



CAMDEN GOODS YARD

CAMDEN GOODS YARD PLANNING STATEMENT

July 2017



Planning Statement

Camden Goods Yard, NW1 8AA

July 2017

Turley

Contents

Executive Summary	i
1. Introduction	5
2. Application Site context	7
3. Planning policy context	14
4. Description of development	22
5. Pre-application engagement	35
6. Design and Heritage	45
7. New homes	63
8. New commercial premises	78
9. Public realm	85
10. Respecting our neighbours	91
11. Transport and Infrastructure	101
12. Environmental sustainability	109
13. Construction management	126
14. Community infrastructure and planning obligations	129
15. Conclusions	134
Appendix 1: Planning application submission documents	136
Appendix 2: Site Plan	138
Appendix 3: Planning history	139
Appendix 4: Pre-application feedback	147
Appendix 5: Developer's Briefing feedback	148
Appendix 6: Vision and Principles Document	149
Appendix 7: Alternative Child Yield Methodology (LBC)	150

Oliver Jefferson
oliver.jefferson@turley.co.uk

Client
Turley

Our reference
BARL3002

July 2017

Executive Summary

1. Morrisons and Barratt London (Safeway Stores Limited and BDW Trading Ltd) are pleased to submit this planning application for the redevelopment of the Morrisons supermarket and petrol filling station, which forms part of the Camden Goods Yard (CGY) area.
2. The Application Site forms an important part of Camden Town Centre. There is a significant opportunity to make the optimum use of this under-utilised yet well-connected site to deliver against a broad range of key policy objectives and to make a positive contribution to the London Borough of Camden (LBC).
3. Camden and London more widely, is in the midst of a housing crisis and there is also a significant need for a variety of new commercial and community spaces to support the economy and local community. The proposed masterplan for the Application Site, as part of the wider CGY area, will make a much-needed contribution to the supply of new homes, including affordable housing, and will deliver a sustainable range of commercial and community uses within a genuinely mixed-use new neighbourhood, which existing and new residents, workers and visitors will appreciate as an attractive and connected community.
4. Importantly the Development Plan context establishes clear policy support from both LBC and the Greater London Authority (GLA) for the principles of what is now being brought forward for the site. Moreover, LBC has drafted and consulted upon a specific Planning Framework for the Camden Goods Yard, including the Application Site and surrounding sites. The Framework is clear that there is an opportunity to create a new mixed use neighbourhood *'to provide a significant number of much needed new homes, affordable homes, varied commercial space, new public realm, open spaces and community facilities'*. This is what the proposals will deliver.
5. The proposals will provide 573 new homes; this is a significant contribution to local housing supply. Of these homes, 184 will be affordable housing, including Affordable Rented and Intermediate Rented units. 35% of the residential floorspace and 39% of habitable rooms will be within an affordable tenure. The scheme will therefore provide for genuine housing choice.
6. Barratt London and Morrisons are committed to delivering affordable housing in recognition of the high degree of housing need within Camden and across the capital. Pre-application discussions have indicated that the provision of 35% affordable housing is supported by the GLA and LBC in this instance, in accordance with emerging GLA planning guidance.
7. The proposals will deliver 39,576 sq m GEA of commercial floorspace, including office space, maker space and flexible retail space. There is a need for a variety of new commercial space within the Borough and provision is encouraged and directed to accessible areas such as Camden Town. The proposals will make an important contribution to this supply. A mix of active uses will engender a vibrant and successful neighbourhood.

8. The proposed commercial space includes a proportion of affordable workspace and also the provision of 'maker spaces' for creative industry. This will ensure a broad mix of commercial occupiers and the creation of a vibrant working community within the development.
9. The supermarket will be re-provided with an improved modern offer at the heart of the site. A temporary foodstore will be provided on the site of the Petrol Filling Station (PFS) to ensure that existing customers continue to be served throughout the development process. The PFS will be re-provided once the new food store opens on the main site.
10. The proposals have been developed through collaboration between three award-winning architectural practices: Allies and Morrison, Piercy & Company and Niall McLaughlin Architects. The proposed masterplan is carefully designed to optimise the development potential of the site whilst creating high quality buildings and public spaces which sensitively respond to the surrounding area in both its current and prospective future forms. The proposed masterplan seeks to create a new high quality neighbourhood within Camden Town Centre.
11. Height and massing has been carefully considered so that the location of taller buildings within the scheme is sensitive to the surrounding townscape context, including with regards to heritage assets. The proposals seek to make best use of this centrally located site whilst remaining respectful of the local context and character.
12. In the context of a highly accessible location the proposed masterplan ensures good permeability across the site along with a choice of routes and enhanced connections between the site and surrounding area. The scheme's high quality public realm is an important component of wider placemaking. There will be clear and legible routes through the new neighbourhood but also many reasons to stay and spend time within the new neighbourhood. The scheme will, in particular, facilitate a pedestrian and cycle connection through from Ferdinand Street across Chalk Farm Road and onto Oval Road. The proposed masterplan is also future-proofed for a range of further connections, such as northwards through Juniper Crescent, should future redevelopment of that estate come forward and to the adjoining Camden Lock Market with the future potential for realising direct onward connection to Camden Town Underground Station.
13. The new neighbourhood has been designed to incorporate significant areas of public realm, including public yards, public parks and play space, together with communal amenity space for residents. The landscape scheme has been designed to promote biodiversity and the health and wellbeing of residents and visitors.
14. The new neighbourhood will be publically accessible with a broad range of shops and facilities. The proposals include a community centre. There is also a proposed rooftop urban farm with public access and a community growing space for residents. The whole neighbourhood, in terms of its public spaces, will be accessible to the public.
15. The Application Site sits on the edge of Camden Town Centre and forms part of the wider Camden Goods Yard area. The proposals have been developed with reference to the development prospects of neighbouring sites and the emerging Planning Framework. During pre-application discussions an indicative masterplan for the wider

area was considered by the architectural team in order to future-proof the scheme now presented.

16. Extensive pre-application engagement has been undertaken with the LBC, with the local community and with key stakeholders. This has informed significant changes to the scheme during design development, including a notable reduction in the scale and quantum of development but also an evolution of the proposed masterplan, architecture and public realm to the benefit of the scheme.
17. The amenity of neighbours has been an important consideration, which has influenced the form of the proposed development. The site is an island site, separate from a direct relationship with many residential properties. However, there are a number of immediately adjoining properties, such as those at Gilbeys Yard and Juniper Crescent; consideration of a range of amenity considerations, including outlook, privacy, sunlight, daylight, noise and air quality impacts, has been accounted for in the design of the development. The proposals have minimised and mitigated amenity impacts as far as possible, whilst also making best use of the opportunity presented by the site to deliver much-needed new homes and commercial space. Whilst there will be some impacts these are considered on balance to be reasonable given the planning benefits of the proposal.
18. The site has been developed in accordance with the vision which Morrisons and Barratt London established from the outset:

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.

19. This vision aligns with that set out within the Foreword to the Planning Framework:

Camden Goods Yard is a once in a generation opportunity to create a new mixed-use neighbourhood at the heart of the borough.

This substantial area of almost 9 hectares in an advantageous location, partially within the major London Town Centre of Camden Town has the scope for redevelopment and intensification. It has the potential to provide a significant number of much needed new homes, affordable homes, varied commercial space, new public realm, open spaces and community facilities.

Redevelopment provides the chance to address the area's significant constraints and issues. It is an opportunity to connect this highly isolated area with the Town Centre and surrounding neighbourhoods. It can create a new integrated place that adds to the area's rich cultural identity and character, and builds a sustainable and resilient community, fit for the future.

20. In accordance with the Vision set out within the draft Planning Framework, the redevelopment proposals will create a vibrant neighbourhood with a mix of complementary uses which intensify and optimise the use of the site. The proposals will

deliver a significant number of new homes alongside a diverse range of commercial uses to create a new part of Camden that will augment the confident identity of Camden Town. The approach to architecture and masterplanning results in an exemplary approach to the design of buildings and public spaces, resulting in an accessible, permeable and open new part of the borough which will welcome visitors, workers and residents throughout the daytime and evening.

21. The proposals will deliver these visions for the Application Site and thereby facilitate the wider regeneration of the CGY area, in accordance with LBC's aspirations for the site.
22. Delivering sustainable development is the fundamental objective of planning policy for England. The proposals represent sustainable development, as defined by the National Planning Policy Framework, for the following reasons:
 - Economic – The proposals will directly and indirectly accommodate and generate a significant number of new jobs. The economic benefits are set out within the planning submission documents.
 - Social – The proposals will realise a new neighbourhood where a substantial new residential and working population will share space with shoppers and those spending time in the new public spaces, many of whom will be neighbours. The design approach will provide health and wellbeing benefits for both new and existing residents and help address local anti-social behaviour issues. The neighbourhood will replace underdeveloped land which detracts from the Town Centre.
 - Environmental – The proposals will replace a hard-surfaced environment that was built out in an era with different values, with new buildings and spaces built to much higher contemporary standards. Addressing planning policy and other requirements will ensure the site responds to the challenges posed by climate change. The new buildings and landscaping have been designed to be environmentally sustainable in line with current best practice. Commercial elements will meet BREEAM Excellent and residential elements will achieve zero carbon, when considering both on-site measures and the carbon offset payment.

1. Introduction

- 1.1 This Planning Statement has been prepared in support of a planning application by Morrisons (Safeway Stores Limited) and Barratt London (BDW Trading Ltd) for the redevelopment of the Morrisons supermarket and PFS on Chalk Farm Road, Camden, for a mixed-use redevelopment providing new homes, commercial and community floorspace.

- 1.2 An application for full planning permission (and relevant demolition in a conservation area) has been submitted to the LBC (LBC) for the following development:

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 28,333 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.

- 1.3 The Application Site consists of the PFS and the main supermarket site and associated existing car parking. The Application Site also takes in the access road serving the supermarket and the adjacent residential development on Juniper Crescent; the road runs underneath the railway between the main site and the PFS.

- 1.4 The redevelopment proposals for the site have been conceived by three award-winning architectural practices:

- Allies and Morrison (AAM) : masterplanning and blocks B-D, E2 and F
- Niall McLaughlin Architects (NMA) : petrol filling station building
- Piercy & Company (PCO) : blocks A, E1

- 1.5 The purpose of this report is to consider the town planning issues relating to the proposed development. This report identifies key Development Plan policies and other material considerations relevant to the site and the proposed development and assesses the proposals against these.
- 1.6 This planning statement should be read in conjunction with the technical documents that accompany the planning application (listed in Appendix 1), along with the submitted drawings and plans and the Design and Access Statement (DAS).
- 1.7 Turley is pleased to submit this application on behalf of Morrisons and Barratt London. The proposals are for an exemplary new mixed-use neighbourhood in Camden Town Centre, which is referred to as the CGY development and forms part of the wider CGY area identified in LBC's draft Planning Framework. The scheme has been guided by the applicant's vision for the site, which is as follows:

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.

2. Application Site context

Introduction

- 2.1 The Application Site consists of the Morrisons supermarket and its associated car park, the Morrisons petrol filling station and the link road between these two parcels of land (which also serves properties at Juniper Crescent).
- 2.2 The site is within Camden Town Centre in an accessible location earmarked for growth. The site presents a significant opportunity for a redevelopment scheme which can optimise the use of currently under-utilised land in a central location. The site can thereby support LBC in delivering against a number of key policy objectives, relating in particular to housing supply, employment growth and town centre investment.

Site Location and Description

- 2.3 The site is located within Camden Town Centre, towards the northern and western edges of the centre. The site lies to the west of Chalk Farm Road, which runs north to south through Camden Town and onto Chalk Farm. Both the supermarket and petrol filling station are accessed from Chalk Farm Road. The site is a short walk from both Camden Town and Chalk Farm London Underground stations.
- 2.4 The site can be described in terms of 'parcels'. These can be seen in the DAS and within the plans contained in Appendix 2. The parcels are as follows:
- PFS parcel – accommodating the PFS and areas currently used for bus layovers;
 - Main site parcel – accommodating the foodstore, associated car parking spaces, the access road and bus stops and stands; and
 - Land under the railway line – accommodating a roadway and pavements, which are part of the site access road.
- 2.5 Table 2.1 sets out the site areas of the different parcels.
- 2.6 The main site is located to the north of the Regent's Canal and Camden Lock, with its associated markets, and to the west of markets and other commercial uses along Chalk Farm Road, including the Horse Tunnel Market, Camden Market and The Stables.
- 2.7 The main site is bound to the east and west by railway lines; the railway lines to the east run over the vaults of the Camden Stables Market with Camden Lock Market further to the south. To the north and south the supermarket site is bound by the social housing developments of Juniper Crescent and Gilbeys Yard. The Horse Tunnel is to the south of the site and runs from the Stables Market through Gilbeys Yard towards the Canal.
- 2.8 The PFS parcel fronts onto Chalk Farm Road, to the north, and is surrounded by the main site access road and associated link road, both of which are part of the one-way access and egress gyratory. The latter component runs around the rear (south) and west sides of the petrol filling station.

- 2.9 Within the wider context, the site is not far from Primrose Hill, to the south-west and slightly further away to the south and south-east are the Kings Cross and Euston Opportunity Areas (these latter two areas are within the Central Activities Zone).

Table 2.1: Site areas

Site parcel	Hectares	Notes
Main Site	2.8578	
PFS	0.3917	
Railway land	0.0146	
Net Site Area	2.64 ha	For purposes of calculation housing density and as defined by the London Plan.
<u>Red line area</u>	<u>3.264</u>	

Source: Area measurements by AAM

- 2.10 The main site parcel contains the Morrisons supermarket and associated car parking. The land within the main site is mostly hard-standing and there are no amenity areas available to the public other than a small informal grassed area to the south of the Store. Access to and through the Application Site is limited, as depicted in the DAS. The main site parcel is widely perceived by the local community as an 'island'; however, there are existing routes through the site which connect to the wider area.
- 2.11 The PFS parcel is occupied by an operational petrol filling station and associated forecourt. The PFS parcel also includes an access road, which accommodates existing bus and other vehicular movements.
- 2.12 The buildings within the Application Site are not of architectural or historical interest although the PFS parcel sits within the Regent's Canal Conservation Area and the Canalside Industry Archaeological Priority Area.
- 2.13 In terms of physical condition, the predominance of hard landscaping (together with some largely self-seeded greenery, including trees) in combination with hostile features, such as the long retaining wall leading from Chalk Farm Road, create a poor quality urban environment. The parcels are not and do not feel permeable. Pedestrian and bicycle connections through these two parcels are awkward, unappealing and not well served by the existing access points and movement routes across them.
- 2.14 A 'Camden Character Study' from 2015 (produced by Urban Initiatives Studio for Camden Council) identified the foodstore site as having the '*potential to remodel and intensify to create a more urban model befitting of the wider area*'. In terms of its current condition, the study noted:

'These buildings are incongruous with the built fabric and function as standalone objects that do not contribute to the streetscene or urban fabric.'

They are designed to be accessed by car and create a poor environment for walking and cycling. Their size and the 'dead space' around them creates a barrier to movement through a neighbourhood.'

Accessibility

- 2.15 The majority of the Application Site is highly accessible and benefits from an average Public Transport Accessibility Level (PTAL) (2011) rating of 5 although this does vary across the Application Site from 6a to 2 (where 6 indicates the highest level of connectivity). The 2021 PTAL forecast demonstrates that more of the site will benefit from a rating of 6a. The PTAL rating varies due to the layout of the site within its surrounding context; the PTAL rating is 6a to the north east and reduces to 2 to the west where the site lies adjacent to the railway tracks. The nearest underground stations are Chalk Farm (approximately 460m away) and Camden Town (approximately 780m away) which provide access to the northern line. Furthermore, the site is served by a number of bus routes.
- 2.16 Increased permeability through the site as a result of the proposed development will enable the entire site to be well-connected to public transport options in the surrounding area.

Ownership and Interested Parties

- 2.17 The Application Site includes:
- land wholly owned by the applicant;
 - land under the railway bridge, whose owner is unknown; and
 - a triangle of land at the eastern part of the Application Site, which lies directly above part of the Stables Market and where the applicant has rights to use the surface of the land only [the land below is owned by Market Tech as below].
- 2.18 Other parties also have an interest in the Application Site:
- Market Tech has an ownership interest in the Stables Market, below ground. Market Tech also owns the Interchange Building on land abutting the Application Site, to the east.
 - Sewers run through the Application Site, as depicted in the DAS.
- 2.19 Within the wider area:
- One Housing owns the residential developments of Gilbeys Yard, to the south, and Juniper Crescent, to the north.
 - To the north-west of the Application Site, Network Rail owns a triangular parcel of land between the mainline railway and the North London Line, which includes the closed Primrose Hill Station. This land is safeguarded for HS2 construction as is access along the main access road.

- Network Rail also owns the railway bridge which passes over the access road and includes structural elements which pass under the access road.

Site constraints

2.20 The site presents a significant development opportunity and yet is also affected by a number of challenging constraints, which are set out graphically within the DAS and include:

- underground utilities, including a mains sewer running underneath the main site;
- level changes within the site and in relation to the surrounding area;
- physical barriers (including roads and retaining walls);
- heritage assets in the area, including conservation areas, listed buildings and protected views;
- underground structures including vaults, and
- surrounding existing development including a significant residential population, the amenities of which must be protected.

2.21 Part 4 of the DAS sets out site constraints in further detail.

Site context

2.22 The surrounding area is mixed in nature due to its town centre location, including retail, commercial, leisure, residential and railway uses.

Camden Town

2.23 Camden Town has a commercial character and is predominantly defined by Camden High Street, Parkway and associated markets. The area is largely known for its variety, eclecticism and alternative culture. The built form is diverse, with buildings of a variety of ages, styles and scales, many of which have been altered and extended. Furthermore, many of the shopfronts have been replaced and the area has now established a reputation for vibrant façade decoration. More modern blocks have been introduced to the area in more recent years.

2.24 Camden Town is a major tourist destination. It is a vibrant centre famous for its unique markets, independent fashion and its music and entertainment venues such as the Roundhouse and Koko. It is characterised by an overlapping juxtaposition of uses and activities being home to many residents and to numerous businesses, notably media, cultural and creative industries. It is the borough's biggest centre and is designated as a Major Centre within the London Plan.

Regents Canal / Railway Land

2.25 Regent's Canal, part of the Grand Union Canal, winds its way through Camden forming a corridor of unique character. It is an important feature of historic and visual interest in the wider townscape. Following the decline of traditional canal-related commercial

activities it has been increasingly recognised as a valuable resource for leisure based activities. The views to and from this area vary and the contrast of townscape elements and the informal relationship between buildings and the canal make a significant contribution to the character of this area. Due to its inter-relationship with railway infrastructure and activities along with the associated historic industrial uses of this area, the built form is largely characterised by industrial buildings and structures dating back to the 19th and early 20th centuries.

- 2.26 The CGY site has been traditionally separated from its wider context by the legacy of the railways, the canal and operational structures. More recently new residential development, along with residential conversions of former industrial buildings, has occurred immediately adjacent to the site both to the north and the south.

Primrose Hill

- 2.27 Whilst urban in nature, the area is primarily residential and has a vibrant character of its own. The distinct quality of Primrose Hill is that it largely retains its homogenous mid-late 19th century architectural character comprised of terraced houses and local shops and boasts a “village” feel. Primrose Hill and Regent’s Park open spaces immediately adjoin this area and have a significant impact upon its character.

Site history

Nineteenth Century

- 2.28 The site was used in association with the railways that reached Camden Town in the 1830s. Buildings and connections associated with the railway uses are still visible. Below ground, tunnels, mainly under separate ownership, run under the railway tracks and relatively deep below ground within the main site. This man-made topography is a key part of the site’s character.
- 2.29 The main site parcel was raised above natural ground level so as to carry the main line railway over the Regent’s Canal. Goods and people had access to the city at this level. Servicing took place below this railway level, for example at the stable tunnels and the vaults associated with the winding engine.
- 2.30 The difference in levels between the railway and surrounding context is important to understanding the historic function of the Goods Station and railway complex and, in turn, its wider context. The level of the existing foodstore and its car park above Chalk Farm Road is a significant and important legacy of the area’s industrial past.

1990s redevelopment

- 2.31 In the early 1990s a large part of this former railway land was released for the development of social rented affordable housing at Gilbeys Yard and Juniper Crescent (managed by One Housing Group) and the foodstore and PFS now operated by Morrisons. The associated planning history for the Application Site is set out in Appendix 3.

Committed Developments and Future-Proofing

- 2.32 The Application Site was developed alongside the social rented affordable housing at Gilbeys Yard and Juniper Crescent. This housing is managed by One Housing Group.

The applicant recognises that these sites might at some stage be redeveloped, as envisaged within the draft Camden Goods Yard Planning Framework (2017).

- 2.33 In addition, there are a number of forthcoming developments which have recently been approved or are currently being developed within the surrounding area.

Hawley Wharf (also known as Camden Lock Village), NW1 8RP

- Ref. 2012/4628/P, Granted Subject to a S106 Agreement, September 2012 | Redevelopment of site to create a mixed use development comprising 8 new buildings between 3 and 9 storeys in height to provide, employment, housing, retail market, cinema, produce market, including change of use of 1 Hawley Road to educational, together with associated engineering works to create basements, plant and ancillary works, highways, public realm improvements, car and cycle parking and landscaping, tree removals, and associated works, following the demolition of all buildings across the site including single storey shopfront extensions at 1-6 Chalk Farm Road (excluding 1 Hawley Road and remaining structures at 1-6 Chalk Farm Road). (This application is accompanied by an Environmental Statement and is a redesign of a scheme that was refused on 4 May 2012 [Ref: 2011/4932/P]. Key revisions include: increase in size of public open spaces across the site, reduction in height/bulk/massing to some buildings, reduction in floor space, and new facade designs, particularly along the canal frontage).

This was subsequently amended by 2015/4562/P and 2016/3940/P and is currently being developed.

Camden Lock Market, Chalk Farm Road, NW1 8NH

- Ref. 2015/4774/P and 2015/4812/L, Granted Subject to a S106 Agreement, August 2015 | Demolition of existing timber Pavilion building, Middle Yard buildings and canopy structures and internal floors in East Yard. Construction of new Middle Yard building comprising basement and part three, part five storeys; single storey Pavilion building; new third storey on north-east of market hall building, bridge over the canal basin; deck area over Dead Dog Basin; and double pitched roof structure over East Yard. Change of use of existing East Vaults for flexible market uses (Classes A) and exhibition/events use (Classes D1 and D2); use of Middle Yard basement as exhibition/events venue (Classes D1 and D2); and use of the rest of the site for market uses (Classes A and B1). Ancillary works and alterations to existing structures and surfaces and other public realm improvements.

100, 100a and 100b Chalk Farm Road, NW1 8EH

- Ref. 2013/5403/P, Granted Subject to a S106 Agreement, September 2013 | Redevelopment of site to create a mixed-use development comprising 57 market flats (13x1beds, 28x2beds and 16x3beds), 6 affordable flats (3x3 bed social rented, 3x1 bed intermediate), new office, retail and restaurant units with associated works to highways and landscaping; following demolition of existing buildings and car park.

44-44a Gloucester Avenue, NW1 8JD

- Ref. 2015/1243/P, Granted Subject to a S106 Agreement, April 2015 | Demolition of existing buildings identified as Number 2 at the northwest corner of the site and Number 4 at the eastern corner of the site to provide a new ground plus 5 upper storey building along the north west part of the site and a ground plus 2 storey building at the eastern corner and refurbishment of existing building on site to create 40 residential units, employment floor area (Class B1a), car parking and landscaping within the courtyard with ancillary works.

This was subsequently amended by 2016/7089/P, 2016/5890/P, 2016/7074/P and 2016/2201/P.

The Roundhouse Theatre, Chalk Farm Road, NW1 8EH

- Ref. 2016/5760/P and 2016/5761/L, Resolution to Grant at Committee, May 2017 | The erection of a new building ranging from two to four storeys in height to accommodate new studios (Class D1) and offices (Class B1) within the service yard and the addition of a sixth storey to the existing 'container' office building for office accommodation (Class B1) together with installation of rail side storage containers and associated works within the service Description of development.

2.34 The following schemes have also been considered within the Cumulative Impact Assessment:

- Marine Ices, 4-8a Haverstock Hill & 45-47 Crogsland Road, NW3 2BL: ref. 2015/0487/P, Granted Subject to a S106 Agreement, December 2016;
- Vacant site adjacent to no. 11 Crogsland Road, NW1 8HF: ref. 2015/0921/P, Granted Subject to a S106 Agreement, July 2016;
- 5-17 Haverstock Hill, NW3 2BP: ref. 2016/3975/P, Planning Committee resolution to approve on 15 December 2016 however the S106 agreement is to be made before the decision can be issued;
- 1 Centric Close, NW1 7EP: ref. 2016/6891/P, Planning Committee resolution to approve on 15 June 2017; and
- 28 Camden Wharf, Jamestown Road, NW1 7BY: ref. 2017/1515/P, pending consideration.

3. Planning policy context

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Specifically, Section 38(6) states:

'If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

Development Plan

- 3.2 Development Plan documents relevant to the proposals comprise:

- the London Plan (2016);
- LBC Local Plan (2017), and
- LBC Policies Map (2016).

Material considerations

- 3.3 The following planning policy and guidance documents may be considered to form material considerations in the determination of the planning application:

- National Planning Policy Framework (2012)
- Planning Practice Guidance (live online resource, last updated 2016)
- Draft Camden Goods Yard Planning Framework (2017). The Council are in the process of finalising the framework based on the comments received. The final version of the framework is expected to be adopted by LBC during the summer of 2017.
- Camden Planning Guidance Supplementary Planning Guidance (CPG):
 - CPG1 Design (2015);
 - CPG2 Housing (2016);
 - CPG3 Sustainability (2015);
 - CPG4 Basements and Lightwells (2015);
 - CPG5 Town Centres, Retail and Employment (2013);
 - CPG6 Amenity (2011);
 - CPG7 Transport (2011); and

– CPG8 Planning Obligations (2011).

3.4 Supplementary Planning Guidance (SPGs) prepared by the Greater London Authority (GLA):

- Housing (2016);
- Shaping Neighbourhoods Accessible London: Achieving Inclusive Environment (2014);
- The Control of Dust and Emissions During Construction and Demolition (2014);
- Town Centres (2014);
- Character and Context (2014);
- Sustainable Design and Construction (2014);
- Shaping Neighbourhoods: Play and Informal Recreation (2012);
- Green Infrastructure and Open Environments: The All London Green Grid (2012); and
- London View Management Framework (2012, as amended).
- Draft Affordable Housing and Viability (2016)

3.5 Housing Density Study (2012) by Maccreanor Lavinton Architects, Emily Greeves Architects and Graham Harrington Planning Advice.

Policy designations

3.6 Figure 3.1 is an extract from LBC's Policies Map (2016). It indicates that the site is subject to the following designations:

- Camden Town Centre: This is defined as a Major Town Centre in the Local Plan and London Plan.
- Designated frontages: CPG 5 Town Centres, Retail and Employment designates the MS Parcel as a 'Secondary Frontage' and the PFS Parcel as a 'Sensitive Frontage' within Camden Town Centre.

3.7 The following designations only apply to part of the site:

- Regent's Canal Conservation Area: This designation is only applicable to the PFS parcel towards the north eastern part of the site.
- Canalside Industry Archaeological Priority Area: This designation is only applicable to the eastern corner of the site.

- Designated View 2A.2 Parliament Hill summit to the Palace of Westminster - Viewing Corridor: This runs through the centre of the site, approximately. The London View Management Framework (2012, as amended) indicates where building heights should be limited to a threshold above ordnance datum (AOD) across the relevant parts of the Application Site.

3.8 There are a number of conservation areas within the surrounding area, including:

- Harmond Street Conservation Area, to the north-east;
- Camden Town and Camden High Street Conservation Areas, to the south-east, and
- Primrose Hill Conservation Area, to the west and south-west.

3.9 The site has no listed buildings; however, there are a number of listed buildings located within the surrounding area, including:

- the Roundhouse;
- the Horse Hospital;
- Stanley Sidings;
- Primrose Hill Tunnels;
- the Horse Tunnels, stairs, vaults and Canal Basin;
- the Interchange building, and
- Camden Incline Winding Engine House.

3.10 The Application Site is not located in a designated Neighbourhood Area.

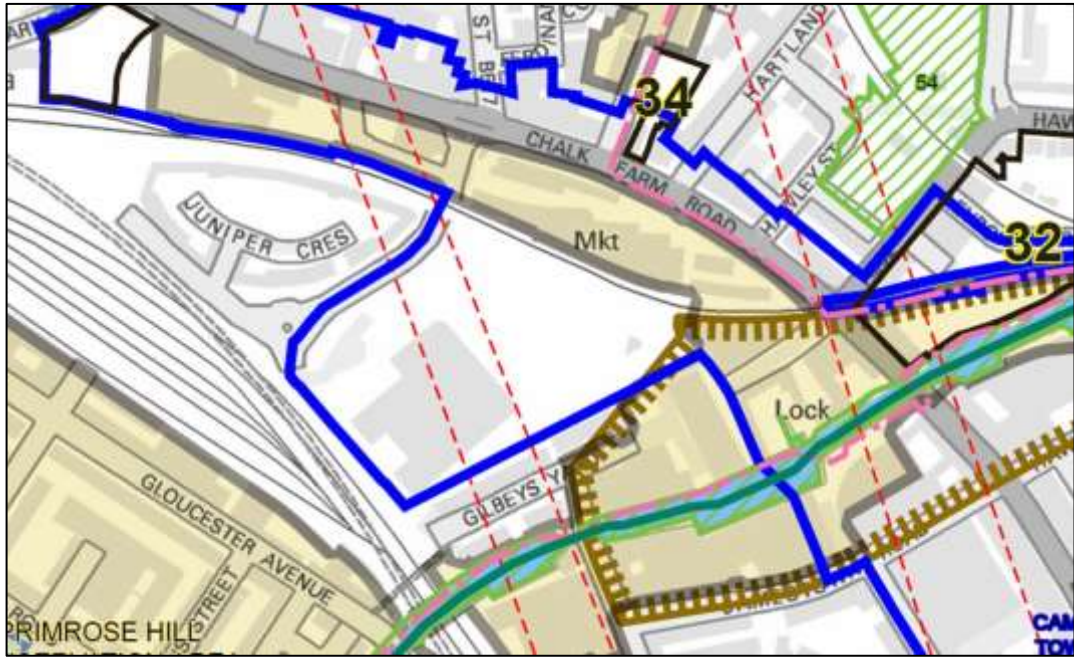


Figure 3.1: Extract from LBC Policies Map (2016)

National Planning Policy

- 3.11 Overarching planning policy guidance is contained within the National Planning Policy Framework and within the associated Planning Practice Guidance.
- 3.12 Central to the NPPF is the presumption in favour of sustainable development. With regards to decision taking, the NPPF confirms clearly at Paragraph 187 that:

'Local planning authorities should look for solutions rather than problems, and decision takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.'

- 3.13 The NPPF considers sustainable development to have three dimensions: economic, social and environmental. It is made clear that these elements should be achieved jointly and simultaneously and where this is demonstrable, development should be approved without delay.

Ensuring the Vitality of Town Centres

- 3.14 The NPPF identifies the importance of promoting the viability and vitality of town centres as the heart of communities. Furthermore, Paragraph 23 recognises that a range of uses are necessary to sustain town centres, including retail, leisure, commercial, office, tourism, cultural, community and residential development.

Residential Accommodation

- 3.15 The NPPF, from Paragraph 47 onwards, outlines the need to 'boost significantly the supply of housing' and 'deliver a wide choice of high quality homes' and 'create sustainable, inclusive and mixed communities'.

- 3.16 Paragraph 49 clearly sets out that 'housing applications should be considered in the context of the presumption in favour of sustainable development'.
- 3.17 In delivering a wide choice of high quality homes Paragraph 50 makes it explicit that local planning authorities should 'plan for a mix of housing based on current and future demographic and market trends'.

Affordable Housing

- 3.18 As part of the Government's objectives to significantly boost the supply of housing, a proportion of this is expected to be affordable housing to meet local needs (Paragraph 50). Where it has been identified that affordable housing is needed, this is expected to be provided on site unless an off-site provision of financial contribution can be robustly justified. To ensure viability, the costs of any requirements likely to be applied to development, such as affordable housing should when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable as set out in Paragraph 173.

Mixed Use Development

- 3.19 A core planning principle within the NPPF is to promote mixed use developments to encourage 'multiple benefits from the use of land'. It recognises the role of mixed use developments in promoting healthy communities in facilitating activity and interaction.

Building a Strong, Competitive Economy

- 3.20 As one of the key dimensions to sustainable development (Paragraph 7), the NPPF seeks to contribute to building a strong, responsive and competitive economy. Paragraph 20 notes that to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

Promoting Healthy Communities

- 3.21 The NPPF recognises the importance of social interaction and inclusive communities. Paragraph 69 notes that this includes safe and accessible developments including high quality public space, social, recreational and cultural facilities. Paragraph 70 further goes on to note that planning decisions should plan positively for the provision and use of shared space, community facilities (such as local shops) and other local services to enhance the sustainability of communities and residential environments.

Conserving and Enhancing the Historic Environment

- 3.22 Paragraph 126 of the NPPF acknowledges that new developments can make a positive contribution to the character and distinctiveness of the local historic environment of an area.
- 3.23 Paragraph 131 further goes on to note that in determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- The desirability of new development making a positive contribution to the local character and distinctiveness.

3.24 Local Planning Authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps, however they should also assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage assets, outweigh the disbenefits of departing from those policies.

Requiring Good Design

3.25 Paragraph 58 of the NPPF requires that planning policies and decisions should ensure that developments meet a number of criteria including the following:

- Function well and add to the overall quality of the area; and
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.

3.26 Whilst Local Planning Authorities should develop policies to help deliver high quality developments, Paragraphs 59 and 60 confirm that design policies should avoid unnecessary prescription or detail and should not stifle initiative through unsubstantiated requirements to conform to certain development forms or styles.

The London Plan (2016)

Town Centres

3.27 Policy 2.15 identifies that town centres are the main foci beyond the Central Activities Zone for commercial development and intensification, including residential development. In reiterating the objectives of the NPPF, the policy goes on to note that developments should sustain and enhance the vitality and viability of the centre and should:

- Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations;
- Support and enhance the competitiveness, quality and diversity of town centre retail, leisure, employment, arts and cultural;
- Promote access by public transport, walking and cycling;
- Promote safety, security and lifetime neighbourhoods; and
- Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure.

3.28 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.

Residential Accommodation

- 3.29 Policy 3.3 and 3.4 recognise the pressing need for more homes in London and seek to optimise the delivery of residential accommodation across the boroughs. Housing remains a priority within the London Plan and policies seek to increase housing supply and support the delivery of 42,000 new additional homes across London annually. Within this target, Camden is allocated to provide 889 new homes per year over the ten year period as a minimum.

Affordable Housing

- 3.30 Policy 3.8 notes that the provision of housing should provide a choice of homes that are affordable and of different sizes and types in the highest quality environments. The Mayor seeks an average of at least 17,000 more affordable homes per year in London with a provisional split of 60% for social or affordable rent, and 40% for intermediate rent or sale (Policy 3.11). This is also in support of Policy 3.9 which seeks promotes a mixed and balanced community by tenure and household income across London.

Commercial Development

- 3.31 Policy 4.1 seeks to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost. The London Plan aims to ensure that London continues to excel as a world capital for businesses, while also supporting the success of local economies and neighbourhoods in all parts of the capital.

Urban Design and Place Shaping

- 3.32 The London Plan supports developments that are sensitive to the quality and function of neighbourhoods and places, access, heritage, local character, landscapes, inclusive design, safety, security and resilience, green infrastructure, air quality and biodiversity that contribute towards making London a special place and improve quality of life.
- 3.33 It promotes creating diverse, strong, secure and accessible neighbourhoods. Section 7 of the London Plan suggests that developments should contribute to people's sense of place, safety and security, and that the buildings and spaces should help reinforce the character and legibility of the neighbourhood. Furthermore, it encourages developments to be inclusive to all with a focus on providing high quality public realm.

Historic Environment and Landscapes

- 3.34 London's views, heritage assets and historic environment make a significant contribution to the city's culture. Developments are encouraged to be sympathetic to surrounding heritage assets and conservation areas by taking a considered approach to the form, scale, materials and architectural detail of a development. Furthermore, the London Plan acknowledges that new development can often make a positive contribution to the views and be encouraged.

Sustainable Development

- 3.35 The Mayor expects all developments to make the fullest contribution to the mitigation of climate change. Section 5 of the London Plan seeks to reduce the emission of carbon

dioxide, primarily by reducing emissions from new developments and supporting developments of low carbon energy infrastructure to produce energy more efficiently and to utilise energy from waste.

Local Policy Climate

- 3.36 The emerging Camden Goods Yard Planning Framework covers almost 9 hectares and is located in Camden Town Centre. It identifies the potential of the site and the surrounding area for redevelopment and intensification to provide a significant number of homes, commercial space, public realm, open space and community facilities.
- 3.37 The framework sets out the Council's vision and key objectives for this part of the borough, acknowledging the potential for this area to come forward for significant redevelopment, and providing a coordinated and strategic approach to facilitate this. The vision includes creating a new neighbourhood that promotes health and well-being, a confident identity, an inclusive mixed-use place, exemplary urban design and excellent architecture, a place that is well connected and accessible to all, an area that celebrates its rich heritage, an environment that feels safe and welcoming by day and night, and a green place that is environmentally sustainable and responsible.
- 3.38 The Council seeks to maximise the capacity of the area for development to achieve a density that is appropriate to the Town Centre location whilst preserving the character and views in and out of the area, by identifying a number of issues and constraints as well as the opportunities to address these.
- 3.39 LBC's Local Plan was adopted in July 2017. During design development the emerging scheme was assessed against the now replaced Core Strategy and Development Policies document as well as the, then emerging, Local Plan. This Statement reviews the proposals against the Local Plan.

4. Description of development

- 4.1 The proposed description of development (this has been agreed in principle with LBC):

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 28,333 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.

Site area

- 4.2 There are a number of areas within the overall 'red line' Application Site boundary and these are set out below. Plans showing the areas below are set out in Appendix 2.

Table 4.1: Site areas

Site parcel	Hectares	Notes
Main Site	2.8578	
PFS	0.3917	
Railway land	0.0146	
Net Site Area*	2.64 ha	For purposes of calculation housing density and as defined by the London Plan.
<u>Red line area</u>	<u>3.264</u>	

Source: Area measurements by AAM

Residential development

- 4.3 The proposed development will provide 573 new homes, with a range of unit sizes and tenures. The mix of new homes proposed is set out in the table below:

Table 4.2: Proposed new homes - unit mix

New homes	Studio	1 bed	2 bed	3 bed	4 bed	Sub-total
AR	0	23	29	42	8	102
Intermediate	0	46	36	0	0	82
Market	62	140	146	41	0	389
Sub-total	62	209	211	83	8	<u>573</u>
% mix	10.8%	36.5%	36.8%	14.5%	1.4%	

Source: 1095_CamdenGoodsYard_Current Mix_170704_rev.P2

Affordable housing

- 4.4 The proposals include the provision of 35% affordable housing, as set out in the table below. Tables 4.3 and 4.4 set out the size mix of these units by tenure in relation to the number of bedrooms.

Table 4.3: Affordable housing tenures

Affordable tenure	Percentage	Notes
All affordable homes	35% by floorspace	NIA floorspace
	39% by hab room	
	32% by unit	
Affordable Rent	60% of total AH	by NIA floorspace
Intermediate Rent	40% of total AH	by NIA floorspace

Source: 1095_CamdenGoodsYard_Current Mix_170704_rev.P2

Table 4.4: Unit size mix by tenure (floorspace)

	Studio	1 bed	2 bed	3 bed / 4 bed	Notes
Market homes	10%	29%	45%	16%	
Intermediate Rent		46%	54%		
Affordable Rent		14%	26%	60%	

Source: 1095_CamdenGoodsYard_Current Mix_170704_rev.P2

Table 4.5: Unit size mix by tenure (units)

	Studio	1 bed	2 bed	3 bed / 4 bed
Market homes	16%	36%	38%	11%
Intermediate		56%	44%	
Affordable Rent		23%	28%	49%

Source: 1095_CamdenGoodsYard_Current Mix_170704_rev.P2

Density of new homes

- 4.5 The London Plan Sustainable Residential Quality density matrix (Table 3.2 of the London Plan) and Policy 3.4 (Optimising housing potential) sets out guideline densities and states that *'development should optimise housing output for different types of location within the relevant density range'* subject to consideration of the site context, local character and Public Transport Accessibility Levels.
- 4.6 The site has a varied PTAL within the range of 6a – 2; however, site is highly accessible and benefits from an average PTAL rating of 5. The 2021 PTAL forecast demonstrates that more of the site will benefit from a rating of 6a. The PTAL rating varies due to the layout of the site within its surrounding context; the PTAL rating is 6a to the north east and reduces to 2 to the west where the site lies adjacent to the railway tracks. The nearest underground stations are Chalk Farm (approximately 460m away) and Camden Town (approximately 780m away) which provide access to the northern line. Furthermore, the site is served by a number of bus routes.
- 4.7 Given the average PTAL of 5 and the higher PTAL levels within the site, for the purposes of the London Plan density matrix the range of 4-6 is considered the appropriate range to apply.
- 4.8 The site is within Central London (for the purposes of the density policy) given that the site lies within Camden Town Centre, which is a Major Centre (London Plan Table A2.1). This has been confirmed in pre-application discussions with the GLA (para. 32 of GLA pre-application advice letter ref. D&P/4158 dated 25 January 2017 – refer to Appendix 4).
- 4.9 On this basis the relevant GLA guideline density range for the site is 215-405 units and 650 – 1,100 habitable rooms per hectare.
- 4.10 Several density calculations are set out below for the abundance of transparency. The site areas below consist of the following:
- Main Site Area – the area of the whole supermarket parcel including access road.
 - Net Site Area – the area of the whole supermarket site up to the (pavement) line of the proposed access road.

