

## CAMDEN GOODS YARD WORKING GROUP

### MORRISONS BARRATT JULY 2017 APPLICATION CONCERNS

1<sup>st</sup> September 2017

**Summary Position:** The CGYWG welcomes the principle of a high-quality development of the Morrisons site that maximises the potential of the site within a holistic and coordinated strategy of the whole Camden Goods Yard as guided by the CGY Planning Framework (the “Framework”). It considers that the submitted scheme at present fails to fulfil a coherent strategy to do so in several respects.

#### 1. Strategic Site Layout: Linkages

The layout fails to create the conditions for a hierarchy of routes that would directly link the site with the rest of the Camden Goods Yard and the surrounding areas.

1.1 The intended primary route through Roundhouse Way lacks primacy. It is convoluted, indirect, narrow and requires 3m level changes down and back up to Juniper Crescent and lacks visual permeability. It is simply the residual space left over between building blocks whose positioning – particularly of Block B – has driven the site layout. The Framework properly shows the importance of this primary route as a spine that ultimately would join the Oval Road with the Roundhouse (this would require neighbouring resident amenity protection measures at each end, dealt with under that section below). See also the comments in relation to the quality of the public realm on Roundhouse Way; as modified it would also be able to properly frame views of the Roundhouse, and thus greatly enhance its setting as called for in the Framework.

1.2 The scheme’s park position does not allow it to be part of a future Highline verdant linear route that joined one end of the Camden Goods Yard to the other in an easy, natural, direct and level way, as would be the case if the linear park was adjacent to the main railway line at the south-west of the site. Although the Framework does aspire to a connection to the overland goods line that runs past this site, in practice this is not possible as the redundant section of rail track stops at Camden Gardens.

In being positioned at the south-west edge, it would then easily link with the canal from where one would reach the main section of the Highline at Camden Gardens. This linear park would then form part of a wider cycle network and a wild habitat green lung connecting the canal up to the Grade 11\* Euston Portals. A further benefit of the linear park along this edge is that it would integrate the Winding Vaults within the pedestrian / leisure circulation connections.

1.3 The scheme’s level change position from Chalk Farm Road to Oval Road fails to facilitate any additional direct and level routes in and out of the site to Chalk Farm Road, as would have been the case had a lower level street extended to the south-east corner and hence to connect to the Stables Market and to Camden Lock Place without change of level, as the Framework calls for. Market Tech are committed in principle to allowing this connection on this basis. A difficulty of the scheme’s intended connection to Camden Lock Place at high level is that this would promote the influx of the market and night-time economy visitors into Gilbeys Yard and the new residential areas to the detriment of their amenity.

## **2. Land Use in Strategic Site Layout.**

- 2.1 The strategic land use layout fails to protect the amenity of existing and new residential areas from the transient daily population influx arriving to work or use the adjacent market and night time economies.

The proposed ground floor uses on of Makers Yard and Roundhouse Way are predominantly of office and workspace, which would create an employment led character on these streets, whereas the proposal should focus the office space to a band on the north east of the site, leaving the rest of the Morrisons site to be of mixed use without that focus as set out in the land use diagram in the adopted Framework P32.

By having the south-western half of the site as being a predominantly residential mixed-use area (with some ancillary small scale local retail or local café use at ground floor level) the new and existing adjacent residential areas have their amenity protected from disturbance from the transient daily influx of office workers, and the commercial focus mixed use area then serves as a buffer zone between the residential and the adjacent market and night time economy areas.

## **3. Land Use Mix.**

- 3.1 The scheme's GEA breaks into around 62% residential to 38% non-residential floorspace (planning statement table 4.6). Of the 14,325 sq m of office and workspace, only 1,344 sq m is either workspace affordable office, i.e. 10%.

In 2015-16, Camden's exceeded the GLA set dwellings target by an additional 50% (Provision of 1334 homes against London Plan OAN benchmark of 889 homes). LB Camden Employment Land Study 2014 forecast that Camden requires 684,000 sqm new office floorspace and that the most critical issue need was for premises in central London and in Camden Town Centre to nurture small dynamic businesses.

Given Camden's recent over provision of housing against GLA annual targets as compared with the under-provision of SME employment space, the proportion of employment space should increase to nearer 50%, with at least 20% of the whole to be affordable offices and workspace.

