

Pre-application meeting report



Agent name and address:

Kieron Gregson
Planner
Carter Jonas LLP
1 Chapel Place
London
W1G 0BG

Site address:

Bangor Wharf,
Georgiana Street,
London,
NW1 0QS

Meeting date:

Tuesday 10th June 2014

Case Ref:

2014/3255/PRE

Proposal(s)

Pre application advice/meeting on redevelopment of site from depot (Class B8) to part 4, 5 and 6 storey building comprising 34 residential units (23 market units – 21x2 bed and 2x3 bed – and 11 affordable units – 4x2 and 7x3 bed units), 7 Class B1 business units and a Class A3 restaurant.

Lead officer for Camden:

Jonathan Markwell – Principal Planning Officer

Other Camden officers attending:

Kevin Fisher (Principal Planner - Urban Design)
Peter Kelly (Senior Planner - Urban Design)
Nicola Tulley (Planning Officer – Planning Policy)
Haniza Hussain (Affordable Housing Development Co-ordinator)

Input provided in advance of the meeting, without attending the actual meeting:

Steve Cardno (Principal Transport Planner)
Genny Fernandes (Business Opportunities Manager)
Tom Little (Tree Officer)

Applicant(s)/Agents(s) attending:

Nick Taylor – Carter Jonas;
Kieron Gregson – Carter Jonas;
Peter Warren - Robson Warren Architects;
Andrew Kennard - Canal Securities Limited; and
Lucy Finkelshtein - Canal Securities Limited.

Principal issues discussed at our meeting

Introduction / Purpose of Meeting

Pre application advice/meeting on redevelopment of site from depot (Class B8) to part 4, 5 and 6 storey building comprising 34 residential units (23 market units – 21x2 bed and 2x3 bed – and 11 affordable units – 4x2 and 7x3 bed units), 7 Class B1 business units and a Class A3 restaurant.

As you are aware, the site is identified within the [Site Allocation DPD](#).

Site constraints comprise:

- Controlled Parking Zone (parking stress is above 1 vehicle for every 1 space)
- Public Transport Accessibility Level 6a
- Hydrogeological constraint area – slope stability and ground water flow (2 of the 3 areas)
- Regent's Canal Conservation Area
- Adjacent to Regent's Canal – designated as a Public Open Space and a metropolitan Site of Nature Conservation by English Nature and as a Green Chain
- Notable tree on the site
- St Pancras & Somers Town ward
- Within the 200m HS2 safeguarding area

Overview of advice

Officers see this meeting as the first in a series of pre-application meetings concerning a future development at the site. In general terms it is acknowledged that serious attempts have been made for the proposed development to follow the principles detailed in the Site Allocations DPD guidance.

There are considered to be a number of areas which will require refinement prior to any scheme being in a position to be ready for submission. Matters include:

- Justification for the removed/proposed employment floorsapce.
- Amount of affordable housing / mix of both private and affordable units.
- Appropriateness of a Class A3 use at the site.
- Overshadowing impact on the canal
- Minimising single aspect units.
- Design approach – would a courtyard approach be more appropriate and reduce the overshadowing impact?
- Activating the Georgiana Street frontage sufficiently.
- Impact on the existing tree on site
- Ensuring that any proposal contributes positively to the biodiversity and green nature of the canal setting

In this regard it is advised that a series of further meetings, ideally structured through a pre-application PPA, should be undertaken prior to any submission.

<p>Land use principles</p>	<p>The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents) as adopted on 8th November 2010, the London Plan (July 2011) and the NPPF (March 2012).</p> <p>The LDF is available to view and download from the Council's website.</p> <p>The LDF is accompanied by the Camden Planning Guidance (CPG). A full copy of CPG 2011 / 2013 (CPG1-5 was updated on 4 September 2013) is available to view from the Council's website.</p> <p>The starting point for any proposal of this nature is justification for the loss of the existing uses at the site. At present the existing use at the site was seen, after a site visit undertaken on 4th June 2014, to comprise an office and related facilities for EDF Energy. It was seen that the offices were in active use. You explained that it was the intention of the occupier to move from the site and staff would be amalgamated into other EDF Energy sites elsewhere. The proposals incorporate the provision of 7 business studios, which you detail, will provide “flexible and affordable workspace, suitable for a range of employment uses such as creative industries and small and medium enterprises”.</p> <p>With the above in mind, my colleagues in Economic Development generally welcome the redevelopment proposals with replacement employment floorspace being provided.</p> <p>In any future submission, a clear narrative as to the size and quality of the existing employment space should be provided. In addition, statement(s) from the current occupier should be provided, explaining their reasons for moving away from the site and what employment implications this has for existing staff.</p> <p>This will then be considered within the context of the proposed employment floorspace sought to be created. In particular, officers will be keen to see details of the features included within the proposed spaces, to ensure as many as possible from CPG5 are provided. With this in mind, you may wish to explore replacing or reducing the Class A3 element with additional Class B1 employment floorspace instead, as canal fronting business space may be attractive for future occupiers. As such, a full qualitative and quantitative assessment should be provided with any application, within the context of the factors outlined by Policies CS8 and DP13, and supplemented by CPG5 Ch7.</p> <p>The policy details that, for mixed use developments such as that sought, the employment floorspace should be maintained or increased. It is advised that this should be your starting point for incorporating replacement employment floorspace on site. It is however acknowledged at this juncture that such an amount may be difficult to achieve. It is considered that officers may be willing to consider a partial replacement of the employment floorspace on the site, providing it is of a suitable standard (taking into account a comparison of the existing and proposed – as detailed above) and the scheme delivers other tangible planning benefits in accordance with other policies (such as, for example, on-site affordable housing,</p>
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comprehensive employment, training and local procurement obligations). This can be explored further in future pre-application discussions.

