

MURPHY'S YARD

AN APPLICATION BY FOLGATE ESTATES LIMITED



PLANNING & REGENERATION STATEMENT

JUNE 2021

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LIMITED



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Murphy's Yard

PLANNING & REGENERATION STATEMENT

June 2021

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EXECUTIVE SUMMARY

This Planning and Regeneration Statement has been prepared by DP9 Ltd and is submitted in support of an outline planning application for Murphy's Yard. The outline planning application is made in relation to land to the south of Gordon House Road bounded by railway lines to the east, west and south, known as Murphy's Yard (the "Site"). The application is submitted on behalf of Folgate Estates Ltd ("the Applicant").

The Applicant is seeking to comprehensively redevelop the Site in a number of separate phases to provide a maximum of 95,000 sqm (GEA) of commercial uses including industrial, retail and leisure, office, research and development, healthcare, residential institution, community and sui generis floorspace along with a minimum of 750 (and up to 825) residential dwellings ("the Development"). The Development will also provide significant, high quality open space including a new route from Kentish Town to Gospel Oak known as the Heath Line, public realm and associated works.

The purpose of this Planning and Regeneration Statement is to assess the planning considerations associated with the Development in the context of national, regional and local planning policy and guidance. This Planning and Regeneration Statement will describe and analyse the wide-ranging planning benefits of the Development and demonstrate that it substantially accords with planning policy at all levels. In summary, the Development will deliver the following planning benefits:

- **Ensuring access to employment opportunities:** The proposals will deliver a significant amount of commercial floorspace including industrial uses, supporting business, delivering additional jobs, affordable workspace, warehouses and creative uses. The supporting Employment and Training Strategy prepared by the Applicant sets out the framework for the delivery of bespoke strategies and initiatives which aim to secure a range of quality employment and training opportunities which will be secured through the S106 Agreement.
- **Substantial new homes:** a minimum of 750 new homes with flexibility to increase to 825 to meet identified local need.
- **Significant high-quality public realm and open space:** the provision of 21,360 sqm new open space and a new multi-level 'Heath Line' connecting Kentish Town to Hampstead Heath, which represents a significant public realm offering informed by the ecology and character of Hampstead Heath.
- **The optimisation of site potential and density:** the Site benefits from a central location with good access to public transport and the Development will optimise the potential

of the Site to deliver a mixed-use neighbourhood with new homes, jobs and commercial and community floorspace in line with policy objectives.

- **Creating a vibrant, diverse and inclusive place:** The proposals seek to create a new employment-led, mixed-use neighbourhood which complements the surrounding communities and neighbourhood, securing regeneration benefits for all, not just new residents.
- **A mixed and balanced community:** the Development will offer a range of affordable housing products and a mix of unit sizes at a range of price points for people of different incomes and needs.
- **A commitment to delivering affordable housing:** The Development Proposals will commit to maximising the provision of affordable housing delivered across the Site in all residential phases.
- **Securing high quality, sustainable design:** The Design Code and Parameter Plans will secure high-quality design of the proposed buildings and landscape. The illustrative masterplan demonstrates a clear intent to deliver an exemplary, high-quality development with a unique sense of place and character.
- **Encouraging healthy and active lifestyles:** the clear network and hierarchy of routes and spaces seek to protease and encourage walking and cycling and the diverse mix of public spaces and activities will create a stimulating place to encourage participation and foster enjoyment. The potential for new health facilities will also support the needs of the community.
- **Embraces the Site's heritage:** The masterplan seeks to create an area rich and varied in character of its own, which stiches into surrounding neighbourhoods and celebrates its local and historic context through the retention, reuse and adaptation of existing locally listed locomotive sheds at the heart of the Site.
- **Sustainability and green infrastructure** – Creation of a sustainable neighbourhood that is exemplary in terms of zero carbon emissions and its adaptability and resilience to climate change and maximises connections to existing and new green infrastructure.
- **Connectivity** – opening up the Site, which is currently cut off from surrounding areas by railway lines on three sides and limited access points and future-proofing opportunities for potential connections with Kentish Town, Regis Road and Carkers Lane.

- **Murphy/Folgate Legacy** - J. Murphy & Sons Limited plan to decant their industrial uses and remain in their current headquarters adjacent the Site assuming long-term stewardship of the Site to ensure the vision for the site is implemented and maintained.

It is estimated that the Development will also generate the following tangible, wider benefits:

- Job generation throughout a long build programme and ultimately as part of the ongoing operation of the site providing up to c. 3,610 new jobs in the operational stage.
- Economic benefits arising from new local spend, business rates and council tax.
- Provision for a minimum of 300 sqm floorspace for community uses.
- Provision for 3,000 sqm of affordable workspace for local businesses.
- Community Infrastructure Levy (CIL) payments to the Mayor of London and London Borough of Camden are estimated at circa £38m subject to the ultimate mix of land uses coming forward.

The Development has been subject to extensive pre-application discussions with London Borough of Camden ("LBC") Officers and the Greater London Authority ("GLA") as well as key local stakeholders who have shaped the development proposals. The Proposed Development has sought to rationalise and balance the extensive and sometimes competing priorities of these groups, the result of which is a locally grounded proposal to transform the Murphy's Yard site into a new sustainable location for commercial and residential floorspace in an employment-led mixed-use scheme of exceptional design quality.

1. INTRODUCTION

- 1.1. This Planning and Regeneration Statement has been prepared by DP9 Ltd and is submitted in support of an outline planning application for the redevelopment of land to the south of Gordon House Road bounded by railway lines to the east, west and south, known as Murphy's Yard (the "Site"). A Site Location Plan is included at Appendix 1.
- 1.2. The application is submitted on behalf of Folgate Estates Ltd ("The Applicant"). Folgate Estates Limited owns the freehold of the 6.23 ha site from which its sister company, J Murphy & Sons Limited, a global multi-disciplined engineering and construction company who deliver infrastructure, operates. The Site is adjacent to their office headquarters and contains office and industrial uses, open yard space and parking.
- 1.3. The planning application seeks permission for:

"Outline planning permission with all matters reserved for the demolition of existing buildings and structures and redevelopment to be carried out in phases (with each phase being an independent act of development) comprising the following mix of uses: residential (Use Class C3), residential institution (Use Class C2), industrial (Use Class B2 and/or B8), commercial floorspace (Class E), flexible commercial and Sui Generis floorspace (Use Class E and/or Sui Generis Use), Community (F1 and/or F2), Sui Generis, and cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements, and all associated works."
- 1.4. The vision for Murphy's Yard is one of a characterful, playful and accommodating place for all; seeking to link existing communities through the provision of exceptional public realm, community space, workspace and a significant number of new homes.
- 1.5. A full description of the Development is contained in the Development Specification, which accompanies this application. A summary description of the Development is contained in Chapter 3 of this statement.
- 1.6. The purpose of this Planning and Regeneration Statement is to assess the planning considerations associated with the Development in the context of national, regional and local planning policy and guidance. The Planning Statement comprises the following:
 - Chapter 2: Site and Surroundings
 - Chapter 3: The Development
 - Chapter 4: Consultation Process
 - Chapter 5: Planning Policy Framework Overview

- Chapter 6: Assessment of the Development
- Chapter 7: Regeneration Statement
- Chapter 8: Phasing and Implementation
- Chapter 9: Planning Obligations and S106
- Chapter 10: Benefits
- Chapter 11: Conclusions

- 1.7. This statement should be read and considered in conjunction with a number of planning application documents, as set out in Appendix 2 of this statement.
- 1.8. Due to the nature of the Development, an Environmental Impact Assessment has been formally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

2. SITE AND SURROUNDINGS

The Site

- 2.1. The Site is located a short distance west of Kentish Town Tube and Overland Station and Town Centre, within the administrative boundary of the London Borough of Camden.
- 2.2. The planning application boundary is defined on Parameter Plan 001 'Application Site Boundary' and attached at Appendix 1.
- 2.3. The Site is 6.23 hectares in total, to the west of Highgate Road and is bound to the north, west and south by railway lines. The northern part of the site borders Gordon House Road and lies opposite Hampstead Heath. It is a predominately a landlocked/back-land site with access restricted to three entrances at Gordon House Road to the north and Sanderson Close and Greenwood Place to the east. The international headquarters of J. Murphy & Sons Limited lies directly adjacent to the application boundary to the east, accessed via Sanderson Close.
- 2.4. The Site currently contains general and light industrial uses with ancillary office space, open yard space and vehicle parking, with portacabins, sheds and other miscellaneous structures. There are two, large locomotive sheds at the heart of the Site.
- 2.5. Having operated from the Site for 57 years, J Murphy & Sons Limited is currently in the process moving its industrial operations to an alternative site located in Hemel Hempstead in order to better service their national operations and facilitate development of the site.
- 2.6. The Grade II listed O2 Forum Kentish Town is also within the Applicant's ownership and utilises the Greenwood Place access. The venue and its servicing yard to rear are not included in the application Site. The Applicant has also recently acquired the 'Car Wash Site' at 369-377 Kentish Town Road following the grant of permission for its redevelopment in March 2020 (see below for more information). This site is also excluded from the application Site boundary.
- 2.7. There are significant level changes across the Site, rising from the Midland Mainline in the south. Much of the southern part of the site is over a storey below the buildings on Highgate Road.
- 2.8. Table 1 below sets out the existing floor areas across the Site, comprising general industrial uses within classes E(g)(iii), B2 and B8 with ancillary office.

Table 1: Existing Buildings

Existing Building	GIA	GEA
Shed 2	4,733	5,002
Shed 3	6,176	6,696
Workshops and Offices	3,838	3,959
Building Q	2,649	2,748
Thames Water	727	735
Training Centre	105	140
Security Gate	74	92
Total	18,303	19,373

- 2.9. The Site is a designated industrial site within the Kentish Town Industrial Area and is considered a Locally Significant Industrial Site (LSIS) within the London Plan.
- 2.10. Furthermore, the Site is proposed as a draft site allocation within LBC's emerging Site Allocations Document for comprehensive employment-led redevelopment that provides a mix of uses including industry and other employment uses, permanent self-contained homes, open space, and community facilities (draft Site Allocation Reference KT3). The Site Allocations Document is still at draft stage and has not been considered at Examination and so carries limited weight at this stage as it does not form part of the adopted Development Plan.

The Surrounding Area

- 2.11. The land uses surrounding the Site are predominantly residential to the north, on or near Gordon House Road. There are a mix of commercial and residential uses along Highgate Road to the east including the residential properties of Sanderson Close which shares one of the accesses to the Site, the Highgate Road Business Area, a key employment site, and the Greenwood Centre. Further residential uses lie to the west of the Site at Gospel Oak and the Regis Road Growth Area to the south, allocated for comprehensive employment-led redevelopment that provides a mix of uses, including industry, logistics, and other employment uses, permanent self-contained homes, open space, and community facilities.
- 2.12. Whilst the Site comprises brownfield industrial land it is surrounded by a number of green designated Open Spaces, Local Green Spaces and Sites of Importance for Nature Conservation. The Site is to the south of Hampstead Heath, comprising circa 300 hectares of designated Metropolitan Open Land and Green Space.

- 2.13. Kentish Town City Farm, a four-acre charity farm that helps people connect with animals and nature and provides important educational programmes is also located to the east of the Site (beyond the railway line).
- 2.14. In addition, there are a number of new developments planned in the area which include:
- The redevelopment of the 'Car Wash' site at 369-377 Kentish Town Road for the erection of a part 6 part 7 storey building plus basement to provide 14 flats at first floor and above and retail or restaurant use at ground and basement level incorporating widened pavement to Kentish Town Road (ref: 2019/0910/P) dated 12th March 2020. As noted above, this site was recently acquired by the Applicant but excluded from the application Site boundary.
 - The 7.4 ha Regis Road site to the south of the Site is allocated under the Draft Site Allocations Document (Draft Policy KT2) for a comprehensive employment-led redevelopment as part of the wider regeneration of Kentish Town. Regis Road is identified to have an indicative housing capacity of 1,000 units alongside employment uses and is to come forward to be compatible with and facilitate the redevelopment of Murphy's Yard as part of a shared vision for the area. Timescales for its delivery is unknown at this stage as no planning application has been submitted to date, albeit it is "*likely to take some time*" according to the Draft Site Allocations Document.

Heritage Context

- 2.15. The Site does not lie within a designated Conservation Area, although Dartmouth Park Conservation Area lies to the east and north, the Mansfield Conservation Area to the west and Kentish Town Conservation Area to the east. The Parkhill and Upper Park, Bartholomew Estate, West Kentish Town and Inkerman Conservation Areas also lie further afield.
- 2.16. A 'Protected Corridor' and 'Peripheral Corridor' designated under the Kentish Town Neighbourhood Plan ("KTNP") crosses the middle of the Site to Parliament Hill from the area adjacent to Kentish Town Station.
- 2.17. There are no statutory listed buildings located on site. A number of Grade II listed buildings are located within close proximity to the site's eastern boundary along Highgate Road, including the O2 Forum and Christ Apostolic Church where the road joins Greenwood Place.
- 2.18. Furthermore, the two locomotive sheds at the heart of the Site ("Shed 2" and "Shed 3") are of historic interest and locally listed in addition to the Murphy HQ which is excluded from the application boundary.

Accessibility

Public Transport

- 2.19. The Site is well served by public transport and has a varied PTAL rating from 2 in the western part to 5 in the eastern part near Sanderson Close. The Site is a short distance from both Zone 2 Gospel Oak and Kentish Town stations to the north and south. Gospel Oak Station, directly adjacent to the Site's northern boundary along Gordon House Road has London Overground services with direct lines to Richmond, Clapham, Barking and Stratford. Kentish Town, to the south of the site along Kentish Town Road is a London Underground and National Rail station served by the High Barnet branch of the London Underground Northern line and Thameslink trains on the National Rail Line to Luton, West Hampstead, Sutton (via Wimbledon) and St Albans. Other nearby London Underground stations within walking distance of the site include Tufnell Park (600m), Belsize Park (1.4km) and Chalk Farm (1.5km). The latter two stations are located on the Edgware branch of the Northern Line.
- 2.20. Gordon House Road to the north and Highgate Road to the east are also served by a number of bus routes running from Archway through Hampstead Heath to Brent Cross; and from Highgate to Clapham or Moorgate, respectively.
- 2.21. Both Zipcar and Enterprise operate within the vicinity of the site with a number of locations within a short distance along Gordon House Road, Highgate Road and Fortress Road.

Walking and Cycling

- 2.22. Several walking routes connect the site to the local area, including paths to and through Hampstead Heath directly adjacent to the site. The existing Site presents a barrier to pedestrian movement, with no through routes.
- 2.23. The Site is within 15 minutes' cycling time of Regent's Park and a number of central London stations and destinations around Kings Cross and Euston to the south; Primrose Hill, St John's Wood and South and West Hampstead to the west; Hampstead Heath, Hampstead, Highgate Wood and Highgate to the north and Holloway, Stroud Green and Finsbury Park to the east.
- 2.24. Transport for London ("TfL") Cycleway 6 (C6), a popular commuter and safer-cycling route in London, runs from Kentish Town to Elephant & Castle in the south, via central London. TfL Cycleway 9 is accessible via the A5202 Royal College Street, approximately 800m south of Greenwood Place

- 2.25. LBC's Cycling Action Plan sets out the existing cycle network and the long-term vision (by 2041) for improvements and sets out a long-term vision for Kentish Town Road to be extended as a "Primary Route" up to Highgate Road running adjacent to Hampstead Heath, by making the existing route safer and more accessible for cyclists.
- 2.26. TfL's London Cycle Hire scheme does not yet include Kentish Town and Site's surrounds. The nearest docking station can be found to the south of Kentish Town Road at Camden Town, circa 1.5km from the Site.

Local Highway Network

- 2.27. Kentish Town Road is a London Distributor Road and forms part of the strategic road network. Highgate Road and Gordon House Road are Borough Distributor Roads.
- 2.28. The Site is located approximately 2km west of the A1, which connects to the A406, A501 (which forms a ring road around Central London) and A503. The M1 is located approximately 8km from the M2, which is accessible via the A1 and the A406.

Planning History

- 2.29. There is an extensive planning history at the Site spanning several decades of ownership. A summary of the key applications relevant to this planning application is provided in the Table 2 below.

Table 2: Planning History

Reference	Development Description	Date
2013/8082/P	Erection of a single storey extension at ground floor level to offices (Class B1a).	Grant 24-02-14
F11/1X/B/33421	Revisions to layout and revised elevational treatment as an amendment to the planning permission granted by letter dated 11th June 1981 (rog.No.32156) for change of use of the building at the north-west corner of the site from general industrial to office purposes.	Conditional 01-02-1982
32546	Use of part of the site as indicated on the submitted plans as a transfer station for builders' refuse.	Limited Permission 02-10-1981
F11/1X/B/32156	Change of use of the building at the North-west corner of the site from general industrial to office purposes.	Conditional 11-06-81
27521	The retention of a 2,000-gallon Derv storage tank for a further limited period.	Limited Period 28-02-1979

27520	The retention of a single storey office building and the continued use of the site as a constructional engineer's plant yard for a further limited period.	Limited Period 27-11-1978
25345	The retention of a single storey office building and a 2,000-gallon Dry storage tank, and the continued use of the site as a constructional engineer's plant yard for a further limited period.	Conditional 03-11-1977
20507	The retention of a single storey office building and continued use of the site as a constructional engineers plant yard for a further limited period.	Limited Period 13-06-1975
20168	The erection of a demountable asbestos building for use as a vehicle maintenance workshop and the installation of storage tanks for fuel oil.	Refuse 22-05-1975
19687	The erection and retention for a limited period of a demountable wooden building for use as a rest room.	Limited Permission 24-01-1975
22970	The retention of a single storey office building and a 2,000 gallon Derv storage tank, and the continued use of the site as a constructional engineer's plant yard for a further limited period.	Limited Period 30-09-1976
20508	The retention of a 2000 gallon fuel oil storage tank for a further limited period.	Limited Period 13-06-1975
13392	The retention for a further limited period of a demountable building for use as an office in conjunction with the Gospel Oak Coal Yard, Gordon House Road, N.W.5.	Limited Permission 01-06-1972
F11/1X/B/5425	Use of site for the storage, batching and mixing of cement and aggregates for manufacture of "ready-sixed" concrete and the erection of plant and equipment in connection therewith at Kentish Town Railway Land, Highgate Road, Camden.	Grant 11-12-1968
E10/9/A/2545	The erection and retention for a limited period of a demountable building for use as an office in connection with the Gospel Oak Coal Yard, Gordon House Road, Camden.	Conditional 30-09-1966
1040	Installation of 2,000 gallon storage tank 10'9" x 6'0" on site at Gospel Oak Goods Yard, Camden as shown outlined in blue on plan submitted and its retention for a limited period.	Conditional 11-11-1965
F11/1X/D/555	Use of site at Gospel Oak Goods Yard, Camden, as shown outlined on plan submitted, as a constructional engineer's plant yard and the erection of a single storey office building for a limited period, and the installation of a 1000 gallon DERV tank.	Conditional 07-07-1965

TP74462/19348	Erection of a structure for use as a gas pumping plant, for a limited period of 42 years	Permission 19-08-1964
TP/103494/6305	The use of Locomotive sheds Nos. 1, 2 and 3 Motive Power Depot, Kentish Town (off Highgate Road) St. Pancras, as a contractors plant depot.	Permission 06-05-1964
TP68583/979	The erection and retention of an office and amenity block on a site in the Gospel Oak Goods Yard, Gordon House Road, St. Pancras, in connection with the use of the site and existing buildings as a constructional engineer's plant yard and workshops.	refusal 23-02-1965
TP74462/15585	The erection of an additional floor comprising ancillary office accommodation at the Gospel Oak Goods Depot, St. Pancras.	Conditional 10-01-1963
TP7446/17290	The use of a site in Gospel Oak Goods Yard, St. Pancras, as a civil engineering contractor's depot and the erection and retention of two single storey buildings for use as a pre-casting shed and offices in connection therewith.	Permission 07-01-1955

3. THE DEVELOPMENT

Description of Development

3.1. The application takes the form of an outline planning application, with all matters reserved ("Outline Proposals").

3.2. Planning permission is sought for the following:

“Outline planning permission with all matters reserved for the demolition of existing buildings and structures and redevelopment to be carried out in phases (with each phase being an independent act of development) comprising the following mix of uses: residential (Use Class C3), residential institution (Use Class C2), industrial (Use Class B2 and/or B8), commercial floorspace (Class E), flexible commercial and Sui Generis floorspace (Use Class E and/or Sui Generis Use), Community (F1 and/or F2), Sui Generis, and cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements, and all associated works.”

3.3. The application seeks approval of the parameters for the Outline Proposals. The parameters for the Outline Proposals are detailed within the Development Specification, the Parameter Plans and the Design Code (together the 'Control Documents'). The Control Documents will be secured and conditioned in any planning permission to control and guide the quantum of development and design work over the various phases of the scheme delivery and form the foundation for future reserved matters applications ('RMAs').

3.4. The application seeks to reserve all matters for the Outline Proposals, however, a sufficient level of detail has been provided in accordance with the Town and Country Planning (Development Management Procedure) Order 2015 and Planning Practice Guidance (PPG) Paragraph 006 Reference 14-006-20140306. Matters for future determination are:

- 'Access' – the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.
- 'Appearance' – the aspects of a building or place within the Development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.

- *'Landscaping'* – the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes: (a) screening by fences, walls or other means; (b) the planting of trees, hedges, shrubs or grass; (c) the formation of banks, terraces or other earthworks; (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features.
- *'Layout'* – the way in which buildings, routes and open spaces within the Development are provided, situated and orientated in relation to each other and to buildings and spaces outside the Development.
- *'Scale'* – the height, width and length of each building proposed within the Development in relation to its surroundings.

3.5. Whilst all details of access are reserved for subsequent approval, areas where access points to the development will be situated are shown by the red triangles on Parameter Plan 8 and are submitted for approval pursuant to Article 5(3) of the Town and Country Planning (Development Management Procedure)(England) Order 2015 ("DMPO"). All other aspects of "access" as defined by Article 2(1) of the DMPO are reserved for subsequent approval.

The Need for Flexibility

3.6. The form of the application reflects the nature of the scheme. The Development comprises a true mix of uses which will be built out over a prolonged period of time and will encounter market fluctuations, full economic cycles and demand pressures. The need for flexibility is therefore paramount to allow the Development to respond to changing needs and patterns as future phases come forward for development.

Amount

3.7. The application seeks planning permission for a maximum of 95,000 sqm GEA non-residential floorspace and a maximum of 825 homes. Table 3 defines the maximum floorspace for each proposed land use (in GEA sqm). The sum of floorspace of the individual land uses exceeds the maximum GEA cap for the Outline Proposals because there is an allowance for swings between land uses to allow flexibility for different uses to come forward. The amount of floorspace that could come forward is therefore controlled by a maximum GEA cap by land use and for the Development as a whole. This has been arrived at following extensive testing by the Applicant and Design Team and is justified in the documents supporting the planning application.

Table 3: Outline Development Areas by Land Use (sqm GEA)

Land Use	Minimum	Maximum
Residential (C3)	750 homes	825 homes
Residential (C3) floorspace	-	78,410 (excluding ancillary areas) ¹ 85,200 (including ancillary areas) ¹
Residential institution (C2)	-	8,000
Office (E(g)(i))	-	34,500
General Industrial and/or Storage and Distribution (B2 and/or B8)	40,461 ²	8,150
Light industry (E(g)(iii))	Comprised of: -4,418 sqm B2/B8 minimum	36,043
Research and development (E(g)(ii))	-14,955 E(g)(iii) minimum -21,088 sqm of any of B2/B8/E(g)(ii)/E(g)(iii)	36,000
Healthcare (E(e)) and/or sui generis ³	-	16,000
Retail and/or commercial (E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis ⁴)	700	3,650
Flexible mixed-use space ⁵	1,300	1,500
Community (F1 and/or F2)	300	1,300
Minimum floorspace (excluding residential C3)		42,761 sqm
Non-residential cap		95,000 sqm⁶
¹ Ancillary areas include car park, plant, BOH, refuse and bike store.		
² A minimum of 40,461 sqm of industrial/research and development uses will come forward. Beyond the minimum provision of 4,418 sqm B2/B8 and 14,955 sqm light industrial (E(g)(iii)), the remaining floorspace can be either B2, B8, E(g)(ii), or E(g)(iii).		
³ To the extent that such uses are not principally for visiting members of the public and so do not fall within these use classes, sui generis use is sought.		
⁴ Sui generis uses to include those uses at paragraph 6(p)-(r) of the UCO including (p) as a public house, wine bar, or drinking establishment, (q) as a drinking establishment with expanded food provision, (r) as a hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises. to the extent that Class E(d) uses are not principally for visiting members of the public and so do not fall within these use classes, sui generis use is sought.		
⁵ Uses to include those uses within classes (E(a), E(b), E(d), E(g)(iii), F1, F2, those uses at paragraph 6(p)-(u) of the UCO including (p) as a public house, wine bar, or drinking establishment, (q) as a drinking establishment with expanded food provision, (r) as a hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises, (s) as a venue for live music performance, (t) a cinema, (u) a concert hall. to the extent that Class E(d) uses are not principally for visiting members of the public and so do not fall within these use classes, sui generis use is sought.		
⁶ The total non-residential development must not exceed 95,000 sqm. This area is inclusive of plant, car parking, and other ancillary spaces.		

Minimum Delivery

- 3.8. The Applicant is committing to deliver a minimum amount of floorspace to ensure that the aspirations for the Site are met and the Development results in a successful and vibrant

new neighbourhood. On this basis, the following minimum areas will be secured once the Development been completed:

- 750 residential dwellings including affordable housing;
- 40,461 sqm of industrial uses, comprised of:
 - 4,418 sqm GEA of General Industrial and/or Storage and Distribution (B2 and/or B8);
 - 14,955 sqm GEA of Light Industrial ((E(g)(iii));
 - 21,088 sqm GEA of either General Industrial and/or Storage and Distribution (B2/B8), Light Industrial ((E(g)(iii)), Research and Development (E(g)(ii)), subject to the individual caps on each of those uses;
- 300 sqm GEA of Community (F1/F2) uses;
- 1,300 sqm GEA of flexible mixed use space (to include those uses with classes (E(a), E(b), E(d), E(g)(iii), F1, F2, and those uses at paragraph 6(p)-(u) of the UCO including (p) as a public house, wine bar, or drinking establishment, (q) as a drinking establishment with expanded food provision, (r) as a hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises, (s) as a venue for live music performance, (t) a cinema, (u) a concert hall. To the extent that Class E(d) uses are not principally for visiting members of the public and so do not fall within these use classes, sui generis use is sought.

Height and Massing

3.9. The proposed heights vary across the site with the tallest building proposed at 113.45 AOD. Heights in the illustrative masterplan range from 1 to 19 storeys, promoting visual interest and in consideration of a range of local and strategic views as well as the key view from Kentish Town Station to Parliament Hill. Further information can be found in the supporting Townscape and Heritage Visual Impact Assessment (THVIA) prepared by Peter Stewart Consultancy and the DAS by SEW.

3.10. Parameter Plan 13 (Building Heights Plan) illustrates the maximum building heights proposed for the Outline Proposals and summarised in Table 4 below.

Table 4: Proposed Maximum Plot Heights

Plot	Maximum height AOD
A	+44.70m
B	+44.70m
C	+64.30m

F	+72.09m
G	+79.40m
H	+79.40m
I	+75.35m
J	+113.45m (+55.85m, +107.05m)
K	+94.45m (+88.05m, +56.05m, +52.85m)
L	+84.85m (+78.45m, +56.05m, +52.85m)
M	+77.65m
O	+70.45m
P	+56.00m
Q	+82.25m
S	+97.35m
Shed 2	+54.16m
Shed 3	+68.89m

3.11. As set out in the Design and Access Statement prepared by SEW, the heights have been devised to ensure that the Development is optimised whilst respecting each plot's context.

Proposed Masterplan Land Uses

3.12. The proposed mix of uses described in this section and as proposed in the Development Specification has been developed following a rigorous options testing and the proposed quantum of floorspace within each land use category reflects the optimum balance required to facilitate and create a genuinely mixed-use neighbourhood that has sufficient critical mass of employment floorspace to support a diverse business base.

Residential

3.13. The Outline Proposals seek permission for a maximum of 825 dwellings within Use Class C3 distributed across Plots C, J, S, K, L, M, O, P and Q. The number of residential units and the mix to be delivered through the Development will be established at the reserved matters stage. It is envisaged c. 3,120 sqm (GEA) equivalent to 30 units will come forward in the first phase of the development at Plot C.

3.14. The Development will provide a mix of housing types including studio, 1, 2, 3 and 4-bed units. A unit mix for the Development is set out in paragraph 6.5.12 of this Statement and the Development Specification sets the target site-wide residential mix that will come forward through the RMA stage. The location and tenure split of the affordable units in the Development phases will also be established at the RMA stage subject to the controls set out within this application, namely:

- unit mix guidelines for both market and affordable dwellings;
- a target minimum of 35% affordable housing across the masterplan (as proposed and subject to the assumptions set out at Section 6.4 of this statement and the accompanying Housing and Affordable Housing Statement for further detail);
- tenure split within the affordable provision of 60% social rented and 35% intermediate.

Industrial

3.15. The Proposals seek permission for a maximum of 44,193 sqm GEA of industrial uses including B2, B8, E(g)(ii) and E(g)(iii) across the masterplan. A minimum of 4,418 sqm of B2 and/or B8 uses and 14,955 sqm of E(g)(iii) light industrial uses will be provided, which amounts to a re-provision of the existing uses/quanta on the site (a total of 19,373 sqm GEA). The remaining industrial floorspace up to the maximum will be provided in either B2, B8, E(g)(ii) or E(g)(iii) uses (or a mix thereof) (subject to the individual caps on each).

Retail, Commercial and Sui Generis

3.16. The Outline Proposals seek permission for a minimum of 700sqm and up to 3,650 sqm GEA of retail/commercial (Classes E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis). These uses are expected to come forward at the ground floor level of various plots across the site and provide small comparison shops and other small commercial uses to primarily service the residential dwellings.

3.17. Furthermore, the Outline Proposals seek permission for a minimum of 1,300 sqm and maximum of 1,500 sqm GEA of flexible mixed-use space to be located on the ground floor of Shed 2 to include uses within classes E(a) and/or E(b) and/or E(d) and/or E(g)(iii) and/or F1 and/or F2, as well as sui generis uses as specified in paragraph 3.7 above. This provision will form a retail, leisure and cultural hub on the Site.

Office

3.18. A maximum of 34,500 sqm of office use E(g)(i) is proposed for Plot F, Shed 2 and Shed 3. It is envisaged that this office floorspace will largely provide space for small and medium sized enterprises (SMEs) in flexible floorplates that allow for adaptation as businesses evolve. Controls on this floorspace are proposed to ensure that it provides an appropriate quantum of SME floorspace.

Research and Development

3.19. Up to 36,000 sqm of research and development floorspace (E(g(ii))) is proposed, of which 21,088 sqm could come forward as part of the industrial provision. This land use could come forward in Plots G and H.

Healthcare

3.20. The Outline Proposals seek permission for a maximum of 16,000 GEA of Healthcare (E(e) or sui generis) use primarily within Plot I. Provision is also made for smaller health facilities such as GP surgeries to come forward at the ground level plots throughout the masterplan.

Residential institution

3.21. The Outline Proposals seek permission for up to 8,000 sqm GEA of residential institution (Use Class C2) which could come forward in Plot I.

Community

3.22. The Outline Proposals seek permission for a minimum of 300 sqm and up to 1,300 sqm GEA of Community (F1 and/or F2) uses. As mentioned above, the minimum of 700sqm retail/commercial floorspace is proposed for (E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis uses which could provide for uses such as a day nursery or creche, in addition to a gym or indoor recreation uses identified by the Community Use Survey (refer to the supporting SCI for further information).

Open Space and Child Play space

3.23. In addition to the built floorspace set out above, the Outline Proposals will include areas of open space, many of which collectively create the Heath Line as shown on Parameter Plan 07 (Character Areas Plan). Across the Site the open space will allow for 21,360 sqm, provided across a series of key open spaces. These key open spaces are listed in Table 5 below and are indicatively shown on Parameter Plan 07.

Table 5: Open Spaces

Character Area	Open Space	Minimum Size (sqm)
Gospel Oak Gate	Gordon Gate	500
	Heath Street North	1,500

Murphy's Mews	Heath Street South	2,700
Heath Cliff	The Heath Cliff	2,600
	The Arches	500
	The Platform	600
Engine Depot	Sanderson's Gate	2,900
	The Depot	980
	Maker's Yard	900
	The Arcade	900
Murphy's Yard	Murphy's Yard	2,900
	Upper Sidings	2,200
Kentish Town	Greenwood Gate	400
Gateway	Lower Sidings	580
	The Landing	1,200

- 3.24. The Development will provide play space calculated in line with the Mayor's "Shaping Neighbourhoods: Play and Informal Recreation" SPG and will meet this demand through the provision of a variety of different play environments throughout the masterplan. The Design and Access Statement and Design Code provide further details on the location and form of these areas within the Development.

Parking

- 3.25. A Site-Wide Framework Travel Plan has been submitted in support of the Application. This document sets out a strategy for promoting sustainable modes of transport during the life of the Development and reducing the reliance on car use in the future. The provision of car parking in the Development will be reviewed in accordance with the site-wide Travel Plan and opportunities taken to minimise the provision of car parking as the Development evolves.
- 3.26. The Development will provide disabled and operational car parking only in accordance with the standards set out in Table 6.

Table 6: Car Parking Standards

Land Use	Disabled parking provision	Maximum operational parking numbers
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Residential (C3)	3% of residential units	0
Residential institution (C2)	1 space per plot which contains this use	0
Office E(g)(i)	1 space per plot which contains this use	0
General Industrial and/or Storage and Distribution (B2 and/or B8)	1 space per plot which contains this use	For occupiers of units < 1,000sqm (GIA) – 1 space For occupiers of units > 1,000sqm (GIA) – 1 space per 1,000sqm (or part thereof) occupied
Light industry (E(g)(iii))	1 space per plot which contains this use	
Research and development (E(g)(ii))	1 space per plot which contains this use	
Healthcare (E(e))	10	4 spaces for patient transport/operational parking
Retail/commercial (E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis)	1 space per plot which contains this use	0
Flexible Mixed-Use space	1 space per plot which contains this use	0
Community (F1 and/or F2)	1 space per plot which contains this use	0

- 3.27. All disabled and operational car parking spaces will be provided with electric charging points.
- 3.28. Car parking and cycle parking for the Proposed Development will be provided in accordance with the standards set out above and as enshrined within the Development Specification and will be confirmed at RMA stage.