- 3.2 The non-Morrison foodstore A1-4 uses (retail and café) area is only of 3.5% of the whole. This proportion should at least double to mitigate against the domination of retail use by Morrison which would prevent the diversity and variety of commercial offer required by the Framework. The non-Morrison A1-A4 use should be restricted by S106 to being for use only by small scale independents providing goods aimed at the local residential and office markets and should be of affordable rents to allow such small-scale independents to compete with the overwhelming buying power of Morrison.

#### 4. Protection of Heritage Assets.

4.1 Summary. The height, bulk and siting of the buildings fail to preserve or enhance the setting of the Primrose Hill Conservation Area, the Regents Canal Conservation Area, the nearby Grade 11 Interchange building, and the Grade 11\* Roundhouse and the Horse Hospital. The cumulative effect of buildings and areas is of a high heritage value and therefore there is a high sensitivity to any change. Their settings – as described below – make a major contribution to their significance and therefore are worthy of a high degree of protection. The Harmood Street Conservation Area is also impacted though the harm created to that is not as significant as to the other assets.

4.2 Primrose Hill Conservation Area. The harm caused to the Primrose Hill Conservation Area is most clearly evidenced by the view down Edis Street of buildings the top 4 floors of A1, 5 floors of A2 and 2 floors of F. A fundamental feature of the character of this part of the conservation area is the uniformity of the sky horizon above a simple regular rhythm of articulation in the fenestration. By contrast, the appearance of this collection of buildings is muddled and it dominates the skyline.

As such, it substantially harms the heritage significance of this part of the conservation area.

It is not here being argued that there should be no building visible from the Conservation Area. Whatever does appear must either preserve or enhance (“compliment”) the setting of the Conservation Area, which this muddle of three buildings significantly fails to do. If only the top of building F was visible, then there would still be harm but it would be minor and would sit in a context of a of horizontal “layering” of rooflines as the applicant and Camden have sought to argue this proposal manifests. If only building A2 were visible, then it may be that this taller narrow building could act as a complimentary foil to the horizontal skyline of its foreground context.

4.3 The Roundhouse. The harm to the Roundhouse is created by building A2 breaking of the Roundhouse skyline as evidenced by the views down Haverstock Hill. The Framework notes that *the striking views of the Roundhouse’s prominent roof form and skyline from a short distance south of Steeles Road is particularly important.* View 05 in the Townscape & Visual Assessment down Haverstock Hill shows building A2 dominating over the top of the Roundhouse and building B breaking the Roundhouse skyline. View 21 by Chalk Farm station shows building A2 breaking the Roundhouse skyline.

Views from within the new development of the Roundhouse are also severely compromised. There is a visualisation of the view from the only place where such a view is possible: on the eastern edge of the Roundhouse Way. From this vantage point, one can see how the Roundhouse is dwarfed by the scale of the buildings framing it. It is also important to note that if the viewer moved to the centre of that street, the view would be entirely lost by the interjection of block A2.

The Applicant considers this impact to be of a low impact on the high value receptor, and thereby concludes that the effect on the significance on the asset would be minor adverse. It is unfortunate that the ability to see the Roundhouse in the round has been compromised already by recent consents for extensions to the Roundhouse complex and for a new development on the One Housing Association site, which weakens its heritage significance

and the case against further erosion of its visibility. Nonetheless, because of the cumulative impact on the Roundhouse from within the development and a variety of views without, and because of the importance of the Roundhouse's skyline as recognised by the Framework, the CGYWG considers the proposals to cause minor harm to a high value asset.

- 4.4 The Interchange Building. The applicant has not sought to demonstrate in any views the impact of buildings C1 & C2 on the setting of the Interchange building when viewed from the many vantage points in between the two buildings. The "shoulder" of the Interchange, i.e. the height of the mass excluding the water tower is around 15m from above the +34.5 level of the upper ground floor. Building C2 faces the Interchange across the open space of Interchange Yard and its top is at +63.35m, i.e. it is 29 m high or nearly twice times the height of than the mass of its grade 11 listed neighbour. Building C1, closely connected to C2, is higher again, whose top is at +71.25m, i.e. 36.75m high. The Framework recognised the importance of this frontage to the Interchange with its distinctive water tower. Any viewer in the setting of the listed building to its north would sense the domination of the new buildings over the grade 11 listed one.

