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Our ref: 2015/6335/PRE
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Chris Pittock
Spenthorpe Planning

Reference: 2015/6335/PRE

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Dear Mr Pittock

Bangor Wharf, Georgiana Street, NW1 0QS

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

Redevelopment of site to provide replacement employment floorspace at groundfloor and new permanent residential accommodation (class C3) of up to 51 units and building up to 7 storeys.

Background

You are advised that this advice is to be read in conjunction with pre-application advice letter dated 02/04/2015 under reference 2015/0278/PRE. The following advice is in response to the meeting on 17/11/2015; consultation with internal colleagues; an informal Design Review Panel and a Case Conference containing senior planning and design officers as well as managers.

The main issues of consideration covered by this response are:

- Acceptability of the removed/proposed employment floorspace
- Amount of affordable housing/mix of private and affordable units
- Housing mix (i.e. size of units)
- Quality of residential accommodation
- Design, impact on the character and appearance of the Regents Canal Conservation Area and nearby listed buildings
- Residential amenity of neighbouring occupiers
- Transport and highway implications
- Trees and landscaping
- CIL
- Contaminated land

A description of the site, the relevant policies that would be applicable to the development and details of what would be required in the submission of a full planning application have been provided as part of the previous pre-application advice. Discussions regarding

signing up to a Planning Performance Agreement (PPA) and further pre-application meetings are also ongoing.

Acceptability of the removed/proposed employment floorspace

The site currently provides 884sq.m of Class B1 office accommodation and 253sq.m of B8 storage/warehouse 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. 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.

Any proposed office accommodation would be expected to be flexible and affordable and suitable for SME's. It is worth noting that affordable accommodation doesn't just relate to the cost to rent the space but flexibility in terms of the leases. 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 and tom.baines@camden.gov.uk in Economic Development for further guidance.

In any future pre-application or planning submission, a clear narrative as to the size and quality of the existing employment space should be provided. In addition, statement(s) explaining the reasons for the previous occupier (EDF) moving away from the site should be submitted.

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. 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.

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. We would therefore expect the existing employment space to be maintained or increased in accordance with policy.

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. As part of further pre-application discussions and any formal submission you should provide details of operators that you are in discussion with. The quality of any proposed employment space is an important consideration to ensure it is flexible and available for occupation by a range of different business users to account for DP13 parts (e) and (f) of the policy and the SAD which requires provision of flexible space.

It is noted that the previous pre-application proposal under 2015/0278/PRE provided 851sq.m of B1 office floorspace at ground floor level which was largely considered acceptable in officer opinion. The current submission would only provide 515sq.m which is a loss of 622sq.m of employment space. No justification for the significant loss of

employment space has been given. The loss of this level of employment space is considered unacceptable as it is contrary to Council policy which seeks to retain land and buildings that are suitable for continued business use.

In terms of the location of the employment space, it would be preferable if it was all situated together and not split through. In addition, the employment use does not have to be limited to ground floor.

Amount of affordable housing/mix of private and affordable units

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. The Council generally seek intermediate rented housing, rather than shared-ownership housing (where occupiers buy a share and rent the remainder).

The proposed scheme is currently providing 15 (9 affordable rented units and 6 shared ownership) affordable units out of 50 and the affordable floorspace would be 978sq.m out of 3299sq.m (29.6%). It is noted that you have submitted revised ground floor plans with the option an additional affordable unit. While this would increase the quantum of affordable units, it would also result in the further loss of employment space.

The current affordable offer of 30% falls well short of the 50% target and does not comply with Council Policy. Any future planning submission would need to demonstrate that the proposed affordable housing is the maximum reasonable amount possible for the site.

You are encouraged to work with Neil Cleary (neil.cleary@camden.gov.uk) who is the Affordable Housing Development Co-ordinator to discuss different scenarios in terms of quantum of affordable vs affordability of the units and the mix provided.

Housing mix (i.e. number of bedrooms per unit)

Market units

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 present the mix of market units is heavily dominated by small units including 21x1 bed units (42%) which are lower priority. Although the policy target of 40% 2 bed units is met in itself, it is advised that there is a significant shortfall in the number of large units (9x3 bed units and no 4 bed or more units 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 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.

Affordable units

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. 3 bedrooms are high priority and 4 bedrooms are very high. The current affordable rent units include a 1 bed, 6x2 bed and 2x3 bed. This mix is unacceptable and we would seek 50% as large (3 bed plus) at a very minimum.

The shared ownership units are exclusively 1 and 2 beds units. We would support smaller units for intermediate housing as this can keep costs down.

Quality of residential accommodation

Standard of living accommodation

The 1 bedroom units are at least 50sq.m; the 2 bedroom units are 70sq.m or more and the 3 bedroom units are all above 80sq.m which is encouraged.

The upper floor units all benefit from external amenity space (through balconies/roof terraces) and should meet and exceed the London Plan standards for amenity space. No amenity space is shown for the ground floor units and this would be encouraged if possible.