Access

- 3.29. Pedestrian and cycle access points into the Site will be provided from Gordon House Road, Sanderson Close and Greenwood Place.
- 3.30. In terms of vehicular access, Sanderson Close will be used to access Plots within the southern section of the site which will predominantly accommodate employment uses. The access onto Greenwood Place will be closed to vehicles, except for emergency access.
- 3.31. A new vehicle access in the form of a priority junction will be created on Gordon House Road. This new access will be used to serve the northern section of the site which accommodates the majority of the residential units. Occasional operational access points for Network Rail and Cadent Gas are also incorporated into the proposals.

Plots C and F and Sheds 2 and 3

- 3.32. Although the entirety of this application is submitted in outline with all matters reserved, a significant amount of work has been undertaken to progress the designs of Plots C and F and Sheds 2 and 3 commensurate with their significance to the masterplan: Plots C and F comprise proposed Phase 1 of the Development and the Sheds occupy a primary position within the centre of the Site and are key to the placemaking vision for the entire masterplan.

Plot C

- 3.33. Plot C is expected to provide residential use with ancillary retail/commercial uses at ground floor to be brought forward along with Plot F in Phase 1 of the Development.
- 3.34. A total of 30 affordable residential units are expected to be delivered on Plot C within the Intermediate Rent tenure and London Living Rent ("LLR") levels. No market dwellings are proposed to be delivered in the first phase.
- 3.35. The indicative residential mix of Plot C is as follows:

Table 7: Indicative Plot C residential mix

	1B 1P	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total
Units	0	19	4	7	0	0	30
%	0	63.3%	13.3%	23.3%	0	0	

- 3.36. The seven storey 'Gatehouse' building will be located in the Kentish Town Gate Character Area to the south, marking the entrance to the Site from Greenwood Place and has

commercial space at ground floor level encouraging people to explore the Site and Heath Line.

- 3.37. An illustrative layout and architectural principles for Plot C can be found in the supporting DAS. It is envisaged that the building will reference the proportions of the neighbouring proposed warehouse quarter with a gridded context and red brick tone.

Plot F

- 3.38. Plot F is expected to provide general industrial and/or storage and distribution, office and retail use to be brought forward along with Plot C in Phase 1 of the Development.
- 3.39. Together with Plot C, the seven storey Plot F 'Office Gateway Building' will form a pair of gateway buildings addressing the arrival to the Site and Heath Line from Kentish Town and Greenwood Place.
- 3.40. An illustrative layout and architectural principles for Plot F can be found in the supporting DAS. It is envisaged that the building will incorporate prominent corners to establish the building as a landmark or gateway to the southern entrance and contrasting brick tones to complement the existing warehouse context.

Sheds 2 and 3

- 3.41. Shed 2 will provide light industrial, office and sui generis uses to be delivered alongside Shed 3 in Phase 3 of the Development.
- 3.42. Shed 3 will also provide light industrial and office uses to be delivered in Phase 3 of the Development.
- 3.43. Located at the heart of the Site, the historic fabric of the locally listed locomotive sheds and industrial character will be retained and celebrated as part of the proposals with a new rooftop extension.
- 3.44. An illustrative layout and architectural principles for Shed 2 (and Shed 3) can be found in the supporting DAS. In summary, the rooftop extension will be read as a single volume and reflect the shed's existing distinctive roofline to create a legible landmark. The articulation of massing framing key routes will draw people into the buildings and vertical fenestration with infill panels making reference to the existing shed fenestration treatment.

Infrastructure Initiatives

3.45. A number of infrastructure initiatives are being discussed between the Applicant and the LBC. These infrastructure initiatives seek to add connections and additional the connectivity and accessibility across this part of Camden and include the following:

1. A bridge link from the south-eastern part of the site to Kentish Town Road.
 - This could provide a new access point into the Site providing a direct connection between Kentish Town Road and the Site via a new bridge link adjacent the existing Midland Mainline railway line. From Kentish Town Road it would be accessed by a new entry point to the south of the site adjacent to 369-377 Kentish Town Road (known as the "Car Wash Site"). The link could connect to Murphy's Yard at its southeasternmost tip (south of the O2 Forum service yard).
 - The new link could be provided for pedestrians and cyclists only
 - Parameter Plan 09 (Access and Circulation Plan) identifies a "safeguarded zone for potential upper level future pedestrian and cycle zone" and a "pedestrian and cycle route only". A "potential future site access" is also denoted where the site boundary meets this safeguarded location. Timescales for the delivery of any bridge are not yet known and will be subject to discussions on funding, land assembly and an operational agreement with Network Rail.
 - The potential bridge link to Kentish Town is also outside the Applicant's ownership and cannot be delivered without securing the necessary rights over Network Rail's operational land. The bridge link is not necessary to make the Proposed Development acceptable in planning terms and could if LBC wishes be delivered through CIL funding in due course. Its inclusion now, however, could stymie or significantly and unnecessarily delay delivery of the Murphy's Yard scheme.
2. A bridge link from the south/western boundary of the site to Regis Road.
 - This could provide a new access point into the Site providing a direct connection between the Site and the Regis Road site to the south over the existing Midland Mainline railway line.
 - Parameter Plan 09 (Access and Circulation Plan) identifies the location safeguarded for the potential bridge landing and denotes this area as a "safeguarded zone for potential upper level future pedestrian and cycle zone" and a "pedestrian and cycle route only"). A "potential future site access" is also denoted where the site boundary meets this safeguarded location.

- Network Rail access could be retained to the west of the safeguarded area as also illustrated on Parameter Plan 09.
- The new link could be provided for pedestrians and cyclists only.
- Timescales for the delivery of this bridge are not yet known and will be subject to the progress of redevelopment at the Regis Road development area funding and land assembly.
- Development at the Regis Road site is entirely outside of the control of the applicant and so any potential bridge crossing to this area cannot be either designed or committed to until such time as the owners of that site are prepared to consider a coordinated approach to bringing the bridge forward as part of wider Development Proposals at that site. This will also require detailed discussions with and agreement from Network Rail from an operational perspective. Therefore, no works are proposed on this bridge as part of the application so there is no reason for the red line to extend to this area.

3.46. The Development of the Murphy's Yard site has, however, been designed so that it will not prejudice the future delivery of a bridge crossing in due course but its delivery at this stage is not necessary to make the proposed Murphy's Yard Development acceptable in planning terms. Indeed, given the considerable uncertainty over the feasibility and nature of the potential link a requirement for its inclusion could stymie the Murphy's Yard scheme or at the very least significantly and unnecessarily delay the planning process and the delivery of the major regeneration benefits it will bring. If in due course LBC wishes to utilise CIL monies to deliver this element of infrastructure FE would be supportive and is happy to discuss the strategy to achieve this in due course with LBC. These initiatives are located outside of the planning application boundary and are not proposed as part of the planning application on the basis that they are not required to make the comprehensive Development of the Site acceptable in planning terms. However, the Proposed Development would preserve an opportunity to facilitate the delivery of these aspirations and has safeguarded locations within the Site to connect to them if and when they are delivered.

3.47. In addition to the above, additional works to the surrounding highway network have been identified which would improve the surrounding area. These include:

1. Sanderson Close upgrades to the boundary and highway including improvements to the footpath, site entrance, road and wall adjoining the site.
2. Improved accessibility and permeability via a new vehicle access on Gordon House Road and relocated pedestrian crossing, including:

- New access to the Site and closure of the existing access to vehicles.
- Relocation of the pedestrian crossing on Gordon House Road westwards from its current location and provide primary pedestrian and cycle access into the Site from the north from a new location to the west of the railway bridge.

These upgrades could improve the movement into and out of the site and make this access point more legible for all users, and safer for pedestrians and cyclists. This access will provide the Site's northern entrance to the Heath Line and serve as the main access point for pedestrians and cyclists coming to and from Hampstead Heath through the Site.

3. Upgrades to Greenwood Place, including widening the footway, reducing the carriageway and improving/introducing landscaping. These upgrades would improve the carriage and footways serving the Site's southernmost access point, which will also serve as the Site's main entrance from Kentish Town and access to the Heath Line (subject to the delivery of the bridge between the Site and Kentish Town Road).

3.48. It is anticipated that these works will be secured via a S278 agreement with LBC with full details being provided alongside the relevant RMA.

4. CONSULTATION PROCESS

- 4.1 The Applicant has been committed to engaging with the local community on the emerging proposals for the Site and engaged extensively with residents and stakeholders in tandem with pre-application discussions with LBC. Throughout the process, the Applicant received a wide variety of feedback from local people and has sought to take on board comments where possible and to provide explanation and responses to local residents on key issues such as height, scale, massing, affordable housing, sustainability of the scheme, green connections through the site and impact on the viewing corridor from Kentish Town.
- 4.2 The Statement of Community Involvement (SCI) prepared by Kanda explains all public consultation carried out during the pre-application stage, together with an explanation of the approach to consultation that will continue through the determination of the planning application. The DAS prepared by SEW also sets out the key stages in the design Development of the Site since the outset of the design development.
- 4.3 This section provides a detailed description of the statutory consultation process undertaken, including the pre-application process with LBC, the GLA, TfL, and other consultees. It also summarises the public consultation exercise set out in detail in the SCI.

EIA Scoping Request

- 4.4 Due to the nature of the Development, an Environmental Impact Assessment has been formally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Scoping Opinion was requested from the Council on 11th December 2020 (reference: 2020/5774/P). A further addendum to this Scoping Request was issued to LBC on 21 April 2021.
- 4.5 A Scoping Opinion has not been received from the London Borough of Camden at the time of the submission of the planning application in June 2021. Scoping consultation responses from statutory consultees were however obtained via the London Borough of Camden planning portal and have been considered throughout the ES as necessary.

Pre-Application Meetings

Mayoral Referral

- 4.6 The application is referable to the GLA as it exceeds the relevant thresholds set out in The Town and Country Planning (Mayor of London) Order 2008. Accordingly, the GLA and TfL

have been involved in formal pre-application discussions with the Applicant and LBC from an early stage with ongoing pre-application discussions.

Camden Pre-Application Meetings

- 4.7 An extensive programme of regular pre-application meetings has been held with LBC Planning, Design and Technical Officers on the evolving masterplan since 2018. This programme has focussed on establishing the key masterplan principles for the Site from the outset and then working through more technical and detailed points over several years to refine the scheme and proposals presented.
- 4.8 The proposals have also benefitted from further consultation opportunities offered by LBC including Developer's Briefings in September and December 2020, and presentations to the Strategic Panel in July 2019 and December 2020.
- 4.9 The Masterplan was also presented to the Design Review Panel (DRP) organised by Frame Projects on 2nd April 2020 and 4th September 2020. The panel was comprised of 5 members of varying experience and expertise including conservation, heritage, urban regeneration, master planning, climate change, design codes and design guides, public realm and architecture. Further details can be found within the accompanying Design and Access Statement prepared by Studio Egret West.

Representations to Planning Policy

- 4.10 The Applicant has engaged in consultation exercises for a number of emerging Local Planning policy documents including the Draft Camden Site Allocations Document and recently adopted Kentish Town Planning Framework ("KTPF"). Representations were also made to the Kentish Town Neighbourhood Plan and Dartmouth Park Neighbourhood Plan. The Applicant will continue to engage on the next consultation stages on the Site Allocations Document to seek to ensure that it reflects the Development and approach to delivery now proposed by the planning application. Its initial representations were submitted before the preparation of the current application and therefore it is likely that additional representations will be needed to reflect the evolution of the scheme since the original representations were made.

Community Consultation

- 4.11 From the first public exhibition held in July 2019, the consultation process has informed the design team of local community objectives, aspirations and expectations. At the subsequent stages, the feedback from the consultation events has been integral to the design process and has helped the Applicant and the design team develop their vision for the masterplan.

- 4.12 The consultation process included meetings with local community groups, residents and political stakeholders. In order to make these consultation events as accessible as possible, they were held in locations close to the application site and arrange of online and offline tools employed to maximise engagement during the Covid-19 pandemic.
- 4.13 Meetings were held with the following local stakeholders:
- Kentish Town Neighbourhood Forum
 - Dartmouth Park Neighbourhood Forum
 - Kentish Town City Farm
 - Camden Disability Action (Greenwood Centre)
 - Gospel Oak Jobs Hub
 - Camden Community Makers
 - Kentish Town Road Area Action
- 4.14 A wide range of themes have emerged throughout the consultation process, including:
- Recognition that the site is suitable for comprehensive, mixed-use redevelopment.
 - Key issues arising from the density of the Development including transport impacts and provision of infrastructure.
 - Broad support for the provision of affordable housing.
 - The importance of respecting the KTPF viewing corridor as well as protected and strategic views.
 - Support for maximising biodiversity measures.
 - Support for the provision of a new landscaped route from Kentish Town to Gospel Oak (known as the Heath Line).
 - Request for the provision of community facilities to meet the needs of local residents.
 - Support for increased connectivity through the Site and new links to surrounding area.
- 4.15 Full details of the consultation process, the outputs, feedback and extent to which it informed the Development is included in the SCI which is submitted as a separate document. The Applicant will continue to engage proactively with the community throughout the future stages of the Development.

5. PLANNING POLICY FRAMEWORK OVERVIEW

- 5.1. The purpose of this Chapter is to identify the key national, regional and local planning policy and guidance relevant to the determination of the application for the Development, and against which the proposals have had regard to during design development. An analysis of the key policies and tests is included in the relevant sections.
- 5.2. 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.
- 5.3. The Development Plan for the Site comprises the following:
- The London Plan (March 2021)
 - Camden Local Plan (July 2017)
 - Camden Site Allocations Document (September 2013)
- 5.4. It should be noted that these Development Plan documents were prepared before the recent changes to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 20201 coming into force. Planning policies referenced in this Statement therefore refer to the use classes within the policy wording and should be read/applied as if they refer to the applicable updated classification.
- 5.5. In addition to the Development Plan, regard has been had to the following key planning policy documents and guidance:
- **National Planning Policy and Guidance:**
 - National Planning Policy Framework (“NPPF”) (February 2019)
 - Planning Practice Guidance (“PPG”)
 - **Neighbourhood Plans:**
 - Kentish Town Neighbourhood Plan (September 2016)
 - Dartmouth Park Neighbourhood Plan (March 2020)
 - **Regional Supplementary Planning Documents and Guidance (GLA):**
 - Affordable Housing & Viability (August 2017)
 - Crossrail Funding (March 2016)
 - Housing (March 2016)
 - Social Infrastructure (May 2015)
 - Accessible London: Achieving an Inclusive Environment (October 2014)

- The control of dust and emissions during construction and demolition (July 2014)
- Character and Context (June 2014)
- Preparing Borough Tree and Woodland Strategies (February 2013)
- Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)
- Play and Informal Recreation (September 2012)
- All London Green Grid (March 2012)
- London View Management Framework (“LVMF”) (March 2012)
- London's Foundations (March 2012)
- London World Heritage Sites (March 2012)
- Planning for Equality and Diversity in London (October 2007)
- Draft Good Quality Homes for all Londoners (October 2020)
- Draft Circular Economy Statements SPG (October 2020)
- Draft Whole-life Carbon Assessments SPG (October 2020)
- Draft ‘Be Seen’ Energy Monitoring Guidance SPG (October 2020)
- **Local Supplementary Planning Documents and Guidance (Camden Council)**
 - Kentish Town Planning Framework (2020)
 - Access for All CPG (March 2019)
 - Air Quality CPG (January 2021)
 - Amenity CPG (January 2021)
 - Biodiversity CPG (March 2018)
 - Design CPG (January 2021)
 - Developer Contribution CPG (March 2019)
 - Employment sites and business premises CPG (January 2021)
 - Energy efficiency and adaptation CPG (January 2021)
 - Planning for health and wellbeing CPG (January 2021)
 - Public open space CPG (January 2021)
 - Transport CPG (January 2021)
 - Trees CPG (March 2019)
 - Water and flooding CPG (March 2019)

5.6. The Development has also had regard to various relevant GLA and LBC strategies and guidance documents, which although do not form part of the Development Plan against which the Development is assessed, have been taken into consideration where relevant.

Emerging Policies

5.7. LBC are currently in the process of reviewing the Camden Sites Allocations Document adopted in 2013. One round of consultation took place on the draft Site Allocations Document between 13 February and 27 March 2020 and it is understood that there will be a further consultation before the plan is finalised and issued to the Secretary of State for review. As stated above the Applicant will be making further representations on certain elements of the draft which currently carries only limited weight due to the stage reached in its preparation and the need for further consultation and its independent examination.

Site Designations

5.8. The Site has the following policy designations at a regional and local level:

- Industry Area under the LBC Local Plan;
- Locally Significant Industrial Site (LSIS) under the London Plan;
- Draft Policy K1 'Kentish Town Area' under the Draft Site Allocations Document;
- Draft Site Allocation KT3 under the Draft Site Allocations Document;
- A 'Protected Corridor' and 'Peripheral Corridor' under the KTNP; Kentish Town Potential Development Area under the KTNP.

5.9. The Site is located in the proximity of areas with the following designations:

- Open Spaces;
- Site of Importance for Nature Conservation (SINC) Borough Grade I;
- Habitat Corridors;
- Kentish Town Regis Road Growth Area;
- Dartmouth Park Conservation Area;
- Neighbourhood Centre (Highgate Road);
- Site Allocation 39: 19-37 Highgate Road, Former Lensham House and 25-37 Greenwood Place; and
- Areas with made Neighbourhood Plan (Kentish Town and Dartmouth Park Neighbourhood Forums).

6. ASSESSMENT OF THE DEVELOPMENT

6.1. Introduction

6.1.1. This Chapter assesses the Development in the context of key national, regional and local planning policy and guidance relevant to the determination of the application.

6.2. Principle of Development

Policy Context

6.2.1. The principle of the redevelopment of the Site to deliver a high-density mix of uses is supported by planning policy at all levels. Key considerations from all levels of policy are set out below.

National Planning Policy

6.2.2. The NPPF sets out three overarching economic, environmental and social objectives to achieve sustainable development and how these are expected to be applied.

6.2.3. Paragraph 11 outlines that for decision-taking, local authorities should apply a presumption in favour of sustainable development by:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- I. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

6.2.4. Chapter 5 of the NPPF supports the delivery of a sufficient supply of homes. Paragraph

59 recognises the importance *“that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”* to meet the Government’s objective of significantly boosting housing supply.

- 6.2.5. Chapter 6 seeks to build a strong, competitive economy through decisions that help *“create the conditions in which businesses can invest, expand and adapt”* and for Britain to be a global leader in driving innovation in line with the Government’s Industrial Strategy which sets out a vision to drive productivity improvements across the UK.
- 6.2.6. Chapter 11 promotes the effective use of land in meeting the need for homes and other uses. Paragraph 118 gives *“substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs”*. Furthermore, Paragraph 119 encourages Local Planning Authorities (“LPAs”) to take a *“proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership”*.

Regional Planning Policy

- 6.2.7. Policy GG2 of the London Plan encourages making the best use of land, including enabling the development of brownfield land and proactively exploring the potential to intensify the use of land for homes and workspaces by higher density development on well-connected sites.
- 6.2.8. Policy GG5 seeks to conserve and enhance London’s global economic competitiveness through planning for sufficient employment and industrial space, high-quality and affordable housing and physical and social infrastructure to support London’s growth, amongst other objectives.
- 6.2.9. To ensure that Boroughs achieve their housing targets, Policy H1 requires development plans to allocate sites suitable for residential and mixed-use development. Part 2 encourages plans and decisions to optimise the potential for housing on all suitable and available brownfield sites, especially on well-connected sites and identified industrial sites, amongst other criteria.

6.2.10. Policy E4 seeks to maintain and enhance industrial land and premises for varying operational requirements across London and on designated Industrial Sites including Locally Significant Industrial Sites (LSIS) such as Murphy's Yard. Any release of industrial land to achieve wider planning objectives is required to be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 and focussed in well-connected locations.

Local Planning Policy

6.2.11. Policy G1 of the LBC Local Plan sets out that *"The Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough"*. To achieve this the council seeks to secure high-quality development and promote the most efficient use of land and buildings in Camden. Part f of Policy G1 identifies Kentish Town as a highly accessible location where the most significant growth is expected to be delivered.

6.2.12. Supporting paragraphs 2.12 and 2.13 recognise the provision of an appropriate mix of uses *"can also contribute to successfully promoting future growth in Camden and making efficient use of its limited land"* in support of mixed-use developments.

6.2.13. The Site is proposed as a draft site allocation under the new Site Allocations Document for comprehensive employment-led redevelopment that provides a mix of uses including industry and other employment uses, permanent self-contained homes, open space, and community facilities (Draft Site Allocation Reference KT3). Part B of Policy KT3 encourages a mix of uses to come forward stating that the development must *"Use efficient design to allow intensification and co-location of employment uses with a significant amount of housing and with other proposed use"*.

6.2.14. Furthermore, Paragraph 8.41 of the draft Site Allocations Document outlines that *"Given the existing industrial designation of the site, a higher density redevelopment scheme for solely industrial and warehousing uses (in use classes B1 (b), B1(c), B2 and B8 and sui generis uses of a similar nature) would be in accordance with the Camden Local Plan and London Plan. However, this is not the Council's preferred approach as it would not maximise the significant benefits that a mixed-use scheme would deliver for the area, the borough and local residents, and would not reflect community aspirations as set out in the two neighbourhood plans"*.

- 6.2.15. As well as aiming to maximise the supply of housing at Policy H1, Policy E1 seeks to secure a strong and successful economy through supporting business of all sizes, including LBC's industries by safeguarding existing employment sites and the Kentish Town Industry Area.
- 6.2.16. The KTNP recognises the potential for a mixed-use development on Site whilst retaining, and where possible increasing, the level of industrial floorspace and employment opportunities at Policy SP2, including small business and office floorspace.
- 6.2.17. The KTPF supports employment led development that achieves higher densities in a format that allows for co-location of uses including industry, light industry, proportion of food, drink and retail, and cultural and entertainment uses. Specifically, the KTPF identifies that the Site is *"suitable for consolidation of industry which will allow for its co-location with other priority uses, in particular housing. It is anticipated that the Murphy site could deliver in the region of 750 homes, although this will be dependent on a number of factors"*.
- 6.2.18. The DPNP *"sees the site as an opportunity to enhance the Dartmouth Park area with a sensitively designed scheme for a mix of residential and business/employment units"*.

Assessment of the Development

- 6.2.19. The proposals involve the regeneration of an existing, well-connected brownfield site for an employment-led mixed-use Development which will create a number of social, economic and environmental benefits in line with all levels of planning policy.
- 6.2.20. The existing quantum of industrial floorspace will be re-provided on Site in classes E(g(iii)), B2 and B8 as existing, as a minimum, resulting in no net loss of industrial land in accordance with London Plan Policy E4.
- 6.2.21. The masterplan will also provide a further 21,088 sqm of industrial floorspace (totalling 40,461 sqm as a minimum), within classes B2, B8, E(g)(ii) or E(g)(iii) (or a mix thereof). This floorspace can come forward in a combination of these uses but each individual use is subject to a maximum cap as set out in the Development Specification. The minimum figure of these uses is roughly equivalent to 65% of the

Site's plot ratio, as outlined as follows:

- Existing site area (within the red line shown on Parameter Plan 001): 62,288 sqm
- 65% of the site area: 40,487 sqm

6.2.22. The minimum industrial provision marginally falls short of the 65% plot ratio by 26 sqm, but it should be noted that the red line boundary includes areas of the Site not within the Applicant's ownership for access arrangements, which should not be taken into account of when determining the plot ratio. Furthermore, the maximum industrial cap allows for 44,193 sqm of B2, B8, E(g)(ii) and E(g)(iii) uses, which far exceeds the 65% plot ratio figure.

6.2.23. The proposals make provision for a significant uplift in commercial floorspace on the Site in addition to the industrial and research and development uses, which are subject to maximum caps as set out within the Development Specification.

6.2.24. The proposals allow for an uplift of employment floorspace on Site up to a maximum cap of 95,000 sqm, including retail, healthcare, office and research and development floorspace which is currently not available on Site. Together with the increase in industrial floorspace this represents approximately a significant increase in the amount of employment floorspace on the Site should the maximum areas be brought forward. This significant provision of employment floorspace and re-provision of industrial floorspace will help contribute towards and preserve building a strong and competitive economy at local, strategic and national level in line with the Government's Industrial Strategy to drive productivity improvements across the UK and the policy objectives of the NPPF.

6.2.25. The various proposed commercial uses will complement each other and help form a business community on the Site with interlinkages and potentially leading to wider economic benefits in the future. The mix of commercial uses will also have placemaking benefits through maximise ground floor activation throughout the site to enliven the pedestrian experience and create vibrancy and activity.

6.2.26. In accordance with the aspirations of the Local Plan and the Site's Draft Allocation, the delivery of a mix of other uses alongside industry on Site will also make for the most efficient use of the limited land in the Borough and is LBC's preferred approach for its redevelopment and set out in the Kentish Town Planning Framework. This is

echoed in Policy E7 of the London Plan which encourages any release of industrial land to achieve wider planning objectives through intensification, co-location and substitution and be considered as part of a plan-led process or as part of a co-ordinated masterplanning process. The delivery of up to 825 dwellings, a wide range of other employment uses and creation of significant open space alongside the industrial re-provision achieves this.

6.2.27. The optimisation of this underutilised brownfield Site, identified for development and in an area for significant growth, will therefore make a significant contribution to a range of borough-wide and strategic objectives of maximising the development potential of sites in sustainable locations, including significantly boosting housing supply whilst safeguarding the existing employment site.

6.2.28. The redevelopment of the Site will also act as a catalyst for wider regenerative effects in the local area and Borough, creating *“conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden’s identified needs and harness the benefits for those who live and work in the borough”* in accordance with the objectives of the Local Plan. Further explanation relating to the regeneration and planning benefits are set out in the Regeneration Statement at Chapter 7 of this document.

Principle of Development – Summary

- All levels of planning policy support the regeneration of a well-connected brownfield site in an area designated for growth.
- The proposals will re-provide and increase industrial floorspace on Site protecting and enhancing its industrial heritage.
- Alongside retaining and enhancing industrial floorspace the Site will be optimised to deliver a mix of other uses including much needed homes and other types of employment floorspace.
- The redevelopment will create conditions for wider regenerative effects in the local area and borough (refer also to the Regeneration Statement at Section 7).
- The need for the redevelopment of the Site is recognised in key local planning policy documents including the KTNP and DPNP.

6.3. Site Suitability and Land Use

NON-RESIDENTIAL USES

1) INDUSTRY

Policy Context

National Policy

- 6.3.1. The NPPF sets out a presumption in favour of retaining and enhancing industrial land uses in line with the Government's Industrial Strategy to drive productivity improvements across the UK.

Regional Policy

- 6.3.2. London Plan Policy E4 requires designated industrial sites such as Murphy's Yard to maintain and enhance industrial land and premises for varying operational requirements to meet current and future demands, taking into account strategic and local employment land reviews. Part A sets out the following land uses, but not exhaustive to, that contribute toward the provision of land for industry needs:

- light and general industry (Use Classes B1c and B2);
- storage and logistics/distribution (Use Class B8) including last mile distribution;
- flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population;
- low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Providing suitable business space);
- research and development of industrial and related products or processes (falling within Use Class B1b).

- 6.3.3. Policy E6 goes on to state that development plans "*should make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses*" on LSIS.

- 6.3.4. Policy E7 encourages the "*intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:*

- 1) *introduction of small units*
- 2) *development of multi-storey schemes*
- 3) *addition of basements*
- 4) *more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating*

impacts on the transport network where necessary.”

Local Planning Policy

- 6.3.5. The LBC Local Plan seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth.
- 6.3.6. The Local Plan defines “business” and employment” as the following range of uses:
- *“offices, research and development and light industry (Use Class B1);*
 - *general industrial uses (Use Class B2);*
 - *storage and distribution (warehousing) (Use Class B8); and*
 - *other unclassified uses of similar nature to those above, such as depots or building merchants (classed as Sui Generis).”*
- 6.3.7. To create conditions for economic growth Policy E1 seeks to maintain and enhance its stock of businesses of all sizes. Part G specifically relates to supporting Camden’s industries by safeguarding existing employment sites and the Kentish Town Industry Area and supporting their intensification where they provide additional employment and benefits.
- 6.3.8. LBC’s Employment Sites and Business Premises CPG provides further guidance in relation to Policy E1 and the Kentish Town Industrial area, stating at paragraph 30 that they will consider higher intensity redevelopment proposals for employment uses for “B1(c) light industrial, B2 industrial, B8 storage and distribution purposes, and sui generis uses of similar nature” as part of comprehensive schemes including housing provided they do not compromise the successful operation of businesses in the area.
- 6.3.9. Similarly, Policy E2 protects *“sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents” and those that support the local economy. Higher intensity development of sites suitable for such use will be considered provided that:*
- a) the level of employment floorspace is increased or at least maintained;*
 - b) the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;*
 - c) it is demonstrated to the Council’s satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden’s local economy and will be to a sustainable location;*

- d) *the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;*
- e) *the scheme would increase employment opportunities for local residents, including training and apprenticeships;*
- f) *the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and*
- g) *for larger employment sites, any redevelopment is part of a comprehensive scheme."*

6.3.10. Paragraph 5.28 of the Local Plan summarises the findings of the 2014 Employment Study which provides context for this planning policy position, stating that *"the cost of industrial locations in Camden is high, indicating that supply does not meet demand. There has been pressure to redevelop the borough's stock of land used for employment purposes, particularly manufacturing and industry, for higher value uses, principally housing. Once an industrial or warehousing use is developed for an alternative use it is unlikely that it will be returned to such use"*.

6.3.11. Paragraph 5.30 goes on to state that *"Premises suitable for industrial, manufacturing and warehousing businesses provide jobs for people who would otherwise be at relatively high risk of being unemployed. The Camden Employment Study 2008 found that the skills required for these sectors are fundamentally different from other sectors with similar qualification level requirements, such as retail, leisure and hospitality. Therefore, it is unlikely that the retail or hospitality sectors will provide a straightforward alternative job opportunity for people losing industrial/ warehousing jobs in the borough"*.

6.3.12. Draft Site Allocation KT3 allocates the Site for comprehensive employment-led redevelopment that provides a mix of uses including industry. Part a of Policy KT3 specifically sets out that development must *"intensify industrial provision to deliver an increase, or at least no overall net loss, of industrial, storage and warehousing capacity, and provide for other high-density employment uses reflecting existing local business clusters and Camden's growth sectors"*.

6.3.13. Paragraph 8.43 outlines the Council wants to see *"high-quality, modern, flexible employment spaces"* brought forward on site which *"contribute to the continued success of existing business clusters, including light manufacturing and the creative and knowledge sectors, and maintain, and where possible expand, the area's role in providing for businesses supporting London's Central Activities Zone (CAZ)"*.

6.3.14. Section 3.2.1 of the KTPF sets out that the Council will expect redevelopment on the Site to *“Retain the existing quantum of industrial floorspace (B1c, B2, B8 and sui generis of a similar nature), but re-provided in a more efficient and sustainable format that allows for intensification and co-location of industrial and other uses”*. Additionally, Section 3.2.1 sets out expectations for land uses for developments in the framework area, including, but not limited to, the following industrial uses:

- *“efficient and sustainable industrial floorspace that achieves higher densities in a format that allows for co-location of uses (use classes B1c, B2, B8 and sui generis of a similar nature);*
- *‘last mile’ storage and logistics/ distribution and ‘just in time’ servicing,*
- *Grow the existing cluster of creative, cultural and tech industries, with additional light industrial space (B1c)”*.

6.3.15. Furthermore, the KTPF recognises that *“the proportion and type of industrial uses, particularly those requiring large articulated lorries or high frequency vehicle movements will need to be limited and given careful consideration”* such as their impact on sensitive nearby uses and the road network. In favour of industrial floorspace weighted towards lighter industry.

6.3.16. This position is echoed in the KTNP, where Policy S2 seeks to *“retain and where possible increase the level of industrial floorspace and employment opportunities including the growth of small and start-up businesses”*.

Assessment of the Development

6.3.17. Although the precise mix of the industrial floorspace will be determined through further discussions and market assessment and formalised through the Reserved Matters process a minimum quantum of B2 and/or B8 and E(g)(iii) uses will be provided as set out in the Development Specification. Permission is sought for the re-provision of the Site's existing quantum industrial uses in line with the strategic LSIS and local industrial designations and wider local and strategic policy requirements. The proposals also seek an intensified industrial offer in addition to the re-provision to meet future demand and provide jobs for local people and support LBC's existing business clusters and growth sectors. This approach is also in accordance with the Site's Draft Allocation KT3 and Government's Industrial Strategy.

6.3.18. A minimum of 40,461 sqm of industrial floorspace (made up of General Industrial and/or Storage and Distribution (B2 and/or B8), Light Industry (E(g)(iii)) and Research and Development (E(g)(ii))) floorspace will come forward as a result of the

development, amounting to 65% of the Site's plot ratio (as explained in paragraph 6.2.22 above). It is envisaged that c. 5,100 sqm of industrial floorspace will come forward in the first phase. The re-provided industrial floorspace will increase the quantum of B2/B8 floorspace and result in no loss of on-site industrial floorspace and capacity. Additionally, J Murphy & Sons Limited will continue to operate on Site throughout the construction of Phase 1, allowing for the ongoing industrial functioning of the Site whilst the development is being brought forward.

6.3.19. The accompanying Commercial Strategy sets out a vision for how this floorspace could come forward as the Development progresses. It explains how light industrial floorspace will contribute to the creation of a vibrant business community on the Site and can meet the needs of general industrial users that operate with lesser environmental impact, such as vehicle repair/maintenance facilities, but is increasingly being taken up, especially in Central London, by small to medium sized enterprises and start-up companies seeking flexible commercial space.

6.3.20. It is anticipated that some of the industrial floorspace will come forward as part of stacked industry offer in warehouse style buildings. The ambition of the stacked industry concept is to intensify industrial floorspace and make efficient use of land to provide industrial floorspace. By providing industrial space over multiple levels, this prevents sprawl of industrial areas whilst contributing to an adequate supply of industrial space. It is anticipated that Plots G and H could come forward as stacked industry buildings. Stacked industry is a relatively new concept in London and the design of this building typology would aim to provide simple unrestricted floorplates, be flexible to accommodate a range of different uses, be economically efficient, have direct and coherent loading strategies and be sympathetically designed to its surroundings.

6.3.21. The KTPF recognises that whilst an element of B2 and B8 industrial uses could be supported on the Site, lighter industrial uses which would result in lesser environmental impacts would be more suitable. The Development will provide a significant quantum of light industrial floorspace that will meet the needs of light industrial occupiers and will allow for flexible floorspace within this use to enable the workspaces to come forward in a variety of sizes to meet the needs of occupiers and support their development as their business grows. This provision would support an employment cluster that encourages collaboration and allow the occupiers to generate activity that can enliven the Site and surrounding area and contribute to a vibrant public realm.

6.3.22. The provision of general industrial and storage floorspace will diversify the industrial

floorspace and is supported by all levels of planning policy.

