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Dear Mr Holmes

Bangor Wharf, Georgiana Street, NW1 0QS

I refer to your request for pre-application advice for the following development at the above address for:

“Redevelopment of the site to provide office accommodation at ground floor level and 48 residential units in part five, part six storey and part 7 storey buildings fronting Regents Canal and Georgiana Street”

Background

You are advised that this advice is to be read in conjunction with pre application advice letter dated 18 December 2014 and the pre-application advice note dated 28 July 2014.

The main issues for consideration are:

- Land Use
- Standard of residential accommodation
- Design
- Residential Amenity
- Transport
- Trees
- Sustainability

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 March 2015, consolidated with alterations since 2011 and NPPF (2012).

The proposal would be assessed against policies CS6 (Providing quality homes); CS8 (Managing the impact of growth and development), CS14 (Promoting high quality places and conserving our heritage), DP5 (Homes for different sizes); DP13 (Employment sites and premises); DP24 (Securing high quality design); DP 27 (Basements and Lightwells); DP26 (Managing the impact of development on occupiers and neighbours of Camden's Local Development Framework and Camden's Planning Guidance).

Site Description

The site is located adjacent to the Regents Canal with a frontage on Georgiana Street adjacent to the Grays Inn Bridge. The site provides 1810m² of Class B1 and B8 floorspace and was occupied by EDF as a depot for storage of materials with ancillary workshop and offices. The site accommodates low level office and storage buildings and vehicle parking.

The site is identified in the Camden Site Allocations Local Development Document (September 2013) as Site 35 Bangor Wharf, Georgiana Street.

The Site allocation guidance encourages redevelopment of the site to provide replacement employment floorspace and new permanent (Class C3) residential accommodation.

Development will be expected to:

- Optimise the potential of the site to provide new housing (including affordable housing) while minimising potential conflicts between residential and other uses
- Provide flexible space suitable for a range of employment uses
- Contain an active frontage to Georgiana Street, and to maximise opportunities to provide linkages to the canal towpath.
- Be of a form and scale which is appropriate to the Regents Canal Conservation Area and responds to the open character of this part of the canal and to surrounding listed buildings
- Take opportunities to utilise the canal for the transportation of goods and materials, both during construction and in the operation of the development
- Ensure that the design and layout of the development responds positively to its canal setting, and contributes to the biodiversity and green nature of the canal
- Provides active frontage to the canal and to Georgiana Street, in order to improve the relationship between the site and the public realm and to enhance the appearance and safety of the surrounding street scene
- Provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible

Land Use

Employment Use:

Policy CS8 of the Core Strategy 'Promoting a successful and inclusive Camden economy' aims to support Camden's industries by safeguarding existing employment sites and safeguarding the borough's main industry area. The proposal seeks to reprovide the Class B1 floorspace at ground and basement level in compliance with this policy.

It is considered that the site is suitable for continued employment use given its good access to the strategic road network and capacity to accommodate delivery vehicles. The site allocations guidance identifies that there is potential for more intensive development of the site to provide other uses.

The proposed scheme would provide 537m² of B1 office floorspace at ground floor level. The office accommodation would be designed to be flexible and affordable and suitable for SME's which is welcome. You are encouraged to provide workspace suitable for a range of employment uses such as creative industries. You are advised to contact genny.fernandes@camden.gov.uk in Economic Development for further guidance. The provision of employment floorspace is welcome and complies with the objectives of CS8, DP1 and DP 13.

Residential Use:

Policy CS6 seeks to maximise the supply of additional housing to meet or exceed Camden's target of 5,950 homes from 2007-2017, including 4,370 additional self-contained homes and maximise the supply of additional housing over the entire plan period to meet or exceed a target of 8,925 homes from 2010-2025, including 6,550 additional self-contained homes. The proposed scheme would provide 48 self-contained units which would contribute to these targets.

The site allocations guidance states that the capacity of the site for housing provision should be maximised.

The scheme involves the provision of 48 residential units (32 market, and 16 affordable). Policy CS6 of the Core Strategy seeks to secure 50% of residential developments to be affordable (60% social rented and 40% intermediate). Policy DP3 seeks the maximum reasonable amount of affordable housing on the site. The Council would apply a sliding scale of 10% for developments of 10 dwellings (1 unit) to 50% for developments with the capacity of 50 dwellings (25 units).

It is considered that affordable housing can be provided on site and the 50% target is applicable. In the proposed scheme 33% of the units would be affordable (50% affordable rented and 50% intermediate). This falls short of the 50% target and does not comply with Council policy.

Of the proposed 48 units the Council would expect 24 of the units to be affordable with 14 social rented and 10 intermediate. If the proposed scheme will not achieve the targets set out in Policy CS6 and DP 3 the Council will take into account the economic and financial viability of the development.

The proposed mix involves 42% of the dwellings as 2 bed 4person and 33% would be 3 bed dwellings. This mix is likely to be considered acceptable in the context of the Council's priority to seek 2 bed dwellings as set out in the Dwelling Size Priorities Table which identifies that 2 bed (intermediate and market) and 3 bed (social rented and intermediate) are in high or very high demand. The provision of 6 x 1 bed and 2 x 2 bedroom intermediate flats is not in accordance with the Council's priority table.