The CGYWG recognises the benefit of there being built form as the setting of the Interchange instead of the bare open car park, and the immediate built form facing it should seek to have a harmonious relationship with its listed neighbour. The CGYWG considers that the C2 height – at twice that of the mass of the Interchange - causes unduly dominates the neighbour whereas if it was of a similar shoulder height to block D and the Interchange it would mediate between the listed building and the much taller 11 story C1 structure behind it.

- 4.5 Horse Hospital with ramps and north boundary wall, and the Regents Canal Conservation Area at the Stables Market. The proposed glazed winter garden structure to the PFS site is a striking contemporary character building intended to signpost the entrance to the development, and there would be potential for a modern building to complement and enhance those assets, as the applicant asserts is the impact.

The applicant's statement of significance of this heritage asset is important. This notes that its architectural interest is in part derived from its value of part of a larger group of buildings associated with the Camden Goods Depot which are unified through their shared material palette, scale and character. It also notes that the Horse Hospital now forms an integral element of its surrounding market context which contributes positively to its significance, and so it has strong group value with the surviving buildings of the 19<sup>th</sup> century industrial townscape. The Horse Hospital's significance is significantly enhanced from the combination of it partaking in this shared material palette, scale and character, shared history as integral parts of the original Camden Goods Yard, and shared group value of buildings in the Stables Market.

However, unfortunately the scale and massing of the PFS building is as such that – no matter what may be the redeeming qualities of its architecture – it dominates the Horse Hospital and its surrounding group of buildings within the "Camden Wall" in this very important part of the Regents Canal Conservation Area. The glazed structure is 35m deep and 35m high: this is 30m higher than the listed wall 15m away and 22m higher than the Horse Hospital itself. This domination is evidenced by views 29 & 31 in the Townscape & Visual Assessment taken northwards on Chalk Farm Road. Glazing is never transparent and it appears as a dominating wall when viewed from the south.

The CGYWG strongly disagrees with the Applicant's assessment that this impact is merely neutral given the dominance of the mass and scale of the new building near this very important group of assets. It clearly neither preserves nor enhances those assets but instead causes substantial harm to the heritage significance of this group of assets.

CGYWG is not averse to a larger "signal" striking contemporary building that compliments the lower brick form of the listed group of structures, which reduces the impact of the stark billboard facing the Horse Hospital of this combination of width and height.

4.6 Harmood Street Conservation Area. The top 6 stores of Building C1 and 4 floors of C2 would be visible down Harmood Street, whose heritage assets are of 2 storey cottages. The Applicant accepts that this would have a moderately adverse impact on the setting of the conservation area. The CGYWG agrees with this and considers that there would be harm - though not significant harm - to the character of the conservation area.

4.7 Public Benefit Consideration. The harm caused to these heritage assets is not outweighed by the economic benefit of the creation of much needed housing as is argued by the Applicant.

Para 132 of the NPPF states that when considering the importance of proposed development on the significance of a designated heritage asset, great weight should be put on the asset's conservation. The more important the asset, the greater the weight should be. The applicant confirms that this would mean that any harm to an asset or its setting should require clear and convincing justification. P 134 confirms that any harm should be weighed against the public (i.e. economic, social or environmental benefits) benefits having regard to the scale of harm and the significance of the asset.

In this case, the issue to be weighed in the balance is not the public benefit of the development per-se, but of the additional height and mass that causes the relevant harm. Does the additional height and mass of the parts of the development provide sufficient economic, social or environmental benefits if that additional mass / bulk is not necessary for the viability of the development? In this context, it is assessed that the existing use value of the site would be in the region of £30m whereas the residual land value of the development would be around £130m, and any reduction of GIA (and a similarly proportionate reduction in affordable housing to maintain the same percentage of the whole) would broadly have a proportion impact on the residual land value.

It is also noted that Camden has exceeded its housing supply target in the last year by 50% and that Camden commercial floorspace demand and supply are broadly in balance; as such the public benefit argument of the need for additional housing or employment space are strongly diminished. There are no social or environmental benefits in the additional mass and height: the reverse is true, as is demonstrated by the comments in other sections of this statement. There are no other compelling planning justifications to outweigh this harm.

