

5 July 2017

Delivered by email and post

Gavin Sexton
Principal Planner
Regeneration and Planning
Supporting Communities
London Borough of Camden

Dear Mr Sexton

CAMDEN GOODS YARD: PLANNING APPLICATION

This application is made by Turley on behalf of Safeway Stores Limited and BDW Trading Ltd. The scheme description is:

Demolition of existing buildings (Class A1 foodstore and Sui Generis petrol filling station) and associated highways and site works including removal of existing surface level car parking and retaining walls along with road junction alterations.

Redevelopment of petrol filling station site to include the erection of a new building of up to six storeys and up to 11,243 sq m GEA floorspace to accommodate a petrol filling station (Sui Generis), flexible Class A1, A3 and A4 floorspace, Class B1 floorspace and a winter garden; associated cycle parking; public green space; public toilets and other associated works and highways works. For a temporary period of up to thirty months part of the ground and all of the 1st floor of the building will be used for a Class A1 foodstore with associated car parking.

Redevelopment of the main supermarket site to include the erection of buildings (Blocks A to F, including Blocks E1 and E2) of up to 14 storeys accommodating up to 573 homes and up to 60,568 sq m GEA of residential floorspace together with up to 28,345 sq m GEA non-residential floorspace within Class A1 (foodstore), flexible Class A1 and A3, Class B1a and B1c, Class D2 community centre, Sui Generis use at roof level of 'Block B' for food and plant growing/production facility (including small scale brewing and distilling) with associated ancillary office, storage, education, training, café and restaurant activities; together with associated new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility; and other associated works, including highways works.

This is a major application (supported by an Environmental Impact Assessment) of scale that will deliver much needed homes, jobs and community facilities. The site is underused yet is highly accessible and sits within the designated Camden Town Centre.

The Charlotte Building
17 Gresse Street
London
W1T 1QL

T 020 7851 4010 turley.co.uk

This scheme comes forward in the wider context of the importance of optimising our Town Centres in order to meet the profound development challenges found at both London and Camden levels.

The Challenge for London

The golden thread in favour of sustainable development that runs through plan-making and decision-taking is nowhere more important than in London where there is an absolute and pressing need for new homes, jobs and community infrastructure. Already in London there are more residents (over eight million) than at any time in its history. It is estimated that by 2036 that population will have grown to over 10 million people – all needing to find homes in the already built up areas of London.

Fewer people are leaving London, more people are coming to London to live, all Londoners are living longer. We know that London's population is growing at around 100,000 people per annum. There are more households forming in London (40,000 per annum) and there is likely to be an increase of around one million households between 2011 and 2036 (The London Plan March 2016 1.15B). On our current estimates 800,000 new homes will be needed by 2021 and with current completion rates averaging only around 25,000 a year there will be a deficit, by 2021, of 660,000 homes.

As The London Plan says *"Taken as a whole these trends mean we will have to plan for more homes, particularly meeting the accommodation needs of families and single person households including older people, both of which are likely to increase in number"*. There is a particular strategic need to deliver affordable homes for families and older people.

Given this context The London Plan states (para1.47) *"the only prudent course is to plan for continued growth"* which means planning for:

- substantial population growth;
- an ever more diverse population;
- a growing and ever changing economy;
- progress in tackling persistent problems of poverty and deprivation;
- climate change;
- careful and efficient management and use of resources;
- protecting and enhancing natural environments and habitats; and
- improving quality of life for all Londoners and all of London.

In order to accommodate these demands it will be necessary to do so *"in ways that do not worsen quality of life for London as a whole (which) means we will have to ensure the best use of land that is vacant or under-used"*, in tackling problems of unemployment and joblessness by *"making sure Londoners have the education and skills they need to better access jobs in their city"* and *"by enabling growth and change, while also supporting the retention of London's heritage and distinctiveness, and making living here a better and more enriching experience for all"*. (para 1.48).

The London Plan brings a strategic emphasis to and a new focus on quality of life. There is a fundamental need to ensure that there are enough homes to meet *"the needs of Londoners at all stages of their lives and whatever their circumstances, and designed so they actively enhance the quality of neighbourhoods in which they are located"* along with *"protecting and enhancing what is distinctive about the city and its neighbourhoods, securing a sense of place and belonging through high quality architecture and design that sits well with its surroundings"* (para1.44).

