

12 October 2017

Delivered by email

Gavin Sexton
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Ref: 2017/3847/P

Dear Mr Sexton

CAMDEN GOODS YARD - SCHEME AMENDMENTS AND CLARIFICATIONS

PLANNING APPLICATION 2017/3847/P

Further to on-going discussions with the London Borough of Camden (LBC) regarding the above planning application and your letter dated 10 October 2017, and in response to feedback during public consultation on this application, I am pleased to submit amendments and clarifications to the pending application, in advance of a further period of public consultation.

These submissions also address the Greater London Authority (GLA) 'Stage 1' letter, dated 23 August 2017.

The following documents are submitted:

- Amended planning and landscaping drawings and landscaping statement, together with Design Development Notes, which sets out the changes proposed. The amended landscape statement includes further details regarding tree planting and green roof specification.
- Transport Assessment Addendum, incorporating comments in relation to the Construction Management Plan and Servicing Management Plan.
- Revised draft Framework Travel Plan.
- Response to Access Officer comments.
- Additional information in relation to sunlight and daylight.
- Revised solar glare assessment to account for proposed mitigation measures proposed to be incorporated into the design of the Chalk Farm Road building.
- Noise Assessment Addendum.
- Air Quality Neutral Assessment Addendum.
- Revised Flood Risk Assessment and response to London LBC comments regarding surface water drainage.
- Revised Construction Management Plan Pro-forma.

The Charlotte Building
17 Gresse Street
London
W1T 1QL

T 020 7851 4010 turley.co.uk

- Response to LBC drainage comments.
- Addendum to Sustainable Design and Construction Statement, incorporating Energy Statement Addendum, Thermal Comfort Assessment Addendum and Building Air Quality Neutral Assessment Addendum
- Revised Basement Impact Assessment and note on groundwater conditions

The above submissions respond in full to the points set out within your letter; however, I have summarised the revisions below. In addition, please find enclosed a letter from Ramboll setting out its consideration of the environmental implications of the amendments and clarifications.

In addition to the above documents an addendum to the Design and Access Statement (DAS) will be provided, with updated Computer Generated Images (CGIs). This addendum is still under preparation given the time required to produce the CGIs; however, the content is for explanatory and illustrative purposes and will precisely reflect the amendments set out within the submitted revised planning drawings.

ARCHITECTURAL AND URBAN DESIGN

The amendments to the planning drawings are summarised by the Design Development Notes produced by Allies and Morrison. These address detailed comments from LBC planning officers and comments set out by the GLA, including amendments to increase the activation of ground floor frontages and further design development with respect to Block E1.

TRANSPORT

In response to comments from LBC Highways and from Transport for London (TfL) and the GLA, there have been alterations to the proposed junction of the site access with Chalk Farm Road and various other changes set out within the updated transport documents and summarised below.

The Transport Assessment Addendum confirms:

- The retention of pay and display bays on Chalk Farm Road.
- Junction and wider highways detailed design revisions in accordance with advice from LBC.
- Reduction in proposed temporary foodstore parking (from 59 to 56) and accommodation of service vehicle movements on-site, together with information on the number of weekly deliveries and the management regime for this.
- Updated modelling and drawings.
- The cycle parking strategy, including block-by-block plans.
- The number electric vehicle charging points – 30 bays for the commercial parking (10% of total commercial provision) and 30 passive bays, and 4 active and 4 passive bays for the 20 residential (disabled) bays (20% in each case).

Note that the street crossing adjacent to Block A has not been relocated because the Road Safety Audit indicated that the proposed position is the most suitable in terms of pedestrian visibility and also because the position allows sufficient space for buses to manoeuvre in advance of the proposed raised table.

Also note that the originally submitted TA includes vehicle tracking within the site and this demonstrates that emergency service vehicle turning provision is adequate.

The revised draft Framework Travel Plan sets out revised proposals with regards to initiatives from the supermarket operator to proactively work towards a mode shift away from car use.

ACCESS

Comments already submitted in response to GLA Access Officer comments are re-provided for ease of reference. These address the topic of shared spaces and confirm the response to detailed design criteria for elements within the public realm.

Car parking proposals have been revised so that 18 of the 300 commercial bays will be disabled bays (6%) and a further 12 (4%) will be enlarged and adaptable in future as disabled bays if required. This is set out within the Transport Assessment Addendum and the response to GLA access comments.

The revised landscape proposals include more detail regarding the access strategy and pavement treatments, levels, grades and seating areas.

LANDSCAPING

With regards to tree planting, drawing ref. P10606-00-001-104 (within the Landscape Addendum to the DAS) indicates the planting locations and tree types proposed (including indicative species mix), together with details of planted and anticipated future stem girth.

The Landscape Addendum also sets out the location and extent of various roof treatments, including extensive green roofs. These extensive green roofs will include species rich planting and a varied substrate depth. Brown roofs will be planted with native endemic species to maximise biodiversity benefits.

The revisions to the detailed landscaping and public realm proposals respond to detailed comments from LBC including a consideration of the purpose and functionality of some of the 'yard' spaces within the proposed scheme. Southampton Square has been subject to further design development which introduces greater sub-division and clarity between different functions of the open space. Design development of Interchange Yard has been conceived to maximise the public benefits from this space and to better future-proof the scheme to facilitate connection with the wider Camden Goods Yard Framework area.

AMENITY

With regards to daylight and sunlight LBC has already been provided with more detailed information in the form of window diagrams and an updated solar glare assessment. These are re-provided within this submission for ease of reference.