- Net Residential Area - the Net Site Area reduced in proportion to the amount of non-residential floorspace on the Main Site.
- The proposed density range, based on these calculations is 200-323 homes per hectare and 537-988 habitable rooms per hectare. The figures of 217 units and 581 habitable rooms follows the methodology set out within the London Plan paragraph 3.31. The figures of 323 units and 864 habitable rooms follows the worked example set out in the *Housing Density Study* (2012) by Maccreanor Lavinton Architects, Emily Greeves Architects and Graham Harrington Planning Advice.

Table 4.6: Density of new homes

		Homes/ha	HR/ha	Notes
Homes	573			
Hab rooms	1535			
Main Site Area	2.86	200	537	
Net Site Area	2.64	217	581	
Net Residential Area*	1.78	323	864	
NRA excl. foodstore car park	1.55	369	988	
GLA guideline		215-405**	650-1,100	

Source: 1095_CamdenGoodsYard_Current Mix_170704_rev.P2

* Net Residential Area as above is the Net Site Area reduced in proportion to the amount of non-residential floorspace on the Main Site.

** The proposed homes will have on average 2.7 habitable rooms per hectare.

Commercial development

Existing floorspace

- 4.11 The current site includes the Morrisons supermarket and associated car parking, the Morrisons petrol filling station and associated forecourt and forecourt shop.

Table 4.7: Existing floorspace

Use	SQ M
Foodstore	7,809 GEA
PFS	125 GEA*excluding the PFS canopy)
Total	7,934

Source: Measurements by AAM

*PFS kiosk only

Proposed floorspace

- 4.12 The proposed development comprises eight new buildings. The uses within those buildings are summarised below. Table 4.7 below sets out the overall floor areas within each proposed use.
- 4.13 The foodstore and PFS will both occupy the lower parts of buildings, with other uses provided above. The scheme is carefully designed to address the Application Site's topography. This means, for example, that whilst the foodstore will have an open frontage at high street level on its north-western elevation (facing Chalk Farm Road) it will be for the most part subterranean.
- 4.14 The individual buildings have the following non-residential uses, in summary:

Block A

- workspace at ground floor facing Makers Yard
- retail at ground floor
- offices at first and second floor

Block B

- workspace at lower ground (under linear park – Railway Park) and in Block B facing Camden Yard
- workspace at ground
- retail at ground
- foodstore retail at lower ground, ground and mezzanine, including café, community space and public toilets, servicing and warehousing at lower ground
- foodstore parking at basement and lower ground
- offices at ground and first floors

Block C

- workspace at ground floor facing Interchange Yard
- retail unit at ground floor
- communal residents' amenities: gymnasium at lower ground and ground, library and lounge at ground floor

Block D

- retail at ground floor fronting Southampton Square
- community centre at ground floor facing Interchange Yard

Block E1

- offices for concierge and site management

Block F

- workspace at ground floor and first floor facing block A
- office facing Block B at ground floor and first floor
- retail at ground floor facing blocks A and B

Petrol filling station (temporary)

- foodstore at ground and first
- offices on upper storeys

Petrol Filling Station (permanent)

- PFS kiosk at ground floor
- retail at ground floor office at ground – fifth floors
- café and restaurant use within taller element, with winter garden above

Table 4.8: Proposed commercial floorspace (GEA)

Use	SQ M	Breakdown	
A1-A4	21,993	Foodstore incl. car park, service area etc.	19,963
		PFS	1,243
		Main site	787
Office	12,981	PFS	8,114
		Main Site	4,867
Affordable office (B1a)	565		
Workspace	779		
Sui Generis	3,184		
Community	86		
Total	39,588		

Source: 1095_CamdenGoodsYard_Current Mix_170704_rev.P2

Temporary floorspace

- 4.15 The PFS Parcel will host a temporary Morrisons foodstore, PFS forecourt shop and a proportion of the final proposed amount of office space, before being given over entirely to the office space and PFS use, including forecourt shop, in its permanent condition. Table 4.8 below sets out the details of this temporary arrangement.

Table 4.9: Temporary PFS Parcel floorspace

Use	SQ M
Foodstore	2,258
PFS forecourt shop	53
Office	6,192
Total	8,503

Source: 1095_CamdenGoodsYard_Current Mix_170526

Affordable workspace and community space

- 4.16 The proposals include an element of affordable B1(c) workspace together with community facilities and facilities that are accessible to the public, such as public toilets. Details are set out in the table below.

Table 4.10: Affordable workspace and community facilities GEA

Description	GEA floorspace	Notes
Affordable workspace	565 sq m	
Urban farm with ancillary commercial and community uses (Block B)	1,298 sq m	
Community centre (Block D)	86 sq m	
Evening toilet	Nominal	
Winter Garden (PFS)	329 sq m	

Source: 1095_CamdenGoodsYard_Current Mix_170526

Urban growing space

- 4.17 The proposals include glasshouses and associated structures and open space on the roof of Block B to be used for food growing.
- 4.18 This is described within the description of development as:

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

4.19 Currently, the operator for the community growing space is anticipated to be the Camden Chilli Farm operated by Something & Son. The chilli farm is envisaged as a place for workers, tourists and residents to escape the hustle and bustle and relax in the UK's largest rooftop urban farm. The description of development above is intended to provide a degree of flexibility should the occupier or detailed operational model alter. The farm will include the following uses and activities:

- Events space
- Bar/café
- Kitchen
- Glasshouses for growing chillies
- Outdoor growing areas

4.20 The chilli farm will provide a community offer, which at this stage is anticipated to include the following activities:

- A programme of events throughout the year.
- Relaxation and socialising areas, including roof top bar and café.
- A community garden integrated around/in the commercial growing area for local residents to grow their own produce.
- Programmed talks and tours for local schools to visit the urban farm and learn about the health and environmental benefits from urban agriculture.
- 'Pick Your Own' days, when the public are allowed access to the commercial farm and to pick chillies to take home.
- Training volunteers to in plant care, in return for harvesting assistance.
- Internships to local 16-25 year olds on Something & Son's 'Grow Yourself' programme, which encourages careers in food production and promotes urban agriculture. In similar projects such as FARM:shop, we have almost entirely sourced employees from existing or previous volunteers. An apprenticeship scheme in conjunction with the Kentish Town City Farm will be considered after the first annual cycle is complete.
- Partnerships with adult learning programmes to provide work experience, training and employment opportunities.
- Partnerships with London's growing network of city farms to collaborate on events and open days.
- Public and private intimate events to encourage community involvement in local projects across the borough.

- Food festivals promoting local food producers and consumers
- 4.21 The chilli farm will run an events programme, which is likely to focus on the flexible central space in the largest greenhouse and is envisaged to include:
- Supper clubs and pop up dinners
 - Specific chilli-themed food events
 - Educational visits for schools and colleges
 - Private parties
 - Product launches
 - Community events and activities
 - Urban Agriculture courses and social events
 - Business meetings and away days
 - Council events and meetings
- 4.22 The operation of the urban growing space will be carefully managed. It may be appropriate for LBC to secure an operational management plan by condition.

Residential population yield

- 4.23 We have used the GLA's population yield calculator to calculate the estimated residential population that will live within the new homes, including the expected child yield. We have selected the 'central London' option.

Table 4.11: Population yield from development

	Market	Social	Total
0-3	21.1	62.2	83.3
4-10	20.7	66.7	87.4
11-15	5.8	40.8	46.6
16-17	2.5	17.2	19.7
18-64	640.8	295.4	936.2
65+	15.3	6.9	22.2
Total	<u>706.2</u>	<u>489.2</u>	<u>1195.4</u>

Source: GLA Population Yield Calculator V2 accessed 1 June 2017

- 4.24 In addition, within the ES Chapter 6 (socio-economics) the population yield is calculated by house type as follows.

Table 4.12: Child yield

	Market	Affordable Rented	Intermediate Rented	Total
Children (aged 0-18)	43	123	50	216
Primary Children (aged 5-11)	17	48	19	84
Secondary Children (Aged 12-16)	12	35	13	60
Population (All Ages)	762	200	161	<u>1124</u>

Sources: Socio-Economic ES chapter produced by Turley Economics, 2011 Census – Persons per bedroom, Camden Survey of New Housing (2002-08)

- 4.25 An alternative methodology is provided in section 9.20 of this planning statement based on a combination of the Camden Survey of New Housing (2002-08) and the requirements of CPG 6 Appendix B.

Working population yield

- 4.26 The supermarket and petrol filling station currently employ 58 full time jobs and 153 part time jobs, as advised by Morrisons. This equates to approximately 161 FTE jobs. The replacement supermarket and PFS uses are anticipated to generate the same amount of employment.
- 4.27 The working population yield of the development has been calculated based on a number of methodologies set out in the Method of Assessment section of the Socio Economic ES chapter produced by Turley Economics.

Table 4.13: Operational employment yield

Proposed Employment	Direct Gross FTE Jobs
Demolition and Construction Works	130
Temporary Store	81
Residential Facilities	11
Retail	129
Office	869
Workspace	14
Morrisons	161
Total (Permanent)	1184

Source: Socio-Economic ES chapter produced by Turley Economics

- 4.28 On the basis of these projections, the total combined residential and working population associated with the development is anticipated to be 2,283 people. It should however be noted that a proportion of the residential population is likely to travel elsewhere to work during the day and the working population will follow typical working hours patterns. In addition, there will be visitors to the various buildings, uses and spaces on the site.

Built form

- 4.29 The proposals comprise of eight buildings. The height range of these buildings is set out below.

Table 4.14: Storey heights by Block

Block	Lower	Upper	Notes
A	11	14	
B	6	7	Plus glasshouses
C	8	10	
D	1	5	
E1	11	11	
E2	3	5	
F	5	9	
PFS		6	The winter garden contains a taller element extending above the fifth floor

Landscaping and public realm

- 4.30 The proposals have been designed with a significant amount of public realm, including open spaces and permeable routes through the site, connecting with the site surroundings.
- 4.31 The open space provision has been classified and set out in the table below.

Open space provision

Table 4.15: Open space provision

Type	Quantity (sq m)	Notes
Amenity open space	7,257	
Natural green space	3,434	
Play space	1,129	
Outdoor sports	108	
Community growing	368	Not including rooftop urban farm

Source: Landscape strategy, Gillespies

Transport

Parking

- 4.32 The development will be predominantly 'car free' with the exception of foodstore parking and wheelchair accessible parking for the residential uses.
- 4.33 The existing foodstore parking will be reduced from 425 to 300 spaces in line with aspirations to reduce car use within the development whilst striking an appropriate balance with consumer demand and operational requirements.
- 4.34 The scheme will be the subject of a Travel Plan supporting the operation of the proposed uses which will be secured through the s106 legal agreement.

Table 4.16: Car parking

Car parking location	Existing	Proposed	Notes
PFS		4	
Temporary PFS condition	-	61	4 accessible spaces
Foodstore	425	300	15 existing accessible spaces
Residential	0	20	10 accessible bays and 10 accessible bays on-street
Total	425	324	

Table 4.17: Proposed cycle parking

Parking location	Existing		Proposed		Notes
	<i>Visitor</i>	<i>Long-stay</i>	<i>Visitor</i>	<i>Long-stay</i>	
PFS			16	46	Long stay is for PFS office
Foodstore	48				
Residential			-	912	Includes 84 accessible 64 general use visitor spaces (below column)
Main site			64	73	Long stay for commercial space 64 general use visitor spaces

Cycle hire	32
------------	----

Transport Assessment, Ardent Consulting Engineers (June 2017)

5. Pre-application engagement

- 5.1 This section of the report provides an outline and summary of the extensive pre application engagement that has taken place in respect of the proposed redevelopment of the site in advance of the application submission.
- 5.2 Section 6 includes a summary of design development, which indicates how the proposals have development in response to this feedback.

Engagement with LBC

Pre-application discussions with officers

- 5.3 The applicant and design team have undertaken extensive pre-application engagement with officers at LBC. This has been structured around a Planning Performance Agreement (PPA), which was signed between Barratt London and LBC in October 2016.
- 5.4 This has served to provide a framework for regular meetings from the onset of the project through design development and up to submission of the application. LBC officers within planning and a range of specialist areas have been involved in the development of the scheme to ensure that the proposals align with the policies and objectives of the council.

Developers Briefing to Committee Members

February 2017

- 5.5 The proposals were presented to the following committee members on 6 February 2017: Cllr Heather Johnson, Cllr Roger Freeman, Cllr Phil Jones, Cllr Sue Vincent, Cllr Danny Beales, Cllr Adam Harrison, Cllr Abi Wood, Cllr Lazzaro Pietragnoli (ward member), Cllr Richard Olszewski, Cllr Richard Cotton. Cllr Pat Callaghan and Cllr Abdul Quadir were also present.
- 5.6 Discussion took place in respect of the proposed land use, urban design, transport, amenity and engagement considerations. A summary of the meeting and associated feedback is included within Appendix 5 of this statement.

May 2017

- 5.7 The proposals were presented to the following committee members on 16 May 2017: Cllr Heather Johnson, Cllr Phil Jones, Cllr Danny Beales, Cllr Abi Wood. The proposals were briefly discussed with Cllr Pat Callaghan in advance of the meeting.
- 5.8 Discussion took place with regards to land use, urban design, commercial offer, amenity, sustainability, transport and permeability. A summary of the meeting and associated feedback is included within Appendix 5 of this statement Engagement via LBC

Design Review Panel (DRP)

DRP #1 - 16 September 2016

- 5.9 The scheme was presented to its first DRP on 16th September 2016.

5.10 The views of the Council can be summarised as follows:

- The site has limited access but has huge potential to create a new neighbourhood; a place for living and working as well as shopping but that which is distinct from the night time economy at Camden;
- A clear vision and understanding of character of spaces should drive the design.

5.11 The views of the DRP can be summarised as follows:

- The site has great potential for redevelopment as a mixed use neighbourhood; it demands an excellent design response;
- Further thought should be given to the routes, streets and spaces within the proposed masterplan and that massing of buildings that frame them;
- Landscape should be a driving force in the layout of the proposed masterplan in order for buildings to be designed to frame public and green spaces;
- The type and location of retail needs to be considered to ensure that the public spaces are not dominated by the anchor food-store.
- Panel welcomes the aspiration to create a new mixed use neighbourhood at the site.

DRP #2 - 2nd December 2016

5.12 The scheme presented to the second DRP responded to comments received as part of the initial DRP (as outlined above).

5.13 The views of the Council can be summarised as follows:

- Officers broadly support the layout of the scheme;
- Three key issues considered:
- The character of the development – a clearer strategy is needed for the design and use of key spaces;
- Connections and routes through the site – requires further thought to resolve tension between opening up the site and creating a high quality residential environment;
- Massing – the high density nature of the proposals raises questions regarding the overall massing and heights of individual buildings within the proposed masterplan.

5.14 The views of the DRP can be summarised as follows:

- Development density and massing of the site as currently proposed is too high;

- Consideration should be given to levels of surveillance and hierarchies of public and private spaces.
- Panel suggest a shoulder height of 5 to 7 storeys, rising to 9 storeys in one of two key locations would be more appropriate in this location.
- Encourage a greater focus on how the scheme can be a positive contributor in the visual landscape;
- Panel welcome improvements to vehicular access, and would support a more integrated approach to pedestrian circulation as the access strategy is developed in more detail;
- The petrol station provides relief from the busy Chalk Farm Road.
- The number of housing units, tenure mix and the impact these have on child density need to be established to ascertain what facilities are required.

DRP Site Visit – 27 March 2017

- 5.15 DRP fact finding visit to site and surroundings accompanied by Officers and Project Team Members.

DRP #3 – 31 March 2017

- 5.16 The scheme was presented to its third and final DRP at an all-day session held at the offices of Allies and Morrison. The session was chaired by Peter Studdert (Co-Chair of the DRP and independent town planning adviser) for the first time which allowed the opportunity to review the scheme from first principles as well as address those issues identified in earlier sessions.

- 5.17 The updated views of the Council expressed at the start of the session can be summarised as:

- expecting a high quality scheme rooted in the site's history yet forward looking and equipped to meet future needs
- broad support of the layout
- scheme developing well with much progress since the last DRP in terms of heights; shoulder heights; massing and architectural quality
- further work needed on bringing landscape and architecture together to create a sustainable character as a mixed use community with a strong sense of community
- a route alongside the eastern railway is asked for
- potential conflicts between night activities and residential use need resolution.

- 5.18 The panel was asked for its reflections on character, height and locations, quality of space and routes, and architecture.

5.19 Following the presentation the views of the DRP can be summarised as:

- the scheme being a very significant development for Camden Town
- it is large and important and requires a quality of planning that responds to the scale of the opportunity
- much work has been undertaken since the last review resulting in very positive changes
- the high quality of attention being applied is clear
- the emerging designs promise to create a development with distinctive character
- broadly supportive of overall building heights with suggestions for adjustments to specific buildings
- the PFS, Blocks B and F are all progressing well
- the most significant changes to be addressed relate to the green space and landscape components of the proposed masterplan and require a strategic review considering safety, liveability and quantum
- Block C requires remodelling so as not to dominate public spaces to the north
- the height Block E1 needs to be considered in the context of potential overshadowing of Southampton Square
- the central route through the site should be distinguished from other routes so as to ensure the possibility of night-time pedestrians being drawn into residential areas.

5.20 The panel looked forward to commenting on the scheme at planning application stage.

Development Management Forum

5.21 The proposals were presented to Camden's Development Management Forum on the following dates:

- 5 December 2016; and
- 9 May 2017.

December 2016

5.22 At the 5th December 2016 meeting the following items were the main considerations/ concerns discussed in respect of the scheme:

- Height, sunlight and daylight, overlooking;
- Anti-social behaviour;
- Impact on transport, NHS and schools;

- Construction management;
- Parking;
- Other issues: CIL, compensation for residents and the need for further consultation.

5.23 The following comments were made from the project team in response to the above items:

- The team are still exploring heights but planning policy is to optimise the development of well-connected town centre sites which leads to additional height;
- Proposals are looking to incorporate 24 hour toilets in to the new petrol station;
- Anticipate that natural surveillance would reduce levels of anti-social behaviour and the applicant would work with planning officers on this issue. Routes and open spaces would be overlooked but would consider CCTV as part of proposal;
- 300 car parking spaces are proposed in Morrisons car park (a reduction on existing 425 spaces) and that the new housing will be car free with 10% disabled car parking spaces;
- Construction period anticipated to be 3 years and that a Construction Management Plan (CMP) would be agreed before commencement. The CMP would take into account neighbours amenity and will cover noise/dust etc. Resident hotlines and liaison would be provided.

May 2017

5.24 At the 9th May 2017 meeting the following items were the main considerations/ concerns discussed in respect of the scheme:

- Impact on local services including schools and health services;
- Density/ height;
- Temporary loss of Petrol station and Supermarket;
- Response to draft Planning Framework
- Night time safety;
- Increase in population and tenure mix;
- Levels and site accessibility
- Public transport and cycling;
- Playspace provision
- Public engagement

- Construction impact
- Transport impacts
- Long term site maintenance
- Trees

5.25 The following comments were made from the project team in response to the above items:

- Calculations have been carried out on the impact from the proposal increase and are confident that the new population can be accommodated by existing facilities. Payments will be made through CIL to ensure surrounding facilities are equipped. If there is a deficit then the developer will pay for increased facilities. There is room on site to accommodate facilities such as a new surgery, if necessary.
- Overall density of the site is in accordance with the Mayor's range, especially for site with high PTAL;
- The site is a town centre location where growth has to happen to meet housing targets;
- The petrol filling station would be unavailable for trading for a period of approximately 4 years from the start of works;
- Increased natural surveillance so the area will automatically be safer. The residential units will have 24 hour concierge and security patrol.
- The tenure mix is mainly 1 and 2 beds which targets the high demand in Camden but a range of tenures is included;
- The team have worked closely with the Council's access officers to ensure whole site is accessible as possible. Have made the site flat as possible with accessible routes. Where necessary the level differences are overcome by use of lifts but there is a fully accessible longer route as a fall back;
- Play space is woven throughout the entire scheme.
- The above matters are considered within this Planning Statement

Statutory organisations – TfL, GLA, Historic England, GLAAS

Transport for London

December 2016

5.26 A pre application meeting was held with TfL on 9 December 2016. Pre application feedback in respect of the scheme from TfL was issued in a letter dated 20 December 2016 and is appended to this statement.

May 2017

- 5.27 A further pre application meeting took place on 24 May 2017 and follow up written feedback was issued to the applicant on 8 June 2017.
- 5.28 In the written feedback received, TfL make a request for a Road Safety Audit (RSA) to be carried out of the current design options, and for the modelling data inputs to include all additional traffic which would be generated in the future temporary and permanent development flow scenarios, including cycling, construction traffic and service access arrangements for each stage of the development.
- 5.29 TfL feel reasonably confident that a safe and pleasant solution, balancing the needs of road users appropriately in accordance with London Plan policy, can be achieved at the Juniper Crescent/Chalk Farm Road junction to support the new development.
- 5.30 TfL have would like to understand how rail replacement bus standing (currently on the slip road) will be re-provided in situ or elsewhere or how this could work using the new bus access arrangement.
- 5.31 TfL have noted a requirement for facilities to be provided for taxi pick up/drop off, especially adjacent to the new Morrison's supermarket.
- 5.32 TfL supports the car-free approach to the residential and non-supermarket commercial uses in the proposed development, in accordance with London Plan policies 6.11.

Greater London Authority (GLA)

December 2016

- 5.33 A pre application meeting took place with the GLA on 13 December 2016. Written feedback from the GLA was received on 25 January 2017. The scheme presented at the meeting comprised the provision of approximately 611 residential units, 16,250sqm of B1 floorspace including affordable workspace plus a replacement Morrisons foodstore and petrol filling station.
- 5.34 In summary the feedback concludes that the principle of the proposed residential and employment intensification of the site, including re-provision of the existing foodstore and petrol filling station and the potential provision of a new local sports facility that will also help improve permeability and legibility in the area is supported.
- 5.35 The feedback notes that further work on the overall building layout and the public space design is required in addition to further discussion regarding affordable housing, and other matters such as housing mix, inclusive design, sustainable development and transport should be addressed as part of any future planning application submission.
- 5.36 The pre application feedback received from the GLA is appended to this report (Appendix 4).

Historic England

March 2017

- 5.37 On 14th March 2017 Historic England issued their formal pre application advice in respect of the redevelopment proposals. In summary Historic England welcome the redevelopment of the site, which currently detracts from this part of Camden Town and broadly support the proposed masterplan, its mix of uses and the general design approach. Historic England considers that some taller elements of the scheme will have impacts that go beyond the immediate development area such as on parts of the Primrose Hill Conservation Area, Regent's Park (Grade I Registered Park) and the setting of the Grade II* listed Roundhouse. However, Historic England considers such impacts to be modest and could be outweighed by public benefits in accordance with paragraph 134 9of the NPPF.
- 5.38 Historic England state that when consulted formally on the submitted application they will advise for Camden to weigh the harm against the public benefits and determine the application on this basis.

Key stakeholders, Non-Statutory organisations and individuals

- 5.39 A number of meetings have been held with a variety of stakeholders in respect of the proposals as they have been evolving and in advance of submission of the application. A schedule of such meetings is outlined below:

- 18th May 2016 meeting with Cabinet members;
- 6 July 2016 meeting with Primrose Hill Councillors;
- 13th July 2016 meeting with Camden Railway Heritage Trust;
- 13th July 2016 meeting with Camden Town Unlimited;
- 19th July 2016 meeting with Primrose Hill Conservation Area Advisory Committee;
- 22nd July 2016 meeting with Primrose Hill Community Association;
- 26th July 2016 meeting with Harmood, Hartland Clarence Residents Association;
- 1st August 2016 meeting with the Roundhouse;
- 1st August 2016 meeting with Regents Canal Area Advisory Committee;
- 10th August 2016 meeting Mark Neal (resident at Gilbeys Yard);
- 23rd August 2016 meeting with Friends of Regents Canal;
- 24th August 2016 meeting with Gloucester Avenue Association;
- 12th September 2016 meeting with Castlehaven Community Association: Planning and Licensing Committee;

- 7th November 2016 meeting with Councillors Jones and Callaghan;
- 10th November 2016 meeting with Councillors Kelly, Quadir and Pietragnoli;
- 16th November 2016 meeting with Regents Canal Conservation Area Advisory Committee;
- 30th November 2016 meeting with Primrose Hill Conservation Area Advisory Committee;
- 1st March 2017 meeting with Primrose Hill Conservation Area Advisory Committee.

Camden Goods Yard Working Group

- 5.40 The project team presented the emerging proposals to the Working Group on two occasions in the presence of LBC Officers. The first meeting on 27th March 2017 was chaired by Cllr Wood and the second, on 6th June 2017, by Cllr Pietragnoli. In addition a further meeting was held on the 18th April as referred to within the SCI.
- 5.41 On each occasion there was a detailed explanation of the evolving scheme focusing on benefits, impacts and mitigations along with a robust questioning of proposed masterplan concept, development principles and scheme content.
- 5.42 Compliance with the emerging CGY Framework was carefully established in the wider context of the setting of heritage assets; the imperative to seize the opportunity to optimise site development potential; and to create a genuinely neighbourly, safe and well managed, mixed use neighbourhood whilst resisting the unwelcome overspill of Camden Market activities and anti-social behaviour.
- 5.43 Dialogue continued through the sharing of scheme design, CGYWG questions and project team responses.

Community consultation

- 5.44 The Statement of Community Involvement (SCI) provides additional details with respect to the consultation undertaken with local stakeholders including residents, businesses, community groups and local councillors in the year prior to submission of the application.
- 5.45 The conclusion of the SCI notes that the feedback received demonstrates that the principle of development and the aspirations for creating new community are widely supported in the local community. There are however a range of views about the detail of the application and aspects of the design such as massing and heights. Given the scale of redevelopment, the range of opinions consulted upon and the substantive revisions incorporated into the emerging proposals it is clear that the community has had the opportunity to contribute, to influence and to shape the proposals.

Summary

- 5.46 Overall, and as is evident from the outline above, extensive and meaningful pre-application engagement has been undertaken in respect of the proposals in advance of submission of the application.
- 5.47 A list of engagement-led changes to the scheme is set out in Section 6 of this Statement below. These responses to the engagement process are also set out within the DAS and SCI in further detail.

6. Design and Heritage

Design development

- 6.1 The proposed masterplan and the design of individual buildings and the public realm has undergone a series of iterations, the cumulative effect of which has been a substantial degree of change over the design process. This iterative design process, informed by pre-application engagement with LBC, the local community and key stakeholders including the Greater London Authority (GLA) and Historic England (HE), has resulted in a high quality scheme, which responds to the site context and optimises the delivery of much needed new homes, commercial space, community facilities and public realm.
- 6.2 The overarching proposed masterplan approach, which was established following detailed contextual studies has proved to be robust and has subsequently evolved in response to detailed scrutiny and through an iterative design process including:
- option appraisal schemes
 - evolving scheme presented to the three Design Review Panel sessions
 - emerging schemes presented at public consultation
 - office workshops exploring and developing the proposed masterplan strategy, development principles and design details.
- 6.3 The DAS sets out in detail how the design of the proposed masterplan and the individual buildings and public realm has developed. In summary, the following key changes have been made, in comparison to early versions of the scheme presented to LBC for pre-application discussions and to the early Design Review Panel sessions:
- Increased site permeability, including two parallel primary routes through the site, as opposed to a single more indirect route originally proposed. The additional route runs through the linear park (Railway Park), which was introduced to the scheme through early design development.
 - Introduction of the 'Camden Yard', which has several benefits including:
 - additional public realm space;
 - additional permeability;
 - the mediation of level changes;
 - the provision of workspace and active frontages, and
 - an allowance for a future connection to the stables market.
 - Revisions to building placement and orientation, including:

- Realignment of the taller element of Block A, to respond to relationships to buildings and public space within the site.
- Re-alignment of Block C to increase the width of the linear park (Railway Park) connection, respond to Interchange Yard and promote views of the Roundhouse and Interchange building.
- Alterations to the footprint of Block E1, as referred to below. The massing and distance away from Gilbeys Yard Properties was revised following dialogue with residents.
- Siting of taller buildings considered in relation to townscape views
- Changes to building heights, as follows:
 - Maximum building height reduced from 17 storeys to 14
 - Reduction in predominant shoulder heights, including in relation to Blocks B and C.
 - Removal of taller element from Block B, based on LBC feedback that this impacted on the stables as seen from Chalk Farm Road
 - Reduction in height of Block C by one storey, to ground plus nine, to respond to the relationship with Camden Yard.
 - Increase in height of Block D from 4 to 5 storeys to optimise the site and to ensure future redevelopment of Gilbeys Yard is not limited. Increase in height to Block E2 for the same reasons.
 - Block E1 height reduced from 14 to 10 storeys to reduce perceived height from Gilbey's Yard. Changes were also made to the position, footprint and fenestration, which are referred to in the amenity section of this report.
 - Reducing of height from block F, to improve the relationship to Southampton Square.
 - Emergence of a double-block form for Block A and then a height reduction of Block A from 12 & 17 storeys to 11 & 14 storeys, largely in relation to considerations regarding the Roundhouse silhouette.
 - Height reductions due to view impacts, including with regards to the Roundhouse silhouette – studies of Block A in relation to the Roundhouse were undertaken. Emergence of a double-block option and reduction in height to 14 and 12 storeys.
- The massing and distribution of buildings reflect close dialogue with The LBC's design panel and discussions with the relevant Conservation Area Advisory Committees.

- The siting and massing on the petrol station site followed discussions with the Roundhouse;
- Introduction of rooftop urban farm onto Block B
- Introduction of other community facilities including public conveniences, one of which is specifically designed for evening use
- Reduction in unit numbers from circa 700 to 573 and an increase in the proportion of affordable housing provision.
- Increase to overall provision of public realm and changes to the distribution of public realm
- The form and configuration of the new single access junction between Stephenson Street and Chalk Farm Road.

Proposed masterplan approach and sustainable design

6.4 The overall approach to redeveloping the site has been masterplanned by Allies and Morrison Architects. The DAS sets out the approach in detail and how this has evolved over time and in response to pre-application engagement.

6.5 With regards to planning policy, the proposed masterplan responds to a number of important priorities and considerations, which include:

- delivering sustainable design in its widest sense;
- making efficient and optimal use of the site whilst addressing the site condition and surrounding context; (Local Plan policy G1, London Plan policy 3.5)
- maximising the delivery of new homes, which is a priority land use within LBC; (Local Plan policy H1)
- delivering residential-led higher density mixed use development (GLA Housing SPG), providing a mix of uses appropriate within the town centre and to meet Camden's needs; (Local Plan policy TC2)
- delivering high quality design and high quality residential and commercial accommodation; (Local Plan policy D1)
- creating a high quality place which is inclusive, sustainable and responds to heritage assets; (Local Plan policies D1 and D2)
- addressing the existing context and considering the impact of growth and development, including protecting the amenity of neighbours; (Local Plan policies G1 and A1)
- providing publically accessible open space, play space (LP policy A2) and enhancing pedestrian and cyclist permeability through the site and connecting to the wider area (Local Plan policies T1-T3);

- designing and siting taller buildings in a manner that accounts for the site context, including local and protected views; (Local Plan policies D1 and D2)
- ensuring a safe environment, designing to minimise opportunities for crime (Local Plan policy D1);
- addressing servicing, parking and vehicle movements and ensuring sustainable transport solutions (Local Plan policy T4), and
- delivering against the vision set out within the draft Planning Framework, including a comprehensive approach to the site that gives due consideration to the potential for redevelopment of surrounding areas.

6.6 This Planning Statement, the DAS and the accompanying suite of planning application submission documents demonstrate the proposals do achieve the above aims and that the development scheme is sustainable development of the highest quality that should be supported by LBC.

Response to the planning framework

- 6.7 The draft Camden Goods Yard draft Planning Framework (2017) sets out LBC's vision and key objectives for the land within and around Camden Goods Yard owned by Morrisons (the subject site of this application), Network Rail, One Housing and Market Tech. The Framework is intended to ensure a coordinated approach to these sites. It is anticipated that the Framework will be adopted as an SPD later this year and on adoption this will be a significant material planning consideration.
- 6.8 With regards to this present application, the form of development has taken account of the current condition and future redevelopment prospects of the One Housing properties at Gilbeys Yard and Juniper Crescent and with regards to The Interchange Building and Camden Markets. During pre-application discussions an indicative masterplan was produced for neighbouring sites.
- 6.9 LBC's vision for the Framework area is for a mixed-use new neighbourhood which is developed through an exemplary approach to urban design and architecture and which responds to the heritage and character of this part of Camden.
- 6.10 The provision of new homes is supported on the site and indeed a significant increase is sought.
- 6.11 The Framework is clear that LBC wishes to promote permeability for pedestrians and cyclists through the site, including to allow for a continued and improved connection between Oval Road, Juniper Crescent, Chalk Farm Road and Ferdinand Street and an aspiration for new access points from Camden Markets via the Lock Market. New cycle hire facilities are encouraged. Access to public transport should also be maintained and improved.
- 6.12 The Framework supports a mix of commercial uses including a local retail and commercial offer for the provision of goods and services aimed at local residents and workers and the re-provision of supermarket retail. Cafés, restaurants and other uses

that bring daytime and evening activity are also supported, albeit that late night activity may be more sensitive in terms of compatibility with residents.

- 6.13 Within the Framework area as a whole, the provision of units suitable for small and independent commercial occupiers are sought, including affordable workspace, light industrial workshops and space for small and growing businesses. It is envisaged that commercial floorspace will be more focused on the eastern side of the site; however, in all areas an active ground floor use should be presented onto streets and spaces and inactive frontages should be avoided. The Framework is clear that a mix of commercial units and active frontages can create a sense of safety and security. The masterplan should establish a hierarchy of public and private spaces, though with permeable routes benefitting from natural surveillance to protect residential amenity.
- 6.14 The Framework envisages a series of welcoming places and spaces connected by a legible street pattern. The masterplan should integrate the site with neighbouring areas and reduce the 'island' nature of the site in its current condition. The development should provide a range of neighbourhood spaces with clear but flexible functionality.
- 6.15 The masterplan should promote health and well-being, including through the provision of public open space, with spaces suitable for a variety of activities and to meet the needs of all people. The Framework sets out that open spaces should avoid being overly formal.
- 6.16 The surrounding listed buildings and conservation areas may be sensitive to taller buildings; however, LBC wishes to maximise the delivery of new homes and jobs within this Town Centre location and the Framework is supportive of taller buildings subject to consideration of their effect on the surrounding area and subject to ensuring a good quality environment within the site. With this in mind, important views which may be affected by taller buildings are set out within the Framework.
- 6.17 The Framework document consolidates the key parameters of LBC's vision for the site within the strategy diagram on page 35 (reproduced as Figure 6.1 of this report). The subject site is largely designated for 'new town centre mixed-use' development alongside public realm improvements and new connections through the site. The Framework breaks the wider masterplan into seven subdivisions, which include:
1. Chalk Farm Road. The Framework seeks an inviting gateway to the Framework area including active uses and an improved public realm and environment for pedestrians and cyclists, whilst also creating a welcoming visual connection to the site.
 2. Morrisons. The Frameworks supports redevelopment to provide a significant number of new homes and a mix of commercial space set within a range of open spaces and with on-site community facilities. The masterplan and architecture should integrate with the surrounding area and be permeable for pedestrians and cyclists. Opportunities for key views of the Roundhouse and Interchange building should be maximised from within the site and in local and long views.

3. Interchange Yard and the Market edge: The Framework envisages new connections via the Lock Market and Stables Market
 6. Railway edge. The Framework envisages natural surveillance and biodiversity improvements / a growing corridor.
- 6.18 No part of the site is in an area of the Framework land which is designated purely for residential uses.

Assessment of the proposals in relation to the Framework

- 6.19 The proposed masterplan has been carefully considered to ensure that LBC's aspirations for the area, as articulated within the Framework, will be implemented by the development proposals.
- 6.20 The development proposals will implement the Framework in the following ways, in summary:

- Mixed-use development of the 'new town centre mixed use' designation.
- Provision of a significant number of new homes, including significant on-site provision of affordable housing.
- Exemplary masterplanning and architectural design which takes cues from and is responsive to the local setting of the site and the history of the site and surroundings (refer to section on masterplan design within this Statement and to the submitted DAS).
- Pedestrian and cycle permeability with the surrounding area is maintained and improved. The proposed masterplan offers a number of connecting routes through the site and on to existing streets, including Oval Road and Ferdinand Street via Chalk Farm Road. The junction of Chalk Farm Road with the site access and with Ferdinand Street will be remodelled and the design of this junction has been subject to extensive discussions between the applicant, LBC and TfL. In accordance with the draft Framework (page 41) this will help to support density at the Application Site.
- The proposals create a legible network of routes through the site. It is likely that particular routes will emerge as more heavily used than others for pedestrian movement through the site. The proposed masterplan does not prescribe a 'primary route' through the site because the proposals create a high quality urban environment with a sense of place and it would not be beneficial to design-in an artificially prioritised through-route. In terms of the connection between Chalk Farm Road and Oval Road, there are two alternative routes through the site which offer the most direct passage.
- The development will be car free (except for 20 residential spaces for those with mobility restrictions). Servicing for the commercial and residential floorspace will be routed around the perimeter of the site in order to enable the central area to prioritise the pedestrian environment and public realm.

- The proposals include a mix of commercial premises including those which are envisaged to provide suitable premises for a local retail and commercial offer. Cafés, restaurants and other uses will bring daytime and evening activity. Please refer to the planning assessment section of this report, which refers to the retail offer in more detail, including with regards to premises suitable for small and independent businesses.
- The proposals include space suitable for SMEs and 'maker spaces' for light industrial workshop activity. Affordable workspace will also be provided.
- Commercial floorspace will be more focused on the eastern side of the site; however, the mix of uses is well integrated across the development to ensure a good distribution of active frontages to generate positive activity and to engender a sense of safety and security.
- The majority of the main site parcel, excluding areas designated for public realm improvement, is located within the 'new town centre mixed-use' designation. The Framework does not indicate that LBC has an aspiration to segregate residential and commercial uses within this part of the site.
- The proposed masterplan includes substantial areas of public realm and there are a variety of spaces with differing characters and functions, including more publicly-orientated spaces and those which are quieter and more residential-focused, and in addition private communal space for residents. These different public spaces, or 'yards', are inter-connected as part of the site-wide permeability.
- The relationship of the proposed masterplan, in terms of heights and massing, has been carefully considered in terms of townscape and heritage, including views around the local area and longer views. The proposals seek to optimise the development potential of this significant town centre site whilst having regard to these considerations.
- The removal of the modern retaining wall at the site entrance will significantly open up views into the site and enhance its connection with Chalk Farm Road. The PFS proposals will create a gateway feature which will mark the significance of the site entrance and complement the junction improvements.
- Due to the increase permeability of the site and the beneficial mix of active uses and public spaces the site will no longer have the character of an 'island site' which is disconnected and isolated from the surrounding neighbourhood.



Figure 6.1: Planning Framework Strategy Diagram

Future-proofing the redevelopment of neighbouring sites

6.21 Wider masterplan testing was undertaken by the design team, to explore the relationship of the development proposals to neighbouring sites and the potential for these to come forward for redevelopment. This is set out in the DAS in further detail. Key considerations comprised:

- Redevelopment of Juniper Crescent and Gilbeys Yard.
- Re-opening the railway station at Primrose Hill.
- Permeability from Juniper Crescent to Chalk Farm Road.
- Allowing for future removal of the roundabout.
- Connections to Camden Lock Place.
- Improving the setting of the Interchange building.
- Potential for access to the Winding Vaults.
- Ensuring level changes to neighbouring sites can be accommodated in any future plans.
- Future proofing for a wider connection to Gilbeys Yard , through the potential to remove the single storey 'sacrificial' unit at Block D, albeit that the proposed connection has sufficient capacity for a significant volume of pedestrians.
- Future proofing the 'high line' connection pedestrian bridge through Juniper Crescent on redevelopment.

Architectural design

Development Plan policy

- 6.22 Policy D1 requires the highest standard of design that respects local context and character, to ensure that buildings are attractive, safe and easy to use. D2 refers to the preservation and enhancement of heritage assets and the importance of high quality landscaping and public realm.
- 6.23 LBC's expectation is that all developments should be of the highest standard. A number of specific design considerations are referred to within the Local Plan, in particular the following are considered particularly relevant to architectural design:
- (a) local character and context
 - (b) heritage assets
 - (e) materiality
 - (f) integration with surrounding streets and spaces, permeability
 - (j) responds to natural features
 - (m) preserves significant and protected views
- 6.24 With regards to tall buildings, policy D1 notes that all of Camden is sensitive to tall buildings and assessment criteria for tall buildings are set out in the policy; these essentially include streetscape, townscape, heritage and amenity considerations.
- 6.25 Developments should also take into account CPG1 (Design), albeit that this broadly reflects the provisions of Development Plan policies.

Assessment

- 6.26 In 2010 Camden Council produced a 'Camden Town Place Plan' (updated in 2013). That Plan expressed a series of objectives for the Camden Town area, which includes Camden Goods Yard, of which Objective 5 affirmed the importance of: "Promoting development whilst retaining and enhancing the special character and heritage of the area'.
- 6.27 In its Visions and Principles document of September 2016 (Appendix 6) the project team embraced this objective and wove it into a series of 'development principles' devised to guide our approach and scheme development. Of these two specifically relate to the design of the proposed masterplan and of the buildings and spaces within it:
- 1. Placemaking: We will engage with, investigate and take advantage of the range of constraints and opportunities across these sites to realise the best possible place.
 - 2. Heritage: The proposed development will respond positively to local heritage, including its industrial heritage.