The CGY site lies within Inner London where *"The Mayor will, and boroughs and other stakeholders should, work to realise the potential of inner London in ways that sustain and enhance its recent economic*

and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting there" (London Plan Policy 2.9 (Inner London)).

This challenge for London will be met through intelligent intensification, densification and development optimisation at highly accessible locations and town centres where there is convenient proximity to amenities and to social and economic infrastructure.

The challenge for London will be met through design quality, distinctive architecture and placemaking; through the creation of successful, functional, mixed use, adaptable and resilient places with successful public spaces all seamlessly integrated into their urban context; places where a range of homes and a mixture of tenures are all available and genuinely affordable so as to build balanced and inclusive communities.

The Challenge for Camden

In meeting the challenge for London Camden must play its full part. It is a central London borough in the right location and with the right development opportunities to make a major contribution to the pressing housing and economic needs of London.

Almost 210,000 people live in the Borough, a population which is anticipated to grow by 18% (36,000) between 2006 and 2026. Like London as a whole it is growing because of an increase in births, fewer deaths and inward migration. Camden is a popular place to live but this means that average house prices are the third highest in London. Demand for affordable housing far outstrips supply.

We know that the number of homes needed in Camden is increasing at a greater rate than the total population, we know that economic factors have rendered home ownership less accessible to residents and we know that demand for all housing but particularly for social housing has increased significantly (the latter by 50% from 2005 -2011 to 22,000 households). (Camden Housing Strategy 2011-2016).

Camden's minimum 10 year housing target (2015-2025) as set by The London Plan is 8,892 dwellings with an annual monitoring target of 889 yet it should be clearly understood that these targets are moderated by a capacity assessment and are not a true reflection of need or demand. The challenge then is not just to meet the targets but to continuously exceed them taking every opportunity of scale to deliver.

These issues are clearly understood in the Camden Core Strategy (CCS) which clearly states that among the challenges the Borough faces are:

- *"adapting to population growth and our changing world while improving the quality of life of residents and the provision of services, and accommodating new and expanded buildings while preserving our valued places and promoting high quality design" (para 20);*
- *needing "to manage change and growth so that they take place in a way that respects the character, heritage and distinctiveness of Camden's valued and special places. We need to continue to try to enhance our local environment, for example by reducing air pollution and improving our streets and public spaces" (para 22);*
- *"providing a diverse range of housing. In terms of price and type, and securing mixed areas in both private and social housing" (para 23) and*

- wanting “to make sure that members of our community have access to good housing, jobs, skills and training, education, public transport and health and community facilities to promote equality, inclusion and opportunity”. (para 25).
- These responsibilities are properly understood. There is a well-developed, up to date and progressive planning regime. The Development Plan is in general conformity with the London Plan. The Borough’s planning documents are consistent with national policy.

Indeed the CCS Vision is that “Camden will be a borough of opportunity –

- *a vibrant and diverse part of inner London that will develop its position as a key part of the capital’s success, while improving the quality of life that makes it such a popular place to live, work and visit. A borough with homes, jobs, shops, community facilities and infrastructure needed to support its growing population, businesses and visitors;*
- *it will continue to be an attractive place to live with strong, distinctive residential communities, a significant increase in the supply of homes and a wide range of facilities available for local residents;*
- *Camden will be a borough in which our valued, historic and high quality places, ...and the other places that give it its unique identity are preserved, and where possible, improved and where all developments will be of the highest possible standard; and*
- *Our town centres.... will be successful, safe and attractive, each with their own character and role”* (para 31).

To meet these challenges Camden must make best use of limited land and accordingly is seeking to encourage higher densities in the most accessible parts of the borough including its Town Centres of which Camden Town is of key importance. Camden recognises that “*Good design can increase density while protecting and enhancing the character of an area*” (1.22). The responsible developer should promote schemes of “*excellent design quality (which) sensitively consider the amenity of occupiers and neighbours and the character and built form of their surroundings, particularly conservation areas*” (1.22).