More specifically in terms of the proposed spaces, a key element for officers is ensuring that the proposed spaces are suitably attractive to make it genuine mixed use redevelopment. Officers would wish to guard against the space being left empty and therefore would welcome any commentary or agreements already in place when an application is made about the future take up of this space.

My Economic Development colleagues would also welcome and encourage discussions about securing a proportion of the units for specific SMEs in the borough. An alternative approach would be for you to could consider workspace for start-ups. These are essentially desk spaces, with a small number of units for the start-up companies which expand – to move on to larger premises at the site or elsewhere in the Borough. The start-up space could focus on the growth sectors my colleagues in Economic Development currently work with in the area.

Residential policies	<p><u>Principle</u></p> <p>Housing is the priority land use of the LDF (DP2, CS6 & CPG2). This would only be applicable should the land use principle matters outlined above be satisfied in full. Hence, if this is satisfied, housing at the application site would be welcomed in principle.</p> <p><u>Affordable housing</u></p> <p>Moving on to more general affordable housing matters, given the floorspace specified as being 3,761sqm, the affordable housing target for the site would be 38% of the floorspace (using the sliding scale and rounding up the % target based on the proposed floorspace, which exceeds the number of units – 34 – proposed). Officers would therefore expect 38% (1429.3sqm) of the on-site residential accommodation proposed to be affordable housing, based on the current proposals. This would be to provide a policy compliant scheme (CS6 and DP3). The strong policy expectation is for on-site affordable housing, with these ideally comprising social rent units. The current proposals, detailing a 34% provision, is therefore below the provision required to align with a fully compliant scheme.</p> <p>It is acknowledged that the affordable housing targets were set when more generous grant levels were available under the Government's National Affordable Housing Programme 2008-11. It may not be possible to meet this target under the current grant regime.</p> <p>However, to reaffirm, affordable housing should be provided on-site wherever possible. Criteria in DP3 and supporting text indicate how the Council will consider whether an off-site contribution may be appropriate. Where an off-site contribution is appropriate, the Council will seek provision on an identified site. As indicated in paragraph 3.16, the proportion of affordable housing will be considered across both sites. Following from the affordable housing target, the aim would be for the floorspace of off-site affordable housing to match the floorspace of the on-site market housing.</p> <p>Recent experience suggests that it is very difficult in the current market for Registered Providers or other developers to acquire sites for viable development of affordable housing. Consequently, proposals to bring forward affordable housing on an unidentified site or sites are unlikely to be deliverable, and the Council is likely to resist them. The Council owns a number of sites that could be suitable for development of affordable housing, and use of these sites should be explored if an off-site contribution is considered to be appropriate.</p> <p>Any payments to the Council to secure direct provision of affordable housing on a specified site would need to reflect the actual cost of provision rather than the payment-in-lieu formula set out in CPG8.</p> <p>Policy DP3 indicates that affordable housing should be split as 60% social rented and 40% intermediate. This policy pre-dates the introduction of the affordable rented tenure.</p> <p>Should the subsequent proposals not seek to provide the policy compliant</p>
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amount of affordable housing on site, any shortfall would need to be justified in the fullest terms for officers to possibly consider such an approach acceptable. This would need to consider the factors detailed in DP3 / CPG2, and in particular possibly include a comprehensive viability assessment as part of the justification. As part of future pre-application discussions, should this be necessary, it is strongly advised that prior to any application submission the parameters of any viability assessment is sought to be agreed with the Council (in conjunction with independent assessors at BPS Surveyors, who would be likely to carry out the review for the Council. As funded by you). This is to assist in minimising the time to be taken in considering the application, in order to determine the application in a timely manner. Based on past experiences, if viability parameters are not agreed in advance of submission it can lead to significant delays in the determination process.

Other points to note at this initial juncture include the need to seek and detail discussions undertaken with registered providers of affordable housing. This should be undertaken with a variety of providers as the scheme developers (in line with comments above) prior to any submission. Details of all communications (and responses) with registered providers should be stated in the subsequent submission, in particular noting which providers have shown an interest in the proposed affordable units. The Council will also engage registered providers at the time of any application.

Camden's Housing Commissioning and Partnerships Team have provided details of Providers who have a development programme and have existing stock in the area

1. A2Dominion - Jonathan Sutherland Senior Project Manager
020 7569 7017 07721 892 753
jonathan.sutherland@a2dominion.co.uk
2. Circle - Iain Taylor Regional Development Director (incl London)
020 7447 3032 07977 283452 iain.taylor@circle.org.uk
3. Origin - Alice Spanton Head of Development (Origin) 020
7209 9342 07767 613 582 Alice.Spanton@originhousing.org.uk
4. One Housing - Alan Williams Group Development
Director 020 7428 4212 awilliams@onehousinggroup.co.uk
5. Newlon - Caroline Pennock Business Development Director
0207 613 6883 07930 386 786
caroline.pennock@newlon.org.uk

Social rented / affordable rented housing

Following the London Plan Early Alterations (REMA), the 60% element of rented affordable housing combines social rented and affordable rented housing. CPG2 sets out the mix of affordable dwelling sizes sought in Camden. Camden expects 50% of social/ affordable rent housing to have 3-or-more bedrooms. No more than 20% should be 1-bedroom homes, and 30% should be 2-bedroom homes.

Camden does not have adopted guidance on affordable rented homes due to the GLA's London Plan Early Alterations (REMA), which seek to restrict the ability of boroughs to influence rents. However, indications of Camden's preferred approach are given in Camden Planning Guidance 2 – Housing – Appendix (i) – particularly pages 81 and 83. A broadly similar approach is also set out in the Mayor's Housing SPG (Nov 2012) at paras 4.2.16, 4.2.17 and 4.2.38.

Given the very high market rents in Camden, Camden's position is that family housing (3-or-more bedrooms) should be provided at levels close to target social rents, and that 1- and 2- bedroom homes may be provided at higher affordable rents.