6.3.23. London Plan Policy E4 specifically identifies research and development (formerly use B1b, now E(g(ii))) as a suitable use to contribute towards the provision of land for industry. The research and development floorspace is intended to support the medical technology and e-health sectors as well as absorb some of the growth in the Knowledge Quarter uses that are being priced out of Euston and Kings Cross, whilst being in close proximity to the Royal Free and UCH. Both are teaching hospitals and specifically research and science-based organisations that could complement and benefit from the other commercial uses.

6.3.24. The proposals are therefore considered in compliance with national, regional and local planning policies, safeguarding existing industrial and employment sites whilst making a significant contribution in a prime location which will have wider economic benefits at all levels including employment opportunities and supporting London's CAZ.

6.3.25. In summary, the provision of a mix of industrial uses within the Development will accord with the relevant local, strategic and national policies, including the strategic and local industrial designations.

Principle of Industrial Floorspace – Summary

- The Site remains a designated LSIS location where industrial floorspace is expected to be retained and enhanced.
- Retention and re-provision of industrial floorspace on Site (up to 65% of the plot ratio) respects its industrial heritage and meets local and regional policy through providing an intensified offer.
- Continued use of existing industrial operations throughout the build out of the first phase, retaining the existing use on site for as long as possible whilst the new industrial floorspace is built.
- The proposed industrial floorspace will meet an identified need for these uses in the borough and London.
- The industrial floorspace will enable and retain a wide range of jobs for local people, in accordance with local planning policies.
- Provision of light industrial floorspace will cater for an identified need for a range of sizes and types of businesses and to make the Site a more sensitive neighbour and respond to local context.

2) RESEARCH AND DEVELOPMENT

Policy Context

National Policy

6.3.26. Chapter 6 of the NPPF sets out a presumption in favour of creating conditions to help build a strong, competitive economy and for Britain to be a global leader in driving innovation in line with the Government's Industrial Strategy which sets out a vision to drive productivity improvements across the UK.

6.3.27. Paragraph 82 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors including knowledge, data-driven, creative or technology industries at a variety of scale and in suitably accessible locations.

Regional Policy

6.3.28. Policy E4 of the London Plan looks to provide a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions including research and development.

6.3.29. The London Plan supports businesses and employment across all sectors. Policy E8 supports specifically innovation and London's role as a location for research and development.

6.3.30. The Mayor has identified a number of sector-specific business opportunities as outlined at paragraph 6.8.3 of the London Plan, including creative industries and life sciences. The London Plan seeks to support networks and facilities that support London's role as a centre of medical excellence. As such, Development Plans are required to support the range of existing and proposed medical and life sciences research districts associated with 'MedCity' such as those around the Euston Road, in LBC. The London Plan identifies that there is particular demand for affordable 'grow-on' space (including laboratory space) in this sector.

Local Policy

6.3.31. Local Plan policies E1 and E2 promote employment uses in the borough, including

research and development premises.

- 6.3.32. As stated in Local Plan policy E1 and in paragraph 5.46, the Kentish Town Industry Area will be safeguarded by resisting any proposals which jeopardise the continued use of sites for various industrial uses including research and development of products or processes.

Assessment of the Development

- 6.3.33. A maximum of 36,000 sqm of research and development floorspace (E(g(ii))) is proposed on Site and has the potential to form a key part of the industrial floorspace provision in line with London Plan Policy E4 which specifically identifies it as a contributing use. The proposed research and development use will enable important facilities for enterprise to come forward in the future in support innovation and contribute towards London's role as a location for research and development in line with London Plan Policy E8.
- 6.3.34. The research and development floorspace is intended to support the medical technology and e-health sectors as well as absorb some of the growth in the Knowledge Quarter uses that are being priced out of Euston and Kings Cross, whilst being in close proximity to the Royal Free and UCH. Both are teaching hospitals and specifically research and science-based organisations that could complement and benefit from the other on-site commercial uses. Research and development floorspace will accommodate these sectors which are identified by the Mayor of London as growth opportunities that should be supported, and which contribute towards London's role as a centre of medical and technological excellence.
- 6.3.35. The delivery of research and development floorspace will contribute to the significant increase in employment opportunities in the borough with wider social and economic benefits in accordance with Local Plan objectives and the Kentish Town Industry Area strategy to retain such uses in the area.
- 6.3.36. The provision of research and development floorspace alongside industrial spaces will be attractive to businesses who seek to co-locate the research and development arm of their business with the manufacturing/production space. The proximity of research and development and industrial spaces can allow for more fluid sharing of information between the two sectors and provide access to production processes for teams working in research and development. This opportunity will be attractive to businesses that currently have their manufacturing and research and development operations working in silo and would like to consolidate their operations. The stacked

industry format will also facilitate co-location of research and development and more traditional industrial uses.

6.3.37. Research and development floorspace can also accommodate dedicated laboratory spaces which cannot easily be provided within existing buildings that have not been specifically designed with such uses in mind.

6.3.38. As such, the proposed quantum of research and development floorspace as part of wider development proposals and employment floorspace is therefore in accordance with all levels of planning policy.

Principle of Research and Development Floorspace – Summary

- The research and development floorspace will result in a significant provision of jobs and provide wider social and economic benefits as well as meet an identified need for office floorspace within the locality and wider borough.
- The research and development floorspace will be complementary to the proposed industrial uses and other commercial uses proposed on Site.
- The research and development floorspace will meet the needs of a wide range of businesses including the growing med-tech sector which already exists in the borough.
- The addition of research and development as part of the industrial mix will also contribute to the diverse mix of commercial uses on Site to promote vibrancy of the new business cluster and complement the lighter industrial uses proposed.

3) OFFICE

Policy Context

National Policy

6.3.39. Chapter 6 of the NPPF sets out a presumption in favour of creating conditions to help build a strong, competitive economy.

6.3.40. Paragraph advises that a sequential test should be required for planning applications for 'main town centre uses' that are not in an existing centre and are not in accordance with an up to date Local Plan, including offices.

Regional Policy

- 6.3.41. The London Plan identifies at paragraph 6.2.1 that office employment projections suggest an increase of 619,300 jobs, from 1.98 million in 2016 to 2.60 million in 2041. Equivalent to between 4.7 and 6.1 million sqm of office floorspace or an increase of 31%.
- 6.3.42. Increases to the current stock and improvements to the quality, flexibility and adaptability of office spaces for different sizes is supported in mixed use developments under Policy E1 of the London Plan to meet this identified growth. Policy E1 directs new office development to town centres, existing business parks and locally oriented town centre provision to meet local needs (whilst having regard to town centre impacts) and any surplus office space is required to demonstrate sufficient evidence to justify the demand and supply for the proposed use.
- 6.3.43. Policy SD7 requires impact assessments for any proposals for new office uses outside of the town centre.
- 6.3.44. Policy E2 supports the provision and protection of a range of B use class business space whilst having regard to the type and use of the space.
- 6.3.45. Policy E8 promotes employment opportunities for Londoners across a diverse range of sectors including start-up/incubator spaces; flexible workspaces such as co-working and serviced offices; grow on/move on spaces for business and affordable workspaces at Part C.

Local Planning Policy

- 6.3.46. Policies E1 and E2 of the Local Plan support employment uses in the borough, including office provision. Policy E1 directs new office development to growth areas, central London and town centres, but also supports smaller scale office development at other sites and as set out in the Site Allocations Document at paragraph 5.24. Policy E2 states that the Council will consider the intensification of existing businesses premises provided they meet a range of criteria, including:
- retaining or intensifying employment floorspace
 - retaining existing businesses, in particular industrial uses
 - demonstrating that relocating businesses which support the CAZ or local economy will harm these functions
 - proposals include space for start-up and SMEs
 - increasing employment opportunities for local residents
 - that the redevelopment is part of a comprehensive scheme

- 6.3.47. Policy G1 sets out that the Local Plan seeks to meet LBC's objectively assessed needs to 2031 for 695,000sqm of office floorspace (as per the findings of the 2014 LBC Employment Land Study) in line with Policy E1. According to the latest Annual Monitoring Report ("AMR") 2017/18 published in 2019, the Council has lost a large quantum of office floorspace in recent years as a result of permitted development rights allowing its change to residential use without the need for applying for planning permission. LBC expect 383,411 sqm net additional office floorspace to be created over the next five to ten years, primarily in King's Cross Central, albeit a significant quantum is still required to achieve Policy G1's target.
- 6.3.48. The Employment Site and Business Premises CPG (2021) recognises this growth but outlines at paragraph 12 that the Council expect that a substantial proportion of the projected supply is likely to consist of larger floorplate space in Kings Cross and Euston, *"which are out of reach of micro, small and medium sized enterprises"*, in support of the delivery of smaller office floorplates.
- 6.3.49. Draft Policy KT3 of the Site Allocations Document supports the higher density provision of employment uses and significant increase in jobs, identified growth sectors and small and medium enterprises in Kentish Town.
- 6.3.50. Draft Site Allocation KT3 seeks to allocate the Site for comprehensive employment-led redevelopment that provides a mix of uses including *"employment uses"*. Specifically, paragraph 8.7 of the draft Plan sets out that the *"provision of some office space may be considered appropriate"* providing it is of a smaller scale and not alter the character of the area. Large floorplate 'corporate' offices are unlikely to be considered suitable.
- 6.3.51. This is echoed in Section 3.3.1 of the KTPF which states an *"An appropriate amount of supporting office uses could be included as part of the mix of uses, particularly in areas closest to the town centre, provided the site's industrial employment character is not affected"*.
- 6.3.52. The KTNP supports office uses as part of the mix of uses on Site under Spatial Policy KTPDA – Murphy Site. Supporting text to Policy SW1 supports Local Plan policy to retain and increase small business and office floorspace.
- 6.3.53. The DPNP supports and looks to retain employment uses to create a thriving multi-use neighbourhood with a range of employment activities at Policy CE4. The DPNP also encourages *"small workspaces to serve the needs of local businesses"* and *"some*

increase in employment floorspace to replace that recently lost nearby, such as the studios and offices in Linton House” as part of the Murphy redevelopment at paragraph 9.21.

Assessment of the Development

- 6.3.54. Alongside the proposed industrial uses, the provision of a maximum of 34,500 sqm office floorspace will lead to a further significant increase in employment opportunities in the borough with wider social and economic benefits in accordance with Local Plan objectives.
- 6.3.55. Whilst London Plan Policy E1 and Local Plan Policy E2 primarily directs office development to town centre locations, it also outlines that office provision is expected to come forward in Growth Areas and other locations as per the Site Allocations Document. The Site is located within the Kentish Town Regis Road Growth Area. Furthermore, Draft Site Allocations Document promotes high density “other employment” provision in Kentish Town at Draft Policy KT1 and Draft Site Allocation Document Policy KT3 sets out that other employment uses can come forward alongside industrial uses providing they reflect existing local business clusters and LBC’s growth sectors.
- 6.3.56. There is an existing cluster on Highgate Road which the proposed office floorspace will complement rather than compete with in line with Draft Site Allocation KT3. The adjacent Highgate Business Area consists mostly of small and medium sized workspace units, with few options of places for the businesses to go when they grow. The Development seeks to fulfil this need by providing suitably sized “move on space” to support their ambitions to grow and scale up. As such, the Commercial Impact Assessment by Urban Shape concludes that the proposals will support the promotion of the borough’s economic strategy with a diverse office market, responding to business growth opportunities and supporting continued borough business retention.
- 6.3.57. The supporting Commercial Strategy Report prepared by Hedge, Cushman and Wakefield and AND Consulting highlights that many local businesses in the borough have struggled to find appropriate workspace and have had to leave in support of this move on workspace provision and identifying a growth sector in line with Draft Site Allocation KT3. In addition to contributing towards meeting Policy E1’s identified need of 695,00 sqm of office floorspace in the borough by 2031, the proposed office floorspace will meet the demand for “move on” workspace once small and medium sized businesses have outgrown their start-up units and will help to retain local

businesses in the area.

- 6.3.58. The Local Plan does not identify Kentish Town centre as a priority location for new office development but notes that it has an important role for local services as well as shops, food, drink and entertainment. The office floorspace will therefore be complementary and not impact on the demand for existing office floorspace in Kentish Town Centre which meets a different type of need. On this basis, the supporting Retail and Office Sequential Site and Impact Assessment demonstrates that there will be no significant adverse impacts on the town centre (or other nearby centres) in support of this approach. It concludes that the office proposals will likely generate new arrivals of footfall to the area substantially contributing to the economy of Kentish Town Centre.
- 6.3.59. The proposed office space is designed to be flexible and predominantly meet the needs of SMEs in accordance with Local Plan Policy E1(a), the DPNP and KTNP which supports businesses of all sizes, in particular smaller businesses to meet local needs. As such, large floorplate 'corporate' offices are not proposed in line with local planning policy. Furthermore, this type of office provision, catering for the smaller and local businesses, makes an important contribution to not only the vibrancy of the masterplan but is also a complementary use in terms of its surrounding context.
- 6.3.60. The letting and management strategy for the Site will be balanced to nurture the growth of SME and marker space companies as well as reinforce the underpinning nature of the value of the Development site with larger corporate occupiers. Potential controls for securing and managing the office floorspace on a 10-year basis from the date of first occupation considered are as follows.
- No less than 60% of the on-site office floorspace will be safeguarded for occupation by qualifying businesses or existing local businesses (regardless of their size), unless otherwise agreed in writing by the LPA. Single lets will be capped at 35,000 sqft NIA (roughly equivalent to 3,250 sqm);
 - No more than 40% of the on-site office floorspace will be available for occupation by non-qualifying business, and single lets will be capped at 50,000 sqft NIA (roughly equivalent to 4,650 sqm), unless otherwise agreed in writing by the LPA.3.
 - If qualifying businesses expand over the course of their operation on site and require move on space, they will be allowed to stay on site and expand their business premises even if 40% of on-site office floorspace is already let to non-qualifying businesses.

- Market facing leasing arrangements with flexible leasing terms will be provided for all office floorspace on site, including
 - Lease lengths.
 - Flexible break clauses.
- Impose an active management policy to enable—where commercially practical—the ability of qualifying businesses to scale up and downsize where appropriate and available.

6.3.61. These controls will not prevent the leasing of office space to a workspace provider that could fit out, subdivide, lease and manage the space for a variety of occupiers in line with the terms above.

6.3.62. On this basis, the provision of new office floorspace meets the requirements of Policy E2 by:

- Coming forward alongside reprovided industrial floorspace, facilitated by the existing occupier who is in the process of relocating the main industrial uses elsewhere;
- Meeting a demonstrated need for this type of employment floorspace at local and strategic level;
- Making a significant provision for start-up and SMEs;
- Providing employment opportunities for local residents through intensifying the quantum of employment floorspace on Site, providing move on space for growing businesses in the area and affordable workspace, and committing to a bespoke employment and training strategy with provisions for local employment; and
- Giving due consideration to comprehensive redevelopment of the area, providing a masterplan for the Site and safeguarding connections to the Regis Road area should it come forward for redevelopment in the future.

6.3.63. Overall, the proposed quantum of office floorspace as part of the development proposals is therefore both appropriate in terms of size and amount and in accordance with all levels of planning policy and the Employment Site and Business Premises CPG.

Principle of Office Floorspace – Summary

- New office floorspace will result in a significant provision of jobs and provide wider social and economic benefits as well as meet an identified need for office floorspace within the locality and wider borough.

- The offices will be complementary to the existing Highgate Road Business Area and Highgate Studios, with the potential to act as 'move on space' for businesses to grow and stay in the area.
- The proposals will be complementary and will not have a significant adverse impact on the demand for existing office floorspace in Kentish Town District Centre which meets a different type of need.
- The office floorspace is designed to meet the needs of a wide range of medium and small-sized tenants as preferred by the community.
- The proposals will not impact on the borough's existing supply of traditional large floor-plate corporate office space, instead developing and expanding Camden's successful economy still further through newer, complementary growth sectors.
- Office use will contribute to the diverse mix of commercial uses on Site to promote vibrancy of the new business cluster and help to activate the public realm.

4) Affordable Workspace

Policy Context

Regional Policy

- 6.3.64. Policy E1 Part G of the London Plan sets out that developments comprising office floorspace should consider the need for a range of suitable workspace including lower cost and affordable workspace to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space.
- 6.3.65. Policy E2 Part D outlines that proposals for new B Use Class business floorspace greater than 2,500 sq.m. (gross external area), or a locally determined lower threshold, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises. Supporting Paragraph 6.2.6 identifies that this workspace can include a variety of types of space including serviced offices, co-working space and hybrid industrial space for B1c/B2/B8 uses. What constitutes a reasonable proportion of workspace suitable for SMEs should be determined on the circumstances of each case.
- 6.3.66. Policy E3 specifically relates to affordable workspace, defined as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. It can be provided and/or managed directly by a dedicated workspace provider, a public, private, charitable or other supporting body; through grant and management arrangements (for example

through land trusts); and/or secured in perpetuity or for a period of at least 15 years by planning or other agreements. Policy E3 requires Councils to identify areas where there is a need for affordable workspace, based on local evidence of need and viability.

- 6.3.67. Policy E8 seeks to promote employment opportunities for Londoners across a diverse range of sectors. In order to achieve this, Part C identifies and supports a range of workspaces including start-up / incubator spaces; flexible workspaces such as co-working and serviced offices; grow on / move on spaces for businesses and affordable workspace.
- 6.3.68. Where justified and supported by evidence of local need, Policy E9 also seeks to secure affordable commercial and shop units, acknowledging that commercial activity provides opportunities for micro, small and medium-sized enterprises to establish and contribute to the diversity of town centres.

Local Planning Policy

- 6.3.69. The Local Plan sets out at paragraph 4.14 that LBC will seek to reduce inequality through training and apprenticeship schemes and affordable space for small and medium-sized enterprises (SMEs) managed by businesses, higher education institutions and the third sector, secured by S106 agreements where viable.
- 6.3.70. Policies E1 and E2 of the Local Plan seek to ensure there is a continuing supply of small and medium-sized employment premises that can accommodate a range of business types and sizes, in particular small and medium-sized enterprises (SMEs) and businesses in growth sectors such as the creative industries.
- 6.3.71. Paragraph 5.44 of the Local Plan outlines that the Council will seek to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm or more, and terms of affordability considered on a case-by-case basis.
- 6.3.72. LBC's 2014 Employment Land Review study identifies Kentish Town as an emerging workspace hub for start-up, micro and small businesses and former industrial buildings have been recently converted to accommodate these types of users.
- 6.3.73. The Employment Site and Business Premises CPG (2021) outlines that the council "*will work with developers to agree appropriate terms of affordability on a case by case basis*" and sets out examples of ways in which affordability has been defined on

recent schemes in the borough. There is, however, no set requirement for the quantum of floorspace that should be provided as affordable, nor defined rental targets relative to open market values.

- 6.3.74. Other suggestions for providing alternative workspaces are also welcomed at paragraph 38 of the CPG, in recognition of the 'not one size fits all' approach to affordable workspace provision.
- 6.3.75. Paragraph 8.43 of the Draft Site Allocations Document outlines that the provision of a significant element of affordable workspace will be expected from the allocated Murphy Site (KT3).
- 6.3.76. The KTPF supports the success of small, medium and start-up businesses and light industrial, workshop/studio and maker-type spaces that support creative businesses.
- 6.3.77. Policy SW1 of the KTNP supports the retention and increase in floorspace for the use of small businesses.
- 6.3.78. Paragraph 9.13 of the DPNP encourages the inclusion of "*floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace*" at the Site where viable.

Assessment of the development

- 6.3.79. The Applicant is committed to supporting local businesses and a key focus of the commercial strategy for Murphy's Yard is to complement Kentish Town's thriving business community that need a new supply of space to enable businesses to continue to grow and safeguard jobs and opportunities within the borough. In line with the provisions and flexible approach to providing affordable workspace set out in the CPG, the scheme will provide circa 3,000 sqm of affordable workspace for the residents and businesses of the Borough, equating to c. 6% of the total quantum of the increase in commercial floorspace that is being delivered on site and in line with both local and strategic planning policy objectives.
- 6.3.80. Beyond the affordable workspace, the office space has been designed to cater largely for SMEs in accordance with the aspirations of Paragraph 5.44 of the Local Plan. Please refer to paragraph 6.3.59 of this Planning and Regeneration Statement for further details.
- 6.3.81. The CPG and its examples of approaches to affordability have been considered in detail and it is proposed that the affordable workspace to be delivered on Site will

support the start-up and small business community in the Borough and provide space that is flexible and accessible to early-stage businesses that need help at the beginning of their business journey. It is envisaged that this affordable workspace will be a mix of industrial and office space in line with strategic and local planning policy which support the provision of affordable workspace that support the success of small, medium and start-up businesses, light industrial, workshop/studio and maker-type spaces, and small units suitable for independent stores and businesses. The Proposed Development seeks to complement Kentish Town's thriving business community that need a new supply of space to enable businesses to continue to grow and safeguard jobs and opportunities within LBC.

6.3.82. It has not yet been decided whether the space will be leased to an affordable workspace provider to manage or whether the space will be leased directly to local businesses that meet the affordable workspace criteria. A decision on the direction will be made closer to completion of the new buildings, but the Applicant has set some guiding principles to inform the decision making process and help to ensure the affordable workspace has a major impact on creating a sustainable and dynamic business cluster that provides genuine support to early stage local businesses, as set out in the supporting Commercial Strategy. The space should offer flexible terms and conditions to new businesses including:

- The ability to scale up and scale down in unit size within the development as the need arises;
- To provide space that is ready to lease;
- To monitor take up of affordable workspace in line with STEAM objective and provide access to this data to Council and key stakeholders as required. Commitment to monthly dialogue with Camden Inclusive Economy team to review data and agree necessary actions;
- Additional business support for hard to reach ethnic minority communities that struggle to lease workspace based on monitoring.

6.3.83. Further provisions will be sought and controlled by the Applicant to ensure that end users comply with overarching commitments for local employment and training provision as detailed in the accompanying Employment and Training Strategy.

6.3.84. The Applicant has actively considered the need for affordable workspace on Site and the Proposed Development will provide a significant quantum of floorspace in line with local policy and guidance. On this basis, it is considered that the requirements of Local Plan policy E1 and E2, Draft Site Allocation KT3, Employment Site and Business Premises CPG, and London Plan Policy E3 have been satisfied, providing

workspace suitable for SMEs and affordable (discounted) workspace in the former B use class and at rents maintained below the market rate for start-up / early stage businesses and potentially creative workspaces as identified by the London Plan.

6.3.85. An Employment and Training Strategy prepared by the Applicant is also submitted in support of this planning application, setting out the inclusive employment and training opportunities and initiatives which will be carried through to the construction and operational phase of the Development.

6.3.86. The proposed affordable workspace offer will deliver an exciting opportunity for new and growing local businesses, contribute towards the placemaking and identity of the site and deliver real social benefits for the community, in line with all levels of planning policy objectives and the Employment Site and Business Premises CPG.

Affordable Workspace – Summary

- The Development will result in the delivery of a significant quantum of affordable workspace available to local businesses, provided at rents maintained below the market rate;
- Both industrial and office affordable workspace will be provided on Site to meet the needs of a range of businesses looking to grow and operate in a well-designed environment;
- The affordable workspace will create opportunities to support artists and small creative industries as well as start-ups in a prime central London site;
- The affordable workspace will have the potential to create unique spaces for a range of other sectors including charities and community organisations, social and educational enterprises;
- The affordable workspace is a complementary use which will add character to the Development, assist with placemaking;
- The affordable workspace will increase engagement and enjoyment of the new buildings proposed;
- The affordable workspace will assist with the economic development and community engagement in Kentish Town, generating positive impacts on the local economy;
- It is envisaged that the affordable workspace will create opportunities to bring together new and established companies to create potential synergies and collaboration;
- The supporting Employment and Training Plan sets out how employment and training opportunities will be maximised as a result of the proposals;

- It is envisaged that the affordable workspace will lead to potential synergies with Murphy's & Sons, leading the industry with their inclusive employment and training opportunities and policies.

5) RETAIL AND LEISURE

Policy Context

National Policy

- 6.3.87. Chapter 6 of the NPPF sets out a presumption in favour of creating conditions to help build a strong, competitive economy.
- 6.3.88. Chapter 7 of the NPPF seeks to ensure that planning policies and decisions support the role that town centres play and take a positive approach to their growth, management and adaptation.
- 6.3.89. Outside of town centre locations, preference is given to accessible sites that are well connected to the town centre and flexibility on format on scale encouraged at Paragraph 87.
- 6.3.90. The NPPF requires applications for more than 2,500 sqm gross retail and leisure floorspace outside of town centre locations to satisfy the sequential test as set out in Paragraph 89.

Regional Policy

- 6.3.91. The London Plan recognises the importance of town centres and that boroughs plan positively to meet the needs of their communities. Policy SD6 relates to town centres and high streets outside of the Central Active Zone (CAZ) and seeks to protect them.
- 6.3.92. Policy SD7 goes further and states that when considering development proposals, boroughs should take a *"town centres first approach, discouraging out-of-centre development of main town centre uses"*. In accordance with the NPPF, Policy SD7 requires developments to apply the sequential test for main town centre uses and applications that are likely to have a significant adverse impact should be refused. Supporting paragraph 2.7.4 states that *"This applies to development greater than a locally set floorspace threshold, or 2,500 sq.m. if a local floorspace threshold has not been set"*.
- 6.3.93. Chapter 6 of the London Plan recognises that *"commercial activity provides*

opportunities for micro, small and medium-sized enterprises to establish and contribute to the diversity of town centres. Independent businesses, including shops, cafés and restaurants, play an important role in supporting the vitality and vibrancy of town centres and local communities, and many operate from smaller premises”.

- 6.3.94. Policy HC6 supports the night-time economy and opportunities to encourage a 24-hour offer through a diversity of uses.
- 6.3.95. Policy E10 seeks to strengthen London's visitor economy and associated employment particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.

Local Planning Policy

- 6.3.96. Policies E1 and E2 of the Local Plan supports employment uses in the borough, including retail provision. Part i of Policy E1 states that LBC recognises the importance of other employment generating uses including retail.
- 6.3.97. Policy G1 sets out that the Local Plan seeks to meet LBC's objectively assessed needs to 2021 for c30,000sqm of retail floorspace in line with Policy TC1.
- 6.3.98. Kentish Town is identified as one of LBC's 37 Neighbourhood Centres within the Local Plan.
- 6.3.99. Policy TC1 focusses new shopping and related uses in LBC's designated growth areas and existing centres, having regard to the level of capacity in these areas. The policy goes on to outline that an *“appropriate provision”* and *“limited provision of small shops outside centres to meet local needs”* should be delivered in Neighbourhood Centres. Furthermore, *“this retail floorspace is expected to be supported by a range of other town centre uses including food, drink and entertainment uses”*.
- 6.3.100. Policy TC1 applies a sequential approach to retail and other town centre uses outside of the areas identified in the Policy for proposals of 2,500 sqm or more retail floorspace. *“Only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations”*.
- 6.3.101. LBC will ensure that development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours at Policy TC4 of the Local Plan.

- 6.3.102. Policy TC5 supports and expects large retail developments to include a proportion of smaller units and independent shops. Supporting paragraph 9.51 defines units of less than 100 sqm GIA as suitable for such premises.
- 6.3.103. Opportunities for new leisure facilities in major, mixed use developments and support the temporary use of vacant buildings are supported by LBC at Policy C3 providing they take into account of their associated impacts and are well accessible.
- 6.3.104. Draft Policy KT1 of the Site Allocations Document envisages the Kentish Town Area to become a new neighbourhood that provides a mix of uses, including a cultural and leisure offer. Paragraph 8.11 clarifies that this comprises retail, food and drink uses that complement and do not compete with the existing centres. Draft Site Allocation Policy KT3 requires development at the Site to be in accordance with Policy KT1, along with its allocation for a comprehensive employment-led redevelopment.
- 6.3.105. Part 3.2.1 of the KTPF expects new development on the Site to include a proportion of supporting food, drink and retail space in suitable location. This is in recognition that a mix of uses *“converge to create a vibrant character, with mixed used activity during the day and night, creating a safe and welcoming environment. Development should seek to support Kentish Town Centre and Queen’s Crescent Neighbourhood Centre and should not compete with them. Retail is therefore expected to be limited, and any provision would be expected to be complementary to the High Street”*.
- 6.3.106. The KTNP supports a mixed-use approach to the Site to ensure the continuing viability of industrial uses. Policies SW2 and SW3 relate to the protection of secondary retail frontages in Kentish Town Road.
- 6.3.107. The DPNP identifies at paragraph 9.21 that any retail, food and drink provision should complement existing businesses on Highgate Road. The DPNP recognises Murphy's Yard as an opportunity to enhance the area with a mix of employment and residential uses.

Assessment of the Development

- 6.3.108. Underpinning the masterplan is the approach to leisure, health and wellbeing and creating a sense of place within and around the Site. At the centre of this is up to 1,500 sqm GEA (with a minimum provision of 1,300 sqm) of flexible mixed-use

floorspace which is proposed for the ground floor level of Shed 2. This space is expected to provide a range of retail, leisure and light industrial floorspace alongside flexible events space at the heart of the site. It has been designed to be flexible and adaptable to a range of retail and leisure uses which can vary across the year.

- 6.3.109. Given its prominent location in the centre of the Site and unique character as part of the grouping of locally listed railway sheds, a significant amount of additional consideration has been given to the design and likely uses of Shed 2, and these are set out in detail in the accompanying Design and Access Statement. The indicative layouts show how the flexible uses proposed for this plot could come forward to create a vibrant cultural hub in the middle of the Site that can incorporate various uses that will increase vibrancy at ground floor level.
- 6.3.110. Parameter Plan 09 and 10 allow for retail and leisure uses to be delivered on the ground floor of Shed 2 and 3 and within the ground floor of the residential plots in the northern part of the Site. The exact distribution of retail and leisure uses and configuration of units will be subject to RMAs for each Plot.
- 6.3.111. The proposals also allow for between 700 sqm to 3,650 sqm GEA of retail and commercial uses to come forward within the masterplan to support the wider mix of residential and business uses. Provision is also made for the scheme to support a small quantum of convenience retail to support residents and the businesses with a focus on interesting, predominantly independent and local businesses that offer a point of difference and would not or cannot be based on the High Street. The offer is designed to create an improved and extended Kentish Town centre that creates new reasons for people to visit and create additional footfall and businesses. Flexibility in the masterplan also allows for ancillary retail floorspace expected to accommodate small scale shops, café/restaurant and community uses which support the residential plots to come forward at ground floor level. The parameter plans set out where active frontages will be required within the scheme which can be met by these uses.
- 6.3.112. Although the Site is not located within a designated town centre the limited amount of retail floorspace proposed is necessary to complement the other business and non-commercial uses on Site and create vibrancy from a placemaking perspective. This proportion and approach to mixed use is supported in the site's Draft Site Allocation KT3 and KTPF Policies.
- 6.3.113. The Development seeks to support Kentish Town Centre and Queen's Crescent Neighbourhood Centre and not compete with them. The application is supported by

a Retail and Office Sequential Site and Impact Assessment that demonstrates that the proposals will not have a significant adverse impact on the vitality and viability of the town centre. The operator mix and number of units proposed is limited and will serve the everyday 'top-up' shopping and retail service needs of the newly created community within Murphy's Yard, and will not form a destination attracting people from further afield. The additional footfall in the area will also benefit the existing retail offer along the High Street which will help contribute to its vitality.

6.3.114. As well as taking into account of the needs of businesses and industry, the diversity of retail and leisure uses proposed will support visitors and associated employment in line with strategic policy. The retail and leisure floorspace will also provide opportunities for independent, micro, small and medium-sized enterprises to establish and contribute to the vibrancy of the town centre and local community, further diversifying the employment offer on site and capture wider, new audience. As such, the Retail and Office Sequential Site and Impact Assessment concludes the sui generis uses found within Shed 2 will be very different to businesses on Kentish Town Road, creating new and diverse reasons for people to visit a revitalised new neighbourhood and complementing the high street.

6.3.115. Overall, the delivery of retail and leisure floorspace is therefore considered to be in accordance with all levels of planning policy with no significant adverse impact on Kentish Town centre and instead supports the visions and aspirations of the NPPF and Development plan with wider benefits for the area.

Principle of Retail and Leisure Floorspace – Summary

- The proposed retail and leisure floorspace will contribute to the creation of jobs on site.
- The retail uses will play an important role in supporting the new uses within the masterplan, including a significant quantum of new housing.
- This floorspace will contribute to the vibrancy of the masterplan by maximising opportunities for ground floor activation and creating spaces for people to socialise.
- The retail and leisure uses have been designed to complement, not compete with, Camden's existing town centres, in particular the Kentish Town centre. The Commercial Impact Assessment concludes that the proposed retail and leisure uses would not result in detrimental impacts to these centres.
- The retail and leisure floorspace will contribute to the vibrancy and vitality of the wider area by attracting more people to the area other than for employment.

- The controls within the planning application allow for flexibility in terms of where and what specific retail uses come forward, which will allow for the ultimate provision to respond to the needs of the market and further community consultation.

6) COMMUNITY

Policy Context

National Policy

- 6.3.116. Paragraph 20 of the NPPF requires strategic policies to make sufficient provision for community facilities such as health, education and cultural infrastructure, amongst other uses.
- 6.3.117. Paragraph 92 outlines that planning policies and decisions should plan positively for the provision and use of community facilities and local services to enhance the sustainability of communities and residential environment. This includes the delivery of strategies to improve health, social and cultural well-being for all sections of the community.

Regional Policy

- 6.3.118. The London Plan defines 'Social Infrastructure' as a range of facilities including health provision and community.
- 6.3.119. Policy GG1 of the London Plan promotes inclusive growth and access to good quality community spaces, services, amenity and infrastructure that accommodate, encourage and strengthen communities.
- 6.3.120. Policy S1 supports the delivery of high-quality, inclusive social infrastructure in developments, that addresses local or strategic need.
- 6.3.121. The co-location of facilities with other uses such as other forms of social infrastructure or housing is encouraged at Paragraph 5.2.8 for the more efficient use of land and enable a more integrated service delivery.

Local Planning Policy

- 6.3.122. Policy C2 of the Local Plan supports new and improved community facilities including plans for educational, health, scientific and research bodies to expand and enhance

their operations, taking into account the social and economic benefits they generate for LBC, London and the UK.

- 6.3.123. Paragraph 5.33 recognises that “*jobs are provided by many types of uses within the borough, not just those based in offices or industrial premises*” including knowledge-based sectors such as health and education. Policy C2 seeks to support this.
- 6.3.124. Draft Policy KT1 of the Site Allocations Document envisages the Kentish Town Area to become a new neighbourhood that provides a mix of uses, including community facilities. Draft Site Allocation Policy KT3 identifies a range of uses to be delivered on Site including community facilities.
- 6.3.125. Section 3.2 and 3.2.1 of the KTPF identifies the delivery of inclusive community facilities to support the local community as one of the key objectives to employment-led mixed-use development.
- 6.3.126. Paragraph 9.21 of the DPNP identifies community uses as one of the uses to be provided on Site.