## 5. **Public Realm Quality**

5.1 Height to width ratio. Most of the streets have a very high height to width ratio, thus giving a sense at ground level in many places as being overwhelmed by the size of buildings within which the viewer is near. A prime example is the sense of being in a canyon within the so-called primary route of Roundhouse Way (average 15m wide by 32.6m high).

- 5.2 Sunlight / Overshadowing. The planning statement at 7.56 asserts that the overshadowing assessments of all outdoor areas within the site and has shown levels of sunlight availability more than the 50% recommended by the BRE. The GIA report merely shows very small-scale shadow diagrams without any attempt at numerically calculating whether the open spaces meets the BRE standard.

The BRE test for sunlight on open space within a development is for 50% of the area to receive at least 2 hours of sunshine throughout the day at the equinox. The GIA report concludes that 63% of all the open space would achieve 2 hours of sunlight, but the diagrams provided appear to show that Roundhouse Way, Makers Way and Goods Yard (which public spaces are at the heart of this scheme with the likely greatest density of population) would fail this test. Given the scale of this development, it is appropriate that each of the discrete spaces should - in their own right - satisfy the standard.

- 5.3 Visualisations. Although not a reason for refusal, it is worth noting that many of the visualisations of the public areas provide an unrealistically flattering view of the quality of the open spaces: they generally depict the scene with shown the tops of the buildings cut off and sunlight on the ground and lower levels of the walls where it would be impossible to reach. The exact source position, orientation and angle of view has been chosen to give the most flattering impression at the expense of being truly representative of a typical experience of the view or place. An example of the latter is the view of Goods yard from the entrance to the site through the railway viaduct, where the angle cuts off straight ahead view of the wide section of bus stands and road that blights the potential of the pedestrianised forecourt that marks the entry to the Camden Goods Yard as a whole, and to the food store in particular.

## **6. Housing Quality - Residential Amenity**

- 6.1 Dual frontage. GLA policy prescribes that north facing single aspect dwellings (which includes dwellings that face NE, NW or in between) should be avoided, for the principle reasons of securing adequate sunlight and ventilation, together with other benefits of dual aspect and outlook. Apart from the dwellings on the corners, all the dwellings on the NW & NE outward facing frontages of Block B and block F fail this guidance. This is an unacceptably high proportion notwithstanding the urban environment situation.
- 6.2 Sunlight. The GIA report advises that the “majority” of the rooms satisfy the BRE requirement of 5% APSH in the winter months. No proportion is given. An assessment of the diagrams indicates that perhaps 25- 35% of the dwellings would not receive adequate sunlight to the BRE standard. It is noted that the GIA report confirms that 26% of the rooms fail the BRE test for sky visibility, which would explain the sunlight penetration failure. This is an unacceptably high proportion notwithstanding the urban environment situation.
- 6.3 Daylight. The GIA report confirms that 182 out of 1554 habitable rooms fail the BRE standard for daylight, and of these 117 are living rooms or kitchens. This is an unacceptably high proportion notwithstanding the urban environment situation.
- 6.3 Privacy. Most of the habitable room windows within the development are well within the 18m guideline of each other, as clearly shown by para 7.62 of the planning statement, which shows these all to be within 18m, some of which are as close as 12m apart: this difficulty is

magnified by the protruding balconies on all the facades that further diminish by around a further 1.5m the overlooking distance into opposing windows.

The statement's conclusion that this is reasonable given the context of a central location and the need to optimise does not provide the extenuating circumstances to excuse the transgression of the guideline. It is perfectly acceptable for a small percentage of residential windows not to have adequate privacy within a tight urban context, but never the large proportion in this scheme. This is an unacceptably high proportion notwithstanding the urban environment situation.

- 6.4 Outlook. Block E rear bedroom windows on levels 1 & 2 have a device by which a wall is placed in front of a small bay extending from the room with the provision of side window to the extended space to prevent the overlooking problem; however, this protection is at the expense of severe problems with sunlight, daylight and outlook from those rooms.

## **7. Development Impact on Existing Neighbouring Amenity**

- 7.1 Sunlight / Daylight to Habitable Room windows to Juniper Crescent. 7 out of 132 (5%) of the windows facing the development fail to meet the BRE criteria of having a minimum 27% VSC and no less than 80% of its former value.