The GLA has indicated its intention to introduce a new capped rent based on 50% of market rents (lower quartile market rents in high value areas) from 2015. You are advised to contact Camden's Housing Commissioning and Partnerships Team (contacts given above) to discuss the appropriateness of including this product.

Intermediate housing

Camden generally seeks a mix of 1- and 2-bedroom intermediate homes, with some 3-bedroom homes where these would be affordable to households unable to access market housing.

Intermediate homes should satisfy the affordability criteria set out in the 2011 London Plan and subsequent Annual Monitoring Reports (AMR). The most recent AMR (2011-12) indicates that intermediate housing should be affordable at a household income not exceeding £66,000 (1- or 2-bedroom homes), increased to £80,000 for families accessing family sized (3 bed or more) accommodation. Please note that the above is subject to regular change, with the publication of updated AMR. You are advised to consider the latest AMR in due course.

Camden also operates its own income household income targets for intermediate shared ownership homes, as set out in the Camden Planning Guidance 2 – Housing. These are £30,000 for a 1-bedroom home and £40,000 for a 2-bedroom home.

Market values in Camden generally severely limit the affordability of shared ownership housing. Shared ownership is exceedingly unlikely to meet Camden's income targets, and may well fail against the Mayor's affordability criteria. Therefore, you are encouraged to test affordability of any shared ownership proposals at an early stage. Where shared ownership will not meet the affordability criteria, you should consider alternative products (e.g. intermediate rent), or consider augmenting the offer of social/ affordable rented housing instead of providing intermediate housing.

Specific layout comments from Haniza Hussain, Housing Partnerships

A number of shortfalls with the layout were discussed at the meeting, most notably:

- All affordable units are single aspect;
- The 3-bed affordable units do not have separate kitchens and separate WC.
- 5 out of the 7 3-bed units are below the GFA required under the London Housing Design Guide. It would be expected for these units to be at least 102m².
- Communal corridors do not have any natural light - this can be a safety and security issue.
- No wheelchair units within the affordable element have been identified. The Council would be looking for 1no. affordable wheelchair unit with parking on this scheme based on the 10% policy requirement.
- You are to further consider the need for the internal door linking the affordable and private accommodation proposed. For management purposes, it may prove to be preferable for this door to be removed, so as to provide a complete separate core for affordable units.
- You will advise in due course if the size of the residential refuse store is adequate to serve all 34 units.
- At this point in time no specific tenure split has been identified. Nor has a management strategy for the scheme been developed, in particular estimates of service charges.
- Security - security measures will need to be compliant to Secured by Design standards

These should be considered as your proposals move forward.

Mix of market housing

In terms of the mix in size of residential units, policy DP5 seeks to provide a range of unit sizes to meet demand across the borough. In order to define what kind of mix should be provided within residential schemes, policy DP5 includes a Dwelling Size Priority Table (small units are described as studio, 1 & 2-bed, with large units being 3+bed units). The Council would expect a scheme of this size to meet the priorities outlined in the table in full. At the present point in time the mix of market units (21 x 2 bed and 2 x 3 bed) is heavily dominated by small units. Although the policy target of 40% 2-bed units is met in itself, it is advised there is a significant shortfall in the number of large units (8.7% proposed at present). Such a mix would not be consistent with the creation of mixed and inclusive communities (CS6). You are therefore sought to further consider the mix, and seek to provide a far greater amount of large (3 and 4 bed) units within the scheme, to assist in the creation of mixed and inclusive communities. The present mix would not be supported by officers.

<p>Food and drink policies (for Use Classes A3, A4 and A5 proposals)</p>	<p>The proposals indicate a 350sqm restaurant is proposed at ground floor level fronting onto the canal.</p> <p>The application site is not located within a designated town, district or neighbourhood centre, but policy CS7 does provide for the limited provision of small shops outside centres to meet local needs. Policy DP12 goes into more detail, while DP10 details retail units of around 100 sqm, with a preference for independent occupiers.</p> <p>With the above in mind, officers (in discussions with senior officers <u>subsequent</u> to our meeting) question whether a Class A3 use would be appropriate in this location, especially bearing in mind it would be a fairly isolated location (within the context of the canal as a whole)? In addition, other parts of the canal are coming forward with significant additional floorspace of this nature (for example nearby at Hawley Wharf), which may limit the attractiveness/appropriateness of the space at this point).</p> <p>Put another way, is Class A3 actually required here? There is a clearly identified need for employment and residential floorspace detailed in site allocations document, whereas Class A3 is not explicitly referred to. Should more canal side space instead be proposed for employment (Class B1) space instead, as alluded to in the land use section above?</p> <p>Should you continue to seek to introduce Class A3 at this part of the site, it is presently queried the precise intended use of a single unit totalling 350sqm and how this would co-exist satisfactorily with existing and proposed surrounding uses? Therefore in any future submission it would need to be clarified and confirmed what the proposed uses are (i.e. which use class they fall into – solely Class A3?), the exact number of separate units proposed (with the guidance above regarding units of around 100sqm in mind) and how such uses comply with policies CS7, DP10 (if appropriate), DP12 and CPG5 in particular. In particular, the factors at DP12A – O should all be considered in full, with detailed commentary and plans (where appropriate) provided. In particular, the servicing of the unit(s) and relationship with residential above would need to be carefully outlined. This would then allow officers to take a view on the appropriateness, or otherwise, of this element of the proposals. In particular amenity concerns could justifiably be made if a single Class A3 unit is proposed and thus explicit commentary would be required to support any proposal of this nature.</p>
<p>Amenity</p>	<p><u>Future occupiers</u> (to be read in conjunction with residential policies / transport / access sections)</p> <p>Naturally all residential units would need to be built to the highest possible standards, with each unit being sufficiently sized (according with London Plan standards) and suitably designed internally (in line with CPG2 Ch4) to provide a high quality of accommodation for future occupiers. This would however need to be weighed up against the competing demand of protecting existing nearby amenity. Any proposals should be complemented with commentary detailing how the CPG2 Ch4 standards are met (and where they are not met, commentary explaining shortfalls should be detailed). Reference should also be made to London Plan 2011 Policy 3.5/ Table 3.3 and the Mayor's Housing SPG (Nov 2012).</p>

Based on the basic floor plans submitted, it would appear that the majority of the proposed units will be single aspect. Such a layout is not desirable in terms of providing the highest quality residential accommodation possible at sites of this size / nature. As detailed in the design section, an alternative design approach which allows a central courtyard layout (e.g. perimeter block) would enable dual aspect units to be provided on site.