- 6.28 These principles were elaborated by a series of commitments (forged from the wider policy context of both the London Plan and of LBC's Local Plan) which are set out in Table 6.1 and which can be seen to have directly and profoundly informed our design thinking and against which it is possible to assess the success of the submitted design.
- 6.29 As a starting point the proposed masterplan intelligently adapts the unique railway topography of the site to accommodate the new store at Chalk Farm Road level (where it will have a strong and direct connection with the high street) whilst using the higher level Goods Yard 'platform' as the principal location for the streets and spaces defined by the visually and functionally interesting residential and office building frontages.
- 6.30 The transition between levels has been successfully handled so that the sequence of steps, paths and lifts are coherently integrated into the proposed morphology of blocks and streets. This unique morphology has emerged from a clear understanding of historic, current and future patterns of development and activity found in the surrounding context.
- 6.31 In accordance with policy D1, and as will be seen from the DAS, the approach to design has been inspired by the carefully analysed character of site and context; by the creation of opportunity from the constraints imposed by infrastructure and by the integration, from the outset, of the underlying idea that high quality public realm framed by buildings of the highest architectural quality can support the creation of a new place that is attractive, viable, safe and easy to use.
- 6.32 This process powerfully supports the proposed arrangement of buildings and groups of buildings ranging from 3 to 14 storeys in height with the form, scale and mass of each building emerging from an iterative dialogue with the prevailing pattern, density and scale of surrounding development. The density of the development itself is driven by this design-led process and as a consequence sits entirely comfortably within the ranges used to assess acceptability in this respect.
- 6.33 The detailed design and materiality of the buildings, and of the spaces that they define, are inspired, in particular, by the local architectural heritage and robust industrial and commercial legacy. In accordance with policy D1 rhythms, proportions and elevational compositions, along with details and materials (brick, stone, metal) are all properly informed by this context. The DAS explains the detailed design evolution and specific architectural and scale characteristics of the individual buildings. It is notable that the decision to use several different, closely collaborating, architectural practices has created a sense of place where there is both uniformity and diversity in aesthetic and form and thus a place of genuine distinction.
- 6.34 In these regards the proposed masterplan layout, and the detailed design of its buildings and spaces, coherently address patterns of land use and activity; of movement and enhanced connectivity; of the setting of heritage assets; of the creation of new views and juxtapositions along with a contextual arrangement and form of buildings, streets and spaces all of which is distinctively and recognisably of Camden.

Table 6.1: Design commitments

Topic	Principle	Key commitments	Successful influence
Place-making	We will engage with, investigate and take advantage of the range of constraints and opportunities across these sites to realise the best possible place.	The proposed development will deliver a distinctive new mixed-use neighbourhood in Camden Town Centre. The emerging scheme draws upon our ongoing analysis of the sites and the surrounding neighbourhoods, including their grain, scale, typology, urban character and their local daytime and residential populations.	✓
		The new neighbourhood will not feel like a foodstore and PFS with other uses bolted-on. The layering of uses across the sites will mean that it will be possible to spend time in the new neighbourhood with little or no awareness of the foodstore's presence.	✓
		Where the foodstore will be most evident will be at Chalk Farm Road level, where the foodstore will enliven and activate what is currently a dead frontage. This will be achieved in part by removing the retaining wall and delivering an active frontage at street level.	✓
		Place-making is the underlying driver that underpins the entire proposal, both as standalone sites, and as part of a wider masterplan proposition. Buildings will accordingly be laid out to create an appealing and successful arrangement of streets, spaces and uses.	✓
		Convoluting pedestrian access arrangements currently blight the site. The emerging scheme will take advantage of the opportunity to form new, appealing connections into and across the sites, including to the new public spaces.	✓
		The streets and spaces will have different characteristics, from busier and more vibrant streets and spaces lined with commercial uses to quieter and more intimate residential streets and discreet spaces that will not be expected to achieve the same footfall.	✓
		The arrangement of uses will deliver active frontages at ground-floor level. New public and shared spaces will be welcoming. The massing of	✓

		buildings will emerge from this plan form.	
		The proposals will knit into and positively engage with neighbouring streets, spaces and uses by acquiring the DNA of the adjacent neighbourhoods (including Camden, Chalk Farm and Primrose Hill). It will create new opportunities for community cohesion. Importantly, care will be taken so as not to bleed the tourist economy into the new residential and work neighbourhood.	✓
		A fundamental objective of our proposals is to make the most of the potential of these sites. This can be achieved through an intelligent approach to the form of streets, spaces and building blocks. The proposed form and scale is being devised in response to the identified opportunities and constraints.	✓
		The buildings themselves will be designed to be of the highest architectural quality. The proposed masterplan approach is being led-by Allies and Morrison. This approach will include setting a 'rule-book' which will define common characteristics that will be exhibited by the buildings across the sites. Specific buildings across the scheme will be designed by other architect practices local to Camden (Piercy & Co. & Niall McLaughlin). The scheme will exemplify and evolve upon the 'modern Camden vernacular'.	✓
		Making best use of the sites will mean delivering new homes and floorspace across a combination of taller as well as more modest buildings. The taller buildings will be visible from some vantage points away from the sites. However where that is the case they will be designed so that they are buildings one wants to see.	✓
Heritage	The proposed development will respond positively to local heritage, including its industrial heritage.	The layout of streets, spaces and the scheme massing is being informed by assessments of local built heritage interest, archaeology and townscape views.	✓
		The arrangement of uses will draw upon the levels, topography and structures associated with the area's industrial heritage. The emerging proposals work with and take inspiration from this	✓

	historic layering.	
	The proposals will maintain the legibility of the sites' railway legacy, including the integrity of below ground remains.	✓
	Servicing and ancillary activities will continue to take place below ground. The foodstore will be largely hidden from view but its frontage will make a positive contribution to the urban experience. The new homes and workspaces will respond to the character of the historic 'railway level'.	✓

6.35 The (now replaced) Camden Core Strategy set out its own Vision which 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).

6.36 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 in 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).

6.37 This vision was a reference point during design development of the proposals. With this design we can be confident that our shared vision has been met. The Vision and objectives now set out within the Local Plan set out similar ambitions for the borough. The headline statement within the adopted vision is '*We want to make Camden a better borough – a place where everyone has a chance to success and where nobody gets left*

behind. A place that works for everyone' The proposals, through delivering a mixed use development with significant housing choice and a variety of commercial opportunities, will help to implement this vision.

Shopfronts and signage strategy

Development Plan policy

- 6.38 Local Plan policy D3 is clear that shopfronts should be designed to a high standard and should relate well to the upper floors of the buildings within which they sit and to surrounding properties. Shopfronts should be designed so as to contribute to community safety through natural surveillance. Shopfronts should also be assessed with regards to their accessibility.

Material considerations

- 6.39 Camden's Design Planning Guidance (CPG1) provides further information regarding shopfronts, advertisements, signs and hoardings noting that the design of these elements should respect the detailed design, materials, colour and architectural features of the shopfront and building itself. For larger developments this should be considered as an integral part of the overall design.

Assessment

- 6.40 Shopfronts and other active ground floor uses have been designed in an integrated manner so as to reflect the overall high design quality of the scheme.
- 6.41 The site is subject to a signage strategy, which has been prepared by the applicant to ensure that the approach to signage across the site enhances the quality of the place and the user experience.

Heritage

Built heritage

Development Plan policy

- 6.42 London Plan Policy 7.8 establishes that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate and that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 6.43 Policy D2 outlines the objective of preserving and enhancing LBC's heritage assets and their settings, including with regards to the effect on views.
- 6.44 The Local Plan refers to the protection of locally important views, including views from public parks, views relating to Regent's Canal, views into and from conservation areas and of listed and landmark buildings.
- 6.45 The Application Site is located within the Viewing Corridor for the Protected Vista from Assessment Point A.2, Parliament Hill: the summit – looking toward the Palace of Westminster, designated in the LVMF SPG.

- 6.46 The NPPG defines the high test around substantial harm and sets out what may be considered as public benefits in heritage terms, which is anything that delivers economic, social and environmental progress as described in the Framework. Public benefits should flow from the proposed development, and they may include heritage benefits.

Material considerations

- 6.47 The National Planning Policy Framework sets out policy guidance with regards to heritage assets and is clear that heritage assets should be conserved in a manner appropriate to their significance.
- 6.48 Paragraph 126 of the Framework requires Local Planning Authorities to set out a positive strategy for the conservation and enjoyment of the historic environment within their Local Plan
- 6.49 Paragraph 131 provides a positive emphasis with regard to determining planning applications affecting heritage assets, stating that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, and putting them into viable uses consistent with their conservation, as well as the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.50 Paragraph 132 further outlines that local planning authorities should give great weight to the asset's conservation
- 6.51 Paragraph 134 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.
- 6.52 Paragraph 135 requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.
- 6.53 Paragraph 137 states that local planning authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.
- 6.54 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the local planning authority, in determining applications for development affecting listed buildings or conservation areas, to pay special regard or attention, respectively, to the desirability of preserving the listed building or its setting, or preserving or enhancing the character or appearance of the area. Importantly, however, the concept of the setting of a conservation area is not enshrined in the legislation and does not attract the weight of statutory protection.

Assessment

- 6.55 The application is accompanied by a Heritage Statement prepared by Turley Heritage.

- 6.56 The Heritage Statement sets out all the listed buildings, conservation areas and other relevant non-designated heritage assets affecting the site and surrounding area.
- 6.57 Historic England's pre application feedback sets out that the organisation supports the redevelopment of the site, which is considered to detract from this part of Camden Town. However, taller buildings are considered to give rise to a level of impact to the site and surrounding areas, including parts of Primrose Hill Conservation Area, the grade I registered Regent's Park and the setting of the grade II* listed Roundhouse.
- 6.58 HE concludes that the harm is modest and can be outweighed by public benefits as per the NPPF tests.
- 6.59 The proposed development responds to the heritage constraints of the Application Site and to the opportunity to revitalise this part of Camden. The heritage impacts, positive and negative are related to the overall regeneration of the scheme and the wide range of public benefits thereby delivered.
- 6.60 As set out in the Heritage Statement:

In overall terms, the proposed development sustains, and, to a degree, enhances the particular significance of a wide range of the heritage assets identified within the study area, including the contributions made by setting to that significance. In that regard, the proposed development is largely consistent with the relevant statutory duties of the 1990 Act and paragraphs 131 and 132 of the Framework.

- 6.61 Some aspects of the proposed development will, however, give rise to a degree of harm to the significance of a small number of heritage assets located within the study area, and these are identified within the Heritage Statement.
- 6.62 The Heritage Statement concludes that the impacts of the proposal can be considered to lead to a modest degree of less than substantial harm for the purposes of the NPPF. This less than substantial harm is to be weighed in the balance against the significant planning benefits as required by paragraph 134 of the NPPF.
- 6.63 The applicants have given great weight and importance in seeking to avoid this harm in the first instance, and then minimising and mitigating such harm where it is unavoidable, in order to deliver the substantial public benefits that the scheme offers, in particular the redevelopment of this important but underutilised Town Centre site and the creation of a high-quality new neighbourhood.

Townscape and Visual Impact Assessment

- 6.64 The scheme has been assessed during design development and in its final form by Tavernor, which has produced ES Volume 3: Townscape, Visual and Built Heritage Assessment.
- 6.65 Clear views of the site will be appreciated close to the main entrances to the site area and along local streets orientated towards the site. The scheme is also visible in more distant views from the higher positions of Haverstock Hill, local rail/road bridges, bridges over the Regent's Canal and from the summit of Primrose Hill.

- 6.66 The design of the development, including the massing, architectural design and materiality have been conceived so that the scheme appears positively within these views. However, it is acknowledged that within some views, for example view 4, the development will give rise to the loss or reduction of views towards landmark buildings.
- 6.67 In addition, taller buildings within the scheme will have some limited visibility from parks including Castlehaven Open Space, Talacre Gardens and glimpsed views from Regents Park. There will also be glimpsed views within the wider area.
- 6.68 Overall, the townscape impacts from the development have been considered fully during design development and the implications of the proposed development in this respect have been minimised whilst also promoting the beneficial development of the site. The implications of the scheme in terms of heritage assets is set out in detail within the Heritage Statement.

Archaeology

Development Plan policy

- 6.69 Policy D2 reiterates the objectives of London Plan Policy 7.8, which are to preserve and enhance Camden's rich and diverse heritage assets and their settings, including remains of archaeological importance. Where remains are present, the Council will seek to ensure that acceptable measures are taken to preserve the remains and their setting, including physical preservation, where appropriate.
- 6.70 London Plan Policy 7.8 establishes that development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology

Assessment

- 6.71 The Application Site is partially within the Canalside Industry Archaeological Priority Area, which sits within the eastern corner of the Application Site. The APA has been designated due to the 19th and 20th century industrial heritage of the area. The Application Site lies on the site of the former 19th century London and North Western Railway Camden Goods Station, which included a vaulted basement and separate contemporary Horse Stables and tunnels.
- 6.72 The Desk Based Assessment prepared by CgMs consulting assesses the Application Site for its below-ground archaeological potential.
- 6.73 The report notes that the site is identified as having a low potential for all past periods of human activity prior to the nineteenth century.
- 6.74 The historical importance of the study site is related only to any remains of the former Camden Goods Station and horse stables therefore. However, these have undergone significant impacts as a result of demolition and remediation associated with the existing supermarket development and the underground fuel storage tanks for the PFS.
- 6.75 The report concludes that the proposed development could potentially impact on industrial remains and therefore recommends further archaeological mitigation in advance of development, which is anticipated to comprise evaluation and recording works. Such mitigation can be appropriately conditioned. Subject to compliance with any

planning condition the proposal is considered compliant with the Development Plan and material considerations with regards to potential archaeological impacts.

Turley

7. New homes

Providing new homes

Development Plan policy

- 7.1 The London Plan (2016) establishes the pressing need for more homes in London and the need to boost significantly the supply of housing. Policy 3.3 (e) states that Boroughs should identify and seek to enable additional residential development capacity to be brought forward to supplement housing targets and in particular to realise the potential of brownfield housing capacity through intensification, town centre renewal and via mixed use redevelopment in areas with good transport accessibility.
- 7.2 Policy 3.4 states that, taking into account local context and character, design principles and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the London Plan. In this case, as outlined below, the relevant range is 215-405 units and 650-1,100 habitable rooms per hectare.
- 7.3 Local Plan policy H1 is clear that LBC seeks to exceed its housing target of 16,800 additional homes from 2015/16 - 2030/31, including 11,130 additional self-contained homes.
- 7.4 Policy H2 echoes the provisions of H1 with regards to exceeding the housing target on mixed-use sites. Within central areas including Camden Town at least 50% of uplifted floorspace should be self-contained housing.

Material considerations

- 7.5 The Mayor's Housing SPG (2016) refers to site optimisation and considers this issue in greater detail. Optimisation is defined as developing land to the fullest amount consistent with all relevant planning objectives.
- 7.6 The Draft Camden Goods Yard Framework (2017) states that the provision of new homes at the site is supported and a significant increase in homes at the site could be achieved.
- 7.7 The Government Housing White Paper (2017) is clear that housing delivery is supported by national Government.

Assessment

- 7.8 The site is not identified as an allocated development site in the adopted or emerging Development Plan. The site therefore represents a 'windfall' development opportunity; however, the provision of new homes on the site is supported in policy terms.
- 7.9 The redevelopment of the site would deliver up to 573 new homes and would make a significant contribution toward meeting housing targets in the Borough and London, providing much needed housing for local people. There is a pressing need for housing across London and a significant requirement to boost housing supply.

- 7.10 Overall, the proposals meet policy requirements of delivering new homes in Camden. The proposals make beneficial use of underused land that currently detracts from its surroundings in order to make a substantial contribution towards meeting these targets.

Density

Development Plan policy

- 7.11 The London Plan Sustainable Residential Quality density matrix (Table 3.2 of the London Plan) and Policy 3.4 (Optimising housing potential) set out guideline densities and states that '*development should optimise housing output for different types of location within the relevant density range*' subject to consideration of the site context, local character and Public Transport Accessibility Levels.

- 7.12 Paragraph 3.30 of the London Plan, notes that:

Where transport assessments other than PTALs can reasonably demonstrate that a site has either good existing or planned public transport connectivity and capacity, and subject to the wider concerns of this policy, the density of a scheme may be at the higher end of the appropriate density range.

- 7.13 Camden's Local Plan, as above, seeks to make full use of Camden's capacity for housing as a priority land use. It specifically notes that the Council expects the maximum appropriate contribution to housing on sites that are underused or vacant.

Material considerations

- 7.14 The Mayor's Housing SPG sets out more detailed guidance on the application of the Sustainable Residential Quality matrix and with regards to the definition and application of site optimisation.

Assessment

- 7.15 The Net Site Area is calculated to be 2.64 hectares; this is the main site parcel excluding the access road and measured along the line of the proposed access road.

- 7.16 The proposals seek to accommodate up to 573 new homes giving a density of 217 units per hectare. There are 1,535 habitable rooms proposed within the scheme, thus the habitable room density equates to 581 habitable rooms per hectare. The proposed homes will have an average of 2.7 habitable rooms per home.

- 7.17 Ardent's assessment of PTAL is as follows, taken from the Transport ES chapter:

Based on the details on WebCAT, the PTAL rating varies across the Application Site from between 2 and 6, at a 2021 forecast year, noting that the rating at the current supermarket entrance is 6a (excellent), or 5 based on a 2011 baseline year. The PTAL score for the majority of the Application Site is 4 or above, and on average across the Application Site as a whole could be considered to be 5.

- 7.18 The site is within Central London (for the purposes of the density policy) given that the site is part of Camden Town Centre, which is a Major Centre (London Plan Table A2.1). This has been confirmed in pre-application discussions with the GLA (para. 32 of GLA

pre-application advice letter ref. D&P/4158 dated 25 January 2017 – refer to Appendix 4).

- 7.19 On this basis the relevant GLA guideline density range for the site is 215-405 units and 650 – 1,100 habitable rooms per hectare, where (as is the case) 2.7-3.0 habitable rooms per home is proposed.
- 7.20 In accordance with the density details provided in respect of the scheme above, the proposed habitable room density (581 habitable rooms per hectare), proposed unit density per hectare (217 units per hectare) and proposed habitable rooms per home (2.7) sit comfortably within the density range applicable to the site in accordance with Table 3.2 within the London Plan.
- 7.21 Section 5 of this report ‘Description of Development’ sets out additional density calculations, including a scenario in which the Net Site Area is reduced in proportion to all non-residential floorspace, including the foodstore car park area. This produces a nominal site area of 1.78 hectares and a resultant density of 323 units and 864 habitable rooms per hectare. This is still within the guidelines of the London Plan density matrix.

Housing quality

Development Plan policy

- 7.22 London Plan policy 3.5 states that housing should be of the highest quality, internally and externally. The policy directs local authorities to adopt more detailed policy requirements, with regards to measures such as accessibility and space standards.
- 7.23 The London Plan sets out internal space standards, which reflect the DCLG’s Technical Standards (referred to below).
- 7.24 Local Plan policy C1 refers to health and wellbeing, the supporting text sets out some considerations around housing quality, including accessibility, space and layout and noise insulation.
- 7.25 Policy D1 requires housing development to provide a high standard of accommodation.
- 7.26 Policy A1 refers to amenity considerations for occupiers of developments and neighbours. LBC will assess residential developments with regards to a range of factors, including:
- privacy;
 - outlook;
 - sunlight/daylight, and
 - noise and vibration.
 - internal space standards and layouts, and
 - external space.

Material considerations

- 7.27 A number of Camden's Planning Guidance documents provide commentary with respect to achieving housing quality in the borough including Camden Planning Guidance 1 (Design); Camden Planning Guidance 2 (Housing); Camden Planning Guidance 6 (Amenity).
- 7.28 CPG 6 states that to ensure privacy, there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other. This is measured in relation to the distance between the two closest points on each building (including balconies).
- 7.29 Where this distance is unachievable, it may be necessary to incorporate design measures to mitigate potential privacy impacts, such as:
- Room usage / position
 - Location, orientation and size of windows
 - Use of screening measures such as physical features, landscaping features and obscure glazing
- 7.30 Standard 26 of the Mayor's Housing SPG (2016) states that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. Standard 27 sets out a minimum depth and width for all balconies and other private external spaces of 1500mm.
- 7.31 Paragraph 2.3.32 of the SPG goes on to state that in exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement. This area must be added to the minimum GIA.
- 7.32 Standard 29 of the SPG states that the number of single aspect dwellings should be minimised. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.
- 7.33 DCLG's Technical housing standards – nationally described space standard (2015) document sets out the minimum internal space standards for new dwellings across all tenures in Gross Internal Area (GIA). These prescribed space standards are equivalent to those outlined in the London Plan (2016) in Table 3.3: Minimum space standards for new development.

Assessment

Space standards (including private amenity space)

- 7.34 All of the new homes proposed meet or exceed the Nationally Described Space Standard requirements and London Plan standards for new housing with respect to floorspace provision.

- 7.35 The majority of proposed homes have access to private amenity space in the form of a balcony, garden or roof top terrace, as follows:
- 7.36 All of the new homes proposed meet or exceed the Nationally Described Space Standard requirements for new housing with respect to floorspace provision.
- 7.37 The majority of proposed homes have access to private amenity space in the form of a balcony, garden or roof top terrace, as follows:
- Block A homes have balconies of 7sqm; however, 23 homes accessed via Core A2 do not have access to private amenity space;
 - Block B homes have either balconies or front gardens of 5 – 8sqm;
 - Block C homes have balconies or rear gardens of 5 – 10sqm;
 - Block D private amenity space is generally 5-7 sq m and provided as balconies or winter gardens; however, units 1-9 will have 15 sq m rear gardens;
 - Block E1 is provided with balconies of 7-8 sq m for the majority of homes; however, 10 homes will not have access to private amenity space
 - Block F units will all have private amenity space, including either a balcony or terrace of 5 – 10sqm.
- 7.38 Block A, Core A2 includes 13 x 3bed/5person units that include 7sqm of private amenity balcony space. The required amount to meet policy standards is 8sqm and therefore these units fall short of 1sqm of private amenity space for these dwellings. In accordance with the housing space standards, the internal GIA required for 3bed/5person units is 86sqm. The proposed units comprise circa 100sqm net internal area (NIA) and therefore exceed the required internal space standards for the units which are considered to outweigh the 1sqm shortfall in private amenity space for these units.
- 7.39 Similarly, of the 23 units in Block A, Core A2 which do not have any private amenity space and comprise of 1bed/1person units, exceed the required internal space standard requirement of 38sqm GIA. All of these units are circa 40 – 42sqm NIA and given that they exceed the internal space standard requirements are considered to assist in balancing against the lack of private amenity space for these units.
- 7.40 In Block B, Core B2 3 x 3bed/ 5person units include a balcony of 7sqm where the required amount to meet policy standards is 8sqm of private open space. As noted above, the internal space standard for such units is 86sqm GIA. The proposed NIA for such units is 88sqm which is considered to address the minor shortfall in private amenity space for these units.
- 7.41 Similarly, in Block B, Core B3, 3 x 2bed/4person units include a 6sqm balcony where the standards would require the inclusion of 7sqm of private open space. The minimum internal space standard for 2bed/4person units is 70sqm. The proposed units comprise

circa 76sqm NIA where the additional floorspace exceeding the minimum space standards is considered to outweigh the 1sqm shortfall of private amenity space.

- 7.42 As noted above, in Block E1, 10 x 1bed/1person units do not include any private amenity space. All units have an NIA of 42 sq m against a minimum space standard requirement of 37 sq m. The additional 5 sq m of internal floorspace is considered to assist in balancing the requirement for 5sqm of private amenity space.
- 7.43 Lastly, Block F, Core F1 includes 3 x 3bed/5person units with 7sqm balconies against an 8sqm private amenity space requirement. The proposed NIA of these units is some 111sqm against the minimum space standard requirement of 86sqm GIA. The additional internal floorspace is considered to outweigh the 1sqm shortfall of private amenity space for these three units.
- 7.44 In review of the above information, circa 90% of new homes meet the private amenity space standards set out in the Mayor's Housing SPG i.e. a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. Of those that do not and as outlined above, it is considered that the additional internal floorspace afforded to these units is sufficient to address any imbalance.
- 7.45 All residential blocks have access to shared private amenity space. In addition, although performing a discreet function, there is significant public open provided within the development.
- 7.46 On balance, given that all new homes will meet and often exceed internal space standards and a significant majority will meet private amenity space standards, the proposals are considered acceptable in this respect with regards to policy and material considerations in particular guidance provided within the Mayor's Housing SPG, paragraph 2.3.32.

Outlook and aspect

- 7.47 In compliance with Standard 29 of the London Mayor's Housing SPG all residential units proposed with three or more bedrooms are dual aspect units, excluding one unit within Block F, Core F3.
- 7.48 The majority of all units proposed are dual aspect units. In Block A, over 80% of units are dual aspect units. In Block B, 51% of units are dual aspect, 78% in Block C, 90.5% in Block D, 73% in Blocks E1 and E2 and 57% in Block F.
- 7.49 With regards to the potential for exposure to unacceptable noise pollution, for single aspect units, the Noise Impact Assessment confirms that all new homes proposed will have acceptable internal noise levels as a result of appropriate glazing specification and mechanical ventilation. With regards to noise to external balconies, the existing noise environment of the site and surrounding area is such that some external balconies will not meet prescribed standards; however, this is to be expected within an urban location and should be balanced against both the benefits of having private amenity space and the overall planning benefits of the development.

- 7.50 Overall it is considered that the proposals provide a good quality outlook and aspect for all proposed residential units meeting the requirements of policy and standards set in the Mayors Housing SPG.

Internal daylight and sunlight

- 7.51 GIA has assessed daylight and sunlight amenity within the site and has informed developing proposals during the design stage of the project.
- 7.52 The GIA assessment indicates that 88% of proposed habitable rooms meeting or exceeding the levels of Average Daylight Factor (ADF) recommended by the BRE. Lower levels of daylight are likely to be experienced within homes facing other blocks or into a courtyard and, furthermore, the introduction of balconies within some areas creates a degree of obstruction (which is to be balanced against the benefits of private amenity space). Nevertheless, daylight ingress has been maximised where possible.
- 7.53 The levels of sky visibility are also good with 74% of rooms seeing the recommended levels of No-Sky Line (NSL). In addition, all rooms have been designed in accordance with the Room Depth Criterion (RDC) where applicable.
- 7.54 As indicated by the Contextual Density and Daylight Research report submitted by GIA, proposed daylight performance is in-line with recently consented schemes within LBC.
- 7.55 The proposed development will experience good levels of sunlight during the summer and winter across most south-facing façades. Slightly lower levels of sunlight are likely in proximity to balconies. Some living rooms located on the lowest floors and facing the courtyard of Blocks B and F also see low levels of sunlight, as expected.
- 7.56 The overshadowing assessments of all outdoor areas have also shown levels of sunlight availability in excess of the 50% recommended by BRE.
- 7.57 The GIA report concludes that the new homes and public realm will benefit from good levels of daylight and sunlight. The proposals are therefore considered to provide a good standard of residential accommodation in this respect.

Internal Noise and Vibration

- 7.58 Addressed within section 10 of this statement.

Privacy and separation distances

- 7.59 The proposals are designed to deliver high quality homes which address standards in the Mayor's Housing SPG and best practice. All Blocks A – F have been carefully considered and positioned within the site to allow an acceptable relationship to be established between each building and the uses it contains from the ground to all upper floors.
- 7.60 The proposed masterplan sections and drawings illustrate that the proposed residential units within the buildings are suitably separated from one another so as not to cause adverse impact with respect to privacy. This is also considered to have been achieved with adjacent residential properties, as detailed within section 10 of this report.

- 7.61 In addition, within and between the blocks generally lies public space; this sets up a different relationship than if this was private garden space. The public nature of this space and the proposed landscaping and tree planting serves to act as a natural break between the buildings and serves to reiterate the perception of adequate separation distances between the properties.
- 7.62 The separation distances between the proposed residential properties and the adjacent closest proposed building can be summarised as follows (approximate distances given, balconies are excluded):
- Blocks A and F have a separation distance of approximately 14-16m. Homes within the taller part of Block A generally focus main living space fenestration and private amenity space away from Block A. Block A also features recessed private amenity areas in order to reduce perceived overlooking of Block F and to increase the distance to habitable room windows.
 - The two taller elements within Block A have a distance of 12-17m. External amenity spaces within the two elements are generally oriented away from each other.
 - Blocks B and F have a minimum separation distance of 13m and a maximum separation distance of 17m. At the closest point, Block B does not have external balconies on the south-west elevation. Balcony positions of Blocks B and F are also sited alternately in order to avoid direct privacy impacts.
 - Blocks B and C have a separation distance of 15-20m. The closest point corresponds to the corner of Block B and the façades of each building are not directly facing onto each other.
 - Blocks C and D have a separation distance of 12-15m; however, the north elevation of Block D generally features corridors as opposed to living space.
 - Blocks B and E1 have a separation distance of 17m-19m.
 - Blocks E1 and D have a separation distance of 14-16m. Block E1 is orientated more towards Southampton Square rather than towards Block D, so that views are encouraged into this public space. East-facing fenestration is largely to bedrooms and the external amenity space is recessed at the corners to mitigate any amenity impacts.
 - Blocks E2 and F have a separation distance of approximately 15m. Living rooms within Block E2 are generally rear facing, as are the private external amenity spaces, thereby limiting amenity impacts in relation to Block F. Blocks E2 and F face onto the public realm of Winding Vaults Way. Rear bedrooms within units E2 7-11 have side-facing fenestration to prevent direct overlooking towards Gilbeys Yard and the main private amenity space is provided by ground floor gardens (refer to section on neighbouring amenity within this Statement).
- 7.63 The above information demonstrates that overall sufficient space is afforded between the proposed buildings to ensure that the privacy of future residents will be respected. Whilst 18m is not achieved in all cases the degree of separation is considered

reasonably in the context of a central location and given the need to optimise use of the site.

Conclusions on the quality of new homes

- 7.64 The proposed masterplan and the detailed design of the new properties ensure that future residents will enjoy an excellent standard of amenity within this central London location. The development is compliant with the Development Plan and material considerations with regards to the standard of residential accommodation and residential amenity considerations.

Accessible housing

Development Plan policy

- 7.65 London Plan Policy 3.8 (c) and (d) states that ninety percent of new housing is to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and ten per cent of new housing is to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. It is noted in the supporting text that the requirement for 'wheelchair user dwellings' is applicable to all tenures.

- 7.66 Local Plan policy H6 sets out that:

- All homes to meet the nationally described space standard
- 90% of homes to meet Building Regulation M4(2) (which is broadly equivalent to Lifetime Homes
- 10% of homes to meet Building Regulation M4(3) i.e. to be wheelchair accessible or easily adaptable – although it is noted that:

'...where the full requirements of Building Regulation M4(2) and M4(3) cannot be secured, seek design of 10% of homes in each development to meet M4(3) requirements as far as possible, and for any homes in the development that are not broadly consistent with M4(3), seek design to meet M4(2) requirements as far as possible.'

- 7.67 The Local Plan promotes accessibility and expects that all buildings and places meet the highest practicable standards of access and inclusion and will secure accessible car parking spaces and accessible homes.

Material considerations

Assessment

- 7.68 The Access Statement, provided by David Bonnett Associates, sets out the following key parameters of the scheme with regards to accessibility:

- arrival at the site
- approaches to the buildings
- entrance ways

- horizontal and vertical circulation;
- access to facilities;
- typical residential layouts; and
- the emergency evacuation strategy.

7.69 The proposal incorporates the following accessibility features:

- The proposals are designed inclusively i.e. beyond standard Building Regulation requirements wherever practical
- Accessible routes are provided to all connections with local pedestrian routes and public transport
- A shared surface area with level surface comfortable for use by all user groups
- Provision of 20 accessible parking bays; this complies with policy requirements to provide 5% of residents with accessible parking bays (Appendix 2 to the Development Policies document).
- Provision of 84 accessible cycle parking spaces. At least 5% of cycle parking spaces will be easily accessible as per London Cycle Design Standards and some spaces will be larger to accommodate adapted cycles or bicycles.
- 90% of dwellings (516 dwellings) are designed in accordance with Building Regulation requirement M4(2)
- 10% of dwellings (57 homes) are design in accordance with Building Regulations requirement M4(3) 'wheelchair dwellings'

7.70 The development proposals are inclusive for all and comply with specific policy requirements set out above.

7.71 As noted in planning policy, there is a requirement that all new development achieves accessibility to part M4(2) of Building Regulations which requires level access to the entrance of all upper floor dwellings. There are 12 units within the scheme in Block E, Core E2 where level access cannot be provided, instead Part M4(1) can be achieved in respect of these units. This matter was discussed with LBC at pre application meetings and to our understanding no concern was raised with this small proportion of units meeting Part M4(1).

7.72 Overall, the development proposals are inclusive for all and are considered to comply with specific policy requirements set out above.

Affordable housing

Overall provision of affordable housing

Development Plan policy

- 7.73 Local Plan policy H4 sets out a borough-wide target of 5,565 additional affordable homes 2015-2030.
- 7.74 Policy H4 (e) states that '*an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings*'.
- 7.75 London Plan Policy 3.11 states that an average of 17,000 affordable homes should be provided annually across London. This is 50% of the overall London Plan target.

Material considerations

- 7.76 Notwithstanding the above, LBC is now giving weight to the Mayor's draft Affordable Housing and Viability SPG (2016), which establishes a target of 35% of habitable rooms. LBC will apply this on the basis of residential floorspace. Developments achieving 35% provision will be considered acceptable and such schemes will not be required to undertake an early review of viability, provided agreed implementation progress is made within a specified time period.

Assessment

- 7.77 The proposals will provide 184 affordable homes, which equates to 35% by floor area, 39% by habitable room and 32% by unit number. The proposals are therefore compliant with the emerging approach set out within the GLA AHV SPG. We understand from pre-application engagement that LBC supports this approach for the site.
- 7.78 As part of on-going discussions regarding the Secion106 legal agreement for this scheme, it is proposed that no viability review will be required provided that the scheme is implemented within an agreed timeframe.
- 7.79 The proposals are therefore acceptable in planning terms given that the GLA AHV SPG constitutes a material planning consideration that should be balanced alongside provisions of the Development Plan, specifically policy Local Plan policy H4. 35% is considered to be the maximum reasonable provision for this scheme in accordance with the emerging GLA guidance.

Housing tenure

Development plan policy

- 7.80 Local Plan policy H6 states that LBC will aim to minimise social polarisation and create mixed use, inclusive communities by providing a diverse range of housing products, seeking a variety of housing types and prioritising development that provides for affordable housing.
- 7.81 Affordable housing should be provided on a 60:40 ratio of Affordable Rented / Social Rented to Intermediate rent in accordance with policy H4 and London Plan policy 3.11.

- 7.82 The Local Plan sets out a dwelling size priorities table within the supporting text to policy H7 and provides further details based on the need and/or demand for these dwellings in different tenures.

Material considerations

- 7.83 Camden Planning Guidance 2, in paragraph 2.48, notes that there is a degree of flexibility in the application of the above approach to tenure split. However it does note that affordable housing should include a large proportion of family homes.
- 7.84 The draft GLA Affordable Housing and Viability SPG sets out that at least 30% of units should be intermediate tenure, 30% should be affordable rent and 40% can be determined by the local authority.

Assessment

- 7.85 The proposal will provide a ratio of 62% Affordable Rent (at London Affordable Rent levels) and 38% Intermediate Rent by floorspace, as set out in the submitted floorspace schedule and is therefore broadly policy compliant, particularly considering the degree of flexibility afforded with regards to the tenure split and given that the ratio is tipped in favour of Affordable Rented accommodation, which offers lower rental levels than Intermediate homes.

Housing mix

Development Plan

- 7.86 Local Plan policy H7 seeks a range of self-contained homes of different sizes to meet identified dwelling-size priorities. Although a dwelling priority size guide is set out within the Local Plan (Table 1) it is noted that this does not provide a prescriptive basis for determining the mix of homes on individual sites. Housing mix policy is further elaborated upon in policies H6 and H7.
- 7.87 The adopted preferred dwelling mix is set out below in Table 7.1 below. This dwelling mix addresses the size of homes (number of bedrooms) needed for large and small families with children, single people, couples and other types of households. There is a particular need for three-bedroom Social/Affordable Rented units (this is reiterated in Local Plan paragraph 3.75).
- 7.88 Local Plan paragraph 3.189 also notes that:
- ‘Having regard to criteria (c) to (h) in Policy H7, the Council acknowledges that it will not be appropriate for every development to focus on the higher priorities in the Table 1. However, we consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall...’.*
- 7.89 The GLA Housing SPG (2016) acknowledges that central and well-connected areas may be more suitable for one and two bedroom units.

Table 7.1: Adopted dwelling size priorities table

	1 bedroom or 2 bedroom studio	3 bedroom	4 bedroom or greater	Aim
Social/Affordable Rented	Lower	High	High	Medium
Intermediate	High	Medium	Lower	Lower
Market	Lower	High	High	lower

Camden Local Plan (2017)

Assessment

7.90 The proposed housing mix by tenure is set out in table 4.4 and 4.5(repeated as tables 7.2 and 7.3 below)

Table 7.2: Unit size mix by tenure (floorspace)

	Studio	1 bed	2 bed	3 bed / 4 bed	Notes
Market homes	10%	29%	45%	16%	
Intermediate Rent		46%	54%		
Affordable Rent		14%	26%	60%	

Source: 1095_CamdenGoodsYard_Current Mix_170526

Table 7.3: Unit size mix by tenure (unit)

	Studio	1 bed	2 bed	3 bed / 4 bed
Market homes	16%	36%	38%	11%
Intermediate		56%	44%	
Affordable Rent		23%	28%	49%

Source: 1095_CamdenGoodsYard_Current Mix_170526

7.91 The proposals are policy compliant in the following respects:

- There is a significant level of three and four bedroom Affordable Rent homes and this is the largest category of provision within the AR tenure. There is a significant provision of two bedroom Affordable Rent homes, which is a high priority in the Local Plan.
- The mix of one and two bedroom Intermediate homes responds to both the affordability constraints of larger units and the adopted policy position, which reflects this consideration.
- Two and three bedroom market homes are the predominant category and this is consistent with both the adopted policy position.

Rental levels

Material considerations

- 7.92 Rental levels sought for both the Affordable Rented and Intermediate housing products are set out within a range of documents, including the GLA *Homes for Londoners – Affordable Homes Programme 2016-2021* (2016), the GLA Annual Monitoring Report, the draft GLA Affordable Housing and Viability SPG (2017), Camden Planning Guidance 2 (Housing) (2016) and the LBC (2016) Intermediate Housing Strategy.

Affordable Rent

- 7.93 London Affordable Rent is defined within the GLA *Homes for Londoners*. Rental levels are related to formula rent cap figures for social rents. This differs from nationally defined Affordable Rent, which is provided at rents guided by the local market such that rents are no more than 80% of gross market rent inclusive of service charges. The GLA does not consider this benchmark to be genuinely affordable. Further detail is provided within the Affordable Housing Statement.
- 7.94 LBC strongly encourages affordable rents to be set at a level lower than the relevant Local Housing Allowance (LHA) cap, where this represents less than 80% of local market rents.

Intermediate housing

- 7.95 The GLA draft Affordable Housing and Viability SPG outlines the Mayor's intention to '*maintain...flexibility to meet local needs while ensuring the delivery of his preferred affordable products*'. The SPG sets out that London Living Rent and/or shared ownership is the preferred intermediate product, although it is recognised that authorities 'may prioritise other intermediate products that are genuinely affordable where they better meet the needs of their area'.
- 7.96 LBC has identified, within its Intermediate Housing Strategy, that Intermediate rented products (as opposed to shared ownership) are a more affordable tenure and therefore Intermediate rented is LBC's preferred form of Intermediate housing.
- 7.97 LBC encourages providers to adopt Intermediate rents which range from 40 – 80% of market rent, subject to scheme viability.
- 7.98 As an intermediate housing product, households in London currently must have an income of less than £90,000 to qualify for intermediate rent. However, this threshold is regularly reviewed, and it is understood that the Mayor intends to lower this threshold to £60,000 in the forthcoming 2017 Annual Monitoring Report¹.
- 7.99 Within this policy framework, LBC seeks to establish intermediate rents which are affordable for households with incomes which fall below this threshold, by ensuring that a majority of provision is affordable to households with incomes between £30,000 and £40,000 (as adjusted by wage inflation).

¹ GLA (2016) *Homes for Londoners – Draft Affordable Housing and Viability SPG* (para 2.38)

Assessment

- 7.100 The Affordable Housing Statement prepared by Turley Economics sets out the approach to affordable housing rental levels.
- 7.101 In establishing how the proposed development should interpret the above guidance, the applicant has engaged with LBC. Through this engagement, it has been agreed that a balanced and flexible approach could be taken whereby the provision of some intermediate units above a £30,000-£40,000 household income threshold could enable the provision of units that would be affordable to households within this threshold. Advice from LBC has also indicated that a higher income cap of £80,000 would apply for 2 bed units accommodating 4 persons (2b4p), although this would be at the upper end of its affordability measure.
- 7.102 On the basis of these discussions and the relevant guidance and policy:
- Affordable Rent units will be rented on the basis of London Affordable Rent
 - Intermediate units will be rented on the basis of affordability for specific household income brackets:
 - One bedroom units will be affordable to households earning £40,000 per annum based on the LBC method for calculating rents.
 - 50% of the two bedroom intermediate units will be affordable to households earning £50,000 per annum and 50% will be affordable to those earning £55,000 per annum.
- 7.103 The proposals are considered to provide an appropriate mix of provision with regards to rental levels, in accordance with the above policy, guidance and further to pre-application discussions with LBC.