Assessment of the Development

- 6.3.127. The Development will provide a minimum of 300 sqm and up to 1,300 sqm GEA of commercial and community floorspace (Use Class E and Use Class F1/F2). The community floorspace could comprise learning and non-residential institution (Class F1) and/or local community (Class F2) uses.
- 6.3.128. It is envisaged that the proposed community floorspace will support other commercial and social facilities on site and its residential community. This co-location approach is encouraged by the London Plan for the more efficient use of land and integrated service delivery.
- 6.3.129. A further minimum of 700sqm retail/commercial floorspace is proposed for (E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis uses which could provide for uses such as a day nursery or creche, a gym or indoor recreation uses.
- 6.3.130. As part of the public consultation process on the masterplan the Applicant undertook a community uses survey to identify the local priorities for community floorspace that could be provided on site. This exercise demonstrated that:
- There was widespread support for a multi-purpose community events space on site, which could be used a space to host meetings of local community groups.

- Further suggestions included:
 - An art gallery/artist space
 - Indoor sports facilities
 - A community kitchen/café
 - A job opportunity hub
- The most popular types of indoor sports facilities included:
 - A yoga/pilates studio
 - A dance studio
 - A gym
 - A badminton court
- In terms of open spaces, popular suggestions included:
 - Kitchen gardens
 - Outdoor events space
 - Intergenerational play space

6.3.131. The specific uses and locations for the community floorspace will be determined at the RMA stage following further discussions with stakeholders and alongside the detail design. As shown on Parameter Plans 9, 10 and 11 the community use could come forward within the northern plots (S, J, K, L, M, N, O, P, and Q).

6.3.132. The proposed flexible commercial and community floorspace is therefore considered a complementary land use and will help enhance the sustainability of communities and residential environment in line with all levels of planning policy.

Principle of Community Floorspace – Summary

- The aspirations for the community floorspace have been considered through public consultation.
- Community floorspace is supported by all levels of planning policy.
- A minimum quantum of commercial and community floorspace (300 sqm) will be provided as part of the Site's redevelopment.
- A further minimum of 700 sqm retail/commercial floorspace is proposed for (E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis uses which could provide for uses such as a day nursery, creche, gym or indoor recreation uses for the community.
- The controls within the planning application allow for flexibility in terms of where and what specific community uses come forward, which will allow for the ultimate provision to respond to the needs of the market and further community consultation.

- The ultimate provision and specific use for the community floorspace will come forward as part of the reserved matters application process and will be informed by further consultation and public engagement.

7) HEALTHCARE

Policy Context

National Policy

- 6.3.133. Paragraph 8 sets out the three strands to achieve sustainable development. This includes social objectives which supports strong, vibrant and healthy communities by supporting health.
- 6.3.134. Paragraph 20 sets out that strategic policies should make sufficient provision for community facilities such as health.

Regional Policy

- 6.3.135. Healthcare facilities are considered to be an essential infrastructure to help businesses success in London in the London Plan. Paragraph 5.2.1 identifies that the health service is also one of the capital's major employers, with over 200,000 people working in the NHS in London.
- 6.3.136. Policy S2 of the London Plan specifically supports the provision of high-quality new and enhanced health and social care facilities and new models of care to meet identified need. Whilst the London Plan acknowledges is "*no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services*", the plan sets out four broad types of health infrastructure provision:
- *Primary Care - GP practices, plus community pharmacists, dentists and opticians*
 - *community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting*
 - *acute provision*
 - *specialist provision.*
- 6.3.137. Paragraph 5.3.9 of the London Plan supports the co-location of social infrastructure with housing, to use land more efficiently and to enable a more integrated service delivery.

6.3.138. Policy HC6 also recognises medical services as a contributor to the night-time Economy as they employ large number of night-time workers.

Local Planning Policy

6.3.139. The LBC Regeneration and Planning Authority Monitoring Report 2017/18 published in 2019 notes a gross demand of 19 additional full-time equivalent GPs borough wide, including the creation and expansion of facilities and colocation with other community services (source: AECOM Infrastructure Study). The North Central London Sustainability and Transformation Plan (2017) also identifies issues arising from the ageing of the primary care workforce and recruitment of new staff, and a significant number of practices in the area provide accommodation which is no longer fit for purpose.

6.3.140. Local Plan Policy C1 seeks to improve and promote strong, vibrant and healthy communities through ensuring a high-quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. Part D supports the provision of new or improved health facilities, in line with LBC's Clinical Commissioning Group and NHS England requirements.

6.3.141. Paragraph 2.7 outlines that in order to make the most of limited land in the borough, development should seek to deliver not only homes, but also employment space together with the services and facilities that are needed to maintain and create healthy and sustainable communities.

6.3.142. Part 7b of the KTNP Vision notes that the provision for new health institutions where development would increase the local population is essential.

6.3.143. Policy SP2a of the KTNP sets out the general development criteria for future developments in the area. Part VI (a) requires mitigation to offset the impact of development on existing local healthcare facilities and educational provision. This is expected to be secured either through a financial contribution from the developer or the direct provision of new facilities by the developer such as a health centre.

6.3.144. The KTPF states that a key message from the community feedback when preparing the plan was that healthcare provision is important. This is reflected in Policy 3.4 which seeks to deliver health/education and community facilities that are required to meet anticipated population growth.

Assessment of the Development

- 6.3.145. Planning permission is sought for a maximum of 16,000 sqm GEA of healthcare (Use Class E(e) and sui generis) in the outline phase of the Development. It would primarily be located in Plot I, and the masterplan makes provision for smaller scale healthcare uses to be provided at the ground floor level throughout the masterplan.
- 6.3.146. A Needs Based Assessment for Healthcare prepared by Cushman and Wakefield has been submitted in support of this application and assesses the current need and anticipated demand for healthcare uses with LBC. In summary, its main findings are:
- The supply of approved healthcare schemes in LBC is extremely limited.
 - The private sector is likely to be contributing to the NHS service provision for the foreseeable future.
 - Specific localised demand for certain uses (detailed below at paragraph 6.3.150).
 - Key life sciences operators are in need of space within the borough.
 - There is foreseeable demand relevant to the Murphy's Yard site for localised and community focused healthcare needs in Camden against a backdrop of global operator interest.
 - The Site is uniquely positioned to appeal to a wide range of healthcare services and providers.
- 6.3.147. It is against this backdrop that the proposals include the provision for up to 16,000 sqm of healthcare use (Class E(e)), 8,000 sqm of residential institution use (Class C2), as well as 36,000 sqm of research and development use (Class E(g)(ii)) which will complement the wider health provision (in addition to its potential contribution within the industrial provision as well).
- 6.3.148. Located within Central London and within 1km of the main Royal Free Hospital Campus, the site is considered to be strategically located to provide essential healthcare facilities that will not only benefit LBC but the wider North London community. The proposed healthcare floorspace will be aimed at addressing the area's clinical capacity needs and local community (not emergency core hospital facilities).
- 6.3.149. The site of the Royal Free, having been built in 1973, is now fully developed and at maximum capacity. Various elements of the core hospital require additional accommodation, although this is tempered by limited capital budgets and development finance, exacerbated by current disposals of hospital real estate, including Hampstead Gardens and the St Pancras Hospital. The Royal Free therefore has a number of operational real estate needs and requirements if it is to maintain

its position as a major teaching hospital and a premier provider of NHS medical services to North London. The Site is subsequently well suited to support facilities for the main hospital. The capacity that a building in Murphy's Yard could provide akin to that being proposed at Royal College Street is such that it would allow the Foundation Trust to have access to a new flexible facility which could afford essential support to the main procedures and operations being undertaken at the Royal Free and other hospitals and clinics in LBC.

- 6.3.150. The strong level of public and private demand and very limited supply of appropriate and deliverable healthcare real estate opportunities has also been identified in the market research undertaken by Cushman and Wakefield. With the recently announced closure of St Pancras Hospital, together with increasing demands on the Central London Health Service, allied to an expectation of significant investment in the same by a new Government, their findings indicate that there would be a good level of demand and interest in the Murphy's Yard site from both public and private operators alike.
- 6.3.151. Moreover, in light of the Covid-19 pandemic which has brought about uncertainty in the property market it is considered that this proposed healthcare use is not only an essential use, but one of the most stable and certain land uses going forward. The stresses on clinical capacity across London have undoubtedly become very apparent during the current Covid-19 pandemic, where the NHS has been running at full capacity and forced to open temporary facilities in order to treat patients across the full spectrum of healthcare. The crisis has particularly highlighted the shortage of acute treatment beds throughout the UK, but especially in London and other larger metropolitan/urban locations where the effects of the virus have been experienced the worst.
- 6.3.152. Conversations are ongoing with the NHS and the North Central London CCG to ensure that there is an identified demand for the proposed healthcare use that can be built upon at the RMA stage. Securing a firm commitment from these entities as they concentrate focus and resources on the pandemic is understandably difficult, however through dialogue with these groups need for the following facilities has been identified as current NHS requirements within LBC:
- Geriatric Rehabilitation (60,000 – 80,000 sqft)
 - Dialysis/Renal Unit (20,000 – 30,000 sqft)
 - Community Healthcare Hub (20,000 sqft)
 - Fertility Clinic (10,000 -15,000 sqft)
 - Diagnostics (10,000 sqft)

- 6.3.153. Correspondence from the Camden and Islington NHS Foundation Trust included within the Healthcare Needs Assessment confirms their need for a rehabilitation facility and renal dialysis unit and that Murphy's Yard would be a suitable location for these uses.
- 6.3.154. As such, the proposed healthcare use seeks to provide high-quality new and enhanced health facilities to meet identified need and support London and Camden's role as a centre of medical excellence in line with planning policy objectives.
- 6.3.155. Whilst the end-user is not secured at this outline stage, in addition to the Camden and Islington NHS Trust, there are a number of users which have been identified as potential future tenants. Albeit, it is important that future operators have the flexibility they require to be able to respond to medical needs as they arise.
- 6.3.156. Given the incredibly limited number of sites allocated for and suitable for healthcare use, operators also have to be flexible on location. The key driver for the successful location of a healthcare development is access to and accessibility for clinicians; in this case proximity to the Royal Free.
- 6.3.157. Moreover, the provision of new healthcare floorspace is in line with the more local KTNP vision which requires mitigation from developments that would increase the local population to offset the impact of development on existing local healthcare facilities. This could be achieved directly on site whilst having the flexibility to adapt to market needs as they arise. Community feedback has also highlighted that provision of social infrastructure, including health facilities, is important.
- 6.3.158. The proposed healthcare use will also have placemaking benefits as a complementary use with both the commercial and residential environments coming forward on site and will help support the night-time economy, as recognised by the London Plan which encourages its co-location. As detailed above in the discussion of the proposed research and development uses, the med-tech and e-health sectors could make a significant contribution to the on-site business community and would further complement the proposed health use.
- 6.3.159. Overall, there is a clear identified demand for a healthcare use on Site and its delivery will be in accordance with all levels of planning policy with social and economic benefits. The accessibility, location of the site and the setting are such that it affords an outstanding opportunity to develop a fit-for-purpose building which will be of lower operational cost, more efficient, more productive and ultimately more beneficial to the

community than seeking to convert an inappropriate existing non-medical building at some juncture in the future. The opportunity to develop a new purpose-built healthcare facility is rare in Central London and particularly in this area where the need of the community is self-evident, particularly at the present time.

Principle of Healthcare Floorspace – Summary

- There is a demonstrable need for various types of healthcare floorspace within Camden, and this provision is supported at a regional level.
- The Site is uniquely placed to support existing healthcare hubs, including the nearby Royal Free, and can accommodate need arising from these facilities.
- The masterplan anticipates the ability for the healthcare use to co-locate with research and development facilities in the med-tech and life sciences sectors which would generate mutual benefits for these uses.

RESIDENTIAL USES

8) PRINCIPLE OF RESIDENTIAL USE

Policy Context

National Policy

6.3.160. Chapter 5 of the NPPF seeks to deliver a sufficient supply of homes.

6.3.161. Paragraph 59 specifically outlines the “Government’s objective of significantly boosting the supply of homes” and that “*it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay*”.

6.3.162. Paragraph 67 requires policy-making authorities to have a clear understanding of available land and identify a sufficient supply and mix of sites for years one to five of the plan period. Planning authorities are then required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement (in addition to any buffers) as per paragraph 73.

6.3.163. Paragraph 72 outlines that “*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements*”.

or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities”.

6.3.164. To maintain the supply of housing, LPAs should monitor progress in building out sites which have permission. The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities. Where the HDT indicates that delivery has fallen below 95% of the LPA's housing requirement over the previous 3 years, the LPA should prepare an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future year, in accordance with paragraph 75 of the NPPF.

Regional Policy

6.3.165. The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) which has identified need for 66,000 additional homes per year. The Strategic Housing Land Availability Assessment (SHLAA) identifies that there is capacity across London for approximately 40,000 new homes a year on 'large sites', defined as greater than 0.25 hectares in size.

6.3.166. Policy H1 of the London Plan seeks to increase housing supply to meet this identified need and sets out ten-year targets for net housing completions which LPAs must plan for. Table 4.1 sets out a ten-year housing target of 10,380 net housing completions (2019/20 -2028/29) for LBC.

6.3.167. Part 2 of Policy H1 outlines that housing delivery should be optimised on all suitable and available brownfield sites, especially those which are highly accessible and have a PTAL rating higher than 3.

6.3.168. The Mayor recognises, at paragraph 41.3 that *“development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered”.*

Local Planning Policy

6.3.169. Policy H1 of the Local Plan seeks to maximise housing supply and exceed a target of 16,800 additional homes from 2016/17 - 2030/31.

6.3.170. The draft Site Allocations Document identifies Kentish Town as having an indicative housing capacity of 2,000 additional homes. The Site 'KT3' is allocated to deliver circa 750 additional homes to meet this need.

- 6.3.171. The KTNP identifies Kentish Town as a 'Potential Development Area' for mixed-use development, while retaining, and where possible increasing, the level of industrial floorspace and employment opportunities. It notes that housing is "badly needed" in Kentish Town and mixed-use development would benefit the neighbourhood area and London as a whole.
- 6.3.172. The DPNP identifies the Site as providing an opportunity for development for a mix of residential and business/employment units to enhance the area.

Assessment of the Development

- 6.3.173. Each year the Council produces an Authority Monitoring Report ("AMR") which monitors and assesses the effectiveness of its Local Plan and targets. The latest AMR 2017/18 was published in 2019 setting out the Council's most recent position on housing performance. According to the report, and against their Local Plan target of 1,120 dwellings per annum ("dpa") (adjusted to 1,176 with a 5% buffer), the Council can demonstrate a five-year supply (2019/20 – 2023/24) of 6,308 homes (or circa 1,262 dpa), which exceeds their requirements.
- 6.3.174. Furthermore, the AMR estimates that 325 dwellings will be delivered in Kentish Town Regis Road Growth Area within this period. The Murphy site is not included in the trajectory.
- 6.3.175. However, the latest HDT, published January 2021, sets out that against LBC's annual local plan requirement of 1,120 dpa for 2017/18 and 2018/19 and 1,025 dpa for 2019/20 (reduced due to the impacts of Covid-19 on the construction sector) - equating to 3,265 dwellings in total, the Borough has only delivered 2,568 additional dwellings in the last three years. This equates to an average of circa 850 additional dwellings. As a result, the Borough scored a HDT measurement of 79%, below the required 95% target, and 85% threshold requiring an increased buffer of 20% to be added to LBC's housing requirement.
- 6.3.176. Planning permission is sought for a minimum of 750 (and maximum of 825) Class C3 residential units. The first phase of development will deliver housing, with Plot C planned to deliver c. 30 affordable intermediate rent homes.
- 6.3.177. The delivery of a minimum of 750 new dwellings on a large brownfield site, which has a draft site allocation identified as having an indicative housing capacity for 750 homes, as part of a mixed use development clearly meets an identified need for much needed market and affordable homes in the borough. The proposed quantum of housing will

make a significant contribution to meeting both LBC's and London's housing targets.

6.3.178. Housing delivery is a significant part of Development and will play a crucial role in meeting the regional and borough-wide housing targets which can only be brought forward through the comprehensive redevelopment of the Site. The significant delivery of new dwellings is in accordance with national, regional and local planning policy. It meets a particularly profound need at the local level with housing identified as "badly needed" in Kentish Town.

6.3.179. Details with regards to affordable housing and housing mix are provided in sub-sections 9 and 10.

Principle of Residential Use – Summary

- Housing delivery is a key aspiration of LBC and the GLA and the Site is identified as being suitable for significant housing provision through the emerging Site Allocations Local Plan.
- The Proposed Development commits to providing a minimum of 750 homes, a significant windfall against the Local Plan housing trajectory that will help to meet objective assessments of housing need and community aspirations for new homes.
- The introduction of housing on to the Site will contribute to the creation of a new, genuinely mixed-use neighbourhood and will complement the proposed commercial uses.
- New dwellings will bring new spending and investment to local shops and services generated by future residents.

9) RESIDENTIAL INSTITUTION

Policy Context

National Policy

6.3.180. The NPPF sets a clear objective of "*significantly boosting the supply of homes*".

6.3.181. Paragraph 59 states that it is important "*that the needs of groups with specific housing requirements are addressed*".

6.3.182. Paragraph 61 identifies that within this context, housing is needed for different groups of the community which should be assessed and reflected in planning policies.

Regional Policy

- 6.3.183. London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, residential institutions, whether that be in the form of residential care homes, nursing homes, residential colleges, hospitals or training centres, all contribute to meeting London's housing need.
- 6.3.184. For example, paragraph 4.1.9 of the London Plan explains that "*Net non-self-contained accommodation for older people (C2 Use Class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home. All other net non-self-contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home*".

Local Planning Policy

- 6.3.185. Policy H6 of the LBC Local Plan relates to housing choice, with an aim to seek a variety of housing suitable for LBC's existing and future households. This includes housing for older people, people with disabilities and service families amongst others.
- 6.3.186. There is an expectation that sites over 0.5ha in size will make a contribution to particular housing needs in addition to traditional C3 self-contained housing. There is an emphasis on provision of serviced plots for people wishing to build their own homes, however Policy H6 states that the particular housing needs may be met through inclusion of housing for older people or vulnerable people, student housing, or other housing with shared facilities.
- 6.3.187. Policy H8 of the LBC Local Plan specifically relates to housing for older people, homeless and vulnerable people, aiming to ensure that there is a sufficient supply of housing for such people.

Assessment of the Development

- 6.3.188. Planning permission is sought for a maximum of 8,000 sq m GEA of residential institution use (Use Class C2).
- 6.3.189. The residential institution will complement the healthcare use and allow for an element of specialist accommodation to be delivered if it aligns with the healthcare use as it is developed at the RMA stage. This floorspace also allows for alternative types of housing to come forward alongside the traditional C3 including extra care or alternative typologies that would complement the housing mix. This provision aligns with feedback

from LBC's housing officers seeking opportunities to provide specialist housing and complements the healthcare use by potentially enabling it to have overnight stay.

6.3.190. Flexibility is being sought due to ongoing and future discussions with potential occupiers for the floorspace.

Principle of Residential Institution Floorspace – Summary

- The masterplan provides flexibility for specialist housing to come forward on the Site which would complement the proposed C3 housing as well as the healthcare floorspace and deliver an alternative type of housing.
- At this stage the specific type of C2 use is not yet identified and would be subject to further consideration and discussions with LBC and the public through further consultation at the RMA stage.

6.4. Affordable Housing

6.4.1. This section should be read in conjunction with the accompanying Affordable Housing Statement and Financial Viability Appraisal prepared by DS2.

Policy Context

National Policy

6.4.2. The NPPF seeks to create mixed and balanced communities.

6.4.3. Paragraph 61 outlines that planning policies should specify the type of affordable housing required and expects it to be met on site.

Regional Policy

6.4.4. The London Plan acknowledges at Policy GG4, the Mayor's strategic target of 50% of all new homes being genuinely affordable, based on viability evidence.

6.4.5. Policy H4 specifically relates to affordable housing and specific measures in order to achieve this strategic aim. Whereby all major developments are to provide affordable housing through the threshold approach (Policy H5) and provided on site.

6.4.6. Part A4 of Policy H4 states that a specific measure to achieve this aim is "*public sector land delivering at least 50 per cent affordable housing on each site and public sector*

landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio”.

6.4.7. Supporting text to this policy at paragraph 4.4.7 further states *“Public sector land represents an opportunity to deliver homes that can meet the needs of London’s essential workers who maintain the function and resilience of the city. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site. Public sector landowners with an agreement with the Mayor may provide 50 per cent affordable housing across a portfolio of sites provided at least 35 per cent affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35 per cent.”*

6.4.8. The GLA’s Practice Note on the Threshold Approach to Affordable Housing on Public Land (July 2018) explains how the threshold policy should be applied if only part of the site comprises public land, but not all. In this case, the 35 per cent threshold should apply to the proportion of the site that is not public land (subject to the separate 50% threshold for industrial sites which result in a net loss of industrial capacity). When the site is taken as a whole the overall threshold will be a combination of both thresholds. This will be calculated according to the following formula (site areas to be calculated in square metres):

$$((\text{public land site area} / \text{total site area}) \times 50) + ((\text{private land site area} / \text{total site area}) \times 35)$$

6.4.9. It also states that where only a small proportion of a site is public land and this does not contain a functional building or land use, that the 35% threshold should apply for the whole site. Where sites were disposed of and either have been redeveloped or were subject to a change of use prior to publication of the Mayor’s Affordable Housing and Viability SPG, the 35 per cent affordable housing threshold should apply.

6.4.10. The Mayor’s Affordable Housing and Viability SPG also provides further detail on the Mayor’s expectations surrounding affordable housing delivery on public land. The SPG defines (as does the London Plan) public land for the purposes of this approach as:

“Land that is owned or in use by a public sector organisation, or company or organisation in public ownership or land that has been released from public ownership and on which housing development is proposed.”

6.4.11. The GLA Practice Note ‘Threshold Approach to Affordable Housing on Public Land’ (July 2018), sets out at paragraph 10:

'However, where sites were disposed of and either have been redeveloped or were subject to a change of use prior to publication of the Mayor's Affordable Housing and Viability SPG, the 35 per cent affordable housing threshold should apply.'

- 6.4.12. As detailed below, the part of Site now in private ownership has been subject to a change of use since its disposal and therefore the 35% affordable housing threshold should apply.
- 6.4.13. Policy H5 Part B sets out that the threshold level of affordable housing is a minimum of 35% or 50% for public land or for industrial land where the scheme would result in a net loss of industrial capacity. In order to follow the "Fast Track Route", developments must meet or exceed the relevant threshold without public subsidy, comply with the tenure split set out in Policy H6 (see next section), as well all other planning policy requirements and demonstrate they have taken into account the 50% strategic target and sought grant to increase the level of affordable housing. Where an application does not meet the requirements set out in Part C it must follow the Viability Tested Route.
- 6.4.14. On designated industrial, including LSIS, sites where development proposals would result in a net loss of industrial floorspace capacity defined at London Plan footnote 59 as "either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio, whichever is the greater", developments are expected to provide at least 50% affordable housing to follow the fast track route.
- 6.4.15. Paragraph 4.5.3 of the London Plan advises that affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes.

Local Planning Policy

- 6.4.16. LBC seeks to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31 and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.
- 6.4.17. Policy H4 expects an affordable housing contribution from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sqm GIA or more. A target of 50% affordable housing is expected for developments with a capacity greater than 25 additional dwellings, on site and at a tenure split of 60% social-affordable rented housing and 40% intermediate housing.

- 6.4.18. Paragraph 3.39 of the Local Plan sets out that *“In negotiating the range of housing types and sizes on individual sites, including the proportion and range of affordable housing, the Council will have regard to the characteristics and constraints of the site and the area, progress towards meeting Camden’s overall housing target, the financial viability of the development, the contribution the development makes to the creation of mixed communities, and the Council’s other Local Plan objectives.”*
- 6.4.19. The KTPF supports the priority of affordable housing delivery and the GLA’s target of 50% affordable housing.
- 6.4.20. Draft Policy K1 of the Site Allocations Document supports the substantial number of new homes including genuinely affordable housing.
- 6.4.21. The KTNP and DPNP also look to increase the availability of affordable housing in their neighbourhoods.

Assessment of the Development

- 6.4.22. The Applicant has held interests in the Site for 57 years and throughout that period has acquired the freeholds for the majority of land parcels within the Site. A parcel of land in the centre of the Site measuring approximately 18,922 sqm remains in the ownership of Network Rail. Prior to the Applicant’s acquisition, part of the Site was in use as a railway depot and occupational land associated with the adjacent railways. Throughout its occupation by JMS the entire site has had a variety but associated uses primarily for industrial purposes in support of its specialist engineering and construction operations across London and the UK.
- 6.4.23. Therefore, the general industrial activities over the entire site, whether held freehold or leasehold, are within use classes B2, B8 and E and have been so for a number of decades and are no longer used to serve a public function. In accordance with London Plan H5 and requirements for the ‘Fast Track Route’ for designated industrial sites, the masterplan will provide 65% of the plot ratio as industrial floorspace (40,461sqm). It is therefore considered that the 35% affordable housing target in relation to previous public land applies to the part of the Site owned by the Applicant.
- 6.4.24. Regarding the current split in ownership of the Site the GLA’s Practice Note allows for the affordable housing thresholds to be combined. The calculation for the Site’s threshold is set out below.

- Total site area – 62,288 sqm
- Public land site area – 18,922 sqm
- Private land site area – 42,888 sqm

Practice note calculation

((public land site area / total site area) x 50) + ((private land site area / total site area) x 35)

Calculation applied to application site

$((18,922/62,288) \times 50) + ((42,888/62,288) \times 35) = 15.19 + 24.01 = \mathbf{39.2\% \text{ threshold}}$

- 6.4.25. The application is supported by a Financial Viability Assessment demonstrating that a 35% affordable housing provision by habitable room is in excess of the maximum reasonable quantum of affordable housing that the scheme can viably deliver, due to the significant financial pressures on the site.
- 6.4.26. Despite this and subject to the outcome of ongoing discussions mentioned below, the scheme is committing to provide 35% affordable housing with a policy compliant tenure split of 21% London Affordable Rent and 14% Intermediate Rent in line with LBC Policy H4 and, in recognition of:
- LBC's overall affordable housing policies;
 - The public benefits to the local community that increased on-site affordable housing will provide; and
 - LBC's political aspirations to increase affordable housing delivery.
- 6.4.27. The Applicant's ability to provide 35% affordable housing is subject to ongoing discussions and agreement with LBC relating to the allocation of Community Infrastructure Levy funds and other matters. This provision would result in the minimum provision of 263 dwellings across the masterplan as affordable homes. Mechanisms to secure the delivery of affordable housing alongside the delivery of market housing and as part of the phasing strategy will be secured within the Section 106 Agreement.
- 6.4.28. The Development will deliver a range of affordable housing products including social rented and intermediate housing. The affordable housing will be 'tenure blind', meaning that there will be no outward difference between market and affordable units and will be distributed throughout the residential phases within the Development and throughout the phases of delivery.

- 6.4.29. The approach taken in seeking to deliver the maximum amount of affordable housing, subject to viability across the Site fully accords with all levels of planning policy and will contribute to the creation of a mixed and balanced community.

Affordable Housing – Summary

- The Proposed Development could deliver of a significant quantum of affordable housing on windfall site (minimum of 263 dwellings).
- Affordable housing can be delivered in the first phase of development, ensuring this key community benefit is secured and delivered as early as possible.
- The affordable housing will be provided at both social and intermediate rental levels in order to meet the needs of a range of occupiers.
- The masterplan will meet the requirement to re-provide 65% of the plot ratio as industrial use on this designated LSIS site and will also provide 50% affordable housing on the existing public land.

6.5. Housing Mix

Policy Context

- 6.5.1. The NPPF seeks to create mixed and balanced communities. Within this context, paragraph 61 requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies.

Regional Policy

- 6.5.2. The London Plan seeks to deliver a range of unit types at different price points across London to deliver mixed and inclusive neighbourhoods.
- 6.5.3. Policy H6 outlines that the following affordable product split should be delivered: a minimum of 30% low-cost rented homes, as either London Affordable Rent or Social Rent; a minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership; and the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products based on need.
- 6.5.4. Policy H10 of the London Plan requires LPAs to have regard to a robust evidence of need, whilst considering the nature and location of the site and need to optimise housing potential. Part 6 of Policy 10 outlines that a higher proportion of one and two bed units are generally more appropriate in locations which are closer to a town centre

or station or with higher public transport access and connectivity.

- 6.5.5. Policy H10, Part 9 highlights the particular need for additional family housing and the role of one and two bed units in freeing up existing family housing. Supporting paragraph 4.10.3 notes that *“well designed one and two beds in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development”*. Furthermore paragraph 4.10.4 goes on to state that *“One-bedroom units play a very important role in meeting housing need”* albeit schemes should consist of a range of unit sizes.

Local Planning Policy

- 6.5.6. Policy H6 and Policy H7 of the LBC Local Plan aims to achieve mixed, inclusive and sustainable communities by seeking a range of housing types, whilst having regard to a number of factors including the economics and financial viability of the development and extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing
- 6.5.7. Policy H7 aims to secure a range of homes of different sizes, seeking to ensure that housing developments (a) contribute to meeting the priorities indicated in the ‘Dwelling Size Priorities Table’ based on the findings of the SHMA; and (b) include a mix of large and small homes. The policy does not set a prescriptive dwelling mix which developments must meet but expresses the priority in terms of high, medium or low for number of bedrooms. However, the LBC Housing SPG (2021) provides guidance on a preferred percentage mix which would be a material consideration.
- 6.5.8. Paragraph 3.190 acknowledges that there is a demand for dwellings of every size in the Borough, and the Council *“expect most developments to include some homes that have been given a medium or lower priority level”* but to also *“include some dwellings that meet the high priorities wherever it is practicable to do so”*.
- 6.5.9. Furthermore, Paragraph 3.190 identifies that the Council will give priority to large social-affordable homes (with three or more bedrooms).
- 6.5.10. LBC Planning Guidance on housing currently indicates that the Council will aim for at least 50% of social-affordable rented dwellings in each scheme to be large homes. In addition, with regards to intermediate units, a *“substantial proportion”* of studio and one bed flats are expected in all schemes, a proportion of 2B4P homes where they are *“genuinely suitable for sharers”*, and 3 or more beds will only be supported where they

are “genuinely affordable to target income families and can be included without a reduction in the proportion of social rented homes”.

- 6.5.11. The KTPF supports the ambition for delivering housing choice and mix and Policy H6 for different sizes of homes at section 3.2.3.

Assessment of the Development

- 6.5.12. The development will provide a mix of dwellings which will deliver a diverse range of housing, consistent with all levels of planning policy. The following unit mix is proposed for the Development:

Affordable / Market split		Number of bedrooms (b) Number of bed spaces (p)	1b 1p	1b 2p	2b 3p	2b 4p	3b 5p	4b 6p
35% affordable	21%	Social Affordable Rented	0%	21%	19%	32%	20%	8%
		Hab rooms %	0%	14%	19%	30%	23%	12%
		Floor area %	0%	16%	17%	33%	23%	11%
	14%	Intermediate Rented	7%	49%		44%		
		Hab rooms %	3%	41%		56%		
		Floor area %	5%	44%		52%		
65% market	65%	Market unit %	15%	25%	4%	47%	9%	
		Hab rms %	6%	20%	5%	54%	15%	
		floor area %	9%	21%	4%	54%	12%	

- 6.5.13. In respect of social affordable rented homes, the proposed mix accords with policy by providing the majority of units within the identified high priority sizes, with the provision of 2 and 3-beds represented by 51% and 20% respectively. Provision for 4-beds is made at 8%, with 1-beds accounting for 21% of the total social affordable rented homes. The provision of a greater proportion of 2-beds than indicated in the preferred mix within LBC Housing SPG does not compromise the scheme's contribution to the dwelling priority mix, with the need for 2-beds a high priority. The SPG notes that where it is not possible to provide 50% as large homes, a high proportion of 2b4p homes will be sought, which the proposal seeks to deliver with 32% 2b4p homes.
- 6.5.14. The proposed mix of intermediate homes reflects the high priority for 1-beds, with 56% provision and the medium priority of 2-bed units with 44% provision. The majority of intermediate units are proposed as 1-beds, which reflects its high priority status. The proposed intermediate mix fully meets the dwelling size priority table in the Local Plan and preferred mix in the Housing SPG.

- 6.5.15. The proposed market housing mix prioritises the delivery of 2-bed homes which are identified as high priority, representing 51% of the total market homes. Provision is also made in the scheme for 9% (15% by habitable room) of market homes to be 3-beds. The inclusion of this housing type is in recognition of its high priority for LBC. Collectively the high priority unit types represent 60% of the market homes proposed. Whilst a greater proportion of market 1-bed homes (40% by unit/26% by habitable room) are to be provided when compared with 3-beds, the proposals are policy compliant as they contribute to the delivery of the dwelling size priorities and contribute towards the viability of the scheme and maximise the affordable housing which will be delivered on the Site. A greater proportion of 3-bed units than as proposed would have had a consequential downward effect on the quantum of affordable housing that can be delivered.
- 6.5.16. The need for flexibility to be applied in such circumstances is recognised within Policy H7 and stated in paragraph 3.201 of the Local Plan. The provision of 40% of the market homes as studio/1-beds drives the viability of the scheme as a whole and makes it possible for the social affordable rented and intermediate homes to come forward. Flexibility should therefore be afforded to this aspect of the proposed mix.
- 6.5.17. The indicative masterplan shows that several townhouses are envisaged to come forward on Plot P, with the Design Code requiring low rise development on this Plot. This alternative housing typology is an important aspect of the Development which will provide family-sized homes to meet local need and retain families in the area whilst helping to create a residential character and foster a sense of community within the Development.
- 6.5.18. The Local Plan explicitly states that LBC acknowledge that it will not be appropriate for every development to focus on the higher priorities identified. The proposed mix makes provision for the delivery of units within all of the high priority dwelling sizes and therefore contributes to the creation of mixed and inclusive communities with a mix of both small and large homes proposed. Across all tenures, the high priority dwelling sizes are prioritised and collectively represent the majority of units proposed within each tenure. On balance it is therefore considered to be in compliance with Policy H7.
- 6.5.19. The typology of housing proposed responds to the Site and optimises the quantum of housing to ensure it can deliver an appropriate quantum of housing and make the most efficient use of land. The majority of housing will come forward as flat development in courtyard buildings or point blocks, although as mentioned above provision is made for some traditional townhouses within the site.

Housing Mix – Summary

- New housing within the Proposed Development will provide various types and sizes of dwellings to meet local need through a policy compliant tenure mix.
- Family sized accommodation has been maximised as far as possible and prioritised within the affordable tenures to contribute to the creation of a balanced and mixed community.
- The majority of dwellings will be provided within the identified high priority sizes;
- Townhouses have been specifically incorporated into the Design Code to provide an alternative form of housing which will provide homes with a front door accessible from the street, which will help to create a residential character, retain families in the area and foster a sense of community within the Development.