While limited details of windows and openings are shown on the proposed floor plans the majority of the proposed flats appear to be dual aspect, apart from the 1 bed market units within the main 7 storey block fronting Georgiana Street. It would be preferable if all of the units could be dual aspect. If windows/terrace space is to be proposed on the side elevation of the 1 market bedroom units to the rear of the main block which adjoin the affordable units, care needs to be taken that there are no resulting privacy issues between these units as there could be mutual overlooking or harm through noise and general disturbance from the amenity space. This is discussed further below.

Amenity of proposed units

Significant consideration will need to be given to the proposed layout of the units to reduce 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). Good standards of daylight and sunlight would be required for the new units and consideration must be given of overshadowing of the communal and open space areas.

During our meeting on 17/11/2015 I ran through some of the issues with the current plans. I will summarise these below:

- Privacy issues between the terraces serving the first floor 1 bed market units within the smaller 5 storey block and between these terraces and the adjacent communal terrace for the affordable units

- Privacy issues between the first floor level terrace serving the rear 1 bedroom market unit on the first floor of the main 7 storey block and the adjacent bedroom of the 2 bedroom affordable unit. The terrace would lie immediately adjacent to the rear window of the affected bedroom which would be an unacceptable relationship. In addition, it would also lie adjacent to a communal terrace
- The communal terrace serving the affordable units would be significantly overlooked
- The market 2 bedroom and 3 bedroom units (over floors 1-5) on the northeast facing elevation of the main 7 storey block all benefit from balconies fronting the canal. The privacy between the terraces which lie adjacent to each other needs to be considered due to their proximity and relationship
- The market 3 bedroom and 1 bedroom units on the fourth floor of the 5 storey block have balconies on the northeast facing elevation. 3 separate balconies are shown but it is unknown which parts relate to which unit. The balconies appear to overlap the units and would cause privacy issues
- The relationship between the terraces on the sixth floor of the main 7 storey block could cause privacy issues

Design, impact on the character and appearance of the Regents Canal Conservation Area and nearby listed buildings

Concerns were raised during the meeting on 17/11/2015 regarding the height and scale of the proposed buildings. Since the meeting there has been consultation with internal colleagues (including those in Conservation and Heritage and Urban Design) and the plans have been subject to an informal Design Review Panel and a Case Conference. Frances Madders has provided formal observations which have been sent to you separately. Michelle O'Doherty from Conservation and Heritage has reviewed these comments and has provided additional observations which have been incorporated below.

Height, bulk, massing and scale

The proposed buildings have much larger footprints than the finer grain of the existing buildings on the site, on Eagle Wharf and the shallower plots that line the canal to the south. At 7 storeys, the proposed building also stands significantly taller than buildings in the area immediately surrounding the site without adequate justification for the additional height.

Any new design should respect the scale of the particular location. There is no townscape case for the site to be considered a 'gateway' or 'marker' site and there are important differences between the context of this site and the examples provided of other taller canal side buildings in the Design and Access Statement.

As a consequence of its height and deep floor plate, the proposed development is excessively bulky in appearance. This bulkiness is accentuated by the massing of the building. The stepped profile to the Georgiana Street elevation is a clumsy and poorly resolved design solution that responds only to the angle of daylight to neighbouring properties rather than a considered approach to the development of the building's form and massing. The stepping device serves only to underline the marked change of scale between the proposed building and its surroundings and makes it difficult to bring any architectural coherence to the elevation.

A similar device of stepping down in scale from 7 to 5 storeys is also intended to mediate the change in scale to the Eagle Wharf building. Despite this attempt, there is no apparent relationship in form or scale between the 5 storey building and its neighbour or any demonstration of an appreciation of the qualities that make it a positive contributor to the character of the conservation area. It is not a requirement that there should be any direct relationship between the architecture of the proposed building and that of its neighbour but more skilful handling of the bulk and mass of the proposal is required to ensure that it does not detract from the setting of Eagle Wharf.

Though not listed, the harmonious butterfly roof profile form on Royal College Street is an important feature of the historic townscape such that any development must not obliterate this aesthetic from public view but seek to maintain it as part of the immediate area's visual qualities allowing opportunities for glimpse views by the way in which the building(s) are set out on the subject site. This is not possible with the current proposal.

The stepping of the corner building away in height from Royal College Street towards the canal creates a large bulky and over scale mass on the plot's corner, creating a very uncomfortable and hostile juncture for pedestrians and also creating an out of scale development as it relates to other streetscape features such as the bridge.