Accessible Town Centre location

The London Plan Policy 2.15 (Town Centres) states that “*The Mayor will, and boroughs and other stakeholders should, co-ordinate the development of London’s network of town centres in the context of Map 2.6 and Annex 2 so they provide: a) the main foci beyond the Central Activities Zone for commercial development and intensification, including residential development b) the structure for sustaining and improving a competitive choice of goods and services conveniently accessible to all Londoners, particularly by public transport, cycling and walking c) together with local neighbourhoods, the main foci for most Londoners’ sense of place and local identity within the capital*”.

Strategically London’s town centres are identified as a key spatial priority of the London Plan, providing access to a range of services and enabling all parts of London to make a greater contribution to London’s economic success (para 2.69). In inner London, town centres are the most accessible locations on the public transport system and at the centres of their communities. They are seen by the Mayor as key locations for a diverse range of activities as well as housing, social infrastructure and public open space. They are also key nodes for more effective land use and transport integration, enabling intensification,

encouraging walking, cycling and greater use of public transport and fostering social inclusivity (Para 2.70).

Para 2.71 recognises that a “*wide range of uses will enhance the vitality and viability of town centres. Leisure uses contribute to London’s evening economy and ensure that town centres remain lively beyond shopping hours. So too does more and higher density housing, which can capitalise on their public transport accessibility, enhance footfall, vitality and viability and lever in resources for comprehensive town centre renewal as part of mixed use redevelopment and expansion. In some centres, there is scope to redevelop or convert redundant offices...into more active uses, especially housing*”.

In this strategic context the site sits in the Camden Town Centre. Policy CS3 of the Core Strategy seeks to manage growth and distribution through promoting appropriate development at highly accessible locations such as Camden town centre. The town centre is considered to be a suitable location for the provision of homes, shops, offices and community facilities.

Policy 2.15 (Town Centres) of the London Plan sets out that town centres should be the main focus beyond the Central Activities Zone (CAZ) for commercial development and intensification, including residential development. Supporting Paragraph 2.72F highlights that in all centres with good public transport, the residential element of mixed use development is likely to have scope to go towards the top of the relevant density range. Higher density developments are particularly suitable in addressing the growing housing requirements in London for different types of households.

Encouraging mixed-use development of scale which optimises genuine development potential is critical if Camden is to have any chance of meeting its challenges. Growth is specifically directed to town centres, this is why they are designated. The designated and regenerating town centre of Camden Town has a crucial role to play in receiving such development especially where it can be demonstrated that there are few if any material considerations of sufficient weight to depart from the well-made local plan.

The opportunity at Camden Goods Yard

At Camden Goods Yard we have the rare opportunity to deliver at scale and to make a significant and important contribution to meet these challenges through an intelligent, well-conceived and attractive mixed use development which includes:

- 573 homes with a population yield of 1,124;
- of which 184 are affordable homes (35% by floorspace);
- all at a density comfortably within the range proscribed by the Mayor’s Sustainable Residential Quality Matrix;
- a re-provided food store making an important and accessible retail offer for local residents and vital contribution to the viability of the high street ;
- a store that provides 161 jobs for local people;
- a store that continues to trade (first in temporary then in permanent locations) throughout the development process;
- a re-provided petrol filling station;
- 14,390 of new office space, makers space and flexible retail space yielding 1,012 full time equivalent jobs;
- affordable workspace to support local small and medium size start-up businesses;
- community facilities including an Urban Farm;
- a community centre and public toilets;
- a high quality public realm of activated streets and spaces;

- an approach to placemaking which directly responds to the railway heritage of the site; to the scale and character of the area's warehouse legacy and to the setting of surrounding heritage assets;
- new architecture and townscape of the highest quality; and
- a new neighbourhood that is recognisably of Camden.

In these terms the scheme meets the local planning authority endorsed Client Vision which, when set at the outset of the project, stated that:

“Our vision is to enable the delivery of an attractive, inclusive and accessible mixed use neighbourhood at Camden Goods Yard. The new neighbourhood will become an integral part of Camden in physical, economic and cultural terms. It will be a new place that builds on the sites’ distinctive past, that is respectful of neighbours and which optimises the potential to realise much needed local jobs, homes and shopping.”

Yours sincerely,

A handwritten signature in grey ink, appearing to be 'M. Lowndes', with a long horizontal flourish extending to the right.

Michael Lowndes
Senior Director

michael.lowndes@turley.co.uk