8. New commercial premises

Retail

Development Plan policy

- 8.1 London Plan Policy 2.15 states that town centres should be the main foci (beyond the Central Activities Zone) for commercial development and intensification. Supporting text to the policy notes that town centres are key locations for a diverse range of activities, including retail, leisure and office space as well as housing, social infrastructure and public open space.
- 8.2 It is noted that with sensitive, integrated planning, addressing the pressing need for additional housing (in accordance with Policy 3.3) will also promote investment in town centres and that high density, housing led, mixed use redevelopment can improve the attractiveness of town centres.
- 8.3 London Plan Policy 4.7 supports a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres. The scale of retail, commercial, culture and leisure development should be related to the size, role and function of a town centre and its catchment and should be focused on sites within town centres.
- 8.4 Local Plan policy TC1 states that significant additional provision of retail floorspace should be directed to Camden Town, Town Centre.
- 8.5 Policy TC2 requires new retail spaces to be of high quality, provide generous storey heights and incorporate room for signage.
- 8.6 Policy TC12 protects secondary frontages as locations for shops (A1) together with a broader range of other town centre uses to create centres with a range of shops, services, and food, drink and entertainment uses which support the viability and vitality of the centre.
- 8.7 Policy G1 notes that Camden will focus growth in the most suitable locations. G1 firstly promotes a concentration of development to the key growth areas in the borough and then directs appropriate development in other highly accessible locations including Camden Town Centre. Camden Town is considered to be a suitable location for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities.

Material considerations

- 8.8 CPG 5 Town Centres, Retail and Employment designates the Main Site Parcel as a 'Secondary Frontage' and the PFS Parcel as a 'Sensitive Frontage' within Camden Town Centre.
- 8.9 The Draft Camden Goods Yard Framework (2017) supports a mix of commercial uses including a local retail and commercial offer for the provision of goods and services aimed at local residents and workers and the re-provision of supermarket retail. It is noted that cafes, restaurants and other uses will bring daytime and evening activity.

- 8.10 The Camden Retail and Town Centre Study (2013) indicates a need for around 30,000 sqm of new retail floorspace in the borough by 2031, in addition to that to be provided at King's Cross and St Pancras.

Assessment

- 8.11 The proposals will replace the existing foodstore with a new and improved modern foodstore and will introduce a significant amount of additional A-class uses into the town centre, assisting to meet the projected need of new retail floorspace in the Borough. The proposals are compliant with and supported by Development Plan policy and relevant material considerations set out above.
- 8.12 In addition, 1,243 sqm GEA of A-class floorspace would be included within the proposed PFS parcel and a further 787 sqm GEA of A-class floorspace is proposed within the main site to be made up of seven smaller units across the site in the ground floor levels of Blocks A, B, C, D and F.
- 8.13 With respect to the temporary PFS, the proposed temporary foodstore would comprise 2,258sqm and include a forecourt shop of some 53sqm.
- 8.14 The proposal goes beyond simply introducing new retail floorspace to the site and creates real change to Camden Town Centre by promoting, including and integrating a range of uses and activities to make the most effective use of the land which enables intensification via this housing and retail led mixed use development.
- 8.15 The retail proposals contribute to the vitality of this particular part of the Town Centre introducing an appropriate scale of retail uses relative to the site and function of the Town Centre, where such uses are directed and supported in policy terms.
- 8.16 The proposal includes an anchor convenience retail store but also includes smaller retail units to assist in meeting objectives of Local Plan policy TC5.
- 8.17 Overall, the proposed retail activity and floorspace proposed is supported at the site in adopted and emerging policy and in particular given the site's location within Camden Town Centre, the highest order centre in the retail hierarchy. The proposals will support the character, function, vitality and viability of Camden Town as a centre and is not considered to cause harm to the local area or the amenity of neighbours.

Independent and SME retail

Development Plan

- 8.18 Local Plan policy TC5 encourages the provision of small shop premises suitable for small and independent businesses. Large retail developments should incorporate a proportion of smaller units. Affordable retail premises are encouraged.
- 8.19 Paragraph 9.52 notes that small units are considered to be less than 100 sq m gross floorspace, though this will be assessed in relation to the character and size of shops in the local area.
- 8.20 Paragraph 9.54 notes that developers are encouraged to seek independent occupiers and where possible provide premises at affordable rents.

- 8.21 Local Plan policies E1 and E2 seek to secure a strong economy by supporting businesses of all sized, in particular start-ups, small and medium-sized enterprises.

Assessment

- 8.22 In terms of the provision of smaller retail units, the following units are proposed (areas in GIA):

- Block A single retail unit of 177 sq m
- Block B single retail unit of 47 sq m
- Block C single retail unit of 153 sq m
- Block D single retail unit of 118 sq m
- Block F – two retail units totalling 177 sq m

- 8.23 All of the above retail units are relatively small and two of the units are well below 100 sq m (including Block F). The requirements of the Development Plan in this respect are therefore met.

- 8.24 These retail units will be well suited to independent businesses and will be more affordable to rent given their size. The provision of affordable workspace (and indeed affordable housing) should be weighed in the balance in LBC's assessment of this matter.

Food and drink

Development Plan

- 8.25 Local Plan policy TC2 states that the Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. The Policy seeks to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located; provide for and maintain, a range of shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice; make sure that food, drink, entertainment and other town centre uses do not have a harmful impact on residents and the local area and focusing such uses in key areas including town centres.

Assessment

- 8.26 Blocks A, B, C, D and F all include flexible A1/A3 units at ground level. The PFS building will accommodate flexible A1-A4 use. In total seven independent units are proposed of various sizes. All of the proposed units front on to the main square and walkways to provide active frontages around the entire development.
- 8.27 Policy supports the introduction of food and drink uses to town centre locations. The location of the site in the town centre and the inclusion of such uses are not considered to cause harm to the character, function, vitality and viability of the town centre and would serve to enhance these aspects of Camden Town Centre and would also be managed so as not to adversely impact on the amenity of neighbours.

- 8.28 It is considered that the inclusion of these flexible retail units is in accordance with planning policy.

Office and workspace

B1 offices

Development Plan policy

- 8.29 London Plan Policy 4.2 (b) states that new office development should be focused on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment.
- 8.30 Local Plan policy G1 states that LBC will promote appropriate development in highly accessible areas including Camden Town Centre. Such areas are considered to be suitable locations for the provision of a range of commercial uses including offices.
- 8.31 Policy G1 also sets out LBC's objectively assessed needs to 2031 for 695,000sqm of office floorspace to 2031.
- 8.32 Policy E1 directs new office development to growth areas, Central London and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 – 2031.
- 8.33 Local Plan paragraph 5.27 notes that smaller scale office development will occur at other sites across Central London, with some provision in Camden Town Centre. It is therefore considered that a range of scales of office should be provided.

Assessment

- 8.34 The proposals include 13,546sqm (GEA) of office floorspace. This would make a significant contribution to meeting the forecast office floorspace requirements in the Borough. In addition it is anticipated that 1,184 full time equivalent jobs would be created as a result of introducing the total mix of commercial floorspace to the site, including 869 jobs in relation to the office element.
- 8.35 Office floorspace is incorporated across the site in Blocks A (at first floor), B (at ground and first floor), on the upper floors of the temporary PFS and within ground to fifth floors of the permanent PFS building. Office floorspace has been designed so that it will be flexible to different types and scales of operation.
- 8.36 Office use is an acceptable and appropriate town centre use, where indeed such uses are directed in policy terms. The site is located in an accessible area and office provision serves to enhance the mix of uses included within this mixed use development adding to the vibrancy and vitality of the site and its contribution to the town centre in this part of Camden Town.
- 8.37 Overall it is considered that the proposals meet the objectives of adopted and emerging policy requirements with respect to office floorspace and the aspirations of the Council in achieving successful mixed use developments in appropriate locations in the Borough

B1(c) workspace

Development Plan policy

- 8.38 Local Plan policy E1 states that LBC will support businesses of all sizes, in particular start-ups and SMEs.
- 8.39 Policy E2 states that LBC will encourage the provision of employment premises including space suitable for start-ups and SMEs, including managed affordable space, where viable.

Material considerations

- 8.40 The Draft Camden Goods Yard Framework (2017) seeks to cultivate commercial activity through the provision of a range of unit types and sizes including light industrial workshops, space for small scale creative industries and a range of office accommodation including move on space so businesses can remain in the area and grow.
- 8.41 Camden's Planning Guidance CPG5 Town Centres, Retail and Employment (2013) states at paragraph 7.8 that Camden has a very restricted supply of sites and premises suitable for light industrial, storage and distribution uses.

Assessment

- 8.42 The proposals include spaces for light industrial workshop activity of 767 sq m GEA across the site and in Blocks A, B and F at ground level. The commercial floorspace is focused toward the eastern side of the site however the mix of uses is well integrated across the development to ensure a good distribution of active frontages and positive activity.
- 8.43 The provision of on-site light industrial units is supported at the site in policy terms, in particular addressing the shortfall of such floorspace in the Borough. The inclusion of such floorspace is expected to generate around 14 full time equivalent jobs. The proposed B1(c) units are considered compliant with Development Plan policy and the emerging Camden Goods Yard Framework (2017).

Affordable office and SME space

Development Plan policy

- 8.44 As above, Local Plan policies E1 and E2 encourage the provision of employment space including a range of types of accommodation such as that suitable for SMEs. No specific requirement is set out in terms of the amount or proportion of affordable workspace.
- 8.45 London Plan policy 4.1 supports the provision of a strong, sustainable and diverse economy, including through the availability of '*suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors*.'

Material considerations

- 8.46 The Draft Camden Goods Yard Planning Framework (2017) seeks the provision of units suitable for small and independent commercial occupiers, including light industrial workshops.

- 8.47 Camden Planning Guidance 8 (Planning obligations) states that the Council may require the inclusion of affordable workspace to help support small businesses and provide a range of employment opportunities.
- 8.48 The Mayor's Town Centres SPG (2014) sets out that commercial space should be realistically priced, actively marketed, appropriately sized, planned, designed and fitted out to ensure that they meet the requirements of businesses looking to occupy space.

Assessment

- 8.49 The proposals include 465 sq m GIA of affordable office space. This office space will be managed by an affordable workspace operator. It is anticipated that the affordable workspace will be operated in partnership with Camden Town Unlimited, Camden Town's Business Partnership.
- 8.50 Whilst there is no absolute Development Plan policy requirement it is considered that this site is an appropriate location for affordable workspace and that where policy indicates this may be provided, a site of this scale is an instance in which there is a planning policy basis for affordable workspace to be secured as part of the planning decision and associated legal agreement.
- 8.51 There is no specific aspiration or policy requirement in terms of the amount or proportion of affordable workspace. The amount proposed is considered a proportionate response with regards to the overall development and also taking due account of the need to provide other planning benefits including affordable housing.
- 8.52 In addition to affordable office space there will be market B1(c) space, which is conceived as 'maker spaces' within which creative activities can be accommodated. Creative sector employment is encouraged by planning policy.
- 8.53 Smaller duplex office units along Roundhouse Way will ensure that there are smaller office opportunities available to the borough. These will be prevented from being combined into larger units and so available in perpetuity.

Community space

Development Plan Policy

- 8.54 London Plan Policy 3.16 encourages the enhancement of social infrastructure. This is further reiterated in LP4.6 which states that major mixed use developments should provide arts and cultural facilities.
- 8.55 Local Plan policy C2 seeks to ensure that developments contribute towards strong and successful communities including the provision of community facilities. The Council will expect developments that result in any additional need for community or leisure facilities to contribute towards supporting existing facilities or providing new facilities.
- 8.56 Policy C3 notes that LBC will seek opportunities for new cultural and leisure facilities in major, mixed use developments.

Material considerations

- 8.57 CPG 8 provides further details concerning the types of community facilities to be provided which includes (but is not limited to) childcare facilities, education and training facilities, and libraries.

Assessment

- 8.58 Whilst the onsite provision of community facilities is not necessarily required under the Development Plan, the Council encourage the provision of such use. As such, the proposals include 86 sq m (GEA) of community space which is located within Block D of the proposed development.
- 8.59 The community space will be flexible to accommodate a number of uses. There is no specific aspiration or policy requirement in terms of the amount and type of community space to provide. Against this background, we consider the proposals to be acceptable and in accordance with the objectives set out in the above policies.

9. Public realm

Open space

Development Plan policy

- 9.1 London Plan Policy 7.18 states that the Mayor supports the creation of new open space to ensure satisfactory levels of local provision.
- 9.2 Local Plan policy A2 seeks to secure new and enhanced open space from developments that create an additional demand for open space. This may include through planning obligations and/or the Community Infrastructure Levy but with priority given to securing public open space on site.
- 9.3 Camden Town is located in an area deficient of open space and that significant development opportunities offer a way to introduce additional open space to the area.
- 9.4 Policy A2 sets out that 9 sq m of open space is required per resident and 0.74 sq m of open space per non-residential occupier.
- 9.5 Policy D1 design requires development to integrate well with surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage.
- 9.6 The Local Plan notes that the upgrading of open spaces and the public realm is often a key driver of regeneration and renewal plans, restoring confidence and pride in an area.

Material considerations

- 9.7 More detailed quantitative requirements for open space are set out within Camden Planning Guidance 6. The Council seeks the following types of open space:
- amenity open space
 - children's playspace
 - natural greenspace
 - outdoor sport facilities
 - allotments/community gardens
- 9.8 Figure 4 within the SPG establishes that 5 sq m of the required 9 sq m per adult should be provided as amenity open space, and the remainder as natural green space. Similarly, 4 sq m of amenity open space should be provided per child, with 2.5 sq m of playspace and 2.5 sq m of natural green space. Outdoor sports facilities and community growing space should be accommodated where possible within these spaces but there is not a separate quantitative requirement for these types of provision. Figure 5 within the SPG outlines open space requirements in relation to bedroom numbers and commercial floorspace.

- 9.9 CPG 6 Amenity contains detailed guidance with regards to open space, noting that open space standards relate specifically to public open space provide opportunities for social interaction and a focus for community activities which private spaces cannot be used for.

Assessment

- 9.10 Table 9.1, below, sets out the open space requirements of the proposed scheme in relation to bedroom numbers and commercial floorspace, as required by CPG 6. The table also sets out the proposed level of open space provision. It is evident that overall the proposals meet and exceed the provision of open space at the site.
- 9.11 It is acknowledged that there is a short fall of natural green space in accordance with the calculations; however, the proposals still deliver approximately 80% of the required natural green space. This is comfortably considered to be outweighed by the over provision in open amenity space (30%), children's play space (280%) and the additional provision of outdoor sports facilities and allotments/community gardens.

Table 9.1: Open space requirements - CPG 6

	Units	Amenity open space	Play space	Natural green space	Outdoor sports	Community growing	Total
<i>Required open space</i>							
1 bed	271	1762		1,409			
2 bed	211	1941	127	1,519			
3 bed	83	1062	241	789			
4 bed	8	113	29	82			
	573	4,878	397	3,799			9,074
Commercial	27502	594		492			1,086
Total requirement							10,160
<i>Proposed open space</i>							
		7,257	1,129	3,434	108	368	12,261

Source: Gillespies Landscape section of DAS

- 9.12 The Commercial Open Space requirement is calculated based on Camden's Amenity Planning Guidance (CPG6) as set out in Figure 5. We note that this differs and exceeds that within the Socio-Economic chapter of the Environmental Statement specifically in paragraph 6.258 and Table 6.36 which is based on the guidance set out in CPG6 Figure 4.
- 9.13 It is also important to highlight that there is no formal requirement to provide outdoor sports facilities and allotments community gardens as part of the proposal in policy terms however the integration of such uses into the scheme adds variety, diversity and qualitative benefits to the open space contribution at the site.

- 9.14 The proposed open spaces assist to improve movement through the site and wider area with direct, accessible and easily recognisable routes which contribute positively to the street frontage. It is evident that the successful and positive integration of open space to the scheme adds significant value in driving the renewal of the site and its context which will serve to instil a longstanding confidence in the quality of the proposed development.
- 9.15 All open space at the site is proposed to be of a high quality and has been designed as an integral part of the scheme making it an organic and fundamental element of the proposal. All types of open spaces are included in the scheme, meeting and exceeding the requirements of the above Development Plan policies and material considerations.

Play space

Development Plan policy

- 9.16 Local Plan policy A2 seeks to secure play space from developments that create an additional demand.
- 9.17 Supporting paragraph 6.49 refers to the provisions of CPG 6 with regards to the open space requirements for new development.

Material considerations

- 9.18 Figure 5 of CPG 6 sets out play space requirements based on unit size (in terms of number of bedrooms). In accordance with CPG 6 the proposal should provide 396 sqm of play space on the basis of the requirements set out within Figure 5 as summarised in Table 9.1 above.
- 9.19 In pre application discussions with LBC, an alternative child yield methodology was provided, which is based on a combination of the Camden Survey of New Housing (2002-08) and the requirements of CPG6. The methodology (set out in Appendix 7) produces two alternative child yield figures:
- 216 (based on Camden Survey of New Housing)
 - 171 (based on CPG 6 Appendix B)
- 9.20 These child yield figures would result in a play space requirement of between 427.5 – 540 sq m.
- 9.21 The GLA's SPG play space calculation spreadsheet (which supports the GLA SPG on Play and Informal Recreation (2012)). is also available to assess the amount of play space required of a development. This establishes a higher amount of play space for the proposals, of some 1,785sqm. However, this is based on a requirement of 10 sq m per child. Whilst the GLA SPG refers to a minimum 10 sq m of dedicated play the SPG notes that this is indicative and allows for boroughs to adopt local standards of provision (as set out in para. 4.24 of the SPG). The requirements of LBC for 2.5 sq m per child are considered to take precedence.
- 9.22 The proposals clearly exceed the requirement for between 396 – 540 sq m of play space.

- 9.23 The GLA SPG notes that the provision of good quality places to play is an integral part of the creation of lifetime neighbourhoods. The SPG notes that good quality playable space is one providing all children and young people with safe access to physically accessible and inclusive facilities that are stimulating and fun.

Assessment

- 9.24 The proposals will provide onsite play space, as set out within Table 1.1 below.

Table 9.2: On site play space

Type of playspace	Amount (sqm)	Notes
Doorstep Play 0-4 years	219 sqm	
Play 5-11 years	650 sqm	
Play 12+ years	260 sqm	
Total public play space	1,129	
Private doorstep play	183 sq m	
Outdoor sports	108sqm	Table Tennis. Included as part of 12+ years play.

Source: Gillespies Landscape section of DAS

- 9.25 The play space provision outlined above significantly exceeds Camden's CPG6 requirements (366 sqm) and provides more than 55% of the calculated requirement in accordance with the GLA play space calculation spreadsheet, the total public play space being 1,003sqm.
- 9.26 The amount of play space provided within the scheme is considered a significant amount of valuable play space. The high level of provision on site in this urban town centre location is considered a significant contribution to the open space proposed and provides valuable social and community infrastructure to the existing and new community for a range of ages to meet the principles of a lifetime neighbourhood.
- 9.27 The design of the play space implements the best practice guidance with the GLA SPG and will deliver a high quality of play provision for the new neighbourhood. Further details are set out within the submitted landscape strategy.

Community safety and Secured by Design

Development Plan policy

- 9.28 London Plan Policy 7.3 states that development should reduce the opportunities for criminal behavior and contribute to a sense of security without being overbearing or intimidating. In particular:
- Routes and spaces should be legible and well maintained, providing convenient movement without compromising security.

- There should be clarity as to whether a space is private, semi- public or public with natural surveillance of publicly accessible spaces from buildings at their lower floors.
- Design should encourage a level of human activity that is appropriate to the location, incorporating a mix of uses where appropriate, to maximize activity throughout the day and night, creating a reduced risk of crime and a sense of safety at all times.
- Places should be designed to promote an appropriate sense of ownership over communal spaces.
- Places, buildings and structures should incorporate appropriately designed security features.
- Schemes should be designed to minimise on-going management and future maintenance costs of the particular safety and security measures proposed.

9.29 Local Plan Policy C5 aims to make Camden a Safer Place. The policy requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime including Camden Town. The policy also requires appropriate security and community safety measures in buildings, spaces and the transport system in addition to promoting safer streets and public areas and promoting the development of pedestrian friendly spaces. There is also a requirement to address the cumulative impact of food, drink and entertainment uses, particularly in Camden Town (and other areas).

Material considerations

9.30 Part of the vision for the site outlined in the draft Camden Goods Yard Framework (2017) is that it should create an environment that feels safe and welcoming by day and night. The draft Framework sets out that good levels of activity result in passive surveillance of streets and spaces. To achieve this it is considered that the proposals at the site should include a varied mix of commercial units and active frontages designed to generate activity that will attract people to walk through the area during the day and evening. Consideration of evening uses should be considered with regards to compatibility with neighbouring residential accommodation.

9.31 The draft Framework also considers that the site layout and distribution of uses should be designed with a clear hierarchy of public and private spaces and with clear permeable routes with good natural surveillance to protect residential amenity. The aim of the development should be to create a safe, pleasant and legible environment.

Assessment

9.32 The proposals are fully compliant with all aspects of London Plan Policy 7.3 Designing out Crime. Great attention and consideration has been given to all aspects of the policy which are embedded within the design of the scheme. The site has been designed as a legible space relative to its immediate and wider context. The Design and Access Statement clearly illustrate how private and public spaces have been successfully integrated around buildings at ground level.

- 9.33 The mix of uses proposed on site is appropriate to its location and encourages activity throughout the day and into the evening; creating a safe environment at all times. Accordingly, the scheme also responds positively to Local Plan policy C5 Safety and Security. The proposals fully embrace the draft Camden Goods Yard Development Framework's commentary regarding safety and security creating a development that is safe, pleasant and legible.
- 9.34 It is also relevant to note that the scheme has been designed with input from a Metropolitan Police Designing out Crime Officer. The Design and Access Statement sets out all detailed aspects of the scheme which result in the creation of a safe place at the site, for the development and its wider area. Some key design safety measures of the scheme are outlined below, however these are fully and more comprehensively set out in the Design and Access Statement.
- The proposed masterplan has been developed to create a strong network of streets, with two primary routes through the site linking Chalk Farm Road and Oval Road.
 - Both the primary routes and neighbourhood routes are overlooked.
 - At night, routes through the linear park (Railway Park) will be closed and gated.
 - The strategic location of play equipment within Interchange Yard and Southampton Square signal what behaviour is expected and bring the spaces under the supervision of local residents.
 - The mix and disposition of uses across the site have been carefully considered to promote activity but avoid conflict. Commercial activity is located towards the north and close to the town centre but will not include bars, clubs and venues.
 - A mix of uses will ensure activity throughout the day.
 - A pop up toilet will be located adjacent to the Stables entrance on Stephenson Street.
 - A resident's concierge will be centrally located in Block E. It gains views down Roundhouse Way , Winding Vault Way and across Southampton Square;
 - CCTV will be employed on the site to complement the wider range of design led measures.
 - Maintenance of the site will be looked after by an estate wide management company.
- 9.35 In accordance with the information set out above and that contained within the Design and Access Statement the proposals are fully compliant with all designing out crime policies.

10. Respecting our neighbours

Outlook and privacy

Development Plan policy

- 10.1 Local Plan policy A1 is clear that the impact of development on neighbours must be fully considered and that the amenity of Camden's residents, workers and visitors will be protected. Considerations set out within policy A1 include:

- visual privacy;
- outlook, and
- sunlight, daylight and overshadowing.

- 10.2 The Local Plan reflects key considerations set out within the London Plan, including policy 7.6 (Architecture).

Material considerations

- 10.3 Camden Planning Guidance 6 – Amenity (2011) sets out more detailed supplementary guidance to the above Development Plan policies.

- 10.4 With regards to overlooking, privacy and outlook, the following key points are set out:

- Mitigation measures can be included where overlooking is unavoidable
- Overlooking of living rooms, bedrooms, kitchens and the part of a garden closest to the house should be particularly minimised (para. 7.4).
- There should normally be a distance of 18m between directly facing habitable room windows; however, design measures such as consideration of location of development, position and orientation of windows, position of rooms and screening methods can all be used.
- Outlook is defined as '*the visual amenity enjoyed by occupants when looking out of their windows or from their garden. How pleasant an outlook is depends on what is being viewed. For example, an outlook onto amenity space is more pleasant than an outlook across a servicing yard.* CPG 6 is clear that '*the specific view from a property is not protected as this is not a material planning consideration*' (para. 7.11).

Assessment

Gilbeys Yard

- 10.5 The relationship between blocks E1 and E2 and existing residential properties at Gilbeys Yard has been carefully considered throughout the consultation and design stages of the scheme.

Block E1

- 10.6 At its closest point, there is a distance of approximately 14 m between the rear elevation of E1 and the rear elevation of the nearest property within Gilbeys Yard, which is at the point where Gilbeys Yard has a rearwards projection from its main rear building line.
- 10.7 Based on known layouts within Gilbeys Yard it is understood that the majority of windows from the Gilbeys Yard properties facing towards block E1 within the narrowest part of the separation distance between the properties are bedroom windows, which are less sensitive.
- 10.8 It is also important to balance the overall benefits of optimised housing supply when considering the potential for amenity impacts on neighbouring properties.
- 10.9 In addition, the proposals include the provision to properties within Gilbeys Yard of additional private rear garden space; such space to be provided in perpetuity or until such time as Gilbeys Yard is redeveloped; at which point it the land would revert for use as part of the communal amenity space for block E1 residents.
- 10.10 By virtue of the separation distances and relative position of block E1 and the closest properties within Gilbeys Yard, there is not a significant material impact on outlook from the proposals.
- 10.11 The room usage of facing rooms within Gilbeys Yard (predominantly bedrooms) makes the majority of these rooms less sensitive to amenity impacts.
- 10.12 The design, position and orientation of Block E1 has undergone significant design development as a result of public consultation and engagement with LBC. As a result, there are no proposed south-facing windows on the lower five floors of block E1 and the side elevations of the private balconies within block E1 will be treated with privacy screens in order to prevent direct views towards Gilbeys Yard, whilst ensuring good daylight penetration to the proposed properties (with outlook to the east and west from the proposed private amenity areas). No direct overlooking will be caused by Block E1.

Block E2

- 10.13 Block E2 runs along the rear of Gilbeys Yard and comprises three storey and five storey elements. In order to minimise amenity impacts, the closer parts of the building are limited to three storeys whereas the five storey elements are located where there is a more significant separation.
- 10.14 It should be noted that Gilbeys Yard is located relatively close to the property boundary and as a result of this properties within Gilbeys Yard will be more affected by redevelopment of the neighbouring site than would otherwise be the case with a more significant set back from the boundary. Given the need to optimise the redevelopment of the site it should be accepted that there will be some degree of effect on amenity.
- 10.15 The minimum distance between building E2 and properties within Gilbeys Yard is approximately 14.5 – 15m depending on the point of measurement. This relates to the distance between the rear facing kitchen windows of units E2-11 and E2-10. The minimum distance to the taller properties, units E2-1 – E2-6 is 18m and greater (18m in relation to unit E2-6).

10.16 Whilst CPG6 seeks an 18m separation distance, this relates to directly facing habitable room windows. In this respect it is noted that:

- At ground floor proposed boundary treatments will mitigate any privacy impacts
- On the upper floors, units E2 7-11 have rear-facing single bedrooms.
- The private external amenity spaces of units E2 7 – 11 are recessed in order to minimise perceived overlooking.
- The proposed homes do not align with the site boundary whereas Gilbeys Yard does and therefore the windows will not be directly facing.
- The internal layout of E2 minimises direct overlooking and privacy impacts: the ground floor rear facing windows of the closest homes (units E2-7 to E2-11) are kitchens, with the main living rooms fronting into the development site, onto Winding Vault Way. The design of these rear windows also responds to the need to mitigate amenity impacts.

10.17 *Juniper Crescent*

10.18 The closest part of Block A to buildings within Juniper Crescent is separated by approximately 24 m and this relates to the more slender and taller 14 storey element. This distance is across the public realm of the access road and footways and is not relating to more sensitive areas such as private gardens. Block A is not therefore considered to give rise to any material impacts with regards to the privacy of the occupants of Juniper Crescent.

10.19 With regards to outlook, the separation distance is considered to allow for sufficient outlook such that the proposals will not engender a sense of enclosure.

Daylight and sunlight

Development Plan policy

10.20 Policy A1 establishes that the impact of a development proposal on sunlight and daylight levels experienced by the occupants of surrounding residential properties should be considered in the design and layout of proposals.

10.21 London Plan policy 7.6 sets out that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, in particular residential buildings, including through overshadowing. London Plan policy 7.7 establishes that taller buildings should not adversely impact on surrounding properties including as a result of overshadowing and reflected solar glare.

Material considerations

10.22 The key material planning consideration will be the Building Research Establishment report *Site Layout Planning for Daylight and Sunlight: A Good Practice Guide* 2nd Edition (2011).

10.23 However, it should be noted that the BRE guidance should be interpreted flexibly, particularly within an urban context.

10.24 The GLA Housing SPG paragraph 1.3.45 notes that:

1.3.45 An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves.

*13.46 The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. **Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.** [emphasis added]*

10.25 CPG 6 paragraph 6.5 notes that:

While we strongly support the aims of the BRE methodology for assessing sunlight and daylight we will view the results flexibly and where appropriate we may accept alternative targets to address any special circumstances of a site. For example, to enable new development to respect the existing layout and form in some historic areas. This flexible approach is at the Council's discretion and any exception from the targets will be assessed on a case by case basis.

10.26 The draft LBC Local Plan sets out, in policy A1, that daylight and sunlight will be considered in terms of the quality of life of occupiers and neighbours and with regards to the amenity impacts of development.

Assessment

10.27 The implications of the scheme for daylight and sunlight to surrounding properties have been assessed in detail following the guidelines of the British Research Establishment. Properties within Juniper Crescent, Gilbeys Yard, Camden Lock Place, Chalk Farm Road and Gloucester Avenue have been assessed. The amenity areas associated with Juniper Crescent have been assessed.

10.28 The key tests are as follows, as per table 10.2 of ES chapter 10:

- VSC: A window may be adversely affected if its VSC measured at the centre of the window is less than 27% and less than 0.8 times its former value.
- NSL: A room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area.
- APSH: A window may be adversely affected if a point at the centre of the window received for the whole year, less than 25 % of the APSH including at least 5 % of the APSH during the winter months (21st September to 21st March) and less than 0.8 times its former sunlight hours during either period, and for existing

neighbouring buildings, if there is a reduction in total APSH which is greater than 4 %.

Vertical Sky Component and No Sky Line

- 10.29 A total of 365 windows serving 291 rooms were assessed for daylight within 33 buildings/properties. For VSC, 127 (35 %) out of the 365 windows assessed would meet the BRE criteria and for NSL, 141 (48 %) of the 291 rooms assessed would meet the BRE criteria.
- 10.30 The nine properties highlighted green within Table 10.5 would not experience a noticeable alteration (less than 20 %) in the levels of daylight it receives with the completed proposed development in place and it is considered that these properties would experience a negligible effect. The remaining properties would experience noticeable effects and are discussed below.
- 10.31 It must be noted that where the uses of the affected rooms are unknown, there is a possibility that some rooms are non-habitable i.e. bathrooms and hallways or are rooms considered less sensitive to daylight such as bedrooms within the BRE Guidelines.

Juniper Crescent

- 10.32 Juniper Crescent, due to its location immediately to the north of the Application Site, is likely to be materially affected in terms of sunlight and daylight.
- 10.33 There would be reductions in VSC in excess of the standard recommended 20% change and 27% VSC value and in excess of the standard recommended 20% reduction. However, despite this the overall level of light would be generally considered reasonable within an urban environment. In relation to those windows not complying with the standard numerical guidelines set out by the BRE the following is noted:

54-64 Juniper Crescent

- All six non-compliant windows would still retain VSC levels in excess of 22%
- The affected room with regards to NSL criteria would retain a daylight distribution of 72%

69-78 Juniper Crescent

- All 21 non-compliant windows would retain VSC levels in excess of 17%
- All rooms affected by NSL infractions would retain daylight distribution levels in excess of 52%

79-84 Juniper Crescent

- All 18 non-compliant windows would retain VSC levels in excess of 18% VSC
- All 12 non-compliant rooms would retain daylight distribution levels in excess of 60%.
- 8 windows in 83 and 84 Juniper Crescent were assessed

85-92 Juniper Crescent

- All 16 tested windows would be non-compliant with the standard numerical tests; however, all 16 would retain at least 17% VSC.
- 14 rooms would be non-compliant with regards to NSL but all would have daylight distribution of at least 62%.

93-101 Juniper Crescent

- All 16 windows would be non-compliant with regards to VSC; however, 15 of these would retain VSC levels in excess of 15% [so there is one room <15%]. All of these windows serve bedrooms.
- All 16 rooms would be non-compliant on NSL criteria but all rooms would have daylight distribution exceeding 52% and in some cases up to in excess of 76%.

101-107 Juniper Crescent

- 17 windows would be non-compliant on VSC; however, all would retain VSC levels in excess of 15%.
- Four rooms would not comply on NSL but would retain daylight distribution levels in excess of 55%.

Gilbeys Yard

- 10.34 Gilbeys Yard is sited to the south / south-east of the Application Site but will nevertheless be affected by material impacts on daylight and sunlight.

Gilbeys Yard Block A

- 71 windows would be non-compliant with BRE numerical targets; however, the majority of windows would retain VSC levels in excess of 15%.
- 31 rooms would not meet NSL criteria but a significant number [not the majority] would retain daylight distribution levels in excess of 52%.

Gilbeys Yard Block B

- All 61 tested windows would be non-compliant with regards to VSC; however, all windows would retain a VSC in excess of 15%.
- 54 rooms would not meet NSL guidelines but would retain daylight distribution levels in excess of 50%.

Annual Probable Sunlight Hours

- 10.35 151 of the 159 windows within surrounding sensitive receptors (95%) would meet the BRE criteria for both winter and total APSH.
- 10.36 With regards to those windows that would not meet the BRE criteria:

Juniper Crescent

- Six windows would be non-compliant with the numerical criteria; however, all of these windows would meet the overall criteria of 25% APSH and the majority of these windows would have 4% winter APSH, which falls just short of the recommended 5%.

Camden Lock Place

- The two affected windows would meet ASPH winter criteria, in terms of % change, but would experience below 5% winter ASPH and below 25% overall ASPH due to its existing condition.

Transient overshadowing

- 10.37 The proposed development is considered to give rise to a limited amount of transient overshadowing to the communal amenity space and private gardens within Juniper Crescent. In March there will be some shadowing but this moves in accordance with the sun path. In June the effect is similar but more limited. In December the proposals will add to existing shadowing of the communal area but not the private gardens.
- 10.38 Overall, these impacts are not considered to give rise to a material impact on amenity.

Conclusions on daylight and sunlight

- 10.39 The Application Site has limited low-level massing and does not impact materially upon the sunlight and daylight experienced by surrounding properties. Surrounding residents therefore experience unusually high levels of daylight and sunlight within a central urban location. Daylight and sunlight impacts from proposed redevelopment of the Application Site are therefore unavoidable whilst ensuring that the site is optimised in terms of its contribution to the supply of new homes and new non-residential floorspace.
- 10.40 Overall and in the context of a central London location (as defined by the London Plan) the level of compliance with the BRE guidelines is considered to be acceptable and appropriate. It should be acknowledged that the BRE guidelines are not written specifically in relation to urban locations and that the guidelines themselves advocate a flexible approach.
- 10.41 Indeed, paragraph 1.6 of the BRE guidance *Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice* (2011) notes:
- The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer.*
- 10.42 The amenity impacts likely, in terms of daylight and sunlight, should be balanced against the planning benefits of the proposals and other material considerations including the likely future redevelopment of both Juniper Crescent and Gilbeys Yard, albeit that the level of impact must be acceptable on the conservative assumption of no redevelopment of these sites and in consideration of the occupants of those properties during the interim period.
- 10.43 Given the overall balance of the sunlight daylight results, which indicate reasonable levels of sunlight and daylight post-development, particularly within an urban environment, and accounting for the significant planning benefits of the scheme and the importance of optimising the contribution of the site in providing much needed new homes and commercial floorspace, we consider that the proposals should be supported by LBS with regards to daylight and sunlight impacts, in accordance with relevant provisions of the Development Plan and relevant material considerations.

Noise and vibration

Development Plan

- 10.44 London Plan policies 5.3 and 7.15 establish the requirement to minimise noise pollution and to mitigate any potential adverse impacts arising from development, albeit without placing unreasonable restrictions on development.
- 10.45 Local Plan policy A4 sets out the requirement to avoid noise pollution and to mitigate where necessary to achieve an acceptable noise environment. Policy A4 refers to Noise and Vibration Thresholds, which are set out within the Appendix of the plan. Planning permission will not be granted for developments likely to generate unacceptable noise and vibration impacts, or noise sensitive development in locations which experience high levels of noise, unless appropriate attenuation measures can be provided.
- 10.46 Operational and construction noise is a consideration. Operational noise will include delivery vehicles.

Material considerations

- 10.47 Camden Planning Guidance 6 (2001) sets out more detailed guidance with regards to designing out and mitigating noise impacts. LBC's noise hierarchy is: reduce the noise at its source; separate the development from the noise source or to use barriers; and use of construction material such as acoustic glazing.
- 10.48 The GLA's SPG on Sustainable Design and Construction is also relevant.

Assessment

- 10.49 The Noise and Vibration ES chapter, and the Noise and Vibration Impact Assessment Report, produced by Ardent, set out the current baseline noise conditions, the impact of the development and the noise environment for future occupants and neighbours.
- 10.50 A noise and vibration survey was undertaken in July 2016. The Application Site is in a busy urban location with numerous noise sources in the immediate vicinity, including road, rail and entertainment noise.
- 10.51 For the purpose of the assessment the temporary supermarket and office use on PFS parcel, together with the demolition and construction of the MS parcel have been identified as the worst-case scenario, in terms of noise generating operations.
- 10.52 The assessment modelled the suitability of the site for proposed residential use, using a future baseline of 2024, which incorporated cumulative schemes and projected traffic flows.

Construction impacts

- 10.53 Provision has been made for noise and vibration monitoring during demolition and construction works albeit that noise and vibration will be unavoidable during certain parts of the construction process.
- 10.54 Construction traffic noise can be adequately managed through a Construction Management Plan.

- 10.55 Based on the level of ambient noise measured at the Application Site, the effects of construction noise due to cumulative schemes would be effectively masked by the existing noise due to railway traffic, road traffic and commercial uses.

Residential environment

- 10.56 Existing noise levels in the area exceed the requirements of BS8233:2014 in relation to external balconies. However, the BS guidance notes that, in higher noise areas, a balanced view should be taken between noise exceedance and the benefits of redevelopment.
- 10.57 Residents of the new homes will have access to private balconies, which will in some instances exceed noise criteria, but they will also have access to shared private amenity spaces. In the majority of cases, noise to these spaces has been minimised by placing amenity space at inward facing sheltered areas screened from railway, road and entertainment venues.
- 10.58 All residential units are proposed to have mechanical ventilation. This would maximise the performance of the external facade and glazing, as penetrations through the building façade would be minimised. Windows would be openable however for purge ventilation.
- 10.59 For outward facing residential windows close to the railways, high performance acoustic double glazing in conjunction with a mechanical ventilation system would achieve the required internal noise levels. In all cases fenestration and façade treatments would comply with the recommendations of the noise report to ensure a suitable internal noise environment for residents.
- 10.60 A glazing assessment has been undertaken in order to ensure measured ambient noise levels at the site are sufficiently reduced by the building facade to provide a suitable residential environment.

Commercial operations and plant

- 10.61 The assessment sets out suitable noise emissions criteria for plant and sets out mitigation where appropriate.
- 10.62 Delivery vehicles and other commercial vehicle movements should be managed (through a servicing management plan) during construction and operational phases in order to minimise impacts to within daytime hours. This can be conditioned.
- 10.63 With regards to bus stop noise, the noise report does not indicate any material impacts on residential amenity. It is considered that the differential impact of the bus stops and stands as opposed to buses passing by is likely to be negligible and it is noted that the position of the proposed bus stops, whilst closer than the existing position to properties on Juniper Crescent, will benefit from a degree of screening as a result of the road cutting.

Conclusions on residential amenity

- 10.64 Whilst it is acknowledged that there will be a limited level of impact on the existing properties, within Gilbeys Yard in particular, the impact is considered to be reasonable and to be appropriately minimised, particularly within the context of the overall planning

benefits of an optimised redevelopment scheme at the subject site. The proposals are not considered to give rise to significant material impacts on amenity.

- 10.65 Additionally, the likely redevelopment of Gilbeys Yard (and indeed Juniper Crescent) in future years is a material consideration albeit not one that this arrangement relies upon in order to ensure an acceptable scheme.
- 10.66 As such, the proposals are considered compliant with relevant provisions of the Development Plan and material considerations in this respect.