- 7.2 Privacy to Habitable Rooms at the rear of Gilbey's Yard.

Several of the windows in the proposed development are within the 18m guideline of opposing residential windows at the rear of Gilbey's Yard, where adherence to the guideline is more important:

- Block E1 Levels 1-4 living room windows and corner terraces within 10-14m, levels 5 upwards bedroom windows within 11m.
- Block E2 rear living rooms within 15m. There may be a fence at the boundary with Gilbey's Yard, though none is indicated.
- Block E2 rear landing windows are within 15m, and are not shown as frosted.

- 7.3 Noise / pollution: buses.

There has been a long -standing noise and pollution issue caused by bus parking and idling on the Stephenson Way ramped access to the existing adjacent Juniper Crescent dwellings. The new development will require a considerable increase in the number of buses reaching the site, given the likely increase of the whole of the Camden Goods Yard population to around 5,000 people (the Morrison planning statement refers to the estimated population of 2,500 on the current development site). The new development shows the bus stands as increasing in number and remaining in this place, thus exacerbating the current problem. Bus stands should be located away from residential windows.

The new bus stands and stops should be relocated either to the PFS site adjacent to the viaduct wall behind the petrol station and the active main road frontage, or an expanded layby/bus stop on Haverstock Hill adjacent to Chalk Farm tube, which already is used for this purpose.

There are 6 bus stands shown: this number would increase if the required capacity of a development of the whole of the CGY were taken into account, so as not to prejudice the development of later parts of the CGY coming forward.

- 7.4 Noise / pollution: taxi drop-offs. The scheme does not show the position of taxi-drop-offs. There has been a longstanding problem with taxis coming from the centre of town stopping at the end of Oval Road throughout the day and night to reach the market and night time economy venues on Chalk Farm Road through Gilbey's Yard, as it is the route down Jamestown road is highly congested and the taxis then gets stuck in the one-way system. This has caused an influx of revelling visitors throughout the night with cars revving and slamming of doors etc. The situation will be greatly exacerbated by taxis seeking to reach this new development. The development needs to have a long-term plan of dealing with this problem once the whole of the Camden goods Yard is developed, and a short term S106 contribution to allow mitigating measures to be put in place until Gilbeys Yard is developed.

Taxi drop off positions for the food-store – where there would be a concentration of vehicles arriving to the same spot - should be away from any existing residential windows at Juniper Crescent.

- 7.5 Concierge Position. We consider that the concierge room is in the wrong place. It should be nearer the main entrance off Chalk Farm Road, rather than close to Gilbey's Yard, which position would exacerbate the current nuisance / noise problems of taxi-drop off at Gilbeys Yard resulting from the delivery drivers doing the same with their vehicles, and bring more vehicles unnecessarily though the streets that should be as vehicle free as possible.

## **7. Transport & Highways.**

### **7.1 Vehicle Circulation Strategy.**

- 7.1.1 The vehicle circulation strategy fails to deal with the strategic challenges and opportunities of making the roads as car free as possible, creating the most-needed pedestrianised / cycle routes across the site, creating delivery and servicing arrangements that best protects the pedestrian public realm and residential amenity, and making best use of the levels.
- 7.1.2 The proposal unnecessarily brings cars and buses up to the upper level, where the road use should be strictly limited to deliveries, refuse, emergency vehicles and taxi-drop offs. Bus routes and standing should be accommodated on the PFS site, and access to the food store car park at lower level. This car park access can be accommodated within the same space as taken by the proposal's Stephenson Way as the bus stands on the ramped access road would be removed.
- 7.1.3 Stephenson Way would then no longer be necessary to be retained after 2031. Its removal would then allow the fullest extent of level connectivity across the Morrisons and Juniper Crescent sites and the linking of Oval Road with the Roundhouse as envisaged by the Framework. The released land could be rearranged and landscaped to create a joined up pedestrian public realm at the heart of the whole of the CGY, reaching from the Highline on the south-western edge with the new public square at Goods Yard.
- 7.1.4 A map of local cycle routes is in the Transport Assessment at Figure 3. The Camden Goods Yard creates a blockage preventing continuous cycle route from the centre of London through Regents Park to the north (Kentish Town / Maitland Park): the current proposal does nothing to remedy this lacuna. A level spinal route from Oval Road to the Roundhouse,



connecting eventually to Bridge Approach and via this new central landscaped car free public realm to the Chalk Farm road / Ferdinand Street junction would radically improve the connectivity.