6.6. Residential Quality

- 6.6.1. This section should be read in conjunction with the supporting DAS prepared by SEW, which includes an Inclusive Design chapter.

Policy Context

National Policy

- 6.6.2. The NPPF places a presumption in favour of high-quality development and which meets the needs of different groups of communities including people with disabilities.
- 6.6.3. Planning policies for housing are required to make use of the Government's optional technical standards for accessible and adaptable housing and nationally described space standards.

Regional Policy

- 6.6.4. London Plan Policy D3 requires developments to optimise capacity through the design led approach, ensuring that development is of the most appropriate form and use for the site.
- 6.6.5. Policy D4 sets out that masterplans and design codes should be used to help bring forward development and ensure it of high-quality design and place-making.
- 6.6.6. Policy D5 supports the creation of inclusive neighbourhoods and achieve the highest standards of accessible and inclusive design.

- 6.6.7. Policy D6 relates to housing quality and standards, requiring developments of all tenures to be of high-quality design and provide adequately sized rooms with comfortable and functional layouts. Dual aspect units and providing sufficient daylight and sunlight is also encouraged.
- 6.6.8. To achieve this, Policy D6 sets out that developments should:
- *Meet the minimum internal space standards (GIA) for new dwellings as outlined in Table 3.1 of the London Plan;*
 - *Maximise dual aspect dwellings;*
 - *Provide sufficient daylight and sunlight to new and surrounding housing;*
 - *Avoid overheating;*
 - *Maximise the usability of outdoor space.*
- 6.6.9. Policy S4 also encourages opportunities to increase play and informal recreation, incorporating accessible play for all ages, recommending 10 square metres of play space per child.

Local Planning Policy

- 6.6.10. Local Plan Policy D1 requires high quality design which integrates well with its surroundings, is inclusive and accessible for all, promotes health, incorporates amenity space and high standards of accommodation. Supporting paragraph 7.32 and 7.33 outlines what the Council will look for to achieve this in line with London Plan Policy D6, including the expectation for residential dwellings to meet the government's nationally described space standard as set out in London Plan and ensure that residential developments have dual aspect with good levels of natural light and ventilation except in exceptional circumstances, amongst other criteria.
- 6.6.11. Policy H6 also requires the same accessible housing requirements as London Plan Policy D7, generally applying the requirement for 10% wheelchair user dwellings across each housing type or tenure in a scheme, seeking 10% of market housing, 10% of social-affordable rented housing and 10% of intermediate housing.
- 6.6.12. Policy A1 seeks to protect quality of life of occupiers and neighbours and requires developments to not cause unacceptable harm to amenity. This includes visual privacy and outlook, sunlight, daylight and overshadowing and environmental considerations.
- 6.6.13. Policy A2 looks to secure new and enhanced open space, applying a standard of 9 sqm per occupant for residential schemes and ensure developments seek opportunities for

providing private amenity space. The Council will also give priority to securing suitable provision of playspace for children and young people and an appropriate level of amenity space for the occupiers of a development.

6.6.14. Further guidance is provided within the LBC Access for All, Design, Planning for Health and Wellbeing, and Public Open Space CPGs.

6.6.15. The KTPF, KTNP and DPNP all support high quality homes that support a diverse local community.

Assessment of the Development

6.6.16. The accompanying DAS by SEW explains the principles which underpin the Design Code and provides more detail about the high-quality residential environment that will be created which has been considered from the outset of the evolution of the design.

6.6.17. The way in which residential Development must come forward will be secured via the Development Specification, the Parameter Plans and the Design Code, which look to maximise the quality of the residential environment through:

- Setting minimum critical distances between buildings to create a high quality environment
- Maximising provision of dual aspect homes and avoiding single facing north aspect homes
- Requiring defensible space to be provided to aid privacy where appropriate
- Requiring windows to be designed to minimise the potential for overlooking
- Requiring external private amenity space to be provided for units
- Setting standards for buildings to be designed to optimise daylight and sunlight receipt and analysis must be undertaken at RMA stage to ensure homes receive good levels of daylight and sunlight
- Securing the delivery of all homes to meet the minimum sizes specified in the Nationally Described Space Standards
- Establishing guidelines as to how homes should be designed to ensure good standards of internal noise can be achieved
- Providing open space and child play space to meet the needs of the Development

6.6.18. All future Development for residential buildings will have regard to the standards and guidelines enshrined within the Design Code which will be adhered to Reserved Matters Application submission.

Housing Quality – Summary

- The proposed Development will secure the provision of up to 825 high quality homes. The proposed Design Code will enshrine good design quality and good design standards into the Development, thereby ensuring that future RMAs for residential plots will have been design to provide high quality homes.

6.7. Density

Policy Context

National Policy

- 6.7.1. Paragraph 122 of the NPPF requires planning policies and decisions to support development that makes efficient use of land, taking into account a range of contextual factors.
- 6.7.2. Section 12 of the NPPF sets out the requirement for developments to achieve well-designed places. The MHCLG National Design Guide outlines that well-designed places can have compact forms of development which make places easily accessible, makes the efficient use of land and optimises density.

Regional Policy

- 6.7.3. London Plan Policy GG2 promotes higher density development in locations that are well connected to jobs, services, infrastructure, amenities by public transport, walking and cycling, applying a design-led approach.
- 6.7.4. This is echoed in Policy D2 and D3 which outlines that density of development should be arrived at through a design-led approach, taking account of the site context and infrastructure capacity and accessibility by way of PTAL and to services.
- 6.7.5. The London Plan defines higher density development as those with a density of at least 350 units per hectares at footnote 28.
- 6.7.6. The GLA's 2016 Housing SPG provides further guidance in relation to calculating densities on mixed use developments at paragraph 1.3.7.1 where schemes have a substantial proportion of non-residential uses (e.g more than 30-35%). Although this guidance relates to the former London Plan density matrix and shouldn't be applied mechanistically, it is clear that it may be more appropriate to undertake an apportionment plot ratio exercise to adjust the site area to reflect the quantum of proposed residential and commercial floorspace.

Local Planning Policy

- 6.7.7. LBC encourage high quality developments with high densities to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of London. Paragraph 2.9 and 3.34 states that the Council will expect the density of housing developments to take account of the London Plan's density matrix – albeit this has since been superseded by the new London Plan which applies a design-led approach towards density as opposed to the former prescriptive matrix, whilst also having regard to the local character including heritage assets.
- 6.7.8. LBC's Design CPG outlines that the density of developments must be designed to respond sensitively to the surrounding area.
- 6.7.9. Section 3.1.6 of the KTPF supports the intensification of the neighbourhood to enable higher density, more efficient industrial buildings. Section 3.1.5 goes on to state that *"development is expected to be high density"* in the area.
- 6.7.10. Draft Site Allocations Document Policy KT1 and KT3 sets out that in order to fully realise its potential, development in Kentish Town and at the Murphy Site must include higher density provision of industry, logistics and other employment uses.
- 6.7.11. KTNP Policy SP2a outlines that existing industrial floorspace should be maintained or increased by better design and greater density of buildings.
- 6.7.12. The DPNP supports LBC's approach to density and identifies the Site as *"one area where some higher rise and higher density development might be appropriate"* at Chapter 9.

Assessment of the Development

- 6.7.13. This Site is currently considered to be underutilised given its existing low-density within an accessible central London location and being identified for high density Development within an area designated for growth.
- 6.7.14. Based on the maximum quantum of residential units proposed (825), the scheme could have a density of c. 350 habitable rooms per hectare or 132 dwellings per hectare on the 6.23 hectare site.
- 6.7.15. Paragraph 3.3.22 of the London Plan requires the following measurements of density per hectare to be provided for all residential applications: 1) number of units, 2) number of habitable rooms, 3) number of bedrooms and 4) number of bedspaces.

Given the outline nature of the application, final figures for these measurements are not yet available. The below represents measurements in line with the minimum quantum (750 dwellings) set out in Section 5.2.6 of the DAS which are as follows:

- 120 units per hectare
- 318 habitable rooms per hectare
- 211 bedrooms per hectare
- 385 bedspaces per hectare

6.7.16. The below represents measurements in line with the maximum quantum (825 dwellings) set out in Section 5.2.6 of the DAS which are as follows:

- 132 units per hectare
- 350 habitable rooms per hectare
- 232 bedrooms per hectare
- 423 bedspaces per hectare

6.7.17. Taking into account of the commercial floorspace in line with the GLA Housing SPG, the residential use of the Illustrative Masterplan accounts for circa 47% of the total Site area and commercial accounts for circa 53%. This equates to a total of 2.93 hectares being used for residential use (752 units), representing a density of 257 units per hectare on a pro-rata basis.

6.7.18. Whilst there is no prescriptive guidance to residential density in light of the newly adopted London Plan which takes a design-led approach as opposed to the former matrix, this is considered appropriate given for the allocated Site which benefits from being well served by public transport and has a good and varied PTAL rating from 1b to 5 and will be easily accessible to both existing and future employment and services in line with London Plan policy objectives for higher density developments.

6.7.19. As demonstrated in the accompanying DAS, the masterplan is design-led, sensitively responding to its wider context. The illustrative residential typologies established for example vary between low-rise town houses and terraces, mansion blocks and larger point, perimeter and linear block, in reference to its surroundings and creating different areas of density across the Site. A key objective of the masterplan is to also create efficient and sustainable commercial floorspace that achieves higher densities in a format that allows for co-location of uses to make the most efficient use of the land whilst maximising open space for the enjoyment of future residents and visitors.

6.7.20. The redevelopment of the Site for higher density development will also achieve wider

planning policy objectives including significantly boosting housing and employment opportunities to meet strategic and local targets, with wide-reaching positive outcomes which are unlikely to be able to be achieved through smaller scale intervention.

- 6.7.21. The proposals are therefore considered an appropriate response to the overarching objective of sustainable development in this location and will comprehensively redevelop the Site to make effective and efficient use of brownfield land in line with strategic and national planning policy. The proposed density will also enable the Development to maximise and make a substantial contribution to regional and local delivery targets and fully realise its potential as identified by both local and neighbourhood planning policies. and represents an opportunity to create a new mixed-use neighbourhood that is distinctive whilst integrated into its local surrounding.

6.8. Design

- 6.8.1. This Section should be read in conjunction with the following supporting documents which provide a detailed analysis of the design principles of the Development:
- Design and Access Statement (“DAS”) prepared by SEW
 - Design Code prepared by SEW
 - Environmental Statement Volume II: Townscape, Visual and Built Heritage Assessment
 - Parameter Plans prepared by SEW

Policy Context

National Policy

- 6.8.2. Section 12 of the NPPF sets out the requirement for developments to achieve well-designed places. This is outlined further in the supporting National Design Guide which looks to achieve *“beautiful, enduring and successful places”*.
- 6.8.3. The NPPF considers that *“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”* at paragraph 124.
- 6.8.4. Paragraph 127 sets out a list of requirements developments must achieve to secure quality, respect heritage, and establish successful and safe places.
- 6.8.5. Paragraph 128 outlines that design should be considered throughout the evolution and assessment of the proposals, encouraging pre-application discussions with the Council

and local community.

- 6.8.6. Paragraph 131 applies “*great weight*” to “*outstanding or innovative design which promotes high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings*”.
- 6.8.7. The MHCLG National Design Guide published January 2021 provides further guidance on how to achieve well-designed places, including built form and well-designed homes and buildings. Successful developments are considered to provide good quality internal and external environments, relate positively to the spaces around them promoting interaction and inclusion and are well integrated into their neighbourhoods. Built form should also be determined by good urban design principles that combine layout, form and scale which responds positively to its context.

Regional Policy

- 6.8.8. The London Plan promotes development of the highest architectural quality. Chapter 3 focuses on policies relating to design.
- 6.8.9. Policy D2 requires the density of development to be proportionate the site's connectivity and accessibility and consider the provision of future planned levels of infrastructure.
- 6.8.10. Policy D3 seeks to optimise site capacity through the design-led approach. Part B promotes higher density developments in locations that are well connected to jobs, infrastructure and amenities by public transport ,walking and cycling. Part D sets out a list of criteria which development proposals should achieve.
- 6.8.11. Policy D4 encourages masterplans and design codes to help bring forward development and ensure it delivers high-quality design and placemaking. At least one Design Review Panel for large schemes which meet the relevant criteria is also required during the pre-application stage.

Local Planning Policy

- 6.8.12. Local Plan Policy D1 requires high quality design which improves the character and quality of an area and the way it functions. The Council expects excellence in architecture and Design. Local Plan Policy D1 also sets out the design criteria for developments of tall buildings.

- 6.8.13. LBC's Design CPG should be read in conjunction with the Local Plan, providing further guidance on local plan design policies. The CPG emphasises LBC's commitment to excellence in design which makes a significant contribution to the success of development.
- 6.8.14. Draft Policy KT1 (Part F) of the Site Allocation Document requires development in Kentish Town to be of high-quality design that respects its context and celebrates local heritage assets.
- 6.8.15. Section 3.1 of the KTPF sets out three key objectives to: create a distinctive new neighbourhood; of exceptional design quality; and incorporate innovative design solutions.
- 6.8.16. Design Policy D3 of the KTNP supports opportunities for high quality design based on an understanding of the site's context and encourages innovation.
- 6.8.17. Chapter 3 of the DPNP promotes excellence in design which reflects local character and historic interest whilst encouraging innovative design and creates individuality. Policy DC3 specifically requires developments to demonstrate good quality design.

Assessment of the Development

- 6.8.18. The importance of place making has been a key driver of the design for the Masterplan. Folgate Estates Ltd's vision for Murphy's Yard will deliver a truly mixed-use scheme that has the potential to complement and enhance Kentish Town, Gospel Oak, and other surrounding areas. The vision for Murphy's Yard is one of a characterful, playful and accommodating place for all; seeking to link existing communities through the provision of exceptional public realm, community space, workspace and a significant number of new homes.
- 6.8.19. The Development has been the subject of extensive pre-application discussions with the Council's Planning and Design Officers and has been reviewed twice by the DRP. The design of the Development and the resulting parameters are the result of extensive review and refinement having been well considered and developed over a number of years, in consultation with LBC, the GLA, the local community and other relevant stakeholders.
- 6.8.20. The role of the Illustrative Masterplan throughout the pre-application period has been as a vehicle for continual testing and seeking to reach consensus with stakeholders, whilst directly informing the Design Code. As such, the proposed masterplan proposed

has been shaped and adjusted to reflect feedback received during the consultation process as summarised in Chapter 3 of the DAS. This included a number of discussions around the careful balance of mix of uses across the Site and the relationship between the residential and commercial floorspace. Iterations of the scheme tested industrial workspace distributed across the ground floors of all plots to intensify industry and create co-location. However, ultimately the commercial and residential neighbourhoods were separated to establish additional housing typologies with lower and stepped heights in the north to respect its Dartmouth Park context and create stronger residential character. In addition to placemaking benefits, this strategy also has functionality benefits allowing for industrial and commercial uses together in the south of the Site with their accompanying servicing requirements largely separate from the residential uses. Further information on the design evolution can be found in the DAS.

- 6.8.21. The Site's ability to provide such a significant quantum of industrial uses is founded on the provision of stacked industrial buildings which allow for multiple level of industrial uses to come forward on a single building footprint. This innovative design will provide flexible and adaptable floorplates to meet the needs of a variety of industrial operators. Benefits in addition to intensifying the industrial floorspace on Site include cost effective systems to reduce rent for tenants, encouraging interaction with its surroundings and spatial efficiencies. The indicative masterplan stacked industry units at plots G and H have been also been developed to operate both individually and a pair for further efficiency opportunities. Further information and case studies on this innovative solution can be found in the supporting DAS.
- 6.8.22. The primarily residential plots within the northerly part of the Site will primarily be flatted development alongside low-rise townhouses, mews and apartments within Plot P. The residential plots will be designed with different building typologies in mind, as set out in the Design Code. The most northerly plots located close to the entrance on Gordon House Road (Plots O & M) and Plot Q in the north-eastern corner will be mansion style buildings, with Plots L & K further into the Site sitting alongside the railway edge proposed as courtyard buildings. In the centre of the Site, Plots J and S will comprise point blocks.
- 6.8.23. The proposed configuration of building typologies and heights responds to the scale of the existing surrounding context and allows the Proposed Development to integrate with the existing built environment. A clear hierarchy of taller buildings along the railway edge and a stepping down towards the surrounding context. The Illustrative Masterplan demonstrates how the use of set-backs and stepping of buildings can successfully create a scheme which positively responds and respects the Site's

surrounding context. The Plot configuration and proposed maximum heights have been organised to frame views of Hampstead Heath from Kentish Town and have been staggered to ensure that a wide aperture is maintained in views towards Hampstead Heath from within the scheme itself.

6.8.24. The Development relates well to the Site's existing context and the overarching ambitions for the wider opportunity area. It is considered to accord with planning policy for the following reasons:

- The Development is legible, permeable and connected to the surrounding context and wider area, opening up the previously enclosed site;
- It has been designed to an appropriate scale and density for its location and in the context of the policy drivers for the Site;
- Delivering exemplar buildings that embrace the history and heritage of the area, as well as the potential of the future; offering sustainable new models of working and living;
- It will provide significant new areas of public open space with green amenity for all to enjoy, joined by green and linkages and routes, delivering a sustainable masterplan which encourages healthy and active lifestyles and maximises urban greening;
- Delivering varied building typologies and responding to tall building opportunities as well as having regard to the LVMF viewing corridor;
- Responding sensitively to and enhancing the existing natural and built context and the existing heritage assets and their settings;
- Incorporating innovative design solutions to maximise the efficiency of the site including the introduction of stacked industry with efficient floorplates and supporting the co-location of uses;
- Creating strong entrance and access points into the Site and new vistas and views;
- The sensitive siting of land uses across the Site, with particular regard to their impact on neighbouring residential communities;

- Setting an overall framework for Development and design to be delivered through a phased approach, ensuring the long-term aims and policy objectives for the Site can be realised.

6.8.25. Overall, the Outline Proposals will deliver high quality design with exemplary place-making governed by adherence to the Design Code which are submitted for approval. As such, the Development is in accordance with all levels of planning policy which seek to secure good design.

Design - Summary

- Creation of a high-quality new neighbourhood of exemplar design and placemaking by award winning architects, Studio Egret West;
- Redevelopment of an existing industrial site to create a more open and legible community with a mix of uses;
- Assurance that a high-quality design will be delivered in the long-term for the outline phases through securing Design Code which will be required to be adhered to and opportunity for further scrutiny and community input at Reserved Matters Stage;
- Sensitive siting of land uses and taller buildings to respect neighbours;
- Retention of the Site's industrial character and locally listed locomotive sheds at the heart of the design.

6.9. Tall Buildings, Townscape and Views

6.9.1. The following section should be read in conjunction with the Townscape Heritage and Visual Impact Assessment (TVIA) prepared by Peter Stewart Consultancy contained within Volume II of the Environmental Statement.

Policy Context

Regional Policy

- 6.9.2. Policy HC3 outlines the importance of strategic and local views and makes reference to the London View Management Framework (LVMF) Guidance.
- 6.9.3. The LVMF designates views from Hampstead Heath to St Paul's Cathedral which cross the fringes of the site to the east and west. Two Assessment Points are identified at the summit, 2A.1 and 2A.2. They are orientated in different directions, although they share the same position: one looks towards St Paul's Cathedral and the other looks towards the Victoria Tower of the Palace of Westminster. The Site is also visible from LVMF

London Panorama View 3A.1 from Kenwood.

- 6.9.4. Policy HC4 of the London Plan requires development proposals to not harm, and make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.
- 6.9.5. Policy D9 defines a 'Tall Building' as a building greater than 6 storeys or 18m and sets out a detailed list of criteria which the proposals should address, relating to visual, functional, environmental and cumulative impacts. These include the visual impact (in long, mid and immediate range views) on strategic and local views and, where possible, remedying any past damage to such views within the townscape.

Local Planning Policy

- 6.9.6. Design Policy D1 of the Local Plan seeks to secure high quality development which preserves local and strategic views. The Council will protect these views in accordance with London Plan policies and LVMF Guidance.
- 6.9.7. Supporting paragraph 7.28 identifies that *"The Council will also consider the impact of a scheme, in terms of the townscape, landscape and skyline, on the whole extent of a view ('panorama'), not just the area in the view corridor"*.
- 6.9.8. Policy D1 also relates to 'tall buildings' defined as *"substantially taller than their neighbours or which significantly change the skyline"*, which are considered sensitive borough-wide and should have particular attention to its surroundings, both streetscape and how it affects the skyline.
- 6.9.9. LBC's Design CPG provides further guidance in relation to tall buildings and sets out that they will be assessed against a range of design issues including how it relates to its surroundings, views, shadowing, historic context and permeability.
- 6.9.10. Part of the Site is located within a 'Protected Corridor' and 'Peripheral Corridor' designated under Policy D1 of the KTNP, from the area adjacent to the station to protect the long green view towards Parliament Hill. Development that takes place within the corridors must be compatible with the view in terms of setting, scale and massing.
- 6.9.11. Section 3.1 of the KTPF advises that developments *"build up to a general height of eight storeys with some buildings going above this in appropriate locations"* although taller buildings will be considered where they help support additional new homes subject to detailed townscape analysis. It also states that *"Buildings above eight storeys will be*

considered tall buildings and will be subject to the additional considerations in Policy D1 of the Local Plan.” Regard should also be had to the topography of the Site and local townscape views into and across the Site.

6.9.12. Draft Policy KT1 Part J requires development proposals to take account of designated and local views, including the view from Hampstead Heath and the view of Hampstead Heath/ Parliament Hill from Kentish Town railway bridge.

6.9.13. The DPNP expects the view to be respected in accordance with the KTNP.

Assessment of the Development

6.9.14. The Proposed Development is likely to appear in the following designated views which have all been assessed in detail in the supporting TVIA, amongst other key views:

- LVMF London Panorama Views 2A.1 and 2B.1 from Parliament Hill;
- LVMF London Panorama View 3A.1 from Kenwood;
- KTNP view corridor from Parliament Hill from the area adjacent to Kentish Town Station.

6.9.15. Throughout the consultation period, the approach to respecting the view from Kentish Town to Parliament Hill was considered in detail. Given the extent of the view itself and peripheral corridors, if development fully maintained the view the developable area on Site would be significantly reduced. The form and massing of the development has been developed in direct response to this view, with lower buildings situated in the middle of the Site beneath the viewing corridor. In addition, the overall site layout has been designed to enable a dynamic view of Parliament Hill, where it is visible throughout the masterplan as one travels along the Heath Line from Kentish Town towards Hampstead Heath. In this way the key area of greenery that the view seeks to protect remains visible and can be experienced, while allowing for the regeneration of this strategically important Site.

6.9.16. The Proposed Development has been designed with consideration of its immediate and wider context, with short, medium and long-distance views throughout the design process. Whilst it is acknowledged that the proposals will be visible to some extent from these designated views, if they were respected in their entirety (i.e. resulting in no visible changes at all) this would preclude any development coming forward that makes the most efficient use of the designated land for regeneration. As such, the proposals have been developed through an iterative design process and considered a number of development options with alternative forms of scale, height and mass in order to find a solution that responds positively to townscape and respect local views.

- 6.9.17. The parameters of the massing and heights of each of the Plots proposed have been established through numerous studies of views from Kentish Town, Parliament Hill, LVMF views and other views that may allow for more direct views towards the Site. Where taller buildings have been positioned in the less visually sensitive location of the Site, nearest the rail intersection and where there is the greatest level change on Site, either side of the viewcone for View 12B. The massing has also been developed to ensure that the view expanse increases as you walk towards the Development in a “re-framed” approach to the KTNP view.
- 6.9.18. The supporting TVIA in Volume II of the ES by Peter Stewart Consultancy considers the visual effects of the Proposed Development on the townscape of the area around the Site, analysing the character of the surrounding townscape, and assesses the likely effect of on views from locations around the Site. Whilst the Development will be prominent from a number of locations and likely to generate strong differences in opinion, the TVIA concludes that the proposals “*will establish a significant and notable new place with distinctive qualities*”, delivering a number of benefits and would result in no adverse effects in relation to townscape and visual impact.
- 6.9.19. The TVIA concludes that the Development would improve the Townscape Character Area (TCA) in which it is located and the effect on all other TCAs including surrounding Conservation Areas, would either be beneficial or neutral. Specifically, there will be a change of minor to moderate magnitude to the Dartmouth Park Conservation Area of medium sensitivity and the effect will be beneficial; and a change of minor magnitude to the Kentish Town Conservation Area of medium sensitivity and the effect will be neutral.
- 6.9.20. The TVIA also acknowledges that the Illustrative Masterplan shows one way in which the Design Code could be applied to provide built form within the maximum parameters. Notwithstanding, the assessment concludes that although smaller in height and with more articulated and broken up massing, it would still largely result in the same magnitude of change in terms of its scale and massing and would result in the same level of change to the assessed receptors, with the exception of Views 4 and 22. For these views, the magnitude of change would reduce but not-significant in both cases. There would also be no additional significant benefits.
- 6.9.21. Furthermore, the Design Code has been carefully set out to provide guidance and controls to ensure that any future scheme would be of high quality in terms of its architectural design, have coherence throughout its massing. Future RMAs will comply with the Design Code, giving clear guidance in relation to the massing and where Development should step down (or up), façade datums, rooflines and materiality of

each plot, ensuring that the resulting scheme will be of high quality.

6.9.22. In addition to the consideration of visual impacts (as detailed above), London Plan policy D9 also requires proposals to address functional and environmental impact. The functional considerations cover elements such as safety, servicing and maintenance, entrances and access routes, and the location of uses within the buildings to maximise regenerative effects. As the proposals are outline in nature, these details are yet to be established and will be formalised through future reserved matters applications. These reserved matters applications will be governed by the Design Code and Parameter Plans which accompany this application and specify, inter alia, the following:

- Vehicular servicing for the northern plots will utilise a two-way service street along the Site's western boundary along the rail edge which will not interfere with the public realm.
- Servicing for the south of the Site will be via access-controlled routes which prioritise pedestrian and cycle movements and which will be landscaped and treated to adhere to the principles of the character areas.
- Entrances must be easily accessible and high visible with consideration given to natural surveillance and overlooking from dwellings and other uses.
- Spill out spaces should be provided alongside active ground floor uses.
- New walking and cycling routes will be provided to accommodate movement through the site.
- Adequate provision must be made for fire safety, both within the buildings themselves as well as for emergency services access into and around the Site.

6.9.23. In addition, the design has been informed by the regenerative potential of the commercial land uses and providing these uses alongside new residential use. The commercial uses will primarily be located in the south of the Site with new connections to Kentish Town town centre and the high street in order to promote connectivity. This part of the Site also safeguards area for future connections, including a new bridge link to Kentish Town, and bridge to Regis Road, and a potential connection to Carkers Lane in order to allow for future connectivity as the area continues to develop, recognising the Proposed Development's potential to be a catalyst for further change in the area.

6.9.24. The Healthy Streets and Transport Assessment which accompanies this application confirms that the existing transport network can accommodate the additional pedestrian, cycle and public transport trips generated by the Proposed Development.

6.9.25. The accompanying Environmental Statement fully assesses the potential impacts of the

Proposed Development on the surrounding area, including in terms of wind, noise, air quality and daylight and sunlight, as well as the cumulative impact of the Proposed Development. These are assessed in detail within this Statement and where necessary mitigation measures have been identified and either included within the proposals or will be secured through other mechanisms including conditions or a S106 agreement.

6.9.26. Camden Local Plan policy D1 requires an assessment of tall buildings against a specific set of criteria. These are set out below alongside a summary of how the Proposed Development addresses these considerations.

Design Consideration	Provision within the Proposed Development
<p>How the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline.</p>	<p>The existing site is largely cut off from the surrounding area and has not developed with the same grain or pattern of the surrounding area. The proposed framework will stitch into the surrounding urban grain and street structure, creating a more porous and inviting street network. New open spaces will complement the surrounding areas of Kentish Town and Gospel Oak, providing generous areas of public open space and green pedestrianised routes linking key transport nodes and local green spaces.</p> <p>The character of the residential neighbourhood in the north of the Site is defined by a tighter knit grain of residential buildings, with massing reflecting familiar domestic typologies, incorporating podiums and stepping down in height towards the Hampstead Heath view corridor.</p> <p>Details of how the surrounding area has informed the Proposed Development and how the proposals incorporate key elements are provided in sections 2.6 and 2.7 of the Design and Access Statement.</p> <p>The accompanying TVIA assess the relationship of the Proposed Development with the skyline from a variety of views in detail. When viewed from the north the Proposed Development intentionally sits below the shoulder of the City Cluster. The appearance of the buildings will be fully detailed at the reserved matters stage in accordance with the controls set out within the Design Code and Parameter Plans to ensure a high quality of architecture that contributes positively to the skyline.</p>
<p>The historic context of the building’s surroundings.</p>	<p>The historic context and heritage within and around the Site have informed the Proposed Development and the Character Areas proposed within the Site respond to the wider and site specific context, recognising the varying influences of the Victorian streets which characterise the local conservation areas, a finer grain historic core around the high street, 20th century redevelopment, and the industry areas to the south of the site.</p>

	Further details are set out in section 2.7 of the Design and Access Statement.
The relationship between the building and hills and views.	<p>The relationship between the Proposed Development and key views, both within the LVMF and local policy, has been a key influence on the layout of the proposed masterplan. The locations of the tallest buildings along the Site's western edge directly respond to the protected view within the KTNP from Kentish Town towards Parliament Hill and the Proposed Development provides for a dynamic view of Parliament Hill which can be experienced as one moves through the masterplan from south to north.</p> <p>The accompanying TVIA assess the relationship of the Proposed Development with the skyline from a variety of views in detail. The appearance of the buildings will be fully detailed at the reserved matters stage in accordance with the controls set out within the Design Code and Parameter Plans to ensure a high quality of architecture that contributes positively to the skyline.</p>
The degree to which the building overshadows public spaces, especially open spaces and watercourses.	The scale and siting of the proposed plots has been informed by technical studies relating to daylight, sunlight and overshadowing. As set out in Chapter 11 of the Environmental Statement, the maximum parameters of the Proposed Development would result in negligible impacts in terms of overshadowing on surrounding open spaces. The Greenwood Centre terraces would experience impacts which would be more noticeable in the spring, but the open spaces retain high levels of sunlight in summer, where the terraces would most likely be in use due to warmer and sunnier days.
The contribution a building makes to pedestrian permeability and improved public accessibility.	The Proposed Development would make a significant contribution to permeability and accessibility through the Site and within the wider area. The Heath Line will provide a new landscaped route linking Kentish Town to Gospel Oak for both pedestrians and cyclists, and introduce permeability through the Site, which has for decades been severed from the surrounding neighbourhoods. Provision is also made to safeguard the potential for additional connections to the Site to come forward, which would further improve permeability and public accessibility.

6.9.27. Overall the Proposed Development will introduce new buildings of high-quality architecture which will result in a significant package of benefits for the local and wider area. Specific details of the design of the tall buildings will continue to be consulted on and refine through the reserved matters applications process which will ensure that the vision of the masterplan is carried through the final design.

Townscape – Summary

- The Proposed Development will establish a significant and notable new place with distinctive qualities, laid out along an attractive new route which provides a direct physical connection between Kentish Town and the Heath along the line of the existing visual connection;
- The impact of the Proposed Development on townscape has been assessed within the accompanying TVIA which concludes that there would be no adverse townscape and visual impact;
- The Proposed Development would improve the character area in which it is located by creating a new neighbourhood and sense of place and the effect on all other character areas will be beneficial or neutral;
- There will be a neutral effect on the Kentish Town Conservation Area and a positive effect on the Dartmouth Park Conservation Area as assessed within the TVIA;
- The Design Code will ensure that any future scheme would be of high quality in terms of its architectural design and have coherence throughout its massing through its controls.

6.10. HERITAGE

- 6.10.1. This section should be read in conjunction with the supporting Built Heritage Statement and Built Heritage Chapter 12 of the Environmental Statement, prepared by RPS providing a detailed assessment of significance of all built heritage assets potentially affected by the proposed redevelopment.

Policy Context

National Policy

- 6.10.2. Section 12 of the NPPF relates to “conserving and enhancing the historic environment”. The NPPF states that applications should describe the heritage assets affected and that when considering a proposed development and its impact on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. Paragraphs 194 – 196 identify the manner in which the proposed development that may impact a designated heritage asset should be assessed and the weighing of the public benefits against any perceived harm.

Regional Policy

- 6.10.3. London Plan Chapter 7 seeks to conserve the historic environment. Policy HC1 specifically requires development to conserve heritage assets and avoid harm.

Local Planning Policy

- 6.10.4. Local Plan Policy D2 outlines that the Council will preserve and where appropriate, enhance Camden's heritage assets and their settings including statutory and locally listed buildings, conservation areas and archaeological remains. The Council will not permit the loss of or substantial harm to a designated heritage asset, unless it can be outweighed by substantial public benefits. Likewise, the effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.
- 6.10.5. LBC's Design CPG provides further guidance in relation to how Policy D2 will be assessed and the importance of conserving the borough's rich heritage, including locally listed buildings.
- 6.10.6. Section 3.1 of the KTPF promotes exceptional design, celebrating its industrial heritage and encouraging new development to stitch heritage assets into the urban fabric. This is echoed in Draft Policy KT1 of the Site Allocations Document.
- 6.10.7. The KTPF also seeks to preserve and enhance the setting of surrounding conservation areas, and views from neighbouring conservation areas.
- 6.10.8. The KTPF identifies that the setting of the Forum and Christ Apostolic church (both Grade II listed) is of particular sensitivity at the southern gateway to the Site, along with the Assembly House and Bull & Gate public houses, and any impact will need to be carefully considered.
- 6.10.9. Furthermore, draft Paragraph 8.47 of the Site Allocations Document "strongly encourages" the retention of the existing locally listed locomotive sheds on site as a key feature of the development.
- 6.10.10. Policy DS2 of the DPNP looks to preserve or enhance the Dartmouth Park Conservation Area, historic buildings and buildings of architectural merit and their setting.
- 6.10.11. The KTNP also supports the protection of Conservation Areas and local heritage assets which are of importance to the local community.

Assessment of the Development

- 6.10.12. The Site is not located in a Conservation Area and does not contain any statutorily listed buildings. However, the former goods railway yard site with origins in the mid-19th

century contains locomotive sheds which are locally listed, or 'Non-Designated Heritage Assets' identified as Shed 2 and Shed 3 in the masterplan. J Murphy & Sons Limited HQ is also locally listed and forms part of this grouping, but not located within the application Site boundary. The remaining buildings within the Site, which date from the twentieth century which are either of very low or nil historic and architectural interest and are not considered to be non-designated heritage assets.