11. Transport and Infrastructure

Transport infrastructure

Development Plan policy

- 11.1 London Plan policy 6.3 notes that development proposals should ensure that impacts on transport capacity and the transport network are fully assessed. Development should not adversely affect safety or capacity of the transport network. It is also necessary for the cumulative impacts of development on transport infrastructure to be taken into account.
- 11.2 London Plan Policy 6.10 sets a requirement for high quality pedestrian environments and cross refers to TfL's Pedestrian Design Guidance.
- 11.3 Local Plan policy T1 seeks to ensure that developments improve the pedestrian environment by supporting high quality public realm improvement works, providing high quality footpaths and pavements that are easy and safe to walk through, ensuring that they are adequately lit.
- 11.4 Policy T2 seeks to limit the availability of parking and require all new developments in the borough to be car-free. On site parking should be limited to accessible spaces where necessary, and/or essential operational or servicing needs.
- 11.5 LBC supports the London Cycle Hire Scheme.
- 11.6 Policy T4 refers to the sustainable movement of goods and materials and sets out an aim to minimise the movement of goods and materials by road. Developments over 2,500 sq m should prioritise use of the Transport for London Road Network or other major roads and accommodate goods vehicles on site. Planning applications for these larger developments should provide a Construction Management Plan, Delivery and Servicing Management Plan and Transport Assessment.

Parking

- 11.7 London Plan policies 6.9 and 6.13 and accompanying tables 6.2 and 6.3 set out car and cycle parking requirements of the London Plan.
- 11.8 Table 6.2: Car Parking Standards in the London Plan sets out the maximum car parking standards for development in London. For retail uses it notes that 6% of the total capacity should be allocated to disabled motorists. 10 per cent of all spaces must be for electric vehicles with an additional 10 per cent passive provision for electric vehicles in the future.
- 11.9 For residential use, all developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit. Adequate parking spaces for disabled people must be provided preferably on-site. 20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

- 11.10 Cycle parking should be secure, integrated, convenient and accessible. Table 6.3 notes that cycle parking areas should allow easy access and cater for cyclists who use adapted cycles. It is noted that all cycle parking should be consistent with the London Cycling Design Standards, or subsequent revisions, notably that at least 5% of cycle parking spaces will be easily accessible with some spaces will be larger to accommodate adapted cycles or bicycles.
- 11.11 Local Plan policy T2 states that LBC will minimise the provision of private parking in new developments though car free developments in accessible locations. Low emissions vehicles are also promoted.
- 11.12 Developments should provide the minimum necessary car parking provision. The Council expect developments to be car free in Camden Town Centre. Within car free schemes, accessible car parking should be provided and parking is permitted in relation to operational and servicing needs.
- 11.13 Car and Cycle parking should comply with London Plan standards, as set out in Local Plan policy T1

Material considerations

- 11.14 CPG 7 (Transport) provides detailed guidance in relation to a range of transport considerations.
- 11.15 The Draft Camden Goods Yard Framework aims for development of the site to create a place that is well connected and accessible to all; that prioritises pedestrians and cyclists, is easy to navigate and connects with public transport, reducing the need for vehicles. The Framework is clear that permeability through the site should be improved and that the site should allow connections with the wider area (refer to section 6 of this assessment).

Assessment

- 11.16 The transport section of the Environmental Statement (ES) and the submitted Transport Assessment provide the technical and detailed assessment of transport considerations relevant to the proposals.

Public transport impact

- 11.17 There are a number of bus stops situated within close proximity of the Application Site including bus stops/ waiting areas adjacent to the Morrisons supermarket and beyond the Application Site on surrounding roads, including Chalk Farm Road.
- 11.18 The site is located between the London Underground stations of Camden Town (approximately 600m to the south-east) and Chalk Farm station (approximately 350m to the north-west). The nearest rail station accessible on foot is Kentish Town (approximately 800m walking distance to the north).
- 11.19 With respect to public transport impact, Table 7.7 in the ES transport chapter predicts that the proposals would generate up to 459 additional peak hour public transport passenger trips, comprising 100 bus passengers, 272 underground passengers, and 87 train passengers.

- 11.20 Given the capacity and frequency of existing services and the limited additional impact of the proposed development it is not considered likely that significant material impacts will arise.
- 11.21 Replacement bus stops and stands would be provided in the form of laybys on Juniper Crescent. This would comprise laybys with space for 2 buses on either side of the carriageway, plus a fifth bay on the northbound exit from the roundabout to act as an overflow waiting area when required.
- 11.22 The proposed replacement bus stops have been designed in consultation with both TfL and LBC, and are understood to be acceptable in principle. Bus services at the site will benefit from the improved configuration of bus stops and stands and the more direct road route to Chalk Farm Road, without making use of the slip road around the PFS.
- 11.23 Overall it is considered that the above increases are unlikely to result in significant capacity issues on public transport services. TfL has indicated that they will review demand against service capabilities once the application has been submitted.

Local highway impact

- 11.24 The Transport Assessment includes a review of the nearby cumulative developments, and has concluded that no allowance for any traffic movements associated with these schemes is required. This is on the basis that most of these schemes are car-free, and whilst there are some with minor net traffic increases, there are also schemes resulting in net reductions in traffic, and on balance any changes to flows near the Application Site would be negligible.
- 11.25 In addition and as per LBC's comments in its ES Scoping Opinion, consideration has also been given to the potential impacts on Gilbeys Road and Oval Road. These roads do not provide any link into the Application Site for vehicular traffic; however the existing pedestrian/cyclist link at this location would be retained. This presents the possibility of some taxi trips associated within the proposed development occurring from this direction, especially for trips to the south. However, the proposed development is only predicted to generate up to 12 peak hour taxi trips, and it is considered that the waiting times of these vehicles at this location would be minimal. Given that these roads fall outside of the applicant's control, there are no specific measures that can be implemented to prevent taxis using this road (as they already do). However, the flows are sufficiently low to conclude that the effects would be negligible.
- 11.26 Additional details regarding highway impact is set out in the supporting Transport Assessment.

Junction alterations

- 11.27 The signalised junction of the site access with Chalk Farm Road (and Ferdinand Street) will be remodelled in order to improve the pedestrian and cyclist experience. The slip-road around the PFS parcel, which currently forms the site egress, will henceforth only be used to serve the PFS itself.
- 11.28 The junction alterations and the impact of the development would increase average driver delays on Chalk Farm Road by up to 28 seconds, with a small reduction in delays on Ferdinand Street. These results do not reflect the loss of queues and delays

associated with the existing additional site egress however. On balance it is considered that there would not be material impacts on the operation of this junction in terms of capacity and delays.

- 11.29 The proposals for the Chalk Farm Road signal junction have been produced in consultation with LBC (including Transport Strategy Team) and TfL, with a view to accommodating LBC's aspirations where possible.
- 11.30 The benefits of this junction remodelling should also be taken into account, including pedestrian environment improvements, such as pedestrian crossings, including a Zebra Crossings on Juniper Crescent, the introduction of a cycle lane and cycle-specific signalised junction. The promotion of this cycle link is a key aim of LBC and this is set out within the draft Planning Framework.
- 11.31 The proposed reconfiguration of the Chalk Farm Road/Ferdinand Street/Juniper Crescent signal junction would be implemented at the beginning of the demolition and construction stage, as would delivery of the new bus lay-bys on Juniper Crescent to replace the existing bus terminus, along with two Zebra crossings. A pedestrian refuge crossing would also be provided at Chalk Farm Road (west).

Cycle Routes

- 11.32 The provision of the potential north/south cycle connection between Ferdinand Street and Juniper Crescent would facilitate part of a wider cycle route through the site, connecting Chalk Farm Road to the north with Oval Road to the east, via the existing pedestrian/cyclists link through Gilbeys Yard. This route would follow Juniper Crescent and the surface level access road within the site, which would provide a slow-speed shared surface environment suitable for cyclists.

Car parking

- 11.33 The development will be predominantly 'car free' with the exception of foodstore parking and wheelchair accessible parking for the residential units.
- 11.34 The existing foodstore has 425 car parking spaces; this will be reduced to 300 spaces which is considered to be the minimum operational requirement and is a significant reduction. The other non-residential floorspace will not have associated parking.
- 11.35 The new homes will be car-free, except for 20 accessible spaces: 10 on street, along The Cuttings and Roundhouse Way, and 10 undercroft within Block F.
- 11.36 The PFS parcel temporary foodstore will have 61 car parking spaces. The standard maximum provision in the London Plan for foodstores up to 2,500sqm is one space per 45-30sqm in PTAL 5/6 locations, which equates to a standard maximum of 48 spaces. The proposals exceed this maximum however this would be a temporary situation, and the excess parking is proposed to ensure that Morrisons can maximise parking for customers in this interim period, so as to avoid existing customers having to use other competing stores, thereby ensure future custom for the replacement store once completed. TfL has confirmed that this level of parking would be acceptable for the temporary store. The four proposed disabled bays equates to 6% of the total capacity, as per the requirements of the London Plan.

- 11.37 The PFS in its permanent condition will have four car parking spaces, which is the minimum necessary given the proposed use.
- 11.38 All of the other uses at the site would be 'car-free', in accordance with Policy T2 of the draft LBC Local Plan.
- 11.39 The proposed residential development would include 57 wheelchair accessible units (10% of all units). A total of 20 residential disabled parking bays are proposed, comprising a mixture of 10 on-street bays within the site, and 10 bays below Block F. This is considered an appropriate level of provision given the support for car free developments in locations accessible by a range of transport options.
- 11.40 Electric vehicle parking will be provided in compliance with London Plan Table 6.2 incorporating 30 active EVCPs and 30 passive spaces for the foodstore, and four active and four passive spaces for the residential.

Cycle parking

- 11.41 Proposed cycle parking provision is set out below in Table 11.1.

Table 11.1: Cycle parking

Parking location	Existing		Proposed		Notes
	<i>Visitor</i>	<i>Long-stay</i>	<i>Visitor</i>	<i>Long-stay</i>	
PFS			16	46	Long stay is for PFS office
Foodstore	48				
Residential			-	912	Includes 84 accessible 64 general use visitor spaces (below column)
Main site			64	73	Long stay for commercial space 64 general use visitor spaces
Cycle hire			32		

Long stay

- 11.42 The proposed 912 residential long-stay spaces will exceed the London Plan requirement for 1 space per 1 bed dwelling and 2 spaces for larger dwellings.
- 11.43 The proposed 73 cycle spaces within the main site meet the London Plan requirements for the foodstore, office and workspace uses (1 space per 175 sq m foodstore, 1 space per 90 sq m office and workspace).

11.44 46 spaces are provided for the PFS office space in accordance with the 1 space per 90 sq m requirement.

11.45 84 of the residential cycle spaces will be provided as accessible stands.

Short stay

11.46 64 visitor spaces will be provided in the main site and 16 within the PFS, exceeding London Plan requirements, as set out within the Transport Assessment.

Cycle hire

11.47 In accordance with a request from TfL during pre-application discussions, TfL cycle hire docking stations for 32 cycles will be provided within the main site. This will be secured by a financial payment to be set out within the Section 106 legal agreement.

Pedestrian environment

11.48 The key routes likely to be used for walking (and cycling) trips to and from the proposed development are:

- Juniper Crescent / the site access road;
- Chalk Farm Road (between Chalk Farm and Camden Town underground stations to the east and west), and
- Oval Road.

11.49 The footways extending on both sides of the road from Chalk Farm Road on both sides of the Application Site measure between 2-4m wide. The south-east footway provides direct access to the Application Site via two footpath links, and a Zebra crossing is located outside of one of these links on the access road, providing a convenient crossing opportunity for pedestrians using the opposite footway.

11.50 The alternate route into the Application Site is via a footpath link to the south-eastern edge of the supermarket car park, which links to footways on Oval Road.

11.51 The surrounding area includes a comprehensive network of footways and crossings along key routes, including footways on both sides of Chalk Farm Road and signal controlled junctions in the vicinity of the Application Site.

11.52 The surrounding pedestrian environment is classified as good. The new public realm proposed within the site and proposed footway widening at the eastern edge of Juniper Crescent (to 3m) below the railway bridge improve the already good pedestrian environment. Accordingly, no further mitigating improvements are deemed to be necessary to accommodate the increased flow of pedestrian movements resulting from the proposals.

11.53 Furthermore, the proposed site access arrangements incorporate pedestrian crossing phases into the Chalk Farm Road/ Ferdinand Street/site access junction, plus there is a zebra crossing provided along the site access road to facilitate access to destinations to the west of the site and more locally to the proposed bus pickup layby.

- 11.54 It is considered that the pedestrian environment is retained and enhanced to deliver high quality network of pedestrian access to, from and within the site.

Managing Transport Impacts

Servicing

- 11.55 A draft Servicing Management Plan accompanies the planning application documentation. This document sets out an indication of the anticipated number and timing of delivery and servicing movements for the proposals. It is anticipated that an operational SMP will be required by condition.
- 11.56 The SMP provides a framework to manage all delivery and servicing movements to and from the site. The benefits of an effective SMP include minimising environmental impact and the safeguarding of highway users, the SMP will:
- enable proactively management of deliveries, to minimise the number of delivery and servicing trips, particularly in the weekday morning peak period;
 - identify and promote areas where safe and legal loading can take place; and
 - select delivery companies that can demonstrate commitment to following best practice, such as the Freight Operator Recognition Scheme (FORS).
- 11.57 Service vehicles associated with the existing superstore, including delivery vehicles and refuse collections, currently utilise an access road along the southern store boundary, north of the railway lines. This access is controlled by gates, and leads to a service yard including loading bays at the southern edge of the building.
- 11.58 The majority of delivery/servicing movements associated with the proposed new homes will comprise postal deliveries on a daily basis, with the occasional infrequent delivery of bulky items such as furniture and white goods. There may also be some internet shopping deliveries which usually deliver by LGVs (<3.5 tonnes).
- 11.59 Delivery and servicing movements associated with the offices are anticipated to largely comprise stationery, postal and courier trips whilst a number of articulated and large rigid vehicles are anticipated to serve the Morrisons store. The frequency and number of vehicles associated with the supermarket is unlikely to change materially under the proposals.
- 11.60 Appropriate space has been incorporated around the site to accommodate the size of vehicles that could typically be anticipated.
- 11.1 Access to the site from the improved junction onto Chalk Farm road will be facilitated by the junction layout, which accommodates the swept paths of all types of vehicles likely to access the site. Large vehicles, including a typical refuse vehicle, are able to enter and exit the site from the access road from Chalk Farm Road, turn within the site where necessary and return to the local road network.
- 11.2 The servicing needs of the development can therefore be accommodated with significant material impacts on the safe and efficient operation of the highways network.

Travel Plans

- 11.3 A Travel Plan for both residential and non-residential land uses has been prepared for the proposed development. The Framework Travel Plan (FTP) sets out the framework for the implementation of use-specific Travel Plans prior to occupation, including the incorporation of any existing Travel Plan (TP) measures adopted by Morrisons at the current store. The FTP sets out a range of measures and SMART targets to ensure that single-occupancy car travel is minimised at the site, and that the use of sustainable modes is taken up by all users wherever possible.
- 11.4 The Travel Plan provides a package of measures to encourage staff and residents to use alternatives to single-occupancy car-use. The measures are as follows:
- Provision of secure cycle parking for residents, staff and visitors;
 - Regular monitoring of cycle parking use;
 - Promotion of the Cycle Hire scheme for residents to and from the Site;
 - Promotion of national travel initiatives (such as the Governments Cycle2Work scheme which provides tax savings for employees who purchase a bike for their journey to work) and organise site-wide 'Bike to Work' days;
 - Promotion of flexible working arrangements.
- 11.5 Furthermore, the Travel Plan proposes marketing and awareness raising strategies which would be implemented, namely:
- Distribution of travel information 'Welcome Packs' to all future residents and employees of the Proposed Development (to include maps, public transport routes and frequencies and details of local amenities); and
 - Display of Travel Plan posters and leaflets in reception areas, public notice boards and communal areas.
- 11.6 The implementation and funding of the Travel Plan would be secured by means of an appropriately worded planning condition or an agreed Section 106 obligation. The TP will be reviewed initially for 5 years from implementation, with TPC liaison with LBC's TP Officers regarding the success of the TP being undertaken as appropriate during the life on the TP.
- 11.7 The Travel Plan will augment the sustainable transport arrangements for the site, in particular the broadly car free nature of the scheme. The proposals are considered to represents sustainable development with regards to transport arrangements and will not have a significant material impact on the safe and efficient operation nor the capacity of transport infrastructure serving the site.

12. Environmental sustainability

Environmental Performance Targets

Development Plan Policies

- 12.1 London Plan Policy 5.2 and Local Plan policy CC1 encourage development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's Energy Hierarchy to be lean (use less energy), be clean (supply energy efficiently) and be green (use renewable energy). In accordance with this Policy, the Mayor has set out targets for carbon dioxide emissions reductions outlined in the Building Regulations. Residential buildings are expected to be zero carbon and non-domestic buildings are as per Building Regulation requirements.
- 12.2 Where it is demonstrated that targets for carbon dioxide emissions reduction cannot be fully achieved on-site the shortfall may be provided off-site.
- 12.3 London Plan policies 5.1--5.15, and Local Plan policies CC1- CC5 set out the following key requirements with regards to sustainable design:
- Requiring developments to incorporate the highest standards of sustainable design and construction measures (Local Plan policy CC1 and London Plan policy 5.3);
 - Minimising carbon dioxide emissions (residential target of zero carbon, commercial target as per Building Regulations) (Local Plan policy CC1, London Plan policies 5.2 and 5.3). The supporting text for policy CC1 sets out a requirement for 19% CO2 reduction below Part L 2013 Building Regulations for all residential developments;
 - Renewable energy on site, with a nominal target of 20% of emissions reductions where feasible (Local Plan policy CC1 supporting text and London Plan policy 5.7);
 - The use of decentralised energy where feasible, including consideration of district heating and cooling and combined heat and power. Site wide systems and connections beyond the site should be considered and connection to existing of planned networks, where feasible. In all case infrastructure to allow for future connectivity should be provided (Local Plan policy CC1 and London Plan policies 5.2, 5.5 and 5.6);
 - Address heating and cooling in line with the London Plan cooling hierarchy. The London Plan requires proposals to demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs (London Plan policies 5.8 and 5.9);
 - Require developments to reduce their water consumption by incorporating water efficient features so that mains water consumption would meet a target of 105 litres or less per head per day (plus 5 litres for external use (Local Plan policy CC3 and London Plan policy 5.15);

- Retaining and re-using surface water and grey water on site, limiting the amount and rate of run-off and waste water entering the sewer network, as well as incorporating sustainable urban drainage methods (SUDS) to reduce the risk of flooding (Local Plan policy CC3 supporting text and London Plan policy 5.15); and
- Developments are expected to integrate green infrastructure to contribute to urban greening, minimise overheating and surface water run off by including green or brown roofs where feasible (Local Plan policy A2 supporting text and London Plan policies 5.9, 5.10, 5.11, and CPG3).
- Developments are encouraged to use the Home Quality Mark and Passivhaus design standards and 'Excellent' BREEAM standards. (Local Plan policies CC1 and CC2).
- Developments are encouraged to assess the embodied carbon emissions associated with construction materials (Local Plan policy CC1).
- Applications should include a full model assessment of the building to ensure the buildings design optimises solar gain and daylight without resulting in overheating (CPG3). Local Plan policy CC2 refers to a requirement for dynamic thermal modelling to demonstrate that any risk of overheating has been mitigated.

Material Considerations

- 12.4 The Mayor's SPG on Sustainable Design and Construction (2014) and LBC's Sustainability Planning Guidance (CPG3) generally contain similar provisions to those summarised above from the Development Plan.
- 12.5 CPG 3 notes that the LBC expects to achieve a greenfield surface water run-off rate once SUDS have been installed and as a minimum surface water run-off rates should be reduced by 50% across the development.

12.6 Planning Assessment

- 12.7 The proposals for Camden Good's Yard have been developed following consideration of Development Plan policy and relevant material considerations. A Sustainable Design and Construction Statement, and an Energy Statement prepared by BBS Environmental accompanies this submission and provides further information
- 12.8 The development has been assessed against Part L1A and 2A of the 2013 Building Regulations and the above Development Plan policies and material considerations.. The dwellings have been designed to exceed the requirements of Part L1A:2013 by means of insulation and energy efficiency measures ('Be Lean') which include:
- reduced U-values for external walls, roofs, floors and windows;
 - careful detailing of non-repeating thermal bridges to reduce the linear thermal transmittance figures as far as possible;
 - careful detailing to create a robust airtight building envelope for each dwelling with an air leakage rate of <4m³/hour/m²;

- optimised window sizes to avoid overheating;
- low energy lighting throughout the development using “A” rated low energy lamps;
- automatic controls using PIR or daylight sensors for all common areas and external lighting, including ancillary areas;
- high performance hot water cylinders with declared loss factors of less than 0.01 kWh/L/day, and
- high efficiency EST “best practice compliant” mechanical balanced ventilation systems with heat recovery and summer bypass.

12.9 The commercial element will achieve BREEAM Excellent.

12.10 These measures will enable the both the dwellings and the non-residential buildings to achieve compliance with the current Building Regulations, Part L1A: 2013 prior to the addition of low and zero carbon technologies.

12.11 The possibility of connecting to an existing district heating network was considered but a review of existing schemes revealed that there are none within a reasonable distance of the site, with the closest network located in Gospel Oak. The 2015 Heat Mapping Study has identified that there is sufficient heat demand density around Kentish Town for the possible expansion of the Gospel Oak network. Whilst the Application Site falls outside of this area, the proposed development could pose as a material consideration to the commercial feasibility of this network. As such, the necessary space will be allowed within the local Energy Centre to permit a future connection to be made in accordance with policy.

12.12 All of the residential buildings and the non-residential space on the main site will be heated by a community heating system with condensing gas boilers and gas Combined Heat and Power (CHP) unit (‘Be Clean’) in accordance with policies CC1 and LP5.2. The Energy Centre will be located in the basement below Block A. The new PFS building will require both heating and cooling, plus minimal demand for hot water, all of which can be provided by Air Source Heat Pumps (ASHPs).

12.13 Each dwelling will be equipped with a high performance heat recovery ventilation system and a heat interface unit. The commercial space on site will also be provided with heat for space heating and hot water from the communal heating system. Comfort cooling will be provided to a proportion of the residential and non-residential units including the PFS site using local roof mounted air source heat pump (ASHP) chillers. Comfort Cooling will contribute only 0.54% of total site emissions; cooling will be provided for all market homes that have two or more bedrooms, plus 46 south and south-west facing market one bedroom units. In total 277 market units will have Comfort Cooling.

12.14 With regards to renewable energy, the only feasible renewable energy systems would be roof mounted photovoltaic (PV) panels (‘Be Green’). Due to the design of the roofs of some of the blocks being pitched or sloped, the area for PV panel arrays is limited on those buildings. Despite this, a substantial amount of PV panel arrays are proposed

across the development contributing to a significant reduction in carbon dioxide emissions, these are located across most of the residential blocks and on the PFS site commercial building with the exception of Block B in accordance with the Local Plan. There will be 600 PV panels generating a total nominal rating of 165 kWp.

Carbon Dioxide savings

- 12.15 The combination of the energy efficiency measures, the CHP unit, the ASHPs and the PV panels will reduce carbon emissions by 35.17% over Part L of the Building Regulations. This total saving is achieved through efficiency measures, the CHP unit and renewable energy. Full details of these calculations are detailed within the Energy Statement. Against this background, the proposals are compliant with the Development Plan.

Overheating

- 12.16 The SAP Overheating Calculation indicated that the highest risk of overheating in any apartment fell into the lowest two categories as being 'not significant' or 'slight' and is therefore in accordance with CPG3 and Local Plan policy CC2. No risk of overheating was identified in the units in part due to the considerate design of the buildings in line with the cooling hierarchy having windows with deep reveals, balcony overhangs to provide significant summer shade, solar control glazing, and passive ventilation.

- 12.17 Thermal modelling was carried out in accordance with *CIBSE TM52: The limits of thermal comfort*. Block F was modelled because this block contains a variety of different apartment types and sizes, and is located on the western edge of the site and therefore does not benefit from solar shading from other buildings within the Application Site. The assessment demonstrates that all dwellings will comply with the recommendations in CIBSE TM52 and reliance on comfort cooling is therefore not required. Comfort cooling is however proposed for a proportion of the new homes in order to respond to market expectations. The emissions relating to comfort cooling plant have been assessed and the scheme is able to achieve policy compliance with comfort cooling included.

Water consumption

- 12.18 A range of water conservation measures will be implemented to reduce the calculated residential water consumption to below 105 litres per day for each resident, and each dwelling will have access to an individual water meter to monitor this. The landlord's areas and the individual tenanted commercial units will be similarly metered, and all non-residential sanitary facilities will use low-water fittings in accordance with BREEAM guidance.
- 12.19 Grey water recycling was explored but it is not feasible in complex building built over a basement due to the space required for the additional separated soil pipe systems, and for the waste water treatment plant required.
- 12.20 A rainwater harvesting system will be installed in Block C to collect rainwater to be used to irrigate areas of soft landscaping that require regular irrigation. This has been limited to this block as the remaining blocks have deep-substrate green roofs and the run-off from rainfall will be limited, as such utilising rainwater harvesting for either both residential and commercial units have been discounted.

Carbon Dioxide offset

On-site measures maximise CO2 reductions as far as feasible. In addition, to achieve a nominal zero carbon rating for the residential element and to achieve compliance with the commercial target of 35%, 11,892 tonnes of CO2 are required to be offset, at an estimated cost of £2.16m.

Flood Risk Management and Drainage

Development Plan Policy

- 12.21 London Plan policy 5.13 requires compliance with flood risk assessment and management requirements set out in the NPPF and the associated technical guidance. Policy 5.13 also encourages sustainable urban drainage systems (SUDS) and states that developments should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 12.22 Local Plan policies CC2 and CC3 seek to minimise the potential for surface water flooding and require developments to reduce their water consumption. The policy and supporting text sets out that developments should incorporate water efficient features; retain and re-use surface water and grey water on-site; limit the amount and rate of run-off, and ensure that developments are assessed for upstream and downstream groundwater flood risks. Run-off from heavy rainfall can be reduced through the use of sustainable urban drainage systems (SUDS), including green and brown roofs, pervious paving and detention of ponds or tanks.

Material Considerations

- 12.23 The whole of the site sits within Flood Zone 1 in accordance with the Environment Agency Flood Map. The site is therefore at low risk of flooding.
- 12.24 Local Plan map 6 indicates that whilst the site is not within a local flood risk zone, the area directly west has been designated as such. These are defined as discrete areas of flooding that do not exceed the national criteria for a 'Flood Risk Area' but still affect houses, businesses or infrastructure. The Site is not located in a groundwater Source Protection Zone (SPZ), however the closest being a SPZ 2 located approximately 400m south-west of the Site.
- 12.25 Camden's Strategic Flood Risk Assessment (SFRA, 2014) does however identify the site as sitting a Critical Drainage Area, adjacent to the Local Flood Risk Zone of Primrose Hill.
- 12.26 The closest source of fluvial or tidal flooding to the Site is the River Thames, approximately 4.2km to the south of the Site, whose extents of flooding do not pose a threat to the Application Site.
- 12.27 Camden Planning Guidance 3 states that the developments should achieve a greenfield surface water run-off rate once SUDS have been installed; as a minimum surface water run-off rates are expected to be reduced by 50% across the development.
- 12.28 The Mayoral Sustainable Design and Construction SPG highlights the need for developers to maximise all opportunities to achieve greenfield runoff rates and for developments to be designed to be flexible and capable of being adapted to and

mitigating the potential increase in flood risk as a result of climate change. The London Green Grid SPG further indicates that the inherent functions of green infrastructure in managing the risk of flooding such as increased green cover, including green roofs, pocket parks and rain gardens.

Planning Assessment

- 12.29 A Flood Risk Assessment and Drainage Strategy prepared by AECOM accompanies this submission, given that the site is larger than 1 ha.
- 12.30 Overall, the flood risk from surface water is assessed to be medium, though there is potential for limited pooling in the existing car park and within the public highway underneath the railway bridge and affecting the PFS parcel.
- 12.31 Flood risk from sewers and flooding from artificial sources has been assessed to be low.
- 12.32 The SFRA indicates no historical groundwater flooding events near the Application Site and Camden's Flood Risk Management Strategy (FRMS) states that the overall risk of groundwater flooding is low for the Borough. As such, the flooding risk from ground water has also been assessed to be low.
- 12.33 The proposed development has been assessed for its potential to increase flood risk at the Application Site. The risk imposed will not affect the existing flood risk for fluvial and tidal sources in the area therefore the flood risk from this source remains low. In addition the proposed development will not affect the existing flood risk from artificial sources which remains low.
- 12.34 In accordance with Policy 5.13 of the London Plan, the drainage strategy includes the provision of SUDS through the use of underground attenuation tanks and green roofs, impervious roofs, semi-pervious roofs and soft landscaping to mitigate the risk of flooding from surface water runoff. The Application Site will be restricted to 50% of the existing peak surface runoff rate, in accordance with the above Development Plan policies.
- 12.35 The on-site drainage will be managed by a dedicated management company who will be responsible for maintaining all on-site services including drainage; a maintenance regime is included within the drainage strategy. As such, the risk of flooding from surface water is assessed as low post development.
- 12.36 Although foul water production increases post-development, this is compensated for by a greater reduction in the peak surface water rate. With the appropriate drainage measures put in place, the risk of sewer flooding is assessed to remain low. The proposed drainage strategy utilises the existing TWUL combined sewers which run through the Site. The 610 x 457mm sewer, which is believed to serve Gilbeys Yard, will be abandoned and replaced with another sewer run to serve Gilbeys Yard which will be located adjacent to the eastern boundary of the Application Site.
- 12.37 Applying the 50% reduction in peak surface water runoff to the existing rate, the surface water runoff rate will be limited to a maximum of 193.8l/s and 30.8l/s for foul water for the entire Application Site. This approach has been agreed in principle with Thames

Water, and represents a 50% reduction compared to the existing surface water discharge rate from the site.

- 12.38 The Proposed Development includes two basement levels with a finished floor level on the second basement level to be +24m AOD, approximately 9m below existing ground level. The proposed basement will be waterproofed to the appropriate standard specified within BS 8102:2009. As such, the deep groundwater poses no risk to the development.
- 12.39 With regards to groundwater flows, the existing underground car park is broadly similar in scale to that proposed within the redevelopment. As such, shallow groundwater effects including any changes to existing groundwater paths are assessed as negligible and the effect of groundwater flooding remains low.

Conclusions on flood risk

- 12.40 The existing flood risk to the proposed development from surface water was assessed as medium and the flood risk from all other sources was assessed as low. The flood risk post-development has been assessed to reduce to low from all sources.
- 12.41 Overall, the proposals are considered to have no materially harmful impacts on flooding and drainage and the proposals will introduce improvements in the surface water run off rate and introduce a new combined sewer.

Biodiversity and Trees

Development Plan Policy

- 12.42 London Plan Policy 5.10 advocates that developments integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green walls, soft landscaping, and green roofs, as encouraged by Policy 5.11. This is further supported by Policy 7.19 which states that development proposals should, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity. In addition, Policy 7.21 encourages the retention of existing trees of value and the replacement of any felled trees as a result of development and the planting of additional trees.
- 12.43 Local Plan Policy A3 encourages development to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed. Furthermore, the Council require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species, as well as disturbance to trees in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction'. This Policy also incorporates the Councils aspirations to protect, and secure additional trees and vegetation.
- 12.44 Policy A3 refers to the protection of existing trees (including during construction) and the provision of additional trees and vegetation. Trees of significant amenity, historic, cultural or ecological value will be protected and replacement trees should be provided where there is a loss of significant trees. Additional trees are also incorporated

- 12.45 Local Plan policy CC2 requires development to be resilient to climate change including adopting adaptation measures such as green infrastructure which include green spaces and bio-diverse roofs where appropriate.

Material Considerations

- 12.46 Camden's Sustainable Planning Guidance (CPG3) states that all developments should incorporate green and brown roofs unless it is demonstrated that it is not possible or appropriate. This SPG provides further guidance on the types of 'living' roofs the Council expect and what factors they consider in assessing applications, such as the appropriateness for the site and how this will be maintained. Furthermore it requires proposals to demonstrate how biodiversity considerations have been incorporated into the development, what mitigation measures will be included and what positive measures for enhancing biodiversity have been planned. Further details relating to green infrastructure is provided in the Mayoral Sustainable Design and Construction SPG, as well as the All London Green Grid SPG.

Trees

Planning Assessment

- 12.47 An Arboricultural Impact Assessment, prepared by Middlemarch Environmental accompanies this submission. The Council has confirmed that there are no current Tree Preservation Orders within or closely surrounding the study area. However the area towards the north eastern part of the site relating to the PFS parcel sits within the Regent's Canal Conservation Area. As such, notice would need to be served to Camden prior to carrying out work on trees in this area.
- 12.48 The proposed development will require the removal of 48 individual trees within the Application Site and a group of trees located towards the north eastern part of the site. The categorisation of these trees is as set out in Table 12.1 below.

Table 12.1: Tree removal

Category A	Category B	Category C	Category U	Total
High quality and value	Moderate Quality and value	Low quality and value	Unsuitable	
11	14	21	2	48

- 12.49 Given the relative immaturity of the trees present within the site, it is considered that these specimens can be replaced in the short-term. As such, the removal of these trees should not be considered a significant constraint to the proposed development and the wider planning benefits of the proposals need be considered. The accompanying assessment identifies that two of trees identified are within the Regent's Canal Conservation Area and notice will need to be served to the Council before the proposed works.

12.50 There will be a need to mitigate construction impacts on trees to be retained; however, subject to compliance with the below measures, no material impact on trees is anticipated:

- Pruning works to retained trees will minimise the potential for branch damage during construction. All pruning works required are likely to be of a minor extent and of a routine nature and will not have a material impact upon the long-term health or visual quality of the trees;
- Demolition works should be undertaken using a top-down, pull-back methodology, with the building pulled down in a north-westerly direction away from the retained trees;
- Tree protection barriers should be installed during the demolition and construction period. The protective barriers are to be constructed in accordance with the specification detailed in BS5837:2012;
- The removal of existing hardstanding within RPAs to be carried out using the methodology detailed in section 4.3.3 in the supporting Arboricultural Impact Assessment. Given the constraints posed by existing hardstanding on root development, it is not anticipated that significant impact to the health of the trees is likely to occur;
- The proposed development has been designed so that major works are not required within the RPAs of retained trees however protective measures are proposed as set out in the accompanying assessment;
- Construction exclusion zones to be implemented, with protective barriers and ground protection measures where required to provide working space for construction; and
- To minimise harm from the construction of new hard surfaces and buildings around the retained trees, no-dig principles will be implemented as per BS5837:2012.

12.51 To mitigate the tree loss, approximately 180 new trees will be planted including a range of species and sizes to suit various locations within the site. Refer to the landscape strategy within the Design and Access Statement for more information.

12.52 Whilst the removal of 48 trees and one tree group is required, along with pruning works, it is not considered to have a significant impact on the visual amenity of local area as the trees recorded were relatively immature and will be replaced with more numerous replanting. The remaining retained trees will be appropriately protected to avoid any impact. Against this background, we consider the proposals to be in accordance with the objectives set out in Policy A3 and London Plan policy 5.11.

Biodiversity

Planning Assessment

- 12.53 A Preliminary Ecological Assessment, prepared by Middlemarch Environmental accompanies this submission. The desk study confirms that the site is subject to no statutory designations directly affecting the site. Specifically. There are:
- no European statutory sites within 5 km of the survey area;
 - three UK statutory sites within 2 km (namely Belsize Wood, Camley Street Nature Park, and St John's Wood Church Grounds);
 - six non-statutory sites within 1 km (namely London's Canal, Primrose Hill, Chalk Farm Embankment and Adelaide Nature Reserve, Regent's Park, London Zoo and Rochester Terrace Gardens);
 - no statutory site designated for bats within 10 km, and
 - no Sites of Special Scientific Interest (SSSIs) located within a 2 km radius of the survey area,
- 12.54 It is noted that the survey area falls within the SSSI Impact Risk Zone for Hampstead Heath Woods which is located 2.93 km to the north-west however due to the distance and lack of connectivity between the SSSI and the Application Site, the proposed development is not considered to impact upon this nature conservation site.
- 12.55 The desk study and walkover study established that there is no evidence of notable or protected species within the Application Site itself, only species typical of the habitats present were recorded. A range of birds were recorded within the survey area although no evidence of nesting was identified.
- 12.56 Whilst the desk study revealed records of at least six different species of bat within a 1 km radius of the survey area, the nearest records were located 180 m to the north. The buildings on site do not have features suitable for use by roosting bats. In addition, the existing trees are not mature enough to develop features that could be utilised by roosting bats.
- 12.57 Within the surrounding area there was evidence of some notable species, including:
- eight notable plant species within a 1 km radius of the survey area;
 - a number of protected and notable species, and invasive species within a 1km radius of the study area;
 - numerous records of a range of notable invertebrates within a 1 km radius of the survey area; and
 - records of hedgehogs within a 1km radius of the survey area.
- 12.58 The ecological enhancement report recommends the following measures:

- Habitat enhancement is recommended including planting of habitats which would be of value to wildlife such as nectar rich species, the provision of nesting/roosting habitats, and the implementation of good horticultural practice;
- It is recommended that vegetation clearance should be undertaken outside the nesting bird season to limit the potential for impact upon nesting birds;
- The trees and shrubs on site offer some suitable foraging opportunities for bats, albeit limited in extent. The removal of trees as noted above is not considered to have a significant adverse impact on the foraging bats; and
- Accordingly, a number of precautionary measures are recommended and set out in the accompanying Preliminary Ecological Enhancement in accordance with Wildlife Legislation, Local Plan policy A3, London Plan policy 7.19 and CPG 3.

12.59 The Public Realm and Landscape Report prepared by Gillespies provides further details with regards to the ecology and biodiversity measures to be implemented across the Application Site. The landscaping scheme aims to create a series of closed loop systems which has been enhanced by the London Landscape Framework. Furthermore, the proposed planting has been carefully selected to prioritise native and wildlife friendly species best suited to the locality. To complement the vegetation, habitat for invertebrates, birds and bat boxes will be incorporated into the landscape.

12.60 Extensive bio-diverse green roofs are proposed across the Application Site, combined with solar collection PV cells to maximise sustainability benefits of these roof spaces. Varying depths of substrate will be provided for maximum ecological benefit. Extensive brown roofs have also been developed on non-accessible roofs, to provide additional biodiversity.

12.61 Against this background, subject to the outlined mitigation measures being adopted, the proposed development is not considered to have an adverse impact on the ecological value of the Application Site. Moreover, given the extensive planting and landscaping proposed the development will have a positive impact on biodiversity within the site, given the site's very limited biodiversity value at present.

Air Quality

Development Plan Policy

12.62 Since 2000, the whole of the LBC has been designated as an Air Quality Management Area due to high concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). Local Plan policy C1 demonstrates the Council's ambition to improve health and well-being in Camden noting the contribution air quality has on this. This is supported by Policy CC4 which requires developments to take into account their potential impact on air quality and the exposure of prospective occupants of development, by way of an air quality assessment.

12.63 London Plan policy 7.14 requires an Air Quality Neutral Assessment to be undertaken in relation to transport emissions and building emissions. Developments should be at least air quality neutral and minimise exposure to poor air quality.

Material Considerations

- 12.64 Camden has adopted an Air Quality Action Plan which aims to reduce air pollution levels, alongside Camden Planning Guidance (CPG6 Amenity) these documents provide information on how developments should be designed to prevent adverse impacts on air pollution including what mitigation measures can be implemented.
- 12.65 The GLA SPG on Sustainable Design and Construction (2014) also sets out criteria with regards to air quality assessment and designing in relation to air quality. With regards to existing air quality, predicted 2016 concentrations are below the relevant air quality objectives at all existing receptors. Predicted annual mean concentrations of NO₂ and PM₁₀ at the existing receptors are predicted to be below the relevant air quality objectives in 2024.

Planning Assessment

- 12.66 The supporting Air Quality Assessment (and ES chapter) prepared by Ardent provides an assessment of the potential air quality implications of the proposed development. A full technical analysis is included within the assessment report.
- 12.67 The air quality assessment considered:
- demolition and construction activities;
 - transport-related and CHP emissions;
 - the introduction of the new residential population on site, and
 - cumulative impacts.
- 12.68 The AQNA prepared by BBS Environmental refers specifically to building emissions and establishes that no material impacts will occur, due to the sustainability measures incorporated within the design.
- 12.69 The air quality assessment considers the current baseline, based on existing monitoring, to the proposed future baseline, accounting for the proposed development.
- 12.70 Demolition and construction activities may result in dust and exhaust gases; however, subject to appropriate mitigation (following the GLA SPG on the control of dust and emissions during construction), it is considered that these effects can be satisfactorily managed through standard approaches to mitigation, which can be secured through a planning condition.
- 12.71 During operation, the most significant impacts are likely to derive from exhaust emissions, and there may also be an effect from the CHP plant. The air quality assessment finds that there would be a negligible change to air quality as a result of the development and it should be noted that there will be a reduction in supermarket car parking and that the residential scheme will be largely car free. The assessment indicates that a comparison between benchmark conditions and the proposed development effects will meet the requirement for the scheme to be air quality neutral. No mitigation is therefore required and occupants within and nearby the Application Site are not expected to be subjected to adverse air quality conditions.

- 12.72 The proposals are therefore considered to be compliant with the Development Plan and relevant material considerations with regards to air quality.
- 12.73 The CHP unit will be fitted with a catalytic converter to reduce the NO_x emissions to 50 mg/Nm³ and the boilers are fitted with low NO_x burners with emissions of less than 40 mg/kWh.

Contaminated Land

Development Plan Policy

- 12.74 Local Plan policy A1 refers to the need to address contaminated land and policy C1 sets out that the Council promotes health and wellbeing within Camden. Sites that are known to be contaminated such as petrol filling stations to take appropriate remedial action to the Council's satisfaction. This is reflective of London Plan Policy 5.21 which states that "*appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.*"

Material Considerations

- 12.75 Camden's Planning Guidance relating to amenity (CPG6) indicates that developers should identify and assess potentially contaminated land at an early stage. The emerging Local Plan policies reiterate the objectives of the current Development Plan.

