

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

Neil McDonald
Camden Council
Town Hall
Argyle Street
LONDON WC1H 8ND

Our ref: D&P/3417/01
Your ref: 2014/4381/P
Date: 6 August 2014

Dear Mr. McDonald,

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

102 Camley Street, London NW1 0PF
Local Planning Authority Reference: 2014/4381/P

I refer to the copy of the above planning application, which was received from you on 4 July 2014. On 6 August 2014 the Mayor considered a report on this proposal, reference D&P/3417/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor broadly supports the scheme in strategic terms and commends the design and public realm proposals, especially the provision of pedestrian and cycle access to Regent's Canal towpath. In order to ensure full compliance with the London Plan however, the issues set out in paragraph 73 of this report should be addressed before the scheme is referred back to the Mayor at stage two.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Mark Day, e-mail mark.day@tfl.gov.uk, telephone 020 3054 7025.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Wilson', with a stylized, cursive script.

Colin Wilson

Senior Manager– Development & Projects

cc Assembly Member, Andrew Dismore, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL

102 Camley Street, London, NW1 0PF

in the London Borough of Camden

planning application no. 2014/4381/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 on the site, and redevelopment to provide a mixed use development in a building ranging from eight to twelve storeys comprising 1,620 sq.m of employment floorspace (Class B1), 154 residential units, provision of a cycle ramp connecting Camley Street to the Regent's Canal towpath, public realm works and all other enabling works.

The applicant

The applicant is **Regent Renewal Ltd** and the architect is **Glenn Howells 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 affordable workspaces for SME's and start-up businesses is welcomed. The **design** and **public realm** improvements including a new link to the Regent's Canal towpath 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 73 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 1A: *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*

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

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

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. However the distance to platforms as measured by the PTAL calculator indicates that only St Pancras domestic rail services fall within the 12 minute walk threshold giving a PTAL of 3. The transport consultants have estimated that recent access improvements have reduced this distance and would bring the full range of national and international rail services as well as London Underground services on the Victoria, Northern, Piccadilly, Circle, Metropolitan and Hammersmith & City lines within range. Calculated on this basis, 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 29 May 2014 for the site at 101 Camley Street to discuss a mixed use scheme comprising 128 residential units and 1,580 sq.m of commercial/employment floorspace. A follow-up pre-application meeting was held on 27 June 2014 to discuss the design development for that scheme and a follow-up advice report was issued on 14 July 2014. A pre-application meeting was also held for the application site (102) on 20 May 2014 and an advice report was issued on 3 June 2014. Alongside this planning application, an application has also been submitted for the proposals at 101 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 1,620 sq.m of flexible commercial/employment floorspace on the ground and lower ground floors and 154 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 a new link from upper ground level (street level) of the site down to the Regent's Canal towpath that is currently inaccessible from Camley Street, including a cycle ramp/step free access, and public realm works to widen and improve the towpath. The building would be between eight and twelve storeys with a maximum height of 68.49 AOD.

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 occupied by a 1,008 sq.m Class B8 employment unit, which is due to become vacant when the current occupiers relocate. Although the site is surrounded by other similar type employment warehouses, neither the site nor those surrounding it are identified in the London Plan as a Strategic Industrial Location (SIL), and are not within Camden Council's locally designated Industry Area as set out in the Core Strategy. Camden as a borough however, has one of the lowest stocks of industrial and warehousing space among London boroughs, and London Plan Policy 4.4 places Camden within the restricted transfer category for the release of surplus industrial land. The Council's Development Policy DP13 also resists the loss of existing employment floorspace outside the main Industry Area, unless it can be demonstrated that continued employment use is unviable or unsuitable.

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

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 1,620 sq.m of commercial/employment floorspace (Class B1), which represents a 50% 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 200-300 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, particularly those emerging from the incubator at 103 Camley Street. The documents also confirm that unit sizes will range from 500 sq.ft up to 3,600 sq.ft and include the ability to combine or sub-divide units to provide larger or smaller studio units as necessary, to support start-up businesses and SME's, particularly in connection with the incubator at 103 Camley Street. 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 154 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)	3	0	0	3
One bed(1B2P)	39	6	7	52
Two bed (2B3P/2B/4P)	45	5	9	59
Three bed (3B5P/3B6P)	30	8	0	38
Four bed (4B5P/4B6P)	0	2	0	2
TOTAL	117	21	16	154

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 developments 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% NSA floor area is on the edge of being viable, with the toolkit showing a circa £1.7 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 26%, with 27% of the affordable units being suitable for families including the two four bedroom units, 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 residential component of the building will contain two cores. The affordable rent units will be within the northern-most part of the building on levels one to three serviced by one core. The market sale and shared ownership units will be contained in the southern part of the building, and then spread across the remainder of the building on the upper floors. Given the relatively small site area and the buildings 'L' shaped layout, GLA officers are satisfied that the scheme has a good balance between promoting mixed and balanced communities 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. Generally the layout provides no more than eight units per core which is welcomed in order to promote a sense of ownership over one's home.