It would appear that significant attempts have been made, with the layouts shown, concerning possible instances of overlooking between residential units, from rooms and/or external balconies / terraces. In this instance the layout of each individual unit would need to be carefully designed to minimise such instances. In terms of the balconies, the provision of privacy screens should be minimised where possible, owing to the visual amenity harm that they often cause (especially at highly visible elevations, such as the canal frontage).

Neighbouring / nearby occupiers

Overlooking / privacy

Minimising overlooking to existing nearby occupiers will be a challenge in any proposal at this location, owing to the acknowledged existing urban grain context. In particular the mitigation measures and distances towards existing residents within all nearby dwellings will need to be demonstrated in full in any submission. Detailed commentary / diagrams / details of mitigation measures will be required prior to officers being satisfied with this element of the proposals. CPG6 details that a distance of 18m is generally required; this should be followed in any proposal at the site, with any shortfalls identified and explained. The proposed scheme appears to have been developed with this in mind, with the footprint of the proposed building set away from the Royal College Street buildings. However, it is noted that the existing footprint of structures is close to these buildings, and any proposal which doesn't worsen the existing context is unlikely to raise overlooking / privacy concerns.

Outlook / sense of enclosure

Similar to the overlooking / privacy comments above, ensuring that the outlook of nearby occupiers is maintained and will not lead to an increased sense of enclosure or overshadowing, this is likely to be considered appropriate. A variety of written commentary and visual information will need to be submitted at the time of any application for officers to consider this matter further.

Daylight / sunlight

Detailed daylight and sunlight assessments will need to be advanced prior to any submission. The application site is surrounded by largely residential properties, all of which will need to be thoroughly tested to ensure that the proposed development would not lead to significant losses of daylight and sunlight to these existing occupiers.

For any application a full daylight and sunlight assessment (following in full the BRE guidelines) would need to be submitted. This should consider a) the impact of the development on nearby buildings – methodology should be detailed as to why some buildings have / have not been tested; b) that the proposed residential units have access to sufficient daylight/sunlight; c) shading impact assessment to demonstrate that any areas of public open space receive sufficient hours of sunlight at appropriate times of the year. Full methodology details, detailing every window tested, should be submitted with any application.

Noise and disturbance

The 'play area' shown on the floor plans submitted is considered to be excessive in size and be likely to have the potential to cause significant noise and disturbance to future and existing nearby occupiers. As such the area should be reduced in size (and replaced with green roof areas) to limit these to more appropriate spaces, such as at ground floor level. The provision of rooftop play space also raises significant safety concerns and would need to be carefully managed and designed if this were to continue to be sought.

If any external plant is proposed (such as for the Class A3 unit or associated with the other uses) this would need to be supported by a full acoustic report (to show compliance with the Council's Environmental Health Noise standards) and detailed drawings (elevations and floorplans) to denote the exact extent of such plant. Any acoustic report would need to contain the following information:- (i) background noise levels at present (ii) manufacturers' details and noise output from proposed plant (iii) whether proposed plant would comply with Camden's noise standards in relation to nearest noise sensitive facades (5-10db below background levels) e.g. residential properties including a spreadsheet calculation of noise prediction that demonstrates theoretically that Camden's planning conditions will be met (iv) any means of attenuation or isolation necessary to ensure that the proposed plant complies with noise standards (e.g. acoustic screens). Please see policies DP26e (supporting text paragraphs 26.6 and 26.7), DP28 (and supporting text) and DP32 (and supporting text) and CPG6 Ch 2 and 4 for more information in respect of noise/disturbance matters.

Microclimate

The nature of the proposals, in comparison with the existing situation (including the context of existing nearby buildings) is such that it may be necessary for a wind impact assessment to be carried out. Please see DP26 (in particular paragraph 26.8) and CPG6 Ch10 (in particular paragraphs 10.7 – 10.13).

Waste and recycling / general servicing

The plans detail waste and recycling areas at ground floor level, which is welcomed in principle. Details should be provided as to how these areas will be managed and how servicing will take place in practice generally. In advancing the proposals, it is advised that policy CS18 and guidance within CPG1 Ch10 is closely followed. The precise size and location of the

facilities should be indicated at application stage, in order to avoid such details being required to be secured via condition.

Overshadowing to the canal

The potential overshadowing to the canal is acknowledged in your submission to be a key consideration in any future proposal at the site. The overshadowing study already completed itself demonstrates that there will be an adverse impact on overshadowing to the canal. This is inevitable with the type and nature of development sought to be implemented at the site.

Officers are mindful of the future increase in use of the canal, with future developments coming forward and the subsequent likely increase in active use of canal related activities. With this in mind officers would not wish for the existing situation to be significantly worsened, as if this were to worsen it would negatively impact on the amenity and ambience of the canal setting. As policies CS15Q-U detail, the Council will seek to preserve and enhance the canal. As detailed in the design section below, an alternative courtyard footprint proposal may come forward, which would enable you to increase the height of development in other parts of the site, and thereby reduce it adjacent to the canal. This in turn is likely to improve the overshadowing results presently seen in the report presented for consideration. It is therefore considered that alternative design approaches to the site could improve the overshadowing impact to that seen with the present proposals. Officers would have concerns with the proposals as they stand in this regard (given the visual impacts seen in the report to date at various times of the day and year) and therefore seek for you to revise the proposals accordingly.