Planning Assessment

- 12.76 The Preliminary Risk Assessment produced by Ramboll Environ identifies that the past uses of the Application Site present the potential for contamination, in particular the railways uses of the goods yard area and the PFS use.
- 12.77 The assessment cross references to a Phase II site investigation undertaken in 2010 by Sirius Geotechnical Environmental Ltd. Evidence on contamination was identified and mitigation measures were proposed in relation to a minor development proposal at that time.
- 12.78 The Preliminary Risk Assessment identifies potential presence of contaminants, including asbestos containing materials within existing buildings and made ground; fuels and oils from past uses; as well as general industrial contaminants associated with the parcels' industrial heritage.
- 12.79 However, pathways to future site users would be limited. Proposed buildings and hard standing effectively isolates soil from site users. With regards to landscaped areas, imported topsoil will be used. The only plausible pollutant pathway is considered to be vapours and land gases. This will be further assessed during the normal course of detailed design and ahead of buildings being constructed with appropriate mitigation strategies developed.
- 12.80 It is understood that LBC will address potential contamination through a planning condition requiring a detailed site investigation and subsequent remediation works if necessary.

12.81 Ramboll Environ has stated that the contamination that may be present across the parcels can be dealt with through standard remediation techniques, which may include (where necessary):

- Encapsulation of the soil and groundwater through the building design (i.e. preventing site users being exposed to the existing soil);
- Installation of gas protection within the building design (e.g. gas protection membranes);
- Importation of a layer of clean topsoil in areas of landscaping and proposed private gardens, if provided;
- Decommissioning of the petrol filling station in accordance with best practice and installation of new tanks in accordance with regulatory requirements; and
- Localised soil contamination hotspot removal and or in-situ treatment of soil and groundwater.
- In addition, a piling risk assessment would be undertaken to minimise pollution risks to Controlled Waters and clean soil would be imported in landscaped areas.

12.82 Subject to any necessary mitigation, Ramboll Environ concludes that the two parcels, when developed, would be not considered 'contaminated land' as defined by Part 2A of the Environmental Protection Act 1990. The proposal is therefore considered to be compliant with the Development Plan in this respect.

Wind / Microclimate

Development Plan Policy

12.83 Camden seeks to promote and protect high standards of amenity for occupiers and neighbours when assessing developments as per London Plan Policy 7.6 and Local Plan policy A1. Policy A1 specifically notes the factors that the Council consider when assessing developments and this includes microclimate. As such, large developments are expected to demonstrate how the design has considered local conditions.

Material Considerations

12.84 Camden's Planning Guidance relating to amenity (CPG6) notes that new development should consider the local wind environment, local temperature, overshadowing and glare. CPG6 refers to the Lawson Criteria in assessing the suitability of wind conditions. The emerging Local Plan policies reiterate the objectives of the current Development Plan.

Planning Assessment

12.85 The proposed development underwent extensive wind tunnel testing, to quantify wind levels against widely accepted Lawson comfort criteria. The results of the assessment are set out in the ES chapter 11 (Wind microclimate).

12.86 Wind tunnel tests were carried out in relation to:

- the existing site with existing surrounds (baseline);

- the proposed development with existing surrounds, and
 - the proposed development with cumulative surrounds.
- 12.87 The proposed development, particularly in comparison to the existing limited amount of development and calm wind conditions, will give rise to increased wind microclimatic effects; however, the wind microclimate remains acceptable for walking around the development site.
- 12.88 There would be no adverse effects to the wind microclimate at off-site locations along Juniper's Crescent and Gilbeys Yard, including with regards to amenity spaces and balconies.
- 12.89 Whilst most entrances to the proposed blocks will be comfortable with regards to wind conditions, modelling identified six entrances which were windier than desired, within Blocks A, C and F.
- 12.90 Ground level amenity spaces were generally acceptable; however, some receptors within the amenity space to the north west of the PFS building had some wind effects according to the modelling.
- 12.91 There have been some identified balcony positions that would have standing conditions that would require mitigation in the form of a solid balustrade in place of the railing currently within the design. This could also be achieved with a glazed screen behind the balustrades.
- 12.92 The majority of roof terraces would have the desired sitting wind condition; however, some mitigation would be required in a limited number of cases.
- 12.93 These wind effects will be subject to consideration of the potential for mitigation, during detailed design development. This can be the subject of an appropriately worded planning condition.
- On review of the proposed development's landscaping scheme the majority of wind locations would be addressed. Additional mitigation would be required at 24 locations and these would consist of the following:
 - Shrubs in planters (1.5-2m);
 - Small trees (at least 1.5m);
 - Porous screens/artwork/sculptures (at least 2m)
 - Solid balustrades on balconies; and
 - Recessing of entrances (1.5m recess).
- 12.94 These measures would be tested at the detailed design stage to confirm their effectiveness.

- 12.95 With the cumulative schemes built out, wind conditions in and around the proposed development remain largely consistent (with some areas becoming one category windier and other areas becoming one category calmer) Any windier than desired conditions would be mitigated with the combination of the landscaping scheme and additional mitigation measures set out in the ES chapter.
- 12.96 On the basis of the above and subject to suitable mitigation at the detailed design stage, the proposals are not considered likely to give rise to material harm to amenity as a result of wind microclimate. The proposals are therefore considered to comply with the Development Plan and material considerations in this respect.

Refuse Management / Waste Storage

Development Plan Policy

- 12.97 London Plan Policy 5.17 encourages suitable waste and recycling storage facilities in all new developments. Local Plan policy CC5 concerns itself with waste and recycling stating that the Council will seek to make Camden a low waste borough by ensuring that developments include facilities for the storage and collection of waste and recycling. Developments are required to provide facilities for the storage, recycling and disposal of waste.
- 12.98 CC5 specifies that the Council will increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. LBC seeks to ensure an integrated approach to waste management and encourage the submission of a site waste management plan prior to construction.

Material Considerations

- 12.99 Camden's Design Planning Guidance (CPG1) notes that collection services for developments with 7 or more residential dwellings vary depending on the individual circumstances on the premises.
- 12.100 The Mayoral Housing SPG provides further guidance for these facilities commenting that refuse and recycling stores within buildings should be located to limit the nuisance cause by noise and smells and maintained to a high hygiene standard. Furthermore it refers to the minimum requirements as set out in the British Standard BS5906:2005 Code of Practice for waste management in Buildings.

Planning Assessment

- 12.101 A Waste Storage and Collection Plan prepared by Allies and Morrison accompanies this submission and provides further details. The Transport Assessment and Servicing Management Plan produced by Ardent also consider these arrangements.
- 12.102 Waste management is arranged as follows:
- Managed strategy of waste collection.
 - Dedicated bin store for residents at the base of cores at lower ground floor.
 - Management staff to take full bins to larger store area in car park of Block F.

- Residential refuse collection from The Cuttings.
- Bins also taken by management staff from individual bins of townhouse properties.
- Commercial bin storage at Camden Yard and in Blocks A, B and F, collected by site management team.
- Commercial refuse collection from the layby in front of Block A on The Cuttings.
- Blocks A and F have smaller workspace with individual bins per unit, these will be collected by the management team.
- Supermarket waste will be collected from the store's service yard.

13. Construction management

Construction Management Plan

Development Plan

- 13.1 Local Plan policy T4 states that, where appropriate, Construction Management Plans may be required to be submitted alongside planning applications. These should set out how the movement of goods and materials will be managed and how the impacts of excavation, demolition and construction will be managed.
- 13.2 Local Plan policy A1 also refers to the use of Construction Management Plans to ensure that the impact of development upon neighbouring occupants is appropriately managed.
- 13.3 Policy CC4, with regards to air quality, notes that appropriate mitigation measures (with regards to dust and emissions during construction works) should be addressed with the Construction Management Plan. The GLA SPG *The Control of Dust and Emissions During Construction (2014)* is also relevant in this respect.
- 13.4 Policy A5 notes that CMPs are generally required in relation to basement development.
- 13.5 Final CMP documents will usually be secured via a planning obligation.

Assessment

- 13.6 The scheme is accompanied by a Construction Management Plan, which has been prepared by Barratt London. This document sets proposed construction management arrangements with regards to:

- hours of operation;
- demolition;
- access and parking;
- construction vehicle routing and frequency and site delivery management;
- indicative construction programme;
- materials and plant storage and handling;
- considerations pertaining to pedestrians, cyclists, buses and general traffic;
- contractor accommodation;
- cranes;
- waste and environmental management, including wheel washing and cleaning;
- dust management and mitigation;
- air quality monitoring, and

- public communication.

- 13.7 The submitted CMP is considered to address the requirements of the above planning policies and material considerations. It is anticipated that a final CMP will be required prior to implementation of the planning permission, by condition.

Basement Impact Assessment

Development Plan policy

- 13.8 Local Plan policy A5 and the accompanying supporting text requires that the impacts of basement excavation should be assessed and mitigated, including with regards to drainage, flooding, groundwater conditions and structural stability.

Material considerations

- 13.9 CPG 4 provides further guidance with regards to how LBC assesses the potential impact of basement development and what the contents of a BIA should include. Details of independent verification of BIA reports is also referenced.

Assessment

- 13.10 Aecom has prepared a BIA for the scheme.
- 13.11 The lowest level of the proposed development will be a 4,500sqm basement car park situated in the southern corner of the site. This car park will be at a level of +24.0mOD. Above this will be a 12,500sqm upper basement which will accommodate Morrisons supermarket and associated plant rooms and servicing areas, additional car parking, an energy centre, sports facility and additional retail space. The upper basement will generally be at a level of +28.0mOD.
- 13.12 Over the top of the upper basement will be a landscaped podium from which six main residential apartment blocks will start. A seventh residential block will sit completely outside the line of the proposed basement below.
- 13.13 There are two Thames Water sewers that run across the site. The main trunk sewer runs parallel to Juniper Crescent. The second branch sewer runs roughly parallel to the north east boundary. It is proposed to retain both these sewers and the scheme has been designed to allow these to run under the upper basement/external public space at 28.5mOD.
- 13.14 A Geoenvironmental Appraisal of the site was carried out which consisted of investigation works for a small area of the site. Perched ground water and ground water was encountered. The basement will extend below the perched water table encountered with the made ground but not below the underlying ground water table encountered within London Clay. It is unlikely that dewatering will be needed during construction works. There might be some ingress of water for the lower basement at the start of the works but this should be able to be dealt with by sumps.
- 13.15 The supporting Flood Risk Assessment notes that the existing flood risk of the Application Site from surface water was assessed as medium and the flood risk from all other sources was assessed as low. The flood risk post-development has been assessed to reduce to low from all sources.

- 13.16 In accordance with Policy A5 and CPG4, the proposals were assessed against their potential impact on the adjacent structures including the north east and south west boundaries, the Horse Tunnel Market and Gilbeys Yard. The assessment found that the impact of the proposed basement levels is considered negligible to slight. The area that may be slightly impacted relates to the southern end of the Gilbeys Yard boundary. The perimeter wall is approximately 3m from the proposed basement with the neighbouring apartment blocks a further 11m beyond this however there is a small section that is 6m. The neighbouring apartment block was built in the 1990's with a relatively modern construction which should help to limit the susceptibility to damage via any movement if any. The supporting BIA outlines the proposed construction sequence for the works.
- 13.17 The route of surface water will be changed due to the nature of the development however this will remain being discharged into Thames Water public sewers. All surface water runoff will be captured within the surface water drainage scheme for the site as outlined within the supporting Drainage Strategy. The proposed basements will not change the quality of the surface water being discharged from the site.
- 13.18 Against this background, the proposals have been assessed against the relevant criteria set out in Local Plan policy A5 and guidance set out in CPG4. The potential impacts to the structural stability of neighbouring properties, surface water run-off, existing drainage and the water environment were found to be negligible and at most slight.

Conclusions on basement impact

- 13.19 The submitted BIA demonstrates that the proposed basement will not have a material impact on drainage, flooding, groundwater conditions and structural stability within the site and surrounding area. The proposals are therefore compliant with the Development Plan and relevant material considerations in this respect.
- 13.20 It is noted that the BIA will be reviewed by a third party on behalf of LBC. Pre-submission discussions have already been undertaken to this effect.

14. Community infrastructure and planning obligations

Community Infrastructure Levy

- 14.1 LBC's charging schedule took effect on 1st April 2015.
- 14.2 The site is in 'zone B' as defined in the charging schedule. The charges are as follows:

Table 14.1: LBC CIL charges, zone B

Residential of 10 or more dwellings	£250	
Retail (including bar, restaurant, entertainment and other town centre uses)	£25	
Office	£25	Office is not defined within the charging schedule but we assume this to be B1(a)
Community meeting spaces	£0	
Industry, warehousing, research and development	£0	
Other commercial uses	£25	B1(c) is assumed to be within this category – the charging rate is the same for office in any case.
Mayoral CIL charge	£50	

- 14.3 The Regulation 123 list is the 'Strategic CIL Funding List July 2016'. This sets out details of projects that CIL will fund, including (in summary):

Education

- Additional early years, primary school and secondary school provision to meet identified needs.
- Primary and secondary school improvement works.

Transport

- Provision, improvement, replacement, operation or maintenance of highway infrastructure to accommodate growth (*but excluding site specific accessibility improvements and vehicular crossovers*).
- Borough-wide pedestrian and cycling infrastructure improvements (*excluding site specific works*).

- Specific area-based public realm schemes including Camden Town area scheme.

Sports and leisure infrastructure

- Upgrading of nine specified LBC sports pitches.
- Refurbishment of Talacre Community Sports Centre.
- Sport centre maintenance contracts in relation to specific named facilities.

Health infrastructure

- Specific projects in relation to LBC owned health facilities.

Community infrastructure

- Specific projects in relation to LBC owned community infrastructure.

- 14.4 On the basis of the Regulation 123 list we consider that CIL addresses strategic education and transport infrastructure requirements.
- 14.5 Notwithstanding the above regarding education, the ES socio-economic chapter sets out the primary education has capacity (and future projected capacity) to accommodate the expected child yield. Secondary school provision has current capacity but a projected deficit; however, LBC CIL appears to address this.
- 14.6 With regards to health and community infrastructure the Regulation 123 list sets out that CIL will fund specific identified projects rather than broad strategic requirements. The ES Socioeconomics chapter establishes that there is adequate GP, pharmacy and dental capacity and therefore no additional planning obligation is anticipated with regards to health facilities.
- 14.7 The proposals including the provision of on-site community facilities and therefore it is not anticipated that there would be a need for an addition financial contribution in relation to community facilities.

Planning obligations draft Heads of Terms

- 14.8 Camden Planning Guidance 8 (2015) sets out the council's aspirations for planning obligations (and the relationship to CIL). This document is a Supplementary Planning Document and is therefore a material consideration albeit that the statutory tests will of course apply.
- 14.9 Based on the specific proposals for the site, the contents of SPG 8 and a consideration of both the CIL Regulation 123 list and the statutory tests regarding the use of planning obligations, and further to pre-application engagement with LBC, we consider that the following Heads of Terms are likely to be sought in relation to the development proposals.

Highways s278 Agreement

- Highways reinstatement works
- Level plans/interface details
- Completion of access road to adoption standards

Transport

- Car free housing
- Construction/Demolition Management Plan (CMP)
- Workplace Travel Plan (TP) including monitoring contribution of £tbc and post-occupancy TRAVL survey results to be shared with TfL and Camden
- Residential Travel Plan, including the appointment of a Travel Plan Co-ordinator
- Pedestrian, Cycling, Environmental and Public Realm Improvements contribution £tbc
- Improvement works to Gilbeys Yard cycling route (detailed obligations TBC depending on nature of works and nature of obligation i.e. s278 works or reasonable endeavours)
- Service Management Plan
- Car park management plan – including provision of electric charging points, management of disabled spaces, users, future proofing
- Cycle Hire scheme
- Legible London signage

Housing

- On site affordable housing provision
- Review mechanism (only engaged if agreed progress on site has not been made).
- Provision of wheelchair accessible units and associated parking spaces.

Health & wellbeing / Crime reduction

- Crime prevention strategy, subject to detailed discussion with LBC as to what this comprises.
- NB Ecology and access to nature strategy referred to in LBC draft HoTs is not considered necessary given the extensive landscaping including food growing but could be a planning condition if, on further consideration and discussion, this is considered to meet the condition tests of the NPPG.

Open space

- Landscape and open space/play space provision including future maintenance.
- Reasonable endeavours to integrate landscaping of Network Rail land alongside railway into linear route
- Reasonable endeavours to negotiate with UKPN to improve landscaping of Chalk Farm Road pocket park by moving sub-station

Basement

- Basement Construction plan

Employment/Workspaces

- Provision of Affordable Workspace: costs, ownership, types.
- Marketing strategy for the affordable workspace
- Onsite employment and training initiatives during construction through an Employment and Training Plan or a contribution towards employment and skills opportunities of £TBC.
- Reasonable endeavours to secure a target of 20% local recruitment and comply with Camden Local Procurement Code
- Facilitate at least 1 supplier capacity building workshop/Meet the Buyer event to support Camden SMEs to tender for construction contracts in relation to the development
- Recruitment of construction apprentices through the Council's King's Cross Construction Skills Centre, and work placements.

Sustainability

- Sustainability Plan –to include BREEAM commitments.
- Energy efficiency and renewable energy plan.
- Carbon offset contribution, if required.
- Potential for obligations relating to Decentralised Energy Networks – details TBC.

Site future proofing

- Reasonable endeavours to facilitate access to Winding Vaults
- Reasonable endeavours to provide access to Camden Lock Place
- Provisions pertaining to the temporary and permanent landscaping and parking arrangements of the Chalk Farm Road open space (adjacent to PFS) to ensure implementation of the permanent scheme within an agreed timeframe.
- Reasonable endeavours to provide increased garden space to existing Gilbeys Yard properties (to be returned on redevelopment of Gilbeys Yard)
- Reasonable endeavours to facilitate alterations to access to Gilbeys Yard

Community infrastructure

- Provision of pop up toilet
- Operator of supermarket to allow accessible toilet provision during operational hours

- Provision and maintenance of on-site community facilities
- Public art
- Provision of public lifts

15. Conclusions

- 15.1 The proposals will deliver the planning aspirations for the Application Site, as set out within Development Plan policy and the emerging Planning Framework for the wider Camden Goods Yard area. The proposals represent sustainable development, making best use of a previously developed accessible urban site and planning permission should be granted accordingly.
- 15.2 The re-provision of the Morrisons foodstore as part of the application proposals, and the temporary provision of the foodstore during the construction of the main site, will ensure that Camden Town Centre will be served by an enhanced food retail offer.
- 15.3 Acute housing need is established by the London Plan and LBC's local housing needs assessment. London's population is at its highest ever point and continues to grow. The proposals will provide up to 573 new homes within 60,568 sq m GEA of residential floorspace.
- 15.4 35% of the new homes will be affordable housing, which is a significant proportion and aligns with emerging guidance from the Mayor of London. This will ensure that the new neighbourhood provides housing choice and responds to need within the community.
- 15.5 The proposals will deliver significant new Town Centre commercial uses, comprising flexible A uses, offices and workspace, and including affordable workspace and a community space. The new neighbourhood will have a broad mix of uses ensuring a vibrant and sustainable community.
- 15.6 The form of development takes account of the need to make best use of this important site whilst accommodating constraints and opportunities within the site and surrounding area. The height and position of the new buildings has been influenced by the heritage assets and townscape views and has also been carefully conceived to minimise any potential for residential amenity impacts.
- 15.7 The proposals also take account of the emerging Planning Framework, including LBC's aspirations for redevelopment of neighbouring land at Gilbeys Yard and Juniper Crescent. The proposed masterplan is compatible with the future redevelopment of the wider Framework area.
- 15.8 The proposals will implement the vision for the site as set out within the emerging Framework and indeed the vision set out at the inception of the project by the applicant, which is:

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. The scheme will introduce significant public realm and will create a very open and permeable site, which connects with the wider area, including existing and emerging cycle routes supported by LBC. The hard landscaped yards, landscaping, play space and routes will

be a public benefit and will serve to integrate the development into its surroundings within the wider Camden Goods Yard area and the Town Centre.

- 15.9 The proposals have been developed in conjunction with LBC, through extensive pre-application discussions and in consultation with the local community. The scheme has evolved substantially as a result of this engagement and this has helped to produce a set of proposals which will be wholly appropriate to the Application Site.
- 15.10 Sustainable development can be described as a golden thread that runs through plan-making and decision-taking. The scheme represents sustainable development, as defined by the NPPF, in the following ways:
- Economic – The proposals will directly and indirectly accommodate and generate a significant number of new jobs and will support the local economy.
 - Social – The proposals will realise a new neighbourhood where a substantial new residential and working population will share space with shoppers and those spending time in the new public spaces, many of whom will be neighbours. The design approach will provide health and wellbeing benefits for both new and existing residents. The neighbourhood will replace underdeveloped land which detracts from the Town Centre.
 - Environmental – The proposals will replace a hard-surfaced environment that was built out in an era with different values, with new buildings and spaces built to much higher contemporary standards. Addressing planning policy and other requirements will ensure the site responds to the challenges posed by climate change. The new buildings and landscaping have been designed to be environmentally sustainable in line with current best practice.
- 15.11 The proposed new neighbourhood for this key site within the Camden Goods Yard area will be an exemplary new community with a sustainable mix of uses that will deliver against key planning policy priorities of LBC and which responds to community feedback during pre-application consultation. The proposed scheme is supported by Development Plan policy and relevant material considerations and planning permission should be granted accordingly.
- 15.12 Given the acute housing and economic needs within Camden, there is now more than ever a pressing need for 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.

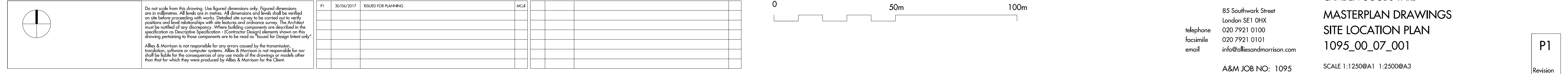
Appendix 1: Planning application submission documents

The planning application submission documents, as agreed with LBC, comprise the following documents:

- Existing and proposed drawings, including site location plan
- Design and Access Statement, including:
 - Safer places statement
 - Access statement
 - Lighting assessment (within landscape section)
 - Public open space plan (within landscape section)
 - Photographs
- Application form
- CIL form
- Planning Statement
- Health Impact Assessment
- Environmental Impact Assessment
- Basement Impact Assessment
- Landscaping statement (within Design and Access Statement)
- Sustainability Statement and Energy Assessment
- Transport Assessment, including:
 - Travel Plan
 - Construction Management Plan
 - Parking arrangement plans
 - Servicing Management Plan
 - Waste and Storage Collection Plan
- Noise and Vibration Impact Assessment including Acoustic Report

- Air Quality Assessment
- Biodiversity Survey and Report
- Tree Survey/Arboricultural Statement
- Archaeological Assessment
- Heritage Statement
- Townscape and Heritage Visual Impact Assessment
- Daylight and sunlight assessment
- Statement of Community Involvement
- Regeneration Statement
- Contaminated Land Assessment
- Affordable Housing Statement
- Draft Planning Obligations Heads of Terms (within Planning Statement)

Appendix 2: Site Plan



A&M JOB NO: 1095

SCALE 1:1250@A1 1:2500@A3

1
sion

Appendix 3: Planning history

Our understanding is that the foodstore and the PFS at the Application Site were constructed under a planning permission granted in 1994 (ref: 9400778). This decision followed a successful planning appeal against non-determination which was granted in 1993 (ref: 9300246) and a parallel planning application granted by LBC in the same year (ref: 9300040), which granted planning permission for a PFS.

Permissions granted in 2002 (ref: PEX0001067), 2009 (ref: 2009/0802/P) and 2010 (ref: 2010/3652/P) approved inter alia alterations and extensions to the approved foodstore.

Planning permission granted in 2005 (ref: 2005/4882/P) approved the 'pod' exit from the Stables Market which can now be found within the foodstore car park.

Table 1 below sets out planning decisions as identified on the Camden Council website.

Table 1: Planning History

Reference	Application Type	Description of Development	Decision	Decision Date
2011/0182/P	Approval of Details	Submission of details for approval of Condition 1 (hard & soft landscaping), Condition 2 (works to be completed before the proposed extension is brought into use) pursuant to planning permission granted on 22/10/2002 (ref: PEX0001067) for the extension of the existing retail store for additional sales and ancillary floorspace (Class A1), including an extension to the existing coffee shop and alterations to the existing busturning area.	Granted	13 January 2011
2010/3652/P	Full Planning Permission	Amendments to planning permission PEX0001067/R1 dated 22nd October 2002 for "extension of the existing retail store for additional sales and ancillary floorspace (Class A1)", to include alterations to the existing bus turning area, the reduction in size of the extension, elevational alterations, new entrance doors and relocation of existing recycling area.	Granted	14 July 2010
2010/1982/P	Full Planning Permission	Amendments to planning permission PEX0001067/R1 dated 22nd October 2002 (for extension of the existing retail store for additional sales and	Withdrawn Decision	Not known

Reference	Application Type	Description of Development	Decision	Decision Date
		ancillary floorspace (Class A1)), including alterations to the proposed south west elevation, fenestration changes to the proposed north west elevation, alterations to the main entrance elevation, and relocation of fire exit doors.		
2010/1964/P	Full Planning Permission	Relocation of ATMS and associated infilling of existing entrance to superstore (Class A1)	Granted	24 June 2010
2009/0802/P	Full Planning Permission	Amendments to planning permission PEX0001067/R1 dated 22nd October 2002 (for extension of the existing retail store for additional sales and ancillary floorspace (Class A1), including an extension to the existing coffee shop and alterations to the existing bus turning area) to reduce size of extension, elevational alterations and further revisions to the existing bus turning area.	Granted	27 August 2009
2005/4882/P	Full Planning Permission	Creation of a new level of retail below ground including the creation of 3 new openings to horse tunnel brickwork and erection of a pod for exit in Morrisons car park at upper ground floor level including reinstatement of the car park (This application is a resubmission and is identical to the previous planning application ref. 2005/2698/P, which was withdrawn as a legal agreement was not completed).	Granted Subject to a Section 106 Legal Agreement	17 February 2006
PEX0001067	Full Planning Permission	Extension of the existing retail store for additional sales and ancillary floorspace (Class A1), including an extension to the existing coffee shop and alterations to the existing bus turning area, as shown on drawing numbers 615/NW1/33/1, 3273-PL-01, 02, 03A, 04N, 691/07B, 08C, 1602/XS/04B, 1602/PP/05B.	Granted	22 October 2002

Reference	Application Type	Description of Development	Decision	Decision Date
9401804	Full Planning inc Councils Own	Amendments to planning permission dated 10.01.94 (Reg No. 9301122) for redevelopment for housing in respect of a reduction of total parking provision by seven spaces as shown on drawing nos. 92/442-PL112 and SK205C.	Granted Full or Outline Perm. With Condit.	11 May 1995
9400778	Full Planning inc Councils Own	Amendment to condition 08 of the planning permission dated 31 August 1993 for the development of the site for a food superstore to allow an increase in the maximum permissible net sales area for 30,000 sqft to 30,500 sqft as shown on drawing no(s) 2274/SK34 and 2274/L01.C.	Grant Full or Outline Planning Permission	05 August 1994
9400060	Councils Own Approval of Details	Approval of details of hard and soft landscaping and the proposal lightly scheme pursuant to conditions 1 and 2 of the outline planning permission dated 31st August 1993 (Reg: PL/9300040) including the use of grey and charcoal Greenham Alpha concrete setts as indicated. as shown on drawing numbers 92/442/SK501 SK502 and unnumbered booklets containing lightly details and landscaping details.	Granted Appr. Of Details/Res.Matters (Plan)	21 April 1995
9301284	Full Planning inc Councils Own	Approval of matters relating to design external appearance; the layout of roads footpaths cycle routes and car parking areas; fencing and other means of enclosure to the sites; and the preservation and restoration of the canal towpath wall and railings within the site as shown on drawing nos. PL/101A 102B 103B 104A 105A 107A 108A HEF/01-08 10-15 16A HES/01-06 08-10 HER/01-03 13 SK104 109 202 204 206A 305-316 318 HP/01-06 07A 08 09 10A 11-18 and materials:- artificial slate Birchwood Yellow London stocks Anglian Smooth Buff Cambrian Smooth Blue Engineering bricks reconstituted stone softwood for	Granted Full or Outline Perm. With Condit.	09 January 1994

Reference	Application Type	Description of Development	Decision	Decision Date
		painting steel balconies render & glazed bricks in panels (pursuant to conditions 12 11 12 15 of the permission dated 31.08.93 (Reg. No. 9300040) as revised 13.12.93).		
9301122	Full Planning inc Council's Own	Approval of matters relating to design external appearance; the layout of roads footpaths cycle routes and car parking areas; fencing and other means of enclosure to the sites; and the preservation and restoration of the canal towpath wall and railings within the site as shown on drawing nos. PL/101A 102B 103B 104A 105A 107A 108A HEF/01-08 10-15 16A HES/01-06 08-10 HER/01-03 13 SK104 109 202 204 206A 305-316 318 HP/01-06 07A 08 09 10A 11-18 and materials:- artificial slate Birchwood Yellow London stocks Anglian Smooth Buff Cambrian Smooth Blue Engineering bricks reconstituted stone softwood for painting steel balconies render & glazed bricks in panels (pursuant to conditions 12 11 12 15 of the permission dated 31.08.93 (Reg. No. 9300040) as revised 13.12.93).	Granted Full or Outline Perm. With Condit.	06 January 1994
9300246	Outline Planning inc Council's Own	Outline application for 30 000 sq.ft. of food superstore 533 space car park petrol filling station and servicing and accessing from Chalkfarm Road and Oval Road. (Site Plan only)	Appeal Decided	1993
9300040	Outline Planning Permission	The redevelopment of land at Camden Goods Yard to provide a retail store with a gross floorspace of 58,000 sqft (30,000 sqft net) associated surface car parking for staff and customers a petrol filling station and a total of 197 residential units consisting of 28 four-bedroom houses 49 three-bedroom houses 70 two-bedroom units and 50 one-bedroom flats together with 135 car parking spaces as shown on	Granted	31 August 1993

Reference	Application Type	Description of Development	Decision	Decision Date
		drawing nos. 92/442/P01 2274/P/1 and 92/442/SK4a and 5 for illustrative purposes revised on 26.02.93		
9200046	Full Planning inc. Councils Own	Temporary use of the land for a maximum of 30 car parking spaces until 31.03.93. *(Plans submitted)	Withdrawn after Reg'n (not used PACIS)	08 May 2003
9110021	Councils Own Approval of Details	Submission of details pursuant to condition 01 of the planning permission dated 10.05.91 (Reg No. 9003598) for the construction of dual access onto Chalk Farm Road with associated works including the construction of retaining walls and the installation of traffic signaling equipment and facilities for pedestrians. *(Plans submitted)	Grant Appr. Of Details/Res.Matters (Plan)	10 December 1991
9100025	Full Planning inc Councils Own	Construction of dual access onto Chalk Farm Road with associated works including the construction of retaining walls and the installation of traffic signaling equipment and facilities for pedestrians as shown on drawing nos. 163444/S2A 5205/1B 2C 83056/100B 102D 104B 105B 106B 107A 108B 109C 7277/CS/107 7277B/CS/100/E 83056/115. revised on 06.03.91.	Grant Full or Outline Perm. With Condit.	11 March 1991
9003551	Councils Own Approval of Details	Submission of details pursuant to Conditions 1 and 6 of the appeal decision granted by the Secretary of State on 01.11.90 for refurbishment of building except for proposed mansard roof for B1 use together with associated car parking and servicing. *(Plans submitted) Appeal received against the Council's failure to issue their decision within the appropriate period.	Grant Appr. Of Details/Res.Matters (Plan)	15 August 1991
9003460	Outline Planning inc	Renewal of the outline planning permission given on appeal by the Secretary of State on 27.11.87 for	Withdrawn after Reg'n (not used on PACIS)	08 May 2003

Reference	Application Type	Description of Development	Decision	Decision Date
	Council's Own	redevelopment of the site by erection of buildings to provide non-food retail industrial & residential together with the retention and refurbishment of the Interchange Warehouse to provide restaurants discos wine bar coffee bar and shops formation of means of access to Chalk Farm Road. *(Site plan only)		
9003461	Approval of Reserved Matters	Submission of details pursuant to the outline permission granted by the Secretary of State on 27.11.87 for redevelopment of site by erection of buildings to provide non-food retail industrial & residential together with the retention and refurbishment of the interchange warehouse to provide restaurant discos wine bar coffee bar and shops and formation of means of access to Chalk Farm Road. *(Plans submitted)	Withdrawn after Reg'n (not used on PACIS)	08 May 2003
9070409	Conservation Area Consent	Applications - To demolish within a (Conservation Area) 1. 9070409 - Demolition of 92.5m of part of the wall on Chalk Farm Road to create a new access for vehicles and pedestrians. Duplicate application Reg No. 9070410. 2. 9070411 - Demolition of 113m of part of the wall on Chalk Farm Road to create a new access for vehicles and pedestrians. Duplicate application Reg. No. 9070412. 3. 9070413 - Demolition of 50m of part of the wall on Chalk Farm Road to create a new access for vehicles and pedestrians. Duplicate application Reg. No. 9070414 *(Plans submitted)	Withdrawn after Reg'n (not used on PACIS)	08 May 2003
9003100 & 9003101	Outline Planning inc Council's Own	Redevelopment of the Camden Goods Yard site for housing office and industrial use together with associated works servicing car parking and landscaping as shown on drawing no. TPMP01. Appeal received against	Refuse Full or Outline Permission (10 April 1990) / Appeal Decided	10 April 1990

Reference	Application Type	Description of Development	Decision	Decision Date
		the Council's failure to issue their decision within the appropriate period.		
9003102 & 9003103	Outline Planning inc Council's Own	Outline permission to develop the site at Camden Goods Yard for offices industry (B1c) retail (A1 A2 and A3) leisure and housing together with associated roadworks servicing and landscaping including the refurbishment of 30 Oval Road as shown on drawing nos 9151 TP/A01 A02 to A010; 9151 TP/BO1 to BO5; 9141 TP/CDO1 to CDO5; 9151 TP/EO1 to EO4; 9151 TP/FO1 to FO3; 9151 TP/GO1 to GO4; 9151 TP/FO1 to FO7; 9151 TP/HO1 to HO4; 9151 TP/JO1 to JO3; 9151 TP/MPO1 to MPO6; 7277B/CF/10; 7277/TP 504C; 9151/TP CAO1 and 7277/TP MPO1. Appeal received against the Council's failure to issue their decision within the appropriate period.	Refuse Full or Outline Permission (10 April 1990) / Appeal Decided	10 April 1990
90003029	Outline Planning inc Council's Own	Renewal of outline permission granted on 16th January 1987 for the redevelopment of land to the east of the Roundhouse on Chalk Farm Road (known as the Simclan site for office and light industrial uses as shown on drawing nos 2444/SK1/OW SK2/OW SK3/OW and a location plan submitted at that time.	Refuse Full or Outline Permission (10 April 1990)	10 April 1990
9003005 & 9003006	Outline Planning inc. Council's Own	Outline permission to develop the site at Camden Goods Yard for offices industry (B1c) retail (A1 A2 and A3) leisure and housing together with associated roadworks servicing and landscaping including the refurbishment of 30 Oval Road as shown on drawing numbers 9151 TP01 and TP02.	Appeal Decided	Not known
8903511	Outline Planning inc	Redevelopment of the Camden Goods Yard site for housing office and industrial use together with	Appeal Decided	Not known

Reference	Application Type	Description of Development	Decision	Decision Date
	Council's Own	associated road works servicing car parking and landscaping as shown on drawing nos TP100A-108A 109 110A-112A 201-221 230-240 301A 302A 303-304 401-409 500-502 2051 2061 and TPMP01.		
8602146	Outline Planning inc Council's Own	Outline application for the redevelopment of the site to provide 4 acres of Council housing (approx. 120 dwellings) and 10 acres of industry and the use of the Interchange Warehouse for studio workshops residential and leisure/museum uses; 30 Oval Road to be retained for existing studio and workshop uses *(plans submitted).	Grant Full or Outline Perm. With Condit.	18 December 1986
8500890 & 8500891	OH – Data Takeon	Outline application for the redevelopment of the site by the erection of buildings to provide non-food retail industrial and residential accommodation together with the retention and refurbishment of the Interchange Warehouse to provide restaurants discos wine bar coffee bar and shops and the formation of a new means of access to Chalk Farm Road as shown on 1-unnumbered site plan and as revised on 15th October 1985. Appeal received against refusal of permission	Appeal Decided (Granted PX/X5210/A/86/050795)	Not known

Appendix 4: Pre-application feedback



TfL Ref: 16/4753

Andrew Braun
abraun@ardent-ce.co.uk

8th June 2017

Transport for London
Group Planning

Windsor House
42 – 50 Victoria Street
London SW1H 0TL

Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk

Dear Andrew,

Camden Goods Yard, Camden: follow-up TfL Pre Application Meeting

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.

A previous TfL Pre Application meeting for this site took place on 9th December 2016 and a letter summarising TfL advice from that meeting was issued to the applicant on 21st December 2016. This letter supplements the previous advice given by TfL rather than repeating or replacing it.

To discuss a number of outstanding strategic transport issues and scheme changes, a follow-up Pre Application meeting was advised by TfL and LB Camden as being potentially useful. We are pleased that you accepted this advice.

A site visit was also made by new TfL case officer Gavin McLaughlin on 11th April 2017 having been fully appraised of the previous discussions and the particulars of the proposals. The follow-up meeting was held from 10.30am to 12.30pm on 24th May 2017, and attended by, most of whom were at the previous meeting:

Gavin McLaughlin	TfL Borough Planning (Case Officer)
George Snape	TfL Borough Planning
Michal Miklasz	TfL Borough Planning/ Outcomes Delivery Modelling Liaison
Paul Murphy	TfL Bus Operations
Paul Lawley	TfL Bus Network Development
James Hammond	LB Camden Transport team
Raymond Cheng	LB Camden Transport team
Acacia Hasler	LB Camden Transport team
Gavin Sexton	LB Camden Planning (Case Officer)
Andrew Braun	Ardent
Simon Hall	Ardent
Chris Groves	Barratt London
Ian Fergusson	Turley
Attaz Rashid	Barratt London

This letter aims to summarise the discussion and provide a record of points discussed, with any action points highlighted and further explanation given where it may be beneficial.

Prior to the follow-up meeting, TfL considered the following additional information submitted on behalf of the developer:

- Email from Ardent to TfL Borough Planning of 18th May 2017 and attached:
 - Chalk Farm Base Model_v3.0 ACE Edit - ACE Scheme no CFR cycle lane (SK39B)
 - Chalk Farm Base Model_v3.0 ACE Edit - ACE Scheme no CFR cycle lane (SK39B)_MM
 - Chalk Farm Base Model_v3.0 ACE Edit - ACE Scheme no CFR cycle lane (SK48)
 - Clock diagram showing Bus service patterns at current Morrison's store during the AM peak hour [filename 'FIGURE 4']
 - Office trip rates [from TRICS database]
 - Resi Trip Rates [from TRICS database]
 - SK39B Chalk Farm Rd Signal Junction-Option 1 [drawing]
 - SK41 Roundabout Access & Bus Stops [drawing]
 - SK48 Chalk Farm Rd Signal Junction-Option 4 [drawing]

Please also find attached a *Planning Application Local Modelling Overview* by Michal Miklasz, with detailed technical advice on modelling for the proposed scheme, in particular a new junction onto Chalk Farm Road.

Development Proposal

The latest development proposals differ from those included in the original Scoping Note, and have been outlined to TfL as follows:

- Replacement foodstore with similar gross floor area (circa 7000sqm), served by 310 car parking spaces over two basement levels (inc. 14 Blue Badge bays)
- 555 Residential Flats, which will be car-free except for 20 Blue Badge spaces
- 7408sqm workspace/retail/offices (car-free)
- Whilst the new store is being developed, the current Petrol Filling Station (PFS) site will be used as a temporary store of c. xyz m2 floorspace with 61 parking spaces and offices above (car-free). This will then be converted back to the PFS (retaining offices) once the new permanent store is complete. The proposals include the temporary development of this store/offices as well as its conversion back to a PFS/offices with x car parking spaces/car free for the PFS

TfL seeks clarification as to whether 'circa 2000sq m of office space', referred to at section 3.10 of the original Scoping note as to be provided on floors above the petrol filling station, is in addition to or part of the 7408 sq m total provision of workspace/retail/offices quoted more recently. All quantum by land use in the development proposal should be clarified in the final application TA.

Local cycling & walking conditions

The cycling network in this part of London is poor and underused in places. It therefore needs improvement, as noted in:

- Camden Transport Strategy 2011 (see 5.1.44 on poor cycle permeability in the borough's town centres)
- TfL International Cycling Infrastructure Best Practice Study (December 2014)
- TfL Analysis of Cycling Potential 2016 policy analysis report (March 2017)
- Camden Goods Yard SPD (draft) by LB Camden (published for consultation March 2017)

TfL also recently published Healthy Streets for London (February 2017), and Healthy Streets is expected to be a major set of objectives in the forthcoming London Plan and new Mayor's Transport Strategy (MTS), both due for publication later this year. Improving the health of Londoners through transport planning and urban design is now a key priority for the Mayor and TfL.

This includes being able to enjoy clean air and an environment that feels safe, relaxed, easy to move through and not too noisy. Developers, local planning authorities and other relevant stakeholders should prioritise active travel and look to balance user needs, creating inclusive environments that can be accessed and enjoyed by all, especially by bike or on foot.