- 7.1.5 Delivery and servicing for the commercially focussed mixed use area could be only from the lower level, thus removing conflict from the predominantly residential. This low-level servicing could also extend to the One Housing & Market Tech land by the Interchange and Gilgamesh, and a low-level route through the car park to Gilbey's Yard which would enable future underground parking and servicing of the One Housing & Market Tech land thus freeing up its upper level from vehicles altogether. Similarly, the road layout just inside the main site by the Chalk Farm Road access could be configured to allow underground parking to the Juniper Crescent site without reducing any of the pedestrianised realm.
- 7.1.6 Taxi-drop / pick up arrangements have not been properly considered in the proposal. There is currently a significant noise / disturbance problem from taxis using Gilbey Yard to drop off / pick up when their passengers arriving from the centre of London to reach the Chalk Farm Road leisure facilities, given the access difficulties via the congested Jamestown Road and the subsequent detour of the Camden town one-way system. This proposal will exacerbate this problem as taxis will not in practice take a long and congested detour to drop their passengers in the new development; the reality of the problem needs to be faced, by dissipating the drop-off points nearer to their destinations. The proposal should allow for access to the upper level from Oval Road upon the redevelopment of the One Housing Association landholdings.
- 7.1.10 Although not a matter for the current application, measures should be made to mitigate the current taxi disturbance problem to Gilbeys Yard in advance of the redevelopment of that land, in cooperation with One Housing Association. This would be achieved by putting double yellow lines on Oval Road after its junction with Jamestown Road up to Gilbey's Yard with the road restriction measures enforced by camera, and a vehicular barrier at the entrance limiting access to permitted vehicles.
- 7.2 The PFS Site, Road Junctions with Chalk Farm Road and Access beneath the Rail Bridge.
  - 7.2.1 The proposal transport strategy for this area fails to deal with several interconnected issues: the required capacity assumptions fail to account for the redevelopment of Juniper Crescent, the removal of the existing road junction produces unacceptable highway issues, the opportunity has been missed for bus stands and movement in and out of the site, and there is insufficient room for cycles and pedestrians under the rail bridge for safety and comfort.
  - 7.2.2 The road junction to the NW of the petrol station has been removed for all vehicles save for petrol tankers or articulated vehicles. This wastes the space of this junction, overly burdens the remaining junction and prevents the ability to use the PFS site as a through route for buses, whose stands could be ideally situated against the viaduct wall away from residential areas. This also means that larger trucks must carry out a 3-point turn across the traffic in the petrol station (Transport Assessment dwg 160630-011) and when they emerge on to the access road out of the main site they must cross into the path of on-coming traffic to turn left on to Chalk Farm Road.
  - 7.2.3 The removal of the junction to the NW of the petrol station produces an unacceptable degree of queuing at the retained junction to the SE. The TA – at para 6.13 – confirms that in

the evening peak hour, the junction would be operating with an overall negative capacity of -7.6% and Chalk Farm Road (east) and Stephenson Way (here called Juniper Crescent) being completely saturated. On Chalk Farm Road, the increase in queuing is of 37.4 seconds, which is a severe impact and hence unacceptable.