33 A 'saw-tooth' edge design has been included on the east facing elevation in order to maximise dual aspect units, which is welcomed. The scheme includes eight (5%) single aspect north facing units, which are the middle two bed units within the affordable block from the fourth through to the eighth floors. It is clear that the architect has sought to minimise these units as far as practicable, and has included dual aspect balconies to maximise light. Further mitigation is required to maximise the residential quality of these units, and the architect should ensure that daylight levels can be optimised, through for example, repositioning and enlarging the window openings and maximising floor to ceiling heights to a minimum of 2.6 metres.

34 The provision of both private and communal amenity space and publicly accessible amenity area is fully supported. A total of 1,545 sq.m of private balconies, terraces or winter gardens will be provided, 200 sq.m of roof-top amenity space and 320 sq.m of public open space (courtyard and canal end), equalling a total of 2,065 sq.m of amenity provision on-site.

Density

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

36 Whilst the applicant has not confirmed the density figure, based on a site area of 0.25 hectares and 154 units, the scheme would have a density of 616 units per hectare or 1,784 habitable rooms per hectare. This figure exceeds the range of a 'central' setting. However, the site is located on the edge of the Kings Cross opportunity area, and the London Plan makes it clear that high density development is best located in the opportunity areas. The height and massing of the development is appropriate to the context and the scheme includes a significant contribution to the public realm, with good residential quality and therefore does not display any of the characteristics of overdevelopment, so the density in this instance is acceptable in strategic terms. 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

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

38 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 46, requiring a total of 446 sq.m. of children's playspace on-site, of which about 191 sq.m. is required for the 0-5 age group (which should be on-site). As stated in paragraph 36 above, the scheme includes 200 sq.m. of roof-top amenity space and 320 sq.m. of public open space, and the design and access statement states that 50 sq.m. of playspace will be provided in each location (totalling 100 sq.m.), which is a shortfall on the requirement. The site is 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 £210,802 in the draft heads of terms to enhance playspace facilities at St. Pancras Gardens. Given the proximity of the site to these local facilities, in this instance the under-provision of on-site playspace is acceptable in strategic terms. 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

39 The provision of public open space on a spatially restricted site is welcomed. This will contribute positively to the new public realm being created at the other gateway sites at 101 and 103 Camley Street, which together will form a new sequence of public spaces alongside the emerging pedestrian route to the canal towpath. Whilst not physically connected to this site, the proposal for a new bridge across the canal connecting 101 and 103 Camley Street is a fundamental route that determines the success of this cluster of gateway sites, and provides a meaningful connection of all of the pockets of public realm proposed across these sites and onto the towpath. The draft heads of terms includes a contribution of up to £200,000 towards the new bridge and the Council should ensure that this is secured.

40 A north-south public route is proposed which provides potential to connect to future development sites to the north, and this is supported. The route will be well activated by entrances to commercial units, residential cores and the proposed green space. As requested at pre-application stage, the commercial unit at the north-west corner has a high degree of transparency with glazing maximised to create views through the building on the approach from the south, in order to optimise legibility and encourage pedestrian movement along the link. The architect has also looked at an "after dusk" lighting strategy to ensure the link is well-lit and legible, and details of this should be secured by condition.

41 At pre-application stage, GLA officers raised concern over the location of the entrance to the affordable rent units on the north elevation as it is isolated from the public realm and will also act as a service route reducing its quality as a pedestrian route. Whilst it was recognised that with future development potential of the sites to the north, this entrance would be less isolated, in the interim, officers advised the architect to relocate the entrance to be accessed off the north-south link. Whilst the entrance has not been relocated, a second entrance within the north-south link has been provided, giving residents of those units a choice of how to access their home. This approach also ensures that a degree of activity is retained on the north elevation for when the sites to the north come forward for redevelopment.

42 The widening of the towpath along the southern edge of the building is welcomed in principle and responds to the Blue Ribbon Network objectives of London Plan policy 7.24, which seeks to prioritise London's waterspaces and land alongside it for a range of purposes including recreation. The design and access statement details how the canal frontage will form a strong spatial relationship with the towpath and contribute to the emerging sequence of public open spaces. Glazing on the southern-most commercial unit at lower ground and upper ground floor has been maximised, and the public realm strategy includes a dwell space in front of where the building meets the towpath, which is supported.

43 Further work on the detail of the cycle ramp has been carried out, and a kink in the route has been included in order to slow cycle traffic as it meets the towpath to avoid conflict with pedestrian. A landscaping strip is also provided between the ramp and the pedestrian steps to separate the two routes.

Form, height and architecture

44 The design of the building responds to that of nos. 101 and 103 in order to form a refined and well-considered overall massing composition. The form and massing strategy is therefore supported and raises no strategic issues. The 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 height of the building at G+11 storeys is therefore acceptable in strategic terms.

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

Inclusive design

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

47 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.