- 6.10.13. The Proposed Development seeks to respect the key features of these buildings and will retain key elements of the locally listed Sheds 2 and 3 on Site with alterations and additions as a key feature of the redevelopment and to provide a new long-term viable use for the buildings. The other buildings will be demolished and replaced with a high-quality development which has been developed to respond to the unique industrial heritage of the Site and successfully integrate with its surroundings.
- 6.10.14. Chapter 12 of the ES assesses the likely significant effects of the proposals on above-ground built heritage assets within and near the site. Taking into consideration embedded mitigation measures, the assessment concludes that the demolition and construction activities will not have significant effects to any built heritage assets or receptors, but will have a permanent 'moderate adverse effect' on the Grade II Christ Apostolic Church as a result of visual impacts to its setting and how it is experienced in views from Fortess Walk and Highgate Road once completed. However, the effects on the other built heritage receptors when the Development is completed and operational would not be significant and no cumulative effects have been identified.
- 6.10.15. The Heritage Statement provides a detailed assessment of the significance of local heritage assets and the impacts of the Proposed Development. The assessment concludes that the proposals will result in a medium adverse impact to the significance of the locally listed sheds on Site and will result in limited degrees of less than substantial harm to the significance of two Grade II listed buildings and the five surrounding conservation areas.
- 6.10.16. The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires decision makers have special regard to the desirability of preserving listed buildings and their settings, and similar provisions are set out for conservation areas where the decision maker is required to give special attention to ensure that Development proposals preserve or enhance the character and appearance of that area. Furthermore paragraph 132 of the NPPF provides that "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the*

heritage asset or development within its setting."

- 6.10.17. Paragraph 196 of the NPPF provides for the concept of "less than substantial harm" to the significance of the heritage asset. In such cases the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. This provision requires the decision maker to assess the impact of the development as a whole on the designated heritage asset in its entirety. The decision maker must weigh up the various components of the scheme and decides whether, as a whole, the proposals enhance or cause net harm. It may be possible for a scheme to have some negative impact on a particular asset but for that to be outweighed by the positive impacts.
- 6.10.18. The Heritage Statement concludes that limited degrees of less than substantial harm will be caused to heritage assets. However, the Proposed Development will deliver a significant package of public benefits, as summarised as set out in Chapter 10 of this Planning and Regeneration Statement.
- 6.10.19. Paragraph 197 of the NPPF states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset. The Heritage Statement concludes that the Proposed Development could have moderate adverse impacts on the locomotive sheds and will lead to the loss of the Oil Processing Plant, which is a non-designated heritage asset of very low significance. These impacts should be weighed against the significance of these assets and the benefits provide through the Development. The heritage benefits, which include the provision of new viable uses for the locally listed buildings and repair and conservation works to better reveal elements of their significance also represent direct benefits to the sheds.

Heritage – Summary

- The Proposed Development will retail and reimagine the locally listed locomotive sheds designed to be at the heart of the scheme.
- New long-term viable uses will be secured within the locally listed sheds and they will form the heart of the site.
- Limited degrees of less than substantial harm are identified to two Grade II listed buildings and the surrounding conservation areas, however, these will be outweighed by the substantial benefits provided through the Proposed Development.

6.11. Open Space, Landscaping and Public Realm

6.11.1. The overall strategy for Open Space, Landscaping and Public Realm are detailed within the DAS, Design Code and Parameter Plan 07. A summary of the proposals is provided in this section.

Policy Context

National Policy

6.11.2. The NPPF supports high-quality developments which are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

6.11.3. The National Design Guide promotes good quality external environments for residential developments, promoting health and wellbeing and social interaction. Both soft and hard landscaping are also identified as an important component of well-designed places so that the built form does not dominate the development or street-scene.

Regional Policy

6.11.4. London Plan Policy D7 requires development to be accessible and inclusive, and incorporate high-quality design, landscaping, planting and street furniture. The policies look to maximise planting and soft landscaping, and the use of public realm to promote pedestrian and cycle activity and discourage travel by car.

6.11.5. Policy D8 requires development to explore opportunities to create new public realm where appropriate, with landscaping treatment of high-quality and incorporating green infrastructure such as trees.

6.11.6. Policy G4 and Policy D1 encourages high quality outdoor spaces and green and open spaces.

6.11.7. The London Plan Policy G5 requires developments to contribute to the greening of London and sets a target Urban Greening Factor (UGF) score of 0.3 for predominantly commercial developments and 0.4 for predominantly residential developments.

6.11.8. Part D of Policy G6 encourages developments to manage impacts on biodiversity and aim to secure net biodiversity gain.

6.11.9. Policy G7 seeks to retain existing trees wherever possible and encourages the planting of additional trees in new developments.

Local Planning Policy

- 6.11.10. Policy A2 looks to secure new and enhanced open space and sets out a standard of 9 sqm per residential occupier and 0.74 sqm per commercial occupier. The Public Open Space CPG outlines that major developments are expected to make a contribution towards the provision of public open space, including play facilities.
- 6.11.11. Policy A3 also promotes the planting of additional trees and vegetation wherever possible. As part of this, Policy CC2 promotes new green infrastructure including biodiverse roads and green walls where appropriate.
- 6.11.12. Policy T1 seeks to improve the pedestrian environment by supporting high quality public realm works that are safe and accessible. The Design CPG recognises that high-quality public realm is a key contributing factor towards creating well-designed places.
- 6.11.13. The KTPF promotes attractive, safe and green open spaces and public realm that is open and accessible to all. The KTPF recognises the benefits of the proposed Heath Line on Site at Section 3.1.2, welcoming a variety of types of open space along the route.
- 6.11.14. Part H of Draft Policy K1 of the Site Allocations Document looks to create high-quality public realm in the area which includes a significant provision of welcoming and safe parks and open spaces for play and social interaction. Part C of Site Allocation Policy K3 requires the redevelopment of the Site to provide a new green connection between Kentish Town and Hampstead Heath and Part G, the provision of substantial new public open space.
- 6.11.15. The KTNP and DPNP both promote the protection and enhancement of open spaces for the health and wellbeing of residents, in addition to improvements to public realm where appropriate to the size, location and nature of the development.

Assessment of the Development

- 6.11.16. The public realm is a key component of the Development and is at the heart of place-making. The open space and landscaping strategy for the Site focusses on the creation of a new public realm, comprising a network of legible, accessible and safe routes and open spaces. It should be noted that whilst the general location of areas of open space are proposed through this application and the general character of such spaces are established through the Design Code, the detailed design of all areas of landscaping are not proposed as part of this application and will be subject to future consideration via submission of RMAs.

- 6.11.17. The provision of 'Gordon Gate' as a newly prominent gateway into the Site from the north, 'Sanderson Gate' a welcoming gateway at the centre of the Site from the west and 'Greenwood Gate' an important arrival space into the new neighbourhood from the south will better stitch the Site into the wider neighbourhood. The gateways are linked by the Heath Line which runs through the entirety of the Site and provides a legible environment for pedestrians and cyclists which is also a green and pleasant space.
- 6.11.18. LBC has sought the provision of the Heath Line within the Development primarily to deliver connectivity and environmental benefits to the existing residents of Kentish Town and the wider area. The delivery of the Heath Line would therefore primarily function as a new piece of strategic infrastructure within Camden. It is important to note that its delivery is not a requirement of any currently adopted policy within the formal Development Plan and is not necessary to make a comprehensive mixed-use redevelopment of the site acceptable in planning terms. The Heath Line has, however, been included in the Development to meet these wider aspirations and discussions have been initiated with LBC in respect of its funding by the use of CIL.
- 6.11.19. The Heath Line will represent a key new route for the local area which will cross the Site from north-west to south-east which will resolve existing severances.
- 6.11.20. New areas of open space surrounding the Heath Line will further activate it and create generous spaces which will provide amenity space for future residents and the existing local community.
- 6.11.21. The Parameter Plans establish the location and general arrangement of routes through the Site and areas of public open space. The Design Code provides detailed guidance on how the public realm should be delivered in terms of appropriate materials and furniture, how character should be created and the types of hard and soft landscaping which will be appropriate across the Site.
- 6.11.22. The routes and open spaces designated as publicly accessible will be provided by and maintained by the Applicant and remain in its ownership and control. In the usual way they will not be dedicated as or create formal public rights of way although it is intended that the planning agreement will set out the obligations on the Applicant to provide access to the public and the basis upon which such access will be granted.
- 6.11.23. The Site is proposed to be designed with six key geographical character areas in mind, with the routes through each character area collectively forming the Healthline. The location of the character areas and different typologies of open space are identified on

the parameter plans and detailed further within the Design Code, which RMAs will need to have regard to.

- 6.11.24. The Gospel Oak Gate Character Area accommodates the Site's northern gateway and will indicate the point of arrival into a high-quality Development with a public square, whilst stitching into the surrounding residential community along Gordon House Road.
- 6.11.25. This Character Area will include 'Health Street North' which is a key residential street which will act as the start of a north-south pedestrian/cycle link which runs through the new residential neighbourhood.
- 6.11.26. The 'Murphy's Mews Character Area sits to the south of the proposed Gospel Oak Gate Character Area and will be characterised by a quiet residential neighbourhood which takes inspiration from Hampstead Heath's woodland in its landscaping strategy to integrate re-wilding into an urban environment. It will incorporate 'Heath Street South' which continues the landscaped pedestrian and cycle route further south into the Site. A second 'Play Street' will also be incorporated between buildings which will be free from vehicles. This area has evolved through pre-application discussions with LBC Officers and the neighbourhood forums, where low rise houses were introduced where additional open space had originally been proposed in order to diversify the types of dwellings across the Site.
- 6.11.27. The 'Heathcliff Character Area' sits towards the centre of the Site and acts as a point of transition between the residential character proposed to the north-east of the Site and the commercial character to the south-east. The significant level changes which occur across the Site will be reconciled within this area with a combination of landscaped stairs and playful ramps embedded into planting and soft landscaping with play features. This will provide a meandering route as part of the Heath Line. An area of open space, to be predominantly hard landscaping to accommodate a range of uses, will be located adjacent the existing profile of railway arches.
- 6.11.28. The 'Engine Depot Character Area' sits further to the east and will surround the historic locomotive sheds. 'Sanderson's Gate' provides a welcoming gateway at the centre of the Site from Sanderson's Close which will feature seating and informal play, whilst facilitating area for vehicular drop offs. 'The Depot' will be a sheltered courtyard through Shed 2 which will provide a direct access route through the building with a garden character. The design of the route will be subject to detailed design and come forward as part of a future RMA. The principle of a route here respects the heritage of the locomotive shed and will open up links across the Site.

- 6.11.29. An elevated pedestrian and cycle route which will sit at first floor level above the Depot will provide further open space and landscaping within the Site. This will lead onto the roofs of Plots A and B.
- 6.11.30. To the west of Shed 3, an area of open space named 'Makers Yard' is proposed which will be capable of accommodating pop-up events. A landscaped route through Shed 3 is also proposed which is known as 'the Arcade'.
- 6.11.31. The 'Murphy's Yard Character Area' includes the 'Upper Sidings' which is the elevated pedestrian and cycle route above Plots A and B which will create a strong sense of openness due to its elevated position and will curate a playful landscape. The proposed raised pedestrian and cycle route will provide a unique route through the public realm which will benefit from good views into the Site.
- 6.11.32. To the south of Plots A and B is 'Murphy's Yard' which is intended as a multi-functional area of open space that enables circulation, amenity and play.
- 6.11.33. The most southerly character area is 'Kentish Town Gateway Character Area' which acts as a gateway into the Site from Greenwood Place. The arrival point, 'Greenwood Gate' will be designed to be safe and exciting and the 'Lower Sidings' mark the beginning of the elevated pedestrian and cycle route that will lead upwards towards the top of Plots A and B.
- 6.11.34. A local square is proposed just beyond the entrance called 'the Landing' which will feature planting and lawn areas.
- 6.11.35. Opportunities for the provision of green roofs on buildings will also be explored for each building and will be proposed wherever practicable. It is also envisaged that residential buildings will be designed to feature podium gardens or roof terraces which will provide further greening and access to open space for new residents, with doorstep play incorporated into residential gardens.
- 6.11.36. Based upon a maximum scenario of the number of residents and workers to be generated by the proposals, a maximum open space provision of 18,004sqm would be required. The proposals include the provision of 21,360 sqm of publicly accessible open space site-wide which is well in excess of the maximum policy requirement when applying the standard set out in LBC Policy A2.
- 6.11.37. The Heath Line, which incorporates an elevated pedestrian and cycle route, is at the heart of the new Development and will act as key circulation routes which realises the policy aspirations for public realm to promote pedestrian and cycle activity and

discourage travel by car. It also accords with the aspirations within Part C of Site Allocation Policy K3 for the Site to provide a new green connection between Kentish Town and Hampstead Heath, and Part G which seeks provision of substantial public open space.

- 6.11.38. The proposal has maximised the opportunities to create new public realm, particularly by seeking to introduce public realm on multi-levels.
- 6.11.39. The Design Code establishes high quality design principles to create safe, accessible and attractive open space which RMAs for public realm proposals must adhere to, as required by policy. The Design Code also sets out illustrative planting palettes which is varied and includes differing typologies such as heathland and modified acid grassland, with the Development providing additional trees and vegetation cover where possible as encouraged by policy.
- 6.11.40. The Design and Access Statement describes and illustrates the principles and core values for the public realm and open space, and private amenity spaces. It is submitted for illustrative purposes only, and the final landscaping design will be subject to future Reserved Matters Applications, with key landscaping principles secured for each proposed Character Area in the Design Code which RMAs must have regard to.
- 6.11.41. In summary, the proposals will deliver benefits to the community through the provision of significant quantum of public open space and landscaped public realm which will be designed to a high quality that people will be able to enjoy. The proposed Heath Line will deliver a green, pleasant and attractive route which will help link Kentish Town to Hampstead Heath and benefit the wider community.

6.12. Biodiversity

- 6.12.1. The following section should be read in conjunction with the supporting DAS by SEW, Ecological Impact Assessment and Biodiversity Net Gain Report by The Ecology Consultancy, and Arboricultural Survey and Arboricultural Impact Assessment by Arbeco.

Policy Context

National Policy

- 6.12.2. Chapter 15 of the NPPF looks to conserve and enhance the natural environment, minimising impacts on and providing net gains for biodiversity. This is supported by the

Draft Environmental Bill which seeks to make it mandatory for developers to submit a Biodiversity Net Gain Plan for planning evidencing a 10% gain in biodiversity.

- 6.12.3. The MHCLG National Design Guide supports rich and varied biodiversity and encourages nature and trees in public open spaces.

Regional Policy

- 6.12.4. The London Plan Policy G5 requires developments to contribute to the greening of London and sets a target Urban Greening Factor (UGF) score of 0.3 for predominantly commercial developments and 0.4 for predominantly residential developments.

- 6.12.5. Part D of Policy G6 encourages developments to manage impacts on biodiversity and aim to secure net biodiversity gain.

- 6.12.6. Policy G7 seeks to retain existing trees wherever possible and encourages the planting of additional trees in new developments.

Local Planning Policy

- 6.12.7. Policy A3 promotes the planting of additional trees and vegetation wherever possible. As part of this, Policy CC2 promotes new green infrastructure including biodiverse roofs and green walls where appropriate.

- 6.12.8. The March 2018 Biodiversity CPG supports Policy A3 and sets out that proposals must demonstrate how biodiversity considerations have been incorporated into the development, how the mitigation hierarchy has been addressed and what positive measures for enhancing biodiversity are planned.

- 6.12.9. It should also be noted that LBC have also produced a Local Biodiversity Action Plan (LBAP), adopted in 2017, which encourages the inclusion of biodiversity to help mitigate the effects of climate change through living roofs, landscaping schemes, gardens, tree planting and urban greening projects.

Assessment of the Development

- 6.12.10. The Site is comprised of industrial buildings and hardstanding. As such, the biodiversity value of the Site as existing is low, calculated at 0.14 total habitat units in the supporting

Biodiversity Net Gain Assessment. Albeit, vegetation and trees can be found around the Site boundary, contributing to the value of linear habitats on Site, calculated as 3.08 total habitat units.

- 6.12.11. The proposals seek to significantly enhance the importance of the Site for biodiversity and provide a biodiversity net gain in line with national, regional and local planning policy objectives, including the LBAP, with new areas of biodiverse green roof, tree planting, woodland glade, rain gardens, flower rich planting, heathland planting, species rich acid grassland, and native hedgerows. In line with the recommendations set out in the supporting Biodiversity Net Gain Assessment, the biodiversity value of the Site as calculated for the Illustrative Masterplan is expected to increase to 8.15 biodiversity units for habitats calculated by area, and 4.09 for linear habitats (hedgerows) as a result. This equates to a net percentage change of 5724.47% by area and 32.86% by linear habitat.
- 6.12.12. Section 6.22.5 of the DAS also calculates the UGF of the Illustrative Masterplan, with the northern quarter (primarily residential area) achieving 0.3 and southern quarter (primarily commercial) achieving 0.19. Whilst not in line with London Plan targets at this stage due to the industrial nature of the scheme and heritage designations preventing green roofs at Sheds 2 and 3, the UFG score still represents a significant increase than the existing position which can be further refined through design development. These scores are also impacted by the various constraints governing development at the site and aspirations to provide alternative housing typologies, including a number of townhouses, which have reduced the available area for green spaces. It should be noted that the UGF can only be estimated at this time as future RMAs will establish the exact proportions of differing types of landscaping which need to be factored into UGF calculations.
- 6.12.13. The Ecological Impact Assessment prepared by The Ecology Consultancy identifies that the Site is not subject to any statutory or non-statutory nature conservation designations, although the presence of bats and breeding birds are present on Site of local importance and features of importance for nature conservation are located adjacent to the Site. The assessment concludes that taking into consideration of the embedded mitigation proposed within the scheme, no significant impacts are expected on any features of importance for nature conservation as a result of the Development at either the construction or operational stage.
- 6.12.14. The supporting Arboricultural Impact Assessment and Survey prepared by Arbeco confirms there are no trees located adjacent to or in the Proposed Development Site subject to a Tree Preservation Order (TPO) or Conservation Area restrictions. Based on

the Illustrative Masterplan, the assessment identifies that a total of 6 individual trees and three partial groups of Category B status will potentially require removal to facilitate development works along with necessary pruning works and potential encroachment into root protection zones. Albeit, final details will be unknown until RMA stage and the detailed design of which will consider the mitigation options and recommendations set out in the supporting Impact Assessment. The illustrative landscaping masterplan also allows for a site-wide range of opportunities for significant tree planting in the new areas of public realm and open space. Further information can be found in Landscaping Section 6 and Tree Planting Section 6.22.4 of the DAS.

6.13. Energy and Sustainability

6.13.1. The following section should be read in conjunction with the supporting Energy Strategy, Sustainability Statement, Circular Economy Statement and Whole Life Carbon Assessment prepared by Hoare Lea.

Policy Context

National Policy

6.13.2. The provision of sustainable development is a key principle of the NPPF, where Chapter 14 requires the planning process to support the transition to a low carbon future.

Regional Policy

6.13.3. London Plan Policy SI 2 require development to minimise carbon emissions through sustainable design and construction, renewable energy, and connection to existing heating networks where possible. Furthermore, development must achieve 35% reduction in target carbon dioxide emissions against building regulations part L 2013 levels. GLA guidance requires the remaining amount for domestic elements to be offset through a cash in lieu contribution to the Council, bringing the total offset to 100%.

6.13.4. Policy SI 3 encourages energy masterplans to be developed for large-scale developments to establish the most effective energy supply options and connections to existing or planned heat networks.

6.13.5. Policy SI 4 requires developments to reduce overheating and reliance on air conditioning systems through sustainable and efficient design, following a hierarchy which prioritises minimising internal heat generation and reduction of heat entering through orientation, fenestration, and insulation.

- 6.13.6. Policy SI 7 looks to reduce waste and support the circular economy outcomes and aim to be net-zero waste, in line with the GLA's Draft Guidance for Circular Economy Statements (October 2020).

Local Planning Policy

- 6.13.7. Policy CC1 requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. To achieve this LBC promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy in line with the London Plan. In turn, Policy CC1 promotes a mix of land uses to minimise the need to travel by car, supports the refurbishment of existing buildings and assess the feasibility of connecting to or establishing a decentralised energy network.
- 6.13.8. Policy CC2 promotes sustainable design and construction measures, meeting relevant environmental standards and accreditations. Part H requires non-residential developments of 500 sqm or more to achieve an "Excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019.
- 6.13.9. The Energy Efficiency and Adaption CPG provides further guidance on how Policies CC1 and CC2 should be applied and requires all development to reduce carbon dioxide emissions by following the energy hierarchy. The CPG identifies the environmental benefits of reusing and refurbishing existing buildings as well as social and heritage value.
- 6.13.10. Draft Policy K1 of the Site Allocations Document promotes the creation of neighbourhoods that is exemplary in terms of sustainability, with the aspiration to be zero carbon.
- 6.13.11. Section 3.4.1 of the KTPF promotes the creation of sustainable neighbourhoods and zero carbon developments through measures such as:
- Methods of construction which prioritise sustainable and low carbon material;
 - Building design that supports low energy use;
 - On site renewable energy;
 - Car free housing;
 - New walking and cycling routes;
 - New trees and open spaces;
 - Supporting social enterprises; and

- Freight consolidation.

6.13.12. The KTNP and DPNP also promote excellence in design which creates sustainable buildings and places.

Assessment of the Development

6.13.13. This outline application is supported by an Energy Strategy for the entirety of the masterplan which outlines how it has been designed to minimise energy use and associated carbon emissions, following the London Plan energy hierarchy, namely:

- **Be Lean:** *High energy efficient building fabric and building services will be utilised to reduce carbon emissions and energy demand through good practice passive design measures.*
- **Be Clean:** *An investigation into the feasibility of connecting to an existing or proposed district network indicates that there are no existing district heating networks within a feasibly distance. However, future proofing of a connection to a district network has been considered.*
- **Be Green:** *A feasibility assessment of integrating low and zero carbon energy systems has been undertaken and concluded that Air Source Heat Pumps (ASHPs) would be the most suitable option for a proportion of domestic hot water demand in addition to suitable roof space being identified for PV panels.*
- **Be Seen:** *The Proposed Development will incorporate effective building monitoring systems to allow energy performance review during operation. This data will be used to report on annual emissions of the Proposed Development throughout its lifetime.*

6.13.14. The Energy Strategy concludes that the proposals have the ability to achieve “over and above” a 35% reduction carbon dioxide emissions beyond the Part L baseline and meet the minimum required carbon reduction at the ‘Be Lean Stage’ in accordance London Plan Policies SI 2, SI3 and SI 4, LBC Policy CC1, the Energy Efficiency and Adaption CPG and aspirations of the KTNP and DPNP.

6.13.15. The likely significant effects of the Proposed Development with respect to climate change, and specifically greenhouse gases (GHG) emissions is also covered in Chapter 12 of the ES. The assessment concludes that the Development will contribute to GHG emissions but will employ commensurate mitigation measures to ensure policy compliance and minimise its contribution to climate change where possible, which is appropriate to the scale and nature of the scheme.

- 6.13.16. Sustainability and designing for longevity, adaptability and maximising use of recycled and renewable materials has also been central to the Proposed Development. As well as retaining existing buildings Shed 2 and Shed 3 and the reuse of existing demolished/dismantled materials on site, the new buildings developed on site will follow best practise principles in their design and construction, as outlined in the supporting Circular Economy and Whole Life Carbon Assessment reports in accordance with London Plan Policy SI 7 and LBC's Energy Efficiency and Adaption CPG .
- 6.13.17. The Sustainability Statement outlines how the proposals seek to achieve the aspiration for it to be an innovative net-zero carbon scheme in line with all levels of planning policy. BREEAM Excellent will also be targeted for the commercial areas of the Development in accordance with LBC Policy CC2.
- 6.13.18. Due to the outline nature of the scheme, the energy consumption and sustainability performance of each of the proposed buildings will continue to progress until the submission of each RMA. Albeit, the supporting documentation confirms that the Proposed Development will be capable of meeting the relevant policy requirements with regards to climate change and achieve net zero carbon for regulated energy consumption via a final carbon offset payment for residual CO2 emissions.

Sustainability Summary

- The proposal is for an accessible and well-connected Development that delivers social value to the wider community.
- The aspiration for the Proposed Development is for it to be an innovative net-zero carbon scheme embedding resilience and longevity in building design.
- It has been demonstrated that the minimum requirement of a 35% reduction in target carbon dioxide emissions against building regulations part L 2013 level can be achieved over and beyond minimum targets.
- The Development will achieve net zero carbon for regulated energy consumption via a final carbon offset payment for residual CO2 emissions.
- The user health and wellbeing are at the centre of design and specification to ensure a comfortable environment is created and make the Proposed Development a place where people want to be and work – both now and in future climates.
- All aspects of the design, construction and operation of the Proposed Development will be developed to have no negative impact on the environment.
- New buildings developed on the site will follow best practise principles in their design and construction with the overarching aims of reducing material usage, minimising waste, and embedding longevity.

- A design approach that prioritises Circular Economy principles and will help to reduce the material impact and waste generated by the built environment.

6.14. Health Impact

Policy Context

National Policy

- 6.14.1. One of the main social objectives of the NPPF is to support strong, vibrant and healthy communities at Chapter 8.

Regional Policy

- 6.14.2. Policy GG3 of the London Plan looks to improve Londoner's health and reduce health inequality. Part D encourages boroughs to assess the potential impacts of the proposals on the mental and physical health and wellbeing of communities through the use of Health Impact Assessments (HIA).

Local Policy

- 6.14.3. Local Plan Policy C1 relates to health and wellbeing, promoting strong, vibrant and healthy communities. Policy C1 A requires development to positively contribute to creating high quality, active, safe and accessible places and Part B requires major developments to be supported by a HIA.

Assessment of the Development

- 6.14.4. As such, a HIA prepared by Volterra is submitted alongside this application in line with the requirements of London Plan Policy GG3 and Local Plan Policy C1.

- 6.14.5. This concludes that whilst there could be adverse effects on access to primary healthcare, the effect of the Proposed Development would have the beneficial effects on population health due to the following factors:

- Increased access to jobs and training during the construction and operational phases;
- Provision of high-quality housing;
- Better access to active travel modes through provision of walking and cycling networks

- Increased access to high-quality open space and better links to Hampstead Heath
- Provision of play spaces.

6.14.6. The Proposed Development makes provision for a significant quantum of healthcare use which could serve to mitigate the potential impacts identified above. Overall, the proposals will result in significant positive health impacts.

6.15. Flooding and Drainage

6.15.1. The following section should be read in conjunction with the Flood Risk Assessment (FRA) and Drainage Report prepared by Arup in support of this planning application.

Policy Context

National Policy

6.15.2. Chapter 14 of the NPPF requires development to take into account the long-term implications of flood risk and directs development away from areas at highest risk.

Regional Policy

6.15.3. Policy SI13 of the London Plan relates to the need to consider flood risk at all stages in the planning process and seeks the appropriate mitigation of surface water run-off through sustainable drainage systems in line with the GLA drainage hierarchy.

Local Planning Policy

6.15.4. Policy CC3 requires that development does not increase flood risk and reduces the risk of flooding where possible.

Assessment of the Development

6.15.5. The Site is located in Flood Zone 1 and therefore low risk with main risk arising from surface water run-off from the Development. Albeit, a FRA and Drainage Report prepared by Arup is submitted in support of the application as the Site exceeds 1 hectare. The FRA concludes that flood risk from tidal/fluvial sources, pluvial sources, groundwater, artificial sources and infrastructure failure are all considered to be low and the Development can be constructed and operated safely not increasing flood risk elsewhere.

6.15.6. The proposed surface water drainage strategy will serve to improve the resilience of

the existing Site to the anticipated changes in rainfall patterns. Blue and green roofs, geo-cellular storage within the public realm and green infrastructure integrated into the landscaping proposals will ensure the site can fully accommodate the 1 in 100-year storm event + 40% without causing flood risk on or off site.

- 6.15.7. The proposals are therefore consistent with the aims of the NPPF, London Plan Policy SI13 and LBC Policy CC3 demonstrating the site is not at increased risk of flooding, provides future resilience to the effects of climate change and demonstrates a sustainable approach consistent with current best practice.

Flooding and Drainage – Summary

- The risk of flooding is low and the Development can be constructed and operated safely without increasing flood risk elsewhere.
- The proposed surface water drainage strategy will further improve the resilience of the Site.

6.16. Transport, Accessibility and Parking

- 6.16.1. The application is supported by a Transport Assessment prepared by Curtins which considers the effects of the Proposed Development in traffic and transport terms including accessibility, trip generation, car and cycle parking, servicing requirements and refuse collection. The Transport Assessment should be referred to for full details on transport; a summary is provided below.

Access and Routes

- 6.16.2. The main points of access into the Site are proposed at Gordon House Road, Sanderson Close and from Greenwood Place. Gordon House Road will feature an improved pedestrian entrance with public square, whilst vehicular access is provided from a new entrance on Gordon House Road.
- 6.16.3. The spatial strategy of the KTPF includes provision of the Heath Line, a new green connection between Hampstead Heath and Kentish Town that prioritises pedestrian and cyclists as a key objective. The Proposed Development has the Heath Line as an integral part of the proposed layout, with provision made for pedestrian and cycle routes which run the length of the Site from the northern end accessed from an improved pedestrian access point on Gordon House Road through to Greenwood Place. The Heath Line will feature an elevated pedestrian and cycle route alongside ground level routes. Space is safeguarded within the Proposed Development to allow for a future pedestrian and cycle bridge link to be provided with direct access from Kentish

Town Road, as shown on Parameter Plan 08.

- 6.16.4. Provision is also made to safeguard a future access into the Site from Carkers Lane, which would help create the 'Makers Lane' from Highgate Studios into the Site as identified as an aspiration in the KTPF. Parameter Plan 08 ensures space is provided between Plot A and B to allow for such a route to be provided in the future.
- 6.16.5. The supporting text to Policy D2 within the KTNP explains that If proposals for Development on only one of the Murphy Site or Regis Road Site come forward then they should be arranged with consideration for a potential linkage across the railway at a future date. This has been incorporated into the proposal, with an area safeguarded to allow for a future bridge link across the railway line to the south which would further develop the Makers Lane.
- 6.16.6. The proposed access and circulation routes prioritise pedestrian and cycles, with vehicle access into the Site limited to operational and servicing vehicles, emergency access and for workers and residents in need of disabled parking. There are no vehicular through routes for general traffic. The Design Code ensures that where public realm is proposed, this will be designed to provide high quality public realm and a pleasant pedestrian environment with opportunity for seating. The Site is also proposed to be permeable to cyclists and cycle routes will be high quality and convenient. The Development adopt the Healthy Streets criteria set out in London Plan Policy T2 which are detailed in the Transport Assessment.
- 6.16.7. Whilst the Design Code establishes minimum widths for routes through the Site, the detailed design of all routes will be subject to consideration through the submission of RMAs.
- 6.16.8. The existing PTAL varies significantly across the site, between 2 in the western part and 5 in the eastern part near Sanderson Close. Following the proposed redevelopment the whole Site would achieve a PTAL of 5 once completed. The proposed access and circulation routes through the Site will have a demonstrable effect on its permeability with links through it greatly improved.
- 6.16.9. In terms of accessibility and promotion of sustainable travel through design, the proposals are in compliance with Local Plan Policy T1 and T3, the Mayors Transport Strategy and London Plan Policy T1 and T2.

Trip Generation

- 6.16.10. The Transport Assessment demonstrates that the traffic generated by the proposed

Development will result in a net reduction in traffic currently generated by the site during both morning and evening peaks. The Proposed Development will reduce the proportion of heavy goods vehicles accessing the Site and thereby using the local transport network when compared against the existing use of the Site.

- 6.16.11. A detailed multi-modal trip generation and distribution exercise has been undertaken to allow the effect of the proposals on the public transport and pedestrian network to be assessed. In addition to bus, underground and rail services, an assessment of gate capacity at Kentish Town Station has been undertaken as detailed within the Transport Assessment.
- 6.16.12. With the provision made for to secure an additional ticket gate at Kentish Town Station, the existing transport network can accommodate the additional pedestrian, cycle and public transport trips generated by the Proposed Development.
- 6.16.13. The capacity of the transport network can therefore accommodate the effects of the Proposed Development, complying with Policy T3 and T4 of the London Plan.

Vehicle Parking

- 6.16.14. The Development Specification sets out the car parking standards which future RMAs must adhere to. The provision of car parking is limited to disabled car parking and essential operating car parking for the proposed industrial uses. The residential Development will be car free and it is acknowledged that on-street parking permits will not be permitted for residents of the new Development. London Plan Policy recognises that operational parking will be considered on a case by case basis and as such there are no maximum standards to assess against. The proposals comply with Local Plan Policy T2 and T6 in respect of car parking provision.
- 6.16.15. All disabled and operational parking, plus servicing bays, will feature electric charging points in accordance with London Plan Policy T6, T6.1 and the Mayor's Transport Strategy.

Cycle Parking

- 6.16.16. The Development Specification sets out the minimum cycle parking standards for each use which future RMAs must adhere to. The cycle parking standards adopted are those set out within the London Plan and are therefore in compliance with Policy T5.

Framework Travel Plan

- 6.16.17. A Framework Travel Plan is submitted which outlines how the Development will

encourage sustainable modes of travel through the construction and operational phases of the Development. It sets target for the travel plan and identifies measures which will be used to promote active travel. The Travel Plan is provided in accordance with London Plan Policy T4.

Delivery and Servicing

6.16.18. A Delivery and Servicing Plan is submitted which has been prepared using TfL's Delivery and Servicing Plan Guidance (December 2020) which detailed Delivery and Servicing Plans, to be prepared for Reserved Matters Applications, will be based upon. The overall objective of this DSP is to provide improvements to procurement practices, supplied management, environmental management procedures, facilities management and safe and legal loading arrangements. The purpose of the Delivery and Servicing Plan is to ensure that servicing arrangements are adequately prepared for and incorporated into the design of future RMAs.

Summary

6.16.19. The Proposed Development is policy compliant in respect of transport and accessibility. The Proposed Development will deliver tangible benefits to the community by accommodating pedestrian and cycle routes through the entirety of the Site to deliver the Heath Line, allowing access from Kentish Town up to Gordon House Road and to Hampstead Heath beyond. The improved accessibility of the Site will increase permeability of the local area. The proposals will lead to a decrease in traffic generated by the Site. The proposals promote sustainable and active modes of travel and enable a shift to electric cars by providing active charging points.

6.16.20. The safeguarding of future routes into the site from Kentish Town Road, Carkers Lane and over the railway line from the Regis Road site ensures the proposals align with aspirations for the wider locale and do not compromise these future opportunities.

6.17. FIRE SAFETY

6.17.1. The following section should be read in conjunction with the Outline Fire Strategy prepared by Elementa in support of this planning application.

Policy Context

Strategic Policy

6.17.2. In the interests of fire safety and to ensure the safety of all building users, Policy D12

of the London Plan seeks to ensure that Proposed Development achieve the highest standards of fire safety.

