a new pedestrian bridge over Regent's Canal connecting to other public spaces on nearby sites, which is fully supported. The massing and height of the building and the views assessment is also supported.
- **Inclusive access:** Overall the scheme responds well to the principles of inclusive design subject to conditions and some minor clarification on blue badge parking spaces.
- **Climate change:** The energy hierarchy has been followed and 44% carbon dioxide savings are expected. Whilst supported in principle, further information is required to verify the savings. Other sustainability, Blue Ribbon Network and climate change adaptation measures should be secured by way of condition
- **Transport:** There is not expected to be an adverse impact on the operation of the strategic transport network as a result of the development. A section 106 agreement should be used to secure the travel plan, delivery and servicing plan and construction management plan. As well as building the foundations of the proposed footbridge and

associated works including the platform lift, an appropriate financial contribution to the construction costs of the footbridge and a cycle hire docking station should be provided. Further discussions and site visits will be needed to identify a suitable location for the docking station within the area. TfL would also encourage a higher level of cycle parking in line with emerging standards in FALP.

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