48 Stepped access is proposed from street level to the canal towpath level, with an adjacent ramped route for cyclists. Due to the significant change in level it is understood that the ramp will not be able to accommodate suitable gradients in accordance with British Standard 8300:2009 +A1:2010. The adjacent developments at 101 and 103 Camley Street include platform lifts

providing public access to the towpath and as such lift access within this site is not required. The applicant has also proposed a strategy for natural wayfinding and step-free access routes between the cluster of sites in Camley Street and the towpath.

Parking

49 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. Two blue badge car parking spaces for residents of the wheelchair accessible units have been provided, although in order for there to be one space per wheelchair accessible unit, a total of 15 spaces would be required. 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.

50 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

51 The design and access statement demonstrates that all residential units have been designed to the Lifetime Homes standard and that 16 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

52 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 mitigation and adaptation

Energy Strategy

53 The applicant has broadly followed the energy hierarchy and is proposing to reduce carbon emissions by 42%. In total, 4% savings will be achieved 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, and mechanical ventilation with heat recovery. The demand for cooling will be minimised through reduced glazing ratio, solar control glazing and openable windows.

54 In terms of district heating, the applicant has identified that there are three district heating connection opportunities within the vicinity of the development - Kings Cross, Euston Road, and Phoenix Court. Evidence of correspondence with the network developer has been

provided, confirming that none of these networks are expected to extend in the direction of the proposed development in the near future. Based on the information provided it is accepted that immediate connection to district heating is unlikely to be possible; it is however recommended that the applicant pursues the Phoenix Court opportunity further with the Borough as the design progresses. A commitment to ensuring that the development is designed to allow future connection to any district heating network, should it become available has been provided 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).

55 The applicant is proposing to install a 150 kWe gas fired CHP unit as the lead heat source for the site heat network, sized to provide the domestic hot water load, as well as a proportion of the space heating. This would contribute a 38% reduction in regulated carbon dioxide emissions. All electricity generated on site would be for landlord uses. Confirmation of the predicted electricity from the engine and the proposed running hours for the system should be provided, as the installed capacity appears high relative to the carbon savings claimed.

56 In terms of renewable energy, between 75 and 100 sq.m. of solar photovoltaic panels are proposed for the roof of the buildings, together with heat pumps to provide cooling to the commercial units and potentially the penthouses. These would provide 2% savings in regulated carbon dioxide emissions.

57 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

58 The applicant has submitted relevant Code for Sustainable Homes and BREEAM pre-assessments. It is intended that all homes meet Code for Sustainable Homes Level 4 and 'Excellent' for the commercial units.

59 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. High efficiency lighting, water efficient appliances, and water metering are proposed, together with rainwater harvesting, green roofs and attenuation cells for SUDS and biodiversity values.

60 As noted above, the scheme seeks to address Blue Ribbon Network policy 7.24 through the proposed widening of the towpath and new ramp link. These measures are welcomed and should be secured by way of condition. 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

61 The development is intended to be car free, with the exception of two blue badge spaces which are located within a designated area at the north-east corner of the site. Although the provision of two spaces is below the Lifetime Homes recommended standard of 10% of all units, on-street parking in residents' bays is available to blue badge holders to the north of the site on Camley Street, although the applicant should still confirm how the needs of wheelchair user will be met, as detailed in paragraph 51. The use of on-site spaces will need to be kept under review to

ensure that they are allocated to those in most need. The applicant is willing to enter into a permit free agreement which will prevent other occupiers from applying for a permit to park on street. This approach is supported in accordance with London Plan policy 6.13.

Trip generation

62 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

63 A total of 253 secure cycle parking spaces are proposed to serve the residential development, and 16 spaces to serve the commercial development. Although this meets the adopted London Plan requirements it is lower than emerging standards in the FALP, which would lead to a total requirement of 309 spaces to serve the residential development (2 spaces for all units above 45 sq.m and 4 spaces for visitors) and 18 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. TfL encourage the applicant to consider a higher level of provision to reflect the emerging standards in FALP.

Walking and cycling infrastructure

64 TfL strongly supports the proposed cycle ramp and steps coming forward as part of this development along the west of the site between Camley Street and the Regent's Canal towpath, as part of the other improved pedestrian links that have been put forward as part of development proposals for 103 and 101 Camley Street. A proportionate financial contribution should be made by this development towards the cost of the bridge over the canal connecting 101 and 103 Camley Street. It is important that the detailed design of the ramp, which will be agreed through a planning condition, facilitates cycle movements without having an adverse impact on pedestrians.

65 The nearest cycle hire docking stations are located 700 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 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 101, Camley Street to cover the costs of a new docking station within the area.

Travel plan

66 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

67 A construction management plan will be prepared and secured through a section 106 agreement. This should follow TfL's guidance on preparing and implementing such a plan, available

at the following link: <http://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans#on-this-page-1>

68 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

69 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

70 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

71 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

72 There are no financial considerations at this stage.

Conclusion

73 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 link to the canal towpath and other public spaces on the 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 42% carbon dioxide savings are expected, which is strongly supported although 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. The section 106 agreement should secure the travel plan, delivery and servicing plan and construction management plan. As well as providing the cycle ramp, a financial contribution towards a cycle hire docking station and the bridge proposals as part of development of 101 Camley Street 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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