Local transport improvement projects

Camden Town London Underground (LU) station upgrade

The number of people using Camden Town station is increasing; demand has risen by 45% over the last ten years. At peak times, congestion means it takes longer to enter, leave and change between trains. As a result TfL is currently consulting on construction of a new entrance on Buck Street, as well as three new escalators and two lifts for passengers and an over station development of new homes and commercial space. This project is currently expected to be completed by 2024 subject to the necessary consents and funding.

Chalk Farm & Primrose Hill

LB Camden is developing an area-based scheme to improve transport and the public realm in Chalk Farm and Primrose Hill, with the following objectives:

- simplified and safer junctions
- improved cycling links
- safer pedestrian crossing points
- better streets that reduce traffic congestion, delays and collisions
- improved air quality
- safe, attractive and less cluttered streets
- increased cycle parking
- a better place to live and do business

This project covers the application site and Chalk Farm Road. It is funded from Council budgets and is currently at design stage; LB Camden has engaged the engineers Jacobs who have produced proposals, inter alia, for a new highway arrangement at the junction between Chalk Farm Road and Juniper Crescent, serving the Camden Goods Yard site.

TfL supports the Council's objectives and our Outcomes Delivery Modelling team has begun working with Jacobs to ensure the new highway proposals can work within London's traffic signals network, which is maintained and managed by TfL. This work is at a relatively early stage as the designs so far produced are not detailed designs and have not yet been subject to strategic modelling. TfL understands the Council hopes to carry out a public consultation on the junction proposal later during the 2017/18 financial year.

However the applicant for this development proposal has put forward an alternative proposal for the Juniper Crescent/Chalk Farm Road junction. Their proposal simplifies it to two-way working and removes the slip road behind the petrol station at the temporary store stage. The access associated with the slip road around the back of the current petrol station is retained in the applicant's proposed highway arrangement for the permanent store and development, but as a servicing egress only, for tankers exiting after delivering fuel.

The applicant contends the part of the application site currently covered by the slip road is required by Morrison's for a temporary food store during construction of the development, and that without removal of the slip road the development proposal will be unable to proceed. TfL's view on this matter is discussed in the next section on 'Site access' and in the attached traffic modelling note.

Site access

Juniper Crescent/Chalk Farm Road junction

Please see the attached Modelling Note for comments on this aspect of the current development proposal, which includes a request to carry out a Road Safety Audit (RSA) of the current design options, and for the modelling data inputs to include all additional traffic which would be generated in the future temporary and permanent development flow scenarios, including cycling and construction traffic.

It should also be noted here that, as discussed at the meeting, Camden Council have consistently and clearly insisted that the junction should have a dedicated cycle signalling phase with a low wait time, and fully segregated cycle phases and lanes through the junction. At present TfL and Camden Council share concern that there could be conflict between car traffic and cyclists turning left off Ferdinand Street opposite Juniper Crescent, the main access to the development.

In order to avoid TfL objections to the application on these grounds prior to determination and Stage 2 of the GLA referral process we will need to feel reasonably confident that a safe and pleasant solution, balancing the needs of road users appropriately in accordance with London Plan policy, can be achieved at the Juniper Crescent/Chalk Farm Road junction to support the new development. However the detailed design can be reserved for agreement between TfL, the applicant and Camden Council prior to commencement of demolition for the development, as part of a S278 agreement.

Cycling

TfL may raise a strategic transport objection through the GLA planning application referral process on cycling safety grounds, depending on the findings of the requested RSA.

At the meeting, the Camden planning case officer Gavin Sexton raised the issue of potential conflict between cyclists and vehicles on Juniper Crescent further into the development, which is being discussed in detail at further landscaping meetings between the applicant and Council.

To inform these discussions TfL would encourage the applicant's design team to consult the London Cycling Design Standards (LCDS) to inform such discussions and designs, in particular Chapters 3 (Cycle-friendly streets & spaces) and 4 (Cycle lanes), both available from:

- <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>

Servicing

HGV and where relevant petrol tanker movements during all development phases including construction of the temporary store, the operational phase of the temporary store during demolition and redevelopment of the main site, and post-occupation must be clearly outlined in the TA with swept path analysis for a range of vehicle types and sizes rather than just the largest. Different vehicle types have different turning circles and thus the largest may not necessarily be the worse case scenario. The servicing access arrangement at every stage of the development should also be taken into consideration as part of the above mentioned RSA.

Walking

The recently published draft Camden Goods Yard SPD identifies and emphasises specific issues with the current walking and cycling environment at the application site:

- No sight lines [from Chalk Farm Road] through to what lies beyond, discouraging footfall and creating an unwelcoming environment for pedestrians and cyclists, that feels unsafe (p. 40)
- To accommodate a significant uplift in density and remove the isolation of the site, additional pedestrian and cycle links must be created linking to a network of legible routes that prioritise pedestrians and cyclists, and create a safe, pleasant and legible environment innovatively addressing level changes. (p. 41)

TfL supports these observations and requirements of the Council. It was discussed at the meeting that the Council would prefer all footway to be removed on the west side of Juniper Crescent under the rail bridge, to encourage pedestrians to use a footway on the other east side, which the Council have requested should be at least 5m wide. Creation of a raised table and shared space traffic arrangement stretching all the way from Chalk Farm Road to the new Morrison's was also discussed.

Although receptive to this suggestion, the applicant contends the bridge is already very low and the bridge structure, carriageway and footway under it are actually a solid reinforced concrete box semi-buried underground, which Network Rail have advised cannot be altered for operational reasons.

As the Council is the highway authority for the relevant roads, TfL has no further formal comment on the pedestrian access arrangement discussions to date. However important information on bus carriageway width and height clearance requirements was discussed at the meeting and is included at the start of the next section, for the applicant's design team.

Buses

As discussed at the meeting, the minimum carriageway width for buses is 3.25m per lane, (which assumes that overtaking of cyclists is only possible by crossing the median white lines) and the minimum height clearance is 4.88m. For further information on bus stop and route design requirements, please consult the TfL Streetscape Guidance, also available from:

- <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>

The bus stopping and standing arrangement currently proposed by the applicant is satisfactory to TfL Bus Operations, as it would provide a good passenger experience with pick up/drop off at the main frontage of the new Morrison's store, and could accommodate two 27 and two 393 buses at any given time, with additional standing space for overspill use adjacent to the mini-roundabout on Juniper Crescent.

The application TA should demonstrate how rail replacement bus standing (currently on the slip road) will be reprovided in situ or elsewhere or can work using the new bus access arrangement. We will also need to discuss arrangements for all buses during the temporary store/construction phase.

TfL Planning will be happy to share further information on the exact operational needs of the rail replacement service in terms of standing duration, service pattern frequency, and how often it usually runs each year.

For all bus stopping and standing areas on site, TfL will seek appropriate property rights to ensure unhindered operational access 24 hours per day, 365 days per year, secured by appropriate legal agreements and/or planning obligations. TfL therefore seeks clarification as to the proposed highway adoption status of Juniper Crescent post-completion.

TfL Bus Operations also requests access to bus driver toilet facilities at the site, and appropriate management arrangements and access rights. TfL will be happy to discuss these matters further with the Council and applicant prior to determination.

London Underground (LU)

LU colleagues have expressed concern about any potential increase in people using Camden Town station, as it currently suffers from crowding and congestion with operational controls being enforced on a regular basis. This issue is particularly severe at weekends due to the large influx of visitors to Camden.

As a result the application must include a proper assessment of LU demand split by line/direction/ticket hall, and consider its impact on both station (e.g. gateline, escalator) and train capacity, as well as the public realm, including footways, in the vicinity of both Camden Town and Chalk Farm stations. We will then need to consider any necessary mitigation to be secured through the S106.

Taxis

Although it was not discussed at the meeting, facilities should be provided for taxi pick up/drop off at the new development, especially adjacent to the new Morrison's supermarket.

Pick up/drop off bays provided should also be accessible to pre-booked Private Hire Vehicles (PHV) and for general pick up/drop off, especially of disabled people. TfL would welcome further discussion on this matter with the applicant and Council and expects to see adequate appropriately located pick up/drop off provision for the different users in the application proposals with justification as to the capacity and general arrangements in the TA.

Car parking

The development would be car-free except for 310 replacement car parking spaces, including 14 for Blue Badge holders, for the store and 20 such spaces serving the residential element of the scheme. Whilst we would have preferred less car parking in the context of the existing 425 spaces and the overall development proposals the 310 spaces is accepted by TfL.

61 car parking spaces are proposed for the temporary store on the site of the petrol filling station, which exceeds London Plan standards of 1 space per 30 sq m for food stores up to 2500sqm. Policy compliant provision would be 48 spaces or less. However given the unique circumstances, overall reduction in car parking at the development post-completion, the continued provision for buses and active travel during this phase and the obvious need to continue serving an existing food shopping customer base, on balance this is acceptable to TfL. TfL reminds the applicant that the temporary store will also need Blue Badge parking and pick up/drop off areas.

TfL supports the car-free approach to the residential and non-supermarket commercial uses in the proposed development, in accordance with London Plan policies 6.11 (Smoothing traffic flow and tackling congestion), 6.12 (Road network capacity) and 6.13 (Parking).

Paragraph 6.44 of the London Plan endorses a local approach to deciding what is adequate parking for disabled people, and new London Plan policies on Blue Badge parking are currently evolving as part of the new MTS and London Plan.

At this stage in the development of new policy on this matter, all planning applications and local authorities should take into consideration current London Plan policy and guidance, notably:

- Development should have one on or off street blue badge parking space and, where general off-street parking is provided, at least two Blue Badge spaces are required and BS 8300:2009 should be taken into account when deciding any further provision (with local circumstances also still a consideration) (London Plan para 6A.2)

Cycle parking and cyclist facilities

End-of-trip facilities, showers and lockers should be provided for staff at all commercial uses (in accordance with London Plan para 6A.13). TfL will seek for these to be secured by condition.

The London Plan also advises that for both long-stay and short-stay cycle parking, consideration should be given to providing spaces accessible to less conventional bicycle types, such as tricycles, cargo bicycles and bicycles with trailers (para 6A.13), the larger spaces already proposed are welcome.

TfL recommends a 5% allocation for larger cycles and that the top of any 2-tier racks have some form of mechanical assistance to help less able cyclists. TfL also reminds the applicant and Council of the following additional cycle parking specifications at paragraph 6A.13 of the London Plan:

- Short-stay cycle parking should be available for shoppers, customers, messengers and other visitors to a site, and should be convenient and readily accessible. Short-stay cycle parking should have step-free access and be located within 15 metres of the main site entrance, where possible.

A London Plan compliant amount of short-stay cycle parking must be provided in the public realm around the Site. TfL will seek for this to be secured by condition. Appropriate provision should also be made for the temporary phase of development, and for construction workers.

Trip generation and mode split

A Transport Assessment (TA) should be included in the application submission. It should follow TfL Transport Assessment Best Practice Guidance, available at:

- <http://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>
- <http://www.tfl.gov.uk/cdn/static/cms/documents/example-high-level-transport-assessment-structure.pdf>

In particular, TfL reminds the applicant:

- Where sites are currently in use as here, TfL would expect to see surveys to ascertain current levels of trip generation rather than relying on data from alternative sources such as the trip generation database TRICS
- When using TRICS, sites more than five years old must be excluded unless otherwise agreed with TfL. The sites used should have comparable characteristics including use, scale, PTAL and car parking. The criteria used in selecting sites should be clearly stated and agreed by TfL in advance of the TA submission

The application TA must provide a detailed assessment of the impact of the development on London Underground (LU) and bus services and infrastructure. The current TA Scoping Note adopts acceptable mode splits based on those accepted by TfL and the Council for the neighbouring Stables Market development.

Due to the popularity of Camden as a destination for weekend shoppers and tourist visitors, the popularity of supermarkets at weekends, and known issues of pedestrian crowding at Camden Town station and on local footways, TfL requests that all trip generation provided also assesses weekend peak hours of 12 noon -2pm on both Saturday and Sunday.

TfL also seeks clarification as to why a person trip rate for the 2000 new employees at the proposed development has been used for the office trip generation rather than a per sq m trip rate based on appropriate comparison sites from the TRICS database.

TfL will use the trip generation and mode split assessment to consider whether a financial and/or other appropriate obligation is warranted to address the impacts of the development on any TfL assets, services and infrastructure, or for appropriate, proportionate and relevant public transport and active travel promotion measures.

LU trips generated by new development in the area may have an adverse impact on local services and Camden Town and Chalk Farm stations. It will therefore be essential for the application TA to include proper assessment of the new demand likely to be generated by development proposals, to enable LU to forecast and analyse impacts on ticket halls, gatelines, escalators/lifts, and train capacity and identify any necessary mitigation.

These assessments should split estimated demand by direction and identify common new journey destinations and origins on the Northern Line. They must also split new LU trips robustly and realistically between Chalk Farm and Camden Town, taking into account the availability, accessibility and quality of local walking routes at each phase/site in the SPD area as well as the capacity and nature of each station.

Due to busy bus corridors within vicinity of the development, the application TA should include trip generation figures split by bus route and direction for both AM and PM weekday peaks, and the 12noon-2pm Saturday and Sunday peaks requested for LU.

Cycling

The previous TfL Pre Application letter referred to inclusion of a Cycling Environment Review System (CERS) in the application TA. However an alternative assessment is now preferred by TfL, as explained in Chapter 2 of the London Cycling Design Standards (LCDS, 2014, available from <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>)

As a rule of thumb, the extent of a local area analysis should take in approximately 10 minutes' cycle from the site boundary, (i.e. 2 km at a cycling speed of 12kmph). TfL Planning has appended a supplementary advice note by TfL Cycling, 'Assessment of cycle infrastructure for planning applications', to this preapplication advice letter.

Cycle Hire

There are 2 Cycle Hire docking stations within walking distance of the Site:

- Arlington Road
- Castlehaven Road

The nearest, Castlehaven Road, is in the top 10% - 25% of all Docking Stations in London for number of hires. The local area has therefore been identified as a hotspot area for Cycle Hire redistribution and there is a strategic focus on increasing docking points via S106 funding.

This development will further stress our Cycle Hire network operationally. As a result, with the support of LB Camden, TfL Planning will seek a S106 contribution of £220k and land adjacent to the new creative workspace for a new Cycle Hire docking station. TfL will also seek appropriate property rights to ensure unhindered operational access to the docking station 24 hours per day, 365 days per year, secured by appropriate legal agreements and/or planning obligations.

At the meeting the applicant's team enquired as to the possibility of contributing a commuted sum to Cycle Hire infrastructure or installing groups of new docking points

in phases with demand monitoring triggers written into the S106 agreement, which would not be acceptable to TfL.

Please consult the attached Cycle Hire Developer Guidance for information on the land and accessibility required for a new docking station at the development.

Legible London

TfL will seek a S106 contribution for Legible London wayfinding signage (payable to Camden), to support pedestrian routes around the development, and updates to existing plinths nearby, including those adjacent to Cycle Hire docking stations.

Construction

TfL understands from discussions at the meeting that the developer is currently working to the following rough timetable:

- Commencement (spring 2018)
- Temporary store construction (18 months)
- Rest of development construction (at least 2 further years)
- Completion (in 4-5 years)

A neighbouring site on Juniper Crescent is designated to become a worksite for HS2, potentially during construction of this proposed development. As a result TfL would welcome further detail on construction traffic and routes in due course, as it becomes clear to the applicant's team from ongoing liaison with HS2 Ltd.

Stables Market development nearby

The nearby Stables Market site secured a planning consent from Camden Council (2012/4628/P) in 2012 for a mixed use development comprising 8 new buildings between 3 and 9 storeys in height and containing employment, housing, retail market, cinema, produce market, and a new primary school.

TfL is seeking financial support from both LB Camden and Market Tech, the new owners and developers of the Stables Market site, to help fund public realm improvements immediately adjacent to the new entrance of Camden Town LU station.

Improvements to the station exit/entrance and adjacent public realm will directly benefit the new development's owners, occupants and visitors. However when consent was granted, the station upgrade project was not confirmed within the TfL Business Plan, so a Section 106 or CIL contribution to public realm improvements could not be formally secured.

TfL wishes to encourage the Council to themselves lead and co-ordinate delivery of this public realm improvement project alongside other investments and interventions such as the Chalk Farm & Primrose Hill project, and provide CIL funding. Camden Town station capacity upgrade have highlighted this opportunity within the Camden Council Working Group meeting, led by Bethany Cullen and David Joyce and TfL would welcome further discussion with the Council on this matter.

Furthermore, should the application TA for this development proposal indicate that a large number of new trips will be generated at Camden Town station, TfL may seek an appropriate and proportionate S106 for the station upgrade works.

S106 Contributions, Community Infrastructure Levy (CIL) and Supplementary Planning Guidance (SPG)

Within this letter, a number of elements have been identified for inclusion in the 'heads of terms' of the S106 agreement. Once the TA has been further advanced and has assessed the likely impacts of the proposals on the transport network, detailed mitigation measures can then be further discussed and subsequently agreed with TfL and LB Camden.

In accordance with London Plan policy 8.3 the Mayor commenced CIL charging for developments on 1st April 2012. Within the borough, the charge is £50 per square metre.

TfL will expect a clear statement, in the form of 'Heads of Terms', showing all the transport-related contributions and obligations that the development is expected to provide in the S106 agreement or by way of the S278, to be included in the application material.

If you have any queries, have further questions or seek clarification please contact the case office Gavin McLaughlin using gavinmclaughlin@tfl.gov.uk or 07711345112

Yours sincerely



Lucinda Turner
Acting Director of Borough Planning,
Email: Lucindaturner@tfl.gov.uk
Direct line: 020 3054 7133

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

Ian Fergusson
Turley
The Charlotte Building
17 Gresse Street
London
W1T 1QL

Our ref: D&P/4158
Date: 25 January 2017

Dear Ian

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

Site: Camden Goods Yard
LB: Camden
Our reference: D&P/4158

Further to the pre-planning application meeting held on 13 December 2016, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



Colin Wilson
Senior Manager – Development & Projects

cc Lucinda Turner, TfL

25 January 2017

Camden Goods Yard

in the London Borough of Camden

The proposal

Mixed-use redevelopment of the existing Morrisons food store and petrol filling station site in Camden Town Centre to deliver a new mixed use neighborhood including; new homes; business floorspace; replacement food store; replacement filling station; car parking; replacement bus stop; and other associated works, including highways works. The scheme presented at the meeting comprised approximately 611 residential units, 16,250 sq.m. B1 floorspace including affordable workspace, plus a replacement Morrisons food store and petrol filling station.

The applicant

The applicant is **Safeway Stores Ltd and BDW Trading Ltd**, and the architect is **Allies & Morrison**.

Context

1 On 21 November 2016 a request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 13 December 2016 a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- Jonathan Finch – Senior Strategic Planner (case officer), GLA
- Colin Wilson – Senior Manager Planning, GLA
- Tristan Gielen, TfL

Local Planning Authority

- Gavin Sexton, LB Camden
- Kevin Fisher, LB Camden

Applicant

- Attzaz Rashid, Barratt London
- Georgina French, Morrisons
- Hendrik Heyns, Allies and Morrison
- Kirsty Leslie, Allies and Morrison
- David Cawston or Laura Patrizi, Piercy & Co

- Tilo Guenther or Gillian Brady, Niall McLaughlin
- Ian Fergusson, Turley

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application. Please note that the advice you receive is dependent upon the quality of the information and documentation that you provide.

Site description

3 The application site comprises three parcels of land situated to the rear of the Stables Market within Camden Town Centre and is made up of the double height Chalk Farm Morrisons food store and car park (main site), the associated petrol filling station fronting Chalk Farm Road (PFS site) and a small area of access road below a railway bridge. The combined site area amounts to approximately 3.2 hectares and also includes areas currently used by buses for layovers. The main site is bounded by the West Coast mainline railway line to the south west and the Northern overland line to the north east, the Stables Market beyond the Northern overland line and social housing to the south at Gibleys Yard and to the north at Juniper Crescent. The PFS site is bound by Chalk Farm road to the north, railways lines to the south and the access road the east and west.

4 The main site is elevated by approximately six metres above Chalk Farm Road and has limited access other than the main vehicular access from Juniper Crescent and a level pedestrian access from Oval Road/Gibleys Yard to the south east. To the north-east corner there is a pedestrian access point via lift and stairs to the Stable Market, although it is understood that the applicant only has rights to the top 0.4 metres of land in this area and the covenants stipulate that it can only be used for parking or landscaping. Due to the level changes, limited access and situation between railways lines, the site is considered relatively isolated from the wider town centre.

5 There are no listed buildings within the application boundary; however, the site is adjacent to a number of conservation areas. The Regents Canal Conservation Area effectively wraps the northern, eastern and southern boundaries of the main site and incorporates the PFS site. There are a number of listed buildings within this conservation area in close proximity to the site, namely the Roundhouse, the Stables Market, the Interchange Warehouse and Gibleys Warehouse. The Primrose Hill Conservation Area lies to the south-west beyond the West Coast mainline railway and beyond Chalk Farm Road to the north is the Harmwood Street Conservation Area and to the north-west is the Eton Conservation Area. The viewing corridor of protected London Panorama 2A.2 from Parliament Hill summit to the Palace of Westminster also traverses approximately half of the application site, where the London View Management Framework indicates that building heights should not exceed approximately 84 metres AOD.

6 With regards to policy designations the application site is located with a major town centre. It is noted that whilst the food store was previously identified for redevelopment in Council's 2006 UDP, this has not been carried forward and the site is not allocated in the current local development plan or emerging planning policy. Notwithstanding the above, the Council updated its Camden Town Place Plan in December 2013 which sets a series of objectives and priorities to help maintain the town centre's success. The core objectives seek to support creative industries and resident's access to employment; manage the impacts of the night time economy; enhance transport capacity and public realm; diversify and improve the retail and leisure offer; and to promote development whilst retaining and enhancing the special character of the heritage area.

Details of this proposal

7 The proposals seek the redevelopment of the application site to deliver a mixed-use development including new homes, business floorspace, a replacement food store and petrol station, car parking, replacement bus stop and other associated works including highways works. The scheme presented at the meeting compromised approximately 611 residential units, 16,250 sq.m. B1 floorspace including affordable workspace, plus a replacement Morrisons food store and petrol filling station. The applicant is also currently exploring the viability impacts of potentially including of a new sports facility and a small-scale hotel within the mix of uses.

8 It is understood that during the construction of the replacement food store, the proposed building on the PFS site will accommodate a small scale temporary store to provide enable continued access to convenience goods and trading.

Strategic planning issues and relevant policies and guidance

9 The relevant strategic issues and corresponding policies are as follows:

- | | |
|----------------------------|--|
| • Principle of development | <i>London Plan; Town Centres SPG</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy; emerging draft Affordable Housing and Viability SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings/views | <i>London Plan, London View Management Framework SPG</i> |
| • Historic Environment | <i>London Plan; World Heritage Sites SPG; Circular 07/09</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy</i> |

10 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Camden Core Strategy (2010); the Camden Development Policies (2010); and The London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

11 The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance, in addition to the draft Camden Local Plan (2105) are also relevant material considerations.

Summary of meeting discussion

12 Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to the principle of development, housing and

affordable housing, urban design and transport. GLA officer advice in respect of these issues is set out within the sections that follow, in addition to detailed written comments regarding inclusive design and sustainable development.

Principle of development

Town centre development

13 As set out above, the application site is within Camden Town Centre which is classified in table A2.1 of the London Plan as a Major Town Centre. London Plan Policy 2.15 seeks to coordinate the development of London's network of town centres so they provide the main foci beyond the Central Activities Zone for commercial development and intensification, including residential development; sustain and improve a competitive choice of goods and services conveniently accessible to all Londoners, and provide a sense of place and local identity within the capital. With regards to planning decisions, strategic policy sets out that development proposals in town centres should be in scale with the centre (London Plan Policy 4.7) and sustain and enhance its vitality and viability; accommodate economic and/or housing growth through intensification; support and enhance the competitiveness, quality and diversity of town centre services including retail, leisure and employment; promote access to public transport, walking and cycling; promote lifetime neighbourhoods, enhance the environment through urban greening, public realm improvements and links to green infrastructure and reduce delivery, servicing and road user conflict.

14 The proposals seek to intensify the currently underutilised site to deliver a replacement food store of comparable size and petrol filling station, a significant number of new homes and new employment floorspace including affordable workspace, in addition to a potential new sports facility and small scale hotel use in a highly accessible location. Furthermore, as set out in further detail in the design section, the proposals will deliver a number of public realm improvements through addressing the existing change in levels and partially removing the existing retaining wall along Juniper Crescent, better integrating the site into the existing urban structure, although further consideration of the design of the public spaces is required. Therefore, the proposed mix of uses are appropriate to the major town centre location and broadly reflect the strategic aspirations of London Plan Policies 2.15 and 4.7 and are strongly supported.

Commercial floorspace

15 The proposed food store will replace the existing operational store and it is understood that this will be at a comparable size, although marginally reduced, whilst enabling the employment and residential intensification of the site. This is an appropriate use in a town centre and does not raise any strategic policy issues. In addition to the food store, the proposals also include approximately 680 sq.m. of additional retail floorspace spread across the site in smaller units aimed at meeting the needs of the new residential community. This is supported and will also help activate new public routes through the site and provide an active frontage onto Chalk Farm Road.

16 The mixed-use development also proposes approximately 15,880 sq.m. of B1 commercial/work space, including affordable workspace. The applicant has calculated that this quantum of floorspace could generate between 1,500-1,700 new jobs which is strongly welcomed. As set out, the applicant is proposing that a proportion of the floorspace will be provided to an affordable workspace operator which is strongly welcomed in accordance with the Mayor's strategic priorities. At the meeting it was suggested that this may comprise 611 sq.m. of workspace around the proposed Makers Square located at the main entrance to the site. Further detailed information on the management arrangements and the level of discount proposed should be provided to support this offer.

17 It is understood that any future planning application will be supported by an economic impact assessment which is welcomed.

Hotel and sports facilities

18 The applicant is also exploring the provision of a small-scale hotel use within the upper levels of the proposed building on the PFS site and a new sports facility on the main site.

19 With regards to the proposed hotel use, London Plan Policy 4.5 seeks to support London's visitor economy by achieving 40,000 net additional hotel bedrooms by 2036, of which at least 10% should be wheelchair accessible and beyond the Central Activities Zone (CAZ), and guides this provision towards town centres where there is good access to public transport. Therefore, the principle of providing a hotel within the proposed mix of uses would be supported by strategic planning policy.

20 Following discussions at the meeting, it is understood that there is an identified need for a new sports facility in the London Borough of Camden which could be met on this site and London Plan Policy 3.19 supports development proposals that increase or enhance the provision of sports and recreation facilities. In this respect the applicant is strongly encouraged to fully explore the opportunity to deliver a new sports facility as part of the proposed mix of uses as this will help meet both local and strategic policy objectives. As discussed at the meeting, the opportunity to provide such a facility on the north-eastern parcel of land on the main site should be explored as this may help reduce the potential impact on viability, however, GLA officers acknowledge that there are potential issues with regards to covenants restricting the use of this land. Other alternative options to provide this facility not within a basement should also be considered.

Housing

21 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum ten year target of 8,892 homes in the Plan period 2015-2025. The current scheme proposes a total of 611 residential units and it is understood that the applicant is currently discussing the potential residential mix with the Council to ensure it responds positively to local housing need.

Affordable housing

22 At the strategic level, London Plan Policy 3.11 seeks to maximise affordable housing provision in London. At the local level, Camden Council Policy DP3 seeks the maximum reasonable amount of affordable housing to be delivered on sites with a capacity of ten or more units on the basis of a 50% target of the total additional housing floorspace and delivered via a 60:40 tenure split (affordable/social rent:intermediate). The proposals will deliver a proportion of affordable housing onsite; however, the applicant is currently testing the viability impacts of providing a sports facility and affordable workspace before it can provide further information on the quantum to be delivered.

23 As discussed at the meeting and as set out within the Homes for Londoners: Draft Affordable Housing and Viability SPG, November 2016, the Mayor intends to establish a benchmark level of 35% affordable housing (with a policy compliant tenure split, see paragraphs 28 below, and 2.27 to 2.31 of the draft SPG) as a cut off for the requirement for a scheme viability review process, i.e. where a scheme proposes 35% affordable housing, a viability report need not be prepared and submitted.

24 Nevertheless, if an offer of less than 35% is made, the applicant will be required to submit a viability appraisal in support of the proposed scheme. This should be rigorously tested by the Council and its independent consultants, with all key appraisal inputs scrutinised, including: benchmark land value; developer profit margin (relative to scheme risk); build costs; assumptions regarding rental levels and, sales values. Both the submitted appraisal, and the findings of the independent review, would need to be shared with the GLA. The applicant is strongly encouraged to meet the 35% benchmark in order to simplify the planning process, and help deliver the Mayor's manifesto commitments. Furthermore, the applicant should confirm the costs attributed to the sports facility and the impact this has on affordable housing delivery.

25 With regards to affordable housing tenure, London Plan Policy 3.11 establishes a strategic target of 60:40 social/affordable rented: intermediate housing, but provides the flexibility for local planning authorities to set their own targets for social/affordable rent and intermediate housing in local plans. In this case, the Council's preferred tenure split reflects the strategic target. The Mayor is keen to maintain the flexibility afforded in current adopted policy to meet local needs while ensuring the delivery of his preferred affordable products. On this basis, the draft SPG seeks the following preferred tenure split:

- at least 30% low cost rent (social rent or affordable rent) with rent set at levels that the LPA considers 'genuinely affordable' (this will generally be significantly less than 80% market rent);
- at least 30% as intermediate products, with London Living Rent (*see definition within paragraphs 2.32 - 2.35 of the draft SPG*) and/or shared ownership being the default tenures assumed in this category;
- the remaining 40% to be determined by the relevant LPA (when setting a mix, LPAs should take account of the values generated by different types of affordable tenures and implications on delivering the 35% threshold).

26 In developing the affordable housing component of the scheme, the applicant is strongly encouraged to refer to Part 2 of the draft SPG and have particular regard to paragraphs 2.27 to 2.31 when testing tenure splits. When presenting the offer the applicant should provide information on the proposed rent levels and affordability thresholds where appropriate, in addition to identifying the affordable units and provide habitable room calculations.

Housing choice

27 London Plan Policy 3.8, together with the Mayor's Housing SPG seeks to promote housing choice and seeks a balanced mix of unit sizes in new developments, with particular focus on affordable family homes, which is also reflected in the Council's priorities in the emerging Local Plan. With regards to the overall housing mix, the development would be expected to demonstrate how it responds to local housing needs, and this should be established in consultation with the Council's housing team.

Residential standards

28 London Plan Policy 3.5 establishes the strategic priority afforded to the quality and design of housing developments, with further guidance provided in the Mayor's Housing SPG. Key factors such as floor-to-ceiling heights, orientation, maximising ground-floor individual access points, and number of units per core, are all essential to achieving high residential quality, and are of particular importance when assessing residential quality. It is noted that some of the residential floors have more than eight units sharing a core which exceeds the recommendation in Housing SPG Standard 12, but on average over the entire scheme this standard is met. In conjunction with the design comments set out below, the applicant is encouraged to reconsider the residential layouts in order

to achieve no more than eight units per core across the entire scheme where possible and to promote the highest standards of residential quality.

29 The applicant has set out that the residential units will be designed to address London Plan minimum space standards. Furthermore, 90% of the units will be accessible and adaptable dwellings meeting Building Regulation requirement M4 (2) and the remaining 10% will be wheelchair accessible/easily adaptable meeting Building Regulation M4 (3). This is supported. All units should achieve a minimum of 2.5 metres floor to ceilings heights to further enhance residential quality.

30 As part of any future planning application, the applicant should provide a detailed housing schedule which demonstrates full compliance with the Mayor's space standards including residential amenity, in addition to a detailed assessment of the units against the baseline and good practice standards within the Mayor's Housing SPG.

Children's play space

31 It is recognised in the submission documents that this aspect of the scheme is not yet fully developed and was not therefore discussed in detail at the meeting. As part of the application submission, a detailed play strategy would be expected, demonstrating how the scheme will meet the play space requirements set out in London Plan Policy 3.6 and the Mayor's revised supplementary planning guidance 'Shaping Neighbourhoods: Children And Young People's Play And Informal Recreation'. The applicant should ensure that sufficient space is provided in accordance with the expected child population of the completed development. Door-stop play provision is expected on-site for the under-five's as a minimum (10 sq.m. per child), and following a review of existing facilities in the immediate area, it may be necessary to also provide on-site play for older children, and/or provide a financial contribution to the provision, or improvement, of off-site play facilities.

Residential density

32 Given the characteristics of the site, the public transport accessibility level (PTAL) of between 6b, and its central location, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest a residential density of between 650 to 1,100 habitable rooms per hectare (hr/ha) for this development. The applicant has calculated a residential density of 912 hr/ha for the main site which falls comfortably within the suggested ranges in the London Plan. The applicant should provide updated density calculations for the scheme once the mix of uses of finalised.

Urban design

33 With the exception of the existing petrol filling station, the majority of the application site is set back from Chalk Farm Road and provides little contribution to the existing townscape environment and the significant level change from Chalk Farm Road to the western reaches of the site results in a substantial blank retaining wall that runs the extent of Juniper Crescent and has a detrimental impact on the pedestrian experience along this route. The continuation of this retaining wall on the existing petrol filling station building also provides a significant amount of dead frontage onto Chalk Farm Road. The redevelopment of this site therefore represents an opportunity to make a significant improvement to urban environment in this part of Camden Town Centre.

34 The provision of a new building on the PFS site with active retail uses at ground floor fronting onto Chalk Farm Road will help animate the public realm on the approach to the

application site and the Stables Market whilst providing a better defined high street frontage. With regards to the main site, the proposals seek to address the existing urban condition created by the level changes by removing the large retaining wall after the railway bridge to provide an at grade entrance to the mixed-use development via a new public square fronted by the main entrance to the replacement food store (Morrisons Square) which connects to pedestrian routes through the wider application site towards Oval Road (Makers Square), helping improve permeability through the site. The new square will also be visible from Chalk Farm Road which will help improve legibility in the area and help connect the new proposals (and application site) back into the urban grain. These key aspects of the proposals are welcomed.

35 As set out at the meeting, the applicant is encouraged to give further consideration to the current layout of the residential blocks and their relationships to the new public spaces created within the site. In particular, while the constraints presented by the routing of the existing sewer is acknowledged, Block C creates an awkward relationship with the open space surrounding it and further consideration should be given to the location and shape of this block to provide better defined, high quality public spaces.

36 Furthermore, the applicant is encouraged to reconsider the overall approach to landscaping and public realm with a view to providing spaces that the new residents can take 'ownership' of, such as community gardening or allotment space. Providing such spaces will help contribute towards the social and community value of the proposed new 'mixed-use neighbourhood' and the overall quality of life offered to new residents. This would also help address those concerns raised at the meeting with regards to increasing urban greening and providing a softer, greener public realm within the development.

37 With regards to height, scale and massing, the proposals include a range of building heights from three to seventeen storeys in height with the taller elements demarking the proposed new pedestrian routes through the site and the massing generally stepping down to the east to respond to the existing housing at Gibleys Yard.

38 Recognising the requirement to optimise the development potential of this well connected town centre site to help meet London's strategic housing need and based on the level of detail presented thus far, while it is acknowledged that the development is clearly visible in those longer views from around the site and from within the adjacent conservation areas, the applicant has considered this at length and as a result the proposed massing is considered to have a minimal impact on the surrounding townscape and forms an appropriate response to this site.

39 However, given the location of the site within the setting of a number of conservation areas and listed buildings and within the viewing corridor of the protected London Panorama from Parliament Hill summit to the Palace of Westminster from Parliament Hill the overall massing should be supported by a detailed townscape and heritage visual impact analysis and this assessment should be provided as part of any future planning application. As set out at the meeting, GLA officers welcome further follow-up pre-application meetings as the design progresses in order to address the above comments.

Inclusive access

40 London Plan Policy 7.2 seeks to ensure that future development meets the highest standards of accessibility and inclusion, and requires that design and access statements explain how the principles of inclusive design, including the specific needs of disabled people, have been addressed. This is particularly important given the significant level changes across the site.

Public realm

41 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people and this should be given detailed consideration as the design is developed. The need for steps and level changes should be designed out wherever possible, however if unavoidable, a sloped approach should be provided in addition to the steps. It is noted that lifts are provided adjacent to steps in two locations lifts; this approach is not ideal as access relies on a mechanical device which could break down. However, if unavoidable the lifts should be of a suitable size and type (larger than minimum and full passenger lifts not platform lifts) to ensure that they will be as usable as possible for as many people as possible, and their use should not be limited e.g. they should be as easy to access as the stepped option.

42 External sloped level changes should be shallower than 1:20 and incorporate a level landing per 500mm of level change. External steps should be designed in accordance with the latest design guidance BS8300:2009 + A1:2010. They should incorporate handrails, contrast nosings, the correct level landings and correctly positioned hazard warning tactile paving and should not taper i.e. should have consistent risers and goings throughout the width of the flight. Seating should be provided within the public realm and it should incorporate suitable backrests and armrests to ensure that it is as usable as possible.

43 Any areas of shared space proposed should be designed with the Accessible London SPG guidance in mind to ensure that these areas are inclusive.

Retail

44 The applicant should reconsider the retail parking arrangements as it may be possible to locate more of the disabled parking bays closer to the retail entrance, which would also minimise the vehicle circulation routes users of these bays need to navigate. The provision of two lifts in addition to steps and traveller options from the car parking level up to the retail level is strongly welcomed as is the fact that they are all in close vicinity to one another. It is noted that toilets are proposed within the retail element and the applicant should consider providing a 'Changing Places' toilet (further guidance is available in the Accessible London SPG).

Residential

45 Standard 18 of the Housing SPG requires one designated disabled persons parking bay per M4(3) property. If the M4(3) dwellings are to be 'wheelchair adaptable' instead of 'wheelchair accessible' from the outset (wheelchair accessible can only be required under planning if the end user is known), it may be acceptable for some of the disabled persons parking bays to also be 'adaptable' i.e. created if a disabled resident moves in and requires one. If the applicants wish to take such an approach, this should be justified in a car park management strategy and submitted for consideration. The applicant should also show how the residents' sports facilities will be accessible.

46 If the applicant would like to present the proposals to the GLA's Strategic Access Panel to get disabled people's input into the scheme, GLA officers can facilitate this. Further information on the panel and their annual report can be found on the Planning Working Groups section of the GLA website.

Energy

Sustainable development

47 While not discussed in detail at the meeting, the following comments should be addressed as the scheme develops. Updated energy assessment planning guidance is available on the GLA website (March 2016). This provides further information on the revised targets to take into account Part L 2013 of the Building Regulations. It also provides details on the information that should be included within the energy statement to be submitted at the application stage. The Mayor will apply the zero carbon (as defined in section 5.2 of the Housing SPG) for residential development and 35% below Part L 2013 for commercial/non-domestic development for planning applications after the 1st October 2016.

48 The carbon emission figures should be reported against a Part L 2013 baseline. The above-mentioned guidance provides details on presenting carbon emission information separately for domestic and non-domestic elements of the development in light of the zero carbon target coming into force for domestic development.

49 The applicant should commit to meeting Part L 2013 by efficiency measures alone and sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

50 Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with Policy 5.9. The applicant should particularly consider how best to mitigate any restrictions posed by, for example, local air quality or noise issues, ground floor apartments and single aspect units. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended and an area weighted average for the actual and notion cooling demand should be provided. A domestic overheating checklist is included in the GLA's energy guidance which should be completed and used to identify potential overheating risk and passive responses early in the design process. The completed checklist should be included in the appendix of the energy statement.

51 The applicant should investigate opportunities for connection to nearby district heating networks and the applicant should liaise with the Council's energy officer to investigate potential opportunities for connection. The site should be served by a single energy centre and site wide heat network that is suitable for connection to wider district networks now or in the future. All uses on the site should be connected to the network and a drawing/schematic demonstrating these connections should be provided. Where a site wide heating network is not deemed to be feasible the rationale for this should be provided.

52 A plan showing the size and proposed location of the energy centre should be provided and the applicant should follow the energy hierarchy when considering the potential for CHP and renewable energy technologies. In line with Policy 5.7 the applicant should investigate the inclusion of on-site renewable energy generation.

Flooding

53 The site is located in Flood Zone 1 and therefore a flood risk assessment (FRA) will be required as part of any future planning application. Environment Agency mapping reveals that some parts of the site, including large parts of the PFS site, are at high risk of surface water flooding. Parts of the wider catchment are also at high risk of surface water flooding, including the adjacent Juniper Crescent near the railway line. Given this potential risk sustainable urban drainage measures such as the provision of green roofs; permeable paving; landscaping that

maximises attenuation and Design for Exceedance measures should be explored in order to accord with London Plan Policy 5.13. Particular consideration should be given to direct discharge of treated surface water into Regent's Canal given its proximity to the eastern boundary of the site.

Transport

54 The applicant has engaged in pre-application discussions directly with Transport for London (TfL) and detailed comments have been provided. A summary of the key issues is provided below.

55 There is an existing bus stand and turn around area directly adjacent to the food store which serves the 393 and 27 bus routes. There is also an existing bus stand on the PFS site, which is primarily used for curtailment of services. The applicant proposes to relocate the bus facility to Juniper Crescent and concerns are raised as to how this proposed new arrangement will operate and detailed plans have not yet been submitted to TfL to demonstrate this. As set out at the meeting, a concept design should be submitted to TfL for comment, accompanied by a swept path analysis and road safety audit, prior to the submission of a planning application.