Assessment of the Development

- 6.17.3. In accordance with Policy D12, an Outline Fire Strategy has been developed to ensure the highest standard of fire safety is designed into the building development at an early stage of design. The report assesses the relevant Building Regulations in addition to Policy D12 and concludes that adequate measures are provided at this stage. A detailed Fire Strategy report will also be provided for each RMA.

6.18. AIR QUALITY

Policy Context

National Policy

- 6.18.1. Paragraph 181 of the NPPF requires planning policies and decisions to improve air quality or mitigate impacts so far as possible and consider all relevant limit values or national objectives for pollutants.

Regional Policy

- 6.18.2. Policy SI1 of the London Plan seeks to improve air quality and for Proposed Development to be air quality neutral. Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach.
- 6.18.3. Part 9 of Design Policy D3 requires proposals to help prevent or mitigate the impacts of poor air quality.
- 6.18.4. Part D of Policy E7 relates to mixed use and residential development on industrial sites, requiring particular consideration to be had with regards to air quality including dust, odour, emissions and potential contamination.

Local Planning Policy

- 6.18.5. Policy CC3 of the Local Plan relates to air quality and requires the impact of development on air quality is mitigated and reduced across the borough.

- 6.18.6. The KTPF looks to support the Kentish Town Healthy Streets Project that seeks to improve the area through a series of transport and street improvements as well as reducing the problem of air quality in the area. Section 3.4 sets out the objective to create a Zero Emission Neighbourhood and 3.4.4 encourages planting trees to improve air quality.

Assessment of the Development

- 6.18.7. Chapter 8 of the ES assesses the key air quality effects during the demolition and construction works and once the Development is completed and operation, considering dust, traffic and existing pollutant sources.
- 6.18.8. In contrast to the existing Site use, no centralised combustion plant is proposed and there will be a reduction in trip rates on local roads as concluded by the Transport Assessment by Curtins. As a result, the assessment concludes that the Development will be “*better than air quality neutral*” in terms of both building and transport emissions in line with London Plan Policy SI1.
- 6.18.9. The assessment also demonstrates that with the adoption of recommended mitigation measures, the residual effects of demolition and construction dust would be ‘not significant’. These will be written into a Construction Environmental Management Plan (CEMP) for each RMA.
- 6.18.10. Overall, the assessment concludes that the Proposed Development is not likely to result in any significant air quality effects and the air quality for future residents would be acceptable in line with all levels of planning policy.

6.19. NOISE AND VIBRATION

Policy Context

National Policy

- 6.19.1. Paragraph 180 of the NPPF requires development to mitigate and reduce the potential adverse impacts resulting from noise from the new development and rise to any significant adverse impacts on health and quality of life.

Regional Policy

- 6.19.2. Policy SD13 of the London Plan relates to the ‘Agent of Change’ which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Part D also

outlines that development proposals should manage noise and other potential nuisances by ensuring good design and exploring mitigation measures.

- 6.19.3. Policy D14 relates to noise and requires development to avoid significant adverse noise impacts on health and quality of life.
- 6.19.4. Part D of Policy E7 relates to mixed use and residential development on industrial sites, requiring particular consideration to be had with regards to agent of change principles (Policy SD13) and vibration and noise.

Local Planning Policy

- 6.19.5. Policy A4 of the Local Plan relates to noise and vibration, requiring it to be controlled and managed having regard to the Council's thresholds set out in Appendix 4.

Assessment of the Development

- 6.19.6. The masterplan has been designed with due regard to agent of change principles and how the existing commercial uses, namely the O2 Forum, relate to the proposed residential units as part of a mixed-use Development. This will also be further considered at RMA stage for each phase as it comes forward.
- 6.19.7. Chapter 9 of the ES assesses the key acoustic and vibration issues during the demolition and construction works and once the Development is completed and operational. The assessments indicate that there will be minor to moderate adverse residual significant effects due to construction works for both noise and vibration. Depending on the proposed construction and demolition programme of the Regis Road Growth Area there is also potential for there to be significant adverse cumulative effect, although no planning application for its redevelopment has been submitted to date so may not coincide. Albeit, any adverse effects during the construction and demolition works will be temporary and limited in geographic extent.
- 6.19.8. When in operation, the building services plant noise limits for the Development have been set to achieve a negligible effect in line with LBC's thresholds. Overall, the assessments do not indicate any permanent significant effects as a result of the completed Development and cumulative schemes due to their distance from the Site.
- 6.19.9. Good industry standards, guidance and practice procedures will be followed in order to mitigate and minimise noise and vibration effects during construction as outlined in Chapter 9. Suitable façade sound insulation performances will also be provided to allow satisfactory internal noise levels during operation, which will be detailed through future

RMA as the design progresses.

- 6.19.10. Designed to mitigate and reduce the potential adverse impacts resulting from noise, the outline masterplan is therefore in accordance with all levels of planning policy.

6.20. DAYLIGHT, SUNLIGHT, OVERSHADOWING AND SOLAR GLARE

Policy Context

National Policy

- 6.20.1. The NPPF supports high quality developments which make the efficient use of land. Paragraph 123 (c) sets out that when considering applications for housing, LPAs should “*take a flexible approach*” in applying guidance relating to daylight sunlight where they would otherwise inhibit making the efficient use of a site providing acceptable living standards are achieved.

Regional Policy

- 6.20.2. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing under Part D of London Plan Policy D6.

Local Planning Policy

- 6.20.3. Policy A1 of the LBC Local Plan seeks to protect the quality of life of occupiers and neighbours including sunlight, daylight and overshadowing. The 2021 Amenity CPG provides further guidance in relation to this policy and supports the principles set out in the BRE's 'Site layout planning for daylight and sunlight: A guide to good practice'.

Assessment of the Development

- 6.20.4. A number of alternative massing options were explored during the design process and assessed by a daylight sunlight consultant to understand how the effects could be reduced and mitigated, which has informed the illustrative masterplan and parameters proposed.
- 6.20.5. Chapter 11 of the ES assesses the daylight, sunlight, overshadowing and solar glare impacts to sensitive surrounding properties and surrounding amenity areas of the Development, based on the Illustrative Masterplan. Of the 85 existing buildings assessed, 42 buildings (just under 50%) experience little to no impact or retain values in line with BRE Guidelines criteria and are therefore considered to experience a

negligible effect for daylight. For the sunlight assessment, the vast majority of buildings (48 out of 57) assessed will experience little to no impact or retain values in line with BRE Guidelines criteria and are therefore considered to experience a negligible effect.

- 6.20.6. The most significant impacts will be to properties within Meru Close, Hemingway Close and Heathview. It is important to recognise, however, that the existing site is currently very low-rise and covered by a large expanse of car parking, so neighbouring properties currently benefit from an unusual situation in a central London location. Given the KTPF aspirations and the draft site allocation, it is reasonable to expect that Development would come forward at this site and that it would not always remain so low rise.
- 6.20.7. It should be noted that the site is unusually clear and uncharacteristic of an inner urban environment, resulting in high baseline levels of daylight. As such, breaches of the BRE criteria for daylight are to be expected when a meaningful Development of the site comes forward.
- 6.20.8. Whilst there is the potential for isolated changes given the Illustrative Masterplan is smaller in height and extent than the maximum parameters, the assessment considers that the effects on receptors would be similar and would not result in a material difference. Further detail and therefore assessment will also be provided as part of the detailed design at the reserved matters stage.
- 6.20.9. Chapter 11 also assesses the solar glare occurring from reflective building facades at 11 viewpoints from road junctions and 37 from the trainlines. The duration and duration and significant of potential solar reflections will depend on building orientation, façade details including fenestration size and location, balconies and cladding materials. Once a building has been designed in detail for each plot, the relevant RMA will be accompanied by a detailed and quantitative assessment of solar glare to include the mitigation measures considered on a building by building basis.

6.21. WIND AND MICROCLIMATE

Policy Context

Regional Policy

- 6.21.1. Part J of London Plan Policy D8 requires new public realm proposals to ensure that appropriate microclimate considerations including wind.

- 6.21.2. Tall Building Policy D9 requires consideration to be had to environmental impact including wind.

Local Planning Policy

- 6.21.3. Policy A1 and supporting paragraph 6.24 of the Local Plan looks to manage the impact of development including its impacts on microclimate, in recognition large developments can alter the local climate including the flow of air.
- 6.21.4. Supporting paragraph 7.35 also requires applications for tall buildings to be considered alongside microclimate policy considerations.
- 6.21.5. Section 3.1.5 of the KTPF looks to avoid the creation of unwelcoming climates, including the creation of wind conditions that hinders street life.

Assessment of the Development

- 6.21.6. Chapter 11 of the ES assesses the effects of the Proposed Development on the local wind microclimate, focusing on the suitability of wind speeds for the intended usage, in terms of pedestrian comfort and safety. Wind conditions were assessed using the maximum massing parameters of the Proposed Development and devoid of landscaping to assess a worst-case scenario at the site.
- 6.21.7. The assessment concludes that no mitigation measures are required during the demolition and construction phase of the Proposed Development but required for the completed Development. This will be secured at each Reserved Matters stage where details of the landscaping proposals will be confirmed. Notwithstanding, it is expected that the wind conditions on Site will be safe and comfortable for the intended uses with mitigation in place and the residual effects for wind microclimate are likely negligible and not significant.

6.22. ENVIRONMENTAL IMPACTS

- 6.22.1. This application as support by an Environmental Statement ('ES') which assesses the potential environmental impacts associated with the Proposed Development. Following the submission of a Scoping Report on 11 December 2020 and an addendum registered by LBC on 28 April 2021, it was considered that the following topics should be considered as part of the ES:

- Socioeconomics

- Traffic and Transport
- Air Quality
- Noise and Vibration
- Wind Microclimate
- Daylight, Sunlight, Overshadowing and Solar Glare
- Built Heritage
- Greenhouse Gasses
- Townscape and Visual Impact

6.22.2. The topics set out above have been assessed in detail in the accompanying ES. The ES concludes that the design of the Proposed Development has been developed in response to the Site's setting and environmental constraints. Mitigation measures have been identified where necessary to reduce environmental effects, and most of these measures will reduce the Site's potential effects such that they will not be significant. Some significant residual effects will remain after mitigation, including noise and vibration construction effects and operational daylight, sunlight, overshadowing, light pollution and solar glare effects experienced by neighbouring residential properties and amenity areas.

6.22.3. Overall, there are predicted to be a significant number of residual beneficial effects that will remain once the Proposed Development is completed and operational, all of which will contribute to the aspirations for Murphy's Yard and the regeneration of the wider area.

7. REGENERATION STATEMENT

7.1 This Section summarises the economic and regeneration benefits of the Development, demonstrating how its delivery will contribute to and provide a catalyst for the regeneration of the locale.

7.2 The Proposed Development is described in detail in full in Chapter 3 of this Statement. The Proposed Development will encompass a range of different uses across the Site, including the following:

- General Industrial/Storage and Distribution;
- Light Industry;
- Residential, up to 825 new homes;
- Residential Institution;
- Offices;
- Research and development;
- Flexible Commercial including retail, restaurants, sports and leisure, drinking establishments;
- Community; and
- Healthcare

7.3 The Proposed Development is exemplary of urban regeneration, proposed to transform a large brownfield industrial site into a new neighbourhood for people to live, work and play, with active frontages delivering animation to the neighbourhood to be created at Murphy's Yard. It will be a place of activity during both the daytime and night-time, fostering a sense of community and a safe place to be. The public realm will be accessible to people at all times, providing new spaces for the local community to enjoy.

7.4 The Proposed Development will also stimulate economic regeneration, which is meaningful given the scale of the Development, the potential for job creation and benefits which will be felt in the locale.

Vision and Strategy

7.5 The Site presents a unique opportunity to create a new, mixed-use neighbourhood within a central London borough. The context of the surrounding area is varied and includes a range of commercial and residential land uses. The Site is also situated between three railway lines which have historically severed it from the surrounding area, resulting in what is effectively an island site with very little interaction with or contribution to its immediate neighbours.

- 7.6 The geography of the site, however, presents an opportunity to create new connections that will link the adjacent, but historically separated, communities alongside the provision of new commercial and residential floorspace. The result is a new, mixed-use neighbourhood that will provide housing and employment generating floorspace with direct benefits to the local and wider area.
- 7.7 In order to create an exciting and stimulating environment through a combination of interesting spaces, the following placemaking strategies have been applied to the design of the Development:
- Providing key routes throughout the heart of the Site through provision of a multi-level Heath Line which promote walking and cycling;
 - Creating public open spaces along the Heath line for people to enjoy and relax in, and connecting to green spaces;
 - Better integrating the Site with the surrounding neighbourhood by opening up and improving access into the Site, and safeguarding areas for potential further connections;
 - Respecting heritage and maintaining a unique sense of place;
 - Creating a diverse and inclusive residential neighbourhood;
 - Creating a high-quality environment with vibrant and active frontages and stimulating architecture;
 - Creating a critical mass of employment uses to reinforce existing creative and industrial character of the Site and the adjacent Highgate Studios;
 - Framing views of Hampstead Heath from Kentish Town Station and along the Heath line;
 - Mix of supporting uses, and locating complementary functions within walkable distance; and
 - Network of routes and spaces to promote walking and cycling.

Creating a Diverse Business Base

- 7.8 The provision of a significant quantum of commercial floorspace, across differing types of uses, will strengthen the local economy and is a major economic benefit of the Proposed Development. That the commercial uses are provided as part of a mixed-use scheme alongside retail, leisure and Sui Generis uses will ensure the local economy is diversified and the Site caters for a diverse business base.
- 7.9 A key feature of the Proposed Development is the flexibility built into the land use quanta for which approval is sought, which will allow the business floorspace to support and accommodate the types of businesses for which there is demand at the time when the scheme is delivered. It seeks to secure the delivery of minimum quanta of general

- industrial/storage and distribution; light industry and research and development floorspace, as well as retail, leisure and community uses to ensure an appropriate balance.
- 7.10 By securing a minimum quantum of industrial floorspace (40,651 sqm), the re-provision of the quantum of existing industrial floorspace is guaranteed alongside at least a further 21,000 sqm of additional industrial and/or research and development floorspace. The contribution of the existing uses to the economy will therefore not be lost.
- 7.11 The scheme may provide a greater quantum of employment floorspace than the minimum specified for industry, with up to 34,500 sqm office floorspace, 8,150 sqm of general industrial and/or storage and distribution, 36,043 sqm light industrial and 36,000 sqm research and development allowed (subject to the overall cap on non-residential floorspace) for which will support a significant quantum of employment floorspace, thereby facilitating economic growth.
- 7.12 As a large strategic site, Murphy's Yard has the ability to and indeed proposes to accommodate a mix of differing employment uses, such as industrial, office and 'maker space' in one location. The co-location of differing uses on Site will contribute to innovation and the sharing of knowledge between different businesses within proximity to one another.
- 7.13 The proposed typology of floorspace, with light industrial within ground floor units being able to be used by craftspeople and makers to manufacture, display and retail their products on Site, which could be set up in a studio format. The need for light industrial space has grown due to increased demand for bespoke, crafted products. The inclusion of this type of employment floorspace in Murphy's Yard will allow smaller manufacturing businesses who require premises to make, display and retail products to establish themselves within LBC. The provision of multi-storey buildings permitted for industrial use will make efficient use of land and provide space suitable for light industrial uses.
- 7.14 There will be sufficient control and management arrangements in place over the office floorspace to ensure there will be appropriate provision for SMEs and local businesses in the office offer on Site.
- 7.15 Research and development floorspace is also part of the proposed employment uses on site, which if delivered could contribute to the creation of a life sciences hub, which could in turn act as a catalyst for innovation in the Borough. This use has the ability to form an integral part of the wider industrial offer by providing a complementary and supporting use to the light industrial space.
- 7.16 Buildings intended to accommodate office uses will be designed to be able to support businesses of a range of sizes and in particular small and medium enterprises. The flexibility which will be afforded to the design of commercial buildings will ensure they

are capable of providing space for different sizes, typologies and configurations of businesses.

- 7.17 It is particularly envisaged that Murphy's Yard will provide and maintain a stock of premises suitable for a variety of businesses and importantly, providing 'move-on' space for growing enterprises such as those currently within Highgate Studios and those which are priced out of higher value areas such as Kings Cross. This will help ensure that businesses in LBC can thrive and grow whilst remaining within the Borough.
- 7.18 Affordable workspace will be an important part of the scheme, with c. 6% uplift of commercial floorspace expected to be secured as affordable workspace. A sufficient supply of affordable workspace is necessary to facilitate entrepreneurship, as new businesses and start-ups depend upon access to affordable premises for the creation and success of new enterprises. The inclusion of affordable workspace across the Site is a key regeneration benefit for the local economy.
- 7.19 The s106 Agreement to be secured as part of the Development is expected to include provisions regarding the affordable workspace which would ensure it helps small new businesses gain access to workspace. The S106 would secure affordable workspace in a mix of industrial and office space for residents and businesses of LBC and would secure flexible terms and conditions to new businesses which could include:
- The ability to scale up and scale down in unit size within the Development as the need arises
 - To provide space that is ready to lease and has minimal fit out costs
 - To monitor take up of affordable workspace by ethnicity and provide access to this data to Council and key stakeholders as required
 - Additional business support for hard to reach ethnic minority communities that struggle to lease workspace based on monitoring
- 7.20 As part of any lease agreement for affordable workspace the Applicant will want to see a proposal that incorporates:
- Offering newly created jobs initially to local residents first
 - Creating local apprenticeship opportunities
 - Supporting mentoring opportunities for young local residents
 - Supporting local volunteering programmes
 - To pay the London Living Wage

- If a workspace manages the space FM jobs are initially offered to local residents

- 7.21 In addition to the economic regeneration benefits provided directly by the provision of employment premises on Site, the provision of new housing can also have economic regeneration benefits by improving the local labour market and ensuring people with skills and expertise can reside within the Borough, which in turn can attract business to the local area and stimulate economic growth. A shortage of housing can have a negative impact on the ability of businesses to recruit staff from the local area and constrain economic growth. 81% of the population of the Development is estimated to be of working age.
- 7.22 Without a sufficient supply of housing close to sources of employment, the prevalence of long-distance commuting patterns are exacerbated, which can have adverse transport and environmental impacts.

Estimation of Economic Activity

- 7.23 Economic activity will be stimulated by the Proposed Development through the construction phase and operational phases of Development. The presence of construction workers on site throughout demolition and construction, followed by employees on Site once the Development is operational will provide economic activity to the local area due to expenditure of those workers. The economic activity of workers is estimated to be on average between £8 and £14.90 per day. The estimation of average spend per day is based upon a 2005 YouGov survey which found that workers spent an average £6 a day near their place of work, adapted to account for uplift for earnings growth between 2005 and 2020 and higher earnings in London. It is estimated that operational workers at the site would spend on average £12.90 in the local area each day, based on the assumption that 60% of workers would spend this amount across an average of 220 workdays per year, this equates to a spend of £1,590,000 in LBC each year.
- 7.24 The future residents of the Development will also contribute to economic activity through household expenditure. An estimated average weekly expenditure by household spent within London is £319 per week¹. The Camden Retail and Town Centre Study (2013) conducted a market share assessment to estimate households' spending share that takes place within LBC and the borough's total retail capacity. The study found that an estimated 43% of LBC residents' retail expenditure takes place within the borough.

¹ This figure has been estimated through examination of the expenditure categories provided within the ONS 2017-19 Household Expenditure Survey for the London region.

- 7.25 The residential expenditure to be spent in LBC supported by the Proposed Development is estimated by multiplying the average weekly expenditure per household in London by the number of additional households generated. Assuming that the minimum number of homes (750) are delivered and 43% of their household expenditure is within LBC, approximately £5.3 million per year of new residential expenditure could benefit local retailers and businesses. Should the maximum number of homes be provided, this would increase to approximately £5.8 million.
- 7.26 Local businesses and retailers will benefit from the additional worker and household expenditure which will be generated by the Proposed Development.

Supporting Jobs and Participation in Employment

- 7.27 The broad mix and range of uses and activities to be supported and created by the Proposed Development on Site will increase the range of employment opportunities available for residents in search of employment and training opportunities in the local area.
- 7.28 Introducing new uses to the Site will provide more choice regarding employment opportunities in comparison to the opportunities provided by the existing Site. The existing Site supports circa 200 jobs, with the functions of the current site as a plant depot and training centre for J Murphy & Sons planned to move to other premises. There are also short term lets of part of the Site for its use as depots while local construction works are taking place nearby. The loss of these short term uses therefore do not represent a loss of jobs as a result of the Site's redevelopment due to their short-term nature which will cease irrespective of the Site's redevelopment.
- 7.29 With most of the jobs connected to J Murphy & Sons' operations to be relocated, as the plant depot will be relocating to Hemel Hempstead and some of the training facilities to be relocated into the J Murphy and Sons HQ which is located adjacent the Site, the existing jobs on Site will not be lost on a UK level and are unlikely to result in additional unemployment.
- 7.30 The comprehensive redevelopment of the Site for a multitude of different uses will create new job opportunities in sectors such as retail, hospitality, leisure, industry, research and development, healthcare, inter alia. The construction phase of the Development will also create a multitude of jobs in the construction sector.
- 7.31 The completed Development will provide a minimum of 42,761 sqm (GEA) of non-residential floorspace facilitating various employment uses. Based on the minimum employment floorspace that will be delivered by the Proposed Development, and adopting the lowest employment density to flexible uses, the gross direct employment supported by the Proposed Development is estimated at 605 FTEs which is equivalent

to 655 jobs when accounting for a proportion of part-time workers. A breakdown of the jobs by use is provided in Table 8 below.

Table 8 - Direct Employment Supported at Proposed Development based on minimum floorspace

<i>Use</i>	<i>Floorspace (GEA sqm)</i>	<i>Employment Density (m² per FTE)</i>	<i>Measure</i>	<i>FTEs</i>	<i>Jobs</i>
General Industrial and/or Storage and Distribution (B2/B8)	8,150	95	GEA	85	95
Light industry (E(g)(iii))	14,955	47	NIA	240	265
Research and Development (E(g)(ii))	17,356	50	NIA	265	280
Retail and/or commercial (E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis)	700	100	GIA	5	10
Flexible Mixed-Use	1,300	200	GIA	5	10
Community (F1 and/or F2)	300	165	GIA	5	5
Total	42,761			605	655

* GIA estimated as 95% of GEA.

** NIA estimated as 80% of GIA.

Source: Volterra calculations; HAC, 2015. *Employment Density Guide (3rd edition)*; CAG Consultants, 2016. *London Employment Sites Database (Final Report)*; NB: figures may not sum due to rounding

- 7.32 The Proposed Development is expected to support a minimum of 605 FTEs directly on-site, equivalent to 655 jobs after accounting for a proportion of part-time workers.
- 7.33 The Proposed Development seeks permission for a range of floorspace with maximum quantum specified by use. Should the Development deliver the maximum quantum of non-residential floorspace, adopting the lowest employment density to flexible uses, the

gross direct employment which could be supported by the Proposed Development is estimated at 3,290 FTEs which is equivalent to 3,610 jobs when accounting for a proportion of part-time workers. A breakdown of the jobs by use is provided in Table 9 below.

Table 9 - Direct Employment Supported at Proposed Development based on maximum floorspace

<i>Use</i>	<i>Floorspace (GEA sqm)</i>	<i>Employment Density (m² per FTE)</i>	<i>Measure</i>	<i>FTEs</i>	<i>Total Jobs</i>
Residential institution (C2)	8,000	45	GIA	170	205
Office (E(g)(ii))	34,500	13	NIA	2,015	2,170
General Industrial and/or Storage and Distribution (B2/B8)	8,150	36	GIA	215	235
Light Industry (E(g)(iii))	32,311	47	NIA	520	570
Healthcare E(e) and/or sui generis	5,889	45	GIA	140	160
Retail and/or commercial (E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis)	3,650	17.5	NIA	160	190
Flexible Mixed-Use	1,500	17.5	NIA	65	75
Community (F1 and/or F2)	300	165	GIA	5	5
Total (cap on non-residential development)	95,000	0	0	3,290	3,610

* GIA estimated as 95% of GEA.

** NIA estimated as 80% of GIA.

Source: Volterra calculations; HAC, 2015. Employment Density Guide (3rd edition); CAG Consultants, 2016. London Employment Sites Database (Final Report); NB: figures may not sum due to rounding

- 7.34 Once the existing 200 FTE jobs on site are taken into account, the gross additional jobs supported on site equates to 435 jobs (405 FTEs) when assuming the Development will deliver the minimum quantum of employment uses. Should the maximum employment floorspace be delivered, the gross additional jobs is estimated at 3,410 jobs. It is apparent that the Proposed Development will support considerable new job creation across a range of sectors.

- 7.35 During the construction phase of the Development, it is estimated that approximately 4,745 gross job years² would be supported, which equates to an average of 610 construction workers on-site per year. The industry standard assumption is that ten job years of employment are equivalent to one FTE job. Therefore, it is estimated that the Proposed Development would create approximately 475 construction FTEs in LBC.
- 7.36 The increased residential expenditure to be generated by the proposed housing on site is estimated to support an additional 55 FTEs in LBC and 125 FTEs in London. This estimate is based on the average Gross Value Added of consumer services worker in London and taking into account 50% displacement.
- 7.37 The Proposed Development would also create indirect and induced employment through supply chain impacts and worker expenditure. This is estimated to support 40-285 jobs within LBC and 170-1,280 jobs across London.
- 7.38 The net additional jobs supported by the Development in the operation phase is set out in Table 10 below. The net direct employment takes into account the effects of job displacement.

Table 10 - Operational Phase: Net Employment Summary

	LBC		London	
	Minimum jobs	Maximum jobs	Minimum jobs	Maximum jobs
Gross additional	455	3,410	455	3,410
Net direct employment (assuming 17% displacement in the borough and 25% in the region)	380	2,830	345	2,560
Indirect and induced (assuming a 1.1 neighbourhood level multiplier and a 1.5 regional level multiplier figure)	40	285	170	1,280
Induced by residential spending	55	55	125	125
Total	470	3,165	640	3,960

NB: figures may not sum due to rounding

- 7.39 In addition to the creation of jobs, the Proposed Development will contribute to and encourage greater participation in employment through employment and training initiatives. J Murphy & Sons Limited have an existing commitment to developing skills for the workforce of the future, employing graduates and apprentices, acting as ambassadors for STEM (Science, Technology, Engineering and Mathematics), and undertaking quality school engagement. Where possible, JMS recruit locally and play a

² Gross job years have been calculated by dividing the construction cost by the average GVA per worker for construction workers and assuming an average GVA per construction worker of c. £108,000 – in line with the London average. ONS, 2019. Regional gross value added (balanced approach).

part in engaging with traditionally hard to reach groups such as NEET (people not in education, employment or training), returning service personnel, ex-offenders and those new to infrastructure. In the event that JMS undertake construction of the Development, they would look to use both their existing channels and others within the supply chain and local communities to support as many employment opportunities as possible.

7.40 Should another lead contractor be appointed, the Applicant will work closely with the selected contractor/s to facilitate the employment aspirations. The Applicant will work alongside LBC to ensure that training opportunities for local people are committed to in the Development through the use of S106 obligations for apprenticeships and training. The initiatives that will be discussed include:

- Construction (and operational stage) employment with employment and training plan for locals, including:
 - Construction apprenticeships and work experience placements
 - STEAM ambassadors
 - Engagement with local schools
 - Local recruitment
 - Local Procurement Strategy for construction stage supply chain (to include targeting high ratio of SMEs).
 - Construction Charter
- Commitment to working with end users to achieve the following aspirations:
 - Advertise vacancies in partnership with Good Work Camden, Gospel Oak Job Hub, and other relevant local employment organisations.
 - Promote employee mentoring and volunteering within Camden
 - Attendance at job fairs to promote opportunities to locals
 - Working with Gospel Oak Job Hub, to support employment opportunities - e.g. supported internships
 - Commitment to working with Camden's Inclusive Business agenda to improve recruitment practices and address labour market inequalities.
 - Support the objectives of the Camden STEAM Commission in raising young people's ambitions

- Link businesses to corporate volunteering opportunities, with local schools, community groups etc.
- Ensuring local people benefit from roles coming forward by targeting local labour in the end-use phase, arrangements to share vacancies with Camden before going externally, facility to support recruitment on the Development

7.41 The Applicant is also committed to collaboration and partnership with local groups to secure construction and operational stage employment opportunities. The following initiatives/actions are expected to be achieved through such partnership:

- Space on site for a job hub and brokerage service
- Promote initiatives for new businesses on site to provide corporate volunteering opportunities to support local people into work.
- Promote initiatives for new businesses on site to provide information/briefings on their businesses, what they do, what skills they look for to give local people an understanding of what they do to break down barriers for local people to have the confidence and understanding of what roles entail.
- On site companies to input into future skills forecasting to enable local people to be equipped and qualified for future roles.
- Promote work experience and internships with the new businesses on site.

7.42 There is also a commitment to working with end users to achieve the following aspirations:

- Advertise vacancies in partnership with Good Work Camden, Gospel Oak Job Hub, and other relevant local employment organisations.
- Promote employee mentoring and volunteering within Camden
- Attendance at job fairs to promote opportunities to locals
- Working with Gospel Oak Job Hub, to support employment opportunities - e.g. supported internships
- Commitment to working with Camden's Inclusive Business agenda to improve recruitment practices and address labour market inequalities.
- Support the objectives of the Camden STEAM Commission in raising young people's ambitions

- Link businesses to corporate volunteering opportunities, with local schools, community groups etc.
- Ensuring local people benefit from roles coming forward by targeting local labour in the end-use phase, arrangements to share vacancies with Camden before going externally, facility to support recruitment on the Development

Supporting Retail, Leisure and Hospitality Uses

- 7.43 Alongside new commercial and residential floorspace, the Proposed Development also seeks to secure the provision of flexible floorspace for a range of retail, leisure and amenity uses. It is anticipated that through RMAs, the floorspace will be flexibly designed to be able to adapt to and enable the accommodation of a range of retail and leisure uses throughout the lifetime of the Development. Flexible uses are being sought to ensure that the Development is able to respond to evolving market conditions, which is essential for an outline application which will be delivered over a number of years.
- 7.44 A minimum of 1,300 sqm and maximum of 1,500sqm of flexible mixed-use floorspace will be provided which is envisaged as a multi-functional retail, leisure and commercial offer at the ground floor of Shed 2. The uses to be accommodated within Shed 2 will be different to businesses on Kentish Town Road, creating new and diverse reasons for people to visit a revitalised new neighbourhood.
- 7.45 Permission is also sought for a minimum of 700 sqm and up to 3,650 sqm of retail, leisure and commercial space which could accommodate any or a mix of the following uses: retail; cafés, restaurants; indoor sport or recreation; creche/day nurseries; public houses; wine bars; drinking establishments with expanded food provision; hot food takeaways or membership only gyms.
- 7.46 The provision of flexible retail and leisure uses will attract a mix of retailers and operators which would help support both a night-time and daytime economy. A provision of such uses provides spaces for the future residents and workers at the Site, providing space to socialise, shop and participate in leisure activities. The retail and leisure floorspace proposed will also support the everyday needs of the newly created residential community, although the expenditure generated by new residents will be substantially greater than the proposed turnover of the proposed floorspace,
- 7.47 The Commercial Strategy Report submitted alongside this application, provides commentary on the type of occupiers that the scheme will seek to attract. Whilst the occupiers of the Development cannot be known at this stage, Murphy's Yard will primarily seek to provide space for independent retailers and hospitality, providing a complementary offer to Kentish Town Road. A complementary retail and leisure offer at

Murphy's Yard will revitalise the new neighbourhood which will benefit the existing retail offer along the High Street by helping to contribute to its vitality.

Benefit of Community Uses

- 7.48 Community uses could come forward as part of the flexible offer discussed above, and in addition the provision of between 300 - 1,300 sqm of Community floorspace (Use Class F1 and/or F2) across the Site will support the regeneration of the local area by securing space for valuable community facilities. There will be a priority for local organisations to access the community floorspace, which will be co-ordinated subject to a Commercial Management Strategy.
- 7.49 Community facilities helps to enhance the quality of life of residents, provides space where social cohesion can be fostered and by extension contribute to a sense of community. The regeneration effects of community facilities are direct by providing facilities that will directly benefit both future and existing residents of the London Borough of Camden, and particularly those living in close proximity to the Site.

Delivering an appropriate housing offer

- 7.50 The proposed residential mix of the Development is detailed below at Table 11.

Table 11 – Proposed Residential Mix

Affordable / Market split		Number of bedrooms (b) Number of bed spaces (p)	1b 1p	1b 2p	2b 3p	2b 4p	3b 5p	4b 6p
35% affordable	21%	Social Affordable Rented	0%	21%	19%	32%	20%	8%
		Hab rooms %	0%	14%	19%	30%	23%	12%
		Floor area %	0%	16%	17%	33%	23%	11%
	14%	Intermediate Rented	7%	49%		44%		
		Hab rooms %	3%	41%		56%		
		Floor area %	5%	44%		52%		
65% market	65%	Market unit %	15%	25%	4%	47%	9%	
		Hab rms %	6%	20%	5%	54%	15%	
		floor area %	9%	21%	4%	54%	12%	

- 7.51 The Proposed Development seeks permission for a minimum of 750 homes and a maximum of 825 homes. The Proposed Development will deliver 35% of habitable rooms as affordable.
- 7.52 The Proposed Development will deliver a mix of different home types and tenures, offering market sale, affordable rent, and intermediate homes which will cater for the

needs of a wide cross section of society. The inclusion of a mix of tenures and sizes will foster a mixed and balanced community and meet identified need for both market and affordable accommodation in LBC.

- 7.53 Based upon the minimum number of homes, 750, this will contribute 7% of Camden's ten year housing target and will realise the full capacity for housing identified in the draft Site Allocation KT3. The inclusion of housing as part of a mixed-use Development contributes to the regenerative effect of the Development.

Creating a New Neighbourhood with a Sense of Place

- 7.54 Alongside the economic benefits of the proposal generated by the Proposed Development, the redevelopment of the Site itself will regenerate the local area by providing an exciting, thriving new neighbourhood which will be an attractive place to live, work and visit. A high quality public realm and attractive amenity offer can be critical to the economic success of new developments.
- 7.55 The Site will be transformed by the proposals from an unattractive, inaccessible parcel of land which is of limited benefit to existing residents of LBC, to a unique destination with a sense of place that will provide tangible regeneration benefits to the local area.
- 7.56 The proposed mix and quantum of land uses, read alongside Parameter Plan 14 (Key Frontages Plan), ensures the scheme will provide active frontages throughout the centre of the Site, lining the Heath Line with vibrancy and vitality. This will create an exciting, thriving new neighbourhood which a variety of active uses on the ground floor and particularly lining the new routes through the Site.
- 7.57 The proposed stacked industry format, where industrial uses are accommodated as part of a wider mixed use offer rather than siloed will curate a unique sense of place where a multitude of uses will contribute to a dynamic atmosphere of creativity, excitement and innovation.
- 7.58 The sense of place itself that is to be created will in turn attract potential occupiers and further amplify the economic regeneration effects of the scheme.
- 7.59 The entire site will be publicly accessible with pedestrian and cycle routes weaved into the proposed site layout providing through access from Gordon House Road to Greenwood Place. The provision of a significant quantum of attractive open space and beautiful landscaped areas will foster a sense of pride in the neighbourhood for future and existing residents.
- 7.60 Whilst the occupiers of the commercial floorspace proposed cannot be known at this stage, there is a strong desire for Murphy's Yard to primarily accommodate independent

manufacturers and retailers and it is anticipated that a Commercial Management Plan will be developed to set out the vision, principles, target tenant types, prohibited uses and preferred mix of commercial unit sizes alongside a marketing and letting strategy. Translating the overall vision for the commercial aspect of the development into a management plan will help contribute to a successful sense of place and attractiveness of the neighbourhood.