Conservation and urban design / Listed buildings

Owing to the early stage of the design process that the proposals are currently at, this response details only overarching principle matters. It is considered that more detailed matters should be discussed in more detail in subsequent pre-application meetings.

The siting, layout and form appears to have derived from rights to light envelopes. There are a number of issues which require further investigation to address guidance set out in the site allocations document.

The height of the proposals are considered to be broadly within the appropriate parameters. However, prior to this being able to be confirmed as appropriate, it is considered that there is significant potential for a courtyard footprint of development, to activate Georgiana Street (as per site allocations guidance) to be advanced in more detail. This would in-turn reduce overshadowing on the canal (detailed in the previous section), which should be avoided as officers would not want to lose the amenity of the canal.

In addition, the degree and legibility of public access to the canal site is currently limited. Therefore, does the configuration of the building layout and uses facilitate maximum public use of the canal frontage? Further consideration is required around the relation of the layout and built form in relation to the Georgiana St frontage to maximise active frontage on this edge.

Also further consideration is required on the potential of opening up of the canal dock adjacent to Eagle Wharf along with the owners of the neighbouring building. There may be benefits for both site owners in this and therefore should be explored.

As already detailed in the amenity section, there are a high proportion of single aspect flats in the residential component of the building which need to be reconsidered. The number of single aspect flats needs to be reduced to a minimum.

Furthermore, the canted orientation of windows on the canal frontage produces a length of what is essentially a blank frontage onto the canal when approaching from the north of the site. Surveillance of the canal towpath should be maximised along the canal edge (as per the site allocations document).

Entrances to the building should be clearly visible and provide a positive experience for the building occupants. The affordable accommodation entrance is considered to be particularly problematic in this respect, as it is hidden at the back of the site and situated beneath a deep overhang of the first floor flat. Currently there is no distinction with between the employment floor space and residential components of the building at the rear. Clear access to the proposed Class A3 would also be required.

	<p>Use of the existing setts on the site should be maximised in the design of any courtyard space. The floor scape should be unified in design. Where possible and appropriate opportunities should be taken for planting/greening on the site and enhancing the nature conservation value of the existing planting in Eagle Wharf.</p>
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Archaeology and historic parks and gardens	<p>The site is not located within an archaeological priority area.</p>
Trees and landscape / Parks and open spaces	<p>The site currently includes a tree in the corner of the site, which provides a degree of visual amenity from St Pancras Way. It is shown on the proposed plans that this would be sought to be removed.</p> <p>It is considered that should this tree continue to be sought to be removed, this would need to be justified via a full arboricultural report, which would need to be submitted with any future application to justify the loss of this tree at the site. The report would also need to consider other nearby trees which may be impacted by the development. The existing tree has not been formally assessed on site in detail by a tree officer as part of this pre-application response, so it is presently unclear as to whether officers would insist on existing trees being retained or not. As such, it is advised that an assessment is undertaken for consideration as soon as possible in any future pre-application discussions, as this may considerably influence the overall design approach. Usually, an existing tree is proposed to be removed, and this is shown to be justified, it would normally be expected to be replaced on site with similar specimens.</p> <p>In addition, any development would need to demonstrate that it would not harm any remaining trees (if applicable), either during construction (which follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction") or in the long term (e.g. development would need to be positioned outside of the root protection area of the tree).</p> <p>The detailed open space / landscaping strategy would need to be developed during further detailed pre-application discussions. It is considered that appropriate usable areas of open space should be incorporated on site, for future occupier and/or public use. It is questioned whether the roofspace creates appropriate play/open space owing to safety and possible noise/disturbance concerns.</p> <p>The provision of green/brown roofs should be incorporated wherever practical (such as at various flat roof levels), in line with policy DP22. Please see a note attached on living roofs for consideration. If full details are provided at application stage, this will avoid the need for the following likely condition being added:</p> <p><i>Prior to the first occupation of any of the new residential units a plan showing details of the green roof including species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. The green roof shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme of maintenance.</i></p> <p>Bird and bat boxes and other biodiversity measures should also be integrated into the design. Examples of such measures are given below (maybe in German but there is a tab on the website to convert to English!):</p>

[Sparrows](#) [Swifts](#) [Bats](#)

The Parks and Open Space team also incorporates Nature Conservation officers. It is considered imperative that any proposal contribute to the biodiversity and green nature of the canal setting (as per the site allocations guidance). It is considered that the proposed space fronting the canal would not achieve this, with the plans instead indicating that a proportion of greening would be removed. It was seen during the site visit that cootes were nesting in this area and therefore an ecological survey should be carried out and submitted as part of any future proposal. In addition, the opposite side of the canal is protected open space, as is the canal itself.

<p>Crime prevention</p>	<p>You are advised to engage Crime Prevention Design Advisor Adam Lindsay (Adam.Lindsay@met.pnn.police.uk) in advance of any submission. This is in order to assist in incorporating crime prevention measures, and working towards secure by design accreditation.</p>
<p>Access</p>	<p>All dwellings should accord with lifetime homes standards (DP6 / CS6 / CPG2 Ch5). A lifetime homes assessment should be submitted with any application detailing where standards are met. Commentary and evidence on the plans (dimensions and distances for example should be provided).</p> <p>There is a requirement for 10% of the residential units, <u>across all tenures</u>, to be suitable for wheelchair users. The unit(s) for the affordable housing provision should be fully fitted out to the Camden Wheelchair Housing Design brief (attached); while the required number of market units should be designed to be adaptable for future wheelchair use.</p> <p>Linked to access matters, the Council's Building Control service now set their own fees, which means if/when planning permission is granted and you are required to advance the proposals from a Building Control perspective, the Council's team are now much more competitively positioned than previously. For example, the Council are able to offer bespoke fees for each individual case, based on the length of contract and complexity of work. It is understood that the Council's new fees come in at less than 1% of the contract value. If you wish to discuss Building Control matters further please contact my colleague Albert Grant on 020 7974 2396 or albert.grant@camden.gov.uk</p>