56 The proposal will have off street servicing which is supported subject to the provision of a delivery and servicing plan and the provision of safe access for cyclists, pedestrians and buses. Given the excellent public transport accessibility of the site, the car free nature of the residential component is supported, subject to policy complaint blue badge parking and the exemption of residents from applying for local parking permits. However, TfL considers the level of parking proposed for the food store excessive and seeks that the developer considers a reduction. Policy complaint cycle parking should also form part of their submission.

57 A PERS and CERS audit should be undertaken and form part of the transport assessment with a view to identifying any localised improvements to the local pedestrian and cycling environment. Docking stations in the area are experiencing high demand and TfL considers that a section 106 contribution of £220,000 for a 32 dock cycle hire station is justified. The transport assessment will be expected to include a detailed assessment of the impact of the development on bus services. Due to the anticipated trip generation from this development, TfL may consider that bus service capacity enhancements are required to mitigate the impact of this development.

Conclusion

58 The principle of the proposed residential and employment intensification of the site, including the re-provision of the existing food store and petrol filling station and the potential provision of a new local sports facility that will also help improve permeability and legibility in the area is supported. Notwithstanding this, in line with comments provided within this report further work on the overall building layout and the public space design is required and GLA officers welcome further meetings to discuss the design further as it progresses.

59 In addition to the above, further discussion is required as the affordable housing component of the scheme is developed and a number of issues specifically relating to housing mix, inclusive design, sustainable development and transport are raised which should be addressed as part of any future planning application submission.

for further information contact GLA Planning Unit, Development & Projects Team:

Colin Wilson, Senior Manager – Planning Decisions

020 7983 4271 email colin.wilson@london.gov.uk

Jonathan Finch, Case Officer

020 7983 4799 email jonathna.finch@london.gov.uk

Mr Roger Mascal
3774
Turley
Associates

Direct Dial: 020 7973

The Charlotte Building
PA00451686
17 Gresse
Street

Our ref:

London

W1T 1QL
2017

14 March

Dear Mr Mascal

Request for Pre-application Advice

CAMDEN GOODSYARD, NW1

Thank you for contacting us on 8 March 2017 regarding your proposals for the above site. The presentation was useful for assessing the impacts of the proposals. The purpose of this letter is to provide you with Historic England's formal pre-application advice, assuming that the submitted proposals will be based on the proposals presented on 8 March.

Advice

Significance

The significance of this part of Camden is principally derived by a combination of Victorian railway and canal infrastructure, and earlier planned residential neighbourhoods. The proposal site is not within a conservation area, but it is surrounded by or near several conservation areas (Regent's Canal CA; Primrose Hill CA; Harwood Street CA), and is close to several listed buildings, the most significant of which is the grade II* listed Roundhouse to the north.

Proposals

The proposals are for the complete redevelopment of the existing Morrison's supermarket and adjoining car park, both of which detract from the built environment of the area and are specifically excluded from the Regent's Canal Conservation Area. The proposals are for a new master plan creating new public spaces and connections to existing streets beyond, and for the construction of a range of mixed-use buildings for retail, commercial and creative workspaces and residential use. The tallest of these is proposed for 14 stories. The principal material for the buildings is brick to reflect the industrial context of the area.

Policy Context

Both Section 16 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and their settings.

Section 72 of the same Act sets out the statutory duty on local planning authorities to pay special regard to preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out those duties is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where conserving heritage in a manner appropriate to their significance is one of the 12 core principles.

NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter (paragraph 7) including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

Section 12 of the NPPF sets out how the historic environment should be conserved and enhanced and makes it clear at paragraph 132 that when considering the impact of a proposed development on a heritage asset (which includes its setting), 'great weight' should be given to preserving its significance. Harm to significance should be exceptional and any harm or loss should require clear and convincing justification.

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 134 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

If the harm is substantial, or results in a total loss of significance, paragraph 133 states that local authorities should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or all of four criteria apply:

- The nature of the heritage asset prevents all reasonable uses of the site; and
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- The harm or loss is outweighed by the benefit of bringing the site back into use.

Position

We welcome the redevelopment of the site, which currently detracts from this part of Camden Town. We believe there is much scope for urban enhancement here, and we broadly support the master plan, its mix of uses and the general design approach. The proposed height of the tallest elements of the proposals will, however, have impacts that go beyond the immediate development area. These includes impacts on parts of Primrose Hill Conservation Area through the introduction of larger scale development visible in some views where the immediate context is one of traditionally scaled historic buildings; on the grade I registered Regent's Park where the development would be visible above the tree line; and on the setting of the grade II* listed Roundhouse in some views from Haverstock Hill where the prominence of the Roundhouse would be diminished by the larger new development in the backdrop.

In our view, however, the harm identified above is modest and could be outweighed by public benefits in accordance with Paragraph 134 of the NPPF. In that regard, we urge you to liaise with Camden Council in order to ensure that the harm is mitigated as far as possible and clearly outweighed by public benefits.

Recommendation

When we are consulted formally on a submitted application, we will advise Camden to weigh the harm against the public benefits and determine the application as they see fit.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Dunn', is written over a background of faint, repeating text 'electronic electronic electronic'.

Michael Dunn

Principal Inspector of Historic Buildings and Areas

E-mail: michael.dunn@HistoricEngland.org.uk

CAMDEN GOODSYARD, NW1

Request for Pre-application Advice

List of information on which the above advice is based

8 March presentation and associated documents



Historic England



20 December 2016

Andrew Braun
Email: abraun@ardent-ce.co.uk

Transport for London
Group Planning

Windsor House
42 – 50 Victoria Street
London SW1H 0TL

Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk

Dear Andrew

Camden Goods Yard, Camden, - Pre Application Meeting with TfL on 9th December 2016

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.

Firstly, I would like to take this opportunity to thank you for taking advantage of the TfL pre-application service, the aim of which is to ensure that development is successful in transport terms and in accordance with relevant London Plan policies. I hope you found the meeting useful. This letter aims to summarise the discussion and provide a record of points discussed, with any action points highlighted and further elaboration given where it may be beneficial.

By way of summary, the proposal is to re develop the site to comprise circa 12,000 sqm of commercial floor space (retail/leisure/commercial) and between 600 and 750 residential units. The commercial floor space will comprise a replacement foodstore (Morrisons) equating to 6,982 sqm which is a minor reduction compared to the current store. There is a replacement petrol station proposed on the Chalk Farm Road frontage of the development.

The pre-application meeting was held on 9th December and was attended by:

Tristan Gielen	TfL Borough Planning (Case Officer)
Elena Rys	TfL Cycle Hire
George Snape	TfL Borough Planning
Darren Canty	TfL Buses
Paul Lawley	TfL Buses
Graham Stump	TfL Buses
James Hammond	Camden Borough Council
Andrew Braun	Ardent
Simon Hall	Ardent
Chris Groves	Barratt London
Georgina French	Morrisons

Ian Fergusson	Turley
Attaz Rashid	Barratt London
Ulrich Van Eck	Barratt London
Marco Colaiacomo	Allies and Morrison
Tom Bradley	Allies and Morrison

A site visit was made by Tristan Gielen and George Snape on 8 December 2016.

TfL considered the following documents as part of its review:

- Camden Goods Yard, Chalk Farm Road, Camden, Transport Assessment Scoping Report for Barratt London dated October 2016

Site context

The site is split into two and is partitioned by a railway line. The southern block is the largest portion of the site and comprises the Morrisons foodstore, with associated car park, and is bordered by Juniper Crescent and the London Overground railway line, owned by Network Rail (NR) but operated by TfL. The Northern portion of the site comprises the existing Morrisons petrol station and is bordered by Chalk Farm Road as well as the London Overground line. London Underground infrastructure (Northern Line) lies beneath Chalk Farm Road.

Juniper Crescent is a private access road whilst Chalk Farm Road forms part of the local road network. The nearest part of the Strategic Road Network (SRN) is Kentish Town Road approximately 1km away and the nearest part of the Transport for London Road Network (TLRN) is approximately 0.6 km away (Camden High Street). Vehicle access to the development site is currently from Chalk Farm Road and Juniper Crescent.

There is an existing bus stand and turn around area on the site directly adjacent to the Morrisons store which serves 2 bus routes (393 and 27). There is also an existing bus stand on the Morrisons petrol station site, which is primarily used for curtailment of services. All these bus facilities, at least at their current capacity, will need to be retained in the new design, although an appropriate relocation within the site to be agreed with London Buses and at the developers cost may be possible.

There are 5 additional bus routes which stop nearby on Chalk Farm Road and Maiden Road. Camden Town (London Underground), Chalk Farm (London Underground) and Kentish Town West (London Overground) are within walking distance of the site. There is an entrance/exit to a stairwell which links the site to Camden Market and an existing pedestrian route which connects the site to Gilbeys Yard which is used as a more direct route between Camden Town Station to the existing Morrisons. Measured on a scale of 1a – 6b where 6b is the highest, the site has a PTAL of 6b, which is considered excellent.

The nearest cycle route is Cycle Superhighway 11 which is approximately 0.5 km from the site at Regent's Park and is currently under construction. The nearest cycle hire docking stations are located along Castlehaven Road (19 docking points) and Arlington Road (24 docking points). These docking stations are under significant strain due to increasing demand which will only be exacerbated by this development.

Trip generation and trip distribution

Surveys of the existing food store have been carried out for a weekday and a Saturday. However, TfL would query whether a Sunday should also be surveyed, as shorter shopping hours can result in a higher hourly trip rate for supermarkets.

As the proposed new food store would be approximately the same size as the existing, an assumption has been made that the number of trips would remain the same, which seems reasonable. However, the proposals also include smaller scale retail and leisure floorspace. The scoping note states that these uses will be ancillary and will not generate any additional trips, but further information on the intended uses and occupiers of these units will need to be provided to justify this.

For the proposed temporary store, the justification for using discount food retail sites in TRICS is accepted. However, trip generation is only provided for a weekday and a weekend assessment will also be required.

For the proposed residential units, the use of TRICS is supported. However, searching the TRICS database with the same parameters as outlined in the scoping note results in six sites being identified rather than the five used in the assessment, with an additional site in Richmond resulting in slightly higher trip rates. Census data has then been used to obtain a mode split, with adjustments to take account of the car free nature of the proposals.

Whilst this overall approach seems reasonable, it doesn't seem realistic to assume that every parking space provided for those parts of the scheme which are not car free results in a peak hour car trip being generated. A proportion of these trips should be allocated to public transport. Please also note that Tables 4.8 and 4.9 of the scoping note are not consistent, and if no car parking is to be provided for the flats above the petrol station then these should not generate car trips.

Again, trip generation for office use has been taken from TRICS. Whilst this is TfL's suggested methodology, the use of only two sites raises concerns about sample size, and the resultant trip rate appears relatively low. A first principles approach may be more robust in this case. The use of census data to determine modal share is again reasonable, although it should not be assumed that all rail trips use Kentish Town West as the nearest rail station. This will include trips into central London termini which will then subsequently use underground or buses to reach the site, as census data will only give you information on the main mode of travel.

Road network

At this stage, TfL considers there is unlikely to be any adverse highway impacts upon the TLRN or SRN when compared to the existing use of the site. There are however issues relating to the operation of Juniper Crescent and Juniper Crescent/Chalk Farm Road junction that should be addressed. An existing crossover (entry/egress) from Chalk Farm Road would be removed from the existing and proposed petrol station site, subject to a s278 agreement with Camden, and all access will be from Juniper Crescent/Chalk Farm Road junction. Changes are proposed to this junction which are detailed further below.

Public transport network

As stated above, there is an existing bus standing facility, with bus stops, adjacent to the existing Morrisons store and by the existing petrol station. There is a proposal by the developer to relocate the facility by the store to Juniper Crescent and TfL is concerned how this proposed new arrangement will operate. Detailed plans have not been submitted to TfL to demonstrate the intended arrangements. TfL requests that a concept design is submitted to TfL for comment, accompanied by a swept path analysis and road safety audit, prior to the planning application being lodged with the borough. TfL seeks that any existing standing and stopping capacity is retained and that there is nil detriment to buses. TfL would also expect that relocated bus stops are DDA compliant and funding is secured for London Landmark Model shelters to be installed.

It should also be confirmed to TfL that the existing bus stand, by the existing and proposed petrol station, is retained (with a stop post but not a shelter). The scheme should also incorporate drivers' toilets to be located in close proximity to the relocated bus stand. An appropriate lease arrangement will need to be agreed with TfL (London Buses) and the developer for the bus stands/stops and drivers toilets, securing 24/7 access. This should be secured in the s106 agreement.

Due to the anticipated trip generation from this development, TfL may consider that bus service capacity enhancements are required to mitigate the impact of this development. TfL would expect the TA to detail expected bus trips by route, direction of travel and time of day in order for TfL to make an informed assessment.

Any demolition, structural works, excavations, boreholes or piling within 25 metres of the Northern line tunnels under Chalk Farm Road would require the separate approval of London Underground (LU). LU will respond separately when an application is submitted to Council. Similarly there are infrastructure protection provisions in respect of the London Overground (LO) railway line which bisects the site – which would involve both NR and LO.

Walking and cycling

It is understood that Camden have raised concerns with the developer about the safety of cyclists to the junction of Chalk Farm Road and Juniper Crescent and have suggested a scheme to upgrade the junction for the betterment of cyclists and pedestrians. Subject to bus impacts mentioned below, these works are in principle welcomed by TfL, and should be undertaken via a s278 agreement with Camden, secured as a part of the S106 agreement. Any changes to the layout or signalling at the junction should be of nil detriment to the operation of buses and this should be demonstrated to TfL. TfL and Camden will need to agree on the type of modelling required and this modelling should include an analysis of the existing junction environment and proposed.

A PERS (pedestrian) and CERS (cycling) audit should be undertaken to identify any improvements to the pedestrian and cycling environment locally, particularly addressing any improvements to improve cyclists safety along Juniper Crescent which connects to Chalk farm Road. There is a proposal by the developer to improve the pedestrian realm and effectively widen the pavement along Juniper

Crescent; these improvements are generally supported by TfL subject to there being no adverse impacts upon buses and cyclists.

There is an existing pedestrian and cyclist link between Gibleys Yard and the Morrison's site that would benefit from enhancements to improve the public realm for pedestrians and cyclists. These improvements should tie into the public realm enhancements for the site and should be secured as part of a S106 agreement.

Cycle parking should be provided in accordance with the London Plan (2015) standards and TfL would not accept provision below these standards. All cycle parking should be located within suitable secure convenient and well lit spaces and, with the exception of short stay parking. In addition cyclist facilities (showers, lockers and changing areas) should be provided for staff of commercial uses, including the supermarket. A proportion of the spaces for each user group should be for larger bikes suitable for disabled cyclists, cargo bikes and carer/child ones.

In addition given the likely demand from this development especially in the context of an existing shortage of available docking points in the area; TfL considers that a site specific s106 contribution of £220,000 for a 32 dock cycle hire station is justified. TfL also requires that land is secured on site for a docking station both in physical terms and through an appropriate lease, these should be part of the s106 agreement. It is important to note that a docking station must be able to be serviced by a vehicle. These vehicles are approximately 7m long by 2m wide. The travel plan should also secure funding for cycle hire membership for each residential unit for five years (£270 per unit per year).

The site may be enhanced by the installation of Legible London signage to enable cyclists and pedestrians to identify local areas of interest. Consideration should also be given to altering existing signs in the vicinity to reflect the new development.

Car Parking

The residential and commercial (non supermarket) aspects of the development are car free, with the exception of blue badge parking. This approach is supported by TfL subject to the inclusion of resident exemption from parking permits (except blue badge holders) and policy compliant electric vehicle charge points and blue badge parking and on site car club provision. The level of blue badge parking should comply with the standards set out in the Accessible London SPG (2014) and Housing SPG and in the London Plan itself. If these standards cannot be met, justification should be given in the TA in terms of alternatives for disabled and others with less mobility to access the site. The Council may have a view on this matter also.

It is proposed to provide a foodstore car park comprising 300 spaces, a reduction of 125 spaces. Whilst TfL welcomes the reduction in car parking, this provision remains above London Plan standards and the developer should consider a further reduction to recognise the high PTAL of the site and location. London Plan maximum standards for a store of the size proposed are in the range between 184 and 279 spaces. TfL requests that a comparative analysis is undertaken to compare the site to recent examples of developments for supermarkets. The examples provided in the application material are predominantly pre 2015, prior to

the adoption of the London Plan (2015) and associated car parking standards. An example of a recent supermarket application in a comparable location with lower levels of parking is the Sainsbury's supermarket in Whitechapel. In any circumstance there should be appropriate policy compliant provision of Blue Badge parking, carer and child, car club and electric vehicle charging points. There should also be provision in the scheme for set down/pick for taxis and private hire vehicles, particularly for disabled people.

Travel planning

A travel plan for each element of the scheme will be required, to be agreed by the Council, prior to first occupation of the development. The travel plan should be secured, enforced, monitored and reviewed as part of the S106 agreement. Each travel plan should have ambitious targets, particularly with respect to increasing walking and cycling mode share, and contain measures to meet these targets.

Further information can be found on TfL's website at the following link:

<http://www.tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

Delivery service plan

On site delivery and servicing is proposed which is acceptable to TfL in principle. However it is unclear how this will operate in relation to the location of the proposed relocated bus stand. This will become clearer when a concept plan is submitted to TfL showing the proposed relocation of the bus stand/stops. A Delivery and Servicing Plan (DSP) will be required, to be agreed by the Council prior to first occupation and secured through condition/s106 agreement.

Further information can be found on TfL's website at the following link:

<https://www.tfl.gov.uk/info-for/freight/planning/delivery-and-servicing-plans>

Construction

Given the scale and location of the development, a Construction Logistics Plan (CLP), in line with TfL guidance, will also be required. The CLP will need to be agreed by the Council prior to commencement and secured by condition or by way of the s106 agreement. The TA should contain the outline of the CLP, including key information such as the objectives of the CLP, how construction (including site clearance) will be phased and how impacts will be dealt with, construction traffic routing and how the potential impact on the surrounding highway network, bus services and cyclists will be minimised. The CLP should also address potential impacts on LU and NR infrastructure and upon LO operations.

Further information can be found on TfL's website at the following link:

<https://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans>

S106 Contributions. Community Infrastructure Levy (CIL) and Supplementary Planning Guidance (SPG)

Within this letter, a number of elements have been identified for inclusion in the 'heads of terms' of the s106 agreement. Once the TA has been further advanced and has assessed the likely impacts of the proposals on the transport network, detailed mitigation measures can then be further discussed and subsequently agreed with TfL and the London Borough of Camden. TfL seeks that it is a signatory given the implications of this development on buses.

As alluded to previously, TfL would expect a clear statement, in the form of 'Heads of Terms', showing all the transport-related contributions that the development is expected to provide in the s106 agreement, to be included in the application material.

If you have any queries, have further questions or seek clarification please contact the case officer Tristan Gielen (0203 054 7027 or email tristangielen@tfl.gov.uk) in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lucinda Turner', with a stylized flourish at the end.

Lucinda Turner
Acting Director of Borough Planning
Email: Lucindaturner@tfl.gov.uk
Direct line: 020 3054 7022

Cc : Meeting attendees as advised above

Appendix 5: Developer's Briefing feedback

Morrisons, Chalk Farm Road DM Forum

Monday 5 December 2016

Notes

Attendance

J Constantine	Modern Age
T Kearney	Modern Age
M Kearney	
L Weale	
M Fernandes	
Paul Whitley	Harmood and Hartland Road RA
Jonathan Root	
Chris Hageman	One Housing Group
Julie de Senneville	One Housing Group
Natalia Kireeva	
A Mozeikie	
Beth Watkins	
Victoria Baisotti	
Tom King	The Roundhouse
Paula Armstrong	
Freddy Donaldson	Camden Assembly
Monika Petrasova	Juniper Crescent RTA
Catherine McQueen	
Karl Lewkowicz	
Bortolo Baisotti	
Mark Butler	The Roundhouse
Zita Baptista	
Peter Lyons	
E McInally	
Mark Neal	
Rathi Kumar	The Roundhouse
June Hajjay	
Mohammed Hajjay	
Karim Ullaa	

Councillors

Oliver Cooper	Hampstead Town Ward
---------------	---------------------

Camden Council officers

Elizabeth Beaumont	Manager Planning Solutions (Chair)
Gavin Sexton	Principal planning officer
Dawn Allott	Community Liaison Officer (Notes)

Introduction

Elizabeth Beaumont (EB) explained the purpose of the meeting was to engage the local community into the pre-application proposals for the site. The forum was not for decision making, nor does it replace formal consultation.

Officer Presentation

Gavin Sexton (GS) gave an overview of the site location, relevant history and explained the relevant planning considerations on and near the site.

Developer Presentation

Martin Scholar (MS) opened with some background to Barratts developments in Camden and concepts for the site.

Kirsty Leslie (KL) and Hendrik Heyns (HH) presented the proposals. The presentation slides presented the context, an overview of the landscaping concept, description of the considerations that have guided how the development has been laid out, an overview of the proposed masterplan identifying key routes and spaces, some discussion on townscape and an explanation of the approach to the petrol filling station,

Questions and comments

Main issues

- **Height, sunlight and daylight, overlooking**
- **Anti social behaviour (ASB)**
- **Impact on transport, NHS and schools**
- **Construction management**
- **Parking**
- **Other issues: CIL, compensation for residents and need for further consultation**

Height, sunlight and daylight, overlooking Comments & questions

- Strong concern was expressed about the 17 storey 'marker' building which was commented to be 'out of keeping with the area' and 'not needed'.
- Questions were raised about the location of the taller buildings and concern whether these were planned to be located on the higher levels of the site.

- A suggestion was made to 'dig into the hill' to reduce the overall height
- Specific concerns were raised about the impact and heights of buildings adjacent to Gilbeys Yard and Juniper Crescent and overlooking in relation to Juniper Crescent.
- Concern was expressed about how the taller buildings were represented in the presentation material
- Guarantees were sought that 'no light will be taken from existing properties' and requested a 17 storey balloon be put in place on a specified day to show actual height of building

Replies from developer

- Base heights are 6/7/8 storeys but looking to achieve higher in certain points across the site.
- Proposing 3-5 storeys adjacent to Gilbeys Yard, looking at 17 storeys adjacent to Juniper Crescent
- Heights along Gilbeys Yard can be moderated to 3-4 storeys which is within acceptable levels of daylight
- Currently testing heights of 10 storeys adjacent to Oval Road.
- Buildings must be designed in a manner to prevent overlooking in order to meet planning policy
- Applicant team are still exploring heights but planning policy is to optimise the development of well-connected town centre sites which leads to additional height.
- Presentation focuses on lower levels of the buildings as heights are not yet fixed
- Balloons are not a useful tool for showing the impact of tall buildings, the applicant team are working up verified views from a range of aspects which will be submitted with the application.

Anti social behaviour (ASB)

- There was support for a request that the new petrol station should include public toilets.

- Gilbeys Yard is currently affected by ASB and would want to see the gate at the Interchange permanently locked. There was resistance to development proposals to open up access to Camden Market.
- Residents of Juniper Crescent concerned about the use of open spaces leading to ASB and noise in particular – how does the developer intend to prevent this happening?
- Some residents had understood there would be a private security team present once the development is complete.

Replies

- Applicant aware of issue with the existing temporary urinals and is looking to incorporate 24 hour toilets in to the new petrol station.
- The developer team hope that natural surveillance will reduce levels of anti social behaviour and they will work with planning officers on this issue. Routes and open spaces will be overlooked but will consider CCTV as part of proposal. Proposal includes a 24 hour concierge service not an onsite security team but will consider it.
- GS: aware of ASB around the site. Urban design principles are to open up sites and the matter will be carefully considered.

Parking

- Clarity was sought on the location and number of parking spaces.

Replies

- Developer confirmed they are proposing a 300 space Morrisons car park (reduction on existing 425 spaces) and that the new housing will be car free with 10% disabled car parking spaces
- GS confirmed that the car-free policy means new residents would not be eligible for on-street car parking.

Further comment

- Many residents unconvinced by explanation of car free policy believing occupiers will find a way round it. Also doesn't make sense given the current demand on public transport systems.
- One resident of Gilbeys Yard spoke in favour of car free housing.

Impact on transport, NHS and schools

- Car free housing questions led on to discussion and comment around the impact on existing public transport services.
- Strong views were presented that the local public transport network has no more capacity for additional passengers and the scheme should be rethought. The weekend closure of Camden Town tube station was raised as indication of the problem. It was suggested that a development on such a scale would be dangerous.
- Strong concerns were also expressed about the capacity of local NHS services and school admissions.
- Concern was raised about the temporary closure of the Petrol Filling Station, with the likely impact on traffic from having to travel to Haverstock Hill for petrol.

Replies

- Developer view is that reduction in shopping parking will have a positive impact GS: explained the planned new entrance to Camden Town Tube will alleviate some pressure and that a detailed travel/transport assessment will be carried out as part of the application process.

Construction management

- Residents queried the expected construction period and the planned mitigation for the residents of Gilbeys Yard and Juniper Crescent?
- Request made that construction only happens between 9 am and 5pm and not at all on Saturday.
- Residents of Gilbeys Yard voiced particular concerns based on previous experience of the construction of the Lock House and the contractors not adhering to the hours of operation and of the surface of the Yard being damaged by construction vehicles.
- A resident of Oval Road raised concerns about the timing of the development in relation to other proposals in the area HS2/Centric Close.
- Cllr Cooper stated there must be joined up thinking regarding HS2 construction.

Replies

- Developer confirmed construction period will be 3 years and that a Construction Management Plan (CMP) will be agreed before commencement. CMP will take into account neighbours amenity and will cover noise/dust etc. Resident hotlines and liaison will be provided.
- The CMP will also take into account other existing and proposed development and it is proposed that all construction traffic will access and exit the site via Chalk Farm Road.
- The Chair, Elizabeth Beaumont, explained the CMP process and that it will control hours of construction and take into account other development in the area.

Affordable housing, investment property

- Several questions were raised about the quantity and type of affordable housing, the ratio of affordable housing : investment housing and the sale price.
- It was stated that residents do not want to see empty investment properties.
- Cllr Cooper sought assurance that all of the affordable housing element would be provided on site.

Replies

- Developer confirmed mixed tenure affordable would be provided on site but could not confirm quantity at present time. Quantity would be decided based on results of viability assessment. The ballpark figure is 30% and the current average for Barratt developments is 35%

CIL, further consultation and compensation for residents

CIL

A query was raised about whether the CIL been worked out and can residents be involved in decisions about spending?

Replies

- Final floorspace not yet known so CIL cannot be calculated.
- GS: The Council has a published list of CIL priorities and a proportion will be spent locally.

Compensation

A query was raised about what compensation is on offer to residents.

Reply:

- No financial compensation would be provided, but the scheme would be designed to meet policy so that the amenity of residents would be preserved.

Further consultation

Paul Whitley: strategic planning is sensible but more detail is now needed for residents to be able to comments further. More consultation is needed.

Response:

- There will be a further round of consultation in February.

DM Forum – Morrisons Superstore and petrol station, Chalk Farm Road

Tuesday 9th May 2017

Attendees

Name	Group
Hero Granger Taylor	Civic Society
Anor Miah	
Amir Ulissam	
Del Brenner	Regents Canal CAAC
Steve Stokes	Gilbeys Yard TA
Lyn Neale	
Theepan Saravanapavan	
Maria Fernandes	
M Silverman	
Karim Ullah	
Iynn Caulfield	One Housing
Fiona Trier	
Peter Clapp	
John Chapman	
Helia Evans	
Adrian Richardson	Primrose Hill CAAC
Victoria Smith	
Reinhard Fischer-	
Fuerwentsches	
Monika Petrasou	Juniper Crescent TRA
Paul Whitley	Camden Goods Yard Working group
Mark Neal	Camden Goods yard Working group
Carole Sandman	
John Green	Jeffreys Street Association
Tony Kerpel	
Michael nathan	
M D Oberst	
S Christofi	Camden Town DMC
D Cawson	
Peter Lyons	HRRA
J Mitchell	
B Weatherburn	
Virginia Gumley	
M Crotty	
Herman Tribelnig	CaTUDIS
Posemary Lewin	Kelly Street RA
Fabrizio Lepore	Kentish Town Neighbourhood Forum
Caroline Cutty	
Michael beale	
Roger Winfield	Kentish Town Neighbourhood Forum
Peter Hillhouse	

David Hughes	
Jamie Johnston	
Kay Crewe	
Margaret Richardson	
Zoraida Berongar	
Mary Rutherford	
Richard Simpson	Primrose Hill CAAC
Peter Mitchell	
Margaret O'Brien	
M Betts	
L Rivkin	Primrose Hill CAAC
Karl Lewkowicz	
Oliver Tobias	
Mena Charlick	
Colin Altman	
Mike Kenney	
S Butler	
Nicholas Williams	
R Islam	
Peter Keserve	

Councillors

Cllr Pat Callaghan Ward councillor Camden Town and Primrose Hill

Camden Council Officers

Elizabeth Beaumont (EB)	Manager Planning Solutions (Chair)
Gavin Sexton (GS)	Principal Planning Officer
Dawn Allott (DA)	Community Liaison Officer
Kristina Smith (KS)	Planning Officer (notes)

Developer team

Attzaz Rashid (AR)	Barratt Homes
Martin Scholar (MS)	Barratt Homes
Hendrick Heyns (HH)	Allies and Morrison (Architects)
Michael Lowndes (ML)	Turley (Planning agents)
Simon Hall	<u>Ardent (Transport consultants)</u>

Please add the attendees and Cllrs

Welcome and Introduction

- Elizabeth Beaumont (EB) introduced the Forum and explained the purpose was to update and provide more detail on the proposals originally presented at the previous

DM Forum and Barratt's consultation event held at the Pirate Castle on 21st and 22nd April.

- EB emphasised meeting was about the proposed development and not any other schemes.
- Introduced Gavin Sexton (GS), the lead planning officer, and the developer team.

Officer presentation

- GS gave presentation covering summary of site, policy context and main planning considerations

Developer presentation

- Hendrik Heyns (HH) gave presentation with slides covering:
 - site context
 - changes to the proposals since last DM Forum
 - the current scheme features including:
 - design approach to the petrol filling station
 - public space
 - mix of uses including affordable workspace, urban farm
 - landscaping
 - views from within and from outside the development
 - relationship with Juniper Crescent and Gilbey's Yard
 - daylight/sunlight study
 - routes and connections
 - public toilets

Questions and comments

Questions were received from attendees on a number of different topics and issues to which the developer and Council officers responded to.

Questions and responses (grouped by theme)

Local services (including schools and GPs)

- How has the impact on local services been considered? (Peter Mitchell, local resident)
- Local people will need to have confidence that schools and health services can cope with increased demand (Cllr Callaghan)

Response

- Michael Lowndes (ML) set out that the development would add c.1200 residents to the site including c.186 children. ML explained that calculations have been carried out on the impact from this increase and is confident that the new population can be accommodated by existing facilities. Payments will be made through CIL to ensure surrounding facilities are equipped.

- ML explained that impacts will be assessed and measures put in place to mitigate as part of the process of the planning application. If there is a deficit then the developer will pay for increased facilities. There is room on site to accommodate facilities such as a new surgery, if necessary.

Density and Height

- What is the density and the distance between two tallest blocks (Steve Christoffi,)
- Would appreciate a non-commercial justification of heights (Robert, long-term resident)
- Is there an example of 14 storey building this close to residential elsewhere? (Monica local resident)
- Concerned that Block A is still too high
- Disparity between residents and developer over height is reflective of poor consultation
- Actual ground level is Chalk Farm Road as site is elevated ground (Hero Granger Taylor, Camden civic society)

Responses

- ML informed that the overall density of the site is 849 dwellings per ha which is in the middle of the Mayor's range, especially for site with high PTAL
- David Cawston from Piercy & Co Architects confirmed that the two buildings are 12m apart at nearest point
- GS added that the site is at a low level of density currently and London Plan requires Council to optimise density levels. LB Camden policies require Council to maximise housing provision.
- ML explained that the site is a town centre location where growth has to happen to meet housing targets
- ML explained that a main consideration was sensitive viewpoints and how the height sits in townscape
- ML confirmed there are plenty of examples where tall residential buildings are close to each other but also it is less about height than impact. The council will reach a balanced view on the impact of the height on existing and new development.
- ML explained that a site is a transition between the levels of Oval Road and Chalk Farm Road

Temporary loss of Petrol station and Supermarket

- How long will the petrol station be closed? (Peter, local resident)
- How long will the site be without a supermarket?

Response

- Attzaz Rashid (AR) responded saying that the petrol station will be closed for 18 months. The supermarket will be relocated temporarily to the PFS and main store will close as soon as temporary one opens. There is an estimated 5 year construction period for supermarket.

Post Meeting Correction:

AR has advised that his statement was incorrect and that a review of the construction programme estimates that the petrol filling station would be unavailable for trading for a period of approximately 4 years from the start of works.

Safety

- How will night-time safety be assured? (Cllr Callaghan)

Response

ML explained that there will be much more natural surveillance so the area will be automatically safer. The residential units will have 24 hour concierge and security patrols.

Increase in population and tenure mix

- Why is there such a low population yield compared to no. of homes. (Steven Stokes, resident)
- Why is no detailed information available to public?

Response

- ML outlined tenure mix and explained there will be a range of unit sizes but mainly 1 and 2 beds which target the high demand in Camden. Explained methodology to reach population yield and assured it's robust. He added that the developer is sharing information with Council and will be publicly available once the planning application is submitted.

Planning framework

- Welcome the framework however the proposals ignore framework in terms of over development and poor quality (Peter Clapp, local resident)

Response

- ML responded by saying that the scheme is entirely in accordance with framework

Amenity

- Is the developer comfortable with daylight levels?

Response

- ML explained that they are still modelling the impact of the development on neighbours but comfortable with results so far and the development will maintain levels of daylighting that one can expect in this location.

Levels and site accessibility

- What measures have been made to address the mobility issues of site? (Jamie, resident)

Response

- HH informed that the team have worked closely with the Council's access officers to ensure whole site is accessible as possible. Have made the site flat as possible with accessible routes. Where necessary the level differences are overcome by use of lifts but there is a fully accessible longer route as a fallback.

Land ownership

- Does the Council own the land?

Response

- ML informed that Morrisons own the land

Housing and tenure mix

- Is the amount of Affordable Housing going to reduce over period of development?

Response

- ML outlined tenure split incl. Affordable housing and management and AR assured of commitment to deliver 35% AH

Bus stops

- Where will volume of buses go and could the increased traffic be harmful to pedestrians

Response

- Simon Hall (SH) talked through the design approach to the bus stops and stands and advised that the layouts are designed to technical standards in liaison with TfL. A number of pedestrian crossings will be provided to create a better high street feel.

Ramp

- Has the scheme considered removing the ramp (access route to the roundabout)?

Response

- ML responded saying that alternatives were explored but the ramp cannot be removed due to the need to safeguard HS2 access to the Network Rail compound,; however there is potential for the roundabout to change in the future.

Playspace

- Will there be provision of playspace for children of all ages?

Response

- HH explained that playspace is woven in throughout the development and areas to suit all ages

Consultation Process

- Why has there been poor engagement e.g. questionnaires with leading questions and emails bouncing back from website

Response

- MS outlined details of consultation events to date which developer has worked hard on, and emphasised the changes that have happened to scheme as a result

Construction Impact

- How long will the construction period last for?
- Can residents have assurance that construction traffic will not cause harm to surroundings
- What will be the impact in terms of noise and pollution?

Response

- SH explained that construction traffic can only enter via Juniper Crescent. Construction Management Plan (CMP) will include a plan for the approach routes to be used by construction vehicles. If that is not adhered to by contractors then local people can inform the developer. There will be a two-way dialogue between developer and local residents. AR explained that the CMP will cover issues such as dust and noise control, There will be strict working hours and a point of contact will be on site at all times to address issues.

Public transport and cycling

- Will Chalk Farm Road take bulk of new transport? Will secure cycle storage be provided as part of development?

Response

- SH explained methodology to reaching footfall levels and that projections are comfortably in accordance with TfL's pedestrian comfort assessment AR confirmed that secure cycle storage will be provided as part of development and they are also looking at 'Boris' bikes.

Transport demands incl. Deliveries and taxis

- How will deliveries and taxis be dealt with? Concerned that pedestrian streets will be overrun with deliveries Removing barrier will create cut through for motorcycles on Gilbey's Yard and create accident hotspot

Response

- ML explained that a concierge will receive most parcels and distribute
- SH explained that the residential and commercial elements will be car-free. Demand will be met via payments to local authorities to improve highways

Surrounding development

- Has the development considered the cumulative effect of other nearby developments?

Response

- ML confirmed that development has considered nearby schemes. Car-free scheme apt from 16 wheelchair users

Maintenance over long term

- What will long term management plan for the site be? (Mark, local resident)
- ML explained that Morrisons will continue to own the land. Non for profit management team to ensure development continues to be looked after

Trees

- Is there a plan to relocate the trees?

Response

- HH explained that linear park will retain most trees. Where trees are to be felled, semi-mature replacement trees will be provided. Some trees can be relocated. Council's tree officer is a consultee of the application

Ends

Appendix 6: Vision and Principles

Vision and Objectives

The Developer's Vision and Objectives

The LPA supports the Developer's vision for the project which 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*'.

The Developer's vision is supported by a series of principles which will be refined and finalised in due course. They can be summarised as follows:

- **Place making:** The design team will engage with, investigate and take advantage of the range of constraints and opportunities across these sites to realise the best possible place.
- **Future proofing:** The proposals will support other development coming forwards in the vicinity.
- **Heritage:** The proposals will deliver a significant number of new homes (responding to local need and demand)
- **Workspace:** A critical mass of new workspace will be delivered that will support the creation of a genuinely dynamic place, as well as the local business economy.
- **Sustainable Transport:** The proposals will prioritise: i) pedestrians ii) bicycles iii) access to public transport iv) servicing requirements and car parking.
- **Health, well-being and community safety:** The proposals will support the Council's health and well-being objectives and promote community safety.
- **Consultation:** The Developer will continue to follow a considered and thoughtful approach to local and wider stakeholder engagement.
- **Long-term Stewardship:** The Developer is committed to long term stewardship and its approach means it will have a direct commitment and involvement in the success and quality of the buildings and environment after work is complete and the last home or unit has been sold or let.

Local Authority's Objectives

The Local Authority's objectives are based on the relevant development plan policies contained within the London Borough of Camden Local Development Framework (LDF) and the London Plan. National planning policy guidance should also be considered, which comes in the form of the National Planning Policy Framework (NPPF). The relevant policies together with any other priorities to be considered as material are detailed in the Council's pre-application advice letter.

In summary the main objectives of the local authority in relation to the development are to achieve a new mixed-use neighbourhood which:

- Responds to Camden's growing population and to social change in the way residents live their lives including how they work, shop and spend leisure time together with how they access services.
- Supports Camden's social mix by providing a diverse range of housing in sustainable communities, having regard to Camden's mixed use policy which promotes new residential accommodation.
- Plays a role in promoting and encouraging healthy lifestyles of people of all ages by responding to local community safety concerns and creating an environment which is conducive to the health and wellbeing of all those living, working and visiting the site and may include provision of a new public sports facility, if viable and feasible.
- Is based on a high quality layout of streets and spaces, designed using best place-making and urban design principles, for and of Camden Town.
- Provides a high quality and sympathetically designed series of buildings which integrates any additional height in such a way that respects nearby heritage assets, improves upon the appearance of the area and responds positively to the character and heritage of the surrounding townscape.
- Provides a range and variety of attractive, engaging, robust but people-friendly public open spaces, including green space and areas for play.
- Plays a positive strategic role in supporting the potential redevelopment of neighbouring sites, by responding to site boundaries, edge conditions and ease of movement through and between sites.
- Supports resident's access to employment opportunities, by providing a range of flexible office and/or workshop space that is suitable and affordable for SMEs ranging from start-ups to growing and established businesses; and responds to the local economy and Camden's growth sectors in creative industries, professional and business services and science and technology.
- Promote accessibility and travel that is easy, safe, healthy and does not harm the local environment or contribute to climate change.
- Manages the impacts of the night time economy on residents while broadening the appeal of Camden Town.
- Any other priorities that may be identified through pre-application discussions with the Developer and consultation with the community.

Appendix 7: Alternative Child Yield Methodology (LBC)

CPG6 Appendix B Figure 8.	0.04	0.25	1.15	1.44	1.44	0.04	0.25	1.15	1.44	1.44	0.04	0.25	1.15	1.44	1.44	
Child Yield per Tenure (Camden Survey of New Housing 2002-08)	0.04	0.14	0.37	1.55	1.55	0.10	1.24	1.53	2.60	2.60	0.10	1.24	1.53	2.60	2.60	
	Private					Social Rent					Intermediate					Total
	1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom	1 bedroom SR	2 bedroom SR	3 bedroom SR	4 bedroom SR	5 bedroom SR	1 bedroom int.	2 bedroom int.	3 bedroom int.	4 bedroom int.	5 bedroom int.	
Number of units	202	146	41	0	0	23	29	42	8	0	46	36	0	0	573	
Child yield (Camden Survey of New Housing (2002-08)	8.08	20.44	15.17	0.00	0.00	2.30	35.96	64.26	20.80	0.00	4.60	44.64	0.00	0.00	216.25	
Child yield (CPG6 Appendix B Figure 8. Occupancy rate for C3 homes	8.08	36.50	47.15	0.00	0.00	0.92	7.25	48.30	11.52	0.00	1.84	9.00	0.00	0.00	170.56	

Turley Office
The Charlotte Building
17 Gresse Street
London
W1T 1QL

T 020 7851 4010

Turley

Prepared by:
Turley

On behalf of:
Safeway Stores Limited and BDW Trading Limited



BARRATT
— LONDON —