Standard of residential accommodation

Whilst no detailed floorplans of the proposed accommodation have been provided indicative plans showing unit sizes have been provided. The 1 bed flats exceed 50m², the 2 bed flats exceed 70m² and the 3 bed flats exceed 80m². The proposed accommodation complies with the space requirements set out in The London Plan and the Council's guidance CPG 2 (Housing). The flats have access to external private amenity space in the form of terraces. The terraces should meet and exceed the London Plan standards for amenity space. The proposed flats appear to be dual aspect and are likely to be considered acceptable in terms of the standard of residential accommodation to be provided.

As a new build scheme, Part M of the Building Regulations will apply. In addition, planning policy DP6 will require all the dwellings be designed to comply with Lifetime homes standards and 10% to be suitable for or easily adaptable for wheelchair users.

Design

Policy CS14 and DP24 seeks to ensure that Camden's places and buildings are attractive, safe and easy to use by requiring development of the highest standard of design that respects local context and character and promoting high quality landscaping and works to streets and public spaces.

Policy DP25 states that development will only be permitted within conservation areas if it preserves and enhances the character and appearance of the area and will not be permitted if it would cause harm to the setting of a listed building.

The sketch proposals go some way to conforming to the parameters set out in the Site Allocation document guidance by providing active frontage, through arranging the two main blocks of accommodation perpendicular to the canal to create to retain a sense of openness at the canal edge, and by limiting the height of the proposed development in the west of the site in consideration of the potential impact on properties at 116-132 Royal College Street.

In establishing the appropriate limits to the scale and massing of development a balanced view will be taken of the merits of the proposal in preserving and enhancing the character of the Regents Canal conservation area and the delivery of an optimal housing led redevelopment of the site. The guiding principle will be that new buildings on this site should conform to the scale of the surrounding network of Victorian streets and to the canal as a corridor of unique character and valuable public open space. To the north and east of the site we consider the relevant scale reference points are the building on Eagle Wharf and The Constitution public house. Both are positive contributors to the conservation area. The frontage of the site's southern edge should be viewed as an extension of Georgiana Street.

The design of both buildings and spaces should respond to the historic industrial character of the site. The Site Allocation document makes specific reference to the fact that the yard area retains extensive areas of granite setts which should be exploited in any development and that the canal dock which formerly served these wharfs is filled, and could be enhanced, to help to achieve a positive relationship with the neighbouring Eagle Wharf building and perhaps to provide an amenity space for residents with a strong sense of place enriched by the link to the sites past use.

Residential Amenity

Policy DP26 states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity in terms of visual privacy and overlooking; overshadowing and outlook; as well as daylight and sunlight levels.

The application site is surrounded by industrial and residential properties. A daylight/sunlight assessment in accordance with BRE guidance would be required to assess the impact of the proposed building on surrounding residential properties.

The rear balconies have been designed to prevent overlooking into surrounding properties. Privacy screening may be required where necessary.

Transport

The scheme is proposed to be car free which is welcome. The site has excellent transport links (Public Transport Accessibility Level 6a). No details of cycle storage have been provided but adequate provision in line with The London Plan and Council's requirements (1 space per 1 bed flat and 2 spaces per 2 and 3 person dwellings would be expected.

Designated waste storage areas should be provided for both the residential and office accommodation.

A Construction Management Plan would be secured via a s106 as part of any possible future planning permission at the site.

You are advised to contact the Transport Planning Officer James.Hammond@camden.gov.uk for further advice.

Trees

Policy DP 25 seeks to preserve trees which contribute to the character of a conservation area and provide a setting for architectural heritage.

There is an existing Willow Tree (Category B) which is to be removed as part of the proposed scheme. This is regrettable and the removal of the Willow tree and any other trees to be removed will require a full justification as part of an arboricultural report.

You are advised to contact the Tree Officer nick.bell@camden.gov.uk.

Sustainability

The scheme should be designed to achieve Level 4 Code for Sustainable Homes for the residential accommodation and BREEAM 'excellent' for the Class B1 premises.

The Site Allocations document states that that new development on this site would be expected to make use of energy from efficient sources including decentralised energy networks and could contribute to a decentralised energy system, along with nearby sites 40 (Kentish Town Police Station, Holmes Road) and 41 (Royal College Street). The site is located in close proximity to the community heating for social housing bounded by Plender Street and Camden Street. The Council would expect the energy strategy for a future development to test the feasibility of establishing a heat network to link with nearby Camden housing estates.

Other matters

Should you subsequently purchase the site, Officers would welcome, envisage and expect comprehensive pre-application discussions to take place, ideally structured through a pre-Planning Performance Agreement. Please contact me directly should you wish to discuss this further.

Concluding comments

The Site Allocations document recognises the potential there is for the site and Officers will aim to ensure that the best possible proposals at the site materialise. Officers would welcome and encourage further discussions with you should you subsequently purchase the site.

This document represents the Council's initial view of your proposals discussed at the meeting on 19th February, 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 us in this respect, we would be very grateful if you could take a few moments to [complete one of our surveys](#). We will use the information you give us to monitor and improve our services.

Yours sincerely

(sent via email)

Kathryn Moran
Senior Planning Officer – Development Management