The Noise Assessment Addendum confirms that a wide range of late-night activities were on-going during the period of the acoustic survey. The survey was undertaken in accordance with the scope agreed with LBC Environmental Health and is robust.

The Noise Assessment Addendum confirms that the application is acceptable with regards to the policy tests and the guidance set out in BS 8233:2014 regarding the noise environment for prospective occupiers of the proposed new homes. BS 8233:2014 is clear that a prescriptive approach to balconies is not always appropriate in urban areas, particularly where alternative access to quieter amenity space is provided and

it is noted that achieving levels of 55 dB LAeq,T or less may not be possible at the outer edge of sites in urban areas and adjoining the strategic transport network. BS 8233:2014 makes a distinction between traditional garden areas and balconies..

All proposed new homes which would be affected by the external noise environment on balcony spaces would have access to alternative amenity space in quieter locations; this is considered to be acceptable within an urban environment under the provisions of BS 8233:2014. Mitigation through the use of winter gardens would be effective but is not considered necessary, justified or proportionate in this instance. With regards to Policy A4 of the Local Plan it is considered that the availability of alternative amenity space is suitable mitigation to address noise exposure.

The Air Quality Neutral Assessment Addendum meets the requirements of an Air Quality Neutral Assessment including through consideration of roadside emissions, transport emissions from the proposal and dispersion modelling at various heights.

DRAINAGE AND FLOOD RISK

The Aecom response to LBC comments addresses the queries set out in your letter regarding run-off rates. The revised Flood Risk Assessment sets out proposed increased underground storage to achieve 3x greenfield run off, which is an improvement on the originally proposed 50% reduction. The provision of additional storage beyond this level would not be feasible given that the only additional location for further storage would be underneath the main site access road, which would have implications in terms of construction (including HS2 access requirements) and will be the route for the potential DEN connection pipes and utilities infrastructure. Therefore in accordance with Local Plan policy CC3 it is not feasible to provide a greater reduction in run-off rate from the site.

Additional information is also submitted in relation to the groundwater level at the site and this pertains to the Basement Impact Assessment, a revised version of which is submitted pursuant to feedback from LBC and Campbell Reith.

CONSTRUCTION MANAGEMENT

The Construction Management Pro-forma has been updated to reflect the comments in your letter and version 2.2 of the pro-forma has been used. The calculations for spoil estimates and the resultant estimated vehicle movements is provided. The revised pro-forma also sets out the practical considerations around the potential for rail and water transport during construction and demolition which, it clearly demonstrates, is not possible to achieve for this site.

SUSTAINABLE DESIGN

The Sustainable Design and Construction Statement Addendum, and appended documents, addresses the comments within you letter and comments from the GLA. Minor overheating issues affecting units F1-43 and F1-48 within the top of Block F have been effectively mitigated through decreased glazing. The Thermal Comfort Assessment has been updated to reflect this. Details of the gross roof area available for PV panels are also provided in Appendix A of the addendum.

In addition, as a result of discussions between the Greater London Authority, LBC and the applicant team, the energy strategy has been amended so that Air Source Heat Pumps are proposed instead of Combined Heat and Power, in addition to gas boilers (as per the submitted arrangements). This step has been taken in order to better support the delivery of the Kentish Town West DEN in accordance with policy CC1 of the Local Plan and London Plan policy 5.5.

Note that this ASHP-based energy strategy is set out for the purposes of re-consultation and is under review by the applicant subject to confirmation of the GLA's position. The applicant retains the right to continue with the originally proposed CHP solution, which has already been consulted on as part of the original application submission.

ADDITIONAL COMMENTS IN RESPONSE TO GLA STAGE 1 LETTER

As set out within the GLA letter, the GLA's current position is that *'the application does not yet comply with the London Plan, for the reasons set out in paragraph 76 of this report; but that the possible remedies set out in that paragraph could address these deficiencies'*. The following matters set out within paragraph 76 are addressed within this submission of revisions and clarifications:

- Urban design comments have been addressed in the amended drawings, as set out in the Design Development Notes.
- Inclusive design comments have been responded to, as detailed above.
- The Noise Assessment Addendum confirms the robustness of the submitted noise report and the noise survey which has been undertaken. It is also clear, with respect to external balconies, that the provisions of policy and the British Standard are met and therefore no issues arise with regards to the 'agent of change' principle.
- The addendum to the Sustainable Design and Construction Statement and its appended documents addresses overheating and renewable energy. The revised energy strategy, with ASHP, is designed to support the delivery of the Kentish Town West DEN.
- The proposed scheme will now have expanded underground drainage tank capacity which will result in a reduction in run-off to 3 x the greenfield rate from the site.
- The Air Quality Neutral Assessment Addendum responds to detailed comments from LBC and the GLA and meets the GLA requirements for an Air Quality Neutral Assessment.
- The proposed access on Chalk Farm Road has been revised in response to TfL/GLA and LBC comments and the car parking at the temporary store has been reduced, which also enables the accommodation of off-street servicing.

Following this productive period of assessment and subject to a further consultation period we look forward to presenting the application to the Planning Committee in due course. This significant application will make use of an underused yet highly accessible site within Camden Town Centre to bring forward much-needed homes, employment and community facilities. The scheme meets the applicant's vision for the site, endorsed by the London Borough of Camden, 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 site's distinctive past, that is respectful of neighbours and which optimises the potential to realise much needed local jobs, homes and shopping.'

Yours sincerely

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

Oliver Jefferson

Associate Director

oliver.jefferson@turley.co.uk