- 7.61 The management of the overall Development in the operational stage is of importance to the Applicant in order to ensure the vision for a safe and secure environment is realised. There will be a dedicated estate management strategy, expected to be secured by condition or s106 obligation, which will ensure the entire estate is maintained appropriately in respect of matters such as cleanliness, safety and maintenance and upkeep of the public realm. Such a strategy will ensure the regenerative benefits of the successful creation of the new neighbourhood continue to be felt well into the future.

Summary of Regeneration Benefits

- 7.62 Whilst the existing Site contributes to the local economy by accommodating an employment use, its benefits to the wider community are limited to the provision of jobs on site and the economic impact of the existing use. The Site is large, inward facing and has little to no physical connection with the surrounding area. The redevelopment of this large brownfield Site represents a hugely important regeneration opportunity, the effects of which will be felt in the wider locale.
- 7.63 The re-provision of employment floorspace on Site ensures that the economic contribution of the existing site will not be lost, however the Proposed Development will deliver so much more than a replacement of employment floorspace and jobs. The transformation of the Site will deliver the following regeneration benefits:
- Job creation during the construction phase.
 - Economic activity generated by additional worker expenditure and residential expenditure in the local area which will support local retailers and businesses.
 - The creation of between 380-2,830 net additional jobs on Site during the operational phase.
 - The support of a further 95-340 jobs through induced and indirect effects.
 - An increased range of job types available at the site, providing greater opportunity for employment.
 - A commitment to employment and training opportunities which will help reduce unemployment.
 - The provision of a diverse commercial offer which can accommodate a broad range of differing businesses.

- Inclusion of affordable workspace which will support entrepreneurship and creation of new enterprises.
- A complementary retail and leisure offer which will benefit existing local businesses through increased footfall.
- The creation of a safe and attractive new neighbourhood, which will be managed to a high standard, where people will want to live, work and visit.
- The provision of a substantial quantum of new housing.
- The provision of new publicly accessible routes through the Site.
- The provision of community facilities which aid social cohesion and the fostering of a sense of community, which will be developed in consultation with local residents.
- The provision of increased open and green space which contributes to health and wellbeing in excess of five acres.

8. PHASING & IMPLEMENTATION

Phasing

- 8.1 An Illustrative Phasing Plan is submitted in support of the application for the Development. It describes the anticipated demolition and construction programme for the Development.
- 8.2 The Development will be split into a number of construction phases, and is anticipated to be built out over a period of approximately 9 years. The anticipated phases are shown in the Illustrative Phasing Plan within the accompanying Design and Access Statement. The phases of Development as they relate to the Illustrative Masterplan as summarised below:
- Phase 1 – Plots C and F
 - Phase 2 – Plots J, S, K and L
 - Phase 3 – Plots I, G, H, Shed 2 and Shed 3
 - Phase 4 – Plots A, B, M, O, P and Q
- 8.3 It is important to note that the phasing programme is indicative at this stage and is subject to change in response to market requirements and economic conditions.
- 8.4 As a result, and as is usual for this type of scheme, the Applicant will require flexibility in terms of the deadlines for the submission of reserved matters for each phase of the Development and will discuss the approach with LBC to agree on appropriate deadlines to be reflected in an appropriate planning condition.

Implementation

- 8.5 The Development comprised within the Outline Proposals will be subject to the submission of reserved matters details for approval which will be required to be in accordance with the Design Code, Development Specification and Parameter Plans.
- 8.6 It is assumed that additional information will be required at the appropriate time in respect of the various phases of the Development, in particular, where the Environmental Statement identifies mitigation measures to ameliorate the effects of the Development. Where appropriate, this would be enforced through planning conditions, a Section 106 Agreement, and any other agreements as required. The scope and scale of these agreements formed part of the pre-application discussions and will continue to be discussed during the determination of the application.

- 8.7 It will be important that the planning conditions and Section 106 obligations allow for the flexibility for the Development to come forward in any particular order. The Environmental Statement includes an anticipated construction sequence, however in view of the length of the Development period this is likely to change.
- 8.8 Implementation of the Development will also be subject to other approvals as necessary, such as Section 278 Highways Agreement, traffic regulation orders and associated consents.

9. PLANNING OBLIGATIONS AND CONDITIONS

- 9.1 There are two Community Infrastructure Levy (CIL) regimes which apply to the Proposed Development on the site - the Mayoral CIL adopted by the Mayor of London, and Borough CIL adopted by London Borough of Camden.
- 9.2 The Mayor formally adopted the MCIL2 charging schedule on 1 April 2019. For development schemes in LBC, the Mayoral CIL will be levied at £80 per sqm of chargeable area for all land uses subject to indexation with the exception of health services and educational uses.
- 9.3 LBC's CIL, which is payable in addition to the Mayoral CIL, became effective on 1 April 2015. LBC's CIL introduces differential charging rates for different land uses, dependent on its location within the borough. A Revised CIL Charging Schedule was brought into effect on 30 October 2020.
- 9.4 LBC's Developer Contributions CPG (March 2019) confirms that CIL will be used to fund a range of local and strategic infrastructure that is needed to support growth and development in the borough. 70 per cent of the Camden Strategic CIL is spent on borough-wide infrastructure to support growth. To date this has been spent on schools and highways. 25 per cent of the Camden CIL will be allocated locally by ward councillors. The spending process is guided by a Local CIL priority lists for each ward. These have been developed by ward members in consultation with their local communities
- 9.5 The KTPF acknowledges that funding to pay for infrastructure will come from a variety of sources including the Community Infrastructure Levy (CIL), planning obligations (where these meet the Statutory Tests set out in Regulation 122 of the CIL regulations) and other sources.
- 9.6 The Council's Infrastructure Funding Statement 2020 includes, inter alia, borough wide pedestrian and cycle infrastructure improvements and the Kentish Town area scheme with the explanation that *"this project will transform the area around Kentish Town Road with a focus on improving road safety, particularly for pedestrians and cyclists. It will also include an extension to the Royal College Street cycle route, to provide a continuous route from Holborn through to Kentish Town, north of Camden Road."* The Strategic Funding List includes provisions for children's services, transport infrastructure (including area based public realm schemes) and health projects.

- 9.7 The Infrastructure List is updated annually before December of that year, so items can be added or removed by the Council. Similarly, the Council can introduce an Infrastructure Payment policy by publishing a document on its website (Reg 73b). At the Examination in Public for the revised charging schedule, LBC officers indicated that the LBC was willing to introduce Infrastructure Payments for strategic sites, which would include Murphy's Yard.
- 9.8 Section 106 obligations can be both financial and non-financial obligations and will be used when there is a requirement to address the impact of a Development and the impact itself cannot be dealt with through a planning condition on the permission.
- 9.9 Regulation 122 (2) of the Community Infrastructure Levy ('CIL') Regulations states that a planning obligation may only constitute a reason for granting planning permission for the Development if the obligation is:
- a. 'Necessary to make the development acceptable in planning terms;
 - b. Directly related to the development; and
 - c. Fairly and reasonably related in scale and kind to the development'.
- 9.10 NPPF paragraph 56 states that planning obligations should only be sought where they meet all of the tests outlined in Regulation 122 of the CIL Regulations.
- 9.11 It is anticipated that an appropriate package of Section 106 ('S106') contributions and planning conditions will be discussed with Officers during the determination period for the planning application. The table below sets out how the provisions might be secured and identifies where direct in-kind provision could be made on site. Provisions set out below are provided without prejudice and have been prepared with reference to the relevant Camden Planning Guidance documents and planning policies. Obligations and conditions are expected to apply on a phased basis, triggered for individual phases when that phase comes forward.

Topic	Summary of Policy Requirement	Provision from the Development	Mechanism
Housing			
Affordable Housing	On-site provision required for developments providing 10 or more residential units. Developments should provide a minimum of	Subject to ongoing discussions relating to the Community Infrastructure Levy, the Proposed Development will provide a minimum of 35% affordable housing.	Direct provision of affordable housing on-site.

	35% of residential Gross Internal Area as affordable housing, subject to viability.		
Wheelchair Accessible Housing	Schemes are required to provide a minimum of 10% wheelchair accessible housing and 90% wheelchair adaptable housing.	90% of the dwellings have been designed to meet the Building Regulation requirements of M4 (2). The remaining 10% are designed to be wheelchair adaptable M4 (3) homes.	Direct provision secured as a planning condition.
Employment			
Employment and Training Strategy	All major developments which will result in an increase of 1,000sqm (GIA) or more of floorspace or a net increase of 10 or more homes will be expected to submit an Employment and Training Strategy which will be secured through a Section 106 agreement.	A framework Employment and Training Strategy has been submitted in support of the planning application and is expected to be secured as a S106 obligation.	Direct provision secured as S106 obligation.
Construction Apprenticeships	Developments of over £3 million in build costs will be required to recruit one construction apprentice through Camden Council, or its nominated partner, for every £3 million of build cost where the length of the project allows. A support fee of £1,700 per apprentice placement will also be payable to the Council. Where a developer fails to provide the apprenticeship placement agreed, a £20,000 fee per apprentice will be payable to facilitate	The Applicant proposes to provide an Employment and Engagement Charter to be secured through the S106 Agreement which will provide the framework for the development and the delivery of bespoke strategies and initiatives to secure quality employment and training opportunities in the construction and operational stage of the development through ongoing dialogue and consultation with local community groups.	Direct provision secured as S106 obligation and potential for financial payment in lieu.

	access to training an employment opportunities elsewhere in the borough.		
Construction Work Experience Placements	The Council will seek to secure one, two-week work experience placement per 20 net additional housing units or 500sqm of net additional employment floorspace. However, the Council will also take into consideration other scheme specific factors when agreeing the appropriate number of placements.	The Applicant proposes to provide an Employment and Engagement Charter to be secured through the S106 Agreement which will provide the framework for the development and the delivery of bespoke strategies and initiatives to secure quality employment and training opportunities in the construction and operational stage of the development through ongoing dialogue and consultation with local community groups.	Direct provision secured as S106 obligation.
Local Recruitment for Construction Related Jobs	The Council expects developers to recruit from Camden's resident population for construction related jobs. Where local recruitment targets as set out in the S106 agreement are not met, a payment in lieu of £3,995 per job target will be payable to allow for the promotion of employment opportunities elsewhere in the borough.	A framework Local Employment and Training Strategy has been submitted in support of the planning application and is expected to be secured as a S106 obligation. The Applicant proposes to provide an Employment and Engagement Charter (as detailed in the accompanying Local Employment and Training Strategy) to be secured through the S106 Agreement which will provide the framework for the development and the delivery of bespoke strategies and initiatives to secure quality employment and training opportunities in the construction and operational stage of the development through ongoing dialogue and consultation with local community groups.	Direct provision secured as S106 obligation and potential for financial payment in lieu.
Employment in Development After Completion	The Council will seek to negotiate a section 106	The Applicant proposes to provide an Employment and Engagement Charter (as	Direct provision of employment and training opportunities

	<p>contribution to be used by the Council's Economic Development service to support initiatives which create and promote employment and training opportunities and to support local procurement initiatives in Camden.</p>	<p>detailed in the accompanying Local Employment and Training Strategy) to be secured through the S106 Agreement which will provide the framework for the development and the delivery of bespoke strategies and initiatives to secure quality employment and training opportunities in the construction and operational stage of the development through ongoing dialogue and consultation with local community groups.</p> <p>Details of the Applicant's commitments are also set out in the Regeneration Statement at Section 7 of this Statement.</p>	<p>secured as S106 obligation.</p>
Local Procurement Code	<p>Developers will also be expected, through a legal agreement, to sign up to the Camden Local Procurement Code where the value of the scheme exceeds £1,000,000.</p>	<p>It is expected that this will be captured as an obligation in the S106 agreement.</p>	<p>Direct provision secured as S106 obligation.</p>
Affordable Workspace	<p>LBC's Employment Sites and Business Premises CPG states that on major development sites outside of Hatton Garden the Council may require the inclusion of affordable workspace to help support small businesses and provide a range of employment opportunities.</p>	<p>Through this planning application the Applicant is committing to provide affordable workspace to be controlled through the S106 to secure the detailed provisions set out in paragraph 6.3.79-82 of this Statement.</p>	<p>Direct provision secured as S106 obligation.</p>
Flexible Business Space	<p>LBC's Employment Sites and Business Premises CPG states that the Council will use planning obligations to secure the provision of flexible business space.</p>	<p>The Applicant is committing to certain controls on the market office floorspace as set out in paragraph 6.3.60 of this Statement.</p>	<p>Direct provision secured as planning condition.</p>

Highways and transport			
Site Specific Transport Measures	<p>LBC's Transport CPG states that measures to mitigate the transport impact will be secured by a Section 106 legal agreement or by planning condition as appropriate.</p> <p>LBC's Amenity CPG states that a CMP will be secured through S106 legal agreement in most cases.</p>	<p>Site specific transport and highway and transport improvements are likely to include:</p> <ul style="list-style-type: none"> - Improvements to the pedestrian and cycling environment and public realm - Safeguarding for future connections, including a bridge to Kentish Town, a bridge to Regis Road and potential connection to Carker's Lane - Wayfinding (e.g. Legible London) - Pedestrian connectivity - Car-free development - Off-site highway works - Travel Plan - Construction Management Plan - Delivery and Servicing Plan - Car Parking Management and Reduction Plan - Approval in Principle - Freight Consolidation Plan 	<p>Potential for combination of direct provision on site, S106 obligations, financial payment in lieu and S278 Agreement.</p>
Public realm			
Open Space	<p>The Council will use Section 106 planning obligations to secure new areas of public open space and off-site financial contributions. This recognises that the size and nature of major schemes, their associated demands on public open space and the needs of occupants can vary substantially. The legal agreement will set out where the new</p>	<p>The Design and Access Statement and Design Code provide significant detail on the open space provision through the proposals, including relevant details of landscaping and the character/intended function of each area.</p> <p>The proposed development will provide the Heath Line, a new landscaped route linking Kentish Town and Gospel Oak through the Site. Delivery of the Heath Line is subject to ongoing</p>	<p>Direct provision on site.</p>

	<p>public open space is to be provided and the amount of any financial contribution to be paid. It will also name any existing open spaces that the development will help to enhance.</p> <p>LBC's Public Open Space CPG requires management plans for all areas of public open space to be secured.</p>	<p>discussions relating to the Community Infrastructure Levy. A temporary Heath Line could be secured for the duration of the construction works after Phase 1 to open up the site and connection between Kentish Town and Gospel Oak as early as possible. Implementation, maintenance and provision for public access to be controlled by S106.</p> <p>A new pedestrian and cycle route in addition to the Heath Line to be secured within the permission as per parameters set out within the control documents, with details coming forward within RMAs as relevant. Implementation, maintenance and provision for public access to be controlled by S106.</p> <p>New open spaces within the development's key Character Areas are detailed within the control documents.</p>	
Sustainability			
Carbon Offset	Mitigation will be sought where schemes do not meet the London Plan carbon dioxide reduction targets.	<p>A bespoke approach to reducing carbon emissions via a zero-carbon approach has been fundamental in the design of the proposed development with key environmental measures including:</p> <ul style="list-style-type: none"> • Reducing embodied carbon with fabric and systems optimised for efficiency • Sustainable travel by maximising and improving local public, private and active transportation measures 	Potential combination of direct provision and financial payment in lieu where required to meet policy requirements.

		<ul style="list-style-type: none"> • Assessment of Whole Life Carbon emissions • Incorporating Passivehaus principles • Maximising BREEAM credits and committing the achieving BREEAM 'Excellent' • Promoting the use of integrated SuDS • Future proofing for potential DHN connection should one come forward. • Provision of renewable energy technologies including air source heat pumps and PV panels. 	
<p>Renewable Energy</p>	<p>LBC's Energy Efficiency and Adaptation CPG states that where appropriate and feasible renewable energy technologies are proposed in a planning application the details and continued maintenance will either be secured by a planning condition or S106 agreement.</p> <p>Details of monitoring equipment and reporting regularity and format can be agreed between the applicant and the Council and will be secured through S106 agreement.</p> <p>BREEAM targets to be secured.</p>	<p>A bespoke approach to reducing carbon emissions via a zero-carbon approach has been fundamental in the design of the proposed development with key environmental measures including:</p> <ul style="list-style-type: none"> • Reducing embodied carbon with fabric and systems optimised for efficiency • Sustainable travel by maximising and improving local public, private and active transportation measures • Assessment of Whole Life Carbon emissions • Incorporating Passivehaus principles • Maximising BREEAM credits and committing to achieving BREEAM 'Excellent' • Promoting the use of integrated SuDS. • Future proofing for potential DHN 	<p>Direct provision of renewable technologies on site. Details to be secured by planning condition.</p> <p>BREEAM targets to be secured by planning condition.</p>

		<p>connection should one come forward.</p> <ul style="list-style-type: none"> • Provision of renewable energy technologies including air source heat pumps and PV panels. 	
Other			
Estate and Commercial Management	<p>Policy A1 within LBC's Local Plan seeks to manage the impact of development, ensuring that amenity impacts are mitigated and that the development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities.</p>	<p>Given the nature of the outline application and length of the build period full operational details are not known at this stage but will be provided as individual phases come forward. It is expected that an estate management strategy will be secured through the S106 Agreement, including:</p> <ul style="list-style-type: none"> • Management structure and team • Recruitment and training principles • Facilities and storage • Service commitments • Security strategy • Cleaning strategy • Waste consolidation • Maintenance details • Landscaping and open space management and maintenance • Branding and signage • Energy management • Health and safety • Traffic and parking control • End user communication • Community liaison 	<p>Direct provision of mitigation secured as planning condition.</p>
Construction Management	<p>Policy A1 within LBC's Local Plan seeks to mitigate construction phase impacts on amenity as a result of development.</p>	<p>The Applicant proposes to provide a Construction Charter which will govern contractors and subcontractors working on site and outline expectations of good construction practice. This can be developed in partnership with community groups and</p>	<p>Direct provision secured by planning condition.</p>

		<p>organisations in order to reflect local concerns and priorities.</p> <p>A Construction Management Plan will also be secured (see above in the Highways and Transport section).</p>	
Microclimate	The council may require a financial contribution to fund off-site measures to attenuate the adverse effects on the environmental conditions of public spaces caused by a development	A bespoke approach to mitigating any microclimate impacts on public spaces has been considered and set out in the Environmental Statement. Bespoke measures for assessing detailed designs and mitigating impacts are expected to be secured through planning condition.	Direct provision of mitigation secured through planning condition.
Contaminated Land	<p>The Council may require a financial contribution for:</p> <ul style="list-style-type: none"> • site investigation and remediation works which would include any measures to prevent hazards arising from future use of the site and the disposal or containment of any contaminants; • for monitoring work following the completion of the development, e.g. measuring gas or water contamination in boreholes or installing permanent monitoring equipment; and/or • a post-development survey to confirm that requisite measures have been implemented successfully. 	Remediation of any contaminated land to be secured as part of any planning permission secured through planning conditions.	Direct provision of mitigation secured through planning condition.
Monitoring or survey work relating to biodiversity and habitats	LBC's Biodiversity CPG states that all mitigations measures will be secured through planning conditions or legal agreement.	Biodiversity improvements will be provided on-site through the proposals and a sitewide nature conservation and biodiversity plan to be provided prior to first works starting, with potential	Direct provision of mitigation to be secured through planning condition.

		for phase by phase updates and details.	
Community Safety	<p>Paragraph 9.42 of the Local Plan states that The Council will seek to ensure that community safety issues associated with proposals are fully addressed. As well as appropriate design measures, the Council will seek financial contributions towards management arrangements, including street wardens, CCTV, town centre management and other community safety schemes through the use of planning conditions and obligations, where appropriate.</p>	<p>It is expected that an Estate Management Plan, including a security strategy, will be secured through planning condition.</p>	<p>Direct provision of mitigation to be secured by planning condition.</p>
Air Quality Monitoring/Mitigation	<p>Local Plan policy CC4 seeks to ensure that development does not harm local air quality and limits exposure to poor air quality.</p> <p>LBC's Air Quality CPG states that planning permission may be granted subject to conditions or a legal agreement to ensure appropriate installation of mitigation measures and on-site monitoring.</p>	<p>The Proposed Development has been designed to include measures that will benefit local air quality, including:</p> <ul style="list-style-type: none"> • provision of heat and power from non-combustion sources to negate the requirement for on-site combustion plant; • setting back of the development buildings from the nearest busy roads; and • designed so that the private vehicle trip generation of the Proposed Development will be lower than the existing use resulting in a net decrease in traffic movements on the local road network. 	<p>Direct provision of mitigation to be secured by planning condition.</p>

Community Facilities	LBC's Community Use, Leisure and Pubs CPG states that on major residential and mixed-use schemes providing 200+ net additional dwellings S106 obligations for community provision will be sought.	The proposed development commits to a minimum provision of 300 sqm of local community (F1 and/or F2) floorspace alongside a minimum of 1,300 sqm of Flexible mixed-use space, which includes a leisure provision and a further 700 sqm of additional retail and commercial space that could include leisure and community uses (e.g. creche nursery/creche, gyms and indoor recreation).	Direct provision to be secured via S106 obligation.
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10. BENEFITS

10.1 As summarised throughout this Planning and Regeneration Statement, the Proposed Development will deliver a substantial amount of public benefits through the provision of a high-quality new neighbourhood that would cater to both existing and new residents. The main benefits of the proposals are summarised below.

- A new diverse and inclusive neighbourhood with a rich mix of uses that complement Kentish Town and its surrounding context.
- Contribution to LBC's housing supply along with a significant quantum of affordable housing through a commitment to deliver a minimum of 750 residential dwellings.
- Provision of a significant quantum of industrial use/workspace coming forward in line with LSIS priorities and local context.
- Job generation linked to the new commercial space (c. 3,610 new jobs), including throughout a long build programme and ultimately as part of the ongoing operation of the site. This will be a wide range of job types across multiple sectors with flexible and adaptable workspaces.
- Economic benefits arising from new local spend, business rates, and council tax.
- Workspace which has been designed for and will support SMEs and a range of businesses, in particular move-on space, as part of a wider business community on site.
- Provision of 3,000 sqm of affordable workspace within the industrial and office uses.
- Significant quantum of open space in excess of five acres on a currently closed site that enhances biodiversity and green infrastructure.
- Improved public realm and new pedestrian and cycle connections across the site including the Heath Line, a key priority connection between Kentish Town and Gospel Oak, and safeguarding for future connections to Regis Road, Carkers Lane and Kentish Town Road.
- Retention of Murphy HQ and long-term stewardship of the Site by an established local presence.

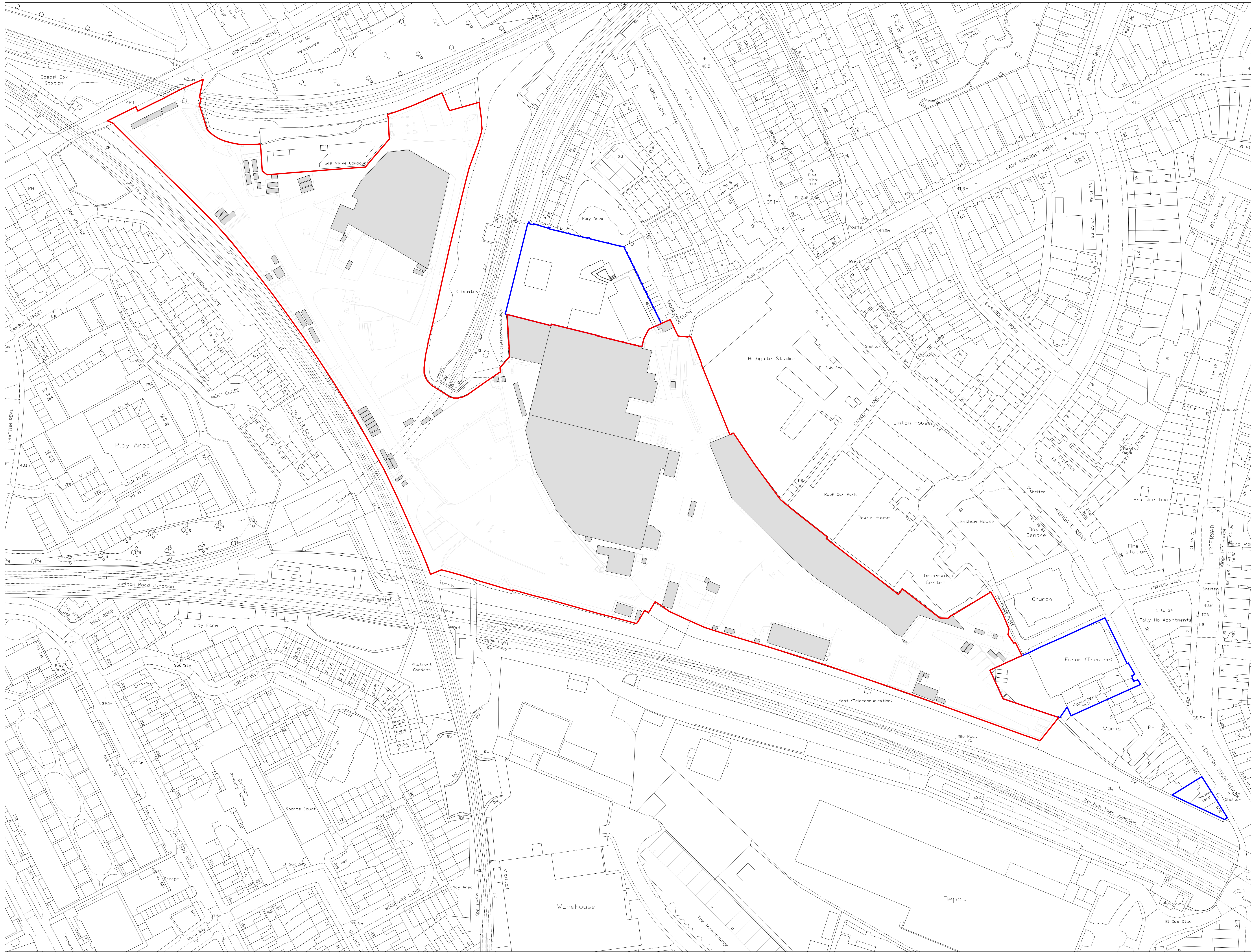
- Sustainable and largely car-free development working to meet local and strategic aspirations for carbon reduction.
- Celebrating the Site's heritage through the retention and enhancement of locally listed railway sheds.
- A phased and flexible scheme with flexibility to meet future market requirements and therefore deliverable and resilient by design.
- Comprehensive package of employment commitments in both the construction and operation stages of the Development to ensure jobs and opportunities for local people.
- Commitment to ongoing dialogue and partnership working with local stakeholders throughout the build and RMA processes.
- A minimum provision of community floorspace alongside a wider provision of locally ground commercial and retail uses.

11. CONCLUSIONS

- 11.1 This Planning Statement has been prepared on behalf of Folgate Estates Ltd in support of an Outline Planning Application with all matters reserved at Murphy's Yard for the comprehensive redevelopment of the Site.
- 11.2 The submitted Development Specification, Design Code and Parameter Plans are submitted for approval and will act as 'Control Documents' which future applications for Reserved Matters must comply with.
- 11.3 This application seeks permission for the demolition, partial demolition and alteration of existing buildings on Site and for redevelopment to provide:
- 750-825 residential units
 - Between 42,761sqm – 95,000sqm (GEA) of non-residential floorspace made up of the following:
 - Up to 8,000sqm C2 floorspace
 - Up to 34,500sqm office floorspace
 - A minimum of 40,641sqm general industrial, storage and distribution, light industry or research and development
 - Up to 16,000 sqm (GEA) of healthcare
 - 700 - 3,650sqm (GEA) of retail, commercial or sui generis space
 - 1,300-1,500sqm (GEA) of flexible mixed-use space
 - 300 -1,300sqm community floorspace.
 - Up to 21,360 sqm of public open space across the 6.23 ha Site.
- 11.4 The application seeks permission for the principle of access points into the Site from Greenwood Place, Sanderson Close and Gordon House Road. The general arrangement of access and circulation routes through the Site are also proposed which include a multi-level pedestrian and cycle route through the Site. The location of zones within which plot development must come forward are proposed to be established and the allowable use classes of each Plot are proposed.
- 11.5 The maximum heights for each Development Plot are proposed and the design guidelines controlling the way in which future buildings should be designed are detailed within the Design Code.
- 11.6 The Proposed Development will come forward with six character areas which incorporate up to 21,360 sqm of public open space.
- 11.7 The Development will be delivered in a sequence of Phases, with the design of each development plot and area of public realm being subject to the submission of future Reserved Matters Applications.

- 11.8 The proposals have evolved over the course of extensive pre-application discussions with LBC and GLA Officers, consultation with local groups and had extensive input from a technical team since 2018.
- 11.9 The Development is of a high architectural quality which has been rigorously tested through an iterative design process and will enhance the appearance and character of the Site whilst being sensitive of its context, industrial designation and views. Furthermore, the proposals maximise the use of this highly sustainable and accessible, brownfield site and retention and re-use of the existing buildings, with further environmental benefits.
- 11.10 The proposed redevelopment is considered compatible for the LSIS, providing an uplift of industrial floorspace and furthering its function, whilst creating a mixed use neighbourhood which supports a range of other uses to create a strong and vibrant new place in line with national, regional and local planning policy objectives.
- 11.11 This planning application is supported by a suite of documents which demonstrate that the Development proposals are in accordance with all matters relevant to planning.
- 11.12 The Proposed Development offers significant and extensive community benefits which are summarised in the preceding section.
- 11.13 As such, the proposals are considered to constitute sustainable development and are in accordance with the development plan. Suitable conditions, CIL and Section 106 Obligations will ensure delivery of the significant benefits offered by the proposals.

APPENDIX 1



General Notes
 The drawing is for the use of the client only. It is not to be used for any other purpose without the written consent of the author. The drawing is not to be used for any other purpose without the written consent of the author. The drawing is not to be used for any other purpose without the written consent of the author.

Notes

- Key:**
- Ownership Boundary
 - Outline Application Boundary
 - Existing buildings

Rev	Date	Reason for Issue	Chk

Keyplan



Client
FOLGATE ESTATES

Project
MURPHY'S YARD

Drawing Title
**Parameter Plan 01
 Location Plan**

Project Number 0360	Status PLANNING
Scale at A1 (A3) 1:1000	Date 18.06.21
Drawn by CR	Checked by SEW
Drawing Number 0360-SEV-ZZ-DR-A-PL6000	Revision 00

APPENDIX 2

Documents sought for approval:

1. Parameter Plans 1-14 by Studio Egret West ("SEW") – Please Refer to Planning Drawing Issue Sheet;
2. Design Code by SEW;
3. Development Specification by DP9.

The following additional documents in support of the application:

4. Completed Application Forms and Certificate;
5. Design and Access Statement ("DAS") by SEW;
6. Planning and Regeneration Statement by DP9;
7. Affordable Housing Statement by DS2;
8. Financial Viability Assessment (Redacted Version) by DS2;
9. Commercial Strategy Report by Hedge, Cushman & Wakefield and AND;
10. Retail and Office Sequential Site and Impact Assessment by Urban Shape;
11. Needs Based Assessment for Healthcare by Cushman & Wakefield LLP;
12. Statement of Community Involvement by Kanda;
13. Framework Travel Plan by Curtins;
14. Healthy Streets Transport Assessment by Curtins;
15. Outline Delivery and Servicing Plan by Curtins;
16. Outline Construction Logistics Plan by Curtins;
17. Car Parking Management Plan by Curtins;
18. Waste Strategy Plan by Hoare Lea;
19. Energy Strategy by Hoare Lea;
20. Outline Circular Economy Statement by Hoare Lea;
21. Whole Life Carbon Assessment by Hoare Lea;
22. Sustainability Statement by Hoare Lea;
23. Health Impact Assessment by Volterra;
24. Arboricultural Impact Assessment (including Arboricultural Survey) by Arbeco;
25. Ecological Impact Assessment by The Ecology Consultancy;
26. Bat Surveys by The Ecology Consultancy;
27. Biodiversity Net Gain Assessment by The Ecology Consultancy;
28. Basement Impact Assessment by Arup;
29. Basement Impact Assessment Proforma by Arup;
30. Flood Risk Assessment and Drainage Strategy Report by Arup;
31. Camden SUDS Proforma by Arup;
32. Outline Fire Strategy by Elementa;
33. Report on Ground Investigation by Ian Farmer Associates;
34. Archaeological Desk-Based Assessment by RPS;
35. Built Heritage Statement by RPS;
36. Employment and Training Strategy by Folgate Estates Ltd;

37. Construction and Environmental Management Plan by Stace;
38. Draft Construction/ Demolition Management Plan Proforma signed by Folgate Estates Ltd;
39. Air Quality Proforma by Air Quality Consultants;
40. Daylight Potential and Overshadowing Assessment by GIA;
41. Daylight and Sunlight Impacts Report by GIA;
42. Environmental Statement ("ES") by Trium unless stated otherwise:
 - Volume I: ES Main Report:
 - Chapter 1: Introduction
 - Chapter 2: EIA Methodology
 - Chapter 3: Alternatives and Design Evolution
 - Chapter 4: The Proposed Development
 - Chapter 5: Demolition and Construction
 - Chapter 6: Socio-Economics and Health by Volterra
 - Chapter 7: Traffic and Transport by Curtins
 - Chapter 8: Air Quality by Air Quality Consultants Ltd
 - Chapter 9: Noise and Vibration by Sandy Brown Ltd
 - Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare by GIA
 - Chapter 11: Wind Microclimate by Wintech Consultants (Europe) Ltd
 - Chapter 12: Greenhouse Gas Emissions by Air Quality Consultants Ltd
 - Chapter 13: Built Heritage by RPS
 - Chapter 14: Effect Interactions
 - Chapter 15: Likely Significant Effects and Conclusions
 - Chapter 16: Environmental Management, Mitigation and Monitoring Schedule
 - Chapter 17: Glossary and Abbreviations
 - Volume II: Townscape and Visual Impact Assessment ("TVIA") by Peter Stewart Consultancy
 - Volume III: Technical Appendices
 - Volume IV: Transport Assessment by Curtins
 - Non-Technical Summary ("NTS")