Detailed design

The detailed design must respond to local character and history and reflect the identity of local surroundings and materials. Given the conservation area context of the Regents Canal, it is the industrial heritage of the site that should inform the detailed design of the proposed buildings. We do not consider that the reinterpretation of elements of the local vernacular of the Victorian terrace and pubs is an appropriate architectural response to the character of this site. They are of no relevance to an apartment building with a very different scale and setting and do not serve to develop a coherent architectural vocabulary for the typology of the canal side apartment building. Without wishing to be prescriptive about what an appropriate architectural response might be, contemporary interpretations of the Victorian warehouse vernacular might prove to be a more successful model.

The two main proposed buildings are apparently deliberately unrelated in materials and design. It is assumed that the intention is for them to be read as separate developments so as to break down the apparent mass and bulk of the proposal. However, beyond this strategy, the selection of the materials of the lower of the two buildings and details such as its roofline seem quite arbitrary. The general impression is that this is a generic approach to architectural expression rather than reflecting an understanding of local distinctiveness in all but the most superficial treatment of surface.

The elevations of the larger of the two buildings feature a high proportion of blank wall with small openings and ground floor elevations that are unrelated to the upper floors of the buildings. The attempt to bring some order and coherence by grouping window elements in two storey high frames is undermined by the lop-sided profile generated by the stepping up in height. The proposals for this site must reach a much higher standard of architectural expression and quality than the undistinguished buildings that line the canal to the south.

Landscaping (also see Trees and landscaping section below)

The landscape design of the courtyard space as the centre of the site has an important role to play in reinforcing the sense of place through linkages to its past use and in supporting the mixed use function of the site. Given that there are no buildings on the site worthy of retention, it is the yard that provides materials and other features that could help to make this link with the past. It is disappointing that the proposals do not go further in embracing the history of the site through more imaginative treatment of the partially filled canal dock. We are also concerned that the retained granite setts should be given a higher level of prominence in the landscape proposals.

As noted in the Conservation Area Appraisal, the character of canal side planting, such as the existing willow tree on this site, is informal and complements its picturesque nature as well as providing important wildlife habitats at the canal edge. The proposed tree planting follows a grid pattern so has a formality that does not fit with the existing character. It would be preferable to see one or two trees in the proposal with the potential to grow to be quite substantial mature trees rather than 8 smaller specimens.

In addition, the layout and quality of the space appears poor due to the grid pattern of the planting and the breaking up of the area into lanes. The space would not be an attractive area to be used and a revised layout to include more open spaces would be encouraged.

Residential amenity of neighbouring occupiers

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; and daylight and sunlight levels. As mentioned in the earlier pre-application advice, a daylight/sunlight assessment in accordance with BRE guidance would be required to assess the impact of the proposed building on surrounding residential properties.

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 between windows is generally required; this should be followed in any proposal at the site, with any shortfalls identified and explained. The footprint of the proposed building should be set away from the Royal College Street buildings as much as possible. The current proposal shows that the building would be located along the rear boundary of these properties with first floor roof terraces above. Detailed analysis will need to be submitted to show that this relationship is no worse than existing and the upper floor elements of the proposed development should be setback as much as possible. There are also several terraces and upper floor windows facing towards the rear elevations and gardens of the Royal College Street properties. These have the potential to result in overlooking issues and a loss of privacy.

If any external plant is proposed 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. It is noted that plant is currently proposed on the ground floor near the rear boundary of the

residential properties on Royal College Street. An acoustic report would need to address whether there would be any noise implications for these neighbouring residential properties or the proposed units on the site.

Transport and highway implications

James Hammond attended the pre-application meeting and will be your transport contact: james.hammond@camden.gov.uk. Below is a list of the following things that would need to be included as part of any formal submission:

- 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)
- It might be possible for a disabled parking pay to be placed on the public highway
- 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 on the street would be acceptable
- A PERS audit should be submitted
- 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.

Trees and landscaping

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.

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. Usually, when 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.

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).

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.

The provision of green/brown roofs should be incorporated wherever practical (such as at various flat roof levels), in line with policy DP22.

Bird and bat boxes and other biodiversity measures should also be integrated into the design.

The Parks and Open Space team also incorporates Nature Conservation officers. It is considered imperative that any proposal contributes 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 has been noted by previous officers 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.

CIL

The proposal by its size and land use type will be liable for the London Borough of Camden's Community Infrastructure Levy (CIL) introduced on the 1st April 2015 to help pay for local infrastructure and the Mayoral CIL which helps fund Crossrail introduced on 1st April 2012. Further details on CIL and how it is charged can be found on our website: <http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/community-infrastructure-levy/>

Contaminated Land

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 and 0207 974 2794), who is the Contaminated Land Officer in the Environmental Health team.

Conclusion

The site has many different elements and the proposals outlined at our meeting present many challenges, in particular about the scale and form of development. As such, the proposals would require significant refinement in advance of any possible planning submission, which officers would strongly suggest is progressed through a series of meetings within a Planning Performance Agreement (PPA). 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.

Any PPA would 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. 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.

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 4908.

Yours sincerely,

Jonathan McClue
Senior Planning Officer
Planning Solutions Team