<p>Resources and energy</p>	<p>A sustainability strategy would need to be submitted with the application, in line with primarily CS13, DP22 and CPG3. Within this, a code for sustainable homes pre-assessment would be required for the residential units proposed. It would be expected for a 'level 4' rating to be secured, with the necessary water, materials and energy categories also adhered to (see CPG3). All measures would be secured through design-stage and post-construction reviews, as secured via s106. Please also note that the assessments need to be carried out by a licensed assessor (which is clearly stated within the document). The strategy would also need to incorporate a BREEAM pre-assessment should 500sqm or more of non-residential development be proposed. The BREEAM pre-assessment would be required to meet an excellent rating, with 60/60/40 of credits secured in the energy, water and materials categories. Like the CfSH assessment, the design stage and post construction reviews would be secured via s106.</p> <p>Owing to the size of the proposed development an energy statement will be a statutory requirement, with the strategy following the methodology guidance outlined in CPG3. More specifically please see policies CS13, DP22, CPG3 Ch2, 3, 4, 5, 6, 7 and 8. Please also consider the more recent London Plan policies in preparing the energy strategy. You will also note that the site allocations DPD expects development to "Provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible". This is followed up in the supporting text, detailing "This site and sites 40 and 41 below could contribute to a decentralised energy system. The sites are in close proximity to the community heating for social housing bounded by Plender Street and Camden Street, and we would expect the energy strategy for each development to test the feasibility of establishing a heat network to link with nearby Camden housing estates. Generally it would be expected that the largest site (Site 41- 24-58 Royal College Street) would house the plant with the other sites contributing to provision of the infrastructure". You are advised to bear this in mind and undertake discussions with the other nearby landowners prior to any submission.</p> <p>In addition, the Mayor's 40% CO2 reduction target will be sought. In practice, should the energy strategy be considered to satisfactorily demonstrate the required carbon dioxide reductions (in comparison with the baseline), such measures would be secured in full via the s106 legal agreement. More specifically, you are advised to explore linking the development with a decentralised energy network in the area. Also (in addition to the above context), given the close proximity of the site to the King's Cross network, such a link up should be explored. Please see figure 3 in CPG3 for more information, with commentary provided to detail how the flowchart has been followed (please also see the section on financial contributions if connection is not possible).</p>
<p>Transport and servicing</p>	<p>Comments were provided in advance of the meeting from transport planning. These initial comments, are summarised as follows:</p> <ul style="list-style-type: none"> • A transport assessment should accompany any application. The transport assessment needs to fully consider CS11, DP16-DP21, CPG6, CPG7, CPG8 and the London Plan (Chapter 6). • The site has a PTAL rating of 6a so Transport Planners will resist

any proposals for general car parking. Instead, in line with DP18, Transport Planners will seek a car free development (for all proposed uses) except for disabled parking if necessary (which would be tied to wheelchair units proposed). Please note that any disabled parking bays will also require electric vehicle charging points, in accordance with the London Plan.

- Transport Planners will assess cycle parking proposals against LBC and London Plan parking standards, and CPG7 guidance. Cycle parking will need to be covered, secure, and fully enclosed. It would also need to have step free access.
- Servicing should be accommodated within the site boundary. Depending on the final mix of uses proposed, a servicing management plan may be sought to be secured via S106 Legal Agreement.
- A PERS audit would be useful.
- Given the scale of the proposed development contributions towards pedestrian, cycle, and environmental improvements would be sought. This is in line with CPG8 paragraphs 10.11-2 and CPG7. Such contributions would be secured via s106.
- A Section 106 contribution will be required for repaving any footways around the site that would no longer be required, reinstating the footway across any redundant crossovers. It would also provide details for any new accesses proposed.
- In line with CPG7 para 3.3, TfL guidance details that Travel Plans should be submitted for any residential development over 30 units. Given the number of residential units proposed, a Travel Plan will be required to be submitted with the planning application. The future version of the plan will be secured by S106 Agreement, with a financial contribution of £5561 usually also secured for the Council to review and monitor the travel plan for up to 5 years.
- A Construction Management Plan (CMP) will be necessary, to be secured by S106 Agreement. A substantial CMP should be submitted at the application stage to help inform public consultation responses.
- Given the number of residential units proposed, it is advised that you may wish to separately engage TfL in advance of any application to ascertain any TfL requirements. If you undertake a meeting with TfL, please advise the Council so that LB Camden staff can also attend.

<p>Community development and regeneration</p>	<p>On any proposal of the nature sought full employment, training and local procurement obligations would be required, as per CPG8 Ch8. All such measures would be secured via S106 Legal Agreement. More specifically, the following measures would be likely to be sought:</p> <ul style="list-style-type: none"> - Target of 20% local recruitment during construction stage - Advertise all construction job vacancies and work placement opportunities exclusively with the Kings Cross Construction Skills Centre (KXCSC) for a period of 1 week before marketing more widely. - Deliver a minimum of x construction apprentices (1 per £3million of the build cost) over the course of the scheme, and pay the council a support fee of £1,500 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council's KXCSC. - Deliver x (to be agreed) work placement opportunities (CITB benchmark) of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Kings Cross Construction Skills Centre. - Sign up to the Camden Local Procurement Code, which includes a local supply chain target of 10%, as per section 8.19 of CPG8. In addition, organise and fund the cost of a minimum of 2 Meet the Buyer Event / Supplier Workshop/s to support local suppliers to bid for tenders. The events will be delivered in partnership with Economic Development Team. - Provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements. <p>A financial contribution towards community facilities would also be required, at a rate of £980 per bedroom, as per figure 2 at CPG8 Chapter 4. This would be secured via s106 Legal Agreement.</p>
<p>Contaminated land</p>	<p>The site allocations DPD details that "The existing use of the site as a storage depot and workshop means that there would be a need to investigate the site for contaminated land (via a preliminary assessment) prior to the submission of any planning application for redevelopment of the site". Should you wish to discuss what should be submitted, I would advise you to contact my colleague Weronika Schultz (Weronika.Schultz@camden.gov.uk 0207 974 2794), who is the Contaminated Land Officer in the Environmental Health team.</p>