- 7.2.4 The junction to the SE of the petrol station being retained has manoeuvring issues for large large-vehicles, all vehicle queuing and cycle capacity / safety issues. Articulated vehicles must cross into opposing traffic lanes (Transport Assessment dwg 160630-010) and the two lanes to the exit can only be 20m long (i.e. takes a bus and a car). Cycles safety is severely compromised: any vehicle turning left must jostle for the same space with cycles around the bend and under the rail bridge, as there is not space to fit a designated cycle route in and out of the site.
- 7.2.5 The TA Future Year Assessment has accounted for the impact of consented schemes but not for the redevelopment of the whole of the Camden Goods Yard. In the context of an adopted Framework that seeks a coordinated and comprehensive approach to the redevelopment of the whole of the Camden Goods Yard, of the clear commercial interest of One Housing Association to carry out such a development as soon as that is feasible to do, of the joint development strategy discussions that have been taking place between Barratt and One, it is at least likely that such an application for the development of the One Housing land will be made within the next 5 years. The CGY Framework requires that the development of any one part in advance of the others should future proof its design so as not to prejudice the development of the rest of the Camden Goods Yard. The TA (para 6.4) confirms that the Guidance on Transport Assessment requires that the design be based on projected traffic flows 5 years after the consent is granted, i.e. to 2024. The TfL – who apparently have advised (at para 6.6) that no growth is expected beyond 2016- have therefore not taken the adoption of the CGY Framework into account in their assessment. Problems that will arise from this lack of future proofing are highlighted by the capacity issues at the main Chalk Farm Road junction wherein two arms would be already completely saturated there is already an unacceptable additional queuing time of 37.4 seconds.
- 7.2.6 The development of the rest of the CGY after the Morrison site could broadly double the living / working population of the CGY from 2,500 people to 5,000 people. Although the future development would not increase the number of private cars entering or leaving, the growth of all other modes of transport (buses, cycles, walking to the tube, taxis, deliveries, refuse servicing etc) would increase proportionately. Save for a possible pedestrian only route under the railway line, this likely increase in population needs to be accounted for in the arrangements for the non-car users. Of this 5,000 people, perhaps 2/3 will be leaving or arriving at the morning peak hour, most of whom will be seeking to pass under the current Chalk Farm Road rail bridge, at which point there is intended to be one pavement of 1.8m wide. The pedestrian congestion and safety issues are plain.

### 7.3 Foodstore Car-Parking

The application is for 300 car park spaces for the foodstore. The TA survey of the existing use of the current car park advised that the maximum number of cars using the car park was 267 on the weekday and 287 at the weekend, of which 13% of the users were not using the foodstore. As such there is a peak current requirement of 250 cars. The provision of an additional 50 car park spaces runs contrary to all policy guidance which seeks to minimise reliance upon the private car for such purposes and promotes instead the use of green travel

plans; the number of spaces should in fact be significantly reduced below 250, and compensating local delivery / taxi / car club arrangements be made.

## **8. S106 and Planning Condition Matters.**

- 8.1 Timing of Complete Representations on the S106 & Conditions There are various S106 matters on which the CGYWG wishes to make its comments, such as relating measures to mitigate the impact on surrounding areas, the management of the open spaces in the development itself, construction and servicing management plans, the setting up of a Community Liaison Group to monitor the development and implementation of the S106 plans arising from the S106 obligations etc a. Should officers express themselves minded to grant approval, then the CGYWG would like to have the opportunity to engage with officers at that time to make its representations. At this stage, the CGYWG would like to highlight its concerns relating to the CMP, the Agent of Change principle and the timing of the opening of the supermarket.
- 8.2 Construction Management Plan. A particular concern is the impact of construction traffic on the local residential and business communities. As an example, the excavation of the whole of the morrison's site would produce around 140,000 cu m of soil to remove from site which – using standard rigid tipper capacity of 15 cu m - would require over 9,000 such truck trips entering and leaving the site. The CMP speaks about 1320 trucks / month in the sub-structure phase, which would suggest that there would be 62 trucks every day for 7 months.
- 8.3 Another CMP matter is a concern is whether cranes and other tall vehicles would get under the rail bridge – and if not – then whether that would put pressure on the passageway at Gilbey's Yard permission for which would of course have to be given by One Housing Association.
- 9.3 Food Store. It is noted that the application seeks the ability for the food superstore to be open for 24 hours / fay. A condition of any consent should be that the food store should close at 11.00 pm. This is to avoid the prospect of nuisance to adjoining residential areas in the middle of the night.
- 9.4 Agent of Change. A condition of any new residential occupation is that new residential occupiers would be barred from complaining about disturbance from venues nearby if those venues were abiding by any pre-development sound limits or other anti-social customer management obligations that were in place to protect the existing residential population.
- 9.5 Infrastructure. The CGYWG is concerned whether the projected impact on infrastructure provision was realistic (e.g. health, education, open space), noting that the applicant suggests that the development is only going to require 0.7 of a doctor, and requires more evidence that the impact of the development is as described and that Camden will have set up the required facilities by the time the development is completed.