<p>Basement excavation</p>	<p>Based on the information submitted for consideration, it appears very likely that some form of excavation will be required to implement the proposed scheme. Should excavation be proposed a Basement Impact Assessment (BIA) would need to be submitted with the application. This is in line with CS13, DP22, DP23 and DP27. This is backed up by CPG4 and Arup guidance for subterranean development 'Camden geological, hydrogeological and hydrological study'. Please see the website for more information.</p> <p>The application site is within two of the three hydrogeological constraint areas, which means any BIA submitted would be subject to independent review. This is as per paragraphs 2.33-4 of Camden Planning Guidance 4 2013. The independent review would need to be funded by the applicant.</p> <p>In particular, please note that the need for BIAs to be undertaken by <u>suitably qualified professionals</u>, which is paramount (see CPG4 and Arup report for details of the required qualifications). In addition all BIA information is required prior to registration of the application.</p>
<p>Other S106 matters</p>	<p>Any residential proposal involving five or more units is required to make a contribution to <u>public</u> open space. Please see policies CS15, DP31, CPG6 Ch 11 and CPG8 Ch 11. It is considered that you should explore the possibility of incorporating public open space on site, although it is acknowledged that table 1 at paragraph 31.7 of the LDF denotes the threshold to be 100 dwellings. If not provided on site a payment in lieu would be secured. This would be secured via S106 Legal Agreement.</p> <p>In line with CPG8 Ch 4 paragraph 4.5 a financial contribution towards education provision would be required for the proposed development. This would be secured via S106 Legal Agreement. Please see CPG8 Ch4 for more details.</p>
<p>Planning Performance Agreements (PPAs)</p>	<p>For your information and future reference the Council provides Planning Performance Agreements (PPAs) for larger scale planning applications of a complex or strategic nature. It is considered that the proposed scheme may benefit from advancing a PPA.</p> <p>PPAs have been identified by the Department for Communities and Local Government as an important tool for managing the end-to-end planning process and improving the quality of decision-making for the largest and most complex planning applications.</p> <p>A PPA will start as an extension to this charged pre-application advice and assistance for major development and will continue through to the determination of an application.</p> <p>There are considered to be several benefits of a PPA. First it provides a structured framework for steering a major development proposal through all the necessary stages of identifying issues, consultation and negotiation in order to arrive at a well informed decision. Entering into a PPA also leads to a more collaborative approach between the developer and local planning authority in which issues, timescales, costs and requirements such as community involvement or specialist supporting evidence are agreed at an</p>

early stage. Furthermore it provides an alternative route from the standard 13 week time-constraint that would otherwise be imposed for determining Major Applications in line with Government targets.

The Council offers two types of PPA according to the scope of issues and level of complexity to be encountered.

A “Type 1” PPA is a highly bespoke form of agreement that starts during the early stages of the pre-application process. It is suitable for schemes raising multiple issues of a highly complex or contentious nature and offers a clear framework and ‘tasks plan’ for front-loading as much of the information, negotiation and consultation as possible prior to submission of an application. These will be particularly suitable for large scale major applications likely to require an Environmental Impact Assessment and/or a high number of pre-application meetings.

A “Type 2” PPA provides a more standardised form of agreement to guide the pre-application process through to submission and determination of the planning application. It is suitable for most significant major applications but where the level of complexity is not likely to require more than one or two pre-application meetings.

Please note that a PPA does not give any guarantees as to the outcome of a planning application. It is purely to assist the project management and process of communication between the Council and the applicant and builds in added flexibility to properly address any issues or problems prior to the Council making its decision.

It is likely that this proposal would constitute a “Type 1” PPA. Should you wish to enter into a PPA please contact Jonathan Markwell for more details. Please note that the basic cost for a PPA is £6,000 and initial submissions can be made via the Council’s [website](#). In addition to the £6,000 flat rate fee, an additional fee would be charged for each individual meeting undertaken during the PPA period (in line with the standard fee for the corresponding pre-app meeting).

<p>Mayor of London CIL / Camden CIL</p>	<p>The Mayor of London CIL came into force from 1st April 2012. The proposed development would be CIL liable. As part of the application you will need to denote the sqm size of the units (both GIA and GEA). The amount charged by the Mayor CIL is £50 per sqm in LB Camden.</p> <p>In respect of the Camden CIL, please see the website for commentary on the current position. As you will see, consultation is presently taking place on the charging schedule. http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/community-infrastructure-levy.en</p>
<p>Other matters</p>	<p>DM Forum / Developers' Briefing</p> <p>The proposals would be likely to benefit from a DM forum and possibly a Developers' Briefing in advance of any submission of an application. Please see the website (bottom of this page) for more information (pages 8-9) regarding the nature of DM Forums. Regarding developers' briefings, please see this link. If you intend to pursue these options you are advised to inform the case officer to discuss this further.</p>

Planning Obligations under Section 106 of the Town and Country Planning Act 1990

Following our preliminary assessment of your proposal, if you submit a planning application which addresses outstanding issues detailed in this report satisfactorily, officers would only consider recommending the application for approval subject to completion of a Section 106 agreement covering the following head(s) of terms.

Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its compliance	Yes – see CPG8.
Affordable Housing	Yes
Public Open Space Contributions	Yes

Education Facilities and Contributions	Yes
Healthcare Facilities and Contributions	No
Car Free or Car Capped Housing	Yes
Highways works	Yes
Public Transport Improvements	Yes
Travel Plan	Yes
Service Management Plan	Possibly
Construction Management Plan	Yes
Community Safety	Unlikely
Town Centre Management	No
Sustainability Plan (including code for sustainable homes / BREEAM)	Yes
Energy Plan	Yes
Social and community facilities/community cohesion	Yes
Local employment (e.g. construction jobs recruitment, training and employment contribution)	Yes
Local procurement	Yes
Public Art	Unlikely
Phasing	Possibly – depending on nature/location/amount of affordable housing and relationship with proposed employment floorspace
Other (specify)	

Supporting Statements and other information required for a valid application

To submit a valid planning application you will need to provide all the information and plans set out in the attachment to this letter. In addition, you should submit the following statements, showing how far your proposal meets Camden's policies and guidance:

Design and Access statement (including lifetime homes and wheelchair housing assessment)	Yes
Affordable housing statement (including Viability assessment if less than the required % affordable housing is proposed)	Yes
Air Quality assessment	Possibly
Archaeological assessment	No
Contamination report	Yes
Construction Management Plan	Yes – as comprehensive as possible draft should be provided for the purposes of informing the public consultation process
Daylight/sunlight assessment	Yes (in terms of nearby occupiers / future occupiers of proposed units and impact on any on-site amenity space proposed)
Development phasing plan	Yes, if proposed over separate phases
Ecological survey	Yes
Energy/renewable energy statement	Yes
Environmental Statement/ Impact Assessment	Unlikely, based on the 0.2ha site size specified
Floorspace Schedule (including full break down of residential mix by number of bedrooms and tenure)	Yes
Light impact / overshadowing statement	Yes (on Canal)
Listed building/Conservation Area/Historic Gardens appraisal	Yes (CA commentary at a minimum)
Noise Impact assessment (e.g. Acoustic report for plant)	Yes if proposed
Photographs/photomontages	Yes
Planning Statement	Yes
Justification for demolition in CA	Yes
Noise Assessment (for externally transmitted noise e.g. from main road)	No
Public Open space assessment	Yes (within the D&AS)
Regeneration/Community facilities assessment	Yes

Retail impact assessment	No
Service Management Plan (including waste storage/removal)	Yes
Strategic views assessment	No
Sustainability Statement (including code for sustainable homes / BREEAM Pre-assessment)	Yes
Transport Statement (OR full TA) –accompanied by Travel Plan and Parking Management Plan if appropriate	Yes
Tree Survey/ Arboricultural statement	Yes
Water environment impact statement (water table and/or flooding matters) - Basement Impact Assessment	Yes if any excavation is proposed
Other (specify)	Possibly a wind assessment

What else needs to be done before submission

Please see [this link](#) for the national and local area requirements for submitting a valid planning application. For the type of scale drawings and plans – see [this link](#). In particular please note the need to show the relative level and extent of neighbouring / nearby properties alongside the proposals.

Reminder regarding minimum types of plans required:

- Site Location Plan (1:1250 scale) / Site Block Plan (1:200 scale) – showing the application site in red and any other land owned by the applicant close to or adjoining the site in blue
- All existing elevations (1:50 scale)
- All proposed elevations (1:50 scale)
- All existing plans including roof plans (1:50 scale)
- All demolition plans / elevations / sections (1:50 scale)
- All proposed plans including roof plans (1:50 scale)
- Existing and proposed sections (1:50 scale)
- It would be useful if plans could be submitted in an A3 format as well as to the scale outlined above.
- These plans should also detail the extent of neighbouring buildings
- All plans should indicate a scale bar on the actual plans.

Regarding the planning application fee, please see the [Council's website](#). It is advised that the application should be submitted electronically via the Planning Portal website. You are encouraged **NOT** to submit hard copies of the submission. It would however be helpful for all information submitted via the Portal to also be produced onto a series of CDs, in order to assist with internal/external consultation of the future application.

If the application is able to be recommended for approval, it would need to be considered at a Development Control Committee meeting. Please see [this link](#) to provide you with dates of upcoming committee dates in order to assist you with the timing of the submission of an application: Please also bear in mind that officers reports for committee meeting must be completed 2 ½ weeks in advance of the date of the meeting.

If the application were to be refused planning permission this is likely to be done so under

delegated powers.

You may wish to enter into a Planning Performance Agreement (PPA). Please see the PPA section of the main report for advice in this regard. This would also alter the standard 13 week determination timeframes.

As detailed elsewhere, you are also advised that the Council would welcome and encourage further meetings (ideally via a pre-app PPA) to discuss this pre-application submission, prior to any formal submission. Please see [this link](#) regarding fees for such meetings.

Prior to submitting any application, it is reiterated that you should read the [guidance](#) for submitting a valid application.

Consultation

You are strongly advised to make early contact with the following organisations/groups

- [Ward councillors](#)
- Occupiers of existing on-site buildings and all adjacent and nearby premises surrounding the site.
- Local Conservation Area Advisory Committees (CAACs) – namely [Regent's Canal CAAC](#)
- [Georgiana Leaseholders Association](#)
- [Canal and River Trust](#)
- [Camden Village Association](#)
- [Inland Waterways Association North and East London Branch](#)
- Camden Road Neighbourhood Planning Forum - Mark McCarthy [crnpforum@gmail.com] - <http://canelowes.net/crnpf-home/>
- Crime Prevention Design Advisor
- Transport for London

The [Council's Cindex Service](#) should also be used to search for and engage other local groups.

It would be helpful as part of your submission if you could set out what public consultation you have carried out, what comments have been received and how your proposal has been amended in response to such comments.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries in relation to the above matters do not hesitate to contact me.

It is important to us to find out what our customers think about the service we provide. To help, we would be very grateful if you could take a few moments to complete our [pre application enquiry survey](#). We will use the information you give us to monitor and improve our services.

Signature [via email only]

Date of Report: 28/07/2014

Name Jonathan Markwell
Designation Principal Planning Officer